

Draft Local Plan

November 2013



EXPLANATORY NOTE

STRATEGIC AND DEVELOPMENT MANAGEMENT POLICIES

Please note that this draft Local Plan contains both strategic and more detailed development management policies. The plan (together with any neighbourhood plans) will be the sole development plan for the area.

This is a change from the adopted Local Plan currently in force which only contains detailed policies, as it was prepared when there was also a separate Joint Structure Plan for Somerset and the whole of Exmoor National Park. The Joint Structure Plan set out the strategic policies. Together they were the development plan for the National Park. Changes to national legislation mean that Structure Plans (and the regional plans, or regional spatial strategies, that were to replace them) have now been abolished.

In this draft Local Plan the strategic policies set out the overarching approach to development in the National Park while the development management policies contain more detailed criteria to guide planning decisions. They are arranged section by section with each section having a different two letter code e.g. 'CC' for climate change. Each policy has a separate number. This starts with the code denoting the section it can be found in, followed by 'S1' 'S2' and so on for strategic policies and 'D1' 'D2' and so on for development management policies. The 'General Policies' (GP) in Section 4 are strategic policies and apply to all development proposals.

Comments and representations are invited on this document and any other relevant planning matters or omissions. An interactive version of the Draft Local Plan can be found on our website www.exmoor-nationalpark.gov.uk where you can make your representation online, or a representation form will be available to download (or we can send you a printed copy).

Please send your response to:

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Please ensure your response arrives by Friday 13th December at the latest.

Access to information:

If you would like this document in large print, other formats or another language, please contact us. We will do our best to help.

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LOCAL PLAN POLICY STRUCTURE

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1. INTRODUCTION

- 1.1 This is the draft Local Plan for Exmoor National Park. This introduction sets out and explains:
- a) the National Park context;
 - b) national guidance;
 - c) role of the Local Plan;
 - d) preparation of this Local Plan;
 - e) implementation and monitoring; and
 - f) how to use this Plan.

NATIONAL PARK CONTEXT

- 1.2 Exmoor is one of 15 National Parks in the United Kingdom and one of only four in southern Britain. Designated for their natural beauty and for the opportunities they offer for open air recreation, National Parks contain some of the most spectacular scenery in Britain, where it is possible to experience open space, peace, wildness and tranquillity.
- 1.3 Exmoor National Park is an asset of national, regional and local importance and provides a unique landscape of moorland, woodland, valleys, farmland and a spectacular coast. The National Park has a variety of habitats which support a great diversity of wildlife species many of which are rare and has many settlements, sites and features of rich cultural interest. Exmoor's landscapes also provide a wide range of benefits or 'ecosystem services' for wider society as a whole and hosts around 2 million visitor days each year.
- 1.4 Exmoor is also a living, working landscape - a home and workplace for nearly 10,300 people. The spatial strategy must therefore address the local need for affordable housing, provide opportunities for the diversification of Exmoor's economy and maintain a range of local services and facilities.
- 1.5 This Local Plan sets out a vision, objectives/strategic priorities and policies to guide development to achieve the National Park's statutory purposes and, in so doing, to further the wellbeing of Exmoor's communities. A spatial strategy directs development to the most sustainable locations, and, in doing so, helps to conserve and enhance the National Park and its special qualities as well as to achieve sustainable local communities and a thriving Exmoor economy for the period to 2030. Everyone can contribute to this Local Plan and may be affected by it. It is therefore important that a wide a range of people and organisations get involved in its preparation.

NATIONAL PARK PURPOSES AND DUTY

- 1.6 National Parks have two statutory purposes, as defined in the Environment Act 1995¹: primary legislation underpinning National Park designation:
- To conserve and enhance the natural beauty, wildlife and cultural heritage of the area;
 - To promote opportunities for the understanding and enjoyment of its special qualities by the public.
- 1.7 In pursuing these purposes Section 62 of the Act² places a duty on National Park Authorities to seek to foster the economic and social well-being of local communities within their National Park and shall, for that purpose, co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the area of the National Park.
- 1.8 Section 62 of the Act also places a general duty on all relevant authorities, including the National Park Authorities, statutory undertakers and other public bodies, to have regard to these purposes³. Where there is an irreconcilable conflict between the statutory purposes, the

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

² National Parks and Access to the Countryside Act 1949 Section 11A as inserted by Section 62 of the Environment Act 1995

³ *ibid*

Sandford Principle will be applied and the conservation of the National Park will be given priority.

- 1.9 The 2012 Localism Act brought in a duty for public bodies to co-operate on strategic cross-boundary issues in the preparation of Local Plans. Underpinning National Park designation and Local Plan preparation then is a requirement that National Park authorities and public bodies, including local authorities, work together. The National Park Authority has long-standing experience of working in partnership with other authorities and organisations to ensure that regard is had to National Park purposes and in delivering the duty to local communities because the National Park Authority is not the housing authority (the role of district councils) and does not have responsibility for economic development (district and county councils).

NATIONAL GUIDANCE

NATIONAL PLANNING POLICY FRAMEWORK

- 1.10 The government published its National Planning Policy Framework (NPPF) in March 2012⁴. It sets out the Government's planning policies for England relevant to the work of all planning authorities. It constitutes guidance for local planning authorities and decision-takers both in drawing up plans and as a material consideration in determining applications. The development plan remains the starting point for determining planning applications and planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.
- 1.11 The NPPF sets out a presumption in favour of "sustainable development". It states that for plan-making, Local Plans should meet objectively assessed needs unless specific policies in this Framework indicate development should be restricted⁵. Footnote 9 to this paragraph of the NPPF provides examples including Special Areas of Conservation, Sites of Special Scientific Interest and National Parks. The NPPF makes clear that "Great weight should be given to conserving landscape and scenic beauty in National Parks ..., which have the highest status of protection in relation to landscape and scenic beauty⁶. It refers to the National Parks and the Broads Vision and Circular as it provides further guidance and information on National Parks.
- 1.12 The NPPF states that Local Plans should set out the strategic priorities for the area. This should include strategic policies to deliver the homes and jobs needed in the area and conservation and enhancement of the environment, including landscape⁷. Plans should be based on co-operation with neighbouring authorities and public bodies on planning issues that cross administrative boundaries particularly those which relate to the strategic priorities. This is to ensure that they are co-ordinated and reflected in individual Local Plans to meet development requirements which cannot wholly be met within their own areas because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of the Framework⁸.

THE NATIONAL PARKS AND THE BROADS VISION AND CIRCULAR

- 1.13 The National Park Circular provides policy guidance specifically for the English National Parks for all those whose decisions or actions might affect them including, amongst others, government departments, government agencies, local authorities and other public bodies. The Circular includes a vision and sets out key outcomes:
- a) a renewed focus on achieving Park Purposes;
 - b) leading the way in adapting to, and mitigating climate change;
 - c) a diverse and healthy natural environment, enhanced cultural heritage and inspiring lifelong behaviour change towards sustainable living and enjoyment of the countryside;

⁴ National Planning Policy Framework (NPPF), DCLG 2012

⁵ *ibid* Para. 14

⁶ *ibid* Para. 115

⁷ *ibid* Para. 156

⁸ *ibid* Paras. 157, 178 and 179

- d) fostering and maintaining vibrant, healthy and productive living and working communities; and
- e) working in partnership to maximise the benefits delivered.

1.14 The NPPF, National Parks Circular and other relevant national guidance have been taken into account in the preparation of this Local Plan which is judged to be consistent with it.

ROLE OF THE LOCAL PLAN

- 1.15 The Exmoor National Park Authority, as the Planning Authority for the area, has a statutory duty to prepare, monitor and review a Local Plan for the area within Exmoor National Park. The Local Plan, along with Neighbourhood Plans, form the statutory development plan for Exmoor National Park. This Local Plan excludes those parts of West Somerset and North Devon outside the Exmoor National Park which are covered by separate Local Plans prepared by the District Councils.
- 1.16 In guiding planning decisions on Exmoor, the Local Plan is a vital component in maintaining the character of the National Park and fostering the social and economic well being of Exmoor's communities. It seeks to ensure effective services and a coherent approach for the National Park and the surrounding area across administrative boundaries.
- 1.17 This plan sets out a vision and objectives/strategic priorities for the National Park-for the lifetime of the Plan 2011-2031. In so doing it links to the Management Plan for Exmoor National Park (the Partnership Plan⁹) which sets out Exmoor's special qualities, the long term vision, objectives and priorities to be achieved on Exmoor 2012 to 2017 and provides a framework for integrating the various activities of the National Park Authority and for stimulating and co-ordinating action by other agencies. The Partnership Plan vision and objectives are shared with the Local Plan. The vision contains additional detail for the purposes of the Local Plan and, together with the objectives/strategic priorities, is set out in section 4.

PREPARATION OF THIS LOCAL PLAN

- 1.18 This draft Local Plan has benefited from early and extensive consultation with communities and stakeholders as well as being based on available and commissioned evidence. It has been prepared as a pre-publication document. Consultation to date has involved:
- 1.19 **Stakeholder Workshops** in Dunster and Lynton together with a meeting in Dulverton were held between December 2008 and January 2009 to scope key issues and options for the then Core Strategy & Development Management Policies DPD. Topic papers on economy and employment, housing, climate change, waste management and pollution, historic and built environment, and minerals, landscape, wildlife and land management, settlements, services, transport and recreation and tourism were prepared to inform the workshops. An LDF stakeholder consultation report was prepared and made available.
- 1.20 **'Your Future Exmoor' Consultation Events** comprised 13 school and college workshops were carried out from July 2009 to February 2010. These involved all the primary and First schools, and Dulverton Middle School, within the National Park and three schools and colleges in Minehead, Barnstaple and Ilfracombe. 21 'Your Future Exmoor' (YFE) community events were held between January and March 2010 in every settlement in the National Park to seek views on issues and options and a YFE event for stakeholder organisations was held in May 2010. Feedback reports were produced reflecting the findings from each event as well as a combined summary report. These events and workshops were attended by nearly 1,000 people. A further 4 detailed topic group meetings were held during November 2010 to discuss: recreation, tourism, climate change and housing.
- 1.21 Additionally, a **'Your Future Exmoor' Visitor Survey** was conducted during part of 2009 and 2010. A report was produced based on the findings from this survey.
- 1.22 A **'Your Future Exmoor' Residents Survey** for local residents was undertaken through the National Park Authority's Parklife community newspaper which is delivered to every household

⁹ Exmoor National Park Partnership Plan 2012-2017

within the National Park. It provided an additional opportunity for local people to give their views, particularly if they were unable to attend one of the community events.

- 1.23 During the period November 2011 to January 2012 a '**Your Future Exmoor**' Consultation was held in parallel with the Partnership Plan for Exmoor. The following aspects of the Local Plan were consulted on:
- i. **The draft Vision, Objectives and three General Policies.** The views received have been considered and Section 4 of this plan reflects those amendments made
 - ii. **Local Plan Options** (location of new development and delivery of affordable housing)
 - iii. The **Sustainability Appraisal, Sustainability Appraisal Non-Technical Summary and Habitats Regulations Assessment** were also part of the consultation

EVIDENCE AND OPTIONS

- 1.24 A number of options were considered during preparation of the Plan. Consideration of all reasonable options has resulted in the policies set out in this document. The other options that were considered are set out in Scope for Alternative Options and can be viewed on the National Park Authority website.
- 1.25 The Local Plan needs to be supported by robust evidence. Exmoor National Park has updated the majority of the required evidence base and the policies in the Local Plan reflect this evidence. There is however outstanding evidence that will be finalised to inform the publication Local Plan. This includes a Gypsy and Traveller Assessment and the Open Space Strategy.

SUSTAINABILITY APPRAISAL (INCLUDING STRATEGIC ENVIRONMENTAL ASSESSMENT) AND HABITATS REGULATIONS ASSESSMENT

- 1.26 A Sustainability Appraisal was conducted for the issues and options presented at the 'Your Future Exmoor' Consultations. The policies set out in the Draft Local Plan have been tested against a set of sustainability objectives to assess the implications of each policy against a number of environmental, economic and social indicators¹⁰. An assessment of the impacts on internationally important wildlife sites has also been carried out (as required under the Habitats Regulations)¹¹.
- 1.27 Recommended changes from the Sustainability Appraisal and Habitat Regulations Assessment have been incorporated in the Plan. You can view these appraisals online at the Exmoor National Park Authority's website. Please contact the National Park offices for a printed copy if you are not able to view the document online.

IMPLEMENTATION AND MONITORING

- 1.28 The Local Plan will be monitored through the Annual Monitoring Report in order to establish whether the policies are achieving their intended objectives and whether there are unexpected trends or changed circumstances that may necessitate a review. Indicators against which the policies will be monitored will be set out in the Publication draft of the Local Plan.

HOW TO USE THIS PLAN

- 1.29 This Plan reflects changes to national planning policy which has resulted in the move from preparing a suite of documents as part of a Local Development Framework to a single document approach as presented in this Local Plan. The Local Plan (together with any neighbourhood plans) is now the sole development plan for the area. As such, it contains both strategic planning policies, which take forward the vision and objectives/strategic priorities and sets out the overarching approach to development in the National Park, and development management policies which, consistent with the strategic policies, provide more detailed criteria to guide planning decisions and to deliver the vision and objectives for the National

¹⁰ Sustainability Appraisal Report Exmoor National Park Draft Local Plan Including Minerals and Waste Policies – Clare Reid Consultancy October 2013

¹¹ Exmoor National Park Local Plan Habitats Regulations Assessment – Somerset County Council October 2013

Park. The Plan also contains a Proposals Map. Whilst this Local Plan is subject to consultation, the previously saved policies of the Exmoor National Park Local Plan remain in force.

- 1.30 The policies within this Local Plan constitute an overall approach to future development in the National Park and it is important that the Plan is read as a whole. A practical consequence of this is that several policies may apply to one proposal. Cross referencing of policies is used where it is particularly important to clarify the relationship between areas of policy. Links between other policies are generally not identified because it is impossible to pre-empt all potential combinations of policy that might apply to a particular type of development. The General Policies apply to all proposals within Exmoor National Park. In addition, some proposals may require an Environmental Impact Assessment. The National Park Authority encourages early discussions on proposals before submission of a planning application. These can initially be discussed with Planning officers on the phone, by making an appointment at the National Park Authority offices in Dulverton or at one of the weekly planning surgeries in Porlock or Lynton.
- 1.31 The Plan is available for consultation which runs from 4th November to 13th December 2013. Comments must be made in writing, include contact details, and be received by **Friday 13th December**. You are encouraged to provide your comments online at www.exmoor-nationalpark.gov.uk
- 1.32 After consultation responses are received they will be considered and amended as appropriate. The next stages of plan preparation are as follows:
- Evidence Preparation
 - Consultation Period (Draft Local Plan): THIS STAGE
 - Consideration of Consultation Responses and Finalising Evidence
 - Consultation Period (Publication Version of the Local Plan)
 - Submission Preparation
 - Submission to Secretary of State
 - Examination in Public
 - Inspector's Report:
 - Adoption
- 1.33 Thank you for taking the time to respond to this consultation. This is an important stage and a chance for you to give us your views on the Draft Local Plan that will shape development in the National Park to 2030.

Please note that Section 2 Vision and Strategic Priorities and Objectives and Section 4 General Policies will show text that has been ~~struck through~~ (deletion) and text in *italics and underlined* (addition). This highlights the changes made to these specific sections following consultation on the Vision, Objectives and General Policies during November 2011 to January 2012.

2. VISION, STRATEGIC PRIORITIES AND OBJECTIVES

- 2.1. The Partnership (Management) Plan for Exmoor National Park 2007-12 2012-2017 sets out a clear vision for the National Park and its communities. This vision It includes and builds on has been retained and developed the Partnership Plan vision and is based on the vision set out in the National Parks and the Broads Circular 2010 and its key bullets are set out in the National Park Authority's Partnership Plan and enhanced here in the Local Plan to provide a comprehensive vision for the lifetime of this Local Plan. Every part of the vision set out below relates to the outcomes that are sought for Exmoor by 2030.
- 2.2. The National Park Circular 2010 states that the National Park Authorities' primary responsibility is to deliver their statutory purposes and in doing so, that they should ensure they are exemplars in achieving sustainable development, helping rural communities in particular to thrive. The Circular sets out a joint vision to 2030 including that: By 2030 English National Parks and the Broads will be places where 'there are thriving, living, working landscapes notable for their natural beauty and cultural heritage. They inspire visitors and local communities to live within environmental limits and to tackle climate change. The wide range of services they provide (from clean water to sustainable food) are in good condition and valued by society. Sustainable development can be seen in action. The communities of the Parks take an active part in decisions about their future. They are known for having been pivotal in the transformation to a low carbon society and sustainable living. Renewable energy, sustainable agriculture, low carbon transport and travel and healthy, prosperous communities have long been the norm. Wildlife flourishes and habitats are maintained, restored and expanded and linked effectively to other ecological networks. Woodland cover has increased and all woodlands are sustainably managed, with the right trees in the right places. Landscapes and habitats are managed to create resilience and enable adaptation. Everyone can discover the rich variety of England's natural and historic environment, and have the chance to value them as places for escape, adventure, enjoyment, inspiration and reflection, and a source of national pride and identity. They will be recognised as fundamental to our prosperity and well-being.

VISION FOR EXMOOR NATIONAL PARK TO 2030

'Keeping Exmoor special' so that:

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

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

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

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

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

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

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

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

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

The impacts of climate change on Exmoor's natural environment, its communities, businesses and the effect on its resources are better understood through monitoring and research. They are being planned for and actively addressed through mitigation and adaptation measures to help make Exmoor more resilient to changes without compromising the special qualities of the National Park. The coastal communities of Porlock Weir and Lynmouth, affected by sea level rise, are working with the NPA and other partners to plan for and adapt to changes. Since Exmoor is an exemplar for sustainable development it has inspired local communities and visitors to live within environmental limits and sustainable development can be seen in action as everyone is inspired to play their part in working towards a carbon- neutral National Park and more sustainable lifestyles increasing energy efficiency to help tackle and adapt to climate change. Appropriate renewable energy technologies, are in place and these are located, designed and at a scale to conserve Exmoor National Park's landscape and wildlife with areas, including its skylines and open expanses, remaining free of them. Exmoor's communities have found ways of reducing, reusing and, recycling waste and have access to facilities. Together with sustainable agriculture, low carbon transport and travel, sustainable living is becoming the norm.

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

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

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

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

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

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

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

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

OBJECTIVES

2.3. The vision has been translated into objectives which are ~~also shared with the Management Partnership Plan. The objectives are Exmoor National Park Authority's the~~ priorities for planning within the Exmoor National Park. The policies within the Plan, when implemented, will contribute towards meeting the vision and objectives. The objectives are set out below and throughout the Plan where appropriate. ~~at the beginning of each chapter where they are as relevant.~~

1. To conserve and enhance Exmoor's landscapes as living working landscapes that remain predominately free from intrusive developments, maintain a sense of tranquillity and protect Exmoor's dark skies.
2. To ensure that Exmoor's moorlands remain open, remote and relatively wild in character; that views are preserved, and strategically important areas of former moor and heath are managed in a way that restores their wilder landscape character.
3. To protect and enhance Exmoor's wildlife and habitats and seek to improve the diversity, extent, condition and connectivity of Exmoor's important and valued habitats.
4. To maintain or increase the populations of native wildlife species on Exmoor that are valued for their conservation status and local distinctiveness, and control and eradicates non-native species.
5. To ensure that the built tradition, character, distinctiveness and historic character of Exmoor's settlements, buildings, farmsteads, landscapes, archaeological sites and monuments is conserved and enhanced and that the cultural heritage of Exmoor is protected through the careful management of development.
6. To encourage new development to use local materials, sustainable building design and methods, in ways that contributes to the distinctive character and cultural heritage of Exmoor.
7. To conserve and enhance Exmoor's natural resources and to improve air and water quality, conserve water resources, ensure soils are in good condition, maximise carbon storage, and minimise pollution.
8. To provide opportunities for people from all backgrounds and abilities, including young people and new audiences, to learn about and enjoy Exmoor National Park, leading to a greater understanding of Exmoor and its way of life.

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

3. SPATIAL PORTRAIT

3.1 Exmoor was designated as a National Park in 1954 and is situated within the counties of Somerset and Devon. The total area of the National Park is 693 square kilometres (267 square miles), of which approximately two thirds lies within the West Somerset District and one third of the area in the North Devon District. The northern boundary is formed by the Bristol Channel. A total of 43 parishes are within (or partly within) the National Park with most of the population living in small dispersed settlements.

CONSERVING AND ENHANCING EXMOOR

3.2. Exmoor is one of the few upland areas of southern England, the highest point at Dunkery Beacon rising 519m (1704 feet) above sea level. The landscape has been shaped by both natural elements and human activity over thousands of years; however, its remoteness, topography and climate have helped to maintain a large extent of well preserved, semi-natural upland landscapes and undeveloped coastline.

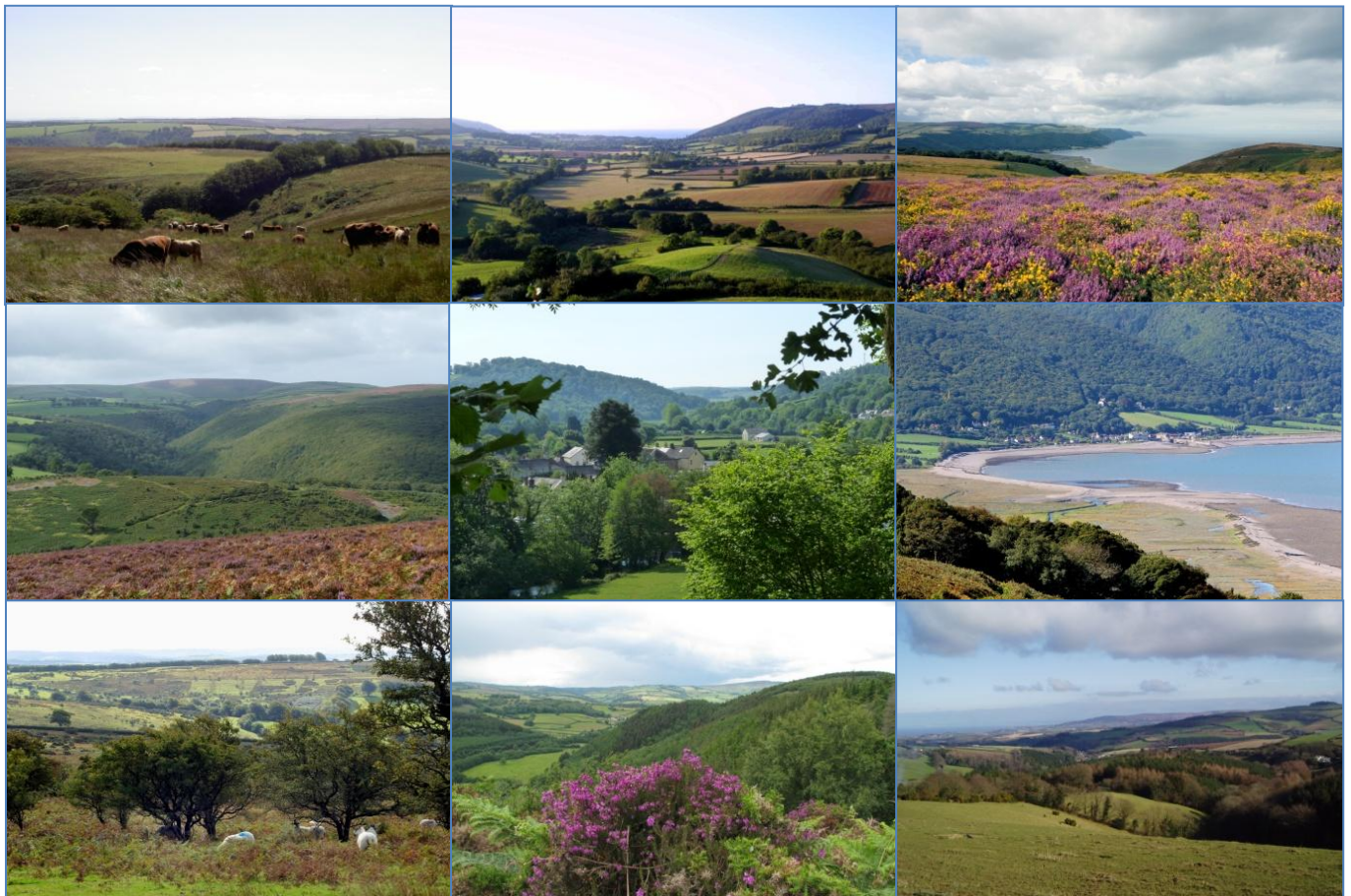


Figure 3.1 Landscape Character Types on Exmoor: (Each row L-R): Enclosed Farmed Hills with Commons – Codsand Moor; Farmed and Settled Vale – Porlock Vale; High Coastal Heaths – Bossington Hill; High Wooded Coast, Combes and Cleaves - View from Easter Hill; Incised Wooded Valleys - Barle Valley at Dulverton; Low Farmed Coast and Marsh – Porlock Marsh; Open Moorland – Winsford Hill; Plantation Hills – Grabbist Ridge View; Wooded and Farmed Hills with Combes – Brendon Hills.

3.3. The Exmoor landscape is extremely diverse and characterised by the extent of semi-natural vegetation over moors, mires, woodland and coast; these areas are fringed by farmland that has its own distinctive character. The Exmoor National Park Landscape Character Assessment (LCA) is based on a detailed understanding of the landscape. Published in 2007, the LCA identifies nine different landscape character types which define the diversity and character of the Exmoor landscape (see fig 3.1).

3.4. Some of the darkest skies in England are found in Exmoor. In 2003 The Campaign to Protect Rural England (CPRE) and the British Astronomical Association produced light pollution maps

of the UK. The study highlighted Exmoor as a dark sky island in a growing sea of light pollution. Darkness is an important component of the tranquillity and quality of Exmoor's landscape character. In October 2011 Exmoor became the first National Park to achieve 'Dark Sky Reserve' status and only the second Dark Sky Reserve in the world.

- 3.5. Exmoor has an extraordinary variety of wildlife and habitats that provide numerous opportunities for people to understand and enjoy nature, and are a key reason why people visit the National Park. Around 28% of the National Park is designated by UK and European law to protect its distinctive wildlife, a large part of this area is internationally designated as Special Areas of Conservation or nationally designated as Sites of Special Scientific Interest (SSSIs) and National Nature Reserves (NNRs). There are many rare species found in the National Park and the Exmoor Biodiversity Action Plan lists 118 species as being 'important', of which 33 animals and plants have been specified as 'key species' meriting special attention for their conservation.

CULTURAL ENVIRONMENT

- 3.6. The character of buildings and settlements also varies considerably with diverse vernacular building styles and materials reflecting local geology and traditions, as well as periods of significance in each settlement's history. The built heritage of Exmoor is therefore a valued and distinctive feature of the National Park. The siting and form of Exmoor's long established settlements have been determined largely by physical factors such as local materials, topography and climate. Exmoor's built environment consists of a range of dispersed farmsteads, hamlets and villages as well as market towns and Victorian coastal resorts.
- 3.7. A variety of vernacular building materials have resulted in a diversity of traditional building designs across the National Park that integrate with the surrounding landscape character. Exmoor's traditional buildings are generally constructed from sandstone, sometimes with lime render, and cob. Roofing materials such as (wheat-reed) thatch and local, Cornish or Welsh slates and clay tiles have been traditionally used depending on the age of the building and its location. The range of materials, details and finishes found in Exmoor's buildings has established a distinct palette of colours and textures which are essential elements of detailed design, settlement character, and local identity. Although in the past there were a number of small scale local quarries, now there are no active mineral extraction workings within the National Park. Local stone resource has therefore been obtained from quarries outside the National Park boundary.
- 3.8. The excellent quality of preservation of archaeological sites and historic features and the diverse nature of the historic resource within the National Park make it of special significance. However, these resources are also fragile, vulnerable to insensitive change and, ultimately irreplaceable. Significant research has been undertaken in recent years, which has considerably increased understanding of the heritage of Exmoor.

RESPONDING TO CLIMATE CHANGE & MANAGING RESOURCES

- 3.9. A significant challenge for the National Park Authority is to enable landowners, communities and businesses across Exmoor to mitigate the causes and adapt to the effects of climate change. The Exmoor National Park Carbon Neutral Programme aims to transform Exmoor into a low carbon community through a number of measures such as implementing energy efficiency measures, renewable heat and electricity technologies, changing travel patterns, and developing carbon sinks and other local solutions relating to land management and farming.
- 3.10. There has already been considerable success in developing local approaches to low carbon living and mitigating climate change through taking advantage of renewable energy sources. A number of communities have benefitted from installing renewable energy systems in local services and businesses through the Low Carbon Communities Challenge fund. Other Government incentives have resulted in the installation of a large number of small-scale renewable energy schemes across the National Park. These have been predominantly solar photo-voltaic panels, but also include wind turbines and micro-hydro schemes. Whilst small-scale renewable energy schemes are encouraged, some forms of this technology are more easily assimilated within the National Park's high quality landscape than others.
- 3.11. In terms of sustainable building methods, recent local need affordable housing developments developed by Registered Providers (housing associations) have incorporated sustainability

measures meeting Level 3 of the Code for Sustainable Homes. Improving the energy efficiency, sustainable use of natural resources, and better adaptation to climate change in developments is encouraged. The forthcoming staged amendments to building regulations will result in the Zero Carbon Homes standard being applied by 2016, with non-domestic buildings expected to be zero carbon by 2019 which will help to improve the sustainability of future developments in the National Park. The Carbon Neutral Programme¹² also encourages an energy efficiency programme for existing homes and businesses to help reduce carbon emissions emitted as a consequence of energy used for heating.

- 3.12. **Flood Risk:** The topography and geology of Exmoor significantly influences the catchment hydrology and the response to rainfall. Many of the watercourses within Exmoor National Park form incised channels flowing through steep confined valleys, where channel gradients are steep, flood flows respond rapidly to rainfall and velocities and depths can be high. Most settlements on Exmoor are located in valley bottoms and often the low-lying areas of the settlement are at risk of flooding. It is predicted that climate change will result in milder wetter winters that are characterised by periods of long duration rainfall. However, frequent and short duration, high-intensity rainfall linked with longer drier summers is also predicted. These scenarios are likely to cause increased flooding from fluvial, surface water and sewer sources. In addition, the effects of climate change on sea level will increase the likelihood of coastal and tidal flooding in low lying areas¹³. This is a key constraint for new development and enabling existing development to adapt to the increased risk of fluvial and coastal flood events as an effect of climate change.
- 3.13. **Pollution:** Air quality in the National Park is generally thought to be good; however some habitats have been shown to be particularly sensitive to nitrogen deposition through acid rain – including blanket bog and old sessile oak woods¹⁴. These habitats are found within the internationally designated Special Conservation Areas and have been found to exceed the maximum amount of nitrogen deposition that can be tolerated before damage is caused. The ecological status of the majority of river length, including the Barle, Exe, West Lyn and Badgworthy Water, in the National Park area is good. Other watercourses classified as moderate or poor are subject to ongoing surveys and monitoring to identify further measures to improve their ecological quality.
- 3.14. **Waste:** The waste generated within the Park is recycled, composted and land-filled at sites outside the National Park. Both North Devon and West Somerset district councils operate kerbside recycling schemes, and a number of settlements also have community recycling facilities available so that waste is managed in a more sustainable way.

ACHIEVING A THRIVING COMMUNITY

- 3.15. The population of Exmoor was 10,273 in 2011 a decline of 600 (5.5%) from 2001. Approximately three-quarters of the population are within the West Somerset area of the National Park, and a quarter within the North Devon area. Exmoor's age profile shows a slight shift in the demographic pattern as the proportion of the population aged 60 years¹⁵ and over has increased by over 6% from 2001 to 39.5%. Exmoor together with The Broads, have the highest mean average age of all National Parks in England and Wales. Consequently there is a slightly lower proportion of people aged up to 14 (-2.3%) – however the most significant decrease has been within the 30 to 44 age group (-5.7%). Patterns of migration have shown that there has generally been a net increase of population through in-migration to both North Devon and West Somerset districts¹⁶ which has not been reflected on Exmoor. However, the high proportion of homes with 'no usual residents' (empty, second and holiday homes) has increased since 2001 by 5.5%¹⁷, this factor, combined with the out-migration of younger people, is likely to account for the population decline. The significant proportion of dwellings without permanent residents can exacerbate the problem of maintaining the viability of local services.

¹² Exmoor National Park Carbon Neutral Programme Consultation 2010 – Forum 21

¹³ West Somerset Council and Exmoor National Park Authority Level 1 Strategic Flood Risk Assessment

¹⁴ Environment Agency and English Nature assessment in 2006

¹⁵ 39.5% of the population aged over 60 in 2011 compared to 33.1% in 2001

¹⁶ Northern Peninsula Strategic Housing Market Assessment 2008 (NPSHMA)

¹⁷ 19.2% of households with no usual residents in 2011 Census

3.16. The highest proportion of household type on Exmoor relates to family households; however, almost a third are single person households with single pensioner households constituting 17.7% of occupied households, whilst other single person households account for 13.8%. In the West Somerset area of the National Park over a third of households consist of only people aged over 65. Population projections identify a dramatic growth in single person households (50%), most of whom will be older people) and a reduction in family households with more than one child (dependent and non-dependent)¹⁸.

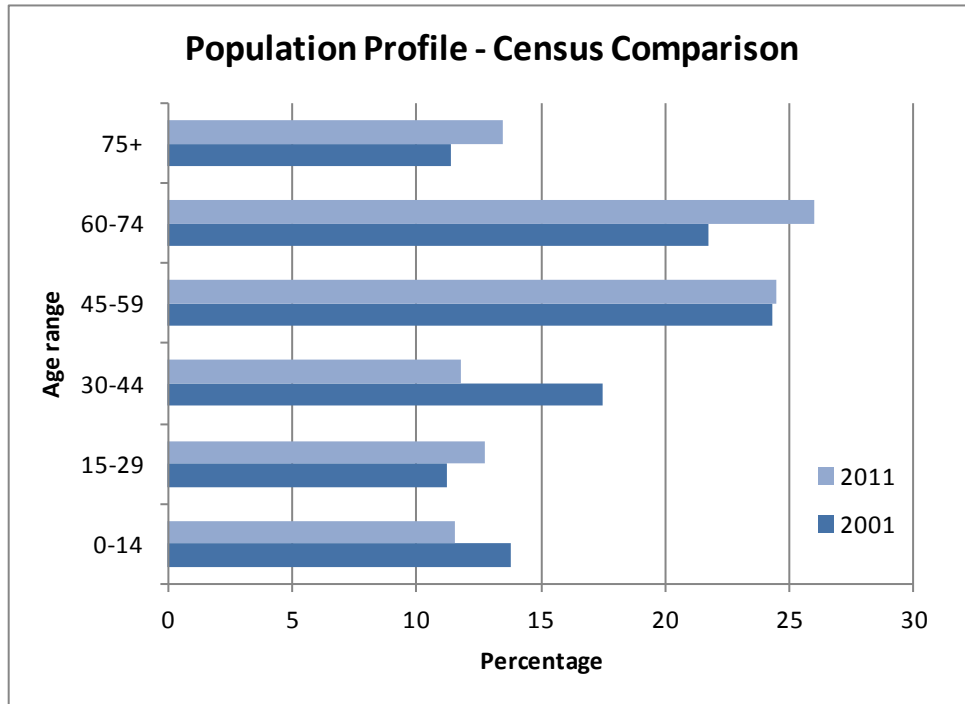


Figure 3.2 Population Profile of Exmoor National Park

3.17. The majority of housing (47%) within Exmoor is detached, which is comparable to other National Parks, but considerably higher than national and regional figures. The proportion of detached dwellings has slightly decreased with a comparable increase in the proportion of flats and apartments. Most housing is owner-occupied, with 46% of houses owned outright with no mortgage. This high percentage may reflect in-migration of those selling homes elsewhere to buy housing outright in the high quality environment of the Exmoor National Park. A residential occupancy survey in 2000 of recently completed dwellings found that 89% were occupied by people who had previously lived outside the National Park boundary, and 54% were people who had lived outside of the south west region. However, despite this trend, around a third¹⁹ of occupied household spaces are rented from social and private landlords; this is significantly higher than regional or national figures and reflects the significance of providing affordable housing within the National Park.

3.18. Exmoor has one of the highest differentials between local wages and house prices in the country. The average household income in 2010 was £28,668²⁰ the lowest for all English National Parks and 15% lower than that for the South West region as a whole. In 2012 the mean average house price²¹ was £392,555 – 74% higher than the average house price for the South West region. Evidence shows that households with an average income would not be able to afford the mean average house price in the lowest quartile at £169,573 without a significant deposit; whilst households with below average income are even further constrained. The Exmoor, North Devon and West Somerset Rural Housing Project, funded by a partnership of local authorities and registered providers (housing associations), has worked in the National Park and the adjoining rural areas of the two districts since 2002 to carry out Parish Housing

¹⁸ Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset – Housing Vision 2013

¹⁹ 33.6% social and private rented housing – 2011 Census ONS

²⁰ National Parks: economic comparison – DEFRA Rural Statistics Unit 2010

²¹ Exmoor National Park Annual House Price Survey 2012

Needs Surveys and to work with organisations, communities and landowners to help create new affordable housing for local communities. Since policies were introduced in the last Local Plan (adopted March 2005) to ensure all new housing in the National Park met a local affordable need, 101 units have been granted planning permission in communities across Exmoor²².

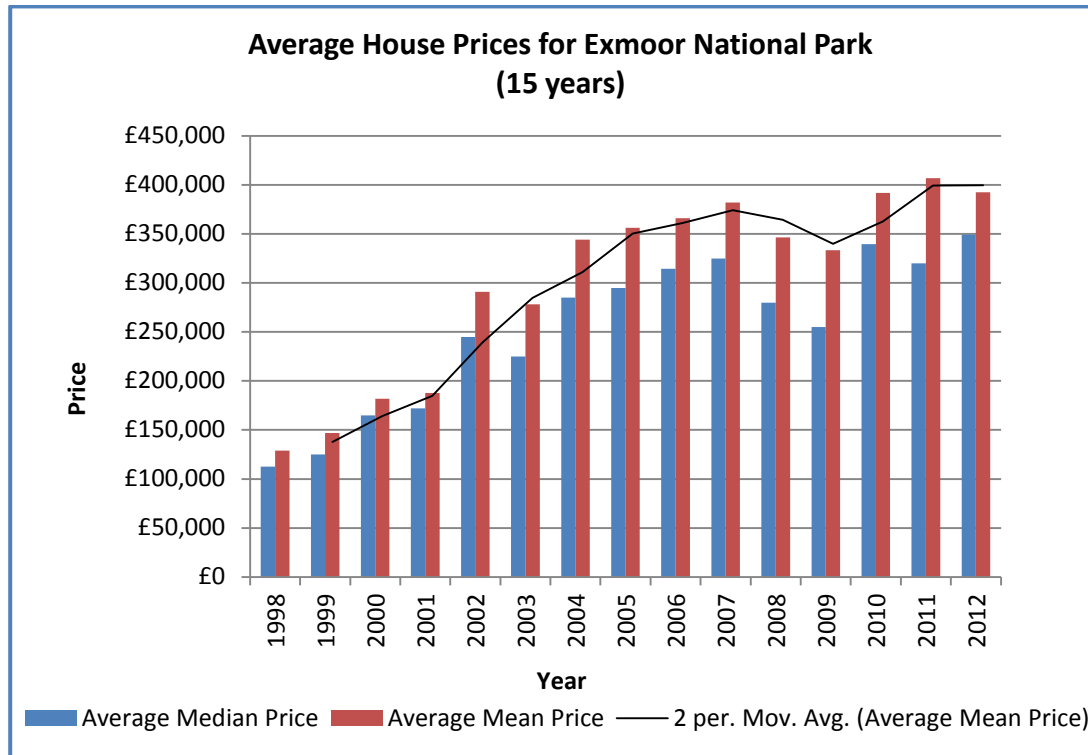


Figure 3.3 Mean and median average house prices for Exmoor National Park 1998 - 2012²³

- 3.19. In-migration has had an impact on both the economy and the social fabric of Exmoor, including retired, semi-retired, commuters, and second-home residents. The attractiveness of the area to relatively wealthy incomers can help to maintain the local economy and services, but also places additional pressures on the local housing market²⁴.
- 3.20. The larger settlements that provide a range of services, facilities and employment for the resident community and a wider hinterland are Porlock, Dunster, Dulverton and Lynton & Lynmouth; however a greater range of services are found in the surrounding areas within the nearby coastal and market towns of Minehead, Taunton, Tiverton, South Molton, Barnstaple and Ilfracombe (see the Key Diagram). Community services and facilities within Exmoor’s smaller villages are relatively restricted; and loss of services has been exacerbated by the closure of three Post Offices during 2008 as a result of national changes to the Post Office service. This has resulted in the closure of two village shops which have been replaced either by existing services or through shared facilities. Recent years have also seen a number of small petrol stations close, leading to only six remaining facilities available for residents and visitors (two of which are located in the same settlement).
- 3.21. There are six first schools, two primary schools and a middle school within the National Park; access to further and higher education is poor due to travel distances and the lack of accessible public transport. Due to falling school roles, a 2006 review of the schools within the National Park by the education authorities led to the majority of Exmoor schools forming federations across the National Park to enable closer working and sharing of resources. However, further reviews of how education is delivered in the National Park have not been ruled out by the education authorities. West Somerset College in Minehead and Ilfracombe Media & Arts College are the main providers of secondary and further education; the

²² At the time of consultation on the Draft Local Plan (November 2013)

²³ Exmoor National Park Annual House Price Survey 2012

²⁴ Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset – Housing Vision 2013

percentage of students achieving 5 or more GCSE's between grades A*-C are 49% and 35% respectively²⁵. These figures are lower than averages for the local authority area and nationally.

ACHIEVING A SUSTAINABLE ECONOMY

- 3.22. Exmoor's landscape has limited the development of centres of population and the main service centres for Exmoor villages are situated around its periphery, these local circumstances have an important bearing on the strength of the economy and its potential for growth. In 2011 there were 7,626 people of working age²⁶ within the National Park, of which two thirds (66.6%) were economically active – this low figure can be explained by the relatively high proportion of economically inactive retired persons which accounts for 23% of the working age population. Set against this figure however, is a relatively low level of unemployment. The majority of the economically active population are self-employed (39%), which continues to reflect an economy dominated by small scale businesses. A large sector of the working population work at or from home (31%) – this is a considerable proportion of the working age population when compared to the national average (9%)²⁷, but reflects the rurality of the National Park, and the increasing importance of high speed broadband roll out to sparse rural areas that can enable people to work effectively at home.
- 3.23. In terms of the number of employees, the 2011 census results indicate that the largest proportion of the working population (15.6%) is employed in the accommodation and food service sector. This is a reflection of the nature of the National Park and its attractiveness as a tourist destination. The retail sector accounts for 14.2% of employees which tourism will indirectly and directly influence. The third largest business sector is agriculture, hunting and forestry with 11.7% of all employees. Together these three sectors make up over 40% of employment within the National Park showing that tourism (see paras.3.26 – 3.29) and land-based enterprises are the main drivers of the local economy and an important employment resource.
- 3.24. Agriculture and forestry is essential for the maintenance of the characteristic landscape of the National Park relating to its mosaic of vegetation cover, the wildlife it supports, the pattern and character of Exmoor's farmsteads. Traditional hill farming and the skill and commitment of the farming community therefore provide economic benefits locally and regionally. The agricultural economy is dominated by livestock farming, which is typical of upland farms, and has access to a combination of moorland, enclosed pasture and improved land. Upland farms are typically larger than lowland farms, and tend to be owned by one farmer, or has been in one family for a long period of time. It is also more likely that the farmer is over 65 years of age. As at 2005, there were a total of 864 registered farm holdings covering an area of 53,000 ha on Exmoor, some of which will be small holdings. Research has predicted a continuing increase in the average size of farms due to moves towards even more extensive farming and a commensurate reduction in numbers of people supported by upland farming which could result in the loss of upland management skills. Farm diversification is an important source of revenue for hill farms as research shows that the average farm business generates substantial under-payment for farm family's labour and no return on their investment in the business²⁸.
- 3.25. There are emerging employment opportunities which exist in a number of key sectors in the National Park including agriculture, agricultural/forestry products, tourism, environmental technologies, lifestyle and knowledge-based businesses.

ACHIEVING ENJOYMENT FOR ALL

- 3.26. Tourism is a vital component of the economy on Exmoor. The opportunities that Exmoor offers are rare in southern England and surveys support the view that the area remains an important environmental asset for a wide range of people. Most visitors to Exmoor come to enjoy unspoiled countryside (91%) and outdoor recreation (69%), of which walking is the most

²⁵ 2012 Department for Education Performance Table Results

²⁶ Usual resident population aged 16-74

²⁷ 2001 Census data – awaiting statistical release of this data for National Parks for 2011 Census

²⁸ Hill Farming Systems in South West England: Economic Viability and the Delivery of Public Goods (2008) University of Exeter

popular activity²⁹. There are over 1000km of public rights of way on Exmoor which enables access on foot, by bicycle and on horse-back. Permitted and de-facto access also have a very important role to play and many of the most popular routes include permitted sections. Exmoor's open access land provides opportunities for more adventurous walkers and some areas of open access for horse riding are also available.

- 3.27. Other forms of recreation include on-water activities, and field sports including a notable increase in game-bird shooting, that help to extend the season for accommodation providers which cater for this market.
- 3.28. The high quality landscape, wildlife and cultural heritage that Exmoor provides are major attractors for visitors^{30 31}. Exmoor's landscape and scenery are primary attractors for visiting the National Park and 79% of visitors specify tranquillity and peace and quiet³². Whilst many business owners may wish to see visitor numbers increase, the general quietness of Exmoor is one of its key assets. The National Park's Dark Sky Reserve status is helping to attract visitors to experience Exmoor's dark night sky and inspiring interest in astronomy.
- 3.29. Although it is relatively distant from large urban areas, Exmoor has always attracted a relatively high proportion of staying visits compared to day visits. Visitors to the National Park spend over £80 million each year, supporting businesses in the accommodation, retail, food and drink, recreation and transport sectors. Over 400 businesses in the accommodation sector alone rely on visitors for their income, where occupancy levels are higher for self-catering than serviced accommodation. The peak visitor season runs from Easter to the end of October on Exmoor.

ACHIEVING ACCESSIBILITY FOR ALL

- 3.30. Transport: Due to the rural nature of the National Park and its dispersed settlements, it is not unexpected that just over half of economically active people commute to work by car³³ with the average commuting distance around 13km³⁴. Key employment centres are situated outside of the National Park boundary within surrounding towns. A high percentage of housing and employment growth will be directed to Barnstaple and Taunton as significant centres for key services and employment. This may have implications for increased commuting out of the National Park, or local people relocating to access jobs and homes (where the housing is closer to their place of employment). More sustainable transport solutions are encouraged, such as walking, cycling and using public transport, but it is recognised that for the majority of journeys the car is the only practical solution. Relatively few communities have access to a year round daily³⁵ bus service, although there are opportunities to use demand responsive transport for parishes within the West Somerset area of the National Park and community transport schemes to help those with no or limited access to transport access shopping or medical and other healthcare needs.
- 3.31. Exmoor has two principal transport routes, the A39 and A396 (with a short section of the A399 passing through the western edge of the Park), some B roads are also significant especially for local freight movements; the Exmoor Route Network Map (see Section 10 Achieving Access For All and the Proposals Map) illustrates the most significant transport routes within the National Park. Traffic flows on Exmoor are increased particularly during the main summer months when greater numbers of tourists visit the National Park. The Moorland Rover bus provides a flexible service for residents and visitors to enable them to access and enjoy the National Park. Although traffic pressures are not severe there can be specific locations which face congestion issues and parking problems during the busy holiday periods particularly within Porlock, Dunster, Dulverton and Lynton & Lynmouth. The annual average daily traffic figures have remained relatively stable over recent years³⁶.

