



EXMOOR

NATIONAL PARK

EXMOOR NATIONAL PARK AUTHORITY
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1 June 2022

EXMOOR NATIONAL PARK AUTHORITY

To: All Members of the Exmoor National Park Authority

The Annual Meeting of the Exmoor National Park Authority will be held in the **Committee Room, Exmoor House, Dulverton** on **Tuesday 14 June 2022 at 10.00am.**

Please Note: The Authority is currently trialling a new meeting format to better manage Authority business, so Agenda items relating to the Authority's role as sole **local planning authority** for the National Park area, including determination of planning applications, will commence at **1.30 pm.**

The meeting will be open to the press and public subject to the passing of any resolution under s.100(A)(4) of the Local Government Act 1972.

There is Public Speaking at this meeting, when the Chairperson will allow members of the public two minutes each to ask questions, make statements, or present a petition relating to any item relevant to the business of the Authority or relating to any item on the Agenda. Anyone wishing to ask questions should notify the Corporate Support Officer as soon as possible, or at the latest by 4pm on the working day before the meeting of the agenda item on which they wish to speak, indicating a brief summary of the matter or matters to be raised (contact Judy Coles on 01398 322250 or email jcoles@exmoor-nationalpark.gov.uk).

The meeting will be **recorded**. By entering the Authority's Committee Room and speaking during Public Speaking you are consenting to being recorded. We will make the recording available via our website for members of the public to listen to and/or view, within 72 hours of the meeting taking place.

Members of the public may use Facebook and Twitter or other forms of social media to report on proceedings at this meeting. Anyone wishing to film part or all of the proceedings may do so unless the press and public are excluded for that part of the meeting or there is good reason not to do so. As a matter of courtesy, anyone wishing to film proceedings is asked to advise the Chairperson so that those present may be made aware.

(The agenda and papers for this meeting can be downloaded from the National Park Authority's website www.exmoor-nationalpark.gov.uk).

Sarah Bryan
Chief Executive

AGENDA

1. Election of Chairperson

The first section of the meeting will be chaired by the Chairperson of the Authority.

2. Election of Deputy Chairperson

3. Election of Deputy Chairperson (Planning)

4. Apologies for Absence

5. Declarations of Interest/Lobbying of Members/Unaccompanied Site Visits

Members are asked to declare:-

- (1) any interests they may have in relation to items on the agenda for this meeting;
- (2) any lobbying by anyone concerned with a planning application and any unaccompanied site visits where contact has been made with any person concerned with a planning application.

(NB. When verbally making these declarations, members are also asked to complete the Disclosures at Meetings form – attached for members only).

6. Chairperson's Announcements

7. **Minutes**
 - (1) To approve as a correct record the Minutes of the meeting of the Authority held on 3 May 2022 (Item 7).
 - (2) To consider any Matters Arising from those Minutes.

8. **Public Speaking:** The Chairperson will allow members of the public to ask questions, make statements, or present a petition. Questions of a general nature relevant to the business of the Authority can be asked under this agenda item. Any questions specific to an agenda item can be posed when that item is considered subject to the discretion of the person presiding at the meeting.

9. **External Audit Plan for the Year Ending 31 March 2022:** To consider the report of the Chief Finance Officer (Item 9)

10. **Exmoor National Park Authority Local Plan Review:** To consider the report of the Head of Strategy and Performance (Item 10)

11. **Annual Appointments:** To consider the report of the Head of Strategy and Performance (Item 11)

12. **Corporate Plan Report 2021-22:** To consider the report of the Head of Strategy and Performance (Item 12)

13. Personnel Update

Starters:

- 23/05/2022 - Harry Britton – Seasonal Assistant Ranger (6 months fixed term contract)

Leavers:

- 25/05/2022 – Lynn Henderson – Corporate Support Assistant (Resignation)

14. Any Other Business of Urgency

Agenda items relating to the Authority’s role as sole local planning authority for the National Park area including determination of planning applications. This section of the meeting will be chaired by the Deputy Chairperson (Planning). If the Deputy Chairperson (Planning) is absent, the Deputy Chairperson of the Authority shall be preside.

15. Development Management: To consider the report of the Head of Planning and Sustainable Development on the following:-

Agenda Item	Application No.	Description	Page Nos.
15.1	6/35/22/101	Proposed storage of timber and wood chipping operation used in connection with the applicant’s existing combined heat and power generating business on land form part of the parking area previously granted planning permission (6/35/08/101) for the nearby equestrian course. Resubmission of application 6/35/21/103. (Part retrospective) – Land adjoining B3224 at Treborough Common – Easting 300250: Northing 135050, Treborough, Watchet	1 – 14
15.2	6/27/22/106	Proposed erection of a 3m x 3m detached shed. Retrospective – Watermill Cottage, Hawkcombe, Porlock, Minehead, TA24 8QW	15 – 24
15.3	6/40/22/102	Application Under Regulation 3 of The Town & Country Planning General Regulations 1992 for proposed construction of footbridge – River Barle (Easting 285773, Northing 133879), Below Great Bradley, Withypool, Minehead, Somerset	25 - 36

16. Application Decisions Delegated to the Chief Executive: To note the applications determined by the Chief Executive under delegated powers (Item 16).

17. Site Visits: To arrange any site visits agreed by the Committee (the reserve date being Friday, 1 July 2022 (am)).

Further information on any of the reports can be obtained by contacting the National Park Authority at the address and telephone numbers at the top of the agenda. Details of the decisions taken at this meeting will be set out in the formal Minutes which the Committee will be asked to approve as a correct record at its next meeting. In the meantime, details of the decisions can be obtained from Judy Coles, Corporate Support Officer, at Exmoor House.

ITEM 7

EXMOOR NATIONAL PARK AUTHORITY

MINUTES of the Meeting of the Exmoor National Park Authority held on Tuesday, 3 May 2022 at 10.00am in the Committee Room, Exmoor House, Dulverton.

PRESENT

Mr R Milton (Chairperson)
Miss A V Davis (Deputy Chairperson)
Mr S J Pugsley (Deputy Chairperson (Planning))

Mrs L Blanchard	Mrs F Nicholson
Mr M Ellicott	Mr J Patrinos
Mr D Elson	Mr N Thwaites
Mr J Holtom	Dr S Warren
Mr J Hunt	Mrs P Webber
Dr M Kelly	Mr V White
Mr E Ley	Mr J Yabsley
Mr A Milne	

Apologies for absence were received from Mr M Kravis, Mrs C Lawrence, Mr B Revans and Miss E Stacey

152. DECLARATIONS OF INTEREST: There were none

153. CHAIRPERSON'S ANNOUNCEMENTS:

- The meeting noted that The Exmoor Society Spring Conference, in partnership with the National Park Authority, had taken place at Porlock Village Hall on Friday, 22nd April with a theme of "The Challenge of Change". The event attracted an interesting line-up of external speakers to challenge thinking, along with the viewpoint of farmers who highlighted the serious underlying concerns about the current policy direction of travel from those people living and working on Exmoor.

154. MINUTES

- Confirmation:** The Minutes of the Authority's meeting held on 5 April 2022 were agreed and signed as a correct record.
- Matters arising:** There were no matters arising

155. PUBLIC SPEAKING: Mr R Foxwell, Local Resident

156. FINAL ACCOUNTS COMMITTEE AND AUDITORS ANNUAL REPORT (REVIEW OF VALUE FOR MONEY) 2020/21

The Authority considered the report of the Chief Finance Officer

The Authority's Consideration

Mr Gareth Mills and Mr Mark Bartlett from Grant Thornton joined the meeting remotely via Microsoft Teams to present the findings of the Auditors Annual Report (Review of Value for Money) 2020/21 to the Authority Committee.

The meeting noted that the Authority had recently received the Whole of Government Accounts (WGA) template and so the WGA Component Assurance Statement would be submitted once the template was completed.

In relation to the improvement recommendations contained on Pages 14 and 19 of the report, it was confirmed that Leadership Team still needed to discuss these and agree a response. The Authority therefore requested that the Leadership Team recommendations should be brought back to the Authority for information.

In concluding the debate, Members thanked the Head of Finance and Operations and the Finance Team for all their work over the last 12 months.

RESOLVED:

- (1) To receive and note the draft **minutes** of the Final Accounts Committee meeting held on 11 January 2022.
- (2) To receive and note the **Auditor's Annual Report (Review of Value for Money)** for the year ended 31 March 2021.
- (3) To request that once Leadership Team have agreed a response to the improvement recommendations contained on Pages 14 and 19 of the Auditors Annual Report, their recommendations will be brought back to the Authority for information.

157. FARMING IN PROTECTED LANDSCAPES PROGRAMME – YEAR 1 UPDATE

The Authority considered the **report** of the Head of Conservation and Access

The Authority's Consideration

The Authority Committee wished to thank the Conservation Manager and his team for all their hard work to ensure the success of the Farming in Protected Landscapes programme for the first year, particularly given the challenging nature of its sudden launch and subsequent tight timescales.

Those Members who had been appointed as specialists to the Local Assessment Panel confirmed that it had been difficult to maintain continuity with infrequent attendance and welcomed the proposal to appoint four permanent Members as part of the Annual Appointments process at the June Authority meeting.

A number of Members expressed the desire for the Authority to take a more strategic approach to its thinking around farming practices and landscape management, which could encompass a variety of different projects such as FiPL, the Nature Recovery Vision, gorse management, tree recovery, Future Farming, etc.

It was noted that this would require a long-term discussion with many different stakeholders, due to the wide range of opinions that were held about farming practices. However, it was considered that it would be a good outcome if a forum could come together to instigate a discussion, possibly via the Exmoor Moorland and Farming Board.

RESOLVED:

- (1) To welcome additional funding from Defra in 2022/23 and 2023/24 in order to deliver the remaining two years of the Farming in Protected Landscapes programme.
- (2) To agree to a re-selection of Authority Members of the Local Assessment Panel at the June Annual Appointments.

Mr Elson left the meeting during Item 7 above

158. EXTERNAL FUNDING UPDATE

The Authority considered the [report](#) of the Head of Planning and Sustainable Development

The Authority's Consideration

The Authority Committee wished to thank the Rural Enterprise Manager and the Funding and Project Development Officer for their work in pulling together the Project Prospectus. Members were encouraged to share it widely with their networks in order to showcase potential projects to relevant partners and stakeholders. Given the reduction in government funding over recent years, it was considered essential for the Authority to be able to attract significant amounts of external funding in order to ensure it can continue delivering against National Park purposes.

In relation to the designation of funds from the two recent legacies, Members were reminded that the proposed projects reflected the mood of their previous discussions with officers and was in line with the stipulations attached to the legacies. On that basis the Authority Committee were happy to accept the recommendations contained within the report but requested that Members continue to be consulted about any further allocations.

RESOLVED:

- (1) To note the achievements within the CareMoor for Exmoor scheme.
- (2) To commit to utilizing the funding prospectus and project pipeline to help champion Authority priorities with funding opportunities as appropriate.
- (3) To agree initial allocation of recently received legacies, detailed in Section 4.4 to the report, and to involve Members in further development of projects.

159. ANY OTHER BUSINESS OF URGENCY: There was none

160. CONFIDENTIAL BUSINESS

RESOLVED: To pass a resolution pursuant to Section 100A(4) of the Local Government Act 1972 that the press and public be excluded from the meeting for the duration of Item 11 (Driver Farm) on the grounds that publicity would be prejudicial to the public interest by reason of the confidential nature of the business arising in Item 11 below and that the following information would be considered which is exempt information as presented in Schedule 12A of the Act (as amended):-

Information relating to the financial or business affairs of any particular person (including the authority holding that information).

The meeting closed for recess at 11.52 am and reconvened at 12.05 pm

161. DRIVER FARM: The Authority received the joint report of the Head of Finance and Operations and Head of Conservation and Access

RESOLVED: To accept the resignation of the current tenant of Driver Farm and acknowledge the liabilities attached to this.

The meeting closed for recess at 12.42 pm

Items relating to the Authority's role as sole local planning authority for the National Park area including determination of planning applications. This section of the meeting was chaired by Mr S J Pugsley, Deputy Chairperson (Planning).

Dr S Warren and Mrs P Webber left the meeting

The meeting reconvened at 1.30 pm

DEVELOPMENT MANAGEMENT

162. Application No: 62/50/22/001

Location: Ladyswell Farm, Parracombe, Barnstaple, EX31 4RL

Proposal: Proposed change of use of field from agriculture to fenced dog exercise area, measuring 50m x 20m, ancillary to kennels. Retrospective

The Authority considered the [report](#) of the Head of Planning and Sustainable Development.

The Authority's Consideration

The Committee noted that, should the Committee be minded to approve the application, Planning Officers had reflected on the wording of Condition 2 and Condition 3 in the report and proposed that changes be made to ensure the conditions were more appropriate and enforceable.

Furthermore, in relation to Condition 2, Members suggested that the wording should be further simplified to ensure clarity. In addition, it was proposed and agreed that a Condition 5 should be added to restrict the use of any external lighting at the development site.

In relation to a query by Mr Thwaites about the need for Condition 4, it was explained that it was the objective of the planning system to introduce biodiversity improvements on every planning application, unless there was a good reason not to.

Members had sympathy with the concerns raised by the Parish Council in relation to the proximity of the enclosure to the restricted byway and road junction. However, it was noted that the use of the off-lead dog walking area was required to meet the provisions of the North Devon Council licence, the Highways Authority had not raised any objections in relation to the application, and the Rights of Way officer had advised the application could be supported with appropriate conditions.

Having taken into consideration all the points discussed, and the amendments to the conditions as outlined below, the Authority Committee resolved to grant planning permission in line with the officer recommendation.

RESOLVED: To grant planning permission subject to a signed S106 Agreement and the conditions set out in the report, subject to the proposed amendment to Condition 11.

- 1) The works hereby approved shall not be carried out except in complete accordance with the Location Plan (revised) dated 2nd March File No 4; the Site Plan (revised) dated 2nd March File No 5; and the fence elevations drawing dated 13th January 2022 File No 3

Reason: To avoid harm to the setting and to ensure the works accord with the approved details.

- 2) The use of the site will be only for exercising dogs being cared for by the adjoining kennel business in association with that business; no more than six dogs will be exercised at any one time; and dogs will be supervised by the operator of the kennels at all times.

Reason: In the interests of highway safety and animal welfare.

- 3) The boundary between the edge of the field and the right of way will remain a mature and dense hedgerow to at least 3 metres in height.

Reason: To avoid harm to the setting of the surrounding landscape and in the interests of highway safety and animal welfare.

- 4) Within three months of the date of this permission two (total) bird and bat boxes shall be installed in the hedgerow to the north of the dog walking area. Once installed the applicant shall provide the Local Planning Authority with photographs of the bird and bat box in place and there after the boxes will be maintained.

Reason: in the interests of enhancing biodiversity

- 5) The development, hereby approved, shall not be artificially illuminated in any way unless details have first been submitted to and approved in writing by the Local Planning Authority. The artificial illumination(s) shall thereafter be installed and operated fully in accordance with the approved scheme.

Reason: To retain control over external lighting in the interests of visual amenity and protecting Exmoor's dark night sky.

163. Application No: 6/26/21/113

Location: Brookside, Roadwater Road, Roadwater, Watchet, TA23 0RG

Proposal: Proposed demolition of garage and erection of a two storey side extension

The Authority considered the [report](#) of the Head of Planning and Sustainable Development.

RESOLVED: To grant planning permission subject to the conditions set out in the report:

164. Application No: 6/10/22/103LB

Location: 30 High Street, Dunster, Minehead, TA24 6SG

Proposal: Listed Building consent for the proposed removal of kitchen doors and windows and replacement with timber bi-folds

The Authority considered the **report** of the Head of Planning and Sustainable Development.

RESOLVED: To grant planning permission subject to the conditions set out in the report:

165. Application No: 6/14/22/103

Location: Pinkery Centre for Outdoor Learning, Simonsbath, Minehead, TA24 7LL

Proposal: Application under Regulation 3 of the Town & Country Planning General Regulations 1992 for proposed erection of 3m mast antenna

The Authority considered the **report** of the Head of Planning and Sustainable Development.

The Authority's Consideration

In relation to a query from Members about what the proposed development would look like, Officers drew the meetings attention back to the slide in the committee presentation which detailed the four elevations of the proposed mast and antenna and the overall site layout

In line with the Authority's recent objective to introduce biodiversity improvements on as many planning applications as possible, the Committee delegated to Officers to ensure that some form of biodiversity enhancement was installed at or near the application site.

RESOLVED: To grant planning permission subject to the conditions set out in the report, with the addition of a condition to seek biodiversity enhancements on land surrounding the application site.

166. APPLICATION DECISIONS DELEGATED TO THE CHIEF EXECUTIVE: The Authority noted the **decisions of the Chief Executive determined under delegated powers.**

167. SITE VISITS: There were no site visits to arrange.

The meeting closed at 2.34 pm

(Chairperson)

EXMOOR NATIONAL PARK AUTHORITY

14 June 2022

EXTERNAL AUDIT PLAN FOR THE YEAR ENDING 31 MARCH 2022

Report of the Chief Finance Officer

Purpose of Report: To present to Members the Grant Thornton Audit Plan.

RECOMMENDATION: The Authority is recommended to receive the report with associated appendices.

Authority priority: Getting best value from our resources and improving our performance – Finance and Performance - Financial Management.

Legal and equality implications: Local Government Act 2003, Parts 1-3 (Capital Finance, Financial Administration and Grants), Sections 1-39, Accounts and Audit Regulations 2015, Sections 3 (Responsibility for Internal Control), 4 (Accounting Records and Control Systems) 5 (Internal Audit), and 6 (Review of Internal Control System).

The equality and human rights impact of the recommendations of this report have been assessed as having no adverse impact on any particular group or individual.

Financial and risk implications: Provision has been made in the 2021/22 budget to cover the costs of both external and internal audit. Additional resources should be available to meet the increased cost of External Audit.

Climate change response: Nothing contained within this report will impact upon the Authority's ability to meet its climate change targets.

1. External Audit

- 1.1 Grant Thornton UK LLP is our appointed auditor, appointed to audit finance and governance arrangements within the Authority. They have provided a report which details their progress in delivering their responsibilities as External Auditors, their view of materiality and risks identified.
- 1.2 Gareth Mills, Engagement Lead and Liam Royle, Engagement Manager are responsible for undertaking the relevant work. They are endeavouring to present the report themselves electronically and this is attached at Appendix 1. Appendix 2 explains the process by which their risk assessment is informed.

Gordon Bryant
Chief Finance Officer
May 2022



Exmoor National Park Authority 2021-22 Audit Plan

Year ending 31 March 2022

25 May 2022



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The contents of this report relate only to the matters which have come to our attention, which we believe need to be reported to you as part of our audit planning process. It is not a comprehensive record of all the relevant matters, which may be subject to change, and in particular we cannot be held responsible to you for reporting all of the risks which may affect the Authority or all weaknesses in your internal controls. This report has been prepared solely for your benefit and should not be quoted in whole or in part without our prior written consent. We do not accept any responsibility for any loss occasioned to any third party acting, or refraining from acting on the basis of the content of this report, as this report was not prepared for, nor intended for, any other purpose.

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1. Key matters

Factors

Authority financial developments

During 2021-22 we have engaged with the Head of Finance and Operations in order to ensure we have a regular dialogue regarding the financial standing of the Authority.

The Revised Budget as at November 2021 is projecting a breakeven position for the financial year; additional pressures in year have been met with robust car parking and NPC income and savings on travel costs. A surplus of £104k was achieved against the core budget in the previous year.

For the period covered by the Medium Term Financial Plan starting in 2022-23 the Authority has assumed a flat cash settlement for National Park Grant, and a consequent need for savings in future years to achieve a balanced budget. The Authority therefore continues to operate in a challenging financial environment.

Recovery from Covid 19 pandemic

Despite challenges from continuing Covid restrictions, the Authority has continued to manage its finances in order to mitigate the impact of the pandemic, and as in the prior year has not needed additional funding from DEFRA.

Our response

- As a firm, we are absolutely committed to audit quality and financial reporting in the local government sector. Appendix B sets out the Firm's latest assessment on the quality of our public sector audit work from our regulator the Financial Reporting Council (FRC). The findings from the FRC show a significant improvement in recent years.
- Our proposed work and fee, as set further in our Audit Plan, has been discussed with the Head of Finance and Operations.
- We will consider your arrangements for managing and reporting your financial resources as part of our work in completing our Value for Money work.
- We identified six recommendations in the prior year. Of these five have been actioned in year, with one outstanding due to the impact of the ongoing local government reorganisation in Somerset.
- We will continue to provide you with sector updates via our progress and sector updates.

2. Introduction and headlines

Purpose

This document provides an overview of the planned scope and timing of the statutory audit Exmoor National Park Authority ('the Authority') for those charged with governance.

Respective responsibilities

The National Audit Office ('the NAO') has issued a document entitled Code of Audit Practice ('the Code'). This summarises where the responsibilities of auditors begin and end and what is expected from the audited body. Our respective responsibilities are also set out in the agreed in the Terms of Appointment and Statement of Responsibilities issued by Public Sector Audit Appointments (PSAA), the body responsible for appointing us as auditor of Exmoor National Park Authority.

Scope of our audit

The scope of our audit is set in accordance with the Code and International Standards on Auditing (ISAs) (UK). We are responsible for forming and expressing an opinion on the Authority's financial statements that have been prepared by management with the oversight of those charged with governance (the Authority); and we consider whether there are sufficient arrangements in place at the Authority for securing economy, efficiency and effectiveness in your use of resources. Value for money relates to ensuring that resources are used efficiently to maximise the outcomes that can be achieved.

The audit of the financial statements does not relieve management or the Authority of your responsibilities. It is the responsibility of the Authority to ensure that proper arrangements are in place for the conduct of its business, and that public money is safeguarded and properly accounted for. We have considered how the Authority is fulfilling these responsibilities.

Our audit approach is based on a thorough understanding of the Authority's business and is risk based.

Significant risks

Those risks requiring special audit consideration and procedures to address the likelihood of a material financial statement error have been identified as:

- Management over-ride of controls
- Valuation of land and buildings
- Valuation of net pension fund liability.

We will communicate significant findings on these areas as well as any other significant matters arising from the audit to you in our Audit Findings (ISA 260) Report.

Materiality

We have determined planning materiality to be £90k (PY £100k) for the Authority, which equates to 2% of your prior year gross expenditure for the year. We are obliged to report uncorrected omissions or misstatements other than those which are 'clearly trivial' to those charged with governance. Clearly trivial has been set at £4.5k (PY £5k).

Value for Money arrangements

Our risk assessment regarding your arrangements to secure value for money has not identified any risks of significant weakness at this time. We will continue to keep this under review as our audit progresses.

Audit logistics

Our interim visit took place in March and April 2022 and the majority of our final audit visit will take place in August and September 2022. Our key deliverables are this Audit Plan, our Audit Findings (ISA260) Report (due in September) and our Auditor's Annual Report on your VFM arrangements (targeted for November 2022).

Our proposed fee for the audit will be £18,454 (PY: £16,004) for the Authority, subject to the Authority delivering a good set of financial statements and working papers. Our fee will be confirmed at the end of our audit work and will be subject to approval by PSAA.

We have complied with the Financial Reporting Authority's Ethical Standard (revised 2019) and we as a firm, and each covered person, confirm that we are independent and are able to express an objective opinion on the financial statements.

3. Significant risks identified

Significant risks are defined by ISAs (UK) as risks that, in the judgement of the auditor, require special audit consideration. In identifying risks, audit teams consider the nature of the risk, the potential magnitude of misstatement, and its likelihood. Significant risks are those risks that have a higher risk of material misstatement.

Risk	Reason for risk identification	Key aspects of our proposed response to the risk
ISA240 revenue risk	<p>Under ISA (UK) 240 there is a rebuttable presumed risk that revenue may be misstated due to the improper recognition of revenue.</p> <p>This presumption can be rebutted if the auditor concludes that there is no risk of material misstatement due to fraud relating to revenue recognition.</p>	<p>Having considered the risk factors set out in ISA240 and the nature of the revenue streams at the Authority, we have determined that the risk of fraud arising from revenue recognition can be rebutted, because:</p> <ul style="list-style-type: none"> • there is little incentive to manipulate revenue recognition • opportunities to manipulate revenue recognition are very limited • the culture and ethical frameworks of local authorities, including the Authority, mean that all forms of fraud are seen as unacceptable. <p>Therefore we do not consider this to be a significant risk for the Authority.</p>
Risk of fraud related to expenditure recognition (PAF Practice Note 10)	<p>In line with the Public Audit Forum Practice Note 10, in the public sector, auditors must also consider the risk that material misstatements due to fraudulent financial reporting may arise from the manipulation of expenditure recognition (for instance by deferring expenditure to a later period)</p>	<p>We have rebutted this presumed risk for the Authority because:</p> <ul style="list-style-type: none"> • expenditure is well controlled and the Authority has a strong control environment • the Authority has clear and transparent reporting of its financial plans and financial position to the Authority. <p>We therefore do not consider this to be a significant risk for the Authority.</p>
Management over-ride of controls	<p>Under ISA (UK) 240 there is a non-rebuttable presumed risk that the risk of management over-ride of controls is present in all entities.</p>	<p>We will:</p> <ul style="list-style-type: none"> • evaluate the design effectiveness of management controls over journals • analyse the journals listing and determine the criteria for selecting high risk unusual journals • test unusual journals recorded during the year and after the draft accounts stage for appropriateness and corroboration • gain an understanding of the accounting estimates and critical judgements applied made by management and consider their reasonableness with regard to corroborative evidence • evaluate the rationale for any changes in accounting policies, estimates or significant unusual transactions.

Significant risks identified - continued

Risk	Reason for risk identification	Key aspects of our proposed response to the risk
Valuation of the pension fund net liability	<p>The Authority's pension fund net liability, as reflected in its balance sheet as the net defined benefit liability, represents a significant estimate in the financial statements.</p> <p>The pension fund net liability is considered a significant estimate due to the size of the numbers involved (c£14 million in the 2020-21 balance sheet) and the sensitivity of the estimate to changes in key assumptions.</p> <p>We therefore identified valuation of the Authority's pension fund net liability as a significant risk, which was one of the most significant assessed risks of material misstatement.</p>	<p>We will:</p> <ul style="list-style-type: none"> ▪ update our understanding of the processes and controls put in place by management to ensure that the Authority's pension fund net liability is not materially misstated and evaluate the design of the associated controls ▪ evaluate the instructions issued by management to their management expert (an actuary) for this estimate and the scope of the actuary's work ▪ assess the competence, capabilities and objectivity of the actuary who carried out the Authority's pension fund valuation ▪ assess the accuracy and completeness of the information provided by the Authority to the actuary to estimate the liability ▪ test the consistency of the pension fund asset and liability and disclosures in the notes to the core financial statements with the actuarial report from the actuary ▪ undertake procedures to confirm the reasonableness of the actuarial assumptions made by reviewing the report of the consulting actuary (as auditor's expert) and performing any additional procedures suggested within the report ▪ obtain assurances from the auditor of Somerset Pension Fund as to the controls surrounding the validity and accuracy of membership data; contributions data and benefits data sent to the actuary by the pension fund and the fund assets valuation in the pension fund financial statements.
Valuation of land and buildings	<p>The Authority revalues its land and buildings on an annual basis to ensure that the carrying value is not materially different from the current value or fair value (for surplus assets) at the financial statements date.</p> <p>This valuation represents a significant estimate by management in the financial statements due to the size of the numbers involved (c£19.1 million in the 2020-21 balance sheet) and the sensitivity of this estimate to changes in key assumptions.</p> <p>Management have engaged the services of a valuer to estimate the current value as at 31 March 2022. The Authority have engaged an external valuer in 2021-22, as in the prior year.</p> <p>We therefore identified the closing valuation of land and buildings as a significant risk, which was one of the most significant assessed risks of material misstatement.</p>	<p>We will:</p> <ul style="list-style-type: none"> • evaluate management's processes and assumptions for the calculation of the estimate, the instructions issued to the valuation experts and the scope of their work • evaluate the competence, capabilities and objectivity of the valuation expert • write to the valuer to confirm the basis on which the valuation was carried out • evaluate the basis of the valuation (given the change in valuer for 2020-21 to an external expert) • challenge the information and assumptions used by the valuer to assess completeness and consistency with our understanding • test, on a sample basis, revaluations made during the year to ensure they have been input correctly into the Authority's asset register • evaluate the assumptions made by management for any assets not revalued during the year and how management has satisfied themselves that these are not materially different to current value.

4. Accounting estimates and related disclosures

The Financial Reporting Authority issued an updated ISA (UK) 540 (revised): *Auditing Accounting Estimates and Related Disclosures* which includes significant enhancements in respect of the audit risk assessment process for accounting estimates.

Introduction

Under ISA (UK) 540 (Revised December 2018) auditors are required to understand and assess an entity's internal controls over accounting estimates, including:

- The nature and extent of oversight and governance over management's financial reporting process relevant to accounting estimates
- How management identifies the need for and applies specialised skills or knowledge related to accounting estimates
- How the entity's risk management process identifies and addresses risks relating to accounting estimates
- The entity's information system as it relates to accounting estimates
- The entity's control activities in relation to accounting estimates
- How management reviews the outcomes of previous accounting estimates.

As part of this process auditors also need to obtain an understanding of the role of those charged with governance, which is particularly important where the estimates have high estimation uncertainty, or require significant judgement.

Specifically do Authority members:

- Understand the characteristics of the methods and models used to make the accounting estimates and the risks related to them
- Oversee management's process for making accounting estimates, including the use of models, and the monitoring activities undertaken by management
- Evaluate how management made the accounting estimates?



Accounting estimates and related disclosures

Additional information that will be required

To ensure our compliance with this revised auditing standard, we will be requesting further information from management and those charged with governance during our audit for the year ended 31 March 2022.

Based on our knowledge of the Authority we have identified the following material accounting estimates for which this is likely to apply:

- Valuations of land and buildings
- Depreciation
- Year end provisions and accruals
- Valuation of defined benefit net pension fund liabilities.

The Authority's information systems

In respect of the Authority's information systems we are required to consider how management identifies the methods, assumptions and source data used for each material accounting estimate and the need for any changes to these. This includes how management selects, or designs, the methods, assumptions and data to be used and applies the methods used in the valuations.

When the models used include increased complexity or subjectivity, as is the case for many valuation models, auditors need to understand and assess the controls in place over the models and the data included therein. Where adequate controls are not in place we may need to report this as a significant control deficiency and this could affect the amount of detailed substantive testing required during the audit.

If management has changed the method for making an accounting estimate we will need to fully understand management's rationale for this change. Any unexpected changes are likely to raise the audit risk profile of this accounting estimate and may result in the need for additional audit procedures.

We are aware that the Authority uses management experts in deriving some of its more complex estimates, e.g. asset valuations and pensions liabilities. However, it is important to note that the use of management experts does not diminish the responsibilities of management and those charged with governance to ensure that:

- All accounting estimates and related disclosures included in the financial statements have been prepared in accordance with the requirements of the financial reporting framework, and are materially accurate
- There are adequate controls in place at the Authority (and where applicable its service provider or management expert) over the models, assumptions and source data used in the preparation of accounting estimates.



Estimation uncertainty

Under ISA (UK) 540 we are required to consider the following:

- How management understands the degree of estimation uncertainty related to each accounting estimate
- How management address this estimation uncertainty when selecting their point estimate.

For example, how management identified and considered alternative, methods, assumptions or source data that would be equally valid under the financial reporting framework, and why these alternatives were rejected in favour of the point estimate used.

The revised standard includes increased emphasis on the importance of the financial statement disclosures. Under ISA (UK) 540 (Revised December 2018), auditors are required to assess whether both the accounting estimates themselves and the related disclosures are reasonable.

Where there is a material uncertainty, that is where there is a significant risk of a material change to the estimated carrying value of an asset or liability within the next year, there needs to be additional disclosures. Note that not all material estimates will have a material uncertainty and it is also possible that an estimate that is not material could have a risk of material uncertainty.

Where there is material estimation uncertainty, we would expect the financial statement disclosures to detail:

- What the assumptions and uncertainties are
- How sensitive the assets and liabilities are to those assumptions, and why
- The expected resolution of the uncertainty and the range of reasonably possible outcomes for the next financial year
- An explanation of any changes made to past assumptions if the uncertainty is unresolved.

Planning enquiries

As part of our planning risk assessment procedures we have made enquires to management. Management have provided their responses, which will be considered by the Authority at its June meeting.

Further information

Further details on the requirements of ISA (UK) 540 (Revised December 2018) can be found in the auditing standard on the Financial Reporting Authority's website:

[https://www.frc.org.uk/getattachment/0fa69c03-49ec-49ae-a8c9-cc7a2b65382a/ISA-\(UK\)-540_Revised-December-2018_final.pdf](https://www.frc.org.uk/getattachment/0fa69c03-49ec-49ae-a8c9-cc7a2b65382a/ISA-(UK)-540_Revised-December-2018_final.pdf)

5. Other matters

Other work

In addition to our responsibilities under the Code of Practice, we have a number of other audit responsibilities, as follows:

- We read your Narrative Report and Annual Governance Statement to check that they are consistent with the financial statements on which we give an opinion and our knowledge of the Authority
- We carry out work to satisfy ourselves that disclosures made in your Annual Governance Statement are in line with requirements set by CIPFA
- We carry out work on your consolidation schedules for the Whole of Government Accounts process in accordance with NAO group audit instructions
- We consider our other duties under legislation and the Code, as and when required, including:
 - giving electors living within the Authority's boundary the opportunity to raise questions about your 2021-22 financial statements, consider and decide upon any objections received in relation to the 2021-22 financial statements
 - issuing a report in the public interest or written recommendations to the Authority under section 24 of the Local Audit and Accountability Act 2014 (the Act)
 - application to the court for a declaration that an item of account is contrary to law under section 28 or a judicial review under section 31 of the Act
 - issuing an advisory notice under section 29 of the Act.
- We certify completion of our audit.

Other material balances and transactions

Under International Standards on Auditing, "irrespective of the assessed risks of material misstatement, the auditor shall design and perform substantive procedures for each material class of transactions, account balance and disclosure". All other material balances and transaction streams will therefore be audited. However, the procedures will not be as extensive as the procedures adopted for the risks identified earlier in this report.

The Authority uses the payroll system provided by Somerset County Council. We will request an assurance letter from the auditor of the County Council over the payroll system and whether there are any control issues that we need to be aware of. The timing of the receipt of this assurance will influence when we will be able to conclude our audit of the Authority's accounts.

6. Materiality

The concept of materiality

Materiality is fundamental to the preparation of the financial statements and the audit process and applies not only to the monetary misstatements but also to disclosure requirements and adherence to acceptable accounting practice and applicable law. Misstatements, including omissions, are considered to be material if they, individually or in the aggregate, could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements.

Materiality for planning purposes

We have determined financial statement materiality based on a proportion of the gross expenditure of the Authority for the financial year. In the prior year we used the same benchmark. Materiality at the planning stage of our audit is £90k (PY £100k) which equates to 2% of your forecast gross expenditure for the year. We design our procedures to detect errors in specific accounts at a lower level of precision which we have determined to be £10k for senior officer remuneration.

We reconsider planning materiality if, during the course of our audit engagement, we become aware of facts and circumstances that would have caused us to make a different determination of planning materiality.

Matters we will report to the Authority

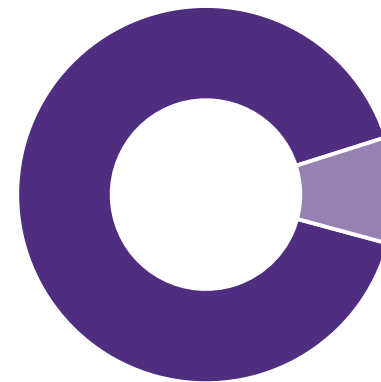
Whilst our audit procedures are designed to identify misstatements which are material to our opinion on the financial statements as a whole, we nevertheless report to the Authority any unadjusted misstatements of lesser amounts to the extent that these are identified by our audit work. Under ISA 260 (UK) 'Communication with those charged with governance', we are obliged to report uncorrected omissions or misstatements other than those which are 'clearly trivial' to those charged with governance.

ISA 260 (UK) defines 'clearly trivial' as matters that are clearly inconsequential, whether taken individually or in aggregate and whether judged by any quantitative or qualitative criteria. In the context of the Authority, we propose that an individual difference could normally be considered to be clearly trivial if it is less than £4.5k (PY £5k).

If management have corrected material misstatements identified during the course of the audit, we will consider whether those corrections should be communicated to the Authority to assist it in fulfilling its governance responsibilities.

Prior year gross operating costs

£4,538k Authority
(PY: £4,988k)



■ Prior year gross operating costs

Materiality

£90k
Authority financial statements materiality
(PY: £100k)



£4.5k
Misstatements reported to the Authority
(PY: £5k)

7. Value for Money arrangements

Approach to Value for Money work for 2021-22

The National Audit Office (NAO) issued updated guidance for auditors in April 2020. The Code requires auditors to consider whether the body has put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources. When reporting on these arrangements, the Code requires auditors to structure their commentary on arrangements under three specified reporting criteria. These are as set out below:



Improving economy, efficiency and effectiveness

Arrangements for improving the way the body delivers its services. This includes arrangements for understanding costs and delivering efficiencies and improving outcomes for service users.



Financial Sustainability

Arrangements for ensuring the body can continue to deliver services. This includes planning resources to ensure adequate finances and maintain sustainable levels of spending over the medium term (3-5 years).



Governance

Arrangements for ensuring that the body makes appropriate decisions in the right way. This includes arrangements for budget setting and management, risk management, and ensuring the body makes decisions based on appropriate information

We have not identified any risks of significant weaknesses from our initial planning work. We will continue our review of your arrangements, including reviewing your Annual Governance Statement, before we issue our Auditor's Annual Report.



8. Audit logistics and team



Gareth Mills, Key Audit Partner & Engagement Lead



Gareth leads our relationship with you and takes overall responsibility for the delivery of a high quality audit, ensuring the highest professional standards are maintained and a commitment to add value to the Authority. Gareth is the engagement lead for the audit of three of the national parks in England.

Liam Royle, Engagement Manager



Liam plans, manages and leads the delivery of the audit, is your key point of contact for your finance team and is your first point of contact for discussing any issues.

Natalie Faulkner, Engagement In-Charge



Natalie assists in planning, managing and delivering the audit fieldwork, ensuring that the audit is delivered effectively and efficiently. Natalie supervises and coordinates the audit team.

