

Exmoor National Park

Local Plan

(including minerals and waste policies)

Publication Draft



2011 - 2031



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1. INTRODUCTION

- 1.1 This is the Publication Draft version of the Local Plan for Exmoor National Park. This introduction sets out and explains:
- a) The National Park Context;
 - b) Spatial Portrait;
 - c) The Duty to Co-operate;
 - d) National Policy and Guidance;
 - e) Role of the Local Plan;
 - f) Preparation of This Local Plan;
 - g) Implementation and Monitoring; and
 - h) How to Use This Plan.

NATIONAL PARK CONTEXT

- 1.2 Exmoor is one of 15 National Parks in the United Kingdom and one of only four in southern Britain. Designated for their natural beauty and for the opportunities they offer for open air recreation, National Parks contain some of the most spectacular scenery in Britain, where it is possible to experience open space, peace, wildness and tranquillity. National Parks have two statutory purposes, as defined in the Environment Act 1995¹, and National Park Authorities also have a duty to foster the economic and social well-being of local communities. These form the starting point for the Local Plan as set out in General Policy 1 (section 4).

SPATIAL PORTRAIT

- 1.3 Exmoor was designated as a National Park in 1954² and is situated within the counties of Somerset and Devon. The total area of the National Park is 693 square kilometres (267 square miles), of which approximately two thirds lies within West Somerset and one third of the area in North Devon with part of the south-eastern boundary adjoining the district of Mid Devon. The northern boundary is formed by the Bristol Channel. A total of 42 parishes are within (or partly within) the National Park with most of the population living in small dispersed settlements.
- 1.4 Exmoor National Park is an asset of national, regional and local importance as one of the few upland areas of southern England; the highest point at Dunkery Beacon rising 519m (1704 feet) above sea level. Exmoor provides a unique landscape of moorland, woodland, valleys, farmland and a spectacular coast shaped by both natural elements and human activity over thousands of years. Its remoteness, topography and climate have helped to maintain a large extent of well preserved, semi-natural upland landscapes and undeveloped coastline. Darkness is an important component of the tranquillity and quality of Exmoor's landscape character and in October 2011 Exmoor became the first National Park to achieve 'Dark Sky Reserve' status and the second Dark Sky Reserve in the world.
- 1.5 The National Park has many important rare species and unusual habitats due to the area's varied geology, geographical location and history of land use. Exmoor's wildlife provides numerous opportunities for people to understand and enjoy nature, and is a

¹ HM Government (1995) The National Parks and Access to the Countryside Act 1949, Section 5 as amended by Section 61 of the 1995 Environment Act

² Exmoor National Park (Designation) Order 1954 (HLG 92/176) – The National Archives, Kew.

key reason why people visit the National Park. Around 28% of the National Park is designated by UK and European law as Sites of Special Scientific Interest (SSSIs) and Special Areas of Conservation. Exmoor's landscapes and biodiversity provide a wide range of benefits or 'ecosystem services' for wider society as a whole and hosts around 2 million visitor days each year.

- 1.6 Exmoor has many settlements, sites and features of rich cultural interest. The character of buildings and settlements within the National Park varies considerably with diverse vernacular building styles and materials reflecting local geology and traditions, as well as periods of significance in each settlement's history. Exmoor's built environment consists of a range of dispersed farmsteads, hamlets and villages as well as slightly larger settlements that historically evolved as important centres for trade or as coastal resorts in Victorian times. The excellent quality of preservation of archaeological sites and historic features and the diverse nature of the historic resource within the National Park gives it special significance. However, these resources are also fragile, vulnerable to insensitive change and, ultimately irreplaceable. Significant research has been undertaken in recent years, which has considerably increased understanding of the heritage of Exmoor.
- 1.7 A significant challenge for Exmoor National Park Authority (ENPA) is to enable landowners, communities and businesses across Exmoor to mitigate the causes and adapt to the effects of climate change. There has already been considerable success in developing local approaches to low carbon living and mitigating climate change through taking advantage of renewable energy sources. These have been predominantly small-scale technologies including solar photo-voltaic panels, wind turbines and micro-hydro schemes. Adapting to climate change is particularly important in relation to flood risk as the topography and geology of Exmoor significantly influences the catchment hydrology and the response to rainfall. Many of the watercourses within Exmoor National Park form incised channels flowing through steep confined valleys, where channel gradients are steep, flood flows respond rapidly to rainfall and velocities and depths can be high. Most settlements on Exmoor are located in valley bottoms and often the low-lying areas of the settlement are at risk of flooding. This is a key constraint for new development and enabling existing development to adapt to the increased risk of fluvial and coastal flood events as an effect of climate change.
- 1.8 Exmoor is a living, working landscape with a resident population of 10,273 people recorded in 2011; a fall of 600 from 2001³. Approximately three-quarters of the population are within the West Somerset area of the National Park, and a quarter within the North Devon area. Exmoor's age profile shows the proportion of the population aged 60 years and over is around 40% with a median age of 53 compared with the national median age of 39. An ageing population is a national issue in terms of the consequences for public services including social care, an issue which is particularly exacerbated on Exmoor. The highest proportion of household type on Exmoor relates to family households the majority of which are two-person households. However, almost a third are single person households with single pensioner households constituting over half of these households, whilst other single person households account for the remainder.
- 1.9 The majority of housing (47%) within Exmoor is detached, which is comparable to other National Parks, but considerably higher than national and regional figures. The proportion of detached dwellings has slightly decreased since 2001 with a comparable

³ Office for National Statistics (2013) - 2011 Census, Key Statistics for National Parks in England and Wales

increase in the proportion of flats and apartments. Two-thirds of housing is owner-occupied, with 46% of houses owned outright with no mortgage⁴. Internal migration of those selling homes elsewhere to buy housing in the high quality environment of the Exmoor National Park has been a key driver for change in the housing market. A residential occupancy survey in 2000 of recently completed dwellings found that 89% were occupied by people who had previously lived outside the National Park boundary, and 54% were people who had lived outside of the south west region. However, despite this trend, around a third⁵ of occupied household spaces are rented from social and private landlords. Generally there is a high level of under-occupancy in the National Park area with over half of dwellings having at least 2 spare bedrooms⁶. Almost a fifth of all dwellings have no usual resident⁷ meaning they are vacant, second and holiday homes, this is a significant proportion of the available dwelling stock and reflects the popularity of Exmoor as a visitor destination.

- 1.10 Exmoor has one of the highest differentials between local wages and house prices in the country. The average household income in 2010 was £28,668⁸ the lowest for all English National Parks and 15% lower than that for the South West region as a whole. In 2013 the mean average house price⁹ was £287,227 – 25% higher than the average house price for the South West region. Evidence shows that households with an average income would not be able to afford the mean average house price (at 10 times average household income) without a significant deposit; whilst households with below average income are even further constrained. Addressing the affordable housing needs of local communities is therefore a key challenge for the Local Plan.
- 1.11 The local economy is focused upon a number of key sectors; the largest proportion of the working population (15.6%) being employed in the accommodation and food service sector. This is a reflection of the nature of the National Park and its attractiveness as a tourist destination. The retail sector accounts for 14.2% of employees which tourism will indirectly and directly influence¹⁰. The recreation and tourism opportunities that Exmoor offers are rare in southern England and surveys support the view that the area remains an important environmental asset for a wide range of people. Most visitors to Exmoor come to enjoy unspoiled countryside and outdoor recreation, of which walking is the most popular activity¹¹.
- 1.12 The third largest business sector is agriculture and forestry with 11.7% of all employees¹². Agriculture and forestry is essential for the maintenance of the characteristic landscape of the National Park relating to its mosaic of vegetation cover, the wildlife it supports, the pattern and character of Exmoor's farmsteads. Traditional hill farming and the skills and commitment of the farming community therefore provide economic benefits locally and regionally. Together with tourism, the agricultural and forestry sector and the accommodation and food service sector make up over 40% of employment for those living within the National Park illustrating that tourism and land-based enterprises are the main drivers of the local economy and an important employment resource. Two-thirds of working age people within the National Park are economically active with a high proportion of self-employed people, which reflects an economy dominated by small-scale businesses. Two thirds of economically inactive

⁴ Office for National Statistics (2013) - 2011 Census, Key Statistics for National Parks in England and Wales

⁵ Ibid (33.6% social and private rented housing)

⁶ Housing Vision (2015) Strategic Housing Market Assessment Update: Exmoor National Park March 2015

⁷ Office for National Statistics (2013) - 2011 Census, Key Statistics for National Parks in England and Wales

⁸ DEFRA Rural Statistics Unit (2010) National Parks: Economic Comparison

⁹ ENPA (2013) Exmoor National Park Annual House Price Survey 2013 (mean average house price based on Land Registry selling price) - *Exmoor National Park Authority, Dulverton*

¹⁰ Office for National Statistics (2013) 2011 Census, Key Statistics for National Parks in England and Wales

¹¹ ENPA (2010) Exmoor National Park Authority Visitor Survey 2010

¹² Office for National Statistics (2013) - 2011 Census, Key Statistics for National Parks in England and Wales

persons are retired and there are generally low levels of unemployment despite the low levels of economic activity¹³.

- 1.13 Opportunities for growth and investment to support sustainable development within the National Park lie within the development of the traditional tourism and land management sectors in addition to lifestyle businesses and knowledge-based businesses. This needs to be supported by improved broadband and mobile connectivity, promotion of the place and business support.
- 1.14 Within the National Park almost a third of the working age population works at or from home¹⁴ and existing telecommunications infrastructure has already benefited those areas with broadband access through: businesses and people relocating to rural areas from urban areas to enjoy a better quality of life, on the basis they can work from home and access online services; and the potential for rural manufacturers and retailers to access worldwide markets¹⁵. Improving and adapting this infrastructure can ensure that the social and economic benefits of accessing digital technology are available across the National Park. Access to superfast broadband is being addressed across the National Park through Connecting Devon and Somerset to help deliver faster broadband to the rural areas of both counties and will help to overcome significant transport constraints experienced by rural upland areas, through increased home working, distance learning and remote access to public services.
- 1.15 Due to the rural nature of the National Park and its dispersed settlements, it is not unexpected that just over half of economically active people commute to work by car with the average commuting distance around 13km¹⁶. Relatively few communities have access to a year round daily bus service¹⁷, although there are opportunities to use demand responsive transport for parishes within the West Somerset area of the National Park and community transport schemes to help those with no or limited access to transport access shopping or medical and other healthcare needs, including those with limited/impaired mobility. Traffic levels on Exmoor increase particularly during the main summer months when greater numbers of tourists visit the National Park. Although traffic pressures are not severe, there can be specific locations, which face congestion issues and parking problems during the busy holiday periods.
- 1.16 The National Park boundary¹⁸ was drawn to effectively exclude larger settlements and therefore the nature of Exmoor's small dispersed rural population effectively means that it is not possible to provide the full range of desired services and facilities within the National Park. These are generally provided at key urban centres surrounding the National Park such as Minehead, Taunton, Tiverton, South Molton, Barnstaple and Ilfracombe and these locations will be where a significant level of housing and employment growth will be directed. This may have implications for increased commuting out of the National Park, or local people relocating to access jobs and homes. The largest Exmoor settlements (Porlock, Dulverton and Lynton & Lynmouth) provide a range of services, facilities and employment for the resident community and a wider hinterland; whilst other settlements have some more limited services for day to day needs. A number of community services and facilities have been retained in these smaller settlements, which tend to be more isolated from larger centres.

¹³ Office for National Statistics (2013) - 2011 Census, Key Statistics for National Parks in England and Wales

¹⁴ Office for National Statistics (2003) Census 2001: Key Statistics for Local Authorities. London, The Stationery Office – 31.35% of people aged 16 – 74 in employment who work mainly at or from home within Exmoor National Park

¹⁵ Commission for Rural Communities (2008) Mind the Gap: Digital England – a rural perspective

¹⁶ Office for National Statistics (2003) Census 2001: Key Statistics for Local Authorities. London, The Stationery Office

¹⁷ A daily service running at least on a Monday – Saturday basis

¹⁸ Exmoor National Park (Designation) Order 1954 (HLG 92/176) – The National Archives, Kew.

THE DUTY TO CO-OPERATE

- 1.17 The duty to co-operate was created through the Localism Act 2011, which amends the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters. The duty to co-operate is also included within the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). Paragraph 178 of the NPPF states '*Public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the **strategic priorities** set out in paragraph 156. The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities*'¹⁹.
- 1.18 Exmoor National Park Authority is committed to the duty to co-operate and has produced a joint protocol²⁰ with partner organisations, setting the strategic issues requiring co-operation. This provides guidance and information to help ensure that decisions made by neighbouring local planning authorities and other organisations which affect the National Park, including on proposals outside its boundaries, are consistent with its statutory purposes. Exmoor National Park Authority has also signed a Devon wide Duty to Co-operate protocol with the Devon authorities and a Memorandum of Understanding with regard to sand and gravel with Somerset County Council. There is also substantial evidence detailing where and how Exmoor National Park Authority has demonstrated its compliance with the duty to co-operate and this can be found in the Duty to Co-operate Statement on the Authority's website.

NATIONAL POLICY AND GUIDANCE

- 1.19 The government published the NPPF in March 2012²¹ and the PPG was first issued in 2014²². This sets out the Government's planning policies for England relevant to the work of all planning authorities. It constitutes guidance for local planning authorities and decision-takers both in drawing up plans and as a material consideration in determining applications. The development plan remains the starting point for determining planning applications and planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.
- 1.20 The NPPF states that Local Plans should set out the strategic priorities for the area (see Section 2 of the Plan). This should include strategic policies to deliver the homes and jobs needed in the area and conservation and enhancement of the environment, including landscape²³. In accordance with the duty to co-operate, and noted above, plans should be based on co-operation with neighbouring authorities and public bodies on planning issues that cross administrative boundaries particularly those which relate to the strategic priorities. This is to ensure that they are co-ordinated and reflected in individual Local Plans to meet development requirements, which cannot wholly be met within their own areas because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of the NPPF²⁴.

¹⁹ DCLG (2012) National Planning Policy Framework (Paragraph 178). Department of Communities and Local Government

²⁰ ENPA and partner organisations (2015) The Exmoor Duty to Co-operate Protocol

²¹ DCLG (2012) National Planning Policy Framework. Department of Communities and Local Government

²² DCLG (2014) Planning Policy Guidance. This is an online resource which is kept updated

²³ DCLG (2012) National Planning Policy Framework (Paragraph 156) – Department of Communities and Local Government

²⁴ Ibid (Paras. 157, 178 and 179)

THE NATIONAL PARKS AND THE BROADS VISION AND CIRCULAR

- 1.21 The National Park Circular provides policy guidance specifically for the English National Parks and for all those whose decisions or actions that might affect them including, amongst others, government departments, government agencies, local authorities and other public bodies. The Circular includes a vision and sets out key outcomes:
- a) a renewed focus on achieving Park Purposes;
 - b) leading the way in adapting to, and mitigating climate change;
 - c) a diverse and healthy natural environment, enhanced cultural heritage and inspiring lifelong behaviour change towards sustainable living and enjoyment of the countryside;
 - d) fostering and maintaining vibrant, healthy and productive living and working communities; and
 - e) working in partnership to maximise the benefits delivered.
- 1.22 The NPPF, National Parks Circular and PPG have been taken into account in the preparation of this Local Plan which is judged to be consistent with national policy and guidance.

ROLE OF THE LOCAL PLAN

- 1.23 The Exmoor National Park Authority, as the Planning Authority for the area, has a statutory duty to prepare, monitor and review a Local Plan for the area within Exmoor National Park. The Local Plan, along with Neighbourhood Plans, form the statutory development plan for Exmoor National Park, including for minerals and waste development. This Local Plan excludes those parts of West Somerset and North Devon outside the Exmoor National Park boundary, which are covered by separate Local Plans prepared by West Somerset and North Devon Councils for their respective local planning authority areas.
- 1.24 The Local Plan links to the Exmoor National Park Partnership Plan²⁵ which sets out Exmoor's special qualities, the long term vision, objectives and priorities to be achieved on Exmoor and provides a framework for integrating the various activities of the National Park Authority and for stimulating and co-ordinating action by other agencies. The Partnership Plan vision and objectives are shared with the Local Plan. Section 2 of the Local Plan sets out the vision, which includes additional detail for the purposes of plan-making, together with the objectives and strategic priorities to guide development in the National Park. A spatial strategy directs development to the most sustainable locations, and in doing so, helps to conserve and enhance the National Park and its special qualities, as well as to achieve sustainable local communities and a thriving Exmoor economy for the period to 2031.

²⁵ ENPA (2012): Exmoor National Park Partnership Plan 2012-2017 – *Exmoor National Park Authority, Dulverton*

PREPARATION OF THIS LOCAL PLAN

- 1.25 The Publication version of the Local Plan has benefited from early and extensive consultation with communities and stakeholders, in accordance with the Statement of Community Involvement²⁶, as well as being based on available and commissioned evidence.
- 1.26 The policies set out in the Local Plan have been tested against a number of environmental, economic and social indicators within a Sustainability Appraisal (SA)²⁷ which also incorporates a strategic environmental assessment (SEA) of the Plan. An assessment of the impacts of the Plan on internationally important wildlife sites has also been carried out through a Habitats Regulations Assessment (HRA)²⁸. Recommended changes from the SA and HRA have been incorporated in the Plan.

IMPLEMENTATION AND MONITORING

- 1.27 The Local Plan will be monitored through the Exmoor National Park Authority Annual Monitoring Report, in order to establish whether the policies are achieving their intended objectives and whether there are unexpected trends or changed circumstances that may necessitate a review. A monitoring framework for the Local Plan is set out in Section 11.

HOW TO USE THIS PLAN

- 1.28 The Local Plan (together with any Neighbourhood Plans) is the sole development plan for the area. As such, it contains both strategic planning policies, and development management policies. The strategic policies take forward the vision objectives and strategic priorities and set out the overarching approach to development in the National Park. Development management policies provide more detailed criteria to guide planning decisions. The General Policies (preceded by GP) are strategic policies and apply to all proposals within Exmoor National Park. Each policy has a separate number. This starts with the code denoting the section it can be found in e.g. 'CC' for climate change, followed by 'S1' 'S2' and so on for strategic policies and 'D1' 'D2' for development management policies. All strategic policies (including 'general policies') are in coloured boxes. The Plan also contains a Policies Map that illustrates policies and proposals in the Local Plan.
- 1.29 **The policies within this Local Plan constitute an overall approach to future development in the National Park and it is important that the Plan is read as a whole.** A practical consequence of this is that several policies may apply to one proposal. Cross referencing of policies is used where it is particularly important to clarify the relationship between areas of policy. Links between other policies are generally not identified because it is impossible to pre-empt all potential combinations of policy that might apply to a particular type of development.
- 1.30 The National Park Authority encourages early discussions on proposals before submission of a planning application. These can initially be discussed with Planning Officers on the phone, by making an appointment at the National Park Authority offices in Dulverton or at one of the weekly planning surgeries in Porlock or Lynton.

²⁶ ENPA (2006) Exmoor National Park Authority Statement of Community Involvement August 2006

²⁷ LUC (2015) Exmoor Local Plan: Publication Draft Version (including minerals and waste policies) – Sustainability Report, *Land Use Consultants*

²⁸ SCC (2015) Exmoor National Park Local Plan 2011-2031 Publication Draft Habitat Regulations Assessment, *Somerset County Council*

2. VISION, OBJECTIVES AND STRATEGIC PRIORITIES

- 2.1 The vision for Exmoor National Park and its communities is based on the vision set out in the Exmoor National Park Partnership (Management) Plan 2012-2017 and the National Parks and the Broads Circular 2010. The vision sets out the outcomes that are sought for Exmoor by 2031.
- 2.2 The National Park Circular 2010 states that the National Park Authorities' primary responsibility is to deliver their statutory purposes and in doing so, that they should ensure they are exemplars in achieving sustainable development, helping rural communities in particular to thrive. The Circular sets out a joint vision to 2030 including that: *"By 2030 English National Parks and the Broads will be places where 'there are thriving, living, working landscapes notable for their natural beauty and cultural heritage. They inspire visitors and local communities to live within environmental limits and to tackle climate change. The wide range of services they provide (from clean water to sustainable food) are in good condition and valued by society. Sustainable development can be seen in action. The communities of the Parks take an active part in decisions about their future. They are known for having been pivotal in the transformation to a low carbon society and sustainable living. Renewable energy, sustainable agriculture, low carbon transport and travel and healthy, prosperous communities have long been the norm. Wildlife flourishes and habitats are maintained, restored and expanded and linked effectively to other ecological networks. Woodland cover has increased and all woodlands are sustainably managed, with the right trees in the right places. Landscapes and habitats are managed to create resilience and enable adaptation. Everyone can discover the rich variety of England's natural and historic environment, and have the chance to value them as places for escape, adventure, enjoyment, inspiration and reflection, and a source of national pride and identity. They will be recognised as fundamental to our prosperity and well-being"*²⁹.

VISION FOR EXMOOR NATIONAL PARK TO 2031

'Keeping Exmoor special' so that:

1. Exmoor's distinct and diverse landscape is maintained and enhanced, with an increased awareness of its importance.

In 2030, Exmoor's outstanding natural beauty with its mosaic of distinct and diverse landscapes and its dramatic coast and seascape, has been safeguarded and enhanced. Exmoor is still recognised as providing a sense of remoteness, wildness and tranquillity with landscapes predominantly free from and with no increase in intrusive structures and large scale development. It is renowned for its views of the night sky and lack of light pollution. ENPA and neighbouring authorities have worked together to ensure that the quality of the environment extends beyond the National Park boundary.

2. There is an increased extent of wildlife habitats and linkages between them, more habitats are in good condition and populations of valued native plants and animals are thriving.

Exmoor's geological sites have been conserved and its habitats are maintained, restored, extended, created and linked effectively to other ecological networks including moorland, mire, coastal heath and native woodlands. These habitats have been expanded and connected to form networks of multi-functional green infrastructure. This has taken place at a landscape scale achieved through partnership working within and across the National Park boundary. Together with farmed landscapes, habitats have thriving populations of native plants and animals. Consequently, wildlife populations are more resilient and, as a result, the number of

²⁹ DEFRA (2010) English National Parks and the Broads UK Government Vision and Circular

species declining or lost from Exmoor as a result of climate change has been minimised.

3. There is an enhanced knowledge of the historic environment of Exmoor; increased awareness of the value of its cultural heritage, and the most important historical sites, settlements, buildings and features are conserved and their historical character retained.

The historic environment, cultural and community heritage of the people of Exmoor has been sustained. Archaeological sites, historic settlements, buildings, farmsteads and features are conserved and where appropriate enhanced. Appropriate and necessary alterations to buildings, which preserve their historic interest and integrity, have helped to reduce reliance on fossil fuels and to enable adaptation to climate change. New development has been carefully managed to ensure that the diversity and traditional and historic character of Exmoor's settlements and buildings are conserved and enhanced for future generations. Communities and partners, including ENPA, have worked together to produce and deliver a vision and holistic plan for the enhancement of individual settlements. Together, these have been recognised for their contribution to Exmoor's distinctive cultural heritage and in strengthening its communities. The result has been high quality, sometimes contemporary, sustainable, design. This has successfully blended the new with the old and minimised its contribution to climate change by using natural and, where possible, local materials, being energy efficient, using sustainable construction techniques and appropriate renewable technologies. There are sources and supply chains for local building materials to serve the needs of Exmoor's communities including from small scale stone quarries and well managed woodlands. These local sources of building materials both conserve and enhance the environment and support the local economy.

4. Exmoor's natural resources are used sustainably and the full benefits of its ecosystems are understood and harnessed. Pollution is minimised, air and water are high quality, and soils are conserved and in good condition.

Exmoor is valued for the range of ecosystem services its natural environment provides, from clean water, and sustainable food to increased woodland cover and mire, which act as 'carbon sinks' and help to address climate change. The level and nature of development and lifestyles have ensured that these natural environment services are sustainable in the longer term. Exmoor's air and water are clean and of high quality. Pollution is avoided or reduced to below harmful levels. As climate change results in hotter, drier summers and wetter, stormier winters, measures are in place to conserve water, reduce runoff and avoid and reduce flooding and soil erosion in a way compatible with National Park purposes.

5. We are closer to achieving a carbon-neutral National Park to help mitigate climate change, and have introduced measures to adapt to changes in climate that are already happening.

The impacts of climate change on Exmoor's natural environment, its communities, businesses and the effect on its resources are better understood through monitoring and research. They are being planned for and actively addressed through mitigation and adaptation measures to help make Exmoor more resilient to changes without compromising the special qualities of the National Park. The coastal communities of Porlock Weir and Lynmouth, affected by sea level rise, are working with ENPA and other partners to plan for and adapt to changes. Since Exmoor is an exemplar for sustainable development, it has inspired local communities and visitors to live within environmental limits and to play their part in working towards a carbon- neutral National Park and more sustainable lifestyles increasing energy efficiency to help tackle and adapt to climate change. Appropriate renewable energy technologies, are in place and these are located, designed and at a scale to conserve Exmoor National

Park's landscape and wildlife with areas, including its skylines and open expanses, remaining free of them. Exmoor's communities have found ways of reducing and reusing waste, and have access to recycling facilities. Together with sustainable agriculture, low carbon transport and travel, sustainable living is becoming the norm.

6. There is increased public awareness and enjoyment of the National Park, a warm welcome and high quality experience for everyone seeking inspiration, tranquillity and active outdoor recreation, leading to greater understanding of Exmoor and its way of life and a wider appreciation of the contribution that National Parks make to quality of life.

There is a warm welcome and high quality Exmoor experience for everyone who visits the National Park to discover its natural and historic environment, seek inspiration, enjoyment, tranquillity, wildness and to take part in active outdoor recreation and activities. These are linked to a viable and sustainable local economy (including the local area beyond the National Park) with a range of accommodation. This includes accommodation which enables young people and families to stay, based on small scale, accessible educational, tourism and recreation facilities, which benefit from and are in sympathy with Exmoor's environment and ways of life and which respond to the needs of visitors and local communities. As travel has become more expensive, people are choosing to extend their visits, some use alternative forms of transport and rely less on the private car.

7. Exmoor's communities retain a continuity of connection with the land; and communities are taking the lead in shaping future development to meet their needs and aspirations including access to services, housing, communications and infrastructure.

All communities on Exmoor are viable, healthy, prosperous and able to retain young and working age people. They take an active part in decisions and development in the National Park and are at the heart of decisions about their future. They work in partnership with ENPA and others to plan and achieve their aspirations while conserving Exmoor's environment. Everyone, including those without a private car, can access essential services and facilities within and outside the National Park in Devon and Somerset. This has been achieved through the retention of and, where opportunities have allowed, the improvement and increased flexibility of community services, facilities, recreational and green space and this has helped meet the needs of Exmoor's communities and visitors and minimised the need to travel.

The development that has taken place in the National Park has addressed the socio-economic needs of the local community rather than external demand. As the priority has been to address local affordable need, new housing (or 'Homes for Exmoor') is small scale and sympathetically designed to provide for local and affordable housing needs for those with a strong connection through living or working in the National Park. These have been achieved through the best use of land, existing homes, and buildings. New housing and employment is located in and adjoining Exmoor's settlements and is compatible with the National Park's landscape. It may be rented or owner occupied and many are self-build projects. Existing homes have been adapted, subdivided or new development designed so as to be flexible to the changing needs of a household. Some homes may be live/work units or are designed to be part of a low impact, land-based, sustainable lifestyle, linking with local resources, economy and services. As a result, local families, young and older people and those with a disability have been able to stay on Exmoor, and thereby contribute to vibrant, mixed working communities with strong support networks and a buoyant local economy. This together with the retention of services and facilities, community areas- such as sports and recreation areas- and local employment, has benefited Exmoor's communities and visitors, as its settlements seek to become increasingly self-contained.

Public and community transport services have been retained and tailored to the needs of communities and visitors, connecting with provision outside the National Park, while opportunities for walking, cycling and horse-riding, have been increased by linking rights of way and access to open areas and green space including across the National Park boundary. The traditional and distinctive character of Exmoor's environment has been conserved and, together with the safety of all users, has been enhanced through innovative approaches to slow traffic in settlements and encourage more walking, cycling and horse-riding through appropriate highway design and infrastructure, minimising signs and street lighting. Essential utilities and infrastructure have been well designed to blend in with the landscape.

8. There is a strong, diverse and resilient economy where farming, forestry, land management and rural enterprises are playing a lead role in conserving and enhancing Exmoor's special qualities, producing high quality food and other produce, and conserving local breeds. There is a sustainable tourism and recreation economy in harmony with local communities and the environment.

Sustainable and viable low carbon farming, forestry, land management and rural enterprises based on Exmoor National Park's special qualities are playing a lead role in stewardship of the land, conservation and enhancement of Exmoor's landscape, wildlife and cultural heritage. In addition to the production of a recognised Exmoor brand of high quality food, and an increase in the use of biomass, such as wood fuel from Exmoor's woodlands serving a local market. Traditional breeds are thriving on Exmoor, and are adding value to the local economy as well as supporting traditional land management. Together, farming, forestry and land management help underpin a strong, diverse and sustainable local economy that benefits from and contributes to the care and appreciation of Exmoor National Park. Small businesses and homeworking increasingly make an important contribution to Exmoor's employment and local economy with both new and existing businesses able to take advantage of high quality broadband for all and improved telecommunications. These are designed to ensure that the Exmoor's landscape is conserved by mimicking natural features and using existing structures.

OBJECTIVES

- 2.3 The vision has been translated into objectives, which are shared with the Partnership Plan. The policies within the Plan, when implemented, will contribute towards meeting the vision and objectives. The objectives are set out below and throughout the Plan, where appropriate.
1. To conserve and enhance Exmoor's landscapes as living working landscapes that remain predominately free from intrusive developments, maintain a sense of tranquillity and protect Exmoor's dark skies.
 2. To ensure that Exmoor's moorlands remain open, remote and relatively wild in character; that views are preserved, and strategically important areas of former moor and heath are managed in a way that restores their wilder landscape character.
 3. To protect and enhance Exmoor's wildlife and habitats and seek to improve the diversity, extent, condition and connectivity of Exmoor's important and valued habitats.
 4. To maintain or increase the populations of native wildlife species on Exmoor that are valued for their conservation status and local distinctiveness, and control and eradicate non-native species.
 5. To ensure that the built tradition, character, distinctiveness and historic character of Exmoor's settlements, buildings, farmsteads, landscapes, archaeological sites and

monuments is conserved and enhanced and that the cultural heritage of Exmoor is protected through the careful management of development.

6. To encourage new development to use local materials, sustainable building design and methods, in ways that contributes to the distinctive character and cultural heritage of Exmoor.
7. To conserve and enhance Exmoor's natural resources and to improve air and water quality, conserve water resources, ensure soils are in good condition, maximise carbon storage, and minimise pollution.
8. To provide opportunities for people from all backgrounds and abilities, including young people and new audiences, to learn about and enjoy Exmoor National Park, leading to a greater understanding of Exmoor and its way of life.
9. To maintain and improve the recreational opportunities in the National Park particularly the rights of way network, access to open country, other quiet and active recreation based on Exmoor's special qualities; and ensure that opportunities for recreation can be enjoyed by people from all backgrounds and of all abilities.
10. To support, record and understand aspects of culture and traditions that are special to Exmoor.
11. To enable Exmoor's communities and partnerships to plan development in their neighbourhoods to help meet their needs and aspirations while conserving the special qualities of the National Park.
12. To address local and affordable housing needs, making the best use of existing developed land and buildings; ensuring a mix of housing and a housing stock, which helps sustain local communities.
13. To improve the sustainability, resilience and self-sufficiency of the National Park's settlements by supporting the retention, provision of, and access to community services and facilities.
14. To achieve a strong, diverse, resilient and self-sufficient economy and encourage economic and employment opportunities, which do not conflict with National Park purposes.
15. To achieve profitable farming, forestry and land management in ways that conserve and enhance the special qualities of the National Park, whilst producing food and other produce, and conserving distinctive local breeds.
16. To support the tourism industry in providing a warm welcome and a range of sustainable accommodation, services and facilities, leading to a high quality Exmoor experience for visitors and local communities alike.
17. To achieve high quality telecommunications and essential utilities and infrastructure in ways commensurate with the conservation of the National Park's natural beauty, landscape wildlife, cultural heritage and special qualities.
18. To support sustainable transport for residents and visitors by improving public and community transport services and opportunities for walking, cycling and horse riding including linkages across the National Park boundary.
19. To minimise the net emissions of carbon dioxide and other greenhouse gases into the atmosphere, and support measures which contribute to carbon neutrality in ways that both conserve and enhance the National Park.
20. To adapt to the anticipated effects of climate change on Exmoor's communities, businesses, landscape, wildlife and coast including flood risk, sea level rise, and unexpected weather events and so on.
21. To minimise waste and emissions and support opportunities for reuse and, recycling in ways compatible with Exmoor's National Park designation.

STRATEGIC PRIORITIES

2.4 The Local Plan responds to the key issues identified through consultation, monitoring and analysis of evidence base documents. The following strategic priorities have been identified as a focus for development management within the National Park:

- 1. To ensure sustainable development which enables communities and businesses to thrive, whilst conserving and enhancing the National Park's special qualities by:**
 - i. Protecting Exmoor's natural beauty, wildlife and cultural heritage and avoiding adverse impacts of development on these special qualities.
 - ii. Making the best use of existing land and buildings and protecting the open countryside.
 - iii. Ensuring new development is located primarily in settlements and reflects their scale, form and character.
 - iv. Encouraging high quality design and sustainable construction, to enhance the National Park's landscapes and settlements.

- 2. To support and empower communities to help meet identified local needs, prioritising the delivery of affordable housing, safeguarding community services and facilities, improving accessibility where possible, and responding to climate change by:**
 - i. Prioritising local needs affordable housing, and housing for the specific needs of Exmoor's communities (rural workers, succession farm, extended family dwellings, specialist housing for older and more vulnerable people).
 - ii. Enabling flexibility to deliver affordable housing through principal residency housing.
 - iii. Encouraging a balanced housing stock with a mix of sizes, types and tenure.
 - iv. Retaining existing local services and facilities and supporting provision of new ones.
 - v. Helping local communities adapt to climate change including flood risk and coastal change.
 - vi. Contributing towards climate change mitigation through supporting natural resource conservation, sustainable travel (within the constraints of a remote, rural area) and small-scale renewable energy.
 - vii. Improving accessibility in the National Park through development that is well connected to existing services and facilities.

- 3. To enable a diverse and resilient local economy through locally generated growth and sustainable development which:**
 - i. Safeguards existing employment land and buildings.
 - ii. Provides flexibility for business development including home based businesses, and supports appropriate agricultural and forestry development.
 - iii. Supports provision of improved communications networks including mobile and broadband.

- 4. To encourage understanding and enjoyment of the National Park through recreation and tourism development which are compatible with the quiet enjoyment of Exmoor's special qualities by:**
 - i. Providing for a range of holiday accommodation.
 - ii. Ensuring that development in relation to outdoor recreation activities is compatible with the quiet enjoyment of Exmoor's special qualities.
 - iii. Ensuring the access network and routes of former railways are safeguarded.

3. GENERAL POLICIES

- 3.1 This Local Plan contains five general policies, which will apply to all development within Exmoor National Park and should therefore be read in conjunction with all other policies in the Plan.

ACHIEVING NATIONAL PARK PURPOSES AND SUSTAINABLE DEVELOPMENT

CONTEXT

- 3.2 The National Park Circular 2010 states that the National Park Authorities' primary responsibility is to deliver their statutory purposes and in doing so, that they should ensure they are exemplars in achieving sustainable development, helping rural communities in particular to thrive. The Circular sets out a joint vision to 2030³⁰.

PURPOSES AND DUTY OF THE NATIONAL PARK

- 3.3 The purposes of National Park designation were established in the National Parks and Access to the Countryside Act 1949, and amended by the Environment Act 1995, to:

- I. **Conserve and enhance the natural beauty, wildlife and cultural heritage (of the National Parks); and**
- II. **Promote opportunities for the understanding and enjoyment of the special qualities (of the National Parks) by the public.**

National Park Authority Duty: In pursuing the statutory purposes, National Park Authorities have a duty to seek to foster the economic and social well-being of local communities.

- 3.4 As Exmoor is a National Park, the two statutory purposes and the socio-economic duty underpin this Local Plan. The reference to 'cultural heritage' in the first purpose, encompasses the historic environment. In Section 2 of this Plan, a series of strategic priorities, provides the overall strategy for the Local Plan. Sitting under the statutory purposes and duty is the vision and a series of Partnership Plan and Local Plan objectives.
- 3.5 Exmoor National Park will continue to seek early discussion on proposals and close working and co-operation with partners, in order to find solutions and avoid potential conflicts. However, where there is irreconcilable conflict between the National Park purposes, the first purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage should prevail. This concept is known as the 'Sandford Principle'³¹.
- 3.6 The achievement of National Park purposes relies on the active support and co-operation of Government and public bodies including local authorities and utility companies, whose activities affect Exmoor. Section 11A of the National Parks and Access to the Countryside Act 1949 requires that "*a National Park Authority, in seeking to foster the wellbeing of local communities within the National Park, shall co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the National Park*". Under this section of the Act, 'relevant authorities' should also have regard to National Park purposes when making decisions or carrying out activities relating to or affecting land within the

³⁰ DEFRA (2010) English National Parks and the Broads UK Government Vision and Circular

³¹ HM Government (1949) The National Parks and Access to the Countryside Act 1949 - Section 11a (2) (as amended by Section 62 of the Environment Act 1995)

National Park³². Authorities and public bodies must show they have fulfilled this duty. Where their activities outside National Parks might have an impact inside them, the Government says they should have regard to National Park purposes³³.

SUSTAINABLE DEVELOPMENT

- 3.7 A fundamental aim of the Local Plan is to ensure that development in the National Park is sustainable. A widely-used and accepted definition of sustainable development is: “*development which meets the needs of the present without compromising the ability of future generations to meet their own needs*”³⁴.
- 3.8 The UK Sustainable Development Strategy 2005³⁵, sets out five guiding principles for sustainable development, which includes living within environmental limits, ensuring a strong, healthy and just society, achieving a sustainable economy, using sound science responsibly and promoting good governance.
- 3.9 The National Planning Policy Framework (NPPF) states that the purpose of planning is to help achieve sustainable development. It sets out ‘a presumption in favour of sustainable development, which should be seen as a ‘golden thread’ running through both plan making and decision taking’³⁶. The NPPF sets out three dimensions to sustainable development: the economic, social and environmental roles for the planning system to deliver:
- a) **an economic role** – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
 - b) **a social role** – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and supports its health, social and cultural well-being; and
 - c) **an environmental role** – contributing to protecting and enhancing our natural, built and historic environment, and as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change, including moving to a low-carbon economy.
- 3.10 The Government states that these three components should be pursued in an integrated way, looking for solutions which deliver multiple goals.
- 3.11 The National Park’s statutory purposes together with the duty broadly reflect the three dimensions of sustainable development in the NPPF. Policy GP1 brings the statutory purposes and sustainable development principles together setting out criteria to ensure that new development is consistent with National Park purposes and defining sustainable development in Exmoor National Park. To ensure that development contributes to the achievement of the Partnership Plan/Local Plan Vision and

³² Section 62 11A (2) of the Environment Act 1995 states that “in exercising or performing any functions in relation to, or so as to affect, land in a National Park, any relevant authority shall have regard to the [National Park purposes specified in subsection (1) of section five of this Act and, if it appears that there is a conflict between those purposes, shall attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area comprised in the National Park”

³³ DEFRA (2005) Guidance Note: Duties on relevant authorities to have regard to the purposes of National Parks, Areas of Outstanding Natural Beauty and the Norfolk and Suffolk Broads DEFRA, London (Paras 4-8)

³⁴ WCED (1987) Report of the World Commission on Environment and Development: “Our Common Future”

³⁵ DEFRA (2005) Securing the Future- Delivering UK Sustainable Development Strategy

³⁶ DCLG (2012) National Planning Policy Framework. (Paragraph 14). Department of Communities and Local Government

objectives, GP1 requires that development proposals should demonstrate that they will not conflict with the vision and objectives.

- 3.12 This approach is consistent with the NPPF in which sets out a presumption in favour of “sustainable development” and indicates where development should be restricted.³⁷ The Government is clear that need alone is not the only factor to be considered. Objectively assessed needs should be met unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted. Such policies include those relating to sites protected under the Habitats Directive, and/or designated as sites of special scientific interest; local green space, heritage coast **or within a national park**; designated heritage assets; and locations at risk of flooding or coastal erosion³⁸.
- 3.13 The NPPF makes clear that “*great weight should be given to conserving landscape and scenic beauty in National Parks ... , which have the highest status of protection in relation to landscape and scenic beauty*”³⁹. It refers to the National Parks and The Broads Vision and Circular as it provides further guidance and information on National Parks.

ENHANCEMENT OF THE NATIONAL PARK

- 3.14 The first purpose of National Parks is the conservation and enhancement of their natural beauty, wildlife and cultural heritage. As well as ensuring new development conserves local landscape and built character, opportunities for enhancement measures should be taken as they are also needed to fully meet National Park purposes.
- 3.15 The National Park Vision highlights the conservation and enhancement of Exmoor National Park’s natural beauty, wildlife and cultural heritage including its archaeology, historic settlements, buildings and features and recognises the need to address intrusive structures. Changes, mainly as a result of external factors, such as the availability nationally of financial incentives, have contributed to a gradual erosion of Exmoor’s distinctive character, resulting, for example, from the demand for the re-use of traditional former agricultural buildings, for extensions and alterations to dwellings and by the use of standardised building techniques and materials.
- 3.16 To maintain the distinctive character, quality and local distinctiveness of Exmoor National Park’s landscape and settlements, careful intervention and focus is therefore needed to ensure high quality new development and to respond to opportunities for enhancement.
- 3.17 Enhancement should be closely related to the natural beauty and/or wildlife and cultural heritage of the area, its special qualities and valued features. Considerations will include the quality of the design and its contribution to the local distinctiveness, character and appearance of the area and be consistent with other Plan policies. Policies elsewhere in this plan include specific criteria for opportunities for enhancement, and other benefits to the community, such as those for new housing for local communities (Section 6), and for the economy and employment, which includes the approach to safeguarding existing employment land and buildings (Section 7).
- 3.18 Planning decisions and other tools may enable opportunities to remove or treat intrusive or other undesirable structures or features. Such works must be carried out sympathetically to avoid causing harm to the National Park and its special qualities, the locality and site.

³⁷ DCLG (2012) National Planning Policy Framework. (Paragraph 14 Footnote 9). Department of Communities and Local Government.

³⁸ DCLG (2014) Planning Policy Guidance [Paragraph: 044 Reference ID: 3-044-20141006]

³⁹ DCLG (2012) National Planning Policy Framework. (Paragraph 115). Department of Communities and Local Government

- 3.19 The paragraph below sets out four principles to underpin opportunities for the enhancement of the National Park and reflecting the first statutory purpose. It takes forward objectives in the Plan including to:
- a) ensure that Exmoor's moorlands remain open, remote and relatively wild in character; that views are preserved;
 - b) conserve and enhance Exmoor's landscapes as living working landscapes that remain predominately free from intrusive developments;
 - c) ensure that the built tradition, character, distinctiveness and historic character of Exmoor's settlements, buildings, farmsteads, landscapes, archaeological sites and monuments is conserved and enhanced and that the cultural heritage of Exmoor is protected through the careful management of development.
- 3.20 Principles for the enhancement of the National Park:
- a) opportunities for enhancing the special qualities and valued features of the National Park should be identified and responded to.
 - b) proposals to enhance the National Park should demonstrate a significant overall benefit to the natural beauty, wildlife and cultural heritage, including the historic environment, of the area and should not undermine the achievement of other Plan Policies.
 - c) opportunities should be taken to enhance the National Park by the treatment or removal of intrusive structures or features in a way which conserves the special qualities or valued features of the site and its surroundings.
 - d) opportunities which arise for the enhancement of natural resources, land (including contaminated land and the removal of pollutants) and access/transport should be taken.
- 3.21 Examples of enhancement could include treatment or removal of structures including masts or poles/overhead wires or modern redundant buildings including large sheds which are considered to have a detrimental and/or cumulative impact on the National Park landscape. Occasionally the National Park Authority may consider that material planning considerations demonstrate that a scheme can be accepted as an exception to policies, in order to achieve a significant overall benefit to the National Park, for example, the development at Cutcombe, which enabled the replacement of the livestock market, was permitted as a departure to policies in the previous Local Plan.
- 3.22 In order to help to ensure that new development conserves and enhances the National Park and its special qualities, development briefs and appraisal documents may be used. From time to time, larger, more complex opportunities for enhancement may arise which require a development brief to bring together enhancement and socio-economic opportunities and which will deliver the most sustainable outcome for the community. These will be used selectively and only where there is a clear need to bring forward development and/or evidence that interest in a site has been discouraged by a lack of clear site specific guidance.

GP1 ACHIEVING NATIONAL PARK PURPOSES AND SUSTAINABLE DEVELOPMENT

- 1. Sustainable development for Exmoor National Park will conserve and enhance the National Park, its natural beauty, wildlife and cultural heritage and its special qualities; promote opportunities for their understanding and enjoyment by the public, and in so doing, foster the social and economic wellbeing of local communities.**
- 2. In achieving sustainable development all proposals for new development, activities and land use will demonstrate that:**
 - a) They are consistent with the National Park's legal purposes and duty. Where there is irreconcilable conflict between the statutory purposes, the conservation and enhancement of the National Park will prevail consistent with the Sandford Principle; and**
 - b) They do not conflict with the vision and objectives of the Exmoor National Park Management Plan and the policies in this Local Plan read in combination.**
- 3. Opportunities must be taken to contribute to the sustainable development of the area. Particular attention will be paid to:**
 - a) ensuring high quality design and the intensity of the use or activity is appropriate to the character and appearance of the National Park;**
 - b) the impact on the character and setting of the site and/or buildings;**
 - c) supporting the function and resilience of communities by retaining and strengthening their services and facilities, protecting their safe, attractive public places and employment opportunities and providing for a size, type and tenure of housing to address local affordable needs and help create a balanced community;**
 - d) accessibility to services, local services and facilities, jobs and technology, enabling, where appropriate, the use of sustainable transport and the impact on traffic levels;**
 - e) the efficient use of land, buildings, services and infrastructure;**
 - f) the impact on the amenities of local residents, occupiers of neighbouring properties, and visitors, and conserving or enhancing the quiet enjoyment of the National Park;**
 - g) the use of sustainable building techniques, materials and minimising energy use and waste;**
 - h) maintaining the quality of natural resources and ensuring ground conditions are acceptable;**
 - i) the needs of future generations, through sustainability and resilience to climate change and adapting to and mitigating the impacts of climate change; and**
 - j) supporting the health and socio-economic wellbeing of local communities and encouraging community participation.**

MAJOR DEVELOPMENT

CONTEXT

- 3.23 Exmoor National Park's landscape is recognised as being relatively free from major structures or development. The Government's longstanding view has been that planning permission for major developments should not be permitted in National Parks except in exceptional circumstances, as set out in the NPPF and National Parks Circular 2010 whereby an exceptional circumstance is defined as: if the development is absolutely necessary, in the public interest and there is no practical alternative. In relation to this national policy context, the term 'major developments' is not specifically defined.
- 3.24 Due to the relative remoteness, tranquillity and natural beauty of the National Park and the scale and size of most proposals, 'major development' is considered to be of a scale that is context-specific and a matter of planning judgement, i.e. it would exceed the local-scale development to address the social and economic needs of Exmoor's communities, and would be considered to also have potential adverse impacts on the National Park's statutory purposes. As such, in the context of this policy, major development is not defined just in terms of scale⁴⁰ but also the impact on the National Park and its special qualities.
- 3.25 The application of criteria, such as:
- a) whether the development is Environmental Impact Assessment (EIA) development,⁴¹ or
 - b) developments that fall within Schedule 2 of the EIA Regulations⁴² that after being screened by the National Park Authority, are considered as likely to have significant effects on the environment due to its nature, size or location and require an assessment, or
 - c) developments that require the submission of a Transport Assessment or Statement,
- will be relevant considerations, but may not determine whether the development is considered 'major' under this policy.
- 3.26 The National Park Authority will therefore consider whether a proposed development is deemed to be 'major' on a case by case basis taking into account the potential impacts of the proposed development on the National Park and in its local context.
- 3.27 Within the National Park there are two European sites for nature conservation: these are the Exmoor Heaths Special Area of Conservation (SAC) and the Exmoor and Quantocks Oak Woodlands SAC. Major development, has the potential to affect the conservation objectives of such sites, even where it might be remote from them (see further information relating to Ecological Zones of Influence – Policy CE-S3 Biodiversity and Green Infrastructure). For example, habitats used by barbastelle bats can be nine or more kilometres from the SAC site while otters are known to have territories of up to 20km. Where there may be adverse effects on the SAC sites, both within the designated boundary, or in areas which support the conservation objectives ecologically, it would need to be proved that there will be no likely significant effect. Policy CE-S3 Biodiversity and Green Infrastructure requires therefore that there should

⁴⁰ HM Government (2010) Statutory Instrument 2010 No.2184- The Town and Country Planning (Development Management Procedure) (England) Order 2010 - Article (2) definition of 'major development'

⁴¹ HM Government (2011) Statutory Instrument 2011 No.1824 – The Town and country Planning (Environmental Impact Assessment) Regulations 2011

⁴² Ibid.

be no significant effects to proposed or designated European sites for nature conservation both within the sites' boundaries and in areas that ecologically support the conservation objectives of the site.

GP2 MAJOR DEVELOPMENT

- 1. In the context of the National Park, major development is defined as development which has the potential to have a significant adverse impact on the National Park and its special qualities due to its scale, character and nature.**
- 2. In securing National Park purposes and responding to the National Park's duty to foster the social and economic wellbeing of its communities, applications for major development will not be permitted except in exceptional circumstances and only then following the most rigorous examination; where applicants can demonstrate that they are in the public interest.**
- 3. Proposals for major development will need to demonstrate:**
 - a) the need for the development, including in terms of any national considerations;**
 - b) the impact of permitting it, or refusing it, upon the local economy and local communities and the extent to which it will provide a significant net benefit to the National Park;**
 - c) the cost of, and scope for, developing elsewhere outside the National Park, or meeting the need for it in some other way;**
 - d) that there are no significant effects on proposed or designated European sites for nature conservation both within their boundaries and in areas that ecologically support the conservation objectives of the site;**
 - e) any detrimental effect on the natural and historic environment, the landscape, and recreational opportunities, including the National Park's special qualities, and the extent to which it could be moderated (through applying the avoidance mitigation and compensation sequence of tests set out in clause 4 of this policy);**
 - f) that the cumulative impact of the development when viewed with other proposals and types of development is acceptable; and**
 - g) the scope for adequate restoration of the land once the use has ceased.**
- 4. Where the tests of clause 3 have been met, then every effort to avoid adverse effects will be required. Where adverse effects cannot be avoided, appropriate steps must be taken to minimise harm through mitigation measures. Appropriate and practicable compensation will be expected for any unavoidable effects that cannot be mitigated.**

SPATIAL STRATEGY

CONTEXT

- 3.28 The purpose of the planning system is to contribute to the achievement of sustainable development that includes supporting strong, vibrant and healthy communities by providing the type of development that reflects the community's needs and supports its health, and social and cultural well-being⁴³.
- 3.29 Plans should take account of the different roles and character of areas and in promoting sustainable development in rural areas, locate development, such as housing, where it will enhance or maintain the vitality of rural communities. This includes recognising that groups of smaller settlements may share and support services within and between their communities.
- 3.30 The publication of the Taylor Review⁴⁴ in 2008 provided an in depth focus on what sustainability should mean for rural areas. This report recognises that planning has an important role in delivering sustainable development in the right places to make positive contributions to people's lives, whilst ensuring the protection of important open spaces, the countryside and the natural and historic environment. However, the report highlighted that in many cases the criteria used to identify sustainable locations for development were too inflexible, which meant that many settlements in rural areas faced a downward cycle of decline through loss of services and local people unable to afford to live there.
- 3.31 Policy GP3 Spatial Strategy identifies where new development will be focussed, and what type of development is permitted, in principle, within the settlements identified within the settlement hierarchy as Local Service Centres and Villages. The overall aim is to ensure that these communities are sustained over the longer term through appropriate development that is of a scale that is proportionate to its location and the socio-economic needs of Exmoor's communities, within the context of the highly valued landscape of the National Park. Outside of these settlements, the area is defined as the 'open countryside' and includes farmsteads, isolated dwellings and hamlets.
- 3.32 A range of settlements are identified as suitable locations for development including those with a relatively extensive range of services and facilities that also serve a wider hinterland, and smaller settlements with a more limited range of services that serve the local community.
- 3.33 The spatial strategy will help to ensure that Exmoor's settlements are socially cohesive and equitable by maintaining and creating balanced and mixed communities. Opportunities to be in closer proximity to services and jobs and maintaining social networks are improved through identifying where new development is considered to be acceptable. The social sustainability of communities should not be underestimated in dispersed rural areas and allowing for new development provides opportunities for friends and families to live in close proximity and support each other. In small communities even a relatively low number of affordable homes can enhance their long term sustainability and have a positive outcome for those who live and work there. The spatial strategy must therefore address the local need for affordable housing, provide opportunities for the diversification of Exmoor's economy and maintain a range of local services and facilities.

⁴³ DCLG (2012) National Planning Policy Framework. (Paragraph 7). Department of Communities and Local Government

⁴⁴ DCLG (2008) A Living Working Countryside: The Taylor Review of Rural Economy and Affordable Housing

SETTLEMENT HIERARCHY

- 3.34 It is considered appropriate to retain a settlement hierarchy, whereby the named settlements are divided into categories based on their role and function, but also recognising the constraints that may impact on their ability to accommodate new development. A technical paper has been produced, which objectively assesses each settlement against a range of factors and informs the identification of each settlement within the hierarchy⁴⁵. This approach ensures that communities and their landscape setting are conserved and enhanced whilst providing development opportunities to help sustain their settlements over the long term.
- 3.35 The development strategy for Exmoor National Park, and the spatial strategy overall, is strongly affected by the close proximity of this National Park to a number of towns offering a range of jobs, services, retail and leisure opportunities as shown on the Key Diagram (Map 3.1). The National Park settlements exist at a rural level beneath most conventional settlement hierarchies, within which allocations would not normally be made, and provides scope only for exceptional development requiring a rural location, such as to meet local needs for affordable housing. The Authority considers its spatial strategy is consistent with the approach in neighbouring rural areas.
- 3.36 It is recognised that many key services such as hospitals, supermarkets, secondary schools and colleges, are provided by towns outside the National Park, including Minehead, Taunton, Tiverton, South Molton, Barnstaple and Ilfracombe. These are more appropriate locations for higher levels of growth in terms of housing and employment due to their size and strategic role for the area.
- 3.37 The categories within the hierarchy are:
- Local Service Centres
 - Villages
 - Porlock Weir
- Collectively these settlements are referred to in the Plan as the ‘named settlements’.
- 3.38 **Local Service Centres:** Dulverton, Lynton & Lynmouth and Porlock are the largest settlements within the National Park and provide the most extensive range of services in one place. Therefore, they are the most suitable locations, in principle, for new development to consolidate employment and services to help address the needs of the National Park as a whole, the surrounding area, and the local community. The influence of Dulverton in particular also extends to areas outside the National Park’s southern boundary. It is considered that the needs of the parish outside the National Park (including Battleton) should be met within Dulverton.
- 3.39 Nevertheless, development should be of a scale that does not harm their form, setting and character. It is important to note that Exmoor’s Local Service Centres are not any larger than many villages elsewhere in Devon and Somerset, and it is only because of their isolation and/or the extent of the surrounding areas they serve that such a wide range of services has been sustained. The influence of tourism on Exmoor also improves the retail sector for the area and potentially influences the type and scale of shops and what they offer⁴⁶.
- 3.40 **Villages:** The settlements identified as Villages are smaller than Local Service Centres and their area of influence is generally smaller but they do have a number of services and facilities and act as focal points for people living across Exmoor. Some

⁴⁵ ENPA (2015) Settlement Hierarchy: Local Plan Technical Paper – *Exmoor National Park Authority, Dulverton*

⁴⁶ GVA & C4G (2011) Quantitative Needs Assessment – West Somerset Council and Exmoor National Park Authority

villages and surrounding communities function collectively by sharing their facilities. Development in the 'Villages' will help maintain or enhance their communities by providing for a diverse economy, help retain and enhance key services and facilities (which are often vulnerable to closure), and address the housing needs of local communities.

- 3.41 **Porlock Weir** has a number of shops and businesses and other community facilities; it would in other circumstances be considered as a 'Village'. However, Porlock Weir is at risk of coastal flooding and erosion over the longer term and the Draft Shoreline Management Plan⁴⁷ policy of 'no active intervention' means that the shoreline will be allowed to retreat naturally and existing defences will not be maintained or improved nor new defences provided unless other funds are available. Owing to these significant constraints, development at Porlock Weir should accord with CC-S4 (Replacement Development from Coastal Change Management Areas) to allow for the relocation of existing development and infrastructure that is at risk of being lost to coastal change or the provision of housing to address the local affordable housing needs of Porlock Weir. Additional small-scale business premises may also be considered to be acceptable where this is directly related to industries associated with Porlock Weir and where it would conserve and enhance the character of the settlement and the Heritage Coast. However, development should not result in any net loss of habitats used by barbastelle bats, or impinge on the landscape capacity/availability for relocating existing development that may be at risk of being lost to coastal change in the future (CC-S3 Porlock Weir Coastal Change Management Area). A strategy for Porlock Weir and surrounding area will be produced with the community and other relevant organisations to ensure there is a coordinated approach for the long term adaptation and relocation of buildings and other facilities (see Section 10 Exmoor's Settlements for Inset Map 15 Porlock Weir).
- 3.42 **Open Countryside:** The remaining area of the National Park is defined as 'open countryside' and will include isolated dwellings and 'building groups' such as farmsteads and hamlets. Within the open countryside a hamlet is considered to be an established, closely grouped number of dwellings within a contiguous built form, and separate from other named settlements. It is recognised that there are several hamlets in the National Park and that some farmsteads are also likely to meet the same definition. The policy approach in the Local Plan is similar for both farmsteads and hamlets, as both are located in the wider definition of the open countryside. Farmsteads should consist of a clear grouping of farm buildings with an existing dwelling.
- 3.43 Development in the open countryside is considered to be exceptional in relation to the reuse of existing buildings for residential use. Buildings in the open countryside are considered to be subject to normal policies of countryside restraint and may only be converted, where they are well related to a hamlet or farmstead, to provide homes for rural workers or people in local affordable housing need, succession farm dwellings and extended family dwellings. Small rural communities that are not identified in the settlement hierarchy, but have an established, closely grouped number of dwellings within a contiguous built form, and are separate from other named settlements, plus service provision in the form of a shop, pub or community meeting place/hall, are considered to be appropriate locations for self-build opportunities to meet local affordable housing needs in accordance with HC-D5 Custom/Self Build Local Need Housing in Rural Communities (and subject to other policy considerations).

⁴⁷ North Devon & Somerset Coastal Advisory Group (2010) North Devon & Somerset Shoreline Management Plan Review Final (October 2010) Hartland Point to Anchor Head

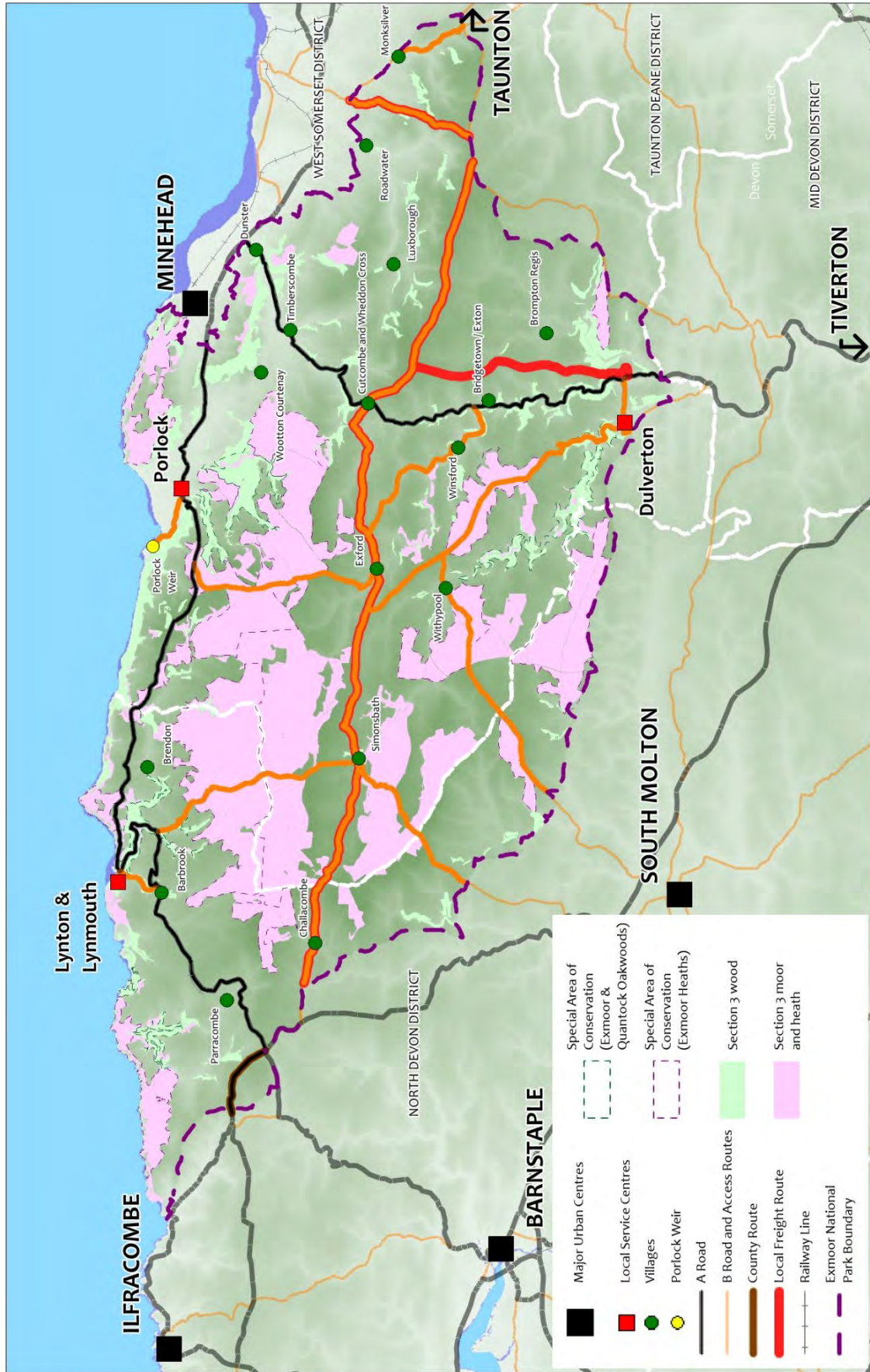
- 3.44 Development in the open countryside should be in accordance with other policies in this plan and specifically includes development that:
- a) is essential for the operation of rural land-based enterprises (HC-D8 New Build Dwellings in the Open Countryside, HC-D9 Rural Workers, HC-D10 Succession Farming – Second Dwellings on Established Farms, SE-S4 Agricultural and Forestry Development);
 - b) relates to recreation and tourism development that promotes the understanding and enjoyment of Exmoor;
 - c) involves the conversion and change of use of existing buildings for local affordable homes, extended family dwellings, business uses, visitor accommodation, and residential institutions;
 - d) forms an extension to existing dwellings or business premises;
 - e) replaces or subdivides an existing dwelling;
 - f) is regarded as householder development - including opportunities for home-based businesses;
 - g) relates to essential utilities infrastructure and renewable energy requirements; or
 - h) facilitates the small-scale extraction of building stone.

TABLE 3.1: SETTLEMENT HIERARCHY

Local Service Centres	Dulverton Lynton & Lynmouth	Porlock
Villages	Barbrook Brendon Bridgetown and Exton Brompton Regis Challacombe Cutcombe and Wheddon Cross Dunster Exford Luxborough	Monksilver Parracombe Roadwater Simonsbath Timberscombe Winsford Withypool Wootton Courtenay
Porlock Weir		

- 3.45 Please refer to Section 10: Exmoor’s Settlements for more detailed context and inset maps relating to individual settlements within the hierarchy.

Map 3.1 Key Diagram



Key Diagram

GP3 SPATIAL STRATEGY

- 1. The spatial strategy aims to ensure that communities across the National Park continue to thrive so that they are economically resilient, environmentally sustainable, socially mixed and inclusive. To facilitate sustainable development across the National Park, development proposals should accord with the spatial strategy.**
- 2. For the named settlements (listed in Table 3.1), no development boundaries will be drawn. Development proposals should ensure that the scale of development is proportionate to the settlement size and reflects the capacity of each settlement to accommodate new build development; positively responding to the surrounding landscape character, settlement form and pattern, and avoiding areas at risk of flooding.**
- 3. Development within the named settlements should address the following:**
 - a) Local Service Centres: Development should strengthen the role and function of the Local Service Centres to sustain and improve the wide range of services and facilities, to serve the needs of the settlement and surrounding communities, address locally identified needs for housing and improve employment prospects for the local area. New build development for local need affordable housing, business premises, and community services and facilities will be acceptable in principle where it is well related to existing buildings in the settlements.**
 - b) Villages: Development will contribute to and provide opportunities to address locally identified needs for housing and employment and sustain core services and facilities within these communities. New build development for local need affordable housing, business premises, and community services and facilities will be acceptable where it is well related to existing buildings in the settlements.**
 - c) Porlock Weir: Any proposals for new development will need to demonstrate that they are consistent with the principles in policy CC-S4 Replacement Development from Coastal Change Management Areas, for the replacement of development through relocation and measures for the management of buildings/facilities at risk of being lost to coastal change. Additional new build development will only be considered to be acceptable in relation to the provision of local need affordable housing and small-scale business premises that directly addresses the needs of the community; where it can be demonstrated that this will not significantly reduce the landscape capacity for relocating development at risk of being lost to coastal change identified within the Coastal Change Management Area (CC-S3) or reduce the net habitat value available to Barbastelle bats. New build housing schemes that require cross subsidy through 'principal residence housing' or 'specialist housing' will not be permitted.**
 - d) Outside the named settlements the area is identified as the Open Countryside where the focus of new build development will be on improving the sustainability of rural land-based businesses and enabling self-build opportunities for local affordable housing in sustainable locations (HC-D5, HC-D8, HC-D9, HC-D10 and SE-S4).**

THE EFFICIENT USE OF LAND AND BUILDINGS

CONTEXT

- 3.46 In promoting sustainable development, the efficient use of land is a key consideration particularly land that has been previously developed; provided that it is not of high environmental value.
- 3.47 Due to the dispersed rural settlement pattern on Exmoor there is a scarcity of brownfield or previously developed land and buildings in the National Park. However, there has historically been a high percentage of housing delivered on previously developed sites mostly through the conversion and change of use of existing buildings⁴⁸. Brownfield land within the built form of the settlements is an important resource and should be utilised for future development to: reduce the need for greenfield development; bring redundant sites back into use; and enhance settlement character and form. However, brownfield sites that have been redundant for a considerable period could consequently have a high ecological value that may require survey work to assess ecological value before being considered for development.
- 3.48 The re-use of existing buildings provides greater flexibility in terms of the uses considered acceptable in the open countryside where new build development would not otherwise be permitted except where it is considered to be essential to the operation of a rural land-based business. Not only does this approach provide a use for those redundant buildings that are well-related to an existing building group (i.e. a farmstead or hamlet), but also utilises embodied energy within existing resources, and ensures that Exmoor's landscape is conserved and enhanced (CE-S5 Principles for the Conversion or Structural Alteration of Existing Buildings).
- 3.49 The re-use of traditional agricultural buildings is considered to be greenfield development, but it recognised that such buildings can add to the important resource of existing redundant or under-used buildings within the National Park that may be appropriate for a range of future uses including local affordable homes where they meet locational criteria (HC-D7 Conversions to Dwellings in the Open Countryside).
- 3.50 An assessment of landscape sensitivity⁴⁹ for settlements was undertaken as evidence to inform the preparation of this Plan. The assessment identified areas of low, moderate and high landscape sensitivity within and around the settlements, and the landscape capacity each settlement has to accommodate small-scale new build housing development on greenfield sites. The study illustrates that there is a scarcity and finite number of suitable sites and therefore making best use of the land available to meet the needs of local communities is particularly significant. It recognised that there is often additional capacity through the redevelopment of brownfield sites, including the reuse of buildings.
- 3.51 To ensure the efficient use of land, new development within the named settlements should reflect the form and character of the built environment. Many Exmoor settlements have a traditional compact form; therefore it is unlikely to be appropriate to reinforce more recent patterns of development such as 'ribbon development' and low density suburban forms that have not been as successful in conserving or enhancing the historic settlement form and pattern or making efficient use of available land.

⁴⁸ Monitored through Exmoor National Park Authority Annual Monitoring Reports

⁴⁹ Bryan, P. (2013) Exmoor National Park Landscape Sensitivity Study, *Exmoor National Park Authority, Dulverton*

- 3.52 The density of new housing development should therefore be informed by an analysis of the surrounding built form and landscape to produce an estimate of density that would be both appropriate and achievable on the site to secure the conservation and enhancement of the National Park. This contextual approach to housing density is considered to be more appropriate within the National Park where developments are generally of a smaller scale.
- 3.53 Where larger developments for housing come forward (10 or more dwellings) then a density of at least 30 dwellings per hectare should be achieved to make best use of greenfield and brownfield sites and limited landscape capacity. This density has been shown to be achievable and successful in the context of Exmoor's settlements at, Meadow Close, Wheddon Cross and Chadwyck Close, Porlock.
- 3.54 The best and most versatile agricultural land is classified as Grades 1, 2 and 3a under The Agricultural Land Classification⁵⁰. This land is the most productive for producing food and non-food crops for future generations, and therefore development should be sought on poorer grades of agricultural land. Within the National Park there are relatively few areas of agricultural land which fall within these grades, and these are found mainly within Porlock Vale. However, agricultural land of poorer quality can be important for landscape, wildlife or the historic environment. Development should therefore safeguard areas of best agricultural land unless its development is unavoidable and alternative sustainability considerations indicate otherwise.

GP4 THE EFFICIENT USE OF LAND AND BUILDINGS

- 1. Development proposals should demonstrate the efficient use of land and buildings, including:
 - a) brownfield land located within the built extent of the named settlements that does not have a high ecological value;**
 - b) the re-use of existing buildings within the built extent of the named settlements, or within or well-related to hamlets and farmsteads.****
- 2. Development within or adjoining the named settlements should reflect the historic form and pattern of the settlement, and make best use of land on the site in terms of the density of buildings and green infrastructure provision.**
- 3. A density of at least 30 dwellings per hectare will apply to developments of 10 or more dwellings.**
- 4. Development should not result in the loss of the best and most versatile agricultural land (Grades 1, 2 and 3a) unless the development of alternative sites would conflict with National Park purposes.**

⁵⁰ Natural England (2009) Agricultural Land Classification: protecting the best and most versatile agricultural land

SECURING PLANNING BENEFITS

CONTEXT

- 3.55 All development has some impact on land and facilities. Conditions, planning obligations, and the Community Infrastructure Levy (CIL) can be used to mitigate the effects of such impacts. Planning conditions can be used to enable development proposals to proceed which might otherwise have been refused by mitigating the adverse impacts of the development. Planning obligations can also be used to mitigate the impact of unacceptable development and legislation states that planning obligations should only be sought where they meet all of the following tests:
- a) they are necessary to make the development acceptable in planning terms;
 - b) directly related to the development; and
 - c) fairly and reasonably related in scale and kind to the development⁵¹.
- 3.56 Planning obligations are delivered through section 106 (S106) agreements, and are generally used within the National Park to secure the local affordable dwellings. S106 agreements will also be used to ensure that new infrastructure required to unlock development opportunities is also delivered in the right place, at the right time, and to secure contributions towards the provision for affordable housing or to set the level of affordable housing provision where it is clearly demonstrated that cross-subsidy is required. Circumstances where planning obligations are used will vary on a case-by-case basis and may also relate to other infrastructure and enhancements required to make the development acceptable.
- 3.57 Policies HC-D1 Conversions to Dwellings in Settlements and HC-D6 Change of Use of Serviced Accommodation to Housing set out the circumstances when, through the change of use of a building to dwellings, a financial contribution may be sought in lieu of an actual on site contribution to affordable housing. These occasions are expected to be exceptional as the National Park Authority will seek all new housing development to address a local affordable need and the needed affordable housing will therefore be provided on site. Where, consistent with Policy HC-D1 and HC-D6, and only where, exceptionally, it can be demonstrated that on site provision of affordable housing through the change of use is not possible or appropriate, alternative off-site provision in the form of a financial contribution will be considered in lieu of the required affordable housing. Such circumstances will include where the scheme would provide more affordable homes than are needed in the parish and adjoining parishes. To enable scrutiny of the different elements and costs of the scheme, including site (building) values, so as to ensure that the affordable housing provision is maximised, an 'open book' approach will be required in all cases.
- 3.58 Policy GP5 sets out the principle of requiring a contribution because conversions of existing buildings to residential are generally more expensive to deliver than new build the contribution is likely to be greater than the equivalent new build value. The National Park Authority will seek provision to be local to the parish where the contribution is sought wherever possible and appropriate.

⁵¹ HM Government (2010) Statutory Instruments 2010 No. 948 Community Infrastructure Levy Regulations 2010. (Part 11 Planning Obligations), *The Stationery Office Ltd*

- 3.59 In addition to planning conditions and obligations, local planning authorities are able to introduce CIL which can be used to secure a levy from development to deliver infrastructure to support the development of the local area. However, it is not obligatory. In Exmoor National Park for example, CIL could be used for improvements and additions to: sporting and recreational facilities, open spaces, schools and other educational facilities, medical centres, transport infrastructure and flood defences. Much infrastructure is owned and/or managed by town and parish councils the district councils and county councils. The need for CIL is established through a live document known as the Infrastructure Delivery Plan which sets out existing infrastructure deficiencies and what is required for the future.
- 3.60 A community infrastructure levy CIL is generally charged on development that is over 100sq metres or for new dwellings. There are developments which do not pay into this levy which include: self-build homes, social housing, agricultural workers dwellings and charitable development. Exmoor National Park has relatively limited development, particularly of 100sqm or above and much of the housing delivered to address the affordable housing needs of local communities would be exempt from CIL. However, it is recognised that such development still has an impact on local infrastructure and the needs of local communities.
- 3.61 Given the limited level and scale of development in Exmoor National Park and that much of the local infrastructure is owned and/or managed by other local authorities, the National Park Authority will need to work with partners and review the Infrastructure Delivery Plan periodically and as appropriate, to inform its position on the CIL, including consideration of the benefits of a CIL and its impact on the viability of development in the National Park.

GP5 SECURING PLANNING BENEFITS – PLANNING OBLIGATIONS

- 1. Planning obligations will be required where they are considered reasonable, necessary and appropriate to:

 - a) ensure that development can be made acceptable in the context of conserving and enhancing the National Park and its special qualities;**
 - b) address infrastructure capacity deficits; and**
 - c) bring development in line with policy objectives.****
- 2. Where a financial contribution is required for affordable housing in accordance with other policies in this Plan, the financial contribution will, at minimum, be of an equivalent value to the affordable housing which would have been provided on site and secured through a planning obligation.**
- 3. The need for a Community Infrastructure Levy will be reviewed periodically through the Infrastructure Delivery Plan.**

4. CONSERVING AND ENHANCING EXMOOR

EXMOOR'S LANDSCAPE

Objective 1: *To conserve and enhance Exmoor's landscapes as living working landscapes that remain predominately free from intrusive developments, maintain a sense of tranquillity and protect Exmoor's dark skies.*

Objective 2: *To ensure that Exmoor's moorlands remain open, remote and relatively wild in character; that views are preserved, and strategically important areas of former moor and heath are managed in a way that restores their wilder landscape character.*

CONTEXT

- 4.1 'Policies seek to ensure that the natural beauty of Exmoor National Park is conserved and enhanced while safeguarding the National Park's Dark Sky Reserve status through reducing light pollution.
- 4.2 The European Landscape Convention (ELC)⁵² defines landscape as "an area, as perceived by people, whose character is the result of natural and/or human factors". One of the key aims of the ELC is to integrate landscape into planning policy, recognising that landscape is a fundamental component of people's surroundings. The ELC principles are particularly promoted in addressing the planning and management of National Parks.
- 4.3 National policy emphasises the need to give great weight to conserving and enhancing and scenic beauty, of National Parks. The National Parks Circular recognises the significance of the living, working landscapes of the National Parks that have been influenced over centuries by land management activities such as farming and forestry. The protection and enhancement of these unique and beautiful landscapes and dark skies are central to developing the local economy and sustaining communities whilst the diversity of the landscape character is defines the quality and distinctiveness of the place. The character of the undeveloped coast should also be maintained to protect and enhance its distinctive landscape particularly areas defined as Heritage Coast⁵³.
- 4.4 The panoramic views, skylines and dark night sky within the Exmoor National Park and the wild, remote and tranquil character of the open moorland, woodland and the undeveloped coast are important landscape qualities that are valued by local communities and visitors alike. Exmoor's natural beauty and landscape character are fundamental reasons for its National Park designation. Ensuring that the quality of the landscape is conserved and enhanced has positive implications for the local economy, particularly tourism. The relatively low level and small-scale nature of development within the National Park has limited pressure on the landscape which helps to maintain its overall character.
- 4.5 The National Park forms almost 50% of the National Character Area of Exmoor⁵⁴. The National Character Area highlights four statements of environmental opportunities that relate to landscape and wider environmental and cultural qualities of the area. Specific aspects of these opportunities include protecting, managing and enhancing the highly distinctive and diverse landscape including large areas of open 'wild' moorland, Atlantic coast, and deep wooded combes, and reinforcing the distinctive character of the mixed farmed landscape. Extreme tranquillity and dark skies are particularly identified as inspirational qualities of the area.

⁵²The UK ratified the European Landscape Convention (ELC) in 2006

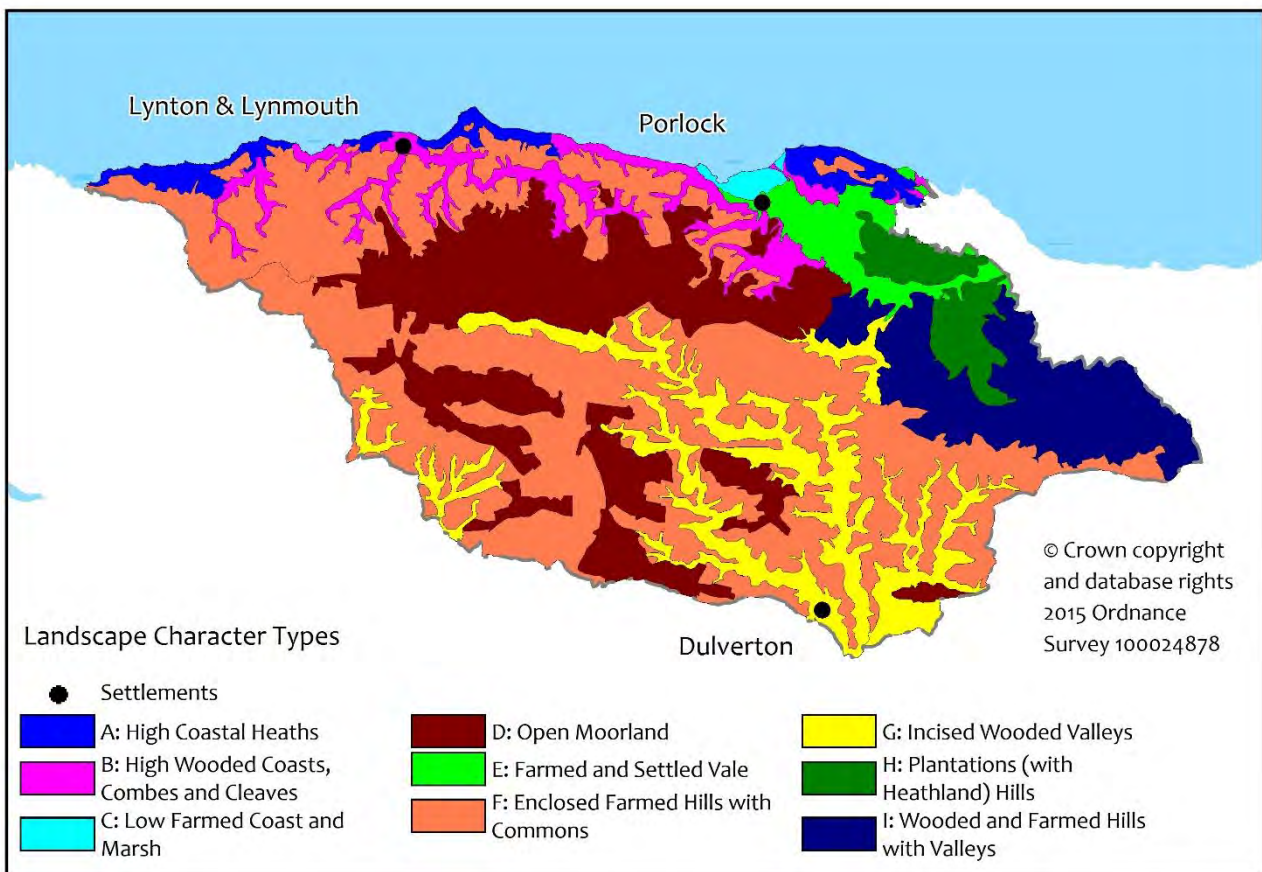
⁵³ DCLG (2012) National Planning Policy Framework. (Paragraphs 114 –115). Department for Communities and Local Government

⁵⁴ Natural England (2012) National Character Area profile 145

LANDSCAPE CHARACTER ASSESSMENT

- 4.6 Landscape Character Assessment (LCA) is central to the wider appreciation and understanding of landscapes and connection between people and place. The Exmoor National Park Landscape Character Assessment provides an evaluation of Exmoor's landscape character areas and types to provide a robust landscape framework that informs policy and decisions regarding the location and design of development and the capacity of the landscape to accept change; with the aim of reinforcing local distinctiveness.
- 4.7 The LCA identifies objectives which would benefit visual amenity and condition, thus improving landscape character.
- 4.8 The 9 separate landscape character types (with 26 landscape character areas within those types) on Exmoor are identified on map 4.1 below. Each landscape character type defined in the LCA, has key characteristics that make a particular contribution to their distinctive character. These characteristics reflect elements or combinations of elements (e.g. hedgerows, fields, rivers) that make up the landscape and should help inform proposals for the location and design of development to ensure that there is a positive relationship with their surroundings.

Map 4.1 Landscape Character Types



- 4.9 The appraisal of the landscape character types and areas shows a significant variety of landscape scene within the relatively small area of the National Park – this diversity of landscape informs Exmoor's character. However, due to the relatively limited extent of the National Park, these landscapes can be sensitive to change; including development affecting the character and appearance of the National Park's setting (within neighbouring local planning authority areas) and the visual amenities arising from

extensive views out of and into the National Park. The Exmoor Landscape Action Plan⁵⁵ takes forward recommendations from the LCA for each landscape character type, and identifies overarching quality objectives and specific actions for each of the landscape issues.

LANDSCAPE RESILIENCE

- 4.10 The landscape character approach to future development and land use change will help to create resilience to ensure that landscapes are effective at mitigating and/or adapting to the effects of climate change (CC-S1 Climate Change Mitigation and Adaptation). Opportunities to create landscape resilience can provide additional benefits for biodiversity, the economy, recreation and tourism through appropriate management, restoration, and expansion of landscapes and habitats to other ecological networks.
- 4.11 Forests and woodlands are considered to be significant in achieving a resilient and coherent ecological network across England. The National Park Circular⁵⁶ and Natural Environment White Paper⁵⁷ aim for an increase in the area of woodland in National Parks and England as a whole, better management of existing woodlands and a renewed commitment to conserving and restoring irreplaceable ancient woodlands. New and existing woodlands can provide wildlife habitats, green space for people to use and enjoy (CE-S3 Biodiversity and Green Infrastructure), help to mitigate and adapt to the future changing climate (CC-S1 Climate Change Mitigation and Adaptation) through carbon sequestration and renewable source of wood fuel, as well as a providing a supply of local timber (CE-S6 Design and Sustainable Construction Principles).
- 4.12 Other opportunities for carbon sinks (using natural carbon stores) other than planting woodland, include managing and restoring moorland and in particular areas of blanket bog or mire⁵⁸. A significant area of moorland has already been rewetted through blocking ditches with dams made from bales of natural moorland vegetation, wood and peat.

SIGNIFICANT LANDSCAPE AND SEASCAPE ATTRIBUTES

- 4.13 There are, in addition to the landscape character areas, specific landscape and seascape features and areas within the National Park that have defined attributes. There is a strong presumption in favour of the conservation and enhancement of their natural beauty and contribution to overall landscape and seascape character.
- 4.14 **Section 3 Land:** Section 3 of the Wildlife and Countryside (Amendment) Act 1985⁵⁹ requires National Park Authorities to prepare a map of any areas of “mountain, moor, heath, woodland, down, cliff or foreshore,” where these areas of natural beauty are considered particularly important to conserve. The three main categories of Section 3 Land are defined on the 1990 Section 3 Conservation Map and identified on the Policies Map as: moor and heath, woodland, and cliff and foreshore.
- 4.15 **Seascape and Heritage Coast:** Seascape is defined as ‘landscapes with views of the coast or seas, and coasts and the adjacent marine environment with cultural, historical and archaeological links with each other’⁶⁰. Exmoor has some of the most scenic, unspoilt stretches of coastline in England that is also considered as part of its spectacular seascape. Many areas of high coastal heath and woodland are in as natural a condition as possible and are important areas for wildlife. The whole coastline was defined as Heritage Coast in 1991 as identified on the Policies Map. The national

⁵⁵ ENPA (2011) Exmoor Landscape Action Plan, *Exmoor National Park Authority, Dulverton*

⁵⁶ DEFRA (2010) English National Parks and the Broads UK Government Vision and Circular

⁵⁷ DEFRA (2010) The Natural Choice: securing the value of nature

⁵⁸ Exmoor Mires Project (2015) Exmoor Mires Project: Upstream Thinking

⁵⁹ Amends section 43 of the Wildlife and Countryside Act 1981

⁶⁰ HM Government, *et al.* (March 2011): UK Marine Policy Statement. *The Stationery Office, London*

purposes of Heritage Coasts are compatible with the statutory purposes for National Parks and also reflect the socio-economic duty. Policies CE-S1 (Landscape Character) and CC-S2 (Coastal Development) aim to ensure that development proposals retain the character of the predominantly undeveloped nature of the Heritage Coast and are consistent with national purposes.

The national purposes of Heritage Coasts are to:

- *Conserve, protect and enhance the natural beauty of the coasts, their marine flora and fauna, and their heritage features.*
- *Facilitate and enhance their enjoyment, understanding and appreciation by the public.*
- *Maintain and improve the health of inshore waters affecting Heritage Coasts and their beaches through appropriate environmental management measures.*
- *Take account of the needs of agriculture, forestry and fishing, and of the economic and social needs of the small communities on these coasts.*

- 4.16 Marine Plans will help integrate marine and land planning, contributing to vibrant coastal communities and consideration of cultural heritage, seascape and local environmental quality⁶¹. The Authority supports the formation of marine protected areas (including Marine Conservation Zones) and will work with the marine planning authority to ensure that Exmoor's high quality seascape is maintained.
- 4.17 The Coastal Concordat for England⁶² sets out key principles relating to how regulatory and advisory bodies propose to work with local planning authorities to enable sustainable growth in the coastal zone. It forms an agreement to nominate one lead authority for the consenting phase of development and will not apply to projects that are solely terrestrial. National Parks England is a signatory to the concordat.
- 4.18 **The Landscape Setting of Exmoor's Settlements:** The landscape setting of Exmoor's towns and villages is a significant aspect of their overall character and form. A Landscape Sensitivity Study⁶³ has been undertaken for settlements⁶⁴ within the National Park based on landform, vegetation, scale, historic character, materials, design styles, surrounding enclosure patterns, shape and form of the settlement, as well as landscape quality and condition. Landscape sensitivity is the degree to which a particular landscape character type or area can accommodate change without unacceptable detrimental effects on character. This study has taken into account the landscape value and sensitivity of each settlement in its wider setting to provide an informed judgement in relation to future landscape capacity to accommodate small-scale housing development within or adjoining the existing settlement whilst conserving landscape character⁶⁵.
- 4.19 **Historic Field Patterns and Boundary Features:** Exmoor has around 4000km of hedgerows and boundary features. Hedgerows, particularly the ancient mixed species hedge banks and the typical beech hedge banks on the farmed hills and vale of Exmoor, are a significant landscape characteristic⁶⁶ and form a strong landscape pattern including intricate field patterns that surround many small hamlets and villages. Hedgerows are important features of narrow rural roads, lanes and some rights of way – channelling and framing views of the wider landscape; often with significant trees

⁶¹ HM Government *et al.* (March 2011) UK Marine Policy Statement (Para 2.5.7). *The Stationery Office, London*

⁶² DEFRA (2013) A Coastal Concordat for England

⁶³ Bryan, P. (2013) Exmoor National Park Landscape Sensitivity Study 2013, *Exmoor National Park Authority, Dulverton*

⁶⁴ The Landscape Sensitivity Study includes all Local Service Centres, Villages and Porlock Weir

⁶⁵ Bryan, P. (2013) Exmoor National Park Landscape Sensitivity Study 2013, *Exmoor National Park Authority, Dulverton*

⁶⁶ ENPA (2007) Exmoor National Park Landscape Character Assessment, *Exmoor National Park Authority, Dulverton*

(standards) which are a strong feature of many hedges and a key aspect of their character. The built character of many settlements in the National Park is enhanced by boundary treatments such as traditional stone walling, the style of which varies according to the type of local stone available.

- 4.20 Important hedgerows, as defined by the Hedgerow Regulations⁶⁷ are generally protected so they cannot usually be removed or breached without consulting the planning authority. Agri-environment schemes have also contributed towards the long term management of hedgerows across the National Park. Development should conserve boundary features which contribute to landscape character, and utilise such features to ameliorate and enhance any landscape works as part of the proposal.
- 4.21 **Important Trees, Tree Groups and Orchards:** Trees and woodland are significant features of the Exmoor landscape, and one of the most valued aspects of the National Park. Most woodland areas have a range of protection measures through designations as Special Areas of Conservation, Sites of Special Scientific Interest, Local Wildlife Sites (CE-S3 Biodiversity and Green Infrastructure) or Section 3 woodland. Development proposals that may affect important trees or tree groups should have regard to the British Standards Institute publication relation to construction⁶⁸.
- 4.22 Veteran trees (very old trees of cultural and/or biological interest), orchards, parklands, copses and individual trees are important distinctive cultural and landscape features in their own right and are often important habitats. Over 1600 veteran trees have been recorded on Exmoor, and proposals for development or change of land use should ensure that no harm is caused to these trees. Veteran trees are found throughout the countryside, and often in more formally designed parkland and wood pasture landscapes.
- 4.23 Some individual trees and tree groups are formally protected by Tree Preservation Orders (TPOs) or if they are located within a Conservation Area. Any proposed works to trees protected by TPOs usually require consent from the planning authority, whilst six weeks prior notice is required for works to trees within a Conservation Area to enable the Authority to consider whether a TPO should be made⁶⁹. TPOs can be made by the Authority where it is considered that there are threats to individual trees, groups of trees or woodlands, which are considered to be in the interests of amenity.
- 4.24 Traditional orchards are a landscape feature of lower farmland areas within the National Park, particularly within the Vale of Porlock. Many orchards and remnants of orchards are associated with settlements and farmsteads, which reflect their past significance to the local economy – they are also important for their cultural interest and contribution to local amenity and biodiversity. A comprehensive Orchard Report⁷⁰ has been undertaken to review, identify and assess the importance of orchards in the landscape. This evidence has informed the areas of orchard defined on the Policies Map which will be protected from development proposals that would impact on their landscape value.

⁶⁷ HM Government (1997) Statutory Instruments 1997 No. 1160 - The Hedgerow Regulations 1997

⁶⁸ British Standards Institute (2012) BS5837:2012 Trees in relation to design, demolition and construction – Recommendations. BSI.

⁶⁹ DCLG (2012) Protected Trees: A guide to tree preservation procedures

⁷⁰ ENPA (2013) Review of the Orchard of Landscape Importance in Exmoor National Park, *Exmoor National Park Authority, Dulverton*

LANDSCAPE EFFECTS

- 4.25 Consultation⁷¹ has highlighted the importance of protecting Exmoor's landscapes from intrusive development and the cumulative impact of man-made structures. Partnership working is an important means of helping to ensure that small-scale, incremental change does not have a detrimental cumulative impact on landscape and seascape character – for example guidelines have been drawn up in partnership with the Greater Exmoor Shoot Association to minimise the potential impact of game bird rearing and shooting activities on the National Park and its users⁷².
- 4.26 Development pressures close to the National Park, including those arising from large scale renewable energy technologies are a cause for concern particularly in relation to Exmoor's setting within surrounding local planning authority areas. The National Park Authority will work with partners, neighbouring planning authorities and the Marine Management Organisation (through the Duty to Cooperate) to help protect the character and visual amenity of the landscape and seascape, that has an important role as the setting to Exmoor National Park. The Authority has liaised with both highway authorities (Devon and Somerset County Councils) to develop a more sensitive approach to signage and road management on Exmoor (AC-S2 Transport Infrastructure). The Authority has also worked with infrastructure organisations to facilitate undergrounding of overhead power and telecommunication lines for certain areas. Funding available to underground electricity lines in AONB's and National Parks in the South West is focused on iconic sites. Exmoor has benefitted from this fund for undergrounding schemes within the Dulverton conservation area, Hawkcombe and Porlock Marsh (AC-D6 Fixed Line Transmission Infrastructure).

IMPACTS ON LANDSCAPE AND VISUAL AMENITY

- 4.27 While often development can and with care be accommodated in the landscape, other developments can potentially have unacceptable adverse impacts on landscape character and visual amenity due to their scale, massing, siting, materials, colour or arrangement and therefore could appear to be incongruous within Exmoor's landscape. Potential impacts will vary on a case by case basis according to the type of development and the sensitivity of the surrounding landscape. Some of these effects may be minimised by addressing the particular landscape or visual amenity issues raised by a proposed development.
- 4.28 Large-scale developments such as agricultural buildings and equestrian exercise arenas have the potential to generate significant landscape effects unless particular care is taken to ensure it is well related to existing buildings, well screened by existing features, and the level of excavation required is minimal. The colour of building/surfacing materials and design of boundary treatments also need to be carefully selected to minimise the visual impact of such facilities (policies SE-S4 Agricultural and Forestry Development; RT-D11 Equestrian Development).
- 4.29 The effects of vertical structures such as wind turbines, telecommunication masts, which can have a utilitarian appearance that contrasts to rural surroundings, will depend on where they can be viewed from and who will see them. These types of developments are challenging in that they require height to maximise the effectiveness of their operation. The important aspects are limiting the visibility of such structures in the landscape through visual integration such as grouping with surrounding features

⁷¹ ENPA (2010) Your Future Exmoor (YFE) consultation events January – March 2010

⁷² ENPA (2007) – The Exmoor Guidelines for the Management of Gamebirds within the National Park, *Exmoor National Park Authority, Dulverton*

with strong vertical prominence, including trees and existing buildings – the long term management of any planting which helps to screen and integrate these structures is essential. The surrounding landform is also significant particularly open moorland landscapes which have a horizontal emphasis of ridges, plateaux and smooth horizons that would have a high sensitivity to change compared with areas with more existing activities and structures. The material specification, colour and other aesthetic qualities including design can help to minimise visibility and ensuring that such structures do not break the skyline from sensitive view-points such as access land and rights of way (for further detail on these specific structures see policies CC-D3 Small Scale Wind Turbines and AC-D5 Radio and Mobile Telecommunications Infrastructure).

- 4.30 Cumulative landscape and visual effects are combined effects that arise through the interaction of two or more developments, whether of the same type or not, and should be considered in terms of the capacity of the landscape to accommodate change without unacceptable adverse harm to landscape character. Cumulative landscape effects refers to the effects of a proposal on the landscape fabric, character and quality and so concerns the degree to which the development becomes a significant or defining characteristic of the landscape, a feature in particular views, and the effect this has upon the people experiencing them. Sequential visual effects are associated with the recurrence of developments when moving through a landscape and how these are experienced along transport routes, public rights of way and access land.
- 4.31 Many proposed developments within the National Park will not necessarily result in cumulative or sequential landscape effects – this is most applicable to both large scale and vertical structures highlighted above, but may also arise through other types of development such as solar arrays (CC-D4). Applications should demonstrate that any potential incompatibilities and discord within the landscape that may arise from cumulative and sequential landscape/visual effects is minimised through effective design and siting so they will not detract from the natural beauty of the National Park.

CE-S1 – LANDSCAPE CHARACTER

- 1. The high quality, diverse and distinct landscapes and seascapes of Exmoor National Park will be conserved and enhanced.**
- 2. Development should be informed by and complement the distinctive characteristics of the Landscape Character Types and areas identified in the Exmoor National Park Landscape Character Assessment (LCA).**
- 3. Development proposals should also have regard to, and be appropriate in terms of impact with the conservation of significant landscape and seascape attributes.**
- 4. Opportunities to conserve, enhance and restore important landscapes and landscape characteristics as identified in the LCA, including minimising existing visual detractions, will be encouraged.**

CE-D1 PROTECTING EXMOOR'S LANDSCAPES AND SEASCAPES

- 1. Development will be permitted where it can be demonstrated that it is compatible with the conservation and enhancement of Exmoor's landscapes and seascapes through ensuring that:
 - a) the visual impact of the development in its immediate and wider setting is minimised through high quality design that reflects local landscape character with particular regard to scale, siting, materials, and colour; and**
 - b) the cumulative and/or sequential landscape and visual effects of development do not detract from the natural beauty of the National Park and the experience of tranquillity.****
- 2. Within Exmoor's Heritage Coast development should be appropriate to the coastal location and conserve the undeveloped nature of the coast consistent with Heritage Coast purposes.**
- 3. Landscaping schemes should reinforce local landscape or seascape character and where these are required, conditions will be attached to protect important landscape characteristics and elements and whether appropriate replacement or additional landscape elements will be required.**
- 4. Proposals which are considered to be significant in terms of scale and/or impact should provide a professional landscape appraisal as part of the application submission.**

PROTECTING EXMOOR'S DARK NIGHT SKY

CONTEXT

- 4.32 The remote, open landscapes of the moorland and lack of human habitation have helped to define a 'core dark sky area' within the National Park as part of the Dark Sky Reserve, which Exmoor National Park was awarded in 2011. The Dark Sky Reserve status has provided an important boost to tourism, attracting visitors to experience Exmoor's dark night sky and inspiring interest in astronomy.
- 4.33 A critical buffer zone around this core area has also been established which only includes minor settlements. The identification of these areas has informed the Lighting Management Plan that specifies appropriate lighting methods and management within the National Park (see Map 4.2 Dark Sky Core Area and Core Buffer Zone).
- 4.34 The Royal Commission on Environmental Pollution (RCEP) describes light pollution as the experience of light in the wrong place or at the wrong time; both the timing of illumination and the actual level of light are important factors. Light pollution is an important and avoidable consequence of poor lighting design, often exacerbated by poor installation and maintenance. The RCEP report⁷³ recommends that those responsible for the management of existing National Parks seek to eliminate unnecessary outdoor light and to better design and manage that which cannot be eliminated. The number of forms that light pollution can take from both diffuse and point sources are identified as:
- a) Glare: The excessive contrast between bright and dark areas in the field of view.
 - b) Light trespass: Unwanted light, for example from adjacent properties and activities.
 - c) Light clutter: The excessive grouping of lights.
 - d) Light profligacy: Over-illumination which wastes energy and money.
 - e) Sky glow: A combination of reflected and refracted light from the atmosphere. A major effect of sky glow at night is to reduce contrast in the sky. This is the most pervasive form of light pollution and can affect areas many miles from the original light source.
- 4.35 Light pollution is also known to adversely impact on wildlife and their habitats which has been recognised by a number of research studies and reports. Since many species are already declining and are protected by legislation, this represents a further pressure on remaining populations.
- 4.36 Bats are an example of nocturnal mammals that are likely to be disturbed by the presence of external lighting and could be deterred from using established foraging areas⁷⁴. Lighting such as security lighting, sports floodlighting on premises, and lighting directed towards roosts are likely to reduce the time available for feeding. Some species will also actively avoid lit areas, which have implications for foraging and commuting⁷⁵.

⁷³ The Royal Commission on Environmental Pollution (2009) Artificial Light in the Environment. *The Stationery Office Ltd*, London

⁷⁴ Bat Conservation Trust (2009) Bats and Lighting in the UK

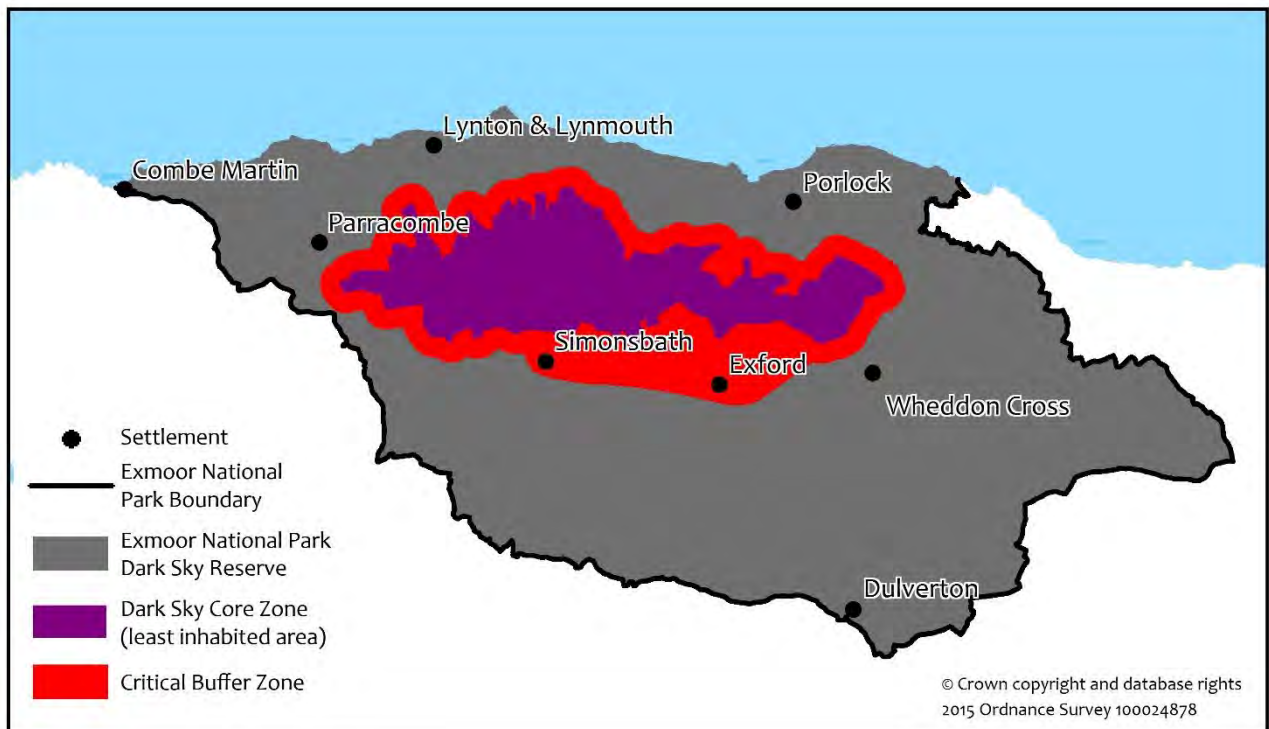
⁷⁵ Natural England (2014) Bats: protection, surveys and licences

- 4.37 The Night Blight Report⁷⁶ also raises further concerns regarding poor lighting design and unnecessary external illumination, such as the waste of energy and contribution to air pollution and climate change. Ensuring lighting is appropriate for its purpose and energy efficient, will also help to reduce carbon emissions and contribute to climate change mitigation.
- 4.38 Consultation⁷⁷ demonstrated a high level of support for reducing street lighting in terms of the number of street lights, and the time they are operational, although a number of smaller settlements on Exmoor have no street lighting. The National Park Authority will continue to work with the highway authorities and local communities on proposals to manage and where possible reduce lighting within streets and car parks. Devon and Somerset County Councils are both reducing the environmental impact of street lighting through light dimming, converting lamps to more efficient bulbs, and part-night lighting. Part night-lighting has already been implemented in several communities across Exmoor.
- 4.39 Other forms of light pollution arise from sources such as: the illumination of buildings, light spill from internal lighting in agricultural and other non-residential buildings, security lighting, and flood-lit areas. Any necessary new lighting associated with new development can be managed through appropriate lighting technology and restrictions on the duration of use. Where light pollution already exists, the Authority will promote the use of the Lighting Management Plan to inform the public about ways to reduce energy and use lighting more effectively.
- 4.40 Applicants will be expected, as part of their proposals, to set out any lighting proposals and demonstrate that they accord with best practice. Planning conditions will be attached to any approval to ensure that any lighting will be appropriately designed and managed to limit impacts on Exmoor's Dark Sky Reserve, local amenity, landscape character, cultural heritage, and wildlife. Preventing light pollution will help to conserve and enhance the setting of the historic environment, and this will be an important consideration for any new lighting proposed as lighting can enhance as well as detract from historic buildings. Any lighting will need to be appropriate to the integrity of heritage assets (policies CE-S4 and CE-S3) and minimise light spillage.
- 4.41 Policy CE-S2 refers to further detailed guidance in the Lighting Management Plan which provides technical advice to inform external lighting requirements for future development and seek to manage existing external lighting with building advice from the Institute of Lighting Professionals, and with the input of Devon County Council and Somerset County Council lighting professionals. Where external lighting cannot be managed through planning conditions, the Lighting Management Plan (LMP) provides guidelines for property owners and organisations responsible for other forms of outdoor lighting. These include reducing the intensity of external lighting and specifications for shielding with hoods or reflectors. The LMP also identifies the Dark Sky Core Zone and Critical Buffer Zone (Map 4.2 below) and the management of lighting within these areas.
- 4.42 Where external artificial illumination can be justified in terms of meeting safety requirements or improving accessibility to community facilities – it should meet the objectives of the policy and the requirements of the Lighting Management Plan.