²⁹ Exmoor National Park Authority Visitor Survey 2010

³⁰ Tourism Economy of Exmoor 2004

³¹ South West Tourism and Valuing our Environment 1998 - National Trust

³² ENPA 2010 Exmoor Visitor Survey

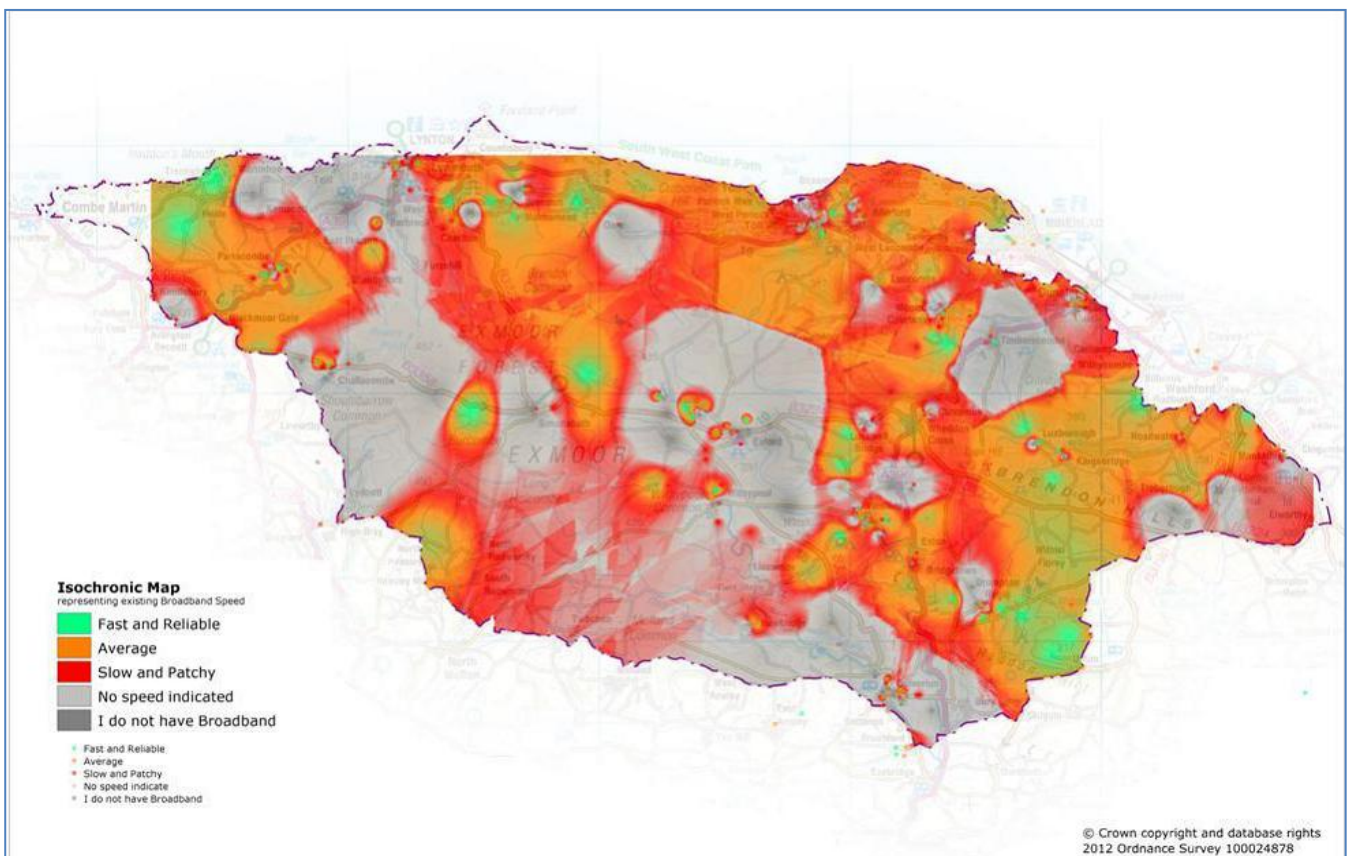
³³ 2001 Census – awaiting statistical release of this data for National Parks for 2011 Census

³⁴ 2001 Census – awaiting statistical release of this data for National Parks for 2011 Census

³⁵ Running at least on a Monday – Saturday basis

³⁶ ENPA Annual Monitoring Report 2011-12

- 3.32. **Communication:** Access to broadband and mobile telecommunications across the National Park has been identified as a key issue. Due to the dispersed nature of rural settlements, broadband speeds tend to be average to very slow (see Map 3.1), compared to main urban areas that have benefitted from the roll-out of high speed connections to date.
- 3.33. Much of the demand for broadband in rural areas is driven by online shopping, banking and communication. Currently, the incidence of rural home working is as much as three times greater than for urban areas nationally. Within the National Park almost a third of the working age population works at or from home³⁷. The negative impacts of the digital divide are increasingly evident. However, existing telecommunications infrastructure has already benefited those rural areas with broadband access through: businesses relocating to rural areas from urban areas to enjoy a better quality of life; people moving out of cities on the basis they can work from home and access online services; and the potential for rural manufacturers and retailers to access worldwide markets³⁸. Improving and adapting this infrastructure can ensure that the social and economic benefits of accessing digital technology are available across the National Park. Access to superfast broadband is being addressed across the National Park through Connecting Devon and Somerset to help deliver faster broadband to the rural areas of both counties. Broadband will help to overcome significant transport constraints experienced by rural upland areas, through increased home working, distance learning and remote access to public services.
- 3.34. There are a number of mobile telecommunication masts across Exmoor which generally serves the larger centres/areas of population; this leaves a number of areas and communities unable to receive a mobile phone signal as it is not always cost-effective for mobile operators to improve coverage. A Mobile Infrastructure Project has been set up by the Department of Culture, Media and Sport to invest in improving mobile coverage in rural areas. The National Park Authority is within the Phase 2 area, and the project intends to bring improved coverage from 2013 to 2015³⁹.



Map 3.1: Broadband speeds across the National Park (Your Future Exmoor 2010)

³⁷ 2001 Census – 31.35% of people aged 16 – 74 in employment who work mainly at or from home within Exmoor National Park – awaiting statistical release of this data for National Parks for 2011 Census

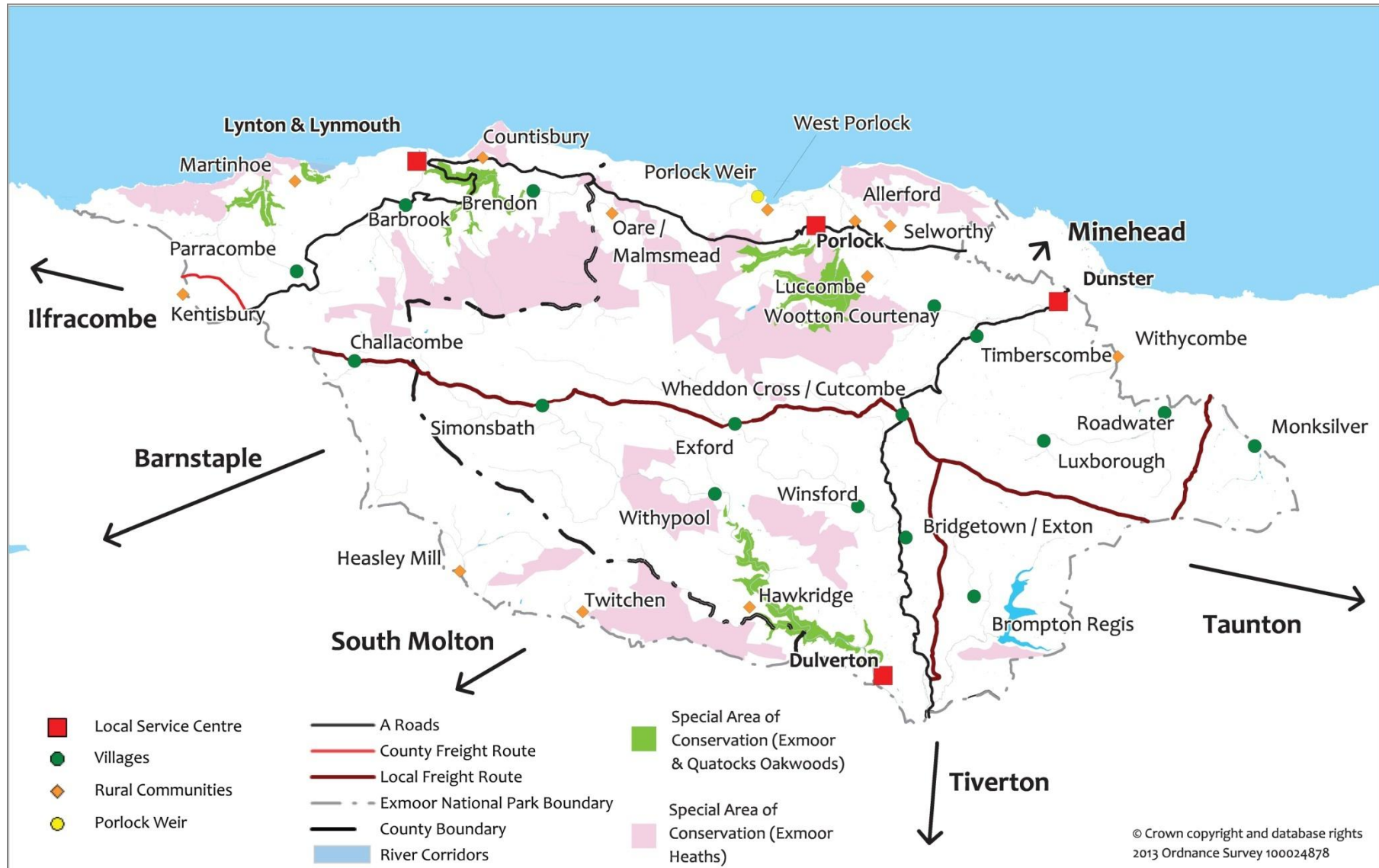
³⁸ CRC Mind the Gap (2008)

³⁹ <https://www.gov.uk/government/policies/making-it-easier-for-the-communications-and-telecoms-industries-to-grow-while-protecting-the-interests-of-citizens/supporting-pages/improving-mobile-coverage>

KEY DIAGRAM

3.35. The Key Diagram (Map 3.2) sets out the strategy of the Local Plan in a visual context. It identifies the spatial strategy for the National Park (General Policy GP4 Spatial Strategy) which provides the basis for future housing and employment development across Exmoor, as well as environmental areas of international significance.

MAP 3.2 KEY DIAGRAM



4. GENERAL POLICIES

INTRODUCTION

4.1. ~~Four~~ This Local Plan contains six general policies have been developed which will apply to all development within Exmoor National Park Authority and should therefore be read in conjunction with all other policies in the Plan. Policy GP1 ~~reflects~~ incorporates National Park purposes and defines sustainable development for Exmoor National Park. Policy GP2 is the model policy - it is a requirement for Local Plans to include this policy. Policy GP3 sets out the tests for major development within the National Park. Policies GP1 and GP3 together fulfil the requirements of European Union Directives and the Environment Act 1995 and reflect national planning policy. Policy GP4 sets out the spatial strategy for the National Park. It identifies 'named' settlements and thereby where the location and type of new development, will be focussing most development in the named settlements, and what type of development is permitted within the settlements identified under the distinct categories of Local Service Centres, Villages, and Rural Communities. Policy GP5 sets out ~~the National Park's policies on~~ the approach in the National Park to conditions, obligations and community levies to ameliorate impacts from development. Policy GP6 sets criteria to achieve the enhancement of the National Park consistent with National Park statutory purposes.

ACHIEVING NATIONAL PARK PURPOSES AND SUSTAINABLE DEVELOPMENT

CONTEXT

4.2. The National Park Circular 2010 states that the National Park Authorities' primary responsibility is to deliver their statutory purposes and in doing so, that they should ensure they are exemplars in achieving sustainable development, helping rural communities in particular to thrive. The Circular sets out a joint vision to 2030⁴⁰. ~~including that: *By 2030 English National Parks and the Broads will be places where there are thriving, living, working landscapes notable for their natural beauty and cultural heritage. They inspire visitors and local communities to live within environmental limits and to tackle climate change. The wide range of services they provide (from clean water to sustainable food) are in good condition and valued by society. Sustainable development can be seen in action. The communities of the Parks take an active part in decisions about their future. They are known for having been pivotal in the transformation to a low carbon society and sustainable living. Renewable energy, sustainable agriculture, low carbon transport and travel and healthy, prosperous communities have long been the norm.*~~

PURPOSES AND DUTY OF THE NATIONAL PARK

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

National Park Authority Purposes:

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

National Park Authority Duty:

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

⁴⁰ National Parks Vision and Circular 2010

- 4.4. Exmoor National Park will continue to seek early discussion on proposals and close working and co-operation with partners in order to find solutions and avoid potential conflicts. However, where there is irreconcilable conflict between the National Park purposes, the first purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage should prevail. This concept is known as the ‘Sandford Principle’⁴¹
- 4.5. The achievement of National Park purposes relies on the active support and co-operation of Government and public bodies including local authorities and utility companies whose activities affect Exmoor. Section 11 A of the Environment Act 1995 requires that “a National Park Authority, in seeking to foster the wellbeing of local communities within the National Park, shall co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the National Park”. ~~As ‘Relevant authorities’ many also have legal obligations under section 11A of the 1949 Act and section 17A of the 1988 Act which places a statutory duty on them to have regard to National Park purposes when making decisions or carrying out activities relating to or affecting land within the National Park⁴² and Section 62 (2) of the Environment Act 1995, places a duty on ‘public bodies and authorities to ‘have regard to’ the purposes of designation in carrying out their work.~~ Authorities and public bodies must show they have fulfilled this duty. Where their activities outside National Parks might have an impact inside them, the Government says they should have regard to National Park purposes⁴³. Public bodies also have a duty to cooperate on planning issues that cross administrative boundaries⁴⁴. The NPA will work in partnership and cooperate with relevant authorities they should—including with the neighbouring Local Planning Authorities of West Somerset and North Devon, to ensure that proposals outside the National Park are consistent with its statutory purposes.

SUSTAINABLE DEVELOPMENT

- 4.6. A fundamental aim of the ~~Core Strategy~~ Local Plan is to ensure that development in the National Park is sustainable. A widely-used and accepted definition of sustainable development is: “development which meets the needs of the present without compromising the ability of future generations to meet their own needs.”⁴⁵
- 4.7. The UK Sustainable Development Strategy 2005, sets out five guiding principles for sustainable development which includes living within environmental limits, ensuring a strong, healthy and just society, achieving a sustainable economy, using sound science responsibly and promoting good governance.
- 4.8. The Government sets out, in the ~~new draft~~ National Planning Policy Framework (NPPF) that the purpose of planning is to help achieve sustainable development. It sets out ‘a presumption in favour of sustainable development which should be seen as a ‘golden thread’ running through both plan making and decision taking’⁴⁶. The NPPF sets out three components dimensions to sustainable development: the economic, social and environmental roles for the planning system to deliver ~~of what delivering sustainable development. means for the planning system:~~
- a) **an economic role** – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
 - b) **social role** – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and supports its health, social and cultural well-being; and

⁴¹ Section 11a (2) of The National Parks and Access to the Countryside Act 1949 (inserted by Section 62 of the Environment Act 1995)

⁴² Section 62 11A (2) of the Environment Act 1995 states that “in exercising or performing any functions in relation to, or so as to affect, land in a National Park, any relevant authority shall have regard to the [National Park purposes specified in subsection (1) of section five of this Act and, if it appears that there is a conflict between those purposes, shall attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area comprised in the National Park”

⁴³ Paras 4-8 DEFRA (2005) Guidance Note: Duties on relevant authorities to have regard to the purposes of National Parks, Areas of Outstanding Natural Beauty and the Norfolk and Suffolk Broads DEFRA, London

⁴⁴ Para 178 National Planning Policy Framework (NPPF) 2012 Department of Communities and Local Government (DCLG)

⁴⁵ Bruntland Commission “Our Common Future” (1987)

⁴⁶ Para 14 NPPF 2012 DCLG

- c) **an environmental role** – contributing to protecting and enhancing our natural, built and historic environment, and as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change, including moving to a low-carbon economy.
- 4.9. The Government states that these three components should be pursued in an integrated way, looking for solutions which deliver multiple goals.
- 4.10. Policy GP1 sets out the criteria to ensure that new development is consistent with National Park purposes and defines sustainable development in Exmoor National Park. In order to ensure that development contributes to the achievement of the Partnership Plan/Local Plan Vision and objectives (the strategic priorities for the Local Plan), GP1 requires that development proposals should demonstrate that they will not conflict with the vision and objectives.

GP1 ACHIEVING NATIONAL PARK PURPOSES AND SUSTAINABLE DEVELOPMENT

1. Sustainable Development for Exmoor National Park will conserve and enhance the National Park; its natural beauty, wildlife and cultural heritage and its special qualities; promote opportunities for their understanding and enjoyment ~~of the special qualities~~ by the public; and, in so doing, foster the social and economic well-being of local communities. In achieving sustainable development, all proposals/development will demonstrate that:
 - a) ~~It is~~ they are consistent with the National Park's legal purposes and duty. Where there is irreconcilable conflict between the statutory purposes, the conservation and enhancement of the National Park will prevail consistent with the Sandford Principle;
 - b) where they are intended to enhance the National Park they are consistent with GP6;
 - c) ~~It they conserves and enhances the special qualities of Exmoor National Park;~~
 - d) ~~It~~ they does not conflict with the vision and objectives of the Exmoor National Park Partnership Plan and this Local Plan; and
 - e) ~~It~~ they contributes to the sustainable development of the area in line with the ~~sustainable development management~~ principles set out below.
2. All new development, activities and land uses within Exmoor National Park will conserve and respond to opportunities to enhance the National Park. Opportunities must be taken to contribute to the sustainable development of the area including by demonstrating that development:
 - a) ~~is of a scale, and~~ in terms of its scale, siting, use, layout, form, design, materials and intensity of activity respects, and has a favourable impact on, the character, local distinctiveness, appearance and historic and cultural features of the site and buildings, settlement, landscape and setting;
 - b) supports the function, sustainability and resilience of individual settlements and their communities, by retaining and strengthening their services and facilities, protecting their safe, attractive public places and employment opportunities, providing for a size and type of housing which helps create a balanced community and addresses local affordable housing needs, and enables access to local services and facilities, jobs and technology;
 - c) makes efficient use of land, buildings, services and infrastructure and is acceptable in terms of access and traffic levels and which, where appropriate, enables the use of sustainable transport;
 - d) will conserve or enhance tranquillity including Exmoor's dark sky and the quiet enjoyment of the National Park;
 - e) will not harm the amenities of visitors, local residents and occupiers of neighbouring properties;
 - f) uses traditional materials and, where available, local materials, employs sustainable construction principles and sustainable building materials, ~~and~~ minimises energy use and waste including taking account of the embodied energy of materials and by appropriately re-using any materials from existing buildings or the site;
 - g) Conserves and enhances the historic environment;
 - h) conserves and enhances the natural environment, networks of green infrastructure and conditions for biodiversity and geodiversity;
 - i) maintains the quality of natural resources including water and air and conserves soils, is acceptable in terms of ground conditions and ~~minimises~~ avoids or minimises pollution;
 - j) Considers the needs of future generations, sustainability and resilience to climate change and adapts to and mitigates the impacts of climate change, particularly in respect of carbon emissions, energy and water demand and flood risk; and
 - k) supports the health and socio-economic wellbeing of local communities and
 - l) encourages community participation.

PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

4.11. Policy GP2 sets out how the presumption in favour of sustainable development in the NPPF⁴⁷ should be applied. This policy has been required by Government as a way of meeting the presumption in favour of sustainable development. It has been adapted to ensure that the presumption does not conflict with the National Park's statutory purposes or the National Park Authority duty.

GP2: PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

1. When considering development proposals the National Park Authority will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area and is consistent with National Park purposes.
2. Planning applications that accord with the policies in the development plan will be approved without unnecessary delay, unless material considerations indicate otherwise. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the National Park Authority will grant permission unless material considerations indicate otherwise – taking into account whether:
 - a) any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
 - b) specific policies in that Framework, and particularly those relating to National Parks, indicate that development should be restricted; or
 - c) that granting planning permission would conflict with the National Park's statutory purposes or duty.

MAJOR DEVELOPMENT

CONTEXT

4.12. The Government's longstanding view has been that major development should not take place in National Parks save in exceptional circumstances, as set out ~~in the NPPF, the National Planning Policy Framework and English National Parks and the Broads UK Government Vision and Circular 2010.~~ Such circumstances include the Silkin Test principles – that the development is absolutely necessary, in the national interest and that there is no practical alternative. Certain categories of development will also require an Environmental Impact Assessment⁴⁸. Exmoor National Park's landscape is recognised as being relatively free from major structures or development. ~~In 2010/11 The majority of planning applications received by Exmoor National Park Authority had 295 planning applications and the majority of these applications were for relate to minor or other types of development and very few applications for major development come forward. As a result, However, due to the relative remoteness and tranquillity of the National Park and the scale and size of most proposals,~~ development that may be considered minor or small scale elsewhere may potentially have a significant and cumulative impact on the National Park's natural beauty. As such major development is not defined just in terms of its size but in terms of its impact on the National Park and its special qualities. Such development, depending on its scale and potential impact, could include: power stations; large scale renewable energy development; new transmission lines; large scale tourism and leisure schemes; oil and gas pipelines; waste management and mineral operations; sewage and water treatment works and road schemes.

4.13. Within the National Park there are two European sites for nature conservation: These are the Exmoor Heaths Special Area of Conservation (SAC) and the Exmoor and Quantocks Oak Woodlands SAC. Together with Special Protection Areas, such sites are collectively known as Natura 2000 Sites. Development, including major development, has the potential to affect the

⁴⁷ Paras 11-15 NPPF 2012 DCLG

⁴⁸ Environmental Impact Assessment (EIA) Regulations

conservation objectives of such sites, even where it might be remote from them. For example, habitats used by barbastelle bats can be nine or more kilometres from the SAC site while otters are known to have territories of up to 20km. Where there may be effects on Natura 2000 sites, both within the designated boundary or in areas which support the conservation objectives ecologically, it would need to be proved that there will be no significant effect. Policy GP2 requires therefore that there should be no significant effects to proposed or designated European sites for nature conservation both within the sites' boundaries and in areas that ecologically support the conservation objectives of the site.

GP3 MAJOR DEVELOPMENT

- 1. In securing National Park purposes, in responding to the National Park's duty to foster the social and economic wellbeing of its communities and in accordance with government guidance, applications for major development will not take place be permitted within Exmoor National Park except in exceptional circumstances and only then following the most rigorous examination and where they applicants can demonstrate that they are in the public interest and raise issues of national significance. Where, exceptionally, it is accepted that a proposal for major development is of national significance and needs to be located in the National Park, then every effort to avoid adverse effects will be required. Where adverse effects cannot be avoided, appropriate steps must be taken to minimise harm through mitigation measures. Appropriate and practicable compensation will be expected for any unavoidable effects that cannot be avoided or mitigated. ~~mitigate potential localised harm and compensate for any residual harm to the area would be expected to be secured.~~**
- 2. Proposals for major development will need to demonstrate to the satisfaction of the National Park Authority:**
 - a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy and local communities;**
 - b) the extent to which they will provide a significant net benefit to the National Park and its local communities;**
 - c) the cost of, and scope for, developing elsewhere outside the National Park, or meeting the need for it in some other way;**
 - d) any detrimental effect on the environment, the landscape, the National Park's special qualities and recreational opportunities, and the extent to which ~~that~~ it could be moderated through applying the avoidance mitigation, compensation sequence of tests set out in point 1 of this Policy;**
 - e) that the cumulative impact of the development when viewed with other proposals and types of development is acceptable;**
 - f) that there are no significant effects on proposed or designated European sites for nature conservation both within the sites' boundaries and in areas that ecologically support the conservation objectives of the site; and**
 - g) the scope for adequate restoration of the land once the use has ceased.**

SPATIAL STRATEGY

PURPOSE OF THE POLICY

- 4.14. Policy GP4 Spatial Strategy defines the settlement hierarchy which identifies where new development will be focussed, and what type of development is permitted in principle within the settlements identified as Local Service Centres, Villages or Rural Communities. The overall aim is to make these communities more sustainable over the long term. Outside of these settlements, the area is defined as the 'open countryside' and includes farmsteads, isolated dwellings and hamlets.

NATIONAL POLICY CONTEXT

- 4.15. National policy⁴⁹ states that the purpose of the planning system is to contribute to the achievement of sustainable development – the 'social role' is one of three key dimensions to sustainable development which should support strong, vibrant and healthy communities by providing the type of development that reflects the community's needs and supports its health, and social and cultural well-being.
- 4.16. Plans should take account of the different roles and character of areas and in promoting sustainable development in rural areas, locate development, such as housing, where it will enhance or maintain the vitality of rural communities. This includes recognising that groups of smaller settlements may share and support services within and between their communities. In promoting sustainable development, the effective use of land is a key consideration particularly land that has been previously developed and of low environmental value.
- 4.17. The publication of the Taylor Review⁵⁰ in 2008 provided an in depth focus on what sustainability should mean for rural areas. This report recognises that planning has an important role in delivering sustainable development in the right places to make positive contributions to people's lives, whilst ensuring the protection of important open spaces, the countryside and the natural and historic environment. However, the report highlighted that in many cases the criteria used to identify sustainable locations for development were too inflexible which meant that many settlements in rural areas faced a downward cycle of decline through loss of services and local people unable to afford to live there.

CONTEXT

- 4.18. Previous Local Plans for Exmoor National Park have identified a broad range of settlements as suitable locations for development including those with a relatively extensive range of services and facilities that also serve surrounding communities and smaller settlements with a more limited range of services that serve the local community. In preparing for this Local Plan the evidence arising from several stages of early consultation⁵¹ has focussed on reviewing the settlement hierarchy and identifying a wider range of settlements across the National Park where new development could be considered acceptable in principle based on the need to provide balanced and sustainable communities. This helped to inform the development of three strategic options for the location of new development:

- a) **Settlement Option A:** Allow for new build development in all towns and villages listed in the Exmoor National Park Local Plan 2001-2011 namely: Allerford, Barbrook, Bridgetown/Exton, Brendon, Brompton Regis, Challacombe, Dulverton, Dunster, Exford, Luccombe, Luxborough, Lynton and Lynmouth, Monksilver, Parracombe, Porlock, Roadwater, Simonsbath, Timberscombe, Winsford, Withypool, Wheddon Cross/Cutcombe and Wootton Courtenay.
- b) **Settlement Option B:** Allow for new build development only in those towns and villages where there is a school, a regular bus service which runs 5+ times a week and a shop. This would include: Cutcombe/Wheddon Cross, Dulverton, Dunster, Exford, Lynton and Lynmouth, Parracombe, Porlock and Timberscombe.

⁴⁹ NPPF 2012 DCLG

⁵⁰ A Living Working Countryside: The Taylor Review of Rural Economy and Affordable Housing (2008)

⁵¹ Stakeholder Issues & Options Consultation (Nov 2008 – Jan 2009), Your Future Exmoor (Jan – Mar 2010) and Housing & Settlements Topic Group Meeting (Nov 2010)

- c) **Settlement Option C:** Allow for new build development in all towns and villages listed in Option A and settlements with a shop and/or pub and/or village hall⁵². This would include the additional settlements of: Hawkridge, Twitchen, Heasley Mill, Martinhoe, Countisbury, Rockford⁵³, Oare, Porlock Weir, West Porlock, Selworthy, and Withycombe.

STRATEGIC OPTIONS CONSULTATION FEEDBACK

- 4.19. Response to the consultation was low with 57 responses overall, although the consultation was widely publicised and corresponded with consultation on the National Park Partnership Plan. In terms of responses to the options for the location of new development, Option C received the highest proportion of responses (39% or 22 responses), with Options A and B closely aligned at 24% and 23% respectively. Associated comments were strongly supportive of an approach that helped to sustain a wider range of settlements on Exmoor.
- 4.20. Those in support of options A and B were concerned about the role of settlements in the National Park and their suitability in meeting all socio-economic needs of communities within the National Park. The spatial strategy and strategic policies in this plan aim to ensure that development is of a scale that is proportionate to its location and the needs of local communities. It is recognised that many key services are provided by towns outside the National Park (including Minehead, Taunton, Tiverton, South Molton, Barnstaple and Ilfracombe) and these are more appropriate locations for services such as supermarkets and hospitals, and will provide higher levels of growth in terms of housing and employment because of their size and strategic role for the area.
- 4.21. A further concern related to whether there would be a hierarchy within the list of settlements under option C. The continuation of a settlement hierarchy approach to development in the National Park is considered to be essential to ensure that development addresses the needs of a particular community and is of a level that will not harm the landscape or settlement character.
- 4.22. Option C was also criticised as an approach that would lead to increased commuting to settlements with a wider range of services, facilities and employment. Whilst this may have some merit, the converse is also true, that in allowing development that addresses local needs may also help to limit commuting where local people are working in the vicinity. Local need affordable housing has generally been inhabited by people already living in Exmoor communities either in unsatisfactory accommodation or as hidden households where adults are still living with their parents.
- 4.23. It was also suggested that some of the proposed settlements listed under Option C should be omitted including Martinhoe, Countisbury and Selworthy. Although it is recognised that the majority of surrounding land, and a number of properties particularly within Selworthy and Countisbury are owned by the National Trust (Selworthy in particular has a significant appeal to visitors), it is considered that the measures set out in policy GP4 in addition to other policies in the plan will ensure that opportunities to reuse existing buildings are the first consideration and any new build development should reflect the form and character of the settlement and not harm the landscape, wildlife and historic environment.

SUSTAINABILITY APPRAISAL (SA) OF THE STRATEGIC OPTIONS

- 4.24. The inclusion of a range of smaller settlements within the settlement hierarchy⁵⁴ scored positively for a range of sustainability topics including ‘community and wellbeing’, ‘economy and employment’, ‘housing’ and ‘land’ compared to the alternative strategic options A and B. In areas where option C scored negatively in areas such as landscape, transport and climate change mitigation, it is considered that the safeguards set out in the spatial strategy (GP4) and other policies in the Local Plan will alleviate many of the concerns raised including:
- a) Possible increase in the need to travel for jobs and services;

⁵² Kentisbury added subsequently as a settlement which met the criteria given further consideration following consultation on Strategic Options

⁵³ Rockford has been deleted from the list of settlements in Table 4.1 due to the considerable constraints the settlement has for further development (flood risk and proximity of internationally important habitat)

⁵⁴ Sustainability Appraisal of the Local Plan Vision & Objectives, General Policies and Strategic Options Consultation (November 2011)

- b) Increase in the range of settlements with potential impacts arising from new development on biodiversity, vulnerability to flooding, character of the settlements, landscape and the capacity these additional settlements have to accommodate new development.
- 4.25. In terms of including a wider range of settlements, to address concerns raised through the consultation and in the SA it was considered appropriate therefore to retain a settlement hierarchy whereby the defined settlements are split into distinct categories and in turn the type of development acceptable in the settlement is specified for each category. Although the Your Future Exmoor issues and options demonstrated that most people were in favour of treating all settlements the same rather than distinguishing between them, the inclusion of the additional settlements has meant that the settlement hierarchy approach is an appropriate policy measure to ensure that these smaller communities and their landscape setting are conserved and enhanced whilst providing limited development opportunities to help sustain their communities over the long term.

SEQUENTIAL APPROACH

- 4.26. Due to the dispersed rural settlement pattern on Exmoor there is a scarcity of brownfield or previously developed land and buildings in the National Park. However, there has historically been a high percentage of housing delivered on previously developed sites mostly through the conversion of existing buildings⁵⁵. The re-use of traditional agricultural buildings is considered to be greenfield development, but it recognised that such buildings can add to the important resource of existing redundant or under-used buildings within the National Park that may be appropriate for a range of future uses.
- 4.27. New build development within the open countryside is restricted to where it is considered to be essential to the operation of a rural land-based business. The re-use of existing buildings (particularly traditional buildings) provides greater flexibility in terms of the uses considered acceptable in the open countryside where new build development would not otherwise be permitted. Not only does this approach provide a use for those redundant buildings that are well-related to an existing building group (i.e. a farmstead or hamlet), but also utilises embodied energy within existing resources, and ensures that Exmoor's landscape is conserved and enhanced.

SOCIAL WELL-BEING

- 4.28. The aim of the spatial strategy is to ensure that Exmoor's settlements are socially cohesive and equitable by maintaining and creating balanced and mixed communities. Opportunities to be in closer proximity to services and jobs and maintaining social networks are improved through increasing the range of settlements where new development is considered to be acceptable. The social sustainability of communities should not be underestimated in dispersed rural areas and allowing for new development provides opportunities for friends and families to live in close proximity and support each other. In small communities even one or two affordable homes can enhance their long term sustainability and have a positive outcome for those who live and work there.
- 4.29. Some of the Rural Communities have strong long-standing community links with surrounding farmsteads, such as Twitchen, Hawkridge, Oare and Heasley Mill, which are significant in terms of supporting the 'sense of community', not just in hard terms such as number of facilities, but through social gatherings and events that help to define the community and key linkages within it. Other communities are connected through a common characteristic such as a key landowner that may own much of the surrounding land and some properties, including Selworthy and Porlock Weir, which influences and defines the community that lives there.

POLICY SAFEGUARDS

- 4.30. Where settlements have been able to benefit from new build development during the previous plan period, including local affordable housing and employment premises, this has not always taken place for reasons such as the size of the settlement and sparse population resulting in low overall housing need requirements. Most recent development⁵⁶ has occurred in

⁵⁵ Monitored through Annual Monitoring Reports

⁵⁶ Since the adoption of the Exmoor National Park Local Plan 2001-2011 in March 2005

settlements with larger populations and generally higher levels of housing need where sites have come forward. The needs-led approach for local affordable housing in particular has been self-regulating in the respect of new development and the capacity settlements have to accommodate it. The priority for new housing development within this Plan continues to be based on a local affordable needs-led approach and will therefore determine the overall level of housing coming forward in Exmoor's communities.

- 4.31. An assessment of landscape sensitivity⁵⁷ for those settlements identified within the adopted Local Plan 2001 – 2011 was undertaken as evidence to inform the preparation of this Plan. The assessment identified areas of low, moderate and high landscape sensitivity and the capacity each settlement has to accommodate small-scale new build housing development on greenfield sites – recognising that there is often additional capacity through the redevelopment of brownfield sites, including the reuse of buildings.
- 4.32. The additional settlements identified as Rural Communities within GP4 Spatial Strategy were not included in this study as the landscape sensitivity assessment was undertaken prior to the consultation on strategic options. It will be important to ensure that the landscape character and visual amenity of these smaller settlements is not harmed by new development. The policy approach for the Rural Communities requires that new build development within these communities meets a local need whilst the sequential approach means that opportunities to reuse existing buildings are considered in the first instance. The safeguards in the Local Plan policies will ensure that the impact of any proposed development in these locations will be carefully considered.
- 4.33. There may be circumstances where it is considered that a proposed development may exceed the capacity of a settlement and applicants are therefore encouraged to contact the National Park Authority at an early stage. Where landscape capacity is likely to be an issue the National Park Authority will require that applicants should demonstrate that alternative means of delivering the development have been investigated such as, that the need for the development could be achieved in another way e.g. by utilising brownfield land or existing buildings within a settlement including a nearby settlement through extant permissions for the type of development proposed. If there are no clear alternatives to the proposal and it is considered that capacity will be exceeded to the extent that there are likely to be adverse impacts including on landscape character (CE-S1) and/or the settlement character and form then the proposal is likely to be refused. Other potential constraints to be considered in terms of new development in settlements include wildlife (CE-S2) and historic environment (CE-S4) designations and areas of flood risk (CC-D1).
- 4.34. Development proposals, particularly on greenfield sites should reflect the form and character of the settlement, and in terms of location the traditional compact form of many of Exmoor's settlements. It therefore is unlikely to be appropriate to reinforce more recent patterns of development such as 'ribbon development' that have not been as successful in conserving or enhancing the historic settlement form and pattern.

SETTLEMENT HIERARCHY

- 4.35. **Local Service Centres:** These settlements provide the most extensive range of services in one place and are therefore most suitable, in principle, for new development to consolidate employment and services to help address the needs of the National Park as a whole and the local community. Nevertheless, development should be of a scale that does not harm their form and character. It is important to remember that Exmoor's Local Service Centres are not any larger than many villages elsewhere in Devon and Somerset, and it is only because of their isolation and/or the extent of the surrounding areas they serve that such a wide range of services has been sustained. The influence of tourism on Exmoor also provides a retail boost for the area and potentially influences the type and scale of shops and what they offer⁵⁸.
- 4.36. **Villages:** The settlements identified as Villages have a number of services and facilities, although not the same level of as the Local Service Centres. They also have a significant number of buildings and act as focal points for people living across Exmoor. Some of the villages and surrounding communities function collectively by sharing their facilities. Some development in the 'Villages' will help maintain or enhance their communities by providing for

⁵⁷ Exmoor National Park Landscape Sensitivity Study 2013

⁵⁸ Quantitative Needs Assessment – West Somerset Council and Exmoor National Park Authority 2011 (GVA & C4G)

the diversification of the economy and to help retain and enhance key services and facilities (which are often vulnerable to closure), and to address the housing needs of local communities.

- 4.37. **Rural Communities:** These smaller communities have at least one key facility⁵⁹. Providing opportunities for limited new build development to address the local need for affordable housing should help to sustain these communities over the longer term. Opportunities for employment premises or other uses should be met through the change of use and/or conversion of existing buildings within the settlement, or through extension of existing business premises.
- 4.38. **Porlock Weir** was considered as an additional settlement within Option C of the consultation on strategic options for the location of new development due to the number of services and facilities it contains. As it has a number of shops and businesses, a regular bus service and other community facilities it would in other circumstances be considered as a 'Village'. However, Porlock Weir is at risk of flooding and coastal erosion over the longer term due to its coastal location and the Draft Shoreline Management Plan policy of 'no active intervention'. Owing to these constraints development at Porlock Weir should accord with CC-S2 Responding to Coastal Change. A strategy for Porlock Weir and surrounding area will be produced with the community and other relevant organisations to ensure there is a coordinated approach for the long term adaptation and relocation of buildings and other facilities.
- 4.39. The remaining area of the National Park is defined as 'open countryside' and will include isolated dwellings and buildings groups such as farmsteads and hamlets. Within the open countryside a hamlet is considered to be an established group of dwellings within a grouping of buildings that do not have local services or community facilities such as a shop, pub or village hall that define the Rural Communities. Examples include a range of places across Exmoor such as Bossington, Bury, Elworthy, Leighland Chapel, Luckwell Bridge, Nettlecombe, Rockford⁶⁰, Rodhuish, Treborough and Trentishoe. It is recognised that there are several other hamlets in the National Park and that some farmsteads are also likely to meet the same definition. However in terms of policies in the Local Plan a similar approach for both farmsteads and hamlets is used as both are located in the wider definition of the open countryside. Development is primarily allowed through the reuse of existing buildings or extensions to existing homes or businesses unless there is a demonstrated agricultural/forestry need for a new building (see GP4 Spatial Strategy clauses 3 and 4).

TABLE 4.1: SETTLEMENT HIERARCHY

Local Service Centres	Dulverton Lynton & Lynmouth	Dunster Porlock
Villages	Barbrook Bridgetown / Exton Challacombe Exford Monksilver Roadwater Timberscombe Withypool	Brendon Brompton Regis Cutcombe/Wheddon Cross Luxborough Parracombe Simonsbath Winsford Wootton Courtenay
Rural Communities	Allerford Hawkridge Kentisbury ⁶¹ Martinhoe Selworthy West Porlock	Countisbury Heasley Mill Luccombe Oare / Malmsmead Twitchen Withycombe
Porlock Weir	Porlock Weir	

⁵⁹ A shop, a pub, or a community meeting place

⁶⁰ This settlement has a public house but was not included as a Rural Community as it is constrained in terms of its capacity for new development due to areas of flood risk or the proximity of internationally/nationally important habitats

⁶¹ Kentisbury has been included within the Rural Communities as part of the settlement is located within the National Park boundary. This settlement was not previously consulted on through the Strategic Options consultation

- 4.40. Please refer to Section 11: Exmoor’s Settlements for details and inset maps relating to individual settlements within the hierarchy.

GP4 SPATIAL STRATEGY

1. The spatial strategy aims to ensure that communities across the National Park continue to thrive so that they are economically resilient, environmentally sustainable, socially mixed and inclusive. To facilitate sustainable development across the National Park, development proposals should accord with the spatial strategy.
2. Development proposals should demonstrate that opportunities to utilise the following sites have been explored before proposing to develop other greenfield sites:
 - i. Brownfield sites with a low environmental value that are well related to existing buildings in the defined settlements (Table 4.1)
 - ii. The re-use of existing buildings associated with an established building group across the National Park (CE-S5 and CE-S6)
3. Development within the National Park is considered to be acceptable in principle and where it is otherwise in accordance with other specific policies in this plan it:
 - a) Is essential for the operation of rural land-based enterprises
 - b) Relates to recreation and tourism development that promotes the understanding and enjoyment of Exmoor
 - c) Involves the conversion and change of use of existing buildings for business uses, visitor accommodation, residential institutions, and homes that address the housing needs of local communities
 - d) Forms an extension to existing business premises
 - e) Replaces an existing dwelling
 - f) Is regarded as householder development including opportunities for home-based businesses
 - g) Relates to essential utilities infrastructure and renewable energy requirements
 - h) Facilitates the small-scale extraction of building stone
4. Within the open countryside, the focus of any new build development will be on improving the sustainability of rural land-based businesses.
5. For the defined settlements listed in Table 4.1, no development boundaries will be drawn. Development proposals should ensure that the scale of development is proportionate to the settlement size and reflects the capacity of each settlement to accommodate new build development without adversely affecting the landscape, wildlife and historic environment, through positively reflecting the surrounding landscape character, settlement form and building density and avoiding areas at risk of flooding. Where the capacity of a settlement to accommodate a particular development is in doubt then it should be demonstrated that alternative options have been considered to accommodate the level of development that may be permitted.
 - a) **Local Service Centres:** Development should strengthen the role of the Local Service Centres to sustain and improve the wide range of services and facilities to serve the needs of the settlement and surrounding communities, address an identified local need for housing and improve employment prospects for the local area. New build development will be acceptable in principle where it is well-related to existing buildings in the settlements for local need affordable housing, business premises and community services and facilities.
 - b) **Villages:** Development will contribute to and provide opportunities to address locally identified needs for housing and employment and sustain core services and facilities within these communities. New build development will be acceptable where it is well-related to existing buildings in the settlements for affordable housing, business premises and community services and facilities.

....continued

- c) **Rural Communities:** Within the rural communities new build development will only be considered to be acceptable in relation to the provision of local need affordable housing that addresses the needs of the parish area within the National Park. New build housing schemes that require cross subsidy through 'principal housing' or 'specialist housing' will not be permitted. Opportunities to address locally identified needs for employment will be met through the reuse of existing buildings or the extension of existing business premises in accordance with Policy SE-S3.
- d) **Porlock Weir:** a community considered to be at risk of coastal change. Any proposals for new development will need to demonstrate that they are consistent with the principles in Policy CC-S2 Responding to Coastal Change for the replacement of development through relocation and measures for the management of buildings/facilities to be lost.

SECURING PLANNING BENEFITS

CONTEXT

PLANNING OBLIGATIONS

- 4.41. All development has some impact on land and facilities. Planning obligations, conditions and community levies can be used to ameliorate the effects of such impacts. Planning conditions can be used to make development ~~acceptable~~ proposals acceptable which might otherwise be unacceptable through planning control, or, where this is not possible, planning obligations can be used to come to a mutual agreement with the applicant. National policy ~~provides~~ states that planning obligations should only be sought where they meet all of the following tests:
- they are necessary to make the development acceptable in planning terms;
 - directly related to the development; and
 - fair and reasonably related in scale and kind ~~of~~ to the development.
- 4.42. In addition to planning conditions and obligations, the Government has ~~recently~~ introduced a Community Infrastructure Levy (CIL) which can be used by Planning Authorities to secure a levy from development towards local community infrastructure. However, it is not obligatory. In Exmoor National Park, a ~~community infrastructure levy~~ CIL could ~~currently~~ be used for improvements and additions to, for example: sporting and recreational facilities, open spaces, schools and other educational facilities, medical centres, ~~roads and other~~ transport infrastructure facilities and flood defences. Much ~~of such~~ infrastructure is owned and/or managed by town and parish councils, ~~adjoining the~~ district councils and Devon and Somerset County Councils. The need for a ~~Community Infrastructure Levy~~ CIL is established through a live document known as the Infrastructure Delivery Plan which sets out ~~the~~ existing infrastructure deficiencies and what is required for the future.
- 4.43. A ~~community infrastructure levy~~ CIL is generally charged ~~largely~~ on development that is over 100sq metres. Exmoor National Park Authority has relatively limited development, particularly ~~that~~ of 100sq metres or above. However, it is recognised that such development still has an impact on local infrastructure and the needs of local ~~sustainable~~ communities. Given that ~~government policy is evolving on this~~ the issue is evolving, and, given the limited level and scale of development in Exmoor National Park and that much of the local infrastructure is owned and/or managed by other local authorities, ~~Exmoor the~~ National Park Authority will need to work with partners and review periodically and as appropriate its position on the ~~community infrastructure levy~~ CIL, including consideration of the benefits of a CIL and its impact on the viability of development in the National Park. ~~periodically and as appropriate.~~

GP5 SECURING PLANNING BENEFITS – PLANNING OBLIGATIONS

In order for development to take place without harm to and to ensure that it conserves and enhances the National Park and its special qualities, within infrastructure capacity interests, or in accordance with policy, it may be required that development be accompanied by limitations or contributions that go beyond those that can be secured by planning conditions. These may be in the form of planning contributions or a community infrastructure levy if applied and considered appropriate. The need for a levy will be reviewed periodically through the Infrastructure Delivery Plan.