Audited body responsibilities

Where audited bodies do not deliver to the timetable agreed, we need to ensure that this does not impact on audit quality or absorb a disproportionate amount of time, thereby disadvantaging other audits. Where the elapsed time to complete an audit exceeds that agreed due to a client not meeting its obligations we will not be able to maintain a team on site. Similarly, where additional resources are needed to complete the audit due to a client not meeting their obligations we are not able to guarantee the delivery of the audit to the agreed timescales. In addition, delayed audits will incur additional audit fees.

Our requirements

To minimise the risk of a delayed audit, you need to ensure that you:

- produce draft financial statements of good quality by the agreed timetable you have agreed with us, including all notes, the Narrative Report and the Annual Governance Statement
- ensure that good quality working papers are available at the start of the audit, in accordance with the working paper requirements schedule that we have shared with you
- ensure that the agreed data reports are available to us at the start of the audit and are reconciled to the values in the accounts, in order to facilitate our selection of items for testing
- ensure that all appropriate staff are available throughout (or as otherwise agreed) the planned period of the audit
- respond promptly and adequately to audit queries.

9. Audit fees

In 2017, PSAA awarded a contract of audit for the Authority to begin with effect from 2018-19. The fee agreed in the contract was £9,004. Since that time, there have been a number of developments, particularly in relation to the revised Code and ISAs which are relevant for the 2021-22 audit.

Across all sectors and firms, the FRC has set out its expectation of improved financial reporting from organisations and the need for auditors to demonstrate increased scepticism and challenge and to undertake additional and more robust testing, as detailed on page nine in relation to the updated ISA (UK) 540 (revised): Auditing Accounting Estimates and Related Disclosures.

As a firm, we are absolutely committed to meeting the expectations of the FRC with regard to audit quality and public sector financial reporting. Our proposed audit fee for 2021-22 is set out below and has been discussed with the Head of Finance and Operations.

Whilst the level of proposed fee variation is high compared to the PSAA scale fee, it should be noted that the Authority is subject to the full requirements of the Audit Code and the level of audit testing that this entails. This level of required audit work when combined with such a low materiality figure (as set out in section six on page 11) means we have to perform very detailed audit procedures in order to get to a sufficient level of appropriate audit evidence that key areas of your accounts are free from material misstatement (this is particularly relevant in respect of the valuation of your land and buildings and your share of the pension fund deficit).

We will report any changes to our audit fee in our Audit Findings (ISA260) Report later this year. Our fee will be subject to review by PSAA and any variations will require PSAA's approval.

	Actual Fee 2019-20	Actual Fee 2020-21	Proposed fee 2021-22
Authority scale fee set by PSAA	£9,004	£9,004	£9,004
Audit fee variations	£5,663	£7,000	£9,450
Total audit fees (excluding VAT)	£14,667	£16,004	£18,454

Note: DHLUC has set aside £15m of funding to deal with the expected increase in 2021-22 audit fees, a direct response to one of the key findings of the Redmond Review into local authority external audit. National parks have access to this funding to mitigate the direct financial impact on the Authority of this increase in audit fees. The £15m of funding towards additional audit fees is expected to continue in the forthcoming years.

Assumptions

In setting the above fees, we have assumed that the Authority will:

- prepare a good quality set of financial statements, supported by comprehensive and well presented working papers which are ready at the start of the audit
- provide appropriate analysis, support and evidence to support all critical judgements and significant judgements made during the course of preparing the financial statements
- provide early notice of proposed complex or unusual transactions which could have a material impact on the financial statements.

Relevant professional standards

In preparing our fee estimate, we have had regard to all relevant professional standards, including paragraphs 4.1 and 4.2 of the FRC's [Ethical Standard \(revised 2019\)](#) which stipulate that the Engagement Lead (Key Audit Partner) must set a fee sufficient to enable the resourcing of the audit with partners and staff with appropriate time and skill to deliver an audit to the required professional and Ethical standards.

10. Independence and non-audit services

Auditor independence

Ethical Standards and ISA (UK) 260 require us to give you timely disclosure of all significant facts and matters that may bear upon the integrity, objectivity and independence of the firm or covered persons, relating to our independence. We encourage you to contact us to discuss these or any other independence issues with us. We will also discuss with you if we make additional significant judgements surrounding independence matters.

We confirm that there are no significant facts or matters that impact on our independence as auditors that we are required or wish to draw to your attention. We have complied with the Financial Reporting Authority's Ethical Standard (Revised 2019) and we as a firm, and each covered person, confirm that we are independent and are able to express an objective opinion on the financial statements.

Further, we have complied with the requirements of the National Audit Office's Auditor Guidance Note 01 issued in May 2020 which sets out supplementary guidance on ethical requirements for auditors of local public bodies. We confirm that we have implemented policies and procedures to meet the requirements of the Ethical Standard. For the purposes of our audit we have made enquiries of all Grant Thornton UK LLP teams providing services to the Authority.

Other services

No other services provided to the Authority by Grant Thornton were identified.

Any changes and full details of all fees charged for audit related and non-audit related services by Grant Thornton UK LLP and by Grant Thornton International Limited network member Firms will be included in our Audit Findings (ISA260) Report at the conclusion of the audit.

Appendix A: Progress against prior year audit recommendations

We identified the following issues in our 2020-21 audit of the Authority's financial statements, which resulted in two recommendations being reported in our 2020-21 Audit Findings (ISA260) Report. The current update on both the recommendations is shown in the right hand column below.

Assessment	Issue and risk previously communicated in the ISA260 Report (November 2021)	Update from management on actions taken to address the issue
✓	<p>One of the Authority's finance team who regularly posts journals is a "Super User" on the SAP system. Individuals with this level of system access should not ordinarily be posting journals. This is because of the potential risk of elevated privileges being used to make unauthorised changes to the application, business processes, or user accounts by over-riding internal system controls, which could lead to fraud and/or financial misstatement.</p> <p>The Authority must review which staff have "Super User" access on SAP. In order to prevent the risk of elevated privileges being used to make unauthorised changes to the application, business processes, or user accounts by over-riding internal system controls, this should not include any individuals involved in the regular posting of journals.</p>	<p>Management response in November 2021: We will remove the 'super user' powers from the relevant member of staff.</p> <p>Updated management response in May 2022: Following investigation with the SCC systems team, we identified that none of the team member's access gave them "Super User" privileges. Therefore there is no impact on the financial statements and no issue to resolve.</p>
✓	<p>Our walkthrough of the process and controls for the net pension fund liability identified that the cashflow data used by the actuary for their work is sent by the Pension Fund to the actuary directly with no management checks by the Authority. There is a risk of data that does not agree with the Authority's records being submitted to the Actuary and their work being based on inaccurate information as a result.</p> <p>In the future, the Authority's management controls over the pension fund should include agreement of the contribution data sent to the actuary.</p>	<p>Management response in November 2021: We are happy to check this data in future.</p> <p>Updated management response in May 2022: We now receive a report of the cashflow data that goes to the actuary in order that we can provide a robust challenge.</p>
TBC	<p>The Authority does not have a Service Legal Agreement (SLA) in place with Somerset County Council for the provision of Payroll/IT services. The previous SLA was with SouthWest One, an organisation which no longer exists. This potentially exposes the Authority to the potential risk of being unable to resolve any issues or disputes over service delivery which occur.</p> <p>The Authority should agree a new SLA with Somerset CC that reflects the arrangements currently in place.</p>	<p>Management response in November 2021: We will again approach SCC with a view to establishing an SLA. There are doubts over the necessity or additional benefit such a document would bring.</p> <p>Updated management response in May 2022: The relationship with SCC is being reset on 1st April 2023 as the new unitary starts. This will be the opportunity to agree a SLA.</p>

Appendix A: Progress against prior year audit recommendations

Assessment	Issue and risk previously communicated in the ISA260 Report (November 2021)	Update from management on actions taken to address the issue
✓	<p>Our review of cybersecurity arrangements identified that the Authority is relying on Somerset County Council's arrangements in many instances. For example, the Authority does not have a cybersecurity framework in place or management oversight of this area. As there is no current Service Level Agreement in place with Somerset County Council to cover these areas, the Authority should have its own arrangements in place.</p> <p>The Authority should develop its own cybersecurity arrangements and ensure that there is appropriate management oversight of this area.</p>	<p>Management response in November 2021:</p> <p>SCC is only responsible for the payroll and finance system as regards cyber security. It is not accurate to say that the Authority does not have its own cyber security arrangements in place. We have a raft of practices, polices and procedures. We will however seek to put in place a cybersecurity framework with appropriate SLT support and oversight.</p> <p>Updated management response in May 2022:</p> <p>A new three-year ICT strategy is in the process of being drafted and this will have an emphasis on security as a whole; including strengthening our cyber security vision and policy. It is anticipated the Strategy will be in place in Q3 2022, with new policies approved by early Q4 2022.</p>
✓	<p>Our testing of a sample of 15 items of expenditure in 2021-22 for completeness identified an invoice of £3,400 that related to 2020-21 that had not been accrued for. We tested a further sample of 15 items with no significant issues identified. This represents a control failure as this amount should have been accrued for. It also means that expenditure in 2020-21 is understated by £3,400 – which we accept is not material.</p> <p>The Authority should review its procedures to ensure all items that should be accrued for are identified and accounted for in the correct financial year.</p>	<p>Management response in November 2021:</p> <p>We accept that there was an 'old year' invoice which was paid in the new financial year. We have a cut off date to facilitate the early closure of accounts and sometimes this means that invoices are in the wrong year.</p> <p>Updated management response in May 2022:</p> <p>We have firmed up processes for identifying old year invoices. There is always the risk that a few creep under the radar.</p>
✓	<p>Our testing of the useful lives of assets identified two assets (both related to solar panels) that had been removed from the Fixed Asset Register but were still owned by the Authority.</p> <p>We recommend that assets should remain on the Fixed Asset Register until disposed of by the Authority. The Authority should also review asset values and lives when assets that are still in use have been reduced to a £nil net book value.</p>	<p>Management response in November 2021:</p> <p>We will review our asset lives of vehicles, plant and equipment.</p> <p>Updated management response in May 2022:</p> <p>We will carefully consider our depreciation policy in use and look to only write out assets where they have been removed.</p>

Appendix B: Significant improvements from the Financial Reporting Council's (FRC) quality inspection

On 29 October, the FRC published its annual report setting out the findings of its review of the work of local auditors. The report summarises the results of the FRC's inspections of twenty audit files for the last financial year. A link to the report is here: [FRC AQR Major Local Audits October 2021](#)

Grant Thornton are one of seven firms which currently delivers local audit work. Of our 330 local government and NHS audits, 87 are currently defined as 'major audits' which fall within the scope of the AQR. This year, the FRC looked at nine of our audits.

Our file review results

The FRC reviewed nine of our audits this year. It graded six files (67%) as 'Good' and requiring no more than limited improvements. No files were graded as requiring significant improvement, representing an impressive year-on-year improvement. The FRC described the improvement in our audit quality as an 'encouraging response by the firm to the quality findings reported in the prior year.'

Our Value for Money work continues to be delivered to a high standard, with all of the files reviewed requiring no more than limited improvement. We welcome the FRC's findings and conclusions which demonstrate the impressive improvement we have made in audit quality over the past year.

The FRC also identified a number of good practices including effective challenge of management's valuer, use of an auditor's expert to assist with the audit of a highly specialised property valuation, and the extent and timing of involvement by the audit partner on the VFM conclusion.

Our results over the past three years are shown in the table below:

Grade	Number 2018-19	Number 2019-20	Number 2020-21
Good with limited improvements (Grade 1 or 2)	1	1	6
Improvements required (Grade 3)	2	5	3
Significant improvements required (Grade 4)	1	0	0
Total	4	6	9

Our continued commitment to Audit quality and continuous improvement

Our work over the past year has been undertaken during the backdrop of COVID, when the public sector has faced the huge challenge of providing essential services and helping safeguard the public during the pandemic. Our NHS bodies in particular have been at the forefront of the public health crisis. As auditors we have had to show compassion to NHS staff deeply affected by the crisis, whilst staying focused on the principles of good governance and financial management, things which are more important than ever. We are very proud of the way we have worked effectively with audited bodies, demonstrating empathy in our work whilst still upholding the highest audit quality.

Significant improvements from the Financial Reporting Council's (FRC) quality inspection (cont.)

Over the coming year we will make further investments in audit quality including strengthening our quality and technical support functions, and increasing the level of training, support and guidance for our audit teams. We will address the specific improvement recommendations raised by the FRC, including:

- Enhanced training for local auditors on key assumptions within property valuations, and how to demonstrate an increased level of challenge
- Formalising our arrangements for the consideration of complex technical issues by Partner Panels.

As part of our enhanced Value for Money programme, we will focus on identifying the scope for better use of public money, as well as highlighting weaknesses in governance or financial stewardship where we see them.

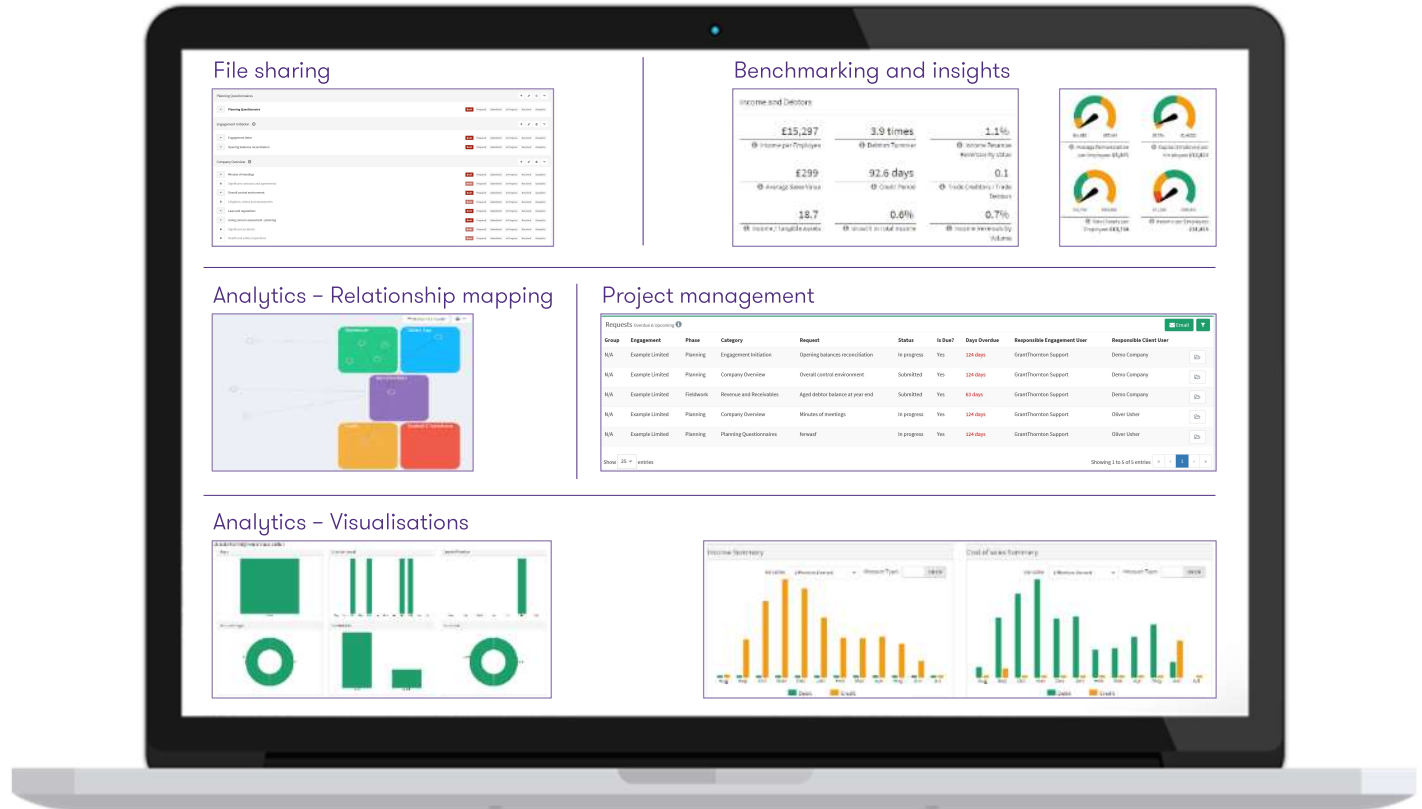
Conclusion

Local audit plays a critical role in the way public sector organisations and society interact, and it depends on the trust and confidence of all those who rely on it. As a firm we're proud to be doing our part to promote good governance, effective stewardship and appropriate use of public funds.

Appendix C: Our digital audit experience

A key component of our overall audit experience is our comprehensive data analytics tool, which is supported by Inflo Software technology. This tool has a number of key functions within our audit process:

Function	Benefits for you
Data extraction	Providing us with your financial information is made easier
File sharing	An easy-to-use, ISO 27001 certified, purpose-built file sharing tool
Project management	Effective management and oversight of requests and responsibilities
Data analytics	Enhanced assurance from access to complete data populations



Grant Thornton's Analytics solution is supported by Inflo Software technology

Our digital audit experience

A key component of our overall audit experience is our comprehensive data analytics tool, which is supported by Inflo Software technology. This tool has a number of key functions within our audit process:



Data extraction

- Real-time access to data
- Easy step-by-step guides to support you upload your data



File sharing

- Task-based ISO 27001 certified file sharing space, ensuring requests for each task are easy to follow
- Ability to communicate in the tool, ensuring all team members have visibility on discussions about your audit, reducing duplication of work



Project management

- Facilitates oversight of requests
- Access to a live request list at all times



Data analytics

- Relationship mapping, allowing understanding of whole cycles to be obtained quickly
- Visualisation of transactions, allowing easy identification of trends and anomalies

How will analytics add value to your audit?

Analytics will add value to your audit in a number of ways. We see the key benefits of extensive use of data analytics within the audit process to be the following:

Improved fraud procedures using powerful anomaly detection

Being able to analyse every accounting transaction across your business enhances our fraud procedures. We can immediately identify high risk transactions, focusing our work on these to provide greater assurance to you, and other stakeholders.

Examples of anomaly detection include analysis of user activity, which may highlight inappropriate access permissions, and reviewing seldom used accounts, which could identify efficiencies through reducing unnecessary codes and therefore unnecessary internal maintenance.

Another product of this is identification of issues that are not specific to individual postings, such as training requirements being identified for members of staff with high error rates, or who are relying on use of suspense accounts.

More time for you to perform the day job

Providing all this additional value does not require additional input from you or your team. In fact, less of your time is required to prepare information for the audit and to provide supporting information to us.

Complete extracts from your general ledger will be obtained from the data provided to us and requests will therefore be reduced.

We provide transparent project management, allowing us to seamlessly collaborate with each other to complete the audit on time and around other commitments.

We will both have access to a dashboard which provides a real-time overview of audit progress, down to individual information items we need from each other. Tasks can easily be allocated across your team to ensure roles and responsibilities are well defined.

Using filters, you and your team will quickly be able to identify actions required, meaning any delays can be flagged earlier in the process. Accessible through any browser, the audit status is always available on any device providing you with the information to work flexibly around your other commitments.



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Informing the audit risk assessment for Exmoor National Park Authority 2021/22

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The contents of this report relate only to the matters which have come to our attention, which we believe need to be reported to you as part of our audit process. It is not a comprehensive record of all the relevant matters, which may be subject to change, and in particular we cannot be held responsible to you for reporting all of the risks which may affect your business or any weaknesses in your internal controls. This report has been prepared solely for your benefit and should not be quoted in whole or in part without our prior written consent. We do not accept any responsibility for any loss occasioned to any third party acting, or refraining from acting on the basis of the content of this report, as this report was not prepared for, nor intended for, any other purpose.

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Purpose

The purpose of this report is to contribute towards the effective two-way communication between Exmoor National Park Authority's external auditors and Exmoor National Park Authority, as 'those charged with governance'. The report covers some important areas of the auditor risk assessment where we are required to make inquiries of the Authority under auditing standards.

Background

Under International Standards on Auditing (UK), (ISA(UK)) auditors have specific responsibilities to communicate with the Authority. ISA(UK) emphasise the importance of two-way communication between the auditor and the Authority and also specify matters that should be communicated.

This two-way communication assists both the auditor and the Authority in understanding matters relating to the audit and developing a constructive working relationship. It also enables the auditor to obtain information relevant to the audit from the Authority and supports the Authority in fulfilling its responsibilities in relation to the financial reporting process.

Communication

As part of our risk assessment procedures we are required to obtain an understanding of management processes and the Authority's oversight of the following areas:

- General Enquiries of Management
- Fraud,
- Laws and Regulations,
- Related Parties,
- Going Concern, and
- Accounting Estimates.

Purpose

This report includes a series of questions on each of these areas and the response we have received from Exmoor National Park Authority's management. The Authority should consider whether these responses are consistent with its understanding and whether there are any further comments it wishes to make.

General Enquiries of Management

Question	Management response
<p>1. What do you regard as the key events or issues that will have a significant impact on the financial statements for 2021/22?</p>	<p>Macro economic events such as the pandemic, the return of inflation and the war in Ukraine may well impact upon the accounts.</p>
<p>2. Have you considered the appropriateness of the accounting policies adopted by Exmoor National Park Authority? Have there been any events or transactions that may cause you to change or adopt new accounting policies? If so, what are they?</p>	<p>Yes. No although this will be kept under review as the accounts closure process continues.</p>
<p>3. Is there any use of financial instruments, including derivatives? If so, please explain</p>	<p>None.</p>
<p>4. Are you aware of any significant transaction outside the normal course of business? If so, what are they?</p>	<p>Not as such though we have planted a new wood (Bye Common). The FiPL scheme begun this year also.</p>

General Enquiries of Management

Question	Management response
5. Are you aware of any changes in circumstances that would lead to impairment of non-current assets? If so, what are they?	We have informed the valuer of the approximate impact of the winter storms on woodland. We have yet to see if this will have an impact on values.
6. Are you aware of any guarantee contracts? If so, please provide further details	No.
7. Are you aware of the existence of loss contingencies and/or un-asserted claims that may affect the financial statements? If so, please provide further details	No.
8. Other than in house solicitors, can you provide details of those solicitors utilised by Exmoor National Park Authority during the year. Please indicate where they are working on open litigation or contingencies from prior years?	We use Devon County Council. I believe they have already been approached.

General Enquiries of Management

Question	Management response
9. Have any of the Exmoor National Park Authority's service providers reported any items of fraud, non-compliance with laws and regulations or uncorrected misstatements which would affect the financial statements? If so, please provide further details	No
10. Can you provide details of other advisors consulted during the year and the issue on which they were consulted?	We use external valuers, actuaries and this year also Rural Surveyors (NPS).
11. Have you considered and identified assets for which expected credit loss provisions may be required under IFRS 9, such as debtors (including loans) and investments? If so, please provide further details	No.

Fraud

Matters in relation to fraud

ISA (UK) 240 covers auditors responsibilities relating to fraud in an audit of financial statements.

The primary responsibility to prevent and detect fraud rests with both the Authority and management. Management, with the oversight of the Authority, needs to ensure a strong emphasis on fraud prevention and deterrence and encourage a culture of honest and ethical behaviour. As part of its oversight, the Authority should consider the potential for override of controls and inappropriate influence over the financial reporting process.

As Exmoor National Park Authority's external auditor, we are responsible for obtaining reasonable assurance that the financial statements are free from material misstatement due to fraud or error. We are required to maintain professional scepticism throughout the audit, considering the potential for management override of controls.

As part of our audit risk assessment procedures we are required to consider risks of fraud. This includes considering the arrangements management has put in place with regard to fraud risks including:

- assessment that the financial statements could be materially misstated due to fraud,
- process for identifying and responding to risks of fraud, including any identified specific risks,
- communication with the Authority regarding its processes for identifying and responding to risks of fraud, and
- communication to employees regarding business practices and ethical behaviour.

We need to understand how the Authority oversees the above processes. We are also required to make inquiries of both management and the Authority as to their knowledge of any actual, suspected or alleged fraud. These areas have been set out in the fraud risk assessment questions below together with responses from Exmoor National Park Authority's management.

Fraud risk assessment

Question	Management response
<p>1. Has Exmoor National Park Authority assessed the risk of material misstatement in the financial statements due to fraud?</p> <p>How has the process of identifying and responding to the risk of fraud been undertaken and what are the results of this process?</p> <p>How do the Authority's risk management processes link to financial reporting?</p>	<p>Yes.</p> <p>No frauds have been identified.</p> <p>Internal Audit, internal controls, budget monitoring and contract management would identify fraud and we would therefore know the impact on financial statements.</p>
<p>2. What have you determined to be the classes of accounts, transactions and disclosures most at risk to fraud?</p>	<p>None more than any other.</p>
<p>3. Are you aware of any instances of actual, suspected or alleged fraud, errors or other irregularities either within Exmoor National Park Authority as a whole, or within specific departments since 1 April 2021? If so, please provide details</p>	<p>No</p>

Fraud risk assessment

Question	Management response
4. As a management team, how do you communicate risk issues (including fraud) to those charged with governance?	We produce an annual Risk Management paper and the Authority receive summary reports from Internal and External Audit.
5. Have you identified any specific fraud risks? If so, please provide details Do you have any concerns there are areas that are at risk of fraud? Are there particular locations within Exmoor National Park Authority where fraud is more likely to occur?	No no no
6. What processes do Exmoor National Park Authority have in place to identify and respond to risks of fraud?	Internal Audit, internal controls, budget monitoring and contract management would identify fraud and we would therefore know the impact on financial statements. We also ensure that staff are fully committed to the importance of good governance.

Fraud risk assessment

Question	Management response
<p>7. How do you assess the overall control environment for Exmoor National Park Authority, including:</p> <ul style="list-style-type: none">• the existence of internal controls, including segregation of duties; and• the process for reviewing the effectiveness the system of internal control? <p>If internal controls are not in place or not effective where are the risk areas and what mitigating actions have been taken?</p> <p>What other controls are in place to help prevent, deter or detect fraud?</p> <p>Are there any areas where there is a potential for override of controls or inappropriate influence over the financial reporting process (for example because of undue pressure to achieve financial targets)? If so, please provide details</p>	<p>excellent excellent</p> <p>They are</p> <p>Internal Audit, internal controls, budget monitoring and contract management would identify fraud and we would therefore know the impact on financial statements.</p> <p>Senior management are fully committed to the principles of internal control and so would not exert pressure to achieve a particular result. We are also not reliant on any financial ratios been achieved to access finance of any kid.</p>
<p>8. Are there any areas where there is potential for misreporting? If so, please provide details</p>	<p>no</p>

Fraud risk assessment

Question	Management response
<p>9. How does Exmoor National Park Authority communicate and encourage ethical behaviours and business processes of it's staff and contractors?</p> <p>How do you encourage staff to report their concerns about fraud?</p> <p>What concerns are staff expected to report about fraud? Have any significant issues been reported? If so, please provide details</p>	<p>We send out an e-mail once a year to all staff that remind them of the importance of good governance and attach links to key policies. The tender process has built in key checks for contractors.</p> <p>We have a whistle blowing policy.</p> <p>Staff would be expected to report incidences of money going missing or attempts to deceive by contractors. No Issues have been reported.</p>
<p>10. From a fraud and corruption perspective, what are considered to be high-risk posts?</p> <p>How are the risks relating to these posts identified, assessed and managed?</p>	<p>All posts in finance are high risk.</p> <p>Separation of powers, internal controls and internal audit.</p>
<p>11. Are you aware of any related party relationships or transactions that could give rise to instances of fraud? If so, please provide details</p> <p>How do you mitigate the risks associated with fraud related to related party relationships and transactions?</p>	<p>no</p> <p>We would ensure that additional checks or sign offs were introduced in the case of related parties.</p>

Fraud risk assessment

Question	Management response
<p>12. What arrangements are in place to report fraud issues and risks to the Authority?</p> <p>How does the Authority exercise oversight over management's processes for identifying and responding to risks of fraud and breaches of internal control?</p> <p>What has been the outcome of these arrangements so far this year?</p>	<p>The risk of fraud and financial misgovernance is identified to members annually in the annual review of risk management.</p> <p>The Authority establish resources, policies and have an oversight over the systems of internal control.</p> <p>Members have noted the work undertaken. No frauds have been identified.</p>
<p>13. Are you aware of any whistle blowing potential or complaints by potential whistle blowers? If so, what has been your response?</p>	<p>no</p>
<p>14. Have any reports been made under the Bribery Act? If so, please provide details</p>	<p>no</p>

Law and regulations

Matters in relation to laws and regulations

ISA (UK) 250 requires us to consider the impact of laws and regulations in an audit of the financial statements.

Management, with the oversight of the Authority, is responsible for ensuring that Exmoor National Park Authority's operations are conducted in accordance with laws and regulations, including those that determine amounts in the financial statements.

As auditor, we are responsible for obtaining reasonable assurance that the financial statements are free from material misstatement due to fraud or error, taking into account the appropriate legal and regulatory framework. As part of our risk assessment procedures we are required to make inquiries of management and the Authority as to whether the body is in compliance with laws and regulations. Where we become aware of non-compliance or suspected non-compliance we need to gain an understanding of the non-compliance and the possible effect on the financial statements.

Risk assessment questions have been set out below together with responses from management.

Impact of laws and regulations

Question	Management response
<p>1. How does management gain assurance that all relevant laws and regulations have been complied with?</p> <p>What arrangements does Exmoor National Park Authority have in place to prevent and detect non-compliance with laws and regulations?</p> <p>Are you aware of any changes to the Authority's regulatory environment that may have a significant impact on the Authority's financial statements?</p>	<p>See below, plus also the work of engineering inspections, internal audit and we have a professional relationship with DCC Procurement.</p> <p>We work closely with DCC Legal Services to check our understanding of the legal position of a variety of things. This includes procurement, governance or new legislation.</p> <p>no</p>
<p>2. How is the Authority provided with assurance that all relevant laws and regulations have been complied with?</p>	<p>The Authority oversee the systems of internal control and receive reports.</p>
<p>3. Have there been any instances of non-compliance or suspected non-compliance with laws and regulation since 1 April 2021 with an on-going impact on the 2021/22 financial statements? If so, please provide details</p>	<p>no</p>
<p>4. Are there any actual or potential litigation or claims that would affect the financial statements? If so, please provide details</p>	<p>No, planning claims are ongoing.</p>

Impact of laws and regulations

Question	Management response
5. What arrangements does Exmoor National Park Authority have in place to identify, evaluate and account for litigation or claims?	We would know if someone was suing us. We would set aside sums at that point.
6. Have there been any reports from other regulatory bodies, such as HM Revenues and Customs, which indicate non-compliance? If so, please provide details	no

Related Parties

Matters in relation to Related Parties

Exmoor National Park Authority are required to disclose transactions with bodies/individuals that would be classed as related parties. These may include:

- bodies that directly, or indirectly through one or more intermediaries, control, or are controlled by Exmoor National Park Authority;
- associates;
- joint ventures;
- a body that has an interest in the authority that gives it significant influence over the Authority;
- key management personnel, and close members of the family of key management personnel, and
- post-employment benefit plans (pension fund) for the benefit of employees of the Authority, or of any body that is a related party of the Authority.

A disclosure is required if a transaction (or series of transactions) is material on either side, i.e. if a transaction is immaterial from the Authority's perspective but material from a related party viewpoint then the Authority must disclose it.

ISA (UK) 550 requires us to review your procedures for identifying related party transactions and obtain an understanding of the controls that you have established to identify such transactions. We will also carry out testing to ensure the related party transaction disclosures you make in the financial statements are complete and accurate.

Related Parties

Question	Management response
<p>1. Have there been any changes in the related parties including those disclosed in Exmoor National Park Authority's 2020/21 financial statements?</p> <p>If so please summarise:</p> <ul style="list-style-type: none">• the nature of the relationship between these related parties and Exmoor National Park Authority• whether Exmoor National Park Authority has entered into or plans to enter into any transactions with these related parties• the type and purpose of these transactions	No
<p>2. What controls does Exmoor National Park Authority have in place to identify, account for and disclose related party transactions and relationships?</p>	We are a very small organisation so would know of related parties.
<p>3. What controls are in place to authorise and approve significant transactions and arrangements with related parties?</p>	We would insist upon additional sign offs or steps in the event of related parties.
<p>4. What controls are in place to authorise and approve significant transactions outside of the normal course of business?</p>	I'm not sure we have any.

Going Concern

Matters in relation to Going Concern

The audit approach for going concern is based on the requirements of ISA (UK) 570, as interpreted by Practice Note 10: Audit of financial statements and regularity of public sector bodies in the United Kingdom (Revised 2020). It also takes into account the National Audit Office's Supplementary Guidance Note (SGN) 01: Going Concern – Auditors' responsibilities for local public bodies.

Practice Note 10 confirms that in many (but not all) public sector bodies, the use of the going concern basis of accounting is not a matter of significant focus of the auditor's time and resources because the applicable financial reporting frameworks envisage that the going concern basis for accounting will apply where the body's services will continue to be delivered by the public sector. In such cases, a material uncertainty related to going concern is unlikely to exist.

For this reason, a straightforward and standardised approach to compliance with ISA (UK) 570 will often be appropriate for public sector bodies. This will be a proportionate approach to going concern based on the body's circumstances and the applicable financial reporting framework. In line with Practice Note 10, the auditor's assessment of going concern should take account of the statutory nature of the body and the fact that the financial reporting framework for local government bodies presume going concern in the event of anticipated continuation of provision of the services provided by the body. Therefore, the public sector auditor applies a 'continued provision of service approach', unless there is clear evidence to the contrary. This would also apply even where those services are planned to transfer to another body, as in such circumstances, the underlying services will continue.

For many public sector bodies, the financial sustainability of the body and the services it provides are more likely to be of significant public interest than the application of the going concern basis of accounting. Financial sustainability is a key component of value for money work and it is through such work that it will be considered.

Going Concern

Question	Management response
<p>1. What processes and controls does management have in place to identify events and / or conditions which may indicate that the statutory services being provided by Exmoor National Park Authority will no longer continue?</p>	<p>We monitor the policy and legislative environment and have the opportunity to feed in to consultations. Please note the government response to the Landscape Review.</p>
<p>2. Are management aware of any factors which may mean for Exmoor National Park Authority that either statutory services will no longer be provided or that funding for statutory services will be discontinued? If so, what are they?</p>	<p>No, see above. The initial response of the government to the Landscape Review does not envisage any significant changes to structures.</p>
<p>3. With regard to the statutory services currently provided by Exmoor National Park Authority, does Exmoor National Park Authority expect to continue to deliver them for the foreseeable future, or will they be delivered by related public authorities if there are any plans for Exmoor National Park Authority to cease to exist?</p>	<p>No significant changes expected.</p>
<p>4. Are management satisfied that the financial reporting framework permits Exmoor National Park Authority to prepare its financial statements on a going concern basis? Are management satisfied that preparing financial statements on a going concern basis will provide a faithful representation of the items in the financial statements?</p>	<p>Yes</p> <p>Yes</p>

Accounting estimates

Matters in relation to accounting estimates

ISA (UK) 540 (Revised December 2018) requires auditors to understand and assess a body's internal controls over accounting estimates, including:

- The nature and extent of oversight and governance over management's financial reporting process relevant to accounting estimates;
- How management identifies the need for and applies specialised skills or knowledge related to accounting estimates;
- How the body's risk management process identifies and addresses risks relating to accounting estimates;
- The body's information system as it relates to accounting estimates;
- The body's control activities in relation to accounting estimates; and
- How management reviews the outcomes of previous accounting estimates.

As part of this process auditors also need to obtain an understanding of the role of those charged with governance, which is particularly important where the estimates have high estimation uncertainty, or require significant judgement.

Specifically do Authority members:

- Understand the characteristics of the methods and models used to make the accounting estimates and the risks related to them;
- Oversee management's process for making accounting estimates, including the use of models, and the monitoring activities undertaken by management; and
- Evaluate how management made the accounting estimates?

We would ask the Authority to satisfy itself that the arrangements for accounting estimates are adequate.

Accounting Estimates - General Enquiries of Management

Question	Management response
1. What are the classes of transactions, events and conditions, that are significant to the financial statements that give rise to the need for, or changes in, accounting estimate and related disclosures?	Valuations of PPE and the Pension Fund, and depreciation are most related to accounting estimates.
2. How does the Authority's risk management process identify and address risks relating to accounting estimates?	By ensuring that professional advice is received and there is robust internal challenge.
3. How does management identify the methods, assumptions or source data, and the need for changes in them, in relation to key accounting estimates?	Through best practice, peer review and internal challenge.
4. How do management review the outcomes of previous accounting estimates?	Leadership review the draft accounts. This includes key estimates.
5. Were any changes made to the estimation processes in 2021/22 and, if so, what was the reason for these?	No. This is the second year running we are using NPS for property valuations.

Accounting Estimates - General Enquiries of Management

Question	Management response
6. How does management identify the need for and apply specialised skills or knowledge related to accounting estimates?	Where internal expertise is available and there is sufficient separation of duties then we would look to use internal expertise. If not then we would go to the market.
7. How does the Authority determine what control activities are needed for significant accounting estimates, including the controls at any service providers or management experts?	The Authority establish the overarching system by which financial reporting is delivered. They receive reports and challenge those presenting their findings.
8. How does management monitor the operation of control activities related to accounting estimates, including the key controls at any service providers or management experts?	Senior staff receive the key reports. This are challenged where results appear unclear or erratic.
9. What is the nature and extent of oversight and governance over management's financial reporting process relevant to accounting estimates, including: <ul data-bbox="98 846 697 991" style="list-style-type: none">- Management's process for making significant accounting estimates- The methods and models used- The resultant accounting estimates included in the financial statements.	LT will discuss the results of key valuations. This includes pension fund and PPE. LT would be informed if the models or approaches were subject to challenge.

Accounting Estimates - General Enquiries of Management

Question	Management response
10. Are management aware of any transactions, events, conditions (or changes in these) that may give rise to recognition or disclosure of significant accounting estimates that require significant judgement (other than those in Appendix A)? If so, what are they?	no
11. Why are management satisfied that their arrangements for the accounting estimates, as detailed in Appendix A, are reasonable?	yes
12. How is the Authority provided with assurance that the arrangements for accounting estimates are adequate ?	Via the external accounts process and via challenge at Committee.