⁷⁶ Campaign to Protect Rural England and the British Astronomical Association (May 2003): Night Blight!

⁷⁷ ENPA (2010) Your Future Exmoor: Exmoor National Park Feedback Report, *Exmoor National Park Authority, Dulverton*

Map 4.2 Dark Sky Core Area and Core Buffer Zone



CE-S2 PROTECTING EXMOOR'S DARK NIGHT SKY

- 1. The tranquillity and dark sky experience of the National Park, and its status as an International Dark Sky Reserve, will be maintained and improved.**
- 2. Development proposals should seek to reduce light spillage and eliminate all unnecessary forms of artificial outdoor lighting in the National Park by ensuring that:**
 - a) The Dark Sky Core Zone is protected from permanent illumination.**
 - b) External lighting within the Dark Sky Critical Buffer Zone is strictly controlled.**
 - c) Good lighting management and design is applied throughout the National Park to avoid unacceptable adverse impacts on:**
 - i) the visual character of the landscape, seascape, and historic built environment;**
 - ii) wildlife and habitats; and**
 - iii) local visual amenity and safety.**
- 3. Development proposals that involve external lighting, outside the Dark Sky Core Zone, will only be permitted where it can be demonstrated that they are required for safety, security or community reasons and where the details minimise light spillage; having regard to the Lighting Management Plan guidance.**

WILDLIFE, GEOLOGICAL CONSERVATION AND GREEN INFRASTRUCTURE

Objective 3: *To protect and enhance Exmoor's wildlife and habitats and seek to improve the diversity, extent, condition and connectivity of Exmoor's important and valued habitats.*

Objective 4: *To maintain or increase the populations of native wildlife species on Exmoor that are valued for their conservation status and local distinctiveness, and control and eradicate non-native species.*

CONTEXT

4.43 All public authorities, including Exmoor National Park Authority, have a biodiversity⁷⁸ duty which requires them to, 'have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'⁷⁹. The UK's commitment to the conservation of biodiversity is delivered through the Government's Biodiversity Strategy⁸⁰ which sets an ambition to halt overall loss of England's biodiversity by 2020 and to move to a position of net biodiversity gain in the longer term, supporting a more integrated landscape-scale approach to conserve habitats on land and at sea, and improving links between them. This strategy will help nature to better withstand future environmental pressures such as climate change and provide a wider context for conservation work. The NPPF is clear that planning should contribute to conserving and enhancing the natural and local environment, improving biodiversity by minimising impacts on biodiversity, providing net gains for nature, protecting geological conservation, and contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. Biodiversity is also of value to the local economy, in terms of the important habitats and wildlife that are appreciated by people living in and visiting the area, but also in terms of the ecosystem services they provide.

INTERNATIONALLY AND NATIONALLY DESIGNATED BIODIVERSITY ASSETS ON EXMOOR

- 4.44 Some of Exmoor's wildlife is given special consideration through a hierarchy of site designations which confer different levels of protection in recognition of their international, national or local importance.
- 4.45 Special Areas of Conservation (SACs)⁸¹ are designated to protect the distinctive wildlife which can be found in these specific habitats – these are Exmoor Heaths SAC and Exmoor and Quantock Oakwoods SAC. The combined areas of SACs cover around 12,600 ha of Exmoor. Legislation restricts the granting of permission for development which is likely to significantly affect a SAC and which is not directly connected with or necessary to the management of the site for nature conservation. The environmental effects of any proposed development likely to have a significant effect on a SAC (including their qualifying species) alone or in combination with other projects, will be subject to the most rigorous examination by the National Park Authority, as set out in

⁷⁸ Biodiversity means the variety of life on earth, and is used here to refer to the diversity of wildlife and habitats found on Exmoor

⁷⁹ HM Government (2006) Natural Environment and Rural Communities Act 2006 (Section 40) – *The Stationery Office Limited*. London

⁸⁰ DEFRA (2011) Biodiversity 2020 – A Strategy for England's Wildlife and Ecosystem Services

⁸¹ European Commission (1992) EC Council Directive on the Conservation of Natural Habitats and Wild Fauna and Flora (92/43/EEC). *Official Journal of the European Communities*

the Habitats Regulations⁸², and is subject to separate statutory procedures including Appropriate Assessment. National planning policy states that development likely to have a significant effect on sites protected under the Habitats Directives would not be sustainable under the terms of the presumption in favour of sustainable development⁸³.

- 4.46 Ecological Zones of Influence (EZI) have been identified for the Exmoor and Quantock Oakwoods SAC. These zones are areas outside the designated SAC, which nonetheless if affected can adversely impact on the integrity of the site's conservation objectives, as species are not necessarily limited by the designated site boundary. Two of the qualifying feature species, Barbastelle bat and Otter have dispersal areas which are used to delineate the EZI. A 'test of likely significance' within the EZI under the provisions of the Habitats Regulations 2010 may be required for an application falling within these zones (see Exmoor National Park Local Plan Habitat Regulations Assessment).
- 4.47 Sites of Special Scientific Interest (SSSIs)⁸⁴ are designated by Natural England for their ecological or geological value. They form a national network of sites which represent the best examples of natural features, including wildlife habitats, geological features and landforms, in the country. Some SSSIs are also designated as National Nature Reserves (NNRs) due to their nature conservation or geological interest, and are intended to provide opportunities for the public to enjoy and experience these interests. The total area of the National Park designated by UK and European law to protect wildlife is over 19,300 ha (about 28% of the National Park), including three NNRs.
- 4.48 Legislation⁸⁵ imposes a number of obligations and restrictions on owners, occupiers and public bodies regarding any activities that may affect SSSIs. Development proposals should conserve and respond to opportunities to enhance SSSIs through the planning system. Where a development proposal may adversely affect a SSSI, the applicant will be required to provide an assessment of the likely impacts of the proposal, and possible measures to avoid damaging effects. Development proposals likely to affect a SSSI will be subject to the most rigorous examination by the National Park Authority.
- 4.49 Ancient woodland and veteran trees are also afforded a high level of protection reflecting national planning policy and guidance and a renewed government commitment⁸⁶ to policies in the report *Keepers of Time*⁸⁷. The definition of ancient woodland also includes ancient semi-natural woodland (ANSW) and plantations on ancient woodland sites (PAWS) which will be treated equally in terms of the level of protection afforded to ancient woodland and veteran trees⁸⁸.
- 4.50 *Unlocking the Potential of Exmoor's Woodlands*⁸⁹, reports that 'ancient woodland' including ASNW and PAWS represent a highly important component of Exmoor's woodlands. There are 2,004 ha of ASNW within the National Park and 1,346 ha of PAWS sites that consist of more than one third of the woodlands of Exmoor. Many of the larger ancient woodlands are of very high ecological interest and have been designated in recognition of their importance with 1668ha of ancient woodland designated as a SAC. Priorities of 'protect, improve and expand' are relevant policy

⁸² HM Government (2010) Statutory Instruments 2010 No.490. The Conservation of Habitats and Species Regulations. *The Stationery Office Limited*. London

⁸³ DCLG (2012) National Planning Policy Framework. (Paragraph 119). Department of Communities and Local Government

⁸⁴ Designated under the Wildlife and Countryside Act 1981

⁸⁵ Wildlife and Countryside Act 1981, as amended by the Countryside and Rights of Way Act 2000 and Natural Environment and Rural Communities (NERC) Act 2006

⁸⁶ DEFRA (2013) Government Forestry and Woodlands Policy Statement

⁸⁷ DEFRA & Forestry Commission (2005) *Keepers of Time: a statement of policy for England's ancient and native woodland*

⁸⁸ Natural England (2014) *Standing Advice for Ancient Woodland and Veteran Trees*

⁸⁹ Silvanus *et al.* (2013) *Unlocking Exmoor's Woodland Potential: Final Report, Exmoor National Park Authority, Dulverton*

considerations to protect ancient woodlands and veteran trees from development and the threats of climate change, improve the restoration of PAWS and expand the connectivity of ancient woodlands in the landscape.

SPECIES PROTECTION

- 4.51 Within the National Park there are a number of rare, localised and characteristic plant and animal species, many of which are protected by legislation. Endangered species, protected by legislation⁹⁰, may be found in areas that do not receive special protection. Priority species on Exmoor includes some legally protected species, and those that have been identified as important or rare in a national context.
- 4.52 The National Park Authority is obliged under legislation⁹¹ to have regard for the provisions of the Habitats Directive which includes the maintenance of 'Favourable Conservation Status' of European protected species, i.e. the populations of such species and the habitat to support them are maintained – these include dormice, otters and all UK species of bats, (17 out of 18 bat species are found on Exmoor). This is separate from any subsequent licensing requirements. Developers will be expected to provide data with an application to enable an assessment to be carried out. European protected species are also afforded protection from deliberate disturbance likely to significantly affect the local distribution or abundance of the species to which they belong.

EXMOOR'S PRIORITY HABITATS AND SPECIES

- 4.53 The Exmoor priority species and habitats lists have been produced as part of the development of the Exmoor Wildlife Research and Monitoring Framework⁹²; these lists were derived from the Exmoor Biodiversity Action Plan⁹³ and their purpose is to identify:
- a) Those species and habitats on Exmoor which are nationally or internationally important in biodiversity terms,
 - b) Populations that have reduced to levels of serious concern; and
 - c) Populations which would achieve most for biodiversity conservation if targeted for local action.
 - d) National priority habitats and species⁹⁴ are identified on the England Biodiversity List⁹⁵ and those relevant to Exmoor are included within the priority habitats and species lists for Exmoor.
- 4.54 There are 29 priority habitats on Exmoor and these are listed in Table 4.1 below; some of which will already be within internationally, nationally and locally designated sites (e.g. SACs, SSSIs and local wildlife sites).

⁹⁰ Certain plants and animal species, including all wild birds, are protected under the Wildlife and Countryside Act 1981. European plant and animal species are protected under the Conservation of Habitats and Species Regulations 2010. Some other animals are protected under their own legislation, for example the Protection of Badgers Act 1992

⁹¹ HM Government (2010) Statutory Instruments 2010 No.490 - Conservation of Habitats and Species Regulations 2010 (Regulation 9). *The Stationery Office Limited, London*

⁹² ENPA (2014): Exmoor Wildlife Research and Monitoring Framework 2014 – 2020 – Exmoor National Park Wildlife Report Series No 1, *Exmoor National Park Authority, Dulverton*

⁹³ ENPA (2001) Exmoor Biodiversity Action Plan, *Exmoor National Park Authority, Dulverton*

⁹⁴ Listed as Habitats and Species of Principal Importance in Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006

⁹⁵ DEFRA: EXPLANATORY NOTE - Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 - Habitats and Species of Principal Importance in England

Table 4.1 Exmoor's Priority Habitats

Broad Habitat	Priority Habitat Name
Arable and horticulture	Arable field margins
Arable and horticulture	Traditional orchards
Boundary	Hedgerows
Coastal	Coastal saltmarsh
Coastal	Coastal vegetated shingle
Coastal	Intertidal mudflats
Coastal	Maritime cliff and slopes
Freshwater	Ponds
Freshwater	Rivers
Grassland	Lowland calcareous grassland
Grassland	Lowland dry acid grassland
Grassland	Lowland meadows
Grassland	Purple moor-grass and rush pastures
Heathland	Lowland heathland
Heathland	Upland heathland
Inland rock	Inland rock outcrop and scree habitats
Marine	Intertidal boulder communities
Marine	<i>Sabellaria alveolata</i> reefs
Marine	<i>Sabellaria spinulosa</i> reefs
Marine	Subtidal sands and gravels
Wetland	Blanket bog
Wetland	Coastal and floodplain grazing marsh
Wetland	Lowland fens
Wetland	Upland flushes, fens and swamps
Woodland	Lowland mixed deciduous woodland
Woodland	Upland mixed ashwoods
Woodland	Upland oakwood
Woodland	Wet woodland
Woodland	Wood-pasture and parkland

4.55 There are 198 species on the Priority Species list in the Exmoor Wildlife Research and Monitoring Framework⁹⁶ - the list encompasses the range of internationally and nationally protected species found on Exmoor in addition to those that are not legally protected but are of biodiversity importance on Exmoor. The Priority Species list will be used as a tool to guide conservation action in the future and to prevent accidental loss through development.

LOCAL SITES

4.56 **LOCAL WILDLIFE SITES:** There are over 500 Local Wildlife Sites (formerly known as County Wildlife Sites) on Exmoor, which are sites of significant nature conservation value. Although they do not have any statutory status, many are equal in quality to the representative sample of sites that make up the series of statutory SSSIs. Local Wildlife Sites are identified by local partnerships and provide a more comprehensive suite of sites, as well as representing local character and distinctiveness. They have a

⁹⁶ Exmoor National Park Authority (2014) Exmoor Wildlife Research and Monitoring Framework, *Exmoor National Park Authority, Dulverton*

significant role in meeting national and local biodiversity targets, and importantly form part of the ecological network that links and supports the nationally and internationally designated sites. They also contribute to the quality of life and the well-being of the community, with many sites providing opportunities for research and education.

- 4.57 A number of non-statutory nature reserves have also been established in the National Park, although many are on areas designated as SSSIs which provide the legal protection set out above.
- 4.58 SITES OF GEOLOGICAL OR GEOMORPHOLOGICAL INTEREST: Exmoor has a number of Regionally Important Geological Sites (RIGS) which have been identified by Local Geo-conservation Groups for their geological (rocks, minerals, fossils), or geomorphological (land form, processes) interest. A number of geological sites are nationally important and are designated as SSSIs and receive full legislative protection, whilst RIGS are local, non-statutory geological sites. Geological sites are an important educational resource for research, understanding natural processes and stimulating public interest in geology. They can also be a recreational and inspirational resource. Geological sites should be safeguarded to allow ongoing scientific and education use of these resources and effective management in terms of recreational use to ensure impacts do not damage important geomorphological features.

BIODIVERSITY CONSIDERATIONS

- 4.59 The National Park Authority will work with adjoining authorities, local communities and land managers, the private sector and conservation organisations to identify and take forward opportunities for biodiversity enhancement where this is consistent with landscape character (policy CE-S1). The Biodiversity Strategy 2020 encourages the establishment of Nature Improvement Areas (NIAs) by local partnerships, based on a local assessment of opportunities for restoring and connecting nature on a significant scale. Applicants are advised to check with the National Park Authority as to whether any NIAs have been agreed.
- 4.60 The hierarchy of wildlife sites on Exmoor is shown on the Policies Map. In considering applications affecting the natural environment, the National Park Authority will seek to minimise impacts on biodiversity and provide net gains in biodiversity, where possible.
- 4.61 Applications for development should ensure that sufficient information is provided regarding the wildlife sites or species that may be affected by a proposal. Pre-application discussions can prevent delays and help ensure that planning applications are submitted with adequate information on biodiversity and geological impacts. In some cases (for example if proposals may affect a SSSI), it may be appropriate to include third parties, such as Natural England, in these discussions. Pre-application enquiries can help ascertain whether a European protected species, species identified as important or rare in a national context, or locally important on Exmoor, is present on site. Where such a species may be present, the application should be informed by an ecological survey prepared by a suitably qualified consultant to assess this. The National Park Authority has produced a Biodiversity Checklist to assist the preparation of a planning application in considering whether a proposal is likely to affect any priority or protected species/habitats and if further surveys are necessary. Applications should show how the proposal has taken this evidence into account through its design and any mitigation or compensation proposed. The re-use of buildings and previously developed land (GP4 The Efficient Use of Land and Buildings) in particular would require careful assessment of any existing wildlife interest.
- 4.62 The National Park Authority will expect that proposals clearly demonstrate that they will not result in the disturbance or killing of a protected, priority or locally important species, or damage to or destruction of their breeding sites or resting places. If

proposals are likely to result in the disturbance or killing of a European protected species or damage to its habitat then a licence will usually be required from DEFRA. A licensing regime also applies to badgers through the Protection of Badgers Act 1992. There may be circumstances where the National Park Authority would support removal of invasive species as part of applications, where this would support National Park purposes and enhance biodiversity. The re-use of buildings and previously developed land in particular would require careful assessment of any existing wildlife interest.

- 4.63 The National Park Authority will work in close collaboration with Natural England and non-statutory conservation agencies such as the Somerset and Devon Wildlife Trusts, the RSPB, and recognised local experts as appropriate, as well as using its own specialist knowledge in assessing the likely impact of development proposals.

MITIGATION AND COMPENSATION

- 4.64 As a principle in the National Park, all development should avoid harm to biodiversity or geological interest. However, in very exceptional circumstances, where it is judged that the wider benefits of a proposed development clearly outweigh the loss or damage to sites, species and features included in Policy CE-S3, measures will be sought to minimise the impacts (mitigation) and compensate for any residual impacts. Compensatory measures may be required in advance of the development in appropriate cases. Long term site management and monitoring may also be required, in order to ensure that the compensatory measures achieve their objectives. To this end, the National Park Authority will seek to attach conditions and legal agreements to any granting of planning permission. The irreplaceable nature of some habitats (e.g. ancient woodland or veteran trees) means that loss or damage cannot simply be rectified by mitigation and compensation measures⁹⁷ and in those circumstances where harm cannot be adequately mitigated or compensated for, planning permission will be refused.

ECOLOGICAL NETWORKS

- 4.65 Biodiversity 2020⁹⁸ highlights the need for coherent and resilient ecological networks to move from a position of net biodiversity loss to net gain. Conserving existing international, national and local wildlife sites alone will not be sufficient to maintain or enhance biodiversity over the longer term given threats of habitat shift and species migrations arising from climate change and other pressures including invasive species. The long standing approach of safeguarding protected sites has preserved particular areas of good quality habitat, but done little to maintain surrounding, supporting habitats on a landscape scale. As such, protected sites and the species populations they support exist in isolation, kept separate from other areas of hospitable habitat by surrounding land uses that are less hospitable. This means that whilst the National Park has a rich assortment of wildlife habitats, they tend to exist in patches rather than continuous swathes, which presents a problem to animals and plants. All species need to disperse and colonise new areas in order to maintain healthy populations, or to escape from threats such as disease outbreaks, or impacts arising from climate change. However, isolated patches make dispersal of individuals to new areas difficult or impossible for the majority of species. Therefore, continuing to just preserve existing fragments of habitats and isolated protected sites alone will not be sufficient to conserve biodiversity: the wider landscape needs to be made permeable to wildlife.

⁹⁷ Natural England (2014) Standing Advice for Ancient Woodland and Veteran Trees

⁹⁸ DEFRA (2011) Biodiversity 2020 – A Strategy for England's Wildlife and Ecosystem Services

- 4.66 The NPPF allows for this new approach to reconnecting nature, by requiring the establishment of ecological network. An ecological network is a connected group of natural and semi-natural habitats which are large enough and sufficiently joined-up to enable the survival of viable populations of flora and fauna species. Ecological networks are managed with the objective of conserving and enhancing biodiversity and maintaining and restoring ecological function in the natural environment.
- 4.67 The Somerset (including Exmoor National Park) ecological network⁹⁹ is a plan of existing and potential strategically important ecological assets which identifies existing and new opportunities for biodiversity, and the linkages required to ensure connectivity between these elements. It is the basic framework that will aid the establishment of a resilient and coherent network, and deliver socially and economically important ecosystem services. The ecological network does not aim to identify all resources of importance to the conservation of the natural environment, and therefore the protection of designated sites and priority habitats remains important.
- 4.68 The ecological network comprises core areas, stepping stones, the matrix and sustainable use areas.
- a) Core areas are patches of priority habitat that are at least as big as the minimum area a species population needs in order to survive.
 - b) Stepping stones are areas of priority habitat that are smaller than the minimum viable area but provide important intermediary areas of habitat, which may help to connect up core areas across the landscape.
 - c) The matrix is a flexible buffer that represents where species are able to move to in the landscape, and this area can contract or be extended according to how hospitable, or permeable, a surrounding land use is.
 - d) Sustainable use areas comprise the majority of the landscape, and this is where real advances can be made in improving the permeability of the land around core areas and stepping stones.
- 4.69 The ecological network will be used to identify development siting constraints, to provide advice on pre-application enquiries and to identify where a net gain for biodiversity can be generated through habitat management, restoration and expansion to enhance connectivity and resilience. Suitable planning conditions and obligations may be used to promote such management and enhancement¹⁰⁰.
- 4.70 Sustainable development in the National Park should strengthen the resilience of the ecological network by avoiding direct and indirect impacts through sensitive site location and design. Sustainable development will not lead to the loss, damage, deterioration or disturbance of Core Areas, or Stepping Stones, and will generate a net gain for biodiversity by enhancing Restoration Areas and matrix habitats.

⁹⁹ Somerset County Council et al (2015) Somerset's Ecological Networks: Mapping components of the ecological network in Somerset

¹⁰⁰ ODPM (2005) Government Circular 06/2005 Biodiversity and Geological Conservation - Statutory Obligations and Their Impact within the Planning System. *The Stationery Office Limited. London*

GREEN INFRASTRUCTURE

- 4.71 National policy encourages Local Plan policies to set out a strategic approach for the creation of green infrastructure networks that contribute towards the conservation and enhancement of the natural environment and the wider aims and benefits of green infrastructure relating to landscape, biodiversity, design, open space, recreation, health and well-being, and climate change mitigation and adaptation¹⁰¹.
- 4.72 National Parks are recognised as providing some of the best quality green infrastructure that helps create a healthy environment for people, communities and businesses, and improving air and water quality.
- 4.73 Green infrastructure networks encompass a wide range of high quality natural, semi-natural, and amenity green spaces and other environmental features. Green infrastructure is planned, or already exists as a multifunctional resource that can deliver a range of benefits that helps underpin sustainable communities. Although green infrastructure is predominantly planned and designed in an urban context, it also has a role in rural areas where land may provide a range of functions and ecosystem services such as: linkages between habitats, biodiversity benefits, carbon storage, flood protection, water purification, and areas for recreation and enjoyment¹⁰². National Parks provide the highest quality green infrastructure on a broad landscape scale that includes extensive habitats, major landscape features, and public access land/rights of way¹⁰³.
- 4.74 Blue infrastructure refers to the water environment which is significant in terms of the important role it has for biodiversity, recreation, flood mitigation and climate change adaptation. Blue infrastructure is usually incorporated within the terminology 'green infrastructure' but can be specifically identified as a tool to improve climate change resilience¹⁰⁴.
- 4.75 Green infrastructure encompasses a variety of spatial scales from provision of open space within communities to large landscape-scale programmes and the links between them. The aims and objectives of the Partnership Plan are central to landscape scale planning in terms of effective land management that also secures green infrastructure benefits through associated projects, plans and strategies.
- 4.76 Part of the western area of the National Park falls within the North Devon Biosphere Reserve Transition Zone which is formed by the catchment area of the Taw and Torridge rivers and other streams which drain to the North Devon coast. The core area is the Braunton Burrows sand dune system. Biosphere Reserves are designated by UNESCO and are part of an intergovernmental programme to improve relationships between people and their environment¹⁰⁵. This approach complements the vision and objectives of the Local Plan (and Partnership Plan) including the promotion of ecosystem services and delivery of green infrastructure networks.
- 4.77 Policy CE-S3 encourages the delivery of green infrastructure, with the support of partner organisations and people that live and work on Exmoor, to provide an effective basis for the enhancement of existing multifunctional green infrastructure networks and

¹⁰¹ DCLG (2012) National Planning Policy Framework (Paragraph 99). Department for Communities and Local Government

¹⁰² HM Government (2011) Natural Environment White Paper – The Natural Choice: securing the value of nature. *The Stationery Office Limited. London*

¹⁰³ Natural England (2009) Green Infrastructure Guidance (NE176)

¹⁰⁴ Green and Blue Space Adaptation for Urban Areas and Eco Towns (GRaBS) project website - www.grabs-eu.org. The GRaBS project is a network of leading pan-European organisations involved in integrating climate change adaptation into regional planning and development.

¹⁰⁵ North Devon Biosphere Team (2015) North Devon Biosphere

to enable the creation of physical and functional network linkages throughout the National Park and cross-boundary links with the surrounding area. Green infrastructure can help deliver ecosystem services as part of the wider public benefits that Exmoor provides to society and enhance the resilience of the ecological network.

- 4.78 It is important that green infrastructure is planned around existing assets. Development proposals should make specific provision for green infrastructure including for wildlife that may also help to support biodiversity adaptation to climate change (CE-D2 Green Infrastructure Provision). Similarly, schemes should reflect and enhance the landscape character types across the National Park (CE-S1) and recognise the broad priorities for each landscape type and the priority areas for action set out in the Exmoor Landscape Action Plan. This will help to ensure that green infrastructure will reinforce the sense of place whilst also contributing to the delivery of sustainable land management e.g. through Higher Level Stewardship (HLS) schemes.
- 4.79 The multi-functional role of green infrastructure can strengthen climate change mitigation and adaptation measures (CC-S1 Climate Change Mitigation and Adaptation). In terms of helping to reduce flood risk, strategic land management programmes can have a significant impact on making space for water, reducing peak flows and helping to lessen the impact of potential flood risk and conserving water (CC-D1 Flood Risk and CC-D2 Water Conservation). Sustainable Drainage Systems (SuDS), which deal with surface water, are designed to mimic natural drainage as closely as possible in a built environment context (CE-S6 and CC-D1 Flood Risk). They provide an example of green infrastructure and an illustration of opportunities to achieve multiple benefits from the management of land together with opportunities to provide public open space (HC-S6 Local Commercial Services & Community Facilities). Green infrastructure, including open space, can act as the ‘green lungs’ of a settlement and will generally contribute to improving air quality and reducing noise pollution.
- 4.80 Climate change mitigation can be achieved by carbon storage including woodland planting and mire restoration as well as reducing the need to travel by private transport (AC-S1 Sustainable Transport) through provision of access routes for sustainable modes of travel – this may be achieved by means of creating linkages between existing public rights of way or specific routes to enable access to local services and facilities.
- 4.81 Green infrastructure can also create a range of social and economic benefits for those who live and visit Exmoor. It is recognised that nature has a positive impact that on mental and physical health and help children’s learning. High-quality natural environments have been shown to foster healthy communities and green spaces encourage social activity¹⁰⁶. Green infrastructure can therefore be incorporated to enhance the health and well-being of local communities and those visiting Exmoor by improving opportunities for recreational activities. Existing assets such as the extensive access network (RT-D12 Access Land and Rights of Way) can also be enhanced to promote the quiet enjoyment of the National Park, including opportunities to enhance and expand the cross-boundary green infrastructure network, such as linking to the MacMillan Way West, Tarka Trail, Two Moors Way and the South West Coast Path. It can also have positive benefits for the economy both directly, through employment in capital projects and future management, and indirectly, through sustaining a high quality environment to attract visitors to Exmoor.

¹⁰⁶ HM Government (2011) Natural Environment White Paper – The Natural Choice: securing the value of nature. *The Stationery Office Limited, London.*

CE-S3 BIODIVERSITY AND GREEN INFRASTRUCTURE

- 1. The conservation and enhancement of wildlife, habitats and sites of geological interest within the National Park will be given great weight.**
- 2. Development delivery, management agreements and positive initiatives will conserve, restore and re-create priority habitats and conserve and increase priority species identified for Exmoor in the Exmoor Wildlife Research and Monitoring Framework (or successor publication).**
- 3. Sites designated for their international, national or local importance, protected species, ancient woodland or veteran trees will be protected from development likely to have direct or indirect adverse effects on their conservation objectives, including notified features and ecological functioning of cited habitats and species.**
- 4. Regionally important geological sites (RIGS) will be safeguarded for their geological and geomorphological interest.**
- 5. Where, in exceptional circumstances, the wider sustainability benefits of the development are considered to outweigh the harm to habitats, species or the geological interest of sites, then measures will be required to first avoid such impacts, and if they cannot be avoided, then to mitigate damage and provide appropriate compensatory measures.**
- 6. The enhancement of biodiversity and creation of multi-functional green infrastructure networks at a variety of spatial scales, including cross-boundary connectivity to areas adjacent to the National Park, that help support ecosystem services will be encouraged.**
- 7. Opportunities will be promoted for habitat management, restoration, expansion that strengthens the resilience of the ecological network, and enables habitats and species adapt to climate change or to mitigate the effects of climate change.**
- 8. Green infrastructure that incorporates measures to enhance biodiversity, including matrix areas identified within the ecological network, should be provided as an integral part of new development.**

GREEN INFRASTRUCTURE PROVISION

- 4.82 Policy CE-D2 Green Infrastructure Provision encourages the provision of green infrastructure as an essential component of new development¹⁰⁷ that also incorporates benefits for biodiversity on a scale that is commensurate with the nature, scale and activity of any development proposal.
- 4.83 Green infrastructure and biodiversity provision can meet similar objectives and may already be incorporated in some development proposals – for example where planting, screening or hedgerows are provided as part of a landscaping scheme. Where this may not apply, suitable measures can be incorporated to provide enhancements to biodiversity (CE-S3) and green infrastructure networks within the National Park and could include:

¹⁰⁷ Natural England (2009): Green Infrastructure Guidance (NE176)

- a) Places for outdoor relaxation and play: e.g. public open space, recreation grounds, and play areas (HC-S6).
 - b) Space and habitat for wildlife with access to nature for people: e.g. landscaping/planting schemes, small-scale habitat provisions to encourage wildlife (CE-S1, CE-S3, CE-S6).
 - c) Climate change mitigation and adaptation: e.g. tree planting, green roofs, provision of ponds/swales/wetland through sustainable drainage systems (CC-S1, CC-D1).
 - d) Environmental education (RT-S1).
 - e) Local food production: e.g. in allotments, orchards and gardens (HC-S6).
 - f) Improved health and well-being – lowering stress levels and creating recreational opportunities for exercise/sport: e.g. expanding the cross-boundary green infrastructure network through the creation of public rights of way linkages (encouraging sustainable modes of travel such as walking, cycling and horse-riding), wild play areas, , and green open space (HC-S6, RT-S1, AC-S1, RT-D12)
- 4.84 This policy aims to deliver green infrastructure enhancements, such as habitat provision for wildlife, within the National Park. Advice is available from officers at the National Park Authority to help applicants provide the most suitable enhancement in relation to the scale and type of development and the surrounding habitat. Incorporating elements of green infrastructure within developments will contribute towards wider outcomes and benefits for the green infrastructure and ecological networks across the National Park.
- 4.85 The design of new development can readily incorporate biodiversity measures and green infrastructure principles in a way that reflects local character, including the creation or enhancement of green space that can contribute to the setting of buildings and settlements. New development such as housing can also these enhancements by incorporating gardens, community orchards, wild play areas, ponds, native planting of green roofs, landscaping (CE-S6, CE-S1) and allotments.
- 4.86 Even relatively small development proposals can directly add value to biodiversity and green infrastructure through inexpensive but effective measures including:
- a) nesting sites for birds (e.g. boxes for owls, swallows, house martins etc.)
 - b) roosting areas for bats
 - c) establishing of small areas of habitat and/or native planting.

CE-D2 GREEN INFRASTRUCTURE PROVISION

- 1. Development proposals should include measures that will enhance green infrastructure provision and create opportunities for wildlife in the National Park commensurate with the scale of the proposal and intensity of activity expected.**
- 2. Green infrastructure proposals should:**
 - a) protect and enhance existing natural and historic environments;**
 - b) strengthen connectivity and resilience of ecological networks;**
 - c) be locally distinctive through reflecting and enhancing landscape character;**
 - d) maximise opportunities to mitigate and adapt to climate change; or**
 - e) improve quality of life through provision of benefits for health and well-being, including opportunities to access open space and enjoyment of the National Park and its special qualities.**
- 3. Proposals will be encouraged where a range of green infrastructure benefits can be achieved.**

CULTURAL HERITAGE AND HISTORIC ENVIRONMENT

Objective 5: *To ensure that the built tradition, character, distinctiveness and historic character of Exmoor's settlements, buildings, farmsteads, landscapes, archaeological sites and monuments are conserved and enhanced and that the cultural heritage of Exmoor is protected through the careful management of development.*

Objective 6: *To encourage new development to use local materials, sustainable building design and methods, in ways that contribute to the distinctive character and cultural heritage of Exmoor.*

Objective 10: *To support, record and understand aspects of culture and traditions that are special to Exmoor.*

CONTEXT

- 4.87 The Government's vision¹⁰⁸ and policies¹⁰⁹ for the historic environment recognise the central role it plays in cultural heritage and the multiple ways its supports and contributes to the economy, society and daily life, and also that it is a non-renewable, resource. Government places a priority on the conservation of heritage assets in a manner appropriate to their significance, and their value to current and future generations.
- 4.88 The historic environment is a rich and diverse part of Exmoor's cultural heritage. It results from the interaction between people and places through time, and creates local distinctiveness and a sense of place. This historic environment provides the evidence for past ways of life, technologies and the exploitation of the natural resources of Exmoor. Exmoor's historic landscape includes thousands of individual sites and structures, and the preservation of sites on Exmoor is generally excellent. The survival of such a remarkable record of landscape change is very rare in England.
- 4.89 The quality of the cultural heritage and historic environment are part of what attracts people to visit Exmoor, and is therefore an important part of the local economy. However, these resources are also fragile, vulnerable to insensitive change and, ultimately irreplaceable. The protection and enhancement of Exmoor's cultural heritage and historic environment is consequently a high priority. The historic character of buildings and settlements is easily eroded by small incremental changes over time, as well as by new development and insensitive modernisation for example, unsightly overhead wires, removal of traditional fabric such as cobbling, or increasing the clutter of signs and street furniture. Similarly, the quality and character of Exmoor's historic buildings can easily be destroyed by unsympathetic or inappropriate renovation, repair, extension, redevelopment, or simply by neglect. The National Park Authority is able to influence the effect of alterations to historic buildings, the design of new buildings and other works through the planning policies set out in this Plan and places a high priority on protecting and enhancing Exmoor's cultural heritage and historic environment.

EXMOOR'S HERITAGE ASSETS

- 4.90 Heritage assets are the significant buildings, monuments, sites, places, areas or landscapes within the historic environment which are identified because of their heritage interest. They contribute to our society, knowledge and culture and therefore merit consideration in planning decisions. The significance of a heritage asset is based

¹⁰⁸ The Government's vision for National Parks is that they are "thriving, living, working landscapes notable for their natural beauty and cultural heritage... and everyone can discover the rich variety of England's natural and historic environment, and have the chance to value them as places for escape, adventure, enjoyment, inspiration and reflection, and a source of national pride and identity"

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

¹⁰⁹ DCLG (2012) National Planning Policy Framework. (Section 12). Department of Communities and Local Government

on its value to current and future generations, and is the sum of its architectural, historic, artistic or archaeological interest and its setting. Some heritage assets have a level of significance that justifies special protection measures through designation and legislation, but locally valued (non-designated) assets also have historic interest and play a key role in defining place and in building local pride.

DESIGNATED HERITAGE ASSETS

4.91 Within Exmoor, the designated heritage assets include:

- a) 16 Conservation Areas are designated under the Planning Act 1990 for their special historic or architectural interest, the character and appearance of which it is desirable to preserve or enhance. Conservation Areas have been designated for: Allerford, Bossington and West Lynch, Colton Farm, Dulverton, Dunster, Leigh Barton Farm, Lower East Lyn Farm, Luccombe, Lynmouth, Lynton, Parracombe, Porlock, Porlock Weir, Ranscombe Farm, Selworthy, and Wootton Courtenay. The Conservation Areas all have Character Appraisals, which record the key features that contribute to their character and assess their condition. The potential for further Conservation Areas will be kept under review.
- b) 741 Listed Buildings are designated under the Planning Act 1990, which hold special historic or architectural interest. Buildings are graded according to the level of interest as Grade I (exceptional), Grade II* (particularly important), or Grade II (special interest). Exmoor has 20 Grade I, 53 Grade II* and 668 Grade II. Any proposals relating to Listed Buildings or their settings may require listed building consent and/or planning permission. As the Authority has a statutory duty to protect Listed Buildings, the presumption will be to preserve them, and demolition or loss of Listed Buildings will only be permitted in exceptional circumstances, where prior recording will be a requirement.
- c) 201 Scheduled Monuments (SMs) are designated under the Ancient Monuments and Archaeological Areas Act 1979 as nationally important by reason of their historic, architectural, artistic, traditional or archaeological interest. Sites of archaeological significance on Exmoor should be preserved wherever possible. However, although all surviving archaeological remains are irreplaceable, they are not all of equal importance. Preservation should be based on levels of significance, and priority should be given to those sites considered to be of national importance, especially as many of these are not protected by designation as Scheduled Monuments. The desirability of preserving an ancient monument and its setting is a material consideration whether it is scheduled or not. Development proposals adversely affecting the integrity or setting of designated sites or other sites/ remains considered to be of national importance will not be permitted unless it can be clearly demonstrated that it is necessary to achieve substantial public benefits that outweigh the harm or loss (see 4.98 – 4.100 in relation to measures required for recording and advancing the understanding of heritage assets)¹¹⁰.
- d) 2 Historic Parks and Gardens that are registered by English Heritage under the Historic Buildings and Ancient Monuments Act 1953 for their special historic interest are Nettlecombe Court (Grade II) and Dunster Castle (Grade II*). Historic Parks and Gardens are significant heritage assets and, whilst there are no statutory controls over these sites, Government policy is that they should be protected and enhanced under the planning system. Any development proposals

¹¹⁰ DCLG (2012) National Planning Policy Framework (paragraph 132-141). Department of Communities and Local Government.

which would harm the special features and qualities of Historic Parks or Gardens or their settings will not therefore be permitted.

- e) In addition, Exmoor has non-designated heritage assets with archaeological interest that are of equivalent significance to Scheduled Monuments. These aspects of Exmoor's historic environment are of such complexity or rarity that they are of regional or national significance, including the extensive survival of prehistoric archaeology (especially on the moorlands); the widespread evidence of agricultural reclamation, and the evidence for early industrial exploitation such as iron mining and smelting. These are included on the Exmoor National Park Historic Environment Record (HER) and will be considered in the same way as designated assets, as set out in Policy CE-S4.

4.92 The Policies Map shows the location of Scheduled Monuments, Conservation Areas, Listed Buildings and Historic Parks and Gardens within the National Park.

NON-DESIGNATED HERITAGE ASSETS

4.93 Exmoor has a wealth of non-designated heritage assets including historic buildings, settlements, sites and structures that form an important part of the local character and distinctiveness of the area and are an important record of Exmoor's past. This includes diverse examples such as the remains of prehistoric settlements, barrows, standing stones, industrial sites and landscapes, the evidence of nineteenth century agricultural improvements and many historic buildings. Whilst archaeological sites and monuments form the most visible aspect of Exmoor's archaeological remains, buried sites and soil deposits, which are usually not visible, also contain information about the past.

4.94 In considering applications likely to affect locally important assets, the National Park Authority will assess their significance and the desirability of their preservation. Applicants will be required to provide adequate information to enable the National Park Authority to assess the significance of a site or feature. Adverse impacts on heritage assets of local importance should be avoided and development will only be permitted where the archaeological/historic interest is capable of being preserved in situ. Where, in exceptional circumstances, an application is approved which will result in the loss (wholly or in part) of heritage assets, then developers must record and make publically available this information to advance understanding of the significance of the assets. However the ability to record evidence of the assets will not be a factor in deciding whether loss of the asset should be permitted.

4.95 There may be other occasions where a threat to archaeological remains occurs from an activity which is permitted development¹¹¹. In such cases consideration will be given to whether the archaeological interest can be protected through the withdrawal of permitted development rights under Article 4 of the General Permitted Development Order which will then require an application for planning permission to be made.

4.96 Principal Archaeological Landscapes (PALs) have been identified¹¹² on the Historic Environment Record (see below) as areas that best represent the diversity of the archaeology of Exmoor and define landscapes rather than individual features. The archaeology of the moorland in particular is exceptionally well preserved, making the resource as a whole of national significance; the relict prehistoric landscapes are possibly internationally significant. They form a rare and very extensive survival of entire past landscapes across the domestic, social, economic and spiritual spheres.

4.97 In addition to the national and statutory designations, local planning authorities may formally identify heritage assets that are important to the area, for example through

¹¹¹ HM Government (2015) Town and Country Planning (General Permitted Development) (England) Order 2015. *The Stationery Office, London.*

¹¹² Fyfe and Adams (2008) Assessment of the Areas of Exceptional Archaeological and Historical Importance. *Exmoor National Park Authority, Dulverton*

local listing as part of the plan-making process. A set of criteria for developing a local list for Exmoor has been developed by Exmoor National Park Authority, and will be applied to assets identified through the Exmoor National Park Historic Environment Record (HER) and in consultation with local communities. This will form an important material consideration in determining planning applications.

HISTORIC ENVIRONMENT RECORD

- 4.98 Heritage assets on Exmoor are recorded by the National Park Authority on the HER. This includes all known historic sites and features from the earliest human activity to the present day. All aspects of the archaeological and built environment are recorded and these records are updated as sites are identified. These include earthworks, ruins, finds, historic buildings, historic landscapes, industrial archaeology, military sites and boundaries. It records the existence of sites and indicates the research which has been undertaken for these assets. The HER also records locally important designed landscapes and historic gardens. New heritage assets are being identified all the time, and are added to the HER. The HER can be accessed online¹¹³, or by contacting the National Park Authority's officers. In considering development proposals, specialist advice may be sought from National Park Authority conservation officers on the significance of the heritage asset and how it contributes to the conservation and enhancement of the area's cultural heritage.

CONSIDERING PROPOSALS AFFECTING HERITAGE ASSETS

- 4.99 Where heritage assets are likely to be affected by development proposals, these should be identified at pre-application stage. Applications should describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the asset's importance, in order to understand the potential impact of the proposal on their significance. The Exmoor Historic Environment Record should be consulted as a minimum to determine whether or not a heritage asset is likely to be affected and its significance; however the National Park Authority should be contacted if data is required in support of a planning application. In some circumstances, a Heritage Assessment may be required. The National Park Authority can provide further guidance and early discussion with officers is also encouraged.
- 4.100 Where an application affects or has the potential to affect heritage assets with archaeological interest (including Scheduled Monuments, within historic settlement cores¹¹⁴, within the curtilage of a listed building, PALs, historic field patterns or historic farmsteads¹¹⁵, or other locally designated assets on the HER), applications must include an appropriate desk-based assessment and, where necessary, a field evaluation which may need to include full excavation, examination and recording and public involvement where appropriate. Applicants are encouraged to discuss their plans at an early stage with the National Park Authority who will advise whether proposals are likely to affect archaeological sites or features and their settings, and whether further work is necessary. If archaeological remains are encountered during development, the National Park Authority will offer advice and assistance on their importance and the appropriate course of action. Archaeological assessments and field evaluations should be in accordance with the Annex 1: Conduct of Archaeological Work and Historic Building Recording within Exmoor National Park (Section 11).

¹¹³ Further information on the Exmoor National Park Historic Environment Record can be found at: www.exmoorher.co.uk

¹¹⁴ Historic settlement cores are shown on the settlement inset maps – these areas are defined using the late 19th century 1st Edition Ordnance Survey Maps (1:2500 scale) and tithe maps (1838-1840)

¹¹⁵ Architecton (1997) Exmoor Farmsteads: An Evaluation of Old Steadings within Exmoor National Park. *Exmoor National Park Authority, Dulverton.*

The survey gave the Historic Farmsteads a status of grade 1, 2/1, 2/2, 3 and 4. Only those graded 1 and 2/1 as 'outstanding', and therefore of greatest historical interest, are shown on the Policies Map.

- 4.101 To be consistent with the conservation and enhancement of the cultural heritage of the National Park, proposals which may affect Exmoor's settlements, whether or not they are currently designated as Conservation Areas, should seek to preserve or enhance their historic/architectural interest, character and appearance.

CE-S4 CULTURAL HERITAGE AND HISTORIC ENVIRONMENT

- 1. Exmoor National Park's local distinctiveness, cultural heritage, and historic environment, will be conserved and enhanced to ensure that present and future generations can increase their knowledge, awareness and enjoyment of these special qualities.**
- 2. Heritage assets (identified on the Exmoor National Park Historic Environment Record) and their settings, will be considered in a manner appropriate to their significance including:**
 - a) designated conservation areas, scheduled monuments, listed buildings, and registered historic parks and gardens;**
 - b) non-designated heritage assets that are of equivalent significance to scheduled monuments, including those that may be discovered in the future;**
 - c) locally important historic sites and features; and**
 - d) Principal Archaeological Landscapes.**
- 3. Development proposals should make a positive contribution to the local distinctiveness of the historic environment and ensure that the character, special interest, integrity, and significance of any affected heritage asset and its setting is conserved and enhanced.**
- 4. Development proposals likely to affect heritage assets should be supported by a desk-based assessment and in appropriate cases, developers will be required to arrange for archaeological field evaluations – these should be prepared in accordance with the Conduct of Archaeological Work and Historic Building Recording within Exmoor National Park (Annex 1).**
- 5. Where development proposals are likely to cause significant harm to or loss of designated heritage assets or assets of national significance, permission will be refused.**
- 6. Adverse impacts on locally important heritage assets should be avoided. Where proposals are likely to cause harm or loss to locally important assets, permission will only be granted in exceptional circumstances where the public benefit outweighs the asset's historic or archaeological interest. The features of interest should be preserved in situ, but where this is not justifiable or feasible, provision must be made for appropriate preservation by record.**
- 7. Development proposals should positively reinforce the historic character of Exmoor's settlements through reflecting the traditional vernacular architecture and enhancing local distinctiveness.**

CONSERVING HERITAGE ASSETS

CONSERVATION AREAS

- 4.102 Conservation Areas are designated in recognition of their unique character and local distinctiveness, which is derived from the combination of historical and architectural features including: groupings of buildings, their form and prominence, different styles, the relationship between buildings and spaces, views along streets and between buildings, traditional street patterns and layouts and the design and traditional materials of buildings. Features within the Conservation Area such as bridges, trees, hedgerows, boundary walls, banks, rivers, open spaces and footpaths are all important in giving an area its character. Porlock Weir and Lynmouth Conservation Areas include historic harbours.
- 4.103 As Conservation Areas generally cover a more extensive area compared to other heritage assets, development will be carefully managed to ensure that their character is preserved or enhanced. Particular attention will be given to the special features for which the area is designated, in order to ensure that the impact of proposals on the valued elements of Conservation Areas can be properly assessed. This might include the impact on the skyline, views in and out of the Conservation Area, the loss of or works to trees or the loss of definition of a settlement boundary.
- 4.104 Given their level of significance, there will normally be a presumption against the demolition or loss of a building or feature contributing to the character of the Conservation Area. An emphasis will also be placed upon the use of local, traditional, materials and traditional methods of construction and design that respond to the local vernacular architecture. Article 4 Directions in Conservation Areas are a means of controlling alterations to features including roofs, doors, windows and chimneys and will be used where appropriate.

PRINCIPAL ARCHAEOLOGICAL LANDSCAPES (PALs)

- 4.105 PALs are relatively extensive areas which encompass a range of designated and non-designated heritage assets which relate to each other to form a common archaeological landscape shaped by specific human achievements. The first PALs were identified on Exmoor's moorland and demonstrate an extremely high quality of preservation. They include examples of: relict prehistoric landscapes, medieval farming systems, parliamentary enclosure and the reclamation of the Royal Forest, and military training landscapes¹¹⁶. Subsequent PALs have been identified in other areas of the National Park including landscapes associated with Exmoor's industrial heritage (e.g. the West Somerset Mineral Line).
- 4.106 The main threats to PALs generally lie outside the scope of planning and include management issues such as farming, vandalism, visitor pressure and vegetation. Although the initial tranche of PALs were mainly located on open moorland areas that are usually protected for their international and national wildlife significance, subsequent PALs are more widespread and include areas of settlement including farmsteads and villages. Applications for development within or likely to affect a PAL should therefore avoid harm to the integrity and archaeological interest of the PALs and specifically relate to the significant and context of the site. It is considered that many of the open moorland PALs will be inappropriate for development.

¹¹⁶ Wilson-North R. and Riley H. (2004) Exmoor Moorlands – The Historic Environment, *Exmoor National Park Authority, Dulverton*

HERITAGE ASSETS AND THEIR SETTINGS

- 4.107 The NPPF¹¹⁷ explains that the setting of a heritage asset is the surroundings in which a heritage asset is experienced. Its importance is determined by how it contributes to the significance of the heritage asset. The extent of a setting is not fixed and may change as the asset and its surroundings evolve over time and therefore cannot be definitively and permanently described. Elements (individual features) of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.
- 4.108 Extensive heritage assets, such as PALs and Conservation Areas, can include many heritage assets and their nested and overlapping settings, as well as having a setting of their own. The setting of a heritage asset may reflect the character of the wider settlement or landscape in which it is situated, or be quite distinct from it. The setting in built up areas, given the potential numbers and proximity of heritage assets, is therefore intimately linked to considerations of design and of the character and appearance of conservation areas.
- 4.109 Setting is most often associated with views looking towards, across or from within the asset. Views that contribute more to the significance of the asset include those with historical associations such as view-points; where there are relevant associations between the asset and other heritage assets, natural features or phenomena (lunar/solar events); and where the view is a fundamental aspect of the design or location. Conservation character appraisals will also identify important views¹¹⁸.
- 4.110 Development proposals should seek to avoid adverse cumulative impacts on the setting of the heritage assets, and the erosion of its aesthetics. The National Park Authority will encourage the enhancement of heritage assets and their setting, including the repair or restoration of important features, the improvement or removal of unsightly features, and measures that better reveal the significance of the asset.

CLIMATE CHANGE

- 4.111 Many of Exmoor's heritage assets are vulnerable to climate change, for example flood events leading to the direct destruction of historic structures such as bridges, mills and other waterside buildings. Sea level rise is likely to directly impact on sites and structures and archaeological deposits in the inter-tidal and coastal environment, including Scheduled Monuments and Listed Buildings, archaeological and palaeo-environmental deposits; industrial structures (such as limekilns, fish weirs); military structures and sites; and features from Exmoor's 18th and 19th century estates. Where such sites are likely to be lost to sea-level rise, the National Park Authority will seek to ensure that they are preserved through record.
- 4.112 Responses to climate change may require adaptations to historic buildings and the archaeological deposits around and beneath them. Whilst these changes may be required to ensure the continued preservation of the building or site, it is important to ensure that they do not cause inappropriate or damaging alterations. In the same way, measures to mitigate climate change, including the application of renewable energy technologies to historic buildings or within Conservation Areas, or the re-use of historic water mills for small scale power generation, should take account of whether energy efficiencies have been made, (where appropriate) and should not harm the special interest or appearance of the heritage asset.

¹¹⁷ DCLG (2012) National Planning Policy Framework (glossary). Department of Communities and Local Government

¹¹⁸ English Heritage (2014) Historic Environment Good Practice Advice Note 3: The Setting of Heritage Assets (consultation draft)

REDUNDANT HERITAGE ASSETS AND ASSETS AT RISK

- 4.113 Whilst the protection of Listed Buildings is paramount, the National Park Authority recognises that historic buildings have been altered and extended over time and that the need for change will continue and may sometimes be necessary to ensure its use is maintained. This may include adaptation or re-use to take account of climate change or bringing the building back into viable use. Any proposals for alteration, repairs, extension (including internal works or works within the curtilage) or change of use must be compatible with the listed building's historical or architectural interest. The character of a listed building is linked to its setting, and development proposals which adversely affect settings will not be permitted. The maintenance and use of heritage assets should make a positive contribution to local character and distinctiveness¹¹⁹.

CE-D3 CONSERVING HERITAGE ASSETS

1. Conservation Areas

Development proposals affecting Conservation Areas should ensure that:

- a) the character and appearance of the area are preserved or enhanced;**
- b) they deliver high quality design and incorporate materials that reflect the scale, architectural quality and detailing of the area.**

2. Principal Archaeological Landscapes

Development proposals affecting Principal Archaeological Landscapes (PALs) should be well related to existing development and of a scale and form that will not cause unacceptable adverse effects on the significance, integrity or context of the PAL as a whole or its individual components.

3. Heritage Assets and their Settings

Development proposals affecting a heritage asset and its setting should demonstrate:

- a) a positive contribution to the setting through sensitive design and siting;**
- b) the promotion of the understanding and enjoyment of the heritage asset and its setting or better reveal its significance and appreciation of the setting;**
and
- c) avoidance of unacceptable adverse and cumulative visual effects that would impact on the setting.**

4. Heritage Assets and Climate Change

Development proposals affecting heritage assets that are required to adapt to, or mitigate the effects of, climate change will be permitted where it can be demonstrated that:

- a) measures to adapt to climate change will safeguard the heritage asset over the longer term, and conserve their special interest; or**
- b) measures to mitigate the effects of climate change will not harm the special interest or appearance of the heritage asset.**

5. Redundant Heritage Assets and Assets at Risk

- a) development proposals that seek to bring heritage assets, that are redundant or at risk, into a viable use in ways that are consistent with their long term conservation will be encouraged; and**
- b) proposals should be consistent with policy CE-S4 Cultural Heritage and Historic Environment and CE-S5 Principles for the Conversion or Structural Alteration of Existing Buildings to ensure they continue to positively enhance local character and distinctiveness.**

¹¹⁹ English Heritage (2014) Historic Environment Good Practice Advice Note 1: The Historic Environment in Local Plans (consultation draft)

THE CONVERSION OR STRUCTURAL ALTERATION OF BUILDINGS

CONTEXT

- 4.114 Policy CE-S5 sets out the principles that should be applied to the conversion or structural alteration of existing traditional and non-traditional buildings, to enable a change of use that is consistent with other policies in this plan.
- 4.115 National policy encourages the reuse of existing buildings to support the transition to a low carbon future¹²⁰ as it generally provides environmental savings compared to demolition and new construction¹²¹. During the lifecycle of buildings, their construction use and demolition, a vast amount of energy is consumed. The efficient use of resources is an important principle of sustainable construction; re-using existing buildings or building materials, for example, reduces the need to manufacture and/or win new materials for construction and therefore reduces the proportion of embodied energy¹²² required and carbon emissions. Existing buildings are therefore a significant resource and enabling adaptive reuse through conversion can help to achieve sustainable development objectives and provide long term benefits for the individual building. The National Park Authority will take account of the permitted development rights that exist for the change of use of agricultural buildings under the General Permitted Development Order 2015 (as amended).

THE CONVERSION OF TRADITIONAL BUILDINGS

- 4.116 Traditional buildings are important assets that contribute to the cultural heritage of the Park and include a range of building types. The term 'traditional buildings' refers to mostly older buildings of solid wall construction built of natural and often local materials (e.g. stone, cob, brick, lime mortar and render) that on Exmoor usually predate the Second World War¹²³. This term may also include buildings of historic interest, and where the use of certain materials may be long established, for instance some timber buildings and community buildings clad in corrugated iron sheeting. It will be for the National Park Authority to determine whether a building is considered to be 'traditional' based on its historic and/or vernacular merit and its contribution to the National Park.
- 4.117 Many traditional farm buildings on Exmoor are historically significant and contribute to local distinctiveness and landscape character. The National Park Authority encourages the continuation of the original use and sensitive repair of such buildings using traditional materials. Advice can be provided on repair and the availability of grants including through agri-environment schemes¹²⁴.
- 4.118 Where possible, the retention of the original use of traditional buildings is the preferred approach; however this is not always feasible. For example, the fragmentation of farms has resulted in some smaller holdings with a range of traditional buildings no longer required for their intended use, or on larger holdings where their use has been replaced by modern agricultural buildings that can accommodate larger numbers of stock for over-wintering. Dwindling congregations have also resulted in the closure of a number of chapels across the National Park. Other traditional buildings on Exmoor include former industrial buildings such as mills and storage buildings.

¹²⁰ DCLG (2012) National Planning Policy Framework (Paragraph 17). Department of Communities and Local Government

¹²¹ Preservation Green Lab (2011) The Greenest Building: Quantifying the Environmental Value of Building Reuse

¹²² Embodied energy is the total amount of energy consumed during the production, renovation, replacement or demolition of a building.

¹²³ In terms of traditional farm buildings 'traditional' describes farm buildings pre-dating 1940 in the following publication: English Heritage (2006) Conversion of Traditional Farm Buildings: A Guide to Good Practice

¹²⁴ Natural England and English Heritage (2009) Farming for the historic environment – Make the most of Environmental Stewardship

- 4.119 The sympathetic adaptation of these and other buildings in the National Park can ensure that the long term maintenance of the building fabric, and its embodied energy can be sustained. Proposals should seek to ensure that the capacity and structure of the building is practical for the proposed use. Original features that provide evidence of their former use should be retained and minimal changes made to the building fabric to ensure the historic and architectural integrity of the building and its setting in the landscape are conserved. A condition may also be attached to a planning permission to ensure that the buildings and features of interest are recorded prior to the commencement of development. The level of recording required will be based upon the historic significance of the building and the intended use (CE-S4 Cultural Heritage and Historic Environment).
- 4.120 In many cases proposals for the conversion or structural alteration of a traditional building are likely to require a structural survey and an ecological survey as part of a planning application. However, some traditional buildings may be considered too sensitive to convert to any alternative use due to reasons of their landscape setting, wildlife value, or heritage (see policies CE-S1, CE-S3 & CE-S4)¹²⁵.
- 4.121 Where a traditional building is regarded as structurally unsatisfactory for conversion, i.e. if substantial reconstruction, extension or alteration is proposed or where the building is derelict, has no roof or is structurally unsound; the proposal will be classified as a 'new build' rather than 'conversion' and will need to accord with the relevant policies set out in this Local Plan. Such proposals should still seek to retain the embodied energy in the building and the historic fabric of the structure. It may be preferable for some ruined buildings to remain with measures in place to stabilise their structure where they are of landscape or historic value.
- 4.122 Traditional buildings require sympathetic design ensuring that traditional approaches to materials and detailing are taken to conserve the intrinsic quality, character and appearance of the building. This applies to all traditional buildings in the National Park including those which have a special architectural and historic interest, such as: listed buildings and structures, those within Conservation Areas, Historic Farmsteads, or those identified as a heritage asset on the Historic Environment Record (see policies CE-S4 and CE-D3). Conservation Area Character Appraisals are a useful source of information relating to the architecture and aspects of design that are important within each Conservation Area.
- 4.123 Attention to the detailed design and standard of craftsmanship and materials used can help to ensure a sensitive conversion scheme or alteration to a traditional building, and the following key points should be addressed:
- a) Windows and doors should be constructed of timber, and of an appropriate design and finish that reflects the age, character and former use of the building. Where there are existing windows and doors (including metal windows) they should be repaired and retained rather than replaced – if this is not possible then they should be replicated. Where the Authority considers it to be appropriate, former shutters for openings in barns should be retained as shutters where a glass window is inserted into an existing opening.
 - b) The use of lime-based mortar and render will be required to allow movement of traditional buildings (constructed of stone) and prevent the accumulation of damp whilst providing an attractive and authentic visual quality.

¹²⁵ University of Gloucester *et al.* (2006) Living Buildings in a Living Landscape – finding a future of traditional farm buildings

- c) Where cob is the existing structural material then it will be expected that locally sourced cob will be used in the conversion for the repair of existing walls.
 - d) Roofing materials should be retained where it is a traditional natural material such as clay pantiles, natural slate or wheat-reed thatch – new roofing should use appropriate natural traditional materials. In certain circumstances – such as the conversion of buildings for ancillary uses – the use of corrugated iron or steel sheeting may be acceptable as a roofing material¹²⁶ where no other traditional roofing material is present.
 - e) The creation of new openings should generally be avoided. If rooflights are considered not to harm the appearance or historic character of the building they should be kept to a minimum on the least prominent roof slope, and use a flush ‘conservation’ type rooflight.
 - f) The extent of the curtilage should be minimised and any works sensitively incorporated to avoid adverse impacts on the immediate setting and character of the building and its visual impact on the wider landscape.
- 4.124 Applicants are encouraged to seek advice on proposals for traditional and historic buildings from officers at the National Park Authority. Further detailed guidance can be found in the English Heritage publication *Conversion of Traditional Farm Buildings* (2006) or successor guidance.
- 4.125 To avoid harmful impacts on the historic and architectural interest of traditional buildings, any adaptations (particularly change to residential use) should ensure that the simplicity and design of the building and its setting are retained. This can be achieved by avoiding overly intensive uses and excessive internal partitioning of the building; whilst retaining some spare capacity for ancillary purposes. For example, where there is a whole complex of traditional buildings on a farmstead, an approach which leaves some buildings unconverted to enable space for storage, or continuing agricultural use, would help to ensure the retention of some of the original vernacular form (HC-D4 Conversions in the Open Countryside and RT-D4 Non-serviced Accommodation). This approach avoids the pressure for additional new build development in the future and will be decided on a case by case basis. In terms of forming a residential curtilage around traditional buildings; this should not result in unacceptable adverse impacts on the character of the building or its setting.
- 4.126 Isolated traditional farm buildings, which are not well related to farmsteads, hamlets or named settlements, are particularly sensitive in terms of their setting and are not suitable for adaptive uses requiring access, parking, installation of utility services or provision of a ‘curtilage’, as such additions can detrimentally impact the setting of the building and landscape character of the area. It is often advisable, therefore not to change the use of such buildings. However in some cases, their conversion to simple camping barns often referred to as ‘stone tents’, may offer a potential new use, where a proposal would meet the requirements of policy RT-D6 Camping Barns.
- 4.127 Where permission is granted for the conversion of a traditional building, a condition will be attached to remove permitted development rights granted by the General Permitted Development Order¹²⁷, in respect of alterations and extensions to residential properties as this will help to ensure that the character and appearance of these buildings are conserved.

¹²⁶Corrugated galvanised steel sheeting (also referred to as corrugated iron or tin) has been widely used as a roofing material since the middle of the 19th century and has become part of the farm building vernacular – when using this material it should not have a plastic/polyester coating but either left to weather or painted in a suitable colour agreed with the Authority. Modern box-profile sheeting is considered to be an inappropriate material for the reuse of traditional buildings

¹²⁷ HM Government (2015) *Town and Country Planning (General Permitted Development) (England) Order 2015*. *The Stationery Office, London*.

4.128 Proposals for extensions should, in the first instance, seek to accommodate provision within existing outbuildings before considering new additions. New additions to converted buildings may only be considered where the historic significance of the main building and its setting are not compromised, and where the extension is demonstrably subservient (CE-S6 Design & Sustainable Construction Principles and CE-S4 Cultural Heritage and Historic Environment).

THE CONVERSION OR STRUCTURAL ALTERATION OF NON-TRADITIONAL BUILDINGS

- 4.129 Modern buildings of non-traditional construction are generally built post-war. Where policies in this plan provide for the reuse of such buildings, proposals should demonstrate that there are no traditional buildings available for conversion or where traditional buildings that are present are unsuitable due to reasons of capacity, visual impact, landscape setting, wildlife interests or historic importance.
- 4.130 Although there is a range of post-war buildings in the National Park, this category also includes modern agricultural buildings (SE-S3 Business Development in the Open Countryside). The fabrication and structural limitations of modern agricultural buildings can constrain the range of adaptive uses that may be suitable. However, certain employment or recreation uses can be acceptable where the existing building is of permanent construction and the proposed use will not require any substantial reconstruction. Furthermore, there should be no unacceptable impacts on the National Park, local amenity, or the day to day operation of the farm or land-based business (SE-S3 Business Development in the Open Countryside). Opportunities to provide environmental and visual enhancement including through design, landscaping, and reducing the size of the building will be encouraged.
- 4.131 The reuse of a modern agricultural building should not necessitate the need for another agricultural building, and proposals for the reuse of agricultural buildings for non-agricultural purposes will be required to demonstrate why the building is redundant or no longer needed. Where permission is granted for reuse, conditions may be attached to withdraw permitted development rights for the construction of new farm buildings on the holding to prevent the proliferation of such buildings, which can have a detrimental impact on landscape character.
- 4.132 Buildings that have been constructed for less than 10 years would not normally be considered for conversion and/or change of use. In such circumstances, the degree to which the building has been used for the intended agricultural purpose will be taken account of. Where the National Park Authority has reasonable cause to believe that an applicant has, with the benefit of permitted development rights constructed a new farm building, with the intention of early conversion to another use, it will be appropriate to investigate the history of the building to establish whether it was ever used for the purpose for which it was claimed to have been built (SE-S3 Business Development in the Open Countryside).

CE-S5 PRINCIPLES FOR THE CONVERSION OR STRUCTURAL ALTERATION OF EXISTING BUILDINGS.

- 1. The conversion or structural alteration of any existing building will be permitted where the proposal:**
 - a) accords with the relevant policies in this Plan in terms of the intended use;**
 - b) clearly demonstrates that the building is capable of conversion without substantial reconstruction;**
 - c) is suitable for the existing building in terms of the intended use and the intensity of that use, in relation to its capacity, structure and character without substantial alteration; where the conversion of a building relates to a change of use to a dwelling, sufficient curtilage space should be provided where the delineation of this space would not individually or cumulatively result in harm to the character of the building or its setting; and**
 - d) bat and barn owl roosts are maintained or replaced.**
- 2. In addition to clause 1, proposals for the conversion or structural alteration of traditional buildings, should also:**
 - a) ensure the historic fabric, and architectural interest of the building and its setting including the retention of existing traditional and historic features are conserved and enhanced;**
 - b) reflect the character and significance of the building and conserve its traditional appearance through sensitive design and the use of traditional materials, detailing and construction principles; and**
 - c) conditions will be attached to remove permitted development rights granted by the General Permitted Development Order 1995 to ensure the character and appearance of traditional buildings are conserved.**
- 3. In addition to clause 1, proposals for the conversion or structural alteration of non-traditional buildings, will only be considered if traditional buildings are demonstrated to be incompatible with the intended use or no such buildings are present, and where:**
 - a) the building is of permanent and substantial construction; and**
 - b) measures to provide environmental and visual enhancement to the building and its setting are incorporated.**

DESIGN AND SUSTAINABLE CONSTRUCTION PRINCIPLES

CONTEXT

- 4.133 High quality development, achieved through good, inclusive design¹²⁸ and efficient use of resources, is firmly embedded in national planning policy as a key element of achieving sustainable development to improve the character and quality of a place; contributing to the improvement of places for people with good standards of amenity to create attractive places to live, work and visit. The design of developments should respond to local character, reflect local surroundings and materials, to establish a strong sense of place whilst not discouraging appropriate innovative design.
- 4.134 Good architecture and appropriate landscaping are important elements of the overall design to integrate new development into the natural, built and historic environment, whereas the safety, accessibility and overall inclusiveness of the design is acknowledged as going beyond aesthetic considerations to address connections between people and place.
- 4.135 Policy CE-S6 Design and Sustainable Construction Principles, sets out the principles guiding the design and construction of new development. It promotes high quality sustainable design which conserves and enhances the National Park by ensuring new development reflects and complements Exmoor's landscape and settlement character.
- 4.136 Within the National Park development patterns and forms should respond to Exmoor's traditional buildings. All development should be of high quality, attractive and well-designed so that it works well in the long term by paying attention to detail; giving consideration to layout, orientation, siting, density, scale, materials, landscaping, architectural detailing that conserves and enhances the area.

ACCESSIBILITY & AMENITY

- 4.137 Good design should also address the relationship between people and place and ensure that people can move easily between areas and access employment and other key services. Design principles should also address social and environmental concerns, to ensure that developments are safe and accessible for people who live, work and visit and should, where appropriate, provide benefits for health and well-being such as open space for recreation, footpaths, and cycle ways.
- 4.138 The amenities of occupiers of neighbouring properties including issues such as overlooking, loss of daylight/sunlight or overbearing appearance should be taken into account when submitting development proposals to ensure the amenities of neighbouring occupiers (and future occupants) are protected in the public interest. In terms of 'overlooking', proposals which seek to avoid this issue using fixed-shut, obscure glazing, should demonstrate that there is no unacceptable perception of overlooking.

FORM, CHARACTER AND LAYOUT

- 4.139 The design of new development should reflect or reinterpret the design of traditional buildings found on Exmoor. Although there may be particular circumstances which may direct a traditional response, it is considered that new development should be 'of its time'. It is therefore important that innovative and contemporary designs reinforce local distinctiveness to ensure that new buildings and development successfully fit in with their context, and continue to inspire building designs of exceptional quality in the future.
- 4.140 The design of new development will therefore be expected to be of the highest quality with some flexibility in terms of how this achieved – for example traditional materials, such as slate and local building stone, could be used in an innovative, contemporary

¹²⁸ DCLG (2012) National Planning Policy Framework (Section 7). Department of Communities and Local Government

design; or other natural, sustainable materials could be used in a traditional Exmoor layout and arrangement (e.g. a traditional one-and-a-half storey cottage with timber shingles and hemcrete walls).

LANDSCAPE CHARACTER AND SENSITIVITY

- 4.141 Development should enhance local landscape character (see policy CE-S1) and distinctiveness by ensuring that development takes account of landscape in terms of topography, existing landscape elements, and aspects.
- 4.142 Vernacular architecture has a strong relationship with landscape character and reinforces local distinctiveness, whilst providing a basis for the design of new development. Where there are variations in underlying geology and landform, there are identifiable links between the siting, design and materials of buildings in landscape character types and/or areas. The scale and proportion of buildings on Exmoor has generally been determined by the limitations of topography, local building materials and construction methods, which has established a scale and form which the design of new buildings should reflect.
- 4.143 A Landscape Sensitivity Study¹²⁹ was produced as part of the evidence base for the Local Plan, which assessed the landscape capacity for small scale housing development over the long term within or adjacent settlements¹³⁰. The study includes design recommendations in terms of scale, layout and massing within some areas of low or moderate sensitivity. Proposals will be expected to incorporate these recommendations.

STREET DESIGN

- 4.144 The design of streets has a significant influence on the layout and setting of a development. Streets are distinct from roads, in that the importance of 'place' is the primary focus, rather than movement. The materials, scale and proportion of new streets and their relationship with buildings will be fundamental to the success of the final design and its contribution to local distinctiveness. Streets should be designed to reflect local character, and respond to the historic form and layout of existing streets¹³¹. Surface materials are significant in helping to reinforce local distinctiveness, and may also be used sympathetically to delineate streets as social spaces where pedestrians and cyclists have priority over traffic¹³².
- 4.145 The excessive or insensitive use of highway signage and other street furniture has a detrimental impact on the success of the street as a place. Within the National Park it is particularly important to limit the visual impact of highway infrastructure, such as the inappropriate use of kerbing, signs, road markings and street furniture, which can have a detrimental urbanising effect on Exmoor's high quality built and natural environment¹³³ (AC-S2 Transport Infrastructure).
- 4.146 The traditional streetscape character of existing streets in settlements across the National Park is an important part of Exmoor's built heritage. The particular features that contribute to the streetscape will vary according to the settlement form and pattern and landscape character. Proposals should conserve or enhance the streetscape through positively reinforcing traditional features including boundary treatments, such as hedgerows or stone walls. The removal of such features should be avoided where it would individually or cumulatively impact on the streetscape.

¹²⁹ Bryan, P. (2013) Exmoor National Park Landscape Sensitivity Study 2013, *Exmoor National Park Authority, Dulverton*

¹³⁰ The Exmoor National Park Landscape Sensitivity Study assessed the 22 named settlements in the Exmoor National Park Local Plan 2001-2011 and Porlock Weir.

¹³¹ English Heritage (2005) Streets for All – South West

¹³² Design Council, *et al.* (2012) Building for Life 12

¹³³ Department of Transport (2007) Manual for Streets

LANDSCAPING

- 4.147 The landscaping of a site, including tree and shrub planting can help to ameliorate the impact of new development on landscape character. Such works can also have benefits for wildlife and enhance biodiversity. They can also provide shelter to help reduce heat loss from buildings, and shade to help with cooling - contributing to the sustainability of the development. Landscaping details must be provided with the submission of development proposals for outline and full planning permission and for the approval of reserved matters. This should illustrate details relating to the retention of existing trees, hedges and vegetation, in addition to the long term structural planting and maintenance¹³⁴.

MATERIALS, DESIGN ELEMENTS & DETAILING

- 4.148 The use of traditional, natural materials is critical in ensuring that the appearance of new developments conserves and enhances the quality and character of the built environment. The National Park Authority will therefore expect the use of traditional vernacular materials, such as natural slate, clay pantiles and combed wheat reed thatch for roofs, and encourage the use of local building stone and/or lime render for walls. Lime based materials including lime mortar and render should always be used for new development built of stone or for conversions of traditional buildings. These natural materials traditionally used on Exmoor take on a 'weathered' appearance with time which is aesthetically pleasing.
- 4.149 It is clear from extensive consultation, that many people favour natural sustainable materials, especially those that can be sourced relatively locally. There is some cross over between traditional building materials and local sustainable materials, such as local sources of building stone, and wheat reed for thatch and where available, local sources of such materials should be sought. Policy CE-S7 encourages the working of small scale quarries to provide local sources of building stone within the National Park.
- 4.150 Other local sustainable materials identified¹³⁵ include: timber, earth and cob, straw bales, and green roofs. There is an opportunity to derive both an economic benefit to the Exmoor area by sustainably exploiting these local building materials, and to enable a reduction in carbon emissions by using materials which are derived locally and minimally processed. Limestone quarries operate mainly on the Mendips in Somerset, and lime-based materials (for lime render or putty) can be sourced within Somerset and Devon.
- 4.151 Timber is one of the most versatile materials as it can be used structurally, as cladding, as roofing shingles, and for windows frames and doors. The National Park Authority will encourage the use of natural sustainable materials in the design of new developments particularly where local sources of such materials are used. The use of locally sourced building materials can also benefit the local economy by encouraging existing land based businesses to diversify (e.g. timber processing or farming businesses) and new businesses to be created.
- 4.152 In some cases, painted corrugated metal sheeting may be an appropriate traditional material for instance for roofing small buildings such as sheds and garages. Sustainable building materials which are formed from reconstituted or recycled materials are supported in principle, however they will be considered in terms of their impact on local distinctiveness and their contribution to the built character of the area.

¹³⁴ ENPA (2015) Requirements for the Submission of Planning and Other Applications, *Exmoor National Park Authority, Dulverton*

¹³⁵ Ecos Trust (2010) Audit of Local Sustainable Construction Materials in the Greater Exmoor Area, *Exmoor National Park Authority, Dulverton*

- 4.153 The treatment of individual design elements is of critical importance to a successful overall design and should be considered once the character of an area has been assessed and key principles of scale, massing and form have been addressed. The use of materials and detailing of elements such as doors and windows will have a significant bearing on how well a new development complements its surroundings. The National Park Authority will seek to ensure that such detailing will enhance the design of the development in a style and arrangement which contributes to and strengthens the local character. The National Park Authority expects that windows and doors should be constructed of timber since this is a both a traditional and sustainable material which has the potential to be grown locally. Timber detailing (windows, doors, weatherboards etc.) when in hardwood or pre-treated, can be repaired and have a long lifespan. There are examples of wooden windows on Exmoor which have lasted for well over 100 years. Metal-framed windows may be considered where it is clearly part of the local character of the area or reflects the elements of an original building to be replaced.
- 4.154 Some building materials are not considered appropriate in the National Park for aesthetic and environmental reasons. Such materials may be considered in exceptional circumstances (e.g. in the case of some minor extensions to post-war/non-traditional buildings) where existing materials may indicate such consideration and where it can be demonstrated that there will be no adverse impact on local character or heritage assets and their settings (CE-S4), and the design is of the highest quality.

SUSTAINABILITY STANDARDS

- 4.155 Sustainable design and construction techniques are fundamental to achieving development which takes a long term approach to minimising impacts on the environment and adapting to environmental change. This includes minimising energy use through energy efficiency measures and incorporating renewable energy systems (see CC-S5 Low Carbon & Renewable Energy).
- 4.156 Sharing services and facilities on larger developments helps to ensure the efficient use of resources and can reduce the visual impact overall. Maximising the site's resources and incorporating passive design techniques also makes effective use of natural energy resources through ground and air source heating, natural daylight, solar energy and heat gain, ventilation and cooling.
- 4.157 Sustainability standards include water conservation measures and adaptation to the threat of increasing risks from various forms of flooding (policies CC-D1 Flood Risk and CC-D2 Water Conservation) – taking into account the long term impacts of climate change. Water conservation technology can vary to relatively simple low-tech measures to installing grey water systems in buildings – helping to minimise the volume of potable water used by homes and businesses. In terms of flood risk adaptations, the implementation of sustainable drainage systems (SuDS) in new developments and re-developments is important to manage surface water run-off through softer engineering solutions that are similar to natural drainage systems and have multi-functional benefits including: providing wildlife habitats, minimising environmental damage and diffuse pollution, and open space provision¹³⁶.

¹³⁶ Environment Agency (2011) National flood and coastal erosion risk management strategy for England

- 4.158 Design principles should therefore incorporate and support sustainable building methods that help reduce carbon emissions and future-proof against the impacts of climate change¹³⁷. National policy advises that when setting local requirements for sustainable construction, Local Planning Authorities must be consistent with the Government's zero carbon buildings policy and adopt nationally prescribed standards¹³⁸. Adopting these standards not only improves the sustainability of buildings in the long term but also impacts on affordability by reducing/lowering the running costs. Where 'allowable solutions' are required to account for emissions that are not expected to be achieved on a site, the National Park Authority will consider opportunities for off-site carbon abatement within the National Park either where the developer can provide their own off-site abatement, through a third party or by payment into a fund¹³⁹.
- 4.159 Proposed changes to Building Regulations will consolidate technical standards for housing¹⁴⁰ to ensure that they are high quality, accessible and sustainable. Given the low levels of development within the National Park, it is not considered to be practical to set local standards for sustainable construction. However, proposals for new residential and non-residential development are encouraged to incorporate sustainable construction and passive design methods which not only address energy efficiency and seek to incorporate renewable energy technologies, but consider other sustainability issues such as waste, pollution, resource use, and health and well-being. Consultation has demonstrated clear support for incorporating sustainability requirements in new development, and reusing existing buildings and recycling materials where appropriate (policies GP4 The Efficient Use of Land and Buildings and CE-S5 Principles for the Conversion and Structural Alteration of Existing Buildings).

DESIGN & ACCESS STATEMENTS

- 4.160 Design & Access Statements (DAS) are required to accompany planning applications for:
- a) major developments¹⁴¹,
 - b) one or more dwellings, or
 - c) buildings with a floorspace of 100sqm or greater, or
 - d) listed building consent.
- 4.161 The DAS should explain the design principles and concepts that have been applied to the proposed development, as well as explaining how everyone will be able to use the proposed building or development. These statements provide developers and designers with an opportunity to demonstrate their commitment to good design, particularly how the development incorporates the key design principles set out in Policy CE-S6 below.
- 4.162 Policy CE-S6 applies to all types of development except agricultural and forestry buildings; the design aspects of which will be considered under policy SE-S4 (Agricultural and Forestry Development). In relation to the conversion of existing buildings proposals should accord with the principles set out in policy CE-S5.

¹³⁷ DCLG (2012) National Planning Policy Framework (Paragraphs 94, 95). Department of Communities and Local Government

¹³⁸ Zero Carbon Hub (2013) Zero Carbon Strategies

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

¹³⁹ DCLG (2014) Next steps to zero carbon homes – Allowable Solutions – Government response and summary of responses to the consultation

¹⁴⁰ DCLG (2014) Written Ministerial Statement – Building Regulations. Minister for Communities (Stephen Williams – March 2014) [Online] www.publications.parliament.uk, accessed 27/8/14

¹⁴¹ Major developments defined in: Statutory Instrument 201 No.2184 The Town and Country Planning (Development Management Procedure) (England) Order 2010

CE-S6 DESIGN AND SUSTAINABLE CONSTRUCTION PRINCIPLES

- 1. Development proposals should deliver high quality sustainable designs that conserve and enhance the local identity and distinctiveness of Exmoor's built environment and landscape character and in doing so applicants will be expected to demonstrate the following design principles:**
 - a) All development should positively contribute to its setting in terms of siting, massing, scale, height, orientation, density and layout.**
 - b) The materials and design elements of a building should complement the local context through the use of traditional and natural sustainable building materials. The use of locally-sourced sustainable building materials will be encouraged.**
 - c) Design should reinforce landscape character and the positive arrangement of landscape features through planting and landscaping schemes, boundary treatments, and surfacing. Existing features such as trees, hedges and stone walls should be retained particularly where they are characteristic of the streetscape and/or the local area.**
 - d) Design should have regard to health and well-being and ensure that sufficient public and/or private space is provided or available, and footpaths and cycleways are incorporated where appropriate.**
 - e) The design and layout of new development should have regard to improving safety, inclusivity and accessibility for those who live, work and visit there.**
 - f) The layout and design of new streets and associated infrastructure, required as part of development proposals, should respond to local character and the scale, and proportions of the historic street pattern. Opportunities for streets to be used as social spaces will be encouraged.**
 - g) The use and activity of the new development should not detrimentally affect the amenities of surrounding properties and occupiers including overlooking, loss of daylight, overbearing appearance, or other adverse environmental impacts.**
- 2. Proposals for new development should also demonstrate how they will incorporate sustainable construction methods that:**
 - a) promote the sustainable use of resources;**
 - b) reduce carbon emissions by improving or generating energy efficiencies including through renewable and low carbon technologies (CC-S5)**
 - c) Future proof against climate change impacts in accordance with CC-S1; and**
 - d) Provide adequate storage for recycling waste.**

EXTENSIONS

- 4.163 Where extensions to existing buildings are proposed, the design should usually ensure that such additions are subservient to the main building and that the roofline reflects the form and symmetry of the original. These measures ensure that the scale and massing of the extension are not disproportionate to the original, and do not over dominate the setting of the building in its wider context. Unheated structures such as roof cavities may be used as bat roosts (especially in the winter) and where these are present, proposals should ensure that these roosts are maintained or replaced. Pre-

application discussions with officers will help to ascertain whether an ecological survey is required.

- 4.164 Proposals to extend traditional buildings should have particular regard to the historic character and architectural interest of the building through use of traditional materials and detailing that reflect the vernacular of the original building. Extensions that are clearly residential in nature, such as conservatories and porches, are considered to be inappropriate additions to those traditional buildings which were built for non-residential purposes, such as barns¹⁴².

CE-D4 EXTENSIONS TO BUILDINGS

- 1. New additions or extensions to existing buildings should accord with the relevant policy considerations in terms of the existing or proposed use of the building, and will only be permitted where:**
 - a) they will complement the form, character and setting of the original building;**
 - b) the extension is appropriate in terms of scale and massing;**
 - c) the roofline of any extension respects the form and symmetry of the original building; and**
 - d) bat roosts are maintained or replaced.**
- 2. Extensions to traditional buildings should reflect and sustain the historic significance, character and appearance of the original building through the sensitive design and use of materials, detailing and construction principles to ensure the architectural interest, historic fabric and features, and setting of the building are conserved and enhanced.**

ADVERTISEMENTS AND PRIVATE ROAD SIGNS

- 4.165 Advertisements¹⁴³, including private road signs, are an important way of attracting customers and supporting the visitor trade, thereby helping the local economy. However, they need to be carefully managed in the interests of amenity to ensure that, individually and/or cumulatively they are compatible with the character of the landscape, street scene and individual buildings.
- 4.166 Poorly placed advertisements can have a negative impact on the built and natural environment in terms of individual proposals, and when viewed with other advertisements in relation to their potential cumulative and sequential landscape effects (CE-D1 Protecting Exmoor's Landscapes and Seascapes). Avoiding the proliferation of advertisements and signs helps ensure the conservation and enhancement protection of the National Park and its special qualities. Therefore, where signs are necessary consideration should be given to consolidating adverts/signage wherever possible so that proposals do not contribute to an obtrusive form of development that may result in a cluttered appearance in the landscape or built environment context. The use of existing structures should be considered to help avoid unnecessary additional free standing adverts/signs.

¹⁴² English Heritage (2006) Conversion of Traditional Farm Buildings: A Guide to Good Practice

¹⁴³ The term advertisement in this context includes: "any word, letter, model, sign placard, board, notice, awning, blind, device or representation, where illuminated or not ... used wholly or partly for ... advertisement, announcement or direction any hoarding or similar structure ... and anything else ... used, ... designed or adapted ... for use for the display of advertisements" – 336(1) of the 1990 Town and Country Planning Act, as amended by section 24 of the Planning Compensation Act (1991)

- 4.167 Advertising features such as banners, sun-blinds and internally illuminated signs that require express consent will be resisted as they are generally considered to be inappropriate features that do not reflect or conserve the traditional and historic character of Exmoor's buildings and street scene.
- 4.168 Different classes of advertisement and controls including guidelines for National Parks, Special Areas of Advertisement Control and Conservation Areas are set out in legislation¹⁴⁴. National Park Authority officers will advise whether express consent (planning application) is required. The whole of the National Park outside the Local Service Centres of Dulverton, Lynton & Lynmouth and Porlock is designated as an Area of Special Advertisement Control¹⁴⁵. This designation enables the National Park Authority to apply additional controls over the siting and appearance of most types of advertisements including stricter limits on the height and size of some advertisements and that some classes of advertisement may not be displayed. Applicants must also demonstrate a reasonable requirement for an advertisement. The control of advertisements should be subject to control in the interests of amenity and public safety, this includes cumulative impacts¹⁴⁶.
- 4.169 Additional controls usually apply to display advertisements on listed buildings and on the site of a scheduled ancient monument, as almost all development proposals in such cases will require listed building or scheduled ancient monument consent¹⁴⁷ in addition to any advertisement control. The National Park Authority encourages early discussions on any proposals, which will include advice on whether permission may be required.

AMENITY AND PUBLIC SAFETY

- 4.170 If advertisement consent is required the National Park Authority will take into consideration amenity, and public safety interests in terms of the advert/signage design (including the size, scale, proportions, siting, positioning, colour, size of lettering or symbols, amount of text and type of materials used. Where a sign is necessary, advertisements should respect the landform and quality of the immediate surroundings including the natural contours, landscape character and background features against which they will be seen¹⁴⁸. Therefore, to conserve and enhance the National Park, advertisements and private road signs should be designed to harmonise with the local area and setting and to reflect the high quality environment of the National Park. On occasions this may require a change to standardised corporate signage. Amenity considerations should also include maintaining advertisements to a high standard.
- 4.171 In determining applications consideration must be given to the safe use of advertisements, shopfronts and private road signs and any impacts on transport including road users and pedestrians. In achieving its purpose to attract attention, consideration will also be paid to whether the advertisement or private road sign itself or location proposed is likely to be so distracting or confusing that it creates a hazard or presents a danger to people in the vicinity. It should be kept in a safe condition and be removed safely when required. Crime prevention and detection are also relevant factors¹⁴⁹.

¹⁴⁴ HM Government (2007) Statutory Instrument 2007 No.783 Town and Country Planning (Control of Advertisements) (England) Regulations 2007

¹⁴⁵ HM Government (1990) Town and Country Planning Act 1990 (As Defined under Section 221)

¹⁴⁶ DCLG (2012) National Planning Policy Framework (Paragraph 67). Department of Communities and Local Government

¹⁴⁷ Applications for Scheduled Monument Consent must be made to Historic England.

¹⁴⁸ HM Government (2007) Town and Country Planning (Control of Advertisements) (England) Regulations (2007)

¹⁴⁹ Further information on amenity and public safety considerations are provided by: DCLG (2007) Circular 03/07, Town and Country Planning (Control of Advertisements) (England) Regulations 2007

CE-D5 ADVERTISEMENTS AND PRIVATE ROAD SIGNS

- 1. Advertisements, and private road signs will only be permitted where it can be demonstrated that in the interests of amenity:**
 - a) the proposal represents a joint or community advertisement or sign; or**
 - b) the advertisement is located on, or is well related to the building that is used for the business or attraction; and**
 - c) there will be no adverse individual, cumulative, or sequential impact on landscape character and local distinctiveness of the locality; and**
 - d) the size, scale, colour and siting are appropriate and the materials and design are of a high standard which conserve or enhance the character and appearance of the area.**
- 2. The proposal should have no detrimental impact on public safety.**
- 3. Opportunities to enhance existing buildings or the landscape through consolidating, redesigning or removing existing advertisements / signage will be encouraged.**

SHOPFRONTS

- 4.172 Traditional shopfronts play an important role in contributing to the built heritage of Exmoor's settlements and for this reason, the National Park Authority will seek their retention and restoration will be encouraged over replacement. The use of vernacular design, traditional materials and proportions appropriate to the scale of the building and its surroundings will be required for proposals relating to existing and new shopfronts to ensure that the architectural character of buildings and the overall visual quality of the street scene is conserved and enhanced.

CE-D6 SHOPFRONTS

- 1. Traditional shopfronts will be retained and restoration will be encouraged where appropriate.**
- 2. The provision of new shopfronts or the replacement or alteration of non-traditional shopfronts will be permitted where it can be demonstrated that the scale, colour, materials and design are of a high standard which conserve and enhance the character and appearance of the host building and the wider streetscape.**

MINERALS

Objective 5. *To ensure that the built tradition, character, distinctiveness and historic character of Exmoor's settlements, buildings, farmsteads, landscapes, archaeological sites and monuments is conserved and enhanced and that the cultural heritage of Exmoor is protected through the careful management of development.*

Objective 6. *To encourage new development to use local materials, sustainable building design and methods, in ways that contributes to the distinctive character and cultural heritage of Exmoor.*

Objective 7. *To conserve and enhance Exmoor's natural resources and to improve air and water quality, conserve water resources, ensure soils are in good condition, maximise carbon storage, and minimise pollution.*

CONTEXT

- 4.173 The National Park Authority is the Minerals Planning Authority within the National Park and is responsible for determining applications for minerals related development. Despite a long history of mineral extraction on Exmoor there are, at present, no operative mines or quarries within the National Park although stone is always in demand and deposits of silver, lead, copper and iron ore, in particular, may still exist. In addition, there are a number of disused quarries on Exmoor which were primarily used for obtaining local building stone. Policies therefore seek to encourage the small scale working or reworking of quarries, to provide a local source of building and roofing stone.
- 4.174 Many of Exmoor's older buildings were constructed of the local Devonian Sandstone. However, due to the geology of Exmoor other stone is used at various localities – in the Lynton area grey sandstone was used and 'new red' sandstones in the eastern area of the National Park. Softer sandstones were also quarried near Porlock.
- 4.175 The National Parks Circular¹⁵⁰ recognises that National Parks are a source of some minerals, including certain building stone and small quarries which provide building materials to maintain the character of the local built heritage. Quarry works may also provide employment within the Park boundary. It is important therefore, that the need for minerals and the impacts of extraction and processing on people and the environment are managed in an integrated way.
- 4.176 The Government adopts a sustainable approach to minerals development and recognises the importance of a sufficient supply of material to provide infrastructure, buildings, energy and goods that are required. The National Planning Policy Framework recognises that since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation. This can be achieved by adopting a hierarchical approach to minerals supply, which aims firstly to reduce as far as practicable the quantity of material used and waste generated, then to use as much recycled and secondary material as possible, before finally securing the remainder of material

¹⁵⁰ DEFRA (2010) English National Parks and the Broads UK Government Vision and Circular (Paragraphs 141- 145)

needed through new primary extraction. Minerals development is different from other forms of development because minerals can only be worked where they naturally occur. Potential conflict can therefore arise between the benefits to society that minerals bring and impacts arising from their extraction and supply.

- 4.177 Large scale mineral extraction is not appropriate in the National Park as it would have an adverse impact on National Park purposes. The Exmoor National Park Authority seeks to ensure sufficient levels of permitted reserves are available from outside National Parks owing to the major impact of modern mineral extraction on the landscape, wildlife, cultural heritage, public enjoyment and local communities. The National Park has worked with both Devon and Somerset County Councils to ensure the needs of the Exmoor National Park are taken into account in their minerals planning including that the Local Aggregate Assessments (LAAs) for Somerset and Devon includes the relevant areas of the National Park as appropriate.
- 4.178 Small scale minerals extraction in the National Park would enable the provision of materials necessary for preserving traditional buildings and for maintaining and enhancing the character of settlements and the landscape character of the National Park. Consultation has indicated the need for local building material for the conservation and repair of buildings and structures of historic and cultural importance. Both national policy and policies within this plan encourage developers to use traditional local materials in development proposals. Some materials can be salvaged and reused, while quarries just outside the National Park are another valuable source. However, these options are not always practicable, economic or suitable. Stone, for instance, is most appropriate when it is of the same composition as nearby traditional building stone. To achieve a supply of local building stone the National Park Authority will provide for the small-scale mineral extraction or the reopening of disused quarries in appropriate circumstances. Consideration will need to be given on how to meet any demand for small scale extraction of building stone at, or close to, relic quarries needed for the repair of heritage assets, taking account of the need to protect designated sites (CE-S3). In accordance with government guidance it is recognised that there will be a need for a flexible approach to the potentially long duration of planning permissions reflecting the intermittent or low rate of working at many sites.
- 4.179 All proposals will be subject to a requirement to include a scheme for high quality restoration and aftercare of the worked land. Such schemes should seek to achieve the conservation and enhancement of the National Park including for geodiversity and biodiversity, in accordance with policy CE-S3 Biodiversity and Green Infrastructure, native woodland, historic environment and quiet enjoyment of its special qualities. Large scale mineral extraction will be regarded as major development and will therefore be considered against policies CE-S9 Major Mineral Extraction and GP2 Major Development. In the past the National Park Authority has received proposals for mineral exploration which generally have involved drilling. Such proposals will need to be assessed against the General Policies in Section 3 and Policy CE-S7 below.

CE-S7 SMALL SCALE WORKING OR RE-WORKING FOR BUILDING AND ROOFING STONE

- 1. Proposals for small scale quarries or the reworking of existing small quarries to provide building or roofing stone, including for the repair of heritage assets, will be permitted where it can be clearly demonstrated that:**
 - a) there is a demonstrable need within the National Park and any minerals won will be for use within the National Park;**
 - b) proposals would help to provide local employment and reduce ‘stone’ miles;**
 - c) there is suitable access and it is of a scale appropriate for its location in the National Park;**
 - d) it would not adversely affect the landscape character, wildlife, cultural heritage, geodiversity, special qualities, tranquillity of the National Park, or the health or amenity of local communities;**
 - e) there are no suitable sources of previously used or banked materials that are reasonably available;**
 - f) the local building material cannot be sourced sustainably from elsewhere, including from outside the National Park, and the loss of supply would result in the devaluing of the built fabric of the National Park;**
 - g) permitted operations do not have unacceptable adverse impacts on the natural and historic environment or human health, including from noise, dust, visual intrusion, traffic, tip and quarry-slope stability, differential settlement of quarry backfill, mining subsidence, increased flood risk, impacts on the flow and quantity of surface and groundwater and migration of contamination from the site; and take into account any cumulative effects of multiple impacts of individual sites; and**
 - h) recognise that some noisy short-term activities, which may otherwise be regarded as unacceptable, are unavoidable to facilitate minerals extraction. But ensure that any unavoidable noise, dust and particle emissions and any blasting vibrations are controlled, mitigated or removed at source, and establish appropriate noise limits for extraction in proximity to noise sensitive properties.**
- 2. Any waste materials from extraction will be re-used or recycled. A scheme for restoration and after-use of the site should be submitted with the application to ensure that it will be carried out to high environmental standards, based upon conservation and enhancement of landscape character, geodiversity, biodiversity, and the historic environment.**
- 3. Conditions may be applied to limit the annual extraction rate.**

MINERALS SAFEGUARDING AREAS

- 4.180 In accordance with Government policy¹⁵¹, the National Park Authority has defined Minerals Safeguarding Areas, which are known locations of specific minerals resources of local and national importance, and are identified to ensure that they are not needlessly sterilised by non-mineral development, whilst not creating a presumption

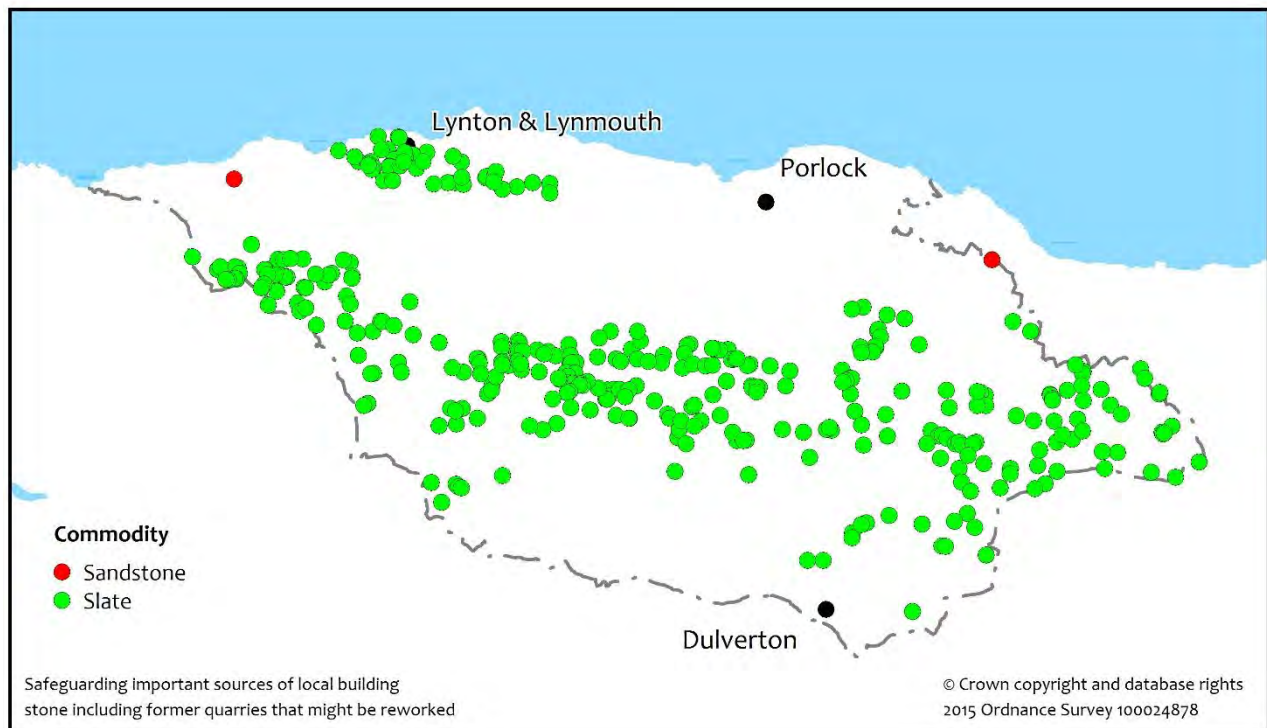
¹⁵¹ DCLG (2012) National Planning Policy Framework (Paragraph 143). Department of Communities and Local Government

that resources defined will be worked. However, there is no presumption that applications to extract the mineral resources defined in Minerals Safeguarding Areas will be granted permission. Neither does a Minerals Safeguarding Area automatically preclude other forms of development. What it does, is draw attention to the presence of important mineral resources and make sure that they are adequately and effectively considered in land-use planning decisions. Within the National Park the safeguarded minerals are sources of building stone as identified in the Building Stone Atlas of Somerset and Exmoor¹⁵² and include small derelict building stone quarries. Policy CE-S8 will be applied in all decisions where an application for non-mineral development is proposed within defined Minerals Safeguarding Areas (see Map 4.3).

CE-S8 MINERAL SAFEGUARDING AREAS

- 1. Development proposals for non-mineral development within minerals safeguarding areas will be permitted where it will not compromise the future extraction of important building stone at existing or former quarries unless:**
 - a) the mineral can be extracted satisfactorily prior to the development taking place; or**
 - b) the development is of a temporary nature, can be completed and the site restored to a condition that does not inhibit extraction within the timescale that the mineral is likely to be needed; or**
 - c) there is an overriding need for the development.**

Map 4.3 Minerals Safeguarding Areas



¹⁵² English Heritage *et al.* (2011) Strategic Stone Study – A Building Stone Atlas of Somerset & Exmoor

CE-S9 MAJOR MINERAL EXTRACTION

- 1. Proposals for large scale mineral extraction will not be permitted in the National Park unless in exceptional circumstances. Such proposals will be considered against the major development tests set out in policy GP2: major development, and should be demonstrated to be in the public interest before being allowed to proceed.**
- 2. If the tests for major development are met, the development and all restoration will be subject to a planning obligation to ensure:**
 - a) the development should be carried out to high environmental standards and respond to the local landscape character including its natural topography;**
 - b) ensure that any unavoidable noise, dust and particle emissions and any blasting vibrations are controlled, mitigated or removed at source, and establish appropriate noise limits for extraction in proximity to noise sensitive properties;**
 - c) any waste materials from extraction will be re-used or recycled; and**
 - d) a scheme for restoration and after-use of the site should be submitted with the application to ensure it will be carried out to high environmental standards based upon conservation and enhancement of landscape character, geodiversity and biodiversity, and the historic environment.**

INTERIM DEVELOPMENT ORDERS

- 4.181 Interim Development Order permissions were originally granted between 23 July 1943 and 1 July 1948, prior to full planning controls being introduced in 1948. The 1991 Planning and Compensation Act required Interim Development Order Permissions to be registered with the National Park Authority by 25 March 1992 or they would otherwise lapse. This provided a means of removing still valid planning permissions from sites where working had never started or long ceased but where re-opening could have serious environmental impacts beyond the control of the Planning Authority. Only one such site, at Barlynch near Dulverton, was registered under this system.
- 4.182 The working of Barlynch Quarry cannot recommence until a scheme of operating and restoration conditions has been approved by the National Park Authority as the Minerals Planning Authority. There is no time limit for submission of an application for such approval.

CE-D7 INTERIM DEVELOPMENT ORDER PERMISSIONS

- 1. Interim Development Order permissions will be subject to an environmental impact assessment that will determine a set of comprehensive conditions in order to mitigate and control any adverse impact on the National Park's landscape, wildlife, geodiversity, cultural heritage, other special qualities, its enjoyment or local communities of Exmoor and to ensure satisfactory restoration and after-care of the site. Particular regard will be paid to:**
 - a) the visual impact on the landscape;**
 - b) the potential effect on ecological, archaeological and historical features;**
 - c) the potential effect on the amenity of local communities or visitors in terms of noise, disturbance, and pollution (including light and dust) and the quiet enjoyment of the National Park;**
 - d) the potential impact on the recreational use of the area;**
 - e) hours of operation; and**
 - f) access, traffic generation and highway safety.**

5. RESPONDING TO CLIMATE CHANGE AND MANAGING RESOURCES

Objective 18: *To minimise the net emissions of carbon dioxide and other greenhouse gases into the atmosphere, and support measures which contribute to carbon neutrality in ways that both conserve and enhance the National Park.*

Objective 19: *To adapt to the anticipated effects of climate change on Exmoor's communities, businesses, landscape, wildlife and coast including flood risk, sea level rise, and unexpected weather events and so on.*

Objective 20: *To minimise waste and emissions and support opportunities for reuse and, recycling in ways compatible with Exmoor's National Park designation.*

CLIMATE CHANGE MITIGATION AND ADAPTATION

CONTEXT

- 5.1 Climate change is likely to be one of the most significant challenges facing Exmoor in the future. It is expected to impact on all aspects of the National Park – its natural beauty, wildlife and cultural heritage, the special qualities that people visit to enjoy and understand, and on local communities and economic activity. The UK Climate Projections 09¹⁵³, predict significant changes to Exmoor's climate across a range of different greenhouse gas emissions scenarios. In all cases, a rise in temperature is seen to be a highly probable outcome, with the main doubt being around by how much temperatures will rise. The main consequences of this change in climate are likely to be hotter, drier summers, and warmer, wetter winters that are characterised by periods of long duration rainfall. In contrast, frequent and short duration, high-intensity rainfall linked with longer drier summers is predicted. There is also likely to be a rise in sea level and increased storminess at the coast¹⁵⁴. These scenarios could potentially cause increased flooding from fluvial, surface water, coastal and tidal flooding. Although the exact nature of these changes on Exmoor is not known, the impacts on way of life are likely to be significant. Exmoor's communities therefore need to plan to mitigate and adapt to climate change, facing up to the threats it poses and taking advantage of any opportunities presented.
- 5.2 The Government has set statutory targets to reduce carbon dioxide emissions by 80% by 2050, with at least a 34% reduction by 2020¹⁵⁵. The main sources of emissions of greenhouse gases from Exmoor are land management (including agricultural activity, land use change and forestry), energy and transport. Energy use accounts for 18% of Exmoor's carbon footprint, principally comprising carbon dioxide emissions from the burning of fossil fuels from the domestic and commercial sectors. Transport makes up about 17% of Exmoor's carbon footprint, arising from carbon dioxide emissions from vehicle movements within the National Park¹⁵⁶. National Parks are expected to lead the way in adapting to and mitigating climate change as exemplars of sustainability¹⁵⁷, and the Vision includes a commitment to work towards becoming a carbon neutral National Park.

¹⁵³ DEFRA (2009) Adapting to Climate Change - UK Climate Projections. Department for the Environment, Food and Rural Affairs.

¹⁵⁴ Scott Wilson (2009) Strategic Flood Risk Assessment Level 1 Report prepared for West Somerset Council and Exmoor National Park Authority. *Exmoor National Park Authority, Dulverton.*

¹⁵⁵ HM Government (2008) Climate Change Act.

¹⁵⁶ ENPA (2010) Carbon Neutral Programme Consultation 2010. *Exmoor National Park Authority, Dulverton.*

¹⁵⁷ DEFRA (2010) English National Parks and the Broads UK Government Vision and Circular (Paragraph 4.2)

- 5.3 The Local Plan can only influence the spatial planning aspects of climate change mitigation and adaptation. These are set out below. As climate change is such a cross-cutting issue, many of the policies in this Plan will contribute to meeting the challenges of both reducing greenhouse gases, and adapting to changes in climate. In particular, policies on increasing the efficiency of existing and new build development through re-use, retrofitting, design and sustainable construction (policies CE-S5, CE-S6); encouraging more sustainable modes of travel and reducing the need to travel (policy AC-S1); and enabling wildlife and heritage assets to adapt to a changing climate (policies CE-S4, CE-D3) will be important.