ACHIEVING ENHANCEMENT OF THE NATIONAL PARK

- 4.44. The first purpose of National Parks is the conservation *and enhancement* of their natural beauty, wildlife and cultural heritage. As well as ensuring new development *conserves* local landscape and built character, opportunities for *enhancement* measures are also needed to fully meet National Park purposes.
- 4.45. The National Park Vision highlights the conservation and enhancement of Exmoor National Park's natural beauty, wildlife and cultural heritage including its archaeology, historic settlements, buildings and features and recognises the need to address intrusive structures. Changes, mainly as a result of external factors such as the availability nationally of financial incentives, have contributed to a gradual erosion of Exmoor's distinctive character, including from the demand for the re-use of traditional former agricultural buildings, for extensions and alterations to dwellings and by the use of standardised building techniques and materials.
- 4.46. To maintain the distinctive character, quality and local distinctiveness of Exmoor National Park's landscape and settlements, careful intervention and focus is therefore needed to ensure high quality new development and to respond to opportunities for enhancement.
- 4.47. Proposals which are justified on the basis of enhancement will be required to demonstrate an overall benefit and be closely related to the natural beauty and/or wildlife and cultural heritage of the area, its special qualities and valued features. Considerations will include the quality of the design and its contribution to the local distinctiveness, character and appearance of the area and be consistent with other Plan policies. Other benefits to the community are dealt with in other policies in this Plan such as those for new housing for local communities (Section 7) and for the economy and employment (Section 8) which includes the approach to safeguarding existing employment land and buildings.
- 4.48. Planning decisions and other tools may enable opportunities to remove or treat intrusive or other undesirable structures or features. Such works must be carried out sympathetically so as not to harm the National Park and its special qualities, the locality and site.
- 4.49. Policy GP6 sets out six criteria to underpin opportunities for the enhancement of the National Park and reflecting the first statutory purpose. It takes forward objectives in the Plan including to:
- a) ensure that Exmoor's moorlands remain open, remote and relatively wild in character; that views are preserved;
 - b) conserve and enhance Exmoor's landscapes as living working landscapes that remain predominately free from intrusive developments;
 - c) ensure that the built tradition, character, distinctiveness and historic character of Exmoor's settlements, buildings, farmsteads, landscapes, archaeological sites and monuments is conserved and enhanced and that the cultural heritage of Exmoor is protected through the careful management of development.
- 4.50. Opportunities and proposals must demonstrate that they constitute meaningful enhancement of the National Park's natural beauty, wildlife and/or cultural heritage to accord with the Policy. Examples of enhancement could include treatment or removal of structures including masts or poles/overhead wires or modern redundant buildings including large sheds which are considered to have a detrimental and/or cumulative impact on the National Park landscape. In

achieving enhancement that accords with clauses 1 to 5 of Policy GP6, opportunities which arise for the enhancement of natural resources and land should also be taken. This includes contaminated sites and the removal of pollutants.

- 4.51. Occasionally the National Park Authority may consider that material planning considerations demonstrate that a scheme can be accepted as an exception to policies in order to achieve a significant overall benefit to the National Park, for example, the development at Cutcombe which enabled the replacement of the livestock market was permitted as a departure to policies in the previous Local Plan.
- 4.52. In order to help to ensure that new development conserves and enhances the National Park and its special qualities, development briefs and appraisal documents may be used. From time to time, larger, more complex opportunities for enhancement may arise which require a development brief to bring together enhancement and socio economic opportunities and which will deliver the most sustainable outcome for the community. These will be used selectively and only where there is a clear need to bring forward development and/or evidence that interest in a site has been discouraged by a lack of clear site specific guidance.
- 4.53. Other policies in this plan also include specific criteria for opportunities for enhancement.

GP6 ENHANCING THE NATIONAL PARK'S SPECIAL QUALITIES

- 1. Opportunities for enhancing the special qualities and valued features of the National Park will be identified and responded to.**
- 2. Proposals to enhance the National Park will need to demonstrate a significant overall benefit to the natural beauty, wildlife and cultural heritage of the area and that they do not undermine the achievement of other Plan Policies.**
- 3. Where development is permitted, a design and, where appropriate, landscaping works will be sought that conserve and enhance the landscape, character, appearance, distinctiveness and setting of the area and locality and contribute to achieving biodiversity objectives.**
- 4. Opportunities will be taken to enhance the National Park by the treatment or removal of intrusive structures or features in a way which conserves the special qualities or valued features of the site and its surroundings.**
- 5. Development in settlements necessary for the treatment, removal or relocation of non-conforming uses to an acceptable site, or which would enhance the special qualities of the National Park may be permitted. In such cases a site brief may be necessary to achieve the best mix of uses to secure the conservation and enhancement of the National Park and the most sustainable outcome for the community.**
- 6. Where proposals for the enhancement of the National Park in accordance with Clauses 1-6 of this policy are accepted, opportunities which arise for the enhancement of natural resources, land (including contaminated land) and access/transport will be encouraged.**

5. CONSERVING AND ENHANCING EXMOOR

EXMOOR'S LANDSCAPE

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

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

PURPOSE OF THE POLICIES

5.1. Policy CE-S1 sets out the approach to ensure that the natural beauty of Exmoor National Park is conserved and enhanced while CE-D1 seeks to safeguard the National Park's Dark Sky Reserve status and reduce light pollution.

INTERNATIONAL AND NATIONAL POLICY CONTEXT

5.2. 'The European Landscape Convention (ELC)⁶² defines landscape as "an area, as perceived by people, whose character is the result of natural and/or human factors". One of the key aims of the ELC is to integrate landscape into planning policy, recognising that landscape is a fundamental component of people's surroundings.

5.3. National policy⁶³ emphasises the need to give great weight to conserving and enhancing and scenic beauty, of National Parks⁶⁴. The character of the undeveloped coast should also be maintained to protect and enhance its distinctive landscape particularly in areas defined as Heritage Coast⁶⁵ (see also CC-D2 Coastal Development). Policies should also protect areas of tranquillity and intrinsically dark skies.

5.4. The National Parks Circular recognises the significance of the living, working landscapes of the National Parks and that these unique and beautiful landscapes have been influenced over centuries by land management activities such as farming and forestry. The protection and enhancement of the landscape and dark skies are central to developing the local economy and sustaining communities whilst the diversity of the landscape character is defines the quality and distinctiveness of the place. The ELC principles are particularly promoted in addressing planning and management of National Parks.

CONTEXT

5.5. The panoramic views, skylines and valued dark night sky within the Exmoor National Park and the wild, remote and tranquil character of the open moorland, woodland and the undeveloped coast are important landscape qualities that are valued by local communities and visitors alike. Exmoor's natural beauty and landscape are fundamental reasons for its National Park designation. Ensuring that the quality of the landscape is conserved and enhanced has positive implications for the local economy – particularly tourism. The relatively low level and small-scale nature of development within the National Park has limited pressure on the landscape which helps to maintain its overall character.

LANDSCAPE CHARACTER ASSESSMENT

5.6. Landscape Character Assessment (LCA) is embedded in the spatial planning process because it is central to the wider appreciation and understanding of landscapes and connection between people and place. Local planning authorities can utilise LCAs to inform policy and decisions regarding the location and design of development and the capacity of the landscape to accept change; with the aim of reinforcing local distinctiveness.

⁶² The UK ratified the European Landscape Convention (ELC) in 2006

⁶³ National Planning Policy Framework (NPPF) 2012 Department for Communities and Local Government (DCLG)

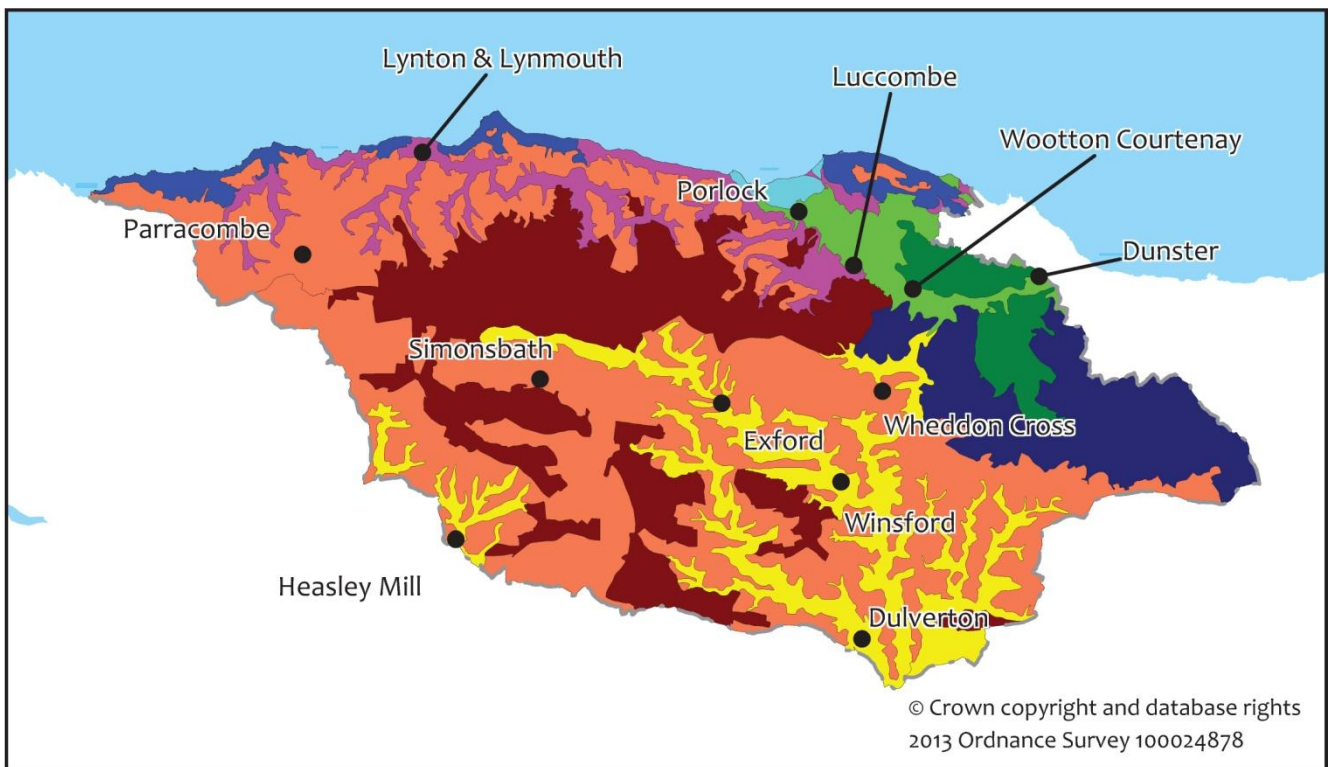
⁶⁴ Para 115 NPPF 2012 DCLG

⁶⁵ Para 114 NPPF 2012 DCLG

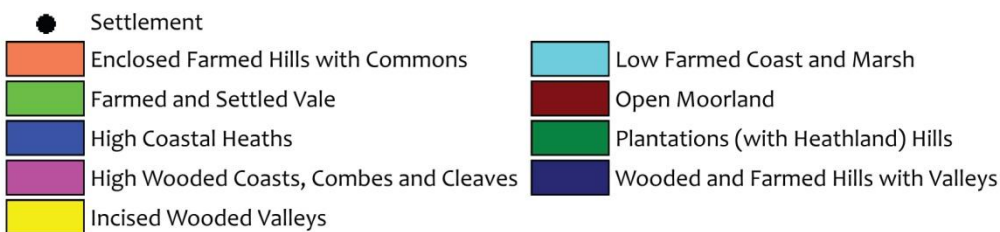
- 5.7. The Exmoor National Park Landscape Character Assessment provides an evaluation of the Exmoor’s landscape character areas and types to provide a robust landscape framework which can be used for key spatial policy and strategy areas. The LCA identifies current key and secondary issues that are recognised as having (or likely to have) detrimental impact on the landscape, and associated objectives which would benefit visual amenity and condition, thus improving landscape character.
- 5.8. The process of landscape characterisation on Exmoor has identified 9 separate character types and 26 character areas within those types – see map 5.1 below.

LANDSCAPE CHARACTER TYPES

- | | |
|--|--|
| A: High Coastal Heaths | F: Enclosed Farmed Hills with Commons |
| B. High Wooded Coast, Combes and Cleaves | G: Incised Wooded Valleys |
| C. Low Farmed Coast and Marsh | H: Plantation (with heathland) Hills |
| D. Open Moorland | I: Wooded and Farmed Hills with Combes |
| E. Farmed and Settled Vale | |



Landscape Character Types



Map 5.1 Landscape Character Types

5.9. The appraisal of the landscape character types and areas exhibits a significant variety of landscape scene within a relatively small area – this diversity of landscape informs Exmoor’s character. However, due to the relatively limited extent of the National Park, these landscapes can be sensitive to change, including development affecting the setting of the National Park. The Exmoor Landscape Action Plan⁶⁶ takes forward recommendations from the LCA for each landscape character type, and identifies overarching quality objectives and specific actions for each of the landscape issues.

⁶⁶ The Exmoor Landscape Action Plan 2011

- 5.10. The National Park forms almost 50% of the National Character Area of Exmoor⁶⁷. The 2012 update of this National Character Area highlights four statements of environmental opportunities that relate to landscape and wider environmental and cultural qualities of the area. Specific aspects of these opportunities include protecting, managing and enhancing the highly distinctive and diverse landscape including large areas of open ‘wild’ moorland, Atlantic coast, and deep wooded combes, and reinforcing the distinctive character of the mixed farmed landscape. Extreme tranquillity and dark skies are particularly identified as inspirational qualities of the area.

LANDSCAPE RESILIENCE

- 5.11. The landscape character approach to future development and land use change will help to create resilience to ensure that landscapes are effective at mitigating and/or adapting to the effects of climate change (CC-S1 Climate Change Mitigation and Adaptation). Opportunities to create landscape resilience can provide additional benefits for biodiversity, the economy, recreation and tourism through appropriate management, restoration, and expansion of landscapes and habitats to other ecological networks.
- 5.12. Forests and woodlands are considered to be significant in achieving a resilient and coherent ecological network across England. The National Park Circular (2010) and Natural Environment White Paper⁶⁸ aim for an increase in the area of woodland in National Parks and England as a whole, better management of existing woodlands and a renewed commitment to conserving and restoring ancient woodlands. **New and existing** woodlands can provide wildlife habitats, green space for people to use and enjoy (CE-S3 Green Infrastructure), help to mitigate and adapt to the future changing climate (CC-S1 Climate Change Mitigation and Adaptation) through carbon sequestration and renewable source of wood fuel, as well as a providing a supply of local timber (CE-S7 Design & Sustainable Construction Principles).
- 5.13. Other opportunities for carbon sinks (using natural carbon stores) other than planting woodland, include managing and restoring moorland and in particular areas of blanket bog or mire⁶⁹. A significant area of moorland has already been rewetted through blocking ditches with dams made from bales of natural moorland vegetation, wood and peat and further damaged peatland sites require assessment and negotiations with landowners before restoration can take place⁷⁰.

SIGNIFICANT LANDSCAPE & SEASCAPE ATTRIBUTES

- 5.14. Within the National Park, including areas with particular landscape and seascape attributes, there is a strong presumption in favour of the conservation and enhancement of their natural beauty and contribution to overall landscape and seascape character
- 5.15. **Section 3 Land:** Section 3 of the Wildlife and Countryside (Amendment) Act 1985 requires National Park Authorities to prepare a map of any areas of “mountain, moor, heath, woodland, down, cliff or foreshore” where these areas are considered particularly important to protect. The three main categories of Section 3 Land are defined on the 1990 Section 3 Conservation Map and identified on the Proposals Map as: moor and heath, woodland, and cliff and foreshore. Some Section 3 land will have additional designations in recognition of its biodiversity importance at both an international and national level.
- 5.16. **Seascape and Heritage Coast:** Seascape is defined as ‘*landscapes with views of the coast or seas, and coasts and the adjacent marine environment with cultural, historical and archaeological links with each other*’⁷¹. Exmoor has some of the most scenic, unspoilt stretches of coastline in England, that is also considered as part of its spectacular seascape. Many areas of high coastal heath and woodland are in as natural a condition as possible and are important areas for wildlife. The whole coastline was defined as Heritage Coast in 1991 (see Map 5.2). The national purposes of Heritage Coasts are compatible with the statutory purposes for National Parks and also reflect the socio-economic duty.

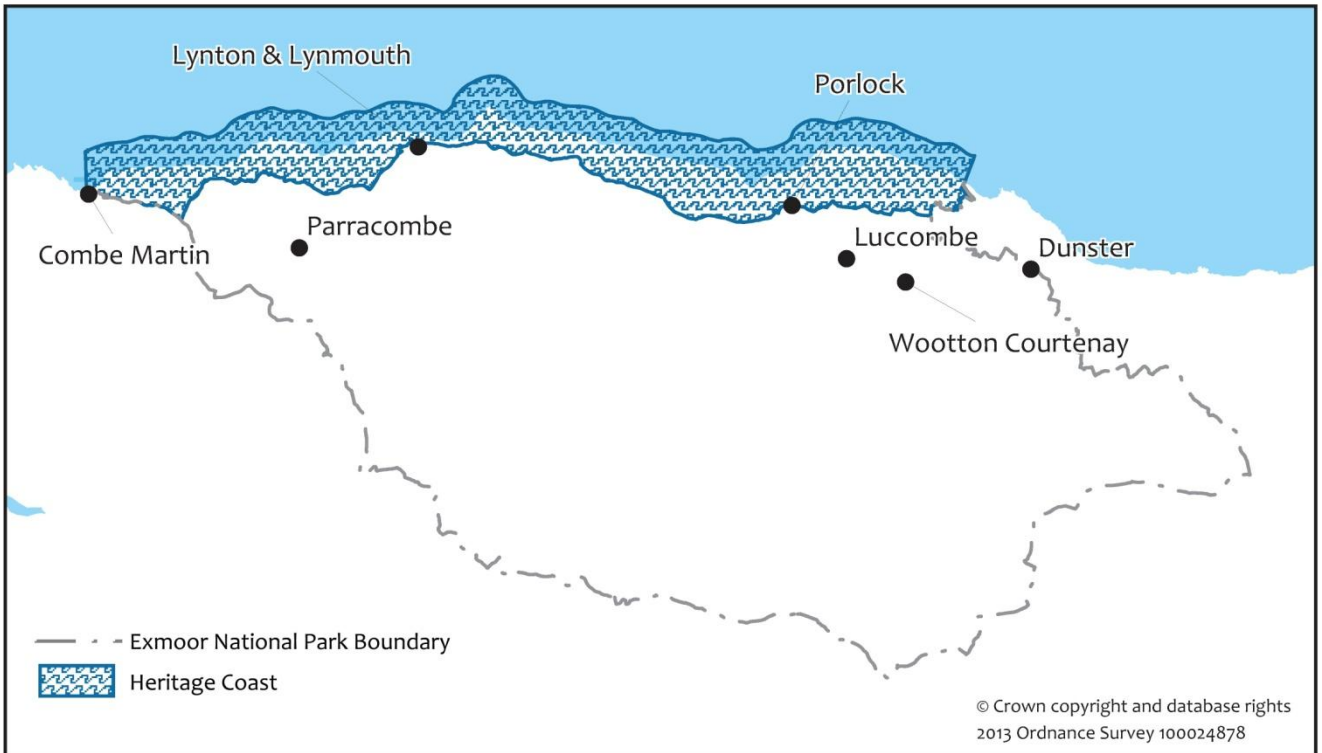
⁶⁷ National Character Area profile 145. Exmoor (August 2012) – Natural England

⁶⁸ The Natural Choice: securing the value of nature – Defra 2010

⁶⁹ <http://www.exmoor-nationalpark.gov.uk/environment/moorland/mire-project>

⁷⁰ The Mires on the Moors Project is a landscape scale project based on a partnership approach to restore areas of upland blanket bogs and mires on Exmoor and Dartmoor. The project will continue to help to re-establish natural flows of streams and rivers, improve their ecology and increase the resilience of the ecosystem to the effects of climate change – building on the success of the Exmoor Mires Project

⁷¹ UK Marine Policy Statement March 2011



Map 5.2 Exmoor National Park Heritage Coast

- 5.17. Currently there is no statutory protection for the offshore areas from Exmoor's coastline; however recommendations made to Defra for Marine Conservation Zones (MCZs) include Bideford to Foreland Point⁷². The Secretary of State for the environment will have the final decision on the designation of MCZs – these together with other marine protected areas will make up an ecological network to achieve good environmental status. Marine Plans will help integrate marine and land planning, contributing to vibrant coastal communities and consideration of cultural heritage, seascape and local environmental quality⁷³. The Authority supports the formation of marine protected areas (including MCZs) and will work with the marine planning authority to ensure that Exmoor's high quality seascape is maintained.
- 5.18. **The Landscape Setting of Exmoor's Settlements:** The setting of Exmoor's towns and villages is a significant aspect of their overall character and form. A Landscape Sensitivity Study has been undertaken for settlements within the National Park to provide an assessment of the capacity of settlements to accommodate small-scale housing development within or adjoining the existing settlement whilst conserving landscape character. This study has taken into account the landscape value and sensitivity of each settlement in its wider setting to provide an informed judgement in relation to future capacity (Section 11 Exmoor's Settlements).
- 5.19. **Historic Field Patterns & Boundary Features:** The historic environment is an important component of landscape character (CE-S4 Cultural Heritage) as defined by human activity. Key components of the historic landscape character of Exmoor are the sunken lanes and intricate field patterns that surround many small hamlets and villages. Hedgerows are important features of narrow rural roads, lanes and some rights of way – channelling and framing views of the wider landscape; often with significant trees (standards) which are a strong feature of many hedges and a key aspect of their character. Exmoor has around 4000km of hedgerows and boundary features. Hedgerows, particularly the ancient mixed species hedge banks and the typical beech hedge banks on the farmed hills and vale of Exmoor, are a significant landscape characteristic⁷⁴ and form a strong landscape pattern. Hedgerows denote the irregular pattern of field enclosure during the 18th – 21st centuries, whilst some of the boundaries on higher ground are bounded by stone-faced beech

⁷² Finding Sanctuary: Final Report and Recommendations 7 September 2011

⁷³ Para 2.5.7 UK Marine Policy Statement 2011

⁷⁴ Exmoor National Park Landscape Character Assessment 2007 - see Guidance Note:

http://www.planningportal.gov.uk/uploads/1app/guidance/guidance_note-hedgerow_removal_notice.pdf

hedgebanks, with dry stonewalling across more open areas. The built character of many settlements in the National Park is enhanced by boundary treatments such as traditional stone walling, the style of which varies according to the type of local stone available.

- 5.20. Important hedgerows (as defined by the Hedgerow Regulations)⁷⁵ are generally protected so they cannot usually be removed or breached without consulting the planning authority. Agri-environment schemes have also contributed towards the long term management of hedgerows across the National Park. Development should conserve boundary features which contribute to landscape character, and utilise such features to ameliorate and enhance any landscape works as part of the proposal.
- 5.21. **Important Trees, Tree Groups & Orchards:** Trees and woodland are significant features of the Exmoor landscape, and one of the most valued aspects of the National Park. Most woodland areas have a range of protection measures through designations as Special Areas of Conservation, Sites of Special Scientific Interest, County Wildlife Sites (CE-S2 Biodiversity) or Section 3 woodland. Development proposals that may affect important trees or tree groups should have regard to the British Standards Institute publication BS5837:2005 Trees in relation to construction⁷⁶.
- 5.22. Veteran trees, orchards, parklands, copses and individual trees are distinctive landscape features in their own right and are often important habitats. Over 1600 veteran trees have been recorded on Exmoor, and proposals for development or change of land use should ensure that no harm is caused to these trees. Veteran trees are often found in more formally designed parkland and wood pasture landscapes, although they are also found throughout the countryside.
- 5.23. Some individual trees and tree groups are formally protected by Tree Preservation Orders (TPOs) or if they are located within a Conservation Area. Any proposed works to trees protected by TPOs usually require consent from the planning authority, whilst six weeks prior notice is required for works to trees within a Conservation Area to enable the Authority to consider whether a TPO should be made⁷⁷. TPOs can be made by the Authority where it is considered that there are threats to individual trees, groups of trees or woodlands which are considered to be in the interests of amenity.
- 5.24. Traditional orchards are a landscape feature of lower farmland areas within the National Park, particularly within the Vale of Porlock. Many orchards and remnants of orchards are associated with settlements and farmsteads, which reflect their past significance to the local economy – they are therefore not only important landscape features, but also their cultural interest and contribution to local amenity and biodiversity. A comprehensive orchard review has been undertaken to identify and assess the importance of orchards in the landscape. This evidence has informed the areas of orchard defined on the Proposals Map which will be protected from development proposals that would impact on their landscape value.
- 5.25. **Rivers and River Corridors:** Rivers and their corridors in the National Park are key characteristics of the Incised Wooded Valleys and High Wooded Coast, Combes and Cleaves landscape character areas. Flat, improved pastures define much of the floodplain area within river corridors, and in other areas the woodland descends to the river banks. Many of Exmoor's settlements are located in valley bottoms, at river crossings – where the river is a defining feature of the settlement character.
- 5.26. It is important that new development proposals take account of the impact on the character and natural processes of rivers and streams and where possible addresses the impact of concentrated recreational activity (RT-D10).

LANDSCAPE CONSIDERATIONS

- 5.27. Policy CE-S1 Landscape Character explains the approach to protecting and enhancing the natural beauty of Exmoor National Park through the integration of the Exmoor National Park Landscape Character Assessment⁷⁸ to give greater clarity for future development and land use change, with particular regard to protecting Exmoor's dark night sky.

⁷⁵ The Hedgerow Regulations 1997 - A Guide to the Law and Good Practice DEFRA

⁷⁶ www.bsigroup.co.uk

⁷⁷ Protected Trees: A guide to tree preservation procedures DCLG – April 2012

⁷⁸ Exmoor National Park Landscape Character Assessment 2007

- 5.28. Consultation⁷⁹ has highlighted the importance of protecting Exmoor's landscapes from intrusive development and the cumulative impact of man-made structures. Small-scale, incremental change can have a detrimental impact on landscape character; such as farm fragmentation, equestrian development and game bird rearing and shooting – the increase in these particular pressures and future pressures from further telecommunication infrastructure, renewable energy technologies and energy crops are trends causing concern on Exmoor, and in areas surrounding the National Park. The National Park Authority will work with partners and neighbouring authorities to ensure Exmoor's setting, including views into and out of the National Park are preserved and protected from intrusive development.
- 5.29. In terms of proposals for vertical structures (e.g. wind turbines, telecommunication masts etc) the important aspects are limiting the visibility of such structures in the landscape through visual integration such as grouping with surrounding features with strong vertical prominence, such as trees and existing buildings – the long term management of any planting which helps to screen and integrate these structures is essential. The surrounding landform is also significant to ensure that such structures do not break the skyline from sensitive view points such as access land and rights of way. The material specification, colour and other aesthetic qualities including design can help to minimise visibility (for further detail on these specific structures see policies CC-D4 Small Scale Wind Turbines and AC-D4 Radio and Mobile Telecommunications Infrastructure).
- 5.30. Equestrian development, such as exercise arenas, can also have significant landscape impact unless particular care is taken to ensure it is well related to existing buildings, well screened by existing features, and the level of excavation required is minimal. The colour of surfacing materials and design of boundary treatments also need to be carefully selected to minimise the visual impact of such equestrian facilities (see RT-D11 Equestrian Development).
- 5.31. The Authority has liaised with both highway authorities (Devon and Somerset County Councils) to develop a more sensitive approach to signage and road management on Exmoor (AC-S2 Transport Infrastructure). The Authority has also worked with infrastructure organisations to facilitate undergrounding of overhead power and telecommunication lines for certain areas. Funding is available to underground electricity lines in protected areas; this is a fund for the AONB's and National Parks in the South West and will focus on iconic sites. Exmoor has already benefitted from this fund through undergrounding schemes within the Dulverton conservation area, Hawkcombe and Porlock Marsh (AC-D5 Fixed Line Transmission Infrastructure).

⁷⁹ Your Future Exmoor (YFE) consultation events January – March 2010

CE-S1 – LANDSCAPE CHARACTER

- 1. The high quality, diverse and distinct landscapes and seascape of Exmoor National Park will be conserved and enhanced through using a character-based approach.**
- 2. Development proposals should be informed by, and complement the distinctive characteristics of the landscape character types and areas identified in the Exmoor National Park Landscape Character Assessment (LCA); taking into account the visual impact of the development in its immediate and wider setting. Proposals which are considered to be significant in terms of scale and/or impact should provide a professional landscape appraisal as part of the application submission.**
- 3. Where there is opportunity, proposals should seek to conserve, enhance, and restore important landscapes and landscape features as identified in the LCA, including minimising existing visual detractions.**
- 4. Where landscaping works are required, conditions will be attached to protect important landscape features and where appropriate to require replacement or additional features.**
 - a) Development proposals should also have regard to, and be appropriate in terms of impact with the conservation of significant landscape and seascape attributes including:**
 - b) The natural beauty of areas of moor, heath, woodland, cliff and foreshore – defined as Section 3 Land on the Proposals Map.**
 - c) Exmoor’s Heritage Coast – defined on the Proposals Map.**
 - d) The landscape setting and capacity of Exmoor’s settlements which contributes to local distinctiveness and sense of place.**
 - e) The ‘dark night sky’ experience which strongly influences landscape character and sense of tranquillity within the National Park (CE-D1).**
 - f) Historic field patterns of the characteristic farmed landscape and significant boundary features such as hedgerows and stone walls/banks.**
 - g) Important trees, tree groups and orchards - including those defined on the Proposals Map.**
 - h) Rivers and their corridors.**

PROTECTING EXMOOR’S DARK NIGHT SKY

PURPOSE OF THE POLICY

- 5.32. Policy CE-D1 sets out the approach to protecting the experience of tranquillity and Exmoor’s landscape character by safeguarding the Dark Sky Reserve status of the National Park and seeking to reduce light pollution.

NATIONAL POLICY CONTEXT

- 5.33. National policy and the National Parks Circular⁸⁰ encourage local planning authorities to take account of environmental issues such as light pollution, and the need to limit and/or reduce the adverse impact of this source of pollution on local amenity, rural tranquillity and nature conservation. The Royal Commission on Environmental Pollution (RCEP) report⁸¹ recommends that those responsible for the management of existing National Parks seek to eliminate unnecessary outdoor light and to better design and manage that which cannot be eliminated. National policy guidance⁸² supports this and states that the impact of light pollution from artificial light should be limited where it affects local amenity, intrinsically dark landscapes and nature conservation – this signifies that the policy approach should reflect Exmoor’s status as a National Park and International Dark Sky Reserve.

⁸⁰ English National Parks and The Broads: UK Government Vision and Circular 2010

⁸¹ Artificial Light in the Environment – The Royal Commission on Environmental Pollution 2009

⁸² NPPF 2012 DCLG

CONTEXT

EXMOOR NATIONAL PARK DARK SKY RESERVE

- 5.34. The remote, open landscapes of the moorland and lack of human habitation have helped to define a 'core dark sky area' within the National Park as part of the Dark Sky Reserve, which Exmoor National Park was awarded in 2011. The Dark Sky Reserve status could provide an important boost to tourism, attracting visitors to experience Exmoor's dark night sky and inspiring interest in astronomy.
- 5.35. A critical buffer zone around this core area has also been established which only includes minor settlements. The identification of these areas has informed the Lighting Management Plan that specifies appropriate lighting methods and management within the National Park (see Map 5.3 Dark Sky Core Area and Core Buffer Zone).

LIGHT POLLUTION CONTEXT

- 5.36. The Royal Commission on Environmental Pollution (RCEP) describes light pollution as the experience of light in the wrong place or at the wrong time; both the timing of illumination and the actual level of light are important factors. Light pollution is an important and avoidable consequence of poor lighting design, often exacerbated by poor installation and maintenance. The RCEP report identifies a number of forms that light pollution can take from both diffuse and point sources:
- a) **Glare:** The excessive contrast between bright and dark areas in the field of view.
 - b) **Light trespass:** Unwanted light, for example from adjacent properties and activities.
 - c) **Light clutter:** The excessive grouping of lights.
 - d) **Light profligacy:** Over-illumination which wastes energy and money.
 - e) **Sky glow:** A combination of reflected and refracted light from the atmosphere. A major effect of sky glow at night is to reduce contrast in the sky. This is the most pervasive form of light pollution and can affect areas many miles from the original light source.
- 5.37. Light pollution is also known to adversely impact on wildlife and their habitats which has been recognised by a number of research studies and reports. Since many species are already declining and are protected by legislation, this represents a further pressure on remaining populations.
- 5.38. Bats are an example of nocturnal mammals that are likely to be disturbed by the presence of external lighting and could be deterred from using established foraging areas⁸³. The Lighting in the Countryside – Towards Good Practice⁸⁴ has identified in particular, security lighting or sports floodlighting on premises, and lighting alongside river corridors and in foraging areas or near other areas of open countryside may be seriously detrimental to these particular species.
- 5.39. The Night Blight Report⁸⁵ also raises further concerns regarding poor lighting design and unnecessary external illumination, such as the waste of energy and contribution to air pollution and climate change. Ensuring lighting is appropriate for its purpose and energy efficient, will also help to reduce carbon emissions and contribute to climate change mitigation.
- 5.40. Consultation⁸⁶ demonstrated a high level of support for reducing street lighting in terms of the number of street lights, and the time they are operational. A number of smaller settlements on Exmoor have no street lighting, the National Park Authority will continue to work with the highway authorities and local communities on proposals to manage and where possible reduce lighting within streets and car parks. Devon and Somerset County Councils are both implementing part-night lighting for the public road lighting networks in their respective areas. Part night-lighting has already been implemented in Parracombe, and several other communities have expressed an interest to follow suit. Street lighting will be turned off generally between midnight and 5.30am.

⁸³ Bats and Lighting in the UK - Bat Conservation Trust 2009

⁸⁴ Lighting in the Countryside: Towards Good Practice - Main document July 1997 DoE and Countryside Commission

⁸⁵ Campaign to Protect Rural England and the British Astronomical Association May 2003

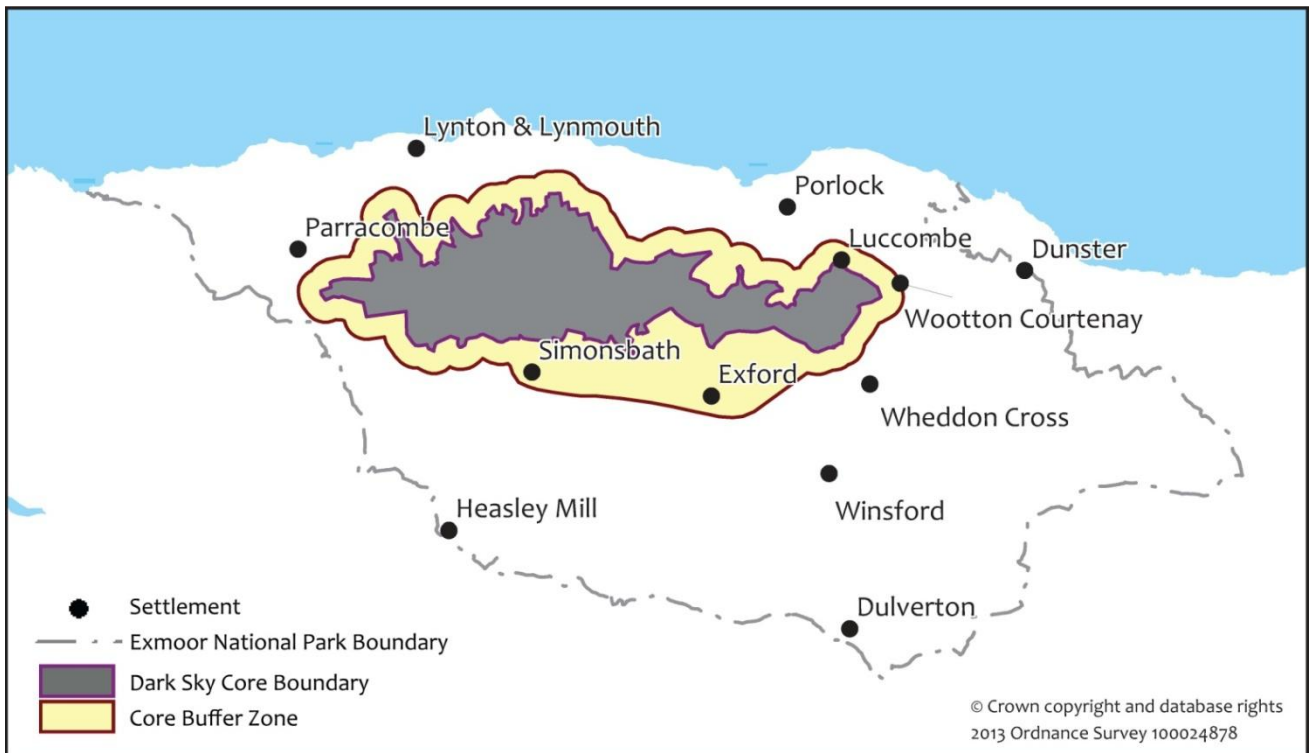
⁸⁶ YFE consultation events January – March 2010

5.41. Other forms of light pollution arise from a number of sources including: illuminating buildings, light spill from internal lighting in agricultural and other non-residential buildings, security lighting, and flood-lit areas. Any necessary new lighting associated with new development can be managed through appropriate lighting technology and restrictions on the duration of use. Where light pollution already exists, the Authority will promote the use of the Lighting Management Plan to inform the public about ways to reduce energy and use lighting more effectively.

LIGHTING CONSIDERATIONS

- 5.42. Applicants will be expected, as part of their proposals, to set out any lighting proposals and demonstrate that they accord with best practice. Planning conditions will be attached to any approval to ensure that any lighting will be appropriately designed and managed to limit impacts on local amenity, landscape character, cultural heritage, and wildlife.
- 5.43. Policy CE-D1 refers to further detailed guidance in the Lighting Management Plan which provides technical advice to inform external lighting requirements for future development and seek to manage existing external lighting with building advice from the Institute of Lighting Professionals (ILP), and with the input of Devon County Council and Somerset County Council lighting professionals. Where external lighting cannot be managed through planning conditions, the Lighting Management Plan provides guidelines for property owners and organisations responsible for other forms of outdoor lighting. These include reducing the intensity of external lighting and specifications for shielding with hoods or reflectors.
- 5.44. Where external artificial illumination can be justified in terms of meeting Lifetime Homes standards, the Code for Sustainable Homes criteria, other safety requirements or improving accessibility to community facilities – it should meet the objectives of the policy and the requirements of the Lighting Management Plan.

Map 5.3 Dark Sky Core Area and Core Buffer Zone



CE-D1 PROTECTING EXMOOR'S DARK NIGHT SKY

- 1. The tranquillity and dark sky experience of the National Park, and its status as an International Dark Sky Reserve, will be maintained and improved through seeking to reduce light spillage and eliminating all unnecessary forms of artificial outdoor lighting in the National Park by ensuring:**
 - a) The Dark Sky Core Area (as defined on the Proposals Map) is protected from permanent illumination.**
 - b) Strict controls on external lighting within the Dark Sky Critical Buffer Zone (as defined on the Proposals Map) and open countryside/areas of rural darkness including light spill from within non-residential buildings.**
 - c) Good lighting management and design throughout the National Park to reduce all forms of external light spillage, and avoiding adverse impacts on:**
 - i) the visual character of the landscape, seascape, cultural heritage and the built environment,**
 - ii) wildlife and habitats, and**
 - iii) local visual amenity and safety.**
- 2. Development proposals that involve lighting will only be permitted where it can be demonstrated that they are required for safety, security or community reasons and where the details minimise light spillage; having regard to the Lighting Management Plan guidance.**

WILDLIFE AND GEOLOGICAL CONSERVATION

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

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

PURPOSE OF THE POLICY

5.45. Policy CE-S2 sets out the approach to protecting and enhancing Exmoor's wildlife, habitats and geological diversity to improve their diversity, extent, condition and the network of habitats.

NATIONAL AND INTERNATIONAL CONTEXT

5.46. All public authorities, including Exmoor National Park Authority, have a biodiversity⁸⁷ duty which requires them to 'have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.'⁸⁸ The UK's commitment to the conservation of biodiversity is delivered through the UK Biodiversity Action Plan⁸⁹ which identifies habitats and species of principal importance and targets action for particularly vulnerable habitats and species⁹⁰. In 2010, over 190 countries reached a global agreement to take action to halt the loss of biodiversity⁹¹ recognising the importance of wildlife and ecosystems for sustaining a healthy planet and for delivering essential benefits for people. Delivery of this commitment will be guided by the Biodiversity Strategy⁹² which sets an ambition to halt overall loss of England's biodiversity by 2020 and to move to a position of net biodiversity gain in the longer term. The Government also published the Natural Environment White Paper⁹³ in response to the Lawton review⁹⁴, supporting a more integrated landscape-scale approach looking at habitats on a larger scale and creating more links and wildlife corridors between them. This will help nature to better withstand future pressures such as climate change and provide a wider context for conservation work. The Government's objective⁹⁵ is that planning should contribute to conserving and enhancing the natural and local environment, improving biodiversity⁹⁶ by minimising impacts on biodiversity and providing net gains for nature⁹⁷ and protecting geological conservation, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures⁹⁸. Biodiversity is also of value to the local economy, in terms of the important habitats and wildlife that are appreciated by people living in and visiting the area, but also in terms of the ecosystem services they provide.

CONTEXT

EXMOOR'S BIODIVERSITY ASSETS

5.47. The Exmoor Biodiversity Action Plan⁹⁹ identifies important habitats and species on Exmoor, and is intended to "increase Exmoor's biodiversity, targeting those species and habitats most valued nationally and locally, by building partnerships with others and by promoting understanding and support for biodiversity and its conservation. It summarises the current status, of the habitat or species, factors affecting them, current action and objectives and targets. There are 6 habitats which are globally rare, and for which Exmoor has international

⁸⁷ Biodiversity means the variety of life on earth, and is used here to refer to the diversity of wildlife and habitats found on Exmoor

⁸⁸ Section 40 of the Natural Environment and Rural Communities Act 2006

⁸⁹ The UK Biodiversity Action Plan (BAP) 1994

⁹⁰ As required under the Countryside and Rights of Way (CROW) Act 2000

⁹¹ Convention on Biological Diversity, COP Decision X/2, Strategic Plan for Biodiversity 2011-2020 (2010)

⁹² Biodiversity 2020 – A Strategy for England's Wildlife and Ecosystem Services, DEFRA 2011

⁹³ The Natural Choice – Natural Environment White paper, June 2011

⁹⁴ Making Space for Nature: A Review of England's Wildlife Sites and Ecological Network (2010)

⁹⁵ NPPF 2012 DCLG

⁹⁶ Para 7 NPPF 2012 DCLG

⁹⁷ Para 9 Natural Environment White Paper quoted in NPPF 2012 DCLG

⁹⁸ Para 109 NPPF 2012

⁹⁹ Exmoor BAP (2001) ENPA

responsibilities, and another 9 habitats that are nationally important. Plantation forests and reservoirs are considered to be locally important.

Table 5.1 Exmoor’s Important Habitats

International Importance	National Importance
Blanket Bog	Valley mire and springline communities
Upland Heathland	Marshy grassland (some types)
Lowland Heathland	Upland rivers and streams
Upland Oak Woodland	Sea cliffs and inland rock exposures
Parkland, Wood Pastures and Veteran Trees	Bracken and scrub
Marshy Grassland (some types)	Hedgerows
	Unimproved grassland
	Coastal Shingle and Grazing Marsh
	Ponds
	Traditional orchards
Local Importance	
Plantation forests	
Reservoirs	

- 5.48. There are many rare species on Exmoor and the BAP (Appendix 2) mentions 118 species as being ‘important’. Many of these are associated with the moorlands, but there are also those that are more likely to be associated with development, including for example different types of bats. This includes species that are part of Exmoor’s distinctiveness, such as red deer, and even some that are unique to Exmoor, such as three species of whitebeams, as well as species that are more widespread, but have been identified as requiring conservation at a national or international level e.g. Atlantic Salmon, dormouse and otter.

INTERNATIONALLY AND NATIONALLY DESIGNATED BIODIVERSITY ASSETS

- 5.49. Some of Exmoor’s wildlife is given special consideration through a hierarchy of site designations which confer different levels of protection in recognition of their international, national or local importance. Special Areas of Conservation (SACs)¹⁰⁰ are designated to protect the distinctive wildlife which can be found in these specific habitats – these are Exmoor Heaths SAC and Exmoor and Quantock Oakwoods SAC. The combined areas of SACs cover around 12,600 ha of Exmoor. Legislation¹⁰¹ restricts the granting of permission for development which is likely to significantly affect a SAC and which is not directly connected with or necessary to the management of the site for nature conservation. The environmental effects of any proposed development likely to have a significant effect on a SAC alone or in combination with other projects, will be subject to the most rigorous examination by the National Park Authority, as set out in the Habitats Regulations, and is subject to separate statutory procedures including Appropriate Assessment. National planning policy states that development likely to have a significant effect on sites protected under the Habitats Directives would not be sustainable under the terms of the presumption in favour of sustainable development¹⁰².
- 5.50. Sites of Special Scientific Interest (SSSIs)¹⁰³ are designated by Natural England¹⁰³ for their ecological or geological value. They form a national network of sites which represent the best examples of wildlife habitats, geological features and landforms in the country. Some SSSIs are also designated as National Nature Reserves (NNRs) due to their nature conservation or geological interest, and are intended to provide opportunities for the public to enjoy and experience these interests. The total area of the National Park designated by UK and European law to protect wildlife is over 19,300 ha (about 28% of the National Park).
- 5.51. Legislation¹⁰⁴ imposes a number of obligations and restrictions on owners, occupiers and public bodies regarding any activities that may affect SSSIs. Natural England has powers to

¹⁰⁰ EC Council Directive on the Conservation of Natural Habitats and Wild Fauna and Flora (92/43/EEC) 1992

¹⁰¹ The Conservation (Natural Habitats, &c) Regulations, S.I. 1994 No. 2716

¹⁰² Para 16 Draft NPPF 2012 DCLG

¹⁰³ Designated under the Wildlife and Countryside Act 1981

¹⁰⁴ Wildlife and Countryside Act 1981 as amended by the Countryside and Rights of Way Act 2000 and Natural Environment and Rural Communities (NERC) Act 2006

enter into management agreements for SSSIs, and must be notified regarding operations which may affect the site, and must also be consulted on planning applications and works which may impact on the site. Development proposals should conserve and respond to opportunities to enhance SSSIs through the planning system. Where a development proposal may adversely affect a SSSI, the applicant will be required to provide an assessment of the likely impacts of the proposal, and possible measures to avoid damaging effects. Some proposals will require an Environmental Impact Assessment under the EIA Regulations¹⁰⁵. Development proposals likely to affect a SSSI will be subject to the most rigorous examination by the National Park Authority.

SPECIES PROTECTION

- 5.52. Within the National Park there are a number of rare, localised and characteristic plant and animal species, many of which are protected by legislation. Endangered species, protected by legislation¹⁰⁶, may be found in areas that do not receive special protection. The Exmoor BAP (Appendix 2) identifies species that are important on Exmoor. This includes some legally protected species, and those that have been identified as important or rare in a national context, or are locally important on Exmoor.
- 5.53. The Wildlife and Countryside Act prohibits the deliberate killing, injury or taking of species listed in Schedules 1, 5 and 8 or the destruction or obstruction of their habitats or places of shelter. The Habitats Directive requires the establishment of a system of strict protection for the animal species listed in Annex IV(a), which include dormice, otters and all UK species of bats, (17 out of 18 bat species are found on Exmoor). The Habitats Regulations makes it an offence to deliberately kill or disturb a European protected species (i.e. those species protected under the Habitats Regulations), or damage or destroy their breeding site or resting place. European protected species are also afforded protection from deliberate disturbance likely to significantly affect the local distribution or abundance of the species to which they belong.
- 5.54. Development proposals likely to affect European protected species will be subject to the most rigorous examination. The National Park Authority is obliged under the Conservation of Habitats and Species Regulations 2010 (reg.9) to have regard for the provisions of the Habitats Directive which includes the maintenance of 'Favourable Conservation Status' of European protected species, i.e. the populations of such species and the habitat to support them are maintained. This is separate from any subsequent licensing requirements. Developers will be expected to provide data with an application to enable an assessment to be carried out.
- 5.55. Applicants should check whether a European protected species or species identified as important or rare in a national context, or locally important on Exmoor (including those listed in Appendix 2 of the Exmoor BAP) is present on site at the earliest possible stage. Where such a species may be present the National Park Authority will require applicants to arrange and pay for surveys by a suitably qualified consultant to assess whether such a species is present. The National Park Authority will expect that proposals clearly demonstrate that they will not result in the disturbance or killing of a protected or important species, or damage to or destruction of their breeding sites or resting places. If proposals are likely to result in the disturbance or killing of a European protected species or damage to its habitat then a licence will usually be required from DEFRA. A licensing regime also applies to badgers through the Protection of Badgers Act 1992. Planning conditions and obligations will be used to ensure that harm is avoided to protected or important species or in exceptional circumstances where this cannot be avoided, and development is permitted, to provide mitigation or compensation measures. There may also be circumstances where the National Park Authority would support removal of invasive species as part of applications, where this would support National Park purposes and enhance biodiversity.