Appendix A Accounting Estimates

Estimate	Method / model used to make the estimate	Controls used to identify estimates	Whether management have used an expert	Underlying assumptions: - Assessment of degree of uncertainty - Consideration of alternative estimates	Has there been a change in accounting method in year?
Land and buildings valuations	Rics guidance.	Reports received by head of Finance and Estates Team. They are assessed for erratic answers.	external	These are clearly specified.	No
Depreciation	Estimated life spans.	These are assessed to see if the asset is removed before or after the asset is written down.	internal	We have the ongoing opportunity to assess the accuracy of these.	No
Valuation of defined benefit net pension fund liabilities	As stated in the report.	Professional actuarial standards and external audit.	external	These are clearly specified.	No
Accruals	We have an established practice for identifying accruals.	Mis accruals are identified.	internal	These have a high degree of certainty.	No
Provisions	Oversight and aged debt reporting.	Management oversight and budget monitoring.	internal	As a small body we identify the need for provisions swiftly and clearly. There is no space to hide.	No



EXMOOR NATIONAL PARK AUTHORITY

14 June 2022

EXMOOR NATIONAL PARK AUTHORITY LOCAL PLAN REVIEW

Report of the Head of Strategy and Performance

Purpose of Report: To present to Members the results of the five-year policy check of the Exmoor National Park Local Plan 2011-2031

RECOMMENDATIONS: The Authority is recommended to:

1. NOTE the results of the five-year policy check of the Local Plan
2. AGREE with the conclusions of the policy check that a review of the Local Plan is not required
3. AGREE to progress work to address points raised during the review through additional guidance, communications and partnership working (as set out in Section 4)

Authority Priority: The five-year review of the Local Plan is identified as a priority action in the Exmoor National Park Authority Corporate Plan 2022-23, and links to the delivery of the corporate priority around developing and maintaining effective and efficient services.

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

The equality impact of the recommendations of this report has been assessed as follows: There are no foreseen adverse impacts on any protected group(s).

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

Financial and Risk implications: The five-year review of the Local Plan is a legal requirement requiring considerable work with related expenditure. Care has been taken to ensure that all necessary aspects of the review process have been followed.

1. Background

- 1.1 All Local Planning Authorities are legally¹ required to undertake a review of their Local Plans to assess whether they need updating at least once every five years, and should then be updated as necessary. The Exmoor National Park Local Plan was adopted in July 2017, and the 5-year review needs to be completed by July 2022.
- 1.2 Exmoor National Park Authority (ENPA) carried out a review of the Local Plan to establish whether evidence suggested that a partial or complete review of the Local Plan is needed or whether the plan and policies remain effective and no review is required at the current time².

2. Review process

- 2.1 Details of the review process are set out in **Appendix 1**. This included a review of national policy, updating evidence including on local housing need, discussions with Duty to Co-operate partners, and an assessment of monitoring and appeals performance. A stakeholder workshop was held to discuss the interim conclusions of the review, and an online survey also gathered views. Internal discussions were held with ENPA Officers and Members.
- 2.2 The outcomes of the review process are set out in Appendix 1 (Local Plan 5-Year Review Summary Report) and three accompanying **Topic Papers**, on the Environment, Housing and Community, and Economy. These four documents are all available on the ENPA website along with a summary of the stakeholder workshop discussions and analysis of the online survey responses³.

3 Review conclusions

- 3.1 The conclusions drawn by Officers from the review process are that the Local Plan policies remain effective and that a full or partial review of the Plan is not needed. The reasoning for these conclusions is as follows:
 - A review of national policy and legislation was carried out using the most recent Planning Advisory Service checklist of National Planning Policy Framework requirements, which demonstrated that the Local Plan is still policy compliant⁴.
 - Updated evidence on local housing need and monitoring demonstrated that the Local Plan housing strategy and policies are still appropriate to the needs of local communities. A number of delivery issues have been identified but these do not require policy change, and some are unrelated to planning
 - Analysis of appeal decisions shows no reason to suggest there is a need to review policies as decisions continue to support development plan policies.
 - Monitoring implementation of the Plan does not indicate that there are significant delivery issues related to any of the policies
 - Assessment of local circumstances and priorities has not identified any new social, environmental or economic issues that suggest changes to the Plan are required, and it is considered that the policies are sufficiently flexible to

¹ Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012)

² NPPG Paragraph: 064 Reference ID: 61-064-20190315 Revision date: 15 03 2019

³ [Exmoor - Exmoor National Park Local Plan 5-Year Review \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk/exmoor-national-park-local-plan-5-year-review)

⁴ [Exmoor - Exmoor National Park Local Plan 5-Year Review \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk/exmoor-national-park-local-plan-5-year-review)

respond to future changes such as economic changes following covid and the UK's exit from the European Union

- Discussions with Duty to Co-operate partners have not identified any strategic priorities or policies that require review, and this has been confirmed in Statements of Common Ground.

4 Next Steps

- 4.1 Whilst Officer's conclusions are that a review of the Plan is not needed, a number of areas have been identified for further action including:
- Housing and Community: actions to address concerns over affordable housing delivery including guidance for applicants and ongoing partnership working.
 - Environment: guidance on design, sustainability/climate change and biodiversity net gain, and updating local validation requirements.
 - Economy: continued partnership working including through Rural Enterprise Exmoor.
- 4.2 If Members agree with the recommendation not to trigger a review of the Plan, then it is proposed to investigate these and prepare a programme of further work, which will be brought back to the Authority in August 2022.
- 4.3 However, if a decision were taken to review the Plan, then further work would be needed to scope the review and to prepare a project plan and updated Local Development Scheme. These would be brought back to Members in due course.

Clare Reid
Head of Strategy and Performance
June 2022

Ruth McArthur
Policy & Community Manager

EXMOOR NATIONAL PARK LOCAL PLAN 5 YEAR REVIEW

SUMMARY REPORT MAY 2022

1. Background & Purpose of the Review

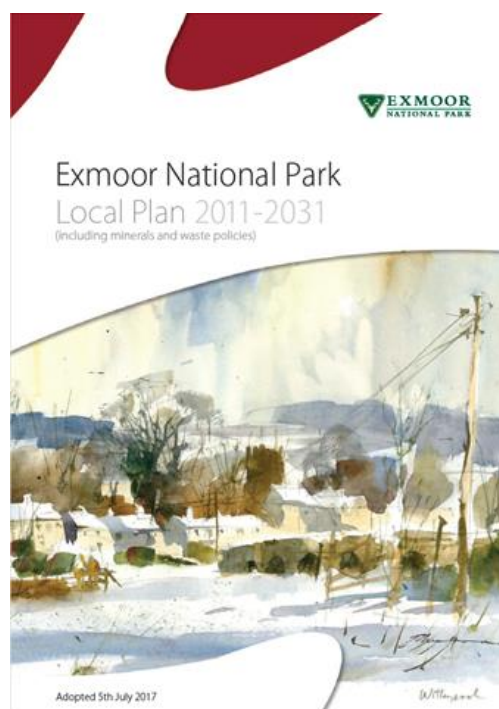
All Local Planning Authorities are legally¹ required to undertake a review of their Local Plans to assess whether they need updating at least once every five years, and should then be updated as necessary. The Exmoor National Park Local Plan was adopted in July 2017, and the 5 year review needs to be completed by July 2022. The National Planning Policy Framework (NPPF) sets out the requirements for the review:

Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future. (para 33)

Planning Practice Guidance (PPG)² provides advice on what authorities can consider when reviewing a plan. In addition, the Planning Advisory Service (PAS) has published the Local Plan Route Mapper guidance to assist Local Planning Authorities (LPAs) in undertaking plan reviews and this has also been used to inform the review process.³

Exmoor National Park Authority is undertaking a review of the Local Plan to establish whether evidence suggests that a partial or complete review of the Local Plan is needed. It is important to emphasise from the outset that this does not automatically mean a full or partial review of the Local Plan needs to be carried out: the purpose of the review process is to ensure that a plan and the policies within remains effective and to establish whether any changes are needed⁴.

The outcomes of the review process are set out in this paper and three accompanying **Topic Papers**, on the Environment, Housing and Community, and Economy. The review is an ongoing process and the topic papers will be updated and added to following the workshop.



¹ Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012)

² NPPG, Plan making, Plan reviews, paragraphs 062 to 070 (reviewed Oct 2019)

³ PAS Local Plan Route Mapper 2021 & [Toolkit Part 1: Local Plan Review 2021](#)

⁴ NPPG Paragraph: 064 Reference ID: 61-064-20190315 Revision date: 15 03 2019

2. Approach

In determining whether a Local Plan needs to be updated, there are several different aspects to be considered:

- Follow the latest national guidance and legislative requirements for Local Plan Reviews⁵
- Consider changes in national policy and if the Local Plan is still policy compliant
- Look at what monitoring is telling us about the effectiveness of the current policies
- Research and understand the implications of new and updated evidence
- Carry out a review of housing delivery as required by Local Plan Policy M1-S1
- Consider changes to local circumstances, such as a change in local affordable housing need
- Check whether issues have arisen that may impact on the deliverability of Local Plan objectives and policies, particularly in relation to delivery of local need affordable housing, including significant economic changes that may impact on the viability of housing delivery
- Consider ENPA's appeals performance and whether this suggests specific policies need to be reviewed where appeals are being lost
- Explore whether any new social, environmental or economic priorities may have arisen
- Consider cross-boundary issues with neighbouring authorities and other strategic priorities with relevant statutory / partner organisations

It is important to also note that there are other issues to be taken into consideration when conducting the review. One of these is the context of changes to the planning system as part of the 'Levelling Up and Regeneration Bill'.⁶ The Bill proposes changes to the planning system but these changes will not be introduced within the timeframe of this review process. ENPA has therefore continued to follow current requirements for the review.

3. National Policy Check and Evidence Review

Officers have checked that adopted plan policies still reflect current national planning policy including requirements in the 2021 National Planning Policy Framework (NPPF).⁷ The analysis has focused on changes since the 2012 NPPF because an independent inspector concluded that the Exmoor Local Plan policies were in line with the 2012 NPPF and much of the 2021 NPPF has been carried forward from 2012.

New and updated evidence has also been reviewed including on the economy, housing, biodiversity, historic environment and climate. An update of local housing need was commissioned to inform the review and Local Plan monitoring as required under policy M1-S1. Recent guidance⁸ from the Planning Advisory Service has encouraged LPAs to consider the proportionality of the evidence base needed to support a Local Plan. It is the LPA's responsibility to produce the necessary evidence, but this will vary according to the local area and issues being addressed. The same principles apply to the Local Plan review process⁹.

⁵ Some of these are set out in PPG Paragraph: 065 Reference ID: 61-065-20190723

⁶ [Levelling-up and Regeneration Bill - Parliamentary Bills - UK Parliament](#)

⁷ Exmoor National Park Local Plan 5-Year Review: National Policy Checklist [Exmoor - Exmoor National Park Local Plan 5-Year Review \(exmoor-nationalpark.gov.uk\)](#)

⁸ [Local Plan Route Mapper & Toolkit - reviewing and updating local plan policies | Local Government Association](#)

⁹ Paragraph: 068 Reference ID: 61-068-20190723 Revision date: 23 07 2019

4. The Exmoor National Park Authority Monitoring Report (AMR)

The Local Plan policies are monitored through the Authority Monitoring Report. Data is gathered on monitoring indicators linked to the objectives and the Plan's policies. Since Local Plan adoption, AMRs have been published for 2017/18 - 2018/19¹⁰. The 2019/20 and 2020/21 AMR is nearing completion. Relevant data is summarised in the Topic Papers and a 2019-21 Interim Summary is available on the ENPA website¹¹.

5. Duty to Co-operate

A Duty to Co-operate meeting was held with four local authority partners on 27 September 2021. No significant issues with the current adopted Local Plan environment policies were identified at the meeting. A number of topics were discussed and are detailed in the Topic Papers.

Various points were identified to be taken forward as a helpful basis for future discussions but were not considered to require an immediate review of the Local Plan policies. It is recognised that Duty to Cooperate discussions are ongoing and that these matters and others will continue to be important considerations for future co-operation and to inform plan making. Statements of Common Ground have been signed by local authority partners who attended the meeting¹².

Additionally, there has been engagement with statutory consultees including Natural England, Historic England, the Marine Management Organisation, and the Heart of the South West Local Enterprise Partnership. Responses from engagement with statutory consultees are summarised in this summary and individual topic papers¹³.

A response to the online survey was received from the Marine Management Organisation (MMO) which highlighted the adoption of the South West Inshore and Offshore Marine Plan in 2021.¹⁴ The MMO noted that:

- All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan, in this case the South West Inshore and Offshore Marine Plan, or the UK Marine Policy Statement (MPS) unless relevant considerations indicate otherwise. Since the ENPA Local Plan was published prior to the plan creation, it would be important to consider the South West Marine Plan within a review going forward.

Exmoor National Park Authority officers have considered the 2021 South West Inshore and Offshore Marine Plan – ENPA had previously responded to consultations on the draft Plan. The UK Marine Policy Statement was published in 2011 and therefore predated the now adopted Exmoor National Park Local Plan. There are no proposals in the Marine Plan which apply specifically to Exmoor National Park. Adopted Exmoor National Park Local Plan policies are considered to provide

¹⁰ [Exmoor - Annual Monitoring Reports \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk/exmoor-national-park-authority-monitoring-reports)

¹¹ Exmoor National Park Authority Monitoring Report 2019-21 Interim Summary [Exmoor - Exmoor National Park Local Plan 5-Year Review \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk/exmoor-national-park-local-plan-5-year-review)

¹² Statements of Common Ground [Exmoor - Exmoor National Park Local Plan 5-Year Review \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk/exmoor-national-park-local-plan-5-year-review)

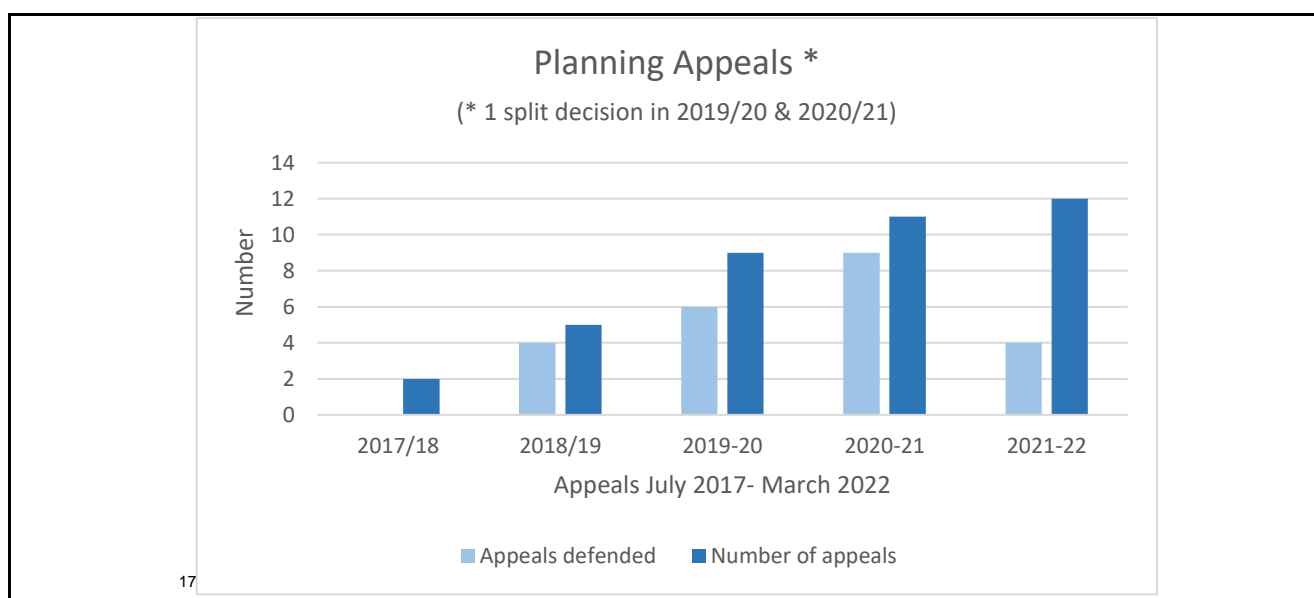
¹³ [Exmoor - Exmoor National Park Local Plan 5-Year Review \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk/exmoor-national-park-local-plan-5-year-review)

¹⁴ [The South West Marine Plans Documents - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/98482/south-west-marine-plans-documents)

sufficient flexibility to enable consideration of proposals in the context of the National Park designation and therefore officers do not consider that a change to Exmoor National Park Local Plan policies is needed in the light of the adoption of the South West Inshore and Offshore Marine Plan.

6. Review of Appeal Decisions and Development Management Comments

Officers have analysed planning and enforcement appeal decisions from Local Plan adoption to end March 2022¹⁵. The number of appeals has risen from a low number but this has not been a significant increase. There have been two 'split' appeal decisions since the Local Plan was adopted (allowing and dismissing different aspects of an appeal). In the graph below, these have been included as one appeal in the number of appeals for each of the two relevant years. There has been no significant change in appeals related to specific policy areas. Analysis of 'allowed' appeals 2017-2022 does not indicate that policies should be reviewed¹⁶.



Discussions have also been held with the Authority's Development Management team to consider their comments on how the policies are being implemented when determining planning applications or making recommendations for Planning Committee. Further discussions were also held to consider the implications of changes in permitted development that have been brought in since the Local Plan was adopted.

7. Stakeholder Engagement

The NPPF does not place any requirements on local planning authorities regarding stakeholder engagement during any 5-Year Local Plan review process. However, as the purpose of plan-making

¹⁵ Appeal Decisions in Exmoor National Park July 2017-March 2022 [Exmoor - Exmoor National Park Local Plan 5-Year Review \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk) Appeals excluded for which Local Plan policies did not apply.

¹⁶ Exmoor National Park Planning and Enforcement Allowed Appeals 2017-2022 [Exmoor - Exmoor National Park Local Plan 5-Year Review \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk)

is to *'provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings'* (NPPF para 15), it is important to gather stakeholder views on the current Local Plan and the need to review all or some of the policies.

Stakeholder Workshop

A stakeholder online event was held on 2nd December 2021. All those on the Local Plan contacts database were invited to the workshop, along with representatives from Exmoor's parish and town councils. 29 people attended the workshop representing a range of organisations, local authorities, parish/town councils or as individuals. ENPA members and officers also attended.

Background and a progress update on the Local Plan 5-Year Review were presented followed by a series of workshops to hear views on the Plan. Participants were divided into three groups to ensure everyone had an opportunity to participate in a discussion on every topic. The workshop considered a series of questions. A summary of issues raised through the workshop is available¹⁸.

A number of areas for future work including possible planning guidance were also discussed. Officers considered the comments and reported these to Members in December 2021.

Online Survey

An online survey was conducted following the workshop to gather views and enable those who were not able to attend the workshop to participate in the review. The questions were linked to those posed at the stakeholder workshop focused on the three topics, with an opportunity to raise other issues. The survey was available for six weeks from 11th January to 28th February 2022. 33 respondents commented on the online survey which, together with additional responses, provided a range of views.

The survey responses are set out in a schedule and have been analysed and reported to members¹⁹. A number of areas for future work, including possible planning guidance, were raised.

Issues highlighted during both the stakeholder workshop and in response to the online survey are set out in the individual topic papers and summarised by topic below.

Feedback suggested that further work such as planning guidance would be helpful. It is considered that the workshop and online survey did not highlight issues which indicate grounds to suggest changes are needed to planning policies in the Local Plan.

8. Summary & Conclusions

As a National Park, Exmoor has a higher level of environmental protection than other areas of the country which are not designated as Protected Landscapes. The policies in the Local Plan reflect this, and take as their starting point the statutory purposes of National Parks, which seek to conserve

¹⁸ Exmoor National Park Local Plan 5-Year Review Stakeholder Workshop Summary December 2021 [Exmoor - Exmoor National Park Local Plan 5-Year Review \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk)

¹⁹ Exmoor National Park Local Plan 5-Year Review Survey Responses Schedule [Exmoor - Exmoor National Park Local Plan 5-Year Review \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk)

and enhance these special environments, as well as promoting understanding and enjoyment of them. In fulfilling these purposes, the National Park Authority has a duty to promote the economic and social well-being of local communities.

The Local Plan and its policies do not have the powers alone to deal with all issues, and there are limits to planning powers and what the planning system can deliver.

This five-year policy check of the Local Plan has identified several changes to national policy since the Local Plan was adopted in 2017. These changes are considered to have been relatively minor over the plan period so far, primarily a change in emphasis rather than a complete change in approach. Officers have reviewed the policies in the local plan against the current National Planning Policy Framework (July 2021). Following from this review it is considered that the approach in the ENP Local Plan is appropriate to the local context and National Park designation and **for the majority of the subjects covered under the broad topics of Environment, Housing & Community, and Economy, there is very good policy coverage in the Local Plan, and the current policies are in conformity with the NPPF**. Where there are differences, the wording in the NPPF could be used as an additional material consideration when making decisions on planning applications and giving advice. Further work, separate from the 5-Year Local Plan Review process, is also being investigated to address some of the changes in the NPPF, for example the preparation of Supplementary Planning Documents (SPD).

A number of topics were analysed under each Topic which were the subject of discussions with stakeholders. These are summarised below. Full details and background information are given in each of the accompanying Topic Papers²⁰.

Environment

Biodiversity Net Gain

There are several policies in the Local Plan relating to landscape and the natural environment (contained in chapter 4 Conserving and Enhancing Exmoor, in the Local Plan pages 37 to 86). These policies tend to refer to enhancement rather than biodiversity net gain, however it is not considered that this is in conflict with national policy, but is a different way expressing it. The revised NPPF wording and the newly passed Environment Act will add greater weight and power to the implementation of these policies. There will also be new practices and procedures for dealing with biodiversity net gain which have not yet been worked out as a consequence of the new Act.

In other local authority areas the new biodiversity metric developed by Natural England is being used as a method to assess biodiversity net gain and used in conditions on planning consents. Further work could be done within the current Local Plan policies such as a new Supplementary Planning Document or other guidance to help clarify what is required and to meet the requirements of the Environment Act.

²⁰ Environment, Housing and Community, and Economy Topic Papers [Exmoor - Exmoor National Park Local Plan 5-Year Review \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk)

There are issues with Sites of Special Scientific Interest (SSSIs) within the National Park and their condition, as set out in the information from the Authority Monitoring Report, with approximately 81% in an unfavourable and recovering condition. The reasons for the unfavourable recovering status relate to land management and mostly do not come under the remit of the planning system. Consequently the planning system can only act as part of a wider solution to the issues and problems that exist.

Stakeholder responses

- Policy change not needed to implement biodiversity net gain (BNG)
- Preparation of Exmoor specific approach / guidance / Supplementary Planning Document (SPD) - provide clarity to applicants
- More proactive approach to engaging with Exmoor residents and guidance/advice needed to contribute to BNG & /or low carbon energy solutions
- Limitations of the standard biodiversity net gain calculator– useful for National Park to develop its own tool/metric.”
- Opportunities for gain through e.g. agriculture buildings and small-scale measures such as bird and bat boxes
- Positive contribution to historic environment
- National Park should go beyond minimum, set net gain at 20% and longer than 30 year habitat commitment
- Opportunity for off-site BNG to provide a new income stream for farmers - should include those who have already done a lot for biodiversity
- Important to ensure that off-site BNG is credible
- Biodiversity enhancement linked with climate emergency,
- Natural England confirmed that BNG can be implemented without a change to policies, provided support for the development of an Exmoor specific approach with detail on environmental enhancement and the Exmoor strategy for implementing BNG to expand upon and support the policy
- It also suggested there was an opportunity to develop a green infrastructure strategy, that the plan should address best and most valuable agricultural land, soils, irreplaceable habitats and air quality especially impacts on the natural environment.

Beautiful Design

When dealing with design and creating beautiful and safe places there are many policies in the local plan covering this topic, such as GP1 Achieving National Park Purposes and Sustainable Development and CE-S6 Design and Sustainable Construction Principles. There are also policies on heritage, landscape, nature, shop fronts, extensions, biodiversity and green infrastructure, which may be relevant. All these policies are considered to contribute to creating and maintaining beautiful and safe places. The National Park Authority plans to develop a Design SPD next year.

Stakeholder responses

- Revision of design guide welcomed - it can support existing policies and reflect the Government’s focus on beautiful design
- New guide should include modern design as well as traditional
- Landscaping important to enable more flexibility with design ,

- There is too much concern over preservation rather than adapting and changing
- Design requirements can make housing unaffordable
- Consider plan requirements for materials, particularly for windows
- Build nature into design as part of buildings

Climate Change Mitigation and Adaptation

There is also considered to be a positive strategy for delivering renewable energy within the Local Plan which is appropriate for a National Park and heritage coast, set out in chapter 5 Responding to Climate Change and Managing Resources of the Local Plan, pages 105 to 117. There is a general enabling and encouraging policy CC-S1 Climate Change Mitigation and Adaptation to support measures which may help reduce the impact of climate change, supported by policies dealing with specific issues including flood risk and coastal change. The Local Plan is unusual in that it includes policies for small-scale wind and solar energy development, and identifies areas of search where such development would be considered appropriate or not.

Stakeholder responses

- Whether climate change has sufficient prominence - should it guide all other policies?
- Strengthening of policy from 'encourage' & 'promote' to mandatory requirements
- Climate change concerns regarding the Lynton and Barnstaple Railway
- Linking where people live and work to reduce the need to travel
- Development should demonstrate how it will use low carbon and renewable energy
- Opportunity for more locally generated power, especially hydro
- Support for community renewable energy (even if large scale)
- Need for enabling infrastructure for renewable energy
- More flexibility on renewables and listed buildings / Conservation Areas
- The need to retrofit existing housing stock
- Greater emphasis on retaining historic/traditional buildings because of their embodied energy
- Important to link nature and climate crises, allowing space for nature
- A Natural England response encourages the development of a separate approach to the climate change aspects of the plan in order to add further detail to existing policy hooks – linking to local nature recovery strategies and contributions to woodland creation and peat restoration through net gain.

Historic Environment

The NPPF statements in relation to Heritage Assets and plan-making has changed very little from the 2012 version to the 2021 version, and since the Local Plan was adopted under the 2012 version it is considered there is no need to change the approach set out in the Local Plan. The objectives and the policies of the Local Plan are considered to provide a positive strategy to conserve the historic environment and promote enjoyment of it.

Correspondence received from Historic England related to how the historic environment should be considered as part of a Local Plan review, including highlighting the inter-relationships between housing, community, economy and heritage assets, as well as between the natural and historic environments. It was noted that any particular issues relating to the conservation and management of heritage assets located on or near to the boundary of Exmoor National Park

should also be discussed with neighbouring authorities, although Historic England was not aware of any such issues at that time.

A more recent response has been received from Historic England following attendance at the stakeholder workshop. The response noted:

- Historic England advice fed through into the interim topic papers, especially the environment and summary reports.
- the broad findings in relation to the NPPF and the historic environment,
- the progress on conservation areas and appraisals and heritage at risk; and
- intentions to consider the implications of the update to the Exmoor Historic Environment Research Framework and to progress a Design Guide SPD.

The response concluded that Historic England is comfortable with the proposed direction of travel for the Local Plan Review.

Minerals

There are considered to be few changes in legislation or national guidance affecting the minerals related policies in the Local Plan. There may however be increased interest in using local stone for construction in the National Park in the future to meet the 'build beautiful' agenda, and this is considered to be covered by existing policy CE-S7 Small Scale Working or Re-Working for Building and Roofing Stone.

Somerset County Council mineral's team has noted existing close working between the County and Exmoor National Park Authority (ENPA) on the Local Aggregate Assessment prepared by Somerset County Council in partnership with the ENPA. The response recognises that, in the National Park, major quarry working is very unlikely. Small building stone working may take place, although at the current time, there are no working quarries. The County will continue to engage with the ENPA on this and any other relevant mineral and waste work. No other specific mineral or waste issues were identified but if any were to arise, they could be dealt with through future joint working. E.g. through the review of the mineral and waste plans through the change to a Unitary Council.

Analysis of consultation responses on the environment

There were a number of responses relating to enhancing biodiversity and biodiversity net gain including from Natural England who confirmed that biodiversity net gain could be implemented within the existing policy framework.

Comments on design were generally supportive of further work outside of the Local Plan but linked to it, such as planning guidance on design (including modern design). Policy CE-S6, seeks to ensure that design is high quality, sustainable and that it complements Exmoor's local character. This can include modern designs. The need to consider affordability was also raised as were biodiversity and climate change considerations as part of design. Policy GP1 and CE-S6 both include provisions on biodiversity and climate change (along with biodiversity policies (CE-S3, CE-D2), climate change policies (CC-S1, CC-S5, CC-D3 and CC-D4) and CE-D3 on heritage assets – this policy enables measures for climate change adaptation and mitigation.

A number of comments were received relating to strengthening the policy approach to climate change. While it is acknowledged that there could be scope to strengthen policies, it is considered that they provide a positive strategy for action to adapt to and mitigate the effects of climate change. This includes Policy GP1 (Achieving National Park Purposes and Sustainable Development) which requires that opportunities must be taken for the needs of future generations, in terms of resilience, adaption & mitigation of climate change impacts and in relation to sustainable building, materials and minimising energy/waste.

Policy CC-S1 Climate Change Mitigation and Adaptation supports measures which may help reduce the impact of climate change, and the plan enables renewable energy proposals to come forward. Additional policies include those dealing with flood risk and coastal change.

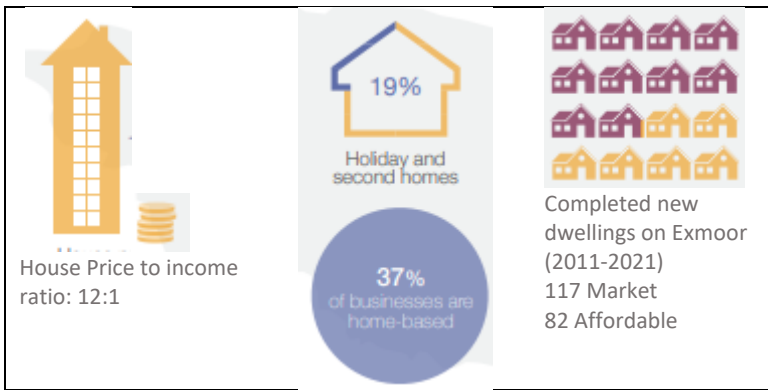
The National Park Authority declared a climate emergency in 2019, along with the UK government, and since then the impact of planning proposals on the climate are specifically set out in all reports to the Planning Committee, in addition to impacts on the natural and historic features for which the National Park is designated.

A number of responses raised concerns related to the Lynton and Barnstaple Railway. In the case of the Railway planning permissions, detailed environmental assessments were taken into consideration and concluded that, although a minor increase in greenhouse gas emissions is unavoidable with any heritage steam railway, steps can and should be taken to mitigate emissions including the use of local and recyclable materials and the planting of trees and hedges. The report also noted that the newer locomotives being used are more efficient and powerful than some historic engines. Additionally, a condition of the planning permission is the requirement for a carbon plan. The railway is part of the history and cultural heritage of the National Park, and its reinstatement is seen as consistent with promoting opportunities for the understanding and enjoyment of those special qualities.

Housing & Community

Section 6 of the adopted Local Plan 'Achieving a Thriving Community' (pages 134-199) contains policies for housing and community services and facilities. The Local Plan provides a bespoke approach to planning for housing and community services and facilities on Exmoor to reflect local circumstances. A core objective of the Local Plan is to deliver affordable housing to meet the needs of local people.

Evidence is showing an increase in house prices and the affordability gap between house prices and wages, a significant proportion of market housing still used as second/holiday homes and a continued local need for affordable housing indicating that locally needed affordable housing remains a priority for the area.



From Rural Enterprise Exmoor Vision
Updated completions and house price income ratio

Updated evidence suggests that projected levels of local affordable housing need have fallen (a reduction of 19% from 238 to 194 dwellings for the period 2011-31). Similarly, updated housing need evidence for Somerset West and Taunton District Council 2020-2040 covering the Somerset part of the National Park also shows a reduction in need beyond the end period of the Exmoor National Park Local Plan. This reflects Exmoor’s ageing population and is likely to be due to reductions in older households beyond 2030 who, on Exmoor, currently make up a higher than average proportion of households.

In practice, parish housing need surveys provide the local affordable housing need evidence to inform planning decisions. Updated surveys cover a high proportion of Exmoor’s population, and show that there are currently 53 households in local affordable housing need within ENP (compared with previous estimates of 90 homes required). This is only a snapshot in time and may not fully reflect the true need for affordable housing as not everyone who is in need will come forward. However, it provides evidence of affordable housing need across all parishes surveyed, an indication of how the housing needs of local communities are fluctuating, and where efforts to support affordable housing delivery need to be focused.

Local Plan policies provide a positive framework to maximise opportunities for local need affordable housing to come forward, providing certainty for affordable housing providers and households in local housing need including self/custom builders. Evidence from appeals decisions is not indicating a cause for concern. In terms of the existing housing stock, monitoring for all tenures of housing shows that most permissions for extensions are granted.

Analysis of updated evidence and monitoring does not indicate that a review of the Local Plan housing policies should be triggered. However, a number of topics have been investigated further which were the subject of discussions with stakeholders. These are summarised below.

Affordable housing delivery

Whilst the changes in national policy and analysis of the evidence do not indicate a need to review the Local Plan policies, there are concerns over the level and speed of delivery of sufficient affordable homes for local people. Higher house prices and an increased affordability gap between house prices and wages within the National Park are also exacerbating this situation. Further work is required to better understand the reasons behind this, although not all of the likely factors will

be within the scope of planning, for example the availability of finance, either via grant or loans. The adopted Local Plan provides more flexibility than the previous Local Plan to deliver affordable housing through providing for cross subsidy “Principal Residence” housing but, on average, there were higher levels of delivery during the previous Local Plan.

One of the questions for further discussion is whether changes to policy will lead to improved delivery, or if efforts should continue to be focused on supporting delivery for example through Rural Housing Enabling and the Exmoor Rural Housing Network. Additional guidance could also assist delivery, for example for affordable housing

More housing for local people

The evidence review included the Rural Enterprise Exmoor Vision produced in partnership with local authorities and businesses, and adopted by the Authority. One of the issues highlighted in the Vision is the need for more housing for local people, not just affordable housing. The Local Plan has policies enabling a variety of housing for local people: As well as all new affordable housing having local need occupancy ties which can include occupancy by people moving to Exmoor to take up work in the National Park, the Plan also enables housing for rural workers, succession farm, extended family and accessible and adaptable housing. The review process will need to consider the evidence and conclude whether any changes are needed to Local Plan policies for housing. Part of ongoing policy work is to consider potential impacts of changes. For example, the evidence gathered for the current Local Plan identified that suitable sites for new housing are very limited due to physical constraints such as flooding and landscape sensitivity, and flagged up the need to ensure suitable potential sites remain for future affordable housing for local people in the longer term.

Stakeholder responses - housing

- Affordable housing (for people who cannot afford market housing) is the priority / even more important so they can live near family/ work
- Need for more affordable housing and more plots for affordable housing including on the outskirts of villages
- Affordable housing viability. Cross-subsidy as an option to deliver more affordable housing
- For cross subsidy, minimum number of market Principal Residence is too vague
- Allow for Principal Residence housing to deliver affordable housing in a different parish
- Delivery of affordable housing – need to establish whether it is a policy issue
- Limit new housing to three largest settlements
- No unrestricted market homes - become second and holiday homes
- Definition of ‘affordable’ thought to help some people – on lowest incomes- but not others
- Affordable housing should “remain so in perpetuity”
- Access to housing for local workers – some travelling in currently
- Need for workspace/buildings for working from home
- Lack of staff accommodation
- Local housing - employees of local businesses / local workers with a local but not local affordable need tie e.g. as in Yorkshire Dales
- Local wages lower than average in Interim Topic Paper (£18k rather than £28k p.a.)
- Advantages in allowing for local (non-affordable) housing – though may reduce number of affordable homes

- More housing for local people could have unintended consequences: undermining key priority of local affordable housing, particularly for the young, and extra pressure on biodiversity, suitable sites, landscape, and special qualities of remoteness, rurality, wildness and tranquility
- Local connection criteria too stringent. Should include workers (in addition to agricultural and forestry or jobs benefiting the National Park) e.g. contributing to local economy
- Changes to farming and future needs of farming including new housing
- Housing for elderly and people with disabilities
- Look at interpretation/application of the current policies to be more responsive to e.g. need for self-build
- Local connection criteria and bordering parishes - Brushford
- Maximum floor space of 93m² too small e.g. for self-builds. Why does it apply to conversions? Different size limits on owner occupied compared to Registered Provider controlled housing. Need for outbuildings/space for working from home. Larger housing to move to
- Policies are good and progress is being made – patience is needed as development is a long process. There is now a strong pipeline of affordable housing
- Policies not out of date re NPPF, affordable housing delivery strategy not effective enough at enabling delivery of sufficient affordable housing
- Affordable self-builds permitted through the Local Plan - policy is working. Other factors may be affecting delivery
- Strengthen support for community land trusts.

Non-policy related housing issues:

- Concern and wish to prevent or limit second / holiday homes and shortage of rented housing compared to holiday lets. Changes to council tax for second homes
- The loss of the Rural Housing Enabler – now reinstated (in Somerset part of ENP) things seems to be happening - hoped will lead to development
- Loss of affordable housing grants for Registered Providers (RPs) - recently reinstated
- difficulties with Homefinder - does not reflect all local housing need
- Registered Providers (RPs) and scale of sites
- High cost of living on Exmoor
- Potential to look at managed (custom) build options
- Impacts of design requirements and ongoing maintenance costs / need for grants to offset higher costs
- Allow for modern designs of housing
- Greater emphasis on carbon reduction; energy use of materials and building methods
- Opportunities for landowners to release land for affordable housing as lower agricultural values on Exmoor
- Helpful to include plot values

Safeguarding community facilities

Monitoring suggests there has been some loss of community facilities, some of which are outside of the control of the planning authority. In addition, proposals for changes and extensions to existing facilities are coming forward. In some cases, this has been to create ancillary additional facilities to support the existing business, in line with policies in the Local Plan, in others new facilities have been permitted or the replacement of existing facilities with another type of facility.

The retention of facilities and services is an important part of maintaining thriving communities. Whilst not all losses can be controlled by planning, one of the questions for the review is to consider whether evidence shows that any changes to the policies are needed in relation to community facilities in future.

Stakeholder responses - community

- Ageing and declining population and the impact on local community services and economy
- Loss of services due to demographics (elderly population) and spending priorities not changes to permitted development
- Example of Community Land Trust shop underway at Parracombe
- Other community shops set up, e.g., Exford, Winsford
- Concern over a local pub changing the way it opens and operates
- Need sensitivity to changes to local circumstances and commercial and community opportunities. New diversified uses preferable to derelict buildings. 'Change of use' should consider and encourage opportunities / benefits to the local community such as community facilities.

Analysis of consultation responses on housing and community

A range of issues relating to housing and particularly housing for local communities was raised. The concerns of the National Park Authority about the level of delivery of affordable housing in recent years was echoed in responses which indicated strong support for local need affordable housing and including for local workers and concern over the increased costs of housing. There were comments on delivery. It was also noted that policies are good, progress is being made, that development is a long process but there is now a strong pipeline of affordable housing. Community Land Trusts were mentioned.