CLIMATE CHANGE MITIGATION

- 5.4 Since energy use accounts for 18% of Exmoor's carbon footprint, minimising energy use and increasing energy efficiency are effective ways to reduce carbon emissions. Energy consumption can be significantly reduced through the location of development, site layout and building design, the type of materials used, and the prudent use of existing and new resources (policy CE-S6). Once the demand for energy has been minimized, the incorporation of low carbon or renewable energy technologies within existing properties or new build development will also help to reduce the National Park's carbon footprint. Small-scale renewable energy schemes that are carefully sited and designed to avoid harm to sensitive habitats and wildlife, can also have a part to play. Policy CC-S5 provides more detail on renewable energy.
- 5.5 All development, including replacement and enhancement schemes, will need to demonstrate how it has had regard to the energy hierarchy by:
- a) reducing the need for energy;
 - b) using energy more efficiently; and
 - c) using low carbon and renewable energy.
- 5.6 As climate change could lead to increased pressures on water resources, the conservation and prudent use of water resources will also be important in future. Reducing the demand for water, and improving the efficiency with which it is used through, for example, rainwater and greywater harvesting and water conservation technologies can also be encouraged during refurbishment of existing properties and through high standards of sustainable design and construction with new build development as set out in policy CC-D2.
- 5.7 Other components of the National Park's carbon footprint arise from agricultural activity, land use change and forestry. Changes to land use and land management and increased carbon storage in peat and woodland provide important opportunities for reducing greenhouse gas emissions and are highlighted in the Exmoor National Park Partnership Plan. Whilst these measures do not directly fall within the planning system, associated development (or change of use) may be required.

CLIMATE CHANGE ADAPTATION

- 5.8 The Exmoor Climate Change Adaptation Study¹⁵⁸ sets out a range of responses to climate change, including managing flood risk and coastal change, ensuring existing and new buildings are well adapted, helping wildlife and habitats to be more resilient, and managing changes to the landscape and historic environment resulting from a changing climate or necessary mitigation measures.
- 5.9 The UK Climate Projections indicate that changes in the duration and intensity of rainfall, sea level rise and increased storminess at the coast could increase the risk of flooding on Exmoor. Milder, wetter winters, characterised by periods of long duration

¹⁵⁸ ENPA (2011) Preparing for Climate Change. *Exmoor National Park Authority, Dulverton.*

rainfall are predicted, along with longer drier summers with frequent and short duration, high-intensity rainfall. These scenarios are likely to cause increased flooding from fluvial, surface water and sewer sources. In addition, the effects of climate change on sea level will increase the likelihood of coastal and tidal flooding in low lying areas.

- 5.10 The management of water flow is one of the key aspects of catchment management as concentrated periods of high rainfall can lead to flash flood events. Rapid run-off is thought to have been exacerbated by land drainage schemes on the moors and high ground and by compacted soils which are unable to absorb high intensity rainfall. Farm and forestry tracks, bridleways and footpaths act as pathways for water and high intensity rainfall also exacerbates erosion. Different approaches to reduce flood risk through good rural land management are being tested which could benefit properties in Bossington, Allerford, West Luccombe and Horner through changes in rural land management in the catchment, slowing down the passage of water and reducing rapid run off¹⁵⁹. Some of these land management techniques include controlling headwater drainage, reducing run-off along tracks and paths, creating new woodlands and retaining water on lowland flood meadows.
- 5.11 Policy CC-S1 directs development away from areas at risk of flooding and encourages land management that reduces flood risk by increasing infiltration and flood storage, slowing down the passage of water into rivers, avoiding soil compaction and erosion. Further detail is set out in Policies CC-D1 Flood Risk, CC-S2 Coastal Development, and RT-D12 Access Land and Rights of Way. Policy CC-S3 Porlock Weir Coastal Change Management Area recognises the need to adapt to coastal changes which could have important implications for some of Exmoor's communities.

CC-S1 CLIMATE CHANGE MITIGATION AND ADAPTION

- 1. Climate change mitigation measures will be encouraged by:**
 - a) Promoting the energy hierarchy through: first reducing the need for energy; then using energy efficiently; and using small scale low carbon and renewable energy including through sustainable design and construction (GP1 and CE-S6).**
 - b) Avoiding sites that would put wildlife at risk.**
 - c) Measures that ensure sustainable and efficient water supplies and reduce the demand for water including through water conservation.**
 - d) Measures that support the management of uplands and woodlands to assist in carbon sequestration and storage.**
- 2. Proposals to adapt to the consequences of climate change will be encouraged by:**
 - a) Avoiding development in areas at risk of flooding (CC-D1).**
 - b) Improving the resilience of development, essential services and infrastructure to cope with changes in climate.**
 - c) Promoting land management which reduces the overall risk of flooding in and around the area, working with natural processes.**

¹⁵⁹ DEFRA (2011) Multi Objective Flood management Demonstration Project

FLOOD RISK

- 5.12 Flood risk can arise from fluvial, surface water and tidal flooding. A large part of central Exmoor forms the upper part of the Exe catchment, is drained by the River Exe itself and its main tributary, the River Barle. The west side of the National Park is drained by the rivers Yeo, Mole and Bray into the River Taw. The northern side of the National Park is drained by shorter rivers and streams running north into the Bristol Channel including the Umber, Heddon and West and East Lyn in the west and the Hawkcombe Stream, Horner, Aller, Aville and Washford Rivers in the east. Many of the watercourses on Exmoor flow through steep confined valleys which respond rapidly to rainfall. Settlements on the coast, particularly Lynmouth, Porlock and Porlock Weir, are vulnerable to coastal change and flood risk.
- 5.13 The Environment Agency (EA) is responsible for managing the risk of flooding from main rivers, large reservoirs, estuaries and the sea, and must be consulted on certain applications. Somerset and Devon County Councils are the Lead Local Flood Authority¹⁶⁰ and are responsible for managing local flood risks, involving flooding from surface water, ordinary watercourses, groundwater and small reservoirs. North Devon and West Somerset District councils also act as coastal erosion risk management authorities. The management of storm water and foul water is the responsibility of South West Water (SWW), Wessex Water (WW), Somerset and Devon County Councils. In addition, private individuals may be responsible for drainage systems that operate prior to discharge either into a watercourse or into a public sewer. SWW and WW are the statutory water undertakers responsible for the public sewer systems. SWW is responsible for the majority of the ENPA administrative area, including the principal settlements of Dulverton, Lynton and Lynmouth. WW is responsible for public sewer systems within the principal settlement of Porlock. There are currently no flooding issues to properties attributable to the public sewer system.
- 5.14 Flood risk on Exmoor has been assessed through the Strategic Flood Risk Assessment (SFRA¹⁶¹), taking into account tidal, fluvial and surface water flood risk and the implications of climate change. The SFRA defines Flood Zones 3a (high risk) and 3b (functional floodplain) within the principal local service centres of Dulverton, Porlock and Lynton and Lynmouth. For areas outside of these settlements, the precautionary approach has been adopted whereby the whole of Flood Zone 3 is considered to constitute the functional floodplain. Flood risk zones are shown on the Policies Map (as combined Flood Zones 2 and 3). Other potential flood sources (such as surface water flooding), and records of historic flood events are shown in the SFRA and on the Environment Agency's website¹⁶². Areas not lying within Flood Zone 2 or 3a/b are classified as Flood Zone 1 (lowest risk). Porlock Weir is highlighted in the SFRA as the settlement most affected by tidal/coastal flooding.
- 5.15 The presence of formal raised manmade flood defences within the National Park is limited. Long term planning for flood risk within the National Park is set out in Catchment Flood Management Plans¹⁶³ (CFMP) to cover fluvial and tidal flood risk, and Shoreline Management Plans (SMP) dealing with coastal flood risk. The National Park is covered by three CFMPs: North Devon, East Devon (covering the Exe) and South and West Somerset. These provide a catchment overview of the main sources of flood risk and how these can be managed in a sustainable way for the next 50 to 100 years. The policy options range from no active intervention, to taking further action to reduce flood risk. The policy options for the catchment units within the National Park are

¹⁶⁰ Designated under the Flood and Water Management Act (FWMA) 2010

¹⁶¹ Scott Wilson (2009) Strategic Flood Risk Assessment Level 1 Report prepared for West Somerset Council and Exmoor National Park Authority. *Exmoor National Park Authority, Dulverton.*

¹⁶² Environment Agency (2015) What's in my backyard?

¹⁶³ Environment Agency (2009) Catchment Flood Management Plans

summarized in the SFRA and will be taken into account in decision-making relating to Policies CC-S1 and CC-D1.

- 5.16 Flooding from artificial sources occurs when storage features, such as reservoirs become overwhelmed as a result of dam or bank failure. The likelihood of failure is low due to regular inspection and maintenance, however, in the event of a breach, the consequences are likely to be significant. There are five reservoirs on Exmoor- Challacombe, Pinkery Pond, Holywell, Nutscale and Wimbleball- and the maximum flood extent from these is shown on the in the SFRA and on the Environment Agency’s website.
- 5.17 The North Devon and Somerset Shoreline Management Plan (SMP2)¹⁶⁴ covers the stretch of coast from Hartland Point in Devon to Anchor Point in Somerset and includes the whole of the Exmoor coastline. It provides information regarding the risks of coastal change and the preferred strategy when considering future development and land use change on the coast, taking into account the impacts of climate change, risks to people and the developed, historic and natural environment. The Exmoor coastline is largely undeveloped and dominated by steep cliffs interspersed by steep sided valleys and Porlock Vale. The SMP2 approach to coastal change is to continue to allow it to evolve naturally to conserve important landscape characteristics; however it is proposed that the sea defences at Lynmouth will be maintained. At Porlock Weir it is proposed that there is no active intervention, and the policy approach is set out in CC-S3 and CC-S4. Natural coastal evolution will be allowed to continue along the Porlock shingle ridge area.
- 5.18 The NPPF¹⁶⁵ advocates that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk or, where development is necessary, making it safe without increasing flood risk elsewhere. Impacts from coastal change should also be avoided (policies CC-S2 and CC-S3).

FLOOD ZONES AND THE SEQUENTIAL TEST

- 5.19 Flood zones have been developed by the Environment Agency as set out in Table 5.1 below, with the risk of flooding increasing as you move down the table.

Table 5.1 Flood Zone Definitions¹⁶⁶

Flood Zone	Definition
Flood Zone 1	Low probability - Defined as zone where there is a less than 1 in 1000 annual probability of river or sea flooding in any year.
Flood Zone 2	Medium probability - Defined as having between a 1 in 100 year and 1 in 1000 year annual probability of river flooding or between a 1 in 200 year and a 1 in 1000 year annual probability of sea flooding in any year.
Flood Zone 3a	High probability - Defined as having a 1 in 100 or greater annual probability of river flooding (>1%) or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year.
Flood Zone 3b	Functional floodplain - Defined as land where water has to flow or be stored in times of flood.

- 5.20 National policy sets out a sequential test for assessing the flood risk of proposed development¹⁶⁷. The Sequential Test is a simple decision-making tool designed to ensure that sites at little or no risk of flooding are developed in preference to areas at higher risk. Development should avoid areas of flood risk, and the presumption is that

¹⁶⁴ North Devon & Somerset Coastal Advisory Group (2010) Draft North Devon & Somerset Shoreline Management Plan 2

¹⁶⁵ DCLG (2012) National Planning Policy Framework (Paragraphs 100-108). Department of Communities and Local Government

¹⁶⁶ DCLG (2015) Planning Practice Guidance: Flood Risk and Coastal Change, Table 1. Note: These Flood Zones refer to the probability of river and sea flooding, ignoring the presence of defences, Paragraph: 065

¹⁶⁷ DCLG (2012) National Planning Policy Framework (Paragraph 100). Department of Communities and Local Government

all development should be located within Flood Zone 1 (areas with the least risk of flooding). Where this is not possible, then sites within Flood Zone 2 can be considered (areas of low to medium risk). Only where there are no reasonably available sites in Flood Zones 1 or 2 should the suitability of sites in Flood Zone 3 (highest risk) be considered, taking into account the flood risk vulnerability of the type of development proposed¹⁶⁸. The National Park Authority will consult the Environment Agency on any proposals within flood risk areas. A sequential approach should be used in areas known to be at risk from any form of flooding. Other sources of flooding (not included in the flood zones), which require consideration, are surface and ground water flooding, and flooding from sewers and artificial sources. The National Park Authority will consult the Lead Local Flood Authority on proposals which raise surface water or other local flood risk issues.

- 5.21 If, following application of the Sequential Test, it is not possible for the development to be located in zones of lower probability of flooding, the Exception Test can be applied to allow necessary development to occur whilst managing flood risk. For the Exception Test to be passed it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk. In addition, a site-specific Flood Risk Assessment (FRA) must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall¹⁶⁹. A site-specific Flood Risk Assessment (FRA) will be required for proposed development (except minor development) within Flood Zones 2 or 3, and for any applications within Flood Zone 1 over 1 hectare or in an area which has critical drainage problems¹⁷⁰. The Environment Agency¹⁷¹ also advises that FRAs should be undertaken if the development site is located in an area known to have critical flooding problems from any flood source; the development is located within 20m of any watercourse regardless of Flood Zone classification; or liaison with the National Park Authority identifies the requirement for a FRA. Where the development type is highly vulnerable, more vulnerable, less vulnerable or essential infrastructure¹⁷², and a site is impacted by a recurrent flood source (other than tidal or fluvial), the site and flood sources should be investigated further as part of a FRA.
- 5.22 Further advice on undertaking site-specific FRAs is available from the Environment Agency website. The Environment Agency publishes maps of flood risk on its website, and these should be referred to along with the SFRA as the most up to date source of information on flood risk. These maps are kept up to date, and will be used in the consideration of this policy.
- 5.23 Development should not increase flood risk elsewhere, and surface water run-off from new development should be minimized through careful location, layout and design including the use of sustainable drainage systems (SuDs) such as permeable materials, rainwater harvesting, filter strips and swales, soakaways, or ponds (CE-S6). The surface water drainage arrangements for any development site should be such that the volumes and peak flow rates of surface water leaving a developed site are no greater than rates prior to the proposed development, unless specific off-site arrangements are made and result in the same net effect. In the absence of Flood Zones 2 and 3, the Flood Map for Surface Water will be used to identify areas prone to surface water

¹⁶⁸ DCLG (2015) Planning Practice Guidance: Flood Zone and Flood Risk Tables, Table 2: Flood Risk Vulnerability Classification, Paragraph: 066 Reference ID: 7-066-20140306

¹⁶⁹ DCLG (2012) National Planning Policy Framework (Paragraph 102). Department of Communities and Local Government

¹⁷⁰ DCLG (2012) National Planning Policy Framework (Paragraph 103, footnote 20). Department of Communities and Local Government

¹⁷¹ DEFRA (2015) Flood Risk Assessment: Local Planning Authorities

¹⁷² DCLG (2015) Planning Practice Guidance: Flood Zone and Flood Risk Tables, Table 2: Flood Risk Vulnerability Classification, Paragraph: 066 Reference ID: 7-066-20140306

flooding. Where development is proposed within these surface water flood map extents, further investigation may be required as part of a site-specific FRA. Applicants should consult the Environment Agency and the National Park Authority¹⁷³ when considering the design of sustainable drainage systems.

- 5.24 If, having applied the sequential approach and exception tests, development proceeds in an area of flood risk, residual risks should be managed including through flood resilience or resistance measures, (although these should not be used to justify development in inappropriate locations). Development design must be appropriate to the degree of flood risk identified, for example flood-resilient construction may be required to reduce the consequences of flooding and facilitate recovery from the effects of flooding sooner than conventional buildings. This may be achieved through designing buildings so that water can flow through lower levels, the use of water-resistant materials for floors, walls and fixtures and the siting of electrical controls, cables and appliances at a higher than normal level. In some circumstances, flood-resistant construction may be required, which can prevent entry of water or minimise the amount of water that may enter a building where there is flooding outside. Safe access and escape routes accounting for climate change must also be provided and agreed with the Environment Agency for developments within Flood Zones 2 and 3.
- 5.25 Where permission is granted, developer contributions towards providing the necessary flood defences will be sought.

MANAGING FLOOD RISK ON EXMOOR

- 5.26 Some existing infrastructure is at risk of flooding. Transport links within West Somerset, such as the A39 in the vicinity of Williton, Ellicombe and Dunster Marsh, and transport routes within Exmoor National Park such as the A396 around Timberscombe/Dunster and Dulverton are affected by fluvial flooding (see AC-S2 Transport Infrastructure). The Police Station and Fire Station are also at risk from fluvial flooding in Dulverton. Surface water flooding is typically generated by short duration, intense rainfall events where rainfall is unable to infiltrate the ground or enter drainage systems.
- 5.27 Land used for holiday or short-let caravans and camping, and permanently occupied caravan and mobile home sites give rise to special problems in relation to flooding. Caravan or mobile home sites intended for permanent occupation are regarded to be at higher risk (classified as 'highly vulnerable')¹⁷⁴. The instability of such structures places their occupants at special risk and they are likely to be occupied throughout the year including the winter months when flood risk is likely to be higher. Sites intended for temporary occupation are considered to be at lower risk (classified as 'more vulnerable') because they are usually occupied during the summer when flood events are less likely to occur, although they may be located for amenity and recreational reasons on coastal or riverside sites with a high residual risk of flooding. Consequently, permanently occupied sites ('highly vulnerable' development) will not be permitted in Zones 3a and 3b, and temporarily occupied sites ('more vulnerable' development) will not be permitted in Zone 3b (functional floodplain).
- 5.28 Flood watch areas¹⁷⁵ have been established in several parts of the National Park, where the Environment Agency provides a flood warning system. Emergency responses to extreme flood events are co-ordinated via the Somerset and Devon Flood Warning Response Plans bringing together the emergency services, local authorities and other partners.

¹⁷³ ENPA is designated as the relevant Sustainable Drainage Systems Approving Body under the Floods and Water Management Act 2010 and must approve drainage systems in new developments and re-developments before construction begins

¹⁷⁴ DCLG (2015) Planning Practice Guidance: Flood Zone and Flood Risk Tables, Table 2: Flood Risk Vulnerability Classification

¹⁷⁵ Scott Wilson (2009) Strategic Flood Risk Assessment Level 1: Flood watch areas within Study Area, Figures 7 A & B

CC-D1 FLOOD RISK

- 1. Development proposals will be permitted where they:**
 - a) Are consistent with the sequential test and applicants demonstrate that sites at little or no risk of flooding are developed in preference to areas at higher risk.**
 - b) Do not increase the risk of flooding elsewhere.**
 - c) Do not reduce the potential of land used for current or future flood management.**
 - d) Are compatible with the appropriate Catchment Flood Management Plan or Shoreline Management Plan.**
 - e) Use development to reduce the risk of flooding through location, layout and design and incorporate sustainable drainage systems to minimise surface water run-off and avoid pollution.**
- 2. Where appropriate, a site-specific Flood Risk Assessment should support proposals.**
- 3. Where, as a result of applying the sequential test, a development is approved on an exceptions basis, planning agreements or developer contributions will be sought to ensure that the development is protected from flooding to the appropriate standard throughout its lifetime. Any required additional or enhanced flood defences should not conflict with National Park purposes.**

COASTAL DEVELOPMENT

- 5.29 Exmoor has a wild, undeveloped coast, characterised by high cliffs, headlands and uninterrupted views giving a sense of tranquillity and remoteness. It also has a level of coastal vulnerability associated with it due to the impact of coastal change. The coast is important for its natural beauty, historic assets and supports a range of habitats and species. A significant proportion of the coast has a number of designations including Sites of Special Scientific Interest, Special Areas of Conservation, Heritage Coast and areas identified on the Section 3 Conservation Map. Furthermore the coast is a tourism asset; the South West Coast Path is a national trail which follows the Exmoor coast for part of its length and it makes an important contribution to the local economy. Proposals at the coast will need to be consistent with other policies in this plan which reflect these coastal interests including: GP3 Spatial Strategy, CE-S1 Landscape Character, CE-S3 Biodiversity and Green Infrastructure, CE-S6 Design and Sustainable Construction Principles, CE-S4 Cultural Heritage and Historic Environment, RT-S1 Recreation and Tourism, RT-D12 Access Land and Rights of Way.
- 5.30 Planning at the coast requires a strategic approach due to natural processes acting across regional and local authority boundaries. ENPA will therefore work closely with neighbouring partners to ensure a co-ordinated approach. This includes the Marine Management Organisation, as there is an overlap of jurisdiction with local planning powers extending from the land down to low water mark and marine plans from the sea to the high water mark. The UK Marine Policy Statement¹⁷⁶ (MPS) provides the policy framework for the marine planning system and provides the context for marine plans. Marine plans are intended to put into practice the objectives for the marine environment that are identified in the MPS alongside the NPPF and the Localism Act 2011, with the

¹⁷⁶ HM Government (2011) The UK Marine Policy Statement, London, *The Stationary Office, London*

core aim to achieve sustainable development. They are a key part of achieving the Government's Vision for the marine environment of 'clean, healthy, safe, productive and biologically diverse oceans and seas.' Marine plans are being produced for all the marine plan areas around the coast of England – Exmoor National Park's coastline sits within the South West inshore marine plan area. This has not yet been prepared, but once it has been adopted, ENPA will take account of any policies relevant to the National Park in decision-making. In the absence of marine plans the MPS acts as the relevant marine document which local authorities must take into account. A concordat¹⁷⁷ has been agreed between the main regulatory and advisory bodies and local planning authorities (including National Park Authorities) to provide a framework within which the separate processes for the consenting of coastal developments in England can be better coordinated.

- 5.31 To protect the undeveloped nature of the Exmoor coastline, new development should be located in named settlements¹⁷⁸ unless it can be demonstrated that the proposal is essential in an undeveloped coastal location and is consistent with policy CC-S2.
- 5.32 Development at the coast has the potential to be visually intrusive, for example by affecting the skyline and views along the coast including undeveloped stretches (CE-S1 Landscape Character). Proposals must demonstrate that there will be no adverse impact on the coastline and any coastal issues that may arise will need to be carefully considered including direct, indirect, cumulative, long-term and short-term impacts. Proposals must also demonstrate they are appropriate to the coastal location and that they will not affect natural coastal processes¹⁷⁹ or result in coastal water pollution (CC-S7 Pollution) to the detriment of surrounding areas including those outside the National Park.
- 5.33 The traffic impacts of new development should also be carefully considered as there is a need to minimise the impact of seasonal traffic on narrow roads that lead to the coast particularly around popular destinations such as Porlock and Lynton & Lynmouth.
- 5.34 Improvements to existing sea defence works are not usually subject to planning control although Exmoor National Park would be expected to be consulted on any proposed changes. Planning permission is however required for new sea defence works. As sea defences can have a considerable effect on the coastal environment and natural beauty of the area, good design will be essential to ensure proposals conserve or enhance their surroundings visually.
- 5.35 The risk of coastal change including by flooding means that a precautionary approach should be taken to minimise risk to life and property. Development at the coast should therefore avoid areas known to be at risk of climate change or those areas which are likely to become an area at risk within the lifetime of the development as indicated by the SMP and other evidence. Where development is proposed in a location considered to be at risk of coastal change the applicant must be able to demonstrate that the development will be safe during its lifetime and have accounted for the impacts of flooding, climate change and sea level rise.

¹⁷⁷ DEFRA (2013) A Coastal Concordat for England

¹⁷⁸ Supported by Your Future Exmoor consultation events 2009-2010

¹⁷⁹ DCLG (2012) National Planning Policy Framework (Paragraph 106). Department for Communities and Local Government

CC-S2 COASTAL DEVELOPMENT

- 1. Proposals for development should avoid areas at risk from coastal change, ensure they are compatible with the latest Shoreline Management Plan and available coastal vulnerability data, and where necessary undertake a vulnerability assessment. Development that would increase the risk of coastal erosion will not be permitted.**
- 2. Development will be permitted at the coast only where it has been demonstrated that it:**
 - a) is located in a named settlement (GP3) or requires a coastal location;**
 - b) is not within an area identified at risk of coastal change including Coastal Change Management Areas unless it is essential infrastructure or sea defences which clearly require such a location and there are no alternative solutions;**
 - c) is appropriate to the setting and character of the coastline (CE-S1) and does not adversely affect coastal interests including coastal biodiversity and heritage assets; and**
 - d) does not increase risk to life or property, or affect the natural coastal processes at any part of the coastline both within and outside of the National Park.**

RESPONDING TO COASTAL CHANGE

- 5.36 Coastal change refers to a physical change to the shoreline including permanent inundation, erosion and coastal accretion. This is of particular concern where it is likely to adversely affect existing communities and development. The impacts of climate change leading to sea-level rise and increased storminess are exacerbating coastal change and increase the coastline's vulnerability. Evidence of coastal change within Exmoor National Park includes the 1996 breach of the shingle ridge at Porlock Bay which flooded the low lying freshwater marsh behind. Rapid evolution of the beach and the development of salt marsh followed¹⁸⁰.
- 5.37 The draft North Devon and Somerset SMP2¹⁸¹ provides the long-term plan for the management of the risks associated with coastal processes, and forms an important part of the evidence base for planning in coastal areas. The SMP continues a 'hold the line' policy at Lynmouth, implying that the defences will be maintained and eventually replaced with larger structures to continue to provide protection to Lynmouth. Impacts could include the loss of beach width due to the combination of sea level rise and retention of coastal defence, the potential loss of terrestrial habitat from the Exmoor Coastal Heaths SSSI and Exmoor Heath and Coast SAC. Further impacts could include the loss of or damage to a number of non-designated archaeological features, scheduled monuments and parts of the South West Coast Path.
- 5.38 The SMP includes changes to the coastal policy unit at Porlock Weir from a 'Hold the Line' policy to 'No Active Intervention' commencing from the adoption of the SMP. This implies that assets at Porlock Weir including residential properties, listed buildings and local infrastructure would become at risk of flooding and erosion. To 'hold the line' at

¹⁸⁰ Environment Agency (2004) An evaluation of the breach processes at Porlock shingle ridge

¹⁸¹ North Devon & Somerset Coastal Advisory Group (2010) North Devon & Somerset Shoreline Management Plan Review Final (October 2010) Hartland Point to Anchor Head

Porlock Weir would, in the short term, require existing defences to be replaced with much larger structures to withstand the increased exposure to wave action. This would make it technically and economically difficult to sustain coastal defences here. It is noted in the SMP that it is unlikely that future sea defence provision at Porlock Weir would attract public funds, although there is flexibility for the existing localised defences to be maintained or replaced if alternative funding is made available. However it also questions the sustainability of defences at Porlock Weir because their retention could potentially impact on the wider coastline of Porlock Bay in the long term. Continued defence would only be acceptable if there was limited impact on sediment transport along the coastline. The impact of coastal change at Porlock Weir was further studied by the Somerset Coastal Change Pathfinder project¹⁸², this demonstrated through a visual mapping exercise the possible significant consequences of coastal change at Porlock Weir¹⁸³.

- 5.39 National government promotes the adoption of proactive strategies when responding to coastal change. Any area likely to be affected over the next 100 years by physical changes to the coast (defined primarily from evidence provided by SMPs and other up-to-date material information on coastal change as it becomes available) will be identified as a Coastal Change Management Area (CCMA)¹⁸⁴.
- 5.40 Policy CC-S3 will be applied only to those communities where there is accepted evidence that they are at risk of coastal change. Any proposals for replacement of development through relocation will need to demonstrate that the overall proposal for both new development created and measures for the management of that which is to be lost are consistent with the principles in Policy CC-S3.
- 5.41 Due to the adoption of a 'No Active Intervention' policy for Porlock Weir, and the increased risk of coastal change, a CCMA has been designated for Porlock Weir (as shown in Map 5.1 and on the Policies map), in consultation with relevant bodies including the Environment Agency and Porlock Manor Estate. Within the CCMA Policies CC-S3 and CC-S4 will be followed to:
- a) be clear as to what development will be appropriate in such areas and in what circumstances; and
 - b) make provision for development and infrastructure that needs to be relocated away from CCMA¹⁸⁵.
- 5.42 The designation of the CCMA provides the mechanism for areas at risk, such as Porlock Weir, to respond to climate change. Within the CCMA, no new dwellings will be permitted as this would increase the number of people at risk from flooding and coastal change. Some developments may be permitted where these contribute to sustainable development and are important to the economic and social well-being of the local community, and are less vulnerable or water compatible in flood risk terms¹⁸⁶, such as change of use to tourism-related development (excluding holiday accommodation), shops, small scale business or leisure activities requiring a coastal location¹⁸⁷. Key community infrastructure such as flood and coastal erosion risk management options or

¹⁸² DEFRA funded from 2009-2011. The project had the aim of assisting those coastal communities most at risk from sea level rise to help them adapt to projected changes at the coast. Project outputs included the development of a scenario for Porlock Weir following a major storm event

¹⁸³ Somerset Coastal Change Pathfinder Project (2011) Porlock Weir

¹⁸⁴ DCLG (2012) National Planning Policy Framework (Paragraph 106). Department of Communities and Local Government

¹⁸⁵ Ibid

¹⁸⁶ DCLG (2014) Planning Practice Guidance: Flood Zone and Flood Risk Tables, Table 2: Flood Risk Vulnerability Classification. Paragraph: 066 Reference ID: 7-066-20140306

¹⁸⁷ DCLG (2014) Planning Policy Guidance: Coastal Change Management Areas. Paragraph: 071 Reference ID: 7-071-20140306

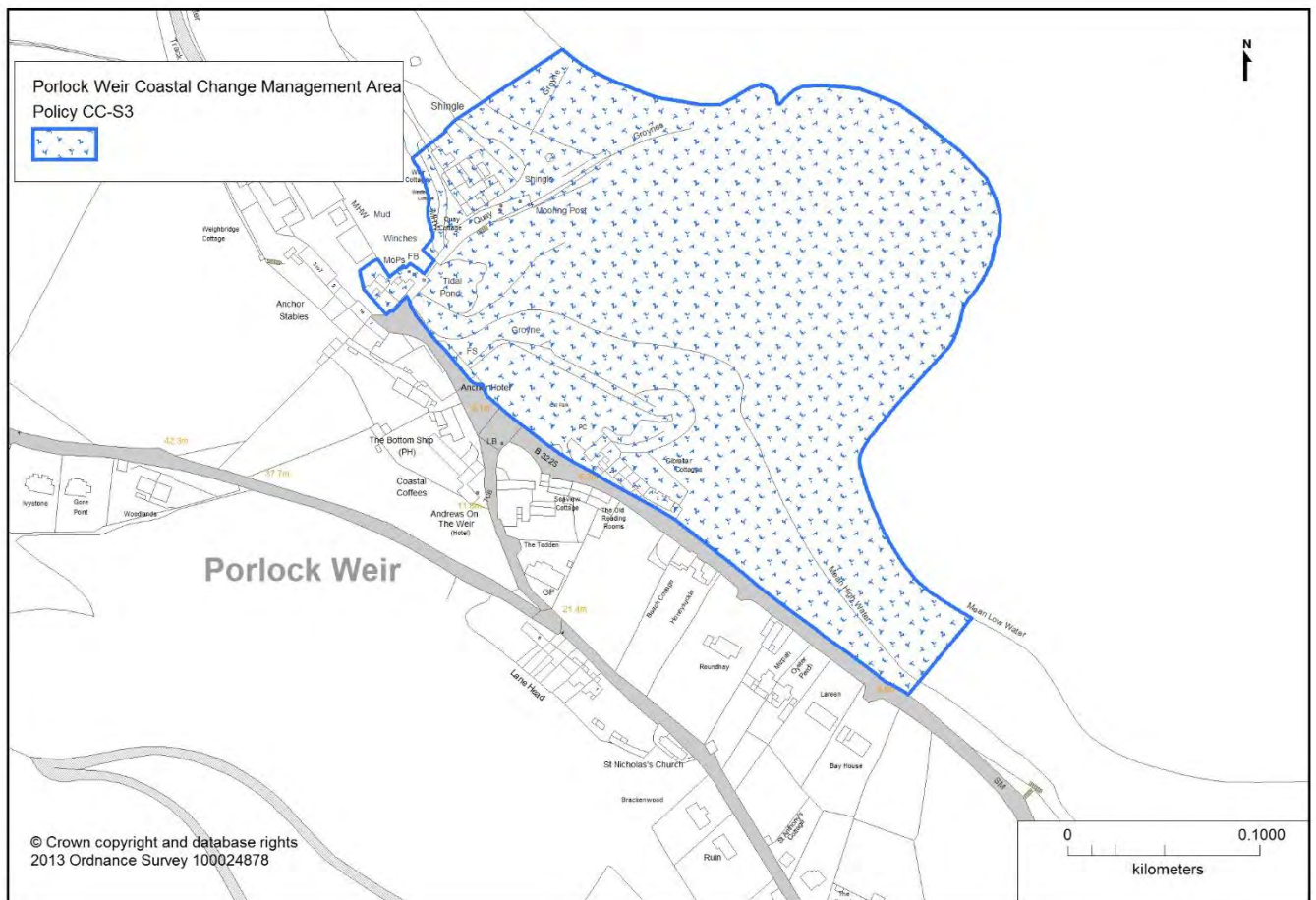
changes to the car park and toilets would be allowed where this has to be sited within the CCMA to provide the intended benefits to the wider community and there are clear, costed plans to manage the impact of coastal change on it and the service it provides. Any development permitted will be subject to time-limited planning permissions. The provision of affordable housing within other parts of Porlock Weir outside the CCMA will be considered in accordance with GP4 and relevant housing policies. Proposals for business development within other parts of Porlock Weir outside the CCMA will be considered in accordance with SE-S2 Business Development in Settlements. Porlock Weir lies within the ecological zone of influence of the barbastelle bat feature of the Exmoor and Quantocks Oakwoods SAC (CC-S3). These are generally foraging habitats which vary through the seasons. Development proposals should therefore ensure that barbastelle bat habitat is maintained so there is no net loss of habitat as a result of development.

- 5.43 It is envisaged that a strategy for Porlock Weir and surrounding area will be produced to manage the overall sustainability of the community likely to be affected by physical changes at the coast. The strategy will set out how development at risk from coastal change can be relocated away from the CCMA. The relocation of development at risk to 'safer' areas could be achieved in a number of different ways, including the relocation further inland or to neighbouring settlements. Any proposals for adaptation and relocation at Porlock Weir should accord with this strategy.

CC-S3 PORLOCK WEIR COASTAL CHANGE MANAGEMENT AREA

- 1. A Coastal Change Management Area (CCMA) is designated at Porlock Weir as shown on the policies map.**
- 2. Within the Porlock Weir CCMA:**
 - a) Permanent new residential development will not be permitted.**
 - b) Change of use will be permitted for less vulnerable and water compatible tourism-related development, shops, small scale business or leisure activities requiring a coastal location and providing substantial economic and social benefits to the community.**
 - c) Key community infrastructure will be permitted, which has to be sited within the CCMA to provide the intended benefits to the wider community and there are clear, costed plans to manage the impact of coastal change on it and the service it provides.**
 - d) Adaption measures to existing buildings and businesses, which increase resilience to flood risk will be supported.**
 - e) Barbastelle bat habitat will be maintained so that there is no net loss from development.**
- 3. Any development permitted under (2) above will be subject to time-limited planning permissions.**
- 4. Replacement of buildings and facilities likely to be lost as a result of coastal change will be permitted in accordance with policy CC-S4 replacement dwellings from CCMA's.**
- 5. A strategy for Porlock Weir and surrounding area will be produced in line with the principles in (2) above and CC-S4 replacement dwellings from CCMA's. Any proposal for adaptation and relocation at Porlock Weir will be required to be achieved in accordance with this strategy.**

Map 5.1 Porlock Weir Coastal Change Management Area



- 5.44 Where the replacement of development from the CCMA through relocation is proposed, the replacement of dwellings will be given priority as these are within the highest vulnerability category and pose greatest risk to life. Replacement of facilities, such as car park and toilets will be considered where this can be achieved without detriment to the landscape and historic character of the settlement. For other buildings at risk, such as the hotel, pub, shops and cafes, where replacement may not be viable within the settlement, adaptation measures will be supported to increase resilience to flooding.
- 5.45 Proposals to relocate development being displaced as a result of coastal change should be able to demonstrate the reasons for the choice of location for any relocated development including local socio-economic links between the relocated development and the community from which the development was displaced. Proposals for the replacement of facilities, such as car parks, should investigate alternative options including a shuttle service from Porlock for visitors. Any new dwellings or other development intended to replace that threatened by coastal erosion should be located in accordance with the spatial strategy (GP3). Time limited conditions will be used to enable flexibility in replacement through relocation. ENPA will work with partners to consider the full range of options based on sound evidence for a community 'at risk' to find the most appropriate solution for it, which will include the impact on the natural, cultural and built environment.
- 5.46 Future arrangements should be made for the buildings to be replaced to ensure they are rendered safe, either through clearance or 'managed,' which may include a temporary and alternative use of the site. Where permission is granted, a planning obligation will be secured to ensure the satisfactory management of the development which is to be lost. The co-ordination of the development which is to be lost and the new

replacement development may be managed through a legal agreement. Proposals for the relocation of an existing dwelling should apply the same principles as those in HC-D17 Replacement Dwellings in respect of floorspace and reflect the scale of the original building it is replacing. Development should also be of a character and quality commensurate with its location in a National Park and should be well integrated within its locality, ensuring the place will function well (CE-S6 Design and Sustainable Construction Principles). Proposals for relocation may provide an opportunity for the enhancement of the National Park; this should be consistent with policy GP1 Achieving National Park Purposes and Sustainable Development.

CC-S4 REPLACEMENT DEVELOPMENT FROM COASTAL CHANGE MANAGEMENT AREAS

- 1. The replacement of development within CCMA at risk from coastal change through relocation must be consistent with the following principles:**
 - a) it is important to the well-being of the coastal community affected;**
 - b) it is not within an area likely to be affected by physical changes to the coast;**
 - c) it is well-related to current buildings and infrastructure including in its siting, scale, height and design (CE-S6);**
 - d) replacement development is of the same size and use as the original asset at risk unless an opportunity for significant visual enhancement can be demonstrated in accordance with GP1. In the case of dwellings, they accord with the floorspace provision in HC-D17;**
 - e) the site of the original development at risk it replaces is either cleared or managed to be rendered safe for the local community, environment and consistent with National Park purposes; and**
 - f) the overall proposal considering both new development and management of that which is to be lost will result in no unacceptable impact on the landscape, biodiversity (including habitats used by barbastelle bats), built environment, townscape or local communities.**

WATER CONSERVATION

5.47 The National Park is an important source of water for communities both within and outside the National Park. The catchments on Exmoor supply drinking water to over half a million people including in Tiverton, Exeter and Taunton. The implications of growth in settlements outside the National Park for water conservation on Exmoor will need to be assessed as part of adjacent Authorities' Local Plan appraisals. Its popularity as a tourist destination, along with many other parts of the South West, also increases demand for water supplies, particularly during the summer months. Water resources are important for the local economy and businesses, particularly agriculture. Careful management and protection of these water catchments is important to ensure that their ability to provide ecosystem services including capturing and storing rainfall, managing flood risk, water re-cycling, the supply of clean, fresh water, and support for wildlife habitats and species are not compromised. Monitoring programmes are required by the EU Water Framework Directive (WFD) to establish an overview of the water status in each river basin district. WFD assessments by the Environment Agency have generally found rivers and streams on Exmoor to be in 'good' ecological status.

- 5.48 Water is supplied primarily from Roadford and Wimbleball reservoirs, other smaller reservoirs, a number of rivers and their tributaries and numerous groundwater resources. They are administered by South West Water and Wessex Water. Wessex Water covers parts of the eastern side of the National Park. Groundwater is an important component of water resource availability for Wessex Water, although supplies are also drawn from Wimbleball reservoir and a number of rivers and tributaries. Assessment of water requirements and likely supplies in this part of the Park over the period of the Plan (including climate change implications) has identified that there is sufficient water to meet demands, provided action is taken to improve water conservation (along with other actions for the water company including reducing leakage). This area is considered to be in low risk of water stress¹⁸⁸.
- 5.49 South West Water covers parts of the western side of the National Park. The key resources that are available include Roadford and Wimbleball reservoirs, the River Exe and its tributary the Barle, which are used to recharge Wimbleball reservoir, and a number of groundwater resources. Assessment of water requirements and likely supplies in this part of the Park over the period of the Plan has identified that sufficient water can be provided to meet demands, provided measures to improve demand management and leakage control are undertaken and there is further investment in water supply infrastructure (outside the National Park), although rising population numbers in large settlements outside the National Park are likely to put increasing pressure on water resources. This area is considered to be in moderate risk of water stress¹⁸⁹. There are no plans to invest in additional water supply infrastructure within the National Park during the Plan period¹⁹⁰.
- 5.50 In some cases, in more remote areas, there may be private water supplied from sources such as springs, wells and boreholes where access to public water supply is too expensive to connect due to distance. These supplies can be sourced from the more shallow aquifers, making them more prone to water scarcity during periods of extreme dry weather. It is therefore important that any proposals for new development¹⁹¹ on a private water supply are able to demonstrate that sufficient water supplies are available, and that existing water supplies and the environment are not adversely affected by the additional demand for water.
- 5.51 As well as providing water for public drinking supplies, water is essential to Exmoor's landscapes and wildlife, and it is vital to the livelihoods of those who live and work here particularly for agriculture and other non-domestic uses. Water is highly relevant to conservation of biodiversity¹⁹² both in terms of the quality and quantity of water that is available to support the survival of water dependent species and wetland habitats. A number of rivers and wetland sites are designated on Exmoor and are dependent upon there being appropriate water quality to support the habitats and species for which they were designated (CE-S3 Biodiversity and Green Infrastructure). Water supplies are also required to provide a sufficient base flow for rivers to maintain fish stocks and other aquatic species, and to dilute any pollution and sewage (CC-S7 Pollution).
- 5.52 The Government is committed to protecting water ecosystems to achieve good ecological status through a river basin planning approach, under the WFD. The Directive is a key policy driver and requires the protection, improvement and sustainable use of freshwater systems and coastal waters and sets a timetable to reach good chemical and ecological status for inland and coastal waters. To meet WFD

¹⁸⁸ Wessex Water (2014) Final Water Resources Management Plan

¹⁸⁹ South West Water (2014) Water Resources Management Plan

¹⁹⁰ ENPA (2015) Infrastructure Delivery Plan

¹⁹¹ This applies to water supplies for drinking, washing and cooking or used in businesses (dwellings and commercial premises such as holiday accommodation, restaurants and so on)

¹⁹² DEFRA (2011) Biodiversity 2020 – A Strategy for England's Wildlife and Ecosystem Services

objectives the Environment Agency has produced a series of River Basin Management Plans (RBMPs) that set out a programme of measures for protecting and improving the water environment. This includes a River Basin Management Plan (RBMP) for the South West River Basin District – which includes the river catchment areas on Exmoor. The South West RBMP encourages sustainable water management, such as water efficiency measures, by builders and developers, and promotes the use of sustainable drainage systems in new developments as well as retrofitting where appropriate.

- 5.53 Demand for water resources in the future is expected to increase with a growing population, particularly in communities outside the National Park who are serviced by water arising on Exmoor. Climate change and the associated warmer, drier, summers are likely to affect the availability of resources including reduced flows in rivers, reductions in the recharge of aquifers and a consequent lowering of groundwater levels¹⁹³ and Water Resource Management Plans have tried to take into account the implications in the assessment of long term water availability. Increased frequency of extreme weather events may also affect both water supplies and the risk of flooding (CC-D1). There may also be other effects on the water environment, such as increased water temperatures, which will also impact on aquatic species and habitats. These potential effects would be exacerbated by likely increases in the demand for water from households and industry. Additional measures for storing and conserving water resources, for example, through rainwater harvesting or small scale farm water storage including reservoirs, bunds and ponds may be required in future¹⁹⁴.
- 5.54 The emphasis is therefore on conserving water resources on Exmoor including maintaining river flows at periods of low rainfall, and managing water on a catchment basis. Development should not have a detrimental impact on the water environment and should incorporate measures to support water efficiency and re-use (see policy CE-S6 Design and Sustainable Construction Principles). This could include minimising demand, recycling and storing water, and retrofit where appropriate. Retrofitting on listed buildings would require listed building consent, and on traditional buildings would need to not cause harm to the historic fabric of the building (CE-S5 Principles for the Conversion or Structural Alteration of Existing Buildings).

CC-D2 WATER CONSERVATION

- 1. Development proposals should demonstrate how water conservation measures will be incorporated in their proposals and how demand for water will be minimised, including measures for the recycling, storage and reuse of rainwater and greywater. Retrofitting of existing properties will also be encouraged where appropriate.**
- 2. On-farm water storage through small scale reservoirs, bunds and ponds will be supported where they enhance water supplies and are compatible with National Park purposes.**
- 3. Development proposals which lead to an increase in the demand for water in locations where the existing water supply is inadequate or cannot be satisfactorily improved, or where additional abstraction will have an adverse effect on existing supplies, fisheries, recreational or nature conservation interests will not be supported.**

¹⁹³ Environment Agency (2008) Water resources in England and Wales - current state and future pressures.

¹⁹⁴ DEFRA (2011) Water for Life

LOW CARBON AND RENEWABLE ENERGY DEVELOPMENT

CONTEXT

- 5.55 The Government has set a UK target to deliver 15% of the UK's energy consumption from renewable sources by 2020, and also has an ambition that by 2020, 12% of heating should come from renewable sources.
- 5.56 The National Planning Policy Framework places the responsibility on all communities to contribute to energy generation from renewable or low carbon sources. Renewable and low carbon energy development should be encouraged, while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts. Community-led initiatives are also encouraged for renewable and low carbon energy, including developments outside such areas being taken forward through neighbourhood planning.
- 5.57 The Government's Vision¹⁹⁵ for National Parks particularly highlights the National Park Authorities' role as exemplars of sustainability in responding to climate change, including promoting energy efficiency and the generation of renewable energy, whilst not compromising their overriding duty under the 1949 Act. It recognises that the National Parks offer important opportunities for a range of renewable energy technologies, including biomass (woodfuels), micro-hydro, anaerobic digestion (which will also reduce waste), wind and solar power installations, appropriate to the national value of the landscape.
- 5.58 The use of energy accounts for about 18% of Exmoor's carbon footprint. The greatest demand for energy is from domestic heating, which is currently provided through a combination of oil, cylinder gas, coal, electricity, woodfuel and a small amount of mains gas. As a consequence, domestic heating also accounts for around two-thirds of emissions arising from energy use. The remaining emissions related to energy are from electricity for homes, heating for businesses, and electricity for businesses¹⁹⁶.
- 5.59 The National Park Authority has encouraged the use of renewable technologies through the Carbon Neutral Exmoor programme. In appropriate circumstances small scale renewable energy schemes utilising technologies such as solar panels, biomass heating, small scale wind turbines, photovoltaic cells and combined heat and power schemes can be incorporated both into new developments and some existing buildings – this is supported in appropriate circumstances through policy CE-S6 (Design and Sustainable Construction Principles).
- 5.60 The Renewable Energy Resource Assessment¹⁹⁷ for Exmoor National Park identifies the potential for a range of technologies across Exmoor. This highlights in particular the opportunities from biomass due to the availability of woodfuel and other crops within the National Park. Hydropower is another potential source within the National Park, although not all water courses may be suitable and other interests will need to be taken into account. Solar heat and electricity (PV) have become more widespread (particularly following Government incentives and reductions in cost), and probably to a lesser degree, ground and air source heat pumps. The wind resource is good, however potential in Exmoor is likely to be limited by the need to site turbines in locations sympathetic to the natural beauty, wildlife and cultural heritage of the National Park. Energy from waste technologies could provide a sustainable way of managing residual municipal waste and agricultural wastes providing travel distances are minimised. Tidal stream and wave energy are developing technologies that are not currently commercially viable, but could become so over the Plan period. Any such proposals will

¹⁹⁵ DEFRA (2010) English National Parks and the Broads UK Government Vision and Circular

¹⁹⁶ ENPA (2010) Exmoor Carbon Neutral Programme Consultation, *Exmoor National Park Authority, Dulverton*

¹⁹⁷ ENPA (2008) Renewable Energy Resource Assessment. *Exmoor National Park Authority, Dulverton*

be considered by the relevant authorities in accordance with the Coastal Concordat¹⁹⁸, Marine Planning Statement¹⁹⁹, and any adopted Marine Plan for the South West inshore area. ENPA will liaise with the Marine Management Organisation and other relevant authorities in relation to the development of any associated on-shore infrastructure. Proposals for renewable energy technologies would need to consider the implications of flood risk (CC-D1) and coastal change (CC-S2).

RENEWABLE ENERGY

- 5.61 Not all renewable energy technologies will require planning permission. However the National Park Authority encourages applicants to consider the full range of technologies available and to discuss proposals with the Local Planning Authority at an early stage. The Environment Agency regulates and permits many types of renewable energy schemes, and early consultation with them is also encouraged. Applicants will be expected to demonstrate that they have undertaken measures to reduce the need for energy and improve energy efficiency before considering renewable energy and the type of renewable energy technology to be used. This is to ensure that they are consistent with the National Parks Vision and Circular that in National Parks renewable energy generation is appropriate to the national value of the landscape²⁰⁰.
- 5.62 The National Park Authority is supportive in principle of small-scale renewable energy developments which contribute towards meeting domestic, community or business energy needs within the National Park, provided that there is no significant environmental harm to the area concerned or the National Park as a whole. For the purposes of this policy, 'small-scale' is defined as schemes of a scale that can be carried out within the capacity of the local environment and consistent with its landscape character, without causing damage to its natural beauty, cultural heritage, wildlife, or eroding enjoyment of the special qualities of an area, in accordance with statutory purposes and national policy²⁰¹. This will include cumulative impacts when considered in combination with any existing schemes within the National Park or affecting its setting. Where the impacts are acceptable, small scale renewable energy schemes that provide community benefits or environmental enhancement will be particularly supported. Large and medium scale renewable energy projects will not be acceptable within Exmoor. Nationally significant energy infrastructure projects²⁰² will be determined by the Secretary of State.
- 5.63 Planning permission for renewable energy developments likely to have an adverse effect on a site with internationally or nationally recognised designations (Special Areas of Conservation, Sites of Special Scientific Interest, National Nature Reserves, Scheduled Monuments, Conservation Areas, Listed Buildings, and Registered Parks and Gardens identified on the Policies Map) will not be granted, unless an assessment has shown that the objectives of designation of the area will not be compromised by the development, and any significant adverse effects on the qualities for which the area has been designated have been mitigated and are clearly outweighed by the environmental, social and economic benefits. Impacts on Local Wildlife Sites and other areas of nature conservation or heritage interest will also be subject to a similar assessment.
- 5.64 Where necessary, landscape sensitivity and capacity analysis, ecological or historic environment/ archaeological surveys or other investigations deemed necessary by the National Park Authority should be carried out to inform the application. Environmental Impact Assessment (EIA) will be required for certain renewable energy projects where

¹⁹⁸ DEFRA (2013) A Coastal Concordat for England

¹⁹⁹ HM Government, *et al.* (2011) UK Marine Policy Statement (section 3.3.). *The Stationery Office, London*

²⁰⁰ DEFRA (2010) English National Parks and the Broads UK Government Vision and Circular (Paragraph 47)

²⁰¹ DCLG (2012) National Planning Policy Framework (Paragraph 14; footnote 9). Department of Communities and Local Government

²⁰² Defined in the Overarching National Policy Statement for Energy Infrastructure as Onshore wind or biomass schemes generating more than 50 megawatts and offshore wind schemes over 100 megawatts

the development falls into a category within Schedule 2(3) of the Regulations²⁰³ and the National Park Authority adopts a 'screening opinion' that EIA is required.

ISSUES TO BE CONSIDERED IN PROPOSALS FOR RENEWABLE ENERGY DEVELOPMENT

- 5.65 There are many different types of renewable energy technologies, and some are more compatible to National Park purposes than others. Applicants are therefore encouraged to consider the range of technologies available at an early stage, and to discuss proposals with officers so that appropriate schemes can be supported. Proposals should clearly set out the benefits arising from the development including, for example, reductions in emissions, environmental enhancements, community or social benefits, and economic benefits such as job creation and retention. However, care must also be taken in the detailed design of any proposal to minimise potential adverse impacts, both during construction and operation. Applications should assess the impacts of the proposed scheme along with any required infrastructure such as buildings, tracks, overhead cables or pipelines. The impacts will vary according to the type of scheme proposed, and the level of assessments and information required should be proportionate to the scale of the proposal and its likely impact. Further details are given below.
- 5.66 Planning conditions may be used to ensure that any residual impacts of approved schemes are acceptable, to require removal of approved structures if they become redundant, and restoration of the site.

LANDSCAPE AND VISUAL IMPACT

- 5.67 The potential landscape and visual effects of particular renewable energy developments will vary on a case by case basis according to the type of development, its location and the landscape setting and sensitivity of the proposed development. Landscape sensitivity is the degree to which a particular landscape character type or area can accommodate change without unacceptable detrimental effects on character.
- 5.68 The effects of renewable energy schemes on landscape can include:
- a) direct impacts on landscape fabric (for example loss of a hedge or other feature);
 - b) impacts on landscape and seascape character, including effects on the distinct pattern of elements of the landscape such as scale, landform, vegetation patterns, historic and cultural features; and / or
 - c) impacts on the perceptual characteristics of landscape – including feelings of openness, remoteness, tranquillity, and beauty.
- 5.69 The visual impacts of renewable energy schemes will depend on where they can be seen from and who will see them. Landform is a fundamental issue for Exmoor, particularly moorland landscapes which have a horizontal emphasis of ridges, plateaux, and smooth horizons. As with landscape character, the significance of visual impacts will vary according to the sensitivity of the receptor environment, and the magnitude of change, for example a scheme in a remote moorland area, or within the undeveloped coast, with open views and few visible human artefacts would be more sensitive to visually intrusive vertical elements, such as wind turbines, than areas with more existing activity and structures.
- 5.70 Some of these effects may be minimised through appropriate siting, design (including material specification and colour) and landscaping schemes, depending on the size and type of development proposed. For example, visibility of wind turbines from valleys can be decreased if the siting of turbines avoids blades breaking the skyline from important or sensitive viewpoints. The most quiet, scenic and tranquil areas should be avoided, as

²⁰³ HM Government (2011) Statutory Instrument 2011 No.1824 – The Town and country Planning (Environmental Impact Assessment) Regulations 2011

should any visual competition with historic features such as church towers, historic settlements, or other landmarks. Grouping any necessary structures with existing buildings, trees or landform can help visual integration, and for smaller schemes screening may be possible. The design of structures is also important, and traditional materials and form should be used where possible. The colour of wind turbines can also help to reduce visual impacts.

- 5.71 The cumulative impacts of a number of structures associated with the scheme and with other existing renewable energy schemes within the locality or visible from it should also be considered. Cumulative landscape effects and visual effects should be considered separately. The former refers to the effects of a proposal development on the landscape fabric, character and quality and so concerns the degree to which renewable energy development becomes a significant or defining characteristic of the landscape. Cumulative visual effects concern the degree to which renewable energy development becomes a feature in particular views (or sequences of views), and the effect this has upon the people experiencing those views.
- 5.72 Applicants should consider issues of landscape and visual impact and demonstrate that any impacts can be avoided, minimised or mitigated such that the proposals will not detract from the natural beauty of the National Park. Further guidance on assessing landscape impacts should be considered²⁰⁴.

WILDLIFE

- 5.73 The impact of renewable energy schemes on the local ecology should be carefully assessed and where possible, result in an overall benefit for wildlife. The potential impacts depend on the type of technology and its location. Wind turbines may have direct impacts on habitats in relation to their siting and any access tracks required, and also potential impacts on species particularly birds and bats which can be struck by the moving blades. Care is needed to ensure that turbines are not located on migratory routes or on commuting routes between roosts and foraging areas for example. Hydro schemes also have potential ecological impacts through disturbance to the river bed and bank; impact on the watercourse as a habitat for fish and other aquatic creatures including through water abstraction; and impact on ecological value of other land affected by the development. The demand for woodfuel for biomass could also lead to the loss of deadwood habitats if wood is cleared from the forest floor. Domestic renewable energy schemes such as PV panels also need to ensure that there is no disturbance during installation or maintenance to species such as bats or barn owls which may be using the roof space. There is also emerging evidence that the reflection of polarised light from solar panels can be damaging to aquatic insects²⁰⁵. Such impacts will need to be judged on a case by case basis and will need to be kept under review.
- 5.74 Whilst negative impacts need to be avoided or minimised, there are also potential wildlife benefits that can be gained from renewable energy schemes. For example careful management of woodlands for woodfuel could enhance biodiversity; energy crops can provide cover and potentially over-wintering sites for birds and other species; and water management for hydro could benefit aquatic species, for example some turbine types oxygenate the water which can benefit fish.

CULTURAL HERITAGE AND HISTORIC ENVIRONMENT

- 5.75 The impacts on cultural heritage and the historic environment should be assessed including impacts on heritage assets such as historic landscapes, listed buildings and Conservation Areas or their settings. Renewable heat systems, such as solar panels or

²⁰⁴Devon Landscape Policy Group (2013) Advice Note 2: Accommodating Wind and Solar PV Developments in Devon's Landscape: Guidance on minimising harm to the distinctive character and special qualities of Devon's landscape through sensitive siting and design, *Land Use Consultants*,

²⁰⁵ Buglife (2011) A Review of the Impact of Artificial Light on Invertebrates

biomass boilers, could affect historic buildings and although these might not require planning permission, they may require listed building consent. Visualisations may be required to demonstrate the effects of a proposed wind turbine on historic landscapes or the setting of heritage assets. Hydro schemes may utilise existing buildings and the impact on any historic interest will need to be carefully assessed. The risk of potential damage to archaeology particularly during construction should also be assessed.

- 5.76 Potential schemes should include an assessment of the implications for archaeological remains, historic buildings and designed landscapes, as well as the historic character and associations of the wider landscape. Such assessments should embrace both the direct physical effects of projects and any indirect impacts, such as hydrological impacts in surrounding areas.

TRANQUILLITY, NOISE AND SHADOW FLICKER

- 5.77 Tranquillity is one of the special qualities of the National Park that is valued by people and any potential impacts on tranquillity from renewable energy schemes, including noise or shadow flicker from wind turbines, would need to be minimised to a level which would not adversely affect people's enjoyment of the National Park. There may also be impacts on residential properties, particularly where schemes are located close to existing dwellings or buildings in order to minimise visual impact. Air source heat pumps can potentially cause noise disturbance to neighbouring properties. Noise from traffic and plant operations will need to be carefully considered, particularly in relation to biomass and anaerobic digestion plants according to likely levels of traffic to and from the site in order to transport biomass fuel and subsequent by-products.

- 5.78 A specific issue in relation to wind turbines is shadow flicker, where the shadow of the rotating blades falls across a dwelling and can cause light within the dwelling to brighten and darken. Government guidance²⁰⁶ states that impacts are only likely to occur when the property is located within 130 degrees either side of north of a turbine, and that shadow flicker decreases with distance from the turbine, with a general guide of more than 10 rotor diameters from the turbine being seen as acceptable. However this may conflict with locating turbines close to existing buildings, in order to reduce visual impact, and so will need to be considered in combination with other objectives. Noise from wind or hydro turbines must also be assessed according to the latest standards. Applicants should provide information on the assessment of noise, vibration and shadow flicker impacts, including noise associated with the construction, operation and (if relevant) decommissioning of the scheme. Noise limits may need to be set using planning conditions to protect general amenity and any nearby residential properties.

AIR AND WATER QUALITY, DUST, ODOUR

- 5.79 Air and water quality in the National Park are generally good, and any potential impacts from renewable energy schemes will need to be carefully considered.
- 5.80 Potential impacts on air quality can arise from the dust generated by biomass plants, particularly when large quantities of materials are required. The efficient burning of modern biomass boilers could however help to improve air quality, particularly in comparison to conventional oil or coal fuelled boilers. However, biomass plants over 50kW may pose risks from emissions of fine particulates (PM₁₀) and nitrogen dioxide (NO₂) which can affect health. These may also lead to landscape and visual impacts due to the design and height of the stack. Applications for biomass plants over 50kW should demonstrate that predicted emission concentrations associated with the stack height do not have a significant impact on air quality objectives for NO₂ and PM₁₀, or landscape character.

²⁰⁶ Parsons Brinckerhoff (2011) Update of UK Shadow Flicker Evidence Base

- 5.81 Anaerobic digestion plants are, by their nature, odorous. Proposals should examine predicted odour effects and, if necessary, include mitigating measures, such as odour control systems. However, anaerobic digestion plants also provide opportunities to deal with farm wastes, such as slurry, which otherwise may form a potential pollution hazard.
- 5.82 The growing of biomass crops, such as miscanthus, could impact on water quality from the use of chemical fertilizers and pesticides, although generally such crops are low input, and once established, reductions in soil disturbance and erosion can also be achieved compared with conventional arable crops, thereby potentially improving water quality by reducing runoff and sedimentation²⁰⁷.
- 5.83 The impact of hydro schemes on water quality and resources will need careful assessment, particularly during any required engineering or construction works and once the scheme is operational.

RECREATION AND ACCESS

- 5.84 Tourism and recreation are important to the National Park, and one of the primary purposes of the National Park is to promote understanding and enjoyment of its special qualities. Any potential impacts on recreation and access should be considered. These could include disruption to public rights of way or access, or impacts on important views due to siting of a wind turbine for example, or disruption to riverbank access from a hydro scheme.
- 5.85 Applicants will also be expected to provide information on access requirements for the scheme and any potential impacts arising. This includes access for construction and maintenance. The landscape and visual impacts of any access tracks will need to be considered in particular, as well as any associated impacts on wildlife or cultural heritage.

TRANSPORT AND TRAFFIC

- 5.86 Transport of equipment to the site will need to be considered, for example the construction of wind turbines will require sufficient access for long and wide load items. The weight of individual components could also be an issue, and it is important that all sections of roads and bridges on the proposed delivery route can accommodate the size and weight of the loads.
- 5.87 Some renewable energy technologies may require regular transport movements, for example deliveries of biomass, or additional feedstock for anaerobic digesters. The impacts on rural roads, settlements and the tranquillity of the National Park will need to be considered.

GRID CONNECTION

- 5.88 The impacts of grid connection either by overhead cables or underground pipelines are important considerations, as they can have significant impacts on landscape, ecology and the historic environment. Policy AC-D6 (Fixed Line Transmission Infrastructure) requires that new connections are underground.
- 5.89 Most micro-generation technologies can either operate connected to a national or local grid or as stand-alone systems that power buildings directly or feed into an energy store, such as a battery. Micro-generation is particularly suited to rural locations where mains connectivity may not be available.

ENVIRONMENTAL ENHANCEMENT OR COMMUNITY BENEFITS

- 5.90 Whilst the potential impacts of renewable energy schemes need to be carefully considered, there may also be opportunities to provide environmental enhancement or community benefits, and applicants should include details of any such benefits in their

²⁰⁷ DEFRA (2007) Planting & Growing Miscanthus: Best practice guidance

proposals. This will include any carbon savings that will be achieved and reductions in greenhouse gas emissions.

- 5.91 Other environmental enhancement could include wildlife benefits from increased management of woodland and hedgerows for biomass. Low tech anaerobic digesters can be beneficial in reducing potential pollution hazards, and also assist in meeting the requirements of Nitrate Pollution Prevention Regulations²⁰⁸ and extension of Nitrogen Vulnerable Zones.
- 5.92 There could also be some benefits from a shift to renewable heating systems, particularly as the majority of communities are not on mains gas, and there are consequently high levels of solid fuel boilers (oil and coal in particular). The volatile price of oil and concerns over future security of supply, mean that a local, renewable source of fuel could greatly benefit communities. The potential for communities to benefit from deploying and owning renewable energy generation capacity is of great interest; it offers an opportunity to engage communities in responding to climate change and for them to realise an income stream which could be used to fund local projects of their choice, helping to empower and build more cohesive communities in Exmoor.
- 5.93 Local communities may also benefit from the expansion of renewable energy technologies across Exmoor, including jobs for suppliers and contractors in installing and maintaining systems.

REMOVAL OF REDUNDANT FACILITIES AND REINSTATEMENT OF SITE

- 5.94 Where new structures are proposed, applications should make provision for the removal of these structures, and reinstatement of the site including opportunities for enhancement, should the renewable energy scheme cease to be operational.

CC-S5 LOW CARBON AND RENEWABLE ENERGY DEVELOPMENT

- 1. Development proposals for small scale renewable energy schemes that assist in contributing towards reducing greenhouse gas emissions and moving towards a carbon neutral National Park will be supported where they:**
 - a) contribute towards meeting domestic, community or business energy needs within the National Park;**
 - b) are compatible with the landscape and seascape character of the locality and avoid the most sensitive landscapes;**
 - c) do not compromise the natural beauty, wildlife, cultural heritage or historic environment of the National Park, or lessen the enjoyment of its special qualities, either on their own, or in a combination with other schemes;**
 - d) do not adversely affect habitat quality or the maintenance of wildlife populations;**
 - e) provide environmental enhancement or community benefits wherever possible;**
 - f) conserve the amenity of the area including in relation to landscape and visual impact, tranquillity, access and recreation, air and water quality, noise, dust, odour and traffic generation; and**
 - g) make provision for the removal of the facilities and reinstatement of the site, should it cease to be operational.**
- 2. Proposals for large scale, commercial renewable energy development will not be permitted.**

²⁰⁸ Nitrate Pollution Prevention Regulations (NPPR) (2008)

SMALL SCALE WIND TURBINES

- 5.95 Whilst the National Park Authority is supportive of renewable energy, wind turbines are, by their very nature, often intrusive in the landscape. The Exmoor National Park Landscape Character Assessment (LCA) identified intrusive development as one of the main threats to landscape character. The LCA recognises that Exmoor National Park *“is small in extent and as such is fragile in relation to change – not least small cumulative issues that, collectively, can have a significant impact on the landscape”*. The Exmoor National Park Partnership Plan 2012-17²⁰⁹ recognises that wind turbines can, individually and cumulatively, erode the unspoilt, uncluttered nature of the landscape and they can have a detrimental impact on tranquillity²¹⁰. The potential for exploiting the wind resource in Exmoor is therefore likely to be limited by the need to ensure that turbines do not detract from the statutory purposes to conserve the natural beauty, wildlife and cultural heritage of the National Park. Some landscapes, such as moor and heath, including in coastal locations, are so sensitive to intrusive development from vertical structures due to their open vistas and wild character, that it may not be acceptable to have any turbines. However, in other landscape types in the National Park, it may be possible for individual small scale wind turbines that are similar in scale to existing buildings and trees, against a backdrop or suitably screened and in an appropriate colour, to be assimilated into the landscape.
- 5.96 Consistent with the need to conserve and enhance the National Park’s natural beauty, turbines should generally be in the range of 10m to 15m in height to rotor tip. Occasionally, wind turbines up to a maximum of 20m height (to rotor tip) may be capable of being accommodated within the National Park given careful consideration of any potential impacts on National Park purposes. This maximum height reflects experience in assessing the impacts of wind turbine proposals some of which have approached 20m to the rotor tip. Turbines of this height have only been judged to be acceptable where the landscape is considered to be sufficiently robust, for example, where existing vertical features in the landscape such as a backdrop of trees have enabled a turbine structure to be accommodated, and where it would not break the skyline. Turbines approaching the range of 15-20m should be well related to existing vertical features, such as trees, which can be critical in providing a backdrop or screen and where the turbine cannot be viewed against the skyline from surrounding public viewpoints (including roads, rights of way and access land). Where trees are essential in providing screening or a backdrop and are under the control of the applicant, a management plan of ongoing maintenance will be a condition of any planning consent.
- 5.97 Large and medium scale wind turbines over 20m height (to rotor tip) and wind farms are not considered to be appropriate within the National Park given their intrusive nature and impacts on the landscape character and tranquillity.
- 5.98 In order to judge whether the potential impacts of a proposal are likely to be acceptable, applicants should consider the impacts of the wind turbine along with any required infrastructure, such as road access, on site-tracks, turbine foundations, hard standings, anemometer masts, a construction compound, electrical cabling and an electrical sub-station and control building. Some of these features are permanent and others are required only in the construction phase and as such are temporary. Applications should include any necessary supporting information regarding the assessment of impacts on landscape, wildlife, cultural heritage, historic environment and other resources as set out under the issues to be considered in proposals for renewable energy development (CC-S5) paragraphs 5.65 to 5.94.

²⁰⁹ ENPA (2012) Exmoor National Park Partnership Plan 2012-2017

²¹⁰ The Exmoor National Park Partnership Plan recognises a special quality of Exmoor National Park as *“A timeless landscape mostly free from intrusive development with striking views inside and out of the National Park and where the natural beauty of Exmoor and its dark night skies can be appreciated”*

CC-D3 SMALL-SCALE WIND TURBINES

- 1. Proposals for individual wind turbines serving individual properties or groups of properties will only be permitted where they are small scale and:**
 - a) appropriate in scale to the property being served, with a maximum height of 20m to rotor tip;**
 - b) there is no unacceptable landscape or visual impact including cumulative impacts; and any residual impacts are minimised by locating the turbine close to any associated development or features and by screening and colour of the turbine;**
 - c) there is no unacceptable adverse impact on tranquillity or amenity including the effects of shadow flicker and noise on nearby properties or access routes;**
 - d) the location does not conflict with the use of the area for recreation and access, and public safety is not compromised; and**
 - e) access to the site for construction and maintenance can be provided without damage to rural roads or historic bridges and fords.**

FREESTANDING SOLAR ARRAYS

- 5.99 A solar array is a linked collection of solar panels. Given the sensitivity of traditional buildings in the National Park to roof mounted panels, a number of schemes have come forward that mount solar panels on the ground or on stand-alone frames.
- 5.100 Small-scale freestanding solar arrays that are well screened in enclosed gardens or closely linked to existing buildings with no or minimal visual impact may be preferable to visually intrusive roof mounted panels. There may also be some circumstances where ground mounted solar arrays to serve groups of properties, community buildings, such as village halls, agricultural properties or other businesses are acceptable, where these are well screened within existing building complexes or by other landscape features such as hedgerows, walls or trees, and do not detract from any architectural or historic interest. However, freestanding arrays should be sensitively sited to avoid impacts on wildlife and land of high ecological interest. Applicants should highlight the benefits of a ground-mounted array in comparison to a roof-mounted array in these cases. Proposals should consider the potential impacts on the issues listed for renewable energy development (CC-S5), paragraphs 5.65 to 5.94, and provide relevant information to support the application. Flood Risk implications should also be considered (CC-D1).
- 5.101 Where permission is granted for ground mounted solar arrays in preference to roof mounted solar panels, the National Park Authority will attach a condition removing permitted development rights for roof-mounted solar panels to ensure that the cumulative impacts of any future proposals can be properly assessed.
- 5.102 Visual impacts are likely to be more significant where large numbers of panels are proposed in isolation or unconnected to the buildings or properties that they are intended to serve. Siting a solar array system in a field may constitute a change of use of the agricultural land, which would require planning permission. Proposals for ground-mounted solar arrays that are sited in isolation away from existing built forms are likely to have significant impacts on landscape character and visual amenity and are not considered to be appropriate within the National Park.

CC-D4 FREESTANDING SOLAR ARRAYS

- 1. Small scale freestanding solar arrays to serve the needs of individual properties, groups of properties, community buildings such as village halls, agricultural properties or other businesses will be permitted where:**
 - a) they are appropriate in scale and in proportion to the size of the property they are intended to serve;**
 - b) they are suitably sited and screened to avoid any intrusive visual or landscape impact, and where they are clearly associated with the buildings or properties that they are intended to serve;**
 - c) they are sensitively sited to avoid impacts on wildlife and land of high ecological interest;**
 - d) the design, colour and choice of materials minimises any visual impact; and**
 - e) they do not detract from the setting of listed buildings or other heritage assets, or cause damage to archaeological interests.**
- 2. Proposals for ground mounted solar arrays that are sited in isolation away from existing built forms will not be permitted.**

WASTE AND RESOURCE MANAGEMENT

CONTEXT

- 5.103 The National Park Authority is the Waste Planning Authority and this policy therefore sets out the planning policy for waste and resource management including anaerobic digestion.
- 5.104 The European Waste Framework Directive²¹¹ defines waste as “any substance or object the holder discards, intends to discard or is required to discard”.
- 5.105 The overall objective of Government policy on waste, as set out in the strategy for sustainable development, is to protect human health and the environment by producing less waste and by using it as a resource wherever possible. The Waste Framework Directive provides the overall direction for pursuing sustainable waste management. A review of this Framework put particular emphasis on the planning system in ensuring that waste management activities occur in sustainable ways at sustainable locations and that it is vital to apply the waste hierarchy. The waste hierarchy provides for more sustainable waste management through moving the management of waste up the ‘waste hierarchy’ of:
- i. Prevention: the most effective environmental solution is often to reduce the generation of waste, including the re-use of products;*
 - ii. Preparing for reuse: products that have become waste can be checked, cleaned or repaired so that they can be re-used;*
 - iii. Recycling: waste materials can be reprocessed into products, materials, or substances;*
 - iv. Other recovery, waste can serve a useful purpose by replacing other materials that would otherwise have been used; and*
 - v. Disposing only as a last resort: the least desirable solution where none of the above options is appropriate.*

²¹¹ Waste Framework Directive (European Directive (WFD) 2006/12/EC), as amended by the new WFD (Directive 2008/98/EC, came into force in December 2010)

“Once a substance or object has become waste, it will remain waste until it has been fully recovered and no longer poses a potential threat to the environment or to human health. From this point onwards, the waste ceases to be waste and there is no longer any reason for it to be subject to the controls and other measures required by the Directive.”

- 5.106 Consideration must be given to application of the waste hierarchy, to distinguish between those waste management options which deliver energy as part of the process, and those which do not. The Department of Environment, Food and Rural Affairs provide guidance on this in ‘Guidance on applying the Waste Hierarchy’²¹². Further guidelines are set out in “Taking sustainable use of resources forward: A Thematic Strategy on the Prevention and Recycling of Waste”²¹³ which aims to reduce the negative impact on the environment that is caused by waste, from production to disposal, via recycling. This approach means that every item of waste is seen not only as a source of pollution to be reduced, but also as a potential resource to be exploited.
- 5.107 The National Waste Management Plan²¹⁴ sets out the Government’s ambition to work towards a more sustainable and efficient approach to resource use and management. The National Planning Policy for Waste²¹⁵ sets out how the planning system can help to deliver this.

WASTE MANAGEMENT ON EXMOOR

- 5.108 Responsibility for planning for waste management in Exmoor National Park rests with the National Park Authority (as Waste Planning Authority). Domestic waste collection in Exmoor National Park is undertaken by contractors on behalf of the Somerset Waste Partnership and North Devon District Council. This waste is taken to waste recycling and treatment facilities outside the National Park based on contracts between the collection/disposal authorities and the waste industry. Within the National Park, waste is also taken to small reuse and recycling points. Waste collection from commercial and industrial premises within Exmoor National Park is carried out by commercial licensed waste carriers.
- 5.109 Given the overlap of administrative boundaries, the relevant waste planning authorities of Exmoor National Park Authority and the County Councils of Somerset and Devon, have agreed to work together closely in order to continue to achieve sustainable waste management. Both County Councils agree with the National Park Authority that the provision of large scale waste facilities for disposal, processing, recovery and recycling is inappropriate on Exmoor due to the area’s designation as a National Park. Facilities for the disposal of domestic, industrial and commercial waste are incompatible with National Park purposes because of potential adverse impacts and because they may require the importation of waste which is deemed inappropriate in a National Park. Exmoor National Park policy will therefore presume against new waste facilities within the National Park, and no sites will be allocated. Specialised processing sites, such as commercial composting and recycling plants, will also be inappropriate, because of the potential adverse impacts including on the landscape and the potential for air, land and water contamination (CC-S7 Pollution).
- 5.110 Through the Somerset Waste Core Strategy and Devon Waste Plan, and municipal waste management strategies, Somerset and Devon County Councils and the Somerset Waste Partnership will therefore plan for management of domestic waste arising from within the National Park. Data for domestic waste arising from West Somerset and North Devon Districts have informed both County Councils’ technical evidence base on capacity requirements. This means that domestic waste from within Exmoor National Park will continue to be treated or disposed of outside the National Park.

²¹² DEFRA (2011) Waste Hierarchy

²¹³ European Union (2005) Taking sustainable use of resources forward: A Thematic Strategy on the prevention and recycling of waste

²¹⁴ DEFRA (2013) Waste Management Plan for England

²¹⁵ DCLG (2014) National Planning Policy for Waste

5.111 Devon and Somerset County Councils have agreed to plan for the management of commercial and industrial waste from within Exmoor National Park, using the same source of baseline data provided by DEFRA²¹⁶ in 2010. Somerset County Council also carried out its own industrial and commercial waste survey to inform planning work²¹⁷. The Waste Planning Authorities have agreed to liaise closely in monitoring overall waste arising in the National Park area during the lifetime of their respective Local Plans.

CONSTRUCTION AND DEMOLITION WASTE

5.112 It is important to integrate waste management considerations into non waste developments, particularly by seeking to minimise the generation of waste in new developments, alterations and extensions, and encouraging sustainable construction methods including the use of recycled materials. Construction and demolition waste should be minimised and must be managed and re-used on site, providing that there will be no harmful impacts. However, where re-use on site may result in a risk to biodiversity, the historic environment (such as archaeology or the setting of a heritage asset), local communities or the water environment, appropriate off-site waste management or disposal will be required. The design of new development should incorporate adequate storage for recycling waste (CE-S6). The Somerset Waste Partnership, as waste collection authority has produced guidance on the requirements for domestic properties²¹⁸, and applicants within the Somerset area of the National Park are urged encouraged to contact them for advice.

5.113 Construction and demolition waste arising in the Exmoor National Park area is not expected to be significant given the level of current development in the National Park. However, (small-scale) major planning applications, i.e. for 10 or more dwellings or buildings greater than 1000sqm, are likely to generate a considerable volume of waste compared to the majority of minor developments in the National Park. Policy CC-S6 therefore requires that these applications should demonstrate how waste will be minimised and sustainably managed, both through the construction phase of the development, and its subsequent operation. This should include the potential for appropriate local reuse of topsoil and other relevant materials, in order to reduce transport miles. A waste audit will be required and included as part of the planning application and should provide the following information²¹⁹:

- a) The likely nature and volumes of waste generated through construction.
- b) How the design and layout of the development will minimise the amount of waste generated during the construction phase and the steps taken to separate and re-use appropriate wastes on site – where there will be no harmful impact on the environment or local amenity.
- c) How and where waste that cannot be re-used on site will be managed in accordance with the waste hierarchy including the potential for local re-use.
- d) Details of how waste will be managed sustainably once the site is operational e.g. incorporating storage space for recycling materials.

COMMUNITY WASTE SCHEMES

5.114 The National Park Authority recognises the role that Exmoor's communities can play in making more sustainable use of resources. Measures to drive waste management up the waste hierarchy²²⁰ including through the recycling and responsible reuse of waste via local, very small scale, community-based waste projects will therefore be encouraged. These should deal exclusively with the waste arising from that individual

²¹⁶ DEFRA (2015) UK Statistics on Waste 2010-2012

²¹⁷ Somerset County Council (2007) Industrial and Commercial Waste Survey

²¹⁸ Somerset Waste Partnership (2015) Developer Guidance

²¹⁹ DCLG (2014) Planning Policy Guidance, Paragraph: 049 Reference ID: 28-049-20141016

²²⁰ DCLG (2014) National Planning Policy for Waste (Paragraph 3)

community for reuse, recycling, or community composting. Community facilities should be well related to settlements, in accordance with GP3 Spatial Strategy, to reduce the need to travel, providing there is no unacceptable adverse impact on local communities, and the amenity, landscape, wildlife and cultural heritage of the National Park. Landscape and environmental impacts are likely to be greater in the open countryside outside settlements where this type of development is unlikely to be acceptable.

ANAEROBIC DIGESTORS AND AGRICULTURAL WASTE

- 5.115 The Government's Vision²²¹ for National Parks recognises the dual opportunities arising from anaerobic digesters in terms of managing waste, and creating a source of renewable energy. These may be particularly relevant in those parts of the National Park along the south west boundary with Devon designated as a Nitrate Vulnerable Zone (NVZ) where restrictions on spreading organic manure²²² may increase the need for either more storage facilities or for treatment by methods such as anaerobic digestion.
- 5.116 Small scale anaerobic digesters dealing with a mixed waste stream (which may include agricultural waste or manure and slurry) will be permitted with appropriate safeguards to ensure that they only use feedstock and waste from within the National Park or from parishes adjoining the National Park for those facilities located near the boundary, to avoid unnecessary traffic generation. In those circumstances where farms in close proximity wish to group together to achieve economies of scale and economic viability and so that there is sufficient feedstock for the digestion process, the National Park Authority will require a waste management plan to enable an assessment of whether the scale of both the development and operation of the proposal including traffic movements are acceptable within the locality and the National Park as a whole. Proposals will also need to accord with CC-S5 Low Carbon and Renewable Energy Development, and ensure that there will be no significant impact on the environment, the local community, and National Park purposes as set out in GP1. Environmental permitting and waste transfer carriers advice should be sought from the Environment Agency as regulator.
- 5.117 Despite the rural nature of the National Park, agricultural waste (including manure, slurry and spoiled straw) is not generally a significant issue for disposal as most is distributed naturally on pasture, collected from barns and agricultural sheds and managed in slurry pits or composted on the farm, then spread on the land as a natural fertiliser. Development of new farm or agricultural waste facilities, such as pits or tanks, is normally permitted development but can require planning permission in some circumstances, usually because of proximity to housing, protected buildings or highways. Where permission is required for development to address animal waste (excluding carcasses), small-scale waste management facilities on farms may be permitted provided that waste arises at least in part from the farm or farms concerned. Farm facilities should be suitably located on the farm to avoid harm to the area including to the National Park's special qualities, local amenity, landscape, wildlife and cultural heritage and traffic generation. Proposals should be consistent with Policy SE-S4 Agricultural and Forestry Development, and where they have the potential to cause pollution, CC-S7 Pollution.

WASTE FROM SEWAGE

- 5.118 Waste from sewage can harm the environment where capacity is exceeded and as a result of its transportation. To safeguarded environmental quality and the health and amenity of the National Park's residents, sewerage capacity and sewage disposal

²²¹ DEFRA (2010) English National Parks and the Broads: UK Government Vision and Circular (Paragraph 47)

²²² HMSO (2009) Environmental Permitting (England and Wales) (Amendment) (No. 2) Regulations

(including the process of disposal) must be appropriately managed. Exmoor National Park will seek to continue discussions around sewage arisings and capacity with South West Water and Wessex Water as service providers. Policies CC-S6 Waste Management and CC-D5 Sewerage Capacity and Sewage Disposal seek to ensure that these impacts are avoided and to provide appropriately for new or extended sewage infrastructure.

RESTORATION OF WASTE SITES

5.119 The National Park Authority will require appropriate restoration of waste sites to achieve National Park purposes. Such schemes should seek to achieve the conservation and enhancement of the National Park including for geodiversity, biodiversity, green infrastructure, historic environment and quiet enjoyment of the National Park.

CC-S6 WASTE MANAGEMENT

- 1. The National Park Authority will work with the waste collection and disposal authorities, partner organisations and local communities to promote sustainable management of waste through the waste hierarchy.**
- 2. Large scale waste facilities, including landfill sites and specialised processing plants, will not be permitted in the National Park.**
- 3. Construction and demolition waste should be minimised and must be managed and re-used on site where there will be no harmful impacts. Where re-use on site may result in an environmental risk to biodiversity, the historic environment (such as archaeology or setting of a heritage asset), local communities or the water environment, appropriate off-site waste management or disposal will be required.**
- 4. Applications for all major developments (for 10 or more dwellings or buildings greater than 1000sqm) must demonstrate how the construction and operational phases of the development will be consistent with the principles of sustainable waste management through a waste audit.**
- 5. Waste facilities for small scale reuse, recycling, and composting will only be permitted to meet the identified needs of, and serve individual local communities, where they do not include importation of waste from outside that community. Community waste facilities should be well-related to settlements, in accordance with GP3 Spatial Strategy, to avoid the need to travel, any unacceptable adverse impact on local communities and the amenity, landscape, wildlife and cultural heritage of the National Park.**
- 6. Small scale anaerobic digesters and waste management facilities on farms will only be permitted where they source feedstock and waste from within the National Park and/or from parishes adjoining the National Park. Farm facilities should be suitably located on the farm to avoid impacts on the natural and cultural environment and traffic generation. Proposals for anaerobic digesters should also accord with policy CC-S5 (low carbon and renewable energy development).**
- 7. Proposals relating to waste water and sewage facilities for storage and disposal should ensure that such infrastructure is appropriate in terms of its location, scale and design to avoid adverse impacts on the National Park and surrounding area (policy CC-D5).**
- 8. The National Park Authority will require the appropriate restoration and after-use of waste sites, through the application of appropriate conditions where necessary, based upon conservation and enhancement of landscape character, geodiversity and biodiversity, the historic environment and quiet enjoyment of the National Park.**

SEWERAGE CAPACITY AND SEWAGE DISPOSAL

CONTEXT

- 5.120 Sewage disposal (including the process of disposal) is important for the protection of public health. However it can have negative impacts on the environmental quality of land, air and water where capacity is exceeded. On Exmoor, Wessex Water and South West Water are the operators for mains waste water treatment. Additionally, a number of private operators dispose of non-mains sewage in the area. Sewerage infrastructure within the National Park is relatively small scale but forms an important component of the area's utility provision. For the purposes of this policy, sewerage infrastructure refers to new or extended sewage treatment works, and the transfer, processing, disposal or storage of sewage. Additional sewerage infrastructure or the expansion of existing infrastructure may be required during the lifetime of this Plan²²³ but are likely to be small scale due to the size of the population. Sewage from non-residential development, such as from boats, recreational development, and businesses, can also impact on the capacity of sewerage works.
- 5.121 Public mains sewerage infrastructure and non-mains sewerage, including septic tanks, are essential for public health, the maintenance of water quality and the prevention of pollution but can themselves have amenity, public health and environmental implications if they are not managed appropriately. The scale, siting and appearance of sewerage works are important considerations to ensure that what may otherwise be intrusive development is acceptable in the National Park.
- 5.122 Environmental impacts, such as emissions and discharges, are controlled under other legislation outside of planning management and are monitored by the Environment Agency²²⁴. Sewage treatment plants are classified as 'less vulnerable' development in areas of flood risk. Therefore provided adequate pollution control measures are in place, sewage transmission infrastructure and pumping stations are seen as water-compatible development (CC-D1 Flood Risk).

TYPES OF SEWAGE DISPOSAL

- 5.123 Sewage is carried from its source to the works by two types of sewerage system. In more modern systems, foul sewers are separated from systems that collect stormwater run-off, which is discharged directly into natural watercourses. It is however common, particularly in older areas, for foul and stormwater systems to be combined. In combined works, the flow and concentration of sewage entering treatment plant vary with rainfall, and when higher flows occur part of the sewage may be diverted and held in stormwater tanks. If the flow is very high, the sewage may be discharged, untreated into the surface watercourse. Ensuring the capacity of sewerage infrastructure is not exceeded is therefore essential to protect the environmental quality, public health and amenity of the National Park. The recycling and reuse of rainwater and greywater helps to minimise risks of overloading sewerage infrastructure and are encouraged in the National Park (CC-D2 Water Conservation).
- 5.124 Sewage sludge is treated outside the National Park by sludge treatment centres. Some sewage may be treated by private operators which are small and localised. Sewage treatment can result in a range of wastes which are deposited in different ways. Currently sludge recycling to agricultural land is accepted by DEFRA and the Environment Agency as the most sustainable option²²⁵. With advances in technology the operation area required for sewerage infrastructure has reduced in recent years.

²²³ Consultation results demonstrated people wanted to ensure adequate sewage infrastructure, including the extension of sewage treatment plants is provided in the National Park

²²⁴ For more information please see the Environment Agency website

²²⁵ Department of the Environment (1995) Sewage works and sewage farms: Industry Profile.

PUBLIC HEALTH, ENVIRONMENT AND AMENITY

- 5.125 Sewerage works are essential to protect public health. The sewage treatment process may however, result in point source localised contaminated land on site from organic pollutants and pathogens. Due to the nature and function of sewage treatment works it may be inappropriate to locate the development it serves in close proximity to sewage works to protect the amenity and health of the public²²⁶. The degree of any nuisance will vary according to the design and age of works, associated landscaping, local topography and prevailing wind. The enclosure of works and effective odour control measures can be used to mitigate against some of these impacts²²⁷. Safeguards are in place to prevent creating a statutory nuisance associated with odour emissions from sewerage infrastructure, including the identification of development restraint zones around sewage treatment works by the appropriate water company/sewerage undertaker, and their advice will be sought on individual cases.
- 5.126 The impact on water quality is a key consideration for applications regarding sewerage works with the possibility of pollution from the discharges of sewage infrastructure. Good water quality is important for Exmoor's biodiversity. Improvements have been made to the plant at Lynmouth and a new plant was built at Porlock. Problems regarding water quality can however, still occur due to overflows from combined sewer outflows or sewer capacity being exceeded during intense rainfall, which can lead to untreated or excessive organic material entering into rivers and out to sea. Non-mains drainage proposals, including the use of septic tanks, may have an adverse effect on the environment when there is a high water table or if the site is susceptible to flooding. This is likely to be exacerbated by the impacts of a changing climate which may mean that flood resilience measures to avoid overflows are required.

CAPACITY ISSUES

- 5.127 Housing development, in particular, can potentially increase the risk of water quality being affected due to extra loads being placed on sewerage works. The capacity of the sewerage infrastructure will be a key consideration in the drainage design process of any application. Where it is physically possible, development should connect to a public mains sewer and satisfactory arrangements should be made in consultation with the appropriate sewerage undertaker for the area to ensure the sewerage infrastructure can cope appropriately with additional demands before the development is occupied or activated.
- 5.128 If connection to a public sewer is not feasible, or available, other measures such as a sewage treatment plant incorporating a combination of treatment processes should be considered which will meet the standard and conditions set by the Environment Agency and are appropriate in the National Park context. Developers are encouraged to make a full assessment of the suitability of any proposals for non-mains sewerage systems at the project design stage. Only where mains sewage or a combined sewage treatment system are not feasible, taking into account practicability, and the scale and size of a development, should a system incorporating septic tank(s) be considered. Where a housing proposal has public mains sewerage constraints but is otherwise acceptable, the provision of septic tanks could be considered as part of the proposal. A proliferation of small private sewage treatment plants should however be avoided where possible, for reasons including landscape impact and a greater risk of environmental pollution.

²²⁶ Consultation highlighted concern over the loss of amenity through odour and noise from some local sewage works

²²⁷ Types of nuisances are listed in clause 1.b) of Policy CC-D5

- 5.129 Proposals which require non-mains sewerage must demonstrate that the proposal cannot be connected to a public mains sewer and must ensure arrangements are made to ensure sewerage capacity is not exceeded before development is occupied or activated.
- 5.130 If proposals require non-mains sewerage infrastructure and are assessed as being unsatisfactory, including where they are likely to lead to a significant environmental, amenity or public health problem(s) which cannot be overcome by means of a condition, planning permission will be refused. This will be the case even if the proposal is a temporary measure and will also apply to issues around maintenance and capacity.

CONSIDERATIONS FOR SEWERAGE INFRASTRUCTURE PROPOSALS

- 5.131 The design of sewerage infrastructure, whether for additional capacity, the replacement of existing facilities or provision of a new facility, (public or private), should result in the efficient use of infrastructure and should be compatible with the surrounding amenity, environment, public health and landscape. The National Park Authority encourages pre-application discussions on any potential impacts. Planning applications should, therefore, be supported by a full assessment of the proposed use of sewerage infrastructure. This assessment should include a thorough examination of the impact of disposal of the final effluent. Proposals must demonstrate that opportunities to mitigate impacts are taken. Pollution should also be taken into account and be consistent with CC-S7 Pollution. The Environment Agency, and the relevant statutory undertaker for the area will be important stakeholders and consultees in considering any appropriate sewage improvements which may be required for a proposal. Views from other key bodies, such as neighbouring LPAs, Natural England and Drainage Boards, may also be material in assessing the suitability of sewerage infrastructure and development requiring sewerage infrastructure improvements. An Environmental Permit or exemption will be required from the Environment Agency if it is proposed to discharge treated sewage effluent to controlled waters or ground²²⁸.
- 5.132 Under section 106 of the Water Industry Act 1991, and supported by planning case law, when connecting to a public mains sewer it is the undertaker's statutory duty to deal with the burden of additional discharge and not that of the developer. Conditions may be used where appropriate to ensure sewerage infrastructure is in place before the development is occupied or activated to avoid potential overloading whilst allowing appropriate development to be permitted.

²²⁸ As defined in Section 104 of the Water Resources Act 1991. Source: HM Government

CC-D5 SEWERAGE CAPACITY AND SEWAGE DISPOSAL

- 1. Development proposals for, or which require new or extended sewage infrastructure, will be permitted where it can be demonstrated that the facility will pose no unacceptable harm to public health, amenity or environmental quality. The following criteria must also be satisfied:**
 - a) the appropriate location, scale and design of the infrastructure (CE-S6);**
 - b) the use of necessary mitigation measures (including climate change resilience measures), to avoid impacts on surrounding areas including noise, air, soil and water pollution, odour, litter, visual intrusion, and other disturbances; and**
 - c) connection to a public mains sewer, where available and physically possible. Where existing capacity is insufficient, proposals should contribute to an integrated and adequate network of sewage treatment installations, sufficient to meet the needs of existing and proposed development. Proposals which require non-mains sewerage must demonstrate that the proposal cannot be connected to a public mains sewer.**
- 2. Satisfactory arrangements should be made to ensure the public sewerage infrastructure can appropriately manage the additional required capacity of the proposal before the development is occupied or activated.**
- 3. Development proposals which exceed the capacity of private sewerage infrastructure or which do not otherwise include satisfactory arrangements consistent with the requirements of this policy will not be permitted. For development proposals that require new or extended private sewerage infrastructure, this must be provided before the development is occupied or activated to ensure current sewerage capacity is not exceeded.**
- 4. Regularly occupied development such as residential buildings will not be permitted in locations likely to be unacceptably affected by the proximity of sewerage infrastructure.**

POLLUTION

CONTEXT

- 5.133 Pollution can lead to environmental damage, loss of amenity, detrimental impacts to quality of life, cause health issues and deplete our natural resources. Pollution can also damage Exmoor National Park's special qualities including its tranquillity, dark night skies and habitats which support a great diversity of wildlife²²⁹. ENPA will seek to ensure that new and existing development does not contribute to, or be put at unacceptable risk from, or be adversely affected by unacceptable levels of pollution²³⁰.
- 5.134 National policy advocates sustainable development, of which there is an environmental dimension, part of this role seeks to minimise pollution. Nationally it is noted that part of the core land-use planning principles, which underpin both plan-making and decision-taking, is the contribution to reducing pollution. The planning system should ensure that new and existing development does not contribute to and is not adversely affected by unacceptable levels of pollution (including cumulative impacts) and land should be remediated where appropriate. Planning focuses on whether development is an acceptable use of land, and the impacts of its use. The control of processes or emissions regarding pollution is subject to approval under other pollution control regimes which fall outside of planning powers²³¹.
- 5.135 Planning and pollution control operate within different legislative frameworks but complement each other. Pollution control aims to prevent pollution by limiting the release of substances and ensuring air and water quality meet standards that guard against impacts to the environment and human health. The planning system has an important role in determining whether the development, use of land and any impacts arising are acceptable. This includes consideration of additional pollution generated by road traffic, the demand for natural resources and any discharges to the environment associated with the proposed development.
- 5.136 There are various types of pollution which include air, soil, water, light and noise. Pollution can result from point or diffuse sources from various activities which can have direct or indirect impacts. Pollution may be generated outside the National Park boundary but may affect the area including local communities within it, or may be generated within Exmoor but affect areas and local communities outside. Partnership working with neighbouring authorities (including marine planning authorities) is therefore important to prevent and address pollution sources²³². Pollution can also be reduced by the actions of individuals, for example, car sharing, using sustainable transport modes, minimising water usage, and minimising artificial lighting to protect Exmoor's dark night skies (CE-S2).

AIR POLLUTION

- 5.137 Although Exmoor's air quality is generally good, it can be affected by pollution-laden winds from areas outside the National Park, including mainland Europe²³³. The 2007 Air Quality Strategy²³⁴ sets out plans to improve and protect the air quality in the UK. Good air quality is important for human health and sensitive habitats such as Exmoor's internationally important heathland and oak woodlands. Some of Exmoor's habitats are sensitive to acidification which can be caused by pollutants, such as sulphur and nitrogen oxides, which create acid rain. In 2006, the Environment Agency and English Nature undertook an assessment that showed that overall nitrogen deposition

²²⁹ ENPA (2012) Exmoor National Park Partnership Plan 2012-2017. *Exmoor National Park Authority, Dulverton*

²³⁰ DCLG (2012) National Planning Policy Framework (Paragraph 120). Department of Communities and Local Government

²³¹ DCLG (2012) National Planning Policy Framework (Paragraph 122). Department of Communities and Local Government

²³² ENPA (2010) Your Future Exmoor consultation events

²³³ Exmoor's Core Strategy and Development Management Policies Sustainability Appraisal Scoping Report

²³⁴ DEFRA (2007) The Air Quality Strategy for England, Wales, Northern Ireland and Scotland

exceeded the maximum critical loads for blanket bog and old sessile oak woods on Exmoor indicating that they could be at risk from air pollution²³⁵.

- 5.138 District Councils have a statutory duty for local air quality management²³⁶. They are required to carry out regular reviews and assessment against national objectives. Where it is found that objectives are unlikely to be met, air quality management areas (AQMA) must be designated to tackle the issue of air quality. Although no AQMA have been designated within Exmoor National Park, national surveys show that ground level ozone levels on Exmoor can occasionally reach very high levels during certain atmospheric conditions and can exceed European guidelines²³⁷. This can be harmful to human health, but such impacts cannot be controlled through planning policy.
- 5.139 Future development on Exmoor has the potential to detrimentally impact local air quality and therefore should be managed appropriately. Some proposals could lead to increased air pollution and in these cases the application must include measures to demonstrate that impacts are minimised to an acceptable level. Consideration should be given to neighbouring properties including the impact of unpleasant odours. The emission of greenhouse gases from development is an issue not only locally but in a wider context²³⁸.
- 5.140 Development within the National Park is generally small in scale and so is unlikely to cause significant impacts on air quality. However some proposals can have the potential to cumulatively cause air pollution including through their impact on the surrounding transport network; opportunities for sustainable transport measures will therefore be a key consideration (AC-S1 Sustainable Transport). Other measures to improve air quality can include energy-efficiency measures in building design and construction as well as the use of appropriate low carbon renewable energy sources (CC-S1 Climate Change Mitigation and Adaptation; CC-S5 Low Carbon and Renewable Energy Development, CE-S6 Design and Sustainable Construction Principles).

SOIL POLLUTION AND CONTAMINATED LAND

- 5.141 Soil pollution can arise from different sources including agricultural activities and fuel storage. For Nitrate Vulnerable Zones (NVZ) guidance is given by DEFRA and the Environment Agency on the storage of organic manure based on the requirements of the Nitrate Pollution Prevention Regulations. Good agricultural practice for farmers, growers and land managers is also provided.
- 5.142 Soil pollution can lead to contaminated land, which can in turn can lead to a number of issues including: impacts on human health, buildings (chemical and physical), and the natural environment where pollution affects ecosystems and wildlife populations. Land contamination is not restricted to previously developed industrial land but can also occur on greenfield sites and from natural sources as well as human activities. North Devon and West Somerset District Councils are required to identify, inspect and remediate land in their districts for contamination²³⁹.
- 5.143 Planning also has a role to play in dealing with contaminated land as it provides the means to secure appropriate investigation and remediation. In following this approach, land contamination is a material consideration. Where development is proposed on land that could be contaminated, a site investigation will usually be required. If

²³⁵ ENPA (2011) Sustainability Appraisal Scoping Report. *Exmoor National Park Authority, Dulverton* - further information is also available from Exmoor's Habitat Regulations Assessment

²³⁶ HM Government (1995) The Environment Act

²³⁷ ENPA (2011) Sustainability Appraisal Scoping Report. *Exmoor National Park Authority, Dulverton*

²³⁸ ENPA (2010) Exmoor Carbon Neutral Programme Consultation. *Exmoor National Park Authority, Dulverton*

²³⁹ Under Part IIA of the Environmental Protection Act 1990 (EPA), which came into force on the 1st of April 2000

contamination is found, remedial works would be required to make the land suitable for its intended end use²⁴⁰ as a condition of any planning permission.

- 5.144 Contamination may create issues away from its source through transport as a result of wind or water for example. Proposals for development such as housing with gardens, schools, nurseries or allotments where contaminated land would be a particular issue, should consider its possible presence. Each area of potentially contaminated land is likely to be different in terms of its particular contamination and a site specific approach to remediation will therefore be necessary. The Environment Agency has a role in assisting Local Authorities on providing site-specific local guidance.
- 5.145 A wide range of industries may historically have contaminated, or have the potential to contaminate the land they are sited upon (as well as neighbouring land). The Environment Agency set out further details on the processes, materials and wastes associated with individual industries which have potentially contaminating land uses and situations where land may be affected by contamination. This includes:
- a) Agriculture
 - b) Timber treatment
 - c) Naturally occurring radioactivity including radon
 - d) Methane and carbon dioxide production²⁴¹
- 5.146 When determining planning applications for land that may be contaminated, the National Park Authority will consider whether the proposal takes acceptable account of contamination and whether actions are taken to remediate land to protect the environment and health of future users of the land if contamination is found. As Exmoor has a long history of mineral extraction there may be a number of sites within the National Park which have some pollution risk if disturbed.

WATER POLLUTION

- 5.147 Exmoor's high quality clean water resource is vital to a wide range of interests including its nature conservation, fisheries, water supply and bathing water quality as well as its amenity value. Exmoor's river corridors provide important wildlife habitats and make an important contribution to the landscape of the National Park. Overall the quality of Exmoor's rivers are rated as very good or good by the Environment Agency. However, there have been some instances where some of Exmoor's rivers have been identified as poor in terms of ecological status²⁴².
- 5.148 Poor water quality (including bathing water quality) can be the consequence of a range of diffuse sources and point source pollution including agricultural activities, abstraction, disused mines, industrial discharges, accidental spillage, sewage discharge (CC-D5) and the physical modification of water bodies. To ensure the high quality water environment on Exmoor is maintained, activities in catchments, and those directly affecting the water resource itself, must be managed. Although many of these activities lie outside planning control, planning has a significant role in avoiding and mitigating the impact of pollution from new development proposals, such as through their location and design. Pollutants arising from agricultural activities may include silage effluent, milk and slurry. In some cases the use of covers on slurry stores may be appropriate to reduce the risk of overflowing and discharge.
- 5.149 Natural fluctuations in water levels occur, and lower levels of water can result in a higher concentration of contaminants and can therefore lead to poor water quality. Increased abstraction of water can also lead to low water flows and a lowering of water tables. Furthermore climate change is likely to add to the issue of low water flows.

²⁴⁰ North Devon Council (2009) Contaminated Land Strategy 2009-2014; West Somerset Council (2011) Environmental Health and Licensing Contaminated Land Inspection Strategy 2011 to 2015

²⁴¹ Environment Agency (1995) Land contamination: Department of Environment (DOE) industry profiles

²⁴² ENPA (2014) Annual Monitoring Report 2013-2014. *Exmoor National Park Authority, Dulverton*

Water conservation is therefore closely related to water quality. Catchment abstraction management strategies are produced by the Environment Agency for the management of local water resources and should be referred to by proposals which may have an impact on water resources (CC-D2). Flooding can also precipitate pollution and proposals which may affect or be affected by flooding should be consistent with CC-D1. Opportunities to minimise environmental damage and diffuse pollution through the incorporation of sustainable drainage systems is supported (CE-S6 Design and Sustainable Construction Principles).

- 5.150 New development, which may affect groundwater in certain areas of the National Park, must take into account groundwater Source Protection Zones (SPZs), shown on the Policies Map, and aquifer designations²⁴³. The emphasis is on the prevention of pollution rather than a reactive approach to cleaning up pollution events. This approach minimises the likelihood of future problems. Necessarily, the need to protect groundwater in these zones places constraints on certain types of development particularly those such as landfilling, slurry tanks, oil storage, chemicals and housing which is dependent on effluent disposal through soakaways. Indirect issues including disturbance of contaminated land and its impact on water resources must also be considered in development proposals (see section on 'Soil Pollution and Contaminated Land').

LIGHT AND NOISE POLLUTION

- 5.151 The proliferation of artificial lighting has led to the deterioration of the night sky in some areas. Proposals should therefore demonstrate management of light pollution is consistent with CE-S2 Protecting Exmoor's Dark Night Sky. Proposals that are likely to result in unacceptable light pollution will not be appropriate in the National Park including from illuminated advertisements (CE-D5 Advertisements and Private Road Signs). Tranquillity which results from the experience of a combination of low noise and dark night sky is a special quality of Exmoor. The quiet enjoyment of the National Park is supported by Policy RT-S1 Recreation and Tourism. Noise is defined as 'unwanted sound' and its impact is a material consideration in determining planning applications. Unacceptable intrusive noise generating development is inappropriate in the National Park context and will not be permitted where it would have a significant adverse impact on Exmoor's special qualities, health, environment, surrounding land uses, quality of life or amenity. Adverse impacts should be minimised to an acceptable level. Planning obligations and conditions may be used to mitigate the effects of noise (GP5 Securing Planning benefits – Planning Obligations). It is however recognised that existing businesses should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established²⁴⁴.

MINERAL EXTRACTION AND WASTE DISPOSAL

- 5.152 Mineral extraction and waste disposal if not managed acceptably, have the potential to result in significant environmental impacts including the creation of pollution both directly and indirectly through the generation of traffic. Most mineral extraction applications will need to be accompanied by a formal environment statement to ensure that impacts arising from extraction including any pollution of the air, water or soil will be kept to an acceptable level compatible with its location within a National Park (CE-S7 Small Scale Working or Re-working for Building and Roofing Stone and CC-S6 Waste Management).

²⁴³ The Environment Agency provides the latest groundwater SPZ's and aquifer designation data and maps. Source: Environment Agency (2015) What's in my backyard?