¹⁰⁵ The Town and Country Planning (Environmental Impact Assessment) Regulations 2011, SI 2011 No. 1824

¹⁰⁶ Certain plants and animal species, including all wild birds, are protected under the Wildlife and Countryside Act 1981 European plant and animal species are protected under and the Conservation (Natural Habitats, &c) Regulations, S.I. 1994 No. 2716. Some other animals are protected under their own legislation, for example the Protection of Badgers Act 1992

LOCALLY IMPORTANT BIODIVERSITY ASSETS

- 5.56. Exmoor also supports over 500 Local Wildlife Sites (formerly known as County Wildlife Sites), which are sites of significant nature conservation value. Although they do not have any statutory status, many are equal in quality to the representative sample of sites that make up the series of statutory SSSIs. Local Wildlife Sites are identified by local partnerships and provide a more comprehensive suite of sites as well as representing local character and distinctiveness. They have a significant role to play in meeting national and local biodiversity targets, and can play a very important part in maintaining the links that join up and support the nationally and internationally recognised sites. They also contribute to the quality of life and the well-being of the community, with many sites providing opportunities for research and education.
- 5.57. A number of nature reserves have also been established in the National Park. These are non-statutory, although many are on areas designated as SSSIs which provide the legal protection set out above. In addition, Exmoor has a number of Section 3 habitats¹⁰⁷ which are identified for their natural beauty, including woodland, cliff and foreshore, and moor and heath. Within these areas there is the strongest possible presumption in favour of the conservation of their natural beauty, flora, fauna and landscapes.

SITES OF GEOLOGICAL OR GEOMORPHOLOGICAL INTEREST

- 5.58. Exmoor has 67 Regionally Important Geological sites (RIGS) which have been identified by local partnerships for their geological (rocks, minerals, fossils), or geomorphological (land form, processes) interest, which are important for research and stimulating public interest in geology. A number of these sites are nationally important and are designated as SSSIs.

Table 5.2 Hierarchy of Nature Conservation Designations

IMPORTANCE	SITE DESIGNATION	EXPLANATION	NOTES
INTERNATIONAL	SPECIAL AREAS OF CONSERVATION (SACs) “the Habitats Directive”	Sites of European importance as natural habitats, designated to conserve habitats and species which are rare or threatened within the European Union. Sites hosting habitats or species which are particularly threatened have “priority” status. SACs with SPAs will form part of the “Natura 2000” Network.	There are two SACs within the National Park - Exmoor Heaths SAC and Exmoor & Quantock Oakwoods SAC.
NATIONAL	NATIONAL NATURE RESERVES (NNRs) S.19 of the National Parks & Access to the Countryside Act 1949, or S.35 of the Wildlife & Countryside Act 1981	Sites of key national or international, biological or geological importance managed primarily for nature conservation. NNRs are owned or leased by English Nature, or bodies approved by them or are managed in accordance with Nature Reserve Agreements with landowners or occupiers.	There are three NNRs (Dunkery and Horner Woods NNR, Hawkcombe Woods NNR, and Tarr Steps NNR) within the National Park.
	SITES OF SPECIAL SCIENTIFIC INTEREST	SSSIs collectively form a nationally important network of sites of biological or geological value and are notified by English Nature in accordance with published guidelines.	There are 18 SSSIs in the National Park.

¹⁰⁷ Section 3 habitats designated under the Wildlife and Countryside Act 1985

Table 5.2 Hierarchy of Nature Conservation Designations			
IMPORTANCE	SITE DESIGNATION	EXPLANATION	NOTES
LOCAL	LOCAL WILDLIFE SITES (previously known as county wildlife sites) Non-statutory wildlife sites	Wildlife sites important in a local or county context. Some Local Wildlife Sites may include habitats of comparable quality to SSSIs. Identified by the Wildlife Trusts (in Somerset through the Somerset Environmental Records Centre (SERC) & in Devon through the Devon Biodiversity Records Centre (DBRC)) within agreed criteria.	There are over 500 Local Wildlife Sites in the National Park.
	REGIONAL GEOLOGICAL AND GEOMORPHOLOGICAL SITES (RIGs) (COUNTY GEOLOGICAL SITES)	Sites of regional or local geological or geomorphological importance which have been identified by local geologists in consultation with landowners. Sites are selected primarily for their educational value, but are also important for research and stimulating public awareness of geology. Some sites have also been identified as nationally important and designated as SSSIs.	There are 67 RIGs within the National Park.
	LOCAL NATURE RESERVES (LNRs) Section 21 of the National Parks and Access to the Countryside Act 1949.	LNRs are sites of at least local importance for nature conservation, which are declared and usually managed by local authorities.	There are currently no LNRs within the National Park
	NON-STATUTORY NATURE RESERVES	Non statutory nature reserves have been established in the National Park by the Somerset Wildlife Trust, the Woodland Trust and the Exmoor Natural History Society. Many of these are on SSSIs and are therefore more than locally important.	

CREATING ECOLOGICAL NETWORKS

5.59. There are other biodiversity assets in the National Park which are not designated, but form an important element of the total nature conservation resource. The Habitats Directive¹⁰⁸ highlights the need for effective management of linear or continuous features essential for migration, dispersal and genetic exchange. Such features, like rivers, ponds, small woods and traditional field boundaries such as hedgerows, extend across designated and non-designated areas. These features in particular, will provide the building blocks for achieving the Government's objective to restore and connect wildlife habitats and contribute towards a net gain for biodiversity. They are also important in providing routes or stepping stones for the migration, dispersal and genetic exchange of species and to allow species to adapt to climate change. The maintenance and enhancement of these networks will be encouraged. Suitable planning conditions and obligations may be used to promote such management and enhancement¹⁰⁹. These features can be important components of green infrastructure, both within the National Park, and linking into and out of the National Park into surrounding areas. The National Park Authority will work with adjoining authorities to support networks of green infrastructure.

¹⁰⁸ Article 10 EC Council Directive on the Conservation of Natural Habitats and Wild Fauna and Flora (92/43/EEC) 1992

¹⁰⁹ Circular 0605 Biodiversity and Geological Conservation - Statutory Obligations and Their Impact Within the Planning System, DCLG

BIODIVERSITY CONSIDERATIONS

- 5.60. National policy sets out an expectation for local planning authorities to plan for biodiversity at a landscape-scale and across local authority boundaries where necessary and consultation¹¹⁰ confirmed ongoing support for improving and increasing existing sites, as well as extending and linking wildlife sites. Work to enhance biodiversity is based on the BAP, which sets out the objectives and targets for the recovery of species populations, improving the condition of existing habitats and restoring or recreating new areas of habitat. The *South West Nature Map*¹¹¹ identifies the best areas to conserve, create and connect wildlife habitats at landscape scale. The Map shows a number of habitats where Exmoor can particularly play a role in habitat recreation, namely:
- a) Coastal heaths
 - b) Upland heaths
 - c) Woodland
 - d) Coastal vegetated shingle
- 5.61. The National Park Authority will work with adjoining authorities, local communities and land managers, the private sector and conservation organisations to identify and take forward opportunities for biodiversity enhancement where this is consistent with landscape character (CE-S1). The Biodiversity Strategy 2020 encourages the establishment of Nature Improvement Areas (NIAs) by local partnerships, based on a local assessment of opportunities for restoring and connecting nature on a significant scale. Applicants are advised to check with the National Park Authority as to whether any NIAs have been agreed.
- 5.62. The hierarchy of wildlife sites on Exmoor is shown in Table 5.2 above and included on the Proposals Map. In considering applications affecting the natural environment, the National Park Authority will seek to minimise impacts on biodiversity and provide net gains in biodiversity, where possible.
- 5.63. Applicants should ensure that sufficient information is provided regarding the wildlife sites or species that may be affected by a proposal. Insufficient information can significantly delay decision making. The re-use of buildings and previously developed land in particular would require careful assessment of any existing wildlife interest. Where a development poses a likely risk of harm to a protected or priority BAP species, applicants should ensure that a survey is carried out by a suitably qualified professional in advance, and submit the results of this survey with the planning application. Applicants should also show how the proposal has taken this evidence into account through its design and any mitigation or compensation proposed. The National Park Authority has produced a Biodiversity Checklist to help applicants consider whether their proposal is likely to affect any important or protected species or habitats and if further surveys are necessary. It alerts applicants to potential impacts on species including bats, badgers, barn owls, dormice, breeding birds, otters and reptiles, or habitats such as SACs, SSSI, Local Wildlife Sites, hedgerows, woodland and trees, unimproved grassland, heathland or rivers, streams and ponds. Pre-application discussions can prevent delays and help ensure that planning applications are submitted with adequate information on biodiversity and geological impacts. In some cases (for example if proposals may affect a SSSI), it may be appropriate to include third parties, such as Natural England, in these discussions.
- 5.64. The incorporation of measures to enhance biodiversity (or geological features) in and around development will be encouraged, for example through good design, (such as incorporating access to roof spaces for species such as bats), the provision of breeding or roosting sites (such as bat or bird boxes, or nest boxes for dormice), the conservation of veteran trees, and the creation of new habitats such as hedgerows or ponds that are appropriate to the landscape. These are just some examples of how development can benefit biodiversity and further advice and guidance is available from National Park Authority Officers.
- 5.65. The National Park Authority will work in close collaboration with Natural England and non-statutory conservation agencies such as the Somerset and Devon Wildlife Trusts, the RSPB, and recognised local experts as appropriate, as well as using its own specialist knowledge in assessing the likely impact of development proposals.

¹¹⁰ Your Future Exmoor (YFE) consultations 2010

MITIGATION AND COMPENSATION

- 5.66. As a principle in the National Park, all development should avoid harm to biodiversity or geological interest. However, where proposed development is likely to result in adverse impacts to sites, species and features included in Policy CE-S2, the need for the development and the reasons why impacts cannot be avoided must be clearly demonstrated. When the case is accepted, such impacts must be minimised and any residual impacts compensated for. Compensatory measures may be required in advance of the development in appropriate cases. Long term site management and monitoring may be required in order to ensure that the compensatory measures achieve their objectives. To this end, the National Park Authority will seek to attach conditions and legal agreements to any granting of planning permission.

CE-S2 BIODIVERSITY

- 1. The conservation and enhancement of wildlife, habitats and sites of geological interest will be given great weight. The enhancement of biodiversity or geological interest as part of development proposals will be encouraged, including the incorporation of biodiversity in and around developments.**
- 2. Habitat management, restoration, or creation and linkages between habitats will be supported, particularly those habitats or species that Exmoor is internationally or nationally important for or that are locally important as identified in the Exmoor Biodiversity Action Plan.**
- 3. Proposals that enable habitats and species to adapt to climate change or that mitigate against climate change, including through carbon storage, will also be encouraged providing they do not adversely affect the integrity or special interest of the site.**
- 4. Development affecting wildlife, habitats or sites of geological interest will be judged according to their level of importance, the legal protection afforded to them, and the hierarchy of international, national and locally designated sites, in accordance with the following principles:**
 - a) Development in, or likely to have an adverse effect, on the conservation objectives of internationally designated sites either directly or indirectly, including on features outside the designated site which support the ecological functioning of cited habitats and species, or on the integrity of special interest of nationally designated sites will not be permitted.**
 - b) Development likely to cause harm to legally protected or important species including those identified through the UK and Exmoor Biodiversity Action Plans, or lead to the loss of or damage to their habitats, will not be permitted unless this can be mitigated or then offset so that local populations are at least maintained.**
 - c) Development likely to adversely affect local sites designated for their wildlife or geological interest and other features of the landscape including those identified as priorities in the Exmoor BAP will not be permitted, unless it can be demonstrated that the need for, and benefits of the development clearly outweigh the loss of biodiversity and this can be mitigated against and compensated for elsewhere.**
 - d) Where, in exceptional circumstances, planning permission is granted for development likely to affect the nature conservation value of habitats or species or the geological interest of sites, then measures will be required to first avoid such impacts, and if they cannot be avoided, then to mitigate damage and provide appropriate compensatory measures.**

GREEN INFRASTRUCTURE

PURPOSE OF THE POLICIES

5.67. The policy approach enables the positive planning of green infrastructure which in turn provides key environmental functions and socio-economic benefits. This approach articulates the importance of integrating green infrastructure networks in association with other policies in the Local Plan including the ecosystem services approach that is promoted in the Partnership Plan as a key driver for achieving many of the priorities for action.

NATIONAL POLICY CONTEXT

- 5.68. National policy encourages Local Plan policies to set out a strategic approach for the creation of green infrastructure networks that contribute towards the conservation and enhancement of the natural environment and the wider aims and benefits of green infrastructure relating to landscape, biodiversity, design, open space, recreation, health and well-being, and climate change mitigation and adaptation¹¹². Communities can ensure that important areas of green space are designated in the Local Plan or within Neighbourhood Plans as 'Local Green Space'¹¹³.
- 5.69. National Parks are recognised as providing some of the best quality green infrastructure that helps create a healthy environment for people, communities and businesses, and improving air and water quality. The National Parks Circular adds that effective management of land in the National Parks helps to mitigate the effects of climate change including flooding and maintaining, restoring or adding to networks of natural habitats and other landscape features can be incorporated into a more broadly functioning green infrastructure including consideration of habitat networks beyond the National Park boundary, where this contributes to improved connectivity and the wider living landscape¹¹⁴.

CONTEXT

- 5.70. Green infrastructure networks encompass a wide range of high quality natural, semi-natural, and amenity green spaces and other environmental features. Green infrastructure is planned, or already exists as a multifunctional resource that can deliver a range of benefits that helps underpin sustainable communities. Although green infrastructure is predominantly planned and designed in an urban context, it also has a role in rural areas where land may provide a range of functions and ecosystem services such as: linkages between habitats, biodiversity benefits, carbon storage, flood protection, water purification, and areas for recreation and enjoyment¹¹⁵. National Parks provide the highest quality green infrastructure on a broad landscape scale that includes extensive habitats, major landscape features, and public access land/rights of way¹¹⁶.
- 5.71. Blue infrastructure refers to the water environment such as the coast, rivers, streams, wetlands, floodplains, ponds, lakes and sustainable drainage systems. It is significant in terms of the important role it has for biodiversity, recreation, flood mitigation and climate change adaptation. Blue infrastructure is usually incorporated within the terminology 'green infrastructure' but can be specifically identified as a tool to improve climate change resilience¹¹⁷.

PROVISION

5.72. Green infrastructure encompasses a variety of spatial scales from provision of open space within communities to large landscape-scale programmes and the links between them. The aims and objectives of the Partnership Plan are central to landscape scale planning in terms of effective land management that also secures green infrastructure benefits through associated projects, plans and strategies including: Landscape Action Plan, Landscape Strategy,

¹¹² Para 99 NPPF 2012 DCLG

¹¹³ NPPF 2012 DCLG

¹¹⁴ English National Parks and the Broads UK Government Vision and Circular 2010

¹¹⁵ Natural Environment White Paper

¹¹⁶ Green Infrastructure Guidance(NE176) – Natural England

¹¹⁷ www.grabs-eu.org Green and Blue Space Adaptation for Urban Areas and Eco Towns (GRaBS) project website. The GRaBS project is a network of leading pan-European organisations involved in integrating climate change adaptation into regional planning and development

Biodiversity Action Plan, Carbon Neutral Exmoor project, Exmoor Mires project, and the Rights of Way Improvement Plan.

- 5.73. Policy CE-S3 encourages the delivery of green infrastructure, with the support of partner organisations and people that live and work on Exmoor, to provide an effective basis for the enhancement of existing multifunctional green infrastructure networks and to enable the creation of physical and functional network linkages throughout the National Park and cross-boundary links with the surrounding area. Green infrastructure can help deliver ecosystem services as part of the wider public benefits that Exmoor provides to society.
- 5.74. It is important that green infrastructure is planned around existing assets. A holistic understanding of the area therefore, is essential in planning for green infrastructure and to ensure a bespoke response to both the natural and historic environment. Areas designated for their ecological/geological importance (CE-S2) should be identified within any green infrastructure proposals and contribute to the priorities defined in relevant plans and programmes including the Biodiversity Action Plan and Local Nature Partnerships¹¹⁸. Green infrastructure should help to address connectivity such as linkages between these designated areas and other important habitats – such links are critical in overcoming habitat fragmentation and allowing species to migrate and adapt to climate change. The Exmoor National Park Ecological Network Map¹¹⁹ will assist in establishing biodiversity resilience. However, it will not always be appropriate to combine connectivity for wildlife and accessibility for people. All development proposals should make specific provision for green infrastructure including for wildlife that may also help to support biodiversity adaptation to climate change (CE-D2 Green Infrastructure Provision).
- 5.75. Similarly, schemes should reflect and enhance the landscape character types across the National Park (CE-S1) and recognise the broad priorities for each landscape type and the priority areas for action set out in the Exmoor Landscape Action Plan. This will help to ensure that green infrastructure will reinforce the sense of place whilst also contributing to the delivery of sustainable land management e.g. through Higher Level Stewardship (HLS) schemes.
- 5.76. The multi-functional role of green infrastructure can strengthen climate change mitigation and adaptation measures (CC-S1). In terms of helping to reduce flood risk, strategic land management programmes can have a significant impact on making space for water, reducing peak flows and helping to lessen the impact of potential flood risk and conserving water (CC-D1 and CC-D3) – such as the multi-objective flood management demonstration scheme on the National Trust's Holnicote Estate¹²⁰. Such projects can provide wider benefits including: environmental education, habitat creation, enhancing landscape character, improving water quality and improved soil quality.
- 5.77. Sustainable Drainage Systems (SuDS), which deal with surface water, are designed to mimic natural drainage as closely as possible in a built environment context (CE-S7 and CC-D1). They provide an example of green infrastructure and an illustration of opportunities to achieve multiple benefits from the management of land together with opportunities to provide public open space (HC-S7). Green infrastructure, including open space, can act as the 'green lungs' of a settlement and will generally contribute to improving air quality.
- 5.78. Climate change mitigation can be achieved by carbon storage including woodland planting and mire restoration as well as reducing the need to travel by private transport (AC-S1 Sustainable Transport) through provision of access routes for sustainable modes of travel – this may be achieved by means of creating linkages between existing public rights of way or specific routes to enable access to local services and facilities.
- 5.79. Green infrastructure can also create a range of social and economic benefits for those who live and visit Exmoor. It is recognised that nature has a positive impact that on mental and physical health and help children's learning. High-quality natural environments have been shown to foster healthy communities and green spaces encourage social activity¹²¹. Green infrastructure can therefore be incorporated to enhance the health and well-being of local communities and those visiting Exmoor and also enhance existing assets such as the extensive access network (RT-D12) to promote the quiet enjoyment of the National Park. It

¹¹⁸ Both Somerset and Devon have Local Nature Partnerships co-ordinated by the Wildlife Trusts for both counties

¹¹⁹ Work is ongoing to complete ecological network mapping across the National Park

¹²⁰ Multi-Objective Flood Management Demonstration Scheme: Project Factsheet 1 (DEFRA 2011)

<http://archive.defra.gov.uk/environment/flooding/documents/manage/multi-objective-fm-scheme-factsheet1.pdf>

¹²¹ Natural Environment White Paper – The Natural Choice: securing the value of nature (DEFRA 2011)

can also have positive benefits for the economy both directly, through employment in capital projects and future management, and indirectly, through sustaining a high quality environment to attract visitors to Exmoor.

CE-S3 GREEN INFRASTRUCTURE

- 1. The National Park Authority will encourage the conservation, enhancement and creation of multifunctional green infrastructure networks at a variety of spatial scales including cross-boundary linkages that help to support ecosystem services, through working with neighbouring authorities, local communities, land owners and other partners.**
- 2. Green infrastructure proposals should:**
 - a) protect and enhance existing natural and historic environments (CE-S2, CE-S4)**
 - b) strengthen connectivity between habitats (CE-S2)**
 - c) be locally distinctive through reflecting and enhancing landscape character (CE-S1)**
 - d) maximise opportunities to mitigate and adapt to climate change (CC-S1)**
 - e) improve quality of life through provision of benefits for health and well-being, including opportunities to access open space and the quiet enjoyment of the National Park (HC-S7, RT-S1, RT-D12)**
- 3. Green infrastructure provision is required as an integral part of all new development (CE-D2 Green Infrastructure Provision).**

GREEN INFRASTRUCTURE PROVISION

CONTEXT

- 5.80. Policy CE-D2 Green Infrastructure encourages the provision of green infrastructure as an essential component of all new development¹²² on a scale that is commensurate with the nature, scale and activity of any development proposal.
- 5.81. Green infrastructure may already be incorporated in some types of development – for example where planting, screening or hedgerows are provided as part of a landscaping scheme, or a footpath link is included – where this may not apply, suitable measures can be incorporated to provide enhancements to biodiversity (CE-S2) and green infrastructure networks within the National Park and could include:
- a) Places for outdoor relaxation and play: e.g. public open space, recreation grounds, play areas (HC-S7)
 - b) Space and habitat for wildlife with access to nature for people: e.g. landscaping/planting schemes, small-scale habitat provisions to encourage wildlife (CE-S1, CE-S2, CE-S7)
 - c) Climate change mitigation and adaptation: e.g. tree planting, green roofs, provision of ponds/swales/wetland through sustainable drainage systems (CC-S1, CC-D1).
 - d) Environmental education (RT-S1)
 - e) Local food production: e.g. in allotments, orchards and gardens (HC-S7)
 - f) Improved health and well-being – lowering stress levels and providing opportunities for exercise: e.g. wild play areas, creation of public footpath linkages, green open space (HC-S7, RT-S1, AC-D19, RT-D12)
- 5.82. This policy aims to deliver green infrastructure enhancements, such as habitat provision for wildlife, within the National Park. Advice is available from officers at the National Park Authority to help applicants provide the most suitable enhancement in relation to the scale and type of development and the surrounding habitat. Incorporating elements of green infrastructure within developments will contribute towards wider outcomes and benefits for the green infrastructure network across the National Park.
- 5.83. The design of new development can readily incorporate green infrastructure principles in a way that reflects local character, including the creation or enhancement of green space that

¹²² <http://www.naturalengland.org.uk/ourwork/planningdevelopment/greeninfrastructure/default.aspx>

can contribute to the setting of buildings and settlements. New development such as housing can also provide green infrastructure on a smaller scale by incorporating gardens, community orchards, wild play areas, ponds, native planting of green roofs, landscaping (CE-S7, CE-S1) and allotments.

- 5.84. Even relatively small development proposals can directly add value to biodiversity and green infrastructure through inexpensive but effective measures including:
- a) nesting sites for birds (e.g. boxes for owls, swallows, house martins etc)
 - b) roosting areas for bats
 - c) establishing of small areas of habitat and/or native planting.
- 5.85. These smaller measures also help to achieve the aims of policy CE-S2 Biodiversity.

CE-D2 GREEN INFRASTRUCTURE PROVISION

- 1. All development proposals should include measures that will enhance green infrastructure provision in the National Park commensurate with the scale of the proposal and intensity of activity expected.**
- 2. Proposals will be favourably considered where a range of green infrastructure benefits can be achieved, provided that other requirements of the plan are met.**

CULTURAL HERITAGE AND HISTORIC ENVIRONMENT

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

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

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

PURPOSE OF THE POLICY

5.86. Policy CE-S4 and CE-D3 set out the approach to protecting and enhancing the historic environment and managing development affecting heritage assets in Exmoor National Park.

NATIONAL POLICY CONTEXT

5.87. National Parks are designated for the purpose of conserving and enhancing natural beauty, wildlife and cultural heritage¹²³, and the Government's vision for National Parks is that they are "thriving, living, working landscapes notable for their natural beauty and cultural heritage... and everyone can discover the rich variety of England's natural and historic environment, and have the chance to value them as places for escape, adventure, enjoyment, inspiration and reflection, and a source of national pride and identity¹²⁴". The Government's vision¹²⁵ and policies¹²⁶ for the historic environment recognise the central role it plays in cultural heritage and the multiple ways its supports and contributes to the economy, society and daily life, and also that it is a non-renewable, resource. Government places a priority on its conservation for future generations. The excellent quality of preservation of archaeological sites and historic features and the diverse nature of the historic resource within the National Park make it of special significance. The quality of the cultural heritage and historic environment are part of what attracts people to visit Exmoor, and is therefore an important part of the local economy. However, these resources are also fragile, vulnerable to insensitive change and, ultimately irreplaceable. The protection and enhancement of Exmoor's cultural heritage and historic environment is consequently a high priority. The historic character of buildings and settlements is easily eroded by small changes over time as well as by new development and insensitive modernisation for example, unsightly overhead wires, removal of traditional fabric such as cobbling, or increasing the clutter of signs and street furniture. Similarly, the quality and character of Exmoor's historic buildings can easily be destroyed by unsympathetic or inappropriate renovation, repair, extension, redevelopment, or simply by neglect. The National Park Authority is able to influence the effect of alterations to historic buildings, the design of new buildings and other works through the planning policies set out in this Plan and places a high priority on protecting and enhancing Exmoor's cultural heritage and historic environment.

CONTEXT

5.88. The historic environment is a rich and diverse part of Exmoor's cultural heritage. It results from the interaction between people and places through time, and creates local distinctiveness and a sense of place. This historic environment provides the evidence for past ways of life, technologies and the exploitation of the natural resources of Exmoor. Exmoor's historic landscape includes thousands of individual sites and structures, and the preservation of sites on Exmoor is generally excellent. The survival of such a remarkable record of landscape change is very rare in England.

¹²⁵ The Government's vision for National Parks is that they are "thriving, living, working landscapes notable for their natural beauty and cultural heritage... and everyone can discover the rich variety of England's natural and historic environment, and have the chance to value them as places for escape, adventure, enjoyment, inspiration and reflection, and a source of national pride and identity"

¹²⁶ NPPF 2012 DCLG

EXMOOR'S HERITAGE ASSETS

- 5.89. Heritage assets are the valued elements of the historic environment that hold meaning for society over and above their functional utility. The significance of a heritage asset is based on its value to current and future generations, and is the sum of its architectural, historic, artistic or archaeological interest and its setting. Some heritage assets have a level of significance that justifies special protection measures through designation, but locally valued assets also play a key role in defining place and in building local pride.
- 5.90. Within Exmoor, the designated heritage assets include:
- a) 16 Conservation Areas designated under the Planning Act 1990 for their special historic or architectural interest, the character and appearance of which it is desirable to preserve or enhance. Conservation Areas have been designated for Allerford, Bossington and West Lynch, Colton Farm, Dulverton, Dunster, Leigh Barton Farm, Lower East Lyn Farm, Luccombe, Lynmouth, Lynton, Parracombe, Porlock, Porlock Weir, Ranscombe Farm, Selworthy, and Wootton Courtenay. The Conservation Areas all have Character Appraisals which record the key features which contribute to their character. These traits can be eroded by small incremental changes over time, and the National Park Authority has a rolling programme for updating these Appraisals and assessing their condition. The potential for further Conservation Areas will be kept under review.
 - b) 741 Listed Buildings designated under the Planning Act 1990 which hold special historic or architectural interest. Buildings are graded according to the level of interest as Grade I (exceptional), Grade II* (particularly important), or Grade II (special interest). Exmoor has 20 Grade I, 53 Grade II* and 668 Grade II. 4.2% of all the Listed Buildings are considered to be at risk¹²⁷.
 - c) 201 Scheduled Monuments (SMs) designated under the Ancient Monuments and Archaeological Areas Act 1979 as nationally important by reason of their historic, architectural, artistic, traditional or archaeological interest. Surveys undertaken in 2005 and 2010 indicated that about 19% of Scheduled Monuments within Exmoor National Park are 'At Risk'. Since then, a Monument Management Scheme, run jointly with English Heritage, is aimed at bringing Exmoor's Scheduled Monuments into good or improving condition.
 - d) 2 Historic Parks and Gardens that are registered by English Heritage under the Historic Buildings and Ancient Monuments Act 1953 for their special historic interest. The two designations on Exmoor are Nettlecombe Court (Grade II) and Dunster Castle (Grade II*).
 - e) In addition, Exmoor has heritage assets with archaeological interest that are of equivalent significance to Scheduled Monuments, although they are not designated. These aspects of Exmoor's historic environment are of such complexity or rarity that they are of regional or national significance, including the extensive survival of prehistoric archaeology (especially on the moorlands); the widespread evidence of agricultural reclamation, and the evidence for early industrial exploitation such as iron mining and smelting. These are included on the Exmoor National Park Historic Environment Record (HER) and will be considered in the same way as designated assets, as set out in Policy CE-S4.
- 5.91. The Proposals Map shows the location of Scheduled Monuments, Conservation Areas, Listed Buildings and Historic Parks and Gardens within the National Park.

NON-DESIGNATED HERITAGE ASSETS

- 5.92. Additionally, Exmoor has a wealth of historic buildings, settlements, sites and structures which are not designated, but form an important part of the local character and distinctiveness of the area and are an important record of Exmoor's past. This includes diverse examples such as the remains of prehistoric settlements, barrows, standing stones, industrial sites and landscapes, the evidence of nineteenth century agricultural improvements and many historic buildings. Whilst archaeological sites and monuments form the most visible aspect of Exmoor's archaeological remains, buried sites and soil deposits, which are usually not visible, also contain a wealth of information about the past.
- 5.93. The historic environment extends beyond individual archaeological sites or specific historic buildings and settlements. The historic landscape is the backcloth of the historic environment

¹²⁷ Buildings at Risk Survey in progress

and is often overlooked. It provides a record of how Exmoor's landscape has been defined by human activity. For example, the character of the landscape of the former Royal Forest and the archaeological sites and historic buildings within it, have been defined by its ownership since the early medieval period. Elsewhere, many small hamlets lie at the heart of distinctive patterns of fields and are reached by a network of sunken lanes. The ancient landscape with its deep lanes and intricate field patterns is a key part of local character.

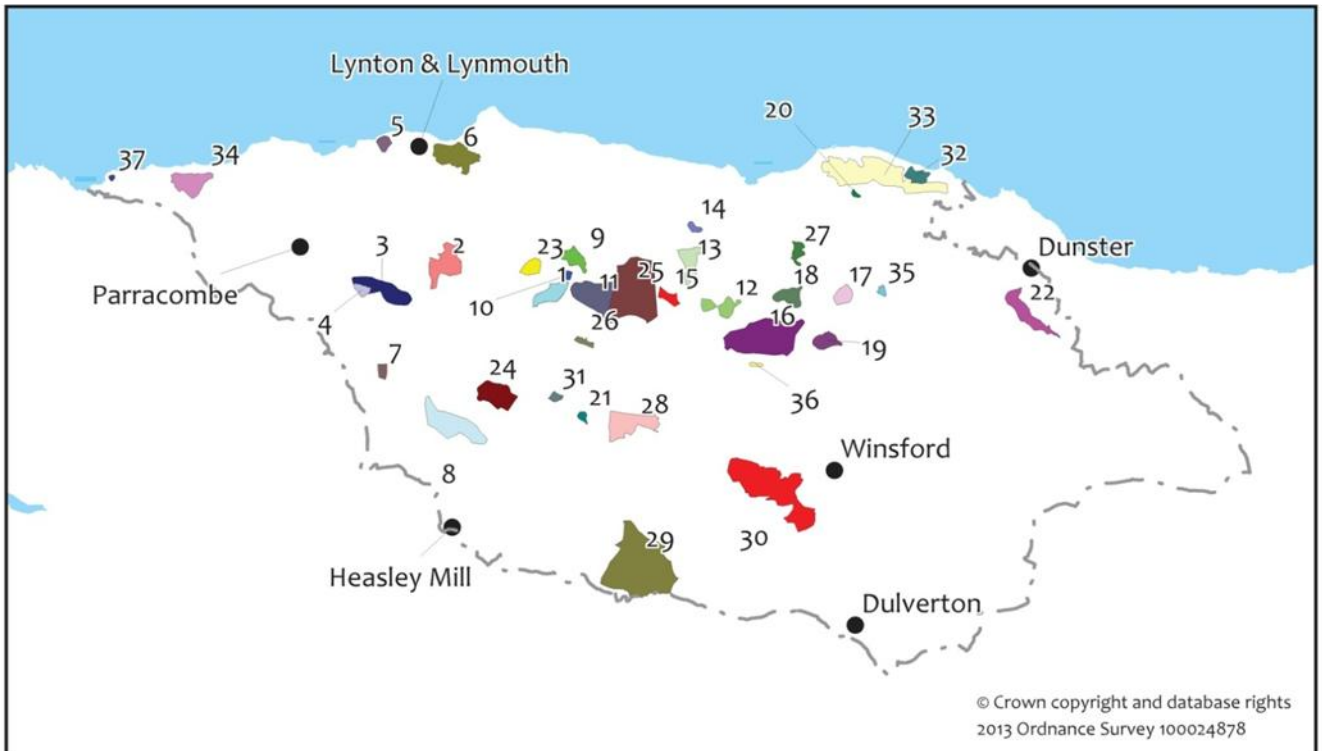
- 5.94. In addition to the national and statutory designations, local planning authorities may formally identify heritage assets that are important to the area, for example through local listing as part of the plan-making process. A set of criteria for developing a local list for Exmoor has been developed by Exmoor National Park Authority, and will be applied to assets identified through the Exmoor National Park Historic Environment Record (HER) and in consultation with local communities. This will form an important material consideration in determining planning applications.
- 5.95. Principal Archaeological Landscapes (PALs) have been identified¹²⁸ (see Map 5.4) that best represent the diversity of the archaeology of Exmoor. The archaeology of the moorland is exceptionally well preserved, making the resource as a whole of national significance. The PALs define landscapes rather than individual features. The relict prehistoric landscapes are nationally and possibly internationally significant. They form a rare and very extensive survival of entire past landscapes across the domestic, social, economic and spiritual spheres. Certain monument types (e.g. stone settings) are unique to Exmoor. The combined evidence for medieval farming and settlement across the moorland is at least of regional significance and in some instances national importance. The extent and preservation of remains is exceptional, in particular where settlements, field systems and paleoenvironmental deposits exist in close spatial proximity. The evidence of post-medieval reclamation and exploitation of mineral resources is nationally significant in terms of economic and industrial history. The character of the moorland landscape in areas such as Larkbarrow and Tom's Hill is a result of the process of enclosure and exploitation in the nineteenth century.

HISTORIC ENVIRONMENT RECORD

- 5.96. The wealth of heritage assets on Exmoor is recorded by the National Park Authority on the HER. This includes all known historic sites and features from the earliest human activity to the present day, with information on an estimated 8000 heritage assets in the National Park. All aspects of the archaeological and built environment are recorded and these records are updated as sites are identified. These include earthworks, ruins, finds, historic buildings, historic landscapes, industrial archaeology, military sites and boundaries. It records the existence of sites and indicates the research which has been undertaken for these assets. The HER also records locally important designed landscapes and historic gardens. New heritage assets are being identified all the time, and are added to the HER. The HER can be accessed online from the National Park Authority website, or by contacting the National Park Authority's officers. In considering development proposals, specialist advice from National Park Authority officers on the significance of the asset and its importance contributes to the conservation and enhancement of the area's cultural heritage.

¹²⁸ Fyfe and Adams (2008) Assessment of the Areas of Exceptional Archaeological and Historical Importance, Exmoor National Park

Map 5.4 Principal Archaeological Landscapes



- | | |
|------------------------------------|--|
| 15 Alderman's Barrow and Madacombe | 27 Ley Hill |
| 2 Badgworthy | 37 Little Hangman |
| 10 Badgworthy Hill | 19 Mansley Combe |
| 22 Bat's Castle and Gallox Hill | 29 Molland Common |
| 23 Brendon Common | 32 North Hill |
| 35 Brockwell Pits | 28 Pickedstones medieval field system |
| 24 Burcombe mining complex | 13 Porlock Allotment |
| 20 Bury Castle, Selworthy | 4 Radworthy |
| 3 Chapman and Woodbarrow complex | 17 Robin and Joaney How |
| 16 Codsand and Dunkery | 33 Selworthy WWII complex |
| 6 Countisbury and Lyn Gorge | 8 Setta Barrow, Five Barrows and Two Barrows complex |
| 21 Cow Castle | 7 Shoulsbury |
| 2 Furzehill | 18 Sweetworthy and Bagley |
| 12 Great Hill and Honeycombe Hill | 11 Trout Hill and Pinford |
| 14 Hawkcombe Head | 5 Valley of the Rocks |
| 34 Holdstone Down | 26 Warren Farm |
| 36 Kitnor Heath | 31 Wheal Eliza |
| 1 Lanacombe | 30 Winsford Hill |
| 25 Larkbarrow and Tom's Hill | |

CE-S4 CULTURAL HERITAGE AND HISTORIC ENVIRONMENT

- 1. Exmoor National Park's local distinctiveness, cultural heritage, historic environment and heritage assets, (valued for their archaeological, architectural, artistic or historic interest), will be conserved and enhanced in a manner appropriate to their significance including:**
 - a) Designated Conservation Areas, Scheduled Monuments, Listed Buildings (Grade I, II* and II), and registered Historic Parks and Gardens**
 - b) Non-designated heritage assets with archaeological or historic interest that are of equivalent significance to Scheduled Monuments identified on the Exmoor National Park Historic Environment Record**
 - c) Locally important historic sites and features identified on the Exmoor National Park Historic Environment Record**
 - d) The historic or architectural character of settlements**
 - e) Historic landscapes including Principal Archaeological Landscapes**

CONSERVING HERITAGE ASSETS

CONTEXT

NATIONAL PARK SETTLEMENTS AND CONSERVATION AREAS

- 5.97. The National Park's historic settlements form an important part of its character and local distinctiveness. Some have been designated as Conservation Areas (see para []). In recognition of their unique character and local distinctiveness which is derived from the combination of historical and architectural features including groupings of buildings, their form and prominence, different styles, the relationship between buildings and spaces, views along streets and between buildings, traditional street patterns and layouts and the design and traditional materials of buildings. Features within the Conservation Area such as bridges, trees, hedgerows, boundary walls, banks, rivers, open spaces and footpaths are all important in giving an area its character. Porlock Weir and Lynmouth include historic harbours. Not all elements of a Conservation Area are of significance however, and Character Appraisals have been completed for each Conservation Area¹²⁹ which identifies the historic, archaeological, architectural, and natural components that are considered especially important and contribute most to its character. The setting of a Conservation Area and the landscape within which it sits are also important. Conservation Area Appraisals take into account views from within the area looking out and views from outside looking in.
- 5.98. Development in Conservation Areas will be carefully controlled to ensure that their character is preserved or enhanced. Particular attention will be given to the special features for which the area is designated. In order to ensure that the impact of proposals on the valued elements of Conservation Areas can be properly assessed, the National Park Authority will normally require the submission of full applications in support of proposals within or adjacent to Conservation Areas. This might include the impact on the skyline, views in and out of the Conservation Area, the loss of or works to trees or the loss of definition of a settlement boundary. It will also seek to avoid cumulative impacts on the setting of the Conservation Area and the erosion of its aesthetics.
- 5.99. Conservation Area designation provides control over the demolition of some buildings, the lopping, topping or felling of any tree important to the character of the Conservation Area, and the right to display certain types of illuminated advertisement, as well as encouraging positive measures of preservation and enhancement. Given their level of significance, there will normally be a presumption against the demolition or loss of a building or feature contributing to the character of the Conservation Area. The National Park Authority will encourage enhancement of Conservation Areas and their setting, including the repair or restoration of important features, the improvement or removal of unsightly features, and measures that

¹²⁹ <http://www.exmoor-nationalpark.gov.uk/planning/conservation-areas>

better reveal the significance of the asset. An emphasis will also be placed upon the use of local traditional, natural and, where available, local materials and traditional methods of construction and design. Article 4 Directions in Conservation Areas are a means of controlling alterations to features including roofs, doors, windows and chimneys and will be used where appropriate.

- 5.100. To be consistent with the conservation and enhancement of the cultural heritage of the National Park, and policy CE-D3, proposals which may affect Exmoor's settlements whether or not they are currently designated as Conservation Areas, should seek to preserve or enhance their historic or architectural interest, their character and appearance.

LISTED BUILDINGS

- 5.101. Any proposals relating to Listed Buildings or their settings may require listed building consent and/or planning permission from the National Park Authority. As the Authority has a statutory duty to protect Listed Buildings, the presumption will be to preserve them, and demolition or loss of Listed Buildings will only be permitted in exceptional circumstances, where prior recording will be a requirement. Whilst the protection of Listed Buildings is paramount, the National Park Authority recognizes that historic buildings have been altered and extended over time and that the need for change will continue and may sometimes be necessary to ensure its continued upkeep. This may include adaptation or re-use to take account of climate change or bringing the building back into viable use. Any proposals for alteration, repairs, extension (including internal works or works within the curtilage) or change of use must be compatible with the listed building's historical or architectural interest. The character of a listed building is linked to its setting, and development proposals which adversely affect settings will not be permitted.

ARCHAEOLOGICAL ASSETS

- 5.102. Where an application includes or has the potential to include heritage assets with archaeological interest, including Scheduled Monuments, sites on the HER, those within historic settlement cores¹³⁰, within the curtilage of a listed building, historic field patterns or historic farmsteads, applications must include an appropriate desk-based assessment and, where necessary, a field evaluation which may need to include full excavation, examination and recording and public involvement where appropriate. Applicants are encouraged to discuss their plans at an early stage with the National Park Authority who will advise whether proposals are likely to affect archaeological sites or features and whether further work is necessary. If archaeological remains are encountered during development, the National Park Authority will offer advice and assistance on their importance and the appropriate course of action. Archaeological assessments and field evaluations should be in accordance with the Conduct of Archaeological Work and Historic Building Recording within Exmoor National Park (Annex 1).
- 5.103. Sites of archaeological significance on Exmoor should be preserved wherever possible. However, although all surviving archaeological remains are irreplaceable, they are not all of equal importance. Preservation should be based on levels of significance, and priority should be given to those sites considered to be of national importance, especially as many of these are not protected by designation as Scheduled Monuments. The desirability of preserving an ancient monument and its setting is a material consideration whether it is scheduled or not. Development proposals adversely affecting the integrity or setting of a Scheduled Monument, or other sites, or remains considered to be of national importance will not be permitted.
- 5.104. A great many of Exmoor's archaeological sites are of local value and, in considering applications likely to affect such sites, the National Park Authority will assess their significance and the desirability of their preservation. Applicants will be required to provide adequate information to enable the National Park Authority to assess the significance of a site or feature. Adverse impacts on heritage assets of local importance should be avoided and development will only be permitted where the archaeological interest is capable of being preserved in situ. Where, in exceptional circumstances, an application is approved which will result in the loss (wholly or in part) of heritage assets then developers must record and make publically

¹³⁰ Historic settlement cores are shown on the settlement inset maps – these areas are defined using the late 19th century 1st Edition Ordnance Survey Maps (1:2500 scale)

available this information to advance understanding of the significance of the assets. However the ability to record evidence of the assets will not be a factor in deciding whether loss of the asset should be permitted.

- 5.105. There may be other occasions where a threat to archaeological remains occurs from an activity which is permitted development¹³¹. In such cases the archaeological interest will be protected through the withdrawal of permitted development rights under Article 4 of the General Permitted Development Order which will then require an application for planning permission to be made.

HISTORIC PARKS AND GARDENS

- 5.106. Historic Parks and Gardens are significant heritage assets and, whilst there are no statutory controls over these sites, Government policy is that they should be protected and enhanced under the planning system. Any development proposals which would harm the special features and qualities of Historic Parks or Gardens or their settings will not therefore be permitted. A number of locally important designed landscapes and historic gardens are also identified on the Exmoor HER. The National Park Authority will protect and encourage positive measures of enhancement in designated parks and other gardens of historic interest.

LOCAL HERITAGE ASSETS

- 5.107. A great many of Exmoor's heritage assets are of local value and in considering applications likely to affect such sites, the National Park Authority will assess their significance and the desirability of their preservation. Applicants will be required to provide adequate information to enable the National Park Authority to assess the significance of a site or feature. Adverse impacts on heritage assets of local importance should be avoided.

HISTORIC FARMSTEADS, HISTORIC FARMS AND FARM BUILDINGS

- 5.108. A survey¹³² of farmsteads on Exmoor has identified those considered to be of the greatest historic interest, which are recorded on the Proposals Map¹³³. Four historic farmsteads have been designated as Conservation Areas.

CLIMATE CHANGE

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

CONSIDERING PROPOSALS AFFECTING HERITAGE ASSETS

- 5.111. Heritage assets should be identified at pre-application stage. Applications should describe the significance of any heritage assets affected, including any contribution made by their setting.

¹³¹ Town and Country Planning (General Permitted Development) Order 1995

¹³² Architecton 1997: 'Exmoor Farmsteads: An Evaluation of Old Steadings within Exmoor National Park'

¹³³ Historic Farmsteads were given a status of grade 1, 2/1, 2/2, 3 and 4. Only those graded 1 and 2/1 (as 'outstanding') are shown on the Proposals Map

The level of detail should be proportionate to the assets' importance in order to understand the potential impact of the proposal on their significance. The Exmoor Historic Environment Record must be consulted as a minimum. In some circumstances, a Heritage Assessment may be required. The National Park Authority can provide further guidance on this. Early discussion with officers is also encouraged.

CE-D3 CONSERVING HERITAGE ASSETS

- 1. Development proposals will not be permitted where they lead to harm to, or loss of heritage assets (defined in CE-S4), their setting, or any structures or features of importance to their character. Development proposals affecting heritage assets will only be allowed where it can be demonstrated that they conserve and enhance the heritage asset including:
 - a) its character, special interest, integrity, appearance, and quality;**
 - b) ensuring they do not adversely affect the settings of heritage assets and traditional or distinctive features;**
 - c) the use of building materials that are traditional to the area;**
 - d) promoting the understanding and enjoyment of the heritage asset or better revealing their significance, where appropriate;**
 - e) adapting to climate change where required to safeguard the heritage asset, and where their special interest will be conserved;**
 - f) measures to mitigate climate change only where they would not harm the special interest or appearance of the heritage asset;**
 - g) enabling heritage assets that are redundant or at risk to be brought back into a viable use in ways that are consistent with their conservation; and**
 - h) making a positive contribution to local character and distinctiveness.****
- 2. Proposals likely to affect heritage assets with archaeological interest or potential interest including historic buildings should be supported by an appropriate desk-based assessment. In appropriate cases, developers will be required to arrange for archaeological field evaluations before applications are determined. Assessments and field evaluations should be in accordance with the Conduct of Archaeological Work and Historic Building Recording within Exmoor National Park.**
- 3. In exceptional circumstances, where development is permitted which has the potential to affect heritage assets of local interest, development will only be allowed where the need for it outweighs the asset's intrinsic importance. The archaeological interest will be preserved in situ, but where this is not justifiable or feasible, provision must be made for appropriate preservation by record.**

THE CONVERSION OR STRUCTURAL ALTERATION OF BUILDINGS

PURPOSE OF THE POLICIES

5.112. Policies CE-S5 and CE-S6 set out the principles that should be applied to the conversion of existing buildings (identified as traditional and non-traditional), to enable a change of use that conforms with other policies in this plan, or for structural alterations to existing buildings.