Some concerns were raised around provision for local workers e.g. people needing to commute into the National Park and staff accommodation. Policy HC-S3 which defines local connection for affordable (including self/custom build) housing includes a clause for local workers in affordable housing need where work benefits the community / National Park. It can include a range of work including health, social care, community services, retail and tourism for example. Local non-affordable housing was raised and it was also noted that this could have unintended consequences in undermining the priority of local affordable housing, particularly for the young, and other impacts on Exmoor. The Plan contains a policy to enable staff accommodation (Policy RT-D2). Other issues, which also link to Exmoor's economy, related to the need for space for people, particularly younger people and families to work from home including through enabling additional buildings. Adopted Local Plan policies set internal floorspace standards of 93sqm which the Government defines as a 3- bedroom home. Additionally, Local Plan policies enable flexibility through enabling residential extensions (Policy HC-D15), outbuildings (HC-D16) and through a policy for home-based businesses (SE-D1).

A number of non- planning policy issues were raised and these are summarised above. This included widespread concern about second and holiday homes.

A number of comments were made about communities including the impact of population decline and an ageing population on local community services and the economy. Community efforts to manage community run facilities such as local shops were noted and the need to consider and

encourage opportunities / benefits to the local community such as community facilities. Policy HC-D19 seeks to safeguard existing services and facilities from loss through change of use. The policy provides flexibility where requirements are met and changes should then be to community uses, employment or local need affordable housing.

Economy

Business Development

A number of policies in the Local Plan relate to business development (contained in section 7 Achieving a Sustainable Economy of the Local Plan pages 202-218). Policies provide a criteria-based approach for business development in/adjoining the named settlements and through the reuse of buildings, extensions and appropriate redevelopment in the open countryside. Policy SE-D2 safeguards the finite supply of existing employment land and buildings Policies are included for home-based businesses reflecting Rural Enterprise Work which has shown the very high number of self-employed, home-based, and micro businesses on Exmoor. The AMR monitoring indicates that the policies are enabling some new business as well as the loss of some. 10 live work/homeworking applications have been permitted since the Local Plan was adopted.

Section 7 of the Local Plan also contains policy SE-S4 for agricultural and forestry development. Monitoring through the AMR indicates that the policies are enabling agricultural and forestry development (75 agricultural and forestry buildings have been permitted since 2017 and 1,680m of agricultural and forestry tracks).

The Rural Enterprise Exmoor (REE) vision document provides helpful information and evidence to better understand the local economy as well as a series of findings. The vision does not seek to provide a detailed delivery plan, rather it is intended to provide partners with guidance on key areas of focus for future activity, as well as to feed into the work of others. The work highlights the very high proportion of micro-businesses self-employment and home working in the National Park. The background research for Rural Enterprise Exmoor vision identified that there were nearly 1,300 businesses operating in the National Park - 60% more than were picked up from nationally available databases mainly because they were small or micro businesses. As a result, there may be a need to consider whether monitoring of the local economy can be improved.

Stakeholder responses

Farming, the land-based economy and farm diversification

- Changes to farming / current uncertainty
- Changes may impact on viability and farms may need to be bigger to survive
- A challenging time for land based businesses policies and support for diversification opportunities will allow businesses to plan for further change and upheaval.
- Changes to farming may lead to the farming operation being subsidiary to other income e.g. diversification - diversification into tourism was not thought to suit everyone .
- Agricultural ties for housing may prevent diversification
- Intensive farming / large buildings for livestock farming are not supported by policy. An alternative view was that there may be a lack of familiarity with the policies.
- Enable variation / extension of existing businesses needed locally (e.g. engineering fabrication on farms)

- Farming activities are supported by other micro business which need to be in the National Park.
- The current policies are too restrictive.
- Policies generally balance diversification and the environment appropriately.

Working from Home/Home-based Businesses

- Opportunities, especially Post Covid, for those who work from home to move to Exmoor - could include micro-businesses which may also provide employment.
- Way to retain younger people / encourage working people to be based on Exmoor. Need for space / small buildings/ garden offices to enable people to work from home.
- Linked to digital communication.
- Work from home linked to climate change as it contributes to carbon reductions from reducing the need to travel. High speed digital infrastructure is therefore essential.

Recreation and Tourism

Recreation and tourism policies are in Section 8 'Achieving Enjoyment for All' (on pages 220-250 of the Plan). REE and Exmoor National Park work provide a pre-Covid baseline, evidence on the impacts of Covid restrictions on business and Covid recovery. 60% of employment in the National Park is in tourism while accommodation and food and drink services are the largest business sector - 38% of total businesses and 44% of all employment. The work highlights the challenges faced by the tourism sector as a result of Covid restrictions. Analysis of the AMR indicates that Plan policies are enabling tourism related development to come forward – 14 applications have been permitted since 2017. Six serviced accommodation businesses (hotels and guest houses) have been lost although one application was permitted in 2020/21. By contrast 17 non serviced accommodation applications (holiday lets) have been permitted since the Plan was adopted. Relatively low numbers of new camping accommodation including camping barns and alternative camping accommodation such as shepherd's huts have been determined since the Local Plan was adopted. The figures do not include "pop up campsites" which can operate for a limited number of days per year within permitted development rights. The number of days has been increased from 28 to 56 days during the Covid -19 pandemic.

Analysis of the AMR shows that Plan policies are enabling recreational development. In particular, 18 equestrian developments have been approved since the Plan was adopted.

Stakeholder responses - tourism, economic diversification and business

- Current Policies may be too restrictive and need change
- Need to understand impact of increased tourism and appropriate balance and whether the impacts outweigh benefits.
- A need to diversify to other industries. Examples of alternatives to diversification into tourism could include emerging carbon bank / natural capital markets
- High proportion of micro-businesses on Exmoor
- Diversify economy for higher skilled, better paid jobs – more/larger business premises and sites - micro businesses may not provide high-paid skilled jobs
- Policies should prevent ad hoc economic development intrusive to local communities and / or landscapes

Electronic communications

Electronic communications (and transport) policies are in section 9 'Achieving Accessibility for All' on pages 252 to 273 of the Local Plan. Plan policies are considered to be in line with national policy and the NPPF is taken account of as a material consideration in decision making. Introducing high quality fast digital communications to the whole of the National Park has been challenging for a variety of reasons including a dispersed population, deep rurality and difficult terrain although Exmoor is not alone in having experienced delay in the rollout of communications infrastructure. It is not considered that this is due to Local Plan policies.

AMR monitoring shows that 16 telecommunication masts have been approved since adoption of the Local Plan. The Government has extended permitted development rights for electronic communications infrastructure in National Parks. Under existing regulations, an existing ground-based mast can be extended up to 20 metres above ground level through permitted development rights, or up to the height of the existing mast (if taller), without the need for prior approval which means that development is not managed through the Local Plan. The Government has consulted on extending the height of masts in National Parks permitted in this way to 25 metres.

Innovative solutions and an approach suited to local circumstances continues to be needed to improve coverage. The Local Plan seeks to enable the roll out of infrastructure in a way that protects Exmoor's landscape. An appeal decision for an emergency telecommunications mast has been a concern.

Coverage and speed of connections remains an issue for businesses. The Rural Enterprise work and vision has highlighted digital connectivity as a key objective.

Stakeholder responses – digital communications

- There are known problems: poor signal and internet, patchy coverage; need for a strategy to roll out improvements
- Vital for successful businesses
- Masts still needed now but technology may change e.g. cable or fibre, 2025 loss of copper phone service
- Impacts of masts (and ground based infrastructure) on the National Park

A Natural England response indicated support for policies which highlight landscape character as a determining factor in the siting of communications infrastructure and which advised that the landscape impacts of any further infrastructure proposals should be carefully considered before permission is granted.

Analysis of consultation responses on the economy

A range of responses was received on different aspects of Exmoor's economy. This included recognition of changes in farming, the current uncertainty and challenges facing land-based businesses and the need to allow for diversification. Policy SE-S4 enables new agricultural and forestry development and it is considered, together with policies on rural worker housing to

provide flexibility to respond to changing needs in a way that is appropriate for Exmoor National Park. Policy SE-S3 allows for new business development in the countryside – this includes farm diversification with additional flexibility for farm businesses. New emerging markets such as for

carbon banks/natural capital, were mentioned as future types of diversification and the need to diversify the economy beyond tourism was also highlighted. The employment policies in the plan provide a flexible approach for new business development in settlements and in the open countryside (SE-S1 and SE-S3) SE-D2 safeguards existing sites and premises to ensure there is a supply of existing sites and to enable the market to respond to changing circumstances including micro-businesses.

Working from home was highlighted (as it was in responses on housing) and this was also mentioned in the context of climate change through reducing commuting and the need for digital connectivity. Policy SE-D1 provides for home-based businesses.

Responses emphasised that digital connectivity was now vital and needed to be improved. Policy AC-S4 and Policy AC-D5 apply to communications networks and telecommunications infrastructure. Natural England highlighted the need for care in considering landscape impacts for infrastructure proposals.

Overall Conclusion on consultation responses and plan policies

A wide range of responses was received to the consultations. Some comments related to issues which can already be addressed through existing Local Plan policies while others related to matters which are not controlled through the planning system / policy. Overall, after careful consideration, officers do not consider that a change to planning policies is needed.

Many comments and responses related to delivery and implementation and it is recognised that additional work is needed including to update information for applicants and to raise awareness e.g. through an updated local verification check list and planning guidance.

9. Lynton and Lynmouth Neighbourhood Plan (The Lyn Plan)

Planning law requires that decisions need to be taken in accordance with the 'development plan' unless material considerations indicate otherwise²¹. The 'development plan' for an area can include 'made' neighbourhood plans.

The Planning Advisory Service (PAS) Toolkit advises that, in undertaking the review, policies in all of the development plan documents that make up the development plan, including any 'made' neighbourhood plans should be taken into consideration.

There is one 'made' neighbourhood plan within Exmoor National Park. The Lynton and Lynmouth Neighbourhood Plan 2013-28 or the 'Lyn Plan'.²² It applies to Lynton & Lynmouth neighbourhood area (Lynton and Lynmouth parish containing the settlements of Lynton, Lynmouth and Barbrook). Exmoor National Park Authority agreed to 'make' The Lyn Plan in 2013 before the adoption of the Exmoor National Park Local Plan in July 2017. This brought the Lyn Plan into force as part of the development plan for Lynton & Lynmouth parish. The Lyn Plan policies were considered as part of the 2016-17 examination of the Exmoor National Park Local Plan. The Inspector's report for Local Plan said the following:

²¹ Section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004.

²² [Lynton & Lynmouth Neighbourhood Plan \(exmoor-nationalpark.gov.uk\)](http://exmoor-nationalpark.gov.uk)

The Lynton and Lynmouth Neighbourhood Plan came into force in 2013. Section 38(5) of the Planning and Compulsory Purchase Act 2004 requires any conflict between policies in the development plan to be resolved in favour of the policy in the last document to be adopted. This means that any conflict between the policies of the Local Plan, once it is adopted, and those of the Lynton and Lynmouth Neighbourhood Plan (“Lyn Plan”) would need to be resolved in favour of the Local Plan policies.

In effect, a number of Lyn Plan policies were superseded by the adoption of the more up to date Local Plan. An analysis of the Lyn Plan policies against the Exmoor National Park Local Plan policies was undertaken as part of the Examination to assess the degree of conflict²³. Lyn Plan policies were analysed as follows²⁴.

- Policies that were in conflict with the Local Plan would be “resolved in favour of” the Local Plan policies. Some policies (e.g. on hotels and changes of use) had in any case, been discussed with the Town Council who preferred the more flexible Local Plan policy approach.
- Some were broadly similar to Local Plan policies (business development, community services and facilities, affordable housing cascades and Principal Residence dwellings).
- Lastly, some contained elements that were distinct from the Local Plan and which were not considered to conflict with it (Policies E8 Storage (safeguarding storage space) and E10 - Parking (safeguarding parking capacity)).

Analysis

The adoption of the ENP Local Plan in July 2017 meant that decisions on planning applications in the Lynton & Lynmouth neighbourhood area (parish) had to be taken in accordance with the most up to date plan i.e. the Local Plan. Policies in the Local Plan therefore have precedence in decision-making. The Inspector’s report for the Local Plan examination said:

It is... important to note that many of the policies of the Lyn Plan are unlikely to conflict with policies in the Local Plan. Those policies will be unaffected by the provisions of section 38(5). Moreover, it may well be that even the policies that are so affected could nonetheless potentially be capable of being a material consideration to weigh against determining future planning applications in strict accordance with the Local Plan policies. However, this is a matter to be considered by future decision-makers.

There is no requirement to review or update a neighbourhood plan and a review would not be undertaken by the National Park Authority. Legislation enables three types of organisation to lead on neighbourhood planning: a parish or town council; a neighbourhood forum; or a community organisation²⁵.

Officer conclusions

Lyn Plan policies are considered, when determining planning proposals in Lynton and Lynmouth parish, either as part of the development plan or, more usually, as a material consideration and

²³ [Consultation Statement \(exmoor-nationalpark.gov.uk\)](http://exmoor-nationalpark.gov.uk)

²⁴ [EX30-ENPA-Response-to-Inspectors-Letter-re-policy-ES-S2-final.pdf \(exmoor-nationalpark.gov.uk\)](http://exmoor-nationalpark.gov.uk)

²⁵ [Neighbourhood planning - GOV.UK \(www.gov.uk\)](http://www.gov.uk) Paragraph: 014 Reference ID: 41-014-20140306

accorded appropriate weight. As part of the 5-Year Review of the ENP Local Plan, policies in the Lyn Plan have been taken into consideration.

10. Officer Conclusions

The Local Plan was adopted in 2017 and 5 years on, **there does not appear to be grounds to suggest changes are needed to planning policies in the Local Plan based on the review of national policy, updated evidence, Duty to Co-operate discussions, stakeholder engagement and monitoring.**

11. Next Steps

The outcomes of the review have been summarised in an Authority report together with recommendations to be presented at an Authority meeting on 14th June 2022. The officer recommendation is that a Local Plan Review is not required.

The decision on whether Adopted Exmoor National Park Local Plan 2011-31 policies need to be reviewed will be made and published with reasons by the Authority before 5th July 2022 in accordance with the legislation.

If a decision were taken to review the Plan, further work would be needed to scope the review and to prepare a project plan and updated Local Development Scheme. A Local Plan review would be required to follow the plan-making procedure, including preparation, publication, and examination by the Planning Inspectorate on behalf of the Secretary of State²⁶.

²⁶ NPPG Paragraph: 069 Reference ID: 61-069-20190723 Revision date: 23 07 2019

Evidence documents for the Exmoor National Park Local Plan 5 Year Review

The following is a list of the evidence taken account of in the Exmoor National Park Local Plan 5-Year Review and available on the 5 Year Review webpage.

[Exmoor - Exmoor National Park Local Plan 5-Year Review \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk)

- Exmoor National Park Local Plan 5 Year Review National Policy Checklist
- Appeal Decisions in Exmoor National Park July 2017 - March 2022
- Exmoor National Park Planning and Enforcement Allowed Appeals 2017-2022
- Exmoor National Park Local Plan 5 Year Review Topic Papers:
 - Summary Report May 2022
 - Environment Topic Paper May 2022
 - Housing and Community Topic Paper May 2022
 - Economy Topic Paper May 2022

- Exmoor National Park Authority Monitoring Report 2019-21 Interim Summary
- Exmoor National Park Local Plan 5 Year Review Stakeholder Workshop Summary December 2021
- Exmoor National Park Local Plan 5 Year Review Survey Responses Schedule
- Statements of Common Ground Exmoor National Park Local Plan 5 Year Review May 2022
- Exmoor National Park Local Plan 5 Year Review PAS Local Plan Review Assessment May 2022
- Additionally, a range of evidence is referred to in the Topic Papers some with links within the documents as appropriate. This includes the following which can also be accessed directly from the webpage.
 - Exmoor National Park Within Somerset West & Taunton: Local Housing Needs Assessment 2021
 - South Somerset and Somerset West & Taunton Councils: Local Housing Needs Assessment 2020 Report of Findings August 2021
 - Rural Enterprise Exmoor Evidence and Vision

EXMOOR NATIONAL PARK AUTHORITY

14 June 2022

ANNUAL APPOINTMENTS

Report of the Head of Strategy and Performance

Purpose of the report: In accordance with Standing Orders to set out the annual appointments to be made to the Authority's Committees, partnership boards and working groups as are necessary to carry out the work of the Authority, and to set out the annual appointments to be made to other organisations.

RECOMMENDATION: To make appointments to all operational Committees, partnership boards, working groups and outside bodies as listed in the Appendix to this report, or as agreed by the Authority Committee.

Authority priorities: The Authority's annual appointments are central to the achievement of each of the Partnership Plan and Corporate Plan priorities.

Legal and equality implications: Local Government Acts 1972, 2000 etc – the meetings and proceedings of a National Park Authority are regulated by local government law as if the National Park Authority was a local authority. The equality impact of the recommendations of this report have been assessed as having no adverse impact on any particular group or individual.

Financial and risk implications: There are no significant financial or risk implications of the recommendation of this report.

Climate change implications: It has been assessed that this report does not have an adverse impact on our ability to respond to climate change. Many of the groups listed will be instrumental in supporting our climate response. A lead Member for Climate Change will be identified.

1. Introduction

1.1 At its Annual Meeting, the Authority makes appointments to its Committees, panels or working groups as are necessary to carry out the work of the Authority.

2. Appointments to Committees, Partnership Boards, Working Groups and Outside Bodies

2.1 The attached Appendix is a schedule of the Authority's Committees, partnership boards and working groups, together with a schedule of appointments to outside bodies. The Appendix includes current appointments and expressions of interest in appointment/reappointment for 2022-23. The Authority is recommended to consider and agree appointments in accordance with the schedule.

Clare Reid
Head of Strategy and Performance
May 2022

Statutory Meetings	Current Appointments	Expressions of Interest 2022/23
<p>Final Accounts Committee The Committee comprises at least 5 Members of the Authority (with a maximum of 11), of whom at least one shall be a local authority Member and at least one shall be a Member appointed to the Authority by the Secretary of State. The Members shall be the Chairperson of the Authority (who shall preside at meetings) and the Deputy Chairperson of the Authority and at least 3 Members chosen by the Authority.</p> <p>The Committee will meet annually to receive and approve the annual Statement of Accounts in accordance with statutory deadlines. Committee Members will meet at regular intervals as the Finance & Performance Advisory Panel with the Chief Executive, Head of Finance & Operations and Head of Strategy & Performance to maintain a detailed overview of the financial position, overall performance and management of risk within the Authority; the membership of the Panel to comprise (but not be limited to) the Members of the Final Accounts Committee.</p>	<p>Mr R Milton (Parish) Miss A V Davis (DCC) Mr M Ellicott (Parish) Mrs F Nicholson (SCC) Mr J Patrinos (NDC) Mr S J Pugsley (SWT) Miss E Stacey (SoS) Mr N Thwaites (SWT) Mr V White (Parish)</p>	<p>Chairperson of the Authority Deputy Chairperson of the Authority</p> <p>Mr M Ellicott (Parish) Mrs F Nicholson (SCC) Mr J Patrinos (NDC) Mr S J Pugsley (SWT) Miss E Stacey (SoS) Mr V White (Parish)</p>
<p>Standards Committee Comprises 5 Authority Members of whom at least one shall be a local authority Member and at least one shall be a Member appointed to the Authority by the Secretary of State. The general functions of the Committee are to promote and maintain high standards of conduct by members and officers; to assist members to observe the Code of Conduct; and to consider and determine complaints against members under the Code of Conduct and keep an overview of other complaints received by the Authority. Meets as required, at least twice a year including after the Authority AGM to appoint a Chairperson and Deputy Chairperson.</p>	<p><u>Chairperson</u> Mr J Patrinos (NDC)</p> <p><u>Deputy Chairperson</u> Miss E Stacey (SoS)</p> <p>Mr M Ellicott (Parish) Mr S J Pugsley (SWT) Mr N Thwaites (SWT)</p>	<p>Mr M Ellicott (Parish) Mr A Milne (SWT) Mr J Patrinos (NDC) Mr S J Pugsley (SWT) Miss E Stacey (SoS) Mr N Thwaites (SWT)</p>
<p>Exmoor Local Access Forum (Lead Officer: Dan Barnett, Access & Recreation Manager) The Forum is a <i>Partnership Plan Group</i> with a key role to lead in the development and delivery of relevant action plans set out in the Exmoor National Park Partnership Plan and is a statutory independent advisory body which includes 2 Authority Members. The Forum advises on the improvement of public access to land for the purposes of open-air recreation and enjoyment and meets twice a year.</p>	<p>Mr R Milton (Parish) Dr S Warren (SoS)</p>	<p>Dr M Kelly (SoS) Mr A Milne (SWT) Dr S Warren (SoS) Mrs P Webber (Parish)</p>
External Consultation Group	Current Appointments	
<p>Exmoor Consultative and Parish Forum Acts as a forum for consultation and discussion of matters of principle affecting the National Park and promotes better understanding between the National Park Authority and other bodies having an interest in the National Park. Meets 4 times a year provided there are relevant issues to discuss. <u>The Authority to appoint the Chairperson and Deputy Chairperson(s) of the Forum.</u></p>	<p>* All Authority Members invited to attend meetings</p> <p><u>Chairperson</u> Mr M Ellicott (Parish)</p> <p><u>Deputy Chairperson</u> Mr V White (Parish)</p>	<p>Mr M Ellicott (Parish) Mr V White (Parish)</p>

Partnership Boards and Working Groups	Current Appointments	Expressions of Interest 2022/23
<p>Exmoor Historic Environment Advisory Group (Lead Officer: Shirley Blaylock (Conservation Officer Historic Environment). The Group meets 2 or 3 times a year including a summer field visit. The group is a <i>Partnership Plan Group</i> and reviews current issues, opportunities, work and research relating to the Historic Environment on Exmoor. Progress is monitored against the Exmoor Partnership Plan and the Historic Environment Research Framework. <i>Comprises representatives from partner organisations, public, private and voluntary sections and is seeking 3 Authority Members for the 22/23 year.</i></p>	<p>Mrs L Blanchard (SoS) Mr J Holtom (Parish)</p>	<p>Mrs L Blanchard (SoS) Mr J Holtom (Parish) Dr M Kelly (SoS)</p>
<p>Exmoor Landscape Advisory Group (Lead Officer: Julie Layzell – Future Landscapes Officer). Originally established and chaired by the Exmoor Society to provide independent advice to the Authority on landscape issues, the group also acts as a <i>Partnership Plan Group</i> with a key role to lead in the development and delivery of relevant action plans set out in the Exmoor National Park Partnership Plan. The group is a partnership of landscape specialists, planners and managers from the public, private and voluntary sectors which reviews all landscape matters in the National Park, in particular the relationships between people and place. <i>The group is seeking 3 Members for the 22/23 year. Meets as required, usually twice a year.</i></p>	<p>Mrs L Blanchard (SoS) Mr R Milton (Parish)</p>	<p>Mrs L Blanchard (SoS) Dr M Kelly (SoS) Mr A Milne (SWT) Mr N Thwaites (SWT)</p>
<p>Exmoor Learning and Engagement Network (Lead Officer: Ben Totterdell, Learning & Engagement Manager). The Network brings groups, projects and individuals together who have a role in delivering learning and engagement work in Exmoor. It promotes and enables the sharing of best practice, support for partnership working and influencing of strategic actions among both Exmoor National Park Authority and our Partners. <i>Comprises representatives from partner organisations and is seeking up to 4 Members for the 22/23 year. Meets twice a year.</i></p>	<p>Mrs L Blanchard (SoS) Mr B Revans (SCC) Dr S Warren (SoS)</p>	<p>Mrs L Blanchard (SoS) Mrs F Nicholson (SCC) Dr S Warren (SoS)</p>
<p>Exmoor Moorland & Farming Board (Lead Officers: Alex Farris, Conservation Manager & Heather Harley, Conservation Officer Farming & Land Management). The group is a <i>Partnership Plan Group</i> with a key role to lead in the development and delivery of relevant action plans set out in the Exmoor National Park Partnership Plan. <i>Comprises 4 Members of the Authority plus people nominated by other organisations with a particular interest in Exmoor's moorlands and farmlands. The Board usually meets two or three times a year.</i></p>	<p>Mr D Elson (SoS) Mr J Holtom (Parish) Mr R Milton (Parish) Mr J Yabsley (DCC)</p>	<p>Mr D Elson (SoS) Mr J Holtom (Parish) Mr R Milton (Parish) Mr J Yabsley (DCC)</p>
<p>Exmoor Nature Conservation Advisory Panel (Lead Officer: Ali Hawkins (Senior Conservation Officer (Wildlife)). The group is a <i>Partnership Plan Group</i> with a key role to lead in the development and delivery of a Wildlife Delivery Plan to take forward the wildlife ambition in the Exmoor National Park Partnership Plan and deliver the Nature Recovery Vision for Exmoor. <i>Comprises representatives from partner organisations and is seeking up to 5 Authority Members for the 22/23 year. Meets twice a year.</i></p>	<p>Mrs L Blanchard (SoS) Mr J Holtom (Parish) Mr J Hunt (SCC) Dr S Warren (SoS)</p>	<p>Mrs L Blanchard (SoS) Mr J Holtom (Parish) Dr S Warren (SoS)</p>

Partnership Boards and Working Groups	Current Appointments	Expressions of Interest 2022/23
<p>Exmoor Rural Housing Network (Lead Officers: Dean Kinsella, Head of Planning & Sustainable Development, Clare Reid, Head of Strategy & Performance, & Ruth McArthur, Policy & Community Manager). The Exmoor Rural Housing Network brings together a group of organisations/individuals with interest in affordable housing on Exmoor to improve access to housing on Exmoor for local people and support a locally managed and delivered programme for local needs rural housing. Meets once a year. <i>Comprises representatives from partner organisations and up to 5 Authority Members.</i></p>	<p>Mr M Ellicott (Parish) Mr J Holtom (Parish) Mrs F Nicholson (SCC) Mr S J Pugsley (SWT) Mr V White (Parish)</p>	<p>Mr M Ellicott (Parish) Mr J Holtom (Parish) Mrs F Nicholson (SCC) Mr S J Pugsley (SWT) Mr V White (Parish)</p>
<p>Exmoor Woodland and Forestry Advisory Group (Lead Officer: Graeme McVittie (Senior Conservation Officer (Woodlands) The group is a <i>Partnership Plan Group</i> with a key role to lead in the development and delivery of relevant action plans set out in the Exmoor National Park Partnership Plan (<i>comprises representatives from partner organisations and up to 2 Authority Members</i>). Meets as required.</p>	<p>Mr J Holtom (Parish) Mr J Hunt (SCC)</p>	<p>Mr J Holtom (Parish)</p>
<p>Equality, Diversity & Inclusion Task & Finish Group (Lead Officers Clare Reid, Head of Strategy & Performance, Ben Totterdell, Learning and Engagement Manager and Ellie Woodcock, HR Advisor). A task and finish working group is being set up to support delivery of the Corporate Plan action to review and update the Authority's approach to Equality, Diversity and Inclusion and take positive action to support this. This work will also link in with the Organisational Development process. <i>The group will include officers from across the organisation, plus up to 3 Member representatives.</i> Meets as required.</p>		<p>Mr D Elson (SoS) Mrs C Lawrence (SCC) Miss E Stacey (SoS) Dr S Warren (SoS)</p>
<p>External Funding Working Group (Lead Officer: Dan James, Rural Enterprise Manager). The group is a joint Member / Officer task force to help develop and implement our strategy and approach to securing external project funding towards the Authority's work. <i>Comprises of relevant Leadership and Delivery Team Members and 3-4 Members.</i> Meets as required, usually twice a year.</p>	<p>Miss A V Davis (DCC) Mr D Elson (SoS) Miss E Stacey (SoS) Dr S Warren (SoS)</p>	<p>Miss A V Davis (DCC) Mr D Elson (SoS) Dr S Warren (SoS)</p>
<p>FiPL Assessment Panel (Lead Officer – Alex Farris, Conservation Manager) The group is required to consider applications over the value of £5,000 to the Farming in Protected Landscapes programme and decide which projects should be approved, deferred or rejected. The Panel is required to meet at least every 8 weeks to assess applications and may meet as often as every 4 weeks. The Panel is set up for the duration of the FiPL programme which ends in March 2024. <i>Comprises 4 Members of the Authority plus people nominated by other organisations with a particular interest in Exmoor's farming and ecology.</i></p>	<p>Currently 3 x Core Members Mr R Milton Miss A V Davis Mr J Patrinos</p> <p>Specialist Members – one to attend as per need or by rotation Mr D Elson Farming Miss E Stacey Economy Mrs L Blanchard Heritage / Landscape Dr S Warren Environment</p>	<p>Change to 4 x core Members Mrs L Blanchard (SoS) Miss A V Davis (DCC) Mr D Elson (SoS) Mr R Milton (Parish) Dr S Warren (SoS) Mrs P Webber (Parish)</p>

Partnership Boards and Working Groups	Current Appointments	Expressions of Interest 2022/23
<p>Planning Policy Advisory Group (Lead Officers: Clare Reid, Head of Strategy & Performance & Ruth McArthur, Policy & Community Manager). The Advisory Group assists Officers in relation to the preparation of planning policy and documents to guide the development and use of land in the National Park, and which inform decisions on planning applications and appeals. The group also considers national consultations, and key issues for the community and economy. Meets as required.</p> <p><i>Formal membership of the group is made up of the Chairperson and both Deputy Chairpersons of the Authority, and up to 7 appointed Members, however the meetings are open to other Authority Members to attend if they wish</i></p>	<p><u>Authority Chairperson</u> Mr R Milton (Parish)</p> <p><u>Authority Deputy Chairperson</u> Miss A V Davis (DCC)</p> <p><u>Deputy Chairperson (Planning)</u> Mr S J Pugsley (SWT)</p> <p>Mr J Holtom (Parish) Dr M Kelly (SoS) Mrs C Lawrence (SCC) Mrs F Nicholson (SCC) Mr V White (Parish)</p>	<p>Mr J Holtom (Parish) Dr M Kelly (SoS) Mrs C Lawrence (SCC) Mr A Milne (SWT) Mrs F Nicholson (SCC) Mr S J Pugsley (SWT) Mr V White (Parish)</p>
<p>Rural Enterprise Exmoor Group (Lead Officer: Dan James, Rural Enterprise Manager). A partnership plan group overseeing the sustainable economy priority alongside representative views of Local Authorities and business networks. Provides an advisory role in overseeing progress with the Rural Enterprise Exmoor Vision. <i>Comprises 2 Authority Members – 1 from each side of the county boundary. Meets 2-4 times a year.</i></p>		<p>Mrs C Lawrence (SCC) Mrs F Nicholson (SCC)</p>
<p>Simonsbath Steering Group (Lead Officer: Rob Wilson-North, Head of Conservation & Access) (<i>The group comprises Authority officers and 1 Member appointment (1 sub), together with community and business representatives</i>). The role of the group is to take forward the vision for Simonsbath as a visitor destination following the restoration of White Rocks Cottage, including restoration of the gardens, links to other historic buildings in the area and potential to provide a centre for the interpretation of the Exmoor Forest. Meets as required.</p>	<p>Miss E Stacey (SoS) (Miss A V Davis sub (DCC))</p>	<p>Miss A V Davis (DCC) Dr M Kelly (SoS) Miss E Stacey (SoS)</p>
<p>Visit Exmoor (Lead Officer: Dan James, Rural Enterprise Manager). Visit Exmoor CIC is the recognised tourism industry body promoting Exmoor, its brand and visitor economy businesses. Meets as required, usually six times a year. <i>ENPA are invited to have 1 Member representative as an observer on the board, alongside an Officer observer place.</i></p> <p>In addition, the Exmoor Tourism Network brings together ENPA, Visit Exmoor and local tourism organisations together to act as a <i>Partnership Plan Group</i> with a key role to lead in the development and delivery of relevant action plans set out in the Exmoor National Park Partnership Plan (comprises representatives of the tourism organisations and industry providers). <i>The same Authority Member is required to serve on both Visit Exmoor and the Exmoor Tourism Network.</i></p>	<p>Miss E Stacey (SoS)</p>	<p>Miss E Stacey (SoS) Mr N Thwaites (SWT)</p>

Appointments to Outside Bodies	Current Appointments	Expressions of Interest 2022/23
<p>UK National Parks Chairs Forum (Lead Officer: Sarah Bryan, Chief Executive) NPUK as a formal entity was wound up in 2021, however a 'Chairs Forum' involving all 15 UK Chairs continues to meet at least once or twice a year. The Chairs along with the UK CEOs continue to have sight of the work carried out by NPUK Communications Unit based with the Broads Authority.?</p>	<p><u>Authority Chairperson</u> Mr R Milton (Parish)</p> <p><u>Authority Deputy Chairperson</u> (sub) Miss A V Davis (DCC)</p>	<p>Chairperson of the Authority Deputy Chairperson of the Authority</p>
<p>National Parks England Executive Committee (Lead Officer: Sarah Bryan, Chief Executive) National Parks England exists to promote and further the needs of the ten English National Park Authorities by providing a collective voice; representing their interests to a range of policy makers, Parliamentarians and other decision makers; and raising the profile of the work of the authorities and facilitating discussion on issues of common concern.</p>	<p><u>Authority Chairperson</u> Mr R Milton (Parish)</p> <p><u>Authority Deputy Chairperson</u> (sub) Miss A V Davis (DCC)</p>	<p>Chairperson of the Authority Deputy Chairperson of the Authority</p>
<p>National Parks Climate Change Group (Lead Officer: Clare Reid, Head of Strategy and Performance). The group consists of Member and Officers to champion the development and coordination of policy and action on climate change within the National Parks.</p>	<p>Mr D Elson (SoS)</p>	<p>Mr D Elson (SoS)</p>
<p>Campaign for National Parks (Lead Officer: Sarah Bryan, Chief Executive) The Campaign for National Parks is a national charity that campaigns and speaks out to protect and promote National Parks.</p>	<p>Miss A V Davis (DCC)</p>	<p>Miss A V Davis (DCC)</p>
<p>Exmoor Hill Farming Network (Lead Officer: Heather Harley, Conservation Officer (Farming & Land Management) The Network helps livestock farmers to improve the profitability of their businesses, including the development of strategic projects as well as encouraging access to support and funding. 2 Member appointments.</p>	<p>Mr M Ellicott (Parish) Mr E Ley (NDC)</p>	<p>Mr M Ellicott (Parish) Mr E Ley (NDC)</p>
<p>North Devon AONB Partnership (Lead Officer: Rob Wilson-North, Head of Conservation & Access) The North Devon AONB Partnership's primary task is taking forward the objective of conserving the natural beauty of the landscape of the North Devon Area of Outstanding Natural Beauty.</p>	<p>Mr D Elson (SoS)</p>	<p>Mr D Elson (SoS)</p>
<p>Independent Person Under the Localism Act 2011, the Authority must promote and maintain high standards of conduct by Members and co-opted Members of the authority.</p> <p>To this end the Authority has adopted a Code of Conduct for Members and has agreed arrangements for dealing with any allegation that a member or co-opted member has breached the code. In accordance with the requirements of the Localism Act 2011, these arrangements include the appointment of an Independent Person to advise on breaches of the Member Code of Conduct.</p>	<p>Mr M Riggulsford</p>	<p>Mr M Riggulsford</p>

EXMOOR NATIONAL PARK AUTHORITY

14 June 2022

CORPORATE PLAN REPORT 2021-22

Report of the Chief Executive and Head of Strategy and Performance

PURPOSE OF THE REPORT: To report to Members achievements in delivering the Corporate Plan for the period April 2021 to March 2022.

RECOMMENDATION: The Authority is recommended to:

1. NOTE the achievements in delivering the Authority's key commitments set out in the Corporate Plan 2021-2022 and to formally note Members' and Leadership Team's thanks to the staff for continuing to deliver services and corporate priorities.
2. DELEGATE to the Finance and Performance Advisory Panel and Leadership Team further scrutiny of Authority performance across the Corporate Plan 2022-2023 actions for the reporting period to 31 March 2023.

Authority Corporate Plan: The Corporate Plan 2021-2022 outlines the priorities for the Authority for the period to March 2022 and sets out how the Authority will lead delivery of the Exmoor National Park Partnership Plan 2018-23.

Legal and equality implications: Section 65(4) Environment Act 1995 – provides powers to the National Park Authority to “do anything which in the opinion of the Authority, is calculated to facilitate, or is conducive or incidental to:-

(a) the accomplishment of the purposes mentioned in s. 65 (1) [National Park purposes]

(b) the carrying out of any functions conferred on it by virtue of any other enactment.”

The equality impact of the recommendations of this report has been assessed as follows:

There are no foreseen adverse impacts on any protected group(s). Engagement through the outreach work within the plan is designed to have a positive impact on protected groups.

Consideration has been given to the provisions of the Human Rights Act 1998 and an assessment of the implications of the recommendations of this report is as follows:

There are no implications for the Human Rights Act.

Financial and risk implications: No financial or risk implications have been identified. Performance management exerts a positive influence on financial and risk management.

Climate change response: In October 2019 the Authority declared a Climate Emergency. The Corporate Plan includes many actions which will contribute to the Authority's response, and a specific action plan has been prepared for ENPA. Updates against specific actions are given in section 4 below and Appendix 2 provides a report of ENPA's carbon and progress towards the ENPA carbon neutral target.

1. Introduction

- 1.1 The 2021-2022 Corporate Plan was approved by the Authority on 2 March 2021. It set out the key priorities for the Authority for the period of the Plan.
- 1.2 Performance is monitored quarterly by Leadership Team to ensure that the actions within the Business Plan are being achieved and, if necessary, to provide an opportunity for resources to be re-allocated or to review the proposed action.
- 1.3 This end of year report provides an overview of key achievements during the year and reports on performance against key corporate indicators. There have been some significant achievements throughout the year, and good progress against delivery of the majority of the actions in the Corporate Plan 2021-22. Further details are given in Section 4 below. The areas where there has been lack of delivery, either due to slippage in timescales or actions not progressed, are primarily still due to the legacy left by the covid pandemic and budget restrictions which have placed pressure on staff capacity.
- 1.4 The new scheme Farming in Protected Landscapes (FiPL) Scheme started in July 2021 with some FiPL funded projects now underway.
- 1.5 A government consultation on the Landscapes Review took place. Exmoor NPA submitted a response to the consultation, which closed in April 2022. A formal government response to the consultation has yet to be published.
- 1.6 The delivery of so many of the Corporate Plan actions as detailed below, is testament to the hard work and dedication of staff and Members during an unprecedented time and despite all the disruption and difficulties encountered. Members may wish to join Leadership Team in formally thanking staff for their flexibility and commitment in continuing to deliver services and corporate priorities.