²⁴⁴ DCLG (2012) National Planning Policy Framework. (Paragraph 123). Department of Communities and Local Government

CONSIDERATIONS FOR PROPOSALS

- 5.153 When considering the impact of a development, the various forms of potential pollution including air, soil, water, noise and light, from both individual and cumulative sources will be considered. Applicants are encouraged to discuss proposals with the National Park Authority at an early pre-application stage where pollution issues are likely to arise so that relevant issues and information which may be required to accompany a proposal will be considered. The Environment Agency provides guidance on pollution prevention measures and is a key stakeholder in assessing the potential pollution implications of proposals. Further information on the impact of pollution on Natura 2000 sites is provided by the Exmoor National Park Habitat Regulations Assessment²⁴⁵. The careful siting, layout, design and choice of materials can help to minimise energy loss and thus carbon emissions as well as other environmental pollutants and help to conserve natural resources such as water. Such design considerations should also be in conformity with other design principles to ensure that they are compatible with National Park purposes (CE-S6 Design and Sustainable Construction Principles; SE-S4 Agricultural and Forestry Development).
- 5.154 The National Park Authority will require sufficient information on environmental impacts to enable planning applications to be determined. Where insufficient information is available for potentially high-risk developments, permission is likely to be refused. Development may provide an important opportunity for improving pollution levels and alleviating contaminated land. Proposals which seek to reduce pollution levels in Exmoor and are compatible with the National Park purposes and special qualities are encouraged; for example, through sustainable travel plans, carbon reduction or mitigation e.g. renewable technologies (AC-S1 Sustainable Transport; CC-S1 Climate Change Mitigation and Adaptation; CC-S5 Low Carbon and Renewable Energy Development; CC-D3 Small-Scale Wind Turbines; CC-D4 Freestanding Solar Arrays).
- 5.155 All proposals should avoid pollution where possible by using preventative measures, minimising any residual impacts, storing materials appropriately and remediating contaminated land where required before development proceeds.

CC-S7 POLLUTION

- 1. Applicants should first seek to avoid pollution where possible including through using preventative measures and working in partnership.**
- 2. Where pollution cannot be avoided development proposals will be expected to demonstrate that there will be no unacceptable adverse impacts individually or cumulatively on the environment (including groundwater source protection zones, natural resources), public health, communities, quality of life, amenity and neighbouring land uses including areas outside of the National Park by:**
 - a) minimising any residual impacts to an acceptable level;**
 - b) storing materials including agricultural slurry/by-products in a way that will not pollute the surrounding environment and natural resources including in flood events; and**
 - c) remediating contaminated land before development proceeds (in the case of proposals on or affected by contaminated land).**
- 3. Proposals which seek to reduce pollution and include measures to improve the quality of the surrounding environment and resources will be encouraged.**

²⁴⁵ ENPA (2011) Core Strategy and Development Management Policies: Habitats Regulations Assessment Scoping Report. Exmoor National Park Authority, Dulverton

6. ACHIEVING A THRIVING COMMUNITY

Objective 12: *To address local and affordable housing needs, making the best use of existing developed land and buildings; ensuring a mix of housing and a housing stock which helps sustain local communities.*

Objective 13: *To improve the sustainability, resilience and self-sufficiency of the National Park's settlements by supporting the retention, provision of, and access to community services and facilities.*

HOUSING

CONTEXT

- 6.1 The housing policies in this section aim to provide the framework to address the housing needs of the National Park's local communities to ensure that the level of housing development is compatible with the conservation and enhancement of Exmoor. The focus is on addressing the needs of those people who live and work in the area, prioritising the need for affordable housing and ensuring that the National Park's housing stock as a whole meets the needs of all sections of the local community. Providing a range of accommodation types and sizes and thereby a better mix of houses should help create more balanced, living and working communities.
- 6.2 National policy for the delivery of housing in rural areas is that local planning authorities should respond to local circumstances and plan for housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate.²⁴⁶
- 6.3 The National Planning Policy Framework (NPPF) sets out a presumption in favour of "sustainable development" and indicates where development should be restricted.²⁴⁷ Objectively assessed needs should be met unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole, or where specific policies in it indicate development should be restricted. Such policies include those within a National Park.²⁴⁸ The Government has clarified that need alone is not the only factor to be considered. Great weight should be given to conserving landscape and scenic beauty in National Parks, which have the highest status of protection in relation to landscape and scenic beauty.²⁴⁹ The PPG acknowledges that housing supply and affordability are issues in rural areas, recognising the role of housing in supporting the broader sustainability of rural settlements to ensure the viable use of local services and facilities to maintain thriving communities.²⁵⁰

²⁴⁶ DCLG (2012) National Planning Policy Framework, London: Department of Communities and Local Government, para. 54.

²⁴⁷ Ibid. para. 14 and footnote 9 to para. 14.

²⁴⁸ DCLG (2014) Press Release on the Gov.UK website: Councils must protect our precious green belt land [Online], Available: <https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land> [4 Oct 2014].

²⁴⁹ DCLG (2012) National Planning Policy Framework, London: Department of Communities and Local Government, para. 115.

²⁵⁰ DCLG (2014) Planning Practice Guidance: How should local authorities support sustainable rural communities? Paragraph 001, Reference ID: 50-001-20140306 [Online], Available: <http://planningguidance.planningportal.gov.uk/blog/guidance/rural-housing/how-should-local-authorities-support-sustainable-rural-communities/>

6.4 The NPPF refers to the National Parks and the Broads Vision and Circular. In National Parks it wishes to foster local communities living in landscapes notable for their natural beauty; with the focus on the local need for affordable housing as part of sustainable local rural communities and economies. It recognises that National Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them. Authorities should include policies that pro-actively respond to local housing needs.²⁵¹

Past Approaches to Housing Provision in Exmoor National Park

- 6.5 It has consistently been recognised that National Parks are not suitable locations for unrestricted housing development. Previous strategic plans focused on the need for affordable housing in rural areas to meet the needs of local communities only.²⁵² Previously, rates of new house building/conversions within the National Park had consistently exceeded Structure Plan housing provision figures but had very little impact in helping provide housing to satisfy local needs and house prices continued to rise.²⁵³ The strategic approach to housing in the Joint Structure Plan, and, subsequently, the draft South West Regional Spatial Strategy (RSS) was therefore to help meet local needs for housing.²⁵⁴ The draft RSS provided for an estimated provision against local needs only and did not set housing targets for the Exmoor National Park thereby enshrining a needs led approach to only provide housing where need was demonstrated and where it did not otherwise conflict with Park purposes.²⁵⁵
- 6.6 The approach in previous Park-wide Local Plans had been to encourage affordable housing.²⁵⁶ Within the context of restraint necessary in a National Park, the 2005 Plan provided a clear focus that, exceptionally, new affordable housing to meet local need and delivered through a needs led 'exceptions' approach would be considered to ensure that the needs of local communities were prioritised.²⁵⁷ An important principle underpinning the approach was that the level of housing development should be compatible with the conservation and enhancement of Exmoor making maximum use of existing accommodation and buildings to reduce the need for greenfield development.
- 6.7 This focused approach resulted in the number of new affordable homes completed in the National Park in 2011/12 outstripping the number of open market homes for the first time and showing that the policies were having the intended effect.²⁵⁸

²⁵¹ DEFRA (2010) English National Parks and the Broads UK Government Vision and Circular, London: Department for Environment, Food and Rural Affairs, para. 78.

²⁵² GOSW (2001) Regional Planning Guidance for the South West: RPG10, paras. 7.9 to 7.16 and Policy HO3.

²⁵³ Exmoor National Park Authority (2005) Exmoor National Park Local Plan 2001-11, Dulverton: ENPA. Para. 4.6, Table 4.1.

²⁵⁴ Somerset County Council and Exmoor National Park Authority (2000) Somerset and Exmoor National Park Joint Structure Plan Review 1991-2011, Somerset County Council and Exmoor National Park Authority Policy 33: Provision for Housing. Taunton: SCC and ENPA. South West Regional Assembly (2006) Draft Regional Spatial Strategy for the South West 2006-26, Taunton: SWRA, Policy SD4, para. 3.5.3, Development Policy C, para. 4.5.3 and Table 4.1.

²⁵⁵ South West Regional Assembly (2006) Draft Regional Spatial Strategy for the South West 2006-26, Taunton: SWRA, para. 4.5.3 and Table 4.1.

²⁵⁶ Exmoor National Park Authority (1997) Exmoor National Park Local Plan 1991-2001, Dulverton: ENPA.

²⁵⁷ Exmoor National Park Authority (2005) Exmoor National Park Local Plan 2001-11, Dulverton: ENPA. Chapter 4 pp 64-83.

²⁵⁸ Exmoor National Park Authority (2012) Annual Monitoring Report 2011-2012, Dulverton: ENPA, chart 6.2 and para. 6.31.

EXMOOR NATIONAL PARK'S POPULATION AND HOUSING MARKET

- 6.8 Exmoor's population declined by 5.5% from 10,873 in 2001 to 10,273 in 2011.²⁵⁹ Comparison with England as a whole, indicates the extent to which Exmoor's population profile is skewed towards older age groups:
- a) a higher than average proportion (around 30%) is aged 65 or above - the same as West Somerset district which has the highest average age in England;²⁶⁰
 - b) almost twice the average proportion (35%) is aged 45 to 64;²⁶¹
 - c) a lower than average proportion of younger people: 25-44 year olds are 16% of Exmoor's population and under 24 year olds 20%.²⁶²
 - d) the proportion of households with one person, and particularly two people, is higher than average. Nearly 20% of households are over 65s living alone. By contrast, the proportion of households with children is lower than average²⁶³
 - e) Internal migration (people moving into the area from other parts of the UK including the South East, London, the Midlands and East Anglia)²⁶⁴ is predicted to be the most significant reason for population change, predominantly of older age groups, resulting in a net increase in Exmoor's population.²⁶⁵
- 6.9 Exmoor's housing market therefore continues to be under considerable pressure as the high quality environment of the National Park makes it an attractive place for people to retire to or own a second home.
- 6.10 Evidence on the occupancy of open market houses permitted in line with planning policies from previous Local Plans showed that 30% of new properties were occupied by retired people (77% of whom came from the south east region and elsewhere in the UK) and 23% as second or holiday homes. Of the fully occupied properties (i.e. excluding the 23% second/holiday homes) only one in five of the smaller one and two bedroom properties and one in 10 of all new homes went to people from National Park communities.²⁶⁶ This is confirmed by recent housing projections and which are entirely due to projected demand from households moving from other parts of the UK rather than locally arising needs.²⁶⁷
- 6.11 Between 2008 and 2011, the 45 to 64 age group moved in greatest numbers to the area while younger people and a smaller number of older people moved away. Large increases in the proportion of people aged over 65 and even greater increases in those aged 85 and above are predicted to 2035.²⁶⁸ As retired people continue to move into the area and older people become more aged, the age imbalance is likely to become more acute. Continuing to address the local need for affordable housing remains an urgent task to help ensure that younger people of working age can remain in the National Park to achieve balanced and sustainable communities on Exmoor.

²⁵⁹ Office for National Statistics (2013) 2011 Census: Key Statistics for National Parks in England and Wales, [online]: Available: <http://www.ons.gov.uk/ons/rel/census/2011-census/key-statistics-for-national-parks-in-england-and-wales/index.html>

²⁶⁰ Housing Vision (March 2015) Strategic Housing Market Assessment Update: Exmoor National Park, Dulverton: Exmoor National Park Authority, para 2.2 and Table 2.1.

²⁶¹ Ibid.

²⁶² Ibid.

²⁶³ Housing Vision (2015) Strategic Housing Market Assessment Update: Exmoor National Park, Dulverton: Exmoor National Park Authority, paras 2.2 to 2.4 and Housing Vision (January 2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset, Dulverton: Exmoor National Park Authority. Paras 2.3 to 2.4 and Table 2.1.

²⁶⁴ Housing Vision, Northern Peninsula Strategic Housing Market Area Assessment. (2008) Housing Vision (2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset, Dulverton, ENPA, Map 2.11 & p75.

²⁶⁵ Housing Vision (2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset, Dulverton, Exmoor National Park Authority, p78.

²⁶⁶ Exmoor National Park Authority (2000) Residential Occupancy Survey, Dulverton: Exmoor National Park Authority.

²⁶⁷ Housing Vision (2015) SHMA Update: Exmoor National Park, Dulverton: ENPA, para 5.11.

²⁶⁸ Ibid, p 92.

EXMOOR NATIONAL PARK'S HOUSING STOCK

- 6.12 New build dwellings account for only a small proportion of all housing in the National Park. Nearly 90% of the total stock are houses of which almost half are detached. There are fewer one and two bedroom dwellings and more modest (and more affordable) terraces and flats and a well above average proportion of larger bedroom homes.²⁶⁹
- 6.13 Two thirds of Exmoor's housing is owned, nearly half outright. About one third is rented with approximately 16% in the private rented sector much of it for holiday letting purposes. The proportion of the housing stock which is affordable shared ownership or social rented tenures is 14% - below the regional and national average.²⁷⁰ 19% of all housing is second/holiday or empty homes.²⁷¹ This adds pressure to the limited housing stock and further exacerbates affordability issues and the ability (or otherwise) to satisfy the needs of local communities.
- 6.14 The 'Right to Buy' of Council properties, introduced in 1981 had a significant impact on Exmoor's affordable housing stock.²⁷² At the time of drafting, concerted efforts on affordable housing were only just beginning to match the number of Exmoor's affordable homes lost through Right-to-Buy.
- 6.15 As a designated 'rural area', new registered housing provider (RP) properties built after April 1996 were excluded from 'Right-to-Buy'. National changes enable RPs to sell affordable homes on the open market to help fund new schemes which, to date, have all been outside the National Park (sales do not apply to affordable homes subject to a local needs occupancy tie). This reduces the stock of affordable housing for those in housing need. Since suitable housing sites on Exmoor are few and finite and the delivery of new schemes is complex, ENPA, working with partners, will seek the retention of affordable housing for the longer term.
- 6.16 More recent planning policies have sought to provide for a better mix of dwellings types and sizes - between 1992 and 2000 most dwellings approved and built in the National Park were larger, generally three bedroom houses.²⁷³ Local need affordable housing completed since 2005, has tended to be more modest in size - the majority have two bedrooms.
- 6.17 Table 6.1 shows that a targeted approach to providing for local needs affordable housing has resulted in occupancy by households with a high proportion of children, young people and working age adults - the reverse of the age profile for those older households who tend to move to market homes in the National Park.²⁷⁴ Provision of local need housing provides an opportunity for those with a local connection who cannot afford to buy open market housing, including younger/working age people and families, to remain living in the National Park helping to achieve a more balanced community.

²⁶⁹ Housing Vision (2015) Strategic Housing Market Assessment Update, Exmoor National Park, Dulverton: ENPA Table 3.1.

²⁷⁰ Housing Vision (2015) Strategic Housing Market Assessment Update: Exmoor National Park, Dulverton: Exmoor National Park Authority, Table 3.2.

²⁷¹ Office for National Statistics (2013) 2011 Census: Key Statistics for National Parks in England and Wales, Percentage of households with no usual residents. [online]: Available: <http://www.ons.gov.uk/ons/rel/census/2011-census/key-statistics-for-national-parks-in-england-and-wales/index.html>

²⁷² Figures supplied by Magna West Somerset and North Devon Homes Housing Associations to whom West Somerset and North Devon local authority housing stock was transferred.

²⁷³ Exmoor National Park Authority(2000) Residential Occupancy Survey, Dulverton, Exmoor National Park Authority,

²⁷⁴ Exmoor National Park, West Somerset and North Devon Rural Housing Project (2012 & 2013) Age Range of Occupiers of Local Need Affordable Housing in Exmoor National Park (based on age provided at time of initial occupation and projected forward) , Dulverton, Rural Housing Project.

Table 6.1 Age Range of Occupants of Local Needs Affordable Homes in Exmoor National Park

Occupancy at January 2012 and September 2013	
Age Range	Number of Occupants
0-9	47
10-19	20
20-29	56
30-39	34
40-49	15
50-59	8
60-69	8
70-79	2
80+	1
Age not known	4
Total Number Housed	195

HOUSING AFFORDABILITY IN EXMOOR NATIONAL PARK

Income

6.18 Housing 'affordability' has to be considered at a local level in the context of local incomes and house prices. Average gross household income within the National Park is between £28,000 and £29,000.²⁷⁵ Many people however, are on lower incomes and in the area of the National Park within West Somerset, 45% of households are dependent on incomes of £20,000 or less (with lower quartile incomes at £16,000).²⁷⁶ This is substantially lower than the national average. As well as many seasonal and part-time jobs, a high proportion - over a quarter - of West Somerset's work-force is self-employed with average earnings 14% lower than employee-employment equivalents.²⁷⁷ Comparing rental levels and house prices with income levels and the availability of mortgages within the National Park demonstrates the magnitude of the problem.

House Prices, Rental Levels and Affordability

6.19 Between 1998 and 2012 average asking prices rose by over 300% in the National Park due to very high external market demand.²⁷⁸ In 2013, the average Exmoor asking price was £325,000 - 25% higher than the South West and 16% higher than England and Wales.²⁷⁹ The ratio of average house price to average household income was 14:1. The price of smaller properties was also high. The average asking price of lower quartile (or the bottom 25%) of houses was £180,000 and the ratio to lower quartile income was 11:1.²⁸⁰ Consequently, the majority of properties is well beyond the means of many local people in housing need, especially first-time buyers and families needing larger accommodation.

²⁷⁵ DEFRA Rural Statistics Unit (2010) - National Parks: Economic Comparison.²⁷⁵

²⁷⁶ Housing Vision (2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset, Dulverton: Exmoor National Park Authority, p32.

²⁷⁷ Ibid para 2.11-2.12

²⁷⁸ ENPA (2012) Exmoor National Park Annual House Price Survey, Dulverton: Exmoor National Park Authority, Table 1.

²⁷⁹ ENPA (2013) Exmoor National Park Annual House Price Survey, Dulverton. ENPA: (median average house price).

²⁸⁰ Ibid, median average figure.

- 6.20 If 25% of gross income being spent on rent is taken as a proxy for affordability, private market rents in Exmoor were beyond the reach of many households on an average income. This was particularly the case for those families requiring a larger (3-4 bed) property.²⁸¹
- 6.21 Social rental levels were affordable to households on average income but only one and two bed housing was affordable for those households on lower quartile incomes. Larger homes were borderline affordable or unaffordable.²⁸²
- 6.22 National changes to offset reductions in public housing grants and the introduction of 'Affordable Rents', pegged at up to 80% of local open market rents, have led, where affordable rents have been applied, to higher (and less affordable) rents on Exmoor than social rent levels. On average incomes 80% rents were affordable for up to three bedroom housing only. All properties (including 1 bed dwellings) were at the higher end or above what was considered affordable for those on lower quartile incomes.²⁸³

LANDSCAPE SENSITIVITY AND HOUSING LAND AVAILABILITY

- 6.23 Severe physical constraints, such as flood risk and topography and the sensitivity of Exmoor's landscape, affect the capacity of Exmoor's settlements to absorb more housing development. The Landscape Sensitivity Study for Exmoor National Park sets out the landscape capacity for new build housing on greenfield sites in each settlement named in the adopted Local Plan²⁸⁴. Within the context that land in a National Park is recognised as being nationally important, greenfield land in and around existing named settlements was assessed in terms of its landscape sensitivity to new build housing. It assessed that the total landscape capacity of all settlements named in the 2005 Local Plan over the longer term (beyond the period of the Local Plan) was 333 units.
- 6.24 The Exmoor National Park Strategic Housing Land Availability Assessment (SHLAA) examined the potential of land to deliver future housing development to address identified need over the plan period. It was based on realistic assumptions about the availability and suitability of land taking account of constraints. The potential for the re-use of existing buildings was also examined and those considered suitable were included as a means of delivering housing and to reduce the need for greenfield land. The SHLAA supply within the National Park was calculated as 249 units.²⁸⁵
- 6.25 There is a low number of brownfield sites suitable for new housing within the National Park. If the few remaining suitable housing sites and traditional buildings within Exmoor's settlements are not used to provide local needs housing then it will put pressure on other sites outside settlements that have the potential to harm the landscape. The approach of providing housing to meet local needs through the Local Plan has to be based upon the 'exceptions' approach - to grant planning permission where general open market housing would not be permitted. Sites will not be allocated, instead they will be released on an individual basis, based upon the needs evidence provided by the applicant/developer.

²⁸¹ Nathaniel Lichfield and Partners (2012), Assessment of Housing and Affordable Housing Needs, Dulverton: Exmoor National Park Authority, para 2.30.

²⁸² Ibid. Table 2.3

²⁸³ Nathaniel Lichfield and Partners (2012), Assessment of Housing and Affordable Housing Needs, Dulverton: Exmoor National Park Authority, Table 2.3 & para. 2.31.

²⁸⁴ Bryan, P. (2013) Exmoor National Park Landscape Sensitivity Study 2013, Dulverton: Exmoor National Park Authority.

²⁸⁵ Exmoor National Park Authority (2014) Exmoor National Park Strategic Housing Land Availability Assessment, Dulverton: Exmoor National Park Authority.

HOUSING NEED

Objectively Assessed Need

- 6.26 In line with national policy, the need (both affordable need and market demand) for housing in the Northern Peninsula Housing Market Area has been objectively assessed and updated. The 2008 Northern Peninsula Strategic Housing Market Assessment was prepared in partnership with the other local authorities within the same housing market area (North Cornwall, Torridge, North Devon West Somerset and Exmoor National Park).²⁸⁶ To take account of the changed economic and market conditions since the preparation of the original assessment, separate updates were completed between 2012 and 2014.²⁸⁷ In early 2015, a joint Northern Peninsula Strategic Housing Market Area (SHMA) Update was carried out to provide evidence for Torridge, North Devon, West Somerset and the National Park.²⁸⁸ Together with a Cornwall Council assessment of the requirement and future delivery of housing in the former North Cornwall district, it provides evidence on future population-led growth to underpin planning for the delivery of housing in the Housing Market Area over the plan period.
- 6.27 The Government has clarified that need alone is not the only factor to be considered. Objectively assessed need should not be met if adverse impacts would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF, or where specific policies indicate development should be restricted, such as within a National Park.²⁸⁹ Great weight should be given to conserving landscape and scenic beauty in National Parks, which have the highest status of protection in relation to landscape and scenic beauty.²⁹⁰ The NPPF refers to the National Parks and the Broads Vision and Circular as providing further guidance.²⁹¹ National Parks are not suitable locations for unrestricted housing and general housing targets are not provided.²⁹²

²⁸⁶ Housing Vision (2008) Strategic Housing Market Assessment for the Northern Peninsula.

²⁸⁷ Housing Vision (2012) Strategic Housing Market Assessment: North Devon and Torridge Update, Final Report. Housing Vision (2013) Strategic Housing Market Assessment: West Somerset Update, Final Report. Housing Vision (2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset, Final Report.

²⁸⁸ Housing Vision (January 2015) Northern Peninsula Housing Market Area Strategic Housing Market Assessment (SHMA) Update: Final Report.

²⁸⁹ DCLG (2012) National Planning Policy Framework, London: Department of Communities and Local Government, footnote 9 of paras. 14 & 47. DCLG (2014) Press Release: Councils must protect our precious green belt land [Online] Available: <https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land> (-) DCLG (2012) National Planning Policy Framework, London: Department of Communities and Local Government, paragraph 54

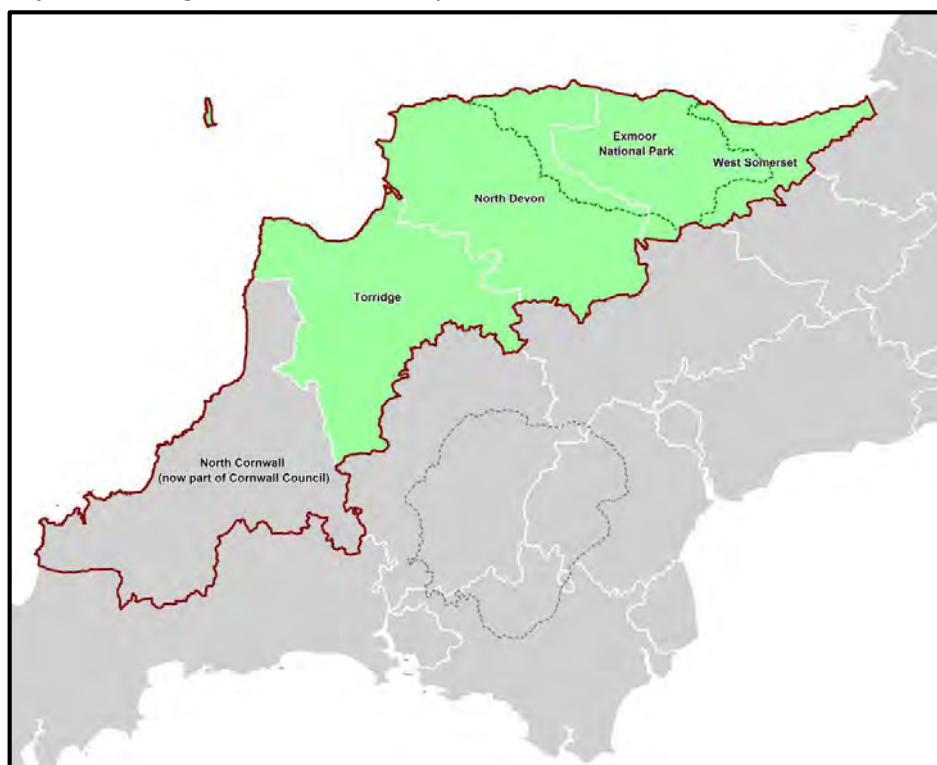
²⁹⁰ Ibid. Paragraph 115.

²⁹¹ DCLG (2012) National Planning Policy Framework, London: Department of Communities and Local Government, para. 115 footnote 25. DCLG (2014) Planning Policy Guidance: How should local authorities support sustainable rural communities? (paragraph 001, Reference ID: 50-001-20140306) [Online] <http://planningguidance.planningportal.gov.uk/blog/guidance/rural-housing/how-should-local-authorities-support-sustainable-rural-communities/> ; and

²⁹² DEFRA (2010) English National Parks and the Broads UK Government Vision and Circular, London: Department for Environment, Food and Rural Affairs, para. 78.

Map 6.1 Exmoor National Park within the Northern Peninsula Housing Market Area

(Map courtesy of Torrridge District Council)



- 6.28 The unadjusted housing figure identified by the Joint SHMA Update for Exmoor National Park based on household projections 2011-31 is 537 units.²⁹³
- 6.29 The figure for the area of North Devon within the National Park is 205 (when adjusted). This includes both affordable and market housing and does not take into account housing completions since 2011/12.²⁹⁴ In considering the evidence for the area, and co-operating with North Devon Council, there is agreement that the delivery of the 205 units of housing, a proportion of which will be affordable, identified for that part of North Devon in Exmoor National Park will be in the North Devon and Torrridge Local Plan to be met in the North Devon area outside the National Park. North Devon Council has taken the view that the additional housing should be located close to and accessible to the National Park's boundaries and that community aspirations for growth identified by Ilfracombe, South Molton and local centres complement this objective.
- 6.30 Taking into account the backlog of affordable housing, there is projected to be an objectively assessed need (OAN) for 306 affordable units in the area of the National Park in West Somerset over the plan period.²⁹⁵
- 6.31 The estimate of local affordable housing need in the National Park 2011-2031 is **306 units**. This does not take into account affordable housing completions since 2011. The approach to housing delivery in this Plan is to work with estimates of housing provision through a rural exceptions approach and without a target to deliver locally needed affordable homes up to the point at which the National Park would be harmed. This approach is appropriate in a remote rural area, given the small size of Exmoor's settlements, landscape sensitivity and capacity, SHLAA supply and is consistent with

²⁹³ Housing Vision (January 2015) Northern Peninsula Housing Market Area Strategic Housing Market Assessment (SHMA) Update: Final Report.

²⁹⁴ Ibid

²⁹⁵ Housing Vision (March 2015) Strategic Housing Market Assessment Update: Exmoor National Park. Final Report, Dulverton: Exmoor National Park Authority.

National Park purposes, national policy and guidance, and the duty to local communities.

ASSESSING THE NEED FOR AFFORDABLE HOUSING IN THE NATIONAL PARK

- 6.32 Feedback from the community ‘Your Future Exmoor’ events demonstrated widespread support for housing that is affordable to local people.²⁹⁶ The National Park Authority, through being based on Exmoor, working at a local level and in partnership with others (including the District Housing Authorities) has a good understanding of the needs of the area and, from 2002, hosted the Rural Housing Project (RHP).
- 6.33 Housing Authority waiting lists have been replaced with a housing register which may not record local connection or may define it differently from planning policies. Households bid for affordable housing as it becomes available. As with the former waiting lists, there remains an issue with rural households registering on the system. This was an important reason for the setting up of the RHP. It carried out rural parish housing need surveys across West Somerset, North Devon, and Exmoor National Park and provided more accurate information affordable need and consistently revealed a local, albeit often small, need, in some cases fewer than three households, for affordable housing in settlements as well as detailed information on size, type and tenure.²⁹⁷
- 6.34 Surveys carried out between 2002 and 2008 identified 262 households in affordable need in the parishes within and split by the National Park boundary while a Park-wide ‘snapshot’ survey to estimate housing need, identified 127 households with a local connection.²⁹⁸ Based on analysis of the data and affordable housing completions, the estimate of housing need for the whole of Exmoor National Park at September 2013 was 90 units.²⁹⁹ The reduction in the number of households assessed as being in need indicates, despite newly arising households, that the strategy has, through the delivery of 83 local need affordable homes 2005/06 to 2013/14, helped to address need in the National Park.
- 6.35 This figure of 90 units should be considered as part of the 306 affordable households identified for West Somerset within the National Park.³⁰⁰ This estimate, within the affordable need figure of 306, is considered helpful in framing the Local Plan housing strategy for the National Park to 2031. However, the housing figures set out in this plan should not be used in determining individual planning applications. Parish surveys may ultimately show a different figure for the remaining period of the Local Plan.
- 6.36 The approach is to provide positively for housing, working through a rural exceptions approach (and without a target) to deliver local needed affordable housing. The method of assessing local housing need by household developed by the Rural Housing Project will continue to inform a needs led approach providing data on need by parish as housing needs change and additional need arises. Proposals in the National Park will only be permitted on a needs led basis where there is evidence of an identified local affordable need (or where proposals for specialist, ‘rural worker’ or ‘extended family’ dwellings are consistent with the policies in this Local Plan) up to the point at which the National Park would be harmed. As well as new provision, some identified need is likely to be met through re-lets of existing affordable housing.

²⁹⁶ Exmoor National Park Authority (2010) Your Future Exmoor’ Feedback Reports (2010). [online: available: <http://www.exmoor-nationalpark.gov.uk/planning/planning-policy/local-development-framework/your-future-exmoor>

²⁹⁷ <http://www.exmoor-nationalpark.gov.uk>

²⁹⁸ Rural Housing Project (2008) Exmoor National Park LDF survey of affordable housing need.

²⁹⁹ Exmoor National Park, West Somerset and North Devon Rural Housing Project: Households in Affordable Housing Need in Exmoor National Park.

³⁰⁰ Housing Vision (2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset, Final Report.

- 6.37 Taking into account the component of the OAN arising in the North Devon part of the National Park that is included in the North Devon and Torridge Local Plan and the estimated of need of 306 affordable homes arising in the West Somerset side of the National Park results in a figure for market housing, arising in the West Somerset side of the National Park, of 174 dwellings 2011-31.
- 6.38 ENPA has taken account of statutory National Park purposes, the local socio-economic duty to National Park communities and constraints which indicate that development should be restricted and that the ability to meet the full need for housing over the plan period is restrained.
- 6.39 The NPPF has changed the definition of exception sites to allow, at the authority's discretion, for small numbers of market homes where essential to enable the delivery of significant additional local needs affordable housing.³⁰¹ In response to the current reductions in national affordable housing grant, the policies in this plan therefore provide for some flexibility on exception sites to consider principal residence housing where it is essential to enable delivery of affordable housing. Such housing may include specialist housing for Exmoor's communities to address the needs of older people and/or other vulnerable members of the community who require care and assistance.
- 6.40 Any 'principal residence' housing which may be permitted in accordance with policies in this plan, including to deliver local need affordable housing, re-use of buildings as dwellings, through subdivision, 'extended family dwellings' or for rural worker dwellings for example may also, indirectly, contribute to the objectively assessed need.³⁰² It is inappropriate to identify a figure for such housing in a National Park and the National Parks Circular is clear that National Parks are not suitable locations for unrestricted housing and general housing targets are not provided for them.³⁰³
- 6.41 Allowing for an element of market ('Principal Residence') housing as a response to the reduction in levels of public housing grant available to registered housing providers and where essential to deliver the affordable housing on exceptions sites will, if permitted, result in additional units set against the housing supply identified in the SHLAA. This would use up the finite supply of suitable housing land at a faster rate – land with the potential to accommodate future local needs affordable housing both in and beyond the period of this Local Plan.
- 6.42 The National Park Authority will ensure robust assessments are used to inform viability in such cases to ensure that development costs and land values are reasonable, commensurate with a rural housing exception site approach. The number of any market ('Principal Residence') homes which may be permitted will be the minimum number needed to deliver the affordable housing.

³⁰¹ DCLG (2012) National Planning Policy Framework, London: DCLG, Para. 54.

³⁰² Housing Vision (January 2015) Northern Peninsula Housing Market Area Strategic Housing Market Assessment (SHMA) Update: Final Report.

³⁰³ DEFRA (2010) English National Parks and the Broads UK Government Vision and Circular, London: Department for Environment, Food and Rural Affairs, para. 78.

ASSESSING AND CONTROLLING AFFORDABILITY

- 6.43 Applying the ‘exceptions’ approach - that local need affordable housing may be permitted, where new housing would not normally be allowed - has the effect of reducing the value of land and buildings to a more reasonable level so that local communities and housing providers can acquire sites and buildings for affordable housing. Within the terms of the local needs housing policies, affordability is judged on a household-by-household basis. Those in need of affordable housing will be households who cannot afford to purchase a home on the open market. All types of tenure can contribute to the stock of affordable housing - housing for rent, shared equity or low-cost owner occupied properties with restrictions to ensure they remain affordable. However, because the National Park Authority cannot directly control tenure through planning conditions or agreements, different needs will be matched to the appropriate type of property.
- 6.44 Because of low income levels, most local households in housing need will need rented property controlled by a Registered Provider or other landlord. Evidence of income and affordable rent levels indicates that to be truly affordable, rent will need to be based on social rent levels.
- 6.45 Custom/self-build is a method of achieving affordable housing which may be possible for those on incomes higher than the lowest incomes, but who are not able to afford a home on the open market. This is particularly aimed at benefiting young first time buyers to enable them to remain in their communities. In this way the Government’s objectives for starter homes for younger people are applied in the plan appropriately in a National Park context since HC-S1 and policies for conversions and new build housing in settlements apply to brownfield as well as greenfield land. Experience of implementing the housing policies in the 2005 Plan has shown that there may be opportunities for Housing Providers to provide serviced self-build plots as part of a larger scheme. ENPA will work with partners, including local communities, who may wish to consider ways in which households can be assisted to provide homes, including site preparation and provision of services. There is growing interest in the potential for community land trusts to initiate affordable housing schemes and this approach may be able to achieve mixed schemes with rented affordable housing, potentially managed by Registered Providers and custom/self-build housing to address a range of needs within a community.
- 6.46 ENPA will consider low cost shared ownership housing only if there is a demonstrated need for it. Evidence indicates that, when both the rent and the mortgage element is taken into account, it may be unaffordable for all but a very few households.
- 6.47 Taking account of the significant gap between open market private rents and open market house prices in the National Park and many local incomes, affordability of owner occupied dwellings will be achieved through both:
- (i) The local occupancy tie, which will reduce house values and
 - (ii) Keeping the size of properties as small as possible commensurate with the needs of the intended household, and recognising the role of the property to meet future needs of the community for affordable housing. Individual privately or owner occupied dwellings should therefore have a net floorspace of 90 square metres (sqm) or less unless it is housing controlled through a Registered Provider (Policy HC-S2: A Balanced Local Housing Stock).
- 6.48 The intention of the policies is to provide opportunities for people to stay in their communities, the overall costs of delivery of affordable housing, including those promoted by private developers for sale, need nevertheless to be realistic, given local income levels in case there is a need to sell. For this reason they will be closely scrutinised to ensure that the dwellings will be genuinely affordable in relation to identified needs, land value, site development costs and local incomes/mortgage

availability. This should be borne in mind by applicants and developers so that the price they pay for the site/land, building, construction and finishing reflects its reduced market value. In addition to limiting size and type, the National Park Authority will require demonstration of the intent to build a house (or houses) in the affordable range. Applicants will be expected to provide evidence, including for land and construction costs, with the application and an independent financial appraisal of the development, through the district valuer may be required to show that the resulting dwellings will be genuinely affordable.

- 6.49 At the time of drafting, new housing schemes built by Registered Providers and which receive public housing grant through the HCA must be rented out at 'Affordable Rents' which are pegged at up to 80% of open market rental levels. These may not be affordable to many local households in housing need. Even where the HCA agrees to lower rents, extra grant is not currently available. Anyone building housing to rent out should set the rent at or below the current "Affordable Rent" used by Registered Providers building in the National Park. In all cases, the National Park Authority will work with applicants and seek the advice of the District Housing Authorities on a case by case basis to consider the scheme as a whole and to assess whether potential rental levels are likely to be genuinely affordable to households in local housing need. Evidence of income and affordable rent levels indicates that to be truly affordable rent is likely to be lower and based on social rent levels.
- 6.50 The National Park Authority considers that, due to rapid changes in the housing market, it is challenging to establish a meaningful relationship between incomes and house prices. However, by virtue of the limitations on size, type and occupancy, housing provided through the Plan policies will always remain (all other things being equal) **more affordable** than they would otherwise be.
- 6.51 More affordable housing can also be available through the retention of existing suitable properties within the wider housing stock. Policies provide for the subdivision of existing open market dwellings to create smaller units of accommodation. Policies will control the size of extensions, to ensure a range of dwellings, including smaller dwellings remain available, and permit the replacement of existing occupancy conditions with local occupancy ties.

STRATEGIC POLICY: HOUSING

- 6.52 The strategic policy HC-S1: Housing carries forward the policy approach to housing in Exmoor National Park that it is not appropriate to permit new housing simply in response to the significant external demand for open market housing. Instead, within the National Park, policies provide for new housing as an exception to normal policies of restraint.
- 6.53 The limited number of opportunities for new housing development emphasises the importance of concentrating on the identified local need for affordable (including intermediate) housing within the National Park. Addressing the local need for affordable housing helps those who cannot compete in the open housing market. It is a justifiable reason for new housing provided there is no harm to the National Park and its special qualities. It can also help people who move away from the National Park (e.g. for further or higher education, early careers and service families) to return within a reasonable period and counteract, to some degree, the overall trend towards an ageing population. As a remote area with all settlements defined as rural, the use of the rural exception sites approach for affordable housing to meet local needs is appropriate for Exmoor National Park. The exceptions approach does not define or allocate sites in a plan. HC-S1 makes it clear that the principal community identified need is for affordable housing with local occupancy ties.

- 6.54 Policy HC-S1 also makes provision for the identified local housing needs of rural land based workers (linking to policies for housing in the open countryside through HC-D7 on conversions, HC-D8 for new build dwellings, HC-D9 and HC-D10 Succession Farming); older people and/or other vulnerable members of the community in need of specialist housing where adequate care and assistance cannot be provided within the existing housing stock (Policy HC-D3) and 'extended families' through the reuse of an existing traditional building (Policy HC-D4).
- 6.55 Prioritising what is most needed by Exmoor's communities is important because evidence demonstrates how few greenfield housing sites there are in the National Park's settlements.³⁰⁴ In addressing local housing needs, maximum use should therefore be made of the existing stock of accommodation, buildings and previously developed land/buildings. This should help to minimise the level of greenfield housing development within the National Park and ensure that, in the longer term beyond the period of this plan, there will still be some suitable housing sites in settlements to help meet the needs of National Park communities.
- 6.56 The special measures necessary in protected landscapes together with experience of the ways in which housing providers and others such as local housing trusts can contribute to the local need for affordable housing, suggest that affordable homes do not always need to be newly built. There is potential to exercise a 'local preference' when those existing affordable homes, which are not subject to a local needs occupancy tie, become available for re-letting and this approach has been applied in the area by some Registered Housing Providers. Additionally, both the number and proportion of affordable homes might sometimes be increased by buying suitable existing open market homes and creating new units through subdivision. This would be compatible with National Park purposes and landscape conservation as it would reduce the overall number of households in housing need and the number of new build homes and conversions needed. The purchase of existing properties would offer an opportunity to improve their energy efficiency and also benefit places where there is no capacity to build new homes. Since planning permission is unlikely to be required, housing providers and authorities would exercise their own discretion about the eligibility of occupants. The National Park Authority will work with its partners to further explore the potential for approaches and the benefits that they might bring over time.
- 6.57 The National Park Authority will work in partnership to help implement housing policies: delivering housing for the benefit of local communities while conserving and enhancing the National Park. Delivery will be monitored and reported. This will enable the National Park Authority to openly review the effectiveness of policy; taking into account changing circumstances in housing finance and delivery and the capacity to accommodate development in order to secure the necessary amounts of locally needed affordable housing. It will also bring forward Supplementary Planning Documents and legal agreements to provide a comprehensive framework within which local and affordable and housing can be secured in perpetuity.
- 6.58 Reference to 'Dwelling', 'Housing' or 'Accommodation' within the following policies includes flats and self-contained annexes.

³⁰⁴ Bryan, P. (2013) Exmoor National Park Landscape Sensitivity Study, Dulverton, ENPA - Capacity for 333 units.

HC-S1: HOUSING

- 1. The purpose of housing development will be to address the housing needs of local communities. The principal community identified need is for affordable housing with local occupancy ties. Exceptionally, new housing will be acceptable where it addresses an identified local housing need for:**
 - a) affordable homes that remain affordable in perpetuity and which will be occupied by local persons in proven housing need in accordance with the local occupancy definition in HC-S3;**
 - b) rural workers in agriculture, forestry or other rural land based enterprises with a proven essential, functional need in accordance with HC-D7 or HC-D8 and HC-D9 or to enable succession farming on established farm businesses in accordance with HC-D7 or HC-D8 and HC-D10;**
 - c) specialist housing for older people and other vulnerable members of the community, in accordance with HC-D3 which will be occupied by local persons in perpetuity; or**
 - d) an “extended family dwelling”, in accordance with HC-D4, which will be occupied by local persons in perpetuity.**
- 2. Consistent with an exceptions approach to housing, provision will not be made for housing solely to meet open market demand and housing land will not be allocated in the development plan.**
- 3. ‘Principal residence’ market housing will only be considered where it is essential to deliver an identified need for local need affordable housing and in accordance with policy HC-S4.**
- 4. ‘Principal residence’ market housing will only be considered as long as government guidance on planning obligations relating to thresholds for affordable housing is extant:**
 - a) through the change of use of existing buildings or the redevelopment of a ‘vacant building’ (including provisions for commuted sums towards local needs affordable housing in the National Park); and**
 - b) only within Local Service Centres and Villages.**

If the guidance changes, this provision will no longer apply and 100% affordable housing will be sought.

Text Box

Government guidance on planning obligations, inserted into the PPG, is in force at the time of the drafting of this Local Plan. It sets out minimum thresholds for the size of housing developments where affordable housing can be sought and introduces a vacant buildings credit. The thresholds for National Parks can be set at 5 dwellings or fewer. The guidance is clear that rural exceptions sites are excluded from this change.

While this guidance is in force only, as a variation to HC-D1, applicants will be able to change the use of existing non-residential buildings or redevelop vacant buildings to dwellings in Local Service Centres or Villages (see Policy GP3) In such cases the following thresholds will apply:

where the existing building is only able to accommodate up to 5-dwelling units or fewer, and/or have a maximum combined gross floorspace not exceeding 500m²; or

where the existing building is only able to accommodate between 6 and 10 dwelling units, and/or have a maximum combined gross floorspace not exceeding 1000m². From units 6-10, the National Park Authority will expect that a financial contribution will be provided towards the provision of local needs affordable housing in the National Park.

where the existing building is able to accommodate 11 dwelling units (or more), and/or has a maximum combined gross floorspace greater than 1000m², the National Park Authority will expect any housing to be on site and for units 11 and above to meet a local affordable need in accordance with Policy HC-D1.

The guidance also applies to the change of use or redevelopment of non-residential vacant buildings to housing under the 'vacant buildings credit'. The guidance specifies that the gross floorspace of housing achieved through the demolition of an existing vacant building and its redevelopment for housing should be no greater than the existing gross floorspace of the existing vacant buildings. Housing which would exceed the gross floorspace will be expected to address an identified local need (clause 1 of HC-D2);

In all these cases, new housing whether through the change of use of an existing building or the redevelopment of a vacant building will be expected to be principal residence housing (see HC-S4) and be in line with HC-S2. Changes of use to housing should also accord with CE-S5 and conditions will be attached to planning permissions to remove permitted development rights (see HC-S2 and CE-S5).

A BALANCED LOCAL HOUSING STOCK

Size and Type of Housing

- 6.59 Based on evidence on the National Park's existing housing stock, to create more balanced communities and address the needs of existing and future households, there is a need for smaller and more affordable dwellings, such as terraces and flats and for tenures of new housing that are aligned to identified needs. Following an exceptions site approach, the need for the mix of dwellings and the viability of a proposal, will be assessed on a case-by-case basis. The Exmoor Housing SPD will provide further guidance.
- 6.60 The housing stock as a whole should provide a range of accommodation sizes, types and tenures to meet the needs of all sections of the local community. This plan necessarily focuses on new development which is a small part of the National Park's existing housing stock. Policy HC-S2 aims to ensure, in terms of size, type and tenure that new housing permitted in the National Park will result in a better mix of dwellings and that it contributes to that which is needed locally. It is intended to help achieve more balanced, living and working communities by giving those in housing need, including local young people and those with specialist housing needs, the opportunity to stay in

their community and help maintain the viability of important services, such as schools. In delivering affordable homes, housing providers have to consider a variety and range of needs for different sizes, types and tenure of home (such as those for local workers, specialist housing for older people and other vulnerable members of the community and those with care needs, single people or young families). This is an important part of assessing need and housing providers and developers of two or more affordable homes, will need to show that they have taken into account the housing needs of the community. Single properties will tend to be from private developers or self-builders aiming to satisfy a particular individual (though proven) need.

- 6.61 Any market (principal residence) housing developments will also need to reflect the needs of the area for sizes and types of homes to help create a more balanced housing stock. Dwellings should be no larger than that needed in the area given the above average proportion of larger and detached dwellings. However, the policy requires that such housing should also meet a good standard of floorspace consistent with the forthcoming Exmoor Housing SPD. This will help to avoid discrepancies between the floorspace standards required by the HCA for affordable housing and that of any principal residence housing, which may be permitted to deliver it. The need for specialist housing for older people and vulnerable members of the community should also be considered and proposals should accord with Policy HC-D3. Specialist housing will always need to either itself meet an identified local need for affordable housing or, where there is a proven need for affordable homes and there is an identified need for specialist housing, part or all of that 'principal residence' housing required to cross subsidise the affordable housing will be specialist housing with a local occupancy tie.
- 6.62 Individual privately or owner occupied local need dwellings should have a net floorspace of 90sqm or less unless it is housing controlled through a Registered Provider. The 'net internal floor area' is the area on one or more floors enclosed by the perimeter walls of a dwelling and is measured to the opposing unfinished faces. It includes the area occupied by partitions, the area taken up on each floor by any staircase, the area of any chimney breast or flue, and the area of any external WC. It excludes the floor area of any general store, dustbin store, fuel store, garage or balcony; any area in rooms with sloping ceilings to the extent that the height of the ceiling does not exceed 1.5m; and any lobby/porch open to the air.
- 6.63 The National Park Authority will consider local need dwellings larger than 90sqm floorspace only where they are controlled through a Registered Provider (including owner occupied dwellings controlled through a Registered Provider), and where the identified need is for a larger dwelling. The size of the dwelling should be based on the HCA Scheme Development Standards. The National Park Authority intends to produce a supplementary planning document to provide advice on addressing the local need for affordable housing, which will include floorspace guidelines. Terraced and modest semi-detached houses and flats will be expected in the majority of cases.
- 6.64 The fundamental objective under these housing policies is to ensure that those new affordable dwellings, which are permitted, remain more affordable to meet the community's needs in perpetuity with new privately/ owner-occupied local need affordable, housing restricted to 90sqm net floorspace. The size of other dwellings including specialist housing 'extended family', succession farm dwellings is also limited to 90sqm. The size of rural land based worker dwellings should be in accordance with Policy HC-D9.
- 6.65 Permitted development rights granted by the Town and Country Planning (General Permitted Development) Order 2015, will be removed and, where the net internal floorspace limitation will not be exceeded this will enable the National Park Authority to assess the impact of increasing the size and affordability of any extensions on these

dwellings on an individual basis. Applications for extensions will be assessed against Policy HC-D15.

- 6.66 The principal community need identified by Policy HC-S1 is housing affordable to local people in perpetuity. Policy HC-S3 ensures that this will be secured through requiring applicants to enter into a legal agreement (in the form of a planning obligation under Section 106 of the Town and Country Planning Act 1990). The National Park Authority considers that obligations provide greater certainty in securing housing for local needs and ensures that in any change of occupation, the new occupant is aware of the restriction. In respect of the conversion of buildings, the additional reason for withdrawing permitted development rights is to protect the character and appearance of the building.
- 6.67 New housing development will be expected to be designed to enable it to be adapted to the needs of people over their lifetime. Improvements to existing homes will also be encouraged. This should improve their suitability so that as their needs change, people can remain in their own homes for longer. A Housing Supplementary Planning Document will provide guidance for applicants.

HC-S2 A BALANCED LOCAL HOUSING STOCK

- 1. All new residential development will contribute towards the creation of sustainable, balanced, inclusive communities by providing housing that addresses the local needs of present and future generations, through:**
 - a) Having regard to the existing housing stock in the locality, ensuring that new housing provision will, through the mix of new dwellings in terms of size, type and tenure, meet the needs of Exmoor's communities and offer a good standard of accommodation by being constructed to be neither too large nor too small and using flexible standards that enable dwellings to be adapted to the needs of people over their lifetime.**
 - b) For local need affordable dwellings permitted under HC-S1 and HC-D1, or HC-D2, HC-D5, HC-D6, or HC-D7, the dwelling(s) will be affordable by size and type to local people and will remain so in perpetuity. For private owner occupied local need dwellings, specialist housing, extended family dwellings and 'succession farm dwellings', the net floorspace will be 90 square metres or less.**
 - c) Where permission is granted for dwellings of up to 90sqm, including those created through subdivisions, a condition will be attached removing permitted development rights in respect of extensions to ensure that dwellings do not exceed 90sqm in size.**
- 2. Where permission is granted for employment uses as part of a proposal, a condition may be attached tying the occupation of the dwelling to the operation of the business.**

LOCAL OCCUPANCY CRITERIA

- 6.68 In meeting National Park statutory purposes, the legal duty refers to local social or economic wellbeing. Broadly, and in the context of housing provision, 'social' relates to family and community ties established over a period of time and 'economic' to ensuring the local rural workforce has access to adequate housing. The definition of 'local' within Policy HC-S3 below incorporates both these aspects.
- 6.69 Before new affordable housing can be considered, the local community need for the new dwelling(s) (including conversions) must be established. The distinction between 'demand' and 'need' has to be recognised. The assessment of community need will be through an up-to-date local housing needs survey based on the process and survey forms established by the Rural Housing Project and prepared by or in consultation with the district council (as local housing authority) and in consultation with the Town/Parish Council(s). Private surveys, without the assistance of the Rural Housing Enabler or a Registered Provider or District Council, are not acceptable. Proof of an individual's need within a community will be established through a detailed questionnaire. In assessing proposals for a single local needs dwelling, the extent to which it forms part of a wider community need including any up to date local housing need survey and the likelihood of the type, size and location of the property meeting an ongoing community need for housing if the individual subsequently moves out of the property will be scrutinised. There needs to be evidence that an ongoing need exists before permission is granted. In each case the National Park Authority will carefully examine the survey results to ensure that a genuine need exists for the number, size, type and tenure of dwellings proposed.
- 6.70 In order to comply with the Local Plan strategy to minimise new build housing on greenfield land, before applying for a new dwelling or housing, an individual or group will be expected to have examined the availability of properties and existing buildings in their own and adjoining Parishes and the locality. Where existing property of a suitable price, size and type is, or is likely to become, available, and the existing owner has indicated a willingness to sell, or where there are opportunities for extensions and/or subdivision to create smaller more affordable units of accommodation, new build housing is unlikely to be permitted.
- 6.71 Plan policies (GP1 National Park Purposes and Sustainable Development; GP4 The Efficient Use of Land and Buildings and CE-S6 Design and Sustainable Construction Principles), therefore require that applicants demonstrate that:
- a) The need cannot be met within the existing housing stock or already with planning permission including through the subdivision/appropriate extension of existing dwellings.
 - b) Where this cannot be achieved, from sites/buildings within the development boundary/well related to existing buildings.
 - c) There are no suitable brownfield sites that can reasonably be developed in place of a proposal on greenfield land.
 - d) Best use is made of land in terms of the density of development consistent with Partnership Plan and Local Plan objectives to ensure the design of all new housing development respects the character of its setting, reinforces the identity of its settlement, the local vernacular architecture and incorporates sustainable development principles.
- 6.72 In respect of site selection, justification of a local need does not itself outweigh other policies of conserving the National Park, and these will have to be taken into account in judging any particular proposal. The policies aim to provide most new housing in settlements.

- 6.73 Where Parishes do not have an identified settlement (or suitable site within one), the search for a site for a local needs house(s) will be directed towards an adjoining Parish. Where Parishes are split by the National Park boundary and the settlement lies outside the National Park, the need for housing should be met in that part of the settlement lying outside the National Park and in accordance with the relevant District Council's planning policies. Where parishes are split by the National Park boundary and there is no identified settlement outside the National Park in that parish, then residents who otherwise meet the requirements of HC-S3, including one or more local connection criteria, may be considered for local needs housing in the National Park. For housing proposals in rural communities in the open countryside, only those with a local connection to that parish will be considered to comply with the policy. Where a rural community in the National Park is in a parish split by the National Park boundary, only those households with a residency in that part of the parish lying within the National Park will be considered to comply with the local connection.
- 6.74 Residential conversions in settlements, as well as in the open countryside, will be expected to contribute to the stock of local needs housing. For larger buildings, affordability will be achieved through creating more than one unit. This will need to be done sympathetically to help retain the building's original character. Conversions providing employment space alongside a dwelling(s) are also positively encouraged. Registered Providers can play a valuable role in sub-dividing existing properties within settlements to create smaller units of affordable accommodation.
- 6.75 For the purposes of the policies within this Local Plan 'local needs' housing is defined as housing which is intended to meet the needs of the local community. Local community includes those people with strong local connections with a Parish or adjoining Parish(es), defined as a minimum period of 10 years permanent and continuous residency. This includes people who have previously lived within the Parish(es) for 10 years or more and who want to return to their community. 10 in the last 30 years means they can have lived away for up to 20 years. This may apply to service families with a member(s) of the household who has lived away as a result of serving in the armed forces, who wishes to return and who is in affordable housing need.
- 6.76 The local occupancy definition also includes those with a ten year connection to the National Park as a whole but who do not qualify as having lived for 10 years or more in any one parish/adjoining parish. In such cases, a strong connection to a given parish will need to be demonstrated.
- 6.77 As well as residency requirements, the definition of local connection includes 'Exmoor Workers' and people who need to live close to their place of work within the Parish(es). Evidence from the applicant on the security of their jobs and the value of their work to the National Park and its communities, will be assessed. The National Park Authority intends to produce a supplementary planning document to provide guidance on application of this clause of the policy including what constitutes an 'Exmoor worker'.
- 6.78 All applications for new dwellings will be scrutinised thoroughly to ensure that intended occupants are both 'local' and in 'need' of such accommodation. Individual applications will be assessed as part of the need of the community as a whole, in line with Government policy, and evidence of the circumstances of the intended occupier in terms of their compliance with clauses 1(a) to (e) of Policy HC-S3 below, and that they have searched for suitable accommodation in the locality. This will ensure decisions are applied in a fair and consistent way, and that all new housing permitted under these policies remains available to meet the needs of the local community in perpetuity.

- 6.79 Local need includes those people with strong local connections, but who cannot afford to buy or rent existing housing in the locality. 'Locality' includes the Parish, adjoining Parishes and an area within a reasonable travelling distance of their place of work and local services.
- 6.80 ENPA will consult the District Council Housing Officer and work with the Rural Housing Enabler to obtain assessments of whether applicants' are in affordable housing need including their ability to afford existing housing and whether they are currently in unsuitable housing.
- 6.81 Local people with access to existing suitable accommodation with a secure tenancy or incomes/ savings to enable them to afford to buy/ rent suitable accommodation in the locality will not meet the requirements of Policies HC-S1 (Housing) or HC-S3 below. In assessing need, account will be taken of any properties owned, or previously sold or otherwise disposed of, by the intended occupants of the new accommodation to avoid any abuse of the policy. In respect of claims of a relative's care needs, medical evidence will be required.
- 6.82 Justification for the need for new affordable housing will only be accepted on the basis of evidence of those households meeting the requirements of HC-S3 clauses a) to e).
- 6.83 The policy includes provisions or cascades in the event that a local needs affordable home becomes vacant. In the first instance only those with a local connection as set out in 1 a) to e) of Policy HC-S3 will qualify. However where there are no-local persons meeting criteria 1 a) to e), the policy allows that local persons meeting the other policy requirements but with a minimum period of 5 years permanent and continuous residence in that parish or an adjoining parish may qualify.
- 6.84 Where there are no local persons meeting the above requirements, the planning obligation will allow that the cascade can include those people in affordable housing need living in the relevant district council area of the National Park or the National Park as a whole.
- 6.85 Ultimately the cascade can go as far as the National Park boundary for privately owned dwellings. Occupants living outside the National Park will only be considered where they meet the local definition in clauses 1 c), d) or e) of Policy HC-S3 i.e. those persons with a previous residence of 10 or more years in the last 20 years; or needing to move into the National Park to live close to a local person for age / medical reasons or Exmoor workers and those needing to live close to their place of work.
- 6.86 For housing owned or controlled by a Registered Provider, (including Housing Associations) where there are no local persons meeting the above requirements, the cascade will then go as far as the district council area outside the National Park to allow persons with strong local ties to the remaining district council area outside the National Park, to occupy the dwellings. This approach provides sufficient flexibility to ensure that an occupier can be found though with a connection to the area while ensuring that private/owner occupied dwellings remain more affordable.

HC-S3 LOCAL OCCUPANCY CRITERIA

- 1. New local need affordable housing will be occupied by a person(s) (and their dependents) with a proven housing need who cannot afford (to rent or buy) accommodation in the locality and who meets one or more of the following definitions:**
 - a) has a minimum period of 10 years permanent residence in the parish or an adjoining parish and who is forming an independent household or is currently homeless or living in otherwise unsatisfactory accommodation;**
 - b) has a minimum period of a total of 10 years permanent residence within parishes within the National Park and who can demonstrate a clear link with a parish or its adjoining parish and is forming an independent household or is currently homeless or living in otherwise unsatisfactory accommodation;**
 - c) is not now resident in the parish or an adjoining parish but with a local connection with the parish including a period of permanent residence of 10 years or more within the last 30 years;**
 - d) has an essential need to live close to another person who has a minimum of 10 years permanent and continuous residence in the parish or an adjoining parish, the essential need arising from proven age or medical reasons; or**
 - e) needs to live close to their place of work or meets the requirements of an Exmoor worker in the parish or an adjoining parish.**
- 2. A planning obligation will be secured to ensure that occupancy of the dwelling(s) is confined to persons in local housing need in perpetuity.**
- 3. The definition of local need shall initially be based on criteria 1 above. Where there are no local people meeting criteria 1 and properties are vacant, a cascade approach will apply and the planning obligation will allow other local persons with a minimum period of 5 years permanent and continuous residence in the parish or an adjoining parish to qualify. Where properties become vacant and there is no-one meeting criteria 1 above, or the 5 year residency qualification, the final stage of the cascade will allow:**
 - a) dwelling(s) owned or controlled by a registered provider (including housing associations) to be occupied by other local persons with strong local ties to the remaining District Council area outside the National Park; or**
 - b) will ensure for privately owned dwellings, that the occupancy cascade will not go wider than the National Park area unless for those subsequent occupants who qualify under clauses 1(c), 1(d) or 1(e) above.**

PRINCIPAL RESIDENCE HOUSING

6.87 Principal residence housing is a form of market housing controlled by a mechanism which ensures it can be lived in by anyone but only as their principal residence. The aim of this mechanism is to prevent any new market housing being used as a second or holiday home given the existing high percentage of homes in the National Park with no usual residents (19%) and its impact on the social well-being of a number of communities where the overall proportion may be significantly higher e.g. Lynton & Lynmouth where 28.5% of household spaces have no usual residents.³⁰⁵ All new housing in the National Park should be affordable housing to meet local needs. Principal residence housing will therefore only be permitted in very specific circumstances where it can be demonstrated to be essential to enable the delivery of affordable housing schemes in accordance with Policies HC-D1 (Conversions to Housing in Settlements) or HC-D2 (New Build Housing in Settlements). 'Principal Residence' housing will also apply to any new dwelling units created through the subdivision of existing dwellings (HC-D14) and the conversion of hotels/guesthouses to accommodation and in accordance with the tests set out in Policy RT-D3 (Safeguarding Serviced Accommodation) and Policy HC-D6 (The Change of Use of Serviced Accommodation to Housing).

HC-S4 PRINCIPAL RESIDENCE HOUSING

- 1. Any market housing will be 'principal residence' housing and will only be permitted, through the change of use of non-residential buildings to housing in settlements, and/or required to enable the delivery of affordable housing to meet local needs in accordance with policy HC-S1 (Housing), clause 3 and in accordance with:**
 - a) HC-D1 (conversions to dwellings in settlements);**
 - b) HC-D2 (new build dwellings in settlements);**
 - c) RT-D3 (safeguarding serviced accommodation) and HC-D6 (the change of use of serviced accommodation to housing); or**
 - d) HC-D14 (subdivisions of existing dwellings).**

HOUSING IN SETTLEMENTS

6.88 The capacity of Exmoor's settlements to accommodate further housing has been investigated through a detailed landscape sensitivity study. It shows that, on greenfield land, only 333 new build houses could potentially be provided within the settlements identified in the 2005 Local Plan, without harming the landscape of the National Park. This figure does not include opportunities arising from redevelopments, brownfield land and conversions of existing buildings. However, neither does it include other issues which may mean that remaining sites are not suitable for housing development. This demonstrates the importance of making maximum use of the existing stock of accommodation, buildings and previously developed land/buildings to reduce the level of greenfield housing development within the National Park and ensure that, in the longer term, there will still be some suitable housing sites in settlements to help meet the needs of the National Park's communities. The approach in this plan seeks to provide for housing to address the needs of Exmoor's communities with the priority being local needs affordable housing by ensuring that most housing and all new build

³⁰⁵ Office for National Statistics (2011) Census 2011. London: The Stationery Office- compared to 4.3% for England.

housing is in settlements (other than that new build for the proven needs for land based workers) helping to sustain them over the long term. The spatial strategy is set out in Section 3 of this plan at Policy GP3.

- 6.89 The Government wants to enable more people to build their own home.³⁰⁶ The National Park Authority sees custom/self-build as a means of people meeting their own need for affordable housing although the majority of households in need of housing will, due to local incomes, need rented housing at social or near social rent levels. The National Park Authority has established a self-build register of people interested in self-build or custom build as part of a joint 'Right to Build' Vanguard Project with Dartmoor National Park Authority.³⁰⁷ The register will be used to help identify and address the local need for affordable housing of people who work and/or who have longstanding residency in the National Park in line with Policy HC-S1 and other housing policies in this plan. Some sites have been assessed through the SHLAA process, and will be considered for self-build schemes. As part of the Vanguard project, landowners were invited to suggest sites or buildings, which are suitable for new build self-build housing or for housing through conversions. These will be within or adjoining the settlements in the National Park. These sites might be small pieces of land/buildings for a single dwelling, or larger ones for a number of homes. In this way the Government's starter home initiative will be applied appropriately in the context of a National Park through a rural exceptions site approach where new affordable housing with a local tie may be permitted including on brownfield sites consistent with other Plan policies. Local need affordable custom/self-build housing may also be allowed outside settlements in accordance with Policy HC-D5.
- 6.90 Planning policies continue to prioritise affordable housing, but, in Local Service Centres and Villages, an element of "Principal Residence" market housing may be considered where this is essential to facilitate the provision of needed affordable housing. Where there is evidence of need for custom/self-build housing and/or specialist housing, the National Park Authority, in discussion with the relevant housing authority, will seek proposals to provide for it, either as part of the affordable local needs housing itself (including custom/self-build plots) or where it is proven to be required to deliver the affordable housing, as 'Principal Residence' housing. Land values will need to be kept to affordable housing levels for all plots. The only other circumstances in which Principal Residence housing may be permitted is where it is through the redevelopment of a 'Vacant Building(s)' in accordance with HC-D2 clause 2 b) and HC-S1 clause 4 only or through their change of use. Agricultural buildings and previously developed land without buildings do not come within the definition of 'Vacant Buildings'.

CONVERSIONS TO DWELLINGS IN SETTLEMENTS

- 6.91 Policy HC-D1 provides for the change of use of existing buildings to housing in settlements where they are well related to existing buildings and the proposal conserves or enhances the character of the settlement (see Policy CE-S1). Proposals must also accord with Policy CE-S5 on the change of use of existing buildings.

³⁰⁶ DCLG (2014) Planning Policy Guidance: Housing and economic development needs-assessment [Online] Available: <http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-development-needs-assessments/methodology-assessing-housing-need/> Paragraph: 021 Reference ID: 2a-021-20150326

³⁰⁷ Exmoor National Park Authority (2014) Self-build: Right to Build Vanguard [Online] Available: <http://www.exmoor-nationalpark.gov.uk/>

- 6.92 All housing must meet an identified local need for affordable housing and be lived in by people who meet the requirements of the local occupancy criteria in perpetuity. This will be secured through a planning obligation (Policy HC-S3). All such housing will have a floorspace of 90sqm or less in accordance with Policy HC-S2.
- 6.93 A key factor in achieving affordable housing is to obtain buildings at the lowest possible value taking account of existing use value, such that it is possible for housing associations, community land trusts and local households to acquire it for the purposes of affordable housing. The impact of the housing policies within this Local Plan, based on the rural 'exceptions' approach, should be to keep building development values lower than would otherwise be the case. Proposals which include 'Principal Residence' housing to help deliver affordable housing in Local Service Centres or Villages, will be scrutinised through 'an open book' approach to ensure it can be demonstrated that it is essential for the viability of the scheme because it replaces current reductions in public housing grant to Registered Providers rather than increases building value, and that there are no alternative sources of funding but cross subsidy (through 'Principal Residence' housing). Higher building values would impact on scheme viability and in the longer term would result in a greater number of houses to deliver the affordable using up suitable existing buildings more quickly, so increasing pressure on greenfield sites and reducing the ability to deliver affordable housing for local needs in the National Park in the longer term.
- 6.94 For clause 3 of Policy HC-D1, buildings which can only accommodate one dwelling unit will need to be affordable housing. Whether a building is able to accommodate more than one dwelling unit, will be judged on the basis of a maximum floorspace of 90sqm or less.
- 6.95 Where a scheme would provide more affordable homes than are needed in the parish and the adjacent parishes, based on robust assessments of housing need as set out in the preamble to local occupancy criteria, a financial contribution will be required towards affordable housing needed elsewhere in the National Park in accordance with Policy GP5.
- 6.96 Where there is evidence of need for specialist housing, proposals for the change of use of existing buildings to housing should provide for it in accordance with HC-D3, whether through affordable local needs housing or where it is proven to be required to deliver the affordable housing.
- 6.97 Policies provide for Extended Family Dwellings' in settlements through the change of use of an existing traditional building and where they otherwise accord with Policy HC-D4 including being within the curtilage of, and in close association with, an existing dwelling and where the occupants meet the requirements of that Policy.
- 6.98 Proposals for the change of use of hotels to dwelling(s) within settlements should accord with the tests in Policy HC-D1 below.
- 6.99 Where permission is granted condition(s) will be attached removing permitted development rights in respect of extensions to local need affordable dwellings and dwellings of up to 90sqm in accordance with HC-S2 to ensure that the dwellings remain more affordable and contribute to a balanced local housing stock, and for alterations to ensure that the character of the building is conserved in accordance with Policy CE-S5.
- 6.100 The National Park Authority intends to provide further guidance in a supplementary planning document on the implementation of its housing policies.

HC-D1 CONVERSIONS TO DWELLINGS IN SETTLEMENTS

- 1. Within the named settlements, the change of use of a non-residential building(s) to a dwelling(s) will be permitted where:**
 - a) the building is well related to existing buildings and the proposal conserves or enhances the character of the settlement;**
 - b) the proposal meets the requirements of CE-S5;**
 - c) there is a proven local need for the dwelling(s) which will meet an affordable local need, and the intended occupants meet the requirements of the local need occupancy criteria which will be secured in perpetuity through a planning obligation in accordance with HC-S3; and**
 - d) the dwelling(s) will be affordable by size and type to local people and will remain so in perpetuity in accordance with HC-S2.**
- 2. Proposals for 'extended family dwellings, will accord with criteria 1 (a) and (b) above, be occupied by a person who meets the definition of 'extended family' and be in accordance with HC-D4.**
- 3. The intention will remain the provision of 100% affordable housing to meet an identified local need and the change of use of a non-residential building to residential will address an identified local affordable need unless:**
 - a) it is an element of principal residence market housing in accordance with HC-S4;**
 - b) it is clearly and robustly demonstrated that it is required to enable delivery of affordable housing which cannot be made financially viable without it;**
 - c) the building is able to accommodate more than one dwelling unit;**
 - d) it is within a Local Service Centre or a Village (GP3);**
 - e) it is the minimum number of principal residence market houses required to support the delivery of the required affordable housing to maximise the proportion of affordable homes within viability constraints;**
 - f) the affordable dwellings will be occupied by a person(s) with a proven housing need in accordance with HC-S3;**
 - g) in terms of size and type, the mix of principal residence market housing is in accordance with Policy HC-S2;**
 - h) the affordable housing and principal residence market housing will be indistinguishable and will be fully integrated on the development site; and**
 - i) the affordable housing will be provided broadly in-step with the principal residence housing as development progresses; or**
 - j) it is 'Principal Residence' housing in accordance with HC-S1 clause 4.**
- 4. The National Park Authority will ensure that, whether through a single permission or incremental permissions, the number of affordable dwellings created is that which would have been required if the scheme had been constructed as a single development having regard to the planning unit and previous permissions since the adoption of the March 2005 Local Plan. In the case of the creation of one or more dwellings from a single previous planning unit (whether at once or over a period of time), the development should contribute the maximum number of local need affordable homes consistent with this policy or in accordance with HC-S1, clause 4.**
- 5. Where there is reason to believe that the proposal is formulated with a view to circumventing or mitigating affordable housing requirements, including where the National Park Authority considers that a building is able to accommodate more than one dwelling units, its capacity will be re-calculated.**
- 6. Where a scheme would provide more affordable homes than are needed in the parish and the adjacent parishes, now and in the near future a financial contribution will be required towards affordable housing needed elsewhere in the National Park in accordance with Policy GP5.**
- 7. Proposals for specialist housing will be permitted where they accord with HC-D3.**
- 8. Where permission is granted condition(s) will be attached removing permitted development rights in accordance with HC-S2 and CE-S5.**

NEW BUILD HOUSING IN SETTLEMENTS

- 6.101 The 1997 Local Plan restricted open market new build housing within villages to redevelopment sites. This was a response to the high level of open market in-fill housing built during the previous 5-20 years that tended to erode the character of Exmoor's villages. The approach in the 2005 Plan was to prioritise the provision of local needs affordable housing in all settlements through both new build and conversions in order to make the best use of existing buildings, minimise building on greenfield land and help retain vibrant local communities.
- 6.102 This Plan continues the approach in settlements of seeking all new build housing to be affordable housing to meet local needs. Given the outstanding character of Exmoor's settlements, new build housing will have to be located and designed so that it conserves or enhances the individual character of each settlement. It is considered that this policy approach has been appropriate in the context of National Park designation and has been successful in delivering new affordable housing through the rural exceptions site approach. Between 2005/06 and 2013/14, 83 local need affordable homes were built. ENPA wishes to retain the focus on addressing the community's need for affordable housing. In a designated area with a highly sensitive landscape, with few suitable housing sites, there is a need to minimise new housing especially on greenfield sites to that which is essential. In principle, therefore, it is not considered appropriate to provide for cross subsidy housing in Exmoor National Park so as to maintain a supply of sites for local community needs in the longer term.
- 6.103 However, at the time of drafting, there have been national changes to the way in which affordable housing is funded. Reductions in housing grant administered by the Homes and Communities Agency (HCA), together with the setting of higher rent levels for affordable homes as a condition of that funding, have resulted in a greater reliance on private lending for affordable housing schemes which means that, at the current time, it is very difficult for Registered Providers to deliver affordable housing on exception sites. ENPA has therefore taken the difficult decision, while seeking all housing to be for affordable local need, to consider cross subsidy where it can be clearly demonstrated that there are no other means of funding a scheme including through cross funding from other schemes in a Registered Provider's programme outside the National Park. In the meantime the case for realistic levels of grant funding to ensure that the National Park can be protected and ensure local needs affordable housing can be provided without the need for additional cross subsidy housing will continue to be made.
- 6.104 A key factor in achieving affordable new build housing is to obtain land at the lowest possible value such that it is possible for housing associations, community land trusts and local households to acquire it for the purposes of affordable housing. The impact of the housing policies within this Local Plan based on the rural exceptions approach should be to keep land development values lower than would otherwise be the case. Proposals which include additional housing to help deliver affordable housing schemes, will need to demonstrate that the affordable housing will be owned or controlled by Registered Providers or Community Land Trusts. Registered Providers are those social housing providers on the statutory register compiled by the Homes and Communities Agency (or successor agency) which lists private providers, not-for-profit providers (of whom most are housing associations), for-profit providers such as private developers and local authority providers.

- 6.105 Schemes proposing a mix of affordable housing and 'Principal Residence' housing to fund it, will be scrutinised through 'an open book' approach to ensure it can be demonstrated that the 'Principal Residence' housing is essential for the viability of the scheme and that it replaces current reductions in public housing grant rather than increasing land value. ENPA will need to be convinced that cross subsidy through 'Principal Residence' housing is the only alternative and there are no other sources of funding. This is because the number of new dwellings on greenfield land should be minimised to that which is necessary to address local housing needs. Higher land values will impact on scheme viability and in the longer term would result in a greater number of houses to deliver the affordable using up suitable housing sites more quickly and reducing the ability to deliver affordable housing for local needs in the National Park in the longer term.
- 6.106 In terms of Clause 2 a) (ii) of Policy HC-D2, ENPA will expect that any market ('Principal Residence') housing to fund affordable housing proposed in Local Service Centres or Villages will be less than the number of affordable dwellings. This applies the approach set out in the NPPF that planning authorities should consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs. The timing and delivery of the affordable and principal residence housing will be secured through the planning approval.
- 6.107 The only other circumstances in which Principal Residence housing may be permitted is where it is through the redevelopment of a 'Vacant Building(s)' in accordance with HC-D2 clause 2 b) and HC-S1 clause 4 only. Agricultural buildings and previously developed land without buildings do not come within the definition of 'Vacant Buildings'.
- 6.108 Where permission is granted, condition(s) will be attached removing permitted development rights in respect of extensions to local need affordable dwellings and dwellings of up to 90sqm in size in accordance with HC-S2 to ensure that the dwellings remain more affordable and contribute to a balanced local housing stock.
- 6.109 Consistent with GP3 (Spatial Strategy), the National Park Authority will monitor permissions for housing in relation to the landscape capacity of individual settlements and the National Park as a whole to accommodate new housing development. Where monitoring indicates that the capacity to accommodate local needs housing over the longer term may be compromised, a review of the approach to providing for additional housing to help deliver affordable housing schemes will be triggered to ensure that it is consistent with National Park purposes. In such an event, the potential for alternative approaches to providing for local affordable housing will be crucial.

HC-D2 NEW BUILD DWELLINGS IN SETTLEMENTS

- 1. New build housing development will be permitted in named settlements where:**
 - a) the site is well related to existing buildings and any development would conserve or enhance the character of the traditional settlement pattern and the character and appearance of the site and its surroundings;**
 - b) it will meet an affordable local need, there is a proven local need for the dwelling(s) and that need cannot be met within the existing housing stock, or from-sites/buildings already with planning permission;**
 - c) the intended occupants meet the requirements of the local need occupancy criteria which will be secured in perpetuity through a planning obligation in accordance with HC-S3; and**
 - d) the dwelling(s) will be affordable by size and type to local people and will remain so in perpetuity in accordance with HC-S2;**
- 2. All new build housing must address an identified local need and be affordable with occupation restricted to local people in perpetuity unless, in the named Local Service Centres and Villages, where:**
 - a) For reasons of financial viability, ENPA is satisfied that it can be clearly and robustly demonstrated that:**
 - i) An element of principal residence market housing (HC-S4) is required to enable delivery of affordable housing which cannot be made financially viable without it. The affordable housing will be owned or controlled by a Registered Provider (including Housing Associations) or a community land trust. The intention will remain the provision of 100% affordable housing to meet an identified local need.**
 - ii) It is the minimum number of principal residence houses required to support the delivery of the required affordable housing.**
 - iii) The affordable dwellings will be occupied by a person(s) with a proven housing need in accordance with the local occupancy definition in HC-S3 and will otherwise accord with this Policy.**
 - iv) In terms of size and type, the mix of principal residence market housing is in accordance with HC-S2;**
 - v) the affordable housing and principal residence housing are indistinguishable and fully integrated on the development site; and**
 - vi) The affordable housing will be provided broadly in-step with the principal residence housing as development progresses.**
 - or**
 - b) It is 'Principal Residence' housing through the redevelopment of a 'Vacant Building(s)' in accordance with HC-S1 clause 4 only. In such cases, for a building to be considered as Vacant, applicants will need to demonstrate that it is not abandoned and that it has been unoccupied and without content for a minimum of 3 years.**
- 3. Proposals for specialist housing will be permitted where they accord with HC-D3.**
- 4. Where permission is granted for local need or 'principal residence' dwellings or specialist housing of up to 90sqm floorspace, a condition will be attached removing permitted development rights in accordance with HC-S2.**

SPECIALIST HOUSING FOR EXMOOR'S COMMUNITIES

- 6.110 Policy HC-D3 makes provision for specialist housing for older people and other vulnerable members of the National Park's communities. This accords with Policy HC-S2 which aims to ensure that the mix in terms of the size, type and tenure of housing permitted in the National Park contributes to that which is needed by local communities and Policy HC-S1 which makes provision for specialist housing for older people and other vulnerable members of the community.
- 6.111 National Policy confirms that a focus on affordable housing is appropriate and that authorities and agencies should work together to meet the needs of local communities.³⁰⁸ Planning authorities should be responsive to local circumstances and plan for housing to reflect local needs, and plan for a mix of housing to cater for the needs of older people and people with disabilities (including retirement and specialised housing for those with support or care needs).³⁰⁹ To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Guidance notes the need for housing for older people. Consideration should be given to the size, location and quality of dwellings needed in the future.³¹⁰
- 6.112 Exmoor has a higher than average proportion of older age groups with over 65s making up nearly one third of the population. West Somerset and Exmoor National Park have the highest average age in England. It is predicted that Exmoor will continue to have a much higher than average older population with a high proportion of over 65s households living alone. A quarter of all households with no dependent children include one or more persons with a long term health problem or disability.³¹¹
- 6.113 The Exmoor National Park in West Somerset SHMA Update assessed the requirement for different types of specialised housing based on the projected growth for older households. It estimated the 2011 requirement to be 138 specialised units of accommodation, with an additional 69 homes for older households required for the West Somerset area of the National Park 2011-2031. This figure was part of the net overall housing requirement and not additional to it.³¹² Although the 2015 Joint SHMA Update provides an updated OAN for Exmoor National Park, the figures indicate the potential need/demand for such housing over the plan period.³¹³

³⁰⁸ DEFRA (2010) English National Parks and the Broads UK Government Vision and Circular, London: Department for Environment, Food and Rural Affairs, para. 79.

³⁰⁹ DCLG (2012) National Planning Policy Framework, London: Department of Communities and Local Government paragraph 50 and Annex 2.

³¹⁰ DCLG (2014) Planning Policy Guidance: Housing and economic development needs-assessment (Paragraph: 021 Reference ID: 2a-021-20140306) [Online] <http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-development-needs-assessments/methodology-assessing-housing-need/>

³¹¹ Office for National Statistics (2011) Census 2011. London: The Stationery Office.

³¹² Housing Vision (2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset, para. 5.32 and Table 5.15.

³¹³ Housing Vision (2015) Northern Peninsula Strategic Housing Market Assessment Update.

- 6.114 As people grow older their housing needs often change and homes may become unsuitable with many single elderly residents living in large family houses that are not appropriate to their needs. It appears that there are Exmoor households, particularly of older people, living in unsuitable accommodation. Older people or those with disabilities may have specialist accommodation needs that are not met by the general housing stock.
- 6.115 The financial implications of an ageing population and measures necessary to sustain independent living by older people are being considered nationally including equity release arrangements and services that help older people adapt their homes to allow them to live in them for longer.³¹⁴
- 6.116 The National Park Authority recognises the importance of supporting the housing needs of an ageing population and, within the context of National Park designation and other housing policies in this plan, ENPA considers it is important that opportunities should be taken to address the local need for specialist housing for older people and other vulnerable members of the community. Policy HC-S2 requires that all new housing should enable adaptation to build up a stock of housing which should be suitable for people over their lifetime. Policies also provide for the creation of smaller units of accommodation through subdivision/adaptation of existing homes. Older people and/or those in need of care and assistance who have access to appropriate support and finance may, through such measures, be able to continue to live in their own homes for longer.
- 6.117 Subdivision of homes may provide equity for necessary adaptations or enable a family member to provide support through living next door. Proposals for subdivision should comply with Policy HC-D14. Where there is no suitable housing within the existing housing stock, including specialised extra care and sheltered housing, or if adaptation/subdivision cannot be achieved then an identified need for specialist housing may be able to be addressed through new housing.
- 6.118 For those in affordable need, this may be through appropriately designed affordable housing with local occupancy ties in accordance with housing policies. Where there is an identified need for specialist housing and a household would not meet the criteria for affordable housing, any market (principal residence) housing, proposed as an element of a scheme to help to fund affordable housing, and justified in the first instance, by a local need for affordable housing (HC-D1 or HC-D2), should also include specialist housing units. In such cases, the affordable housing element of the scheme is or will be owned or controlled by a Registered Provider or Community Land Trust.
- 6.119 Local needs affordable housing has occupancy ties to ensure it is lived in by people meeting the local occupancy requirements. However, the high external demand for housing in the National Park from older age groups means that there is a likelihood that new 'Principal Residence' specialist housing, to fund the affordable housing although of a size and type needed by Exmoor's communities, could predominantly be bought by older people moving from other parts of the UK, so exacerbating the trend towards an older population.
- 6.120 Given the limited availability of suitable housing sites and the competing demands on them to satisfy the needs of local communities, the question of meeting general needs beyond those of the National Park becomes an important issue. Evidence

³¹⁴ DCLG (2008) Lifetime Homes, Lifetime Neighbourhoods: a National Strategy for Housing in an Ageing Society; HCA (2009) Panel for Innovation, Housing our Ageing Population: HAPPI report. All Party Parliamentary Group (2012) Housing and Care for Older People, Housing our Ageing Population: Plan for Implementation (HAPPI 2' Report); National Housing Federation (2012) Housing in Later Life Planning Ahead for Specialist Housing for Older People; House of Lords Select Committee (2013) Public Services and Demographic Change: Ready for Ageing?

from consultation indicated high support for local needs affordable housing and support for the principle of local housing.³¹⁵ There was also some support for market and local housing to help deliver affordable housing and where it could support provision of other housing needed locally, such as for an ageing population.³¹⁶ Policy HC-D3, therefore, provides for housing to address a local need for older people's accommodation where adequate care and assistance cannot be provided within the existing housing stock. Local occupancy ties will be attached to permissions for new specialist housing through the use of planning obligations. In this way, such housing will address the locally arising needs of the National Park's older residents and other vulnerable members of the community in the longer term rather than contributing to a potential increase in older households moving to the area. Viability assessments indicate, where land values remain reasonable, that local housing has the potential to help fund local needs affordable housing.³¹⁷

- 6.121 Housing providers and developers of two or more affordable homes need to show that they have taken into account the housing needs of the community. This includes the need for specialist housing. Proposals for residential institutions (HC-S7), including specialist accommodation providing care, such as nursing homes, should also provide evidence on the local need for the development.
- 6.122 Specialist housing should be specifically designed to meet the needs of older people, generally those of retirement age, and/or other vulnerable members of the community who require care and assistance and whose needs cannot otherwise be met through the existing housing stock. As such it will be subject to additional standards. Proposals should accord with CE-S5 and, where they relate to existing traditional buildings, should ensure that any alterations or conversion work do not harm the fabric or character of the building.
- 6.123 New dwellings should be reasonable in size and evidence indicates that two bedroom housing is likely to be the most needed size.³¹⁸ The policy, therefore, requires that owner-occupied, specialist housing should not exceed 90sqm floorspace. In this way, it will contribute to the stock of housing most needed by Exmoor's communities and help ensure that land take is minimised given the limited and finite number of suitable housing sites in settlements. The Exmoor Housing SPD will set out in more detail, standards and requirements relating to assessing the need for the size type and tenure of housing and arrangements for cascades for future occupiers. Specialist Housing Proposals should accord with Policy AC-D3 (Parking Provision and Standards) to ensure that provision is appropriate for the needs of residents.
- 6.124 Evidence for the National Park, indicates that the level of demand from people moving into the area is such, that it is reasonable to assume that were people to 'downsize' that their previous home, would in turn be moved into by older people from other parts of the UK. They would be unaffordable to younger people and families on average local incomes.

³¹⁵ ENPA (2011) Strategic Options Consultation (2011-12) [Online] Available: <http://www.exmoor-nationalpark.gov.uk/>

³¹⁶ Ibid, Question 4.

³¹⁷ Nathaniel Lichfield & Partners (2011) Exmoor National Park Housing Viability Assessment. Dulverton: ENPA.

³¹⁸ Housing Vision (2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset, Dulverton: ENPA

HC-D3 SPECIALIST HOUSING FOR EXMOOR'S COMMUNITIES

- 1. Proposals which address an identified local need or requirement for specialist housing for older people and/or other vulnerable members of the community who require care and assistance will be permitted where:**
 - a) it cannot be provided within the existing housing stock, including through the appropriate subdivision and adaptation of existing dwellings in accordance with HC-D14 or from sites/buildings already with planning permission;**
 - b) proposals for more than one dwelling unit of local needs affordable housing and any principal residence market housing provide for an identified need or requirement for specialist housing permitted in accordance with HC-D1 or HC-D2; and where:**
 - i) it will be integrated into the local community to enable access to required services and facilities;**
 - ii) it is built to standards and to a size in accordance with HC-S2; and**
 - iii) subdivision, adaptation or conversion work accords with CE-S5.**
- 2. A planning obligation will be secured to ensure that the occupancy of specialist housing is confined in perpetuity to a local person (and their dependents) who has a minimum period of a total of 10 years permanent residence within parishes in the National Park.**
- 3. Where permission is granted a condition will be attached removing permitted development rights in accordance with HC-S2.**
- 4. The planning obligation will allow, where properties become vacant, and where no person in need of specialist housing, can be found to occupy a property, other persons with a local affordable housing need consistent with HC-S3 to occupy the dwelling.**
- 5. The provision of specialist accommodation offering care through a residential institution, should be in accordance with HC-S7.**

'EXTENDED FAMILY' DWELLINGS

- 6.125 Policy HC-D4 sets out criteria to assess proposals for the re-use of an existing traditional building as a dwelling for 'extended family'. The intention of the policy is to provide appropriate opportunities for the re-use of an existing traditional building to enable families to provide support for each other by living close by. This is considered particularly important to support local communities given Exmoor's ageing population.
- 6.126 In accordance with Policies including CE-S5, proposals will have to be sensitively designed and lead to an enhancement of the immediate setting to conserve the character of the building and the landscape of the National Park and to enable the family to provide support. Policy HC-D4, therefore, requires that 'extended family' dwellings will only be acceptable through the re-use of an existing traditional building within the curtilage of a dwelling in a settlement identified in GP3 (a Local Service Centre or a Village) or where there is an existing dwelling in a farmstead, and not in isolated locations.
- 6.127 Clause 2 of the policy requires the occupants to be 'immediate family' as a direct descendent or antecedent i.e. children, parents, grandparents, or great grandparents. Occasionally, relatives who do not meet the definition of immediate family may be considered where they are a dependent relative with an essential need to live close to another person because of age, family or medical reasons. In all cases, the

occupier of the associated existing dwelling or the new dwelling should have a local connection of 10 years or more residence in the parish or adjoining parish. This reflects the National Park Authority's statutory duty to, and will provide additional housing choice for, Exmoor's local communities.

- 6.128 Where permission is granted for residential re-use for 'extended family', occupancy will be controlled through a local occupancy tie.

HC-D4 EXTENDED FAMILY DWELLINGS CRITERIA

- 1. An extended family dwelling will only be permitted through the change of use of an existing traditional building in accordance with CE-S5 and in close association with an existing dwelling:**
 - a) in settlements within the curtilage of an existing dwelling; or
 - b) a farmstead within an existing group of buildings.
- 2. Extended family dwellings, will be occupied by a person(s) (and their dependents) who can demonstrate that:**
 - a) the occupier of the associated existing dwelling or the new dwelling has a minimum period of 10 years or more in the last 20 years permanent and continuous residence in the parish or an adjoining parish; and
 - b) they are immediate family by virtue of being a direct descendent or antecedent of the permanent occupier of the associated existing dwelling; or
 - c) exceptionally, they are a dependent relative who has an essential need to live close to another person, the need arising from age, family or medical reasons.
- 3. A planning obligation will be secured to ensure that the intended occupants meet the requirements of the extended family occupation in this policy and to tie the dwelling(s) to the main house to ensure that they are not sold off separately.**
- 4. The variation of a planning obligation which restricts the occupancy of an extended family dwelling as set out in this policy will only be permitted where the occupancy of the dwelling is limited by agreement to local persons as defined in HC-S1 and HC-S3, or as a holiday let where the proposal is in accordance with HC-D13.**
- 5. Where permission is granted a condition will be attached removing permitted development rights in accordance with HC-S2.**

CUSTOM/SELF BUILD HOUSING

- 6.129 The Government defines custom build housing as either a builder being contracted by a home owner to create a 'custom built' home or where a private individual builds their own home as a 'self-build'. It wants to enable more people to build their own home.³¹⁹ Surveys of local residents should be considered to assess local housing need for this type of housing, and a local list or register compiled of people who want to build their own homes.³²⁰ Exmoor and Dartmoor National Park Authorities have established local registers of people interested in self-build or custom build as part of a joint 'Right to Build' Vanguard project.³²¹ The register will be used to help identify and address the local need for affordable housing from those who work and have

³¹⁹ DCLG (2012) National Planning Policy Framework Department of Communities and Local Government; para. 50 and DCLG (2012) House Building Policy [Online] Available: www.gov.uk/government/policies/increasing-the-number-of-available-homes/supporting-pages/self-builders

³²⁰ DCLG (2014) Planning Policy Guidance: Housing and economic development needs-assessment (Paragraph: 021 Reference ID: 2a-021-20140306) [Online] Available: <http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-development-needs-assessments/methodology-assessing-housing-need/>

³²¹ ENPA (2014) Self-build: Right to Build Vanguard [Online] Available: <http://www.exmoor-nationalpark.gov.uk/>

longstanding residency in the National Park in line with Policy HC-S1 and other housing policies in this plan. Some sites have been assessed through the SHLAA process, and will be considered for self-build schemes. As part of the Vanguard Project, landowners have also been invited to suggest sites or buildings which are suitable for new build self-build housing or for housing through conversions.

- 6.130 Custom or self-build housing can be achieved in different ways:
- a) Self-build: being physically involved in part or all of the construction of one's own home;
 - b) Self-finish: taking on a property which is structurally complete, and finishing the building oneself;
 - c) Community self-build: being physically involved in part of all of the construction of one's home, as part of a wider scheme on one site;
 - d) Custom build - where a house builder offers a serviced building plot and may also provide a design and build service to create the home.
- 6.131 Exmoor National Park Authority has a strong track record in helping to deliver affordable housing for local people. A number of individuals have converted an existing building, or had a new home built recognising that self/custom build can be a more affordable way of owning a home, including starter homes for younger people, and to achieve more control over design and sustainability. This form of housing can include single homes on small plots, as well as community self-build projects. The 2005 plan did not prescribe tenure but instead ensured that all new build housing remained more affordable in perpetuity through a local need occupancy tie and upper size limit, an approach continued in this plan.
- 6.132 Policy HC-D5 seeks to encourage custom/self-build housing where it will meet an identified local affordable housing need. Custom/self-build housing proposals will be considered in named settlements (GP3) in accordance with either Policy HC-D1 (conversions to dwellings in settlements) or HC-D2 (new build dwellings in settlements). Where the requirements of this and other policies in the plan are met, Policy HC-D5 also extends the principal of custom/self-build to rural communities to provide for opportunities to have small scale development to address the needs of their community for affordable housing. Rural communities are very small communities in the open countryside, not identified in the settlement hierarchy, defined as those which have service provision in the form of a shop, public house or a community meeting place/hall and therefore considered to be appropriate locations for self-build opportunities to meet local affordable housing needs. At the time of drafting these are Allerford, Countisbury, Hawkridge, Heasley Mill, Kentisbury, Luccombe, Martinhoe, Oare/Malmsmead, Selworthy, Twitchen, West Porlock and Withycombe.
- 6.133 Providing opportunities for limited new self-build housing to address the local need for affordable housing should help to sustain these rural communities over the longer term. The National Park Authority will monitor permissions for housing in relation to the landscape capacity of rural communities and the National Park as a whole to accommodate new housing development. Where monitoring indicates that the capacity to accommodate local needs housing over the longer term may be compromised, a review of the approach to providing for additional housing to help deliver affordable housing schemes will be triggered to ensure that it is consistent with National Park purposes. In such an event, the potential for alternative approaches to providing for local affordable housing will be crucial.
- 6.134 Opportunities for employment premises or other uses should be met through the change of use and/or conversion of existing buildings within the settlement, or

through the extension of existing business premises in accordance with Policy SE-S3 Business Development in the Open Countryside.

HC-D5 CUSTOM/SELF BUILD LOCAL NEED HOUSING IN RURAL COMMUNITIES

- 1. Exceptionally, new build including custom/self-build housing will be permitted where:**
 - a) it is in a named settlement or in a rural community in the open countryside (proposals in a named settlement will be determined in accordance with HC-D1 or HC-D2 as appropriate);**
 - b) the site is well related to existing buildings, any development is proportionate in scale and it would conserve or enhance the traditional pattern of the rural community, landscape character and the appearance of the site and its surroundings;**
 - c) there is a proven local need for the dwelling(s) which will meet an affordable local need, and the intended occupants meet the requirements of the local need occupancy criteria which will be secured in perpetuity through a planning obligation in accordance with HC-S3;**
 - d) the dwelling(s) will be affordable by size and type to local people and will remain so in perpetuity in accordance with HC-S2; and**
 - e) where permission is granted, a condition will be attached removing permitted development rights in respect of extensions in accordance with HC-S2.**
- 2. In rural communities, housing schemes that require cross subsidy through 'principal residence' housing' or 'specialist housing' whether new build or through the change of use of existing non-residential buildings will not be permitted.**

THE CHANGE OF USE OF SERVICED ACCOMMODATION TO HOUSING

- 6.135 Policy RT-D3 sets out the criteria to be satisfied for proposals for the change of use of existing serviced accommodation. Where proposals relate to a part or complete change of use to housing, Policy HC-D6 below will apply. In the first instance, the requirements of Policy RT-D3 should be satisfied. In considering proposals for the change of use to housing, the intention will remain the provision of 100% affordable housing. For proposals within Local Service Centres and Villages (GP3), Policy HC-D1 will apply. Outside these areas, an element of 'Principal Residence' housing may be permitted where it accords with the criteria in the policy. This will be either that it is required for reasons of financial viability to enable delivery of the affordable housing or, where a scheme would provide more affordable homes than are needed in the parish / adjoining parishes, a financial contribution will be required towards affordable housing needed elsewhere in the National Park. In all cases, the 'Principal Residence' housing will be the minimum number to support the delivery of the affordable housing.

HC-D6 THE CHANGE OF USE OF SERVICED ACCOMMODATION TO HOUSING

- 1. Proposals for the change of use of serviced accommodation to dwelling(s) will only be considered where the requirements in RT-D3 are satisfied. The intention, through the change of use will remain the provision of 100% affordable housing to meet an identified local need.**
- 2. In the Local Service Centres and Villages, proposals will accord with HC-D1.**
- 3. Outside the Local Service Centres and Villages, an element of principal residence market housing in accordance with HC-S4 may only be permitted where:**
 - a) the proposal meets the requirements of CE-S5;**
 - b) it is clearly and robustly demonstrated that it is required to enable delivery of affordable housing which cannot be made financially viable without it;**
 - c) the building is able to accommodate more than one dwelling unit;**
 - d) it is the minimum number of principal residence market houses required to support the delivery of the required affordable housing and to maximise the proportion of affordable homes within viability constraints;**
 - d) the affordable dwellings will be occupied by a person(s) with a proven housing need in accordance with HC-S3;**
 - e) in terms of size and type, the affordable dwellings and the mix of principal residence market housing is in accordance with HC-S2;**
 - f) the affordable housing and principal residence market housing will be indistinguishable and will be fully integrated on the development site; and**
 - g) the affordable housing will be provided broadly in-step with the principal residence housing as development progresses.**
- 2. The National Park Authority will ensure that, whether through a single permission or incremental permissions, the number of affordable dwellings created is that which would have been required if the scheme had been constructed as a single development having regard to the planning unit and previous permissions since the adoption of the March 2005 Local Plan. In the case of the creation of more than one dwelling from a single previous planning unit (whether at once or over a period of time) the development should contribute the maximum number of local need affordable homes consistent with this policy.**
- 3. Where there is reason to believe that the proposal is formulated with a view to circumventing or mitigating affordable housing requirements, including where the National Park Authority considers that a building is able to accommodate more than one dwelling unit, its capacity will be re-calculated.**
- 4. Where a scheme would provide more affordable homes than are needed in the parish and the adjacent parishes, now and in the near future, a financial contribution will be required towards affordable housing needed elsewhere in the National Park in accordance with GP5. Any housing which may be permitted to deliver the required affordable housing should be principal residence housing (HC-S4) and will be the minimum number required to support the delivery of the affordable housing.**
- 5. Where permission is granted, condition(s) will be attached removing permitted development rights in accordance with HC-S2 and CE-S5.**

HOUSING OUTSIDE SETTLEMENTS

CONVERSIONS TO DWELLINGS, NEW BUILD HOUSING IN THE OPEN COUNTRYSIDE RURAL WORKERS AND SUCCESSION FARM DWELLINGS

- 6.136 National guidance states that housing should be located where it will enhance or maintain the vitality of rural communities and that new isolated homes in the countryside should be avoided. Policies in this Plan therefore focus new build housing in the settlements identified in Policy GP3.
- 6.137 Housing for rural workers in agriculture and forestry who have an essential need to live permanently at or near their place of work can sometimes justify a new home in open countryside. Nevertheless, a rural enterprise must be acceptable in its location before a new home is even considered and it will often be more sustainable for workers to live in nearby towns or villages or in suitable existing housing. Policies HC-D7 and HC-D8 therefore require applicants, in all cases, to demonstrate that the need for new housing in the open countryside cannot be met within the existing housing stock, from sites or buildings already with planning permission for housing or through the extension and/or subdivision of an existing home.
- 6.138 Justifying a new home outside of a settlement, in the open countryside depends on the essential functional and financially sound needs of an enterprise for full-time employees to live at their place of work. Normally, this will be full-time agricultural workers, as forestry employment based upon contract labour, is often less locationally fixed. Dwellings for rural workers in the open countryside, whether through a conversion or for a new build dwelling, will therefore require the submission of an independently prepared appraisal to accompany an application. This will need to justify an essential functional need and the long-term financial viability of the business for any accommodation, with a requirement that the worker(s) need to be readily available at most times, day and night for most of the year, and bearing in mind current and future business requirements. Where there is any doubt as to the permanent need for the dwelling, or the financial viability of the business is marginal, then temporary permission may be given for a residential caravan in accordance with Policy HC-D11.
- 6.139 Rural worker dwellings are required to be 90sqm or less. Exceptionally, a dwelling larger than 90sqm may be permitted for example to accommodate a farm office. This will be considered where the dwelling is the principal or only dwelling on a holding. In such cases, the upper size limit of the dwelling will be 120sqm.
- 6.140 Policy HC-D9 sets out criteria for assessing applications for housing in the open countryside for rural workers in agriculture, forestry or other rural land based enterprises. Proposals for both the conversion of existing buildings to dwellings (HC-D7) or proposals for new build housing (Policy HC-D8) for rural workers will need to accord with Policy HC-D9 or for succession farm workers Policy HC-D10. A rural worker in agriculture, forestry or other land based rural enterprise operating in the locality will need to be a worker who is engaged in actual physical work, actively contributing to the management of the land and justifying the need for a new home in that location. This is because non-physical work, although it may be associated with the business, can be achieved away from the enterprise and such cases will not meet the exceptional tests needed to justify a new home in the open countryside (see Annex 2 to this Plan). Proposals for housing for workers in the open countryside who are not employed in agriculture, forestry or other rural land based enterprises will be considered through the reuse of existing buildings for local need affordable housing in accordance with Policy HC-D7 and the local occupancy criteria in Policy HC-S3 clause 1 e) where they need to live close to their place of work or they meet the

criteria of an Exmoor worker. The definition of an Exmoor worker and further guidance will be set out in the Exmoor Housing SPD.

- 6.141 The conversion of buildings in the open countryside to provide accommodation helps to reduce demand for further house building elsewhere on greenfield sites. Policy HC-D7 provides for the conversion of existing buildings to dwellings for the essential functional need for a rural worker (as above) and as local need dwellings. It also makes provision for 'extended family' accommodation or for 'succession farming'. Where permission is granted for residential re-use for local needs, Policy HC-D7 requires that occupancy will be controlled through planning obligations in the same way as conversions within settlements. For rural (or succession farm) workers, occupancy will be controlled through occupancy conditions consistent with the approach for a new build dwelling in the open countryside). The requirements for initial and subsequent occupiers of such dwellings are set out in Annex 2 of this Plan.
- 6.142 Policy HC-D7 sets out criteria on the different locational requirements which will apply in each case depending on the proposed occupier. The building will need to be located:
- a) for local need accommodation, in a hamlet or farmstead where there is an existing dwelling;
 - b) for 'extended family accommodation', in a farmstead within an existing group of buildings, and in close association with an existing dwelling;
 - c) for rural worker or succession farm dwellings, well related to existing buildings on the holding such that the dwelling and farm buildings operate as a single entity.
- 6.143 Proposals for new build rural worker or succession farm dwellings will need to accord with HC-D8 and be well related to existing buildings on the holding such that the dwelling and farm buildings operate as a single entity. Considerations will include whether there is a joint access. Ensuring that the proposal relates well to existing buildings can also provide other benefits such as increased security through 'natural surveillance'.
- 6.144 In respect of local needs housing or 'extended family dwellings', permission will only be granted outside a settlement, in the open countryside, where there is an existing dwelling in a farmstead, and not in isolated locations. In assessing proposals for the conversion of groups of redundant traditional buildings encouragement will be given to joint business use.
- 6.145 In accordance with Policy CE-S5 Principles for the Conversion or Structural Alteration of Existing Buildings, proposals will have to be sensitively designed to conserve the character of the building and its landscape setting.
- 6.146 In considering proposals for new build dwelling for a rural worker through Policy HC-D8, the National Park Authority will need to be satisfied that there is no existing accommodation potentially available (or which has recently been sold which could have met the needs), or that the conversion/change of use of existing buildings or a temporary caravan is not a viable alternative. Where necessary, the National Park Authority will attach a condition to any other existing dwelling(s) on the holding, restricting the occupancy to those engaged in agriculture, forestry or other business. Exceptionally, planning obligations may also be attached tying the dwelling to the holding or business to ensure that dwellings are not disposed of separately from the business as a whole. Such cases may include where there is a history of fragmentation of the farm holding leading to new agricultural workers dwelling(s). It is considered there may be occasions where this is can be justified to conserve the National Park and/or its special qualities.

- 6.147 Proposals for residential development associated with a low impact sustainable or environmental land based lifestyle (which can also be known as ‘One Planet Development’), and which may include temporary structures such as traditional ‘benders’ or yurts constructed of natural materials for which no conventional foundations are required, will be considered in terms of whether they are in accordance with the policies in this plan. These include the Spatial Strategy (Policy GP3), housing, landscape character and design policies.
- 6.148 Where permission is granted through HC-D7 and HC-D8, condition(s) will be attached removing permitted development rights granted by the Town and Country Planning (General Permitted Development) Order 2015 in respect of extensions, in accordance with HC-S2 to ensure that the dwellings remain more affordable and contribute to a balanced local housing stock, and for alterations to ensure that the character of the building is conserved in accordance with Policy CE-S5.
- 6.149 Applications to remove agriculture or rural worker occupancy ties will be carefully assessed. In the case of succession farm dwellings permitted under Policy HC-D10, it may be occupied by other rural workers when the dwelling becomes vacant. When the exceptional need for this type of home no longer exists it can contribute to the provision of local need including intermediate or “more affordable” housing or where a need cannot be identified, holiday let accommodation. Policies in this plan set out the criteria to be met in such cases.