NATIONAL POLICY CONTEXT

5.113. National policy encourages the reuse of existing buildings to support the transition to a low carbon future¹³⁴ as it generally provides environmental savings compared to demolition and new construction¹³⁵.

CONTEXT

5.114. It is widely recognised that existing buildings are a significant resource and enabling adaptive reuse through conversion can help to achieve sustainable development objectives and provide long term benefits for the individual building.

TRADITIONAL BUILDINGS

5.115. Traditional buildings are important assets that contribute to the cultural heritage of the National Park and include a range of building types. The term 'traditional buildings' refers to mostly older buildings of solid wall construction built of natural and often local materials e.g. stone, cob, brick, lime mortar and render, that on Exmoor usually predate the Second World War¹³⁶. This term may also include buildings of historic interest including those circumstances where the use of certain materials may be long established, for instance some timber buildings and community buildings clad in corrugated iron sheeting. It will be for the National Park Authority to determine whether a building is considered to be 'traditional' based on its historic and/or vernacular merit and its contribution to the National Park.

5.116. Many traditional farm buildings on Exmoor are historically significant and contribute to local distinctiveness and landscape character. The National Park Authority encourages the continuation of the original use and sensitive repair of such buildings using traditional materials. Advice can be provided on repair and the availability of grants including through agri-environment schemes¹³⁷.

THE CONVERSION OF TRADITIONAL BUILDINGS

5.117. Where possible, the retention of the original use of traditional buildings is the preferred approach; however this is not always feasible for reasons that include modern agricultural practices and changing lifestyles. For example, the fragmentation of farms has resulted in some smaller holdings with a range of traditional buildings no longer required for their intended use, or on larger holdings where their use has been replaced by modern agricultural buildings that can accommodate larger numbers of stock for over-wintering. Dwindling congregations have also resulted in the closure of a number of chapels across the National Park. Other traditional buildings on Exmoor include former industrial buildings such as mills and storage buildings.

5.118. The sympathetic adaptation of these and other buildings in the National Park can ensure that the long term maintenance of the building fabric can be sustained. Proposals should seek to ensure that the capacity and structure of the building is realistic for the proposed use. Original features that provide evidence of their former use should be retained and minimal changes made to the building fabric to ensure the historic and architectural integrity of the building and its setting in the landscape are conserved. In some circumstances, an impact assessment prior to the determination of an application may be required. A condition may also be attached to a planning permission to ensure that the buildings and features of interest are recorded prior

¹³⁴ Para 17 NPPF 2012 DCLG

¹³⁵ The Greenest Building: Quantifying the Environmental Value of Building Reuse: National Trust for Historic Preservation

¹³⁶ In terms of traditional farm buildings 'traditional' describes farm buildings pre-dating 1940 – Conversion of Traditional Farm Buildings: A Guide to Good Practice. English Heritage (2006)

¹³⁷ Farming for the historic environment – Make the most of Environmental Stewardship: Natural England & English Heritage (2009)

to the commencement of development. The level of recording required will be based upon the historic significance of the building and the intended use.

- 5.119. In many cases proposals for the conversion or structural alteration of a traditional building are likely to require a structural survey and an ecological survey as part of a planning application. However, some traditional buildings may be considered too sensitive to convert to any alternative use due to reasons of their landscape setting, heritage, or wildlife value (see policies CE-S1, CE-S2 & CE-S4)¹³⁸.
- 5.120. Where a traditional building is regarded as structurally unsatisfactory for conversion, i.e. if substantial reconstruction, extension or alteration is proposed or where the building is derelict, has no roof or is structurally unsound; the proposal will be classified as a 'new build' rather than 'conversion' and will need to accord with the relevant policies set out in this Local Plan. Such proposals should still seek to retain the historic fabric of the structure. It may be preferable for some ruined buildings to remain with measures in place to stabilise their structure where they are of landscape or historic value.
- 5.121. Traditional buildings require sympathetic design ensuring that traditional approaches to materials and detailing are taken to conserve the intrinsic quality, character and appearance of the building. This applies to all traditional buildings in the National Park including those which have a special architectural and historic interest, such as: listed buildings and structures, those within Conservation Areas, Historic Farmsteads, or those identified as a heritage asset on the Historic Environment Record (see policies CE-S4 and CE-D3). Conservation Area Character Appraisals are a useful source of information relating to the architecture and aspects of design that are important within each Conservation Area.
- 5.122. Attention to the detailed design and standard of craftsmanship and materials used can help to ensure a sensitive conversion scheme or alteration to a traditional building, and the following key points should be addressed:
- a) Windows and doors should be constructed of timber, and of an appropriate design and finish that reflects the age, character and former use of the building. Where there are existing windows and doors (including metal windows) they should be repaired and retained rather than replaced – if this is not possible then they should be replicated. Where the Authority considers it to be appropriate, former shutters for openings in barns should be retained as shutters where a glass window is inserted into an existing opening.
 - b) The use of lime-based mortar and render will be required to allow movement of traditional buildings and prevent the accumulation of damp whilst providing an attractive and authentic visual quality.
 - c) Where cob is the existing structural material then it will be expected that locally sourced cob will be used in the conversion for the repair of existing walls.
 - d) Roofing materials should be retained where it is a traditional natural material such as clay pantiles, natural slate or wheat-reed thatch – new roofing should use appropriate natural traditional materials. In certain circumstances – such as the conversion of buildings for ancillary uses – the use of corrugated iron or steel sheeting may be acceptable as a roofing material¹³⁹ where no other traditional roofing material is present.
 - e) The creation of new openings should generally be avoided. If rooflights are considered not to harm the appearance or historic character of the building they should be kept to a minimum on the least prominent roof slope, and use a flush 'conservation' type rooflight.
 - f) The extent of the curtilage should be minimised and any works sensitively incorporated to avoid adverse impacts on the immediate setting and character of the building and its visual impact on the wider landscape.
 - g) All utility services will be expected to be routed underground in accordance with policy AC-D5 Fixed Line Transmission Infrastructure. This may require an archaeological watching brief.

¹³⁸ Living Buildings in a Living Landscape – finding a future of traditional farm buildings: English Heritage & The Countryside Agency (2006)

¹³⁹ Corrugated galvanised steel sheeting (also referred to as corrugated iron or tin) has been widely used as a roofing material since the middle of the 19th century and has become part of the farm building vernacular – when using this material it should not have a plastic/polyester coating but either left to weather or painted in a suitable colour agreed with the Authority. Modern box-profile sheeting is considered to be an inappropriate material for the reuse of traditional buildings

- 5.123. Applicants are encouraged to seek advice on proposals for traditional and historic buildings from officers at the National Park Authority. Further detailed guidance can be found in the English Heritage publication *Conversion of Traditional Farm Buildings* (2006) or successor guidance.
- 5.124. To avoid harmful impacts on the historic and architectural interest of traditional buildings, any adaptations, but particularly change to residential use, should ensure that the simplicity and design of the building and its setting are retained. This can be achieved by avoiding overly intensive uses and excessive internal partitioning of the building and retaining some spare capacity for ancillary purposes. For example a whole farmstead complex of traditional buildings should not necessarily be converted, leaving some parts unconverted to enable space for storage, or continuing agricultural use, and to ensure the retention of some of the original vernacular form (HC-D4 Conversions in the Open Countryside and RT-D4 Non-serviced Accommodation). This approach avoids the pressure for additional new build development in the future and will be decided on a case by case basis.
- 5.125. Isolated traditional farm buildings, which are not well related to farmsteads or building groups are particularly sensitive in terms of their setting and are not suitable for adaptive uses requiring access, parking, installation of utility services or provision of a 'curtilage', as such additions can detrimentally impact the setting of the building and landscape character of the area. It is often advisable, therefore not to change the use of such buildings. However in some cases, their conversion to simple camping barns often referred to as 'stone tents', may offer a potential new use, where a proposal would meet the requirements of policy RT-D6 Camping Barns.
- 5.126. Where permission is granted by the National Park Authority for the conversion of a traditional building, a condition will be attached to remove permitted development rights granted by the General Permitted Development Order¹⁴⁰, in respect of alterations and extensions to residential properties as this will help to ensure that the character and appearance of these buildings are conserved.
- 5.127. Proposals for extensions should, in the first instance, seek to accommodate provision within existing outbuildings before considering new additions. New additions to converted buildings may only be considered where the historic significance of the main building and its setting are not compromised, and where the extension is demonstrably subservient (CE-S7 Design & Sustainable Construction Principles and CE-S4 Cultural Heritage). Extensions that are clearly residential in nature, such as conservatories and porches, are considered to be inappropriate additions to those traditional buildings which were built for non-residential purposes, particularly those associated with farms¹⁴¹.
- 5.128. Applicants considering the conversion or structural alteration of traditional buildings will need to ensure that the proposal accords with other policies in this plan, including Policy CE-S1 Landscape Character, CE-S2 Biodiversity and CE-S4 Cultural Heritage and Historic Environment.

¹⁴⁰ Town & Country Planning (General Permitted Development) Order 1995

¹⁴¹ *Conversion of Traditional Farm Buildings: A Guide to Good Practice* - English Heritage (2006)

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

1. The conversion or structural alteration of traditional buildings will be permitted where the proposal:
 - a) clearly demonstrates that the building is capable of conversion without substantial reconstruction;
 - b) is suitable for the existing building in terms of the intended use and the intensity of that use, in relation to its capacity, structure and character without substantial alteration;
 - c) accords with the relevant policies in this plan in terms of the intended use;
 - d) ensures the historic fabric, and architectural interest of the building and its setting including the retention of existing traditional and historic features are conserved and enhanced (where the building is identified as a heritage asset on the Exmoor National Park Historic Environment Record proposals should be consistent with policies CE-S4 and CE-D3);
 - e) reflects the character and significance of the building and conserves its traditional appearance through sensitive design and the use of traditional materials, detailing and construction principles, and
 - f) maintains or replaces bat and barn owl roosts.
2. Conditions will be attached to remove permitted development rights granted by the General Permitted Development Order 1995 to ensure the character and appearance of traditional buildings are conserved.
3. New extensions to traditional buildings will only be permitted where they accord with the relevant policy in terms of the intended use and CE-S7 Design & Sustainable Construction principles.
4. The conversion of isolated traditional buildings that are not part of a building group, such as a farmstead or hamlet will only be permitted where it accords with the tests in this policy and the provisions set out in Policy RT-D6 for change of use to camping barns.

NON-TRADITIONAL BUILDINGS

5.129. Modern buildings of non-traditional construction are generally built post-war. Where policies in this plan provide for the reuse of such buildings, proposals should demonstrate that there are no traditional buildings available for conversion or where traditional buildings that are present are unsuitable due to reasons of capacity, visual impact, landscape setting, wildlife interests or historic importance.

THE CONVERSION OF NON-TRADITIONAL BUILDINGS

- 5.130. Although there is a range of post-war buildings in the National Park, this category also includes modern agricultural buildings (SE-S3 Business Development in the Open Countryside). The fabrication and structural limitations of modern agricultural buildings can constrain the range of adaptive uses that may be suitable. However, certain employment or recreation uses can be acceptable where the existing building is of permanent construction and the proposed use will not require any substantial reconstruction. Furthermore, there should be no unacceptable impacts on the National Park, local amenity or the day to day operation of the farm or land-based business (SE-S3 Business Development in the Open Countryside). Opportunities to provide environmental and visual enhancement including through design, landscaping, and reducing the size of the building will be encouraged.
- 5.131. The reuse of a modern agricultural building should not necessitate the need for another agricultural building, and proposals for the reuse of agricultural buildings for non-agricultural purposes will be required to demonstrate why the building is redundant or no longer needed. Where permission is granted for reuse, conditions may be attached to withdraw permitted development rights for the construction of new farm buildings on the holding to prevent the proliferation of such buildings which can have a detrimental impact on landscape character.
- 5.132. Buildings that have been constructed for less than 10 years would not normally be considered for conversion and/or change of use. In such circumstances, the degree to which the building has been used for the intended agricultural purpose will be taken account of. Where the

National Park Authority has reasonable cause to believe that an applicant has, with the benefit of permitted development rights constructed a new farm building, with the intention of early conversion to another use, it will be appropriate to investigate the history of the building to establish whether it was ever used for the purpose for which it was claimed to have been built (SE-S3 Business Development in the Open Countryside).

CE-S6 PRINCIPLES FOR THE CONVERSION AND STRUCTURAL ALTERATION OF NON-TRADITIONAL BUILDINGS

- 1. The conversion or structural alteration of non-traditional buildings will be permitted in accordance with relevant policies in the Plan if traditional buildings are considered by the National Park Authority to be incompatible with the intended purpose or no such buildings are present.**
- 2. Proposals should demonstrate that:**
 - a) the building is of permanent and substantial construction and capable of conversion without significant reconstruction and alteration;**
 - b) the building is suitable for the proposed use including the proposed intensity of use in terms of its capacity, and structure;**
 - c) landscape character (CE-S1), wildlife interests (CE-S2), and cultural heritage (CE-S4) are conserved or enhanced through measures to provide environmental and visual enhancement, including maintenance or replacement of any bat and barn owl roosts that may be present; and**
 - d) the building incorporates design and sustainable construction principles consistent with policy CE-S7.**
- 3. New extensions should accord with the relevant policy requirements in terms of the intended use and CE-S7 Design & Sustainable Construction Principles.**

DESIGN AND SUSTAINABLE CONSTRUCTION PRINCIPLES

PURPOSE OF THE POLICY

5.133. Policy CE-S7 Design and Sustainable Construction Principles, sets out the principles guiding the design and construction of new development. It promotes high quality sustainable design which conserves and enhances the National Park by ensuring new development reflects and complements Exmoor's landscape and settlement character.

NATIONAL POLICY CONTEXT

5.134. High quality development, achieved through good, inclusive design and efficient use of resources¹⁴², is firmly embedded in national planning policy as a key element of achieving sustainable development to improve the character and quality of a place; contributing to the improvement of places for people with good standards of amenity to create attractive places to live, work and visit. The design of developments should respond to local character, reflect local surroundings and materials, to establish a strong sense of place whilst not discouraging appropriate innovative design.

5.135. Good architecture and appropriate landscaping are important elements of the overall design to integrate new development into the natural, built and historic environment, whereas the safety, accessibility and overall inclusiveness of the design is acknowledged as going beyond aesthetic considerations to address connections between people and place.

CONTEXT

5.136. Within the National Park development patterns and forms should respond to Exmoor's traditional vernacular style. All development should be of high quality, attractive and well-designed so that it works well in the long term by paying attention to detail; giving consideration to layout, orientation, siting, density, scale, materials, landscaping, architectural detailing and conserves and enhances the area.

DESIGN STANDARDS FOR HOUSING

5.137. Good design should also address the relationship between people and place and how people move between areas and access employment and other key services. Developments should be safe and accessible for people who live, work and visit and should, where appropriate provide benefits for health and well-being such as open space for recreation, footpaths, and cycle ways. Secured by Design¹⁴³ aims to design out crime through a number of principles for new development including: layout, landscaping, linking with its surroundings, and natural surveillance.

5.138. Design principles should also address social and environmental concerns, to ensure that buildings are safe, accessible and user-friendly. Policy HC-S1 Housing seeks to ensure that new residential development meets the Lifetime Homes¹⁴⁴ Standard. This standard is a set of 16 criteria that aim to provide solutions to enable good design that is functional, enables independence and improves quality of life. A Lifetime Home will introduce adaptability into the housing design and layout so that homes are able to suit the changing needs of households.

FORM, CHARACTER AND LAYOUT

5.139. The design of new development should reflect or reinterpret the traditional vernacular found on Exmoor. Although there may be particular circumstances which may direct a traditional response, it is considered that new development should be 'of its time,' it is important that innovative and contemporary designs should reinforce local distinctiveness to ensure that new buildings and development successfully fit in with their context, and continue to inspire building designs of exceptional quality in the future.

5.140. The design of new development will therefore be expected to be of the highest quality with some flexibility in terms of how this achieved – for example traditional materials, such as slate

¹⁴² NPPF 2012 DCLG

¹⁴³ Secured by Design Principles 2004 - Association of Chief Police Officers (ACPO)

¹⁴⁴ www.lifetimehomes.org.uk

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

EXTENSIONS

- 5.141. Where extensions to existing buildings are proposed, the design should usually ensure that such additions are subservient to the main building and that the roofline reflects the form and symmetry of the original. These measures ensure that the scale and massing of the extension are not disproportionate to the original, and do not over dominate the setting of the building in its wider context.
- 5.142. Proposals to extend traditional buildings should have particular regard to the historic character and architectural interest of the building through use of traditional materials and detailing that reflect the vernacular of the original building. Extensions that are clearly residential in nature, such as conservatories and porches, are considered to be inappropriate additions to those traditional buildings which were built for non-residential purposes, particularly those associated with farms¹⁴⁵.

LANDSCAPE CHARACTER, DENSITY AND CAPACITY

- 5.143. Development should enhance local landscape character (see policy CE-S1) and distinctiveness by ensuring that development takes account of landscape in terms of topography, existing landscape elements, and aspects. Landscape character assessments can help achieve this by evaluating key design features such as materials and arrangements of buildings.
- 5.144. Vernacular architecture has a strong relationship with landscape character and reinforces local distinctiveness, whilst providing a basis for the design of new development. Where there are variations in underlying geology and landform, there are identifiable links between the siting, design and materials of buildings in landscape character types and/or areas. The scale and proportion of buildings on Exmoor has generally been determined by the limitations of topography, local building materials and construction methods which has established a scale and form which the design of new buildings should reflect.
- 5.145. Exmoor's buildings and settlements have generally developed 'organically' over time, and the centre of many Exmoor towns and villages have high building densities. As a priority, the density of new development will be based upon a contextual approach to reflect the density of existing historic patterns of development to help secure the conservation and enhancement of Exmoor's built environment; this should also ensure the efficient use of land whilst ensuring there is sufficient private and/or public open space nearby. Some post-war and modern developments have failed to reflect the layout and density of existing settlement patterns and this has resulted in the detrimental 'suburbanisation' of some parts of Exmoor's settlements.
- 5.146. A Landscape Sensitivity Study¹⁴⁶ was produced as part of the evidence base for the Local Plan – it has assessed the capacity for small scale housing development over the long term within or adjacent settlements. Policies guiding the direction of new development and future housing (Policies GP4 and Section 7 Thriving Communities respectively) will be informed by this study. The Landscape Sensitivity Study includes design recommendations in terms of scale, layout and massing within some areas of low or moderate sensitivity. Proposals will be expected to incorporate these recommendations. The use of design briefs will be encouraged within moderate areas of sensitivity in National Park settlements, as identified by the study. This will help to ensure that the highest standards of design are achieved, and will be exemplars for future small scale housing development on Exmoor.

STREET DESIGN

- 5.147. The design of streets has a significant influence on the layout and setting of a development. Streets are distinct from roads, in that the importance of 'place' is the primary focus, rather than movement. The design of new streets in association with development is relatively limited in the National Park due to the low levels of development overall, and fewer schemes that

¹⁴⁵ Conversion of Traditional Farm Buildings: A Guide to Good Practice - English Heritage (2006)

¹⁴⁶ Exmoor National Park Landscape Capacity Study 2011

require new highway/street infrastructure. However, the materials, scale and proportion of new streets and their relationship with buildings will be fundamental to the success of the final design and its contribution to local distinctiveness. Streets should be designed to reflect local designs and details, and respond to the historic form and layout of existing streets¹⁴⁷. Surface materials are significant in helping to reinforce local distinctiveness, and may also be used sympathetically to delineate shared spaces where pedestrians have priority over traffic.

- 5.148. The excessive or insensitive use of highway signage and other street furniture has a detrimental impact on the success of the street as a place. Within the National Park it is particularly important to limit the visual impact of highway infrastructure such as the inappropriate use of kerbing, signs, road markings and street furniture which can have a detrimental urbanising effect on Exmoor's high quality built and natural environment¹⁴⁸.
- 5.149. The traditional streetscape character of existing streets in settlements across the National Park is an important part of Exmoor's built heritage. The particular features that contribute to the streetscape will vary according to the settlement form and pattern, landscape character and underlying geology. Proposals should conserve or enhance the streetscape through positively reinforcing traditional features including boundary treatments such as hedgerows or stone walls. The removal of such features should be avoided where it would individually or cumulatively impact on the streetscape.

LANDSCAPING

- 5.150. The landscaping of a site, including tree and shrub planting can help to ameliorate the impact of new development on landscape character. Such works can also have benefits for wildlife and enhance biodiversity. They can also provide shelter to help reduce heat loss from buildings, and shade to help with cooling - contributing to the sustainability of the development. Landscaping Details have to be provided with the submission of development proposals for outline and full planning permission and for the approval of reserved matters. This should illustrate details relating to the retention of existing trees, hedges and vegetation, in addition to the long term structural planting and maintenance¹⁴⁹. An assessment of landscape proposals is also required as part of the Design and Access Statement (please see para 5.164 below).

MATERIALS, DESIGN ELEMENTS & DETAILING

- 5.151. The use of traditional, natural materials is critical in ensuring that the appearance of new developments conserves and enhances the quality and character of the built environment. The National Park Authority will therefore expect the use of traditional vernacular materials such as natural slate and combed wheat reed thatch for roofs, building stone and/or lime render for walls. Lime based materials including lime mortar and render should always be used for new development built of stone or for conversions of traditional buildings. These natural materials traditionally used on Exmoor take on a 'weathered' appearance with time which is aesthetically pleasing.
- 5.152. It is clear from extensive consultation, that many people favour natural sustainable materials, especially those that can be sourced relatively locally. There is some cross over between traditional materials and local sustainable materials, such as local sources of building stone, and wheat reed for thatch and where available, local sources of such materials should be sought. Policy CE-S8 encourages the working of small scale quarries to provide local sources of building stone within the National Park.
- 5.153. Other local sustainable materials identified¹⁵⁰ include: timber, earth and cob, straw bales, and green roofs. There is an opportunity to derive both an economic benefit to the Exmoor area by sustainably exploiting these local building materials, and to enable a reduction in carbon emissions by using materials which are derived locally and minimally processed. Limestone quarries operate mainly on the Mendips in Somerset, and lime-based materials (for lime render or putty) can be sourced within Somerset and Devon.
- 5.154. Timber is one of the most versatile materials as it can be used structurally, as cladding, and as roofing shingles. The National Park Authority will encourage the use of natural sustainable

¹⁴⁷ Streets for All – South West: English Heritage, Department for Transport, Cleaner Safer Greener Communities 2005

¹⁴⁸ Manual for Streets; Department of Transport 2007

¹⁴⁹ Requirements for the Submission of Planning and Other Applications (Exmoor National Park Authority)

¹⁵⁰ Audit of Local Sustainable Construction Materials in the Greater Exmoor Area

materials in the design of new developments particularly where local sources of such materials are used. The use of locally sourced materials and sustainable construction methods can also benefit the local economy by encouraging existing land based businesses to diversify (e.g. timber processing or farming businesses) and new businesses to be created.

- 5.155. In some cases, painted corrugated metal sheeting may be an appropriate traditional material for instance for roofing small buildings such as sheds and garages. Sustainable building materials which are formed from reconstituted or recycled materials are supported in principle, however they will be considered in terms of their impact on local distinctiveness and their contribution to the built character of the area.
- 5.156. Some materials are not considered appropriate in the National Park for aesthetic and environmental reasons. The National Park Authority expects that windows and doors should be made of timber since this is a both a traditional and sustainable local material which has the potential to be grown locally. Timber detailing (windows, doors, weatherboards etc) when in hardwood or pre-treated, can be repaired and have a long lifespan. There are examples of wooden windows on Exmoor which have lasted for well over 100 years. Other materials may be considered in exceptional circumstances (e.g. in the case of some minor extensions to post-war/non-traditional buildings where existing materials may indicate such consideration) where it can be demonstrated that there will be no adverse impact on local character and the design is of the highest quality.
- 5.157. The treatment of individual design elements is of critical importance to a successful overall design and should be considered once the character of an area has been adequately assessed and key principles of scale massing and form have been addressed. The use of materials and detailing of elements such as doors and windows will have a significant bearing on how well a new development blends with its surroundings. The National Park Authority will seek to ensure that such detailing will enhance the design of the development; doors and windows in particular will be expected to be timber and in a style and arrangement which contributes to and strengthens the local character.

SUSTAINABILITY STANDARDS

- 5.158. Sustainable design and construction techniques are fundamental to achieving development which takes a long term approach to minimising impacts on the environment and adapting to environmental change. This includes minimising energy use through energy efficiency measures and incorporating renewable energy systems (see CC-S3 Low Carbon & Renewable Energy).
- 5.159. The Code for Sustainable Homes and BREEAM (Building Research Establishment environmental assessment method) are widely recognised sustainability standards for residential and non-residential developments. Each uses a rating system with minimum standards to be achieved for each rating. Benefits to the environment are achieved through reduced greenhouse gas emissions, better adaptation to climate change, reducing consumers overall environmental footprint. Proposals that incorporate these nationally prescribed standards will be supported where they are consistent with good design.
- 5.160. The efficient use of resources is an important principle of sustainable construction; re-using existing buildings or building materials for example reduces the need to manufacture and/or win new materials for construction and therefore reduces the contribution to climate change. Sharing services and facilities on larger developments helps to ensure the efficient use of resources and can reduce the visual impact overall. Maximising the site's resources and incorporating passive design techniques also makes effective use of natural energy resources through ground and air source heating, natural daylight, solar energy and heat gain, ventilation and cooling.
- 5.161. Sustainability standards include water conservation measures and adaptation to the threat of increasing risks from various forms of flooding (policies CC-D1 Flood Risk and CC-D3 Water Conservation) – taking into account the long term impacts of climate change. Water conservation technology can vary to relatively simple low-tech measures to installing grey water systems in buildings – helping to minimise the volume of potable water used by homes and businesses. In terms of flood risk adaptations, the implementation of on-site sustainable drainage systems (SuDS) is an important technique to manage surface water run-off through softer engineering solutions that are similar to natural drainage systems and have wider

environmental benefits including: providing wildlife habitats, and minimising environmental damage and diffuse pollution¹⁵¹.

- 5.162. Design principles incorporate and support sustainable building methods that help reduce carbon emissions and future-proof against the impacts of climate change¹⁵². National planning guidance advises that when setting local requirements for sustainable construction, Local Planning Authorities must be consistent with the Government's zero carbon buildings policy and adopt nationally prescribed standards¹⁵³. Adopting these standards not only improves the sustainability of buildings in the long term but also impacts on affordability by reducing/lowering the running costs.
- 5.163. In light of proposed changes to Building Regulations, and the low levels of development within the National Park, it is not considered to be practical to set local requirements for sustainable construction. Proposals for new residential and non-residential development are encouraged to incorporate sustainable construction and passive design methods which not only address energy efficiency and seek to incorporate renewable energy technologies, but consider other sustainability issues such as waste, pollution, resource use, and health and well-being. Consultation has demonstrated clear support for incorporating sustainability requirements in new development, and reusing existing buildings and materials where appropriate (policies CE-S5 and CE-S6).

DESIGN & ACCESS STATEMENTS

- 5.164. Design & Access Statements (DAS) are required to accompany planning applications for major developments, one or more dwellings, or buildings with a floorspace of 100sqm or greater. The DAS should explain the design principles and concepts that have been applied to the proposed development as well as explaining how everyone will be able to use the proposed building or development. These statements provide developers and designers with an opportunity to demonstrate their commitment to good design, particularly how the development incorporates the key design principles set out in Policy CE-S7 below. Applicants should refer to the Exmoor Design Guide for further guidance.
- 5.165. Policy CE-S7 applies to all types of development except agricultural and forestry buildings; the design aspects of which will be considered under policy SE-S4 Agricultural and Forestry Development. In relation to the conversion of existing buildings proposals should accord with the principles set out in policies CE-S5 and CE-S6.

¹⁵¹ Environment Agency Policy (revised draft) – Sustainable Drainage Systems (SUDS) 2002

¹⁵² Paras 94, 95 NPPF 2012 DCLG

¹⁵³ Zero Carbon Strategies – Zero Carbon Hub 2013: The Government's aim is to achieve higher sustainable building standards through amendments to building regulations which will result in Zero Carbon Homes standard by 2016. Amendments to Part L of Building Regulations (Conservation of Fuel and Power) are expected in 2016 to meet on site targets for zero carbon homes by improving the energy efficiency of new homes and increasing use of low and zero carbon technologies, whilst any remaining emissions can be met through Allowable Solutions (paying into a carbon fund or investing in carbon saving projects associated with the development)

E-S7 DESIGN AND SUSTAINABLE CONSTRUCTION PRINCIPLES

- 1. Development proposals should deliver high quality sustainable designs that enhance the local identity and distinctiveness of Exmoor's built environment and landscape character and in doing so applicants will be expected to demonstrate the following design principles:**
 - a) All development should positively contribute to its setting in terms of massing, scale, height, orientation, density and layout.**
 - b) The materials and design elements of a building must be sympathetic to and reflect the identity of the local vernacular context.**
 - c) Design should reinforce landscape character and the positive arrangement of elements within the landscape in the design of new development including: planting and landscaping schemes, boundary treatments and surfacing. Existing elements such as trees, hedges and stone walls should be retained particularly where they are important features in the streetscape and/or characteristic of the local area.**
 - d) Development should incorporate measures which maintain, promote or restore biodiversity.**
 - e) Design should have regard to health and well being and ensure that sufficient public and/or private space is provided or available, and footpaths and cycleways are incorporated where appropriate.**
 - f) The layout and design of new streets and associated infrastructure should respond to local character and the scale, and proportions of the historic street pattern.**
 - g) The use and activity of the new development should not detrimentally affect the amenities of surrounding properties and occupiers including, overlooking, loss of daylight, overbearing appearance, or other adverse environmental impacts.**
 - h) The design and layout of new development should have regard to improving safety and reducing opportunities for crime. Residential developments of five or more dwellings should have regard to Secured by Design principles, where this complies with policy CE-D1 Protecting Exmoor's Dark Night Sky.**
 - i) Development should reinforce inclusive design and accessibility.**
 - j) Where possible, waste and resource use should be minimised through the reuse of materials and buildings, water efficiency, management of site waste, and provision of adequate storage and recycling facilities.**
 - k) All residential and non-residential developments should demonstrate the integration of passive design and sustainable construction methods to improve or generate energy efficiencies, reduce carbon emissions and future proof development against climate change impacts, including flood risk by incorporating measures such as sustainable drainage systems.**
 - l) New additions or extensions to existing buildings should accord with the relevant policy considerations in terms of the existing or proposed use of the building, and will only be permitted where :**
 - i) they will complement the form, character and setting of the original building;**
 - ii) the extension is appropriate in terms of scale and massing;**
 - iii) the roofline of any extension respects the form and symmetry of the original building; and**
 - iv) extensions to traditional buildings reflect and will not compromise the historic significance, character and appearance of the original building through the sensitive design and use of traditional materials, detailing and construction principles; and ensure the architectural interest, historic fabric and features, and setting of the building are conserved and enhanced.**

ADVERTISEMENTS, SHOPFRONTS AND PRIVATE ROAD SIGNS

PURPOSE OF POLICY

5.166. The conservation of traditional signage and shopfronts is supported by Exmoor's consultation evidence and advertisements can be important for the local economy. Policy CE-D4 sets out the approach for considering proposals for advertisements, shopfronts and private road signs as many of the same considerations apply to these types of proposals. It seeks to ensure that, individually and/or cumulatively they are consistent with the conservation and enhancement of the National Park and its special qualities.

NATIONAL CONTEXT

5.167. National Policy recognises that poorly placed advertisements can have a negative impact on the built and natural environment. The control of advertisements should be subject to control in the interests of amenity and public safety, this includes cumulative impacts¹⁵⁴. Not all advertisements require planning permission; the different classes of advertisement and controls including guidelines for National Parks, Special Areas of Advertisement Control and Conservation Areas are set out in regulations^{155,156}.

CONTEXT

5.168. The replacement or alteration of advertisements, shopfronts and private road signs may have a considerable impact on the surrounding area in terms of amenity and public safety. Avoiding the proliferation of advertisements and signs helps ensure the protection of the National Park (CE-S1 Landscape Character, CE-S4 Cultural Heritage and Historic Environment). Joint signing/advertising schemes and the use of existing structures to help avoid unnecessary additional free standing signs will be encouraged.

5.169. Tranquillity is a special quality of the National Park which includes the low level of noise pollution and Exmoor's dark night sky¹⁵⁷. The protection of Exmoor from light and noise pollution was also supported through consultation¹⁵⁸. To ensure the protection of this important asset, noise level will be a consideration in determining planning applications and regulation¹⁵⁹ of artificial lighting including those by illuminated advertisement will be applied. Additional controls usually apply to display on listed buildings and on the site of a scheduled ancient monument, as almost all development proposals in such cases will require listed building or scheduled ancient monument consent in addition to any advertisement control (CE-S4 Cultural Heritage and Historic Environment, CE-D3 Conserving Heritage Assets). The National Park Authority encourages early discussions on any proposals, which will include advice on whether permission may be required.

ADVERTISEMENTS

5.170. Advertisements are an important way of attracting customers and supporting the visitor trade, thereby helping the local economy. By their nature they are designed to attract attention but need to be carefully managed to ensure that, individually and/or cumulatively they are compatible with the context of Exmoor.

5.171. At present the whole of the National Park outside the centres of Dulverton, Lynton/Lynmouth and Porlock has been designated as an Area of Special Advertisement Control¹⁶⁰. This designation enables the National Park Authority to apply additional controls over the siting and appearance of most kinds of advertisements to ensure they are compatible with the

¹⁵⁴ NPPF 2012 DCLG

¹⁵⁵ For guidance on what advertisements require planning permission, restrictions and guidance please see Town and Country Planning (Control of Advertisements) (England) regulations (2007, DCLG)

¹⁵⁶ The term advertisement in this context includes: "any word, letter, model, sign placard, board, notice, awning, blind, device or representation, where illuminated or not ... used wholly or partly for ... advertisement, announcement or direction any hoarding or similar structure ... and anything else ... used, ... designed or adapted ... for use for the display of advertisements" – 336(1) of the 1990 Act, as amended by section 24 of the Planning Compensation Act (1991)

¹⁵⁷ Please refer to CE-D1: Dark Sky for further information

¹⁵⁸ 2010 Your Future Exmoor Community Consultation

¹⁵⁹ Town and Country Planning (Control of Advertisements) (England) Regulations (2007)

¹⁶⁰ As Defined under Section 221 of the 1990 Town and Country Planning Act

surrounding area. This includes that applicants must demonstrate a reasonable requirement for an advertisement, stricter limits on the height and size of some advertisements and that some classes of advertisement may not be displayed¹⁶¹.

SHOPFRONTS

5.172. Traditional shopfronts play an important role in contributing to the character and historic environment of Exmoor's settlements and for this reason, the National Park Authority will seek their retention in principle and restoration will be encouraged over replacement. In considering restoration of traditional shopfronts, or the provision of new, the replacement of or alterations to non-traditional shopfronts, the use of vernacular design, traditional materials and proportions appropriate to the scale of the building and its surroundings will be required to conserve or enhance the architectural character of buildings and the overall visual quality of the street scene.

PRIVATE ROAD SIGNS

5.173. Certain visitor attractions are eligible to use the Highway Authority's 'white on brown' tourist signs which are authorised by the Highway Authority, the National Park Authority are consulted on individual proposals which use this type of signage. Private road signs that are ineligible for Highway Authority signing are also recognised as an important means of advertising tourist and visitor enterprises by giving advance warning and directions. They too need to be individually and/or cumulatively managed to ensure they are compatible with the National Park purposes.

CONSIDERATIONS FOR PROPOSALS

5.174. If planning permission is required the National Park Authority will take into consideration amenity, and public safety issues. Applications will be closely examined to ensure the proposal is consistent with the area's designation as a National Park and, where applicable, special areas of advertisement control and/or conservation area.

AMENITY THROUGH DESIGN

5.175. Design which includes the size, scale, proportions, siting, positioning, colour, size of lettering or symbols, amount of text and type of materials used, will be controlled in the interests of amenity and/or public safety. Regulations state that advertisements should respect the landform and quality of the immediate surroundings including the natural contours, landscape character and background features against which they will be seen¹⁶². For this reason and to conserve and enhance the National Park, advertisements, shopfronts and private road signs should be designed to harmonise with the local area and setting and to reflect the high quality environment of the National Park. Advice is provided in the Design Guide on how best to achieve sympathetic design¹⁶³. On occasions this may require a change to standardised corporate signage. A further consideration will be to ensure that the proliferation of individually acceptable advertisements does not harm the appearance of the area. Amenity considerations should also include maintaining advertisements to a high standard.

PUBLIC SAFETY

5.176. In determining applications consideration must be given to the safe use of advertisements, shopfronts and private road signs and any impacts on transport including road users and pedestrians. In achieving its purpose to attract attention, consideration will also be paid to whether the advertisement, shopfront or private road sign itself or location proposed is likely to be so distracting or confusing that it creates a hazard or presents a danger to people in the vicinity. It should be kept in a safe condition and be removed safely when required. Crime prevention and detection are also relevant factors¹⁶⁴.

¹⁶¹ Please refer to the DCLG and ENPA websites for more information

¹⁶² Town and Country Planning (Control of Advertisements) (England) Regulations (2007)

¹⁶³ Please refer to ENPA website

¹⁶⁴ Further information on amenity and public safety considerations are provided by: Circular 03/07, Town and Country Planning (Control of Advertisements) (England) Regulations 2007 DCLG

CE-D4 ADVERTISEMENTS, SHOPFRONTS AND PRIVATE ROAD SIGNS

1. Traditional shopfronts will be retained and restoration will be encouraged where appropriate. Advertisements, restoration of *traditional* shopfronts or the provision of new, the replacement or alteration to *non-traditional* shopfronts, and private road signs will be permitted where it can be demonstrated that:
 - a) there will be no adverse individual or cumulative impact on the character and distinctiveness on both the locality and the National Park as a whole with regard to both visual amenity and tranquillity;
 - b) the size, scale, colour and siting are appropriate and the materials and design are of a high standard which conserve or enhance the character and appearance of the host building or site, the wider streetscape and landscape;
 - c) opportunities are taken to enhance existing buildings or the landscape through the redesign or removal of existing advertisements or fascia as appropriate; and
 - d) there will be no detrimental impact on public safety.

MINERALS

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

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

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

PURPOSE OF THE POLICIES

- 5.177. The National Park Authority is the Minerals Planning Authority within the National Park and is responsible for determining applications for minerals related development. Despite a long history of mineral extraction on Exmoor there are, at present, no operative mines or quarries within the National Park although stone is always in demand and deposits of silver, lead, copper and iron ore, in particular, may still exist. In addition, there are a number of disused quarries on Exmoor which were primarily used for local building stone. Policies therefore seek to encourage the small scale working or reworking of quarries, building and roofing stone.
- 5.178. Many of Exmoor's older buildings were constructed of the local Devonian Sandstone. However, due to the geology of Exmoor other stone is used at various localities – in the Lynton area grey sandstone was used and 'new red' sandstones in the eastern area of the National Park. Softer sandstones were also quarried near Porlock.

NATIONAL POLICY CONTEXT

- 5.179. The National Parks Circular¹⁶⁵ recognises that National Parks are a source of some minerals, including certain building stone and small quarries which provide building materials to maintain the character of the local built heritage. Quarry works may also provide employment within the Park boundary. It is important therefore that the need for minerals and the impacts of extraction and processing on people and the environment are managed in an integrated way.
- 5.180. The Government adopts a sustainable approach to minerals development and recognises the importance of a sufficient supply of material to provide infrastructure, buildings, energy and goods that are required. The National Planning Policy Framework recognises that since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation. This can be achieved by adopting a hierarchical approach to minerals supply, which aims firstly to reduce as far as practicable the quantity of material used and waste generated, then to use as much recycled and secondary material as possible, before finally securing the remainder of material needed through new primary extraction. Minerals development is different from other forms of development because minerals can only be worked where they naturally occur. Potential conflict can therefore arise between the benefits to society that minerals bring and impacts arising from their extraction and supply.

CONTEXT

- 5.181. Large scale mineral extraction is not appropriate in the National Park as it would have an adverse impact on National Park purposes. The Exmoor National Park Authority seeks to ensure sufficient levels of permitted reserves are available from outside National Parks owing to the major impact of modern mineral extraction on the landscape, wildlife, cultural heritage, public enjoyment and local communities. The National Park has therefore been working with both Devon and Somerset County Councils to ensure the needs of the Exmoor National Park are taken into account in their minerals planning including that the Local Aggregate Assessment for Somerset and Devon includes the National Park as appropriate.

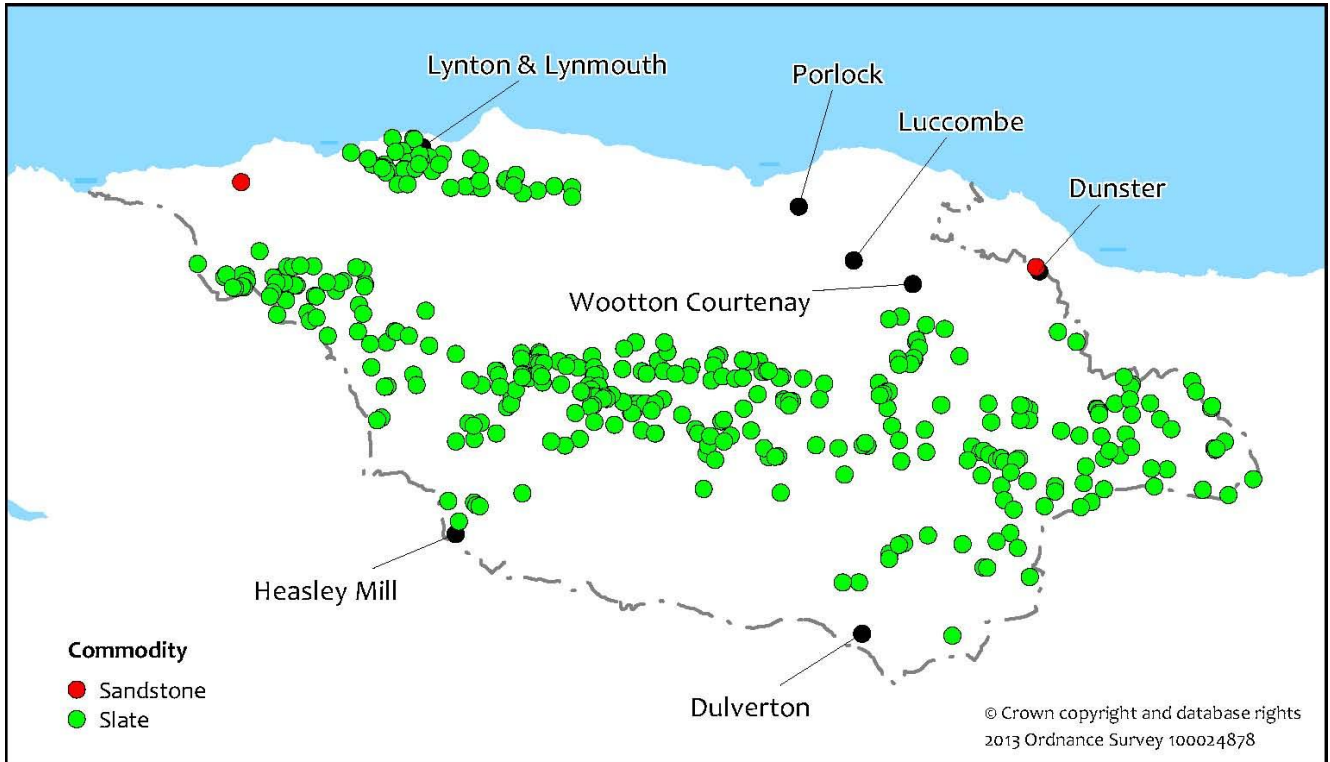
¹⁶⁵ Paras 141-145 The National Parks and the Broads Vision and Circular 2010

- 5.182. Small scale minerals extraction in the National Park could enable the provision of materials necessary for preserving traditional buildings and for maintaining and enhancing the character of settlements and the landscape of the National Park. Consultation has indicated the need for local building material for the conservation and repair of buildings and structures of historic and cultural importance. Both national policy and policies within this plan encourage developers to use traditional local materials in development proposals. Some materials can be salvaged while quarries just outside the National Park are another valuable source. However, these options are not always practicable, economic or suitable. Stone, for instance, is most appropriate when it is of the same composition as nearby traditional building stone. To achieve a supply of local building stone the National Park Authority will provide for the small-scale mineral extraction or the reopening of disused quarries in appropriate circumstances. Consideration will need to be given on how to meet any demand for small scale extraction of building stone at, or close to, relic quarries needed for the repair of heritage assets, taking account of the need to protect designated sites. In accordance with government guidance it is recognised that there will be a need for a flexible approach to the potentially long duration of planning permissions reflecting the intermittent or low rate of working at many sites.
- 5.183. All proposals will be subject to a requirement to include a scheme for high quality restoration and aftercare of the worked land. Such schemes should seek to achieve the conservation and enhancement of the National Park including for geodiversity and biodiversity, in accordance with policy CE-S2, native woodland, historic environment and quiet enjoyment of its special qualities. Large scale mineral extraction will be regarded as major development and will therefore be considered against Policy GP3 (Major Development). In the past the National Park Authority has received proposals for mineral exploration which generally have involved drilling. Such proposals will need to be assessed against the General Policies in Section 4 and Policy CE-S8 below.
- 5.184. In accordance with Government Policy, the National Park Authority has defined Minerals Safeguarding Areas which are set out on the Proposals Maps. Minerals Safeguarding Areas, are known locations of specific minerals resources of local and national importance, and are identified to ensure that they are not needlessly sterilised by non-mineral development, whilst not creating a presumption that resources defined will be worked. However, there is no presumption that applications to extract the mineral resources defined in Minerals Safeguarding Areas will be granted permission. Neither does a Minerals Safeguarding Area automatically preclude other forms of development. What it does, is draw attention to the presence of important mineral resources and make sure that they are adequately and effectively considered in land-use planning decisions. Policy CE-S8 will be applied in all land use and spatial planning decisions where an application for non-mineral development is proposed within defined Minerals Safeguarding Areas (see Map 5.5).