2. Corporate Plan at a Glance

- 2.1 The Corporate Plan 2021-22 outlines the priorities for the Authority for the period April 2021 to March 2022. The actions within the plan follow the Exmoor National Park Partnership Plan ambitions and are grouped as follows:

Corporate Plan at a Glance

PEOPLE 🧑



Exmoor for All:
where everyone feels welcome

- The Exmoor Experience
- Well-managed Recreation and Access
- Thriving Tourism built on Sustainability

PLACE 🌍



Inspiring Landscapes:
diverse and beautiful,
rich in wildlife and history

- Celebrated Landscapes
- Wildness and Tranquillity with Dark Night Skies, and Sensitive Development
 - Valued Historic Environment and Cultural Heritage
- Rich in Wildlife

PROSPERITY 💰



Working Landscapes:
thriving communities and a vibrant local economy

- Working Landscapes
- Strong Local Economy
- Thriving Communities
 - A Valued Asset



3. Performance Report

- 3.1 An assessment of progress against the actions in the corporate plan is given in section 4 below.
- 3.2 Performance against key corporate indicators is set out in **Appendix 1**. These show positive increases in National Park Centre visitor numbers and income following the gradual lifting of covid restrictions. The total number of users at ENPA's Pinkery Outdoor Education Centre is also back up to pre-covid levels, and residential stays resumed again in 2021-22. We continue to deliver a first-class rights of way network, with 97% open and easy to use. The planning service figures are also showing good performance with major and minor applications being determined within national targets, although other applications are slightly below the 80% national target at 77%.
- 3.3 An update on ENPA's carbon footprint and a report of progress against the trajectory to deliver the ENPA 2030 carbon neutral target are given in **Appendix 2**. This additional reporting was agreed as part of the internal audit carried out on ENPA's climate response. The report highlights good progress against actions although these have not yet fed through into the carbon emissions, with the overall carbon footprint increasing by around 8% in 2021/22 compared to the previous year. These increases are consistent with what was anticipated with the return to more normal working practises following covid. The overall level of carbon emissions continues to decline, but there are still significant emissions from ENPA buildings (particularly electricity which is a concern given increasing energy bills), and travel.
- 3.4 **Appendix 3** includes a summary of employee demographics and key indicators of organisation wellbeing. It is worth noting that the Authority currently has a core staff of 53 full time equivalents, which rises to 66 when fixed term contracts are taken into account, and a total head count of 81 staff, slightly up from 77 last year. It underlines the ongoing pressures the organisation is facing regarding staff capacity, which is being exacerbated by difficulties recruiting to some posts. However, the progress against Corporate Plan actions set out in section 4 highlights the significant efforts of staff to continue delivering National Park purposes.
- 3.5 The Authority continues to have an experienced work force with 68% of the Authority's core staff aged over 45. However, this continues to be a limiting factor to people joining the Authority to start their career and creates a future risk with experienced staff potentially choosing retirement at a similar time. The Authority's median gender pay gap remains at 0% which is positive, although the diversity of staff remains low, reflecting the ethnic make-up of the National Park and surrounding areas.
- 3.6 Sickness levels per full time equivalent have decreased this year but the number of occasions of sickness absence being reported has increased to 52 (compared to 43 in 2020/21). This increase in recorded sickness absence is linked to the increase in coronavirus cases (16 absences relating to coronavirus compared to 7 absences last year) and where staff were not well enough to work at home. During the period there were three staff accidents, three public accidents (two at Pinkery, one member of the public), and no accidents/incidents reported from volunteers.

- 3.7 The annual customer feedback report is given in **Appendix 4**. This includes a summary of the compliments, complaints, freedom of information requests and customer survey results. 76 written compliments were received in 2021/22 relating to work across the organisation. We receive many more through the visitor books in National Park Centres, calls to our offices or in conversation with officers in the field.
- 3.8 The Authority received 6 complaints regarding the provision of its services via the formal complaint's procedure. Five were not upheld and one was partially upheld. One complaint was referred to the Local Government and Social Care Ombudsman who did not investigate the complaint as it was something that was considered could be dealt with through existing channels. The Authority received 47 requests for information using the Freedom of Information Act 2000/Environmental Information Regulations 2004.

4. Progress delivering Corporate Plan actions

- 4.1 The sections below detail progress against Corporate Plan actions. In addition to the numerous successes marked in green, areas where progress was not on target are marked in amber and include areas where there was not as much progress as expected, timetables slipped, or where progress was not made due to factors outside the Authority's control. Actions marked red are those which were not completed or progressed, these primarily relate to ongoing restrictions as a result of covid 19 or officer capacity.

4.2 People – The Exmoor Experience

Highlights:

- Volunteering has gained good momentum this year following the challenges of covid restrictions. By August ENPA had resumed all our previous volunteer activities, with appropriate covid guidance in place. ENPA volunteers have given over 793 days of their time this year, a 30% increase on the last. Sign up to Exmoor NPA's Get Involved contacts list is up 15.5% on last year.
- The iNaturalist app proved an invaluable survey tool on the ENNIS invasive species control project. Born out of this success the #LookWild project is using this app to bring together wildlife sightings across all UK National Parks. Get Involved plays a key coordinating role in this project which now has over 200,000 observations.
- Partnership working remains a key objective of Get Involved and Butterfly Conservation and ENPA volunteers joined forces for a well-attended habitat management day at Haddon Hill.
- Our Learning and Outreach service at Pinkery Outdoor Education Centre has continued to provide safe educational experiences with 2021-22 being a busy and productive year. The additional resources provided by Generation Green has enabled us to deliver inspiring learning experiences to a wide range of young people - including some from new schools and from urban settings.
- Climate change awareness is embedded in the work of the Learning and Engagement Team as is an integral part of our delivery both at Pinkery and our wider education work. This has also been a key part of our Young Rangers

programme - and in the Youth Conference attended by education staff and two Young Rangers.

- In 2021-22 a strategic review of National Park Centres was started, with improvements commissioned and the aim to implement these in autumn 2022.
- Retail spend has been a record high at £123,613, this figure includes the new online shop. Dunster achieved Silver in the Bath, Bristol and Somerset Tourism Awards and Bronze in the South West Awards.
- On public engagement events the Dark Skies Festival had a change in emphasis to more, smaller engagement events delivered at key hotspots such as Tarr Steps and Valley of Rocks. This has shown to be a good use of our limited staff resources and will continue during 22/23.

4.3 People – Well-managed Recreation and Access

Highlights:

- On Visitor Management a Summer Assistant Ranger, Ranger Support casual contracts and volunteer effort provided good capacity to visit all honeypot sites frequently over the Summer. Litter was dealt with promptly. There were 8 Ranger led pop-up engagement events at popular sites over the Summer. Campervan and new visitor leaflets were issued to the public and several landowners for their own use. Visitor numbers were manageable despite an estimated 50% increase at popular sites, based on pre-covid income at Tarr Steps and Valley of Rocks. Liaison with police and the community is ongoing with a special group in place for Wimbleball-Bessom Bridge, all supported by our partnership with the Exmoor Rural Crime Initiative. Three Rangers have become accredited with the Community Safety Accreditation Scheme (CSAS) which provides the accredited Rangers with some limited police powers.
- The Public Rights of Way network has maintained a high score above target with 97% RoW open and easy to use. A key new permitted link path has been implemented with the kind support of the Lilycombe Estate.
- Due to the storm damage early in 2021 there has been very little drainage clearance this year and FST have fallen behind with other routine works.
- There has been slow progress with the family friendly cycle trails due to staff capacity. The loss an external project officer and a landowner change of mind have caused much delay.
- Good progress has been made on developing a series of 'Exmoor Classics' range of longer walks although due to capacity publication has been delayed until Quarter 2 of 2022.
- Fundraising for Great Bradley Bridge continued to go well. The specification has been completed alongside a planning proposal. A decision is expected in June 2022.

4.4 People – Thriving Tourism built on Sustainability

Highlights:

- Exmoor NPA has continued to work with tourism partners to support a sustainable approach to tourism recovery in the wake of the pandemic.
- The English National Park Experience Collection project has been successfully transitioned to a set of experiences that can be booked by independent domestic visitors. Uptake has been low through the UK NP website, but the principles applied to the product development can be seen extending across a range of providers increasing the quantity and quality of authentic National Park linked visitor experiences in Exmoor.
- Eat Exmoor branding is now clearly visible at many locations across the National Park within retailers and hospitality providers. Some strong promotional assets have been developed and promoted and new initiatives such as the Young Chef competition launched.

4.5 Place – Celebrated Landscapes

Highlights:

- Progress has made with visioning for nature recovery on ENPA land holdings on the former royal forest, as part of progressing land visioning to develop a concept plan for the area.
- White Rock Cottage was transferred to the Simonsbath & Exmoor Heritage Trust in September 2021. Restoration of Ashcombe Gardens is continuing with volunteers. Designs for three bridges in the garden have been developed and consulted on.
- Restoration of the Ashley Combe designed landscape continues through targeted woodland management and enhancement works. Further works to open viewpoints, reveal specimens of Torridon pines and other Lovelace era plantings have been completed. Areas above the formal garden (private) have been prepared for planting.

4.6 Place - Wildness & Tranquillity, Dark Night Skies and Sensitive Development

Highlights:

- 2021-22 was the 10th Anniversary of Exmoor NPA 's designation as a Dark Sky Reserve. Over 20 businesses have been accredited as dark sky friendly and a new experience for the public was created with a Dark Sky Discovery Trail.
- The Design Working Group has been re-established. After reviewing other national park design guides Exmoor NPA's existing Design Guide has been appraised and a broad structure and format for a new guide agreed.

4.7 Place – Valued Historic Environment and Cultural Heritage

Highlights:

- 2021 -22 saw work to understand condition issues in Conservation Areas. New Conservation Areas have completed appraisal documents and are now ready for consultation.

- The data processing work involved in moving National Records of Historic Environment to the Exmoor National Park Historic Environment Record commenced in April 2021, this is due for completion in May 2022.
- We continue to support volunteers working on recording Dunster's early buildings and maintaining Exmoor's historic signposts. Management plans have been developed for four Scheduled Monuments on the ENPA estate. New forms and guidance have been developed for monitoring Scheduled Monuments for a survey with the aid of volunteers, with 5% of sites monitored so far with the aim of the survey to be completed in 2022.
- A series of online seminars were held to update the Historic Environment Research Framework on 15 research objectives, including heritage at risk from climate change and other factors. A draft report has been produced.

4.8 Place: Rich in Wildlife

Highlights:

- Following further consultation with Exmoor Hill Farming Network, refinements to the structure of the Exmoor Nature Recovery Vision have been made, to ensure the aims and targets are readily understood. Completion of the revised report is expected soon.
- ENPA officers and the National Trust have collaborated to submit a Landscape Recovery bid in May 2022. This is aimed at working up a package of incentives to encourage farmers on the coastal belt to work together to participate in landscape scale nature recovery, including more trees and woodland in the landscape.
- The Mires team (South West Peatland Partnership) submitted an application to Natural England's Nature For Climate Peatland grant and were successful in securing £9m plus an additional £3m from South West Water for a programme across the Southwest's three moors on Exmoor, Dartmoor and Bodmin. ENPA are currently working with the Mires team over the proposals for Exmoor.
- No progress has been made on trial planting in the upper Exe Valley as external funding was not forthcoming. Two areas amounting to 17ha have been identified for possible woodland creation and planning grants have been secured from the Forestry Commission. It is intended to progress with these over the winter of 2022/3 and 2023/4.
- £15,000 of funding has been secured from the Devon Environment Fund and £8,000 from CareMoor for the Exford Tree Nursery. Development has begun with the site secured and infrastructure being developed. Planning Permission has been submitted for a store and potting shed and we hope to submit further grant applications to the Forestry Commission Tree Production Capital Grant fund.
- Work to update the Exmoor Wildlife Research and Monitoring Framework is ongoing, with a review of the Exmoor Priority Species list.
- In 2021 the ENNIS project got consent to treat 92% of the 860 knotweed sites that the project treats and 18 skunk cabbage sites were treated. 29 sites were treated with organic Rootwave technology including knotweed, montbretia, skunk cabbage and giant hogweed. As a result of the project there has been a 90% reduction in Himalayan balsam in 6.4km of the River Barle SSSI. In total there have been 50

active ENNIS volunteers that have dedicated time regularly to the project amounting to 2,900 hours of volunteer time equating to around £63,000 of volunteer effort. Applications have been submitted to FiPL to continue the project until March 2024.

- Launched in 2021 with funding from CareMoor, South West Water and Natural England, *The Exmoor Sowing the Seeds* project is a collaboration between Exmoor National Park Authority, FWAG South West, Devon Wildlife Trust, South West Water and Natural England to collect and distribute wildflower seed locally. To date a 3 ha meadow has been harvested and 60kgs of species-rich seed collected from a farm near Withypool. The project has funded a vegetation survey of the donor meadow to provide a baseline for future monitoring and potential impacts in species composition post seed-harvesting. To date five holdings across Exmoor have received seed, which has now been sown. We are supporting them with any after care advice as required. The Project has now purchased a brush harvester and vacuum harvester of its own. Contact has been made with further donor and recipient sites for the 2022 season. Through Natural England funding and in collaboration with the Devon and Somerset Biodiversity Records Centres, a project to develop a better grassland evidence base has been completed. It will increase understanding of grassland restoration approaches in an Exmoor context.

4.9 Prosperity – Working Landscapes

Highlights:

- The first year of the Farming in Protected Landscapes (FiPL) scheme saw 31 projects progressed with the whole first year budget of £226,000 allocated and spent. Projects across over 20 farms and smallholdings help with nature recovery and other partnership plan ambitions and also help farmers transition to the new Environmental Land Management scheme. Year two has already progressed well with half of the programme budget now awarded to projects.
- Engagement and consultations have begun to support delivery of national ambitions for appropriate woodland planting. Work is underway to present opportunities and visualisations of woodland creation to illustrate the nature recovery vision. Generous support from Somerset West and Taunton Council (SWT) has enabled us to appoint a Treescapes Officer to take elements of the Woodland Strategy forward.
- Government legal challenges and market impacts continue to affect game shooting. The scale and impacts of game shooting on Exmoor's special qualities remain poorly understood.
- Six Exmoor Pony foals were born on Haddon Hill in 2021-22, two fillies and four colts. The four colts have been sold to the Quantock Hills AONB.

4.10 Prosperity – Strong Local Economy

Highlights:

- Significant engagement with businesses and stakeholders led to a very successful launch of the Rural Enterprise Exmoor vision. The focus is now on finding ways of delivering further action, but even without this the vision is being used to feed into and influence other work streams.

4.11 Prosperity – Thriving Communities

Highlights:

- The Exmoor Rural Housing Network was relaunched in October and held its second meeting in March. Advisory work continues on affordable housing sites. Joint working with the housing authorities has continued including regular updates with the SWT enabling housing team and Rural Housing Enabler for Somerset in ENP.
- Work on the 2019/20 & 2020/21 Authority Monitoring Report on implementation of the Local Plan is near completion. Work has been impacted by the need to redirect resources to progress the Local Plan 5-Year review.
- There has been substantial progress on Local Plan 5-Year Review, including evidence review, consultation through workshop and survey and engagement with Duty to Co-operate partners. The review is due to be concluded by early July 2022.
- Regular liaison has continued with virtual Exmoor Rural Crime Initiative (ERCI) meetings. The relationship built with partners through the ERCI meetings have proved invaluable in assisting with issues arising and being able to access police intel.

4.12 Prosperity – A Valued Asset

Highlights:

- The Government's consultation response on the Landscapes Review was launched in January 2022 with a 12-week consultation deadline. A paper went to Authority in April 2022 and the Authority's response to the consultation was submitted.
- Good progress has been made with preparations for both the UK National Parks Conference in November 2022 and Society of National Parks Staff (SNPS) Conference in May 2022, with strong delegate bookings received. It is clear this will be a significant piece of work and will require substantial staff input over the coming months. The sponsorship secured for the UK National Parks Conference allows there to be no additional budgetary pressure on the Authority. The SNPS Conference will be self-funding.
- We have maintained a good relationship with the Local Enterprise Partnership despite the uncertainty of their role going forward. Some clarity on this has now been secured and as a result the link with the National Park may be less significant. Instead, we will need to focus on working with the new unitary (Somerset) and emerging devolution agenda in Devon (County Deal).

4.13 Monitoring and Research

Highlights:

- The 2021- 2022 Deer Count went ahead, and we are currently collating results. The Monksilver & Stogumber Deer Management Group count has not happened due to a lack of capacity.
- A Review of the State of the Park monitoring framework and Special Qualities is underway.
- The Visitor Survey was completed, and results disseminated.

4.14 Corporate Priorities - Manage Corporate finances and diversify income streams

Highlights:

- 2021-22 was a strong year for CareMoor. General donations have risen following a drop in the previous year due to covid. General contributions totalled £28,654, of which nearly £18k was raised for the Woods and Tree Appeal launched in June 2021, and a further c£5k for access including Donate a Gate and the old signpost sales. Business support from our CareMoor Champions totalled around £4.6k. CareMoor funding has been used to support a number of projects including Woodside bridge, wildflower meadows, historic signposts maintenance, planting in Ashcombe Gardens, and the establishment of the Authority's tree nursery at Exford growing trees from locally collected seeds and plant material to be planted in woodland creation projects around Exmoor. ENPA is also the beneficiary of two significant legacies totally around £450k. Initial allocations have been made to the royal forest landscape programme, coastal nature recovery, and match funding for future CareMoor donations and further work is underway to develop these proposals in 2022/23.
- The external funding prospectus took longer to develop than expected due to staff capacity, but was approved by Members in May 2022. Work is ongoing to showcase selected potential projects to our partners, supporters, and funders. We also have a live project pipeline of 30 plus projects, ensuring we're in a strong position to secure external funding with some success already achieved.
- Work has started on the programme of enhancement works for Exmoor NPA car parks. The Valley of Rocks scheme was developed, taken through the planning process and the works completed by April 2022. Other car park improvement schemes have been delayed due to lack of capacity but are a priority for 2022/23.

4.15 Corporate Priorities - Work with communities, businesses, and partners to deliver the National Park Partnership Plan and statutory purposes.

Highlights:

- A mid-term progress report was completed for the National Park Partnership Plan, and disseminated to partners. This highlighted the significant amount of partnership working that is helping to deliver the Ambitions in the Plan. The first Partnership Plan Chairs group meeting was held to discuss the progress of the Partnership Plan. A series of themed cross-cutting workshops are planned for 2022-23.

4.16 Corporate Priorities – Respond to the climate emergency and work towards becoming a carbon neutral National Park

Highlights:

- ENPA Climate Action Plan. The ENPA Climate Action Plan was approved by Members in August 2021. The focus of priority actions is on decarbonising ENPA buildings which account for 70% of the ENPA carbon footprint. Analysis of the energy demands of ENPA buildings has been carried out, and this has identified key interventions to make to reduce energy demands, improve energy efficiency and increase renewable energy generation. Funding for decarbonisation of Pinkery Outdoor Education Centre was secured through the Public Sector Decarbonisation

Scheme, including replacing the oil boiler with a biomass boiler, installing additional renewable energy capacity, and undertaking energy efficiency measures. The first phase of secondary glazing was installed at Exmoor House and the remaining windows will be done in 2022/23. Five electric charge points are being installed at Exmoor House, Exford Depot and Pinkery, and the Pinkery minibus will be replaced with a smaller electric vehicle during 2022/23. Plans are being progressed for replacing a pool car and potentially a Ranger vehicle with electric vehicles in 2022/23.

- ● **Carbon Neutral National Park.** Funding from was secured from Natural England to prepare a carbon footprint assessment for Exmoor and other National Parks, so that a consistent assessment is available across all the National Parks. This will be completed in 2022/23 and will provide a basis for discussions with Partnership Plan groups to agree actions to reduce the carbon footprint and work towards being a carbon neutral National Park. ENPA continues to input to the Devon and Somerset climate partnerships.
- Tree planting at ENPA's 12ha Bye Wood is progressing well, with the public and volunteers involved in planting and gathering seeds. We are championing plastic free tree planting and will use a mixture of species chosen for climate resilience. Plans for Exford tree nursery are also progressing.
- The ENPA Education team have been engaging with Year 10 children on climate change via an online survey, workshops in local schools, and the Young Rangers residential at Pinkery. The outputs were reported to ENPA members in November 2021 and will help inform future activity and engagement with young people. A film detailing the role of Exmoor National Park in responding to climate change was launched as part of our communications in the run up to the UN Conference on Climate Change in November 2021. This is available on the ENPA website along with ideas for actions that individuals can take Exmoor - Climate Action (exmoor-nationalpark.gov.uk).
- The National Park Centre received some positive feedback from the judges in the tourism awards, finding that the Centre is doing an excellent job in promoting the ethical, sustainable and responsible aspects of the National Park.
- ● Exmoor has been accredited as being a **Plastic Free Community** by the Surfers Against Sewage Plastic Free Communities Team. We will be the first National Park to achieve this. We will build on this work during 2022/23.

4.17 Corporate Priorities - Develop and maintain effective and efficient services

- ● Overall performance of the planning service against national targets has improved and while there is a reliance on temporary agency planners the team have worked incredibly hard and performance is more consistently exceeding national targets. Likewise, the enforcement case load has been decreasing recently and improvements to processes are assisting with efficiencies. No significant progress has been made on proactively promoting planning decisions due to capacity issues. Recruitment to planning roles continues to be an issue, reflecting the situation nationally.

- Plans to develop and implement a new organisational Development Strategy have been delayed due to coronavirus and staff working at home. The programme will be focussed on during 2022/23, where engagement with staff will be more productive.
- With coronavirus and lack of staff capacity, we have not been able to provide our usual short study/work placements and internships. We provided work experience for one student within our Ranger Team. Our Conservation Intern secured a fixed term contract to help deliver FIPL. We did not have any positions filled for the Government Kickstart Programme mainly due to our location and the lack of transport to enable young people to travel to work.
- Progress continues with the web project. We are looking to stay with the same Content Management Provider but with a completely new design and template. We are currently finalising some of the technical details around functionality before hopefully beginning work on the new site in early summer 2022.

4.18 Corporate Priorities - Manage the Authority's Estate and operations to support delivery of National Park purposes

- Land Visioning continues to be a priority for ENPA. We have progressed car park schemes at Ashcombe and Valley of Rocks. We have rapidly progressed tree planting at Bye Hill. We have developed visualisations and mapping for our aspirations on the former royal forest, and we are in discussion with external funders over the royal forest landscape and also on our coastal holdings.
- ENPA Estate. The main maintenance projects for this year included the external repair and redecoration of the Town Centre Offices Dulverton, and Lynmouth Pavilion. These projects were delayed due to difficulties tendering the works and are now due to be undertaken in 2022/23. Ongoing maintenance included further works highlighted by the 2020 condition survey of our public conveniences. Planning permission was secured for improvements to the buildings at Pinkery and installation of wood burning stoves, with work to be completed during 2022. There were no planned works at Weir Cleeve this year but some minor emergency rock slope works were undertaken in June. As part of the car park improvements, the Valley of Rocks car park machine was upgraded and an addition machine installed, and a new parking meter installed in Ashcombe. The service continues to move away from reactive to proactive maintenance across all assets. We have become aware of the need to re-roof Exmoor House in stages, and a new condition survey for the building will be commissioned.

Clare Reid, Head of Strategy and Performance

Hazel Malcolm, Business Support Officer

Ellie Woodcock, HR Adviser

June 2022

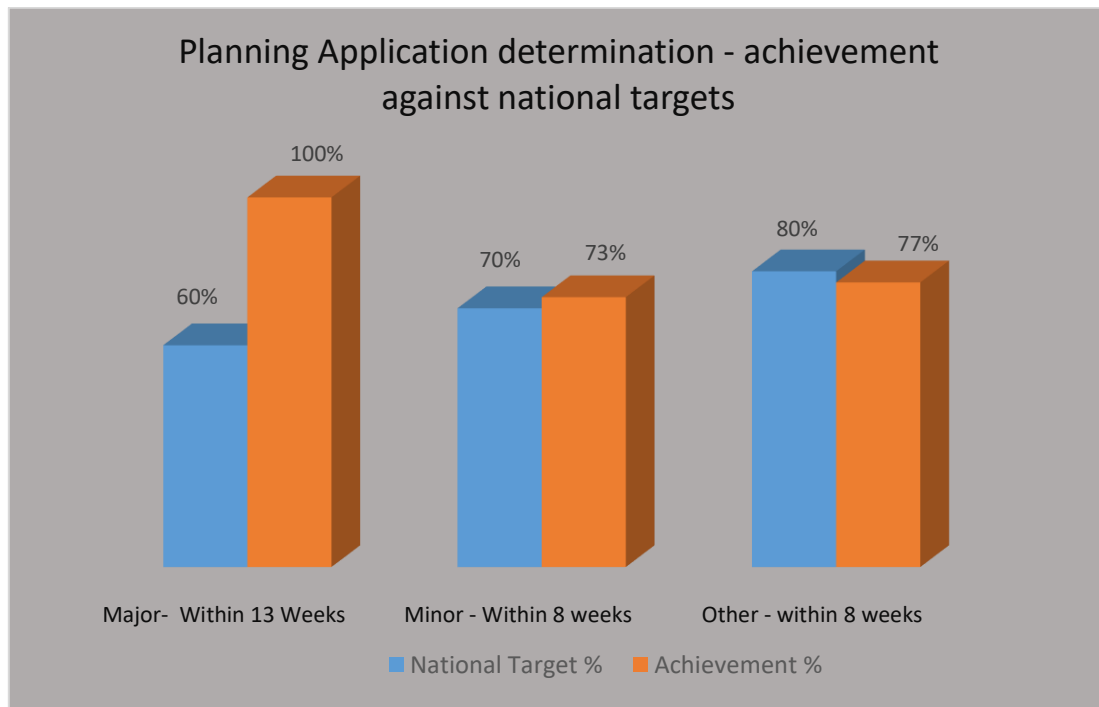
Background papers on which this report, or an important part of it are based, constitute the list of background papers required by Section 100 D (1) of the Local Government Act 1972 to be open to Members of the public comprise:

Corporate Plan 2021-22

Key Corporate Indicators 1 April 2021 to 31 March 2022

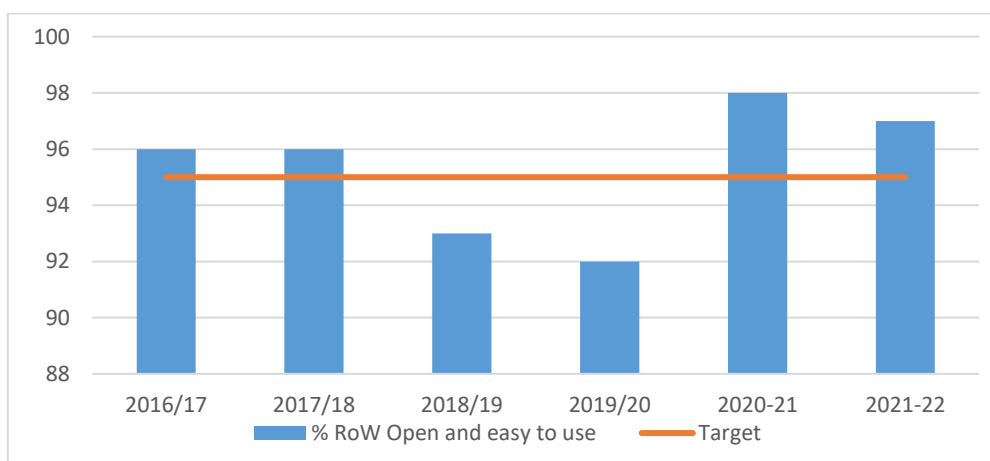
Planning Application determination – achievement against National targets

- Most planning applications are now determined in accordance with national targets, although other applications have fallen slightly below.



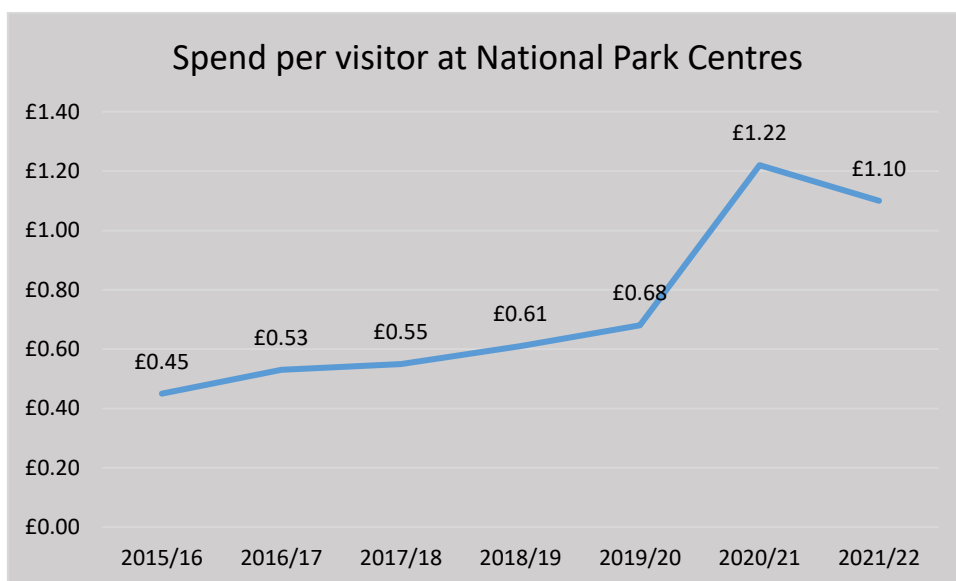
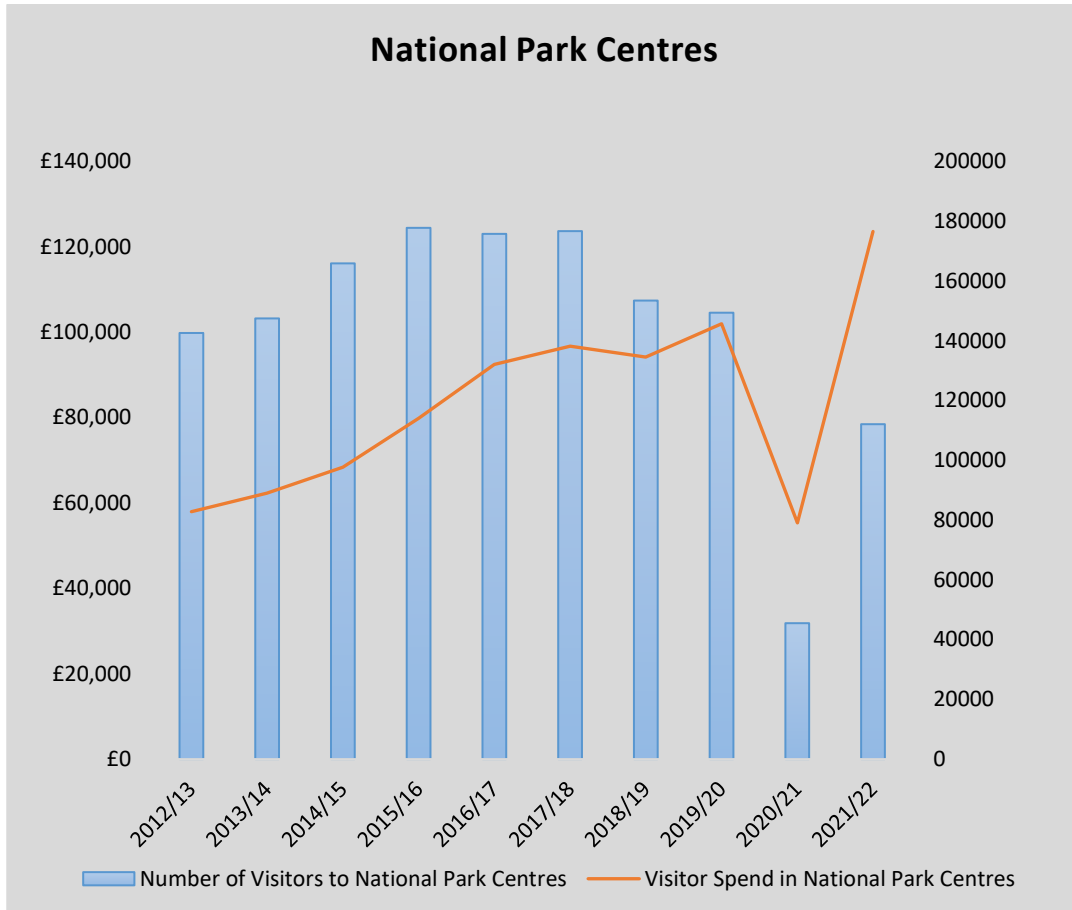
Rights of Way Open and Easy to Use Score

- 97% of our rights of way are open and easy to use. This was over the target of 95%, another fantastic achievement for 2021-22.



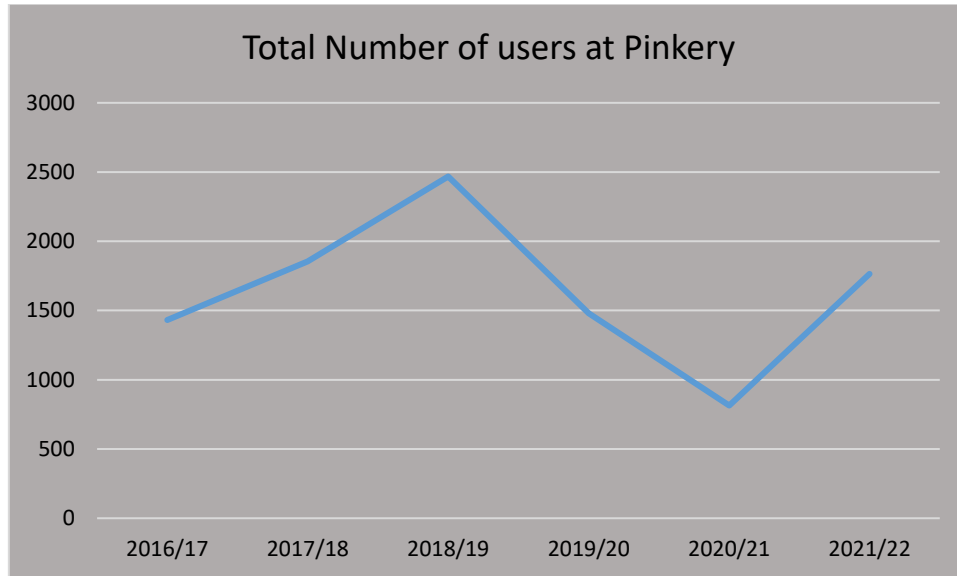
National Park Centre Visitor Numbers and Income Trend

- Total visitor numbers are significantly up at 112,089 compared with 45,282 last year, reflecting the lifting of lockdown restrictions.
- Visitor spend is also up, at £123,613 compared with £55,346 last year. This does include the new online shop. Spend per visitor has remained steady at £1.10, a small drop of 12p per visitor on last year's figure of £1.22.



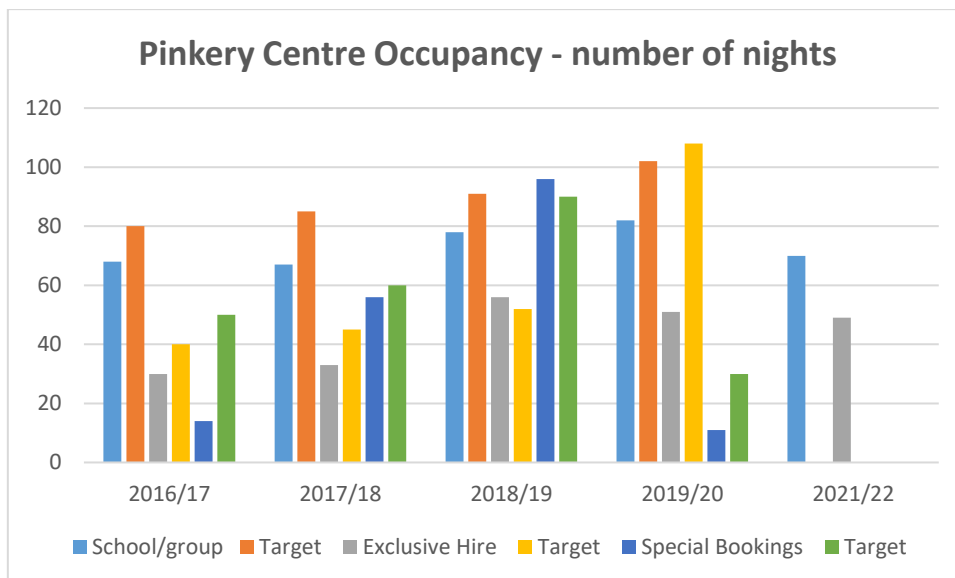
Education and Outreach

- The total number of users at Pinkery is back up to levels last seen in 2017/18 at 1,765 (compared with 814 in 2020/21 and 1,481 the previous year)



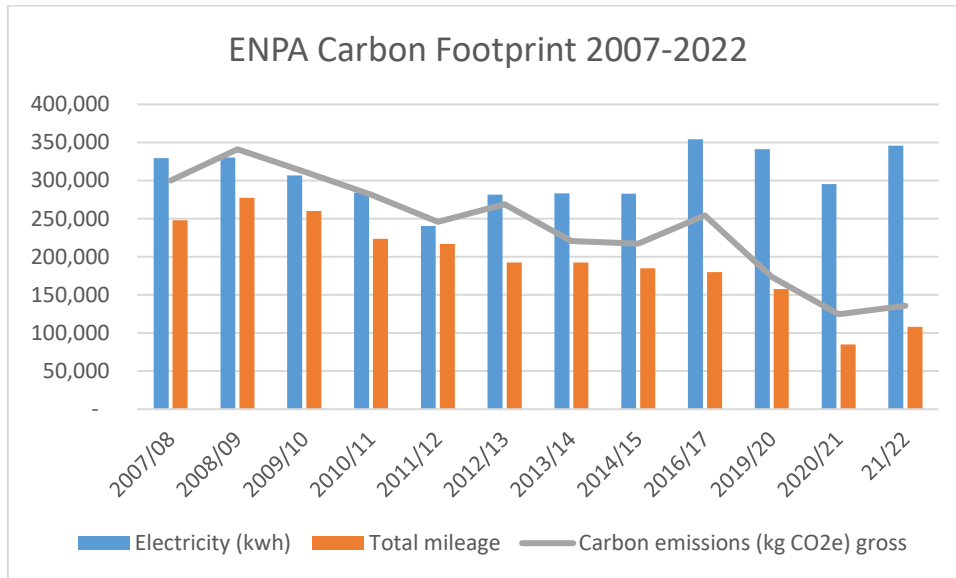
Pinkery Centre Occupancy Rates (number of nights)

- Schools could book overnight stays again in 2021-22, with a total of 70 overnight stays.
- No targets have been set for the last two years due to the unusual situation caused by the pandemic.
- Figures for 2020-21 are not included in the graph below as schools only went ahead with day visits for 2020-21, which in total were attended by 634 pupils and staff.