HC-D7 CONVERSIONS TO DWELLINGS IN THE OPEN COUNTRYSIDE

- 1. In the open countryside the change of use of a non-residential building(s) to a dwelling(s), will be permitted where:**
 - a) the need for the dwelling(s) cannot be met within the existing housing stock, from sites/buildings already with planning permission or through the acceptable extension and/or subdivision of an existing dwelling; and**
 - b) it is in accordance with CE-S5; and**
 - c) in the case of local need accommodation, the building is located in a hamlet or farmstead where there is an existing dwelling. The intended occupants will meet the local need criteria in HC-S3 and a planning obligation will be secured to ensure that occupancy of the dwelling(s) is confined to persons in local housing need in perpetuity; or**
 - d) in the case of ‘extended family accommodation’, the building is located in a farmstead within an existing group of buildings, in close association with an existing dwelling and the proposal otherwise accords with HC-D4; or**
 - e) in the case of a rural worker or succession farm dwelling, the building is well related to existing buildings on the holding. The occupancy of a rural worker dwelling will be limited to a person(s) able to demonstrate a proven essential need for the accommodation in accordance with HC-D9 or, for a succession farm dwelling, the occupancy requirements in HC-D10.**
- 2. In the case of buildings within an existing agricultural, or other primary business responsible for land management, a change of use will only be permitted where it can be demonstrated that the agricultural use of the existing building(s) to be reused is redundant.**
- 3. Where permission is granted a condition will be attached removing permitted development rights in respect of extensions in accordance with HC-S2 and in respect of alterations in accordance with CE-S5.**

HC-D8 NEW BUILD DWELLINGS IN THE OPEN COUNTRYSIDE

- 1. New dwelling(s) in the open countryside will only be permitted where:**
 - a) the accommodation is designed to meet a proven need for a rural worker in accordance with HC-D9 or succession farm worker in accordance with HC-D10 that cannot be met:**
 - i. within the existing housing stock including through the subdivision of an existing dwelling, from sites/buildings already with planning permission; or**
 - ii. through the provision of a temporary residential caravan in accordance with HC-D11; or**
 - iii. the conversion/change of use of an existing building in accordance with CE-S5 and HC-D7;**
 - b) the dwelling is well related to existing buildings on the holding such that the dwelling and farm buildings operate as a single entity; and**
 - c) the design and layout of the development meet the requirements of CE-S6 and the net floorspace will be in accordance with HC-D6 or HC-S2 as appropriate.**
- 2. Where permission is granted a condition will be attached removing permitted development rights in respect of extensions.**
- 3. Where permission is granted for a new dwelling on an agricultural or forestry holding that has an existing dwelling(s) under the control of the applicant which needs to be used in connection with the enterprise, a condition will be attached to ensure that the occupancy of any existing dwelling(s) is also limited to persons able to demonstrate a proven essential need for that accommodation.**

HC-D9 RURAL WORKERS

- 1. New housing to meet the needs of rural workers in the open countryside will only be permitted in accordance with HC-D7 or HC-D8 and where:**
 - a) it is justified by a proven essential functional need for a full time rural worker in agriculture, forestry or other rural land based enterprises to live permanently at or near their place of work;**
 - b) in the case of agriculture or other rural land based enterprises, the business is proven to be financially viable in the long term, it is extensive in nature, the land management activity contributes to the conservation or enhancement of the natural beauty and wildlife of the National Park and is in accordance with the tests set out in Annex 2 of this Plan;**
 - c) where the need for a dwelling is proven, a planning condition will be attached to ensure that occupancy of the dwelling(s) is confined to a rural worker in agriculture, forestry or other land based rural land enterprise operating in the locality and in accordance with clause 1. a) above; and**
 - d) the net floorspace will be 90sqm or less unless the Authority is satisfied that a larger dwelling is required in which case, the size of the dwelling will be commensurate with the needs of the holding, it can be sustained by the farm business and it would be affordable for the essential need in perpetuity.**

SUCCESSION FARMING - SECOND DWELLINGS ON ESTABLISHED FARMS

- 6.150 Consultation indicated support for the re-use of existing buildings to provide for succession farming.³²² There is evidence that there is an ageing farming population on Exmoor. To encourage younger people to manage farm businesses, a second dwelling may be considered on established farms that are financially sustainable where the criteria for a full time worker as set out in Policies HC-D8 (new build housing in the open countryside) and HC-D9 (Rural Workers) cannot be fully satisfied. To satisfy the terms of the policy it will be required that the proposal accords with Annex 2 of this Plan; and:
- a) there are secure and legally binding arrangements in place to demonstrate that the farm business is jointly held, including by a person younger than the person currently responsible for management, or management of the farm business has been transferred to a person younger than the person currently responsible for management, or, that transfer of management is only conditional upon grant of planning permission for the dwelling. The younger person should demonstrate majority control over the farm business and be the decision maker for the farm business; or
 - b) there is an existing functional need for an additional 0.5 or more of a full time worker;
 - c) the enterprise and activity concerned has been established for at least three years and both the enterprise and the business need for the job, are financially sound, being profitable for at least one of them with a clear prospect of remaining so for a reasonable period of time. Evidence of actual or potential economic performance will be required. To assess economic sustainability it will be necessary to show the business has a reasonable prospect of providing a market return for all operators for the amount of management and manual labour inputs, including the job for which the rural enterprise dwelling is being sought, for at least five years from the anticipated completion of the proposed development. This should be assessed on the basis of what is a realistic income for the skills of the operator. A financial test is also necessary to assess the size of dwelling which the enterprise can afford to build and maintain. The requirements of the enterprise rather than of the owner or occupier will determine the size of dwelling that is appropriate. Dwellings which are unusually large in relation to the needs of the enterprise, or unusually expensive to construct in relation to the income it can sustain in the long-term, will not be permitted.
 - d) the functional need could not be fulfilled by another dwelling or by converting an existing suitable building, or any other existing accommodation;
 - e) It must also be demonstrated that the management successor or part time worker is critical to the continued success of the farm business, and that the need cannot be met in any other reasonable way, e.g. through the re-organisation of labour responsibilities.
- 6.151 In considering proposals, ENPA will need to be satisfied that there is no existing accommodation including through the extension and/or subdivision of an existing dwelling or through the conversion/change of use of existing buildings (or any of these have recently been sold which could have met the need) or the use of a temporary caravan that can be used to meet the needs of a resident worker. ENPA may investigate the history of the enterprise to establish the recent pattern of use of land and buildings (a sale may constitute evidence of lack of need) and why labour or

³²² ENPA (2011) Local Plan Options (November 2011) [Online] http://www.exmoor-nationalpark.gov.uk/data/assets/pdf_file/0004/251536/Local-Plan-Options-Consultation-Document.pdf

residential arrangements cannot be re-organised to ensure that the existing accommodation meets the needs of the enterprise without the need for a further dwelling.

- 6.152 The policy will only apply to the first additional dwelling to be attached to an established farm after the adoption of this Plan and not to subsequent succession farm dwellings. Further new build dwellings will only be permitted where there is a full agricultural justification.
- 6.153 ENPA may attach a condition removing permitted development rights for extensions, which could result in the size of a dwelling exceeding what could be justified by the functional requirement, and which could affect the continued viability of the property for its intended use. A planning obligation will be secured tying the dwelling(s) to the holding or business to ensure that dwellings are not disposed of separately from the business as a whole. ENPA may, where necessary, attach a condition upon any other existing dwellings on the holding, restricting the occupancy to those engaged in agriculture, forestry or other business.

HC-D10 SUCCESSION FARMING - SECOND DWELLINGS ON ESTABLISHED FARMS

- 1. New housing to meet the needs of succession farmers in the open countryside will be in accordance with HC-D7 or HC-D8. A new second dwelling within the open countryside will only be permitted where:**
 - a) the accommodation is designed to meet an existing proven functional need for an additional 0.5 or more of a full time agricultural worker to live permanently at their place of work on an established enterprise;**
 - b) the business is proven to be financially viable in the long term, it is extensive in nature and where the farming activity contributes to the conservation or enhancement of the natural beauty and wildlife of the National Park and is in accordance with the tests set out in Annex 2 of this Plan;**
 - c) a planning obligation will require that there are secure and legally binding arrangements in place to demonstrate that the farm business is jointly held or management of the farm business has been transferred to a person younger than the person currently responsible for management, or that transfer of management will take place on planning permission being granted for the dwelling;**
 - d) the need cannot be met in any other way including through the re-organisation of labour responsibilities;**
 - e) the design and layout of the development meet the requirements of Policy CE-S6 and the net floorspace will be in accordance with HC-S2; and**
 - f) a planning condition is attached to ensure that occupancy of the dwelling(s) is confined to rural workers in accordance with Policy HC-D9.**
- 2. The policy will apply only to a single additional succession farm dwelling to be attached to an established farm after adoption of this Plan. Permission will not be granted for subsequent succession farm dwellings on the holding.**

RESIDENTIAL CARAVANS

- 6.154 The siting of mobile homes or static caravans in the open countryside of the National Park causes significant landscape harm by reason of the adverse impact on landscape character and visual amenity due to their design and form of construction. Such structures are therefore not considered acceptable as permanent residential accommodation in the National Park. This approach is consistent with policy RT-D8 Static Caravan Sites.
- 6.155 However, temporary (time-based) proposals to site a mobile home, static caravan or other temporary dwelling for rural land-based business reasons, will be considered in accordance with HC-D9 Rural Workers, namely to allow time for the sustainability of a business to be tested.
- 6.156 The siting of mobile homes or static caravans on a temporary basis should be closely located to existing buildings related to the land-based business as part of the functional need to demonstrate that workers will need to be readily available to attend to the business at most times. Specific consideration will be given to the visual impact of the structure and its potential impacts on landscape character and nature conservation interests. Applicants should therefore submit a landscaping scheme as part of any proposal to demonstrate how the structure can be effectively screened and impacts on the surrounding landscape character minimised (CE-D1 Protecting Exmoor's Landscapes and Seascapes). Siting should also take account of access and parking requirements, connection to utility services and avoidance of flood risk.
- 6.157 The National Park Authority will monitor the occupancy of all temporary residential structures and ensure that no additions to the mobile/home caravan or ancillary structure are erected that change its status from a temporary structure to a building.
- 6.158 A condition will be attached to any temporary planning permission to ensure the static caravan or mobile home is removed from the site at the end of the period stated, and the land restored to its former condition, including the removal of all ancillary works and structures. The occupancy will also be restricted to named persons and their dependents.

HC-D11 RESIDENTIAL CARAVANS

- 1. The siting of residential caravans, mobile homes or other temporary structures for use as permanent residential accommodation in the open countryside will not be permitted.**
- 2. Permission will only be granted on a temporary basis where specific circumstances apply in relation to a proven essential need for a rural worker for the caravan in accordance with tests set out in policy HC-D9 Rural Workers and where it is demonstrated that:**
 - a) there is a clear intention to develop the rural land-based business;**
 - b) the functional need could not be met by an existing dwelling on site or within the local area;**
 - c) the structure, including access and parking arrangements, can be easily accommodated without adversely impacting on landscape character, visual amenity, sensitive habitats and wildlife species; and**
 - d) the site is not located in an area at risk of flooding.**
- 3. Planning conditions will be attached to a planning permission or an obligation secured, to ensure that any permissions:**
 - a) are for a time-limited period only;**
 - b) are confined to persons and their dependents able to demonstrate the essential need for the accommodation; and**
 - c) clearly state that when the time period for the accommodation expires, the temporary residential structure shall be removed from the site and the land restored to its former condition within a specified period.**

REPLACEMENT OF RURAL WORKERS OCCUPANCY CONDITIONS

- 6.159 The workforce needs of individual agricultural, forestry or other rural land-based enterprises change. Where the specific 'rural worker' occupancy is no longer required for a particular holding or business, the existing dwelling can still play an important role in meeting the needs of qualifying workers in the local area (HC-S3 Local Occupancy Criteria).
- 6.160 Existing dwellings permitted prior to the adoption of the Local Plan with an agricultural or forestry worker condition or planning obligation will be permitted to alter the occupancy condition or vary the planning obligation to include rural workers, as defined in Annex 2 Rural Land Based Worker Dwellings, where the Authority considers the reasons for replacing the existing occupancy tie to be acceptable (i.e. where there is no longer an identified need on that holding). This may allow some flexibility in relation to the range of rural workers that are linked to rural land-based enterprises including circumstances where the nature of the rural land-based enterprise has changed.
- 6.161 Applications for the removal of a 'rural worker' or 'succession farming' occupancy condition will be rigorously assessed. This will include examining how long the property has been built/converted and occupied by a rural worker or extended farming family (in relation to succession farming). The National Park Authority will require evidence that appropriate steps have been taken to try to sell or rent the property with the occupancy condition at a price reflecting the condition and potential market. If after a reasonable period, of a minimum of twelve consecutive months, the property has not been sold or let, then permission to remove the condition and replace it with a local need affordable occupancy agreement in accordance with policies HC-S1 and HC-S3, may be permitted.
- 6.162 In appropriate cases, the National Park Authority will favourably consider the subdivision of larger dwellings to ensure that a dwelling permitted as an exception remains available to local persons in need of affordable accommodation (HC-D14 Subdivision of Existing Dwellings clause 3). Holiday let accommodation may be considered as a temporary solution until there is a qualifying permanent resident.

HC-D12 REPLACEMENT OF RURAL WORKERS OCCUPANCY CONDITIONS

- 1. Proposals for the alteration of a condition, or variation of a planning obligation, which restricts the occupancy of a dwelling to a person employed or last employed in agriculture or forestry (permitted prior to the adoption of the Local Plan) to include the occupancy of a dwelling by a rural worker (as defined in Annex 2) employed in the locality will be permitted where the need has become redundant on that holding.**
- 2. The removal of a condition, or variation of a planning obligation, which limits the occupancy of a dwelling to a person employed or last employed in agriculture or forestry (prior to the adoption of the Local Plan), for a rural worker as identified in policy HC-D9, or for succession farming as identified in policy HC-D10, will be permitted where it can be demonstrated that:**
 - a) reasonable attempts have been made to allow the dwelling to be used by a person who could occupy it in accordance with the condition or obligation; and**
 - b) the long term need for the dwelling in the locality, in accordance with the condition or obligation, has ceased and removing the condition would be more appropriate than a temporary relaxation.**
- 3. Where, permission is granted for the removal of the occupancy condition or variation of a planning condition identified in clause 2, the occupancy of the dwelling will be limited by agreement to a person(s) in local affordable housing need as defined in Policy HC-S3.**
- 4. Where a local person cannot be found to occupy the dwelling, temporary permission will be given, on a personal basis, to let the dwelling for non-serviced accommodation until such time as a rural worker or a local affordable housing need arises. A holiday occupancy condition will be attached to any temporary permission granted.**

REPLACEMENT OF HOLIDAY OCCUPANCY AND EXTENDED FAMILY OCCUPANCY TIES

- 6.163 On Exmoor, there is a considerable stock of self-catering holiday accommodation where the occupancy is restricted for the purposes of holiday letting. These units have been provided predominantly through the conversion of traditional buildings outside settlements.
- 6.164 Given that one of the key objectives of housing provision is to minimise new build housing development on greenfield land, by re-using existing buildings, there is an opportunity to utilise the resource of those buildings converted as holiday lets, to provide accommodation for local people in affordable housing need. This may be of particular value in the open countryside where most holiday lets have been permitted historically and because a large proportion of Exmoor's workforce is based on part-time employment (33% of people in employment work part time)³²³. This approach, presents an opportunity for a local need affordable dwelling where the tests for new-build housing under policies HC-D9 Rural Workers or HC-D10 Succession Farming cannot be met.

³²³ Office for National Statistics (2013) - 2011 Census, Key Statistics for National Parks in England and Wales.

- 6.165 For holiday-lets subject to a holiday occupancy condition, a flexible approach to accommodate local housing needs will be taken to accommodate the replacement of holiday occupancy conditions with an agreement which will limit the occupancy to persons:
- a) in affordable housing need who meet the local occupancy criteria in policy HC-S3 and where the location accords with policy HC-D1 Conversions to Dwellings in Settlements or HC-D7 Conversions to Dwellings in the Open Countryside; or
 - b) who meet the criteria for extended family dwellings in policy HC-D4 Extended Family Dwellings.
- 6.166 Additionally, for those dwellings permitted as extended family homes in accordance with policy HC-D4, permission may be granted to vary the occupancy to persons in affordable housing need who meet the local occupancy criteria in policy HC-S3, or where the requirements of policy RT-D4 Non-Serviced Accommodation are met, the occupancy may be limited to short-term holiday occupancy.
- 6.167 Measures will be put in place to ensure that the use of the unit can be occupied as the permitted use or as the original use. This allows flexibility to revert to either self-catering accommodation with a holiday occupancy condition or as extended family accommodation through a planning obligation without the need to apply for planning permission.

HC-D13 REPLACEMENT OF HOLIDAY OCCUPANCY CONDITIONS AND EXTENDED FAMILY OCCUPANCY TIES

1. **Permission will be granted for the replacement of a holiday occupancy condition with an agreement limiting occupancy to:**
 - a) **local persons in affordable housing need where the occupants meet the requirements of policy HC-S3; or**
 - b) **persons meeting the requirements of extended family accommodation in accordance with policy HC-D4 Extended Family Dwellings.**
2. **In accordance with clause 1 it should be demonstrated that:**
 - a) **there is a local need for the accommodation; and**
 - b) **the building is capable of being permanently occupied without the need for any major reconstruction, extension or alteration that could be harmful to the character of the building or the amenity of neighbouring properties; and**
 - c) **sufficient curtilage space can be provided without harming the setting of the building or surrounding landscape character.**
3. **For residential units where occupancy is restricted to extended family accommodation (HC-D4) permission will be granted for the replacement of the occupancy tie to:**
 - a) **local persons in affordable housing need where the occupants meet the requirements of policy HC-S3; or**
 - b) **occupancy as a holiday let in accordance with policy RT-D4 Non Serviced Accommodation.**

SUBDIVISION OF EXISTING DWELLINGS

- 6.168 The sub-division of existing dwellings is a flexible approach that can help provide a solution to Exmoor's long term housing needs through providing smaller more affordable homes within the National Park. Consultation has shown that subdivision is considered to be an important option that makes efficient use of existing buildings and provides homes that can help address the needs of local communities such as to enable older people to downsize, or allow extended families to live independently but provide support where required e.g. care for older people or help with childcare arrangements³²⁴.
- 6.169 This policy only applies to existing residential dwellings (Use Class C3) at the time of adoption of the Local Plan. A condition will be attached to any planning permission removing any permitted development rights granted for extensions by the Town and Country Planning (General Permitted Development) Order 2015, to help retain a range of smaller, lower cost dwelling units (HC-S2). Proposals for extensions that would take subdivided dwellings above 90sqm will not normally be permitted. For existing dwellings with no occupancy tie the new dwelling unit created through the subdivision of the property will be a principal residence dwelling in accordance with policy HC-S4 Principal Residence Housing.
- 6.170 Registered Providers can also play a valuable role in sub-dividing existing properties within settlements to create smaller units of affordable accommodation to help meet the housing needs of the community.
- 6.171 The main considerations will be the impact an additional dwelling may have on the natural and built character of the area as well as impacts on local amenity, and nearby residents or other neighbouring uses. Such considerations are likely to include whether there are sufficient parking arrangements, or private amenity space available and any potential impacts caused by increased vehicular use.
- 6.172 Where a building is considered to be of historic or architectural merit, careful consideration will be given to the impact that any proposed alterations may have on the historic character of the building and its setting.
- 6.173 For those dwellings that have a local affordable occupancy tie to restrict the occupancy to person in local affordable housing need, subdivision will only be permitted where sufficient habitable space is created. In such cases the Authority would require the new unit(s) of accommodation to have the same occupancy tie.
- 6.174 Dwellings with an agricultural, rural worker, or succession farming occupancy tie are permitted in the open countryside as an exception and therefore will only be permitted to subdivide to create a new unit of accommodation where the occupancy of the new dwelling unit is for a proven need for a rural worker in accordance with HC-D9, for a succession farming dwelling in accordance with HC-D10 or where the additional unit(s) created will have a local affordable occupancy tie (HC-S3 Local Occupancy Criteria).

³²⁴ ENPA (2010) Your Future Exmoor (YFE) consultation events January – March 2010

HC-D14 SUBDIVISION OF EXISTING DWELLINGS

- 1. Proposals for the subdivision of existing residential dwellings will be permitted where:**
 - a) there would be no adverse impact on the character of the area, amenity of neighbouring occupiers, or highway safety;**
 - b) any necessary alterations will not adversely affect buildings of historic and/or architectural merit (CE-S4, CE-D3); and**
 - c) any additional units created will be principal residence housing and subject to a condition limiting its occupancy to a person as their only or principal home (HC-S4).**
- 2. Where a property has a local affordable occupancy tie, any subdivision would require that the new unit(s) created would retain the same occupancy restriction.**
- 3. Proposals to subdivide a dwelling with a rural worker or succession farming occupancy tie will only be permitted where:**
 - a) the additional unit(s) created will be occupied in accordance with HC-S3 Local Occupancy Criteria; or**
 - b) the additional unit(s) created will be occupied in accordance with the requirements for HC-D9 Rural Workers Dwelling or HC-D10 Succession Farming.**

RESIDENTIAL EXTENSIONS

- 6.175 The role of this policy is to provide reasonable flexibility for dwellings to be updated and extended whilst ensuring that the impacts of extensions are acceptable and retain a mix of dwelling sizes that will help to sustain balanced communities across the National Park. The overall size and design of extensions should not be excessive to ensure that the character of the surrounding landscape, individual buildings and settlements is conserved or enhanced.
- 6.176 The National Park Authority will require that extensions are sympathetically designed and proportionate in scale, bulk and form to the original dwelling, consistent with policy CE-S6 Design and Sustainable Construction Principles and CE-D4 Extensions. A floorspace increase of 35% will be used and proposals for extensions which individually or cumulatively (taking account of previous extensions - including those built with permitted development rights) increase the floorspace of the original dwelling beyond this range are unlikely to achieve the aims of the policy.
- 6.177 For the purposes of implementing the policy, floorspace shall be measured externally and shall include enclosed porches and conservatories. The 'original dwelling' is the dwelling as it existed on 1 April 1974 or as constructed if this was a date after 1 April 1974 (this being the date when the discharge of planning responsibilities was transferred to the National Park Committee of Somerset County Council).
- 6.178 Extensions for dwellings that are subject to an occupancy tie to ensure they meet the local community's need for affordable (or more affordable housing) will not be permitted where they would exceed 90sqm net internal floorspace. This is because such homes have been permitted to provide an opportunity for local people, unable to afford to buy a home on the open market, to build their own owner-occupied homes. Together with the local need occupancy tie, the size of these dwellings ensures that these homes remain more affordable for local people in perpetuity.
- 6.179 It is considered that dwellings that are unauthorised or immune from enforcement action, including those that have been granted a Certificate of Lawful Use or Development should not benefit from further enlargement through extensions or alterations. Temporary dwellings, such as those considered to be essential to support a rural land-based business and granted permission for a period of three years, will also not be permitted to extend.

- 6.180 Extension proposals exceeding 35% will only be justified if it can be demonstrated that the extension would significantly enhance the character and appearance of the existing dwelling and its surroundings, and is clearly of the highest quality in terms of its construction and design; or if the extension is a conversion scheme of an existing building that is clearly demonstrated to be within the domestic curtilage.
- 6.181 Changes to permitted development rights have meant that the rules concerning extensions, improvements and alterations a householder can make to their house without the need for a planning application have been altered³²⁵. Some dwellings may also have permitted development rights withdrawn. Further information can be found on the Planning Portal³²⁶. To avoid doubt, given the variations for permitted development rights within National Parks, applicants are advised to contact the National Park Authority in the first instance³²⁷.
- 6.182 In terms of extending the residential curtilage of a property, careful consideration should be given to the impact the change of use of the land to a residential use (e.g. from agricultural grazing land) may have on the surrounding area in terms of its visual appearance in the wider landscape, and its impact on landscape and/or settlement character. Proposals should particularly have regard to the settlement form and the use of traditional boundary treatments that reflect the historic character of the area.

HC-D15 RESIDENTIAL EXTENSIONS

- 1. Proposals for residential extensions will be permitted where they:**
 - a) accord with the principles set out in CE-S6 Design and Sustainable Construction Principles and CE-D4 Extensions;**
 - b) ensure there is sufficient space within the existing curtilage to accommodate the extension without resulting in overdevelopment of the site or adversely impacting on residential amenity space and parking provision;**
 - c) are not disproportionate to the original dwelling and in any case do not increase the external floorspace of the original dwelling by more than 35% (taking into account any extensions provided through permitted development rights); and**
 - d) ensure the maintenance or replacement of any bat and barn owl roosts that may be present.**
- 2. Residential extensions will not be permitted in the following circumstances:**
 - a) for dwellings where the size is restricted the proposed extension would exceed the net internal floorspace limitation – including local need affordable dwellings, extended family dwellings, succession farming dwellings, rural land-based worker dwellings and specialist housing for older people;**
 - b) for temporary dwellings; or**
 - c) for dwellings that are unauthorised or immune from enforcement action – including those dwellings which have had the benefit of a Certificate of Lawful Use or Development.**
- 3. Extensions to residential curtilages will only be permitted where it can be demonstrated that it will not adversely affect visual amenity, the setting of the residential building, and the surrounding landscape and/or settlement character of the area.**

³²⁵ HM Government (2015) Town and Country Planning (General Permitted Development) (England) Order 2015. *The Stationery Office, London.*

³²⁶ Planning Portal (2015) Permitted Development Rights [Online]
<http://www.planningportal.gov.uk/permission/responsibilities/planningpermission/permitted>

³²⁷ Article 2(3) land – land within a National Park, the Broads, an area of outstanding natural beauty, an area designated as a conservation area, and land within World Heritage Sites. As defined by:
 HM Government (2015) Town and Country Planning (General Permitted Development) (England) Order 2015. *The Stationery Office, London.*

OUTBUILDINGS

- 6.183 Policy HC-D16 applies to ancillary outbuildings within the domestic curtilage for a purpose incidental to a dwelling such as garages, garden sheds, greenhouses, workshops, and swimming pools. Home offices or stabling that may be proposed within the domestic curtilage should accord with the following policies:
- a) Proposals for buildings for the purpose of home working should accord with policy SE-D1 Home Based Businesses.
 - b) Proposals for horse-related development within the residential curtilage, such as stabling and tack rooms, should be consistent with RT-D11 Equestrian Development.
- 6.184 It is important that the number, scale and design of any buildings within the curtilage of a dwelling should not detract from the character or appearance of the dwelling, the site and the surrounding area, as the siting and design of outbuildings can potentially be as significant as any other built development. Care should be taken to ensure that the position and design of ancillary outbuildings safeguards the amenity of neighbouring occupiers. Proposals which would reduce the level of private amenity space, including parking provision, around the dwelling to an unacceptable level should be avoided, to prevent issues in the future such as the relocation of private parking to on-street parking in locations where public parking demand is high or where it could interrupt the flow of traffic.
- 6.185 Where the conversion of an existing building is proposed within the domestic curtilage the applicant will be required to ensure that the building's character and appearance is conserved or enhanced in accordance with policy CE-S5 Principles for the Conversion or Structural Alteration of Existing Buildings or CE-S6 Design and Sustainable Construction Principles.
- 6.186 The National Park Authority will need to be assured that the loss of existing outbuildings, such as garaging, to other uses will not result in subsequent proposals for additional new outbuildings which may result in overdevelopment of the site with potential adverse impacts on residential amenity and the character and appearance of the dwelling and surrounding area. Planning conditions limiting the use of the outbuilding to purposes incidental to the dwelling on the site will be attached to any planning permission.
- 6.187 Proposals that aim to provide primary living accommodation such as additional sleeping accommodation or extra living space will be considered under policy HC-15 Residential Extensions.

HC-D16 OUTBUILDINGS

- 1. Proposals for ancillary outbuildings within the domestic curtilage of a dwelling will be permitted where:**
 - a) in terms of scale and massing they are proportionate to the dwelling they are to serve;**
 - b) there is no unacceptable adverse impact on the character, appearance or setting of the existing dwelling, the surrounding landscape, or the amenity of neighbouring occupiers by reason of their siting and design in accordance with policy CE-S6;**
 - c) in the case of the conversion of an existing building, the character and appearance of the building is conserved in accordance with policy CE-S5; and**
 - d) private amenity space around the dwelling will not be reduced to an unacceptable level.**
- 2. Any element of the proposal that pertains to primary living accommodation should accord with the requirements of policy HC-D15 Residential Extensions.**

REPLACEMENT DWELLINGS

- 6.188 Applications for replacement dwellings often come forward where an existing dwelling is in disrepair. In many cases such dwellings are of timber construction, modest in size and built prior to the introduction of planning control. Listed buildings or dwellings that are considered to be of historic importance will not be considered for replacement (CE-S4 Cultural Heritage and, CE-D3 Conserving Heritage Assets). The Exmoor National Park Historic Environment Record has an extensive source of information that includes the historic built environment and can provide useful evidence for applicants proposing to replace an existing dwelling. Where the residential use has been abandoned, any proposals will be assessed against policies for new build residential dwellings (HC-D2 and HC-D8).
- 6.189 Applicants should demonstrate that the existing building adversely affects the landscape or built character of the area. Dwellings recently destroyed by accident/fire will be eligible for replacement.
- 6.190 Replacement by a new dwelling of modern building and energy efficiency standards demands particular attention to design and siting (CE-S6 Design and Sustainable Construction Principles) to avoid harm to the landscape and character of the area, including providing vehicular access and establishing a domestic curtilage. The replacement dwelling should be sited on or close to the existing footprint of the building unless the benefits that may be achieved for landscape character, wildlife or cultural heritage can justify the replacement dwelling to be sited in an alternative location. In such situations, locations that are inherently more sustainable will be favoured such as replacing a remote substandard dwelling in the open countryside with a dwelling in a nearby settlement.
- 6.191 The replacement dwelling should be of a similar scale, massing and floorspace as the original dwelling to avoid any adverse harm to landscape character and visual amenity; where existing dwellings have a net internal floorspace below 90sqm, the proposed replacement should not exceed 90sqm. In terms of policy HC-D17 the 'original dwelling' is the dwelling as it exists at the point of application to the National Park Authority. This approach will help to ensure that a stock of smaller, more affordable dwellings remains in the National Park.
- 6.192 Conditions will be attached to any permission granted to remove permitted development rights in relation to extensions on replacement dwellings less than 90sqm to ensure they are more affordable to local people. For replacement dwellings larger than 90sqm, the 35% extension allowance should not be factored in to the proposals for the replacement dwelling as this would result in a considerably larger dwelling in terms of scale and massing than the existing dwelling on site. A separate application would be required for any subsequent extension to the replacement dwelling (unless within permitted development rights) to ensure that the design does not adversely impact on the surrounding landscape or settlement character, and the amenity of neighbouring occupiers in accordance with policies CE-D4 Extensions and HC-D15 Residential Extensions.
- 6.193 A condition will also be attached to any planning permission to ensure that where the existing building is not demolished prior to construction, it is removed from the site prior to the replacement building being occupied or up to 3 months after first occupation for family homes in accordance with CC-S6 Waste and Resource Management.
- 6.194 Proposals will need to be acceptable in respect of parking and access in accordance with Policies AC-D1 Transport and Accessibility Requirements for Development, and AC-D3 Parking Provision and Standards.

HC-D17 REPLACEMENT DWELLINGS

- 1. Proposals for the erection of a replacement dwelling will be permitted where the existing dwelling:**
 - a) is not listed or considered to be of historic or architectural importance worthy of conservation;**
 - b) has an adverse impact on the character and visual amenity of the area; and**
 - c) the residential use has not been abandoned.**
- 2. The proposed replacement dwelling should:**
 - a) be sited on or close to the footprint of the existing dwelling, unless alternative siting would provide benefits for landscape, wildlife or cultural heritage ;**
 - b) be no larger in size than the original dwelling or 90 square metres net internal floorspace, whichever is the larger;**
 - c) reflect the massing and scale of the original dwelling; and**
 - d) accord with the design and sustainable construction requirements of policy CE-S6.**
- 3. Where permission is granted, conditions will be attached to:**
 - a) remove permitted development rights granted by the Town and Country Planning (General Permitted Development) Order 2015 in respect of extensions on dwellings of less than 90 square metres to ensure they do not exceed this size; and**
 - b) ensure that the existing dwelling is demolished and removed from the site prior to or within 3 months of the replacement dwelling first being occupied.**

TRAVELLING COMMUNITIES

- 6.195 The accommodation requirements of travelling communities, who include gypsies, travellers and travelling show people are part of the overall accommodation needs to be addressed across a local planning area and considered alongside the housing needs of settled communities.
- 6.196 National Government aims to ensure fair and equal treatment for travellers in a way that facilitates their traditional and nomadic way of life while respecting the interests of the settled community. National planning policy highlights the importance of ensuring that traveller sites are sustainable, recognises that some areas may have special or strict planning constraints and that local planning authorities have a duty to co-operate on planning issues that cross administrative boundaries.
- 6.197 Working collaboratively with neighbouring local planning authorities, authorities should set pitch targets for gypsies and travellers and plot targets for travelling show people which address the likely permanent and transit site accommodation needs of travellers in their area. Where there is no identified need, criteria-based policies should provide a basis for decisions on any applications which may come forward.
- 6.198 In rural areas, local planning authorities should, where viable and practical, consider allocating and releasing sites solely for affordable traveller sites, including using a rural exception site policy for traveller sites to enable the use of small sites in small rural communities that would not normally be used. Such sites should be used in perpetuity specifically and only for affordable traveller sites to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection, whilst also ensuring that rural areas continue to develop as sustainable, mixed, inclusive communities.
- 6.199 An assessment of gypsies and travellers for a partnership of Devon local planning authorities including the whole of Exmoor National Park was completed in 2015³²⁸. The study identified the level of accommodation need and demand for each local planning authority within the partnership area. For Exmoor National Park the evidence demonstrates that there is no demonstrable need for permanent or transit pitches to 2034, nor is there any requirement for additional housing to meet 'bricks and mortar' needs of travelling communities.
- 6.200 Because no demonstrable need was identified within the National Park, this Plan includes a criteria based policy and does not include pitch or plot targets or sites.
- 6.201 As a result of concerns over the landscape impacts of residential caravans or mobile homes in a National Park, if a future local need for traveller sites is identified, the policy seeks to accommodate that need outside the National Park and the National Park Authority will work closely with local housing authorities to achieve this. Nevertheless, this Local Plan sets out an approach which acknowledges small scale provision may be justified in exceptional circumstances. Consistent with the conservation and enhancement of the National Park duty to local communities, and the overall approach to housing in Exmoor, a rural exception site policy approach will be used to seek to address the proven needs of the local community for small traveller sites where they can be accommodated without harm to the National Park (including sensitive habitats and wildlife) and in accordance with GP3 Spatial Strategy, well related to existing buildings in or adjoining settlements. The forthcoming Exmoor Housing SPD will provide further guidance, including on assessment of local connection. Assessment of landscape impact will be required including to take into

³²⁸ RRR Consultancy Ltd (2015): Devon Partnership Gypsy and Traveller Accommodation Assessment 2015 Final Report

account the variations in tree and hedgerow cover through the seasons and a landscaping scheme to ensure a development is screened effectively.

- 6.202 The policy requires that a site should respect the principles of sustainable development, and not result in undue pressure on local infrastructure and services. This will include the provision of suitable water and sewerage infrastructure to ensure there will be no adverse impacts on water resources or air quality. Identification of sites will need to consider flood risk issues as caravans are classed as a vulnerable form of development and proposals will therefore need to accord with Policy CC-D1 Flood Risk.

HC-S5 TRAVELLING COMMUNITIES

- 1. To ensure that the travelling communities' traditional and nomadic way of life is recognised, where an identified need for caravans or mobile homes for travelling communities can be demonstrated, the National Park Authority will work with the relevant housing authorities to appropriately address that need. Exceptionally, small sites may be permitted where:**
 - a) there is a proven local need for a site to accommodate the affordable need of travelling communities who have a proven local connection through employment, longstanding residency or family, in the parish or adjoining parish;**
 - b) there are no suitable sites that can meet the need outside the National Park boundary;**
 - c) the site will respect the principles of sustainable development, be located in a named settlement in accordance with GP3, be well-related to existing buildings, conserve or enhance the settlement character and pattern, and be accessible to appropriate health and educational facilities;**
 - d) the application is accompanied by a landscaping scheme that secures effective screening of the caravans or mobile homes;**
 - e) there are no impacts on sensitive habitats and wildlife that cannot be mitigated for;**
 - f) the interests of the settled community will be respected and not result in undue pressure on local infrastructure and services; and**
 - g) a planning obligation will be secured to ensure the site will be affordable to local travelling communities and will remain so in perpetuity.**

COMMUNITY SERVICES AND FACILITIES

Objective 11. *To enable Exmoor's communities and partnerships to plan development in their neighbourhoods to help meet their needs and aspirations while conserving the special qualities of the National Park.*

Objective 13. *To improve the sustainability, resilience and self-sufficiency of the National Park's settlements by supporting the retention, provision of, and access to community services and facilities.*

CONTEXT

- 6.203 The National Park Authority recognises the important role of community services and facilities within Exmoor communities and for those who visit the National Park and is supportive of maintaining and enhancing their provision. The Authority will seek to work with County Councils, District Councils, Parish and Town Councils and local communities to achieve this objective.
- 6.204 National policy³²⁹ aims to ensure strong, vibrant, healthy and inclusive communities with accessible local services that reflect the community's needs by planning positively, to retain (or safeguard), and develop the range of local social, health, recreational and cultural facilities and services, to help to meet the day to day needs of local communities.
- 6.205 Whilst guarding against the loss of services and facilities, existing shops, services and facilities should be able to develop and modernise in a sustainable way so that they can be retained for the benefit of the community.
- 6.206 Evidence has shown that for a rural area with small settlements, Exmoor National Park already supports a comparatively strong and diverse commercial services sector, such as shops, cafés and restaurants, and retains a range of other important services and facilities such as schools, doctors' surgeries and petrol stations. Problems associated with the provision of services in rural areas are well documented regarding the loss of services such as shops, post offices, pubs, schools and petrol stations and lower levels of public transport provision resulting from public sector cuts. Despite such problems, Exmoor benefits from active and dedicated communities that work together to achieve positive benefits including community-run shops at Wootton Courtenay and Brompton Regis and the refurbishment of Bridgetown village hall by local residents. Community and parish plans have emphasised the importance of services and facilities in their settlements and a number have been registered with district councils as Assets of Community Value.
- 6.207 There is a high level of support for retaining existing community services, including out-reach services, and ensuring there is flexibility so that a range of services can continue to be provided in communities such as in a single premises. The need for improving and providing for open space and recreation facilities in communities is also evident³³⁰. Some settlements on Exmoor link together in terms of the collective services and facilities they provide – communities can become stronger and more resilient when they operate as a cluster or network in order to sustain or develop joint facilities in the most sustainable location – e.g. the village hall at Monksilver also serves the communities of Elworthy and Nettlecombe (EMN Hall).
- 6.208 Without local service provision, some older people, people with disabilities or limiting long term illnesses, and those without access to private transport³³¹ often have to move to surrounding towns for their transport, care needs and access to services;

³²⁹ DCLG (2012) National Planning Policy Framework (paragraph 7) – Department of Communities and Local Government

³³⁰ ENPA (2015) Exmoor National Park Open Space Assessment. *Exmoor House, Dulverton*

³³¹ Office for National Statistics (2013) - 2011 Census, Key Statistics for National Parks in England and Wales – 28.2% of households with at least one person with a long-term limiting illness, 11.8% of households do not have a car/van

those who remain can become excluded from many social activities. Access to services and facilities tends to be difficult for those without access to private modes of transport. Health and social welfare issues are a priority in dispersed rural areas such as Exmoor. An increasingly older population is likely to put pressure on local social services and healthcare, whilst the viability of other services, such as local schools may be threatened – other policies in this plan will help to meet the affordable housing needs of the local community and key workers including those in need of specialist housing (HC-S1 Housing).

- 6.209 Across most of Exmoor, the local service sector is dominated by local independent traders. The National Park's Local Service Centres: Dulverton, Lynton/Lynmouth and Porlock are settlements with most shops and services; having high levels of both convenience (food) and comparison (non-food) shops. These shops are complemented by pubs, cafés, and restaurants. This range of services is a consequence of visitor spend, the relative remoteness from larger towns, and the reliance of surrounding communities. These factors reinforce each other as, for example, convenience stores will be bigger and offer a wider range of goods because of additional visitor spend which also benefits residents, supports jobs and has a positive knock-on effect for the local economy. Tourist expenditure can therefore help to support (and keep open) shops and services which may not be supported by local residents' expenditure alone.
- 6.210 Other settlements in the National Park, particularly to the west of the A396, are dispersed and relatively remote from larger settlements outside of the National Park. This appears to have enabled the retention of local services such as shops, post offices, pubs and petrol stations well above what might be expected for settlements of this size. This aspect of the National Park's settlements is important for local communities and visitors, and helps to protect and enhance local services³³². With limited public transport the private car is important to many for shopping and accessing local services and facilities on Exmoor.
- 6.211 Schools, including pre-schools, are an essential community service important for child and family well-being and a focal point where people regularly interact. They also provide a venue for extended services, and offer facilities such as sports fields/pitches for community use.
- 6.212 A high level of support was demonstrated³³³ for the protection of local services as well as, for the multi-functional use of existing buildings to provide a range of services and facilities to help increase the viability of services at risk of closure. Although, policies in this plan cannot ultimately protect against the loss or closure of community services and facilities, the change of use can be managed where permitted development rights do not apply³³⁴. Community action and setting up not-for-profit enterprises have been significant in maintaining key services and facilities in some Exmoor communities.
- 6.213 The provision of new or extended community services and facilities is supported where it is demonstrated to meet the needs of those communities and rural residents – this may be identified through a community-led or parish plan. Proposals which represent community views or are proposed on behalf of the community will be taken into account in demonstrating the need for a new or extended service or facility.
- 6.214 Proposals which reuse existing buildings (CE-S5 Principles for the Conversion or Structural Alterations of Existing Buildings) or support a multipurpose service or facility will be encouraged to maintain service provision and community cohesion. Preference

³³² GVA & C4G (2011) Quantitative Needs Assessment – West Somerset Council and Exmoor National Park Authority

³³³ ENPA (2010) Your Future Exmoor (YFE) consultation events January – March 2010

³³⁴ HM Government (2015) Town and Country Planning (General Permitted Development) (England) Order 2015. *The Stationery Office, London.*

will be given to the conversion of traditional buildings, however, where this is not possible the conversion and change of use of non-traditional buildings will be considered in accordance with GP4 The Efficient Use of Land and Buildings. New community facilities, such as village halls, should be designed to ensure that wider community service provision, such as 'out-reach' services and flexible meeting spaces, to serve local groups and societies can take place. The medical centre in Dulverton that opened in 2009 has enabled the GP practice and dental surgery to be located in one building with capacity for external health practitioners.

- 6.215 The Exmoor National Park Open Space Assessment³³⁵ evaluates the amount, distribution and quality of existing open amenity space within communities across the National Park; including:
- a) Parks and gardens (including designed landscapes)
 - b) Outdoor sports facilities
 - c) Provision for children and young people
 - d) Allotments
 - e) Churchyards and cemeteries
 - f) Green corridors
 - g) Amenity green space
- 6.216 Policies HC-S6, HC-D18 and HC-D19, support the provision and retention of new outdoor recreation areas and publicly accessible amenity spaces (as listed above) and the retention of existing outdoor recreation and amenity areas as identified on the Policies Map and in Annex 3 Important Open Space in Allerford and Luccombe. When submitting an application for additional open amenity space and outdoor sport and recreation facilities, the need for such development within the named settlements should be established through the evidence provided within the Exmoor National Park Open Space Strategy or other sources of evidence including community related information. Communities can also designate 'local green space'³³⁶ through the preparation or review of a Local Plan or Neighbourhood Plan. This designation can only be used where:
- a) the green space is in reasonably close proximity to the community it serves;
 - b) the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
 - c) the green area concerned is local in character and is not an extensive tract of land.
- 6.217 Local commercial services and community facilities in settlements on Exmoor include those defined by the following use classes:
- a) A1-A5: uses which includes local commercial services that serve Exmoor communities and visitors to the National Park and include shops (together with community shops), public houses, cafés, restaurants and takeaways;
 - b) D1: non-residential institutions e.g. health centres, day nurseries, schools, libraries, places of worship, village/ community halls and
 - c) D2: assembly and leisure e.g. indoor/outdoor sports and recreation facilities, cinemas and gyms.

³³⁵ ENPA (2015) Exmoor National Park Open Space Assessment. *Exmoor House, Dulverton*

³³⁶ DCLG (2012) National Planning Policy Framework (paragraphs 76-78) – Department of Communities and Local Government

6.218 The policies also apply to some sui generis uses (a use 'on its own' for which any change of use will require planning permission) within settlements and include petrol stations, public toilets, police stations, fire stations and public amenity spaces.

HC-S6 LOCAL COMMERCIAL SERVICES AND COMMUNITY FACILITIES

- 1. The National Park Authority will work with constituent local authorities, parish and town councils and communities to ensure that Exmoor's communities are sustained, the economy strengthened, and the needs of visitors addressed.**
- 2. The provision of new or extended local commercial services and community facilities will be supported where it can be demonstrated that they:
 - a) will benefit the local resident community and the needs of visitors; and**
 - b) are of a scale and location appropriate to the community they serve.****
- 3. For new developments or extensions to existing premises, preference will first be given to the reuse of existing traditional buildings (CE-S5). The re-use of non-traditional buildings (CE-S5), will be considered if enhancement of the built and natural environment can be achieved.**
- 4. New build developments should be located within Local Service Centres and Villages or, for community facilities where no suitable site exists, are well-related to these settlements. Proposals specifically for new build and ancillary local commercial services should be in accordance with policy HC-D18 Local Commercial Service Provision.**
- 5. Proposals enabling the enhancement of existing services and facilities, or the flexible use of new or existing buildings to allow a range of community services or facilities to take place on site will be encouraged – where this applies to an existing service the sharing of facilities should support the retention of the primary use.**
- 6. The provision of publicly accessible green space within or adjoining the named settlements will be supported.**
- 7. Local commercial services and community facilities will be safeguarded in accordance with policy HC-D19.**
- 8. Important visual amenity space identified within and adjoining the settlements will be protected in accordance with policy HC-D20.**

NEW LOCAL COMMERCIAL SERVICE PROVISION

6.219 Local Plan Policy HC-D18 provides a basis for new build local commercial services ('A' use classes), including modest improvements and additions, in the named settlements where proposals are of a scale, design and nature that accords with the character of the area. Proposals should complement the existing range of such services and not undermine the existing centres of settlements. Evidence³³⁷ shows that there is limited available expenditure to provide for significant growth within this sector.

LOCAL SERVICE PROVISION IN SETTLEMENTS

6.220 Policy HC-S6 supports, the reuse of existing buildings, and therefore in principle, may also include those buildings with an existing use including residential (with the exception of local need affordable housing), to enable a change to a local commercial service. The proposal should demonstrate that there are no other suitable, available,

³³⁷ GVA & C4G (2011) Quantitative Needs Assessment – West Somerset Council and Exmoor National Park Authority

existing premises in the locality. In order to encourage entrepreneurship, any changes of use from an existing use such as residential to local commercial services falling within A1 to A5 of the Use Classes Order permitted after the adoption of this Local Plan will have conditions attached to enable flexibility for the premises to operate either as the existing use or the local commercial service use.

- 6.221 In some circumstances, Exmoor National Park Authority may require submission of an impact assessment for any proposed local commercial service provision. The objective of an impact assessment is to measure and, where possible, quantify the impacts of proposals. In the case of small scale commercial services or extensions to existing services, an impact assessment is unlikely to be required. However, applicants should seek advice from the National Park Authority at an early stage to agree the need, scope for and level of detail of impact assessments in advance of applications being submitted. Key factors of an impact assessment should include the following:
- a) the need for the development,
 - b) the scale of development,
 - c) impacts of the development on trade, vitality and viability of the settlement and nearby centres and the degree of overlap, in terms of the range, type and quality of goods available, between the proposed development and other local commercial service uses both within the proposed settlement and if appropriate, nearby centres.
- 6.222 In considering all new local commercial services, Exmoor National Park Authority may use conditions to manage the impacts of development including to:
- a) prevent developments from being sub-divided into a number of smaller units;
 - b) ensure that ancillary uses remain subservient to the existing use within the development;
 - c) limit any internal alterations to increase the amount of gross floorspace by specifying the maximum floorspace permitted;
 - d) limit the range of goods sold, and to control the mix of convenience (food) and comparison (non-food) goods;
 - e) guard against adverse issues relating to traffic resulting from the development; and
 - f) guard against adverse impacts of the operation of the development on the amenity of neighbouring residents, such as the timing of the delivery of goods to shops and adequate provision for loading and unloading.
- 6.223 Where new local commercial services are granted planning consent, permitted development rights may be withdrawn to ensure that some changes of use³³⁸ will not apply in these circumstances. This is because it may result in the loss of services and facilities in smaller settlements where in many cases there may be very few or only one remaining service, such as a shop. The national change does not therefore fully reflect the role of services within a sparse rural area such as Exmoor National Park, where the retention of local services is essential to community well-being.

LOCAL COMMERCIAL SERVICES IN THE OPEN COUNTRYSIDE

- 6.224 Commercial services in the open countryside include farm shops selling local produce; such businesses can also provide for the needs of local communities which may offer a different range of goods from other shops nearby or provide a service where a village shop may not be viable.
- 6.225 The policy also allows for other services that may require a location outside the named settlements, including cafés and shops that are associated with visitor facilities, craft workshops, or camping/caravan sites. The provision of small-scale services in the

³³⁸ HM Government (2015) Town and Country Planning (General Permitted Development) (England) Order 2015. *The Stationery Office, London*. Part 4 of Schedule 2 to the General Permitted Development Order grants planning permission in respect of certain temporary buildings and uses.

open countryside should accord with the principles set out in SE-S3 (Business Development in the Open Countryside) to ensure a consistent approach with other forms of business development outside the named settlements. Applicants should demonstrate that the provision of these services will support the function of the existing business and will not adversely affect similar service provision within nearby settlements.

- 6.226 In certain circumstances permitted development rights apply to the change of use of agricultural buildings to A1, A2 and A3 uses³³⁹. For avoidance of doubt, applicants are advised to contact the Authority to ascertain whether a planning application is required. Where it is the National Park Authority's view that planning permission is required, then applications will be assessed against policy HC-D18.

MOBILE TRADING

Mobile trading occurs in several locations throughout the National Park and although this does not always require planning consent, the agreement of the landowner is needed. Where consent is required the National Park Authority will generally resist this activity on Exmoor, due to its visual intrusion, litter and impact on tranquillity; although there may be a case for specialist traders within the settlements. In cases where particular problems are being caused the National Park Authority will consider serving Article 4 Directions so the activity is brought under planning control.

HC-D18 LOCAL COMMERCIAL SERVICE PROVISION

- 1. Proposals for new build, extensions or change of use of buildings for local commercial service provision within the named settlements will be permitted where:**
 - a) the proposed location contributes to the overall vitality of the settlement and the local economy;**
 - b) they will not adversely affect the locality, National Park, or the amenity of nearby residents as a result of traffic or parking (AC-D1);**
 - c) if required by the National Park Authority, an impact assessment has been submitted, the scope of which has been agreed prior to submission; and**
- 2. Proposals for new local commercial service provision in the open countryside, through the reuse of existing buildings, will only be permitted in accordance with SE-S3 Business Development in the Open Countryside, and where:**
 - a) they are small scale ancillary retail development/operations principally offering for sale goods which are produced at the premises; or**
 - b) they principally comprise the sale of crafts and goods made on site, or shops and/or cafés which are ancillary to farms, visitor facilities, or camping and caravan sites; and**
 - c) they will not have adverse impacts on adjoining land uses; and**
 - d) it can be demonstrated that they will not adversely affect service provision in nearby settlements.**
- 3. Extensions to existing local commercial services will be permitted in accordance with policy CE-D4.**

³³⁹ HM Government (2015) Town and Country Planning (General Permitted Development) (England) Order 2015. *The Stationery Office, London*. Part 3 of Schedule 2.

SAFEGUARDING LOCAL COMMERCIAL SERVICES AND COMMUNITY FACILITIES

- 6.227 Policy HC-D19 seeks to safeguard both local commercial services including shops, cafés and public houses and community facilities in terms of their role in providing services and facilities for communities and visitors and in providing local employment.
- 6.228 In a dispersed rural area, such as Exmoor, the availability of community services and facilities are important socially and economically whilst helping to reduce the need to travel longer distances (see also policy AC-S1 Sustainable Transport). Therefore services should be safeguarded over the longer term.
- 6.229 Policy HC-D19 sets out criteria and a test of viability to enable the National Park Authority to assess a number of factors when determining a proposal for a change of use which may result in the loss of a service or facility. The policy also contains criteria against which proposals for change of use for specific uses within use classes will be considered. Any proposals for the change of use of local commercial services and community facilities should provide evidence to demonstrate there is no longer a need for a specific service or facility in the longer term, a suitable replacement service or facility is provided, or there is an existing similar facility accessible to the local community. Where a replacement service or facility is to be provided, a planning obligation will be used to ensure that the replacement facility is secured at an appropriate time in relation to changing the use of the existing facility. The representative views of the community will be taken into account in determining any proposals for the change of use of a community service or facility. Uses which are deemed to benefit the community will be considered favourably including other community uses, local affordable housing, or employment use.
- 6.230 In relation to clause 1d) of policy HC-D19 local commercial services, such as shops, pubs, cafés, (A class uses) or petrol stations (sui generis), will be required to demonstrate that all appropriate measures, including the opportunity for community not-for-profit schemes, have been taken to improve viability of the service before a change of use is proposed. In some cases the community may wish to consider taking over the business to be run as a community led-enterprise such as the Wootton Courtenay Villagers' Stores. Such initiatives and alternative approaches can enable a facility to remain open. Diversification of local commercial services may be considered to support the viability of businesses. Where the diversified use is incidental to the main use of the business and is of a nature and scale that compliments the current use, the National Park Authority is likely to be supportive of proposals. For example, some shops have diversified from solely retail to also provide refreshment facilities or pubs have provided space for a small convenience store. Conditions may be attached to any granting of planning permission to ensure that the diversified use remains ancillary to the main business (policy HC-S6 supports shared services and flexible arrangements to enable the diversification of services).
- 6.231 The viability tests set out below will be used to assess whether a commercial service can be made viable, and will require evidence of realistic marketing at a reasonable price. To provide impartial evidence regarding viability and marketing of the property an independent valuation is likely to be required by the District Valuation Office to inform the decision-making process.

- 6.232 Where it can be demonstrated that a local commercial service (A use class) is no longer viable and the case for a change of use is accepted on grounds of viability and in accordance with HC-D19, particularly for shops (A1 use), the preferred approach is that they remain in an alternative 'A' class use or otherwise a change of use to:
- a) D1 or D2 uses will be favourably considered - if this is not possible then;
 - b) other compatible employment uses (B1a - offices) may be permitted; or
 - c) where it can be demonstrated that A, D1, D2 or B1a uses or another community use are not possible, a change of use to residential dwellings to meet local needs in accordance with policies HC-D1 Conversions to Dwellings in Settlements and HC-D7 Conversions in the Open Countryside may be permitted.
- 6.233 In order to ensure that the above priorities are achieved, where only a part of a building is occupied by a commercial service and it is accepted by the National Park Authority as being unviable, a change of use to residential, as an extension of the existing dwelling will only be allowed if it can be clearly demonstrated that it is not possible for the commercial part of the building to operate independently of the main house; for example where the only means of access to the house is through the part of the building occupied by the commercial service.
- 6.234 Applicants considering the change of use of a site or building from a local commercial service under policy HC-D19 are encouraged to contact the National Park Authority at an early stage to discuss any proposals. The proposal will need to demonstrate that all possible options to improve the viability and sustainability of the service/business have been explored and that the marketing of the land or buildings has resulted in no reasonable offers of purchase before considering applying for change of use.
- 6.235 The National Park Authority will assess any proposals using the viability tests set out in the checklist below which are informed by the Campaign for Real Ale (CAMRA) Public House Viability Test³⁴⁰ and may be used to assess whether or not a commercial community service or facility can be made viable under policy HC-D19:
- a) Business viability: include evidence of how the business is managed, whether the service has been run successfully in the past, and whether there have been any attempts to improve viability including by diversifying the business. Are there other circumstances affecting viability such as business rates/taxes/rents, and have reasonable attempts to obtain funding or grants been made?
 - b) Location: whether it lies within a named settlement or in the open countryside.
 - c) Trade Potential: what is the catchment area, community use and impact of tourism?
 - d) Accessibility: the availability and frequency of public or community transport services in the area, and whether there is access to appropriate car parking nearby.
 - e) Competition: whether there are any other facilities offering a similar range of goods within a convenient distance, and the potential to cater for different groups.

³⁴⁰ CAMRA (2014) Public House Viability Test – Version 3 (31/3/14) [Online]
<http://www.camra.org.uk/documents/10180/20788/PublicHouseViabilityTest-2014-03-31.pdf/fd7f1665-f279-45bf-b89a-6eb3c235b7d1>

- f) Flexibility: has the flexible/multiple use and scope of the site for extensions or extending service provision been investigated (including unused rooms/outbuildings or adjoining land), and is the building well maintained? Is there scope for multiple use to combine its function to other community service uses?
- g) The Sale: has the service/facility been marketed/investigated in terms of its potential for other uses permitted by the GPDO³⁴¹ and cannot be made viable? Is there evidence of realistic marketing of the service/facility at a competitive price for a period of 12 consecutive months that reflects recent trading? A longer marketing period may be required if the market is stagnant. This period may have the added benefit of allowing communities time to develop community led proposals and will also be relevant if the property has been registered as an asset of community value with North Devon or West Somerset district councils.

6.236 In relation to Clause g) above the marketing steps and evidence that the National Park Authority would require include the following:

- a) The applicant/owner has advertised the premises on site and in local newspapers, estate/property agents (including with specialist trade agents) and, where appropriate, the District Council's sites and premises register and otherwise as requested by the National Park Authority.
- b) If the applicant/owner is considered to be a willing seller and has failed to provide a willing buyer/occupier in the first three months of marketing they have re-advertised the premises in the aforementioned publications at three month intervals thereafter.
- c) The applicant/owner has provided advertisement details, including sales particulars with a guide price to reflect the realistic market value of the site/building(s).
- d) Written evidence of all enquiries received and the reasons why potential buyers/occupiers found the site/buildings unsuitable.

³⁴¹ HM Government (2015) Town and Country Planning (General Permitted Development) (England) Order 2015. *The Stationery Office, London.*

HC-D19 SAFEGUARDING LOCAL SERVICES AND COMMUNITY FACILITIES

- 1. Proposals to change the use of a local commercial service or non-commercial community facility will not be permitted unless it can be clearly demonstrated that:**
 - a) there is no longer a need for the specific service or facility by the community, including over the longer term; and**
 - b) a need for other permitted uses or other services and facilities has been explored and is not required; or**
 - c) a replacement service or facility accessible to the local community of at least equivalent standard is provided; or**
 - d) in the case of local commercial services, they cannot be continued and made viable over the longer term.**
- 2. In the case of publicly funded/non-commercial services, including schools and libraries, tests 1 a), b) or c) will apply. Where the tests for a change of use set out in clauses 1 a), b) or c) are met, favourable consideration will be given to changes of use which benefit the community and the local economy consistent with policies in this Plan.**
- 3. In respect of 1 c), planning conditions or obligations will be used to ensure that the replacement provision is secured at an appropriate time in relation to the redevelopment of the site/building.**
- 4. In Local Service Centres changes of use from an existing local commercial service in the A use class to another commercial service in the A use class will be permitted providing they will have an acceptable impact on neighbouring uses.**
- 5. In respect of 1 d) proposals for the change of use of local commercial services and facilities (other than proposals relating to clause 4), will need to provide detailed evidence to demonstrate that:**
 - a) all available opportunities of grant funding and financial support to help retain the service or facility on the premises have been fully explored;**
 - b) diversification is not suitable or viable;**
 - c) opportunities for community/voluntary not-for-profit service provision have been investigated; and**
 - d) realistic marketing of the site or premises at a reasonable value for the current permitted use class for a minimum period of 12 consecutive months has occurred.**
- 6. Where the case for a change of use is accepted:**
 - a) favourable consideration will be given to 'A' 'D1' or 'D2' uses before**
 - b) other compatible employment uses (B1a) may be considered, or otherwise**
 - c) it can be demonstrated that the change of use to A, D1, D2 or B1a uses or another community use are not possible, a change of use to housing in accordance with policies HC-D1 or HC-D7 may be permitted.**

IMPORTANT VISUAL AMENITY SPACE

- 6.237 The Exmoor National Park Landscape Character Assessment identifies landscape character types and areas across the National Park (see policy CE-S1 Landscape Character). At a more local scale, there are smaller areas of land that have a landscape value to communities and the settlements they live in³⁴². The Local Plan inset maps identifies land of visual amenity value within and adjoining settlements, which recognises the significance these green areas have to the setting of buildings and other features, and their importance to the overall character of a settlement³⁴³. These are different to areas in settlements which are considered to be recreational, amenity and public green space that are open to everyone to use are defined as important open space for recreation and which are considered in policies HC-S6 and HC-D19.
- 6.238 Land of visual amenity value may form a focal point for a settlement, or may be significant in allowing views into and out of settlements in the wider landscape. Other areas are important in terms of historic landscape characteristics or for cultural reasons. These green areas are not always publicly accessible, but may be on occasions, such as when a local event is held.
- 6.239 Important visual amenity spaces were identified by local communities as part of the 1997 Local Plan Review and the Local Plan 2001 – 2011, and continue in this Local Plan. At each stage, public consultation has identified further areas for consideration which have then been assessed using the criteria outlined below, and included where it was demonstrated that such areas positively contributed to settlement character. The Landscape Assessment of Important Visual Amenity Space³⁴⁴ outlines and reviews the specific green areas identified in individual settlements to provide evidence for this designation.
- 6.240 These areas are primarily identified for their significance within and adjoining Exmoor's settlements but they also contribute to a green infrastructure network (CE-S3 Biodiversity and Green Infrastructure) that can provide ecosystem services, such as linkages between habitats and sites, positive benefits for the health and wellbeing of local communities and visitors, and enhance the overall environmental quality of settlements.
- 6.241 The selection of those local landscapes or green areas are based on those identified by communities through consultation and considered to be important to settlement character has been undertaken by a professional landscape architect using a set of identifiable criteria. The criteria used for the assessment are summarised below:
- a) Sense of Arrival/Place: a core area usually in association with community facilities.
 - b) Potential Arrival Spaces at the fringes of settlements which could act as future core spaces and which should be protected from development.
 - c) Screening/Setting: areas containing trees and shrubs which provide a contrast in texture to a building mass.
 - d) Breaks in Settlements: areas that break up settlements into smaller neighbourhood areas and reduces the impact of buildings in the landscape.
 - e) Cohesion with Countryside: areas that physically or visually connect with the surrounding countryside such as riverside corridors, woodland or farmland.
 - f) Countryside Experience: remnants of countryside within settlements which help to reduce the urban and increasingly suburban character of rural settlements.

³⁴² Natural England & Scottish Natural Heritage (2002) Landscape Character Assessment Guidance

³⁴³ There are areas of Important Visual Amenity Space located at Allerford and Luccombe –these settlements do not have inset maps as they are not within the settlement hierarchy (see Section 14: Annex 3 for relevant maps)

³⁴⁴ ENPA (2012) Landscape Assessment of Important Visual Amenity Space 2012 update. *Exmoor House, Dulverton*

- g) Visual Experience: important in providing an alternative visual experience to enclosed spaces as many of Exmoor's settlements are enclosed, tucked into valley bottoms, sunless and with no long views.
- h) Areas of Historic and Cultural Significance which have historically been used for activities such as markets, fairs or meeting places including notable historic events, or areas which add to the historic context of buildings
- i) Use: current use of space will be considered and sites used informally by the public will have greater value e.g. for informal dog walking³⁴⁵.

6.242 Development proposals should not erode the visual amenity value and unique sense of place these green areas provide for individual settlements on Exmoor. As Conservation Area status does not prevent the development of such land in principle, this local landscape designation will also apply within Conservation Areas.

HC-D20 IMPORTANT VISUAL AMENITY SPACE

Development proposals will not be permitted where they cause harm or detriment to the visual amenity value of those areas of important visual amenity space identified on the Settlement Inset Maps and their relationship to settlement character, the surrounding landscape or the cultural/historic traditions of individual settlements.

RESIDENTIAL INSTITUTIONS

6.243 Residential institutions are defined under the Use Classes Order³⁴⁶ as class C2 as 'residential accommodation and care to people in need of care', such as residential schools, hospitals and nursing homes. Policy HC-S7 supports in principle, the reuse of existing buildings across the National Park as residential institutions. This may include residential care homes and nursing homes that could help address a local need for specialist accommodation given the increase in the proportion of Exmoor's population over retirement age, or residential educational facilities to promote the understanding and enjoyment of the National Park and its special qualities.

6.244 National policy³⁴⁷ states that local planning authorities should work with other authorities and providers to assess the quality and capacity of infrastructure for social care and take account of and support local strategies to improve health, social and cultural wellbeing for all. Government policies also encourage care in the community to help people remain independent within their own homes and communities³⁴⁸. However, it is important to ensure that there is a policy framework to provide for a range of specialist residential accommodation should the need for it be necessary.

6.245 Proposals for residential education facilities that promote the enjoyment and understanding of Exmoor and its special qualities will also be favourably considered where they can be demonstrated to be in accordance with policies in this plan.

³⁴⁵ ENPA (2012) Landscape Assessment of Important Visual Amenity Space 2012 update. *Exmoor House, Dulverton*

³⁴⁶ HM Government (1987) The Town and Country Planning (Use Classes) Order 1987 (as amended), *The Stationery Office, London*

³⁴⁷ DCLG (2012) National Planning Policy Framework – Department of Communities and Local Government

³⁴⁸ Department of Health (2013) Care in local communities – A new vision and model for district nursing [Online]

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/213363/vision-district-nursing-04012013.pdf

- 6.246 Consistent with the approach for the provision of hotels and guesthouses (RT-S1), new residential institutions should be provided through the reuse of existing buildings as they are a means of achieving new residential institutions without the need to build new premises, which encourages sustainable resource consumption. This approach is considered to be more appropriate in a National Park where the priority is to minimise building on greenfield land, given the potential scale of such development. Suitable buildings include former hotels and Policy RT-S3 clause 1 provides some flexibility to change their use to other employment premises including residential institutions. The conversion and structural alteration of buildings should accord with the principles set out in policy CE-S5 Principles for the Conversion or Structural Alteration of Existing Buildings. Care should be taken with the conversion and structural alteration of buildings, particularly physical changes such as car parking, fire escapes, and extensions that can have a detrimental impact on the character of the building and its setting. For buildings identified as a heritage asset or within a Conservation Area, policies CE-S4 Cultural Heritage and Historic Environment, and CE-D3 Conserving Heritage Assets will also apply. Proposals for extensions to new or existing residential institutions should accord with policy CE-D4 Extensions.
- 6.247 A change of use to a residential institutions, such as care homes, should be located in Local Service Centres to enable access to essential facilities including health services, shops, bus routes, and other community services or Villages with a good level of service provision. Such considerations will be a key factor in marginal decisions unless a case can be made that a location in the open countryside is required. In such circumstances the National Park Authority will require the applicant to provide a Transport Assessment or Statement (AC-D1 Transport and Accessibility Requirements for Development) to demonstrate that transport impacts will be minimised to an acceptable level. Proposals for residential institutions should avoid areas at risk of flooding and consider whether any adaptations to climate change impacts will be required; Porlock Weir would not be considered to be a suitable location for a highly vulnerable category such as a residential institution given the risk of coastal change and flooding. Appropriate climate change mitigation measures will also be encouraged (CC-S1 Climate Change Mitigation and Adaptation).
- 6.248 Adequate parking should be provided in accordance with policy AC-D2 (Parking Provision and Standards). Gardens or grounds within the curtilage of the building should be of an adequate size to support the intended use of the property.
- 6.249 The use of a building as a residential institution should not compromise local amenity, including by way of overlooking, loss of privacy, noise and disturbance, and the intensification of use should not adversely affect the character of the area.
- 6.250 Any proposals that relate to secure residential institutions (use class C2a) will also be considered under this policy.

HC-S7 RESIDENTIAL INSTITUTIONS

- 1. Proposals for new residential institutions will be supported where they meet the following principles:**
 - a) they re-use existing buildings without the need for significant extension and accord with policies relating to the conversion or structural alteration of buildings (CE-S5);**
 - b) they seek to mitigate climate change effects and adapt to its impacts, including avoiding areas at risk of flooding;**
 - c) the design and layout of access and parking requirements are compatible with landscape character and built heritage;**
 - d) traffic generation can be accommodated by the local road network without adversely affecting road safety and capacity - if it considered that the proposal would have significant transport implications a transport assessment or statement will be required; and**
 - e) the use does not compromise local amenity.**
- 2. Regard should be had to location and the level of services and facilities that may be required to support the proposed use.**
- 3. Proposals which encourage the understanding and enjoyment of the National Park and its special qualities will be encouraged.**
- 4. Small scale extensions to existing residential institutions will be permitted where they accord with policy CE-D4.**

7. ACHIEVING A SUSTAINABLE ECONOMY

Objective 14: *To achieve a strong, diverse, resilient and self-sufficient economy and encourage economic and employment opportunities which do not conflict with National Park purposes.*

Objective 15: *To achieve profitable farming, forestry and land management in ways that conserve and enhance the special qualities of the National Park whilst producing food and other produce, and conserving distinctive local breeds.*

CONTEXT

- 7.1 The National Parks Circular recognises that conserving and enhancing the natural beauty, wildlife and cultural heritage and supporting vibrant, healthy and productive living and working communities need not be in conflict³⁴⁹. The benefits of the environmental economy can be delivered in a way that benefits the National Park and reflects the statutory purposes ensuring an appropriate scale of development and investment most likely to maximise the benefits of a high quality environment, and bring higher value local employment opportunities.
- 7.2 National guidance states that the planning system, in pursuing sustainable development, should ensure that sufficient suitable land is available in order to deliver the development needs of an area and to make it easier for jobs to be created in settlements whilst recognising the intrinsic character and beauty of the countryside, and supporting thriving rural communities within it. National policy recommends that Local Plans should be flexible to accommodate unforeseen needs and changes in economic circumstances. They should set criteria or identify strategic sites³⁵⁰.
- 7.3 The policies in this section seek to encourage development which will help strengthen and diversify the Exmoor economy and sustain the high quality environment of the National Park. Although responsibility for economic development in the area lies with Somerset and Devon County Councils and West Somerset and North Devon District Councils, the National Park Authority, in addition to its duty under the Environment Act, plays an important role in drawing up an agreed vision for the area, including through the Exmoor National Park Partnership Plan and working with partners, including its constituent local authorities and the Heart of the South West Local Enterprise Partnership, to facilitate actions to benefit the National Park and its communities.
- 7.4 Exmoor's economic activity illustrates that two thirds of working age people within the National Park are economically active. There are generally low levels of unemployment despite the low levels of economic activity as a result of the large retired population and the fact that much work is seasonal. Of those working age people that are economically inactive two thirds are retired³⁵¹. Compared to national and regional levels there is a high proportion of self-employment and working from/at home within the National Park, which is characteristic of or sparse rural areas where people are twice as likely to be home-based or self-employed, as those in less sparse areas³⁵². Entrepreneurial activity in such sparse rural locations is generally higher than in urban areas; similar to levels observed in inner London³⁵³.

³⁴⁹ DEFRA (2010) English National Parks and the Broads UK Government Vision and Circular (Paragraph 64)

³⁵⁰ DCLG (2012) National Planning Policy Framework (Paragraph 21). Department of Communities and Local Government

³⁵¹ Office for National Statistics (2013) - 2011 Census, Key Statistics for National Parks in England and Wales

³⁵² Office for National Statistics (2010) Rural and urban areas: comparing lives using rural/urban classifications – Regional Trends 43 2010/11

³⁵³ Commission for Rural Communities (2010) State of the Countryside 2010

- 7.5 Tourism is the largest employer in the National Park and visitor spend helps to support a range of local shops and services that also provide a significant level of employment³⁵⁴. The agriculture and forestry sector continues to have an important role in the area's economy and their traditional practices have helped shape the landscape of Exmoor. Public services also make up a significant proportion of the economy through public administration, health and social care and education services³⁵⁵.
- 7.6 The number of businesses which fall within the planning 'B' use class of offices and light industry is low compared to other areas and generally of micro scale, employing 5 people or fewer. The local economy is therefore dominated by non-B class uses and a diverse range of small scale activities. Other services and some manufacturing provide the remaining local employment. The rate of new 'B' Class employment development has been relatively limited and evidence suggests that this trend is likely to continue.
- 7.7 Employment units within the National Park include small purpose built units at Barnsclose in Dulverton, at Cutcombe Market in Wheddon Cross, and workshops at Lynmouth. There are also a number of existing purpose built employment sites and buildings close to, but outside, the National Park boundary including at Bratton Fleming, Combe Martin, Exebridge, and between Brushford and Dulverton. The National Park Authority works with neighbouring authorities so that there is a consistent approach to planning for local employment across administrative boundaries to ensure there are appropriate opportunities within and close to the National Park to help meet the needs of local communities who live or work both within and outside the National Park.
- 7.8 A thriving and sustainable Exmoor economy based on the area's environmental capital underpins the conservation and enjoyment of the National Park and its prosperity. Exmoor National Park is a major visitor destination and an important area for recreation. The high quality landscape, peace and quiet, biodiversity and cultural heritage that Exmoor provides are the major attractors for visitors, along with the opportunity to enjoy outdoor activities. Sustainable rural tourism and leisure development is encouraged, including in appropriate locations where identified needs are not met by existing facilities in local service centres, and where they respect the character of the countryside. Policies enabling the development of visitor accommodation, camping site and recreation facilities are included in Section 8 of the Plan 'Achieving Enjoyment for All'. Policies within Section 6 'Achieving a Thriving Community' address housing, including for key workers, and business development relating to shops and other local commercial and community services and facilities.
- 7.9 The sectors offering the greatest opportunities for employment³⁵⁶ are likely to be in hotel and catering (tourism), reflecting the increasing importance and role of tourism within the Exmoor economy, and in health and social care, resulting from the continued growth in the proportion of the elderly population³⁵⁷. Evidence indicates that there are increasing opportunities arising from climate change mitigation (e.g. supply of wood fuel but also development, supply and fitting of environmental technology) and for knowledge-based and creative businesses.

³⁵⁴ Office for National Statistics (2013) - 2011 Census, Key Statistics for National Parks in England and Wales 15.6% of people in employment are in accommodation and food services occupations, plus 14.2% in retail trade.

³⁵⁵ DEFRA (2010) ONS -Exmoor National Park: Economic profile Table 1.1 Employment by Industry Source Labour Force Survey 2005, 2008, *The Stationery Office, London*;

Nathaniel Lichfield and Partners (2009) Exmoor National Park Employment Land Review para 2.43"public administration health and social care and education sectors account for 20% of local employment" ;

Office for National Statistics (2011) Census 2011. *The Stationery Office, London* 17.3% within public administration health and social care and education sectors.

³⁵⁶ Nathaniel Lichfield and Partners (2009) Exmoor National Park Employment Land Review. (95%/ of all job growth is likely to be in hotel and catering and health and social care).

³⁵⁷ Office for National Statistics (2013) - 2011 Census, Key Statistics for National Parks in England and Wales. (9.7% of residents in employment work in human health and social work activities).

- 7.10 It is important that employment needs in the National Park are met in a way that is consistent with National Park objectives, its rural nature and the small size of Exmoor's settlements. The creation of new large scale employment opportunities such as major industry (GP2 Major Development) would therefore be inappropriate and in direct conflict with statutory National Park purposes. The impacts resulting from, for example, the large buildings required, traffic generation, parking and loading operations associated with such uses are likely to make a significant impact on the landscape and other purposes of the National Park as well as on the amenity of local communities. This type/scale of business development and certain employment opportunities will, due to their type and level of activity, be more appropriate in larger towns outside the National Park such as in Barnstaple, South Molton, Tiverton, and Minehead; where consistent with planning policies in those districts.
- 7.11 The policies within this section of the Plan set out a framework to guide the use and development of land to help achieve the Exmoor National Park Partnership Plan priorities of supporting strong elements of the existing economy, such as tourism and farming, whilst encouraging new business opportunities where they can benefit and contribute to the special environment of the National Park; including employment opportunities for young people³⁵⁸. Policies therefore encourage a diverse and strong Exmoor economy to create employment and seek to sustain and encourage sustainable development that is consistent with National Park purposes and which, wherever possible, benefits from and contributes to the care and appreciation of Exmoor's nationally important and distinctive environment.
- 7.12 Both strategic and development management policies will guide business and agricultural and forestry development. Criteria based policies will ensure there is flexibility to be responsive to changing circumstances.
- 7.13 A range of business opportunities are encouraged through the reuse of previously developed (or brownfield) land and by providing scope for new sites and buildings within the named settlements identified in Policy GP3. Consolidating employment and services in these settlements will help to meet the needs of the National Park's communities by diversifying the economy, creating jobs and helping retain and enhance key services and facilities. There are also opportunities for economic development outside settlements on farmsteads and in hamlets, and for home working.
- 7.14 Recent economic development has shown that the vitality of the local economy has been sustained without the need for high levels of new build development as much has been delivered through the re-use of existing buildings. The National Park Authority encourages this approach in principle, as the re-use of existing buildings minimises greenfield development and is therefore a more sustainable approach in a National Park, given the limited supply of suitable greenfield land within and adjoining the settlements (GP4 The Efficient Use of Land and Buildings). The change of use to employment can, if carried out sympathetically, also help secure the retention of a building's character whilst also supporting the local economy in accordance with Policy CE-S5 Principles for the Conversion or Structural Alteration of Existing Buildings.
- 7.15 The policies therefore provide for the flexible release of appropriate sites and buildings for business development in response to emerging needs rather than to allocate land for employment use given the rural character of the local area, the nature of the economy, the scale of past trends and forecasts of future employment growth. It is also not possible to ascertain which sites or buildings are most likely to be developed or reused and so the allocation of sites that are likely to come forward for employment purposes cannot be achieved with any acceptable degree of accuracy³⁵⁹.

³⁵⁸ ENPA (2012) Exmoor National Park Partnership Plan 2012-2017, *Exmoor National Park Authority, Dulverton*

³⁵⁹ Nathaniel Lichfield and Partners (2009) Exmoor National Park Employment Land Review

A SUSTAINABLE EXMOOR ECONOMY

- 7.16 Policy SE-S1, 'A Sustainable Exmoor Economy', applies to all proposals for business development in the National Park. Appropriate business and employment development are encouraged where they avoid negative impacts on the area so the economic benefits of Exmoor's high quality environment can continue consistent with statutory National Park purposes. This approach to encouraging a sustainable economy for the area is consistent with the area's designation as a National Park. The Plan, therefore, seeks to encourage a range of appropriate new business and employment development to address the needs of the National Park's local communities.
- 7.17 Some businesses may grow and intensify their activity to a degree where proposals for extended or new premises are likely to have a detrimental and significant impact on the appearance and character of landscape and other special qualities of the National Park (including sensitive habitats and wildlife), and may no longer therefore be compatible with their location. The National Park Authority seeks to enable successful businesses to expand appropriately, however there may be occasions where the scale of the business and the intensity of its activities are such, in terms of numbers of employees and traffic, for example that it should consider moving to a more appropriate and sustainable location.
- 7.18 Home working and self-employment make an important contribution to Exmoor's economy. The National Park Authority recognises that the provision of and improvements in communications infrastructure, including broadband, are vitally important to many existing businesses, as well as a driver for enabling new businesses to prosper and provide high value home working opportunities. Policies for the appropriate improvement of communications technology, are set out in Section 9 of this Plan 'Achieving Access for All'. Policies in this section of the Plan seek to encourage home based business where it can be accommodated as part of a residential use and it is compatible with the area and the amenity of neighbouring occupiers. Provision for home based employment of an appropriate scale should accord with SE-D1 Home Based Businesses.
- 7.19 Policy SE-S1 also seeks to ensure the continued protection of existing employment land and buildings to be safeguarded as an important resource. This should ensure that a supply of land is available for prospective businesses and minimises the need for, and avoids the cost and complication of, developing new sites of which there is a limited supply. There is scope for appropriate changes of use in certain circumstances including where employment sites or buildings cannot be made viable in the longer term. Proposals for the change of use of employment land and buildings must, in addition to the requirements of SE-S1, accord with SE-D2 Safeguarding Existing Employment Land and Buildings.

SE-S1 A SUSTAINABLE EXMOOR ECONOMY

- 1. In order to strengthen, enhance and diversify the Exmoor economy, business and employment development will be encouraged.**
- 2. Proposals for business development, including extensions and/or the growth and intensification of existing businesses, should demonstrate they will not have an unacceptable adverse impact including in terms of their operations, activity, and scale, on local amenity, landscape character, cultural heritage, sensitive habitats and wildlife.**
- 3. Opportunities for home working and home based employment will be encouraged in accordance with policy SE-D1 home based businesses.**
- 4. Existing employment land and buildings will be safeguarded in accordance with policy SE-D2.**

BUSINESS DEVELOPMENT IN SETTLEMENTS

- 7.20 In accordance with GP3 Spatial Strategy, new employment sites and buildings will be focused in the named settlements, and be of a type, scale and design appropriate to the settlement and National Park context. Policy SE-S2 seeks to encourage a range of new 'B' and other sui generis uses, considered by the National Park Authority to be business development. This includes the creation of rural enterprise hubs that can be used by home workers to overcome issues, such as isolation and lack of networking opportunities, and help support the viability and growth of their business activity. Focusing new employment sites and buildings in more accessible locations will help to meet the needs of the National Park's communities by diversifying the economy, creating jobs and helping retain and enhance key services and facilities.
- 7.21 The policy encourages the reuse of buildings. It first seeks the reuse of traditional buildings but, where they do not exist, non-traditional buildings should be re-used or other previously developed sites including the replacement of non-traditional buildings where opportunities are taken to achieve enhancement. Proposals should accord with Policy CE-S4 Cultural Heritage and the Historic Environment and Policy CE-S5 Principles for the Conversion or Structural Alteration of Existing Buildings.
- 7.22 There is scope for new sites and buildings for business in settlements. A special quality of the National Park is the lack of intrusive features in the landscape and suitable greenfield sites are few and may, over the longer term be required for a range of uses including local affordable housing. It is therefore important to ensure that the best use is made of previously developed (brownfield) sites/buildings and those with planning permission, which should be considered before greenfield land in accordance with GP4 Making Efficient Use of Land and Buildings. All proposals should respond to opportunities for enhancement and details should be included as part of a planning application. The National Park Authority encourages early discussions and will provide guidance on proposals including enhancement measures.
- 7.23 Where new B1 uses with a floorspace of 150 square metres or less are granted planning consent, permitted development rights may be withdrawn in respect of temporary changes of use to A1, A2, A3, A4, A5, D1 and D2 of the use Classes Order³⁶⁰. This is because this measure was introduced nationally to contribute to the viability and vitality of town centres. It could however result in the loss of B1 employment buildings in the National Park which are in short supply and which the Plan seeks to safeguard. The national change does not, therefore, fully reflect the role of employment buildings within the sparse rural area of Exmoor National Park, where their retention is essential to local socio-economic well-being.
- 7.24 Within Porlock Weir the re-use of existing buildings or extension of existing business premises is the preferred approach. Where new build employment buildings/sites are proposed these should be of a scale that is compatible with the character and form of the settlement and demonstrate they are directly related to existing industries in Porlock Weir. Proposals should also accord with CC-S2 Coastal Development and CC-S3 Porlock Weir Coastal Change Management Area.

³⁶⁰ HM Government (2015) Town and Country Planning (General Permitted Development) (England) Order 2015. *The Stationery Office, London*. Part 4 of Schedule 2 to the General Permitted Development Order grants planning permission in respect of certain temporary buildings and uses.

SE-S2 BUSINESS DEVELOPMENT IN SETTLEMENTS

- 1. In the named settlements proposals for business development or extensions to existing businesses should accord with policy SE-S1 and be located within the settlement or where no suitable buildings/sites are available, well-related to existing buildings.**
- 2. Proposals will be permitted where:**
 - a) they reuse existing traditional buildings wherever possible, in a way that maintains and enhances their character, or where no suitable buildings are available;**
 - b) they reuse non-traditional buildings, or previously developed sites and proposals achieve enhancement, or where this cannot be achieved;**
 - c) a replacement of a non-traditional building, or a new site/building may be permitted.**
- 3. In addition to clause 1, any proposals for new build development in Porlock Weir, other than extensions to existing premises, should be:**
 - a) small-scale to reflect the form and character of the of the settlement; and**
 - b) compatible with industries associated with the settlement.**

BUSINESS DEVELOPMENT IN THE OPEN COUNTRYSIDE AND FARM DIVERSIFICATION

- 7.25 Policy SE-S3 provides opportunities, and sets out the policy framework, for new business development in the open countryside, through the extension of existing business sites or buildings—and the reuse of existing buildings in farmsteads or hamlets. Ensuring that the best use is made of existing buildings, including those with the benefit of planning permission, will help to ensure that the National Park is conserved and enhanced (GP4 The Efficient Use of Land and Buildings). In recognition of the importance of farming and forestry to the area, policy provides for agricultural and forestry development.
- 7.26 Policies in the Local Plan ensure that there is flexibility to help ensure that traditional farming on Exmoor can continue to thrive over the longer term. Clause 3 is therefore aimed at farms and land based businesses, including estates, and sets out the provisions specific to proposals for farm diversification in recognition of the benefits that it can bring to sustaining a farm or other land based business responsible for land management; enabling alternative employment opportunities, including holiday-lets, to help support the primary farm business. Whilst succession farm dwellings (HC-D10 Succession Farming – Second Dwellings on Established Farms) enable farmers to transfer the business to subsequent generations.
- 7.27 The Exmoor National Park Partnership Plan identifies significant potential to increase the value added locally to sustainable materials produced in the National Park and greater use of local sustainable materials, helping to create employment and new business opportunities where they do not adversely affect the National Park. This also has the potential to help sustain traditional building skills in the area which in turn contributes to the conservation and enhancement of the National Park³⁶¹.

³⁶¹ ENPA (2012) Exmoor National Park Partnership Plan 2012-2017

- 7.28 To date, farm diversification within the National Park has particularly centred on tourism and game shooting activity as ways to generate additional income to support farm businesses³⁶². Other avenues have included the processing of farm produce. Activities could include the development of new agricultural opportunities or adding value to primary produce. The level of income resulting from these additional business activities appears to vary considerably: in some cases, the non-farming activities are very much ancillary to the main farm business, whilst for others they have represented the main source of income. The General Permitted Development Order (GPDO)³⁶³ permits the change of use of agricultural buildings to a flexible use class for A1, A2, A3, B1, B8, C1 or D2 up to 150sqm where the National Park Authority is notified of the change, and buildings up to 500sqm will require prior approval in relation to transport/highways, noise, contamination risks and flood risk. Applicants are advised to check with National Park Authority officers whether planning permission is required for the change of use of agricultural buildings.
- 7.29 In the open countryside, reuse of traditional buildings (CE-S5 Principles for the Conversion or Structural Alteration of Existing Buildings) is strongly favoured where the existing building is well related to existing (farm) buildings in a farmstead or within a hamlet. Proposals for the re-use of existing or construction of new isolated buildings for farm diversification will not be permitted unless it accords with Policy RT-D6 (Camping Barns).
- 7.30 For land-based businesses, clause 3 of the policy also gives scope for the re-use of a non-traditional (modern) farm building. This will be acceptable if it can be clearly demonstrated that the agricultural use has ceased and the building is structurally suitable for the proposed use in accordance with CE-S5 Principles for the Conversion or Structural Alteration of Existing Buildings. The re-use/change of use of purpose-built or pre-fabricated agricultural buildings to business use, e.g. prefabricated barns, or agricultural buildings that are subject to a planning condition requiring their removal on the cessation of the agricultural use, will not be considered for conversion.
- 7.31 Where permission is granted for proposals for the change of use of non-traditional agricultural buildings to other business uses, the National Park Authority will attach a condition removing permitted development rights granted by the Town and Country Planning (General Permitted Development) Order 2015 in respect of the construction of new farm buildings.
- 7.32 The location of new business activity in the open countryside could lead to increased travel movements and consequently emissions. Proposals should therefore accord with Policy AC-D1 Transport and Accessibility Requirements for Development, to ensure that levels of traffic and emissions are acceptable.

³⁶² Nathaniel Lichfield and Partners (2009) Exmoor National Park Employment Land Review

³⁶³ HM Government (2015) Town and Country Planning (General Permitted Development) (England) Order 2015. *The Stationery Office, London.*

SE-S3 BUSINESS DEVELOPMENT IN THE OPEN COUNTRYSIDE

- 1. Business development will be permitted for the change of use and conversion of an existing traditional building that is well-related to an existing group of buildings on a farmstead or in a hamlet where there is an existing dwelling, in accordance with policies SE-S1 and CE-S5.**
- 2. Proposals for extensions to existing business sites or buildings that are well-related to an existing group of buildings on a farmstead or in a hamlet where there is an existing dwelling will be permitted in accordance with SE-S1 and where the scale and appearance of the development are compatible with local landscape character.**
- 3. Additionally, proposals for the diversification of existing agricultural, or other primary businesses responsible for land management, through the re-use/change of use of an existing non-traditional building for business development may be permitted where the following will be achieved:**
 - a) they are well-related to an existing group of buildings on the farmstead and accord with policy CE-S5;**
 - b) it can be demonstrated that the agricultural use of the existing building(s) to be re-used is redundant;**
 - c) the proposed business development supports an existing agricultural or other primary business responsible for land management and does not conflict with the existing farming or land management activity; and**
 - d) where proposals relate to the change of use of an existing building from an agricultural use to a business use (use classes B1, B2, B8 or sui generis), a condition may be attached to the permission to enable the building to be used for the purposes of agriculture or the permitted business use.**
- 4. The erection of new business premises in the open countryside will not be permitted.**
- 5. Business use in buildings which stand alone or which do not relate well to existing buildings and are not part of a farm group or hamlet will not be permitted.**

HOME BASED BUSINESSES

- 7.33 The National Park Authority encourages opportunities for home working including through allowing home based business of an appropriate scale and activity. Not all home-based businesses require planning permission if they are ancillary to domestic use. However, for those that require planning permission, the effect on the residential property, as well as the amenity of neighbours and other potential impacts will be taken into account.
- 7.34 This policy provides for the use of a residential property, a small extension to a dwelling, the conversion of an existing outbuilding within the domestic curtilage or, where there are no existing buildings, a new small scale building for a home based business within the domestic curtilage where their scale and activity is such that they will not adversely affect the National Park or the amenity of the occupiers of neighbouring properties. Occasionally, the use of existing buildings close to the dwelling house but not strictly within the curtilage may be acceptable where their siting is closer to the main dwelling house than any existing buildings within it and their reuse would result in a more acceptable scheme in terms of the impact on the area. Proposals for residential extensions to accommodate a home based business will need to accord with Policy HC-

D15 Residential Extensions. An important consideration will be to ensure that the home based business does not change the residential character of the property.

- 7.35 Impacts on the amenity of the area or on occupiers of neighbouring properties include consideration of the scale, size and type of the business; potential additional traffic generation, access, noise or disturbance caused by visitors or business operations. Any proposals for home working should include energy efficiency measures to reduce emissions and should therefore be in accordance with Policy CE-S6 Design and Sustainable Construction Principles.
- 7.36 Where it considers it necessary, the National Park Authority will seek to attach conditions to any granting of planning permission. This will include to control the impact on local amenity, the scale of the business use and its hours of working, for example. Where necessary, the site may be tied to the main dwelling or the occupier and if, the use were to cease, for example on selling, would revert back to purposes incidental to the main dwelling. Permitted development rights may be withdrawn to control storage of materials and equipment and the erection of further buildings and/or structures. In certain cases, permission may be granted for a temporary period to allow the impact of the business to be assessed.
- 7.37 Proposals for 'live-work' units should be in accordance with housing policies in Section 6.

SE-D1 HOME BASED BUSINESSES

- 1. The use of part of a residential property, a small scale extension, the use of ancillary buildings where they are well related to existing buildings or, where no suitable buildings exist new outbuildings within the domestic curtilage, for a small scale home based business will be permitted where:**
 - a) there is no unacceptable adverse impact on the landscape or the amenity of the area or on the occupiers of neighbouring properties; and**
 - b) where an extension is proposed the development accords with Policy HC-D15 Residential Extensions.**
- 2. Where necessary, conditions will be attached to any granting of planning permission including to:**
 - a) control the use to avoid or minimise any potential adverse impacts;**
 - b) remove permitted development rights to protect the character and appearance of the building;**
 - c) ensure any new development may only be occupied in association with the dwelling and cannot be let or disposed of separately from that dwelling; and**
 - d) allow, where appropriate, the business use to cease and revert to an ancillary domestic use without the need for further planning permission.**
- 3. Proposals for live-work units should be in accordance with the housing policies in this Plan.**

SAFEGUARDING EXISTING EMPLOYMENT LAND AND BUILDINGS

- 7.38 Given the finite supply of employment land in the National Park, and the limited supply of greenfield land for development, the presumption is that existing employment sites and premises will be safeguarded for economic uses. They make an important contribution towards the local economy, sustainability and self-containment of Exmoor's communities.
- 7.39 Where the loss of employment land is proposed due to the site or building being considered unviable, the owner/applicant will be required to provide detailed evidence to justify their proposals and to demonstrate that they have made reasonable attempts at marketing the sites or buildings for an employment use for a minimum of twelve months. In some circumstances, a longer period may be required, for example, when the

property market is less buoyant. As evidence of marketing, the National Park Authority will require:

- a) advertisement on site, in local newspapers, estate/property agents and, where appropriate, the District Council's sites and premises registers or otherwise as requested by the National Park Authority;
- b) the owner/applicant to advertise the premises for a minimum period of twelve months (as above) and to re-advertise at three month intervals if they fail to provide a willing buyer/occupier in the first three months of marketing;
- c) the owner or applicant to supply the National Park Authority with the advertisement details including sales particulars with a guide price to reflect the market value of the site/building(s); and
- d) the owner/applicant to have provided the National Park Authority with written evidence of all enquiries received and the reasons why potential buyers/occupiers found the site/buildings to be unsuitable.

7.40 If the Authority is satisfied that the site and/or buildings are no longer viable in employment use, the owner/applicant will be required to maintain an enhanced level of employment generating uses on the remaining part of the site/in the building (i.e. at the same level as on the whole site but on/in a smaller area) or alternative provision will need to be provided on another suitable site(s) / building(s) under the control of the applicant; a planning condition or obligation will be used to ensure that the alternative provision is secured at an appropriate time in relation to the redevelopment of the site or building. If it can be demonstrated that these are not possible, within or adjoining the named settlements in GP3 Spatial Strategy, redevelopment of the site for community uses will be favoured. Proposals for the change of use or redevelopment of the site to residential uses will only be considered if other uses are demonstrated not to be viable and should be in accordance with the housing policies set out in Section 6 Achieving a Thriving Community.

SE-D2 SAFEGUARDING EXISTING EMPLOYMENT LAND AND BUILDINGS

- 1. Development proposals that would involve the loss of employment land and/or buildings will not be permitted unless it can be demonstrated that the site and/or buildings cannot be continued or made viable in the longer term. Applicants will be required to provide detailed evidence to justify their proposals and demonstrate that:**
 - a) all available opportunities of grant funding and financial support to help retain the employment use(s) have been fully explored and none are viable; and**
 - b) reasonable marketing of the site and/or building(s) for employment uses for a minimum period of 12 consecutive months has occurred.**
- 2. If it is demonstrated that the site and/or buildings are no longer viable in employment use, the following will be required:**
 - a) in the first instance, employment-generating uses will be maintained on the remaining part of the site/in the building, or**
 - b) alternative provision will be provided on another suitable site(s)/building(s) under the control of the applicant and in the locality or where it can be demonstrated that this is not possible, elsewhere in the National Park.**
 - c) If it can be demonstrated that (a) or (b) are not possible, the reuse/redevelopment of the site for community uses will be favoured.**
 - d) If it is demonstrated that the alternative uses in clauses (a) to (c) are not viable, proposals for residential development will be considered in accordance with the relevant housing policies in the Plan.**
- 3. In respect of 2b) above, planning conditions or obligations will be used to ensure that the alternative provision is secured at an appropriate time in relation to the redevelopment of the site/building.**

AGRICULTURAL AND FORESTRY DEVELOPMENT

CONTEXT

- 7.41 Traditional farming and woodland management has helped create Exmoor's distinctive landscape. Sustainable agriculture and forestry are essential for maintaining the characteristic landscapes of the National Park, can play an important role in helping to manage and enhance Exmoor's wildlife and the environment and are major contributors to the local economy.
- 7.42 Farming, both on Exmoor and nationally, has faced a number of challenges which have particularly affected smaller farms in upland areas. The consequence on Exmoor has been a decline in traditional forms of farming with a decline in medium sized farms and an increase in the number of smaller (residential) holdings. As a result, a number of large farms managed by a relatively small number of operators are responsible for the management of a large proportion of Exmoor's agricultural land. Evidence indicates there is a relatively lower dependency upon agriculture as a source of income³⁶⁴. Employment levels have fallen, a trend that is expected to continue, and the average age of farmers on Exmoor is now more than 55³⁶⁵. These changes have implications for Exmoor's local economy.
- 7.43 Although employment figures for the forestry sector are included within the broader category of agriculture, locally it is an important sector in its own right contributing to environmental management and the conservation of the landscape and habitat diversity. Exmoor has a number of forestry plantations, which are among the highest yielding and extensive in the South West and softwood production will continue to be an important part of the economy on Exmoor. The woodland and forestry sector also makes a contribution to outdoor leisure and recreation activities. Timber from Exmoor's forestry is used for a range of purposes including wood fuel and manufacturing. As with farming, the opportunity exists to achieve a greater return from woodland from the development of processing activities. It will be important to ensure that the scale and type of any development required for processing is appropriate to the local and National Park context.
- 7.44 Changes in the farming and forestry sectors are likely as demand for food, timber (including woodfuel products), and other products grows. The Government has made a commitment to identify means of increasing food production in ways that also improve the environment³⁶⁶. Other changes include: a trend for farm houses to be sold off, holdings split up, and an increase in the number of part-time and 'hobby farms'.
- 7.45 The Partnership Plan recognises that truly sustainable farming and land management can continue to provide high quality food, timber and other products while maintaining a healthy environment that also provides a wide range of other benefits known as 'ecosystem services'. These include clean water, managed flood risk, and opportunities for recreation, enjoyment and inspiration. Careful management will be needed as a result of increasing demands for timber, particularly as biomass fuel for e.g. wood heating, to ensure that economic and employment opportunities are balanced with landscape, nature conservation and cultural heritage interests.
- 7.46 Many agricultural or other land management activities are not controlled by the planning system. However, planning policy has a role to play, for example, in how the farming community can contribute to other areas of the economy through diversification whilst conserving and enhancing the National Park for future generations to enjoy. Policy SE-

³⁶⁴ Lobley, M *et al* (2004) *The State of Farming on Exmoor 2004 - University of Exeter*

³⁶⁵ *Ibid.*

³⁶⁶ HM Government (2011) *The Natural Choice: securing the value of nature. The Stationery Office. London*

S3 earlier in this section of this plan seeks to encourage farm diversification which is appropriate in the context of a National Park.

- 7.47 In line with Government policy, the Authority recognises the importance of enabling farm businesses to become more competitive, comply with changing legislation and associated guidance, diversify into new agricultural opportunities and to adapt to changing markets.
- 7.48 The use of land for the purposes of agriculture or forestry (including afforestation), and the use of existing buildings on the land for agricultural or forestry purposes do not constitute "development" and so do not require planning permission. The carrying out of building, engineering, mining or other operations and the making of any material change in the use of buildings or land do however constitute "development". Certain agricultural and forestry developments have "permitted development rights" which means that a specific planning permission is not needed if a development falls within one of the categories set out in the Town and Country Planning General Permitted Development Order (GPDO) 2015³⁶⁷ and meets all the conditions laid down in it. Developments that are not covered by these permitted development rights require planning permission.
- 7.49 Under the GPDO, applications for a range of buildings/structures can be made through a system of notification, whereby the Authority is required to approve the details of a scheme relating to its siting, design and external appearance. In considering such applications, the Authority must be satisfied that the proposal is designed for the purposes of agriculture or forestry in terms of its scale and location and will not have an adverse impact on the character of the wider landscape. Changes in requirements relating to, for example, protection of water quality from run-off through provision of covered storage for slurry may lead to proposals for buildings or structures. The investigation of functional need including may be undertaken where necessary through independent expert advice or investigation of other aspects of the agricultural holding, for example, where a proposed building is of a substantial size, clarification may be sought over the intended use to ensure that the size is justified.
- 7.50 Applicants are encouraged to approach the Authority at an early stage for advice on: the siting and design of buildings; whether a proposal requires planning permission; and the need for, and scope of, an Environmental Impact Assessment. New farm buildings tend to have a large, wide span with shallow pitched roofs comprising factory frame and panel components to allow for modern farm operational requirements including the need for efficient movement and access of machinery, and ventilation for larger numbers of stock. These buildings can have an industrial appearance and scale, therefore in assessing proposals for agricultural and forestry development and operations, the main considerations must be siting and design to ensure the landscape, wildlife, visual quality and historic character of the surrounding area is conserved, as well as avoiding possible environmental impacts and effects on neighbouring land uses, including residential. It is generally preferable in functional terms, and visually, for a new farm building to form part of an existing group. A landscaping scheme may also be required, which reduces the impact of the proposal on the wider landscape in accordance with CE-S1 Landscape Character and CE-D1 Protecting Exmoor's Landscapes and Seascapes.
- 7.51 Exmoor's landscape is valued for its diverse scenery and freedom from intrusive developments, therefore rarely will it be acceptable to locate a new isolated building in the open countryside where it is not well related to an existing building group. Large isolated farm buildings tend to be visually intrusive due to their scale, form and materials; impacting on visual amenity and landscape character. They can also be a security risk and services and infrastructure may not always be present. Applicants will

³⁶⁷ HM Government (2015) Town and Country Planning (General Permitted Development) (England) Order 2015. *The Stationery Office, London.*

need to demonstrate that very special circumstances exist to justify the functional need for a building in this context.

- 7.52 Proposals for new buildings on recently subdivided holdings will be the subject of particular scrutiny to ensure that an overriding functional need for the building can be justified and that they do not simply replace buildings that have been subdivided away from the holding. Changes in farming practice are unlikely to be a sufficient justification for a new farm building in an isolated location or on a recently sub-divided holding. Where a building can be justified, careful siting and emphasis on building design will be essential to integrate with the landscape; avoiding skyline sites or sites prominent from public viewpoints. There may be circumstances which require higher standards of design; the type and colour of materials will be an important consideration and traditional materials, such as using local building stone to clad lower walls, may be required on sensitive sites to help ensure the building conserves landscape character.
- 7.53 Potential impacts upon the natural environment will need to be addressed. Amongst other environmental considerations, proposals that could have an adverse effect on sites for nature conservation, should accord with Policy CE-S3 Biodiversity and Green Infrastructure. Measures should be taken to ensure that proposals avoid causing pollution including the fitting of covers for slurry stores (CC-S7 Pollution). Tracks should be as visually unobtrusive as possible by: following natural contours; not altering the natural topography; ensuring that the width is minimised; that water runoff is managed; that arrangements are in place to prevent soil or silty water running off including into watercourses; and avoiding the need to import materials from elsewhere. Surfacing should be with stone chippings or gravel and, in the case of a twin wheeled track, have grass in the middle to minimise its impact on the landscape.
- 7.54 Climate change and the increased risk of flooding due to increased extreme weather events are likely to change the way agriculture and forestry operates in the future in terms of associated mitigation and adaptation measures. Proposals for agricultural and forestry development will also need to accord with Policies CC-S1 Climate Change Mitigation and Adaptation and Policy CC-D1 Flood Risk.
- 7.55 There are many important historic farmsteads in the National Park³⁶⁸, and any proposals for agricultural or forestry development should not impact on the character and setting of these heritage assets. Similarly, care needs to be taken to ensure that impacts on the wider historic landscape and heritage assets such as archaeology are avoided. In assessing the impact on the historic environment, proposals should accord with Policy CE-S4 Cultural Heritage and Historic Environment.
- 7.56 In assessing proposals for agricultural and forestry development every effort should be made to minimise any impacts through the use of appropriate siting, design, layout, materials and surfacing. In the case of agricultural or forestry buildings or structures, dark grey (anthracite) fibre cement and timber cladding will be encouraged.
- 7.57 Agricultural and forestry development can often involve large machinery, which may adversely impact on existing transport infrastructure particularly historic bridges or fords. Proposals will therefore, also need to take account of any increase in traffic and potential impacts on transport infrastructure and accord with Policy AC-D2 Traffic and Road Safety Considerations for Development.
- 7.58 The Authority will consider attaching a condition to appropriate planning permissions requiring the removal of a building if it is no longer needed for agricultural purposes. Where new agricultural buildings with a floorspace of 500sqm or less are granted planning consent, permitted development rights may be withdrawn in respect of

³⁶⁸ Historic farmsteads are listed on the Exmoor National Park Historic Environment Record – www.exmoorher.co.uk

changes of use³⁶⁹ of agricultural buildings and any land within its curtilage to alternative uses. This is consistent with the designation of the area as a National Park where development plan policies do not provide for new buildings in the open countryside unless they are justified by reasons of agricultural or forestry need.

SE-S4 AGRICULTURAL AND FORESTRY DEVELOPMENT

- 1. Permission will be granted for new or replacement buildings, tracks and structures or extensions required for agriculture or forestry purposes where:**
 - a) it can be demonstrated there is a functional need for the extension, building, structure or track and its size and scale is commensurate with the demonstrated need;**
 - b) the building, track or structure is designed for the purposes of agriculture or forestry;**
 - c) in the case of new buildings, the site is related physically and functionally to existing buildings associated with the business;**
 - d) they are sited appropriately in the context of local topography and of an appropriate design that responds to and reinforces landscape character in terms of size, scale, massing, layout, external appearance and materials – if a landscaping scheme is required it should be in accordance with policy CE-D1;**
 - e) they do not generate a level of activity or otherwise detrimentally affect the amenity of surrounding properties and occupiers including through loss of daylight, overbearing appearance, or conflict with neighbouring land uses;**
 - f) appropriate measures are taken to ensure they do not, including through the level of activity, have an adverse impact on biodiversity and cultural heritage (in accordance with CE-S3 and CE-S4) or cause other unacceptable environmental impacts; and**
 - g) it can be demonstrated that opportunities have been taken for:**
 - i) the integration of passive design and sustainable construction methods to improve energy efficiency;**
 - ii) the integration of appropriate renewable energy technologies to reduce carbon emissions in accordance with CC-S5; and**
 - iii) minimising surface water run-off to avoid impacts on water quality (CC-D1).**
- 2. The National Park Authority will consider attaching a condition to any planning permission to require the removal of agricultural or forestry buildings when they are no longer required and the reinstatement of the land.**
- 3. New isolated buildings will not be permitted unless it can be demonstrated that there are exceptional circumstances relating to an overriding functional need for a more isolated location, and where:**
 - a) they do not replace existing agricultural buildings that have been subdivided away from the holding; and**
 - b) it is not as a result of a change in farming practice.**

³⁶⁹HM Government (2015) Town and Country Planning (General Permitted Development) (England) Order 2015. *The Stationery Office, London*. Part 3 of Schedule 2 to the General Permitted Development Order grants planning permission in respect of certain temporary buildings and uses.