CE-S8 SMALL SCALE WORKING OR RE-WORKING FOR BUILDING AND ROOFING STONE

1. Proposals for small scale quarries or the reworking of existing small quarries to provide building or roofing stone, including for the repair of heritage assets, will be permitted where it can be clearly demonstrated that they will contribute to meeting National Park purposes and where:
 - a) there is a demonstrable need within the National Park and any minerals won will be for the sole use of the locality within the National Park;
 - b) proposals would help to provide local employment and reduce 'stone' miles;
 - c) there is suitable access and it is of a scale and design appropriate for its location in the National Park;
 - d) it would not adversely affect the landscape character, wildlife, cultural heritage, geodiversity, special qualities, tranquillity, health or amenity of the National Park;
 - e) there are no suitable sources of previously used materials that are reasonably available;
 - f) the local building material cannot be sourced sustainably from elsewhere, including from outside the National Park, and the loss of supply would result in the devaluing of the built fabric of the National Park;
 - g) permitted operations do not have unacceptable adverse impacts on the natural and historic environment or human health, including from noise, dust, visual intrusion, traffic, tip and quarry-slope stability, differential settlement of quarry backfill, mining subsidence, increased flood risk, impacts on the flow and quantity of surface and groundwater and migration of contamination from the site; and take into account any cumulative effects of multiple impacts of individual sites;
 - h) recognise that some noisy short-term activities, which may otherwise be regarded as unacceptable, are unavoidable to facilitate minerals extraction. But ensure that any unavoidable noise, dust and particle emissions and any blasting vibrations are controlled, mitigated or removed at source, and establish appropriate noise limits for extraction in proximity to noise sensitive properties;
 - i) any waste materials from extraction will be re-used or recycled. The details of which must be included with the planning application; and
 - j) a scheme for restoration and after-use of the site carried out to high environmental standards, through the application of appropriate conditions where necessary, based upon conservation and enhancement of geodiversity and biodiversity, the historic environment and quiet enjoyment, will form an integral part of the proposal and will be sought at the earliest opportunity.
2. Conditions may be applied to limit the annual extraction rate.
3. Development which would compromise the future extraction of important building stone at existing or former quarries will not be permitted.
4. Planning permission will be granted, subject to this policy and other policies within this Plan, for non-mineral development within Minerals Safeguarding Areas where:
 - a) the mineral can be extracted satisfactorily prior to the development taking place; or
 - b) the development is of a temporary nature, can be completed and the site restored to a condition that does not inhibit extraction within the timescale that the mineral is likely to be needed; or
 - c) there is an overriding need for the development.

Map 5.5 Minerals Safeguarding Areas



CE-S9 MAJOR MINERAL EXTRACTION

1. In accordance with national policy, proposals for large scale mineral extraction will not be permitted in the National Park unless in exceptional circumstances. Such proposals will be considered against the major development tests set out in policy GP3: Major Development, and should be demonstrated to be in the public interest before being allowed to proceed.
2. Where planning permission is granted for major mineral development, the development and all restoration should be carried out to high environmental standards, be in character with the local landscape and its natural features, and be subject to the following criteria:
 - a) recognise that some noisy short-term activities, which may otherwise be regarded as unacceptable, are unavoidable to facilitate minerals extraction. But ensure that any unavoidable noise, dust and particle emissions and any blasting vibrations are controlled, mitigated or removed at source, and establish appropriate noise limits for extraction in proximity to noise sensitive properties;
 - b) any waste materials from extraction will be re-used or recycled. The details of which must be included with the planning application; and
 - c) a scheme for restoration and after-use of the site carried out to high environmental standards, through the application of appropriate conditions where necessary, based upon conservation and enhancement of geodiversity and biodiversity, the historic environment and quiet enjoyment. This will form an integral part of the proposal and will be sought at the earliest opportunity.

These matters will be subject to a planning obligation.

INTERIM DEVELOPMENT ORDERS

CONTEXT

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

CE-D5 INTERIM DEVELOPMENT ORDER PERMISSIONS

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

6. RESPONDING TO CLIMATE CHANGE AND MANAGING RESOURCES

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

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

Objective 6: *To conserve and enhance Exmoor's natural resources and to improve air and water quality, conserve water resources, ensure soils are in good condition, maximise carbon storage, and minimise pollution.*

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

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

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

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

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

CLIMATE CHANGE MITIGATION AND ADAPTATION

PURPOSE OF POLICY

6.1. This policy explains the response to climate change, both in terms of mitigating the impacts of climate change through reducing greenhouse gas emissions, and building resilience by adapting to changes in climate that are already happening.

CONTEXT

6.2. Climate change is likely to be one of the most significant challenges facing Exmoor in the future. It is expected to impact on all aspects of the National Park – its natural beauty, wildlife and cultural heritage, the special qualities that people visit to enjoy and understand, and on local communities and economic activity. The UK Climate Projections 09¹⁶⁶, predict significant changes to Exmoor's climate across a range of different greenhouse gas emissions scenarios. In all cases, a rise in temperature is seen to be a highly probable outcome, with the main doubt being around by how much temperatures will rise. The main consequences of this change in climate are likely to be hotter, drier summers, and warmer, wetter winters that are characterised by periods of long duration rainfall. In contrast, frequent and short duration, high-intensity rainfall linked with longer drier summers is predicted. There is also likely to be a rise in sea level and increased storminess at the coast¹⁶⁷. These scenarios could potentially cause increased flooding from fluvial, surface water, coastal and tidal flooding. Although the exact nature of these changes on Exmoor is not known, the impacts on way of life are likely to be significant. Exmoor's communities therefore need to plan to mitigate and adapt to climate change, facing up to the threats it poses and taking advantage of any opportunities presented.

6.3. The Government has set statutory targets to reduce carbon dioxide emissions by 80% by 2050, with at least a 34% reduction by 2020¹⁶⁸. The main sources of emissions of greenhouse gases

¹⁶⁶ Adapting to Climate Change. UK Climate Projections 09, Defra

¹⁶⁷ Strategic Flood Risk Assessment Level 1 Report 2009 Prepared by Scott Wilson Ltd for West Somerset Council and Exmoor National Park Authority

¹⁶⁸ Climate Change Act 2008

from Exmoor are land management (including agricultural activity, land use change and forestry), energy and transport. Energy use accounts for 18% of Exmoor’s carbon footprint, principally comprising carbon dioxide emissions from the burning of fossil fuels from the domestic and commercial sectors. Transport makes up about 17% of Exmoor’s carbon footprint, arising from carbon dioxide emissions from vehicle movements within the National Park¹⁶⁹.

NATIONAL POLICY

- 6.4. National policy recognises the key role that planning plays in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. National policy advocates the adoption of proactive strategies to mitigate and adapt to climate change¹⁷⁰, taking full account of flood risk, coastal change and water supply and demand considerations.
- 6.5. The National Parks Circular¹⁷¹ highlights that National Park Authorities should promote energy efficiency and lead the way in adapting to and mitigating climate change, alongside a renewed focus on achieving National Park purposes. The National Park Authorities’ role as exemplars of sustainability is given particular emphasis in terms of promoting the generation of renewable energy appropriate to the national value of the landscape.
- 6.6. These aspirations are reflected in the Vision for Exmoor National Park, which includes a commitment to work towards becoming a carbon neutral National Park. The Exmoor Carbon Neutral Programme sets out a range of actions needed to reduce emissions including an ambitious energy efficiency programme, the deployment of renewable energy and heat technologies, sustainable transport measures, changes to land use and management, and increased carbon storage in peat and woodland.

CLIMATE CHANGE MITIGATION

- 6.7. The Local Plan can only influence the spatial planning aspects of climate change mitigation and adaptation. These are set out below. As climate change is such a cross-cutting issue, many of the policies in this Plan will be important to meeting the challenges of both reducing greenhouse gases, and adapting to changes in climate. In particular, policies on increasing the efficiency of existing and new build development through retrofitting, design and sustainable construction will be important (policy CE-S7); encouraging more sustainable modes of travel and reducing the need to travel (policy AC-S1); supporting small scale renewable energy schemes that are appropriate in the National Park context (policies CC-S3, CC-D4, CC-D5); reducing flood risk and managing coastal change (policies CC-D1, CC-S2); enabling wildlife and heritage assets to adapt to a changing climate (policies CE-S2, CE-S4, CE-D3); and managing waste including proposals for anaerobic digestion (policy CC-S4 Waste).
- 6.8. Since energy use accounts for 18% of Exmoor’s carbon footprint, minimising energy use and increasing energy efficiency are effective ways to reduce carbon emissions. Energy consumption can be significantly reduced through the location of development, site layout and building design, the type of materials used, and the prudent use of existing and new resources, as set out in policy CC-S7 Design and Sustainable Construction Principles. Once the demand for energy has been minimized, the incorporation of low carbon or renewable energy technologies within existing properties or new build development will also help to reduce the National Park’s carbon footprint. Small-scale renewable energy schemes that are carefully sited and designed can also have a part to play. Policy CC-S3 provides more detail on renewable energy.
- 6.9. All development, including replacement and enhancement schemes, will need to demonstrate how it has had regard to the energy hierarchy by:
 - a) reducing the need for energy;
 - b) using energy more efficiently; and
 - c) using low carbon and renewable energy.

¹⁶⁹ Exmoor National Park Carbon Neutral Programme Consultation 2010

¹⁷⁰ In line with the objectives and provisions of the Climate Change Act 2008

¹⁷¹ English National Parks and the Broads: UK Government Vision and Circular 2010, Defra

- 6.10. As climate change could lead to increased pressures on water resources, the conservation and prudent use of water resources will also be important in future. Reducing the demand for water, and improving the efficiency with which it is used through, for example, rainwater and greywater harvesting and water conservation technologies can also be encouraged during refurbishment of existing properties and through high standards of sustainable design and construction with new build development as set out in policy CC-D3.
- 6.11. As transport accounts for just under a fifth (17%) of Exmoor's carbon footprint, primarily arising from carbon dioxide emissions from vehicle movements within the National Park, reducing the need to travel and encouraging more sustainable modes of transport will be important. This can be done by supporting the continued vitality of communities and settlements with jobs, services, shopping, and leisure facilities, and encouraging residents and visitors alike to use more sustainable modes of transport, as set out in policy GP4 Spatial Strategy and transport policies (Section 10 – policy AC-S1).
- 6.12. Other components of the National Park's carbon footprint arise from agricultural activity, land use change and forestry. Changes to land use and land management and increased carbon storage in peat and woodland provide important opportunities for reducing greenhouse gas emissions and are highlighted in the Exmoor National Park Partnership Plan. Whilst these measures do not directly fall within the planning system, associated development (or change of use) may be required.

CLIMATE CHANGE ADAPTATION

- 6.13. The Exmoor Climate Change Adaptation Study¹⁷² sets out a range of responses to climate change, including managing flood risk and coastal change, ensuring existing and new buildings are well adapted, helping wildlife and habitats to be more resilient, and managing changes to the landscape and historic environment resulting from a changing climate or necessary mitigation measures.
- 6.14. The UK Climate Projections indicate that changes in the duration and intensity of rainfall, sea level rise and increased storminess at the coast could increase the risk of flooding on Exmoor. Policy CC-S2 directs development away from areas at risk of flooding and encourages land management that reduces flood risk by increasing infiltration and flood storage, slowing down the passage of water into rivers, avoiding soil compaction and erosion. High intensity rainfall could also exacerbate erosion of footpaths and bridleways. It also recognizes the need to adapt to coastal changes which could have important implications for some of Exmoor's communities. Further detail is set out in Policies CC-D1 (flood risk), CC-S2 (responding to coastal change), and RT-D12 (Access Land and Rights of Way).
- 6.15. Climate change will impact on Exmoor's landscapes, wildlife and habitats, although the exact impacts are difficult to predict. Some landscape features, characteristics, species and habitat types may benefit from the changes, whilst others could decline or be lost as a result. This policy therefore supports measures that will enable Exmoor's landscapes, wildlife and habitats to adapt to the changes that do occur and to build future resilience of ecosystems through for example expanding and connecting habitats and supporting networks of Green Infrastructure. Further detail is set out in Policies CE-S1 (Landscape Character), CE-S2 (Biodiversity) and CE-S3 (Green Infrastructure).
- 6.16. Many of Exmoor's heritage assets are also vulnerable to climate change, including direct losses from sea level rise or coastal change, or impacts resulting from necessary alterations to adapt to flood risk, improve energy efficiency and so on. Whilst these changes may be required to ensure the continued preservation of the building or site, it is important to ensure that they do not cause inappropriate or damaging alterations. Where a heritage asset is likely to be lost, the National Park Authority will seek to ensure that it is preserved through record. Further details are set out in policy CE-D3.

¹⁷² Preparing for Climate Change. ENPA, Sept 2011

CC-S1 CLIMATE CHANGE MITIGATION AND ADAPTATION

1. Climate change mitigation measures will be supported by:
 - a) Promoting the energy hierarchy through first reducing the need for energy then using energy efficiently, and using low carbon and renewable energy including through sustainable design and construction (GP1 and CC-S7).
 - b) Small scale renewable energy technologies where these are of a scale and design appropriate to the locality, do not adversely affect wildlife and contribute towards meeting domestic, community or business energy needs within the National Park (CC-S3).
 - c) Reducing the demand for water including through water conservation measures, reducing leakage, and supplying water efficiently (GP1, CE-S7, CC-D3).
 - d) Reducing the need to travel and encouraging sustainable transport modes (GP4, SE-S1, AC-S1).
 - e) Measures that support carbon sequestration and storage.
2. Proposals to adapt to the consequences of climate change will be supported by:
 - a) Avoiding development in areas at risk of flooding, and improving the resilience of essential services and infrastructure to cope with changes in climate (CC-D1).
 - b) Promoting land management which reduces the risk of flooding (CC-D1).
 - c) Adapting to coastal change (CC-S2).
 - d) Enabling wildlife and habitats to adapt to climate change including through enhancement of green infrastructure networks (CE-S3) and seeking opportunities to strengthen landscape character (CE-S1, CE-S2).
 - e) Adaptations to heritage assets that safeguard the asset but do not cause damaging alterations (CE-D3).
3. Measures to mitigate the causes of climate change and adapt to the consequences of climate change must be compatible with conserving the natural beauty, wildlife and cultural heritage of the National Park, and promoting enjoyment and understanding of its special qualities.

FLOOD RISK

PURPOSE OF POLICY

6.17. Policy CC-D1 sets out the National Park's approach to managing flood risk from all sources, and applies a sequential, risk-based approach to the location of development to avoid where possible, flood risk, taking account of the impacts of climate change.

CONTEXT

6.18. A large part of central Exmoor forms the upper part of the Exe catchment, is drained by the River Exe itself and its main tributary, the Barle. The west side of the National Park is drained by the rivers Yeo, Mole and Bray into the river Taw. The northern side of the National Park is drained by shorter rivers and streams running north into the Bristol Channel including the UMBER, Heddon and West and East Lyn in the west and the Hawkcombe Stream, Horner, Aller, Aville and Washford River in the east. Many of the watercourses on Exmoor flow through steep confined valleys which respond rapidly to rainfall.

6.19. The management of water flow is one of the key aspects of catchment management as concentrated periods of high rainfall can lead to flash flood events. Rapid run-off is thought to have been exacerbated by land drainage schemes on the moors and high ground and by compacted soils which are unable to absorb high intensity rainfall. Different approaches to reduce flood risk through good rural land management are also being tested which could benefit properties in Bossington, Allerford, West Luccombe and Horner through changes in rural land management in the catchment slowing down the passage of water and reducing rapid run off.¹⁷³ Some of these land management techniques include controlling headwater drainage, creating new woodlands and retaining water on lowland flood meadows.

¹⁷³ <http://archive.defra.gov.uk/environment/flooding/documents/manage/multi-objective-fm-scheme-factsheet1.pdf>

- 6.20. Flood risk on Exmoor has been assessed through the Strategic Flood Risk Assessment (SFRA), taking into account tidal and fluvial flood risk and the implications of climate change. Flood Zones 3a (high risk) and 3b (functional floodplain) have been defined within the principal local service centres of Dulverton, Porlock and Lynton and Lynmouth. Porlock is also highlighted as the settlement most affected by tidal/coastal flooding. For areas outside these settlements the precautionary approach has been adopted whereby the whole of Flood Zone 3 is considered to constitute the functional floodplain. Areas not lying within Flood Zone 2 or 3a/b are classified as Flood Zone 1 (lowest risk).
- 6.21. The NPPF advocates that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk or, where development is necessary, making it safe without increasing flood risk elsewhere. Impacts from coastal change should also be avoided (policies CC-D2 and CC-S2).

FLOOD ZONES AND THE SEQUENTIAL TEST

- 6.22. Flood zones have been developed by the Environment Agency as set out in Table 6.1 below with the risk of flooding increasing as you move down the table.

Table 6.1

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

- 6.23. National policy sets out a sequential test for assessing the flood risk of proposed development¹⁷⁴. The Sequential Test is a simple decision-making tool designed to ensure that sites at little or no risk of flooding are developed in preference to areas at higher risk. Development should avoid areas of flood risk, and the presumption is that all development should be located within Flood Zone 1 (areas with the least risk of flooding). Where this is not possible, then sites within Flood Zone 2 can be considered (areas of low to medium risk). Only where there are no reasonably available sites in Flood Zones 1 or 2 should the suitability of sites in Flood Zone 3 (highest risk) be considered, taking into account the flood risk vulnerability of the type of development proposed¹⁷⁵. If, following application of the Sequential Test, it is not possible for the development to be located in zones of lower probability of flooding, the Exception Test can be applied to allow necessary development to occur whilst managing flood risk. For the Exception Test to be passed it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk. In addition, a site-specific Flood Risk Assessment (FRA) must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall¹⁷⁶.
- 6.24. A site-specific FRA will be required for proposed development (except minor development) within Flood Zones 2 or 3, and for any applications within Flood Zone 1 over 1 hectare or in an area which has critical drainage problems¹⁷⁷. The Environment Agency¹⁷⁸ also advises that FRAs should be undertaken if the development site is located in an area known to have critical flooding problems from any flood source; the development is located within 20m of any watercourse regardless of Flood Zone classification; or liaison with the National Park Authority identifies the requirement for a FRA. Flood risk on Exmoor has been assessed through the

¹⁷⁴ Para 100 NPPF 2012 DCLG

¹⁷⁵ Technical Guidance to the NPPF, 2012, DCLG Table 2 provides guidance on the vulnerability of different types of development

¹⁷⁶ Para 102 NPPF 2012 DCLG

¹⁷⁷ Para 103 NPPF 2012

¹⁷⁸ <http://www.environment-agency.gov.uk/research/planning/82584.aspx>

SFRA¹⁷⁹, including flood risk zones which are shown on the Proposals Map, and other potential flood sources, as well as records of historic flood events. Further advice on undertaking site-specific FRAs is available from the Environment Agency website.

- 6.25. The Environment Agency publishes maps of flood risk on its website, and these should be referred to along with the SFRA as the most up to date source of information on flood risk. These maps are kept up to date, and will be used in the consideration of this policy.
- 6.26. Development should not increase flood risk elsewhere, and surface water run-off from new development should be minimized through careful location, layout and design including the use of sustainable drainage systems (SuDs) such as permeable materials, rainwater harvesting, filter strips and swales, soakaways, or ponds. The surface water drainage arrangements for any development site should be such that the volumes and peak flow rates of surface water leaving a developed site are no greater than rates prior to the proposed development, unless specific off-site arrangements are made and result in the same net effect. Applicants should consult the Environment Agency, the relevant Sustainable Drainage Systems Approving Body¹⁸⁰ and the National Park Authority when considering the design of sustainable drainage systems.
- 6.27. If, having applied the sequential approach and exception tests, development proceeds in an area of flood risk, residual risks should be managed including through flood resilience or resistance measures, (although these should not be used to justify development in inappropriate locations). Development design must be appropriate to the degree of flood risk identified, for example flood-resilient construction may be required to reduce the consequences of flooding and facilitate recovery from the effects of flooding sooner than conventional buildings. This may be achieved through designing buildings so that water can flow through lower levels, the use of water-resistant materials for floors, walls and fixtures and the siting of electrical controls, cables and appliances at a higher than normal level. In some circumstances, flood-resistant construction may be required, which can prevent entry of water or minimise the amount of water that may enter a building where there is flooding outside. Safe access and escape routes accounting for climate change must also be provided and agreed with the Environment Agency for developments within Flood Zones 2 and 3.
- 6.28. Where permission is granted, developer contributions towards providing the necessary flood defences will be sought.

MANAGING FLOOD RISK ON EXMOOR

- 6.29. A large part of central Exmoor forms the upper part of the Exe catchment, is drained by the River Exe itself and its main tributary, the Barle. The west side of the National Park is drained by the rivers Yeo, Mole and Bray into the river Taw. The northern side of the National Park is drained by shorter rivers and streams running north into the Bristol Channel including the UMBER, Heddon and West and East Lyn in the west and the Hawkcombe Stream, Horner, Aller, Aville and Washford River in the east. Many of the watercourses on Exmoor flow through steep confined valleys which respond rapidly to rainfall.
- 6.30. The management of water flow is one of the key aspects of catchment management as concentrated periods of high rainfall can lead to flash flood events. Rapid run-off is thought to have been exacerbated by land drainage schemes on the moors and high ground and by compacted soils which are unable to absorb high intensity rainfall. Different approaches to reduce flood risk through good rural land management are also being tested which could benefit properties in Bossington, Allerford, West Luccombe and Horner through changes in rural land management in the catchment slowing down the passage of water and reducing rapid run off.¹⁸¹ Some of these land management techniques include controlling headwater drainage, creating new woodlands and retaining water on lowland flood meadows.
- 6.31. Flood risk on Exmoor has been assessed through the SFRA, taking into account tidal and fluvial flood risk and the implications of climate change. Flood Zones 3a (high risk) and 3b (functional floodplain) have been defined within the larger settlements of Dulverton, Porlock and Lynton

¹⁷⁹ Strategic Flood Risk Assessment Level 1 Report, Scott Wilson Associates for West Somerset Council & Exmoor National Park Authority, March 2009

¹⁸⁰ Devon and Somerset County Councils are designated as the relevant Sustainable Drainage Systems Approving Bodies under the Floods and Water Management Act 2010 and must approve drainage systems in new developments and re-developments before construction begins

and Lynmouth. Porlock is also highlighted as the settlement most affected by tidal/coastal flooding. For areas outside these settlements the precautionary approach has been adopted whereby the whole of Flood Zone 3 is considered to constitute the functional floodplain. Areas not lying within Flood Zone 2 or 3a/b are classified as Flood Zone 1 (lowest risk).

- 6.32. Some existing infrastructure is at risk of flooding. Transport links within West Somerset, such as the A39 in the vicinity of Williton, Ellicombe and Dunster Marsh, and transport routes within Exmoor National Park around Dulverton are affected by fluvial flooding (see AC-S2 Transport Infrastructure and Section 10). The Police Station and Fire Station are also at risk from fluvial flooding in Dulverton. Surface water flooding is typically generated by short duration, intense rainfall events where precipitation is unable to infiltrate the ground or enter drainage systems. Subsequently, water may become transferred overland causing localised flooding. Other risks of flooding arise from reservoirs as a result of dam or bank failure and the predominant flood risk direction is shown on the Proposals Map.
- 6.33. Land used for holiday or short-let caravans and camping, and permanently occupied caravan and mobile home sites give rise to special problems in relation to flooding. Caravan or mobile home sites intended for permanent occupation are regarded to be at higher risk (classified as 'highly vulnerable')¹⁸². The instability of such structures places their occupants at special risk and they are likely to be occupied throughout the year including the winter months when flood risk is likely to be higher. Sites intended for temporary occupation are considered to be at lower risk (classified as 'more vulnerable') because they are usually occupied during the summer when flood events are less likely to occur, although they may be located for amenity and recreational reasons on coastal or riverside sites with a high residual risk of flooding. Consequently, permanently occupied sites ('highly vulnerable' development) will not be permitted in Zones 3a and 3b, and temporarily occupied sites ('more vulnerable' development) will not be permitted in Zone 3b (functional floodplain).
- 6.34. Flood watch areas¹⁸³ have been established in several parts of the National Park, where the Environment Agency provides a flood warning system. Emergency responses to extreme flood events are co-ordinated via the Somerset and Devon Flood Warning Response Plans bringing together the emergency services, local authorities and other partners.
- 6.35. The presence of formal raised manmade flood defences within the National Park is limited. Long term planning for flood risk within the National Park is set out in Catchment Flood Management Plans (CFMP) to cover fluvial and tidal flood risk, and Shoreline Management Plans (SMP) dealing with coastal flood risk. The National Park is covered by three CFMPs: North Devon, Exe and West Somerset. These provide a catchment overview of the main sources of flood risk and how these can be managed in a sustainable way for the next 50 to 100 years. The policy options range from no active intervention, to taking further action to reduce flood risk. The policy options for the catchment units within the National Park are summarized in the SFRA and will be taken into account in decision-making relating to Policy CC-D1.
- 6.36. The draft Shoreline Management Plan (SMP2) provides information regarding the risks of coastal change and the preferred strategy when considering future development and land use change on the coast. The Exmoor coastline is largely undeveloped and dominated by steep cliffs interspersed by steep sided valleys and Porlock Vale. The SMP2 approach to coastal change is to continue to allow it to evolve naturally to conserve important landscape characteristics; however it is proposed that the sea defences at Lynmouth will be maintained. At Porlock Weir it is proposed that there is no active intervention, and the policy approach is set out in CC-S2. Natural coastal evolution will be allowed to continue along the Porlock shingle ridge area as the flood risk in this area is fluvial rather than tidal.

¹⁸² Technical Guidance to the NPPF, 2012, dCLG Table 2 Flood Risk Vulnerability classification

¹⁸³ SFRA Figures 7 A & B

CC-D1 FLOOD RISK

1. Development proposals will be permitted where they:
 - a) Are consistent with the sequential test and applicants demonstrate that sites at little or no risk of flooding are developed in preference to areas at higher risk.
 - b) Do not increase the risk of flooding elsewhere.
 - c) Allow for relocation of communities, infrastructure or facilities at risk of flooding in accordance with policies CC-D2 and CC-S2.
 - d) Help to reduce the overall level of flood risk in and around the area through land management and working with natural processes, conserving the natural environment and cultural heritage.
 - e) Do not reduce the potential of land used for current or future flood management.
 - f) Are compatible with the appropriate Catchment Flood Management Plan or Shoreline Management Plan.
 - g) Use development to reduce the risk of flooding through location, layout and design and incorporate sustainable drainage systems to minimise surface water run-off and avoid pollution.
2. Where appropriate, a site-specific Flood Risk Assessment should support proposals.
3. Where, as a result of applying the sequential test, a development is approved on an exceptions basis, planning agreements or developer contributions will be sought to ensure that the development is protected from flooding to the appropriate standard throughout its lifetime. Any required additional or enhanced flood defences should not conflict with National Park purposes.

COASTAL DEVELOPMENT

PURPOSE OF THE POLICY

6.37. Exmoor has a wild, undeveloped coast, characterised by high cliffs, headlands and uninterrupted views giving a sense of tranquillity and remoteness. It can also have a level of coastal vulnerability associated with it due to the impact of coastal change. Policy CC-D2 seeks to protect the undeveloped nature of the coastline and ensure the vulnerability of any new development is minimised.

CONTEXT

6.38. The coast is important for its natural beauty, historic assets and supports a range of habitats and species. A significant proportion of the coast has a number of designations including Sites of Special Scientific Interest, Special Areas of Conservation, Heritage Coast and areas identified on the Section 3 Conservation Map. Furthermore the coast is a tourism asset; the South West Coast Path is a national trail which follows the Exmoor coast for part of its length and it makes an important contribution to the local economy.

6.39. Planning at the coast requires a strategic approach due to natural processes acting across regional and local authority boundaries. The NPA will therefore work closely with neighbouring partners to ensure a co-ordinated approach¹⁸⁴. This will include the Marine Management Organisation, as there is an overlap of jurisdiction with local planning powers extending from the land down to low water mark and marine plans from the sea to the high water mark.

COASTAL CHANGE AND THE PRECAUTIONARY APPROACH

6.40. A Shoreline Management Plan (SMP) is a long-term plan for the management of the risks associated with coastal processes. It takes into account the impacts of climate change, risks to people and the developed, historic and natural environment¹⁸⁵. They are therefore an important

¹⁸⁴ NPPF 2012 DCLG

¹⁸⁵ It sets out coastal policies over a 100 year timescale to manage tidal flooding and coastal erosion risks.

part of the evidence base for planning in coastal areas¹⁸⁶. The revised SMP for North Devon and Somerset¹⁸⁷ covers the stretch of coast from Hartland Point in Devon to Anchor Point in Somerset and includes the whole of the Exmoor coastline¹⁸⁸.

- 6.41. Coastal change refers to a physical change to the shoreline including permanent inundation, erosion and coastal accretion¹⁸⁹. The risk of coastal change including by flooding means that a precautionary approach should be taken to minimise risk to life and property. Development at the coast should therefore avoid areas known to be at risk of climate change or those areas which are likely to become an area at risk within the lifetime of the development as indicated by the SMP and other evidence. Where development is proposed in a location considered to be at risk of coastal change the applicant must be able to demonstrate that the development will be safe during its lifetime and have accounted for the impacts of flooding, climate change and sea level rise (CC-S1 Climate Change Mitigation & Adaptation).
- 6.42. Where it is identified from evidence such as the SMP that an area is likely to be affected by coastal change a Coastal Change Management Area (CCMA) will be identified. Further details on CCMA's and responding to coastal change are provided in Policy CC-S2.

CONSIDERATIONS FOR PROPOSALS

- 6.43. Coastal interests can be wide ranging and include the rich variety of environmental, historic and recreational importance of the coast. Proposals at the coast will need to be consistent with other policies in this plan which reflect coastal interests including: GP4 Spatial Strategy, CE-S1 Landscape Character, CE-S2 Biodiversity, CE-S7 Design & Sustainable Construction Principles, CE-S4 Cultural Heritage and Historic Environment, RT-S1 Recreation & Tourism, RT-D12 Access Land and Rights of Way. To protect the undeveloped nature of the Exmoor coastline, new development should be located in named settlements¹⁹⁰ unless it can be demonstrated that the proposal is essential in an undeveloped coastal location and is consistent with policies CC-D2 and CC-S2.
- 6.44. Development at the coast has the potential to be visually intrusive, for example by affecting the skyline and views along the coast including undeveloped stretches (CE-S1 Landscape Character). Proposals must demonstrate that there will be no adverse impact on the coastline and any coastal issues that may arise will need to be carefully considered including direct, indirect, cumulative, long-term and short-term impacts. Proposals must also demonstrate they are appropriate to the coastal location and that they will not affect natural coastal processes or result in coastal water pollution (CC-S5 Pollution)¹⁹¹ to the detriment of surrounding areas including those outside the National Park.
- 6.45. Furthermore the traffic impacts of new development should be carefully considered as there is a need to minimise the impact of seasonal traffic on narrow roads that lead to the coast particularly around popular destinations such as Porlock and Lynton & Lynmouth.
- 6.46. Improvements to existing sea defence works are not usually subject to planning control although Exmoor National Park would be expected to be consulted on any proposed changes. Planning permission is however required for new sea defence works. As sea defences can have a considerable effect on the coastal environment and natural beauty of the area, good design will be essential to ensure proposals conserve or enhance their surroundings visually.

¹⁸⁶ Paras 41 and 56 NPPF 2012 DCLG

¹⁸⁷ Prepared by the EA in partnership with the North Devon and Somerset Coastal Advisory Group (NDASCAG) was drafted in 2010

¹⁸⁸ <http://www.ndascag.org/> [Accessed 06.03.2012] At the time this was looked at it was noted that the document remained a draft, therefore subject to change until it has been signed off by the EA SW Regional Director on behalf of DEFRA

¹⁸⁹ NPPF 2012 DCLG

¹⁹⁰ Supported by YFE community consultation 2009-2010, Stakeholder YFE Consultation, Member/staff YFE consultation, Youth Consultation (Ilfracombe, Petroc [Barnstaple])

¹⁹¹ Para 25 NPPF 2012 DCLG refers to 'Local planning authorities should reduce risk from coastal change by avoiding inappropriate development in vulnerable areas or adding to the impacts of physical changes to the coast'

CC-D2 COASTAL DEVELOPMENT

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

RESPONDING TO COASTAL CHANGE

PURPOSE OF POLICY

6.47. Policy CC-S2 Responding to Coastal Change ensures the precautionary principle is followed regarding development at the coast to minimise risk to life or property. Coastal change is of particular concern where it is likely to adversely affect existing communities and development. Policy CC-S2 provides a mechanism for areas identified at risk and sets out the principles that need to be considered to enable a strategic approach to the adaptation and replacement (through relocation) of development likely to be affected by the physical changes of the coast¹⁹². Proposals regarding CC-S2 should also refer to CC-D2 for further details on coastal development.

NATIONAL CONTEXT

6.48. National government promotes the adoption of proactive strategies when responding to coastal change¹⁹³. Any area likely to be affected over the next 100 years by physical changes to the coast (defined primarily from evidence provided by Shoreline Management Plans (SMPs)) will be identified as a Coastal Change Management Area (CCMA). When defining the geographical extent of a CCMA, relevant bodies including the Environment Agency will be consulted. For these areas the principles of CC-S2 will be followed to:

- a) be clear as to what development will be appropriate in such areas and in what circumstances; and
- b) make provision for development and infrastructure that needs to be relocated away from CCMA¹⁹⁴

6.49. Where appropriate, a strategic plan will be developed incorporating an identified CCMA and the principles of CC-S2 to ensure an integrated approach is undertaken to manage the overall sustainability of the community likely to be affected by physical changes at the coast.

CONTEXT

COASTAL CHANGE

6.50. With the impact of climate change leading to sea-level rise and increased storminess, significant challenges lie ahead in the management of the coast. The exacerbation of coastal change by the impact of climate change has increased the coastline's vulnerability. Evidence of coastal

¹⁹² Supported by YFE Community, member/staff YFE consultation and YFE youth consultations (Ilfracombe, Petroc [Barnstaple]) for locating, adapting and designing new development to cope with effects of more extreme weather. YFE Stakeholder event supported planning for areas at risk of change and locating, adapting and designing new development to cope with the effects of more extreme weather. UK Marine Policy Statement, 2011 (HM Government) (The Stationary Office)

¹⁹³ NPPF 2012 DCLG

¹⁹⁴ NPPF 2012 DCLG

change within Exmoor National Park includes the 1996 breach of the shingle ridge at Porlock Bay which flooded the low lying marsh behind. Rapid evolution of the beach and the development of salt marsh followed¹⁹⁵.

- 6.51. Although the impacts of climate change cannot be fully predicted, planning based on the best available evidence can help identify those areas most at risk and assist in decision making on any appropriate action (CC-S1 Climate Change Mitigation & Adaptation). Effective policies are required to prepare for and adjust to the impacts of climate change on the coast. Risk will be appraised using SMPs and other up-to-date material information on coastal change as it becomes available.

SHORELINE MANAGEMENT PLAN

- 6.52. A Shoreline Management Plan (SMP) is a long-term plan for the management of the risks associated with coastal processes. It takes into account the impacts of climate change, risks to people and the developed, historic and natural environment¹⁹⁶. They are therefore an important part of the evidence base for planning in coastal areas¹⁹⁷.
- 6.53. The SMP for North Devon and Somerset¹⁹⁸ includes changes to the coastal policy unit at Porlock Weir from a 'Hold the Line' policy to 'No Active Intervention' commencing from the adoption of the SMP. This implies that assets at Porlock Weir including residential properties, listed buildings and local infrastructure would become at risk of flooding and erosion. To 'hold the line' at Porlock Weir would, in the short term, require existing defences to be replaced with much larger structures to withstand the increased exposure to wave action. This would make it technically and economically difficult to sustain coastal defences here. It is noted in the SMP that it is unlikely that future sea defence provision at Porlock Weir would attract public funds, although there is flexibility for the existing localised defences to be maintained or replaced if alternative funding is made available. However it also questions the sustainability of defences at Porlock Weir because their retention could potentially impact on the wider coastline of Porlock Bay in the long term. Continued defence would only be acceptable if there was limited impact on sediment transport along the coastline. The impact of coastal change at Porlock Weir was further studied by the Somerset Coastal Change Pathfinder project¹⁹⁹, this demonstrated through a visual mapping exercise the possible significant consequences of coastal change at Porlock Weir²⁰⁰.
- 6.54. CC-S2 provides the mechanism for areas at risk, such as potential properties at Porlock Weir, to have the opportunity to respond to climate change. It is envisaged that Porlock Weir will be identified as a CCMA and a strategy for Porlock Weir and surrounding area will be produced. Any proposals for adaptation and relocation at Porlock Weir should accord with this strategy.
- 6.55. The SMP continues a 'hold the line' policy at Lynmouth, implying that the defences will be maintained and eventually replaced with larger structures to continue to provide protection to Lynmouth. Impacts could include the loss of beach width due to the combination of sea level rise and retention of coastal defence, the potential loss of terrestrial habitat from the Exmoor Coastal Heaths SSSI and Exmoor Heath and Coast SAC. Further impacts could include the loss of or damage to a number of non-designated archaeological features, scheduled monuments and parts of the South West Coast Path.

CONSIDERATIONS FOR PROPOSALS

- 6.56. Policy CC-S2 will be applied only to those communities where there is accepted evidence that they are at risk of coastal change. Any proposals for replacement of development through relocation will need to demonstrate that the overall proposal for both new development created and measures for the management of that which is to be lost are consistent with the principles in Policy CC-S2.

¹⁹⁵ <http://www.english-nature.org.uk> [Accessed 06.03.2012] An evaluation of the breach processes at Porlock shingle ridge was undertaken between 1998 and 2004 by the Environment Agency <http://www.environment-agency.gov.uk/> [Accessed 06.03.2012]

¹⁹⁶ It sets out coastal policies over a 100 year timescale to manage tidal flooding and coastal erosion risks

¹⁹⁷ Paras 41 and 56 NPPF 2012 DCLG

¹⁹⁸ SMP 2010

¹⁹⁹ DEFRA funded from 2009-2011. The project had the aim of assisting those coastal communities most at risk from sea level rise to help them adapt to projected changes at the coast. Project outputs included the development of a scenario for Porlock Weir following a major storm event

²⁰⁰ http://www.somersetcoastalchange.org.uk/about_the_project/porlock_weir [Accessed 06.03.2012]

- 6.57. The relocation of development at risk to ‘safer’ areas could be achieved in a number of different ways, including the relocation further inland or to neighbouring settlements (GP4 Spatial Strategy). Time limited conditions may also be used to enable flexibility in replacement through relocation. The NPA will work with partners to consider the full range of options based on sound evidence for a community ‘at risk’ to find the most appropriate solution for it, which will include the impact on the natural, cultural and built environment.
- 6.58. Proposals to relocate development being displaced as a result of coastal change should be able to demonstrate the reasons for the choice of location for any relocated development including local socio-economic links between the relocated development and the community from which the development was displaced.
- 6.59. Future arrangements should be made for the buildings to be replaced to ensure they are rendered safe, either through clearance or ‘managed’ which may include a temporary and alternative use of the site. Where permission is granted, a planning obligation will be secured to ensure the satisfactory management of the development which is to be lost. The coordination of the development which is to be lost and the new replacement development may be managed through a legal agreement. Proposals for the relocation of an existing dwelling should apply the same principles as those in HC-D15 Replacement Dwellings in respect of floorspace and reflect the scale of the original building it is replacing. Development should also be of a character and quality commensurate with its location in a National Park and should be well integrated within its locality, ensuring the place will function well²⁰¹. Proposals for relocation may provide an opportunity for the enhancement of the National Park; this should be consistent with policy GP6: Enhancing the National Park.

CC-S2 RESPONDING TO COASTAL CHANGE

- 1. Where the adaptation of development or its replacement through relocation is proposed in response to coastal change, it must be demonstrated that the existing development is in an area likely to be significantly affected by physical changes at the coast, such development includes infrastructure at the coast (CC-S1 Climate Change Mitigation & Adaptation, AC-S1 Sustainable Transport). Proposals for adaptation of existing development should be consistent with other policies in this Plan. The replacement of development through relocation must be consistent with the following principles:**
 - a) it is important to the well-being of the coastal community affected;**
 - b) it is not within an area likely to be affected by physical changes to the coast;**
 - c) it is well related to current buildings and infrastructure including in its siting, scale, height and design (CE-S7);**
 - d) replacement development is of the same size and use as the original asset at risk unless an opportunity for significant visual enhancement can be demonstrated in accordance with GP6. In the case of dwellings, they accord with the maximum floorspace provision in HC-D15;**
 - e) the site of the original development at risk it replaces is either cleared or managed to be rendered safe for the local community, environment and consistent with National Park purposes; and**
 - f) the overall proposal considering both new development and management of that which is to be lost will result in no unacceptable impact on the landscape, biodiversity, built environment, townscape or local communities.**
- 2. Porlock Weir**
A strategy for Porlock Weir and surrounding area will be produced in line with the principles of CC-S2 Responding to Coastal Change and any proposals for adaptation and relocation at Porlock Weir will be required to be achieved in accordance with this strategy.

²⁰¹ NPPF 2012 DCLG, apply integrated coastal zone management p.25, the character of the coast including its designations are not compromised p.25 maintain character of the coast p.26

WATER CONSERVATION

CONTEXT

- 6.60. The National Park is an important source of water for communities both within and outside the National Park. The catchments on Exmoor supply drinking water to over half a million people including in Tiverton, Exeter and Taunton. The implications of growth in settlements outside the National Park for water conservation on Exmoor will need to be assessed as part of adjacent Authorities' Local Plan appraisals. Its popularity as a tourist destination, along with many other parts of the South West, also increases demand for water supplies, particularly during the summer months. Water resources are important for the local economy and businesses, particularly agriculture. Careful management and protection of these water catchments is important to ensure that their ability to provide ecosystem services including capturing and storing rainfall, managing flood risk, water re-cycling, the supply of clean, fresh water, and support for wildlife habitats and species are not compromised. Monitoring programmes are required by the Water Framework Directive to establish an overview of the water status in each river basin district. Water Framework Directive assessments by the Environment Agency have generally found rivers and streams on Exmoor to be in 'good' ecological status.
- 6.61. Water is supplied primarily from Roadford and Wimbleball reservoirs, other smaller reservoirs, a number of rivers and their tributaries and numerous groundwater resources and are administered by South West Water and Wessex Water. In some cases, in more remote areas there may be private water supplied from sources such as springs, wells and boreholes where access to public water supply is too expensive to connect due to distance. Wessex Water covers parts of the eastern side of the National Park. Groundwater is an important component of water resource availability for Wessex Water, although supplies are also drawn from Wimbleball reservoir and a number of rivers and tributaries. Assessment²⁰² of water requirements and likely supplies in this part of the Park over the period of the Plan (including climate change implications) has identified that there is sufficient water to meet demands, provided action is taken to improve water conservation (along with other actions for the water company including reducing leakage). This area is considered to be in low risk of water stress²⁰³.
- 6.62. South West Water covers parts of the western side of the National Park. The key resources that are available include Roadford and Wimbleball reservoirs, the River Exe and its tributary the Barle, which are used to recharge Wimbleball reservoir, and a number of groundwater resources. Assessment²⁰⁴ of water requirements and likely supplies in this part of the Park over the period of the Plan has identified that sufficient water can be provided to meet demands, provided measures to improve demand management and leakage control are undertaken and there is further investment in water supply infrastructure (outside the National Park), although rising population numbers in large settlements outside the National Park are likely to put increasing pressure on water resources. This area is considered to be in moderate risk of water stress²⁰⁵. There are no plans to invest in additional water supply infrastructure within the National Park during the Plan period.
- 6.63. As well as providing water for public drinking supplies, water is essential to Exmoor's landscapes and wildlife, and it is vital to the livelihoods of those who live and work here particularly for agriculture and other non-domestic uses. Water is highly relevant to conservation of biodiversity²⁰⁶ both in terms of the quality and quantity of water that is available to support the survival of water dependent species and wetland habitats. A number of rivers and wetland sites are designated on Exmoor and are dependent upon there being appropriate water quality to support the habitats and species for which they were designated (see policy CE-S2 Biodiversity). Water supplies are also required to provide a sufficient base flow for rivers to maintain fish stocks and other aquatic species, and to dilute any pollution and sewage (CC-S5 Pollution).
- 6.64. The Government is committed to protecting water ecosystems to achieve good ecological status through a river basin planning approach, under the EU Water Framework Directive (WFD). This Directive requires the protection, improvement and sustainable use of freshwater systems and

²⁰⁶ England Biodiversity Strategy, Defra 2011

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

- 6.65. Demand for water resources in the future is expected to increase with a growing population, particularly in communities outside the National Park who are serviced by water arising on Exmoor. Climate change and the associated warmer, drier, summers are likely to affect the availability of resources including reduced flows in rivers, reductions in the recharge of aquifers and a consequent lowering of groundwater levels²⁰⁷ and Water Resource Management Plans have tried to take into account the implications in the assessment of long term water availability. Increased frequency of extreme weather events may also affect both water supplies and the risk of flooding (CC-D1 Flood Risk). There may also be other effects on the water environment, such as increased water temperatures, which will also impact on aquatic species and habitats. These potential effects would be exacerbated by likely increases in the demand for water from households and industry. Additional measures for storing and conserving water resources, for example, through rainwater harvesting or small scale farm water storage including reservoirs, bunds and ponds may be required in future²⁰⁸.
- 6.66. The emphasis is therefore on conserving water resources on Exmoor including maintaining river flows at periods of low rainfall, and managing water on a catchment basis. Development should not have a detrimental impact on the water environment and should incorporate measures to support water efficiency and re-use (see policy CE-S7 Design and Sustainable Construction Principles). This could include minimising demand, recycling and storing water, and retrofit where appropriate. Retrofitting on listed buildings would require listed building consent, and on traditional buildings would need to not cause harm to the historic fabric of the building.

CC-D3 WATER CONSERVATION

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

²⁰⁷ Water resources in England and Wales - current state and future pressures Environment Agency 2008

²⁰⁸ Water for Life, Defra 2011

LOW CARBON AND RENEWABLE ENERGY DEVELOPMENT

PURPOSE OF THE POLICY

6.67. Policy CC-S3 sets out the National Park Authority's overall approach to climate change mitigation and adaptation, which includes support for appropriate small scale renewable energy technologies. This policy sets out in more detail the specific approach to renewable energy within the National Park.

NATIONAL POLICY

6.68. The Government has set a UK target to deliver 15% of the UK's energy consumption from renewable sources by 2020, and also has an ambition that by 2020, 12% of heating should come from renewable sources.

6.69. The National Planning Policy Framework places the responsibility on all communities to contribute to energy generation from renewable or low carbon sources. Renewable and low carbon energy development should be encouraged, while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts. Community-led initiatives are also encouraged for renewable and low carbon energy, including developments outside such areas being taken forward through neighbourhood planning.

6.70. The Government's Vision²⁰⁹ for National Parks particularly highlights the National Park Authorities' role as exemplars of sustainability in responding to climate change, including promoting energy efficiency and the generation of renewable energy, whilst not compromising their overriding duty under the 1949 Act. It recognises that the National Parks offer important opportunities for a range of renewable energy technologies, including biomass (woodfuels), micro-hydro, anaerobic digestion (which will also reduce waste), wind and solar power installations, appropriate to the national value of the landscape.

CONTEXT

6.71. The use of energy accounts for about 18% of Exmoor's carbon footprint. The greatest demand for energy is from domestic heating, which is currently provided through a combination of oil, cylinder gas, coal, electricity, woodfuel and a small amount of mains gas. As a consequence, domestic heating also accounts for around two-thirds of emissions arising from energy use. The remaining emissions related to energy are from electricity for homes, heating for businesses, and electricity for businesses²¹⁰.

6.72. The National Park Authority has encouraged the use of renewable technologies through the Carbon Neutral Exmoor programme. In appropriate circumstances small scale renewable energy schemes utilising technologies such as solar panels, biomass (woodfuel) heating, small scale wind turbines, photovoltaic cells and combined heat and power schemes can be incorporated both into new developments and some existing buildings – this is supported in appropriate circumstances through policy CE-S7 Design and Sustainable Construction Principles.