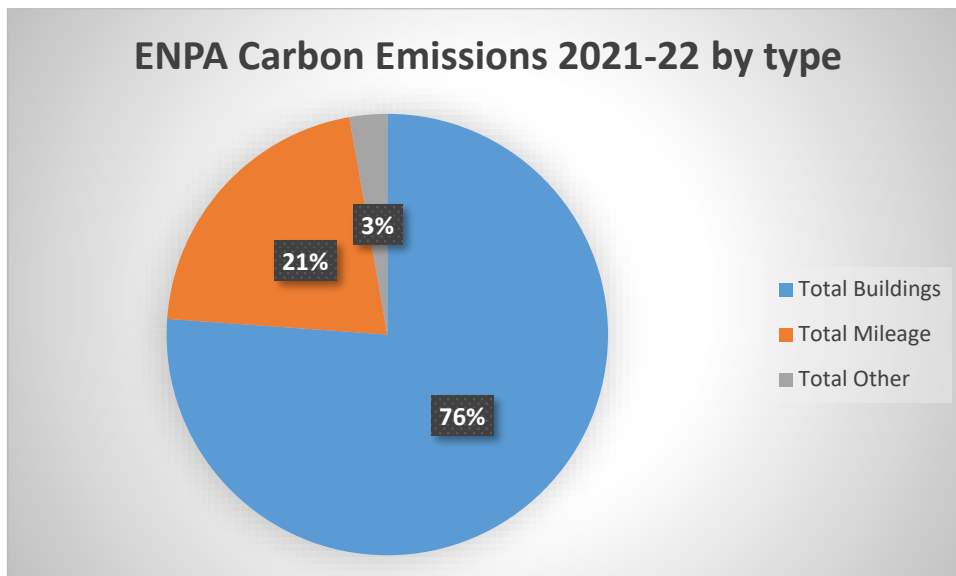
ENPA Carbon Footprint Annual Report 2021-22

In 2019 ENPA declared a climate emergency with a target of being carbon neutral by 2030. An action plan was approved in 2021. Progress towards this target is set out below.



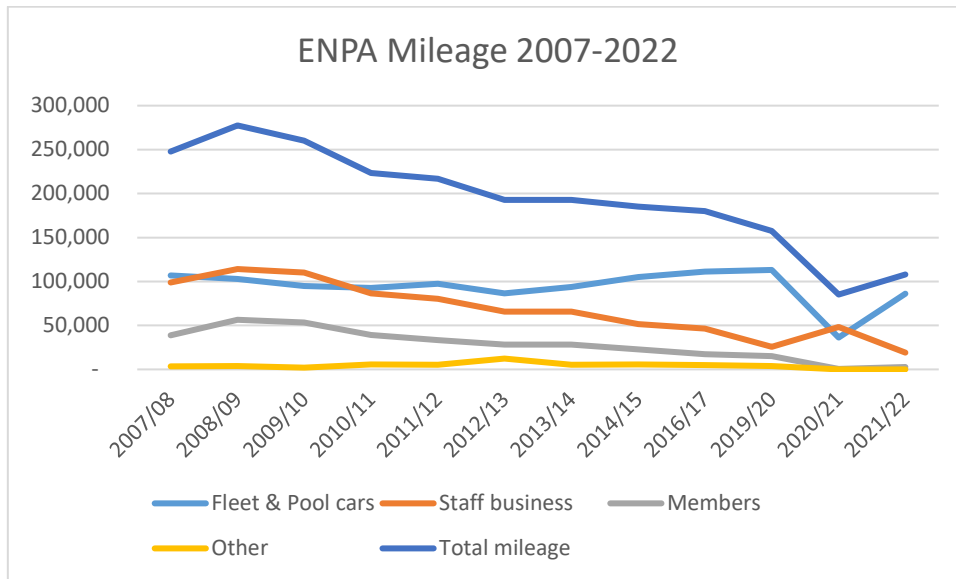
ENPA's carbon footprint has increased in 2021/22 from the previous year as expected, as the organisation returns to more normal operations following the covid pandemic. Electricity usage remains high which is a concern given increasing prices.

Breakdown of carbon emissions



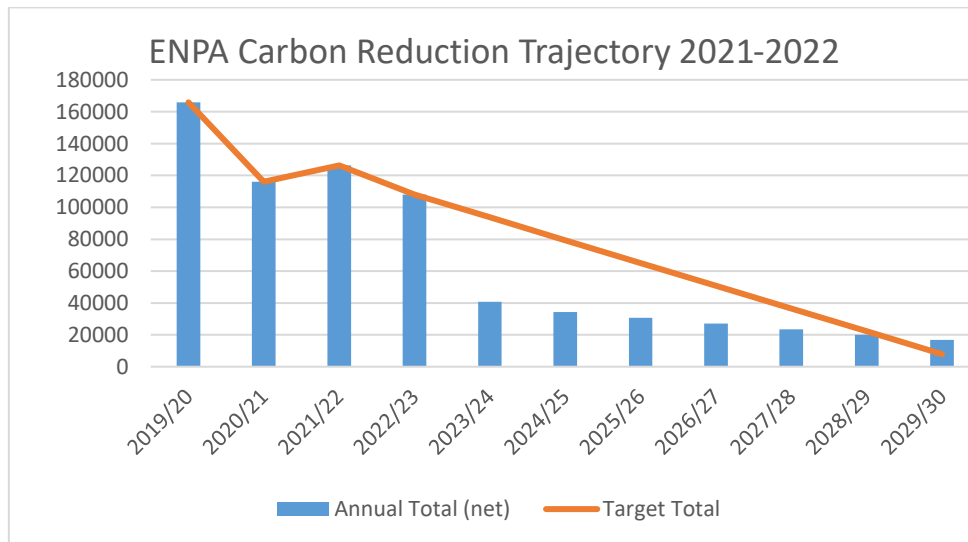
ENPA buildings continue as the most significant source of ENPA emissions, followed by mileage. The vast majority of emissions from buildings is from electricity usage, particularly for heating. The oil boiler heating system at Pinkery is the other significant source of emissions.

ENPA Mileage



ENPA mileage has increased again following the reductions seen during the covid pandemic although it has not yet returned to previous levels. Staff business mileage has fallen, with a corresponding increase in fleet & pool car mileage as staff return to using ENPA vehicles for work trips rather than their own vehicles as covid restrictions were lifted.

ENPA carbon neutral trajectory



Good progress is being made towards meeting the 2030 carbon neutral target for the Authority. Although total emissions went up in 2021/22, measures taken during that year should result in a fall in emissions the following year. The measures include:

- secondary glazing at Exmoor House (phase 1 targeting the coldest rooms at the rear)
- installing LEDs at the Exford Depot
- replacement of mobile plant with electric alternatives

Funding has also been secured for a number of measures at Pinkery Outdoor Education Centre which will be completed in 2022/23, including:

- replacing the oil boiler with a biomass boiler
- energy efficiency measures
- increased battery storage capacity
- additional solar PV panels
- solar thermal panels

These measures are estimated to save around 30 tonnes of carbon annually, the impact of these savings should be seen in the 2023/24 emissions figures and are reflected in the carbon trajectory graph.

Other carbon reduction measures planned for 2022/23 include:

- secondary glazing at Exmoor House (phase 2 covering the remaining rooms)
- replacement of the Pinkery minibus with an electric vehicle
- potential replacement of a pool car / Ranger vehicle with electric vehicles
- installing EV charge points at several ENPA properties
- installing LEDs in additional properties
- An audit of high demand electrical items and planned reduction in printers to reduce electricity consumption and minimise paper use
- Further woodland planting on the Barle

Renewable energy generation

During 2021/22, around 36,751 kwh of renewable energy was generated, saving around 9 tonnes of carbon. This is an underestimate as not all renewable energy generation can currently be monitored.

Carbon offsets

ENPA is undertaking the biggest woodland creation project in the past 15 years at Bye Wood, near Winsford. This will include planting 13,000 trees over 12 hectares, using only locally sourced wood. Careful structural planting will support tree growth and resilience to a changing climate, and sustainable organic and physical methods of planting will be used in preference to chemicals. Tree guards will be plastic free. The new woodland will nurture new wildlife habitats and include community areas to connect people with nature.

Bye Wood will be accredited with the Woodland Carbon Code and over the next 20 years it will sequester around 688 tonnes of carbon. Due to the time lag in being able to report carbon offsets as the trees mature, it will not be possible to count the carbon sequestration as part of ENPA's 2030 carbon neutral target. This will start to be included in the figures from 2032 onwards.

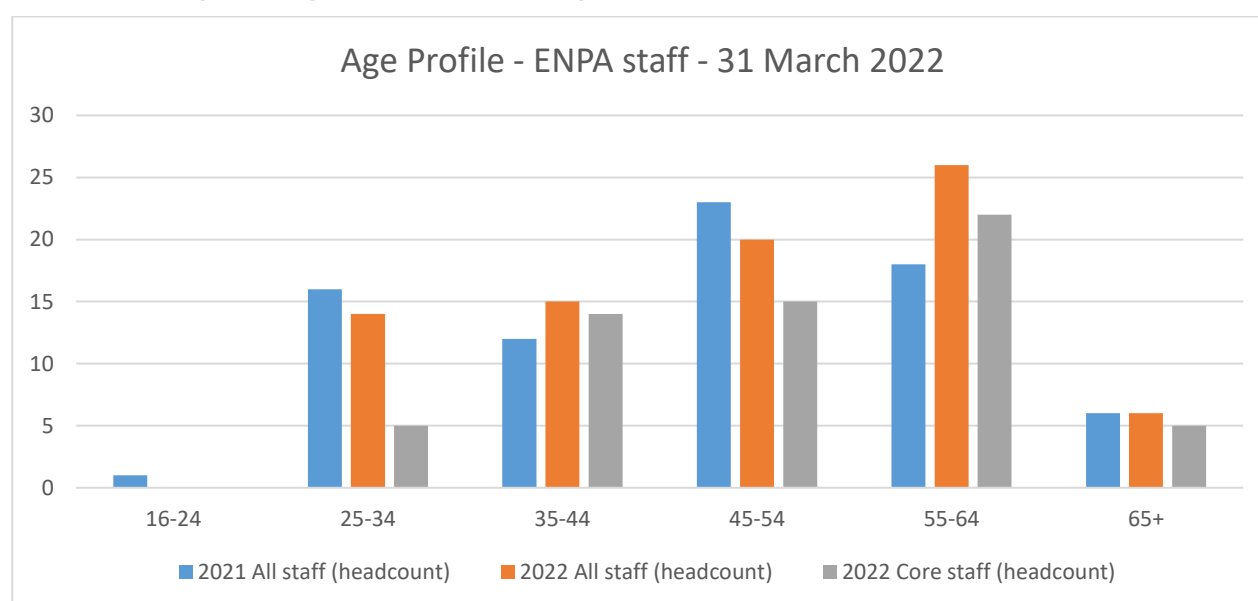
ENPA EMPLOYEE PROFILE 31 March 2022

A summary of employee demographics and key indicators of organisation wellbeing for the period 1 April 2021 to 31 March 2022.

NUMBER OF EMPLOYMENT CONTRACTS HELD (core staff in post 31 March 2022)

Section	Headcount	Full Time Equivalent
Support to Land Managers	21	19.19
Support to National Park Users	8	6.72
Support to the Community and Business	16	12.53
Strategy and Performance	6	5.60
Finance and Operations (includes ICT)	6	5.60
Land and Property Services	3	2.20
Chief Executive	1	1.00
Total (Core staff in post)	61	52.84
<i>Vacancies (Rural Surveyor)</i>	<i>1</i>	<i>1.00</i>
Non-Core (Seasonal/Project/Partnership/trainee) contracts	21	15.64
Total (all staff) <small>(Note: true headcount is 81 as 2 members of core staff hold 2 contracts)</small>	83	65.76

AGE PROFILE (staff in post 31 March 2022)



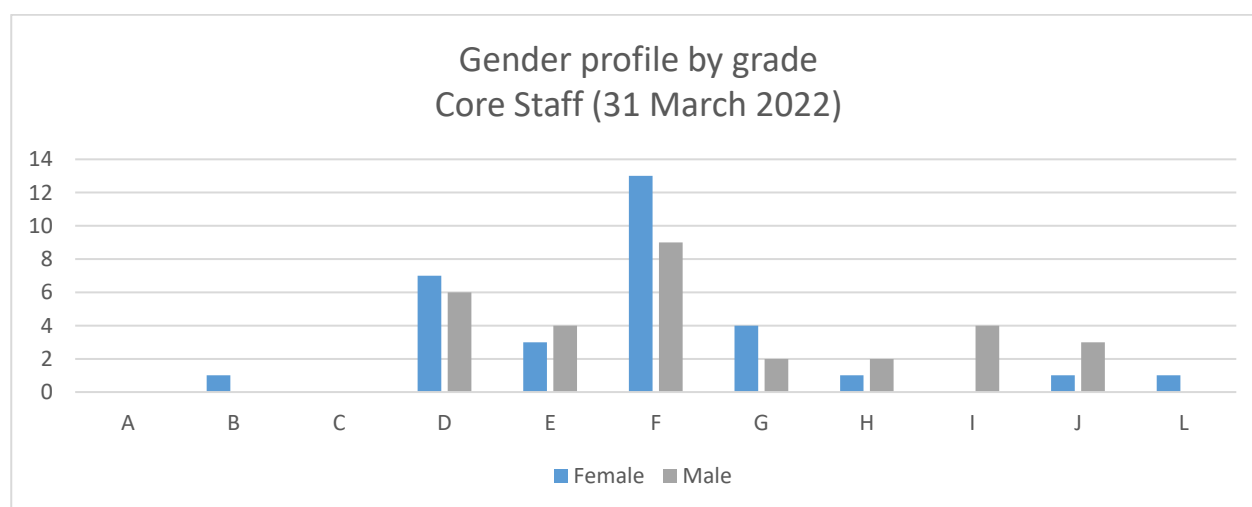
The Authority's stability index has lowered this year (75% of core staff have over 3 years of service, 80% on 31 March 2021). The Authority continues to have an experienced work force with 68% of the Authority's core staff aged over 45. However, this continues to be a limiting

factor to people joining the Authority to start their career and creates a future risk with experienced staff potentially choosing retirement at a similar time.

The Conservation Intern was successfully recruited to FIPL Administrator (a 3-year fixed term contract position). The Government's Kickstart programme was unsuccessful as we did not have any expressions of interest for any of the posts. This was due to our location and difficulties with transport, as well as driving tests not taking place. Other National Parks experienced similar issues. We have not been able to offer further internship opportunities, but we are keen to look at this again in the future.



GENDER PROFILE BY GRADE (core staff in post 31 March 2022)

CORE STAFF GENDER PROFILE (BY GRADE)			
Grade	Top of Pay Scale £	Female Staff	Male Staff
A	18,516	0	0
B	19,264	1	0
C	20,043	0	0
D	22,129	7	6
E	25,927	3	4
F	30,095	13	9
G	35,336	4	2
H	41,591	1	2
I	48,219	0	4
J	55,917	1	3
K	Not used		
L	86,985	1	0
Total posts		31	30
Average (mean) salary 2021/22 (based on top salary point for each grade)		Female £31,001 £29,401 Without CE post included	Male £34,060



QUARTILE DATA					
	Women	Male	All	% Women	% Male
Lower (A-C)	1	0	1	100	0
Lower Middle (D-F)	23	19	42	55	45
Upper Middle (G-I)	5	8	13	38	62
Upper (J-L)	2	3	5	51	49
	31	30	61	51	49

The overall mean gender pay gap¹ has decreased to 8.1% (from 8.5% in 2021). The median pay gap² is more typically used as a measure nationally as outliers can skew the mean, particularly in small data sets such as these. **The Authority's median gender pay gap remains at 0%.** According to the ONS³, the gender pay gap nationally based on median hourly earnings for full time employees was 7.9% in 2021.

	AUTHORITY MEDIAN HOURLY EARNINGS (March 2022)	CHANGE IN GAP FROM 2021/22	UK MEDIAN HOURLY FULL TIME EARNINGS (April 2021)
	£14.63	0%	£14.87
	£14.63	0%	£16.25

The ONS⁴ point out that interpreting UK median earnings data has been impacted by the pandemic, furlough and the fluctuation in hours worked.

DECLARED DISABILITY (all staff in post 31 March 2022)

Physical	1	8.6% of the total staff group declare a disability A disability may be defined as “A physical or mental impairment which has a substantial and long-term effect on the person’s ability to carry out normal day-to-day activities”
Progressive conditions e.g., MS, cancer	1	
Sensory	1	
Mental Health	3	
Learning Difficulties	0	
Other	1	

² The difference between the mean hourly rate of pay of male full-pay relevant employees and that of female full-pay relevant employees

³ The difference between the median hourly rate of pay of male full-pay relevant employees and that of female full-pay relevant employees

⁴ ONS data 2021: [Gender pay gap in the UK - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

⁵ [Employee earnings in the UK - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

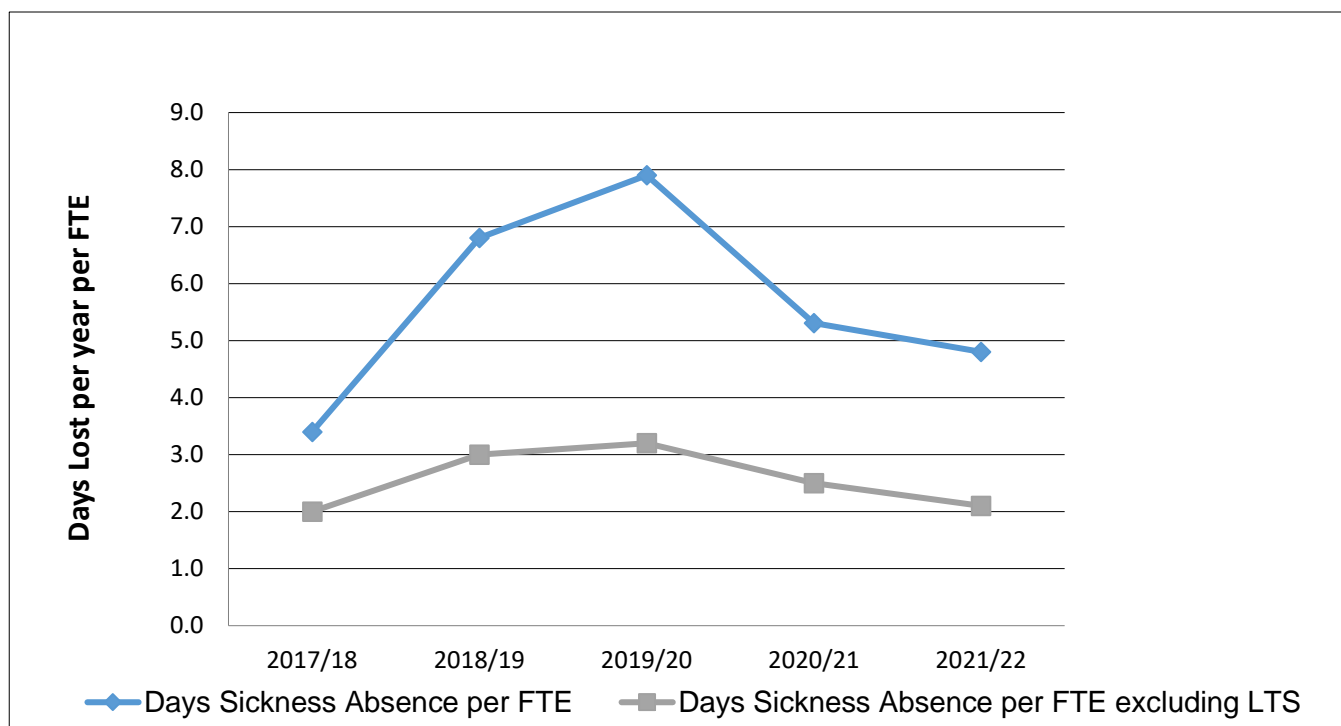
ETHNICITY (all staff in post 31 March 2022)

White	British	78	98% of employees identify themselves as white British 1% any other white background 1% prefer not to say
	Irish and wider European	0	
Any other white background		1	
Asian/Asian British		0	
Black/African/Caribbean/Black British		0	
Mixed/Multiple ethnic		0	
Other ethnic group		0	
Gypsy or Irish Traveller		0	
Mixed Ethnicity		0	

REPORTED ABSENCE DUE TO SICKNESS (all staff)

Year End March:	2021/22	2020/21	2019/20	2018/19	2017/18
Total Days lost through sickness absence	314	352	506	478	214
Total Days lost excluding LTS*	138	168	206	212	129
Total Days per FTE (Avg. FTE over year)	4.8	5.3	7.9	6.8	3.0
Total Days per FTE excluding LTS	2.1	2.5	3.2	3.0	1.8

*LTS=Long Term Sick (20 consecutive working days or over)



Sickness levels per full time equivalent have decreased this year but the number of occasions of sickness absence being reported has increased to 52 (compared to 43 in 2020/21). 51 staff members had no reported sickness absence during this period. This increase in recorded sickness absence is linked to the increase in coronavirus cases and where staff were not well enough to work at home. We are also seeing some of the longer-term effects of coronavirus and we are supporting staff in terms of regular discussions and flexible working.

This year the Authority recorded 16 absences relating to coronavirus, as opposed to 7 absences the year before. The Authority still has safe working practices in place in line with current government guidelines and we consider an employee's individual circumstances. Exmoor House is open, and staff are returning to the workplace. We are trialling blended working arrangements (until end of July) and the feedback from this will help inform a review of our current flexible working policies.

We continue to promote regular contact and communication between managers and staff. We have also developed our Physical and Mental Health and Wellbeing pages on the staff intranet which provides information, guidance and links to other organisations offering support. We will also be focussing on the menopause this year, raising awareness and understanding across the organisation and with managers.

REPORTED ACCIDENTS/INCIDENTS (all staff and volunteers)

During the period 1 April 2021 to 31 March 2022 there were:

- 3 staff accidents
- 3 public accidents (2 at Pinkery, 1 member of the public)
- There were no accidents/incidents reported from volunteers

Cause of injury

Slips, trips, and falls	3
Manual handling	1
Vehicle	1
Other (off ENPA premises)	1

Resulting Injury

Musculoskeletal	1
Bruise	2
Breaks	2
Vehicle damage	1

One RIDDOR report was submitted because of a fracture injury. Whilst we had 2 fractures this year, only one was reportable as the other was as a result of an accident that occurred in the road outside a National Park Centre and our staff provided first aid assistance.

All accidents and incidents, whether they result in injury or are considered a 'near-miss', are reported at the Authority's quarterly Health and Safety Committee and, where necessary, modifications to processes to prevent reoccurrence and to control risk are put in place.

Ellie Woodcock
HR Advisor
 17 May 2022

ENPA Customer Feedback Report 2021-22

A summary of the compliments, complaints, freedom of information requests and survey results for the period 1 April 2021 - 31 March 2022.

Customer Compliments

Below are a sample of the 76 written compliments received in 2021/22. We receive many more through the visitor books in National Park Centres, calls to our offices or in conversation with officers in the field. It is apparent that our staff take pride in the work they do and strive to offer good service.

I'm emailing just to say everything went really well yesterday thanks to you and it was great meeting the team, who are, as you described, very approachable and friendly so I really appreciated that. I hope all the other interviews went without mishap. **HR and Access and Recreation**

Just wanted to say how helpful and patient ICT has been at teaching me how to share my screen in Teams today. I am no way now an expert, but I do feel a lot more confident. So, thank you to ICT, much appreciated. **ICT**

I live in Withycombe and walk my dog regularly on Withycombe hill and in the deer park. I have noticed the new footpath signs that you have been putting up in the area and just wanted to say how attractive they are, from the lovely oak timber to the carved and painted directions. **Field Services Team and Access and Recreation**

Many thanks for your very professional approach to this application and your understanding and empathy for our position. I think you have demonstrated how planners and the planning system should work on Exmoor, including overcoming a couple of minor issues along the way and how the Local Plan has to be at the centre of any decision. I was very impressed how the Local Plan combines clear regulations and aspirations for Exmoor whilst also reflecting the history of Exmoor. This was very evident with regards to horse riding on Exmoor. **Planning and Planning Policy**

It was a fantastic day! I particularly enjoyed the walk and cave but found the whole day a brilliant and memorable experience. I found the information provided extremely useful. The only thing I can think of was that the end of the day was a bit more rushed. However, I think that was largely due to many of us being parents and having to leave!

My class (and my own children) enjoyed looking over the posters we were given! **Education**

In the meantime, I can report that our few days in Exmoor went off really well and we will return within the next few weeks. Thank you and all your team for the sterling work you do and I can assure you that us visitors appreciate your efforts. I only know too well what is involved, as I do my bit as a volunteer working with our local AONB unit in the Mendip Hills. **Facilities Ref Tarr Steps parking machine**

I hope that you will forgive me for writing out of the blue, but I have press-ganged into it by my three young children following our recent family holiday on Exmoor. Whilst it may not have delivered in weather terms, our 10 days in Somerset has certainly left an indelible mark on the family and, in particular, the children have developed a deep appreciation and better

understanding of the natural environment thanks to the efforts of the National Park Authority. A chance wander into the Exmoor Information Centre in Dunster village on Tuesday 3rd August really ignited their curiosity and fired their imaginations, not just through the excellent interpretation panels and free leaflets on display, but by the quality and dedication of your staff. The lady and gentleman in the Centre that day were an absolute credit to your organisation and were a wonderful double act in bringing the history and biodiversity of Exmoor to life. The children were enthralled and walked out clutching their 2021 Exmoor Visitor Guides, complete with a 8-part challenge to record, complete and return at the end of their holiday. A big thank you from all of us for providing the wherewithal for a family holiday which will live long in the memory, without the need for screens or PCs! We loved getting to know this beautiful part of the world whilst the kids had fun and learned so much at the same time. **National Park Centres**

Thank you so much for coming to talk to the Beaver Scouts this evening. I think your visit made them aware of the National Park and what it provides. Once we can get out & about I will remind them of your visit and I'm sure they will realise what a fabulous resource we have in our doorstep. Thank you once again for giving up your time. **Rangers**

Thank you once again for your generosity of time and for sharing with us the work you have done in Hawkcombe, an area which holds very special and particular memories for us as a family. **Wildlife and Conservation (Woodlands)**

I wanted to say an enormous thank you to the team who helped me on Saturday 26th June. I slipped on the rocks and damaged my wrist. The team gave me water and a sling and tried to ring a taxi as we'd walked in from Martinhoe. We're so very grateful for the kindness from both team members.. they made our tricky situation far less stressful and we really do appreciate everything they did. **National Park Centres**

Formal Customer Complaints

From time-to-time Officers deal with concerns and issues raised by members of the public but these are usually resolved at an informal stage without the need to invoke the formal complaints procedure. The Authority received 6 complaints regarding the provision of its services via the formal complaints procedure as follows:

Stage 1 and 2 Complaints received 2021-22		
Stage, Section and Reason for the Complaint	Date	Authority Response
Stage 2. Affordable Housing. Complaint of wording in the Sec 106 on local need devaluing and being restrictive to future sale of the property	April 2021	Complaint not upheld. Complainant asked for complaint to be reviewed by the Local Government and Social Care Ombudsman who did not investigate the complaint as the complainant had agreed to the original wording in the Section 106 and could apply to have this wording reviewed through the normal channels.

Stage 1. Planning and Planning Enforcement. Complaint of harassment by Planning Enforcement Officer.	May 2021	Complaint partially upheld. ENPA apologised for being unaware of discharge conditions.
Stage 1 and Stage 2. Access and Recreation. Access complaint and RoW staff being unhelpful	June 2021	Complaint not upheld. Complainant referred to LGSCO for any onward complaint relating to this complaint.
Stage 3 (from the old complaints process.) Economy. Continuation of complaint (11 months between Stages) of complaint of unfair competition by ENPA running Ranger Experience Days.	June 2021	Complaint not upheld. Complainant referred to LGSCO for any onward complaint relating to this complaint.
Stage 1. Planning Enforcement. Data Breach in Planning Enforcement.	Sept 2021	Complaint upheld. ENPA apologised and training was provided to the relevant staff member.
Stage 1. Planning. Lack of response to emails and inconsistencies in requests for ecological surveys	March 2022	Complaint not upheld. Admin processes had been followed correctly, and complainant informed that applications are treated on an individual basis.

Customer Surveys

It has not been possible to analyse customer survey information from Planning Applicants as the software we have used is no longer supported so no data has been received. Steps are being taken to update the system to enable information to be collected again in 2022/23.

Freedom of Information and Environmental Information Regulations Requests

The Authority received 47 requests for information using the Freedom of Information Act 2000/Environmental Information Regulations 2004.

FOI / EIR Requests 2021/22

Data/Information Requested	Authority Response
FOI – Volunteers	Information Not Held.
EIR – Phosphates	Information Disclosed.
FOI – Public Car Parks	Information Disclosed
FOI - Spend over £500 for Jan - Mar 2021	Section 21 Absolute Exemption applied - Information already available (on ENPA website)
EIR – Exmoor Ponies	Information Disclosed
FOI - Advice on Trail Run event	Information Disclosed
FOI - Cloud usage for IT	Information Disclosed
FOI - Telephony	Information Disclosed
FOI - Payments made to Stonewall	Information not held
FOI - Planning	Information Disclosed
EIR - GIS Data	Information Disclosed.
FOI – IT	Information Disclosed
FOI – Planning Enforcement	Information withheld. Absolute Exemption Sec 41(1) applied - Information provided in confidence
FOI - Planning - Lynton and Barnstaple Railway	Information disclosed with personal information redacted
FOI - Bullying Complaints	Information Not Held
FOI - Sexual Harassment Complaints	Information Not Held
FOI - Malware & Ransomware	Information Disclosed
FOI - Maverick Trail Run event	Information not disclosed FOI Exemption on Legal Professional Privilege used
FOI - Total Cost of Home Working Equipment	Information Disclosed
FOI - Amount of home working equipment that cost over £1000	Information Disclosed
FOI - how many data breaches under planning enforcement have occurred for the last 3 years?	Information Disclosed
FOI - Confidential Waste	Information Disclosed

FOI / EIR Requests 2021/22

Data/Information Requested	Authority Response
FOI - Dates of work on Dry stone wall at Ashcombe	Requestor has been asked to make an official request, which they have agreed to. Nothing received as of 11 October.
FOI - Printers	Information Disclosed
FOI - Dry Stone Wall Ashcombe	Information held disclosed. Some personal information withheld under GDPR regulations
EIR - Statutory Notices relating to Bay Point, Lynmouth	Information Disclosed
FOI - Correspondence	Information Disclosed
FOI - Malicious emails	Information Disclosed
EIR - Photos requested of property	Information Disclosed
FOI - Unspent S106 funds	Information Not Held
FOI - IT	Information Disclosed
EIR - Lynton and Barnstaple Railway	Information partially disclosed, some information held under EIR Exception 12 (4) e Internal Meetings
EIR - Farming in Protected Landscapes - Lamb Application	Information Disclosed
FOI - Spend on social media	Information Disclosed
FOI - Losses and Special Payments	Section 21 Absolute Exemption applied - Information already available (on ENPA website)
EIR - Amount of Trail Hunts licenced and held	Section 21 Absolute Exemption applied - Information already available (on ENPA website)
EIR - The number of by-law breaches in this National Park in the past 12 months -Annual funding from central Gov for 2021, and annual funding for 2012 -Number of animals killed and number of animals injured in the past 12 months -Would this National Park expect to use the greater range of enforcement powers proposed by government?	Information Disclosed
FOI - Fixed Penalty Notices	No information held. ENPA have no powers to issue Fixed Penalty Notices
FOI - names of people present at the Members Briefing on L&B Railway, and who the recording has been provided to.	Information Disclosed

FOI / EIR Requests 2021/22

Data/Information Requested	Authority Response
FOI - Funding of Charities	Information not held; no payments made to the charities listed.
EIR - Member voting on L&BR	Information not held EIR Exception 12 (4) (e) Internal Communications of public bodies
EIR - Are terriers used by The Exmoor Foxhounds	Information Disclosed
FOI - EV Strategy	Information Disclosed
FOI - Insurance	Information Disclosed
FOI - Information provided to Planning	Information Disclosed
EIR - Land Owned by ENPA	Information Disclosed
FOI - Gender Pay Gap	Information Disclosed

15.1



Committee Report

Application Number:	6/35/22/101
Registration Date:	11-Mar-2022
Determination Date:	20-Jun-2022
Applicant:	Mr M Weatherlake
Agent:	Mr. N Furze
Case Officer:	Tom Jones
Site Address:	Land adjoining B3224 at Treborough Common - Easting 300250: Northing 135050, Treborough, Watchet
Proposal:	Proposed storage of timber and wood chipping operation used in connection with the applicant's existing combined heat and power generating business on land form part of the parking area previously granted planning permission (6/35/08/101) for the nearby equestrian course. Resubmission of application 6/35/21/103. (Part retrospective).
Recommendation:	Refusal and service of an enforcement notice.
Reason for bringing before the Authority Committee:	This application is brought before Committee in accordance with the Approved Scheme of Delegation because the recommendation of the Officer is contrary to the recommendation of Brompton Regis Parish Council, which supports the application.

Relevant History

6/35/06/101 Change of Use of land to equestrian. Approved 03/07/2006

6/35/08/101 Retrospective application in respect of Change of Use of land to equestrian. Approved 05/20/2008

6/35/21/103 Proposed storage of timber and wood chipping operation to be used in conjunction Refused 01/20/2022

6/35/97/103 Proposed storage of stone - Retrospective Application, Treborough Common Refused 09/02/1997

Site Description & Proposal

Planning permission is sought to create an area within a larger field to store timber and to carry out occasional wood chipping in association with a combined heat and

15.1

power operation. The application seeks to regularise the situation where the land is being used without planning permission for this purpose.

The area that is the subject of the application lies immediately to the north of the B3224 highway that runs from Wheddon Cross, in the west, to the Brendon Hill Methodist Church, linking onwards to roads heading towards Brompton Regis.

The site is part of an elevated area of land within a wider landscape at Treborough Common.

The southern boundary comprises a substantial row of mature trees with the north, west and eastern boundaries being open farmland.

The land is approached from an existing access to the B3224 and sits immediately to the east of the track that runs in a north easterly direction from this access to the Combined Heat and Power (CHP) plant.

The application is a revised version of a previous application (ENPA reference 6/35/21/103) for the same use on the same site.

In the previous scheme the storage area was to be excavated to a depth of 300mm with the material used to form surrounding earth embankments. With this revised application no excavation works or embankments are proposed. Fencing would be installed to define the edge of the storage area with native planting providing a landscape screen.

The application area measures approximately 34m (east-west) by 18m (north-south)

A large wood chipping machine would be brought to site, typically every three to four weeks, positioned by the stored wood and used for in the order of 4 to 5 hours.

Consultee Representations

Brompton Regis Parish Council – supports, noting that ‘these developments can only make this established business more sustainable.’

Somerset County Council (Highway Authority) – On the basis the use is ancillary to the one granted consent against P/A 6/35/16/102, and would not result in an increase in traffic, advises that Standing Advice can be applied.

ENPA Landscape Officer - The revised proposal for a timber storage area is in the same location and the same size as the refused application (approximately 34 x 18m). The amendments include omission of the banks around the storage area and the pond. In place of the bank is a 1m high post and wire fence and hedgerow.

The amount of excavation and ground modelling required has therefore been substantially reduced, which represents a reduced impact on landscape features and landform. The proposal does remain at odds with the landscape character of the Eastern Enclosed Farmed Hill with Commons character area, which is open and expansive. One of the issues / forces for change identified for this character is the localised examples of prominent storage areas, including machinery and scrap. In this location, the farmland has become degraded with construction waste and

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materials stockpiled, shipping containers and abandoned machinery located on the open ridge.

As per my comments on the original application, the timber storage area would be seen in close proximity from the adjacent bridleway and footpath for a short distance before the landform drops away to the north from the broad back of the ridge. The trees on the roadside hedgebank would form a backdrop, so the storage area would not be visible on the skyline. These trees would also screen it from the road. The screening provided by this row of trees is dependent on them not being laid or coppiced in the way adjacent sections of hedgerow have been, as the storage area would be more visible in the landscape if they were, given its elevation. In longer views from the north and north east, the storage area would not be visible.

The planning statement puts forward a suggestion for an alternative planting scheme, wrapping native tree planting around the storage area, which on balance would be more effective as a screen than the proposed hedgerow and more appropriate to the landscape setting.

The revised proposal would cause less harm to the landscape than the original application, although it would still introduce a feature that is at odds with the open landscape of the common. The development in this location would still be isolated, away from any buildings or farmstead it is associated with.

ENPA Historic Environment Officer – comments that the revised proposal no longer includes the grading of the area and the creation of bunds or banks, meaning that there is less likelihood of below ground archaeological impact and does not advise further archaeological work. The Officer notes, however, that in historic landscape terms, this was once an open landscape, part of Treborough Common, and the creation of new small enclosures is not in keeping with the historic landscape - in conflict with policy SE-S3.

The Officer commented on the previous planning application (reference 6/35/21/103) and the comments apply to this application equally: 'Treborough Common has a rich history. With much of the Brendon Hills ridge, it appears to have been largely unenclosed until the second half of 19th century. Until that time it was an open moorland landscape with prehistoric burial mounds along the high ridge which was also crossed by the unenclosed Herepath or Harepath, a reputed Saxon routeway. Many of the parishes used this earlier landscape to mark their boundaries and the parish boundary runs along the southern side of the proposed development. In the later 19th-century the area was developed for iron mining and a railway was built to the south of the road. Abandoned in the early 20th century this relict landscape is now one of Exmoor's Principal Archaeological Landscapes (PAL 44: West Somerset Mineral Railway and associated mineworkings) which lies to the south of the proposed development. A period of late 19th century enclosure and short-lived cultivation appears to have gone out of use by the post-second world war period (ENP HER number MSO8352). One of these late field enclosures (now in the same modern field as the proposed development) was used to house a US military / army camp occupied for a short time during preparations for the D-Day landings in 1944. The northern end of the proposed development may impact on a rectangular block relating to the use of the camp. The proposed development with the creation of new banks would detract from the historic landscape and

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earthmoving may have an unassessed impact on remains of the military camp and earlier prehistoric landscape and field system.'