8. ACHIEVING ENJOYMENT FOR ALL

Objective 8. *To provide opportunities for people from all backgrounds and abilities, including young people and new audiences, to learn about and enjoy Exmoor National Park, leading to a greater understanding of Exmoor and its way of life.*

Objective 9. *To maintain and improve the recreational opportunities in the National Park particularly the rights of way network, access to open country, other quiet and active recreation based on Exmoor's special qualities; and ensure that opportunities for recreation can be enjoyed by people from all backgrounds and of all abilities*

Objective 13. *To improve the sustainability, resilience and self-sufficiency of the National Park's settlements by supporting the retention, provision of, and access to community services and facilities.*

RECREATION AND TOURISM

CONTEXT

- 8.1 Recreation, tourism and environmental education developments provide opportunities for the understanding and enjoyment of Exmoor National Park. Proposals for such developments will be supported where facilities and activities accord with the principles of sustainable tourism. The policies in this section will relate to all developments that help to increase the understanding and public enjoyment of Exmoor National Park and its special qualities; this reflects the second statutory purpose of National Parks.
- 8.2 In terms of sustainable recreation and tourism development, national policy³⁷⁰ clearly states that such developments should be supported where they would have environmental, social and economic benefits to the area including for environmental conservation, rural businesses, visitors, and local communities. Such development includes the expansion of existing businesses in appropriate locations, where this will not compromise the National Park's special qualities, and recognising that tourism and recreation development may meet identified needs that are not provided by existing settlement facilities, and provide benefits for the education, health and well-being of local communities. The government published six key challenges³⁷¹ that should be addressed to ensure tourism is sustainable in a time of climate change.
- 8.3 The National Parks Circular³⁷² recommends that National Park Authorities continue to create a positive environment for sustaining rural businesses and developing future businesses appropriate to the high quality environment of the National Park, including those which capitalise on access, recreation and tourism where there are no unacceptable adverse impacts on the National Park's special qualities and people's enjoyment of them.
- 8.4 The National Park Authority will continue to support and work in partnership with others to help deliver the priorities for tourism identified through partnership working and the National Park Circular. Tourism and associated recreation activities are recognised as the main contributors to the Exmoor economy, and the natural environment of the area is acknowledged as being central to the prosperity of the sector. The importance of tourism in Exmoor is expected to continue and increase in the long term; supported through tourism partnerships and appropriate policies³⁷³. Achieving a year-round

³⁷⁰DCLG (2012) National Planning Policy Framework – Department of Communities and Local Government

³⁷¹DCMS (2009) Sustainable Tourism in England – A framework for action. Six challenges include: (i) minimise impact and resource use, (ii) address impact of tourism transport, (iii) improve quality and make holidays accessible to all, (iv) improve the quality of tourism jobs, (v) maintain and enhance community prosperity and quality of life, (vi) reduce seasonality of demand.

³⁷² DEFRA (2010) English National Parks and the Broads UK Government Vision and Circular (Paragraph 77)

³⁷³ Nathaniel Litchfield and Partners (2009) Exmoor National Park Employment Land Review

tourism economy increases visitor spend; helping to sustain essential local services and facilities and the working age population. The significance of the tourism and recreation sector is recognised by local communities and offers the potential to conserve and enhance Exmoor's special qualities, influence rural regeneration, and to retain and re-circulate money locally.

- 8.5 The high quality landscape, wildlife, cultural heritage, and experience of tranquillity that Exmoor provides are a major attraction for visitors and underpin the local tourism industry and recreation opportunities. In 2007 Exmoor National Park became the second English National Park to have been awarded the European Charter for Sustainable Tourism in Protected Areas³⁷⁴. This award recognises National Parks which are managing relevant development and activities based on sustainable tourism principles³⁷⁵.
- 8.6 Sustainable tourism is defined by The European Charter for Sustainable Tourism in Protected Areas³⁷⁶ as: *“any form of development, management or tourist activity which ensures the long term protection and preservation of natural, cultural and social resources and contributes in a positive and equitable manner to the economic development and well-being of individuals living, working or staying in protected areas.”* Sustainable tourism is aligned with the achievement of National Park statutory purposes and, if managed correctly, will bring positive experiences to visitors and benefits that will help to maintain Exmoor's natural environment, cultural heritage and communities.

RECREATION AND TOURISM CONSIDERATIONS

- 8.7 Policy RT-S1 supports the provision of accessible and inclusive tourism and recreation developments on Exmoor which encourage the quiet enjoyment and appreciation of the National Park special qualities for all, whilst providing environmental, economic and social benefits. Tourism has a number of benefits for local communities including an improved range of services and facilities, and more jobs; whilst greater use of local products and services by tourism businesses can benefit the local economy and the distinctiveness of Exmoor.
- 8.8 Policy RT-S1 and the associated development management policies (RT-D1 – RT-D9) provide scope to increase the diversity of visitor accommodation for potential visitors to Exmoor. This approach aims to build upon the tourism role of the settlements in the National Park and to provide farm diversification opportunities (SE-S3 Business Development in the Open Countryside).
- 8.9 Tourism survey³⁷⁷ data indicates that the length of stay increased in the non-serviced sector as the number of visitor days rose but number of visitors decreased; whereas the serviced accommodation experienced an increase in the number of short-breaks. There appears to be adequate capacity in terms of occupancy for both sectors; however occupancy levels increase during the main summer season (July-September) to between 80-90% for non-serviced accommodation. Visitor numbers can lead to additional pressures on natural resources such as water, although there are currently no issues of over-abstraction proposals should be mindful of water conservation and the requirements of policy CC-D2 Water Conservation.
- 8.10 The natural environment of Exmoor lends itself to certain outdoor recreation activities that rely on natural features and is ideally suited to quiet recreation pursuits including walking, cycling, and horse-riding that utilise the road network, rights of way and open

³⁷⁴ Awarded by the Europarc Federation

³⁷⁵ Europarc Federation: European Charter for Sustainable Tourism in Protected Areas – underlying principles – published online at <http://www.europeancarter.org/become-a-charter-area/charter-principles>

³⁷⁶ EUROPARC (2015) Definition of Sustainable Tourism

³⁷⁷ STEAM reports are produced for the National Park Authority by Global Tourism Solutions (UK) Ltd and provide a measurement of tourism at the local level from the supply side.

access land. The actual and potential recreational value of Exmoor is important for the health and well-being of residents and for those who visit the National Park; and has become a popular location for international and national outdoor events. Water-based recreation is also popular in some areas of the National Park including canoeing and fishing.

- 8.11 Policies RT-S1 and RT-D10 to RT-S2 have a positive approach to recreation; ensuring that the use or intensity of sports and recreational activities will be compatible with Exmoor's rights of way, natural beauty, wildlife, cultural heritage, tranquillity and the enjoyment of the special qualities in an area. Opportunities to enhance the access network and green infrastructure provision (CE-S3 Biodiversity and Green Infrastructure) through path improvements and new linkages, including across the National Park boundary, are encouraged. This will be particularly sought where development proposals can mitigate potential impacts on the access network (RT-D12 Access Land and Rights of Way).
- 8.12 Tranquillity is one of Exmoor's special qualities; providing an experience of calm in an area protected for its high quality landscapes. It is important for people's health, well-being and improving quality of life; and also significant for Exmoor's economy, as people come here to escape the noise disturbance and visual intrusion experienced in more urban areas. This does not imply no noise generation at all, but there are some recreational pursuits such as motorised sporting activities and clay-pigeon shooting grounds that are considered to be inappropriate in the National Park as they have the potential to have an adverse effect on the quiet enjoyment of others through exposure to noise disturbance that may be sustained for significant periods of the day, throughout the year (CC-S7 Pollution). Impacts on landscape character and tranquillity, through intensity of activity, noise, and overall scale will be key considerations in determining whether proposals for recreation and tourism developments are acceptable³⁷⁹.
- 8.13 Exmoor also provides opportunities for learning through a number of residential environmental education facilities used by schools across the country and managed by a number of public and private organisations. Most environmental education facilities have converted and changed the use of existing buildings and provide opportunities to reach a wide range of young people to encourage a deeper understanding and appreciation of Exmoor National Park and the benefits of outdoor recreation. Proposals which aim to provide these opportunities will be encouraged through the conversion or change of use of existing buildings in accessible locations in accordance with policy HC-S7 Residential Institutions.
- 8.14 The development of sites for recreation and tourism development on Exmoor should be small-scale in keeping with the pattern of development and conservation of the natural environment and cultural heritage of the National Park.
- 8.15 Proposals should be able to demonstrate that developments can be accessed safely and do not generate traffic levels that would have implications for the capacity of the access road and safety of road users. During the peak summer months traffic levels can rise considerably as many visitors to Exmoor choose to travel by car; this can lead to congestion in popular visitor destinations. Where possible, proposals should be accessible by more sustainable modes of travel – this will be expected to be demonstrated through a travel plan if significant traffic movements are likely to be generated (AC-S1 Sustainable Transport and AC-D1 Transport and Accessibility Requirements for Development).

³⁷⁹ The Countryside Agency (2004) Beyond the picturesque – Principles for sustainable tourism in National Parks and AONBs

- 8.16 The majority of recreation and tourism developments granted permission in recent years have related to changes of use or conversions of existing buildings, and this approach will continue to be encouraged.
- 8.17 There are very few examples where the conversion of redundant non-traditional (modern) farm buildings to tourism, recreation or education uses has occurred. This is due to the fabrication and structural limitations of such buildings which are often not suitable for such uses. However, where traditional buildings are either not available or suitable, due to their historic or biodiversity interest, for the intended recreation or tourism use, the change of use of such non-traditional agricultural buildings may be permitted (Policy CE-S5 Principles for the Conversion or Structural Alteration of Existing Buildings and SE-S3 Business Development in the Open Countryside).
- 8.18 New-build development for recreation or tourism facilities will be supported in principle, in sustainable and accessible locations consistent with the named settlements stated in Policy GP3 Spatial Strategy. Policy GP3 provides the overarching development strategy across the National Park; whilst development management policies RT-D1 – RT-D12 will have specific criteria including location, and appropriate measures relating to setting, scale and impacts. Tourism and recreation development should also have regard to policies CC-S1 Climate Change Mitigation and Adaption and CC-D1 Flood Risk in terms of their design, siting and location.

RT-S1 RECREATION AND TOURISM

- 1. Opportunities to provide a high quality, inclusive visitor experience on Exmoor through a diverse range of recreation and tourism facilities that actively enhance the understanding and enjoyment of the National Park’s special qualities will be encouraged.**
- 2. Development proposals should demonstrate that:**
 - a) They underpin the quiet enjoyment of the National Park. There are no unacceptable adverse effects on the natural and historic environment either individually or cumulatively through levels of activity or use.**
 - b) They contribute towards a sustainable future for Exmoor’s local economy and communities.**
 - c) They support the improved health and wellbeing of people living, working and visiting Exmoor through the benefits of recreation and experience of tranquillity.**
 - d) They ensure appropriate and safe access by the road network and where possible by walking, cycling, horse-riding and public transport.**
 - e) They safeguard the existing access network, including public rights of way, and access land; and provide enhancements where opportunities arise (RT-D12).**
 - f) They respond to opportunities to improve the quality and viability of existing recreation and tourism businesses, through appropriate restoration, extension, expansion or diversification.**
 - g) They are of a scale compatible with their location and setting, in accordance with the relevant development management policy considerations for tourism and recreation (policies RT-D1 to RT-D12).**

SERVICED ACCOMMODATION

- 8.19 Serviced accommodation is more generally referred to as Bed & Breakfast (B&B) establishments, guesthouses and hotels which forms a considerable proportion of the visitor accommodation available in the National Park. The national Quality in Tourism³⁸⁰ rating and classification of accommodation for VisitEngland states that hotel accommodation has a minimum of five letting bedrooms, is licensed and offers dinner – all bedrooms are en-suite or have a private bathroom. The proprietor or staff should be available during the day and evening (as a minimum) to receive guests and provide services³⁸¹. Guest house accommodation is generally smaller than hotels with a less structured service providing for more than six paying guests and run on a more commercial basis than a B&B – more services, such as dinner, are provided by staff as well as the owner. Where the primary use of the property is for guest accommodation, such as guesthouses and hotels, the use class is C1.
- 8.20 If the primary use of a building is a private dwelling house, the use class is C3 and B&B accommodation may be provided. B&B accommodation is run by the owner with more of a family home feel and approach. As B&B accommodation is generally ancillary to the primary residential use of the dwelling, planning permission for a material change of use is only required if the essential residential nature of the property has changed – i.e. the guest accommodation ceases to be ancillary. Other factors, such as the suitability of parking provision and impact upon neighbours' amenity, are also likely to influence a decision about whether a material change of use is necessary.
- 8.21 Many hotels and guesthouses on Exmoor have historic provenance; as they were built primarily for the purpose of providing guest accommodation. This is particularly relevant in locations, such as Lynton & Lynmouth, that became popular as a visitor destination in the 19th century, where a number of hotels were established from that time to meet demand. Other hotels and guesthouses across Exmoor were centred on the popularity of the area for field sports.
- 8.22 Hotels and guesthouses continue to be established in the National Park and contribute towards providing a unique experience for visitors to Exmoor. Extensive consultation highlighted that hotels and guesthouses, provided through changing the use and converting existing buildings, was suitable in the National Park. Existing buildings provide an opportunity for new serviced accommodation without the need for building new premises, which are considered to be less appropriate given the National Park designation and the potential scale of such development. The occupancy evidence available does not appear to support a need for new-build accommodation, however small scale extensions to existing serviced accommodation premises may enable the improvement to the overall quality and/or capacity over the longer term. For some proprietors, owning and running a hotel or guesthouse is a lifestyle choice and, although they may operate at full business capacity during the peak season, they may not be at full occupancy, as the majority are micro-businesses employing no additional staff³⁸².
- 8.23 The following policy provides for new serviced accommodation through the change of use of existing buildings where it should not result in significant alteration or extension and should have regard to policies relating to cultural heritage (CE-S4 Cultural Heritage and Historic Environment, and CE-D3 Conserving Heritage Assets) and the conversion traditional buildings (CE-S5 Principles for the Conversion or Structural Alteration of Existing Buildings). Any extension to existing premises should be subservient to the existing building/complex and appropriate in terms of materials, scale and massing with the host building (CE-S6 Design and Sustainable Construction Principles, and CE-D4

³⁸⁰ Quality in Tourism (2015) the assessment service provided for

³⁸¹ VisitEngland (2011) Hotel Accommodation – Quality Standard

³⁸² ENPA (2008) Exmoor National Park State of Tourism Report 2008 (page 10), *Exmoor National Park Authority, Dulverton*

Extensions). Extensions for staff accommodation should have regard to policy RT-D2 Staff Accommodation.

- 8.24 To enable new hotels and guesthouses to come forward, particularly those created from an existing residential use (use class C3) any subsequent permission to change use to serviced accommodation under this policy (RT-D1) will include a condition, to enable the use to revert to a dwelling house use in the future. In this particular situation, any extension to increase the floorspace of the hotel/guesthouse should not exceed 35% of the original floorspace of the property, in accordance with HC-D15 (Residential Extensions) – a condition will be attached in the granting of any permission to remove permitted development rights to prevent further extension when the use reverts to a dwelling house. If extensions to the hotel/guesthouse exceed the 35% proportion, then the property will not automatically be able to revert back to a dwelling house and proposals for change of use would need to meet the tests set out in RT-D3 Safeguarding Serviced Accommodation.

RT-D1 SERVICED ACCOMMODATION

- 1. Proposals for the provision of new serviced accommodation through the appropriate change of use and conversion of existing traditional buildings will be permitted where all of the following are met:**
 - a) the traditional character, appearance and setting of the building or building group is conserved or enhanced;**
 - b) the building or building group is capable of conversion to serviced accommodation and any other ancillary requirements without significant alteration or extension (CE-S5);**
 - c) the design layout of access and parking requirements are compatible with landscape character and built heritage;**
 - d) the intensity of use does not compromise local amenity; and**
 - e) traffic generation can be accommodated by the local road network without adversely affecting road safety and capacity.**
- 2. Small scale extensions which are subordinate to existing serviced accommodation will be permitted in accordance with policies CE-S6 and CE-D4 to improve the quality or capacity of the accommodation.**
- 3. In relation to proposals that seek a change of use from a residential dwelling (use class C3) to serviced accommodation (use class C1) a condition will be attached to a permission to enable the property to be used either as C1 Hotels or C3 Dwellings.**

STAFF ACCOMMODATION

- 8.25 Some serviced accommodation businesses including hostels, may require staff accommodation in certain situations e.g. where they need to meet or maintain a certain quality standard for 24 hour service, or where staff are not employed locally.
- 8.26 Applicants should provide evidence to support any application for staff accommodation to show that alternative accommodation cannot be found in the local area, or be provided within the hotel premises. In circumstances where additional staff accommodation is needed, it should be through the reuse of existing buildings on the premises (see policies CE-S4 Cultural Heritage and Historic Environment, and CE-S5 Principles for the Conversion or Structural Alteration of Existing Buildings), or where this is not possible, a small-scale extension that is subordinate to the existing property may be provided (CE-D4 Extensions). Independent, free-standing new build premises will not be permitted for such purposes. There will be no opportunities for successive

conversions or extensions for the purposes of staff accommodation, although staff accommodation that is no longer required may be permitted to change to extended guest accommodation, a non-serviced holiday let accommodation unit, or a dwelling to meet local affordable housing need.

RT-D2 STAFF ACCOMMODATION

- 1. Proposals for staff accommodation will only be permitted where it can be demonstrated that such accommodation is not available in the locality or cannot be provided within the existing hotel, guesthouse or hostel. Where this need cannot be met provision for staff accommodation will be permitted through:
 - a) the change of use and conversion of existing buildings that are within the curtilage in accordance with CE-S5, or where this is not possible;**
 - b) a small-scale extension to the hotel or guesthouse as a self-contained annexe.****
- 2. Staff accommodation will be tied through a condition or planning obligation to the existing premises, to ensure that it cannot be sold separately or occupied as a separate accommodation unit – other than for staff or owners.**
- 3. Where there is evidence that the need for staff/owner accommodation is no longer required, the following uses will be considered:
 - a) a local occupancy tie to meet local affordable housing needs (HC-S1);**
 - b) non-serviced holiday-let (RT-D4); or**
 - c) extension of guest accommodation.****
- 4. No further extension will be permitted for staff accommodation on premises where the previous staff accommodation has been lost to other uses.**

SAFEGUARDING SERVICED ACCOMMODATION

- 8.27 Although some new hotels and guesthouses have been permitted through the change of use of existing buildings in recent years, a larger number have been lost to residential use, through demonstrating that the business could not be made viable in the longer term. It is important, where ever possible, that existing serviced accommodation is safeguarded over the long term as in many villages and in the open countryside, they not only provide an economic benefit, but also a social function, for example: by having a public bar, function room or skittle alley. For the purposes of safeguarding serviced accommodation this policy will also apply to youth hostels. Where such a business is lost, it can have both economic and social implications for the local community. Furthermore, once lost, experience shows that they are unlikely to be replaced.
- 8.28 If permission is granted for a residential dwelling to change use to serviced accommodation in accordance with Policy RT-D1 of this Local Plan there are provisions to then enable the property to revert back to residential use with no requirement for planning permission (see paragraph 8.24). It is hoped that this policy approach will encourage new hotels and guesthouses to continue to come forward, without the uncertainty of not being able to revert back to residential in the future if the venture is unsuccessful.
- 8.29 Any material change of use from serviced accommodation should in the first instance be to another business/employment use within the existing building; this includes residential institutions such as nursing homes (policy HC-S7 Residential Institutions).
- 8.30 In certain circumstances, where a change of use is sought from an existing hotel or guesthouse (C1 use) to residential (C3 use), it is considered that a flexible approach

may be beneficial where the hotel/guesthouse could revert to residential use as a principal residence home (HC-S4 Principal Residence Housing) without having to demonstrate that the existing serviced accommodation is unviable. In such cases, the applicant will need to satisfy all of the tests below and provide evidence to demonstrate that the property:

- a) Was a single unit built for residential use and either existed as residential use on 1st July 1948 (when the 1947 Town and Country Planning Act was introduced) or was built as a residential property after this date - and can easily revert to a single residential unit providing a satisfactory living environment.
- b) Any alterations and/or extensions to the property since its hotel/guesthouse use is commercial have not exceeded would not meet the details of policy HC-D15 Residential Extensions.
- c) No community service or facility is provided by the premises – including public bar. The National Park Authority will require evidence of whether the current owner has closed such facilities prior to making an application for the change of use.

8.31 In the interests of ensuring flexibility and the needs of future tourism trends it is considered that those hotels/guesthouses that meet the tests to revert to a principal residence home, will have conditions attached to their planning permission to enable the use of their property to be principal home (HC-S4 Principal Residence Housing) or serviced accommodation if the property remains as a single unit.

8.32 Where a change of use other than business/employment use is sought, or the property does not meet the tests outlined in paragraph 8.30 above (clause 1b of policy RT-D3), the National Park Authority will require the hotel or guesthouse to demonstrate that the business cannot be continued or made viable. Evidence will be required to support such proposals and will include details of business performance and professional management, evidence of attempts to save the business, and proof of marketing. Evidence of marketing required to support the proposal should include:

- a) the property has been marketed for sale at a reasonable value that is consistent with its recent trading performance (or hotel market value if trading has ceased) for a period not less than 12 months. The guide price should reflect the potential earnings of the business and the cost of essential works;
- b) advertisement on site, in local newspapers, estate/property agents and, or otherwise as requested by the National Park Authority;
- c) re-advertising the premises (as above) at three month intervals if they fail to succeed in finding a willing buyer/occupier in the first three months of marketing;
- d) the owner/applicant to supply the National Park Authority with the advertisement details including sales particulars with a guide price to reflect the market value of the hotel/guesthouse;
- e) the owner/applicant to have provided the National Park Authority with written evidence of all enquiries received and the reasons why potential buyers/occupiers found the hotel/guesthouse to be unsuitable; and
- f) to provide impartial evidence regarding viability and marketing of the property an independent valuation of the property will be required from the District Valuation Office to inform the decision-making process.

8.33 The most favourable approach would be to diversify the business through the partial change of use of the building to non-serviced accommodation apartments (RT-D4 Non-serviced Accommodation), another employment use, or a community service/facility. A complete change of use will be considered where the partial change of use would not be possible or feasible in terms of viability or other material planning considerations.

- 8.34 Additionally, there may be an opportunity to increase the range of accommodation on the site through provision of small scale alternative camping accommodation (see RT-D9 Alternative Camping Accommodation).
- 8.35 Where an applicant is seeking a change of use from serviced accommodation to residential, proposals should first demonstrate that they cannot achieve any other use specified in clause 3(a) of the policy. Where the principle of residential use is accepted, proposals should accord with policy HC-D6 The Change of Use of Serviced Accommodation to Housing.

RT-D3 SAFEGUARDING SERVICED ACCOMMODATION

- 1. Development proposals that would involve the loss of existing serviced accommodation will only be permitted where:**
 - a) other employment uses are to be created in the existing building; or**
 - b) evidence clearly demonstrates the use can change to a principal residence dwelling (HC-S4) where:**
 - i) the use was formerly a single residential dwelling on 1st July 1948 or built as a single residential dwelling subsequently;**
 - ii) there has been no excessive alteration or extension; and**
 - iii) the existing use does not provide an additional community service or function.**
- 2. Where clause 1 does not apply, proposals relating to the change of use of serviced accommodation should demonstrate that the current use of the building as serviced accommodation cannot be continued or made viable in the longer term and the property has been marketed as a going concern at a reasonable value for a minimum period of 12 months. An independent valuation of the building will be required.**
- 3. Where it is demonstrated that the serviced accommodation is longer viable (clause 2), proposals for change of use should be compatible with the cultural heritage of the existing building, local character and amenity and in accordance with the following:**
 - a) Changes that will be considered acceptable in principle include:**
 - i) Change of use to self-catering apartments.**
 - ii) Change of use to provide community services or facilities.**
 - iii) A mixed use development, based on the uses listed above including employment use.**
 - b) Proposals for the change of use to residential dwellings will only be considered where the requirements of this policy are met and clause 3(a) cannot be achieved. Proposals should accord with HC-D6 Change of Use of Serviced Accommodation to Housing.**
 - c) In relation to 3 (a) and (b), opportunities for the partial change of use of the building or complex that supplements the existing serviced accommodation will be encouraged.**

NON-SERVICED ACCOMMODATION

- 8.36 Non-serviced or self-catering accommodation is a popular form of visitor accommodation that provides a wide range of accommodation choice for visitors to the National Park including holiday cottages (for static caravan and chalet developments – see policy RT-D8). However this form of accommodation has also caused local issues where a high percentage of existing dwellings are used as holiday cottages – this has particularly affected some popular holiday destinations such as Lynton & Lynmouth and smaller settlements where the impact of a relatively small number of holiday cottages can significantly affect the vitality of the local community.
- 8.37 The local planning authority cannot directly control or influence the use of existing open market homes as holiday cottages although it is recognised that in some areas this would be particularly supported by local communities. Planning can only control the change of use and conversion of existing buildings to holiday accommodation or the development of new units. Given the number of self-catering premises already available within the National Park, and the stock of existing buildings with capacity for change of use or conversion, it is considered that new build holiday-let accommodation is not appropriate in terms of the statutory designation of the National Park.
- 8.38 In circumstances where self-catering complexes (a property where there is more than one holiday let unit with a holiday occupancy condition) may wish to expand, the creation of additional units and the small scale extension of existing units, through the conversion of existing buildings, may be allowed to improve the capacity and/or quality of existing accommodation – where this will not detrimentally affect the character or historic interest of the building(s). Self-catering complexes may also have the capacity to diversify the type of accommodation they offer through provision of alternative forms of accommodation (see RT-D9 Alternative Camping Accommodation). Extension of existing holiday-let units or diversification can increase non-serviced accommodation capacity during the main tourist season where availability is at its lowest³⁸³.
- 8.39 The change of use and conversion of existing buildings to holiday let accommodation will be subject to policy CE-S5 Principles for the Conversion or Structural Alteration of Existing Buildings and will only be permitted where it relates to:
- a) RT-D3 Safeguarding Serviced Accommodation in terms of the partial/full change of use of a hotel that has demonstrated that it cannot be made viable or continued in the longer term;
 - b) the re-use of redundant buildings within the curtilage of a hotel premises; or
 - c) the diversification of a rural land-based business.

Proposals should also ensure that there is adequate utility provision close by including suitable access, and the capacity of the local road network is not compromised.

³⁸³ Global Tourism Solutions (2014) Exmoor National Park STEAM Draft Trend Report 2009-2013, *Exmoor National Park Authority, Dulverton*

- 8.40 The conversion of traditional farm buildings to holiday lets is a popular form of diversification for rural land based businesses. These rural buildings have historic significance, interest and sensitivity; therefore it is important that the whole farmstead complex of traditional buildings is not converted to ensure the retention of some of the original vernacular form and character of these traditional buildings – this will be decided on a case by case basis. This approach also enables space for ancillary storage, utility, or continuing agricultural use, and avoids the pressure for additional new build development in the future.
- 8.41 The evidence for occupancy levels is limited for this type of accommodation within the National Park. However policies in this Local Plan enable flexibility regarding ongoing use of such accommodation over the long term, not only through extension and diversification, but through change of use and variation of occupancy. Therefore if a holiday-let is no longer needed or viable according to changing circumstances, the use could be changed to a business or community use where it meets the requirements of the relevant policies. Holiday-lets fall within the same use class as a dwelling house, but the occupancy is controlled by condition so that it cannot be permanently occupied by a single person or household. Permission to change the occupancy to housing that meets local affordable needs or for extended family members may be permitted where it meets the requirements of policy HC-D13 Replacement of Holiday Occupancy Conditions and Extended Family Ties – this would enable the unit to revert to holiday accommodation if required in the future. This flexibility will help to maximise the use of a unit over the long term to meet the needs of the local economy and local communities.
- 8.42 Some non-serviced accommodation units may be over 90sqm and in such cases where there is a proposal to change the occupancy to housing that meets local affordable needs, a further condition will be attached to ensure that the property is not sold separately and remains as part of the wider complex or building group. This sustains the long term viability of the building and enables the occupancy to revert to a holiday let as part of the wider business at any time.
- 8.43 Conditions will be attached to any planning permission for holiday-let accommodation to limit the occupancy to short let holiday purposes only, so that the property may only be occupied by any person for a period not exceeding 28 days in any calendar year. This ensures that holiday lets are available all year round, rather than seasonally and helps to reduce the seasonality of demand on Exmoor. The conditions will also expect owners to maintain a register of occupants for each calendar year that may be inspected on request to ensure that such accommodation is not being permanently occupied as a dwelling house.

RT-D4 NON-SERVICED ACCOMMODATION

- 1. Proposals for the change of use and conversion of buildings to non-serviced accommodation will be permitted where they:**
 - a) create additional unit(s) on an existing self-catering complex;**
 - b) accord with RT-D3 Safeguarding Serviced Accommodation clause 3a);**
 - c) reuse a redundant building associated with a hotel/guesthouse premises; or**
 - d) relate to the diversification of a rural land-based business.**
- 2. Proposals should also meet the following principles:**
 - a) the character and appearance of the building and its setting is conserved, and where they accord with policies on landscape character, cultural heritage and design;**
 - b) in respect of changing the use of traditional farm buildings, the entire range of such buildings within a farmstead, will not be permitted to be converted to protect the historic character and significance of the buildings collectively (CE-S5);**
 - c) the design and layout of access and parking requirements are compatible with landscape character and built heritage, and the local road network has capacity to service the accommodation without adversely affecting road safety; and**
 - d) there are no adverse impacts on tranquillity and local amenity.**
- 3. Small scale extensions and alterations will be permitted to improve the quality and viability of existing non-serviced accommodation; where it would not adversely affect the historic character of the existing building. No new build units of holiday-let accommodation will be permitted.**
- 4. Where a non-serviced accommodation unit is no longer needed or viable, a proposal to replace the holiday occupancy condition of the unit with an agreement limiting occupancy to meet a local affordable need for housing or housing for extended families will be considered in accordance with policy HC-D13. In respect of changes to business or community use, proposals should accord with the relevant policies in the plan.**

TENTED CAMP SITES

- 8.44 Tented camp sites and camping barns offer more affordable forms of visitor accommodation in the National Park, providing wider opportunities for people to visit and experience Exmoor.
- 8.45 Camping on tented camp sites remains a popular form of visitor accommodation on Exmoor and is generally seen to be compatible with National Park purposes. There are a number of established small-scale camp sites across the National Park that range in type, from backpacker campsites with few or no facilities to more established sites that offer a greater range of facilities such as toilet/shower blocks, laundry rooms, and play areas. Tented camp sites are, for the purposes of this policy (RT-D5), defined as sites where tents are brought on to the site and erected by people staying there; where there is no degree of permanence and with no facilities within tented structures such as toilets, drainage, and water supply.
- 8.46 Site requirements for tented accommodation tend to have less visual impact than touring caravan sites, due to less rigid landscaping requirements and layouts for pitches etc. However, the location, siting, access and layout of such sites will require particular consideration including in terms of visual impact, compatibility with landscape character and wildlife interests, accessibility and local amenity.

- 8.47 In terms of the provision of facilities for campsites, preference will be given to the conversion and change of use of traditional buildings and proposals must comply with policies CE-S4 Cultural Heritage and Historic Environment, and CE-S5 Principles for the Conversion or Structural Alteration of Existing Buildings (clauses 1 and 2). Where there are no traditional buildings present or if they are unsuitable in terms of capacity or their wildlife/historic interest, then conversion of non-traditional buildings may be considered where the proposal complies with policy CE-S5 (clauses 1 and 3). In such cases provision for sewage disposal should accord with policy CC-D5 Sewerage Capacity and Sewage Disposal, to ensure that water quality is safeguarded.
- 8.48 Conditions to ensure that the site is only occupied through the main holiday season will help to protect the local environment and to allow site to recover from any intensive camping use through the holiday season. Small scale extensions may be permitted to existing campsites to improve viability or where appropriate diversify part of the site to alternative camping accommodation (see RT-D9). Environmental enhancement should be demonstrated as part of the proposal including biodiversity enhancements (CE-S3 Biodiversity and Green Infrastructure). This may also help vulnerable sites relocate out of sensitive areas including those at risk of flooding (CC-D1 Flood Risk). Where part of a site is relocated the existing area should be reinstated to its former use or included as part of a wider environmental enhancement scheme on the site.

RT-D5 TENTED CAMP SITES

- 1. Proposals for new small-scale tented campsites will be permitted where:**
 - a) they are well related to a named settlement, hamlet or farmstead;**
 - b) they are sensitively sited to ensure there are no adverse impacts on landscape character, visual amenity, or sensitive wildlife species and habitats;**
 - c) there is existing road access, and sufficient road capacity to serve the development; and**
 - d) they are not located within an area at risk of flooding.**
- 2. Any facilities that may be required to service the campsite should be provided through the conversion of suitable existing traditional buildings. Where such buildings are not suitable or available then the following opportunities may be sought:**
 - a) the conversion of structurally suitable non-traditional buildings that are functionally redundant; or**
 - b) the extension of existing buildings in accordance with the relevant policies in this plan.**
- 3. Opportunities for small extensions to existing campsite areas will be permitted where it does not conflict with principles listed above, and where environmental benefits are included as part of the scheme.**

CAMPING BARNES

- 8.49 Camping barns are also often referred to as bunkhouses, backpacker accommodation and hostels. They usually provide very basic accommodation and in more isolated locations very few facilities are provided apart from basic shelter; these are often referred to as 'stone tents'. There are very few camping barns on Exmoor, especially those which are available to the wider public – some remote hostels for example are owned by organisations or private charitable trusts. Camping barns include those well-established facilities at Northcombe Farm near Dulverton and Woodadvent Farm near

Roadwater, and establishments run by the Youth Hostel Association (Pinkery and Minehead) within the National Park. Opportunities exist for a network of this type of accommodation to be created, particularly close to existing long distance trails such as the South West Coast Path, Two Moors Way and the Coleridge Way.

- 8.50 This form of accommodation can bring redundant traditional farm buildings back into use, whilst allowing the integrity and historic fabric of the building to be preserved. Proposals should have regard to the use of traditional materials for the repair and reinstatement of these buildings (see CE-S5 Principles for the Re-use of Traditional Buildings). Where traditional barns are located in a farmstead or building group it is relatively straightforward to access and provide services and utilities underground as these will normally be accessible close by; this may allow a broader range of facilities and improved quality of accommodation (e.g. hostel type accommodation) subject to considerations to conserve the historic character of the building.
- 8.51 Isolated barns are important features in the landscape and their original fabric and setting should be retained as significant elements of their built form and their contribution to the wider landscape character; so that even when it has been adapted to a new use the visual appearance remains as an isolated barn. To ensure that the conversion of isolated barns to camping barns does not detrimentally impact on their character, form and setting, no access tracks, parking areas or curtilage should be created. Maintenance of these facilities should be minimal; therefore utility services should only be provided on-site through sustainable measures such as composting toilets, if they can be accommodated discreetly. To ensure isolated camping barns are accessible, they should be located close to the rights of way network or access land.

RT-D6 CAMPING BARNs

- 1. Proposals for the change of use and necessary alteration of a traditional building to a camping barn or hostel accommodation will be permitted where it complements the historic character and appearance of the building, biodiversity interests, and its setting within the landscape.**
- 2. Where the existing building is in a farmstead or hamlet in close association with an existing dwelling, or in a named settlement:**
 - a) parking and access arrangements should be incorporated within the hamlet/farmstead without detrimentally impacting on landscape character and visual amenity; or**
 - b) parking and access arrangements in a settlement are consistent with policies AC-D1 and AC-S3; and**
 - c) utility and service supplies will be routed underground.**
- 3. The change of use and conversion of a traditional barn or building in an isolated location to provide basic shelter in a camping barn (stone tent) with limited facilities for walkers, will be permitted where it can be demonstrated that:**
 - a) the building can be managed effectively without new access provision;**
 - b) the proposal does not involve alterations to the external fabric and surroundings of the building that would materially affect the character or appearance of the building and its setting;**
 - c) the building is well related to the rights of way network or access land; and**
 - d) any bat and barn owl roosts that may be present are maintained or replaced.**

CERTIFICATED CARAVAN AND TOURING CARAVAN SITES

- 8.52 Certificated caravan sites are small sites that are reserved exclusively for members of certain caravan and camping organisations. Under planning law these organisations can issue a certificate for these sites to temporarily site up to five touring caravans or motor-homes, without requiring planning permission³⁸⁴. They also inspect the sites to ensure that they meet basic requirements such as: a reasonably level site, safe highway access, drinking water, waste disposal and provision of disposal facilities for chemical closets.
- 8.53 Small certificated caravan sites will be encouraged where they are well integrated in the landscape, and avoid site improvements, such as hard-standing and utility hook-ups, which would require planning permission including changing the use of the land. These smaller sites will help to ensure that Exmoor continues to offer a diverse range of holiday accommodation which provides farms and other rural enterprises with opportunities for diversification.
- 8.54 The National Park Authority is consulted before any certificate is issued to the landowner and will support proposals that are compatible with landscape and highway requirements and the wider National Park objectives. Proposals should particularly avoid areas at risk of flooding (CC-D1 Flood Risk) and avoid disturbance of sensitive wildlife species and habitats including otter holts (CE-S2 Biodiversity and Green Infrastructure).
- 8.55 New commercial touring caravan sites are considered to be inappropriate within the National Park, due to the significant visual impact they can have on landscape character as a consequence of the degree of landscaping required to enable sites to accommodate the modern requirements of touring caravan parks; including access, parking, level pitches with hard-standing and associated utility and drainage provision. The adverse landscape impact is therefore considerable with or without caravans on the site. Consequently extensions to existing touring caravan sites or the provision for outdoor caravan storage facilities are also considered to be inappropriate in the National Park. Additionally Exmoor's road network has a high proportion of narrow, single track lanes that limits opportunities for such development, as they are generally unsuitable and impractical for towed caravans and large motor-homes to navigate safely.

RT-D7 CERTIFICATED CARAVAN AND TOURING CARAVAN SITES

- 1. New certificated caravan sites will be supported in the National Park where:**
 - a) they are well sited and integrated in the landscape and closely related to farmsteads, hamlets or settlements, with appropriate landscape screening where necessary;**
 - b) they are in a location where there are no adverse impacts on sensitive wildlife species and habitats;**
 - c) access and parking requirements can be easily accommodated without adversely impacting on landscape character and the historic environment;**
 - d) new permanent buildings, site excavation or other site improvements will not be required; and**
 - e) they are not located in an area at risk of flooding.**
- 2. Proposals for new touring caravan sites, outdoor caravan storage facilities, or extensions to existing touring caravan sites will not be permitted.**

³⁸⁴ HM Government (1960) Caravan Sites and Control of Development Act 1960 (First Schedule, paragraph 5). *The Stationery Office, London.*

STATIC CARAVAN SITES

- 8.56 There are very few static caravan sites found within the National Park. Those that do exist are generally small scale and have operated for a number of years.
- 8.57 Due to their colour, materials, form, uniform layout and permanency, static caravan sites often appear incongruous in the landscape, and can be detrimental to landscape and settlement character. Such forms of development are considered to be inappropriate within the National Park and will therefore be resisted. Opportunities to improve existing sites through reducing their overall visual and environmental impact by appropriate replacement accommodation units will therefore be encouraged. These sites should not be within an area with a high probability of flooding (flood zones 3a and 3b³⁸⁵ – see policy CC-D1 Flood Risk).
- 8.58 It is considered that static caravan sites could be replaced by appropriately designed holiday accommodation, such as single-storey timber chalets, camping pods, yurts, traditional Romany caravans or similar structures which offer alternative forms of holiday accommodation (RT-D9 Alternative Camping Accommodation). The proposals should demonstrate an overall visual and environmental improvement in terms of form, layout, materials, colour and landscaping, in accordance with policies CE-S1 Landscape Character and CC-S6 Design and Sustainable Construction Principles. A reduction in the overall number of units/pitches will be expected where there are three or more static caravans on the site and the restoration of pitches should provide a benefit for wildlife. In terms of new chalet/log cabin holiday accommodation; these structures will only be permitted where they replace units on existing static caravan sites or chalet developments.
- 8.59 All forms of non-serviced/self-catering holiday accommodation will have a seasonal or holiday occupancy condition attached to any permission that may be granted to ensure that the unit(s) can only be occupied for holiday purposes³⁸⁶.

RT-D8 STATIC CARAVAN SITES

- 1. Proposals for new static caravan sites and chalet developments for the purposes of holiday accommodation, or the conversion of existing touring caravan sites for such uses, will not be permitted.**
- 2. Development proposals to improve the quality of existing static caravan sites and chalet developments through appropriate replacement forms of holiday accommodation may be permitted where:**
 - a) replacement holiday accommodation is of high quality sustainable design and the materials, colour, form, siting and landscaping positively relate to landscape character (sites with three or more static caravans will be expected to reduce the overall number of units/pitches);**
 - b) there is no intensification of use or activity, and the site is retained as a single business unit;**
 - c) the existing site area is not extended;**
 - d) the relocation of existing pitches to less sensitive areas to provide environmental enhancement is achieved and where the number of pitches is not increased;**
 - e) there is no increase in facilities or services required for the site; and**
 - f) the site is not located in an area with high probability of flooding (CC-D1).**
- 3. New timber chalet or log cabin holiday accommodation will only be permitted where they replace units on existing static caravan sites or chalet developments.**

³⁸⁵ See Table 5.1 Flood Zone Definitions (pg 84)

³⁸⁶ DCLG (2014) Planning Policy Guidance – Use of Planning Conditions. Paragraph:003 Reference ID: 21a-003-20140306

ALTERNATIVE CAMPING ACCOMMODATION

- 8.60 A diverse range of accommodation provision is supported in the National Park³⁸⁷. Alternative forms of camping accommodation have become more popular, offering a range of different holiday experiences. Enabling the provision of such accommodation may lead to a wider range of visitors to the National Park that directly benefits the local tourism economy.
- 8.61 This form of accommodation, includes structures which generally are considered to be 'movable' or easily dismantled (usually considered under case/planning law as a caravan or tent), however they tend to vary in terms of their materials and form and in some cases are likely to remain 'on site' permanently. Examples include timber camping pods, micro-lodges, traditional Romany caravans, shepherd huts, tree-houses, yurts, wigwams and tepees – these structures provide a 'niche' form of low-impact visitor accommodation that have limited physical connection to the ground.
- 8.62 The visual appearance in the landscape is one of the most significant impacts that such proposals are likely to have in terms of their arrangement and uniform appearance. However, alternative forms of accommodation can be more sympathetic in terms of colour and materials (e.g. timber) and form than static or touring caravans. Proposals should ensure that: the overall number of structures remains low; they are well designed; and sensitively sited in terms of landscape, wildlife and historic environment considerations. The National Park Authority considers that structures can be more effectively screened in the wider landscape, when set against or within mature woodland or well-treed areas. Opportunities for site enhancement through the design and management of the site and associated planting e.g. for screening, will be encouraged (CE-S3 Biodiversity and Green Infrastructure and CE-D2 Green Infrastructure Provision).
- 8.63 Concrete pads or bases for the floor area of these structures are not considered to be acceptable. Timber platforms or decking which can be easily removed from the site, if required, are more aesthetically pleasing and have less impact on the ground surface. Site works and areas of hard-standing to accommodate this type of accommodation should be minimised to complement the natural topography of the area. Extensive alteration to ground levels and engineering works would have a considerable landscape impact and should be avoided. Careful consideration should also be given to the design and use of materials used for pathways leading to or between structures in terms of the colour and degree of permanence – light/contrasting colours and uniform paving should be avoided.
- 8.64 To avoid these temporary structures being considered as dwellings or mobile homes within the National Park (and therefore would be considered under more stringent policies of restraint in the open countryside), such structures should provide basic holiday accommodation similar to that described under 'tented' camp sites (see policy RT-D5). These holiday accommodation units should have an internal floor space no larger than 25sqm and should only provide basic facilities for sleeping, seating and eating without installation of underground/overground pipework for foul drainage systems. This ensures that such structures do not generate a level of permanence that could increase the degree of landscape impact and site restoration should removal of

³⁸⁷ ENPA (2010) Your Future Exmoor Tourism Topic Group discussion, *Exmoor National Park Authority, Dulverton*

structures be required. Additional facilities (if not already present) should be provided separately from the accommodation unit, as they are on camp sites, through the change of use and alteration of suitable existing buildings (CE-S5 Principles for the Conversion or Structural Alteration of Existing Buildings) or as an extension to existing facilities to service the need of additional visitors (i.e. where visitor numbers are increased on site by the proposal rather than maintained at a similar level).

- 8.65 The policy allows for 'small-scale' alternative camping proposals as a diversification opportunity for existing accommodation providers and land-based businesses. It is not considered to be appropriate to set a maximum figure for the number of such structures – small-scale proposals will be determined by the National Park Authority in relation to factors including the scale of the existing accommodation enterprise, landscape character and/or the relationship with existing buildings and structures.
- 8.66 Alternative forms of camping accommodation could replace existing static caravans on sites where associated facilities are already present and where it can be demonstrated that the landscaping, siting, design and materials of the proposed structures are appropriate (see policy RT-D8). Alternative 'camping' experiences may also be permitted as diversification for land-based businesses or a diversification of accommodation offered by existing camping and caravan sites, hotels/guesthouses (C1 use) and self-catering complexes (where there is more than one holiday let unit with a holiday occupancy condition); with the intention of helping to strengthen and sustain rural tourism businesses. Bed & Breakfast businesses which operate within a residential dwelling (C3 use) will not be permitted to diversify in this way to avoid the proliferation of such structures within any residential curtilage. Proposals should be physically and functionally linked to an existing business, and not require the need for additional permanent residential accommodation, including staff accommodation. In all cases such structures should not be located in an area with a high probability of flooding. As they are sites with temporary structures used for holiday occupation then they would be classified as 'more vulnerable' subject to a specific warning and evacuation plan. The sequential and exception tests should also be applied (see policy CC-D1 Flood Risk)³⁸⁸.
- 8.67 The scale of the overall proposal should minimise the need for additional parking capacity through the extension of existing parking areas or creation of new parking facilities – particularly where greenfield land is utilised. Other approaches, such as encouraging sustainable forms of transport (AC-S1 Sustainable Transport) or informal/temporary parking arrangements (AC-D4 Temporary Parking), may provide alternative solutions to increasing parking capacity. In circumstances where the need for additional parking provision can be demonstrated, the scale should only meet the minimum parking requirement in relation to additional visitor numbers generated and not cause unacceptable harm to the National Park or its special qualities. Additional need for parking should not be generated where the proposed structures are replacing existing pitches for static caravans, chalets or touring caravans.

³⁸⁸ DCLG (2015) Planning Practice Guidance: Flood Zone and Flood Risk Tables, Table 2: Flood Risk Vulnerability Classification Paragraph [Online] <http://planningguidance.planningportal.gov.uk/blog/guidance/flood-risk-and-coastal-change/flood-zone-and-flood-risk-tables/table-2-flood-risk-vulnerability-classification/>

- 8.68 In terms of extensions to existing parking areas, the design should be well integrated with its surroundings in terms of landscaping, surface treatments and layout. For new parking arrangements, proposals should be well-related to existing buildings and make best use of any existing hard-standing. The creation of separate parking bays adjacent to the accommodation structure is not acceptable due to the increase of likely landscaping works and impacts on visual amenity and landscape character. Where the use of greenfield areas are proposed, the design of parking arrangements should reflect and respond to landscape character; utilising locally sourced low-impact natural materials for surfacing. More permanent and impervious man-made surface treatments (e.g. tarmac or concrete) should be avoided.
- 8.69 Conditions will also be attached to any planning permission to ensure that:
- a) Occupation is limited to holiday use only so the structure will not be used as a permanent residence;
 - b) Where structures become redundant they are removed and the site is reinstated to its former use;
 - c) Only the approved structures are placed on the application site and external finish and colour are maintained;
 - d) No fences, buildings or ancillary structures are erected without further granting of planning permission; and
 - e) Any planting or landscaping schemes are in place prior to siting the structures, and existing landscape features retained. Alterations to the landscaping / planting scheme permitted would be subject to the written approval of the local planning authority.

RT-D9 ALTERNATIVE CAMPING ACCOMMODATION

- 1. Small-scale, low impact alternative camping accommodation proposals will be permitted where:**
 - a) they are only used for the purposes of holiday accommodation;**
 - b) the overall development is small-scale in terms of area and number of units and will not require additional permanent residential accommodation to manage the site;**
 - c) the net floor space of each unit is less than 25sqm and will not be connected to a foul drainage system;**
 - d) they are of high quality sustainable design and demonstrate that the siting and landscaping strongly relate to the landscape and historic character of the area; and is appropriate to its setting (locations that are well screened by woodland or well-treed settings are preferred and should meet the tests in this policy);**
 - e) they have low environmental impact through limited physical connection with the ground by ensuring that any hard-standing and site works are minimal to complement the natural topography and landscape character of the area; avoiding extensive alteration to ground levels and fencing;**
 - f) the need for additional facilities is clearly demonstrated and commensurate with the level of anticipated need, are provided within an existing building or as a modest extension to existing facilities; and**
 - g) where the need for additional parking is demonstrated, provision should reflect the minimum level of need;**
 - i) Small-scale extensions to existing parking areas should be well designed, landscaped and integrated with the site and its setting.**
 - ii) New parking provision should be well related to existing buildings and make use of existing hard-standing where possible. On greenfield areas, parking should reflect landscape character, be informal in layout, and avoid permanent impermeable surface treatments.**
 - iii) Separate parking bays adjacent to the proposed accommodation structures should be avoided.**

and

 - h) there are no adverse impacts on sensitive habitats and wildlife.**
- 2. The site is located outside areas with high probability of flooding, and:**
 - a) where proposals meet the requirements of RT-D8 to replace existing units on static caravan sites; or**
 - b) as part of a diversification proposal for land-based businesses, sited close to the farmstead and where additional site facilities can be provided through the change of use of existing buildings; or**
 - c) as part of a diversification proposal for existing accommodation premises comprising hotels/guesthouses (C1 use), self-catering complexes, and camping and caravan sites; where there is capacity in terms of area, highway access, and existing facilities without impacting on local amenity.**
- 3. Conditions will be attached to any permission to ensure that the site will be occupied and managed in a manner that will not harm the local area. Opportunities should be taken to enhance the restoration of the site that will support biodiversity and green infrastructure.**

RECREATIONAL DEVELOPMENT

- 8.70 Exmoor is ideally suited to recreation pursuits that are based on its natural assets including walking, horse riding, cycling, watersports, coastering and interest in its natural beauty including wildlife watching and photography. Recreational development can provide benefits for the health and well-being of local communities and visitors, and support the local economy, by providing employment including opportunities for apprenticeships and training. Exmoor has proven to be an excellent venue for local, national and international outdoor events which have included, the Exmoor perambulation, Exmoor Explorer mountain bike ride, Exmoor Stagger run, Exmoor Golden Horseshoe endurance riding event, a stage of the National Tour of Britain cycle race and the International 'Ironman' triathlon. Some aspects of recreational activity, such as events that take place on a temporary basis (up to 28 days in a calendar year), do not require planning permission. In many cases, these can be accommodated without harm to the National Park or its users and can play a part in enriching the area. The National Park Authority encourages pre-application discussions to determine whether planning permission is required.
- 8.71 There are also a number of recreational pursuits which do not require physical activity, which are appropriate to the National Park, such as photography, painting and star gazing³⁸⁹. The re-use of existing buildings for indoor recreational pursuits may also be suitable in the Exmoor context, for example, to provide 'wet weather' recreational facilities.
- 8.72 Other outdoor pursuits include commercial game shooting which has expanded on Exmoor since the 1990s and brings valuable income to the local economy, and supports tourism businesses outside of the main season. Activities and associated development, such as rearing pens, game crops, feeding equipment have the potential to individually and cumulatively adversely impact landscape and access to and enjoyment of it. The Greater Exmoor Shoots Association (GESA) is the membership organisation for local shoots based in and around Exmoor National Park. They are a lead partner in encouraging the good environmental management of Exmoor game bird shoots and minimising visual impacts³⁹⁰. Well managed shoots provide habitat for wildlife and contribute to the management of the landscape. Guidance on voluntary codes of conduct³⁹¹ is available from Exmoor National Park Authority, to help ensure that shoot-related development and activity (including signage and safety) conserves the National Park's natural beauty, wildlife and habitats, and tranquillity, and has regard to public safety and access rights³⁹².
- 8.73 Certain activities relating to the shooting of game may need planning permission. Where birds are reared and shot for sporting purposes for more than 28 days in a calendar year it is likely that planning permission is required even if the activity takes place on existing agricultural land unless the shoot has a long established use in planning terms. The National Park Authority will provide advice on whether planning permission is required. Proposals for commercial game shooting in the Exmoor context should also demonstrate that they are part of a farm diversification scheme (SE-S4 Agricultural and Forestry Development).
- 8.74 As the leisure sector is fast-changing with patterns and popularity of uses changing over time, it is not appropriate to specify particular recreational activities within this policy or provide an area based approach. Proposals will be determined on a case-by-

³⁸⁹ Exmoor became an International Dark Sky reserve in 2011

³⁹⁰ ENPA (2012) Exmoor National Park Partnership Plan 2012-2017, *Exmoor National Park Authority, Dulverton*

³⁹¹ ENPA (2007) – The Exmoor Guidelines for the Management of Gamebirds within the National Park, *Exmoor National Park Authority, Dulverton*

³⁹² ENPA (2010) Your Future Exmoor consultation events, *Exmoor National Park Authority, Dulverton*

case basis using the principles set out in RT-D10 Recreational Development, to enable a flexible approach over the plan period. Appropriate facilities to enable recreational activities which promote the understanding and enjoyment of, Exmoor's special qualities and contribute to the local economy and employment are encouraged³⁹³.

- 8.75 The scale, design and intensity of use or activity are important factors in determining whether a proposed development is compatible with the locality, historic environment, biodiversity, landscape character and visual amenity of the area. The cumulative impact of existing or proposed development will also be a material consideration in determining planning applications (CE-D1 Protecting Exmoor's Landscapes and Seascapes).
- 8.76 The majority of recreational activities and facilities on Exmoor that utilise the outdoor natural resource are small scale and dispersed and these are most likely to be suitable in the Exmoor context. However, some recreational activities, particularly noisy pursuits, can conflict with the National Park's special qualities and enjoyment of them³⁹⁴, particularly tranquillity (RT-S1 Recreation and Tourism). Other impacts on the National Park's special qualities, such as biodiversity should also be key considerations for proposals. Activities which will conflict with the National Park's special qualities including through visual intrusion, noise and causing erosion are not appropriate in the National Park (CC-S7 Pollution). New recreational activities may also conflict with other recreational pursuits in the locality. To minimise impacts, a number of measures, some of which are outside the planning system, can be used such as voluntary codes of conduct, monitoring of illegal motor vehicle activity and use of temporary or permanent Traffic Regulation Orders as appropriate. Although often viewed as a 'green' use of the countryside, golf courses are not considered to be compatible with the National Park's designation due to the impacts of formalisation and standardisation of the landscape that destroy the fabric and landscape character of an area and biodiversity.
- 8.77 Development should be focussed in or adjoining named settlements (GP3 Spatial Strategy). Special justification will be required for recreation development proposals to be located in the open countryside; where they are closely associated with existing recreational development or rural land-based diversification (SE-S3 Business Development in the Open Countryside). In certain circumstances, proposals may be capable of being accommodated in the open countryside away from existing development. In such cases, the development should enhance the understanding or enjoyment of the special qualities of the National Park and applicants will be expected to clearly demonstrate that such a location is essential for the development without causing unacceptable adverse impacts on the natural and historic environment.
- 8.78 Proposals should, in the first instance, make best use of existing buildings consistent with GP4 Effective Use of Land and Buildings. Proposals should also ensure that access arrangements are adequate, that the local road network has the capacity to service the development including during the peak season and that any necessary parking can be accommodated unobtrusively. Travel plans may be required where proposals are likely to result in significant traffic generation and opportunities for access by sustainable means will be encouraged (AC-S3 Traffic Management and Parking).

³⁹³ ENPA (2010) Your Future Exmoor consultation events, *Exmoor National Park Authority, Dulverton*

³⁹⁴ DEFRA (2010) English National Parks and the Broads UK Government Vision and Circular (Paragraph 26)

- 8.79 Where a building/structure for recreational development becomes redundant the development should be removed and the land should be restored to its former condition to minimise its impact on the natural environment and landscape of the National Park. Environmental enhancement will be encouraged as part of any restoration.

RT-D10 RECREATIONAL DEVELOPMENT

- 1. Proposals for recreational development that support a sustainable local economy will be permitted where it can be demonstrated that, individually and cumulatively:**
 - a) they reuse traditional buildings and where appropriate non-traditional buildings. Where the need for a new building is clearly demonstrated siting should be well related to existing buildings;**
 - b) the location together with scale, and intensity of use or activity (including seasonal impacts) is appropriate in relation to the historic environment, wildlife sensitivity, landscape character, visual amenity and existing enjoyment of the area;**
 - c) it is in or adjoining a named settlement (GP3);**
 - d) where they cannot be accommodated in a named settlement, the development will enhance the understanding and enjoyment of the special qualities of the National Park, and it can be clearly demonstrated that such a location is essential for development;**
 - e) there is adequate access, including by sustainable modes of transport;**
 - f) parking can be accommodated unobtrusively and the existing local road network has capacity to service the development (AC-S3); and**
 - g) the development will be removed and land restored to its former condition when the building/structure becomes redundant unless planning permission is granted for an alternative use. Environmental enhancement will be encouraged when the land is restored.**

EQUESTRIAN DEVELOPMENT

- 8.80 Owning and riding horses are traditional and popular activities on Exmoor³⁹⁵ for residents and visitors alike, and horse related development can be compatible with National Park purposes. Managed well, any visual intrusion or other potential impacts from associated buildings, enclosures, fences, increased traffic, light and noise pollution can be minimised to an acceptable level in the environment.
- 8.81 Landscape and wildlife impacts resulting from overgrazing can be minimised by ensuring there is an appropriate amount of land available for horse grazing. The British Horse Society recommends as a general guideline a ratio of two horses per hectare on permanent grazing (1-1.5 acres per horse)³⁹⁶; this would be considered a minimum in the National Park because of the nature of the land³⁹⁷. The type of field boundary and sub-division of fields can also affect landscape character. Sub-dividing fields with a variety of materials such as electric tape fencing often gives an impression of clutter, fragmentation and over intensive use of the land. When keeping horses in areas accessible to the public, horse keepers should ensure they do not detrimentally impact the access network or cause risk to the public including as a result of the sub-division of fields. Impacts can be managed by following best practice advice for example:
- a) Local or traditional approaches should be used e.g. hedgebanks and native hedging
 - b) Avoid or minimise sub-division of fields where possible. If sub-division is necessary mirror the lines of existing field boundaries and use low visibility/mute coloured materials.
- 8.82 Horse owners also have a 'duty of care' to ensure horse waste is stored and disposed of responsibly to protect amenity and avoid ground and water pollution (CC-S7 Pollution).
- 8.83 There is the potential for formalised facilities, such as manèges, livery yards and pony trekking centres, to have adverse landscape effects, such as the over-use of the surrounding access network, which can have an environmental impact and affect other users, such as walkers. Additionally, equestrian development and the sub-division of fields can affect the landscape character of the National Park³⁹⁸. Policy RT-D11, whilst supportive of equestrian activities because they are part of the history and culture of Exmoor, seek to ensure the very best management of horses and pasture in the context of the National Park and its special qualities.
- 8.84 In some cases, planning permission may not be required e.g. the grazing of horses on agricultural land is regarded as agricultural use. However in certain circumstances, planning permission will be needed for the change of use of land e.g. the sub-division of agricultural land into paddocks and shelters for horses is likely to be regarded as a change of use to recreational land. Usually, if the grazing is part of an activity, such as a livery, it will require planning permission for change of use of the land.
- 8.85 The policy applies to horse related development including stabling/loose-boxes, manèges/ exercise arenas, livery yards, hay barns, feed stores, tack rooms, new gateways, tracks or access points onto highways, permanent jumps, lighting and any consequent engineering work, such as earth moving. Discussions with the National Park Authority at an early stage are encouraged to determine whether planning permission is needed and officers will provide advice if a formal application is required. Horse owners are advised to check whether the land they use for any equestrian activity has planning permission.

³⁹⁵ ENPA (2007) Exmoor National Park Landscape Character Assessment, *Exmoor National Park Authority, Dulverton*

³⁹⁶ South West England (2010) SWPLF Equestrian Guide

³⁹⁷ Kent Downs AONB recommend 2.5 acres per 500kg horse for resting and rotation

³⁹⁸ ENPA (2007) Exmoor National Park Landscape Character Assessment, *Exmoor National Park Authority, Dulverton*

- 8.86 To minimise adverse landscape effects on the National Park, horse related development (where horses are to be kept) should always be close to the property it is intended to serve. 'Where horses are to be kept' refers to the location where horses are to remain for the majority of the time; this may include structures/buildings used as shelter for horses. Existing buildings should be reused in the first instance, where they are available and appropriate for the type of equestrian development proposed – consistent with policy CE-S5 Principles for the Conversion or Structural Alteration of Existing Buildings. New equestrian development will only be appropriate where it is well related to existing buildings. Where new buildings are required, they should achieve a high standard of design (SE-S4 Agricultural and Forestry Development). Consideration will need to be given to the siting, scale, design, materials, colour and landscaping of new development. Where artificial lighting is proposed, this should be consistent with CE-S2 Protecting Exmoor's Dark Night Sky and CC-S7 Pollution. Proposals must also demonstrate they do not cause harm to the natural environment and the access network (RT-D12 Access Land and Rights of Way). Where development is likely to generate traffic movements, the proposal should have regard to policies AC-D1 Transport and Accessibility Requirements for Development and AC-D2 Traffic and Road Safety Considerations for Development.
- 8.87 Conditions will be used where appropriate and may include that:
- a) the development is limited to domestic use where the proposal is intended for this purpose;
 - b) the development should not cause harm to equestrian routes, this can include through limiting the number of horses;
 - c) the removal of the building/structure and restoration of the land to its former condition should the use cease to be operational unless planning permission is granted for an alternative use.
- 8.88 Some equestrian development can be incongruous in the landscape and its proliferation could therefore have adverse visual amenity and the landscape effects. The cumulative impacts of equestrian development will be a material consideration in determining planning applications (CE-D1 Protecting Exmoor's Landscape and Seascape). In some cases a temporary consent may be considered in order to ascertain whether equestrian development will be acceptable in the longer term.
- 8.89 All proposals for equestrian development will be required to submit a land management plan as part of their planning application. The following factors, based on good practice guidance prepared by the National Park Authority, should be considered when compiling a land management plan for equestrian development including:
- a) Managing grazing
 - b) Managing waste
 - c) Means of enclosure and boundary treatments
 - d) Tree and hedge protection/management
 - e) Buildings and Structures
 - f) Impacts on Public Rights of Way
 - g) Soil structure
 - h) Managing invasive species e.g. ragwort
- 8.90 The preparation of a land management plan should be relative to the scale of the proposed development and the activity likely to be generated; larger-scale equestrian development including pony trekking and livery yards will therefore be required to

provide detailed land management plans to fully explain how the factors listed above will be addressed.

- 8.91 The policy would, in principle, provide for proposals for stabling at visitor accommodation businesses, such as hotels, where they would support equine tourism, provide short-term shelter for horses.

RT-D11 EQUESTRIAN DEVELOPMENT

- 1. Proposals for equestrian development will be permitted where it can be demonstrated that they:**
 - a) do not adversely affect the natural environment, amenity of the surrounding area, or neighbouring properties either directly or indirectly including through pollution;**
 - b) re-use existing traditional buildings or, where appropriate, non-traditional buildings in accordance with CE-S5. Where the need for a new building is clearly demonstrated, siting should be well related to existing buildings;**
 - c) do not cause unacceptable levels of traffic in terms of the environmental or physical capacity of the road network, and do not prejudice road safety interests;**
 - d) are sited sensitively in terms of visual impact and the landscape setting of the area, and in terms of the intensity of use or activity;**
 - e) are of an appropriate scale, well designed and, unobtrusive in their form, in terms of their height, position and materials including by means of enclosure. Proposals should reflect the character and form of existing traditional development;**
 - f) have adequate and suitable grazing land to support the development proposed;**
 - g) are well related to suitable networks of equestrian routes which are capable of supporting the additional use in accordance with RT-D12 Access Land and Rights of Way. Where appropriate, horses will be regulated to a number which will not cause harm to equestrian routes, the landscape or nature conservation; and**
 - h) ensure the site is managed in accordance with an agreed land management plan.**
- 2. In the case of development proposals that involve the keeping of horses, the development shall be sited close to the dwelling it is intended to serve.**

ACCESS LAND AND RIGHTS OF WAY

- 8.92 The access network provides a means of sustainable transport and enables popular recreational activities that promote healthier living which is advocated by National Policy. Planning policies should protect and enhance public rights of way and access and local authorities are encouraged to seek opportunities to provide better facilities for users, such as by linking existing rights of way networks³⁹⁹.
- 8.93 Walking is a popular recreational activity on Exmoor, often being cited as the main reason for visiting the National Park⁴⁰⁰. Cycling and horse-riding are also popular activities. Such interests utilise the extensive access network, which in the context of the policy includes Public Rights of Way (PRoW), access land⁴⁰¹, statutory and permitted cycle routes, permissive paths and roads used for these purposes. By providing the means for such activities the access network plays an integral role in promoting the enjoyment of the National Park for both visitors and local communities alike. As the access network has an important influence on the number of visitors to Exmoor, it makes a valuable contribution to the local economy of the area including for a significant number of local businesses. It can also provide important habitats and linkages for the biodiversity of the National Park, be identified as an element of the historic environment and a valuable feature of the landscape character of Exmoor.
- 8.94 A high standard of maintenance, clear way-marking and the minimisation of any conflicts between path users and landowners are vital to the enjoyment of the access network. The legal responsibility for the maintenance of PRoW lies with Devon and Somerset County Councils, which has been delegated to Exmoor National Park Authority for many years. Exmoor National Park Authority liaises with farmers and land managers to address any issues arising from PRoW across their land. A large proportion of the network is available to pedestrians, cyclists and equestrian users. Users' interests encompass the physical use and the understanding, enjoyment and experience of the access network including views and tranquillity. Opportunities to enhance the access network to improve the inclusiveness and enjoyment of the network to users of all abilities will be sought.
- 8.95 Climate change may result in an increased need for maintenance of the access network. The Exmoor National Park Partnership Plan includes measures to ensure the maintenance and improvement of the rights of way network as a special quality of the National Park⁴⁰². The Rights of Way Improvement Plan (RoWIP) for Devon and Somerset⁴⁰³ also include objectives and priorities for improving the PRoW network for the benefit of all users on Exmoor.
- 8.96 Policy RT-D12 seeks to ensure that the existing access network is not adversely affected by development proposals. In recognition of the network's important role it will be protected from development that is likely to prejudice current or future use. Proposals that enhance the network and improve existing routes including the provision of linkages between routes will be encouraged (CE-S3 Biodiversity and Green Infrastructure, and CE-D2 Green Infrastructure Provision).

³⁹⁹ DCLG (2012) National Planning Policy Framework – Department of Communities and Local Government

⁴⁰⁰ ENPA (2010) Your Future Exmoor consultation events, *Exmoor National Park Authority, Dulverton*

⁴⁰¹ HM Government (2000) Countryside and Rights of Way (CRoW) Act 2000, *The Stationery Office, London*

⁴⁰² ENPA (2012) Exmoor National Park Partnership Plan 2012-2017, *Exmoor National Park Authority, Dulverton*

Priority B2: Maintaining high quality rights of way, services and facilities to enhance enjoyment and understanding of the National Park

Objective 9: To maintain and improve the recreational opportunities in the National Park particularly the rights of way network, access to open country, other quiet and active recreation based on Exmoor's special qualities; and ensure that opportunities for recreation can be enjoyed by people from all backgrounds and of all abilities

⁴⁰³ Devon County Council (2005) Improving Devon's Environment: rights of Way Improvement Plan 2005 (pages 85-121)
Somerset County Council (2006) Rights of Way Improvement Plan November 2006 (section 10)

- 8.97 Where proposals are likely to result in an increase in the intensity of vehicular use on shared access routes, applicants will need to demonstrate that the safety, ease of use and enjoyment of the access network by all users will be maintained; including the condition.

RT-D12 ACCESS LAND AND RIGHTS OF WAY

- 1. The access network will be safeguarded by ensuring that development proposals will not adversely affect:**
 - a) the condition of the access network;**
 - b) users' interests; and**
 - c) character and appearance.**
- 2. Where proposals will adversely affect the access network applicants will be required to demonstrate that:**
 - a) the need for and benefit of the development clearly outweighs any harm to the current access network;**
 - b) there is no appropriate alternative location;**
 - c) any harm will be kept to a minimum;**
 - d) the affected network will be improved and enhanced to protect users' interests;**
 - e) opportunities have been sought to provide linkages between routes, and strengthen the green infrastructure network; and**
 - f) an acceptable diversion and/or compensatory land of equal or better quality are provided where necessary.**

SAFEGUARDING LAND ALONG FORMER RAILWAYS AND REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY

- 8.98 Former railways are important heritage assets which form a valuable component of the cultural heritage of Exmoor National Park. They can also: be re-used as part of the access network e.g. as walking or cycling routes; act as important wildlife corridors/links between habitats for species such as dormice and bats; become a part of the green infrastructure network; or may be reinstated as part of the transport network.

West Somerset Mineral Line

- 8.99 The 11.5 mile West Somerset Mineral Railway was constructed to carry iron ore from mines in the Brendon Hills to Watchet harbour for shipment to Newport in South Wales. The incline, completed in 1868, was twin track gravity operated and with a gradient of 1 in 4, it was perhaps the most significant standard gauge incline in the country.
- 8.100 In 1883, when the mines closed and ore trains no longer ran, revenue from passenger and goods traffic was not enough to cover the cost of running services and maintaining the line, which closed in 1898.
- 8.101 In the early 1990s Exmoor National Park Authority purchased the railway's incline. It was scheduled as an Ancient Monument and a grant was secured from the Heritage Lottery Fund for the conservation of the harbour at Watchet outside the National Park, as well as the railway and mine sites both within and outside the National Park⁴⁰⁴.

⁴⁰⁴ Jones, M.H. (2011) The Brendon Hills Iron Mines and the West Somerset Mineral Line: A New Account. *Lightmoor Press*

Lynton and Barnstaple Railway

- 8.102 The construction of the 19 mile long Lynton and Barnstaple railway began in 1895 and opened in 1898. It was built as a narrow gauge to lower the cost of construction and to follow the natural contours of the countryside. However, in the face of increasing competition from road transport, the line closed in 1935. Most of the buildings and some of the bridges survived. The former railway line lies partly within Exmoor National Park and part outside the National Park in North Devon District.
- 8.103 In 1979 a group was formed to restore the railway which in 1998 became the Lynton and Barnstaple Railway Trust and in 2004 opened a one mile stretch of the original track from Woody Bay to Killington Lane to the public⁴⁰⁵. The Trust has an aspiration to extend the line beyond the former railway station in Lynton to terminate at a new station closer to the settlement. The Lynton and Lynmouth Neighbourhood Plan was brought into force in December 2013, and includes a policy for the reinstatement of the Lynton & Barnstaple Railway, including the provision of a new Lynton station and an effective link for passengers from the station to the centre of Lynton.

SAFEGUARDING LAND ALONG FORMER RAILWAYS

- 8.104 Policy RT-D13 seeks to safeguard land along the line of the West Somerset Mineral Line and the Lynton and Barnstaple Railway as continuous linear routes for their recreation and historic value, and their potential for sustainable modes of travel within Exmoor National Park. The safeguarded land is identified on the Policies Map. It excludes land within the footprint of residential dwellings in existence when the Plan was adopted. Partial deviation from the original route will only be considered to achieve a continuous linear route when this cannot be reasonably achieved on the original route. Proposals for a deviation of the route should reflect the character of the original route. Where a proposal for partial deviation of the safeguarded route is permitted and developed, in relation to the reinstatement of the Lynton & Barnstaple Railway, the agreed alternative route will be safeguarded as a replacement of the original route it substitutes. The National Park Authority will work with neighbouring authorities to ensure a consistent approach where lines cross administrative boundaries.

RT-D13 SAFEGUARDING LAND ALONG FORMER RAILWAYS

- 1. The land on the route of the former the Lynton and Barnstaple Railway and the West Somerset Mineral Line as shown on the Policies Map will be safeguarded as important heritage assets and protected from development that would prevent the reuse of the former railways for the expansion of the access network (RT-D12) or the reinstatement of the former Lynton and Barnstaple Railway (RT-S2).**
- 2. Partial deviation from the original railway route will only be considered where it can be demonstrated that a continuous linear route cannot be reasonably achieved, for the purposes of reinstating the railway, by using the original route. Where a partial deviation of the original route is permitted and developed, the agreed alternative route will be safeguarded as a replacement of the original route it substitutes.**

⁴⁰⁵ Lynton & Barnstaple Railway Trust Ltd (2015) Lynton and Barnstaple Railway

REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY

- 8.105 The former Lynton and Barnstaple Railway runs through open countryside within the National Park and is an important heritage asset; therefore proposals for reinstatement should therefore seek to replicate the original narrow gauge railway as far as possible, and in doing so, further National Park purposes.
- 8.106 To help protect the landscape character of the National Park and its setting, the National Park Authority and North Devon Council have a coordinated policy approach, which favours the re-use of the original buildings associated with the former railway both within and outside the National Park. This principle ensures that any reinstatement is historically accurate and avoids or minimises the requirement for new buildings. Where it can be demonstrated this is not possible, existing buildings in suitable proximity to the reinstatement may be considered (CE-S5 Principles for the Conversion or Structural Alteration of Existing Buildings). Consequently, any additional new development from the original historic former railway including diversions from the original route and any new buildings and infrastructure will only be considered where it can be demonstrated that, no alternative solutions would meet the need for the development in any other way, and it is essential for the operation of the reinstated former railway or is a restoration of a historic feature that complements the character of the former railway. Proposals for new dwellings associated with the reinstatement of the railway should accord with housing policies in Section 6 'Achieving a Thriving Community'.
- 8.107 The design of all aspects of a proposal should therefore reflect the historic character and appearance of the original railway and ensure that the proposed development is integrated in terms of its landscape setting. Landscaping should be incorporated as part of the proposal to conserve and enhance the National Park. This should have regard to the site and landscape character of the area and also the traditional features of the former railway; this may include trees, hedges, walls, railings, fences and surface treatments (CE-S1 Landscape Character, and CE-S6 Design and Sustainable Construction Principles). Detailed evidence should be provided with any application to demonstrate the need for any deviations from the original historic former railway route consistent with policy RT-D13 to ensure that the reinstated route will be safeguarded.
- 8.108 Sustainable construction methods are encouraged in the National Park however in the case of the reinstatement of a former railway, the priority will be the historical accuracy of the development. Sustainable construction methods should therefore be used, unless it compromises the historical character and appearance of the reinstated railway and associated infrastructure (CE-S6 Design and Sustainable Construction Principles).
- 8.109 The National Park Authority will work with Devon County Council as the Highways and Transport Authorities and transport providers to encourage sustainable transport for residents and visitors (AC-S1 Sustainable Transport). Any proposed development will need to ensure appropriate and safe access to the road network and should not cause unacceptable levels of traffic in terms of the physical capacity of the network including road safety interests and the environmental impacts of accommodating such requirements. The National Park Authority will expect any proposal to incorporate measures to enable safe access by transport other than the private car, such as walking, cycling or public transport, to minimise traffic generation and the need for parking. A travel plan will therefore be required to ensure the proposal delivers sustainable travel outcomes. Where necessary, a transport assessment, transport statement and air quality assessment may be required (AC-D1 Transport and Accessibility Requirements for Development, and AC-D2 Traffic and Road Safety Considerations for Development). Proposals should also accord with RT-D12 Access Land and Rights of Way, CE-S3 Biodiversity and Green Infrastructure and CE-D2 Green Infrastructure Provision.

- 8.110 Applicants will be expected to demonstrate to the National Park Authority's satisfaction that any highway infrastructure proposed as part of the development is essential to the proposal and that it will not lead to unacceptable impacts to road users or result in the severance of existing highway routes or public rights of way. In such cases, to ensure potential impacts would be acceptable in a National Park context, the proposed infrastructure (including crossings) should be of an appropriate scale and design, such as through the use of natural and traditional materials, to ensure that it will conserve and enhance the National Park (AC-S2 Transport Infrastructure).
- 8.111 There is a presumption against providing for permanent peak parking demand due to the impact on the natural and built environment in the National Park. Instead, there is a need to seek more sustainable solutions to the management of traffic (see paragraph 8.109 above) and the demand for parking. Car parking provision should therefore be consistent with policies AC-S3 Traffic Management and Parking and AC-D2 Parking Provision and Standards. To address higher levels of parking, which may arise for limited periods during the peak season and scheduled 'railway events', temporary overflow measures may be permitted to accommodate peak parking demand if it does not adversely affect the environment or character of the area in accordance with AC-D3 Temporary Parking.

RT-S2 REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY

- 1. Proposals for the reinstatement of the Lynton and Barnstaple Railway should be in accordance with the following criteria:**
 - a) the proposal should seek to reinstate and replicate the former narrow gauge railway including the line of the original route and the siting, design, appearance, and materials of the associated structures or buildings;**
 - b) any additional new development over and above the original historic former railway should provide demonstrable evidence that it is essential for the operation of the reinstated former railway or is a restoration of a historic feature and that there are no alternative solutions which would reasonably meet the need for the development in any other way;**
 - c) reinstatement proposals should:**
 - i) Seek to re-use the original buildings associated with the former railway.**
 - ii) Where it can be demonstrated that the re-use of the original buildings cannot be achieved, existing buildings in suitable proximity to the reinstatement proposal may be considered.**
 - iii) New buildings will only be considered where it can be demonstrated that there are no existing buildings suitable for re-use.**
 - d) new infrastructure, buildings and structures should complement the character of the original railway;**
 - e) the proposal should respond to landscape character and ensure landscaping is appropriate to the site and character of the area and having regard to traditional features of the former railway (CE-S1);**
 - f) sustainable construction methods should be used, unless they compromise the historical accuracy and appearance of the former railway;**
 - g) the proposal should accord with AC-D1 and provide a travel plan to incorporate measures to enable safe access by walking, cycling and public transport that will help to minimise traffic generation and the need for parking;**
 - h) parking provision should be in accordance with policies AC-S3 and AC-D2; and**
 - i) provision of temporary overflow parking to help address peak parking demand should accord with AC-D3.**

9. ACHIEVING ACCESSIBILITY FOR ALL

SUSTAINABLE TRANSPORT

Objective 13. *To improve the sustainability, resilience and self-sufficiency of the National Park's settlements by supporting the retention, provision of, and access to community services and facilities.*

Objective 18. *To support sustainable transport for residents and visitors by improving public and community transport services and opportunities for walking, cycling and horse riding including linkages across the National Park boundary.*

Objective 19. *To minimise the net emissions of carbon dioxide and other greenhouse gases into the atmosphere, and support measures which contribute to carbon neutrality in ways that both conserve and enhance the National Park.*

CONTEXT

- 9.1 Transport policies have an important role in facilitating sustainable development and minimising greenhouse gas emissions. Sustainable modes of transport are supported, however it is recognised that the rural nature of much of the National Park, and its dispersed population, means that the majority of people rely on the private car to access jobs, services and facilities⁴⁰⁶. The settlement strategy set out in GP3 (Spatial Strategy) recognises that new development should be focused in the named settlements to help maintain the future sustainability, self-sufficiency and resilience of these settlements, and should not lead to a severe increase in traffic. Accessibility to essential services can be difficult for those who do not have access to a private car, or regular public transport services. The National Park Authority will work with Somerset and Devon County Councils as the Transport Authorities and transport providers to support more sustainable travel choices⁴⁰⁷, including through the ongoing provision of public transport services, and to encourage demand-responsive community transport initiatives, particularly in those areas where regular public transport services are not available. Similarly, car-sharing clubs are another means of improving accessibility in a rural area, and can also be helpful in reducing the need for second cars in a household and therefore the burden of related costs.
- 9.2 As well as encouraging more sustainable modes of transport for the resident population and those who work in the National Park, the National Park Authority will also encourage visitors and tourists to use non-car modes of travel to the National Park, and to get around once here. The majority of visitors travel to Exmoor by car, and monitoring shows that during the summer months visitor traffic has a substantial impact on traffic levels within the National Park. As a consequence there is some congestion experienced during these peak periods. Exmoor has an excellent rights of way and access network, which provides opportunities for visitors to enjoy the National Park through walking, cycling, and horse-riding (Section 8 Achieving Enjoyment for All). In particular, encouragement will be given to alternative modes of travel, such as public and demand responsive transport, walking, cycling, and horse-riding, and by improving information provision to make it easier for visitors to travel without their car and generally help to improve air quality; this may arise as a result from enhanced green infrastructure provision (CE-S3 Biodiversity and Green Infrastructure).

⁴⁰⁶ DCLG (2012) National Planning Policy Framework (Paragraphs 29-30.) Department of Communities and Local Government

⁴⁰⁷ DEFRA (2010) English National Parks and the Broads UK Government Vision and Circular (Paragraph 83)

- 9.3 Transport is a significant contributor to greenhouse gas emissions (see Section 5 Responding to Climate Change) and consequently the policies in this Plan seek to reduce emissions where possible and support low carbon transport options such as electric vehicles and bicycles. These are becoming more widespread, and the National Park Authority will encourage the appropriate provision of electric charging points (at suitable standards of charging to reflect electric vehicle charging requirements) in new developments and at suitable locations across the National Park. Where possible and appropriate, these electric charging points should be powered by renewable energy sources, in accordance with CC-S5 (Low Carbon & Renewable Energy Development). There are also concerns over the future availability and cost of fuel, the policies set out below to encourage alternatives to the car or greater car sharing, will therefore not only help mitigate climate change emissions, but also potentially help secure more affordable means of transport in the National Park.
- 9.4 Information Communication Technology (ICT) is likely to have an increasingly important role in reducing the need to travel and supporting a low carbon future. Although not everyone will choose to use technology in the place of travel, more people are able to work from home, shop via the internet, or access information and services, particularly when they have access to faster broadband connections (AC-S4 Electricity and Communications Networks). The National Park Authority will encourage improved information provision to make it easier for residents and visitors to travel without a car.

AC-S1 SUSTAINABLE TRANSPORT

- 1. The National Park Authority will encourage sustainable modes of transport through working with highways and transport authorities, transport providers, local communities, and where appropriate, neighbouring authorities to encourage:**
 - a) Public transport provision, community based demand-responsive transport and car sharing.**
 - b) Provision for walking, cycling and horse-riding including cross-boundary linkages with neighbouring authorities (RT-D12).**
 - c) Low carbon travel.**

TRANSPORT INFRASTRUCTURE

- 9.5 Although road maintenance and improvement schemes within existing highway boundaries do not require planning permission, consultation arrangements exist with the Highway Authorities to enable the National Park Authority's views to be heard before schemes are implemented. Many of Exmoor's roads, bridges and fords are historic and attractive features in their own right. Hedgebanks and hedges, trees, fingerposts, traditional bus shelters and other roadside features also add to the character of Exmoor's road network. Unsympathetic highway maintenance or improvement works can result in the loss of character or cause damage to ecological or historic features.
- 9.6 The National Park Authority will encourage Highway Authorities to ensure that any maintenance or improvement works are carried out to the highest environmental standards and in keeping with local character. This includes minimising disturbance to local communities or wildlife, avoiding pollution of watercourses, loss of wildlife interest, impacts on local amenity, characteristic landscape or historic features, or visual impacts, and supporting environmental enhancements where possible. Opportunities for enhancement through provision of green infrastructure will also be encouraged in accordance with policy CE-D2 (Green Infrastructure Provision). Any potential impacts on the access network should be dealt with in accordance with RT-S1 (Recreation and Tourism) and RT-D12 (Access Land and Rights of Way).
- 9.7 Climate change adaptation measures will be required for existing roads and infrastructure, particularly in response to more extreme weather events. Surface water is already having an impact on the lifespan of road surfaces. The National Park Authority will work with Highways Authorities and partners to identify the areas of the transport network that are at greatest risk from the impact of climate change (including coastal change) and support measures that enhance its resilience. The choice of materials should maximise sustainable drainage and reduce run-off.
- 9.8 The National Park Authority will work with Highways Authorities, local communities and businesses to ensure that highway safety is not compromised, and avoid unnecessary highway signage and other forms of highway structures (including lighting – policy CE-S2), which would have an adverse impact on the landscape and street scene. Certain visitor attractions are eligible for advance signing using the Highway Agency's 'white on brown' tourism signs, which are paid for by the individual operator and are authorised by the Highway Authority. However, Exmoor National Park Authority should be consulted on individual proposals in the National Park. Signs, road markings, barriers and traffic signals should be kept to a minimum and comprehensive approaches to local signing and advertisement will be promoted where benefits to local character, amenity and highway safety can be achieved (CE-D5 Advertisements and Private Road Signs).
- 9.9 Upgrading of existing routes designed to accommodate higher traffic speeds would be resisted by the National Park Authority as inconsistent with the National Park purposes. Proposals for new roads or any significant road widening will only be considered where they are required for access to new development or enable substantial environmental gain or community benefit. Any new access roads would need to be proportionate to the scale of development and designed to the highest standards that are appropriate to the character of the local landscape and built environment. Trees, hedgerows and other planting schemes will be encouraged for landscaping and screening of new or improved roads and parking.

AC-S2 TRANSPORT INFRASTRUCTURE

- 1. Exmoor National Park Authority will work with highways authorities and local communities to ensure that works to highways and transport infrastructure including traditional fords and bridges, road maintenance and improvement schemes, parking or new access roads, signage and street furniture reflect local character and:**
 - a) Are designed and constructed to conserve and enhance the natural beauty of the National Park, using materials and finishes that are appropriate to the character of the local landscape and built environment.**
 - b) Maintain and, where possible, enhance the rural character of roads.**
 - c) Retain (or if this is not possible, replace like for like) existing traditional street furniture and highways signage such as fingerposts, milestones, cast iron signs or other features important to the character of the area.**
 - d) Incorporate wildlife enhancements and landscaping schemes including green infrastructure where appropriate.**
 - e) Minimise disturbance and damage during maintenance or construction.**
 - f) Minimise lighting (CE-S2), highways signage and reduce clutter.**
 - g) Take account of road safety interests particularly for non- motorised modes of transport, and the capacity and function of the road network.**
 - h) Increase future resilience of transport infrastructure at risk from climate change and extreme weather events through the use of sustainable drainage systems.**
 - i) Upgrading of existing routes designed solely to accommodate high traffic speeds will not be supported.**
 - j) New roads and significant road widening are not considered to be appropriate in the National Park context, except where they would result in substantial environmental gain or community benefit.**

TRANSPORT AND ACCESSIBILITY REQUIREMENTS FOR DEVELOPMENT

- 9.10** Applications should be located, designed and planned to avoid community severance and encourage a shift of priority towards pedestrians, cyclists, horse riders and public transport. They should seek to create environments that are attractive and that encourage travel by modes other than the car to jobs, services and the wider transport network. Opportunities to support low carbon travel, such as installation of electric charging points, will be encouraged, where these are in keeping with local character. Car share clubs will also be supported, particularly where this helps to reduce isolation for those who do not have access to a private car.
- 9.11** Development, including the change of use of buildings can lead to a requirement for road improvements and further maintenance. Conserving and enhancing the National Park and its special qualities and the safety of non-car users will be the primary criteria in the planning and design of transport and its management. Standard highway solutions are sometimes used as a development design starting point which can have the effect of discouraging the exploration of good design and local distinctiveness, which are particularly important attributes for development in Exmoor National Park. Solutions will be sought which incorporate and combine the principles of highway

safety with good design for the area, contributing to local distinctiveness. Opportunities for wildlife enhancement will also be encouraged.

- 9.12 Contributions may be required for transport enhancements (including measures set out in Travel Plans) to improve the safety, enjoyment and convenience of non-car modes of travel including (but not necessarily limited to) footpaths, bridleways, cycleways, car-sharing facilities, highways, public transport provision and infrastructure, charging points for electric vehicles, car parking, motorcycle and bicycle parking and travel planning (GP5 Securing Planning Benefits - Planning Obligations).
- 9.13 Whilst the majority of development proposals within the National Park are not likely to generate significant levels of traffic, such proposals may occasionally arise for example: a farm diversification scheme or new visitor facility. In such cases, proposals should be supported by a Transport Assessment (TA) or in less complex cases, a simplified Transport Statement⁴⁰⁸ which have been produced in consultation with the relevant authorities. This should assess the potential transport impacts of the proposed development and set out the measures that will be taken to deal with them, with emphasis on improving accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport. It should be produced in conjunction with a Travel Plan (TP) to ensure that the proposal delivers sustainable travel outcomes including through minimising the level of trips generated, demonstrating how additional trips will be accommodated, and how accessibility to the site by different modes of transport will be achieved. If necessary, a separate Air Quality Assessment may be required to consider in more detail impacts on air quality and any mitigation required. Reference should also be made to Design and Access Statements (see CE-S6 Design and Sustainable Construction Principles). These Assessments will be used to determine whether the impact of the development in transport terms is acceptable (including the impacts of traffic generated, greenhouse gas emissions, impacts on air quality, road safety, and the special qualities of the National Park).

AC-D1 TRANSPORT AND ACCESSIBILITY REQUIREMENTS FOR DEVELOPMENT

- 1. In designing new development applicants should:**
 - a) Demonstrate all opportunities have been taken advantage of to encourage safe and sustainable modes of transport including through improved infrastructure such as footpaths and cycle paths, rights of way improvements or linkages, cycle parking and storage, and electric charging points.**
 - b) Avoid community severance and ensure good access for pedestrians and cyclists from new development to nearby services and facilities including public transport links.**
 - c) Encourage the provision of car club and car sharing facilities where appropriate.**
 - d) Ensure that the design and details of highway works which are required for new development proposals are appropriate in scale to the development and contribute to the conservation or enhancement of the area.**
- 2. Where development is likely to generate significant levels of traffic, applicants will be required to prepare a Transport Assessment or Transport Statement, an Air Quality Assessment where necessary, and a Travel Plan to ensure that the proposal delivers sustainable travel outcomes.**

⁴⁰⁸ DCLG (2012) National Planning Policy Framework (Paragraph 32). Department of Communities and Local Government

TRAFFIC AND ROAD SAFETY CONSIDERATIONS FOR DEVELOPMENT

- 9.14 Any new development should be of an appropriate type and scale so that it can be safely serviced by the existing road network. The traffic likely to be generated by development proposals should not exceed the capacity of the local road network; cause unacceptable deterioration in air quality or the natural or built environment; or prejudice road safety interests. Where proposed development requires access onto the Exmoor Route Network (A and B roads) this must be capable of being provided in a safe and environmentally acceptable manner. Where necessary, schemes should be accompanied by an assessment of the traffic impact on the route, to the satisfaction of the Highway Authority.

AC-D2 TRAFFIC AND ROAD SAFETY CONSIDERATIONS FOR DEVELOPMENT

- 1. The Exmoor Route Network will be taken into consideration in the determination of proposals for development to ensure that the capacity of the roads serving the development is adequate for the traffic likely to be generated.**
- 2. Development which will cause unacceptable levels of traffic in terms of the environmental or physical capacity of the local road network, or would prejudice road safety interests, will not be permitted.**

TRAFFIC MANAGEMENT AND PARKING PROVISION

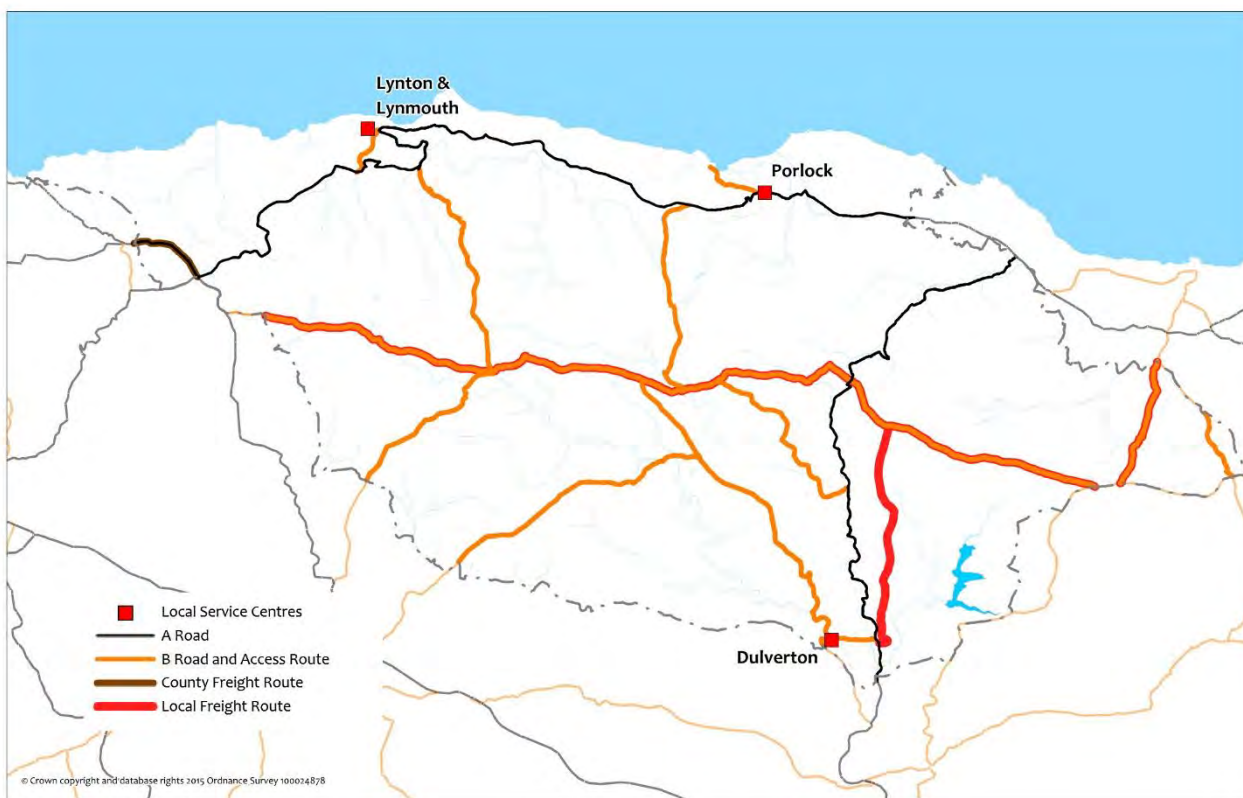
- 9.15 The National Park has no major strategic road or rail corridors. The two principal transport routes on Exmoor are the A39 and A396, which form the main routes for traffic, including visitor traffic during the tourism season. However, much of the travel on Exmoor (particularly the east-west routes) uses B roads and smaller rural lanes. These lanes, often framed by beech hedgerows, serving local farms and communities, form part of the character of the National Park and are important historic and landscape features in their own right. The responsibility for roads and traffic management lies with Devon and Somerset County Councils (as Highway Authorities), therefore the implementation of policies rely on a close working relationship with both authorities. The implications of development proposals in terms of potential traffic generation, road safety and the adequacy or otherwise of the local road network will be relevant factors in decisions.
- 9.16 Traffic flows on Exmoor are relatively stable, although levels increase significantly during the main summer months when greater numbers of visitors to the National Park. Although traffic pressures across the National Park as a whole are not severe there can be specific areas which face congestion issues and parking problems particularly during the busy holiday periods. The areas with the highest average daily traffic in the National Park where problems of congestion occur include Lynton/ Lynmouth, Dunster, Dulverton and Porlock as well as popular tourist destinations, such as Tarr Steps and Valley of the Rocks.
- 9.17 The effects of traffic are seen in the congestion of streets and over-demand for parking space in some towns and villages at peak periods. This can result in local impacts from air and noise pollution, a reduction in the quality of the experience of the National Park for residents and visitors, damage to the physical fabric of buildings and, in some cases, restrictions on the passage of buses and emergency vehicles. Conditions for pedestrians, cyclists, horse-riders and disabled people can be made difficult by traffic and inappropriate access by HGVs, which may contribute towards community severance and poor accessibility to local services including public transport. The National Park Authority will seek to ensure that the needs of more vulnerable road users such as walkers, cyclists and horse-riders are taken account of in traffic management.

- 9.18 In settlements, streets should be inclusive for all and attractive places in their own right rather than just corridors for traffic⁴⁰⁹ (see policy CE-S6 Design and Sustainable Construction Principles). Outside the named settlements there are concerns that high traffic speeds on narrow roads and lanes put other users such as walkers, horse riders and cyclists at risk. Where opportunities arise, the National Park Authority will encourage the provision of alternatives to busy roads that link up important footpaths and bridleways, safer crossing points, and other safety measures.
- 9.19 Some traditional bridges are showing signs of physical deterioration as they are carrying volumes and weights of vehicles greater than intended for its original use. The physical capacity of these roads and alignment is, in the main, unsuited to larger vehicles and heavy flows of traffic at higher speeds. It is important to ensure measures are adopted in partnership with relevant transport authorities to reduce the pressure on such bridges through promotion of the Exmoor Route Network and advisory routes, particularly for coaches and lorries.
- 9.20 The Exmoor Route Network shown on the Policies Map and Key Diagram (and Map 9.1 below), provides a hierarchy of routes for different types and modes of travel. The A class roads are the principal transport routes in the National Park, suitable for most types of traffic (with some exceptions relating to HGVs – see below); B class roads are suitable for medium sized vehicles; other smaller roads and lanes are only suitable for cars and other small vehicles.
- 9.21 HGV movements on roads within the National Park are at significantly lower levels in relation to total traffic flows but large vehicles can still cause problems on narrow roads and in villages across the National Park. There has been a significant increase in delivery vans, some of which is likely to have resulted from the growth in internet shopping⁴¹⁰. Whilst this is preferable in the National Park to additional HGV movements, such increases in traffic may in future benefit from co-ordination and shared deliveries using an appropriate size of vehicles suited to the small rural roads in the National Park
- 9.22 There are no long distance freight routes through the National Park, apart from a short section of A399 that passes through the western edge of the National Park which is identified as a County Freight Route. The A39 from Williton to Dunster and Minehead (outside the National Park boundary) is also designated a County Freight Route. Local Freight Routes, for local access only, are designated for the B3190 (Ralegh's Cross towards Washford Cross), the tertiary route from Machine Cross to Heathpoult Cross, and the east/west route across the National Park consisting of the B3224, B3223 and B3358. These are longstanding routes signposted for HGVs for local access only and not as strategic county level routes. The Exmoor Route Network provides the framework to ensure that freight traffic uses roads most suited to the purpose of its journey. The National Park Authority will support continued work by the Highways Authorities with hauliers and SatNav providers to encourage traffic, particularly lorries and HGVs, to use County Freight Routes to access the settlements on the edge of the National Park including Dunster, Minehead and Lynton/Lynmouth, with Local Freight Routes restricted to local access only. The National Park Authority will also encourage Highways Authorities to ensure that diversionary routes and planned maintenance minimise disruption to local communities. The use of unsuitable routes will be discouraged through appropriate measures, such as positive signing and SatNav route information.

⁴⁰⁹ Department of Transport (2007) Manual for Streets; Department of Transport (2010) Manual for Streets 2 - Wider Application of the Principles

⁴¹⁰ Somerset County Council (2011) Freight Strategy

Map 9.1 Exmoor Route Network



Exmoor Route Network

PARKING

- 9.23 Parking provision is an important factor for Exmoor's communities and local businesses due to the high dependency on the car. However, providing adequate parking provision to reflect this, has to be balanced with impacts on landscape, the limited overall capacity of land available for development the National Park, and the need to encourage people to adopt sustainable modes of travel wherever possible and help contribute to reducing greenhouse gas emissions. Parking provision for new development should be in accordance with Policy AC-D3 (Parking Provision and Standards).
- 9.24 Within settlements, public car parks help to reduce the level of on-street parking and outside the tourism season can provide a useful facility for residents. In some locations there may be scope for rationalising, relocating or redesigning existing parking where this would achieve environmental gains. Reserving small car parks specifically for residents and the provision of community car parks within villages may also be part of an overall solution to parking problems, particularly if they are associated with other community facilities such as open amenity space, the village hall or public toilets. Such provision should not however result in adverse impacts on the highway caused by visitors displaced from these car parks or on local businesses.
- 9.25 Exmoor is relatively well provided with parking facilities for countryside recreation. There is a presumption against providing for peak demand due to the impact on the natural and built environment, the seasonal and localised nature of congestion and the need to seek more sustainable solutions to the management of traffic and the demand for parking. The emphasis will be to maximise the use of existing parking facilities.
- 9.26 The creation of minor new car parking facilities will only be contemplated as replacement for existing car parking lost through development or coastal change; to relieve traffic and parking pressure elsewhere in the locality; or where opportunities for informal recreation or new public access are developed; and always subject to

conservation objectives. The design of parking should take into account environmental constraints (AC-S2) and make the best use of available land.

- 9.27 The National Park Authority will work with Highways Authorities and local communities to find the best solutions to congestion and parking issues. Given the limited capacity for additional car parking and potential impact on special qualities, the focus will be on providing for community needs rather than peak parking capacity. Temporary solutions will be sought for peak parking demands in areas where this is causing environmental damage or adversely affecting the quality of life of local communities, including temporary provision of park and ride to manage parking and traffic at major events (AC-D4).

AC-S3 TRAFFIC MANAGEMENT AND PARKING

- 1. The approach to traffic management on Exmoor will take into account the needs of all users including pedestrians, walkers, cyclists, horse-riders, and disabled people, including through the provision of alternative routes to avoid busy roads, safer crossing points, and use of shared surfaces where appropriate.**
- 2. The Exmoor Route Network, as shown on the policies map, will form the framework for traffic and freight management in the National Park.**
- 3. Replacement of existing car parking lost through development or coastal change, or the creation of small scale new facilities will be permitted where:**
 - a) this enables opportunities to enhance public understanding and enjoyment of the National Park; or**
 - b) this relieves traffic and parking pressure elsewhere in the locality; and**
 - c) there is good accessibility, and there would be no material harm to the character and appearance of the locality or views from publicly accessible locations; and**
 - d) it is well designed in accordance with the criteria set out in policy AC-S2(1)**
- 4. In the National Park there is a presumption against providing for peak parking demand. The National Park Authority will work with highways authorities, Town and Parish Councils and local communities to identify local solutions to congestion and parking issues in keeping with landscape character, providing for community needs and utilising temporary solutions for peak parking where necessary and appropriate (AC-D4).**
- 5. Proposals for new development should make adequate provision for parking in accordance with AC-D3.**

PARKING PROVISION AND STANDARDS

- 9.28 Policy AC-D3 guides parking provision in developments – the principle will be to minimise parking taking into account environmental constraints. Table 9.1 *Guide to Parking standards* lists optimum levels of provision and is intended to guide applicants regarding the levels of car, cycle, motorcycle parking and parking for disabled people⁴¹¹. The parking standards reflect the rural nature of the National Park, and that many people will be dependent on access to a car. Car parking standards include any

⁴¹¹ The parking standards in Table 9.1 are based on the Somerset County Council Parking Standards (Zone C), adapted to reflect the lower levels and sizes of development that are more typical in the National Park, and applied across the whole National Park.

garages or car ports provided. However, developments in more sustainable locations that are well served by public transport or have good walking and cycling links will be considered appropriate for lower levels of car parking provision. There may be circumstances such as change of use, or new development in restricted locations where it is not possible to accommodate parking. In order to enable otherwise appropriate development, the National Park Authority will take into account the proximity of public parking (including on-road parking) and public transport when considering applications. Applicants will be expected to provide clear evidence to justify higher car parking provision. Proposals for higher levels of cycle parking will be favourably considered.

- 9.29 As land capacity for development is limited in the National Park, the design of parking provision in developments should avoid 'land-hungry' approaches to car parking, promoting a design-led approach that is well integrated with a high quality public realm and streets that are pedestrian and cycle friendly⁴¹² (see CE-S6 Design and Sustainable Construction Principles). Car parking in the open countryside for tourism and recreation developments will be required to meet the highest standards of landscaping and screening to reduce visual impacts (AC-S2). The use of natural materials for surfacing will be preferred over hard surfaces such as tarmac.
- 9.30 The National Park Authority will encourage the provision of cycle parking to support walking and cycling both as a means of recreation but also to enable residents to access jobs, services and community facilities, such as village halls and sports facilities, particularly in the named settlements. Levels of cycle parking will be considered based on the standards set out in Table 9.1 or a case by case basis, according to the size and type of development and its location. Transport Assessments / Statements and Travel Plans should include consideration of cycling and the likely demand for cycling provision. In most circumstances, 'Sheffield' type cycle parking stands (a metal hoop sunk into concrete or bolted to the ground) will be adequate. All stands must be made of robust materials and fixed securely. At locations where stays are likely to be longer, for example at residential institutions, workplaces, schools or hotels, secure, undercover cycle storage facilities will be required. Shared cycle parking facilities can be more efficient and require less space than individual facilities⁴¹³. Cycle parking for residential developments will also be looked at on a case by case basis, with provision for cycle storage such as garden sheds included where appropriate. Motorcycling is also becoming more popular, and provision for motorcycle parking will also be encouraged on a case-by-case basis in accordance with Policy AC-D3.
- 9.31 Policy AC-D3 also makes provision for the specialist parking needs of certain parts of the community, such as those with disabilities. The design and dimensions for disabled parking bays should be in accordance with current Regulations⁴¹⁴ and allow for sufficient space for people with disabilities to transfer from vehicle to wheelchair. Bays can be combined with common 'transfer zones' to reduce space requirements. Bays should be level, and the surface of the accessibility zone should be firm, durable and slip resistant.