6.73. The Renewable Energy Resource Assessment²¹¹ for Exmoor National Park identifies the potential for a range of technologies across Exmoor. This highlights in particular the opportunities from biomass due to the availability of woodfuel and other crops within the National Park. Hydropower is another potential source within the National Park, although not all water courses may be suitable and other interests will need to be taken into account. Solar heat and electricity (PV) have become more widespread (particularly following Government incentives and reductions in cost), and probably to a lesser degree, ground and air source heat pumps. The wind resource is good, however potential in Exmoor is likely to be limited by the need to site turbines in locations sympathetic to the natural beauty, wildlife and cultural heritage of the National Park. Energy from waste technologies could provide a sustainable way of managing residual municipal waste and agricultural wastes providing travel distances are minimised. Tidal stream and wave energy are developing technologies that are not currently commercially viable, but could become so over the Plan period. Proposals for renewable energy

²⁰⁹ English National Parks and the Broads: UK Government Vision and Circular DEFRA 2010

²¹⁰ Exmoor Carbon Neutral Programme Consultation, Exmoor National Park Authority, 2010

²¹¹ Renewable Energy Resource Assessment for Exmoor, 2008

technologies would need to consider the implications of flood risk and coastal change in accordance with policies CC-D1 Flood Risk and CC-S2 Responding to Coastal Change.

RENEWABLE ENERGY

- 6.74. Not all renewable energy technologies will require planning permission. However the National Park Authority encourages applicants to consider the full range of technologies available and to discuss proposals with the Local Planning Authority at an early stage. Applicants will be expected to demonstrate that they have undertaken measures to reduce the need for energy and improve energy efficiency before considering renewable energy and the type of renewable energy technology to be used, to ensure that they are consistent with the National Parks Vision and Circular that in National Parks renewable energy generation is appropriate to the national value of the landscape²¹².
- 6.75. The National Park Authority is supportive in principle of small-scale renewable energy developments which contribute towards meeting domestic, community or business energy needs within the National Park provided that there is no significant environmental harm to the area concerned or the National Park as a whole. For the purposes of this policy, ‘small-scale’ is defined as schemes of a scale that can be carried out within the capacity of the local environment and consistent with its landscape character, without causing damage to its natural beauty, cultural heritage, wildlife, or eroding enjoyment of the special qualities of an area, in accordance with statutory purposes and national policy²¹³. This will include cumulative impacts when considered in combination with any existing schemes within the National Park or affecting its setting. Where the impacts are acceptable small scale renewable energy schemes that provide community benefits or environmental enhancement will be particularly supported. Large and medium scale renewable energy projects will not be acceptable within Exmoor. Nationally significant energy infrastructure projects²¹⁴ will be determined by the Secretary of State.
- 6.76. Planning permission for renewable energy developments likely to have an adverse effect on a site with internationally or nationally recognised designations (Special Areas of Conservation, Sites of Special Scientific Interest, National Nature Reserves, Scheduled Monuments, Conservation Areas, Listed Buildings, and Registered Parks and Gardens identified on the Proposals Map) will not be granted, unless an assessment has shown that the objectives of designation of the area will not be compromised by the development, and any significant adverse effects on the qualities for which the area has been designated have been mitigated and are clearly outweighed by the environmental, social and economic benefits. Impacts on Local Wildlife Sites and other areas of nature conservation or heritage interest will also be subject to a similar assessment.
- 6.77. Proposals will need to be consistent with policies CE-S1 Landscape Character, CE-S2 Biodiversity, and CE-S4 Cultural Heritage and, where necessary, landscape sensitivity and capacity analysis, ecological or historic environment/ archaeological surveys or other investigations deemed necessary by the National Park Authority should be carried out to inform the application. Environmental Impact Assessment (EIA) will be required for certain renewable energy projects where the development falls into a category within Schedule 2(3) of the Regulations²¹⁵ and the National Park Authority adopts a ‘screening opinion’ that EIA is required.

ISSUES TO BE CONSIDERED IN PROPOSALS FOR RENEWABLE ENERGY DEVELOPMENT

- 6.78. There are many different types of renewable energy technologies, and some are more compatible to National Park purposes than others. Applicants are therefore encouraged to consider the range of technologies available at an early stage, and to discuss proposals with officers so that appropriate schemes can be supported. Proposals should clearly set out the benefits arising from the development including for example reductions in emissions, environmental enhancements, community or social benefits, and economic benefits such as job

²¹² Para 47 English National Parks and the Broads UK Government Vision and Circular 2010, “The Parks offer important opportunities for renewable energy generation which must not be overlooked, including woodfuels, and micro-hydro, anaerobic digestion (which will also reduce waste), wind and solar power installations appropriate to the national value of the landscape. The Authorities should promote energy efficiency within the Parks

²¹³ Para 14, footnote 9 NPPF 2012 DCLG

²¹⁴ Defined in the Overarching National Policy Statement for Energy Infrastructure as Onshore wind or biomass schemes generating more than 50 megawatts and offshore wind schemes over 100 megawatts

²¹⁵ The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011

creation and retention. However, care must also be taken in the detailed design of any proposal to minimise potential adverse impacts, both during construction and operation. Applications should assess the impacts of the proposed scheme along with any required infrastructure such as buildings, tracks, overhead cables or pipelines. The impacts will vary according to the type of scheme proposed, and the level of assessments and information required should be proportionate to the scale of the proposal and its likely impact. Further details are given below.

- 6.79. Planning conditions may be used to ensure that any residual impacts of approved schemes are acceptable, to require removal of approved structures if they become redundant, and restoration of the site.

LANDSCAPE AND VISUAL IMPACT

- 6.80. The landscape and visual effects of particular renewable energy developments should be assessed in accordance with policy CE-S1 Landscape Character. Potential impacts will vary on a case by case basis according to the type of development, its location and the landscape setting and sensitivity of the proposed development. Landscape sensitivity is the degree to which a particular landscape character type or area can accommodate change without unacceptable detrimental effects on character.
- 6.81. The effects of renewable energy schemes on landscape can include:
- a) direct impacts on landscape fabric (for example loss of a hedge or other feature);
 - b) impacts on landscape character, including effects on the distinct pattern of elements of the landscape such as scale, landform, vegetation patterns, historic and cultural features; and / or
 - c) impacts on the perceptual characteristics of landscape – including feelings of openness, remoteness, tranquillity, and beauty.
- 6.82. The visual impacts of renewable energy schemes will depend on where they can be seen from and who will see them. Landform is a fundamental issue for Exmoor particularly moorland landscapes which have a horizontal emphasis of ridges, plateaux, and smooth horizons. As with landscape character, the significance of visual impacts will vary according to the sensitivity of the receptor environment, and the magnitude of change, for example a scheme in a remote moorland area with open views and few visible human artefacts would be more sensitive to visually intrusive vertical elements such as wind turbines than areas with more existing activity and structures.
- 6.83. Some of these effects may be minimised through appropriate siting, design and landscaping schemes, depending on the size and type of development proposed. For example, visibility of wind turbines from valleys can be decreased if the siting of turbines avoids blades breaking the skyline from important viewpoints. The most quiet, scenic and tranquil areas should be avoided, as should any visual competition with historic features such as church towers, historic settlements, or other landmarks. Grouping any necessary structures with existing buildings, trees or landform can help visual integration, and for smaller schemes screening may be possible. The design of structures is also important, and traditional materials and form should be used where possible. The colour of wind turbines can also help to reduce visual impacts.
- 6.84. The cumulative impacts of a number of structures associated with the scheme and with other existing renewable energy schemes within the locality or visible from it should also be considered. Cumulative landscape effects and visual effects should be considered separately. The former refers to the effects of a proposal development on the landscape fabric, character and quality and so concerns the degree to which renewable energy development becomes a significant or defining characteristic of the landscape. Cumulative visual effects concern the degree to which renewable energy development becomes a feature in particular views (or sequences of views), and the effect this has upon the people experiencing those views.
- 6.85. Applicants should consider issues of landscape and visual impact and demonstrate that any impacts can be avoided, minimised or mitigated such that the proposals will not detract from the natural beauty of the National Park.

WILDLIFE

- 6.86. The impact of renewable energy schemes on the local ecology should be carefully assessed in accordance with policy CC-S2 Biodiversity and where possible, result in an overall benefit for wildlife. Care must be taken to prevent proposals from adversely affecting existing nature conservation areas or species of conservation interest. Applications in areas designated for their ecological importance (SACs, SSSIs, NNRs) must demonstrate that they will not affect the integrity or special interest of the habitats or species for which the area was designated. Any potential impacts on Local Wildlife Sites should also be considered.
- 6.87. The potential impacts from renewable energy schemes on wildlife depend on the type of technology and its location. Wind turbines may have direct impacts on habitats in relation to their siting and any access tracks required, and also potential impacts on species particularly birds and bats which can be struck by the moving blades. Care is needed to ensure that turbines are not located on migratory routes or on commuting routes between roosts and foraging areas for example. Hydro schemes also have potential ecological impacts through disturbance to the river bed and bank; impact on the watercourse as a habitat for fish and other aquatic creatures including through water abstraction; and impact on ecological value of other land affected by the development. The demand for woodfuel for biomass could also lead to the loss of deadwood habitats if wood is cleared from the forest floor. Domestic renewable energy schemes such as PV panels also need to ensure that there is no disturbance during installation or maintenance to species such as bats or barn owls which may be using the roof space. There is also emerging evidence that the reflection of polarised light from solar panels can be damaging to aquatic insects²¹⁶. Such impacts will need to be judged on a case by case basis and will need to be kept under review.
- 6.88. Whilst negative impacts need to be avoided or minimised, there are also potential wildlife benefits that can be gained from renewable energy schemes. For example careful management of woodlands for woodfuel could enhance biodiversity; energy crops such as miscanthus can provide cover and potentially over-wintering sites for birds and other species; water management for hydro could benefit aquatic species, for example some turbine types oxygenate the water which can benefit fish.

CULTURAL HERITAGE

- 6.89. The impacts on the historic environment should be assessed in accordance with policies CE-S4 Cultural Heritage and CE-D3 Conserving Heritage Assets, including impacts on heritage assets such as historic landscapes, listed buildings and Conservation Areas or their settings. Renewable heat systems such as solar panels or biomass boilers could also affect historic buildings and although these might not require planning permission, they may require listed building consent. Visualisations may be required to demonstrate the effects of a proposed wind turbine on historic landscapes or the setting of heritage assets. Hydro schemes may utilise existing buildings and the impact on any historic interest will need to be carefully assessed. The risk of potential damage to archaeology particularly during construction should also be assessed.
- 6.90. Potential schemes should include an assessment of the implications for archaeological remains, historic buildings and designed landscapes, as well as the historic character and associations of the wider landscape. Such assessments should embrace both the direct physical effects of projects and any indirect impacts, such as hydrological impacts in surrounding areas.

TRANQUILLITY, NOISE AND SHADOW FLICKER

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

²¹⁶ A Review of the Impact of Artificial Light on Invertebrates, Buglife 2011

considered, particularly in relation to biomass and anaerobic digestion plants according to likely levels of traffic to and from the site in order to transport biomass fuel and subsequent by-products.

- 6.92. A specific issue in relation to wind turbines is shadow flicker, where the shadow of the rotating blades falls across a dwelling and can cause light within the dwelling to brighten and darken. Government guidance²¹⁷ states that impacts are only likely to occur when the property is located within 130 degrees either side of north of a turbine, and that shadow flicker decreases with distance from the turbine, with a general guide of more than 10 rotor diameters from the turbine being seen as acceptable. However this may conflict with locating turbines close to existing buildings in order to reduce visual impact and so will need to be considered in combination with other objectives. Noise from wind or hydro turbines must also be assessed according to the latest standards. Applicants should provide information on the assessment of noise, vibration and shadow flicker impacts including noise associated with the construction, operation and (if relevant) decommissioning of the scheme. Noise limits may need to be set using planning conditions to protect general amenity and any nearby residential properties.

AIR AND WATER QUALITY, DUST, ODOUR

- 6.93. Air and water quality in the National Park are generally good, and any potential impacts from renewable energy schemes will need to be carefully considered.
- 6.94. Potential impacts on air quality can arise from the dust generated by biomass plants, particularly when large quantities of materials are required. The efficient burning of modern biomass boilers could however help to improve air quality, particularly in comparison to conventional oil or coal fuelled boilers.
- 6.95. Anaerobic digestion plants are by their nature odorous. Proposals should examine predicted odour effects and, if necessary, include mitigating measures such as odour control systems. However, anaerobic digestion plants also provide opportunities to deal with farm wastes such as slurry, which otherwise may form a potential pollution hazard.
- 6.96. The growing of biomass crops such as miscanthus could impact on water quality from the use of chemical fertilizers and pesticides, although generally such crops are low input, and once established, reductions in soil disturbance and erosion can also be achieved compared with conventional arable crops, thereby potentially improving water quality by reducing runoff and sedimentation²¹⁸.
- 6.97. The impact of hydro schemes on water quality and resources will need careful assessment, particularly during any required engineering or construction works and once the scheme is operational.

RECREATION AND ACCESS

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

TRANSPORT AND TRAFFIC

- 6.100. Transport of equipment to the site will need to be considered, for example the construction of wind turbines will require sufficient access for long and wide load items. The weight of individual components could also be an issue, and it is important that all sections of roads and bridges on the proposed delivery route can accommodate the size and weight of the loads.

²¹⁷ Update of UK Shadow Flicker Evidence Base, Parsons Brinckerhoff for DECC, 2011

²¹⁸ Planting & Growing Miscanthus Best practice guidance. Natural England 2007

- 6.101. Some renewable energy technologies may require regular transport movements, for example deliveries of biomass, or additional feedstock for anaerobic digesters. The impacts on rural roads, settlements and the tranquillity of the National Park will need to be considered.

GRID CONNECTION

- 6.102. The impacts of grid connection either by overhead cables or underground pipelines are important considerations, as they can have significant impacts on landscape, ecology and the historic environment. Policy AC-D5 (Fixed Line Transmission Infrastructure) requires that new connections are underground.
- 6.103. Most micro-generation technologies can either operate connected to a national or local grid or as stand-alone systems that power buildings directly or feed into an energy store, such as a battery. Micro-generation is particularly suited to rural locations where mains connectivity may not be available.

ENVIRONMENTAL ENHANCEMENT OR COMMUNITY BENEFITS

- 6.104. Whilst the potential impacts of renewable energy schemes need to be carefully considered, there may also be opportunities to provide environmental enhancement or community benefits, and applicants should include details of any such benefits in their proposals. This will include any carbon savings that will be achieved and reductions in greenhouse gas emissions.
- 6.105. Other environmental enhancement could include wildlife benefits from increased management of woodland and hedgerows for biomass. Low tech anaerobic digesters can be beneficial in reducing potential pollution hazards, and also assist in meeting the requirements of Nitrate Pollution Prevention Regulations²¹⁹ and extension of Nitrogen Vulnerable Zones.
- 6.106. There could also be some benefits from a shift to renewable heating systems, particularly in some settlements such as Dulverton and Porlock which are not on mains gas, and where there are high levels of solid fuel boilers (oil and coal in particular). The high price of oil and concerns over future security of supply, mean that a local, renewable source of fuel could greatly benefit communities. Through the Exmoor Carbon Neutral programme, the National Park Authority is encouraging communities to help tackle climate change, including through the installation of renewable energy technologies. The potential for communities to benefit from deploying and owning renewable energy generation capacity is of great interest; it offers an opportunity to engage communities in responding to climate change and for them to realise an income stream which could be used to fund local projects of their choice, helping to empower and build more cohesive communities in Exmoor.
- 6.107. Local communities may also benefit from the expansion of renewable energy technologies across Exmoor, including jobs for suppliers and contractors in installing and maintaining systems.

²¹⁹ Nitrate Pollution Prevention Regulations (NPPR) (2008)

CC-S3 LOW CARBON AND RENEWABLE ENERGY DEVELOPMENT

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

SMALL SCALE WIND TURBINES

CONTEXT

6.108. Whilst the National Park Authority is supportive of renewable energy, wind turbines are, by their very nature, often intrusive in the landscape. The Exmoor National Park Landscape Character Assessment (LCA) identified intrusive development as one of the main threats to landscape character. The LCA recognizes that Exmoor National Park “is small in extent and as such is fragile in relation to change – not least small cumulative issues that, collectively, can have a significant impact on the landscape”. The Exmoor National Park Partnership Plan 2012-17²²⁰ recognises that wind turbines can, individually and cumulatively, erode the unspoilt, uncluttered nature of the landscape and they can have a detrimental impact on tranquillity²²¹. The potential for exploiting the wind resource in Exmoor is therefore likely to be limited by the need to ensure that turbines do not detract from the statutory purposes to conserve the natural beauty, wildlife and cultural heritage of the National Park. Some landscapes such as moor and heath, including in coastal locations, are so sensitive to intrusive development from vertical structures due to their open vistas and wild character that it may not be acceptable to have any turbines. However, in other landscape types in the National Park, it may be possible for individual small scale wind turbines that are similar in scale to existing buildings and trees, against a backdrop or suitably screened and in an appropriate colour, to be assimilated into the landscape.

DEVELOPMENT AND SMALL SCALE WIND TURBINES

6.109. Consistent with the need to conserve and enhance the National Park’s natural beauty, turbines should generally be in the range of 10m to 15m in height to rotor tip. Occasionally, wind turbines up to a maximum of 20m height (to rotor tip) may be capable of being accommodated within the National Park given careful consideration of any potential impacts on National Park purposes. This maximum height reflects experience in assessing the impacts of wind turbine proposals some of which have approached 20m to the rotor tip. Turbines of this height have only been judged to be acceptable where the landscape is considered to be sufficiently robust, for example, where existing vertical features in the landscape such as a backdrop of trees

²²⁰ Exmoor National Park Partnership Plan 2012-2017

²²¹ The Exmoor National Park Partnership Plan recognises a special quality of Exmoor National Park as “A timeless landscape mostly free from intrusive development with striking views inside and out of the National Park and where the natural beauty of Exmoor and its dark night skies can be appreciated

have enabled a turbine structure to be accommodated, and where it would not break the skyline. Turbines approaching the range of 15-20m should be well related to existing vertical features such as trees which can be critical in providing a backdrop or screen and where the turbine cannot be viewed against the skyline from surrounding public viewpoints (including roads, rights of way and access land). Where trees are essential in providing screening or a backdrop, a management plan of ongoing maintenance will be a condition of any planning consent.

- 6.110. Large and medium scale wind turbines over 20m height (to rotor tip) and wind farms are not considered to be appropriate within the National Park given their intrusive nature and impacts on the landscape character and tranquillity.
- 6.111. In order to judge whether the potential impacts of a proposal are likely to be acceptable, applicants should consider the impacts of the wind turbine along with any required infrastructure such as road access, on site-tracks, turbine foundations, hard standings, anemometer masts, a construction compound, electrical cabling and an electrical sub-station and control building. Some of these features are permanent and others are required only in the construction phase and as such are temporary. Applications should include any necessary supporting information regarding the assessment of impacts on landscape, wildlife, cultural heritage, historic environment and other resources as set out under the issues to be considered in proposals for renewable energy development, policy CC-S3 paragraphs 6.78-6.107.

CC-D4 SMALL-SCALE WIND TURBINES

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

FREESTANDING SOLAR ARRAYS

CONTEXT

6.112. A solar array is a linked collection of solar panels. Given the sensitivity of traditional buildings in the National Park to roof mounted panels, a number of schemes have come forward that mount solar panels on the ground or on stand-alone frames.

DEVELOPMENT AND FREESTANDING SOLAR ARRAYS

- 6.113. Small-scale freestanding solar arrays that are well screened in enclosed gardens or closely linked to existing buildings with no or minimal visual impact may be preferable to visually intrusive roof mounted panels. There may also be some circumstances where ground mounted solar arrays to serve groups of properties, community buildings such as village halls, agricultural properties or other businesses are acceptable, where these are well screened within existing building complexes or by other landscape features such as hedgerows, walls or trees, and do not detract from any architectural or historic interest. However, freestanding arrays should be sensitively sited to avoid impacts on wildlife and land of high ecological interest. Applicants should highlight the benefits of a ground-mounted array in comparison to a roof-mounted array in these cases. Proposals should consider the potential impacts on the issues listed for renewable energy development, policy CC-S3, paragraphs 6.78-6.107, and provide relevant information to support the application. Policy CC-D1, Flood Risk should also be considered.
- 6.114. Ground mounted solar arrays may be preferable to a roof mounted solar panels. Where permission is granted in these circumstances, the National Park Authority will attach a condition removing permitted development rights for roof-mounted solar panels to ensure that the cumulative impacts of any future proposals can be properly assessed.
- 6.115. Visual impacts are likely to be more significant where large numbers of panels are proposed in isolation or unconnected to the buildings or properties that they are intended to serve. Siting a solar array system in a field may constitute a change of use of the agricultural land, which would require planning permission. Proposals for ground-mounted solar arrays that are sited in isolation away from existing built forms are likely to have significant impacts on landscape character and visual amenity and are not considered to be appropriate within the National Park.

CC-D5 FREESTANDING SOLAR ARRAYS

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

CC-S4 WASTE AND RESOURCE MANAGEMENT

Objective 21. *To minimise waste and related emissions and support opportunities for reuse and, resource recovery & recycling in ways compatible with Exmoor's National Park designation.*

PURPOSE OF THE POLICY

6.116. The National Park Authority is the Waste Planning Authority and this policy therefore sets out the planning policy for waste and resource management including anaerobic digestion.

POLICY CONTEXT

- 6.117. The Waste Framework Directive²²² defines waste as “any substance or object the holder discards, intends to discard or is required to discard”.
- 6.118. The overall objective of Government policy on waste, as set out in the strategy for sustainable development, is to protect human health and the environment by producing less waste and by using it as a resource wherever possible. The European Waste Framework Directive provides the overall direction for pursuing sustainable waste management. A review of this Framework put particular emphasis on the planning system in ensuring that waste management activities occur in sustainable ways at sustainable locations and that it is vital to apply the waste hierarchy. The waste hierarchy provides for more sustainable waste management through moving the management of waste up the ‘waste hierarchy’ of:
- i. Prevention: the most effective environmental solution is often to reduce the generation of waste, including the re-use of products;*
 - ii. Preparing for reuse: products that have become waste can be checked, cleaned or repaired so that they can be re-used;*
 - iii. Recycling: waste materials can be reprocessed into products, materials, or substances;*
 - iv. Other recovery, waste can serve a useful purpose by replacing other materials that would otherwise have been used; and*
 - v. Disposing only as a last resort: the least desirable solution where none of the above options is appropriate.*
- 6.119. Consideration must be given to application of the waste hierarchy, to distinguish between those waste management options which deliver energy as part of the process, and those which do not. The Department of Environment, Food and Rural Affairs provide guidance on this in ‘Guidance on applying the Waste Hierarchy’²²³. Further guidelines are set out in “Taking sustainable use of resources forward: A Thematic Strategy on the Prevention and Recycling of Waste”²²⁴ which aims to reduce the negative impact on the environment that is caused by waste, from production to disposal, via recycling. This approach means that every item of waste is seen not only as a source of pollution to be reduced, but also as a potential resource to be exploited.
- 6.120. It should be noted that the National Planning Policy Framework does not contain specific waste policies, but sets the national guiding principles of planning. National waste policy has also been reviewed and central government has issued a new National Waste Management Plan for England and a revised Planning Policy Statement (PPS) 10 for consultation. It is envisaged that this Local Plan, when published, will incorporate the revised government policy on waste.

CONTEXT

6.121. Responsibility for planning for waste management in Exmoor National Park rests with the National Park Authority (as Waste Planning Authority) and West Somerset and North Devon

²²² Waste Framework Directive (European Directive (WFD) 2006/12/EC), as amended by the new WFD (Directive 2008/98/EC, came into force in December 2010)

Once a substance or object has become waste, it will remain waste until it has been fully recovered and no longer poses a potential threat to the environment or to human health

From this point onwards, the waste ceases to be waste and there is no longer any reason for it to be subject to the controls and other measures required by the Directive

²²³ <http://www.defra.gov.uk/publications/files/pb13530-waste-hierarchy-guidance.pdf>

²²⁴ European Union: “Taking sustainable use of resources forward: A Thematic Strategy on the prevention and recycling of waste” needs date

District Council (as Waste Collection Authorities). Domestic waste collection in Exmoor National Park is undertaken by contractors on behalf of the Somerset Waste Partnership and North Devon District Council. This waste is taken to waste recycling and treatment facilities outside the National Park based on contracts between the collection/disposal authorities and the waste industry and waste is also taken to small reuse and recycling points within Exmoor National Park.

- 6.122. Given the overlap of administrative boundaries, the relevant waste planning authorities of Exmoor National Park Authority and the County Councils of Somerset and Devon, have agreed to work together closely in order to continue to achieve sustainable waste management.

DEVELOPMENT AND WASTE

- 6.123. Both Devon and Somerset County Councils agree with the National Park Authority that the provision of large scale waste facilities for disposal, processing, recovery and recycling is inappropriate on Exmoor due to the area's designation as a National Park. Facilities for the disposal of domestic, industrial and commercial waste are incompatible with National Park purposes because of potential adverse impacts and because they may require the importation of waste which is deemed inappropriate in a National Park. Exmoor National Park policy will therefore presume against new waste facilities within the National Park, and no sites will be allocated. Specialised processing sites such as commercial composting and recycling plants will also be inappropriate, because of the potential adverse impacts including on the landscape and the potential for air, land and water contamination (CC-S5 Pollution).
- 6.124. Through the Somerset Waste Core Strategy and Devon Waste Plan, and municipal waste management strategies, Somerset and Devon County Councils and the Somerset Waste Partnership will therefore plan for management of domestic waste arising from within the National Park. Data for domestic waste arising from West Somerset and North Devon Districts have informed both County Councils' technical evidence base on capacity requirements. This means that domestic waste from within Exmoor National Park will continue to be treated or disposed of outside the National Park.
- 6.125. Waste collection from commercial and industrial premises within Exmoor National Park is carried out by commercial licensed waste carriers. Devon and Somerset County Councils have agreed to plan for the management of commercial and industrial waste from within Exmoor National Park, using the same source of baseline data provided by Defra²²⁵ in 2010. Somerset County Council also carried its own industrial and commercial waste survey to inform planning work; the results of which can be found on the Somerset County Council website²²⁶. The Waste Planning Authorities have agreed to liaise closely in monitoring overall waste arising in the National Park area during the lifetime of their respective Local Plans.
- 6.126. Construction and demolition waste arising in the Exmoor National Park area is not expected to be significant given the level of current development in the National Park. However, (small-scale) major planning applications, i.e. for 10 or more dwellings or buildings greater than 1000sqm, are likely to generate a considerable volume of waste compared to the majority of minor developments in the National Park and CC-S4 therefore requires that they should demonstrate how waste will be minimised and sustainably managed, both through the construction phase of the development, and its subsequent operation. This should include the potential for appropriate local reuse of topsoil and other relevant materials in order to reduce transport miles. A waste audit action plan will be required and included as part of the planning application and should provide the following information²²⁷:
- a) The likely nature and volume of waste generated through construction
 - b) How the design and layout of the development will minimise the amount of waste generated during the construction phase and the steps taken to separate and re-use appropriate wastes on site – where there will be no harmful impact on the environment or local amenity. Consultation with the Environment Agency, as regulator is advised as part of this process as well as Exmoor National Park.

²²⁵ <http://archive.defra.gov.uk/evidence/statistics/environment/waste/wrindustry.htm>

²²⁶ Document SD8e - <http://www.somerset.gov.uk/irj/public/services/directory/service?rid=/guid/1007f859-76a1-2e10-94a4-dbe534b91758>

²²⁷ Planning for Sustainable Waste Management: Companion Guide to Planning Policy Statement 10 (DCLG 2006)

- c) How and where waste that cannot be re-used on site will be managed in accordance with the waste hierarchy including the potential for local reuse, and in accordance with environmental permitting and duty of care.
 - d) In accordance with Approved Document H of the Building Regulations; details how waste will be managed sustainably once the site is operational e.g. incorporating storage space for recycling materials. The Somerset Waste Partnership, as waste collection authority has produced guidance on this²²⁸, and applicants are urged to contact them for proactive discussion.
- 6.127. It is also important to integrate waste management considerations into non waste developments, particularly by seeking to minimise the generation of waste in new developments, alterations and extensions, encouraging sustainable construction methods including the use of recycled materials and ensuring that construction and demolition waste is managed and re-used.
- 6.128. The National Park Authority recognises the role that Exmoor's communities can play in making more sustainable use of resources. Applying the waste hierarchy in a National Park context and measures which encourage the recycling and responsible reuse of waste will therefore be encouraged where local, very small scale, community-based waste projects which deal exclusively with the waste arising from that individual community for reuse, recycling, or community composting. Community facilities should be well related to settlements, as in accordance with GP4, to reduce the need to travel, providing there is no unacceptable adverse impact on local communities and amenity, and the landscape, wildlife and cultural heritage of the National Park.
- 6.129. Landscape and environmental impacts are likely to be greater in the open countryside outside settlements where this type of development is unlikely to be acceptable. Additionally, management of waste through small scale anaerobic digesters dealing with a mixed waste stream (which may include agricultural waste or manure and slurry) may be encouraged. Farm facilities should be suitably located on the farm to avoid impacts on the natural and cultural environment and traffic generation. In all cases, however, such proposals will only be permitted with appropriate safeguards to ensure that no waste is imported from outside the community and also to ensure that there will be no significant impact on the environment, the local community, and National Park purposes as set out in GP1. Environmental permitting and waste transfer carriers advice should be sought from the Environment Agency as regulator.
- 6.130. The National Park Authority will require appropriate restoration of waste sites to achieve National Park purposes. Such schemes should seek to achieve the conservation and enhancement of the National Park including for geodiversity, biodiversity, green infrastructure, historic environment and quiet enjoyment of the National Park.
- 6.131. Waste from sewage can harm the environment where capacity is exceeded and as a result of its transportation. To ensure environmental quality and the health and amenity of the National Park's residents is safeguarded, sewerage capacity and sewage disposal (including the process of disposal) must be appropriately managed. Exmoor National Park will seek to continue discussions around arisings and capacity with South West Water and Wessex Water as service providers. Policy CC-S4 Waste and Resource Management together with Policy CC-D6 Sewerage Capacity and Sewage Disposal seek to ensure that these impacts are avoided and to provide appropriately for new or extended sewage infrastructure.

DEVELOPMENT AND ANAEROBIC DIGESTION OF AGRICULTURAL MANURE AND SLURRY

- 6.132. Despite the rural nature of the National Park, agricultural waste (including manure, slurry and spoiled straw) is not generally a significant issue for disposal as most is distributed naturally on pasture, collected from barns and agricultural sheds and managed in slurry pits or composted on the farm, then spread on the land as a natural fertiliser. It does require consideration however, particularly in those areas of the National Park designated as a Nitrate Vulnerable Zone (NVZ)²²⁹, which is a strip running along the south west boundary with Devon. Guidance on NVZs is given by Defra and the Environment Agency on the storage of organic manure based on the requirements of the Nitrate Pollution Prevention Regulations²³⁰. Restrictions on

²²⁸ Developer Guidance: <http://www.somersetwaste.gov.uk/about/developers/>

²²⁹ Defra (2009) Guidance for farmers in Nitrate Vulnerable Zones, Storage of Organic Manure

²³⁰ OPSI (2008) The Nitrate Pollution Prevention Regulations (SI 2349)

spreading may increase the need for either more storage facilities or for treatment by methods such as anaerobic digestion and the spreading of digestate on the land holding.

- 6.133. Development of new farm or agricultural waste facilities such as pits or tanks is normally permitted development but can require planning permission in some circumstances, usually because of proximity to housing, protected buildings or highways. Where permission is required for development to address animal waste (excluding carcasses), policies seek to help farmers to manage agricultural waste and protect the environment. Small-scale waste management facilities on farms may be permitted provided in part that waste arises from the farm or farms concerned, and any development in line with Environment Agency waste permitting requirements can be accommodated without harm to the area including to the National Park's special qualities and to avoid any adverse impact on local amenity, landscape, wildlife and cultural heritage and traffic generation. Proposals will be dealt with through Policy SE-S4: Agricultural and Forestry Development in Section 8 of this Plan. Where proposals have the potential to cause pollution, they should be consistent with Policy CC-S5: Pollution.
- 6.134. Anaerobic digestion can help to protect the environment by processing manure, slurry, animal faeces, urine, and spoiled straw into digestate and biogas. The digestate can be spread on the land, providing it meets strict protocol and quality requirements laid out by Defra and the State Vet. The Environment Agency considers that manure and slurry used as feedstock materials for anaerobic digestion and any biogas produced from manure and slurry is waste²³¹. Waste regulatory controls therefore apply. Regulations²³² specify the type and volume which can be classed as an exempt waste operation at premises used for agriculture, and the procedures to register an exemption; these legislative and procedural issues do not form part of the planning application process. The Environment Agency also advises that spreading of digestate should be in accordance with existing codes of good agricultural practice and nitrate vulnerable zone (NVZ) requirements to prevent nutrient overload and pollution. Digestate must conform with standards set out in the Quality Protocol and PAS 110²³³ to be spread as fertilizer, if it doesn't comply, it is considered a waste and appropriate waste management controls will apply to its transfer, handling and disposal. Proposals should comply with CC-S5: Pollution.
- 6.135. Single on-farm units are more likely to be acceptable in terms of scale given the area's National Park designation. Applications for single on-farm units, and any associated development for management of waste or renewable energy generation should only use agricultural manure and slurry arising on and crops grown for the purpose on the farm holding, and the National Park Authority will attach conditions to any granting of planning permission to ensure that this is the case. As with all cases, environmental permitting advice should be sought from the Environment Agency as regulator. Proposals will also need to accord with Policy CC-S3: Low Carbon and Renewable Energy Development.
- 6.136. There may be circumstances where farms in close proximity wish to group together to achieve economies of scale & economic viability and so that there is sufficient feedstock for the digestion process. In such cases, the National Park Authority will require that the proposal deals only with agricultural manure and slurry from, and crops grown for the purpose on those farms. A waste management plan will be required to enable the National Park Authority to assess whether a shared facility is practicable, and whether the scale of both the development and operation of the proposal including traffic movements are acceptable within the locality and the National Park as a whole. Where permission is granted, the National Park Authority will attach a condition to the permission to ensure that the feedstock materials for the anaerobic digester come from specified farm holdings. Environmental permitting and waste transfer carriers advice should be sought from the Environment Agency as regulator
- 6.137. Proposals for anaerobic digesters will be considered under policies CC-S1 and CC-S3 together with the supporting text above. However, anaerobic digester proposals dealing with a mixed waste stream (which may include agricultural waste, bio crops or manure and slurry) will be considered as waste and considered under CC-S4: Waste Management and the supporting text above.

²³¹ <http://www.environment-agency.gov.uk/business/sectors/37338.aspx>;

http://www.environment-agency.gov.uk/static/documents/Business/Anaerobic_Digestion_and_Environmental_Permitting.pdf & http://www.opsi.gov.uk/si/si2010/draft/ukdsi_9780111491423_en_1

²³² HMSO (2009) Environmental Permitting (England and Wales) (Amendment) (No. 2) Regulations

²³³ PAS 110: <http://www.wrap.org.uk/system/files/private/BSI%20PAS%20110.pdf>

CC-S4 WASTE MANAGEMENT

- 1. The National Park Authority will work with the Waste Collection and Disposal Authorities, and devolved authorities such as the Somerset Waste Partnership and local communities to promote sustainable management of waste through the waste hierarchy.**
- 2. Large scale waste facilities, including landfill sites, will not be permitted in the National Park.**
- 3. Waste facilities for small scale reuse, recycling, composting and anaerobic digesters dealing with a mixed waste stream will only be permitted to meet the identified needs of and serve individual local communities, and where do not include importation of waste from outside that community. Community waste facilities should be well related to settlements, as in accordance with GP4, to avoid the need to travel and avoid any unacceptable adverse impact on local communities and amenity, and the landscape, wildlife and cultural heritage of the National Park. Proposals for anaerobic digesters should also accord with policy CC-S3: Low Carbon and Renewable Energy Development. Farm facilities should be suitably located on the farm to avoid impacts on the natural and cultural environment and traffic generation.**
- 4. Construction and demolition waste should be minimised and must be managed and re-used on site where there will be no harmful impacts. Where re-use on site may result in an environmental risk to biodiversity, the historic environment (such as archaeology) or setting of a heritage asset, local communities or the water environment, appropriate off-site waste management or disposal will be required. Environmental permitting and waste transfer carriers advice should be sought from the Environment Agency as regulator.**
- 5. Applications for all major developments (for 10 or more dwellings or buildings greater than 1000sqm) must demonstrate how the construction and operational phases of the development will be consistent with the principles of sustainable waste management through a waste audit statement.**
- 6. The National Park Authority will require the appropriate restoration and after-use of waste sites, through the application of appropriate conditions where necessary, based upon conservation and enhancement of geodiversity and biodiversity, the historic environment and quiet enjoyment of the National Park.**
- 7. The design of new development should incorporate adequate storage for recycling waste (CE-S7). Development comprising of domestic properties must seek guidance from the Somerset Waste Partnership and their access requirement.**
- 8. Proposals relating to waste water and sewage facilities for storage and disposal should be consistent with Policies GP1 and CC-D6 to ensure that such infrastructure is appropriate in terms of its location, scale and design to avoid adverse impacts on the National Park and surrounding area. Ongoing dialogue with water utility companies will help to achieve this.**

SEWERAGE CAPACITY & SEWAGE DISPOSAL

PURPOSE OF POLICY

- 6.138. National policy advocates healthy communities and the protection of the environment²³⁴.
- 6.139. Sewage disposal (including the process of disposal) is important for the protection of public health. However it can have negative impacts on the environmental quality of land, air and water where capacity is exceeded. Policy CC-D6 seeks to ensure that public health, amenity and environmental quality are safeguarded from the impacts of sewage disposal. New or extended sewerage infrastructure should be provided for appropriately and any negative impacts should be avoided or managed suitably. For the purposes of this policy, sewerage infrastructure refers to new or extended sewage treatment works, the transfer, processing, disposal or storage of sewage.

CONTEXT

- 6.140. On Exmoor, Wessex Water and South West Water are the operators for mains waste water treatment. Additionally, a number of private operators dispose of non-mains sewage in the area. Sewerage infrastructure within the National Park is relatively small scale but forms an important component of the area's utility provision. Additional sewerage infrastructure or the expansion of existing infrastructure may be required during the lifetime of this plan²³⁵ but are likely to be small scale due to the size of the population. Sewage from non-residential development such as from boats, recreational development, and businesses can also impact on the capacity of sewerage works.
- 6.141. Public mains sewerage infrastructure and non-mains sewerage, including septic tanks, are essential for public health, the maintenance of water quality and the prevention of pollution but can themselves have amenity, public health and environmental implications if they are not managed appropriately. The scale, siting and appearance of sewerage works are important considerations to ensure that what may otherwise be intrusive development is acceptable in the National Park.
- 6.142. Environmental impacts such as emissions and discharges are controlled under other legislation outside of planning management and are monitored by the Environment Agency²³⁶. Sewage treatment plants are classified as 'less vulnerable' development in areas of flood risk. Therefore provided adequate pollution control measures are in place, sewage transmission infrastructure and pumping stations are seen as water-compatible development (CC-D1 Flood Risk).

TYPES OF SEWAGE DISPOSAL

- 6.143. Sewage is carried from its source to the works by two types of sewerage system. In more modern systems, foul sewers are separated from systems that collect stormwater run-off, which is discharged directly into natural watercourses. It is however common, particularly in older areas, for foul and stormwater systems to be combined. In combined works, the flow and concentration of sewage entering treatment plant vary with rainfall, and when higher flows occur part of the sewage may be diverted and held in stormwater tanks. If the flow is very high, the sewage may be discharged, untreated into the surface watercourse. Ensuring the capacity of sewerage infrastructure is not exceeded is therefore essential to protect the environmental quality, public health and amenity of the National Park. The recycling and reuse of rainwater and greywater helps to minimise risks of overloading sewerage infrastructure and are encouraged in the National Park (CC-D3 Water Conservation).
- 6.144. Sludge is treated outside the National Park by sludge treatment centres. Some sewage may be treated by private operators which are small and localised. Sewage treatment can result in a range of wastes which are deposited in different ways. Currently sludge recycling to agricultural land is accepted by DEFRA and the EA as the most sustainable option²³⁷. With

²³⁴ Para X CC-S4 Waste Management

²³⁵ Consultation results demonstrated people wanted to ensure adequate sewage infrastructure, including the extension of sewage treatment plants is provided in the National Park

²³⁶ For more information please see the Environment Agency website

²³⁷ Sewage works and sewage farms: industry profile. Department of the Environment Industry Profile (1995)

advances in technology the operation area required for sewerage infrastructure has reduced in recent years.

PUBLIC HEALTH, ENVIRONMENT AND AMENITY

- 6.145. Sewerage works are essential to protect public health. The sewage treatment process may however result in point source localised contaminated land on site from organic pollutants and pathogens. Due to the nature and function of sewage treatment works it may be inappropriate to locate the development it serves in close proximity to sewage works to protect the amenity and health of the public²³⁸. The degree of any nuisance will vary according to the design and age of works, associated landscaping, local topography and prevailing wind. The enclosure of works and effective odour control measures can be used to mitigate against some of these impacts²³⁹. The advice of the appropriate water company/sewerage undertaker will be sought on individual cases.
- 6.146. The impact on water quality is a key consideration for applications regarding sewerage works with the possibility of pollution from the discharges of sewage infrastructure. Good water quality is important for Exmoor's biodiversity. As a result of the 1998 European Directive²⁴⁰ which prevented the discharge of sewage into the sea, improvements were made to the plant at Lynmouth and a new plant was built at Porlock. Problems regarding water quality can however still occur due to overflows from combined sewer outflows or high rainfall which can lead to organic material diffusing into rivers and out to sea. Non-mains drainage proposals, including the use of septic tanks, may have an adverse effect on the environment when there is a high water table or if the site is susceptible to flooding. This is likely to be exacerbated by the impacts of a changing climate which may mean that flood resilience measures to avoid overflows are required.

CAPACITY ISSUES

- 6.147. Housing development, in particular, can potentially increase the risk of water quality being affected due to extra loads being placed on sewerage works. The capacity of the sewerage infrastructure will be a key consideration in the drainage design process of any application. Where it is physically possible, development should connect to a public mains sewer and satisfactory arrangements should be made in consultation with the appropriate sewerage undertaker for the area to ensure the sewerage infrastructure can cope appropriately with additional demands before the development is occupied or activated.
- 6.148. If connection to a public sewer is not feasible, or available, other measures such as a sewage treatment plant incorporating a combination of treatment processes should be considered which will meet the standard and conditions set by the Environment Agency (EA) and are appropriate in the National Park context. Developers are encouraged to make a full assessment of the suitability of any proposals for non-mains sewerage systems at the project design stage. Only where mains sewage or a combined sewage treatment system are not feasible, taking into account practicability, and the scale and size of a development, should a system incorporating septic tank(s) be considered. Where an affordable housing proposal has public mains sewerage constraints but is otherwise acceptable, the provision of septic tanks could be considered as part of the proposal (HC-S1 Housing). A proliferation of small private sewage treatment plants should however be avoided where possible, for reasons including landscape impact and a greater risk of environmental pollution.

CONSIDERATIONS FOR SEWERAGE INFRASTRUCTURE PROPOSALS

- 6.149. The design of sewerage infrastructure whether for additional capacity, the replacement or new facility, public or private, should result in the efficient use of infrastructure and should be compatible with the surrounding amenity, environment, public health and landscape. Both proposals for sewerage infrastructure and development that produces sewage must ensure any associated problems are avoided. Planning applications should, therefore, be supported by a full assessment of the proposed use of sewerage infrastructure.

²³⁸ Consultation highlighted concern over the loss of amenity through odour and noise from some local sewage works

²³⁹ Types of nuisances are listed in clause 1.b) of Policy CC-D6

²⁴⁰ <http://www.environment-agency.gov.uk/business/regulation/31907.aspx> [reference needs updating but you can find information about the directive here]

- 6.150. Assessment should include a thorough examination of the impact of disposal of final effluent²⁴¹. The National Park Authority encourages pre-application discussions on any impact proposals will have including on the environment, amenity and public health. Proposals must demonstrate that opportunities to mitigate impacts are taken. Pollution should also be taken account of and be consistent with CC-S5 Pollution. The Environment Agency (EA), and the relevant undertaker for the area will be important stakeholders and consultees in considering any appropriate sewage improvements which may be required for a proposal. Views from other key bodies such as neighbouring LPAs, Health Authorities, Natural England and Drainage Boards may also be material in assessing the suitability of sewerage infrastructure and development requiring sewerage infrastructure improvements. An Environmental Permit or exemption will be required from the EA if it proposed to discharge treated sewage effluent to controlled waters or ground.
- 6.151. Under section 106 of the Water Industry Act 1991, and supported by planning case law, when connecting to a public mains sewer it is the undertaker's statutory duty to deal with the burden of additional discharge and not that of the developer. Conditions may be used where appropriate to ensure sewerage infrastructure is in place before the development is occupied or activated to avoid potential overloading whilst allowing appropriate development to be permitted.
- 6.152. Proposals which require non-mains sewerage must demonstrate that the proposal cannot be connected to a public mains sewer and must ensure arrangements are made to ensure sewerage capacity is not exceeded before development proceeds.
- 6.153. If proposals require non-mains sewerage infrastructure and are assessed as being unsatisfactory, including where they are likely to lead to a significant environmental, amenity or public health problem(s) which cannot be overcome by means of a condition, planning permission will be refused. This will be the case even if the proposal is a temporary measure and will also apply to issues around maintenance and capacity.

CC-D6 SEWERAGE CAPACITY & SEWAGE DISPOSAL

- 1. Development proposals for or which require new or extended sewage infrastructure will be permitted where it can be demonstrated that the facility will pose no unacceptable harm to public health, amenity or environmental quality. The following criteria must also be satisfied:**
 - a) appropriate location, scale and design of the infrastructure (CE-S6);**
 - b) use of necessary mitigation measures (including climate change resilience measures), to avoid impacts on surrounding areas including noise, air, soil and water pollution, odour (CC-S5), litter, visual intrusion, and other disturbances; and**
 - c) connection to a public mains sewer, where available and physically possible. Where existing capacity is insufficient, proposals should—contribute to an integrated and adequate network of sewage treatment installations, sufficient to meet the needs of existing and proposed development; Proposals which require non-mains sewerage must demonstrate that the proposal cannot be connected to a public mains sewer.**
- 2. Satisfactory arrangements should be made to ensure the public sewerage infrastructure can appropriately manage the additional required capacity of the proposal before the development is occupied or activated.**
- 3. Development proposals which exceed the capacity of private sewerage infrastructure or which do not otherwise include satisfactory arrangements consistent with the requirements of this policy will not be permitted. For development proposals that require new or extended private sewerage infrastructure, this must be provided before commencement of development to ensure current sewerage capacity is not exceeded.**
- 4. Regularly occupied development such as residential buildings will not be permitted in locations likely to be unacceptably affected by the proximity of sewerage infrastructure.**

²⁴¹ DETR Circular 03/99 (1999) Planning Requirement in respect of the Use of Non-Mains Sewerage incorporating Septic Tanks in New Development

POLLUTION

PURPOSE OF POLICY

6.154. Pollution can lead to environmental damage, loss of amenity, detrimental impacts to quality of life, cause health issues and deplete our natural resources. Pollution can also damage Exmoor National Park's special qualities including its tranquillity, dark night skies and habitats which support a great diversity of wildlife²⁴². Pollution can result from point or diffuse sources from various activities which can have direct or indirect impacts. Policy CC-S5 seeks to ensure that new and existing development; does not contribute to, is put at unacceptable risk from, or is adversely affected by unacceptable levels of pollution²⁴³.