ENPA Public Rights of Way and Access Officer – commented on the previous planning application (reference) and the comments apply to this application equally. The Officer advises that 'Public footpath WL26/10 and public bridleway WL26/15 pass just to the west of the proposed development site and their existence has been clearly acknowledged in the application and on the plans. The public footpath is slightly 'offline' in that the legal line does not coincide with the line used on the ground. The public footpath also has permitted bridleway access with the kind permission of the owner – a permitted bridleway also leaves runs away from the site parallel to the road.

The proposed timber storage does not impact directly on either the legal or the used line of the public rights of way – the track is already used for private vehicular access and there is good visibility and wide verges so I do not consider that traffic associated with the proposed use will have an impact on users of the right of way. The timber will be visible to users of the public footpath / permitted bridleway but is only temporary in nature so I do not feel it will spoil people's enjoyment of the right of way.

Please ensure that during development and use of the site, the public right of way remains unobstructed and easy to use at all times.'

The new application seems to differ in that a planting scheme is provided. Whilst this is welcomed, I would just draw your attention to the definitive line of the public footpath which whilst not in use (see below), passes through the line of proposed beech trees to be planted. If the planting can leave enough space for this definitive line, then this will avoid making this 'offline' situation worse.'

No other consultee representations have been received.

Representations

No neighbour representations received.

Policy Context

Exmoor National Park Local Plan 2011 – 2031

GP1 – General Policy: Achieving National Park Purposes and Sustainable Development

GP3 – Spatial Strategy

CE-S1 – Landscape and Seascape Character

CE-D1 – Protecting Exmoor's Landscapes and Seascapes

CE-S2 – Protecting Exmoor's Dark Night Sky

CE-S4 – Cultural Heritage and Historic Environment

CE-D3 – Conserving Heritage Assets

CE-S6 – Design and Sustainable Construction Principles

SE-S1 – A Sustainable Exmoor Economy

SE-S3 – Business Development in The Open Countryside

RT-D12 – Access Land and Rights of Way

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AC-D2 – Traffic and Road Safety Considerations for Development
CC-S1 – Climate Change Mitigation and Adaptation
CC-S5 – Low Carbon and Renewable Energy Development

The National Planning Policy Framework (NPPF) is also a material planning consideration.

Planning Considerations

The main material planning considerations in this case are the principle of development, the design, scale and materials, and the impact on the landscape, neighbouring amenity and highway safety.

Principle of development

The key policies for making a judgement with respect to the acceptability of the proposed development at Policies GP1, GP3, CC-S5, SE-S1 and SE-S3.

Policy GP1 sets out criteria for achieving National Park Purposes and Sustainable Development. These include high quality design, the efficient use of land, buildings, services and infrastructure; protecting the amenities of local residents; conserving or enhancing the quiet enjoyment of the National Park; and supporting the health and socio-economic wellbeing of local communities.

Policy GP3 establishes the Spatial Strategy for Exmoor, with the key objective being to focus new development within named settlements.

Policy SE-S1 encourages development that would strengthen, enhance and diversify the Exmoor economy, business and employment. Proposals should demonstrate that 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.

Policy CC-S5 supports low carbon development where this contributes to energy supply, is compatible with the landscape, do not compromise the natural beauty, wildlife, cultural heritage or historic environment; and provide environmental enhancement.

The proposed development and activity entail the storage and processing of timber from outside the applicant's holding with the end product being woodchip for a CHP facility. The proposal is essentially an extension of the business site, approximately 1.15km to the north, where the combined heat and power building is located. It would be used ancillary to that site / activity. It is the view of the Planning Officer, therefore, that the application should be determine in the context of Policy SE-S3 of the Local Plan, which relates to business development in the open countryside; and not under the provisions of Policy SE-S4 (forestry) of the Local Plan.

In this respect it is noted that in a 1991 appeal decision in Wyre Forest, the sawing of logs was considered to fall outside what could be regarded as ancillary to forestry and in a 1991 appeal in Colchester, the fact that timber had been removed

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from the estate where it originated and then stored and sawn from a different planning unit was considered to be the crux of the argument that such a use was not ancillary to forestry.

Policy SE-S3 states that 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 Policy SE-S1 and where the scale and appearance of the development are compatible with local landscape character.

It is the view of the Planning Officer that the site is not well related to the applicant's building group where the combined heat and power facility is located or any other buildings group. It is not a farmstead or within a hamlet. The isolated location within the open countryside leads to a conflict in principle with Policy SE-S3, criterion 5, which states that '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.' The isolated location and harm to the landscape, natural beauty, and cultural heritage conflicts with Policy CC-S5.

The agent has emphasised the importance of the CHP plant to local energy supply, local employment and to the local economy. The supporting text to Policy SE-S3 makes no reference to exceptional circumstances where development might be permitted in an isolated location. It is the view of the Planning Officer that this might only be the case if the application is a matter of overriding national importance.

The agent notes that the National Planning Policy Framework (NPPF) at paragraph 85 states that 'planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.'

It is the view of the Planning Officer, however, that the provisions of the NPPF do not provide any policy reasons to over-ride the requirements of Policy SE-S3, criterion 5.

At a site visit on Wednesday 6th of April, the Planning Officer was invited by the agent to consider whether there would be a suitable site nearer to the business site. The Officer discussed this possibility with the agent. The agent explained that other sites have been explored and discounted, for various reasons, by the applicant. The agent advised that the applicant has confirmed that other fuel types for the combined heat and power system are now being considered following approval for the use of other fuel types. This means that there is now a need for an area for storing and processing timber.

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The Planning Officer considers that the availability of other sites for storage and processing wood is not a material consideration in making a judgement on the application that is the subject of this report. In the interests of clarity, however, it is noted that in the Officer Report for a previous application for the same use on this proposed site stated that 'Officers may be able to take a pragmatic decision on the latter if the storage area was adjoining the business site'. The Planning Officer writing this report holds the same view.

It is also noted that when considering planning applications for the CHP plant (ENPA references 6/35/17/101 [Retention of extension and other alterations on the combined heat and power plant building together with the proposed raising of roof on part of wood chip storage building (part retrospective)] and 6/35/16/102 [Proposed additional use of agricultural and forestry buildings together with land for the installation and operation of wood chip powered combined heat and power system] the issue of the possible need to store wood on site was not raised by the applicant and agent. Permission was granted with conditions that would control the noise associated with processing of materials.

It is acknowledged that the site would be used as part of a business use that provides energy to the public and regard has been given to a planning permission that was granted at Committee for a wood storage area near Allercott Farm. However, neither of these circumstances are considered to resolve the conflict with policy, particularly as the latter relates to another site in the National Park and each planning application should be judged on its individual merits.

The applicant has provided confidential financial information regarding the business. This demonstrates the financial investment the applicant has made and the benefits that arise to the local community from benefits such as employment. The benefits are acknowledged but are not considered to be such a scale that the recommendation can deviate from the requirements of the Local Plan. The investment that the applicant has made is also acknowledged, but it is the view of the Planning Officer that this is not a material consideration for this planning application.

The agent also advises that if this CHP business was not operating felled woodland timber would have to be transported out of the area, possibly Wales which increases mileage for heavy vehicles which is not good for the environment or sustainability. The benefits are acknowledged but are not considered to be such a scale that the recommendation can deviate from the requirements of the Local Plan.

The agent advises that the originally envisaged wood chipping operations have not taken place in nearby woodland areas where the trees are felled for a number of reasons including no local material being available and the impact that this has had on the distance to site for the transporting the wood chips and the associated machinery, space, adverse ground condition, proximity to noise sensitive buildings. Off site chipping is still carried out when a nearby source of material becomes available including when hedge laying operations are being carried out on local farms and the surplus trimmings / timber can be turned into wood chips rather than being burnt on the fields. These operational issues, advises the agent, have resulted in chipping material having to be sourced from further afield but as near

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as possible to his premises. Most of the timber used to power the CHP machines is delivered by log transporters to the applicant's land where it is chipped. The agent states that 'It was recognised towards the end of 2017 that the original practice of stockpiling large quantities of timber on this land could not continue because of the objections from the Exmoor National Park Authority.' This led to a 'Just in time' principle with smaller quantities of material being brought onto the land and machined as soon as possible about every 2-3 weeks. This practice has, on occasion, failed due to adverse weather conditions, machinery failure or miss communication with timber suppliers. This means that there are occasions when the timber is un-expectedly not available so there is a need to store a certain amount on site.

Having considered these points made by the agent it is the view of the Planning Officer that a key reason for the application is to eliminate the need for vehicles to travel on the farm track from the highway to the CHP plant and back. Whilst that might be more convenient and maybe reduce costs for the running of the plant, this does not outweigh the conflict with Policy SE-S3, which does not support isolated development. In the interests of clarity, there is no documented 'objection' to on site storage.

The Officer is of the view that the planning application cannot be supported due to the conflict with Policy SE-S3. In the interests of providing a clear and robust report to inform the decision, the following text addresses other material considerations. The key issues are impact on the landscape, impact on heritage; design, scale and materials; and impact on highway safety.

Impact on the landscape / design, scale and materials

Policy CE-S1, CE-S2 and CE-D1 seek to protect the high quality, diverse and distinct landscapes and seascapes; and to protect Exmoor's Dark Night Sky.

Policy CE-S3 and paragraphs 174 and 176 of the NPPF require that development conserves and enhances wildlife, habitats and sites of geological interest within the National Park. Harm to the landscape with the National Park is given great weight.

Policy CE-D1 advises that development will be permitted where it can be demonstrated that it is compatible with the conservation and enhancement of Exmoor's landscape. Policy CE-S2 refers to Exmoor's dark night sky and advises that, among other things, the tranquillity and dark sky experience of the Exmoor National Park Dark Sky Reserve and the National Park as a whole, will be maintained and improved.

Policy CE-S4 requires the local distinctiveness, cultural heritage, and historic environment of Exmoor National Park to be conserved and enhanced. Policy CE-D3, Clause 3 specifically seeks to protect Heritage Assets and their Settings.

Policy CE-S6 requires development proposals to deliver high quality sustainable designs that, amongst other matters, positively contribute to the setting, reinforce landscape character and the positive arrangement of landscape features, not

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detrimentally affect the amenities of surrounding properties or other adverse environmental impacts.

The edge of the storage area would be defined by timber post (split sweet chest) with wire fence. A native hedge would be planted to straddle the fencing and/or additional trees planted outside of the storage area.

The applicant proposes that within the storage area timber would be stored in two piles. One of these timber piles would be used to store timber up to a height of 3m for short term periods of up to 7 days prior to it being chipped and transported to the CHP site. Material being stored for any longer time would be limited to a height of 2.4m. The piles of short term and long-term storage will alternate from time to time but it envisaged that the higher height would generally be kept on the lower southern side of the site.

The Authority's Landscape Officer raised concern with respect to the creation of a bank along the track as proposed in the previous planning application.

The Officer notes that for this application the Planning Statement puts forward a suggestion for an alternative planting scheme, wrapping native tree planting around the storage area. The Officer considers that this would be more effective as a screen than the proposed hedgerow and more appropriate to the landscape setting.

The Officer concludes that although the revised proposal would cause less harm to the landscape than the original application, it would still introduce a feature that is at odds with the open landscape of the common; and that the development in this location would be isolated, away from any buildings or farmstead it is associated with.

In this respect and in the context of Policy CE-S4 and Policy CE-D3, the consultation comments of the Historic Environment Officer are relevant to the determination of this application. It is the view of the Planning Officer that the isolated setting at the edge of an historic landscape, formed by an open common, would be materially harmed by this proposed development, particularly in terms of the impact on landscape character.

The development would be seen from the nearby public rights of way and it would be viewed as isolated development that is not well related to an existing building group or settlement. This would result in material harm to the landscape character and, to a lesser extent, landscape appearance.

It is considered that the proposal to use wooden fencing and native tree planting to mitigate the landscape impact are generally in accordance with the objectives of Policy CE-S6, notably these are appropriate materials, and the development would not be overbearing in appearance. The development would not, however, reinforce landscape character and would result in some harm to the setting, in conflict with the Policy.

The agent has emphasised the importance to this proposal that an area measuring 30m x 50m is allocated for parking in association with equestrian permissions

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(6/35/06/101 and 6/35/08/101) co-incides with the area subject to this application. The Planning Officer notes that this land might from time to time be occupied by horse related vehicles, and most intensively when there is a cross country event. In this respect it is noted that in the Committee Report for application reference 6/35/08/101 the Planning Officer states that ‘... the applicant has advised that the allocated car parking area (as shown on the proposal plans) will not be covered with hardstanding, but instead remain as existing ... The retention of the existing grass area is considered to be preferable visually and, therefore, there are no objections to this proposal. The applicant is aware that should, at a later date, he wish to provide a hardened parking area, it would be necessary to submit a fresh planning application.’

Whilst parking use would have an impact on the landscape there are no permanent structures associated with this use. The potential impact of parked vehicles is considered to be limited.

Impact on Highway Safety and Public Rights of Way

The Highway Authority, Somerset County Council, have commented that on the basis the use of the application site is ancillary to the combined heat and power business site and would not result in an increase in traffic, standing advice can be referred to.

The access to the site is using an existing entrance. The visibility splays and access arrangements are considered to be sufficient to allow safe access from and egress on to the road without compromising highway safety. The development is therefore compliant with Policy AC-D2 of the Local Plan.

The ENPA Public Rights of Way and Access Officer advises that public footpath WL26/10 and public bridleway WL26/15, which passes just to the west of the proposed development would not be directly impacted. The Officer advises that, if permitted, planting would need to leave enough space for the definitive route. This could be addressed by a condition, meaning that the proposals would not be in conflict with Policy RT-D12.

Other matters

The proposed development would not be likely to harm biodiversity. The proposed planting, which could be secured by condition, would deliver biodiversity enhancement.

In May 2019 the UK government declared a climate emergency, with Exmoor National Park following this by declaring a Climate Emergency in October 2019. To help meet this challenge the Local plan includes policies which seek to influence, contribute and challenge development to help meet the Climate Emergency.

Policy GP1 ‘Achieving National Park Purposes and Sustainable Development’ Sets out that the need to consider future generations, through sustainability and resilience to climate change and adapting to and mitigating the impacts of climate change.

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Policy CC-S1, 'Climate Change Mitigation and Adaption'; and Policy CC-S5, 'Low Carbon and Renewable Energy Development' state that climate change mitigation will be encouraged and support small scale renewable energy schemes. Policy CE-S6 'Design and Sustainable Construction Principles' seeks to incorporate sustainable construction methods which future proof against climate change impacts, including flood risk.

Paragraph 152 of the National Planning Policy Framework requires that 'the planning system should support the transition to a low carbon future in a changing climate taking full account of flood risk and coastal change.'

In this respect the agent has also emphasised the relevance of the text of the NPPF at paragraphs 8c, 157 and 158. Paragraph 8c sets an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

Paragraphs 157 and 158 require local planning authorities to comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and approve the application if its impacts are (or can be made) acceptable.

It is recognised that the proposed development would support the running of an existing CHP plant. The benefits to the operation of the plant are not, however, considered to be such that the conflict with Local Plan Policy can be over-riden.

Human Rights

The provisions of the Human Rights Act 1998 and Equality Act 2010 have been taken into account in reaching the recommendation contained in this report.

Conclusion

The development would be seen from the nearby public right of way and it would be viewed as isolated development that is not well related to an existing building group or settlement. This would result in material harm to the landscape character and, to a lesser extent, landscape appearance. The main driver of Policy SE-S3 is to require development to be near to existing built form is to protect the landscape as well as to ensure sustainable development. As such, the matter of landscape is another reason it is contrary to that policy and is contrary to Policies CE-S1 and CE-D1.

It is recognised that the design, scale and materials of the proposed development and scope of activity are sensitive to the local environment, and it is concluded that there would not be material harm to neighbouring amenity or highway safety.

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The benefits to energy security and the local economy are also recognised.

However, the compliant aspects of the application and the benefits of the application are not considered to outweigh the in principle policy conflict and the landscape harm. In this respect it is noted that great weight is given to conserving and enhancing landscape and scenic beauty in National Parks, as required by Paragraph 176 of the National Planning Policy Framework.

The Planning Officer does not consider there to be material considerations that over-ride the conflict with Policies SE-S3 CE-S1 and CE-D1 of the Local Plan.

Recommendation

The planning application should be refused for the following reason:

1. The application site is not well related to the group of buildings that form the business site that this proposed development would be ancillary to. Policy SE-S3 of the Exmoor National Park Local Plan 2011 – 2031 requires extensions to business premises to be well related to an existing group of buildings. This proposed development would represent isolated development in the open countryside that is not well related to any existing building group. This isolated position, together with the incongruent form of the development on the edge of an agricultural field, not only conflicts with Policy SE-S3, but also results in material harm to the landscape character of the common and its historic value. The application is therefore contrary to Policies GP1, CE-S1, CE-D1, CE-S6, SE-S1 and SE-S3 of the Exmoor National Park Local Plan, and Paragraphs 174 and 176 of the National Planning Policy Framework.

and that an Enforcement Notice is served requiring the cessation of the use of the land within the application red line area for the storage of wood and the removal of wood and other materials not associated with the permitted equestrian use.

Informatives

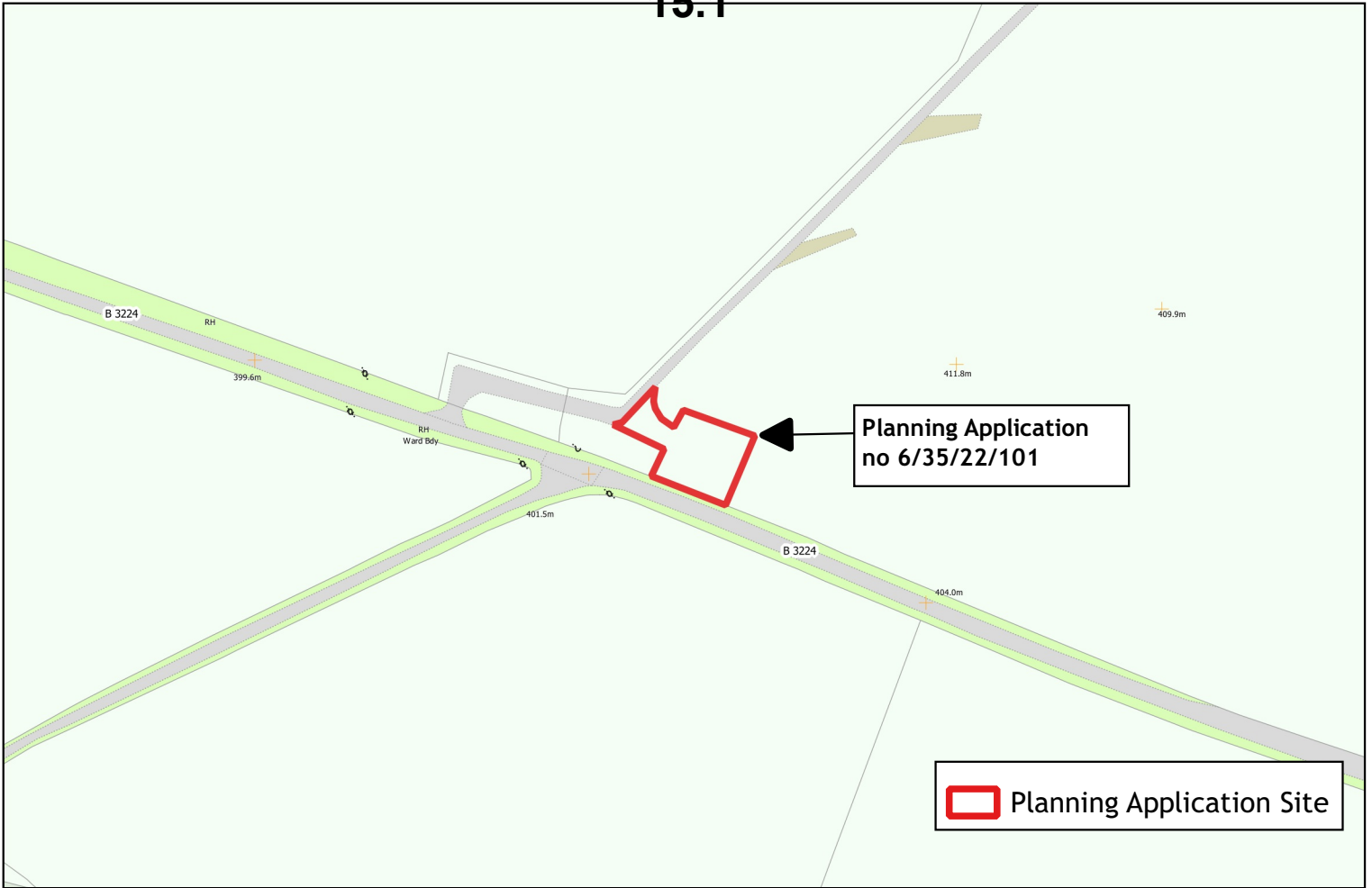
Positive and Proactive Statement

This Authority has a pro-active approach to the delivery of development. Early preapplication engagement is always encouraged. In accordance with the requirements of Article 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015, in determining this application, Exmoor National Park Authority has endeavoured to work positively and proactively with the agent/applicant, in line with the National Planning Policy Framework, to ensure that all relevant planning considerations have been appropriately addressed to achieve a positive outcome. In this case, the planning objections to the proposal could not be overcome.

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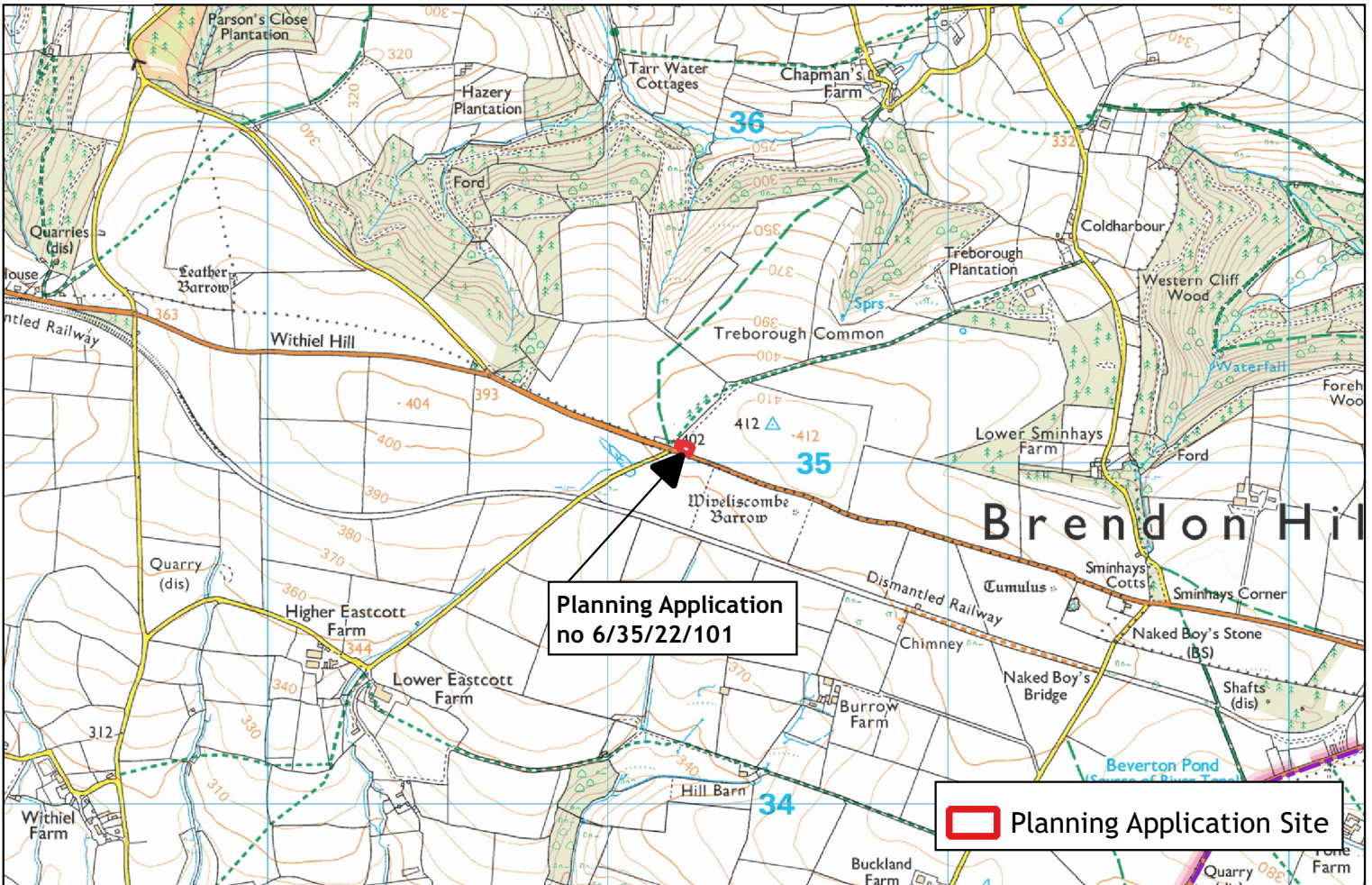
Appeal to the Secretary of State

If you want to appeal against the decision of the Local Planning Authority then you must do so within 6 months of the date of this notice.



Site Map
Scale 1:2,500

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Overview Map
Scale 1:20,000

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Committee Report

Application Number:	6/27/22/106
Registration Date:	25-Feb-2022
Determination Date:	14-Apr-2022
Applicant	Mr M Whitby-Grubb
Agent:	Mr. A Elston, Architectural Studio
Case Officer:	Tim Furmidge
Site Address:	WATERMILL COTTAGE, HAWKCOMBE, PORLOCK, MINEHEAD, TA24 8QW
Proposal:	Proposed erection of a 3m x 3m detached shed. Retrospective.
Recommendation:	Refusal
Reason for bringing before Authority Committee:	This application is brought before the Committee in accordance with the approved Scheme of Delegation because the Officer's recommendation to refuse is contrary to the recommendation of Porlock Parish Council.

Relevant History

6/27/01/120 - Certificate of Existing Lawful Use of land for more than 10 years as a residential curtilage (to Watermill Cottage), CAP 11/12/2001.

6/27/02/107 - Extension and part conversion of double garage to form 1 bedroomed apartment with garage, as additional information dated 02.04.02, and amended drawing 01A dated 17.04.02, CAP 07/05/2002.

ENF/0018/21 - Trees removed in conservation area and erection of a shed, this was investigated and resulted in this application being submitted for the existing shed.

Site Description & Proposal

Site Description

The application site lies on the western side of Mill Lane, just off its junction with Parsons Street, within Hawkcombe/Porlock. The dwelling on site consists of a single storey double garage and store, with a red brick frontage either side of the timber garage door and a pitched roof with double roman clay tiles. The site is also located within the designed Conservation Area of Porlock/Hawkcombe and within the Historic Settlement Core of Hawkcombe.

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Proposal

The already constructed shed, is located towards the end of the long and narrow garden curtilage of the property. The garden runs from north to the south, adjacent to a steep hill to the west and adjacent to the river to the east, which runs linear to Parsons Street and the site.

This application is retrospective, and the shed has been constructed in timber cladding under a felt tiled pitch roof. The shed measures 3m by 3m, with an eave's height of 2m and a ridge height of 2.5m. The walls are painted in a dark red/brown finish, the doors and windows are finished in white. The roof eaves are extended to the north to allow for a covered sitting area. There are half glazed French doors to the northern elevation and a single glazed window in the side eastern elevation. Further to this, there is a number of small trees and foliage has been cleared within this garden and on the riverbank, but no trees under protection or of note have been removed.

Consultee Representations

ENPA - Historic Building Officer - They have now visited site as the photographs as the application did not show the position of the shed in the context of its surroundings within the conservation area. Unfortunately, the shed is located in a very prominent position in the conservation area and is highly visible from road between Porlock and Hawkcombe. This is popular walking route through the area and the shed will be seen by anyone passing by. The streetscape in this part of the conservation area is characterised by a heavily vegetated river bank that rises to woodland beyond. While there are other garden structures in this area, in general these are well shielded from view and better related to other built forms. This shed is in an isolated and prominent position and has no shielding. This is exacerbated by its bright, two tone colour scheme which draws the eye. It is difficult to come to a view other than it causing harm to the character and appearance of the conservation area.

Local Plan Policy CE-D3, Conserving Heritage Assets, states that 'Development proposals affecting conservation areas should ensure that: a) the character or appearance of the area is preserved or enhanced; b) they deliver high quality design and incorporate materials that reflect the scale, architectural quality and detailing of the area' Policy CE-S4, Cultural Heritage and Historic Environment states, 'Where proposals are likely to cause substantial harm to or loss of locally important assets, permission will only be granted in exceptional circumstances where the public benefit outweighs the asset's historic or archaeological interest, having regard to the scale of any harm or loss and the significance of the heritage asset. 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 or enhanced.'

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This policy is supported by the National Planning Policy Framework (NPPF) that states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

I am of the view the shed causes a less than substantial harm to the conservation area and provides no public benefit that might outweigh the harm. It therefore fails to meet these policies.

Whilst adding shielding or changing the colour scheme will help lessen the impact of the shed, I am of the view it needs to be relocated to a more sheltered position where it would better relate to other built forms should the applicant wish to retain it.

ENPA - Wildlife Conservation Officer - I have reviewed the application documents and I understand that this is a retrospective application for a garden shed. Looking at the aerial photos the shed appears to have been constructed between 2020 and 2021. It is not clear what habitats were there prior to the construction of the shed though the photographs provided show the shed surrounded by garden shrubs.

The site lies directly adjacent to Hawkcombe LWS which is designated as a river with key species indicating high biological quality. Now that construction is complete, we can only consider future potential impacts on the LWS as a result of the shed and this is most likely to be as a result of spillage of chemicals such as cleaning materials, paint or fertiliser which are stored in the shed. It is therefore really important that the applicant is aware of this possibility and takes measures to avoid any potential spill or pollution incident.

I would like to see an enhancement for wildlife included in the proposal and suggest that at least one bird box is installed on the shed such as a small hole wooden bird box on the east elevation and that this is secured by way of condition.

Somerset County Council – Highways Authority - They have no observations to make regarding this application.

Porlock Parish Council - Cllr. Boden reported as the application is retrospective the structure is already in situ and is a half glazed double front doored large (3m square) wooden garden building. The structure is in the detached land strip belonging to Watermill Cottage land. It is visible to surrounding properties and from the roadway. ENPA does have polices covering garden and vernacular buildings, but the structure has already been constructed and in place for a while. I would therefore suggest we consent to the retrospective application but ask ENPA to confirm that there are no potential future development rights on this "shed".

Representations

Three representations have been received for this application, their comments are as follows:

1 x No objection;

1 x Support;

1 x Objection on the following grounds:

- Erected in conservation area without planning permission;
- Impact on visual amenity;
- No screening of shed has been carried out

Policy Context

EXMOOR NATIONAL PARK LOCAL PLAN 2011 – 2031:

GP1 Achieving National Park Purposes and Sustainable Development

CC-D1 – Flood Risk

CE-S3 - Biodiversity and Green Infrastructure

CE-S4 - Cultural Heritage and Historic Environment

CE-S6 - Design and Sustainable Construction Principles

CE-D3 - Conserving Heritage Assets

HC-D16 - Outbuildings

The National Planning Policy Framework (NPPF) is also a material planning consideration.

Planning Considerations

The main material planning considerations in this case are considered to be the principle of the development, the design, scale and materials of the development and its impact on the Porlock/Hawkcombe Conservation Area and neighbouring amenity.

Principle of Development

Policy HC-D16 of the Exmoor National Park Local Plan 2011 – 2031 states that proposals for ancillary outbuildings within the domestic curtilage of a dwelling will be permitted where:

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- 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 (Design and Sustainable Construction Principles);
 - 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 (Principles for the Conversion or Structural Alteration of Existing Buildings); and
 - d) private amenity space around the dwelling will not be reduced to an unacceptable level.

The shed has already been erected within the existing garden of Watermill Cottage. On the basis that the shed is used as domestic ancillary use to the dwelling, it is considered that the erection of this structure within the domestic curtilage is acceptable in principle, but this is subject to other material planning considerations being satisfied.

Design, Scale and Materials

The shed has been constructed in timber cladding under a green/grey felted tiled pitch roof. The shed measures 3m by 3m, with an eave's height of 2m and a ridge height of 2.5m. The walls are painted in a dark red/brown finish, the doors and windows are finished in white. The roof eaves are extended to the north to allow for a covered sitting area. There are half glazed French doors to the northern elevation and a single glazed window in the side eastern elevation. The shed is located within an establish domestic garden and is the type and size of building that normally would be located within a residential amenity space. This shed is constructed in timber and painted in dark red/brown with bright white windows and doors. Due to the distance from the host dwelling (45m), the structure does not have a significant visual impact to the host dwelling on site and does not have a detrimental effect on the amount of amenity space left within the garden plot.

Impact on Conservation Area

The application site is within the Porlock/Hawkcombe Conservation Area and Historic Settlement Core of Hawkcombe. There is a requirement under the Planning (Listed Buildings and Conservation Areas) Act 1990 that the Local Planning Authority should pay 'special attention to the desirability of preserving or enhancing the character or appearance of that area'.

Section 16 of the NPPF 2021 at Paragraph 203 states that 'The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be

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required having regard to the scale of any harm or loss and the significance of the heritage asset.'

Local Plan Policy CE-D3, Conserving Heritage Assets, states that 'Development proposals affecting conservation areas should ensure that: a) the character or appearance of the area is preserved or enhanced; b) they deliver high quality design and incorporate materials that reflect the scale, architectural quality and detailing of the area'. Policy CE-S4, Cultural Heritage and Historic Environment states, 'Where proposals are likely to cause substantial harm to or loss of locally important assets, permission will only be granted in exceptional circumstances where the public benefit outweighs the asset's historic or archaeological interest, having regard to the scale of any harm or loss and the significance of the heritage asset. 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 or enhanced.

The shed has been erected within the existing garden towards the southern boundary, near to the boundary of the lane to the east, and adjacent to a small river and riverbank, which has had much of the dense foliage/vegetation removed prior to this application. This means that it is prominent when travelling along the lane. This prominence, together with its two-tone painted finish and location, is considered to lead to development that impacts negatively on the character and appearance of this part of the Conservation Area. The Authority's Historic Buildings Officer has confirmed in his consultation response that he considers this to be the case. Overall, it is considered that the presence of this building on the site that it has been erected fails to preserve or enhance the character and appearance of the Hawkcombe Conservation Area.

Impact on Biodiversity

This application is retrospective, as the shed has been already constructed and is located towards the southern end of the garden, away from the host dwelling on site 'Watermill Cottage' and adjacent to a river and its deep banks. Further to this, there is a number of small trees and foliage has been cleared within this garden, but no trees under protection or of note has been removed.

Policy CE-S3 of the Local Plan relates to biodiversity and green infrastructure and states that the conservation and enhancement of wildlife, habitats, and sites of geological interest within the National Park will be given great weight. In the light of the comments received from the Wildlife Conservation Officer, they considered that although vegetation had been removed prior to the application, they had no objection to the structure, but commented that due to the adjacent river having high key species, which indicates high biological quality, measures should be taken by the applicant to ensure that any garden chemical/cleaners and fertilizers being stored in shed, should not spill over into this river. Further to this, they also recommended enhancement for wildlife, especially nesting boxes for birds. Therefore, it is

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considered that the proposal would not cause harm or have significant impact to wildlife and wildlife conservation.

Impact on Neighbouring Amenity

Policy HC-D16 also states that proposals for ancillary outbuildings will be supported where there is no unacceptable impact on the amenity of neighbouring occupiers. The building has not been erected close enough to a neighbouring property to cause harm to neighbouring amenity through overbearing or loss of light. The use of the building for domestic purposes means that there should not be an increase in noise or odour experienced by neighbouring occupiers.

Flood Risk

The shed is located within Flood Zone 1 and is adjacent to a stream. The shed is not for residential accommodation and has no electricity wired to the structure. The shed is minor in size and mass and is considered not to have a detrimental effect on any flood defences within this area and would be unlikely to increase the risk of flood waters to nearby residential dwellings and buildings. These considerations mean the proposal is not likely to have an unacceptable impact on flooding and flood risk, so complies with criteria 'b' and 'c' of Policy CC-D1.

Human Rights

The provisions of the Human Rights Act 1998 and Equality Act 2010 have been taken into account in reaching the recommendation contained in this report.

Conclusion

Whilst the erection of a domestic outbuilding at this property is acceptable in principle, the siting of it and its scale, form and finish have led to a development that is dominant within a street scene that forms part of a conservation area and provides the main vehicular access to the historic core of Hawkcombe. It is considered that the development detracts from the character and appearance of the Hawkcombe Conservation Area and fails to conserve or enhance the special qualities of this historic designated area. There is not considered to be public benefit from the development that would outweigh the level of harm that has been caused. Overall, it is considered that the development is contrary to Policies GP1, CE-S4, CE-D3, CE-S6 and HC-D16 of the Exmoor National Park Local Plan 2011 - 2031, and the National Planning Policy Framework and, therefore, it is recommended that the application is refused.

Recommendation

Refuse for the following reasons:

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1. The building by virtue of its siting, scale, form and materials is not considered to be an acceptable form of development as it detracts from the character and appearance of the Hawkcombe Conservation Area and fails to preserve the special qualities of this historic designated area within the National Park. It is, therefore, contrary to Policies GP1, CE-S4, CE-D3, CE-S6 and HC-D16 of the Exmoor National Park Local Plan 2011 - 2031, and the National Planning Policy Framework.