⁴¹² The Chartered Institution of Highways and Transportation (2012) Guidance Note on Residential Parking

⁴¹³ Department of Transport (2007) Manual for Streets

⁴¹⁴ HM Government (2015) The Building Regulations 2010: Approved Document M, *The Stationery Office, London*

AC-D3 PARKING PROVISION AND STANDARDS

1. Proposals will be permitted where they make appropriate provision for parking including for bicycles, motorcycles, disabled users and car sharing, guided by the standards set out in Table 9.1.
2. Parking provision should take into account environmental constraints, be well designed and integrated with a high quality environment.
3. Developments in more sustainable locations that are well served by public transport or have good walking and cycling links will be considered appropriate for lower levels of car parking provision or in appropriate cases, no car parking provision. Proposals for higher levels of cycle parking will be favourably considered.

Table 9.1: Schedule to Policy AC-D3 – Guide to Parking Standards

Use Class and Description	Car parking	Cycle parking
A1 Retail	Non-food: 1/50m ² Food: 1/16 m ²	1/100m ²
A2 Financial and Professional Services	1/30 m ²	Case b`y case basis
A3/A4/A5 Food and Drink	1/16m ²	1/20m ²
B1 Business	1/30 m ²	1/250m ²
B2 General Industrial	1/75 m ²	1/200m ²
B8 General Warehouses and Distribution	1 car space per 200m ² and 1 lorry space per 250 m ²	1/200m ²
C1 Hotels	1 per 2 bedrooms	1 space per 5 beds
C2 Residential Institutions	1/40m ² or 1 per 4 bedrooms	1/100m ² and 1/13 beds
C3 Residential	1 or 2 bedrooms = 2 spaces 3, 4 or 4+ bedrooms = 3 spaces	Case by case basis
D1 Non Residential Institutions	Health centres 1/25m ² Schools 1 /2 FTE staff + 2 visitor spaces Churches, halls, 1/20m ² HE/FE colleges 1/55m ²	Health centres 1/100m ² Schools 1 /10 FTE staff + 1/5 pupils HE/FE colleges 1/350m ² Churches, halls, libraries, museums – case by case basis Community centres – 1/100m ²
D2 Assembly and Leisure	2a cinemas 1/12 seats 2b exhibition centres 1/22m ² Leisure centres 1/40m ²	Case by case basis
Other development Bus and train stations	Case by case basis	1 per 20 passengers joining services in the station's peak hour
Disabled parking		
Car parks associated with employment premises, shopping areas, leisure or recreational facilities and places open to the general public	Case by case basis (with a minimum of one space per 20 car spaces for larger developments)	
Motorcycle parking		
All Use Classes	Case by case basis (with a minimum of one space per 20 car spaces for larger developments)	

- 9.32 Demand for parking can increase during the peak tourism season. There is a presumption against providing for permanent peak parking demand due to the impact on the natural and built environment in the National Park. Instead, the scale of car parking provision should be commensurate with the average daily usage annually. In order to address higher levels of parking which may arise for limited periods during peak season, temporary overflow measures may be permitted where current parking arrangements are causing an adverse impact on the environment and character of the area and/or the amenity of local communities.
- 9.33 The design of temporary measures should be in accordance with the temporary nature of the parking provision and the requirements for permanent parking (AC-S2 Transport Infrastructure). They should not have an adverse impact on the landscape, wildlife, character or amenity of the permanent use of the area. Any permanent change to the landscape character, design, surfacing or layout of the site will not be permitted, unless the site is brownfield and it can be demonstrated that the change will be an enhancement in accordance with Policy GP1 and accords with Policy CE-S6 (Design and Sustainable Construction Principles). However, it is likely that most temporary parking sites will be on greenfield land and any grassed surfaces will need to be retained and can be conserved by using reinforced mesh, which can help protect the vegetation and soil structure. The site should be returned to its original use, design and layout once the temporary parking use has ceased. Restoration measures may be required to mitigate any adverse impacts on wildlife which have resulted from the temporary usage. Any necessary boundary changes to the site will need to accord with this policy and will be of a temporary nature and be reverted to their original position once the temporary parking use has ceased.

AC-D4 TEMPORARY PARKING

Temporary overflow measures may be permitted to accommodate peak parking demand, where there is no adverse impact on the environment and character of the area, sensitive habitats and wildlife species and/or the amenity of local communities. The design of the proposal should be in accordance with the temporary nature of the parking provision with no permanent features or tracks, and meet the criteria for permanent parking set out in AC-S2 (1).

ELECTRICITY AND COMMUNICATIONS NETWORKS

Objective 17. *To achieve high quality telecommunications and essential utilities and infrastructure in ways commensurate with the conservation of the National Park's natural beauty, landscape wildlife, cultural heritage and special qualities.*

CONTEXT

9.34 Communications networks have a vital role in supporting sustainable economic growth and the provision of community services and facilities⁴¹⁵. The rapid change and expansion of electronic communications technology and its increasing influence on how society and businesses function, means that access to digital technology and associated improvement of telecommunications infrastructure, including in rural areas, is a national priority⁴¹⁶. The communications infrastructure in the National Park needs to be fit for purpose so that it remains a viable place for both businesses and communities to thrive, recognising that a more measured approach to the implementation of communications networks is required⁴¹⁷. All statutory undertakers, including utilities and telecoms companies, have a duty to have regard to National Park purposes under Section 62 of the Environment Act (1995).

FIXED LINE ELECTRICITY & TELECOMMUNICATION NETWORKS

9.35 The majority of properties on Exmoor are connected to the mains electricity network – however there remain a number of properties in more remote locations in the National Park that are not connected to mains electricity and are therefore reliant on generators and renewable energy technologies to meet their energy needs. The mains electricity network is delivered to homes and businesses on Exmoor via a local distribution network on wood pole lines (including 11kV and 33kV lines). Larger high voltage pylon routes and transmission lines would be treated as major development (GP2) and are not considered to be appropriate in the National Park due to the impact on landscape character and other special qualities.

9.36 The fixed-line telecommunications network (British Telecom infrastructure) provides the traditional fixed-line telephone service to the majority of households and businesses on Exmoor and also access to broadband for those households within a reasonable distance of an ADSL (asymmetric digital subscriber line) enabled telephone exchange. None of the telephone exchanges within the National Park have been upgraded to ADSL2+ to enable faster data transmission. In large, densely populated areas, the fixed-line copper cabling continues to be upgraded to fibre-optic to enable superfast broadband services direct to the home or to the nearest telecommunication cabinet. Although the cost of delivering this type of technology to rural homes is likely to be more expensive due to the dispersed and small scale nature of rural settlements, the cost may reduce (see section on Broadband Internet Access below).

9.37 Overhead electronic and telecommunication transmission lines and poles are often disruptive features that adversely impact landscape and seascape character. Consultation events showed that a majority of respondents considered that there were too many in the National Park. Correspondingly there was support for undergrounding utility cabling to new developments and communities have expressed support for undergrounding overhead cables within settlements⁴¹⁸. Undergrounding overhead telecommunication lines in sensitive landscapes is also desirable and will be sought

⁴¹⁵ DCLG (2012) National Planning Policy Framework (Paragraph 42). Department of Communities and Local Government

⁴¹⁶ Department of Business Innovation and Skills (2014) Broadband Delivery UK (BDUK)

⁴¹⁷ DEFRA (2010) English National Parks and the Broads UK Government Vision and Circular (Paragraph 80)

⁴¹⁸ ENPA (2010) Your Future Exmoor consultation events, *Exmoor National Park Authority, Dulverton*

where opportunities arise. Western Power Distribution is working within the protected landscapes (National Parks and Areas of Outstanding Natural Beauty) in its region to identify potential areas for undergrounding existing overhead lines⁴¹⁹. Within Exmoor National Park this has included programmes for undergrounding overhead lines in:

- a) Dulverton Conservation Area - to enhance the quality of the built heritage,
- b) Hawkcombe – to enhance the open character of the moorland landscape, and
- c) Porlock Marsh - to improve the character of the coastal landscape and seascape.

MOBILE PHONE NETWORK

- 9.38 The Mobile Cellular Communications Network (mobile phone) network also has an important social and economic function in today's society. The launch of the second generation (2G) digital transmission which introduced data services such as text messages, dramatically increased popularity of mobile phones and correspondingly the network coverage. In 2000 only half of UK adults had a mobile phone; by 2010 this had increased to 91%. With the introduction of 3G, progressively more people are accessing mobile broadband services via new electronic communication devices⁴²⁰. The launch of superfast mobile broadband networks (4G) in 2013 enables networks to have considerably greater capacity and speed.
- 9.39 On Exmoor the mobile telecommunications network consists of a number of base stations, which comprise generally of a range of structures including some form of mast or monopole, and is predominantly owned by one network operator Everything Everywhere (a merger between T-Mobile and Orange). However coverage is limited due to Exmoor's topography and low population density and some communities experience either poor or no access to the mobile network.
- 9.40 Another component of the communications network is the Airwave Network providing voice and data communications for essential public services, such as the police, fire and ambulance services. This secure network covers around 99% of the country and is not available for public use⁴²¹.

BROADBAND INTERNET ACCESS

- 9.41 Broadband internet access has become the 'fourth utility' for most of the UK's population. However there remains a broad divide between rural and urban areas in the quality and availability of this technology⁴²². Where broadband internet is available and users have access to appropriate technology, the delivery of key public services has been transformed and businesses have the advantage of faster electronic communication.
- 9.42 The vast majority of Exmoor is served by British Telecom (BT) infrastructure, with a number of small scale satellite operators providing alternative networks in some communities. In sparsely populated rural areas, such as Exmoor, areas known as 'not spots' and 'slow spots' exist where either there is no, or a very slow, broadband service due to the distance from the nearest telephone exchange.
- 9.43 The lack of access to high quality broadband in rural areas can have economic impacts on rural businesses, public service providers and communities. There is pressure on the farming community to have a high level of broadband connectivity due to the requirements from DEFRA to submit information online. Farms are rural and isolated and therefore very often, can be within areas where broadband delivery is constrained. Limited access to broadband can also have social and personal implications for people in rural areas⁴²³. Consultation highlighted that people were

⁴¹⁹ Western Power Distribution (2014) Report for Stakeholders 2013/14

⁴²⁰ Mobile Operators Association (2015) Mobile mast information

⁴²¹ Airwave (2015) Airwave's Network and Services

⁴²² Commission for Rural Communities (2008) Mind the Gap: Digital England – a rural perspective

⁴²³ Commission for Rural Communities (2011) Rural Broadband: Why does it matter?

overwhelmingly in favour of ensuring that all communities in the National Park have access to broadband technology and enhanced mobile phone coverage⁴²⁴.

9.44 The Devon and Somerset Local Broadband Plan will meet the government's Universal Service Commitment (USC) and the roll out of next generation access, to provide improved broadband to businesses and communities across Devon and Somerset⁴²⁵.

9.45 The roll out of improved and superfast broadband across Devon and Somerset will help to address the digital deprivation experienced in rural areas. Much of the demand in rural areas is driven by online shopping, banking and communication. Currently, the incidence of rural home working is as much as three times greater than for urban areas nationally and within the National Park almost a third of the working age population works at or from home⁴²⁶. The negative impacts of the digital divide are increasingly evident. However, existing telecommunications infrastructure has already benefited those rural areas with broadband access through: businesses relocating to rural areas from urban areas to enjoy a better quality of life; people moving out of cities on the basis they can work from home and access online services; and the potential for rural manufacturers and retailers to access worldwide markets⁴²⁷ (see AC-S1 Sustainable Transport). Improving and adapting this infrastructure can ensure that the social and economic benefits of accessing digital technology are available across the National Park.

9.46 It is likely that a mix of technologies will have a role to play in providing the USC for improved and superfast broadband in remote rural areas. Where geographic densities (premises per square kilometre) are low the most cost-effective solutions are expected to be fixed wireless or satellite technologies. Mobile broadband coverage is also likely to be part of the solution to complement fixed network infrastructure in rural areas⁴²⁸ (see AC-D5 Radio and Mobile Telecommunications Infrastructure).

INFRASTRUCTURE CONSIDERATIONS

9.47 Nationally significant infrastructure proposals will be determined by the Infrastructure Planning Unit within the Planning Inspectorate. A suite of national policy statements have been published to guide this process and substantial weight is given to ensuring the continued protection of National Parks⁴²⁹.

9.48 Proposals for new telecommunications development should be supported by evidence to justify the development including consultation with other organisations, other possible siting opportunities (such as mast sharing, using existing buildings or structures), and certification that the development will not exceed non-ionising radiation protection guidelines. The number of radio and telecommunication sites and masts should be kept to the minimum required for the efficient operation of the network, and any new sites should be sympathetically designed and camouflaged where appropriate. The National Park Authority encourages utility operators and network distributors (including broadband roll out) to enter into pre-application discussions relating to future proposals and the consideration of sharing infrastructure, technological advances and solutions, landscaping and design issues⁴³⁰.

9.49 A condition will be attached to any permission to ensure that where communications infrastructure becomes redundant it will be removed from the site and the land

⁴²⁴ ENPA (2010) Your Future Exmoor consultation events. *Exmoor National Park Authority, Dulverton*

⁴²⁵ Connecting Devon and Somerset (2012) Superfast Broadband Public Consultation

⁴²⁶ Office for National Statistics (2003) Census 2001: Key Statistics for Local Authorities. London: *The Stationery Office* – 31.35% of people aged 16 – 74 in employment who work mainly at or from home within Exmoor National Park

⁴²⁷ Commission for Rural Communities (2008) *Mind the Gap: Digital England – a rural perspective*

⁴²⁸ Broadband Delivery UK Theoretical Exercise: Conclusions and lessons learned (December 2010)

⁴²⁹ Department of Energy & Climate Change (2011) *Overarching National Policy Statement for Energy*

⁴³⁰ Mobile Operators Association (2004) *Joint Accord – Association of National Park Authorities, the Association for Areas of Outstanding Natural Beauty*

reinstated to achieve environmental enhancement, unless an alternative use for the site has been agreed by the Authority.

AC-S4 ELECTRICITY AND COMMUNICATIONS NETWORKS

- 1. Development to improve the accessibility and standard of the electricity and telecommunications networks will be encouraged in order to contribute to thriving communities and businesses, and climate change mitigation. Great weight will be given to ensuring that the National Park and its special qualities are conserved and enhanced.**
- 2. Proposals will be supported where:**
 - a) the location, siting, scale and design of structures will not cause any unacceptable adverse impacts on the landscape and/or seascape character, visual amenity, biodiversity and cultural heritage of the National Park;**
 - b) co-operative working with partner organisations and utility operators has been demonstrated, to facilitate the sharing, utilisation and consolidation of existing communications infrastructure in rolling out new or improved communication technologies; and**
 - c) provision is made for the removal of apparatus and reinstatement of land when the apparatus becomes redundant.**
- 3. Major and nationally significant transmission infrastructure including high voltage pylon transmission lines, substations and other above ground structures from large scale offshore renewable energy schemes will be resisted (GP2 Major Development).**

RADIO AND MOBILE TELECOMMUNICATION MASTS

- 9.50 The Mobile Operator's Association (MOA) represents the largest mobile network operators and has introduced ten commitments to best siting practice including improved consultation with communities, pre-application discussion with planning officers and agreement on site sharing⁴³¹. National Parks England⁴³² hold a joint accord with the Mobile Operators Association "*developed to complement the Code of Best Practice on Mobile Phone Network Development*⁴³³, recognising the special nature of the National Parks as sensitive environments that seek to support thriving communities".
- 9.51 The natural beauty of the National Park means that many locations are particularly sensitive to mobile communications development due to the visual intrusion of the mast or monopole structure and its impact on landscape character. Such structures appear as incongruous in the landscape due to their utilitarian appearance, vertical prominence and strong contrast to rural surroundings. The location and design (including form, overall height, colour, siting and setting) of telecommunication masts and the ancillary equipment associated with a radio base station are therefore particularly significant to ensure that the development does not conflict with the National Park designation, and does not adversely affect sensitive habitats and wildlife. The National Park Authority will work with mobile operators to seek positive solutions to enable the roll out of mobile technology across Exmoor in a way compatible with the National Park designation.

⁴³¹ Mobile Operators Association (2015) Mobile mast information

⁴³² NPE & MOA (2014) National Parks England and Mobile Operators Association Joint Accord

⁴³³ MOA et al (2013) Code of Best Practice on Mobile Network Development in England, *Mobile Operators Association, London*

9.52 In order to conserve and enhance the National Park, the optimal environmental solution will be sought including requiring the sharing of existing infrastructure, consolidation and enhancement of existing sites, siting on existing structures/features, or the use of 'stealth designs' (where masts are disguised as trees or concealed in other ways). Proposals should be guided by the Code of Best Practice 2013⁴³⁴ and the updated Joint Accord between National Parks England and MOA⁴³⁵ or equivalent updates. As with other vertical structures, such as wind turbines (CC-D3), the visual impact of telecommunication masts, i.e. when disguised as other structures, such as trees, should be minimised by avoiding breaking the skyline from public viewpoints including roads, public rights of way and access land. Other factors concerning siting may involve the site in relation to: a) Areas designated for their conservation value (CE-S3); b) Buildings including those of a historical or traditional character (CE-S4); c) Residential property.

AC-D5 RADIO AND MOBILE TELECOMMUNICATIONS INFRASTRUCTURE

- 1. Proposals for radio and mobile telecommunications development will be permitted where they first seek to share existing infrastructure, there is capacity in landscape terms, and no increase in height of existing masts is required.**
- 2. Where it can be demonstrated that (1) is not possible, apparatus will be sited on existing masts or other features such as buildings or other structures, to minimise adverse effects on landscape character.**
- 3. Where it can be demonstrated that (1) and (2) are not possible, the apparatus shall be sited and designed to ensure that it has an acceptable appearance in the landscape including through camouflage as a natural or traditional feature.**
- 4. In determining all proposals:**
 - a) the highest standards of design will be sought in terms of colour, dimensions, construction and overall shape to minimise any visual impact;**
 - b) there will be no unacceptable cumulative or sequential visual impact with other vertical structures in the landscape;**
 - c) there will be no adverse effects on sensitive habitats and wildlife;**
 - d) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building;**
 - e) the amenity of nearby residents and visitors are not adversely affected; and**
 - f) opportunities for enhancement of the landscape including consolidation of any existing telecommunications infrastructure will be sought.**
- 5. A condition will be attached to any planning consent to ensure that there will be ongoing management in place where trees are essential in providing amelioration to visual impacts including as camouflage to antenna within trees.**

⁴³⁴ Mobile Operators Association (2013) Code of Best Practice on Mobile Network Development in England

⁴³⁵ NPE & MOA (2014) National Parks England and Mobile Operators Association Joint Accord

FIXED LINE TRANSMISSION INFRASTRUCTURE

- 9.53 In terms of electronic communications apparatus, the Electronic Communications Code⁴³⁶ ensures that code operators should notify the National Park Authority, as the planning authority, of any intention to install electronic communications apparatus. This does not include service lines or replacement lines or poles. However, the Growth and Infrastructure Act 2013 adds to the list of considerations to which the Government must have regard in making regulations on the application of the Electronic Communications Code, to include ‘the need to promote economic growth’. As such the making of the regulations deems that any duties relating to the National Parks in England and Wales⁴³⁷ have been complied with until 6th April 2018 to promote the roll out of superfast broadband across the country. It is therefore recognised that the ability of the policies in this Plan to influence infrastructure development will be limited during this period and will effectively be governed by primary and secondary legislation⁴³⁸ and a Code of Practice relating to the Electronic Communications Code for fixed line code operators⁴³⁹.
- 9.54 Development consent is needed from the Department of Energy and Climate Change for all but the most minor lines in England and Wales. However, certain exemptions for the installation or replacement of ‘minor’ overhead electric lines do not apply within National Parks and notice is required to be given to the National Park Authority of the proposal to consider whether there would likely to be a significant adverse effect on the environment⁴⁴⁰.
- 9.55 Overhead electricity⁴⁴¹ and telecommunication lines have considerable visual impact particularly in rural landscapes – by creating visual clutter and appearing incongruous in the landscape. New electricity or telecommunications cabling, including service lines to new development and cabling from renewable energy technologies will be expected to be underground.

BROADBAND ROLL OUT

- 9.56 The National Park Authority supports the roll out of superfast broadband, which is important for the future prosperity of rural communities, and can mitigate the effects of climate change through reducing the need to travel. Sharing existing infrastructure has the potential to minimise adverse landscape impacts in the National Park. The first consideration in terms of future broadband deployment should establish whether or not the roll out can be achieved through the sharing and/or upgrading of existing infrastructure such as BT’s telecommunications infrastructure; other telecommunications infrastructure including mobile phone masts; and other utilities infrastructure before other solutions are considered (AC-D5 Radio and Mobile Telecommunications Infrastructure).

⁴³⁶ The Code was enacted to regulate landline telephone provision – it applies to infrastructure forming networks which support broadband, mobile internet and telephone, cable television and landlines. The code will be updated with regard to the Growth and Infrastructure Act.

⁴³⁷ HM Government (1949) The National Parks and Access to the Countryside Act 1949 – Section 11A Duty of certain bodies and persons to have regard to the purposes for which National Parks are designated (including statutory undertakers).

⁴³⁸ HM Government (2015) Town and Country Planning (General Permitted Development) (England) Order 2015 (Part 24 of Schedule 2). *The Stationery Office, London*.

⁴³⁹ Department for Culture, Media and Sport (2013) Cabinet Siting and Pole Siting Code of Practice

⁴⁴⁰ HM Government (2009) Statutory Instrument 2009 No.640- Electricity – The Overhead Lines (Exemption)(England and Wales) Regulations 2009, *The Stationery Office, London*

⁴⁴¹ HM Government (1989) Electricity Act 1989

OVERHEAD CABLING CONSIDERATIONS

- 9.57 Where it can be demonstrated that the need for the cabling (electricity and telecommunication cabling/lines) is essential in the National Park and cannot be addressed in another way, and that the cabling cannot be undergrounded because of other adverse impacts which cannot be mitigated (consistent with policies CE-S1 Landscape Character, CE-S3 Biodiversity and Green Infrastructure, and CE-S4 Cultural Heritage and Historic Environment) the National Park Authority will negotiate with the distribution network operator to select the least obtrusive route. The route should select a backdrop that makes sympathetic use of existing features such as hedgerows or wooded areas to break views of the line⁴⁴² and particularly avoid highly sensitive open landscapes, such as moorland, and skyline intrusion.
- 9.58 There are no high voltage overhead transmission lines in the National Park (i.e. the National Grid) and any proposals for such infrastructure that may come forward in the future will be strongly resisted. The Holford Rules are guidelines on overhead line routing first drawn up in 1959 and remain valuable guidance for selecting and assessing potential routes. The first rule in particular seeks to avoid major areas of highest amenity value – such as National Parks.

GRID CONNECTIONS TO OFFSHORE RENEWABLE ENERGY SCHEMES

- 9.59 Grid connections and substation infrastructure through landfall (the area associated with joining the offshore and onshore cabling) from nationally significant off-shore renewable energy schemes⁴⁴³ will also be resisted as the installation of such major infrastructure would cause unacceptable damage to the sensitive landscape, seascape, natural environment and cultural heritage of the National Park. It is considered that the probability of such proposals along the Exmoor coast is low due to the high status of protection given to National Parks, as well as topographical constraints and the inability to connect to the National Grid transmission network.
- 9.60 Exmoor National Park has had positive experience of small scale marine renewable energy installations and associated landfall (such as the single experimental marine turbine that was installed off the coast from Lynmouth); this technology contributes towards climate change mitigation and aspirations to become a carbon neutral National Park. Such small scale renewable energy technology is likely to be significantly less harmful in terms of the impacts on seascape (CE-S1), biodiversity (CE-S3) and cultural heritage (CE-S4). Proposals for small-scale/experimental marine energy technologies will be supported where the proposal is such that there is sufficient capacity within the existing electricity infrastructure or minimal upgrading of existing infrastructure is required. In these circumstances it should be demonstrated that the development is carried out to the highest environmental standards and any potential impacts, including within areas at risk of coastal change and flooding (CC-S1, CC-D1, and CC-S2), can be avoided or mitigated. Proposals seeking the replacement of existing electricity or telecommunication infrastructure in areas at risk of coastal change and/or flooding should comply with policies CC-D1 and CC-S2.

⁴⁴² National Grid Company (1990) Holford Rules

⁴⁴³ DECC (2011) Overarching National Policy Statement for Energy

AC-D6 FIXED LINE TRANSMISSION INFRASTRUCTURE

- 1. Proposals for new transmission lines will only be permitted where they are routed underground, unless they will conflict with policies CE-S1 Landscape Character, CE-S3 Biodiversity and Green Infrastructure, CE-S4 Cultural Heritage and Historic Environment and the need for the service cannot be met in any other way. In this circumstance, proposals for overhead lines may only be permitted where the visual impact is minimised by selecting the least obtrusive route and where it will not cross any moorland or open landscapes, or break the skyline.**
- 2. Proposals relating to low voltage electrical cabling from renewable energy technologies (CC-S5) will only be permitted where:**
 - a) they will be routed underground;**
 - b) they will not adversely affect landscape and seascape character, biodiversity, cultural heritage or recreational use of the coast; and**
 - c) there is adequate infrastructure to connect cabling nearby that does not require substantial modification or upgrading, or where any modification /upgrading to existing infrastructure is minimal and will not have any unacceptable impact.**
- 3. Development proposals that include electricity or telecommunication service lines to new development will be expected to provide underground routing subject to policies CE-S1, CE-S3 and CE-S4.**

SATELLITE ANTENNAE

- 9.61 A significant number of satellite antennae have been installed on traditional buildings throughout the National Park, and their continuing proliferation to access digital TV and more recently satellite broadband, is a cause for concern. It is recognised that some remoter broadband ‘not spots’ and ‘slow spots’ may require either fixed wireless or satellite broadband solutions for the short to medium term, until the upgrading of existing landlines to fibre-optic broadband and/or 4G mobile broadband is achieved. The optimal solution will be based on the local topography and clustering of properties.
- 9.62 There are restrictions on the number and size of antennae which may be installed on buildings as permitted development; and in the National Park antennae also cannot be installed on a chimney, wall or roof slope which faces onto and is visible from a road without planning consent⁴⁴⁴. The installation of antennae on a listed building will also require listed building consent. Where planning permission is required, the National Park Authority will seek to ensure that antennae are attached to the least obtrusive part of the building possible and are of the most appropriate design and size available (AC-D7 Satellite Antennae). Property owners intending to install antennae under permitted development rights will be encouraged to do likewise.

⁴⁴⁴ HM Government (2015) Town and Country Planning (General Permitted Development) (England) Order 2015. *The Stationery Office, London.*

FIXED WIRELESS ACCESS

9.63 Many fixed wireless access (FWA) broadband solutions may be considered as *de minimis* i.e. development not requiring planning consent – as most connections to premises will consist of a small micro wireless cell or antenna on the exterior of a building. These require line of sight to a community access point or base station which is slightly larger and likely to be similar in scale to a conventional TV aerial/satellite antenna. The scale of new technology and the speed it is being developed means that future FWA technologies are likely to be less obtrusive. The National Park Authority encourages early discussions to provide guidance on whether or not proposals are likely to require planning permission and to discuss options to minimise impacts on the National Park. Where planning permission may be required for FWA transmitter structures, then the principles set out in AC-S4 and those relating to satellite antennae (AC-D7) or telecommunications structures (AC-D5) will apply, depending on scale.

AC-D7 SATELLITE ANTENNAE

- 1. The installation of satellite antennae or wireless broadband equipment will be permitted where they are sited unobtrusively and are of a scale and design which will not cause unacceptable harm, either individually or cumulatively, to the historic or architectural interest of traditional buildings, the street scene, or overall landscape or settlement character.**
- 2. Installations that reduce the unacceptable harm caused by the cumulative visual impact of individual technologies will be favourably considered in relation to the tests above.**

10. EXMOOR'S SETTLEMENTS

Objective 11. *To enable Exmoor's communities and partnerships to plan development in their neighbourhoods to help meet their needs and aspirations while conserving the special qualities of the National Park.*

- 10.1 This section of the Local Plan sets out information that applies to defined settlements within the National Park (GP3 Spatial Strategy). For each settlement there is an inset map⁴⁴⁵ to the Policies Map and written statement. The written statement outlines the key aspects of each settlement in relation to its setting, built environment and local services. Where they have been prepared, parish and other community-led plans have also been taken into account.
- 10.2 The inset maps associated with each settlement identify particular areas or features that are important for social or environmental reasons, which are needed to interpret and apply Local Plan policies at a settlement level including areas at risk of flooding, wildlife designations, Conservation Areas, and in some cases land safeguarded for community services or facilities. The settlements are arranged in alphabetical order.

SUPPORTING LOCAL COMMUNITIES

CONTEXT

- 10.3 Policy ES-S1 positively supports local communities that wish to progress community-led initiatives through advice and support provided by the National Park Authority and other relevant partners and organisations to help identify and plan for their priorities that will help to sustain and enhance Exmoor's settlements in the longer term.
- 10.4 Local Plans are key to delivering sustainable development that reflects the vision and aspirations of local communities and also provides a framework to enable local people to produce their own distinctive plans for their neighbourhood or parish area.
- 10.5 Core planning principles include empowering local people to shape their surroundings with succinct local and neighbourhood plans and supporting community-led initiatives for renewable and low carbon energy⁴⁴⁶.
- 10.6 The National Parks' Circular⁴⁴⁷ vision particularly identifies the communities of the National Parks taking an active part in decisions about their future in terms of transforming to a low carbon society and sustainable living. Progress towards achieving the vision can be made through National Park Authorities and key partners together fostering and maintaining vibrant, healthy and productive living and working communities. Resident communities are acknowledged as having the awareness of the special value of their own locality and should be encouraged to take an increasingly active role in decision making.
- 10.7 The 21 'Your Future Exmoor' (YFE) consultation events⁴⁴⁸ held in towns and villages across Exmoor gave communities the opportunity to raise issues in relation to their parish and settlement and to particularly highlight what they valued. Some common issues raised by communities through the YFE events included the importance of local services, reducing unnecessary signage and light pollution, provision of affordable housing for local communities, and the lack of mobile phone and broadband coverage. Where these more general issues relate to development and land use, they are

⁴⁴⁵The inset maps for each settlement will form part of the Exmoor National Park Policies Map (A2 and A3 inset maps are found at the end of the Plan).

⁴⁴⁶ DCLG (2012) National Planning Policy Framework (paragraph 17). Department of Communities and Local Government

⁴⁴⁷ DEFRA (2010) English National Parks and the Broads UK Government Vision and Circular

⁴⁴⁸ ENPA (2010) Your Future Exmoor consultation events, *Exmoor National Park Authority, Dulverton*

addressed through relevant policies in the Local Plan and actions set out in the Partnership Plan.

















- 10.8 It is recognised that the issues raised at the 'YFE' events are derived from the time these consultations took place and that subsequent community projects and priorities could arise during the lifetime of the Local Plan. Communities may wish to address such issues, through a project, parish plan or the preparation of a planning document.
- 10.9 The Partnership Plan⁴⁴⁹ includes a strategic activity under Priority C1, for partners “*to support and work with Exmoor’s communities to plan for and achieve their aspirations*”. Therefore, proposals for projects or plans that communities would like to progress can be addressed through the Partnership Plan. This is a practical and positive means of identifying and progressing community aspirations that can be revised as new projects/plans come forward, and enable progress with existing projects to be monitored.
- 10.10 Support and advice may include working with communities to help bring forward development that accords with the policies set out in the Local Plan. Suitable tools could include parish plans, supplementary planning documents (SPDs) or Area Action Plans for larger projects. The Authority also has a duty to support Neighbourhood Planning including the preparation of Neighbourhood Plans to address specific issues within a community including neighbourhood development plans, neighbourhood development orders, and community right to build. The Authority will provide advice to communities, including whether a strategic environment assessment or habitat regulations assessment will be required in the preparation of such plans.













ES-S1 SUPPORTING LOCAL COMMUNITIES

Where parish and town councils and local communities have identified priorities and plans for the development they need to sustain their settlements over the longer term, the National Park Authority will provide advice and support to help achieve these aims where they are consistent with the Local Plan.





⁴⁴⁹ ENPA (2012) Exmoor National Park Partnership Plan 2012-2017, *Exmoor National Park Authority, Dulverton*

Inset Map Legend

-  Site of Special Scientific Interest
-  Special Areas of Conservation - Exmoor Heaths
-  Special Area of Conservation - Exmoor & Quantock Oak Woodlands
-  Local Wildlife Site
-  Regionally Important Geological Site
-  Regionally Important Geological Site
-  Section 3 - Cliff and Foreshore
-  Section 3 - Woodland
-  Section 3 - Moor and Heath
-  Tree Preservation Order - Woodland
-  Tree Preservation Order - Tree
-  Veteran Tree
-  Orchard of Landscape Importance
-  Groundwater Source Protection Zones
-  Historic Parks and Gardens
-  Listed Buildings

-  Scheduled Monuments
-  Conservation Area
-  Historic Settlement Core
-  Important Open Space - Recreation
-  Important Visual Amenity Space
-  Community Safeguarding Areas
-  Heritage coast
-  Coastal Change Management Area
-  Flood Zones - 2 and 3 Combined
-  Water Bodies
-  Route of the Lynton to Barnstaple railway (dismantled)
-  Route of the West Somerset Mineral Line (dismantled)

Exmoor Route Network

-  A Roads
-  B road and Access route
-  County Freight route
-  Local Freight route

DISCLAIMER

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

SETTING

- 10.11 The settlement of Barbrook is within the parish of Lynton and Lynmouth. The village lies on the junction of the B3234 and the A39 approximately 1 mile south from the larger settlement Lynton & Lynmouth. The character and form of the village are influenced by its valley setting. Additionally, the main roads that pass through Barbrook and the level of traffic, particularly during the peak holiday season, has an impact.
- 10.12 Barbrook has an impressive landscape setting within densely wooded valleys that form a backdrop to the village. Some areas of the surrounding woodlands are protected by tree preservation orders (TPOs), or are local wildlife sites or identified as woodland whose natural beauty is particularly important to conserve (Section 3 woodland⁴⁵⁰). Land to the north side of Dean Steep is a Site of Special Scientific Interest (SSSI) that was notified due to its geological significance that includes the former quarry area.



Cherrybridge at Barbrook

BUILT ENVIRONMENT

- 10.13 There are a number of small traditional cottages grouped around the A39 and West Lyn River. The settlement has expanded along the A39 towards Dean Steep and the B3234 towards Lynton due to a considerable level of post-war development continuing to the 1980s. Some of this post-war development replaced buildings lost during the 1952 flood disaster.

LOCAL SERVICES

- 10.14 Although the Post Office closed through the 2008 closures, there is a petrol filling station and convenience shop at Cherry Bridge in the centre of the village. The petrol

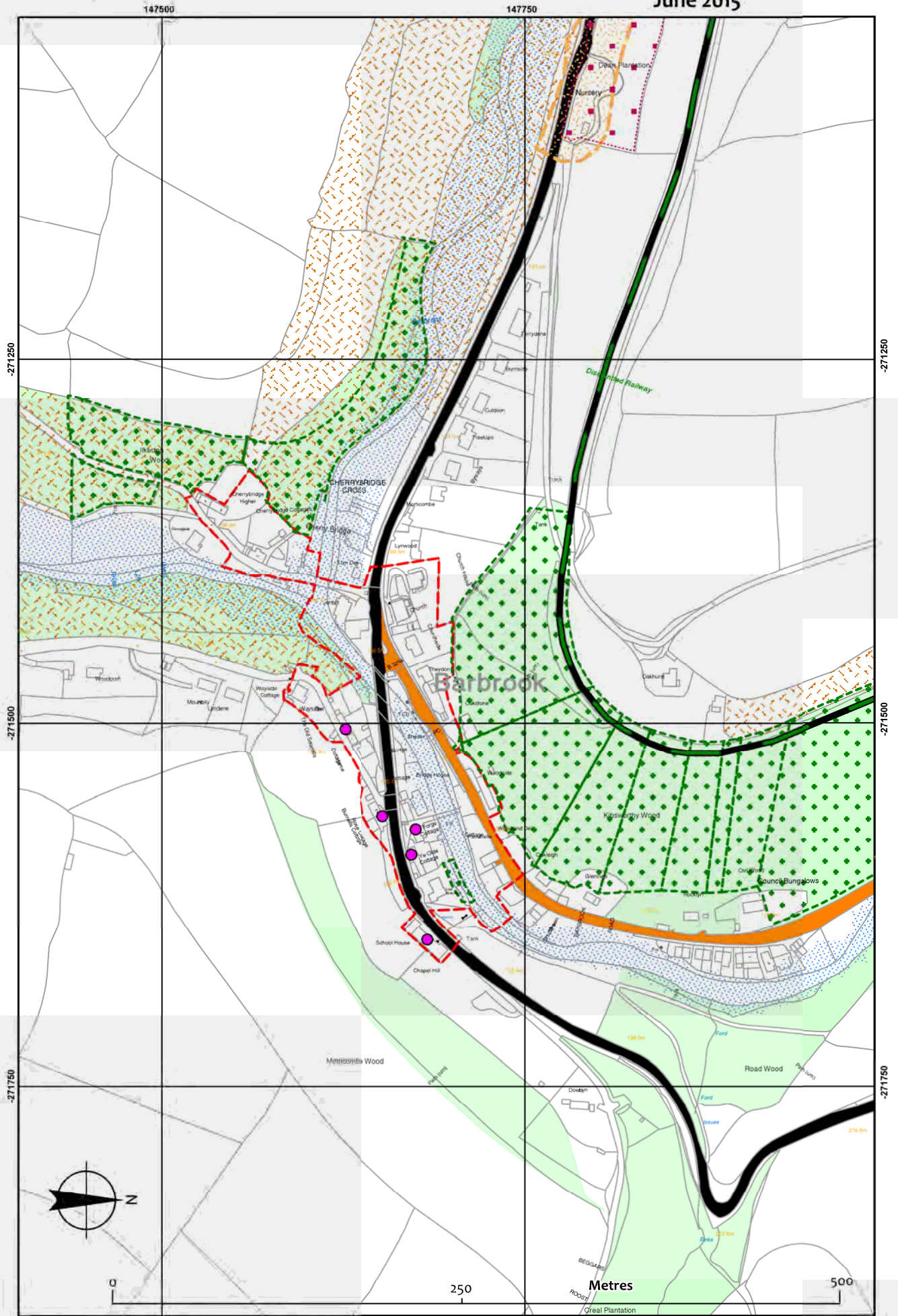
⁴⁵⁰HM Government (1985) Wildlife and Countryside (Amendment) Act 1985(Section 3 Maps of National Parks). *The Stationery Office, London* (Section 3 Maps of National Parks)

station is the closest such facility for some distance and is an important local service for the wider community as well as for visitors to the National Park. There is also a plant nursery on the edge of the village.

- 10.15 The village has access to public transport via the year-round, daily bus service from Lynton & Lynmouth to Barnstaple. Barbrook also benefits from the Ilfracombe Ring & Ride community car scheme.

LYNTON & LYNMOUTH NEIGHBOURHOOD PLAN

- 10.16 Barbrook is within the Lynton and Lynmouth neighbourhood plan area, with the support of others partners, were successful in their bid to become one of the first areas to trial Neighbourhood Planning. This process enabled the Town Council and wider community to build on previous engagement with the local community on both strategy and detail for the development needed for the long term sustainable future of the parish (see Policy ES-S2 Lynton & Lynmouth Neighbourhood Plan). The neighbourhood plan was brought into force as part of the development plan for the area in December 2013.



SETTING

- 10.17 Brendon is a small village situated in the East Lyn valley, some four miles east of Lynton & Lynmouth, within the North Devon area of the National Park. The village is immediately surrounded by permanent pasture, but set within landscape of a high coastal woodland combes. Brendon is accessed via a number of minor roads leading off the A39 and B3223.
- 10.18 Due to its riverside setting, a considerable area of the village is within an area at risk of flooding, including local amenities. Mill Wood to the west of the village is part of the Exmoor and Quantocks Oakwoods Special Area of Conservation, an internationally designated habitat. Potentially there are recreational and air quality impacts on lichens and bryophytes.



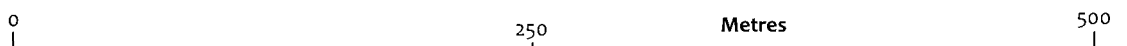
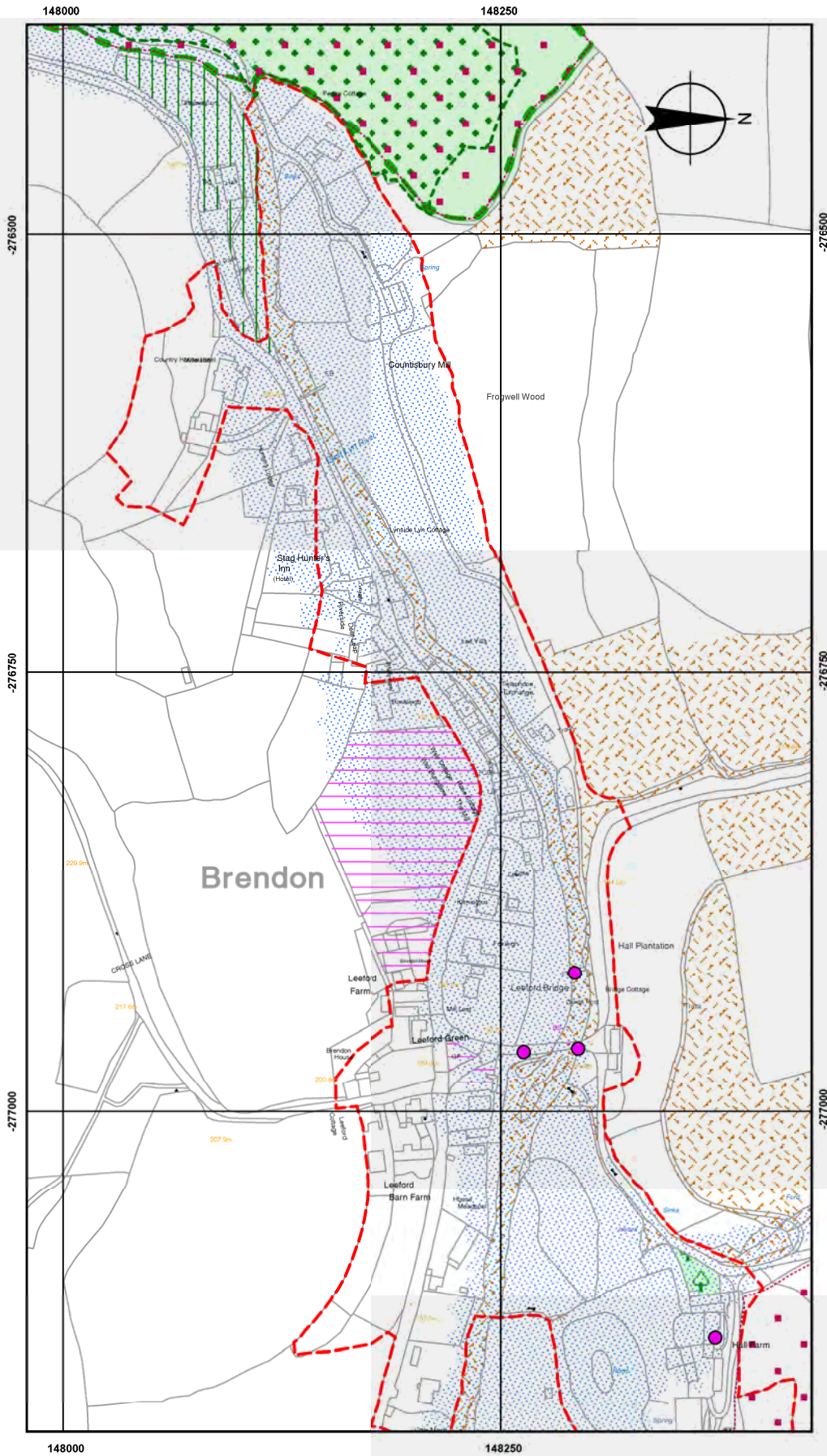
Cottages in Brendon

BUILT ENVIRONMENT

- 10.19 The village is linear in form due to the steep valley sides and riverside setting, and development tends to front directly on to the road. Grey sandstone, white painted stone buildings with slate roofs are the principal building materials of the traditional cottages, farms and farm buildings. Leeford Bridge and the bridge immediately to the south are both grade II listed structures as is Hall Farmhouse at the edge of the settlement. Modern development has centred around the area of Leeford Green and predominantly consists of large detached dwellings set back from the road.

LOCAL SERVICES

- 10.20 Brendon is popular with tourists due to its attractive moorland and valley setting particularly in relation to the 'Doone Valley' from Malmsmead following Badgworthy Water upstream. Tourism is essential to the local economy with several local businesses reliant on visitors to the area, including the Staghunters Inn Hotel, and other guest houses and B&Bs in the village.
- 10.21 Brendon has no public transport serving the local community although the parish is within the Ilfracombe and District Ring and Ride community transport scheme.



SETTING

- 10.22 The adjoining settlements of Bridgetown and Exton are the two main settlements in Exton parish and are generally considered as one community. For this reason they are identified as one settlement within the Local Plan. The A396 is one of the main tourist routes in the National Park and passes directly through Bridgetown.
- 10.23 Bridgetown and Exton lie in the incised, wooded Exe Valley, interspersed with improved pasture that defines much of the floodplain landscape. Bridgetown Wood and Rabbit Wood are designated local wildlife sites.



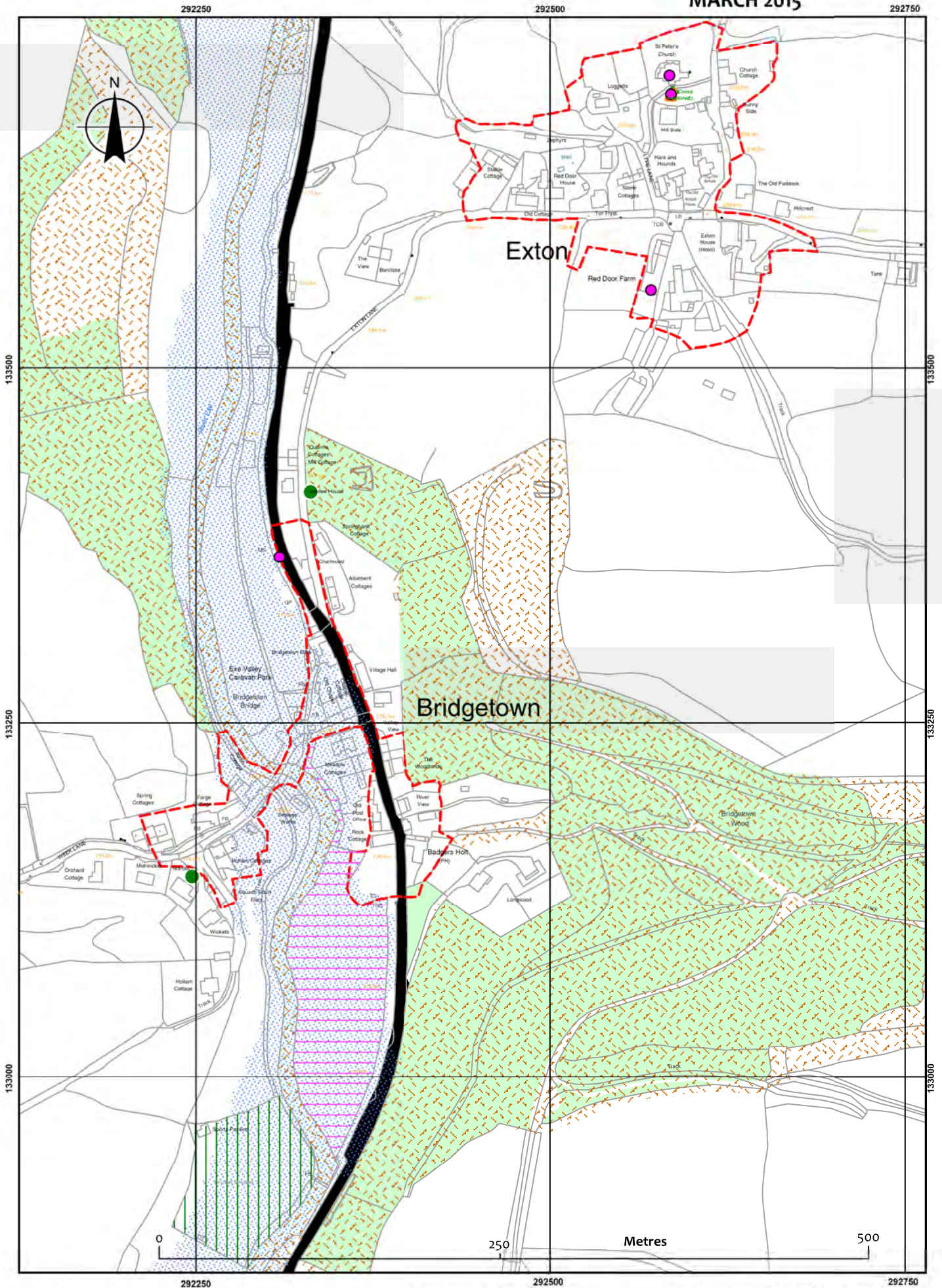
Week Lane, Bridgetown

BUILT ENVIRONMENT

- 10.24 The settlement of Bridgetown is linear in form as it follows the river valley and is largely aligned with the main road. Due to its proximity to the River Exe, a number of buildings are at risk of flooding. Exton is a more tightly knit group of traditional buildings that includes the parish church, on the steep hillside north-east of Bridgetown. Due to its topography and built form there are some issues with access and parking.
- 10.25 Many of the traditional buildings within the settlements are exposed stone or rendered stone with slate roofs. Most modern development has been located in Bridgetown, as infill development along the A396 and to the west of the River Exe along Week Lane.

LOCAL SERVICES

- 10.26 Community facilities within Bridgetown include the pub, cricket ground and the village hall. There is also a camping and caravan site in the village located next to the River Exe. A regular bus service, between Minehead and Tiverton, serves the settlements 6 days a week. A demand responsive transport initiative is also available for communities in West Somerset.



SETTING

10.27 The settlement of Brompton Regis lies five miles east of Dulverton on the Brendon Hills. It is surrounded by rolling farmland with wooded valleys to the south and west and views across to Haddon Hill. The village is served by a network of single track roads leading off to the B3190 and B3224. The road from Heathpoult Cross to Machine Cross, less than a mile to the west, is also part of the local freight route that links with the B3224 and B3190. Wimbleball Lake lies two miles to the east and is a key visitor attraction for the area.

BUILT ENVIRONMENT

10.28 Much of the historic core of Brompton Regis is clustered around the listed Grade II* parish church of St Mary. These older buildings are cottages built of rendered stone which would formerly have been lime-washed and roofed in local slate. More modern housing development such as Brompton Meadows and Haddon Close has taken place along the main approach roads to the village.

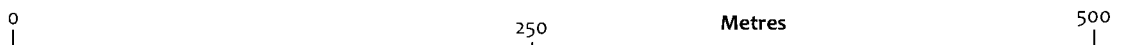
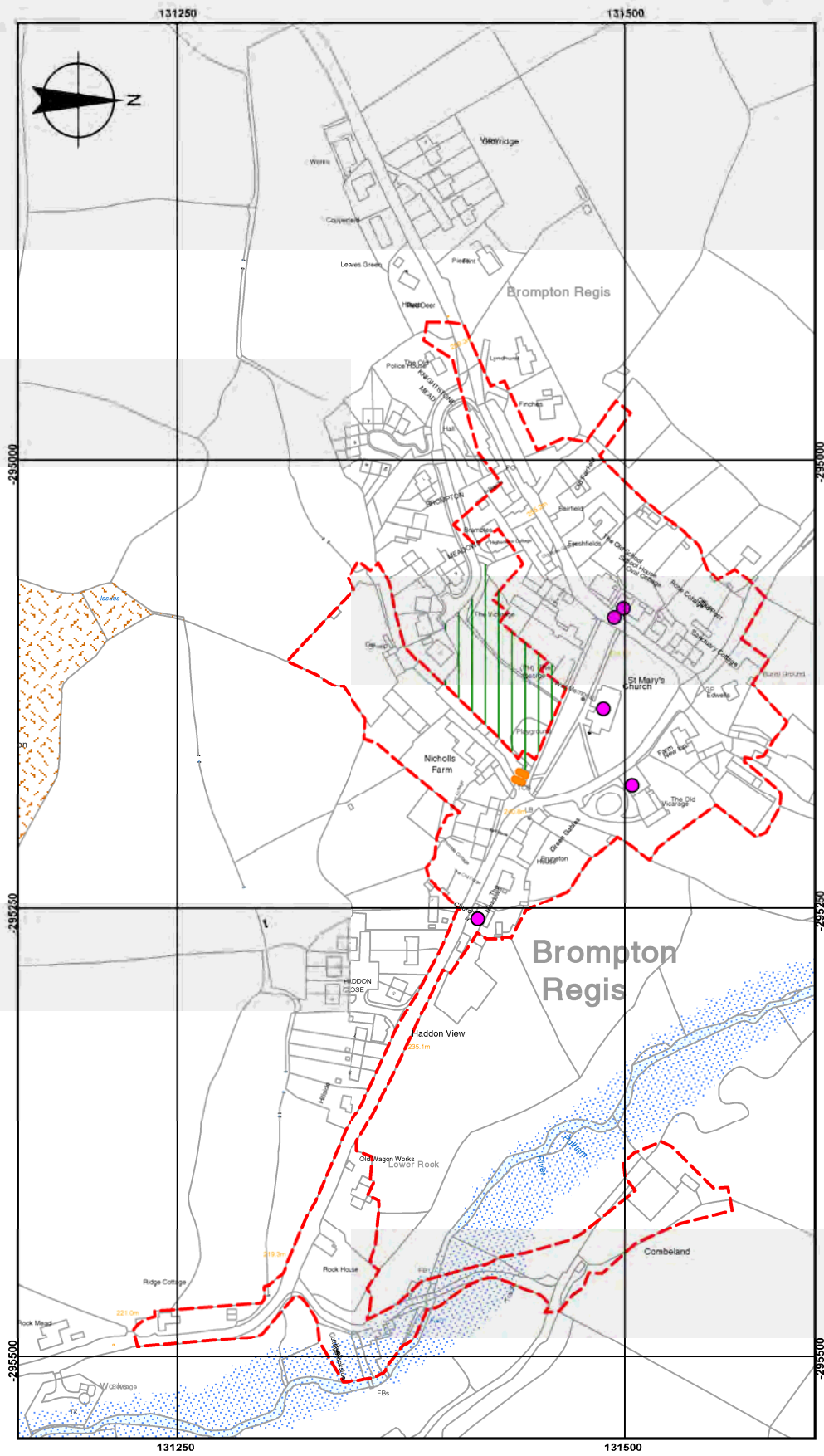
LOCAL SERVICES

10.29 The George Meadow Millennium Green is an important open space and amenity area for the community. Key community facilities are the public house and the village hall which also hosts the village shop run by volunteers and once a week the mobile Post Office. The former Post Office and Village Shop discontinued trading in 2008 due to the round of Post Office closures.

10.30 There is no regular daily bus service calling at Brompton Regis. A single bus service runs from Dulverton to Minehead via Brompton Regis, once a week. Brompton Parish Lifts is a community car scheme that provides a valuable transport service for those unable to access private transport and a demand responsive transport initiative is also available for communities in West Somerset.



Sanctuary Cottage and The Old Post Office, Brompton Regis



CHALLACOMBE	Village
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See Inset Map 5 at the end of the Plan

SETTING

10.31 Challacombe lies in the shallow valley of the upper reaches of the Bray River, surrounded by permanent pasture which extends out to high moorland. It is accessed via the B3358 which is one of the main transport routes that pass through the National Park. Several properties that are sited close to the minor road following the river are within an area at risk of flooding. A local wildlife site also adjoins the settlement to the rear of Home Place on Barton Plantation fields.

BUILT ENVIRONMENT

10.32 The dispersed pattern of the settlement includes buildings each side of the B3358 along Bickfont Hill to Barton Gate, and those extending along the river valley towards Challacombe Bridge. Many of the buildings in the village are traditional cottages with rendered stone or cob walls with slate roofs. The historic core of the village includes much of the built development within the valley setting; the footbridge near Town Farm is a grade II listed structure and is the only listing within the main settlement. More modern development has been limited and includes some post-war terraced housing at the top of Bickfont Hill and some detached residences close to the main settlement grouping.



Brookside, Challacombe

LOCAL SERVICES

- 10.33 The main community services in the village are the Post Office & Stores and the Black Venus Inn. The local economy is dependent on farming and tourism with a number of holiday lets (one including a health spa) and a small camp site in the village.
- 10.34 There is no bus service for Challacombe. The nearest access point for a bus service is over two miles away at Friendship Cross. There is a ring and ride community transport scheme available for residents which do have access to private transport.

Inset Map 6 at the end of the Plan

SETTING

- 10.35 Cutcombe and Wheddon Cross are the largest settlements in the parish of Cutcombe. Due to their proximity they are generally considered to be one settlement and are identified as such for the Local Plan.
- 10.36 The village lies within a farmed landscape of permanent pasture land enclosed by hedgebanks. The landscape setting of the settlements is strongly influenced by the incised wooded valleys surrounding the settlement, and the open moorland of Dunkery Hill. At a height of approximately 300 metres, the settlement is very prominent in the landscape and is visible from several miles away, including from Dunkery Beacon.

BUILT ENVIRONMENT

- 10.37 The historic core of the settlement centres on the Grade II* St John's Church and Codecombe House in Cutcombe, whilst older properties in Wheddon Cross have developed around the crossroads of the A396 and B3224. The main traffic problem experienced is congestion around the crossroads particularly in relation to where the roads narrow between buildings which immediately front the road. Congestion most frequently occurs during the peak tourist season due to the volume of traffic experienced on the main transport routes, and when large vehicles meet.
- 10.38 There has been considerable post-war development in both Cutcombe and Wheddon Cross. The redevelopment of the former Livestock Market site included new affordable homes to meet local housing need at Meadow Close.



Meadow Close, Wheddon Cross

LOCAL SERVICES

- 10.39 For a village of this size, there is a relatively wide range of facilities and services including Cutcombe First School, the petrol station with a shop and Post Office, recreation facilities, pub, and the Moorland Hall. There is a regular bus service that runs 6 days a week between Minehead and Tiverton.
- 10.40 Agriculture is an important part of the local economy and character of the parish, with a local livestock market at the centre of Wheddon Cross which is important both locally

and for the farming community of the National Park. There are a number of businesses within the village that serve the local community and tourists. Many of the businesses, including light industry, provide a range of employment opportunities for people in the local area. Recent economic opportunities have been provided through the development of business units as part of the redevelopment of the livestock market site.

POTENTIAL COMMUNITY PROJECT

10.41 Cutcombe First School occupies a particularly restricted site. Traffic hazard problems exist and there are staff parking difficulties. It is proposed that part of the adjacent field is safeguarded to extend the school site in due course. The school also requires land for playing field use.

ES-D1 CUTCOMBE AND WHEDDON CROSS COMMUNITY SAFEGUARDING AREA
Land to the north of Cutcombe First School, as shown on Inset Map 6, is safeguarded for an extension to the school site and school playing field.

See Inset Map 7 at the end of the Plan

SETTING

- 10.42 Dulverton lies on the southern boundary of the National Park within the incised wooded valley landscape character area of the River Barle. The Barle valley broadens considerably and much of the town has a gently sloping south and west facing aspect with some areas at risk of flooding. The main A396 route lies a mile to the east with the B3222 passing directly through the town via the High Street and the B3223, leading off from Fore Street towards Winsford Hill.
- 10.43 The surrounding woodland areas are important for wildlife particularly Burridge Woods that are internationally designated for their wildlife importance (Exmoor & Quantocks Oakwoods SAC) and the River Barle supports otters.
- 10.44 There are a number of trees within and adjoining the settlement that are protected through Tree Preservation Orders. The parkland setting of Pixton House also has a number of veteran trees, which are important to the landscape setting of the town.

BUILT ENVIRONMENT

- 10.45 The inherent character of Dulverton is that of a long established small market town. The conservation area was designated in 1994 and includes most of the earlier pre-19th century settlement. Dulverton retained its compact plan until the early 20th century with the main concentration of buildings in Fore Street, High Street and Bank Square and adjoining lanes.
- 10.46 The post-war development of housing estates to the east of the historic settlement has in effect doubled the size of the built-up area. The pattern of development bears very little resemblance to the historic core, and it is visually separated by small fields, either side of the well-used Abbot's Way footpath which forms a link between the old and new parts of the settlement. A number of local affordable homes have been developed in Dulverton including homes at Allers View.



Fore Street, Dulverton

LOCAL SERVICES

- 10.47 Dulverton has a wide range services and facilities which serve the local community and surrounding communities including those outside the National Park, such as part of Battleton and Brushford. The centre of the settlement has a variety of shops, tearooms and restaurants, in addition to a hotel, pubs and a number of offices. The town is an important visitor destination for those visiting or staying on Exmoor, and there are several shops and facilities to cater for their needs. The number of shops, businesses and community facilities is therefore considered to be relatively high compared to other settlements of this size outside the National Park⁸⁸⁰.
- 10.48 All Saints First School and Dulverton Middle School are both located within the eastern part of the settlement, which includes the Dulverton Children's Centre. Fishers Mead Community Centre and the new Dulverton Medical Centre are also located in this area; accessed from Jury Road (B3222) via Amory Road and Barns Close, and by the Abbot's Way footpath.
- 10.49 Dulverton is relatively well served by public transport with regular bus services to Tiverton, Minehead, and Taunton. A community bus also travels to Minehead once a week and a demand responsive transport initiative is also available for communities in West Somerset.

DULVERTON PARISH PLAN

- 10.50 Dulverton Parish Plan results were published in 2010 which expressed the views of residents under a series of topic headings. Many of the issues raised through the parish plan have been resolved or are in the process of being resolved. A number of projects that have been completed include the provision of allotments and refurbishment of the Barns Close playground.

POTENTIAL COMMUNITY PROJECT

- 10.51 The Town Council has highlighted the need to safeguard land for a cemetery extension as the existing cemetery is nearing capacity. This area is shown as a 'community safeguarding area' on the Dulverton Inset Map 8, and will be safeguarded from other forms of development under policy ES-D2 Dulverton Community Safeguarding Area.

ES-D2 DULVERTON COMMUNITY SAFEGUARDING AREA

Land adjacent to the cemetery in Dulverton, as shown on Inset Map 7, is safeguarded for an extension to the existing cemetery.

⁸⁸⁰ Further detailed analysis for retail and leisure uses in Dulverton can be found in: GVA & C4G (2011) Quantitative Needs Assessment – West Somerset Council and Exmoor National Park Authority

DUNSTER	Village
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See Inset Map 8 at the end of the Plan

SETTING

- 10.52 The parish of Dunster lies partly within the National Park boundary. The main settlement is Dunster situated on the A396 close to the junction with the A39. The settlement known as Dunster Marsh is located to the north east of the A39 outside the National Park boundary within the local planning area of West Somerset Council.
- 10.53 Dunster occupies a unique landscape setting within the Avill Valley, surrounded by the wooded hills of Grabbist and Gallox Hill including the historic park and gardens associated with the castle which are a designated heritage asset. The setting of the village is dominated by Dunster Castle on its elevated site while the Yarn Market is an important landmark in the High Street.

BUILT ENVIRONMENT

- 10.54 Dunster is regarded as one of the finest examples of a medieval settlement in the country. Pevsner, in the “Buildings of England” series describes Dunster as “unsurpassed in Somerset amongst small towns”. The settlement has a notable history dating from the early 10th century.
- 10.55 The Conservation Area was designated in 1973, and further revised in 1980; it includes the historic core of the settlement, which is based on the medieval street pattern and burgage plots around the Castle, church and priory. Due to the historic importance of the settlement it is not surprising that there are 120 listed buildings including four Grade I and six Grade II*. Dunster Castle is a Grade I Listed Building owned by the National Trust since 1976. Other prominent Grade I listed historic buildings are the Priory Church of St George and the Yarn Market. Many houses are small cottages that are either built of stone, some with slate hanging or rendered and roofed using materials such as thatch, natural slate or clay tiles.
- 10.56 Some limited post-war development has taken place on the fringes of the settlement or as infill. One of the most notable successes for the settlement was the restoration of the Tithe Barn to provide a community facility for meetings and events. Other enhancements include village signs and heritage trail and the footpath linking the Dunster Steep car park to Gallox Bridge (see the Dunster Action Plan for further details).
- 10.57 The main A396 tourist route through the village has significant traffic impacts on the historic character of the settlement. The levels of traffic during peak holiday periods can cause some localised congestion, particularly either side of the traffic lights that limit the traffic to one-way through Church Street. Ben Hamilton-Baillie Associates carried out a detailed analysis and prepared proposals in the future design and maintenance of Dunster’s streets and spaces in 2009⁸⁸¹. The improved pedestrian walkway, through re-setting the cobbled frontage and incorporating smooth linear paving strips along the eastern side of the High Street, was one of the recommendations in this analysis.

LOCAL SERVICES

- 10.58 As a renowned historic village, tourism is the mainstay of the local economy⁸⁸². Dunster is a popular tourist destination and there are several shops, cafés and

⁸⁸¹ Ben Hamilton-Baillie Associates Ltd (2009) Dunster: Reconciling Place and Movement in an Historic Village

⁸⁸² Further detailed analysis for retail and leisure uses in Dunster can be found in: GVA & C4G (2011) Quantitative Needs Assessment – West Somerset Council and Exmoor National Park Authority

restaurants in the village which cater for visitors. Key community facilities include Dunster First School, the GP surgery, Post Office, Dunster Tithe Barn, and the Memorial Hall. Recreation areas include the children's play area, the allotments, and Dolland's Meadow recreation field.

- 10.59 Dunster is well-served by public transport, with daily services travelling through the village, and at Dunster Steep on the A39. People can easily access Minehead and other towns including Taunton and Tiverton. However, a demand responsive transport initiative is also available for communities in West Somerset particularly those who find it difficult to access public transport.



Dunster High Street with the Yarn Market in the foreground

DUNSTER ACTION PLAN

- 10.60 The Dunster Working Group is a partnership of local authorities, voluntary organisations and businesses that seek to enhance the environmental quality, economic viability and social well-being for Dunster Village and the surrounding area. As a result of extensive consultation the Dunster Action Plan⁸⁸³ presents a range of enhancement projects for the village, including detailed analysis and proposals by Ben Hamilton-Baillie Associates relating to future design, management and maintenance of streets and the public realm.

- 10.61 The vision for the plan is:

“Dunster will be the best medieval village in England that meets the future needs of the whole community, fosters a thriving economy and provides a welcome for visitors while conserving its unique natural and historic environment”

⁸⁸³ A Draft Action Plan for Dunster 2012 to 2014

EXFORD	Village
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See Inset Map 9 at the end of the Plan

SETTING

- 10.62 Exford is located in the centre of the National Park and lies on the B3224, one of the main tourist routes through Exmoor. The settlement is located on a crossing of the River Exe where the valley widens and tributary streams join the river. There are a few residential and business premises lying close to the river that are within an area of flood risk.
- 10.63 The village green is the main recreation and amenity area in Exford that is popular with the community and visitors alike, providing an open setting in the centre of the village.

BUILT ENVIRONMENT

- 10.64 Exford has two distinct focal points, the village green and the bridge, and much of the historic settlement is centred on these features. Many of the buildings in the centre of the village are traditional cottages of stone or rendered stone walls roofed with slate or thatch.
- 10.65 Post-war development has generally taken place along the approach roads of Church Hill and Park Street. A development of local affordable housing at Westcott Mead, was completed in 2009 and is located at the top of Church Hill.

LOCAL SERVICES

- 10.66 Exford has a number of community services and facilities, with the Exmoor Stores (including Post Office) as the main community service in the village. Other facilities include Exford First School, the memorial hall, two pubs (within the hotels), the social club, the cricket ground, and the church.



Park Street, Exford

- 10.67 Although tourism is important to the local economy, the village also provides jobs in other sectors, including farming, hunting and shooting. There are a variety of local businesses in the village which provide employment in the local area including hotels, motor vehicle repair garages, and a livery yard.
- 10.68 Exford has a limited daily bus service to Minehead. However, a demand responsive transport initiative is available for communities in West Somerset.

SETTING

- 10.69 Luxborough lies in a deep valley in the Brendon Hills, accessed by a network of narrow lanes leading off the A39, A396 and B3224. The landscape character is defined by wooded and farmed hills with the main area of settlement nestled in the valley bottom.
- 10.70 Although regarded as one community, the settlement of Luxborough comprises of three separate hamlets: Churchtown, Kingsbridge and Pooltown.
- Churchtown is a collection of farms and cottages centred on St Mary's Church.
 - Kingsbridge is within the valley of the Washford River and includes a number of small cottages, The Royal Oak Inn and the village hall.
 - Pooltown is a small cluster of cottages and farms along the valley from Kingsbridge.

BUILT ENVIRONMENT

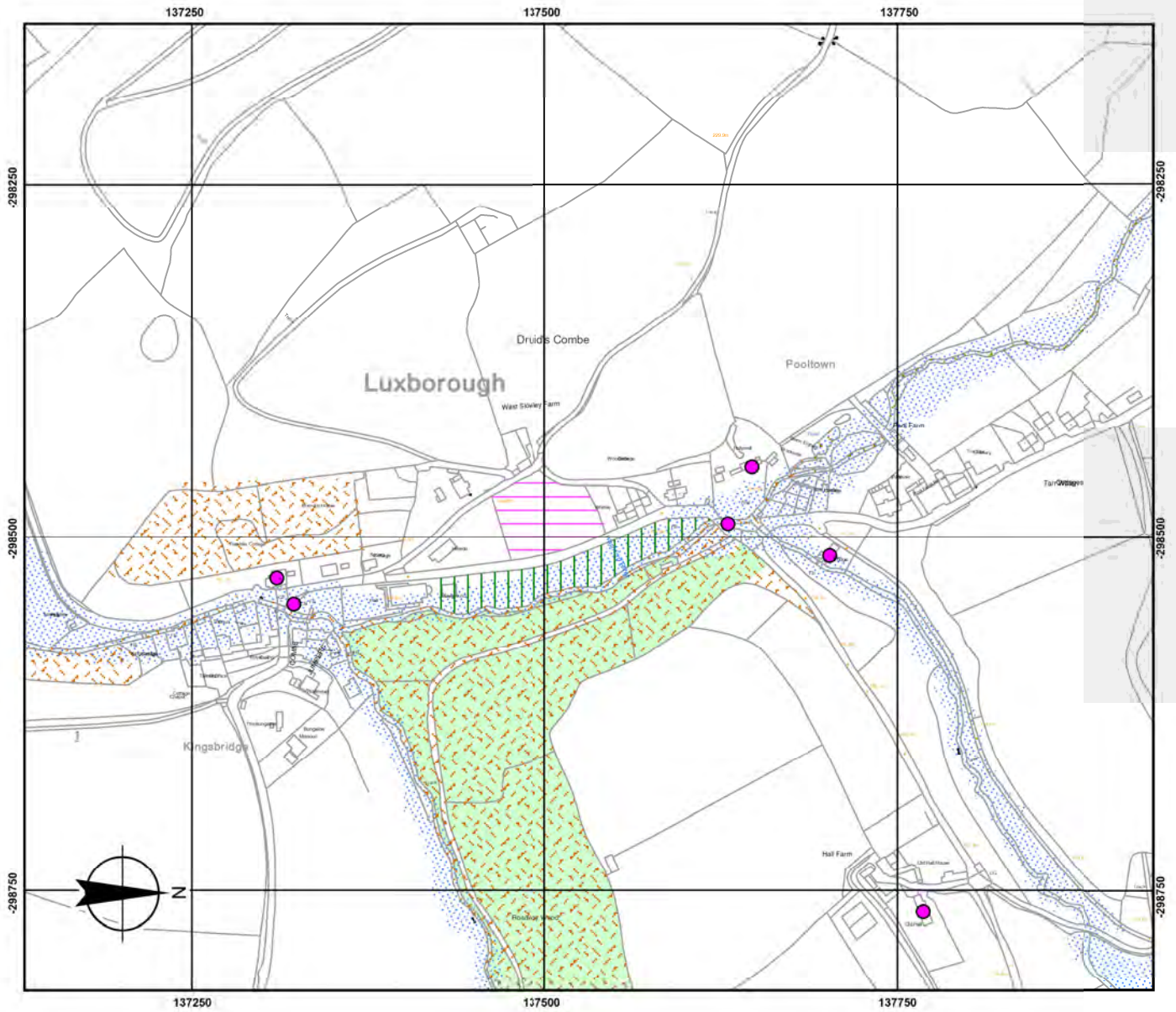
- 10.71 Many of the older cottages in Luxborough are built of local rubble stone – some exposed stone walls and others pink or white stone and render, roofed in Treborough slate or thatch. These materials reflect the local geology and provide a locally distinctive village character. The main settlement of Kingsbridge experienced a significant level of new housing during the 1980s and 1990s, and a small development of affordable homes was built in Pooltown during this period.



Cottages at Pooltown, Luxborough

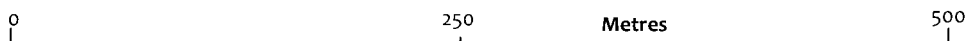
LOCAL SERVICES

- 10.72 One of the most important landscape features of Luxborough is the area of open land between Kingsbridge and Pooltown. This land is used for informal recreation, and provides views into and out of the two hamlets, as well as maintaining open space between them. The key community facilities are the Royal Oak Inn, the village hall and recreation area which are in Kingsbridge; and the church at Churchtown.
- 10.73 With several farms in the parish, agriculture is important to the local economy. Game-shooting is also an important local business, particularly through the autumn/winter months and is a popular form of farm and forestry diversification.
- 10.74 There is no public transport service available. However, a demand responsive transport initiative is available for communities in West Somerset where there is a lack of public transport provision.



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See inset map 11A/11B at the end of the Plan

SETTING

- 10.75 Lynton, Lynmouth and Lynbridge are considered together as one settlement (Lynton & Lynmouth) with a range of services and facilities serving the local and wider community. Barbrook is identified as a Village within the parish; distinct from Lynton and Lynmouth.
- 10.76 Lynton & Lynmouth is situated on the coast with the settlement of Lynton situated in a cliff-top position around 150 metres above Lynmouth. Lynton is approached by road via the B3234 from Lynmouth or Barbrook, which links with the A39. The steep gradients of Countisbury Hill on the A39 and on the B3234 from Lynmouth tend to emphasize a sense of seclusion.
- 10.77 The settlement area is defined by its densely wooded setting within the high wooded coast and combes landscape character area. Much of this woodland is protected for its landscape significance and the woodland in the East Lyn valley towards Watersmeet is also internationally designated for its wildlife⁸⁸⁴. The town is on the edge of the area designated as Heritage Coast, however the area around Manor Green is within this designation.
- 10.78 Lynton is the larger of the two settlements, and unlike other Exmoor settlements, is mainly of more recent origin resulting from a period of rapid development from the late 19th to early 20th century. This was influenced by the development of the Lynton to Barnstaple narrow gauge railway and the construction of the Cliff Railway between the two settlements. The Lynton to Barnstaple railway closed in the 1930s, but a short section has been reopened at the former Woody Bay Station in 2004, as a tourist attraction, with long term plans to reinstate the full length of the former railway (policy RT-S2 Reinstatement of the Lynton & Barnstaple Railway).
- 10.79 Lynmouth has a small harbour, and is situated at the confluence of the East Lyn and West Lyn rivers. It is renowned for the catastrophic flood in 1952 which resulted in loss of life and the destruction of many buildings. Resulting changes led to the realignment of part of the river and the construction of Lyndale Bridge and Riverside Road. A hydro-electric power plant is situated at Glen Lyn on the River West Lyn and an experimental marine tidal turbine generator was sited off the coast from Lynmouth from 2003 – 2007 that has helped to identify Lynmouth as a tidal demonstration site within the South West Marine Energy Park⁸⁸⁵.

BUILT ENVIRONMENT

- 10.80 The Lynmouth Conservation Area was designated in 1973 and includes; the original fishing settlement around the harbour and the mainly 19th century development along the West Lyn and on the slopes above the main village. The Lynton Conservation Area was designated in 1986 and includes the historic pre-nineteenth century core and the area dating from the settlements' expansion in the Victorian era.
- 10.81 Modern development has generally occurred in Lynton as the coast and deep valley settings of Lynmouth are significant constraints in relation to considering new development. Many residential dwellings have been provided through change of use of existing buildings such as hotels or on other brownfield sites such as the Castle Heights development. A number of local affordable homes have been provided in Burvill Street through the redevelopment of the Hobbs Yard and the adjacent chapel.

⁸⁸⁴ Exmoor & Quantocks Oakwoods Special Area of Conservation

⁸⁸⁵ Regen SW (2013) South West Marine Energy Park Prospectus – 4th edition



View of Lynton from Ladywell Path

LOCAL SERVICES

- 10.82 Many of the well-established local businesses in Lynton and Lynmouth are related to the tourism and service sector which provide employment opportunities for people in the local area - hotels being the largest employer. There are also a wide range of community services and facilities present, including the health centre and primary school, which have been sustained due to the relative isolation and consequent high level of self-containment of the settlement⁸⁸⁶.
- 10.83 The town is served by a regular Monday to Saturday bus service which enables members of the community to access a wider range of services and facilities at Barnstaple. The Ilfracombe Ring & Ride Scheme is a community transport scheme that operates within a number of towns and rural locations including Lynton & Lynmouth.

⁸⁸⁶ Further detailed analysis for retail and leisure uses in Lynton & Lynmouth can be found in: GVA & C4G (2011) Quantitative Needs Assessment – West Somerset Council and Exmoor National Park Authority

LYNTON & LYNMOUTH NEIGHBOURHOOD PLAN

CONTEXT

- 10.84 Neighbourhoods should plan positively to support local development to shape and direct development in their area outside the strategic elements of the Local Plan⁸⁸⁷.
- 10.85 The Localism Act introduced new powers for neighbourhood planning to enable communities to prepare Neighbourhood Development Plans. The Government introduced Neighbourhood Plan Vanguard Scheme whereby Lynton and Lynmouth Town Council, with the support of other partners, were successful in their bid to become one of the first areas to trial neighbourhood planning. The neighbourhood plan process enabled Lynton & Lynmouth Town Council and the wider community to build on previous engagement with the local community on the strategy and detail for the types of development needed for the long term sustainable future of the parish. The neighbourhood plan was brought into force as part of the development plan for the area in December 2013.
- 10.86 Due to the particular circumstances relating to the timing and preparation of The Lyn Plan (Lynton & Lynmouth Neighbourhood Plan) and to ensure that the policies within the neighbourhood plan are not invalidated by the policies in this plan⁸⁸⁸ should a conflict between policies arise, a statement regarding its status is included in policy ES-S2 Lynton & Lynmouth Neighbourhood Plan.
- 10.87 Lynton & Lynmouth Town Council has asked that Exmoor National Park Authority use the Local Plan policy RT-D3 Safeguarding Serviced Accommodation for the determination of proposals relating to the change of use of hotels and guest houses within the neighbourhood plan area as it gives greater flexibility to the tourism industry within Lynton & Lynmouth, particularly those smaller establishments which were formerly dwellings. RT-D3 will therefore be given greater weight than the Lyn Plan policy E2 Change of Use of Hotels and Guest Houses in the consideration of related proposals.
- 10.88 The Lyn Plan and contains a range of policies relating to development and land use within the parish. It has been prepared to ensure that it is in general conformity with those policies considered to be strategic within the Exmoor National Park Local Plan 2001-2011 and in conjunction with the preparation of this Local Plan. It is considered therefore, that the policies in the Lyn Plan will also be in general conformity with the strategic policies in this Local Plan.

⁸⁸⁷ DCLG (2012) National Planning Policy Framework (Paragraph 16). Department of Communities and Local Government

⁸⁸⁸ HM Government (2004) Planning & Compulsory Purchase Act 2004. *The Stationery Office, London* - [Section 38(5)] – if to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approved or published (as the case may be).

ES-S2 LYNTON & LYNMOUTH NEIGHBOURHOOD PLAN

- 1. Development proposals within Lynton & Lynmouth parish shall be determined in accordance with the Lynton & Lynmouth Neighbourhood Plan 2013 – 2028 and the strategic policies of the Local Plan.**
- 2. Development management policies in the Local Plan will only be given greater weight in the following circumstances:**
 - a) where the neighbourhood plan is silent, indeterminate or out of date; and**
 - b) using RT-D3 safeguarding serviced accommodation to determine related proposals for the change of use of serviced accommodation within the Neighbourhood Plan area (over-riding the Lyn Plan policy E2 Change of Use of Hotels & Guesthouses).**
- 3. Should a conflict arise between development management policies in the Local Plan and the policies in the Neighbourhood Plan, the conflict will be resolved in favour of the Neighbourhood Plan until the end of the Plan period in 2028 or until it is reviewed, whichever is earlier, unless it is considered that the proposal would otherwise have a detrimental impact on the achievement of National Park purposes.**



Lynmouth Harbour and the Rhenish Tower

SETTING

- 10.89 Monksilver lies on the very eastern edge of Exmoor National Park. The National Park boundary splits both the parish and the village along the B3188. For planning purposes, therefore, part of Monksilver village lies within the National Park and part within West Somerset District Council's area.
- 10.90 Monksilver lies at the foot of the Brendon Hills within an area of predominantly arable land and permanent pasture. Front Street is adjacent to the stream that flows through the settlement; as a result some properties are within an area at risk of flooding.



High Street, Monksilver

BUILT ENVIRONMENT

- 10.91 The village is small and the buildings are tightly knit, characterised by colour-washed, thatch or slate cottages. There are several listed buildings including the Grade I Church of All Saints and the Grade II Notley Arms and its 19th century outbuildings, which were formerly the stables now converted to ancillary visitor accommodation.
- 10.92 There has been some small-scale post-war development that includes housing at Pond Orchard and Sunny Bank to the north of the church.

LOCAL SERVICES

- 10.93 The Notley Arms public house, the church and village hall are the main community facilities in Monksilver. The EMN (Elworthy, Monksilver and Nettlecombe) Hall is located just outside the National Park boundary and is a well-used modern facility for the three neighbouring parishes of Elworthy, Monksilver and Nettlecombe and a popular venue for artists and musicians.
- 10.94 There are no bus services in Monksilver. There are however, community transport and demand responsive transport schemes that serve the Monksilver area.

PARRACOMBE	Village
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See Inset Map 13 at the end of the Plan

SETTING

- 10.95 The settlement of Parracombe includes the hamlets of Bodley, Prisonford and Churchtown that together with the main village are considered as one community. Parracombe is within the North Devon area of the National Park and is bypassed by the A39 main tourist route. It lies in the upper Heddon Valley within a landscape characterised by small and medium sized fields enclosed by hedgerows.
- 10.96 A local wildlife site is located to the south of the village around Holwell Castle. The dismantled railway line of the Lynton and Barnstaple Railway that closed in 1935 is identified on the Historic Environment Record. The former route passes through the village at Prisonford (see policies RT-13 Safeguarding Former Railways and RT-S2 Reinstatement of the Lynton & Barnstaple Railway).
- 10.97 The valley bottom and land along the Heddon River and its tributaries are at risk from flooding; the 1952 and 1960 floods caused considerable flood damage in the village. There are a number of properties within areas at greater risk from flooding, particularly those close to Parracombe Bridge.



Parracombe Lane, Parracombe

BUILT ENVIRONMENT

- 10.98 Distinctive features of Parracombe include the steep roads and narrow, twisting lanes together with the high density of the buildings around Parracombe Bridge and along Parracombe Lane. A conservation area was designated for the whole of Parracombe in 1997. This area includes a number of listed buildings and structures including the Grade I listed 12th century St Petrock’s Church. The Scheduled Ancient Monument of

Holwell Castle to the south of the village is a striking local landmark consisting of earthworks relating to a motte and bailey of medieval origins⁸⁸⁹.

- 10.99 Post-war development has taken place at various locations in the village including detached dwellings along the lane at Pencombe Rocks, Bodley Lane and the area around Prisonford and Churchtown. Some small terraces of former local authority housing were also developed along Bodley Lane.

LOCAL SERVICES

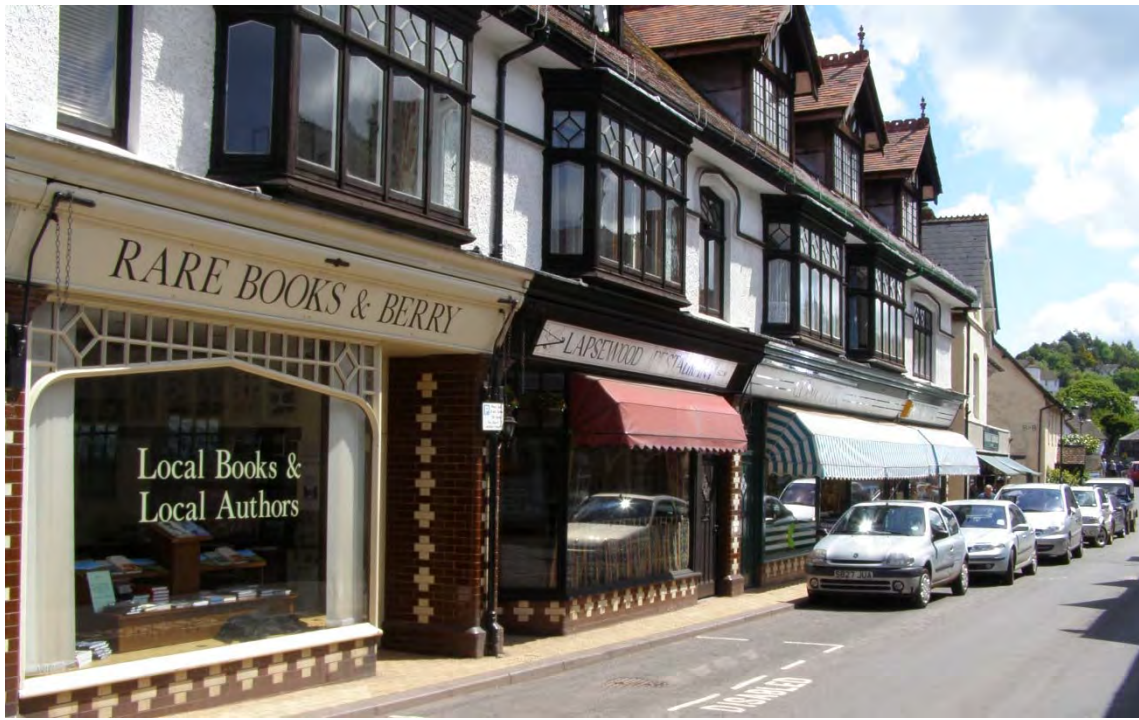
- 10.100 Within the village there are a number of community facilities including the primary school (part of the West Exmoor Federation together with Lynton and Kentisbury primary schools), Village Stores and Post Office, the Coronation Playing Field, the village hall and the Fox & Goose Inn.
- 10.101 The village is well-served by public transport. The main service from Barnstaple to Lynton and Lynmouth stops at Heddon Bridge runs on a regular basis from Monday to Saturday. There are occasional traffic problems either through speed or congestion due to the narrow lanes.

⁸⁸⁹ Exmoor National Park Historic Environment Record www.exmoorher.co.uk

See inset map 14 at the end of the Plan

SETTING

- 10.102 Porlock is located near the coast and sits at the point where the low farmed landscape of the Vale of Porlock meets the high wooded coastal landscape character of Worthy Wood and Hawkcombe. The steep hill-sides of Bossington Hill form a backdrop to flat fields extending to Porlock shingle-ridge and saltmarsh and the Bristol Channel. The area of Porlock to the north of the A39 is within the area designated as Heritage Coast.
- 10.103 Barbastelle bats from the Exmoor & Quantocks Oakwoods SAC commute around and, where suitable, through the settlement to forage on the coast. Barbastelle bat hunting territories are also likely to exist around the southern edge and within the village possibly through to the area north of Dunster Steep. Potential impacts include disturbance or fragmentation of commuting habitat and degradation of foraging habitat for barbastelle bats.
- 10.104 Porlock is located between Minehead six miles to the east and Lynton & Lynmouth, about fifteen miles to the west. The A39 passes through the village and up Porlock Hill, with a 1 in 4 gradient and sharp hairpin bends that can act as a barrier to some traffic. The privately owned toll road provides an alternative route avoiding Porlock Hill. Traffic congestion through the centre of Porlock, is considered a problem by road users and pedestrians; this is mainly experienced during the peak holiday period.



Porlock High Street

BUILT ENVIRONMENT

- 10.105 Porlock has a conservation area that was designated in 1984 and further extended in 1987 and 2013. It includes much of the historic pre-19th century settlement. There are a number of 18th century and earlier cottages with characteristic front projecting stacks. Much building and re-building occurred late in the 19th century and into the early 20th century. Within the conservation area are 11 listed building entries. The majority are grade II listed, although the Parish Church and Doverhay Manor are

grade I and grade II* listed respectively. The protection of the conservation area and the built heritage of the parish are considered to be important locally.

- 10.106 On the flatter land to the north of the village lies a substantial area of post-war housing with newer housing built in 1970s-1980s on the eastern side of the village.

LOCAL SERVICES

- 10.107 Porlock has a wide range of services and facilities that serve the local population and surrounding communities. Porlock, similar to other local service centres, is a popular tourist destination and there are a range of businesses which are supported by the local community and visitors to the settlement. The Porlock Visitor Centre works to promote the local area and Exmoor as a whole.
- 10.108 The community services and facilities in the village include St Dubricius First School, the medical practice, village hall, recreation ground, pharmacy, convenience stores, Post Office, fire station, petrol station, and places of worship. Porlock also has a variety of shops, guest houses, hotels and cafés – many of which are located on the High Street⁸⁹⁰.
- 10.109 There is a daily bus service which links Porlock to the coastal town of Minehead which lies just outside the National Park boundary and provides a wide range of services and facilities, including additional public transport links to further afield.

PORLOCK VALE PARISH PLAN

- 10.110 The Porlock Vale Parish Plan “Shaping Our Future” was published following extensive community consultation – this plan identified a wide range of issues that were reviewed to inform a series of actions defined as Priority 1 or 2. Priorities that are linked to planning and land use included more affordable homes for local families, improved footpath access and cycle route creation. A scheme providing affordable homes for local people at Chadwyck Close was completed in 2013.

⁸⁹⁰ Further detailed analysis for retail and leisure uses in Porlock can be found in: GVA & C4G (2011) Quantitative Needs Assessment – West Somerset Council and Exmoor National Park Authority

SETTING

- 10.111 Porlock Weir is a small coastal community within the parish of Porlock, which lies wholly within the West Somerset area of the National Park. The settlement is accessed via the B3225 road 1.5 miles west of Porlock – this is a no through road, apart from the privately owned Worthy Toll Road that provides an alternative route to the 1:4 Porlock Hill along the A39. The surrounding area is part of the Porlock Manor Estate – this pattern of land ownership has had an unbroken succession of estate landlords that dates from Saxon times. This has enabled a conservative approach to land management to be maintained that is not uncommon with large landowners⁸⁹¹.
- 10.112 Porlock Weir is situated within two distinct landscape character types of the Low Farmed Coast and Marsh where the main area of the settlement lies close to the coast and the High Wooded Coast, Combes and Cleaves that includes the higher settlement area along Chapel Lane and out towards Worthy. The settlement is within the area designated as Heritage Coast, and the shingle ridge along the coast is an important geomorphological feature designated as a Site of Special Scientific Interest.
- 10.113 Barbastelle bats from the Exmoor & Quantocks Oakwoods SAC are also possibly present around the village and in the surrounding countryside. Potential impacts include disturbance or fragmentation of commuting habitat and degradation of foraging habitat for barbastelle bats.

BUILT ENVIRONMENT

- 10.114 The settlement has ancient origins evolving around the harbour on the Bristol Channel coast, and has in former times been referred to as Porlock Quay. The settlement has operated as a small port for centuries; the present harbour dates from the early-mid 19th century.
- 10.115 A conservation area encompassing the whole settlement, foreshore, surrounding fields, and the small grouping of buildings at Worthy was designated in 1973. The harbour and surrounding buildings such as Pieces of Eight, Bottom Ship, Turkey Island and Gibraltar Cottages, and Lane Head are considered to be of particular value; as are the old lime kilns⁸⁹².

LOCAL SERVICES

- 10.116 The settlement has a range of services and facilities including the church, convenience store, pub and a range of other businesses including shops, cafés and the Anchor Hotel. There is also a public car park and toilets which highlight the significance of tourism to Porlock Weir. The working harbour is economically important to the local area and also a significant tourist draw.

COASTAL CHANGE

- 10.117 Porlock Weir’s coastal location is likely to become a more significant issue for certain areas of the settlement in the future, due to the fact that future coastal defence provision will be unlikely to attract public funds, and the retention of defences would potentially impact on the wider coastal area. The North Devon and Somerset Coastal Advisory Group are responsible for producing a Shoreline Management Plan from Anchor Point to Hartland Point. This plan sets out the approach to future coastal

⁸⁹¹ Fisher, J (2004) Porlock Weir Conservation Area Character Appraisal 2004

⁸⁹² Highlighted by Porlock Parish Council (April 2013)

management and has proposed that there will be a move towards no active intervention with currently defended areas facing increased risk of flooding and erosion in the medium to long term due to rising sea levels and increased exposure to wave activity⁸⁹³.

- 10.118 It is recommended that measures are put in place to manage the risk of coastal change at Porlock Weir to mitigate the displacement of people and loss of property and facilities. The Somerset Coastal Change Pathfinder project has assisted coastal communities who are most at risk from sea level rise to help them adapt to coastal change. The project helped to raise awareness and build resilience in the community in relation to identifying likely risks of increased coastal flooding and future scenarios for the settlement⁸⁹⁴. Properties close to the shore are most at risk from coastal change and have been included within the Coastal Change Management Area (CCMA) to enable opportunities for adaptation and relocation (CC-S3 Porlock Weir Coastal Change Management Area, and CC-S4 Replacement Development from Coastal Change Management Areas). Outside the CCMA, it is important that the community can function as a settlement and the Local Plan provides opportunities for the conversion and change of use of existing buildings to a range of uses, in addition to some small scale provision of employment space where it is compatible with existing industries at Porlock Weir. Policy also provides for affordable housing to meet the needs of the community. A strategy will be prepared to guide the long term development of Porlock Weir in the context of the policy approach.

PORLOCK VALE PARISH PLAN

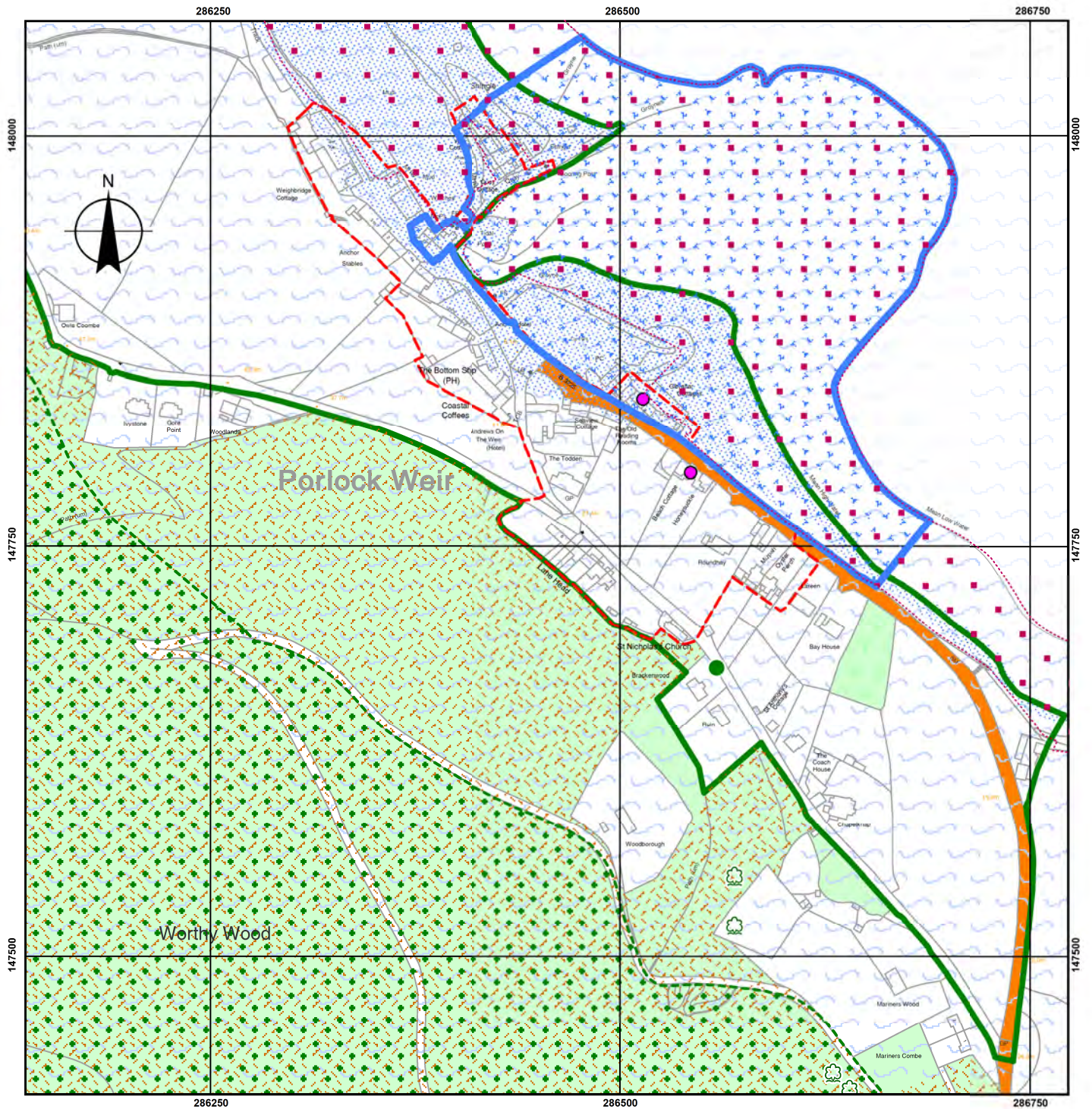
- 10.119 The Porlock Vale Parish Plan “Shaping Our Future” was published following extensive community consultation – this plan identified a wide range of issues that were reviewed to inform a series of actions defined as Priority 1 or 2. Priorities that are linked to planning and land use included more affordable homes for local families, improved footpath access and cycle route creation.



Porlock Weir Harbour

⁸⁹³North Devon & Somerset Coastal Advisory Group (2010) North Devon & Somerset Shoreline Management Plan Review Final (October 2010) Hartland Point to Anchor Head [

⁸⁹⁴ Somerset Coastal Change (2011) Pathfinder project



The area shown in Inset Map 14 Porlock Weir is wholly within the Heritage Coast designation

SETTING

- 10.120 Roadwater lies in the narrow valley of the Washford River, along the road linking the neighbouring village of Luxborough with the A39 at Washford. The landscape setting has influenced the strong linear pattern of the village, with buildings situated each side of the road for nearly a mile.
- 10.121 As the settlement is nestled in the valley bottom, a considerable number of properties are located within an area at risk of flooding. Harpers Wood is a local wildlife site that lies adjacent to the recreation ground.

BUILT ENVIRONMENT

- 10.122 The use of building materials reflects the underlying geology with exposed red sandstone, pink and white painted stone and render, and slate roofs. The southern end of the settlement contains the main grouping of traditional buildings that typify the use of local materials.
- 10.123 One of the key characteristics of Roadwater is the former West Somerset Mineral Railway, dating from the 19th century. Many buildings and features associated with the railway and dating from this era remain intact, including the old Roadwater station and the Methodist Church, which are important to the cultural identity of the village. Other buildings such as forges, mills and farm buildings connected with other long standing industries are also significant to the overall character of Roadwater.

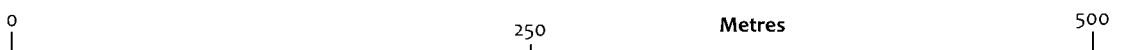
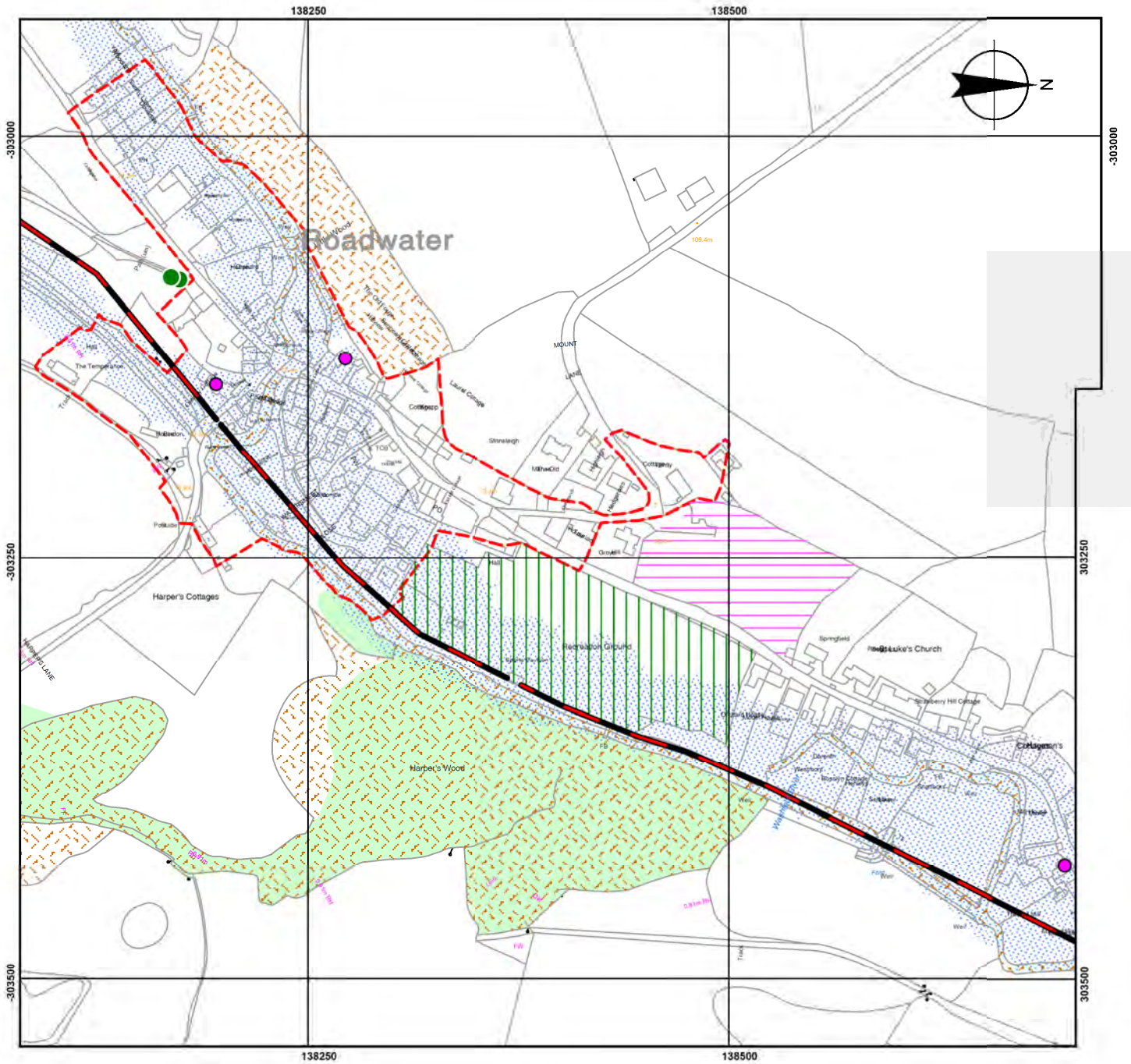


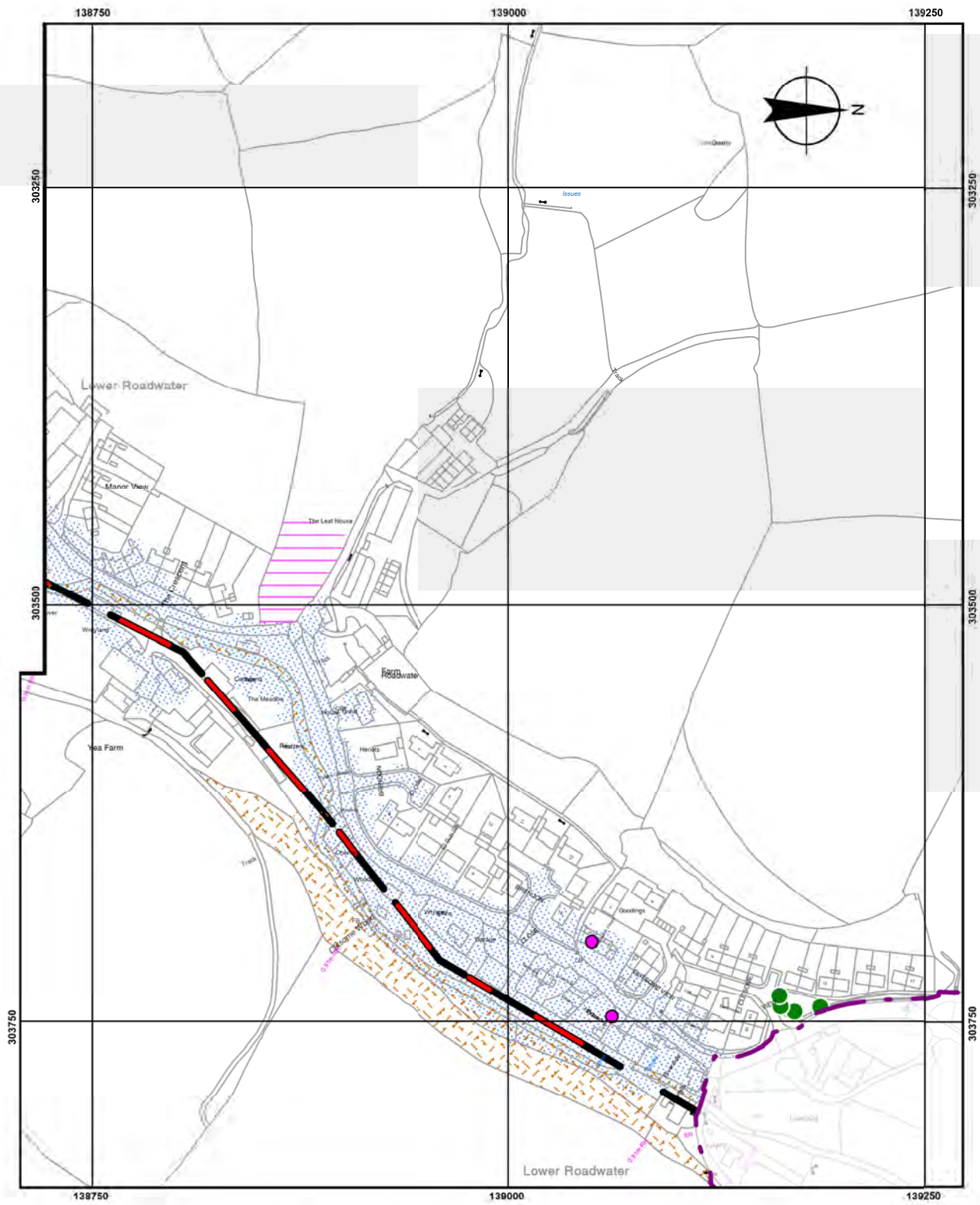
Station Road, Roadwater

- 10.124 Post-war development, including buildings at the northern end of the village, tends not to have been built in a distinctive local style. However, one of the most recent residential developments, built at the end of the 1990s at Watersmeet Close on the Old Nurseries site, used locally distinctive materials including natural stone walls and slate roofs.
- 10.125 A significant issue raised by the local community concerns the degradation of Roadwater's appearance and character through the cumulative impact of the loss characteristic boundary features and garden space, to accommodate off-street parking. Particular consideration will be given to the conservation or enhancement of such boundary features and private amenity space in determining planning proposals likely to affect the coherence and character of the streetscape (CE-S6 Design and Sustainable Construction Principles).