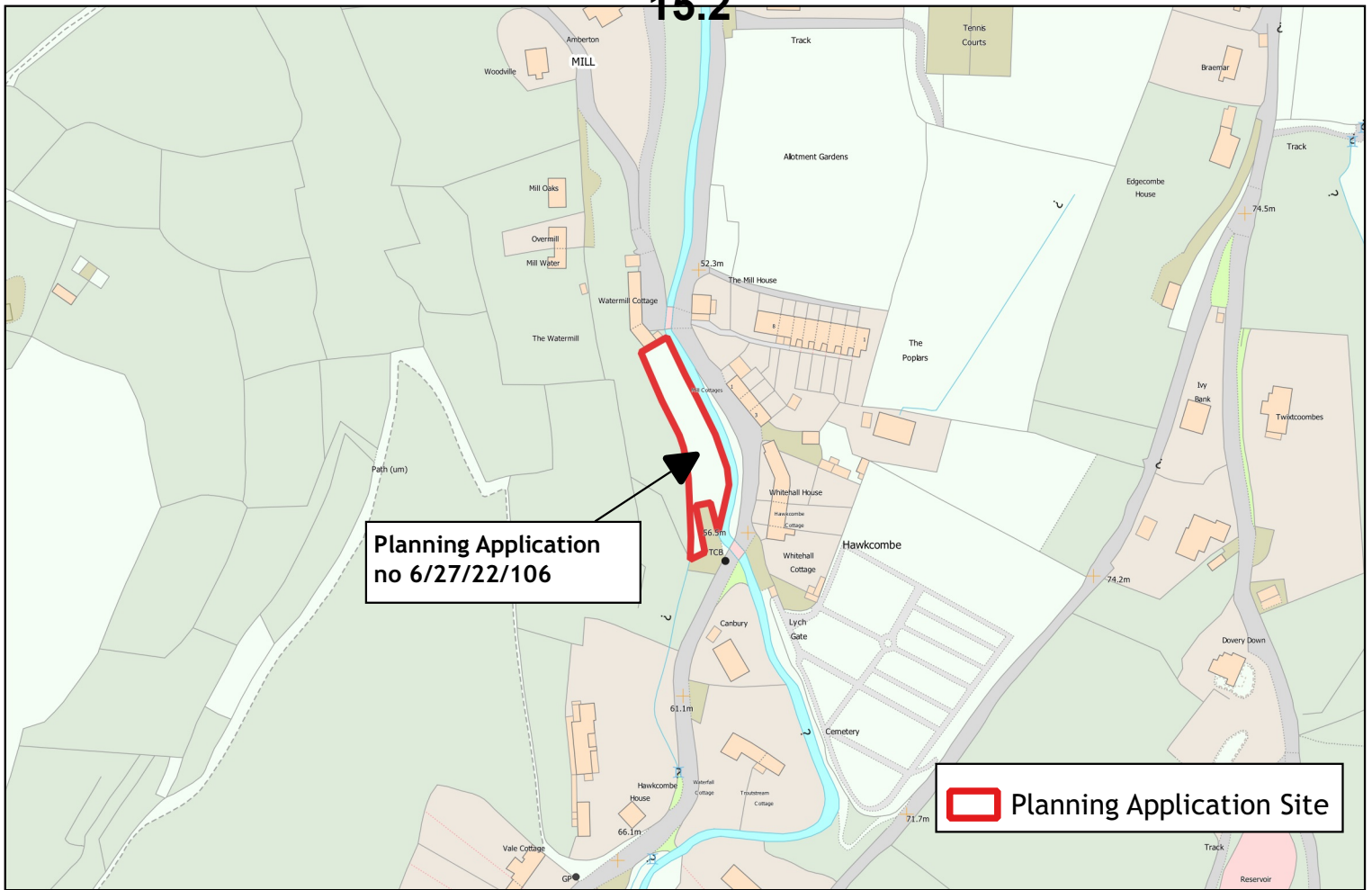
Informatives

Positive and Proactive

This Authority has a pro-active approach to the delivery of development. Early pre-application engagement is always encouraged. In accordance with the requirements of Article 35 of the Town and Country Planning (Development Management procedure) (England) Order 2015, in determining this application, Exmoor National Park Authority has endeavoured to work positively and proactively with the agent/applicant, in line with the National Planning Policy Framework, to ensure that all relevant planning considerations have been appropriately addressed to achieve a positive outcome. However, in this instance the relevant planning considerations have not been addressed and the application has therefore been refused.

Appeal

If you want to appeal against your Local Planning Authority's decision then you must do so within 6 months of the date of this notice.

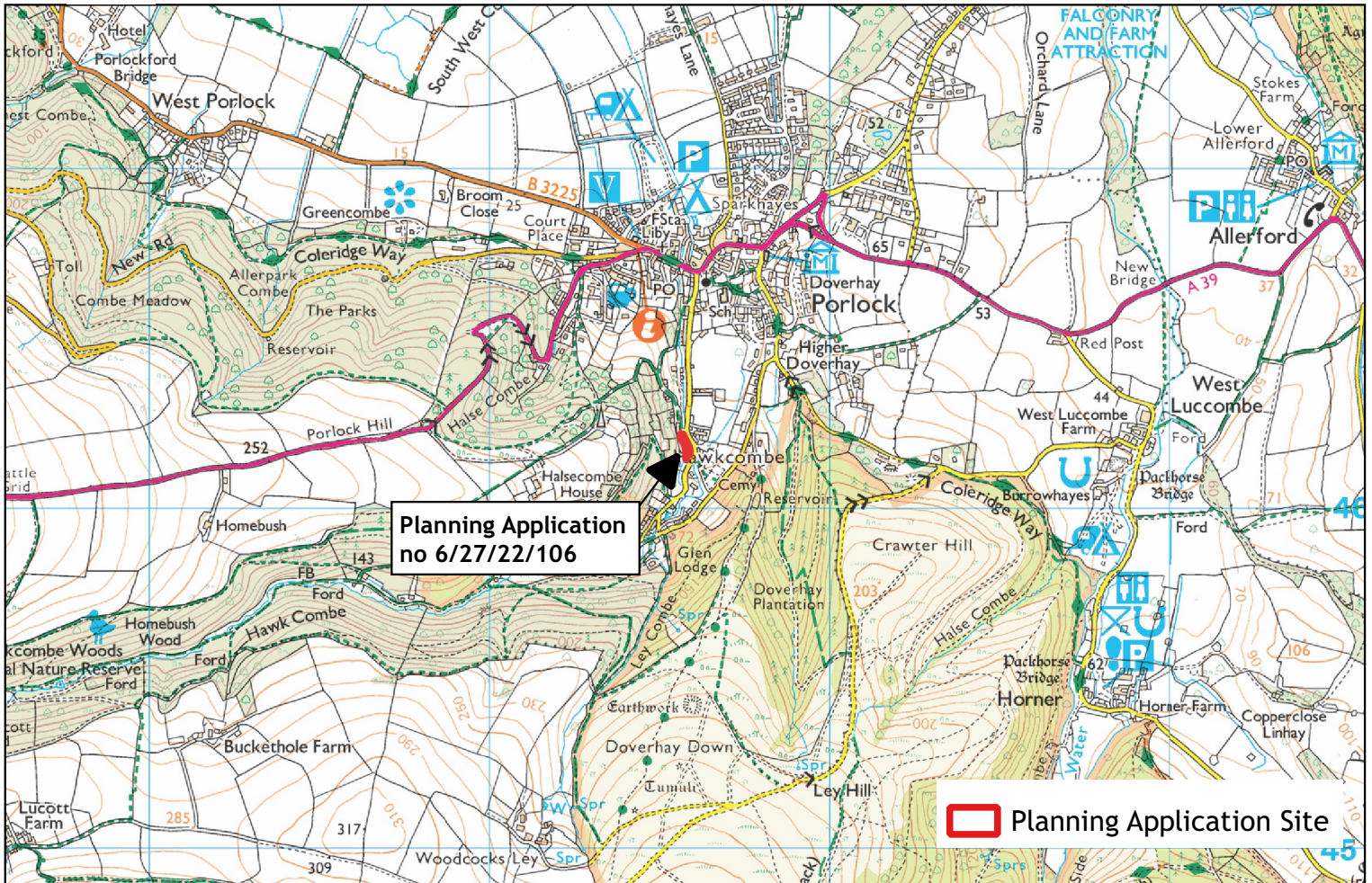


Planning Application no 6/27/22/106

Planning Application Site

Site Map
Scale 1:2,500

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Planning Application no 6/27/22/106

Planning Application Site

Overview Map
Scale 1:20,000

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Application Number:	6/40/22/102
Registration Date:	24-Jan-2022
Determination Date:	14-Mar-2022
Applicant:	Mr. D Barnett, Exmoor National Park Authority
Agent:	Mr. N Staddon, Staddons Architectural Services
Case Officer:	Tom Jones
Site Address:	River Barle (Easting 285773, Northing 133879), Below Great Bradley, Withypool, Minehead, Somerset
Proposal:	Application under Regulation 3 of The Town & Country Planning General Regulations 1992 for proposed construction of footbridge.
Recommendation:	Approval subject to conditions
Reason for bringing before the Authority Committee:	This application is brought before Committee in accordance with the Approved Scheme of Delegation because the applicant is the ENPA.

Relevant History

None

Site Description & Proposal

Exmoor National Park Authority has been granted, by the Environment Agency on 7th October 2020, an Environmental Permit to construct a new footbridge over the River Barle.

The proposed new footbridge would be installed at a ford below Great Bradley (National Grid Reference SS85727 33891), linking existing permitted footpaths in the area. Access to the bridge is via the public footpath from Winsford Hill, past Great Bradley. This would allow year-round use of the bridleway route and would allow more effective and efficient maintenance.

The bridge would measure 27.5m long and 2.2m wide. It would be constructed from steel, clad with oak; and have oak handrails. The bridge supports would be concrete, clad with local stone.

Consultee Representations

Environment Agency 24th January 2022 has made no comments. The Environment Agency has, however, granted an environmental permit. The permit confirms that, subject to conditions, the construction of the bridge would have acceptable impacts on the environment.

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Somerset County Council Highway Authority 24th January 2022, makes no observations.

Lead Local Flood Authority 24th January 2022, makes no comment.

ENPA Future Landscape Officer, 8th February 2022 advises that the proposed bridge is in a secluded location midway between Tarr Steps and Withypool in the steep sided wooded valley of the River Barle. The Officer considers that re-routing the footpath and Two Moors Way onto the bridleway on the opposite bank would reduce the wear and tear on the northern riverbank which is at times close to water level and prone to flood damage. The abutments have been positioned to minimise the impact of excavation and vegetation removal on the banks. The bridge design is similar to other larger footbridges within the National Park, with oak decking and handrails and with local stone walls either side of the approach ramps. The bridge will be glimpsed from the approach along the riverside, but visibility closes off within a short distance, particularly to the north. The bridge will not reduce people's experience of this attractive river valley and may enhance it through creating another opportunity to cross the river, given that the ford cannot be crossed on foot. It will also provide a safer route than the existing path, with fewer trouble spots that can be tricky to traverse. The closure of the permissive path will protect the vulnerable northern riverbank from further damage.

The Winsford Parish Council, 25th January 2022 – supports the application

The Withypool & Hawkrigde Parish Council, 10th March 2022, supports the application. The Councillors believe it is a good idea to have another crossing over the river which will allow walkers, mountain bikers and horses to cross safely. This proposal will ensure wildlife, their habitats and the landscape is conserved and safeguarded, whilst improving access for locals and visitors so that they may continue to enjoy the beauty and tranquillity of the area.

No other representations received.

Representations

No neighbour representations received.

Policy Context

Exmoor National Park Local Plan

GP1 – Achieving National Park Purposes and Sustainable Development
RT-D10 – Recreational Development
RT-S1 – Recreation and tourism
CE-S1 – Landscape and Seascape Character
CE-S2 – Protecting Exmoor's Dark Night sky
CE-D1 – Protecting Exmoor's Landscapes and Seascapes
CE-S3 – Biodiversity and Green Infrastructure
CE-S4 – Cultural Heritage and Historic Environment
CE-D3 – Conserving Heritage Assets

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CE-S6 – Design & Sustainable Construction Principles
CC-S1 – Climate Change Mitigation and Adaptation
CC-S6 – Waste Management
CC-D1 – Flood Risk
AC-S1 – Sustainable Transport
AC-D2 – Traffic and road safety considerations for development
RT-D12 – Access land and rights of way

The National Planning Policy Framework (NPPF) is a material planning consideration.

Planning Considerations

The main planning considerations are the principle of development, impact on Public Rights of Way, impact on the landscape, impact on biodiversity and impact on river flow / flood risk.

Principle of development

Policy GP1 sets out criteria for achieving National Park Purposes and Sustainable Development. Of relevance to this application these include high quality design, the efficient use of land, buildings, services and infrastructure; conserve or enhance the quiet enjoyment of the National Park; and supporting the health and socio-economic wellbeing of local communities and encouraging community participation.

Clause 1 of Policy RT-D10 allows recreational development where it supports a sustainable local economy and where it can be demonstrated that the criteria in the Policy can be met. Policy criteria require that the need is clearly demonstrated, and that siting, scale, and intensity of use or activity are appropriate in relation to the historic environment, wildlife sensitivity, landscape character, visual amenity and existing enjoyment of the area.

Clause 1 of Policy RT-S1 encourages high quality, inclusive visitor experience on Exmoor that actively enhance the understanding and enjoyment of the National Park's special qualities in accordance with the key principles, including the quiet enjoyment of the National Park; no unacceptable adverse effects on the natural and historic environment; the improved health and wellbeing of people living, working and visiting Exmoor through the benefits of recreation and experience of tranquillity; appropriate and safe access by the road network and where possible by walking, cycling, horse-riding and public transport; safeguard the existing access network, including public rights of way, and access land; and providing enhancements where opportunities arise.

The applicant advises that the valley between Withypool and Tarr steps offers a scenic and relatively easy walking route with good facilities at either end. It forms part of the Two Moors Way and has great potential from a tourism / visitor perspective.

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The proposed bridge would improve pedestrian access onto the public bridleway route on the other side of the river, which in turn will allow maintenance of the route and would facilitate the formal redirection of the Two Moors Way onto this route. Discussions with Natural England have taken place and NE support these measures in order that the access on the existing permitted route can be closed. Closing the existing access would allow improved management of the wildlife impact of people and dogs in the Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC). A further advantage would be that the bridge would provide quad bike access for the landowner, reducing the risk of pollution and riverbed disturbance caused by using the existing ford crossing.

Other options to divert the current permitted route have been explored, but no other option has been possible. The applicant considers that the proposed bridge and subsequent footpath diversion are considered to be the best approach to ensure long-term availability to the public.

It is the view of the Planning Officer that the need is established and the proposal is supported in principle by Policies RT-D10 and RT-S1 of the Local Plan.

Impact on landscape

Policy CE-S1, CE-S2 and CE-D1 seek to protect the high quality, diverse and distinct landscapes and seascapes.

Policy CE-D1 advises that development will be permitted where it can be demonstrated that it is compatible with the conservation and enhancement of Exmoor's landscape.

The submitted drawings illustrate the position, size and materials to be used and these are described earlier in this Report. The development would introduce a new structure at the location. The impact would extend on to the land with the external face of the supporting walls constructed from local stone, matched to the surrounding river stone. The proposals indicate that the installation of the bridge would require the ground level to be raised to form the ramps at each end.

Additional landscape impact would result from the coppicing of a small ash tree on the southern side of the river, and the large hazel clump adjacent being relocated downstream. These measures are proposed to maintain the local habitat and provide screening.

The Future Landscapes Officer considers that the abutments have been positioned to minimise the impact of excavation and vegetation removal on the banks. The bridge design is similar to other larger footbridges within the National Park, with oak decking and handrails and with local stone walls either side of the approach ramps. The Officer notes that the bridge would be glimpsed from the approach along the riverside, but visibility closes off within a short distance, particularly to the north. The bridge would not reduce people's experience of this attractive river valley and may enhance it through creating another opportunity to cross the river, given that the ford cannot be crossed on foot. The Officer also considers that the bridge would provide a safer route than the existing path, with fewer trouble spots

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that can be tricky to traverse; and that the closure of the permissive path would protect the vulnerable northern riverbank from further damage.

It is the view of the Planning Officer that the proposals would, subject to conditions being applied, have a limited impact on the character and appearance of the landscape, which would be conserved.

Design

Policy CE-S6 requires development proposals to deliver high quality sustainable designs that positively contribute to the setting; use materials and design elements that complement the local context; have regard to health and well-being; and have no other adverse environmental impacts.

The bridge is to be constructed from steel beams clad with locally sourced oak and local stone. The handrails, posts and decking would all be made of oak, mostly reused.

At the northern end a low wall with 'Cock and Hen Style' (rough-hewn stone which are placed at right angles on the top of stone walling to enhance weather resistance) coping stones would retain the built-up material forming the ramp to access the bridge. The walls would be constructed on new concrete abutment, stonework cladding extend down the outer sides of the northern abutments to hide the concrete. At the southern end a ramp would be formed by regrading local material against a mass concrete base, the main abutment would not be easily visible.

It is the view of the Planning Officer that the design is appropriate to the setting. A very similar design with clad oak has been used successfully to replace Woodside bridge at Lynmouth.

Impact on ecology

Policy CE-S3 requires development to conserve and enhance wildlife, habitats and sites of geological interest within the National Park will be given great weight. The River Barle is notified as a Site of Special Scientific Interest (SSSI). The land to either side, which will be impacted by the proposed works lies within both the Barle Valley SSSI and the Exmoor and Quantock Oakwoods Special Area of Conservation (SAC).

It is noted that consent for the construction has been obtained from the Environment Agency following consultation with Natural England. Through that process ENPA has carried out extensive negotiation with the Environment Agency and Natural England to develop the design for the proposed structure. ENPA also commissioned an assessment of environmental impacts and developed detailed construction method statements to satisfy these consultees.

The conditions of the Environment agency Licence include a written management system that, amongst other elements, identifies and minimises risks of environmental harm so far as is reasonably practicable, including those risks arising from operations, maintenance, accidents, incidents, non-conformances and

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those drawn to the attention of the operator as a result of complaints; and using sufficient competent persons and resources.

It is also noted that the closure of the existing permitted route would help in the management of the wildlife impact of people and dogs within the Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC); and that the bridge will provide quad access for the landowner thereby reducing risk of pollution and riverbed disturbance on the existing ford crossing.

Nevertheless, it is the responsibility of the ENPA to undertake a Habitats Regulations Assessment of the proposed development. This was conducted by the applicant in April 2022 and a report submitted to ENPA on 10th May 2022. This has been reviewed by the ENPA Wildlife Officer.

The HRA reports that the main features of interest likely to suffer negative impacts (albeit slight) as a result of this proposal are the epiphytic lichens associated with trees on the north bank of the river that may need to be managed as part of this scheme; the riparian habitat and its associated important species (including Atlantic Salmon and freshwater invertebrates), which may be negatively impacted by sedimentation; and otter, which may suffer some disruption to its normal activity due to disturbance. To address potential minor negative impacts, the following measures are proposed:

- tree management minimised around site of proposed footbridge. Pollarding and branch removal preferred to felling. No management of or disturbance to and Alder tree;
- in-river works avoided if possible;
- disturbance resulting in sedimentation is minimised;
- all works to be carried out between 31 March and 1 October;
- possibility of use as Dipper nest site built into design of footbridge; and
- remove exotic montbretia growing along the south bank by either digging out plants and their corms or spraying with herbicide.

These mitigation and enhancement measures are illustrated on revised plans and elevations.

It is considered that the recommendations of the HRA will complement the measures required by the Environment Agency licence, which – if adhered to – would result in harm to biodiversity.

It is noted that the site is close to Ancient woodland, but there would be no harm due to the site being sufficiently far enough from the woodland.

Site access and materials storage will be carried out according to the details of the Construction Method Statement agreed as part of the process of approving the Environment Agency Licence.

Officers consider it is appropriate to draw all the avoidance, mitigation and enhancement proposals into one coherent Environmental Management Plan.

Flood Risk

The bridge has been designed in consultation with the Environment Agency. The Environment Agency is satisfied that, if carried out in accordance with the conditions and details of the permit, there would be no increase in flood risk and no risk to harming land drainage or the environment. In the interests of ensuring no harm to the water environment and no risk to increasing flood risk at the site or elsewhere it is appropriate that the details and management conditions would be a condition of granting planning permission. This includes adherence to the written management system. ENPA also commissioned an assessment of environmental impacts and developed detailed construction method statements to satisfy these consultees

It is considered that through meeting the measures required by the Environment Agency licence the requirements of Policy CC-D1 are met. To ensure that the development is acceptable in planning terms It is considered appropriate to include these measures as a condition of granting planning permission.

Impact on the highway and Public Rights of Way

Policy RT-D12 relates to safeguarding access land and Rights of Way in terms of their condition, users' interests and character and appearance. Where a proposal would adversely affect the network it will be necessary to meet a number of criteria including that there is a need for the development, that there is no appropriate alternative location and any harm will be kept to a minimum.

The need for the bridge and its benefits are established earlier in this report. During construction the potential exists for interference with use of the footpaths. Measures would be necessary to ensure the safety of users. This is not specifically a planning policy matter, but if planning permission were granted the applicant would need to be made aware of the formal process required to incorporate measures to ensure safety including temporary diversion or closure of any footpath.

It is considered that the proposed development is in accordance with the objectives and requirements of Policy AC-S1 and Policy AC-D2.

Other matters

In May 2019 the UK government declared a climate emergency, Exmoor National Park followed this by declaring a Climate Emergency in October 2019. To help meet this challenge the Local plan includes policies which seek to influence, contribute and challenge development to help meet the Climate Emergency. Policy GP1 of the Local Plan sets out that the need to consider future generations, through sustainability and resilience to climate change and adapting to and mitigating the impacts of climate change. Policy CC-S1 states that climate change mitigation will be encouraged, development which reduces demand for energy, using small scale low carbon and renewable energy, looks to situate development which avoids sites that would put wildlife at risk together with measures which avoids the risk of flooding. Policy CE-S6 seeks to incorporate sustainable

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construction methods which future proof against climate change impacts, including flood risk.

Paragraph 152 of the National Planning Policy Framework prescribes that the planning system should support the transition to a low carbon future in a changing climate taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

There would be an impact on the climate from the construction process and the sourcing of construction materials.

In this respect it is noted that the materials would be provided by Devon County Council Highways; and would reuse a bridge that was used temporarily in 2018 as part of a major road scheme. Using a refurbished bridge has constrained the design options, but represents a sustainable approach

The timber will be sourced from sustainably managed local woodland, The bridge has been previously used, by recycling the bridge rather than using a new one, a more sustainable approach has been achieved, and its the carbon footprint will be less than using new bridge.

It is considered that the re-use of materials and the agreement of a management plan and construction method statement ensure that appropriate measures have been incorporated into the proposed development and its construction. The development would be in accordance with Policies CE-S6 Design & Sustainable Construction Principles; CC-S1 Climate Change Mitigation and Adaptation; and CC-S6 Waste Management.

Human Rights

The provisions of the Human Rights Act 1998 and Equality Act 2010 have been taken into account in reaching the recommendation contained in this report.

Conclusion

For the reasons set out in this report and subject to appropriate conditions being included officers consider that the application is compliant with the relevant policies set out in the Local Plan and therefore the recommendation is one a approval.

Recommendation

Planning permission be granted subject to the following conditions:

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: In accordance with the provisions of Section 91 of the Town and Country Planning Act 1990, (as amended by the Planning & Compulsory

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Purchase Act 2004).

2. The works hereby approved shall not be carried out except in complete accordance with drawing references SAS I 99/02G Proposed Plans and Sections (ENPA date stamped 13th May 2022, File No.9); and SAS I 99/03G Proposed Elevations (ENPA date stamped 13th May 2022, File No.10).

Reason: For the avoidance of doubt and to ensure the works accord with the approved details.

3. Prior to commencement of development a detailed Environmental Management Plan shall be submitted to and approved in writing by the local Planning Authority. The Plan will be in accordance with the Construction Method Statement hereby approved and the activities shall be operated using the techniques and in the manner described in the documentation specified in Schedule 1, Table S1.2, of the Environment Agency Licence documentation; and in accordance with the avoidance and mitigations measure identified through the Habitats Regulations Assessment. The Plan will include:

- no works are to take place between the 1st of October and 31 May;
- the operator shall manage and operate the activities in accordance with a written management system that identifies and minimises risks of flooding, impact on drainage and environmental harm so far as is reasonably practicable, including those risks arising from operations, maintenance, accidents, incidents, non-conformances and those drawn to the attention of the operator as a result of complaints;
- the operator shall use sufficient competent persons and resources;
- all liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container;
- measures shall be taken to ensure that the activities do not cause the spread of invasive non-native species or plant or animal diseases;
- tree management is minimised around site of proposed footbridge with pollarding and branch removal preferred to felling;
- no management of or disturbance to the Alder tree;
- in-river works avoided if possible;
- disturbance resulting in sedimentation is minimised;
- remove exotic montbretia growing along the south bank by either digging out plants and their corms or spraying with herbicide; and
- a copy of the Construction Method Statement and Environmental Management Plan will be kept at the site at all times

Once approved works shall be carried out in strict accordance with the approved details unless previously agreed in writing by the Local Planning Authority.

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Reason: In the interests of the strict protection of European protected species and in accordance with Local Plan policy CE-S3 and the NPPF.

4. The development hereby approved shall be carried out in strict accordance with the flood avoidance measures detailed in the Construction Method Statement Plan that constitutes part of the Environment Agency Licence unless otherwise agreed in writing by the ENPA.

Reason: to reduce the risk of flooding downstream in accordance with ENPA Local Plan and the NPPF.

Informatives

Positive and Proactive Statement

This Authority has a pro-active approach to the delivery of development. Early pre-application engagement is always encouraged. In accordance with the requirements of Article 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015, in determining this application, Exmoor National Park Authority has endeavoured to work positively and proactively with the agent/applicant, in line with the National Planning Policy Framework, to ensure that all relevant planning considerations have been appropriately addressed to achieve a positive outcome.

Monitoring of Development

The applicant/developer is reminded that it is their responsibility to ensure that the requirements of each planning condition are met and that the works are undertaken in accordance with the approved plans. Any failure to meet the terms of a planning condition or work which does not accord with the approved plans leaves the applicant/developer liable to formal action being taken. The National Park Authority endeavours to monitor on site the compliance with conditions and building works. This has benefits for applicants and developers as well as the National Park. To assist with this monitoring of development the applicant / developer is requested to give at least fourteen days notice of the commencement of development to ensure that effective monitoring can be undertaken. The Planning Section can be contacted at Exmoor National Park Authority, Exmoor House, Dulverton, Somerset, TA22 9HL or by telephone on 01398 323665 or by email plan@exmoor-nationalpark.gov.uk.

Conditions and Informatives and the Submission of Further Details

Please check all the conditions and informatives attached to this Decision Notice. If there are any conditions which require submission of details and/or samples prior to work commencing on site it is vital that these are submitted and agreed in writing by the Local Planning Authority before work starts. Given the High Court's interpretation of the Planning Acts and their lawful implementation it is unlikely that the Local Planning Authority will be able to agree to a sample/details after the commencement of works if that sample/details should have been approved prior to commencement. If a sample/detail is not agreed as required prior to

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commencement and works have started then it is likely that this matter may only be able to be rectified by the submission of another application. To avoid delay, inconvenience and the need to submit a further application, please ensure that all appropriate details/samples are submitted and agreed at the specified time.

Please also note that due to other decisions of the High Court it is now not normally possible for the Local Planning Authority to agree to minor amendments to approved applications on an informal basis.

The Department of Communities and Local Government have introduced a process whereby it is now possible to apply for a non-material amendment to a permission. This can deal with changes to plans which do not fundamentally alter the form of permission but are a variation to the approval. The appropriate form is available by request at Exmoor House or by downloading from the National Park Authority web site. Applications can be made via the Planning Portal.

Please ensure that works comply with the approved plans so as to avoid the possibility that works are unauthorised and liable for enforcement action.

Environment Agency

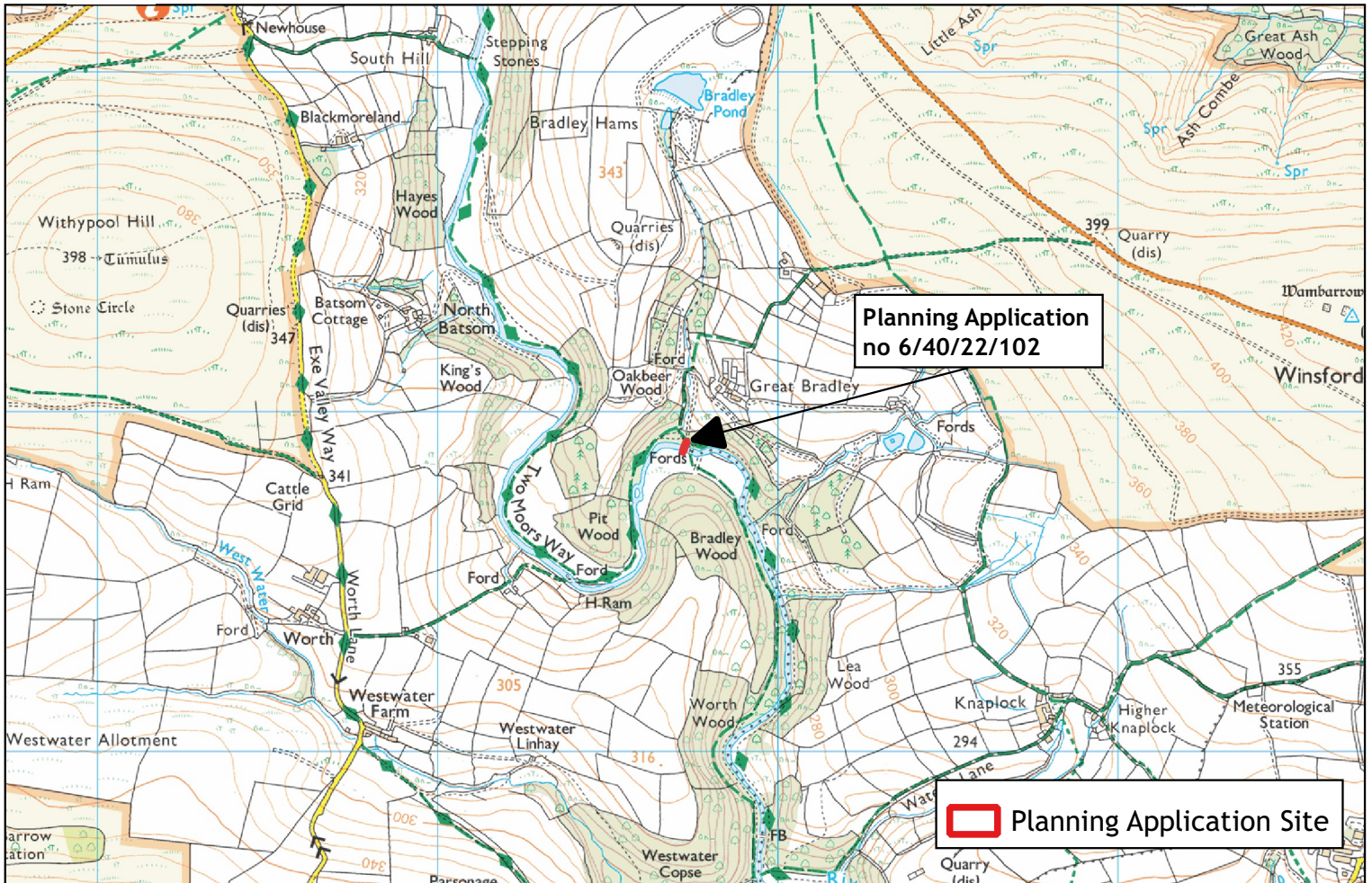
In accordance with the Environment Agency Permit remedial measures will be required should the monitoring find signs of erosion/lateral river movement that indicate that the bridge is compromising the naturalness of the river and its banks. Any such measures should be agreed and approved by the Environment Agency and Natural England prior to their implementation. This is to protect and promote the natural river ecosystem function of the River Barle Site of Special Scientific Interest.

The Environment Agency Fisheries, Biodiversity and Geomorphology team may be contacted via email at SWEXETERFRB@environment-agency.gov.uk.



Site Map
Scale 1:2,500

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Overview Map
Scale 1:20,000

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Application decisions delegated to the Chief Executive

Ref and Grid Ref	Applicant & Location	Decision and Date
GDO 22/07	Mr J Mugleston - Prior notification for the erection of agricultural shed for livestock and bale storage (18.28m x 12.19m). (GDO - Agricultural/Forestry) - Corner of field to north of access (Easting – 270024, Northing – 138619)	Prior Approval Required 23-May-2022
GDO 22/06	Mr S Brooking, Stuart Brooking BSc - Prior notification for the proposed erection of storage building (6.5m x 4.6m). (GDO - Agricultural/Forestry) - Land at Truffle Wood, Heale, Parracombe, Devon, (Easting: 264398, Northing 146664)	Prior Approval Required 23-May-2022
6/40/22/108DC	Mr M Down - Discharge of condition 5 (stone sample) of approved application 6/40/21/112. (Discharge of Condition) - EAST GLEBE, WINSFORD, MINEHEAD, TA24 7JF	Approved 25-Apr-2022
WTCA 22/08	Michael Butcher - Works to Trees in Conservation Area: Reduction of two poplars. (WTCA) - MANOR HOUSE, LUCCOMBE, MINEHEAD, TA24 8TE	Approved 09-May-2022
6/34/22/103	Mr A Berry - Proposed extension to existing community room (Full) - THE OLD DAIRY, WANNEROO FARM, TIMBERSCOMBE, MINEHEAD, TA24 7TU	Approved with Conditions 19-May-2022
6/43/22/107DC	D and A Preston and Bamford - Discharge of Conditions 3 (Lighting), 6 (Stone & Timber Samples), 7 (Planting Specs) and 9 (Plant Species Details) of application 6/43/21/104. (Discharge of Condition) - RIDGEWOOD COTTAGE, WOOTTON COURTENAY, MINEHEAD, TA24 8RF	Approved 19-May-2022
6/29/22/102LB	Mr. D Raymond, National Trust - Proposed installation of secondary glazing. (Listed Building Consent) - LOWER HOUSE FARM, BOSSINGTON, MINEHEAD, TA24 8HF	Approved with Conditions 28-Apr-2022
6/10/22/106LB	Spencer Osborne - Listed Building Consent for proposed first floor garden room extension to existing flat using part of existing balcony area. (Listed Building Consent) - 2, WEST STREET, DUNSTER, MINEHEAD, TA24 6SN	Approved with Conditions 10-May-2022

Application decisions delegated to the Chief Executive

Ref and Grid Ref	Applicant & Location	Decision and Date
6/10/22/105	Spencer Osborne - Proposed first floor garden room extension to existing flat using part of existing balcony area. (Householder) - 2, WEST STREET, DUNSTER, MINEHEAD, TA24 6SN	Approved with Conditions 10-May-2022
6/10/22/104LB	Ms. O Shirley, Bateman Hosegood - Listed building consent for the removal of internal lobby and associated works. (Listed Building Consent) - CASTLE COFFEE HOUSE, 4, HIGH STREET, DUNSTER, MINEHEAD, TA24 6SG	Approved with Conditions 18-May-2022
62/11/22/004	Mr N Webber - Lawful development certificate for the existing use of part of previous workshop as domestic garage and store, and use of land as domestic garden. (CLEUD) - Combe Lawn Cottage, Road From Ash Gate To Leeford Green, Brendon, EX35 6PS	Refused 09-May-2022
6/27/22/108LB	Mrs Connor - Listed building consent for the proposed replacement of 1no timber purlin and 1no timber window casement within outbuilding. (Listed Building Consent) - SHIP INN, PORLOCK, MINEHEAD, TA24 8QD	Approved with Conditions 28-Apr-2022
62/41/22/021	Mr & Mrs Storer - Proposed variation of Condition 2 of approved application 62/41/21/032 to incorporate a pitched roof over the proposed extension (Alteration/Lift Condition) - 3, CROSS STREET, LYNTON, EX35 6HG	Approved with Conditions 27-Apr-2022
WTPO 22/01	Mr S Sheasby - Work to trees subject to Tree Preservation Order: G2, Group of Irish Yew forming boundary hedge. Reduction of entire group to 3m to maintain healthy formal boundary. This work forms part of a large replanting initiative to fill historic gaps in hedgerow and create a double thickness hedge. (WTPO) - Doverhay Place, Minehead Road, Luccombe, Somerset, TA24 8HU	Approved 27-Apr-2022
6/26/22/102	Mrs G Bowyer - Proposed replacement of 11no timber windows and 2no French doors with uPVC, together with, the replacement of front door with composite door. (Householder) - 11, WATERSMEET CLOSE, ROADWATER, WATCHET, TA23 0QT	Approved with Conditions 27-Apr-2022

Application decisions delegated to the Chief Executive

Ref and Grid Ref	Applicant & Location	Decision and Date
6/43/22/103	Mr. Tony Andrews - Proposed extension to existing barn for the storage of hay and straw. (Full) - Land At Wootton Courtenay (Easting 293137, Northing 143684), Wootton, Minehead, Ta24 8rp	Approved with Conditions 25-Apr-2022
6/27/22/105	Mrs S Mclaughlin - Proposed erection of garage. (Householder) - 21, PARKS VIEW, PORLOCK, MINEHEAD, TA24 8NG	Approved with Conditions 21-Apr-2022
6/43/22/102	Mr & Mrs P & C Storey & Mr & Mrs Walker-Blair - Proposed change of use of agricultural land to site two alternative camping accommodation units for holiday use; demolition of stables and construction of replacement building to accommodate stables, and two toilet and shower rooms; and associated works. (Full) - APPLIEDORE, HUNTSCOTT, WOOTTON COURTENAY, MINEHEAD, TA24 8RR	Approved with Conditions 09-May-2022
62/41/22/009	Mr & Mrs G Shaw - Addition of balcony and canopy roof to the North Elevation. (Householder) - 21, WATERSMEET ROAD, LYNMOUTH, EX35 6EP	Refused 06-May-2022
6/25/22/101	Mr. G Smith, National Trust - Advertisement consent for the proposed erection of 4 no. signs. (Advert) - CLOUD FARM CAMPING, OARE, LYNTON, EX35 6NU	Approved with Conditions 28-Apr-2022
62/13/22/001	Mrs D Potter - Proposed variation of Condition 2 of approved application 62/13/17/006 to regularise extension of barn. (Alteration/Lift Condition) - MILL FARM, CHALLACOMBE, BARNSTAPLE, EX31 4TW	Approved with Conditions 06-May-2022
6/19/22/101	Mr N Westcott - Proposed change of use of field for seasonal camping with mobile welfare facilities. (Full) - HOLT BALL FARM, LUCCOMBE, MINEHEAD, TA24 8SZ	Withdrawn 21-Apr-2022
6/13/22/101	Westcott - Proposed conversion of agricultural building to form 1 no. holiday let, together with change of use of land to form garden and parking area. (amended plans) (Full) - West Ley Farm, Exford, Minehead, TA24 7NQ	Approved with Conditions 13-May-2022
6/8/22/102LB	Fiona Cranswick - Listed Building Consent for the proposed erection of single storey extension and dormer window along with internal and external	Approved with Conditions 16-May-2022

Application decisions delegated to the Chief Executive

Ref and Grid Ref	Applicant & Location	Decision and Date
	alterations. (Listed Building Consent) - NORTH WHEDDON FARM, WHEDDON CROSS, MINEHEAD, TA24 7EX	
6/8/22/101	Ms F Cranswick - Proposed erection of single storey extension and dormer window along with internal and external alterations. (Householder) - NORTH WHEDDON FARM, WHEDDON CROSS, MINEHEAD, TA24 7EX	Approved with Conditions 16-May-2022