LOCAL SERVICES

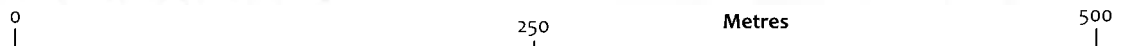
- 10.126 Roadwater is one of the few villages on Exmoor which still has a petrol filling station and garage. Other community services include the Post Office & Village Stores, village hall, pub and the recreation ground. There is also some light industry which includes the Singer Instruments factory located in the centre of the village, which extended its premises in 2012.
- 10.127 There is no public transport service available. However, a demand responsive transport initiative is available for communities in West Somerset where there is a lack of public transport provision.





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SIMONSBATH	Village
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See Inset Map 17 at the end of the Plan

SETTING

- 10.128 Simonsbath is the most isolated settlement in the National Park located on the junction of the B3223 and B3358 at a crossing of the River Barle and surrounded by high moorland. The main character of Simonsbath lies in its open nature and the views out to the surrounding landscape.
- 10.129 The landscape and built character of the parish was greatly influenced by the Knight family during the 19th century through a programme of draining, ploughing and fertilising to improve the moorland soils on a large scale. The Knight family built a number of farms in the parish and introduced new working practices.
- 10.130 The River Barle and the adjoining flood plain areas are designated as a SSSI as the river is of very high quality and has hardly been modified at all by pollution, water abstraction or river engineering. Otters, a feature of the Exmoor & Quantocks Oakwoods SAC, are present in the River Barle. Development may result in increased access to the watercourse causing disturbance.
- 10.131 Although Simonsbath lies in a valley setting, no properties are within areas at risk of flooding. Birch Cleave woods are a prominent landscape feature and provides a sense of enclosure to the settlement – this woodland is protected by a Tree Preservation Order. Ashcombe Plantation to the north of Simonsbath is a local wildlife site and an important designed landscape formerly associated with Simonsbath House.



Simonsbath House Hotel, Simonsbath

BUILT ENVIRONMENT

- 10.132 A small group of buildings form the central core of the settlement although the pattern of the settlement is generally dispersed along the main approach roads. The 17th century Grade II listed Simonsbath House Hotel is the most dominant building in the village. The Simonsbath Sawmill, owned by the National Park Authority, was

renovated with the support of Heritage Lottery funding, including reinstatement of the leat and weir.

- 10.133 Many of the dwellings were built for farm workers to manage the Knight estate and subsequently the Fortescue estate. Subsequent ownership of the estate has resulted in some fragmentation with several properties becoming privately owned rather than tied-housing. There has been very little modern development in the settlement and has generally occurred as infill.

LOCAL SERVICES

- 10.134 The village is a popular base for walking and touring and tourism is one of the mainstays of the local economy. Businesses in the village include the Simonsbath House Hotel and outdoor recreation centre, Exmoor Forest Inn and hotel, Boevey's tearooms and a small shop.
- 10.135 There are no regular bus services passing through the village, but demand responsive community transport is available from Monday to Saturday for those without access to other forms of transport.

See Inset Map 18 at the end of the Plan

SETTING

- 10.136 The settlement of Timberscombe is compact in form, situated either side of the Timberscombe Stream at the head of the Avill valley and includes the hamlet of Cowbridge to the east. The settlement lies within the landscape character type of the Farmed and Settled Vale but its setting is also strongly influenced by the surrounding Plantation Hills landscape to the north and east, and the farmed and wooded Brendon Hills to the south.
- 10.137 Some properties within the centre of the village where the valley widens are located in an area at risk of flooding



The mill stream, Timberscombe

BUILT ENVIRONMENT

- 10.138 The central area of the village has complex, narrow street pattern, part of which was formerly the main route through the village. These streets are fronted by the tightly packed houses of the historic village centre around the Grade I listed Church of St Petrock. The traditional buildings in Timberscombe are built of local red sandstone with Treborough slate roofs.
- 10.139 There has been a significant level of post-war housing development that has expanded the settlement, but retained its nucleated pattern. The most recent housing at Vicarage Close was developed in the 1980s that included 18 affordable homes. The level of development since this time has been relatively minor.
- 10.140 A short by-pass was constructed in the 1980s to improve traffic flow through the village on the A396, one of the main tourist routes through Exmoor.

LOCAL SERVICES

- 10.141 Timberscombe has several local facilities including: Timberscombe First School, Post Office, church, chapel, village hall and pub. The majority of the local economy is based on agriculture and tourism with a number of self-catering holiday lets and complexes within the settlement including Duddings and The Great House. The play area, playing field and cricket ground are important recreation areas for the village.
- 10.142 As Timberscombe is located on one of the main routes (A396) through the National Park, there are a number of buses which serve the village; the main daily service operates between Minehead and Tiverton.

TIMBERSCOMBE COMMUNITY LED PARISH PLAN

- 10.143 A parish plan was published following extensive engagement with parishioners to help shape the long term future for the parish. The parish plan includes an Action Plan to help address issues highlighted through consultation. Actions that are related to planning and land-use include the future provision of parking in the village, protecting local services such as the Post Office, provision of a village shop, and ensuring suitable housing provision.

See Inset Map 19 at the end of the Plan

SETTING

- 10.144 Winsford, lies within the Incised Wooded Valleys landscape character type, a settlement cluster characterised by stone bridges and fords that originates from an ancient river crossing, where the Winn Brook meets the River Exe. The settlement has developed from the historic core along the converging lanes that creates a spacious character. The settlement is situated off the main road network just a mile and a half west of the A396.
- 10.145 There are a number of properties within an area at risk of flooding, particularly those that lie adjacent to the River Exe and Winn Brook. Berry Cleeve Wood is a local wildlife site and important upland oak habitat that lies close to the village and strongly influences the landscape setting of the village.



Cottages at The Steep, Winsford

BUILT ENVIRONMENT

- 10.146 The character of the historic centre of the settlement has remained largely unaltered, and includes groups of stone or rendered cottages, roofed with thatch or slate centred on the river crossings. There are several listed buildings in the village including the Grade I Church of St Mary Magdalene. Enhancement projects in the village include the bridge to the village green, extension, extension and refurbishment of the village hall, and enhancement of the area around the war memorial.
- 10.147 Post-war development has generally occurred along the radial routes that converge in the village centre with some infill. The most recent significant development was the construction of six affordable homes at Darby's Knap in the 1990s, on the edge of the village adjacent to Edbrooke Road. Two further local affordable homes have been provided along Ash Lane.

LOCAL SERVICES

- 10.148 The village has a number of community services and facilities which include the village hall, church, vehicle repair garage and the pub which hosts the village shop. There are also several open spaces in Winsford important for recreation such as the village green, tennis courts and the sports field. Winsford is a popular destination for visitors with tourism sector being particularly significant for the local economy - businesses in the village include tearooms, hotels and B&B establishments.
- 10.149 There is limited public transport serving the village. The Minehead to Tiverton bus service operates Monday to Saturday and extends to Winsford twice a day which enables residents to travel to Minehead. A demand responsive bus service is also available from Monday to Saturday.

SETTING

- 10.150 Withypool is located a mile west of the B3223 and is situated in the Barle landscape character area of the Incised Wooded Valleys. It has a remote upland character with enclosed farmland on the valley sides extending out to the south and west to the open moorland of Withypool Common.
- 10.151 Although the settlement has developed around the crossing of the River Barle, there are only a few properties within areas of high flood risk and are those located close to New Bridge and at the confluence of Pennycombe Water and the River Barle along Sparrow Lane.
- 10.152 Withypool Common is part of the Exmoor Heaths SAC and barbastelle bats, a feature of the Exmoor and Quantocks Oakwoods SAC, are likely to be foraging to the south and east of the village. Potential impacts include disturbance or fragmentation of commuting habitat, and degradation of foraging habitat for barbastelle bats. The River Barle is a Site of Special Scientific Interest (SSSI) and land to the east of Fir Tree Farm is a local wildlife site.



Withypool cottages and the River Barle

BUILT ENVIRONMENT

- 10.153 Traditional buildings are generally stone and render walls with slate roofs and are grouped to the north of the river, closely following the contours of the hillside. Post war development, including affordable housing, has generally occurred on infill sites within the village and to the south of the river up the hill to the edge of Withypool Common. The area between the car park and the River Barle is an important amenity area for visitors to Withypool.

LOCAL SERVICES

- 10.154 Local community services and facilities in Withypool include the Post Office and Shop, church and village hall. The tearoom and The Royal Oak Inn are examples of businesses in the village which cater for visitors as well as the local population.
- 10.155 There is no regular public transport serving the village, but a demand responsive bus service is available from Monday to Saturday.

WOOTTON COURTENAY	Village
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See Inset Map 21 at the end of the Plan

SETTING

- 10.156 Wootton Courtenay is situated on the lower slopes of Wootton Common, with a south facing aspect overlooking the Avill valley which runs towards Dunkery Beacon. The settlement lies within the high vale character area of the Farmed and Settled Vale landscape and is particularly characterised by the undulating landform and small fields bounded by hedgerows. A number of narrow winding lanes connect the village to the main A39 and A396 routes lying to the north and south of the settlement respectively.
- 10.157 Barbastelle bats, a feature of the Exmoor and Quantocks Oakwoods SAC, are likely to be foraging around the village. Potential impacts include disturbance or fragmentation of commuting habitat, and degradation of foraging habitat for barbastelle bats.
- 10.158 The lower part of the village has a few properties within an area at greater risk of flooding.



The Old Rectory at the centre of Wootton Courtenay

BUILT ENVIRONMENT

- 10.159 The older, historic centre of the settlement has a diverse pattern of informal building groups including some main groupings around the Grade I listed All Saints Church at the main village centre, and the lower village around the stream crossing Wootton Courtenay. This central part of the village was designated a Conservation Area in December 1994 and includes most of the earlier settlement up to the 19th century. There are a number of listed buildings and structures within the conservation area including the grade I listed Church of All Saints that dates from the 13th century.
- 10.160 The traditional building forms are natural stone, render, slate and thatch cottages fronting narrow lanes with natural stone paving and cobbled areas. Another important local feature is the high red sandstone boundary walls that provide a sense of enclosure to the historic settlement core. More recent development is generally lower density consisting of detached dwellings within large curtilages along the approach roads. This form of ribbon development has created a more linear settlement form.

LOCAL SERVICES

- 10.161 Community services and facilities in the village include: The Villagers Shop and Post Office, village hall, church and recreation ground. There are a few local businesses in and around Wootton Courtenay, including: the vehicle repair garage, and the Dunkery Beacon Country House. There is no regular public transport serving the village, but a demand responsive bus service is available from Monday to Saturday.

11. MONITORING AND IMPLEMENTATION

- 11.1 The Local Plan's policies will be implemented in two ways. Firstly, its strategic policies set the overall context and parameters for appropriate land use and will guide the type, location and nature of future development proposals across the National Park. Secondly, its set of development management policies set detailed and specific criteria for types of development or specific planning issues, against which (alongside other statutory development plan policies, national policies and material considerations) planning applications for development will be assessed.
- 11.2 The National Park's statutory purposes and responsibilities set the overall parameters for the National Park Authority in terms of monitoring. The Authority has a duty to prepare a National Park Management Plan which sets the long-term vision, aims and objectives for Exmoor National Park. The Management Plan for 2012-2017 is underpinned by a "State of the Park" report, produced once every 5 years, which provides a wide range of evidence to illustrate the condition of the Park. Monitoring of the Local Plan takes place on an annual basis.
- 11.3 Within this wider context, in order to understand the *Plan's* impact on the Park, the impact and effectiveness of its policies will be regularly monitored. Monitoring is an important part of the Local Plan process, helping to ensure that the Plan remains relevant, effective and up to date. The way in which we will monitor the Local Plan's policies is set out in the Monitoring Framework below.
- 11.4 In order to report the results of monitoring, the Authority will produce an Annual Monitoring Report (AMR) which will specifically detail the progress that has been made in achieving the objectives of this Local Plan. The AMR will be a guide as to whether there is any need to make adjustments to the Plan or particular policies and what changes should be proposed at the next review. Contextual information about the National Park is also provided in the Park Profile, which forms part of the AMR.
- 11.5 The National Park Authority will also monitor the impact of planning application (development management) decisions and appeal decisions on a continuous basis against the objectives underpinning the policies contained in this Local Plan. The Authority will do this by using its Planning Application Computer System (PACS) which is used to record all planning applications. PACS is linked to the Authority's Geographical Information System (GIS) which maps all relevant natural and built environment resource constraints and designations which, along with relevant planning policies, inform decisions made in response to planning applications. In addition to monitoring local changes, the Authority will need to respond to any relevant changes in Government policy and review policies accordingly.

THE MONITORING FRAMEWORK

- 11.6 The indicators set out in the Monitoring Framework supplement the evidence in the State of the Park report and will be used to monitor the impact of the policies within each section of the Local Plan. The majority of indicators are relevant to numerous policies and these links are shown in the first column of the Framework.
- 11.7 The indicators in the Framework are either 'core' or 'contextual'. The former specifically monitor the policies within the Local Plan and the latter are included to provide context. The contextual indicators are labelled as such and often link specifically to the State of the Park report, where the broader context for the National Park is set out. The Framework also shows where indicators link to the objectives outlined in the Sustainability Appraisal Scoping Report.

Exmoor Local Plan 2011-2031 Monitoring Framework

Key: Change to existing indicator: ■ New indicator: ■ Existing indicator – no change: ■ No colour

Relevant Local Plan Policies	Local Plan Monitoring Indicator	Data source	Geographical coverage and frequency	Links to Local Plan Objectives	Links to Sustainability Appraisal Objectives
Section 3: General Policies					
GP1	Covered by multiple indicators under CE-S1, CE-S2, CE-S3, CE-S4, RT-S1				
GP2	Number and area of major developments approved within the National Park	Housing Land Availability	National Park; Annual		
GP3	Proportion of dwellings completed at Local Service Centres, Villages and Porlock Weir	Housing Land Availability	National Park; Annual		
GP3	Proportion of employment completed at Local Service Centres, Villages and Porlock Weir	Employment Land Database	National Park; Annual		
GP4	Dwelling density of completed sites	Housing Land Availability	National Park; Annual	1, 12	10
GP4, HC-D1, HC-D4, HC-D14	Number and proportion of dwellings delivered through conversion/change of use/subdivision in settlements and open countryside	Housing Land Availability	National Park; Annual		8
GP5	Number of planning obligations secured	PACS	National Park; Annual		
Section 4: Conserving and Enhancing Exmoor					
CE-S1	Area of orchard created or lost a result of development	PACS/GIS	National Park; Annual	5	12
CE-S1	Number of tree preservation orders made following Section 211 Notices within conservation areas in the National Park.	ENPA	National Park; Annual		

Relevant Local Plan Policies	Local Plan Monitoring Indicator	Data source	Geographical coverage and frequency	Links to Local Plan Objectives	Links to Sustainability Appraisal Objectives
CE-S1	Change in area of moor and heath as a result of development	PACS/GIS	National Park; Annual		
CE-S1, CE-D1	Number of planning applications refused on landscape grounds	PACS	National Park; Annual	2	12
CE-S1	Contextual indicator Length of traditional hedgerow lost	PACS	National Park; Annual		2
CE-S2	Number of lighting conditions attached to permissions within the National Park	PACS	National Park; Annual	1	
CE-S3	Contextual Indicator % of broad habitats in SSSIs in: (i) favourable, (ii) unfavourable recovering (iii) unfavourable declining condition % Local Wildlife Sites in good condition	Natural England (SSSIs), Somerset Environmental Records Centre/Devon Biodiversity Records Centre (LWS)	National Park; Annual	3, 4	
CE-S3	Change in area of priority habitats as a result of development.	PACS/GIS	National Park; Annual		
CE-S3	Number and proportion of applications refused for reasons of harm to protected/important species.	PACS	National Park; Annual		
CE-S3	Number of developments with provision for protected/important species.	PACS	National Park; Annual		
CE-S3	Number of applications for a DEFRA licence.	PACS	National Park; Annual	3, 4	2
CE-D2	Number of developments incorporating green infrastructure provision (including enhancements for wildlife)	PACS	National Park; Annual		
CE-S4	Number of conservation area enhancement schemes undertaken	ENPA	National Park; Annual	5, 8	

Relevant Local Plan Policies	Local Plan Monitoring Indicator	Data source	Geographical coverage and frequency	Links to Local Plan Objectives	Links to Sustainability Appraisal Objectives
CE-S4	Number of Scheduled Monuments affected by development and number of applications refused	PACS	National Park; Annual		
CE-S4, RT-D13	Number of sites on the Historic Environment Record affected by development and number of applications refused	PACS/GIS	National Park; Annual		8
CE-D3	Contextual Indicator Number (and %) of listed buildings on the 'at risk' register	English Heritage/Local survey	National Park; Annual	5	
CE-D3	Number of heritage assets removed from 'at risk' registers as a result of development	English Heritage/Local survey	National Park; Annual		
CE-S4, CE-D3	Number of applications refused due to adverse impact on: <ul style="list-style-type: none"> historic parks or gardens listed buildings 	PACS	National Park; Annual	5, 8	
CE-S5, HC-D1, HC-D4, HC-D6, HC-D7, HC-S7, SE-S2, SE-S3	Number of applications permitted and refused for conversions of traditional buildings to different use classes in Local Service Centres, Villages, Porlock Weir and in the Open Countryside	PACS	National Park; Annual		8
CE-S5, HC-D1, HC-D4, HC-D7, HC-D8, HC-S7, SE-S2, SE-S3	Number of applications permitted and refused for conversions of non-traditional buildings to different use classes in Local Service Centres, Villages, Porlock Weir and in the Open Countryside	PACS	National Park; Annual	5	

Relevant Local Plan Policies	Local Plan Monitoring Indicator	Data source	Geographical coverage and frequency	Links to Local Plan Objectives	Links to Sustainability Appraisal Objectives
CE-S6	Percentage of new residential buildings roofed in traditional materials	PACS	National Park; Annual		
CE-S6	Number of planning applications refused on design grounds	PACS	National Park; Annual		
CE-S6, CC-S1	Number of developments incorporating Sustainable Drainage Measures	PACS	National Park; Annual		
CE-D5, CE-D6	Number of applications for changes/additions to shop frontage/signage rejected	PACS	National Park; Annual		
CE-S7	Number of quarries for local building materials	PACS	National Park; Annual	6	10
CE-S9, CE-D7	Number of other mineral applications permitted	PACS	National Park; Annual		
Section 5: Responding to Climate Change					
CC-S1, CC-D1, CC-S2, CC-S3	<ul style="list-style-type: none"> Number of applications refused on the grounds of flood risk or coastal change Number of developments located in Flood Risk Zones 2 and 3a 	PACS/GIS	National Park; Annual	19, 20	3
CC-S1, CC-S5, CC-D3, CC-D4	Number of renewable energy/energy conservation projects permitted by type, size and location	PACS	National Park; Annual		4
CC-S3, CC-S4	Number of buildings lost and/or replaced due to coastal change	PACS	National Park; Annual	19, 20, 21	4, 13
CC-D2	Number of water storage facilities permitted	PACS	National Park; Annual		
CC-S6	Contextual Indicator Number of recycling facilities	District/County Councils	National Park; Annual		11

Relevant Local Plan Policies	Local Plan Monitoring Indicator	Data source	Geographical coverage and frequency	Links to Local Plan Objectives	Links to Sustainability Appraisal Objectives
CC-S7, CC-D2, CC-D5	Contextual Indicator Length and % length of monitored rivers achieving 'good' or 'high' ecological status (under the Water Framework Directive)	Environment Agency	National Park; Frequency unknown	7	1
CC-S7, CC-D2, CC-D5	Number of recorded water pollution incidents on Exmoor	Environment Agency	National Park; Annual		
Section 6: Achieving a Thriving Community					
HC-S1	Gross dwelling completions	Housing Land Availability	National Park; Annual		
HC-S1	Net dwelling completions	Housing Land Availability	National Park; Annual		
HC-S1	Percentage of completed dwellings on previously developed land	Housing Land Availability	National Park; Annual	1, 12	10
HC-S1	Number of dwellings under construction	Housing Land Availability	National Park; Annual		
HC-S1	Number of dwellings with extant planning permission not yet started	Housing Land Availability	National Park; Annual		
HC-S1, HC-S3, HC-D1, HC-D2, HC-D5, HC-D5, HC-D6	Proportion of new housing meeting community's need for affordable housing by location, development type and occupancy.	Housing Land Availability / Affordable Housing Live Update	National Park; Annual	12	6, 9
HC-S1	Affordable housing provision by type and size of dwelling.	Housing Land Availability / Affordable Housing Live Update	National Park; Annual		

Relevant Local Plan Policies	Local Plan Monitoring Indicator	Data source	Geographical coverage and frequency	Links to Local Plan Objectives	Links to Sustainability Appraisal Objectives
HC-S1	<u>Contextual indicator</u> Average private rent level	Valuation Office Agency	District; 6 monthly		
HC-S1	<u>Contextual Indicator</u> Ratio of average house prices to average household income.	Exmoor National Park House Price Survey (CACI data)	National Park; Annual		
HC-S1	<u>Contextual Indicator</u> Changes in house price relative to national, regional and county averages.	Exmoor National Park House Price Survey	National Park; Annual		
HC-S3	<u>Contextual Indicator</u> Number of up-to-date Parish housing need surveys	Rural Housing Project data and Local Housing Authorities	National Park; Annual		9
HC-S3	<u>Contextual Indicator</u> Number of households on District Councils' housing registers	Rural Housing Project data and Local Housing Authorities	National Park; Annual		
HC-S5	<u>Contextual Indicator</u> Number of second/holiday homes and empty homes at Parish level	North Devon and West Somerset Councils – Council Tax records	National Park (aggregated from Parish); Annual	12	
HC-S4	Number of principal residence dwellings completed as: <ul style="list-style-type: none"> • Change of use of hotels/ guest houses • Subdivision of dwellings • Conversion/change of use of other buildings in settlements • Enabling development to deliver affordable housing 	Housing Land Availability / PACS	National Park; Annual		
GP4, HC-D1, HC-D2, HC-D4,	Percentage of housing completions located on previously developed land (settlements)	Housing Land Availability	National Park; Annual		10

Relevant Local Plan Policies	Local Plan Monitoring Indicator	Data source	Geographical coverage and frequency	Links to Local Plan Objectives	Links to Sustainability Appraisal Objectives
HC-D5, HC-D6, HC-D7	Percentage of housing completions located on previously developed land (open countryside)	Housing Land Availability	National Park; Annual		
HC-D3	Number specialist dwellings completed	PACS	National Park, Annual		6, 9
HC-D3	Percentage of those in housing need due to unsuitable accommodation.	Rural Housing Project – Local Housing Authority data	National Park; Annual		9
HC-D4	Number of extended family dwellings completed	PACS	National Park, Annual	12	6, 9
HC-D5	Number of Custom/Self Build dwellings completed in rural communities	PACS	National Park, Annual	12	6, 9
HC-D6, RT-D3	Number of applications approved/refused for the change of use of serviced accommodation to housing	PACS	National Park, Annual	12	6, 9
HC-D8, HC-D9	Number of rural land based worker dwellings completed	PACS	National Park, Annual	12, 15	6, 9
HC-D10	Number of succession farm dwellings completed	PACS	National Park, Annual	12, 15	6, 9
HC-D11	Applications for temporary residential caravans approved/refused	PACS	National Park; Annual		
HC-D15	Applications for residential extensions approved/refused	PACS	National Park; Annual		
HC-D16	Applications for outbuildings approved/refused	PACS	National Park; Annual	5,12	
HC-D17	Number and proportion of planning applications for replacement dwellings refused	PACS	National Park; Annual		

Relevant Local Plan Policies	Local Plan Monitoring Indicator	Data source	Geographical coverage and frequency	Links to Local Plan Objectives	Links to Sustainability Appraisal Objectives
HC-S6, HC-D18	Distance of households from key services	IMD 2010	LSOA; Update 2015	13	14
HC-S6, HC-D18	Creation and loss of community services and facilities by use class (A & D)	PACS	National Park; Annual	13	6
HC-D20	Contextual Indicator Area of Important Open Space (Visual Amenity) within settlements	PACS/GIS	National Park; Annual	3, 4	12
HC-S7	Number of residential institutions permitted	PACS	National Park; Annual		
Section 7: Achieving a Sustainable Economy					
SE-S1	Proportion of new employment premises by location (parish) & use class	PACS / Employment Land Database	National Park; Annual		
SE-S1	Contextual Indicator Claimant count: Number of residents claiming Jobseekers Allowance	NOMIS	LSOA; Monthly		7
SE-S1	Contextual Indicator Employment by industry sector	Business Register and Employment Survey	Ward; Annual	14	
SE-S2 SE-S3 SE-D2	Area of floorspace created and lost by B1, B2, B8 and sui generis of the Use Classes Order in: <ul style="list-style-type: none"> • Local Service Centres and Villages, Porlock Weir • Open countryside 	PACS	National Park; Annual		7
SE-D1	Number and area of live-work units/homeworking spaces permitted	PACS	National Park; Annual	10, 13, 14	
SE-D1	Contextual Indicator Percentage of people aged 16+ in employment who are self-employed	2011 Census, ONS	Every 10 years	14	

Relevant Local Plan Policies	Local Plan Monitoring Indicator	Data source	Geographical coverage and frequency	Links to Local Plan Objectives	Links to Sustainability Appraisal Objectives
SE-S2, SE-S3, CE-S5	Number and area of employment permissions re-using existing: <ul style="list-style-type: none"> • Traditional buildings • Non-traditional buildings 	PACS	National Park; Annual	12	
SE-S4	Number and area of agricultural and forestry buildings permitted.	PACS	National Park; Annual	10, 15	7
SE-S4	Length of agricultural and forestry tracks permitted.	PACS	National Park; Annual	14, 15	
SE-S4	Number and proportion of applications for agricultural buildings refused.	PACS	National Park; Annual	14	
SE-S4	Contextual Indicator Number of farming businesses in agri-environment schemes.	Natural England	National Park; Annual		7
SE-S3, CE-S5	Number of farm diversification proposals and floor area requiring the conversion of: <ul style="list-style-type: none"> • Traditional buildings • Non-traditional buildings 	PACS	National Park; Annual	14, 15	8
Section 8: Achieving Enjoyment For All					
RT-S1	Number and proportion of applications for tourism related development permitted and refused.	PACS	National Park; Annual		
RT-D1, RT-D3	Number and floor area of serviced accommodation permitted and lost	PACS	National Park; Annual		
RT-D2	Number and floor area of staff accommodation permitted and lost	PACS	National Park; Annual	9, 16	7
RT-D4	Number and floor area of non-serviced accommodation permitted and lost	PACS	National Park; Annual		
RT-D5, RT-D9	Number tented campsites permitted and refused	PACS	National Park; Annual		

Relevant Local Plan Policies	Local Plan Monitoring Indicator	Data source	Geographical coverage and frequency	Links to Local Plan Objectives	Links to Sustainability Appraisal Objectives
RT-D6, RT-D9	Number of camping barns permitted and refused	PACS	National Park; Annual		
RT-D7	Number of certificated caravan sites approved	ENPA	National Park; Annual		
RT-D8	Number and proportion of applications for conversion of static caravan sites to chalet developments/alternative camping sites permitted	PACS	National Park; Annual		
RT-D9	Number of alternative camping accommodation permitted and refused	PACS	National Park; Annual		
RT-D10	Number and area of developments for shooting purposes permitted and refused	PACS	National Park; Annual	9, 10, 16	7
RT-D11	Number of equestrian developments permitted and refused	PACS	National Park; Annual	9, 10, 16	
RT-D12 AC-D1	Length of public right of way (km) affected by development <ul style="list-style-type: none"> • Lost • Diverted • Replaced • New provision 	PACS/Rights of Way Officer (ENPA)	National Park; Annual	9	14
Section 9: Achieving Accessibility For All					
AC-S1, AC-S3, AC-D2	Contextual Indicator Volume of traffic (all traffic/HGV traffic) <ul style="list-style-type: none"> • Average annual daily volume • Average August daily volume 	Devon County Council, Somerset County Council	Main routes in National Park; Annual	18	14

Relevant Local Plan Policies	Local Plan Monitoring Indicator	Data source	Geographical coverage and frequency	Links to Local Plan Objectives	Links to Sustainability Appraisal Objectives
AC-S1	Contextual Indicator Number of settlements with a daily bus service (excluding Sundays and Bank Holidays)	Traveline	National park; Annual		
AC-S2, AC-D2	Contextual Indicator Road safety: <ul style="list-style-type: none"> Number of accidents on roads in the National Park Number of people killed or seriously injured 	Somerset Road Safety Casualty Review; Devon Collision Map http://www.devon.gov.uk/collision-data-mapped	Point data; Annual		
AC-D1	Contextual Indicator Number of planning applications permitted with: <ul style="list-style-type: none"> Transport Assessment Transport Statement Travel Plan Air Quality Assessment 	PACS	National Park; Annual	7,18	1
AC-S3, AC-D3	Car, motorcycle, cycle and disabled parking provision in new development	ENP AMR	National Park; Annual		
AC-S3, AC-D3, AC-D4	Area of permanent and temporary car parking gained/lost	ENP AMR	National Park; Annual	18, 19	14
AC-S1, AC-D1	Proportion of new dwellings accessible by public transport or community transport services	ENP AMR	National Park; Annual		
AC-S4, AC-D5, AC-D7	Number of telecommunications masts and other antennae permitted as: <ul style="list-style-type: none"> New structures Extensions to existing structures 	ENP AMR	National Park; Annual	17	

Relevant Local Plan Policies	Local Plan Monitoring Indicator	Data source	Geographical coverage and frequency	Links to Local Plan Objectives	Links to Sustainability Appraisal Objectives
AC-S4, AC-D6	Number of new power lines/utility services undergrounded as a proportion of planning permissions	ENP AMR	National Park; Annual		
Section 10. Exmoor's Settlements					
ES-S1, ES-S2, ES-D1, ES-D2	Advice provided to communities: Number of Parish/Town councils or local groups seeking advice from the National Park Authority about local community plans, Neighbourhood Plans or projects.	ENP AMR	National Park; Annual	11	6

12. ANNEX 1: THE CONDUCT OF ARCHAEOLOGICAL WORK & HISTORIC BUILDING RECORDING WITHIN EXMOOR NATIONAL PARK

- 12.1 This annex is a guide for developers and their archaeological contractors, historic buildings advisors, architects and consultants and all involved in the planning process. It sets out standards and guidance for archaeological work and historic building recording in Exmoor National Park undertaken as part of the planning process. It will ensure that all work of this kind within Exmoor National Park is carried out in a professional manner and to a high standard.

INTRODUCTION

- 12.2 The National Planning Policy Framework 2012 considers that the Historic Environment is a material consideration in the determination of planning applications (paragraphs 4.87 – 4.113 of the Exmoor National Park Local Plan, set out the importance of Exmoor’s Heritage Assets, and policies CE-S4 and CE-D3, are designed to protect them).
- 12.3 The purposes of the National Park as set out in Section 61 of the Environment Act 1995 are: ‘to conserve and enhance the natural beauty, wildlife and *cultural heritage* of the area’ and ‘to promote opportunities for the understanding and enjoyment of the special qualities by the public’.
- 12.4 This document sets out the practical process of achieving the full potential of recording and preserving the National Park’s archaeological and built heritage. Also within the scope of this document is the archaeological recording of historic buildings.

UNDERLYING PRINCIPLES

- 12.5 The professional body for field archaeologists is the Institute for Archaeologists (IfA) whose members are bound to adhere to a Code of Conduct⁴⁶⁶. It is preferable that projects are managed by a Member of the IfA (MIFA). However, the suitability of the manager will be judged by the National Park Authority on their past record. The project manager will be expected to ensure that all project staff and sub-contractors are suitably qualified and experienced. The IfA’s Code of Conduct contains four underlying principles and all those involved should remember these four statements:
- a) a member shall adhere to the highest standards of ethical and responsible behaviour in the conduct of archaeological affairs;
 - b) the member has responsibility for the conservation of the historic environment;
 - c) the member shall conduct his/her work in such a way that reliable information about the past may be acquired, and shall ensure that the results be properly recorded;
 - d) the member has responsibility for making available the results of archaeological work with reasonable dispatch.

THE PLANNING PROCESS - BEFORE A PLANNING APPLICATION IS SUBMITTED

- 12.6 The National Park Authority welcomes informal discussion at pre-application stage. Applicants are advised to discuss the potential impact of their application on heritage assets in advance of submitting a planning application or General Permitted Development Order (GPDO) consultation. Mitigation strategies and assessment and evaluation techniques are best addressed early in the consultation process.

⁴⁶⁶ By-Laws: Code of Conduct – Institute for Archaeologists (last updated 08 October 2013)

ASSESSMENT AND EVALUATION

- 12.7 When a planning application is assessed by the National Park Authority (pre- or post validation of the application) there may be insufficient information available to make a reasoned decision concerning the likely effect of the proposal on any heritage assets affected, including their setting. Under Policies CE-S4 or CE-D3 an archaeological impact assessment and evaluation may be required before the application is determined. The archaeological assessment and evaluation process should be agreed in writing with the National Park Authority. It may involve either or both of the following processes:
- 12.8 *Desk –Based Assessment* - an assessment of the known/potential historic environment resource or heritage asset within a specified area/site, located on land or underwater. It consists of a collation of existing written and graphic information in order to identify the likely character, extent, quality and worth of the known or potential archaeological resource in a local, regional, national or international context as appropriate.
- 12.9 *Evaluation* - a limited programme of non-intrusive and/or intrusive fieldwork which determines the presence or absence of archaeological features, structures, deposits, artefacts or ecofacts within a specified area/site, on land or underwater. It may include trial-trenching, geophysical survey, environmental sampling and building recording.

ASSESSMENT AND EVALUATION REPORT

- 12.10 The results of the assessment and evaluation stage should be presented as a written report to the National Park Authority. The report should define the location, extent and significance of archaeological remains and other historic assets, and illustrate how these may be affected by the proposals including their setting. It is advisable to discuss the contents of the report with the National Park Authority at draft stage.

THE PLANNING PROCESS – AFTER PLANNING PERMISSION IS GRANTED PLANNING CONDITIONS

- 12.11 A planning application may be approved with archaeological conditions. This condition may overcome considerations that would otherwise have led to the application being refused. Generally archaeological work or building recording carried out through the planning process is the result of a condition. This will require the applicant to gain agreement in writing from the National Park Authority before development begins. The condition is not fulfilled until the applicant has completed the required work and has deposited a completed archaeological report with the National Park Authority and the completed archive with the appropriate museum or other agency.

THE SPECIFICATION

- 12.12 In the majority of cases the National Park Authority will require that the contractor produces a specification or *Written Scheme of Investigation (WSI)* to be agreed in writing by the National Park Authority in advance. The WSI should set out the basic requirements of the project and the standards which are to be adhered to. A brief for this can be requested from the National Park Authority.
- 12.13 The specification will be expected to:
- a) contain a reasoned discussion of the field and analytical techniques selected (see 12.9, 12.16, 12.18 and 12.19);
 - b) give details of techniques, artefact collection policies, discard policies; environmental sampling strategy and recording techniques (see 12.24-5);
 - c) explain the reasons for the rejection of a particular technique;
 - d) outline the proposed reporting procedure and the likely timetable, as well as the anticipated content of the final and any other reports (see 12.22-3);

- e) include an indication of the level and format of the archive to be produced (see 12.26);
 - f) give a timetable for obtaining the necessary consents, its preparation and deposition; and
 - g) show how the results of the project should be reported and published (see 12.22-3).
- 12.14 In addition to normal contingency provisions, the National Park Authority requires a compulsory archaeological science contingency to be included in most projects. This will normally be 15% of the total tender, but the National Park Authority may vary this rate in response to the specific potential of the project.
- 12.15 In addition to any provided brief, the points of reference for the production of the specification or WSI should be based on the advice in the National Planning Policy Framework, and guidance available from the Institute for Archaeologists (IfA), English Heritage, Arts Council England, Archaeological Archives Forum and Society of Museum Archaeologists.

HISTORIC BUILDING RECORDING

- 12.16 Archaeological building investigation and recording is a formal programme of work intended to establish the character, history, date, form and archaeological development of a structure. It may be required as part of an archaeological evaluation (prior to a planning application) to help in the determination of that application, or as part of an archaeological condition in order to record aspects of a building before and/or as development takes place. Such recording should result in the production of an ordered archive and report. The level and extent of recording will be covered within the agreed specification or WSI.

GROUNDWORKS

- 12.17 A planning condition may require a watching brief or a programme of excavations (where the archaeological information is preserved by record) agreed in advance.
- 12.18 A *watching brief* is a formal programme of observation and investigation conducted during any operation carried out for non-archaeological reasons within a specified area or site on land or underwater, where there is a possibility that archaeological deposits may be disturbed or destroyed. The programme will result in the preparation of a report and ordered archive. One of four levels of watching brief will be stipulated:
- a) A comprehensive watching brief - where archaeologists are present at all times during the groundwork operations.
 - b) An intensive watching brief – where archaeologists are on site during the undertaking of sensitive groundwork operations.
 - c) An intermittent watching brief – where archaeologists are on site to observe the groundworks after digging operations have been completed, but before construction work commences.
 - d) A partial watching brief – where observation takes place only when considered appropriate.
- 12.19 *Archaeological excavation (preservation by record)* – a programme of controlled, intrusive fieldwork with defined objectives which examines and records archaeological deposits, features and structures and, as appropriate, retrieves artefacts, ecofacts and other remains within a specified area or site (on land or underwater). The records made and objects gathered during fieldwork are studied and the results of that study published in detail appropriate to the project and in the light of findings.

REPORT SUBMISSION

12.20 The specification or WSI should define the form and content of the report. The report must be submitted to and approved by the National Park Authority before the planning condition is fulfilled. There are four broad levels of publication:

- a) *evaluation and assessment report* on the findings of a programme of work for submission in support of a planning application or as part of an archaeological condition attached to a planning permission, it should be written to address the requirements of the client and the planning authorities;
- b) *brief academic report*. A notification of the work to the archaeological community;
- c) *full academic publication* to analyse and synthesise the full implications of the fieldwork. It should be addressed to the specialist archaeological community;
- d) *popular publication* to share the results of the fieldwork with the public.

12.21 The appropriate level of publication should be set out in the specification. However, archaeological discoveries may warrant a different level of publication from that initially chosen and the final form of publication should be agreed with the National Park Authority. Three copies of the report/s should be submitted within six months of the completion of fieldwork (unless otherwise agreed in writing) or, in the case of an evaluation or assessment, with the planning application.

TREATMENT OF ENVIRONMENTAL EVIDENCE, ARCHAEOLOGICAL MATERIALS AND ARCHIVING

ENVIRONMENTAL EVIDENCE

12.22 Environmental evidence is an important element of the archaeological record. During a field evaluation an accurate assessment of the preservation of environmental evidence including animal bone, shell, waterlogged and charred organic remains, and the condition of any buried soils and sediments should be made. This assessment should be sufficiently comprehensive to allow an evaluation of its potential archaeological relevance and to enable the construction of a structured sampling strategy and post-excavation programme, should further archaeological work be required. When undertaking this work advice must be sought from an appropriate environmental consultant or from the English Heritage Regional Science Advisor. The appropriate specialists should be available or on-site to advise on environmental issues. If a mitigation strategy is to be developed the feasibility of long-term preservation upon the environmental content of the site must be considered.

TREATMENT OF ARCHAEOLOGICAL MATERIALS

12.23 Exmoor National Park Authority requires a minimum standard for the handling of artefactual material retrieved from archaeological interventions. All staff, including all sub-contracted specialists involved with a project, must be made aware of the latest guidance from the Archaeological Archives Forum, English Heritage, Institute for Archaeologists, and Society of Museum Archaeologists, and should follow current best practice. It is imperative that the implications of these documents are noted at the tendering stage, because they may have both practical and financial implications. In particular the advice of museum conservation staff will be of value when handling sensitive materials.

ARCHIVING SYSTEM

12.24 Archaeological material is normally deposited in the receiving museum for the area which has expertise and resources to provide adequately for the long-term conservation and reference of the material. The contractor should contact the museum before the commencement of fieldwork to meet the requirements for the long term storage of the subsequent archive. In exceptional circumstances if agreed that this is

not to be the case the National Park Authority and the receiving Museum will require that these standards of care and access will be met with the alternative arrangement.

ADDITIONAL CONSIDERATIONS

PUBLICITY

12.25 Exmoor National Park Authority encourages a positive approach to involving the local community and other interested parties in archaeological projects. Where possible active participation in the form of open days or school visits should be considered. In cases where projects produce locally interesting information a press release may be appropriate. Contracting or consultant units should obtain permission from the site owners prior to involving the public or media. Where appropriate, further publication of 'summary' reports should be considered for a wider public audience in the form of leaflets or booklets.

LEGAL AND ETHICAL CONSIDERATIONS

12.26 Legal and ethical factors must be considered when undertaking archaeological fieldwork. These relate particularly (but not exclusively) to human remains and treasure (Treasure Act 1996 and associated Code of Practice).

- a) All unexpected human remains encountered must be left *in situ* and suitably protected from deterioration. All finds of human remains should be reported to the Police and the Coroner's Office. If removal is necessary and unavoidable it must be carried out in compliance with the statutory provisions of the Burial Act 1857 and subsequent legislation and after obtaining a licence for exhumation from the Home Office. The excavator must comply with the conditions of the licence as well as other Home Office and environmental health regulations. All reasonable requests as to the method of removal, re-interment or disposal of the remains and/or associated items should be complied with. The simplest way to safeguard remains that are not to be excavated is by sensitive back-filling as soon as possible.
- b) Finds of treasure (as defined) must be archaeologically recorded and removed to a safe place and reported to the local Coroner within 28 days in accordance with the procedures of the Treasure Act 1996 and Code of Practice. If removal of such finds is not possible on the same day then adequate security arrangements must be made.
- c) Archaeological contractors will be expected to act in accordance with the wishes of the site owner/agent and local residents. They should follow access and office procedures on development sites as well as behaving appropriately as far as noise and other factors are concerned.
- d) Adherence to the Museum Association's Code of Ethics is expected in relation to the management of the archive and associated information.
- e) Finds from the foreshore (regardless of age and importance) are subject to the requirements of the Merchant Shipping Act 1995.

NOTIFICATION

12.27 In order for effective monitoring of archaeological projects, Exmoor National Park Authority and the intended recipient of the archive should be notified prior to the commencement of work to a timescale agreed within the WSI. The letter should contain basic information including:

- a) site name and address;
- b) planning application number (if relevant);
- c) start date of work;
- d) name of project officer;
- e) specialists being used.

The National Park Authority should be notified in writing, and agreement sought prior to any changes.

HEALTH AND SAFETY

12.28 The health and safety of all those involved in every archaeological project is paramount. Archaeologists are expected to operate in accordance with current health and safety legislation and industry regulations. At all times health and safety must take priority over archaeological matters.

INSURANCE

12.29 The IfA Code of Conduct stipulates that a member shall ensure that adequate insurance cover is maintained for persons or property which may be affected by his or her archaeological activities. It is also possible for developers to insure against the consequences of an unexpected discovery, for example a find requiring expensive conservation, provided sufficient evaluation has been previously undertaken.

SOURCES OF INFORMATION

DCLG (March 2012), *National Planning Policy Framework*, The Stationery Office, London
Brown, D.H., (2007) *Archaeological Archives - a guide to best practice in creation, compilation, transfer and curation*, Institute for Archaeologists on behalf of the Archaeological Archives Forum
Watkinson D and Neal V (2001) *First Aid for Finds*, RESCUE/United Kingdom Institute of Conservators

Current guidance documents available from:

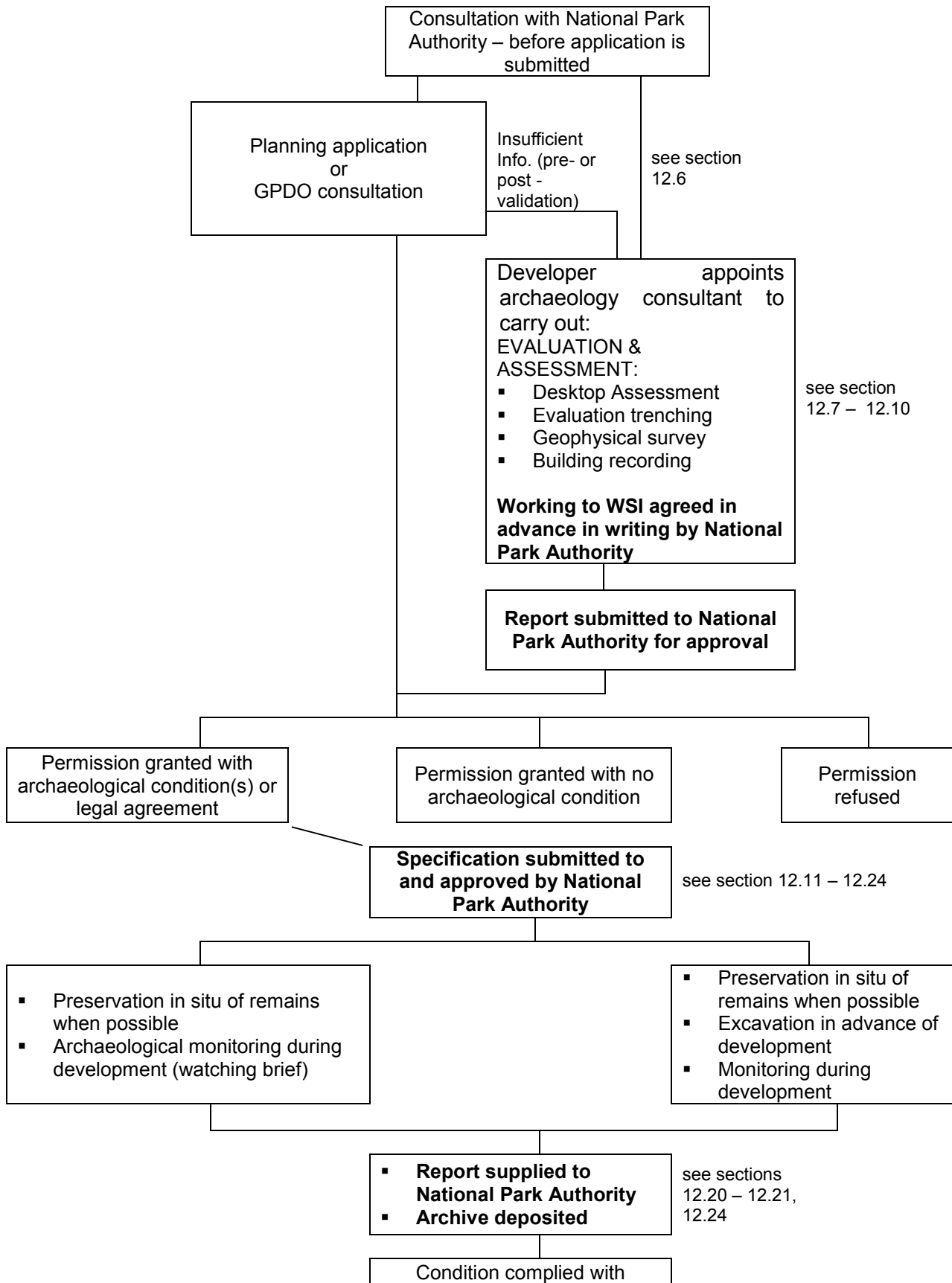
English Heritage
Institute for Archaeologists
Archaeological Archives Forum
Society of Museum Archaeologists

ACKNOWLEDGEMENT

The original version of this document was derived from Somerset County Council's *Archaeological Manual*.

Table 12.1

THE HISTORIC ENVIRONMENT AND THE PLANNING PROCESS



13. ANNEX 2: RURAL LAND BASED WORKER DWELLINGS

- 13.1 Traditional farming and woodland management have helped to create Exmoor's distinctive landscape. Sustainable agriculture and forestry are essential for maintaining the characteristic landscapes of the National Park, can play an important role in helping to manage and enhance Exmoor's wildlife and the environment, and are major contributors to the local economy.
- 13.2 This Annex provides additional information and guidance in relation to the following policies:
- a) HC-D7 Conversions to Dwellings in the Open Countryside
 - b) HC-D8 New Build Dwellings in the Open Countryside
 - c) HC-D9 Rural Workers
 - d) HC-D11 Residential Caravans
- 13.3 Policy HC-D10 'Succession Farming – Second Dwellings on Established Farms' provides for a second dwelling on established farms that are financially sustainable where the criteria for a full time worker cannot be fully satisfied. This Annex will be applied in the case of applications under Policy HC-D10 save for paragraph 13.8(b) of this Annex which requires that the need relates to a full-time worker, primarily employed in a rural land-based activity and does not relate to a part-time requirement and paragraphs 13.19 and 13.20 which relate to 'temporary rural land-based worker dwellings' since succession dwellings will only be considered on established farms.
- 13.4 These policies and Annex 2, are based on long tested methodology which is considered to be an appropriate way to approach "the essential need for a rural worker to live permanently at or near their place of work in the countryside"⁴⁶⁷ in terms of proposals for new dwellings in the open countryside. Additionally, the NPPF recognises that National Parks are areas where development should be restricted⁴⁶⁸. It states that great weight should be given to conserving landscape and scenic beauty in National Parks which have the highest status of protection in relation to landscape and scenic beauty while the conservation of wildlife and cultural heritage are important considerations and should be given great weight.
- 13.5 The NPPF states that isolated new houses in the countryside should be avoided unless there are special circumstances. One of the few circumstances in which isolated residential development may be justified is when accommodation is required to enable the essential need for a rural worker to live permanently at or near their place of work in the countryside⁴⁶⁹. Nevertheless, it will often be possible, as convenient and more sustainable for such workers to live in settlements, suitable existing dwellings, or by reusing/converting a suitable existing building on the holding or nearby within an established building group, so avoiding new and potentially intrusive development in the open countryside. However, there will be some cases where the nature and demands of the work concerned make it essential for one or more people engaged in a rural land-based enterprise to live at, or very close to, the site of their work. Whether this is essential in any particular case will depend on the needs of the enterprise concerned and not on the personal preferences or circumstances of individuals
- 13.6 Given the concession that the planning system makes for new occupational dwellings in the countryside, it is essential that all applications for planning permission for such dwellings in the countryside are scrutinised thoroughly so that only genuine proposals are approved. In particular, it will be important to establish whether the stated intentions

⁴⁶⁷ DCLG (2012) National Planning Policy Framework (Paragraph 55). Department of Communities and Local Government

⁴⁶⁸ Ibid (Paragraph 14 footnote 9)

⁴⁶⁹ Ibid (Paragraph 55)

to engage in agriculture, forestry or any other rural land-based enterprise, are genuine, are reasonably likely to materialise and are capable of being sustained for a reasonable period of time. It will also be important to establish that the needs of the intended enterprise require one or more of the people engaged in it to live nearby.

- 13.7 A 'rural land-based enterprise/activity' is considered to include agriculture, forestry, and other land-based enterprise/activity which requires a location in the open countryside and obtains their primary inputs from the land holding they intend to be based at to sustain the business. Policy HC-D9 reflects National Park designation and states that the enterprise shall be extensive in nature, to ensure that the natural beauty and wildlife of the National Park is conserved and unacceptable adverse environmental impacts that can arise from more intensive forms of agriculture are avoided. Intensive activities, especially those that could be located in any location, will not be considered favourably under these policies.

PERMANENT RURAL LAND-BASED WORKER DWELLINGS

- 13.8 New permanent dwellings will only be allowed where they are required to support existing agricultural, forestry or other rural land-based activities on well-established land holdings. Applicants should provide a detailed independently prepared appraisal to accompany any application for a new rural worker's dwelling. The appraisal should provide information relating to the following points:
- a) there is a clearly established *existing* functional need (see paragraph 13.9 below);
 - b) the need relates to a *full-time* worker, primarily employed in a rural land-based activity and does not relate to a part-time requirement;
 - c) the holding and the activity concerned have been established for at least three years, have been profitable for at least one of them, are currently financially sound, and have a clear prospect of remaining so (see paragraph 13.13 below);
 - d) the functional need cannot be fulfilled by another existing dwelling on the unit (or the subdivision of an existing dwelling (see policy HC-D14 Subdivision of Existing Dwellings) any other existing accommodation in the area which is suitable and available for occupation by the workers concerned, or through the conversion/change of use of an existing building on the holding; and
 - e) other planning requirements, including in relation to access, or impact on the countryside, are satisfied.
- 13.9 A *functional test* is necessary to establish whether it is essential for the proper functioning of the enterprise for one or more workers to be readily available at most times. Such a requirement might arise, for example, if workers are needed to be on hand day and night:
- a) in case animals or agricultural processes require essential care at short notice;
 - b) to deal quickly with emergencies that could otherwise cause serious loss of crops or products, for example, by frost damage or the failure of automatic systems.
- 13.10 In cases where the National Park Authority is particularly concerned about possible abuse, the history of the holding will be investigated to establish the recent pattern of use of land and buildings and whether, for example, any dwellings, or buildings suitable for conversion to dwellings, have recently been sold separately from the holding concerned either by the present applicant or previous owners. Such a sale could constitute evidence of lack of need for a new permanent dwelling for a rural worker.
- 13.11 The protection of livestock or other animals associated with the rural land-based enterprise from theft or injury by intruders may contribute on animal welfare grounds to the need for a new rural worker dwelling, although it will not by itself be sufficient to justify one. Requirements arising from food processing, as opposed to agriculture for example, cannot be used to justify a rural worker dwelling. Nor can agricultural needs

justify the provision of isolated new dwellings as retirement homes for farmers; such a need may be met under policy HC-D10 Succession Farming – Second Dwellings on Established Farms. Under conventional methods of forestry management, which can involve the use of a peripatetic workforce, new forestry dwellings may not always be justified.

- 13.12 If a functional requirement is established, it will then be necessary to consider the number of workers needed to meet it, for which the scale and nature of the enterprise will be relevant.
- 13.13 New permanent accommodation cannot be justified on the grounds of a rural land-based enterprise unless the enterprise is economically viable. A *financial test* is necessary for this purpose, and in applying this test (see paragraph 13.8(c) above), the National Park Authority will take a realistic approach to the level of profitability, taking account of the nature of the enterprise concerned. Some enterprises which aim to operate broadly on a subsistence basis, but which nonetheless provide wider benefits (e.g. providing ecosystem services and contributing to the conservation or enhancement of the natural beauty and wildlife of the National Park), can be sustained on relatively low financial returns.
- 13.14 The appraisal of functional requirement and financial viability should be confined to a factual statement of the agricultural, or other rural land-based business considerations involved and an evaluation of the specific points on which advice is sought; no recommendation for or against the application should be made. The evidence presented to prove the viability of a rural land-based enterprise will vary according to the type of enterprise and will depend upon the structure of the holding, tenure, the nature of the enterprise and how it is financed. It is considered that in terms of an agricultural enterprise, information on costs of stock, feed, vet care, transport, marketing, electricity, insurance, accountants, water charges, repairs, land rent and financing charges would be taken into account.
- 13.15 The statement should detail land in the applicant's ownership and land within a permanent agricultural tenancy separately from any other land that may be rented on a short term basis. The National Park Authority will base its assessment of the proposal only on land under the applicant's ownership or land held in a longer term tenancy and therefore a dwelling is unlikely to be permitted where the financial viability of a rural land-based enterprise depends upon an insecure or short term tenancy or where a significant proportion of land/buildings identified as part of the functional holding is rented.
- 13.16 The National Park Authority will duly consider the statement, all other evidence available, and may also procure additional advice from a qualified consultant prior to determining the application.
- 13.17 Rural worker dwellings should be of a size commensurate with the established functional requirement. Policy HC-D9 requires that the net floorspace will be 90sqm or less unless the Authority is satisfied that the needs of the holding require a larger dwelling. Larger dwellings should be of a size commensurate with the needs of the holding, and should not be expensive to construct in relation to the income it can sustain in the long-term. It is the requirements of the enterprise, rather than those of the owner or occupier, that are relevant in determining the size of a dwelling larger than 90sqm net internal floorspace.
- 13.18 Rural worker dwellings should be sited so as to function and operate as part of the holding in conjunction with and well-related to existing farm buildings on the holding (or other dwellings) so that it cannot be easily separated from the holding.

TEMPORARY RURAL LAND-BASED WORKER DWELLINGS

- 13.19 If a new dwelling is essential to support a new rural land-based activity, whether on a newly-created holding or an established one, it should normally, for the first three years, be provided by a caravan, a wooden structure which can be easily dismantled, or other temporary accommodation as set out under policy HC-D11 Residential Caravans. It should satisfy the following criteria:
- a) clear evidence of a firm intention and ability to develop the enterprise concerned (significant investment in new farm buildings is often a good indication of intentions);
 - b) functional need (see paragraph 13.9 of this Annex);
 - c) clear evidence that the proposed enterprise has been planned on a sound financial basis;
 - d) the functional need cannot be fulfilled by subdivision of an existing dwelling, another existing dwelling on the unit, or any other existing accommodation in the area which is suitable and available for occupation by the workers concerned; and
 - e) other normal planning requirements, e.g. on siting and access, are satisfied.
- 13.20 If permission for temporary accommodation is granted, permission for a permanent dwelling will not subsequently be given unless the criteria in paragraph 13.8 above are met. The National Park Authority will ensure that conditions are attached to any planning permission to state the period for which the temporary permission is granted, the fact that the temporary dwelling will have to be removed, and the requirements that will have to be met if a permanent permission is to be granted. Successive extensions to a temporary permission over a period of more than three years will not normally be granted, nor will temporary permissions be granted in locations where a permanent dwelling would not be permitted.

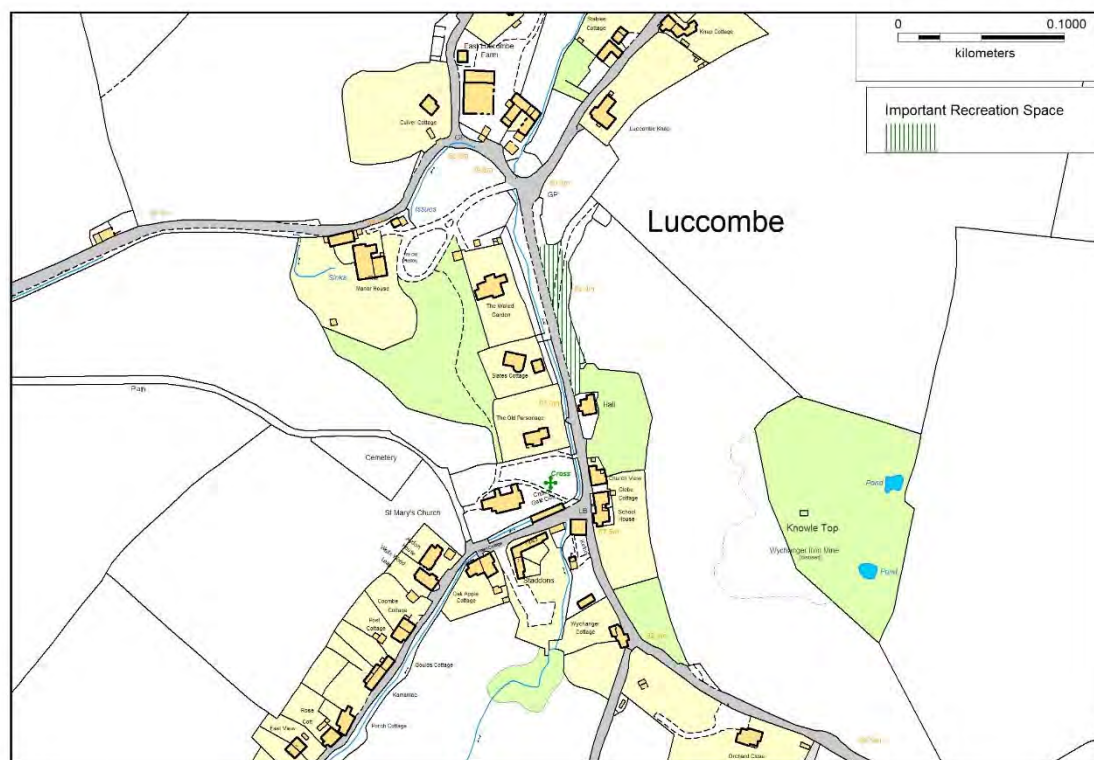
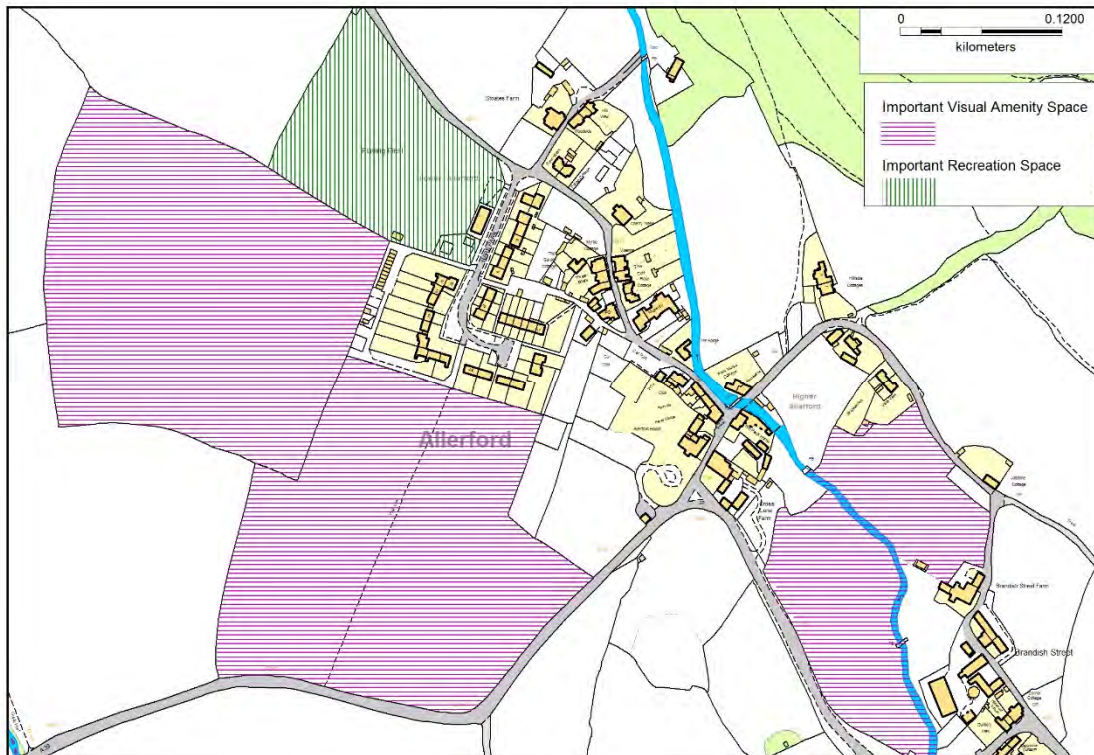
OCCUPANCY CONDITIONS

- 13.21 Planning permissions for a rural land-based dwelling will be subject to conditions and planning obligations.
- 13.22 Where the need to provide accommodation to enable farm, forestry or other rural land-based workers to live at or near their place of work has been accepted as providing the special justification required for new, isolated residential development in the countryside, it will be necessary to ensure that the dwellings are kept available for meeting this need. For this purpose planning permission will be made subject to an occupancy restriction. Similar occupancy restrictions may also be attached to any existing dwelling on the holding, under the control of the applicant, where a new rural worker's dwelling is granted planning permission. A planning obligation may be used in exceptional circumstances to tie the dwelling to the holding to prevent them being sold off separately in the future without further application to the National Park Authority to vary the terms of the obligation. If these circumstances arise, the applicant should demonstrate that there are reasonable and valid grounds for doing so.
- 13.23 Changes in the scale and character of rural land-based enterprises may affect the longer-term requirement for dwellings for which permission has been granted subject to an agricultural/forestry or a rural worker occupancy condition. Should such dwellings, and others in the open countryside, become vacant or no longer required, policy HC-D12 Replacement of Rural Workers Occupancy Conditions sets out the requirements for the removal of a condition or variation of a planning obligation that limits the occupancy of a dwelling to a rural worker.
- 13.24 Where conditions are attached or a planning obligation is used to control the occupancy of the rural worker dwelling these mechanisms will enable a rural worker

working or last working in a rural land-based enterprise in the locality or a widow/widower of such a person and any resident dependants to live in the dwelling. Whilst the functional and financial tests for a new dwelling related to a rural land based enterprise are required to establish the need for a new dwelling in the open countryside subsequent occupiers will also need to meet the requirements of the occupancy condition. The definition of a rural worker is set out in policy HC-D9 Rural Workers and paragraph 13.7 and in terms of subsequent occupiers of existing rural worker dwellings, this can include workers that actively contribute to the management of Exmoor's landscape such as agricultural contractors that may provide services for a number of farm businesses on Exmoor.

14. ANNEX 3: IMPORTANT OPEN SPACE IN ALLERFORD AND LUCCOMBE

14.1. The following maps illustrate areas of important open space for recreation and visual amenity within the settlements of Allerford and Luccombe. These settlements are not within the settlement hierarchy listed in policy GP3 Spatial Strategy and therefore are not represented on the Policies Map and associated Inset Maps.



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15. GLOSSARY

Term	Definition
Advertisement	Any word, letter, model, sign placard, board, notice, awning, blind, device or representation, where illuminated or not used wholly or partly for advertisement, announcement or direction any hoarding or similar structure and anything else used, designed or adapted for use for the display of advertisements.
Affordable housing	<p>Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households.</p> <p>Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority.</p> <p>Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).</p> <p>Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.</p> <p>Homes that do not meet the above definition of affordable housing, such as “low cost market” housing, may not be considered as affordable housing for planning purposes.</p>
Biodiversity	The variety of life on earth, and is used here to refer to the diversity of wildlife and habitats found on Exmoor.

Term	Definition
Biosphere Reserve	A designation by the United Nations Educational, Scientific and Cultural Organisation (UNESCO) which identifies an area of world class natural value that demonstrates the best example of people working in harmony with nature for the benefit of all.
Brownfield land	Also known as previously developed land. Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.
Climate change adaptation	Adjustments to natural or human systems in response to actual or expected climatic factors or their effects, including from changes in rainfall and rising temperatures, which moderate harm or exploit beneficial opportunities.
Climate change mitigation	Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.
Coastal Change Management Area (CCMA)	An area identified in Local Plans as likely to be affected by coastal change (physical change to the shoreline through erosion, coastal landslip, permanent inundation or coastal accretion).
Community facilities	A wide range of local facilities and services accessible to members of the public including schools, libraries, local shops, healthcare facilities, places of worship, meeting halls, public houses, sports facilities and public open spaces.
Community Infrastructure Levy (CIL)	A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area to fund the infrastructure needed to support development such as sporting and recreational facilities, open spaces, schools and other educational facilities, medical centres, transport infrastructure and flood defences.

Term	Definition
Cumulative landscape effects	The effects of a proposal on the landscape fabric, character and quality and so concerns the degree to which the development becomes a significant or defining characteristic of the landscape, a feature in particular views, and the effect this has upon the people experiencing them.
Curtilage	The extent of the land around a property (particularly a dwelling) that often, but not always delineates the amount of land associated with the property. For larger, particularly country properties, the curtilage will only refer to an immediate cultivated garden and associated forecourt, rather than any other land included within the overall 'planning use'.
Development Plan	This includes adopted Local Plans and neighbourhood plans and is defined in section 38 of the Planning and Compulsory Purchase Act 2004.
Designated heritage assets	Heritage assets formally designated through legislation including Conservation Areas, Listed Buildings, Scheduled Monuments, and Historic Parks and Gardens.
Duty to co-operate	A requirement of the Localism Act for public bodies (such as neighbouring local planning authorities) to co-operate in the preparation of their plans and strategies.
Ecosystems	Environments consisting of all living things in a particular area and the non-living things with which they interact such as soil, air, water and sunlight.
Ecosystem services	The benefits people obtain from nature often referred to as ecosystems. These include provision of natural resources such as food, water, and fuel; regulation by natural systems including clean water and air, fertile soils, flood control and climate regulation; cultural services such as recreation, and cultural heritage, and the basic infrastructure of life including soil formation, the water cycle and nutrients, fixation of carbon by plants and the ecosystems themselves.
Employment Land Review	Analysis of the demand for employment land and premises over the Plan period, a review of the quality and suitability of existing employment sites, and assessment of the need for additional employment land over this period.
Exmoor Route Network	A hierarchy of routes identified in the Local Plan for different types and modes of travel.

Term	Definition
Extended family dwelling	The provision of homes for close family members through the conversion of existing buildings either on farmsteads or within the curtilage of existing dwellings in the named settlements. Either the occupants of the existing dwelling or those of the new extended family dwelling should have a 10 year local connection.
Flood Risk	Identified probability of flooding from any water sources including fluvial, tidal, surface and ground water flooding.
Green infrastructure	A network of protected sites, nature reserves, green spaces and greenway linkages. The linkages include river corridors and flood plains, migration routes and features of the landscape, which are of importance as wildlife corridors. Green Infrastructure should provide for multi-functional uses i.e. wildlife, recreational and cultural experience, as well as delivering ecological services, such as flood protection and micro climate control.
Habitats Regulations Assessment (HRA)	A legal requirement to assess the impact of plans and proposals on the nature conservation importance of designated European habitats.
Heritage assets	Identified buildings, sites or landscape having a degree of historic significance due to their heritage interest, whether formally designated or not.
Heritage Coast	Defined in the National Planning Policy Framework as areas of undeveloped coastline which are managed to conserve their natural beauty and, where appropriate, to improve accessibility for visitors.
Historic environment	All aspects of the environment resulting from the interaction between people and places through time, including all surviving remains of past human activity, whether visible, buried or submerged, including landscape and planted flora and fauna.
Housing Market Area (HMA)	Geographic areas defined by household demand and preferences for housing. They reflect the key functional linkages between places where people live and work.
Infrastructure	A collective term for services such as roads, electricity, sewerage, water, schools, health facilities and types of green infrastructure.
Infrastructure Delivery Plan (IDP)	Sets out the critical infrastructure that is required to support the objectives, policies and spatial strategy set out in the Local Plan.
Landscape character type	A defined geographical zone with distinct types of landscape that are relatively homogeneous in character.
Landscape character area	Single unique areas within landscape character types which have their own individual character and identity.

















Term	Definition
Landscape sensitivity	The degree to which a particular landscape character type or area can accommodate change without unacceptable detrimental effects on character.
Local Service Centres (LSCs)	Exmoor's largest settlements which, although they are rural with small populations relative to areas outside the National Park, function as locally important rural service centres and are the most suitable locations in principle for new development of a scale that does not harm their form, setting and character.
Local Green Space	The designation of locally important green space for special protection, ruling out development other than in exceptional circumstances. Local Green Space is designated when a local or neighbourhood plan is prepared and reviewed. It must be reasonably close to the community it serves; have demonstrable local significance and interest; be local in character and not cover an extensive tract of land.
Local needs affordable housing	Affordable housing (see definition above) which is intended to meet the needs of the local community. On Exmoor this includes a local connection to the National Park through residency and includes people who need to live close to their place of work.
Local Wildlife Sites (LWS)	(Also known as County Wildlife Sites) identified for their wildlife interest, which complement the network of nationally and internationally designated sites. These include important species-rich grassland, ancient woodland, heath and freshwater habitats of high quality or recognised because they support species of conservation importance.
Material considerations	Any consideration relevant to the use and development of land and which is taken into account in determining a planning application.
National Nature Reserve (NNR)	Designated for their nature conservation or geological interest, with the aim of providing opportunities for the public to enjoy and experience these interests.
National Planning Policy Framework (NPPF)	The Government's planning policies for England and how they should be applied.
Neighbourhood Plans	Community-led development plans prepared by parish and town councils for particular neighbourhoods, in general conformity with the strategic policies of this local plan, to shape future development in a local community, being supported by the majority of the neighbourhood in a local referendum.













Term	Definition
Open Space	All space of public value, including public landscaped areas, parks, allotments and playing fields, and also including, not just land, but also areas of water, such as rivers, lakes and reservoirs, which offer opportunities for sport and recreation or can act as visual amenity. Safeguarded open space is defined on the Policies Map as Important Open Space for Recreation, and Important Visual Amenity Space
Planning Obligation	A legal agreement or undertaking under Section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal. Planning obligations provide a means of ensuring that developers contribute towards the infrastructure and services that are necessary to facilitate proposed development or infrastructure and enhancements required to make the development acceptable. They can be used tie the occupancy of affordable housing. The use of Section 106 Agreements is affected by the Community Infrastructure Levy Regulations.
Planning Policy Guidance (PPG)	The Government's planning guidance for new development that supports and informs the National Planning Policy Framework (NPPF) and how these policies are expected to be applied.
Policies Map (formerly proposals map)	A map showing the areas or sites to which local plan policies and proposals apply. It will contain Inset Maps, showing particular areas in more details.
Principal residence housing	A form of market housing controlled by a mechanism which ensures it can be lived in by anyone but only as their principal residence. The aim of this mechanism is to prevent any new market housing being used as a second or holiday home.
Regionally Important Geological Site (RIGS)	Local, non-statutory sites identified for their geological and geomorphological interest.
Rural exception sites	Defined in the NPPF as small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. Small numbers of market homes may be allowed at the local authority's discretion, for example where essential to enable the delivery of affordable units without grant funding. In the National Park, these market houses will be principal residence homes.

Term	Definition
Rural land based enterprises	Land based businesses operating in the open countryside, such as agriculture, forestry, associated farm diversification activities or enterprise that actively contribute to the management of the land.
Rural workers	People whose place of work is located within the countryside, typically comprising full time agricultural workers, forestry workers and others involved in rural land-based enterprises.
Section 3 Land	On Exmoor these are areas of moor and heath, woodland, cliff and foreshore identified by the National Park Authority as being of particular natural beauty and designated under the Wildlife and Countryside (Amendment) Act 1985.
Sequential visual effects	The recurrence of developments when moving through a landscape and how these are experienced along transport routes, public rights of way and access land.
Shoreline Management Plan (SMP)	A plan providing a large scale assessment of the risk to people and to the developed, historic and natural environment associated with coastal processes.
Sites of Special Scientific Interest (SSSI)	SSSIs are the country's very best wildlife and geological sites. They are important as they support plants and animals that find it more difficult to survive in the wider countryside. The protection of SSSIs is a shared responsibility between landowners, local authorities and Natural England.
Special Areas of Conservation (SAC)	Areas given special protection under the European Union's Habitats Directive, which is transposed into UK law by the Habitats and Conservation of Species Regulations 2010.
Special qualities of the National Park	Identified by the National Park Authority in the National Park Management Plan (the Exmoor National Park Partnership Plan) setting out the distinctive quality of the National Park's landscape, wildlife, cultural heritage, wildness, tranquillity, and dark night skies and people's understanding and enjoyment of these.
Specialist Housing	Housing for older and more vulnerable members of the community with a 10 year local connection that can be provided as affordable housing or as part of a wider scheme to deliver affordable housing and where there is evidence of a local need for it.
Statement of Community Involvement (SCI)	A statement within the Local Development Framework that sets out the Council's policies for public involvement in the preparation of Local Development Documents and planning applications.





Term	Definition
Strategic Flood Risk Assessment (SFRA)	An assessment of risks from all forms of flooding to guide the location of development.
Strategic Housing Land Availability Assessment (SHLAA)	A technical document agreed by a Stakeholder Panel that assesses the suitability and achievability of potential sites for future housing provision
Strategic Housing Market Assessment (SHMA)	A study into the long term housing demand, supply and needs of a Housing Market Area.
Sustainability Appraisal (SA)	The process used to ensure that the principles of sustainable development are considered in the preparation of planning policy documents. The SA includes the requirements of the European Directive on Strategic Environmental Assessment to avoid unnecessary duplication. Together they will play an important part in testing the soundness of the Local Plan.
Supplementary Planning Document (SPD)	A document that sets out more detailed policies in support of those contained in a local plan. It does not form part of the Development Plan, but is a material consideration on planning applications.
Sustainable development	Development which meets the needs of the present without compromising the ability of future generations to meet their own needs.
Sustainable drainage Systems (SUDs)	SUDs are designed to control the quantity of runoff from a development to reduce flood risk, to improve the quality of the run off, and to enhance the nature conservation, landscape and amenity value of the sites surroundings.
Sustainable tourism	Any form of development, management or tourist activity which ensures the long term protection and preservation of natural, cultural and social resources and contributes in a positive and equitable manner to the economic development and well-being of individuals living, working or staying in protected areas.
Traditional building	Older buildings of solid wall construction built of natural and often local materials. On Exmoor these usually predate World War II.
Travellers	Defined in the National Planning Policy for Traveller Sites; the collective name for 'gypsies and travellers' and 'travelling show people'.
Villages	Smaller than Local Service Centres with a number of services and facilities which act as focal points for people living across Exmoor.
Water Framework Directive (WFD)	European Union legislation that requires all countries throughout the EU to manage the water environment to consistent standards.

Inset Map Legend

-  Site of Special Scientific Interest
-  Special Areas of Conservation - Exmoor Heaths
-  Special Area of Conservation - Exmoor & Quantock Oak Woodlands
-  Local Wildlife Site
-  Regionally Important Geological Site
-  Regionally Important Geological Site
-  Section 3 - Cliff and Foreshore
-  Section 3 - Woodland
-  Section 3 - Moor and Heath
-  Tree Preservation Order - Woodland
-  Tree Preservation Order - Tree
-  Veteran Tree
-  Orchard of Landscape Importance
-  Groundwater Source Protection Zones
-  Historic Parks and Gardens
-  Listed Buildings

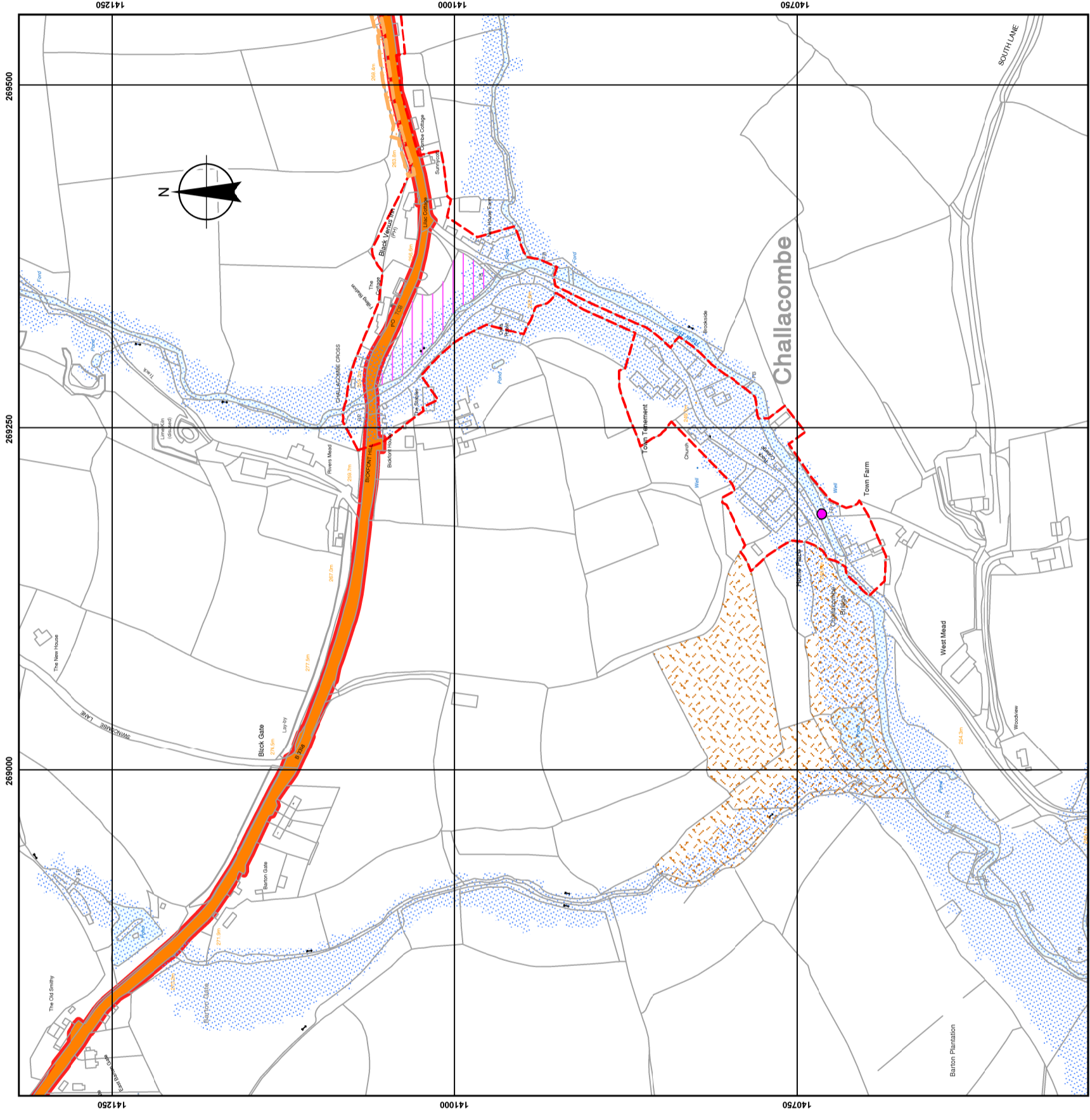
-  Scheduled Monuments
-  Conservation Area
-  Historic Settlement Core
-  Important Open Space - Recreation
-  Important Visual Amenity Space
-  Community Safeguarding Areas
-  Heritage coast
-  Coastal Change Management Area
-  Flood Zones - 2 and 3 Combined
-  Water Bodies
-  Route of the Lynton to Barnstaple railway (dismantled)
-  Route of the West Somerset Mineral Line (dismantled)

Exmoor Route Network

-  A Roads
-  B road and Access route
-  County Freight route
-  Local Freight route

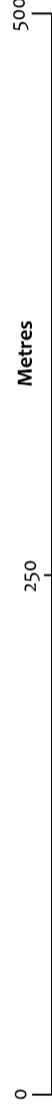
DISCLAIMER

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

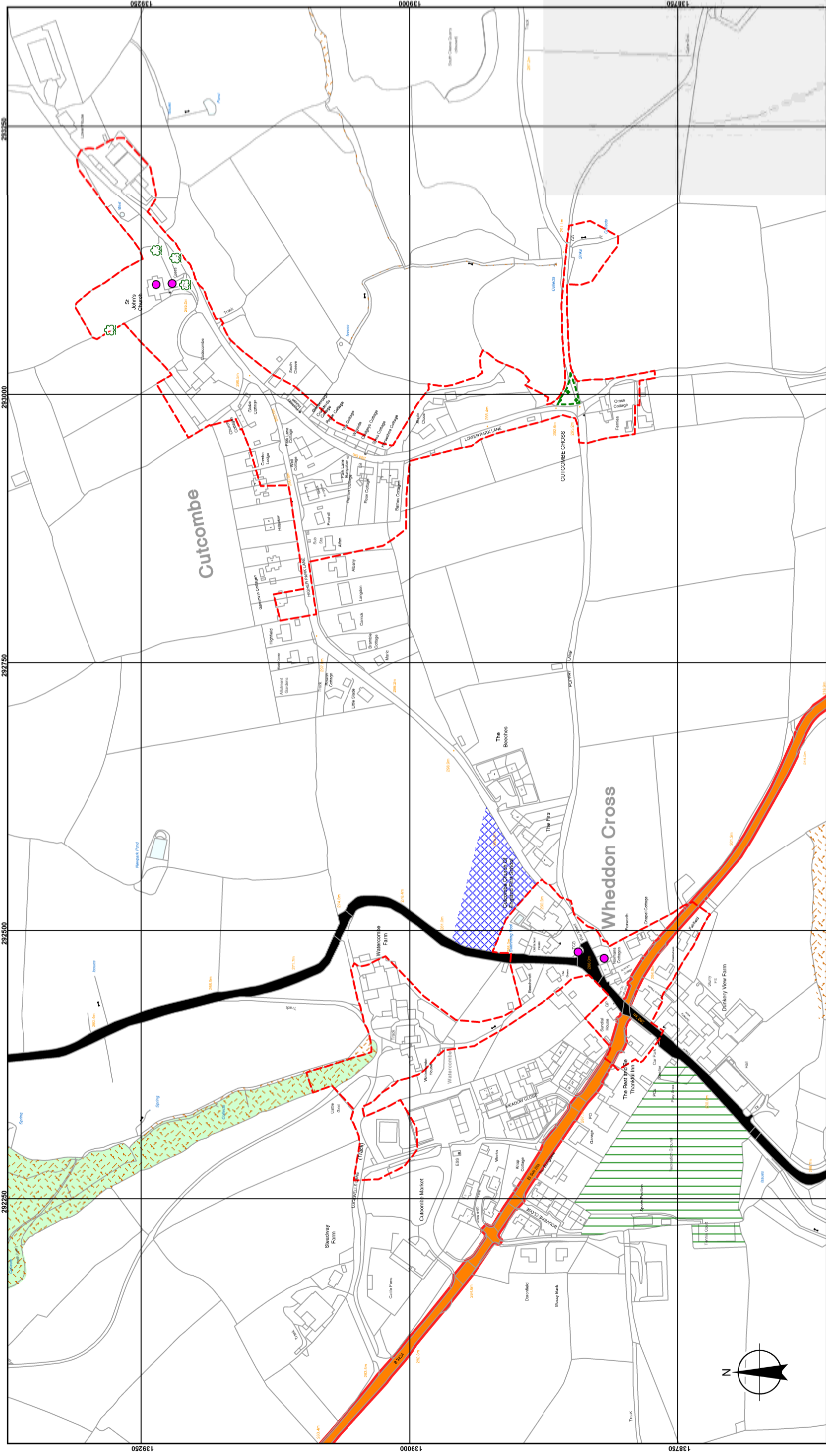


Exmoor National Park Publication Draft Local Plan
(including minerals and waste policies) 2011 - 2031

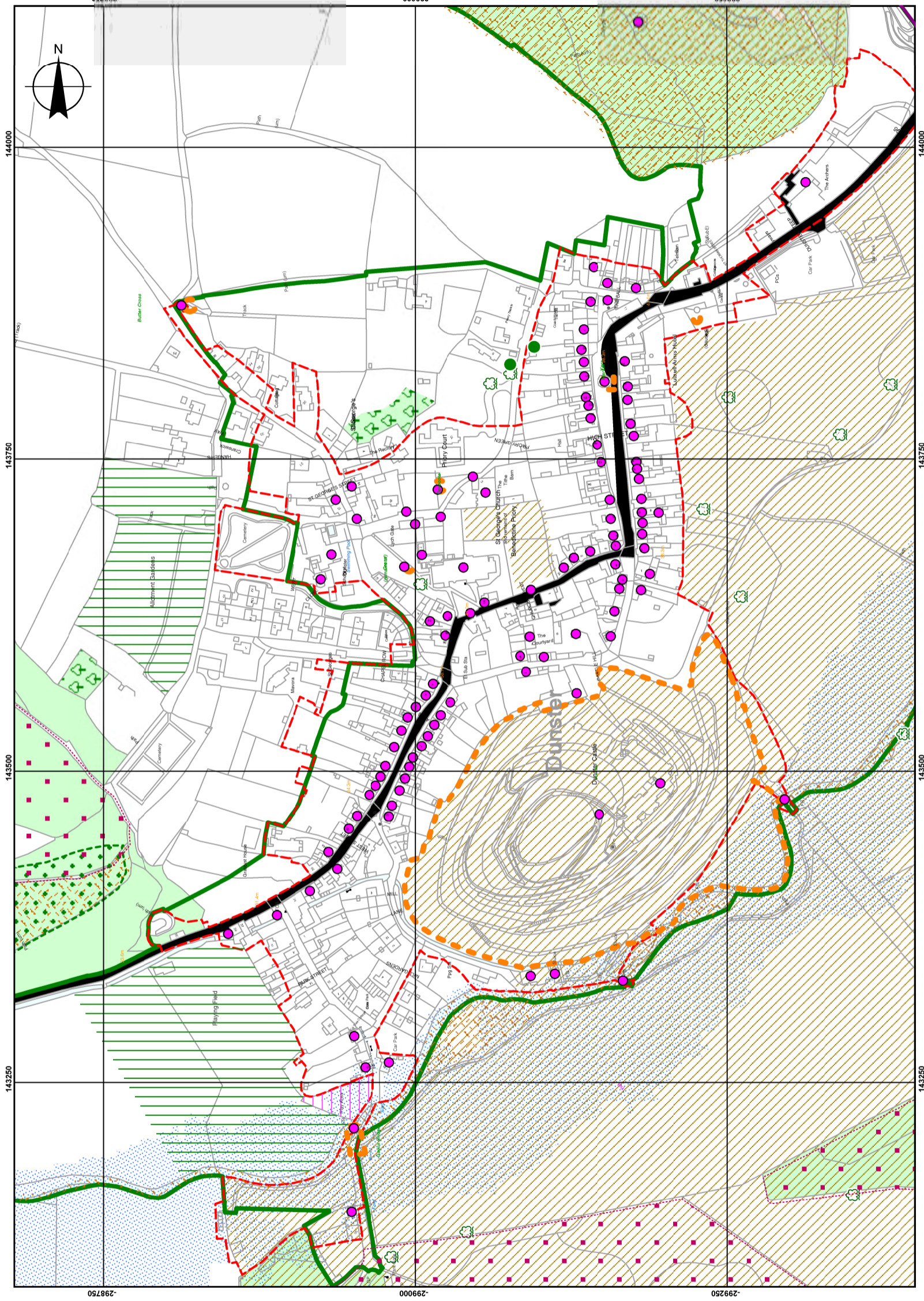
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**Challacombe
Inset Map 5**



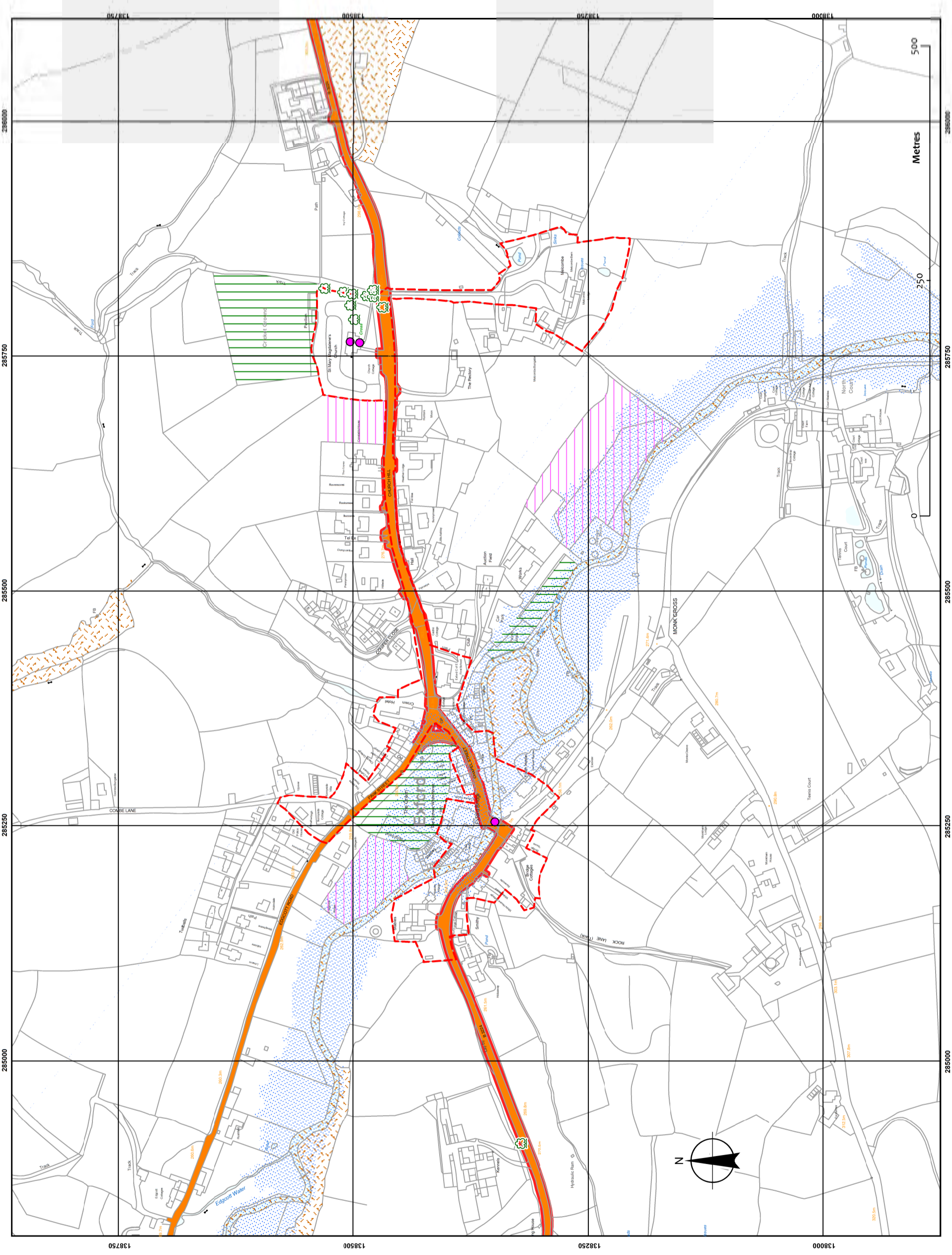
**Cutcombe and Wheddon Cross
Inset Map 6**



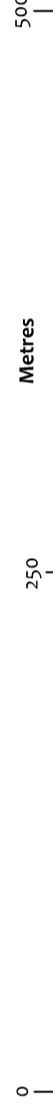
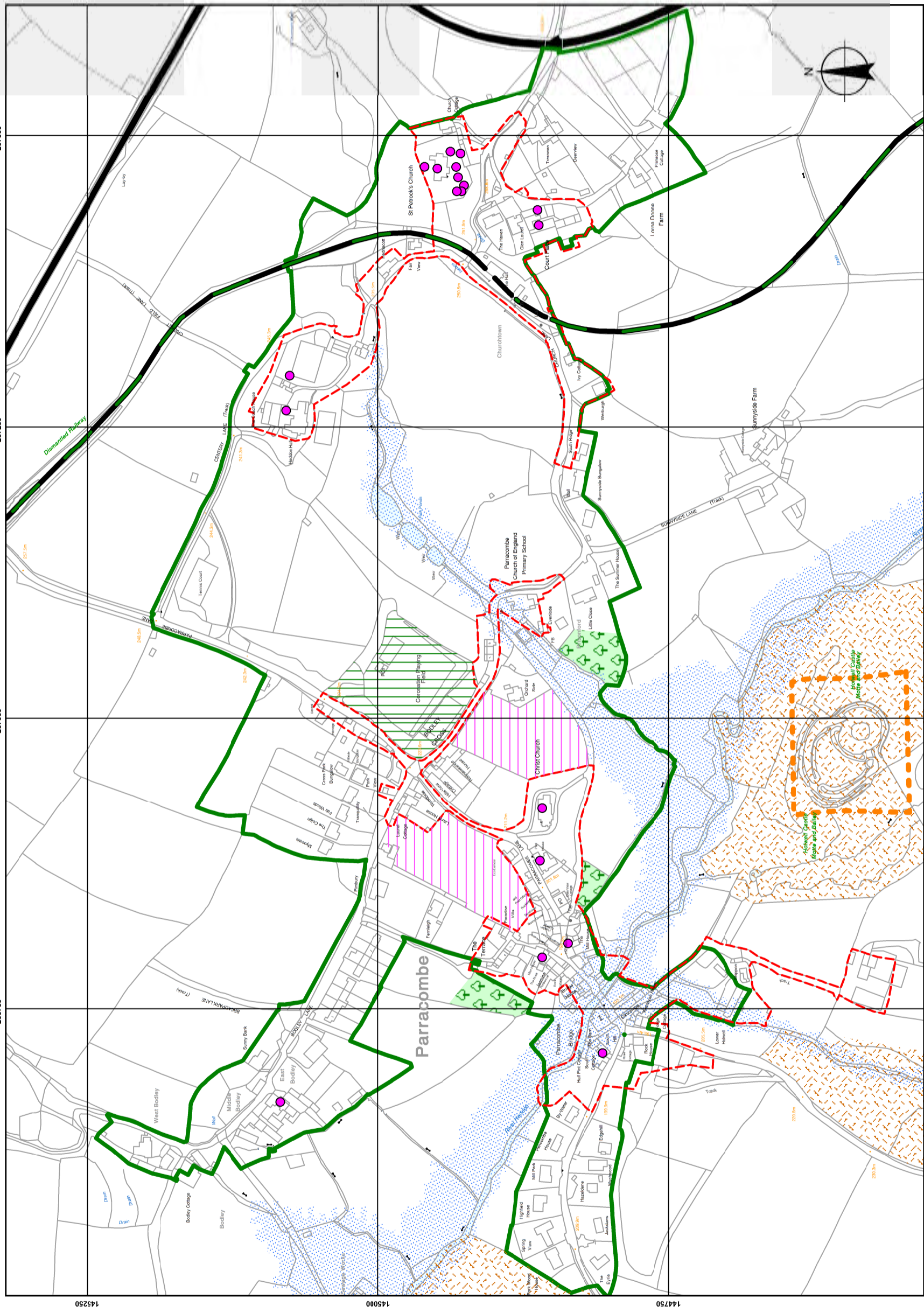
Exmoor National Park Publication Draft Local Plan
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**Dunster
Inset Map 8**

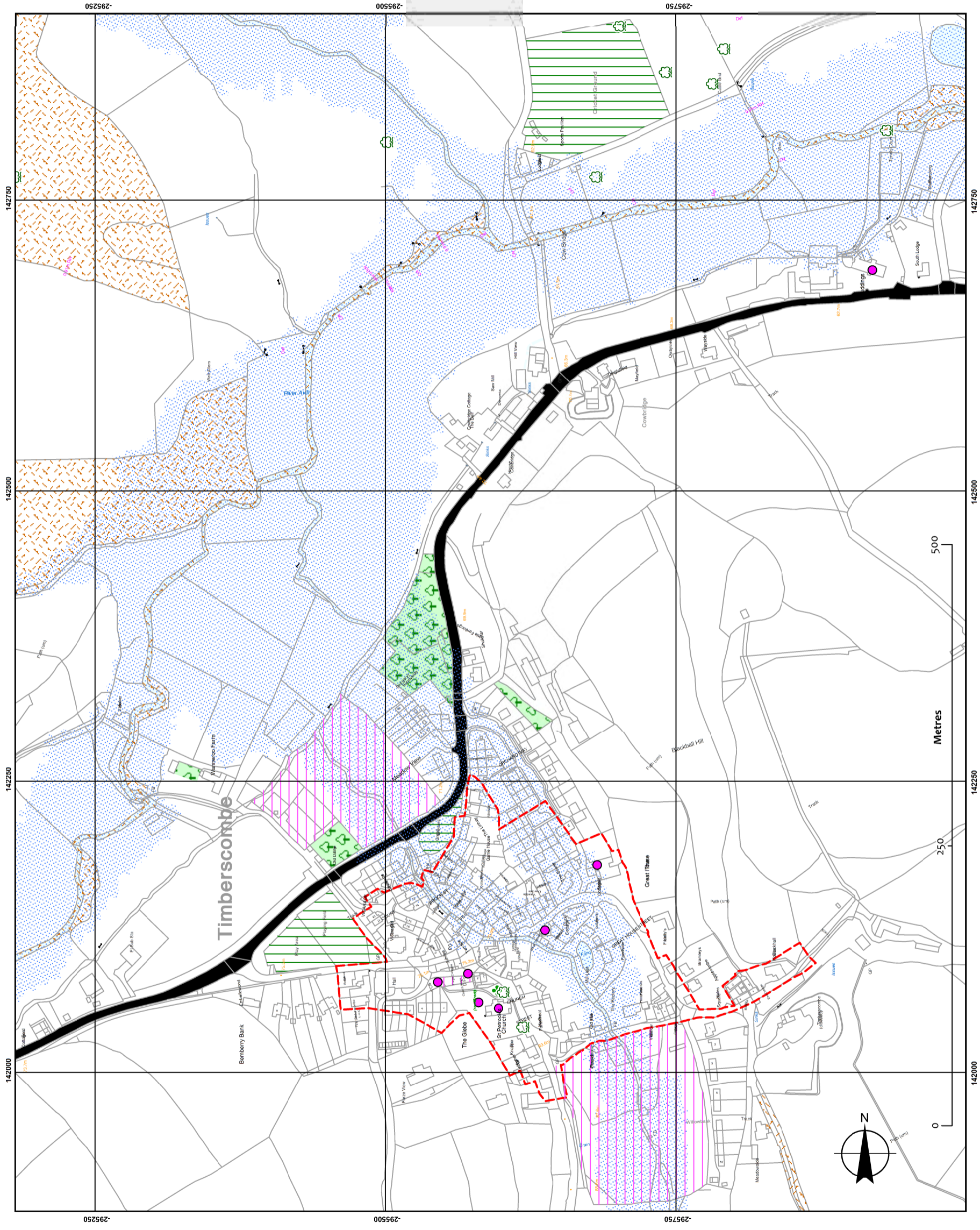


**Exford
Inset Map 9**

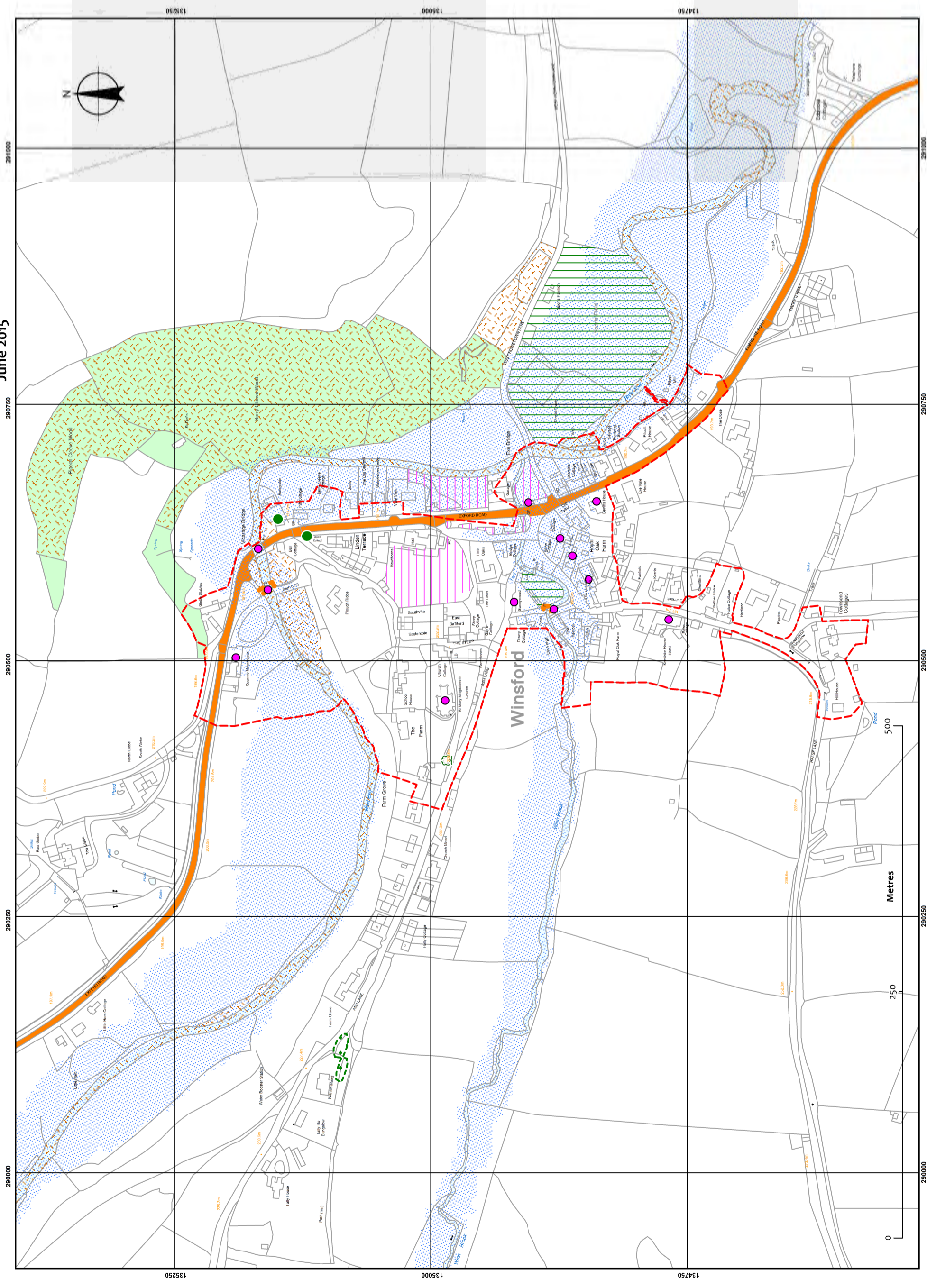


**Parracombe
Inset Map 13**

**Simonsbath
Inset Map 17**



**Timberscombe
Inset Map 18**



**Winsford
Inset Map 19**

**Wootton Courtenay
Inset Map 21**