NATIONAL CONTEXT

6.155. National policy advocates sustainable development, of which there is an environmental dimension, part of this role seeks to minimise pollution. Nationally it is noted that part of the core land-use planning principles which underpin both plan-making and decision-taking is the contribution to reducing pollution. The planning system should ensure that new and existing development does not contribute to and is not adversely affected by unacceptable levels of pollution (including cumulative impacts) and land should be remediated where appropriate. Planning focuses on whether development is an acceptable use of the land and impacts of use. The control of processes or emissions regarding pollution is subject to approval under other pollution control regimes which fall outside of planning powers²⁴⁴.

6.156. Planning and pollution control operate within different legislative frameworks but complement each other. Pollution control aims to prevent pollution by limiting the release of substances and ensuring air and water quality meet standards that guard against impacts to the environment and human health. The planning system has an important role in determining whether the development, use of land and any impacts arising are acceptable. This includes consideration of additional pollution generated by road traffic, the demand for natural resources and any discharges to the environment associated with the proposed development.

CONTEXT

6.157. There are various types of pollution which include air, soil, water, light and noise. Pollution may be generated outside the National Park boundary but may affect the area including local communities within it, or may be generated within Exmoor but affect areas and local communities outside. Partnership working with neighbouring authorities is therefore important to prevent and address pollution sources²⁴⁵. Pollution can also be reduced by the actions of individuals, for example, car sharing, using sustainable transport modes, minimising water usage, and minimising artificial lighting to protect Exmoor's dark night skies (CE-D1 Protecting Exmoor's Dark Night Sky).

AIR POLLUTION

6.158. Although Exmoor's air quality is generally good, it can be affected by pollution-laden winds from areas outside the National Park, including mainland Europe²⁴⁶. The 2007 Air Quality Strategy²⁴⁷ sets out plans to improve and protect the air quality in the UK. Good air quality is important for human health and sensitive habitats such as Exmoor's internationally important heathland and oak woodlands. Some of Exmoor's habitats are sensitive to acidification which can be caused by pollutants such as sulphur and nitrogen oxides which create acid rain. In 2006, the EA and English Nature undertook an assessment that showed that overall nitrogen

²⁴² Exmoor National Park Partnership Plan 2012-2017

²⁴³ Para 26 NPPF 2012 DCLG 'preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of land, air, water or noise pollution or land instability'

²⁴⁴ NPPF 2012 DCLG

²⁴⁵ YFE events community, YFE stakeholder, YFE member/staff events, Schools Ilfracombe, Petroc: Working with others to avoid and address pollution sources within and outside of the NP was supported in consultation.

²⁴⁶ Exmoor's Core Strategy and Development Management Policies Sustainability Appraisal Scoping Report

²⁴⁷ DEFRA (2007) Air Quality Strategy

deposition exceeded the maximum critical loads for blanket bog and old sessile oak woods on Exmoor indicating that they could be at risk from air pollution²⁴⁸.

- 6.159. District Councils have a statutory duty for local air quality management²⁴⁹. They are required to carry out regular reviews and assessment against national objectives. Where it is found that objectives are unlikely to be met, air quality management areas (AQMA) must be designated to tackle the issue of air quality. Although no AQMA have been designated within Exmoor National Park, national surveys show that ground level ozone levels on Exmoor can occasionally reach very high levels during certain atmospheric conditions and can exceed European guidelines²⁵⁰. This can be harmful to human health, but such impacts cannot be controlled through planning policy.
- 6.160. Future development on Exmoor has the potential to detrimentally impact local air quality and therefore should be managed appropriately. Some proposals could lead to increased air pollution and in these cases the application must include measures to demonstrate that impacts are minimised to an acceptable level. Consideration should be given to neighbouring properties including the impact of unpleasant odours. The emission of greenhouse gases from development is an issue not only locally but in a wider context²⁵¹.
- 6.161. Development within the National Park is generally small in scale and so is unlikely to cause significant impacts on air quality. However some proposals can have the potential to cumulatively cause air pollution including through their impact on the surrounding transport network; opportunities for sustainable transport measures will therefore be a key consideration (AC-S1 Sustainable Transport). Other measures to improve air quality can include energy-efficiency measures in building design and construction as well as the use of appropriate low carbon renewable energy sources (CC-S1 Climate Change Mitigation & Adaptation; CC-S3 Low Carbon & Renewable Energy Development, CE-S7 Design & Sustainable Construction Principles).

SOIL POLLUTION AND CONTAMINATED LAND

- 6.162. Soil pollution can arise from different sources including agricultural activities and fuel storage. For Nitrate Vulnerable Zones (NVZ) guidance is given by DEFRA and the EA on the storage of organic manure based on the requirements of the Nitrate Pollution Prevention Regulations. Good agricultural practice for farmers, growers and land managers is also provided.
- 6.163. Soil pollution can lead to contaminated land, which can in turn can lead to a number of issues including impacts on human health, buildings (chemical and physical), and the natural environment where pollution affects ecosystems and wildlife populations. Land contamination is not restricted to previously developed industrial land but can also occur on greenfield sites and from natural sources as well as human activities. North Devon and West Somerset District Councils are required to identify, inspect and remediate land in its district for contamination²⁵².
- 6.164. Planning also has a role to play in dealing with contaminated land as it provides the means to secure appropriate investigation and remediation. In following this approach, land contamination is a material consideration. Where development is proposed on land that could be contaminated, a site investigation will usually be required. If contamination is found, remedial works would be required to make the land suitable for its intended end use²⁵³ as a condition of any planning permission.
- 6.165. Contamination may create issues away from its source through transport as a result of wind or water for example. Proposals for development such as housing with gardens, schools, nurseries or allotments where contaminated land would be a particular issue, should consider its possible presence. Each area of potentially contaminated land is likely to be different in terms of its particular contamination and a site specific approach to remediation will therefore be necessary. The EA has a role in assisting Local Authorities on providing site-specific local guidance.

²⁴⁸ Exmoor National Park Authority Sustainability Appraisal Scoping Report (2011) - further information is also available from Exmoor's Habitat Regulations Assessment

²⁴⁹ The Environment Act 1995

²⁵⁰ Exmoor National Park Authority Sustainability Appraisal Scoping Report (2011)

²⁵¹ Exmoor Carbon Neutral Study

²⁵² Under Part IIA of the Environmental Protection Act 1990 (EPA), which came into force on the 1st of April 2000

²⁵³ North Devon Contaminated Land Strategy 2009-2014 and West Somerset Council Environmental Health and Licensing Contaminated Land Inspection Strategy 2011 to 2015

- 6.166. A wide range of industries may historically have contaminated, or have the potential to contaminate the land they are sited upon (as well as neighbouring land). The Environment Agency set out further details on the processes, materials and wastes associated with individual industries which have potentially contaminating land uses and situations where land may be affected by contamination. This includes:
- a) Agriculture
 - b) Timber treatment
 - c) Naturally occurring radioactivity including radon
 - d) Methane and carbon dioxide production²⁵⁴
- 6.167. When determining planning applications for land that may be contaminated, the National Park Authority will consider whether the proposal takes acceptable account of contamination and whether actions are taken to remediate land to protect the environment and health of future users of the land if contamination is found. As Exmoor has a long history of mineral extraction there may be a number of sites within the National Park which have some pollution risk if disturbed.

WATER POLLUTION

- 6.168. Exmoor's high quality clean water resource is vital to a wide range of interests including its nature conservation, fisheries, water supply and bathing water quality as well as its amenity value. Exmoor's river corridors provide important wildlife habitats and make an important contribution to the landscape of the National Park. Overall the quality of Exmoor's rivers are rated as very good or good by the Environment Agency. However, there have been some instances where some of Exmoor's rivers have been identified as poor in terms of ecological status²⁵⁵.
- 6.169. Poor water quality can be the consequence of a range of diffuse sources and point source pollution including agricultural activities, abstraction, disused mines, industrial discharges, accidental spillage, sewage discharge (CC-D6 Sewerage Capacity & Sewage Disposal) and the physical modification of water bodies. To ensure the high quality water environment in Exmoor is maintained, activities in catchments, and those directly affecting the water resource itself, must be managed. Although many of these activities lie outside planning control, planning has a significant role in avoiding and mitigating the impact of pollution from new development proposals, such as through their location and design. Pollutants arising from agricultural activities may include silage effluent, milk and slurry. In some cases the use of covers on slurry stores may be appropriate to reduce the risk of overflowing and discharge.
- 6.170. Exmoor's water resources may come under pressure from development outside the National Park in nearby towns such as Barnstaple, Tiverton, Exeter and Taunton. Increased abstraction of water can lead to low water flows and a lowering of water tables. Lower levels of water can result in a higher concentration of contaminants and can therefore lead to poor water quality. Furthermore climate change is likely to add to the issue of low water flows. Water conservation is therefore closely related to water quality. Catchment abstraction management strategies are produced by the Environment Agency for the management of local water resources and should be referred to by proposals which may have an impact on water resources (CC-D3 Water Conservation). Flooding can also precipitate pollution and proposals which may affect or be affected by flooding should be consistent with CC-D1 Flood Risk. Opportunities to minimise environmental damage and diffuse pollution through the incorporation of sustainable drainage systems is supported (CE-S7 Design & Sustainable Construction Principles).
- 6.171. New development which may affect groundwater in certain areas of the National Park must take into account groundwater Source Protection Zones (SPZs), shown on the Proposals Map, and aquifer designations²⁵⁶. The emphasis is on the prevention of pollution rather than a reactive approach in cleaning up pollution issues. This approach minimises future issues. Necessarily, the need to protect groundwater in these zones places constraints on certain types of development particularly those such as landfilling, slurry tanks, oil storage, chemicals and housing which is dependent on effluent disposal through soakaways. Indirect issues

²⁵⁴ The Environment Agency website which include Department of the Environment (DoE) Industry Profiles

²⁵⁵ AMR 2010-2011

²⁵⁶ The Environment Agency provides the latest groundwater SPZ's and aquifer designation data and maps. For further information refer to the Environment Agency website.

including disturbance of contaminated land and its impact on water resources must also be considered in development proposals (see section on ‘Soil Pollution and Contaminated Land’).

LIGHT AND NOISE POLLUTION

- 6.172. The proliferation of artificial lighting has led to the deterioration of the night sky in some areas. The reduction or elimination of unnecessary artificial lighting should be aimed for; this not only helps to protect the special quality and Exmoor’s Dark Sky Reserve status²⁵⁷ but can have other benefits of reducing carbon emissions, reducing adverse impacts on nocturnal wildlife and habitats, increasing public awareness of the cultural heritage associated with the views of the dark night sky and stimulating night time economic development and public access to the National Park. The promotion and restoration of the dark night sky is strived for in Exmoor²⁵⁸. Proposals should therefore demonstrate management of light pollution is consistent with CE-D1 Protecting Exmoor’s Dark Night Sky. Proposals that are likely to result in unacceptable light pollution will not be appropriate in the National Park including from illuminated advertisements (CE-D4 Advertisements, Shopfronts and Private Road Signs). Good design can limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation²⁵⁹; further guidance is available in the Lighting Management Plan²⁶⁰.
- 6.173. Tranquillity which results from the experience of a combination of low noise and dark night sky is a special quality of Exmoor. The quiet enjoyment of the National Park is supported by Policy RT-S1 Recreation & Tourism. The impact of noise is a material consideration in determining planning applications; unacceptable intrusive noise generating development is inappropriate in the National Park context and will not be permitted where it would have a significant adverse impact on Exmoor’s special qualities, health, environment, surrounding land uses, quality of life or amenity. Adverse impacts should be minimised and reduced. Planning obligations and conditions may be used to mitigate the effects of noise (GP1 National Park Purposes and Sustainable Development). It is however recognised that existing businesses should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established²⁶¹.

MINERAL EXTRACTION AND WASTE DISPOSAL

- 6.174. Mineral extraction and waste disposal if not managed acceptably, have the potential to result in significant environmental impacts including the creation of pollution both directly and indirectly through the generation of traffic. Most mineral extraction applications will need to be accompanied by a formal environment statement to ensure that impacts arising from extraction including any pollution of the air, water or soil will be kept to an acceptable level compatible with its location within a National Park (CE-S8 Small Scale Working or Re-working for Building and Roofing Stone and CC-S4 Waste Management).

CONSIDERATIONS FOR PROPOSALS

- 6.175. When considering the impact of a development, the various forms of potential pollution including air, soil, water, noise and light, from both individual and cumulative sources will be considered. Applicants are encouraged to discuss proposals with the National Park Authority at an early pre-application stage where pollution issues are likely to arise so that relevant issues and information which may be required to accompany a proposal will be considered. The Environment Agency provides guidance on pollution prevention measures and is a key stakeholder in assessing the potential pollution implications of proposals. Further information on the impact of pollution on Natura 2000 sites is provided by the Exmoor National Park Habitat Regulations Assessment²⁶². The careful siting, layout, design and choice of materials can help to minimise energy loss and thus carbon emissions as well as other environmental pollutants and help to conserve natural resources such as water. Such design considerations

²⁵⁷ Exmoor National Park (2009) dark Sky Reserve Application to the International Dark Sky Association - In 2011 Exmoor became the second place in the world to receive ‘Dark Sky reserve’ status, in recognition of the lack of light pollution and importance of the area for views of the night sky. The reduction of light pollution was also supported by consultation

²⁵⁸ English National Parks and the Broads (2010) UK Government Vision and Circular; Exmoor National Park Partnership Plan 2012-2017

²⁵⁹ NPPF 2012 DCLG

²⁶⁰ Exmoor National Park Authority (2011) Lighting Management Plan

²⁶¹ NPPF 2012 DCLG

²⁶² Exmoor (2011) Core Strategy and Development Management Policies: Habitats Regulations Assessment Scoping Report

should also be in conformity with other design principles to ensure that they are compatible with National Park purposes (CE-S7 Design & Sustainable Construction Principles; SE-S4 Agricultural and Forestry Development).

- 6.176. The National Park Authority will require sufficient information on environmental impacts to enable planning applications to be determined. Where insufficient information is available for potentially high-risk developments, permission is likely to be refused. Development may provide an important opportunity for improving pollution levels and alleviating contaminated land. Proposals which seek to reduce pollution levels in Exmoor and are compatible with the National Park purposes and special qualities are encouraged, for example, through sustainable travel plans, carbon reduction or mitigation e.g. renewable technologies (AC-S1 Sustainable Transport; CC-S1 Climate Change Mitigation & Adaptation; CC-S3 Low Carbon and Renewable Energy Development; CC-D4 Small-Scale Wind Turbines; CC-D5 Freestanding Solar Arrays).
- 6.177. All proposals should avoid pollution where possible by using preventative measures, minimising any residual impacts, storing materials appropriately and remediating contaminated land where required before development proceeds.

CC-S5 POLLUTION

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

7. ACHIEVING A THRIVING COMMUNITY

HOUSING

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

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

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

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

PURPOSE OF THE POLICIES

7.1 The housing policies in this section aim to provide the framework to address the housing needs of the National Park's local communities and so that the level of housing development is compatible with the conservation and enhancement of Exmoor. The focus is therefore on addressing the needs of those people who live and work in the area, prioritising the need for affordable housing and ensuring that the National Park's housing stock as a whole meets the needs of all sections of the local community by providing a range of accommodation types and sizes and thereby a better mix of houses to help create more balanced, living and working communities.

NATIONAL POLICY CONTEXT

7.2 National Planning Policy is that National Parks have the highest status of protection in relation to landscape and scenic beauty.²⁶³ Broadly in relation to housing, the National Planning Policy Framework (NPPF) encourages the appropriate conversion of buildings in both urban and rural areas for residential and business use but leaves the process for achieving this to local planning authorities.

7.3 The NPPF sets out guidance for the delivery of housing in rural areas and states that local planning authorities should be responsive to local circumstances and plan for housing development to reflect local needs, particularly for affordable housing, including through exception sites where appropriate. Local planning authorities should, in particular, consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs.²⁶⁴

7.4 The National Parks Vision and Circular supports the delivery of affordable housing. In National Parks it wishes to foster healthy, prosperous, and involved local communities living within environmental limits in landscapes notable for their natural beauty; understands the importance of focussing on the local need for affordable housing as part of sustainable local rural communities and economies; and recognises that National Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them. Authorities should include policies that pro-actively respond to local housing needs. It considers the delivery of statutory National Park purposes as being the National Park Authorities' primary role.²⁶⁵

²⁶³ CLG National Planning Policy Framework (London, 2012) para.115.

²⁶⁴ Ibid. Para 54

²⁶⁵ DEFRA, English National Parks and the Broads UK Government Vision and Circular (London, 2010). Para. 78

CONTEXT

PAST APPROACHES TO HOUSING PROVISION IN EXMOOR NATIONAL PARK

- 7.5 It has consistently been recognised that National Parks are not suitable locations for unrestricted housing development. Previous regional plans focused on the need for affordable housing in rural areas to meet the needs of local communities as well as making the most of the existing stock including purchasing open market dwellings in smaller communities and where it would otherwise be difficult to deliver affordable housing.²⁶⁶ The draft South West Regional Spatial Strategy (RSS) accepted that in the region's National Parks, there should be an estimated provision against local needs only and the totals for West Somerset and North Devon therefore excluded the area covered by Exmoor National Park.²⁶⁷ By setting out an estimate of provision, the Plan enshrined a needs led approach to ensure that housing would only be provided where need was demonstrated and where it did not otherwise conflict with Park purposes.
- 7.6 Historical rates of new house building/conversions within the National Park had proceeded at a relatively high level with new housing consistently exceeding Structure Plan housing provision figures prior to the adoption of the 1997 Local Plan. Indeed, the National Park housing provision figure 1991 to 2011 had already been considerably exceeded by 2003.²⁶⁸ Permitting such development rates within the National Park had very little impact in helping provide housing to satisfy local needs and house prices continued to increase. The strategic approach to housing in the Joint Structure Plan, which applied to the whole of the National Park including that part in North Devon, was therefore to help meet local needs for housing.²⁶⁹
- 7.7 The 2005 Local Plan continued the approach of the previous 1997 Local Plan²⁷⁰ that new build housing in the majority of National Park settlements should be for affordable need.²⁷¹ The 2005 Plan marked an important change in direction in requiring that housing be for an identified need for *local* communities addressed through a needs led 'exceptions' approach that provided, exceptionally, for new affordable housing to meet a local need only where new housing would not normally be allowed to ensure that the level of housing development was compatible with the conservation and enhancement of Exmoor. This, together with maximum use of existing accommodation and buildings to reduce the need for new greenfield development, was an important principle underpinning the approach.
- 7.8 In the period 2003/04 to 2004/05, before adoption of the 2005 Local Plan, all new houses built in the National Park were open market (34). The 2005 Local Plan sought to restrict opportunities for the development of open market housing and prioritised local needs. Although open market houses continued to be built, (including as a result of the lag between granting of planning consent and completion of dwellings or housing permitted through subdivisions/conversions in line with policy), completions of affordable local need homes began to rise and open market dwellings began to fall. In the period 2005/06 to 2011/12, the number of affordable housing units permitted rose to 84. Overall, at March 2013, 63 local need affordable homes had been completed with 29 under construction and a further 11 permitted with building not yet started. In 2011/12, the number of new affordable homes completed in the National Park outstripped the number of open market homes for the first time showing that the policies were having the intended effect (see Figure 7.1).
- 7.9 Applying the 'exceptions' approach - that local need affordable housing may be permitted, where new housing would not normally be allowed, has the effect of reducing the value of land and buildings to a more reasonable level so that local communities and housing providers can acquire sites and buildings for affordable housing. This policy approach together with close working with housing authorities and providers, the Rural Housing Enabler, local communities and landowners, as well as the availability of public housing grant have enabled provision of a significant number of affordable homes in the National Park.

²⁶⁶ GOSW, Regional Planning Guidance for the South West (RPG10) (DTLR, 2001) Para. 7.15 and Policy HO3.

²⁶⁷ South West Regional Assembly, Draft Regional Spatial Strategy for the South West 2006-26 (2006), Para 4.5.3.

²⁶⁸ Exmoor National Park Authority, Exmoor National Park Local Plan 2001-11 (2005) p65.

²⁶⁹ Somerset County Council and Exmoor National Park Authority, Somerset and Exmoor National Park Joint Structure Plan Review 1991-2011 (2000). Policy 33: Provision for Housing.

²⁷⁰ Exmoor National Park Authority, Exmoor National Park Local Plan 1991-2001 (1997).

²⁷¹ Exmoor National Park Authority, Exmoor National Park Local Plan 2001-2011, (2005)

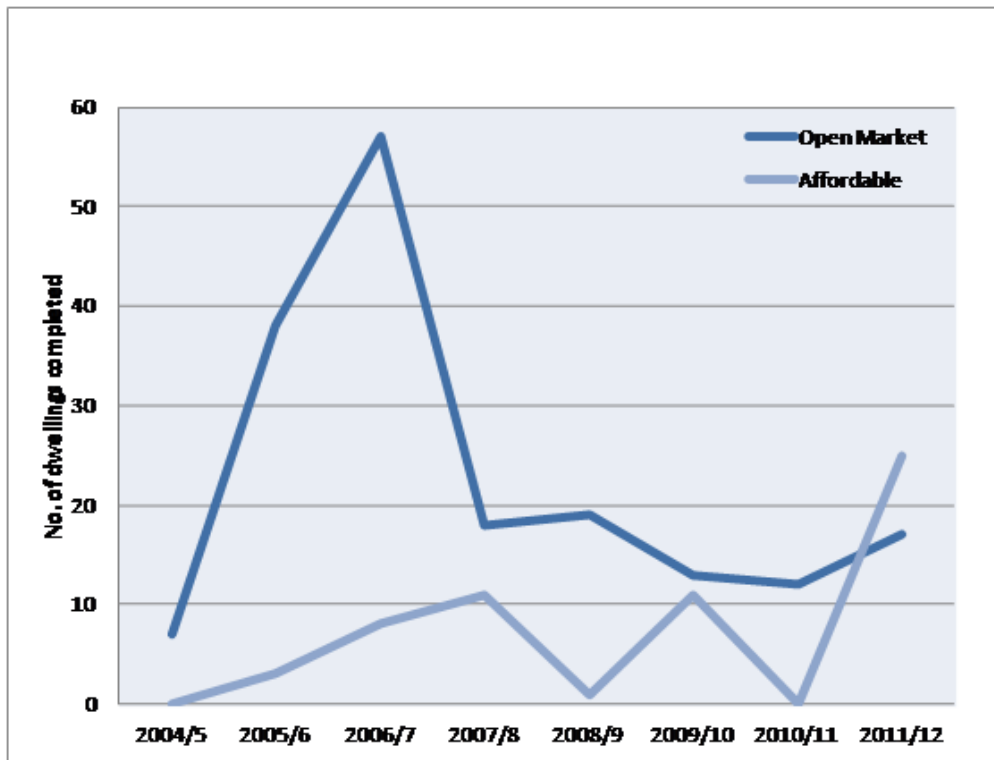


Figure 7.1 Housing Completions 2004-2012: Breakdown of Open Market and Affordable Dwellings

7.10 Analysis of the existing housing stock shows that there is a predominance of larger, detached homes (47%) and fewer more modest (and more affordable) terraces and flats (27%).²⁷² Sustainable communities require that the National Park's housing stock as a whole provides a range of accommodation sizes, types and tenures to meet the needs of all sections of the local community. The policies therefore seek to ensure that, in terms of size, type and affordability, new housing will result in a better mix of dwellings and meet a local community need. The approach is intended to give those in housing need, including local young people, the opportunity to stay in their community and help maintain the viability of important services such as schools thereby creating more balanced, living and working communities. The Landscape Sensitivity Study demonstrates how few greenfield housing sites there are in the National Park's settlements.²⁷³ In addressing local housing needs, maximum use should therefore be made of the existing stock of accommodation, buildings and previously developed land/buildings. This should help to minimise the level of greenfield housing development within the National Park and ensure that, in the longer term beyond the period of this plan, there will still be some suitable housing sites in settlements to help meet the needs of National Park communities.

EXMOOR NATIONAL PARKS POPULATION, HOUSING STOCK AND HOUSING MARKET

7.11 Arriving at consistent figures for the National Park's population and housing market is not straightforward because of the mix of data which is often collected for a district council area as a whole rather than specifically for the National Park. Population and housing data for Exmoor National Park below therefore draws on a range of evidence including the 2008 Northern Peninsula Strategic Housing Market Area Assessment (SHMA) which includes the whole National Park area as well as the updates for North Devon and Torridge and ENP in West Somerset SHMA Updates. Evidence drawn from the 2008 SHMA may be replaced by more up to date SHMA information as appropriate.

- a) Exmoor's population has experienced a decline of 5.5% from 10,873 in 2001 to 10,273 in 2011.²⁷⁴
- b) Comparison with the UK as a whole, indicates the extent to which Exmoor's population profile is skewed towards older age groups with a below average proportion of its

²⁷² Office for National Statistics 2011 Census.

²⁷³ Exmoor National Park Authority, Exmoor National Park Landscape Sensitivity Study (2012) (capacity for 333 units).

²⁷⁴ Office for National Statistics, 2011 Census.

population in each age group, except for the over 60s. It appears that there may be variations in different parts of the National Park.²⁷⁵ Those over 60 account for a substantial proportion of the overall number of in-migrants into the National Park. West Somerset district has the highest mean and median ages in England and Wales.²⁷⁶ The area of Exmoor National Park in West Somerset has an even greater concentration of older people than the district as a whole.²⁷⁷

- c) Nearly one third of people in the North Devon part of the National Park were aged 45 to 64.²⁷⁸ The National Park has a very low proportion of adults between 20 and 44 years of age. Particularly when compared to the relative scale of other age groups, this points towards the out-migration of younger adults and affects the number of children born, further exacerbating the overall trend towards a more elderly population.²⁷⁹
- 7.12 In terms of household makeup, more than one third of households in the National Park within West Somerset consisted of over 65s (35%), much higher than in the South West (24%) or nationally (21%) and West Somerset ranked 3rd of the local authorities in England and Wales for single households over 65 with 19% of this type while the National Park within West Somerset had an even higher level (20%). This compares to 14% in the South West and 12% nationally.²⁸⁰
- 7.13 In the North Devon ENP area, just over one fifth of households were single person households.²⁸¹ Projections for the area of the National Park within West Somerset 2011 to 2031 identify a dramatic growth in single person households of almost 50% and reduction in family households with the exception of lone parent families/couples with one child.²⁸² West Somerset ranked 5th of the local authorities in England and Wales for one family households with all people aged over 65 (14.6%). This compares with 10.1% in the South West and 8.1% nationally. A relatively high number of households consist of couples with no children (18.3%) compared to 14.1% in the south west and 12.3% nationally.²⁸³
- 7.14 For the period 2016 to 2021, a decline of the population in West Somerset district as a whole (including outside the National Park) is predicted of 100 people. Although the distribution of changes in the proportions of different age groups is not identified, it is clear that there are concentrations of older people within the National Park and potentially increased concentrations of older people in deeper rural locations.²⁸⁴
- 7.15 Evidence indicates that in that part of the National Park in West Somerset, increases in the proportion of those people aged over 65 are predicted between 2011 and 2035 (with declines in those aged between 35 and 64).²⁸⁵ Projections for Exmoor's population 2010 to 2031 based on the 2001 census suggested that the proportion of Exmoor's older population is likely to increase with hypothetical scenarios indicating that the proportion of over 65s could rise from 31% to between 41% and more than 50%.²⁸⁶ Internal migration is the most significant component of projected population change for West Somerset District as a whole with projections for a net increase of 6,800 people between 2012 and 2031. This contrasts with a net loss due to natural change of 4,100 people.²⁸⁷
- 7.16 Overall, however, evidence indicates that the age imbalance is likely to become more acute as those in older age groups and retired people continue to move into the area, older people become more aged and at the same time, younger people of working age leave the National Park. Continuing to address local needs for affordable housing remains an urgent task to achieve balanced and sustainable communities on Exmoor.

²⁷⁵ Housing Vision, Strategic Housing Market Assessment Update: Torridge and North Devon (2012). 'Exmoor & Downland Fringe & Exmoor National Park Sub Market Area' includes areas outside the National Park. Nearly 1/5 were 65 or over and nearly ¼ pensioner households.

²⁷⁶ Ibid in Housing Vision, Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset (2013).

²⁷⁷ Ibid, para. 2.60

²⁷⁸ Housing Vision, Strategic Housing Market Assessment Update: Torridge and North Devon (2012) Para. 5.29 (Figures for 'Exmoor & Downland Fringe & Exmoor National Park Sub Market Area' - includes areas outside the National Park).

²⁷⁹ Nathaniel Lichfield and Partners, Assessment of Housing and Affordable Housing Needs (2012)

²⁸⁰ Housing Vision, Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset (2013).

²⁸¹ Housing Vision, Strategic Housing Market Assessment Update: Torridge and North Devon (2012). For the 'Exmoor & Downland Fringe & Exmoor National Park Sub Market Area' - includes areas outside the National Park para 5.29

²⁸² Housing Vision, Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset (2013), para 2.41.

²⁸³ Ibid, para after Table 2.2.

²⁸⁴ Ibid, para. 2.33

²⁸⁵ Ibid, para 2.34.

²⁸⁶ Nathaniel Lichfield and Partners, Assessment of Housing and Affordable Housing Needs (2012) paras. 4.24 and 4.19

²⁸⁷ Housing Vision, Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset (2013).

HOUSING STOCK

- 7.17 The majority of houses within Exmoor date from before 1919 and new build dwellings account for only a small proportion of the total stock. Nearly 90% of the total stock are houses of which nearly half are detached. There is a lower proportion of terraced housing and purpose built flats which tend to be more affordable.²⁸⁸ In the National Park and surrounding districts there are fewer one and two bedroom dwellings than average and a well above average proportion of larger bedroom homes.²⁸⁹
- 7.18 Between 1992 and 2000 most dwellings approved and built in the National Park were larger, generally three bedroom houses.²⁹⁰ Since 2005, new homes have tended to be a mix of more modest houses and flats. Analysis of 69 of the new local need affordable dwellings completed in the National Park by September 2013 shows that eight were flats and the remainder houses.
- 7.19 Two thirds of Exmoor's housing is owned, about one third is rented. About 20% is in the private rented sector much of it for holiday letting purposes.²⁹¹ **19%** of all housing stock in Exmoor is second /holiday or empty homes.²⁹² This adds pressure to the limited housing stock and serves to further exacerbate issues regarding affordability and the ability (or otherwise) to satisfy the needs of local communities. The proportion of the housing stock in shared ownership or social rented tenures (i.e. affordable housing) is below the regional and national average. Less than 10% of housing in the area of the National Park in North Devon was social housing.²⁹³
- 7.20 Between 1981, when 'Right to Buy' of Council properties was introduced, and preparation of the previous Local Plan, approximately a quarter of such homes in the National Park had been sold (138 properties) and about eight properties continued to be sold each year. Between 2000 and 2009, approximately 14 further affordable dwellings were sold in the National Park.²⁹⁴ As a designated 'rural area', all new Registered Provider properties provided within the National Park after April 1996 are excluded from 'Right-to-Buy'. However, the number of new affordable housing units lost within the National Park had, until recently, not fully replaced those as a consequence of Right-to-Buy. Recent changes, introduced nationally, have enabled Registered Providers to sell some existing affordable homes to the open market, including within the National Park, in order to help fund new schemes. This does not apply to local need affordable homes subject to a local needs tie. A number of homes have been sold within the National Park through this route to fund new schemes which, to date, have all been outside the National Park. In the National Park, suitable housing sites are few and finite and the delivery of new schemes is complex. The sale of existing affordable homes to the open market results in a reduction in affordable housing available to those in housing need in the National Park. The NPA, through close working with partners will seek the retention of the existing stock of affordable housing in the National Park for the longer term.

HOUSING MARKET

- 7.21 Evidence shows that Exmoor's housing market has long been under considerable pressure from externally derived demands.²⁹⁵ The high quality environment of the National Park makes it an attractive place for people to retire to or own a second home. Demand is also high from people who work in neighbouring areas and who can afford to buy a house on Exmoor and commute out to work.²⁹⁶ The Strategic Housing Market Area Assessment provides evidence on the extent to which the area, including the National Park, is under pressure from those wishing to move from the South East, London, East Anglia and the Midlands.²⁹⁷ Evidence was gathered on the occupancy of open market houses permitted in line with planning policies from earlier Area Local Plans and the first Park-wide Local Plan, to inform the preparation of the 2005 Local

²⁸⁸ Housing Vision, Northern Peninsula Strategic Housing Market Area Assessment (2008). 2001 data, Table 30.

²⁸⁹ Ibid, ES4.1

²⁹⁰ Exmoor National Park Residential Occupancy Survey (2000)

²⁹¹ Office for National Statistics 2011 Census.

²⁹² Ibid, percentage of households with no usual residents

²⁹³ Housing Vision, Strategic Housing Market Assessment Update: Torridge and North Devon (2012). For the 'Exmoor & Downland Fringe & Exmoor National Park Sub Market Area' - includes areas outside the National Park Para 5.30

²⁹⁴ Figures supplied by Magna West Somerset and North Devon Homes Housing Associations to whom West Somerset and North Devon local authority housing stock was transferred.

²⁹⁵ Housing Vision, Northern Peninsula Strategic Housing Market Area Assessment. (2008) and Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset (2013) para. 69.

²⁹⁶ Housing Vision Northern Peninsula SHMA (2008) and Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset (2013).

²⁹⁷ Housing Vision Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset (2013), para 2.50 & Table 2.23

Plan.²⁹⁸ It showed that 30% of new properties were occupied by retired people (77% of whom came from the south east region and elsewhere in the UK) and 23% as second or holiday homes. Of all the fully occupied properties (i.e. excluding the 23% second/holiday homes) only one in every 10 went to people from National Park communities and only one in five of the smaller one and two bedroom properties, which because of their size had a lower value, went to local people.²⁹⁹ Evidence shows that between 2008 and 2011, the age group moving in greatest numbers to the area was the 45 to 64 range while those in younger 16-24 and 25 to 44 age groups left the area together with some in the 65 plus age group.³⁰⁰

- 7.22 The 69 completed local need affordable dwellings in Tables 7.1 and 7.2 have tended to be more modest in size than those provided under previous plans with the majority having two bedrooms though both larger and smaller dwellings have been permitted where there is evidence of need. Table 7.1 relates to analysis carried out of new local need affordable dwellings in 2012 while Table 7.2 is analysis of those dwellings completed subsequently to September 2013. It shows that a targeted approach of providing for local needs affordable housing has resulted in occupancy by households with a high proportion of children, young people and working age adults the reverse of the age profile for those older households who tend to move to open market homes in the National Park. Provision of local need housing provides an opportunity for those with a local connection who cannot afford to buy open market housing, including younger/working age people and families, to remain living in the National Park helping to achieve a more balanced community.

Age Range of Occupants of Local Need Affordable Housing (at January 2012)	Number of Occupants
0-9	25
10-19	10
20-29	36
30-39	22
40-49	8
50-59	4
60-69	4
70-79	2
80+	1
Age not known	4
Total Number Housed	116

Table 7.1 Age Range of Occupants of Local Needs Affordable Homes in Exmoor National Park³⁰¹

Age Range of Occupants of Additional 26 Local Need Affordable Homes (at September 2013)	Number of Occupants
0-9	22
10-19	10
20-29	20
30-39	12
40-49	7
50-59	4
60-69	4
70-79	0
80+	0
Age not known	0
Total Number Housed	79

Table 7.2 Age Range of Occupants of Local Needs Affordable Homes in Exmoor National Park³⁰²

²⁹⁸ Exmoor National Park Authority, Exmoor National Park Area Local Plans 1984-85 and Exmoor National Park Local Plan 1991-2001. Adopted 1997.

²⁹⁹ Exmoor National Park Authority Residential Occupancy Survey (2000)

³⁰⁰ Housing Vision, Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset (2013).page 77.

³⁰¹ Exmoor National Park, West Somerset and North Devon Rural Housing Project. Age Range of Occupiers of Local Need Affordable Housing in Exmoor National Park. (based on age provided at time of initial occupation and projected forward)

HOUSE PRICES AND AFFORDABILITY

7.23 The average house price on Exmoor in 2012 was £349,500³⁰³. This is 74% higher than the South West and 65% higher than England and Wales. In the North Devon part of the National Park, average house prices were more than one fifth higher than in North Devon overall in the 3 years to 2012.³⁰⁴ Since 1998 average house prices have risen by over 300% in the National Park due to the very high external market demand.³⁰⁵ The average price of more recent houses built or converted between 1980 and 2000 was £425,000 while the average of the most recent open market dwellings was £445,000. The price of smaller properties is also high with the average asking price of lower quartile (or the bottom 25%) of houses being £172,950.³⁰⁶ The ratio of average house price to average household income was 14:1 in 2012 and average lower quartile house price to average lower quartile household income was 11:1. Consequently, the majority of properties is well beyond the means of many local people in housing need, especially first-time buyers and families needing larger accommodation.

RENTAL LEVELS AND AFFORDABILITY

- 7.24 Evidence shows that private market rents in Exmoor are beyond the reach of many households on an average income (£28,000) and for all those on a lower quartile income (£16,000) based on 25% of gross income being spent on rent as a proxy for affordability. This is particularly the case for those families requiring a larger (3-4 bed) property.³⁰⁷
- 7.25 Social rental levels in Exmoor are affordable to households on average income but for those households on lower quartile incomes, they are affordable only for one and two bed housing, borderline for three bedroom properties and unaffordable for housing with four bedrooms.
- 7.26 National changes to offset reductions in public housing grants have introduced 'Affordable Rents', pegged at up to 80% of local open market rents which can be charged by Registered Providers (RPs) for provision of affordable homes. Analysis indicates that, for those on average income, they are affordable for properties with up to three bedrooms and unaffordable for four bedroom housing. However, for those on lower quartile incomes, rents are borderline affordable for one bedroom properties and unaffordable for anything larger.³⁰⁸ On Exmoor, it appears that 'Affordable Rents' are higher (and therefore less affordable) than social rents.
- 7.27 Evidence also indicates that households on benefits are able to afford only the lowest rental values. Overall, evidence indicates that changes to rent levels and to housing benefit mean that the affordability situation is likely to be worsened.

LANDSCAPE SENSITIVITY, SUPPLY OF SITES AND HOUSING DESIGN

7.28 Severe physical constraints such as flood risk and topography, together with evidence on the sensitivity of Exmoor's landscape affect the capacity of Exmoor's settlements to absorb more housing development.³⁰⁹ There are few brownfield sites suitable for new housing within the National Park.³¹⁰ If the few remaining suitable housing sites and traditional buildings within Exmoor's settlements are not used to provide local needs housing then it will put pressure on other sites outside settlements that have the potential to harm the landscape. The approach of providing housing to meet local needs through the Local Plan has to be based upon the 'exceptions' approach - to grant planning permission where general open market housing would not be permitted. Sites will not be allocated, instead they will be released on an individual basis, based upon the needs evidence provided by the applicant/developer.

³⁰² Exmoor National Park, West Somerset and North Devon Rural Housing Project. Age Range of Occupiers of Local Need Affordable Housing in Exmoor National Park. (based on age provided at time of initial occupation and projected forward)

³⁰³ Exmoor National Park Authority, Annual House Price Survey 2012. Median average House Price.

³⁰⁴ Housing Vision, Strategic Housing Market Assessment Update: Torridge and North Devon (2012). For the 'Exmoor & Downland Fringe & Exmoor National Park Sub Market Area' - includes areas outside the National Park Para 5.30.

³⁰⁵ Exmoor National Park Authority House Price Survey (2012), Table 1. 305% is the mean average figure. Surveys carried out since 1998. For those since 2004: <http://www.exmoor-nationalpark.gov.uk/planning/planning-policy/local-development-framework/ldf-evidence-base>.

³⁰⁶ Ibid, median average figure.

³⁰⁷ Nathaniel Lichfield and Partners, Assessment of Housing and Affordable Housing Needs (2012), section 2.

³⁰⁸ Nathaniel Lichfield and Partners, Assessment of Housing and Affordable Housing Needs (2012), Table 2.3 and paras 2.30-2.31

³⁰⁹ Exmoor National Park Authority, Exmoor National Park Landscape Sensitivity Study (2012) (capacity for 333 units).

³¹⁰ National Land Use Database Surveys.

- 7.29 Exmoor’s settlements have continually changed and developed. One can distinguish features of Exmoor’s building character that reinforce a sense of place. This, however, differs from settlement to settlement across the Moor. Local design features should be reflected in new development. Consistent with Partnership and Local Plan objectives the design and layout of all new housing should reinforce the identity and distinctive character of Exmoor and sustain or enhance the character of the built environment and cultural heritage of Exmoor. Housing development (including through change of use applications) should respect the character of its setting - reinforcing the identity and pattern of each settlement. Its built tradition, existing buildings, distinctive vernacular architecture, design and materials should be the starting point when designing any new housing in the National Park. Development should accord with Policy CE-S7: Design and Sustainable Construction Principles.

LOCAL HOUSING NEEDS

ASSESSING THE OVERALL NEED FOR AFFORDABLE HOUSING IN THE NATIONAL PARK

- 7.30 Feedback from the community ‘Your Future Exmoor’ events demonstrated widespread support for housing that is affordable to local people.³¹¹ Assessing the precise numbers of households in need of housing in remote rural areas like Exmoor can be complex because of the range of data that is available. Housing Authority waiting lists have been replaced with a housing register and a system which requires households to bid for affordable housing as it becomes available. The registers either do not record local connection or it may be defined differently from planning policies. As with the former Council waiting lists, it also appears that there remains an issue with rural households registering on the system and that households in need are not included in the figures.
- 7.31 The Northern Peninsula Strategic Housing Market Assessment, which included the Exmoor National Park area, was prepared in partnership with the other local authorities within the same housing market area (North Cornwall, Torridge, North Devon and West Somerset) and published in December 2008. Exmoor National Park is identified as lying within the ‘Exmoor and Downland Fringe and Exmoor National Park’ Sub-Market Area. As a result of the need to take account of the changed economic and market conditions since the preparation of the original assessment, an update of the 2008 SHMA relating to North Devon and Torridge was completed in 2012. Cornwall Council is carrying out an update to include North Cornwall. West Somerset and ENP Updates, based on the same methodology, were completed in 2013. Together, the original assessment and more recent updates provide evidence for the whole of the National Park and enable planning for the delivery of housing to meet the existing and future needs in the Housing Market Area over the plan period.
- 7.32 The North Devon and Torridge SHMA Update identified the future population-led housing needs for the whole of North Devon district, including the part within Exmoor National Park. The 2012 Localism Act brought in a duty for public bodies to co-operate on strategic cross-boundary issues. In considering the evidence for the area and co-operating with North Devon Council, there is agreement that the delivery of housing supply identified through the North Devon and Torridge SHMA update and pertaining to North Devon will be met in the North Devon area outside the National Park. This is in recognition of the fact that the NPPF states that local planning authorities should work together to meet their development needs which cannot be met within their own areas.³¹² North Devon Council recognises that opportunities to deliver open market and affordable housing within Exmoor National Park are limited due to the National Park’s statutory purposes and duty and consequently, that it is a responsibility of North Devon Council to co-operate with the National Park Authority to help meet its strategic housing needs relating to the North Devon part of the National Park outside the National Park’s boundary. The housing figure for North Devon outside the National Park takes this into account. The SHMA Update calculated that the projected housing requirement for the Exmoor and Downland Fringe and Exmoor National Park, within North Devon for the period 2011-2031, which includes areas and settlements such as North Molton and Bratton Fleming outside the National Park, is 612 of which 372 are affordable /intermediate and 276 older households (market and affordable). The identified need for 6,656 dwellings within the whole of North Devon includes future population-

³¹¹ Exmoor National Park Authority ‘Your Future Exmoor’ Feedback Reports (2010). <http://www.exmoor-nationalpark.gov.uk/planning/planning-policy/local-development-framework/your-future-exmoor>

³¹² CLG National Planning Policy Framework (London, 2012), Para. 179.

led housing needs arising from that part of Exmoor National Park in North Devon district with all of this housing to be delivered outside the National Park boundary.



Map 7.1 Housing Sub-Market Areas Across Northern Devon

- 7.33 In co-operating with the National Park Authority to meet its needs, North Devon Council has taken the view that the additional housing should be located close to and accessible to the National Park's boundaries and that community aspirations for growth identified by Ilfracombe and South Molton complement this objective. The figure for the Exmoor and Downland Fringe and Exmoor National Park within North Devon includes needs arising in centres outside the National Park such as North Molton and Bratton Fleming and a role for local centres adjoining Exmoor National Park (including Bratton Fleming, Combe Martin and North Molton) is also foreseen to help meet the National Park's future housing needs.
- 7.34 The ENP in West Somerset SHMA Update calculated that the need for affordable housing, based on households in priority housing need at September 2013 in that part of the National Park in West Somerset is 87 units.³¹³ The projected net locally arising affordable housing requirement is 427 affordable homes for the period 2011-2031.
- 7.35 The National Park Authority, through being based on Exmoor, working at a local level and in close partnership with others, including the District Housing Authorities and other housing partners, has a good understanding of the needs of the area and has hosted the Rural Housing Project (RHP) since 2002. The Project carries out Parish Housing Needs Surveys for the rural parishes within West Somerset and North Devon, including within Exmoor National Park, to assess local needs including numbers, size, type and tenure and to help develop affordable housing on Exmoor and in the rural areas of North Devon and West Somerset.³¹⁴ Given the complexities of assessing housing need in remote rural areas like Exmoor, the RHP parish surveys are important in providing up to date and detailed estimates of local housing need. These surveys consistently reveal that there is a local need, albeit often small, in some cases fewer than three households, for affordable housing in settlements.
- 7.36 It is helpful in building up a picture of local affordable need to examine the survey information that is available. The data collected by the Rural Housing Project on local affordable need and based on the local connection criteria in the Local Plan adopted in 2005 has informed the needs led approach which has delivered local needs affordable housing. Surveys carried out between

³¹³ Housing Vision Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset (2013).

³¹⁴ <http://www.exmoor-nationalpark.gov.uk/communities/affordable-housing>

2002 and 2008 identified 262 households in affordable need in the parishes within and split by the National Park boundary. In addition, a Parkwide survey, conducted by the RHP in 2008 to provide a 'snapshot' estimate of housing need, identified 194 households in affordable need of which 127 were assessed as meeting local connection criteria. Since 2008, 96 households in affordable need have been identified through the work of the Rural Housing Project in 12 parishes within and partly within the National Park. These may, in some cases, include households already identified through previous surveys. Based on analysis of the data and completions of affordable housing, the Rural Housing Project's estimate of housing need for the whole of Exmoor National Park at September 2013 is 90 units.³¹⁵ This figure is additional to the figure to be delivered in North Devon outside the National Park (paragraph 7.32 above). The reduction from 127 households in 2008 to 90 households in 2013 indicates, despite newly arising households, that the strategy, enabling the delivery of 79 local need affordable homes between 2003/04 and 2013 through the exceptions approach, has helped to address need in the National Park.

- 7.37 Although the approach to provision of housing has been widened since adoption of the 2005 Plan to provide for housing for local households (such as through 'extended family' dwellings), the priority remains the provision of affordable housing to meet local needs. New housing development in the National Park will only be permitted in accordance with the housing policies in this Local Plan.
- 7.38 The approach to housing in National Parks in the National Parks Circular is to work without a housing target (National Parks are not suitable locations for unrestricted housing and general housing targets are not provided for them). The NPPF has not altered this ability and states that local planning authorities should be responsive to local circumstances and plan for housing development to reflect local needs, particularly for affordable housing, including through exception sites. Local planning authorities should, in particular, consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs. The Plan approach is, therefore, to work with estimates of housing provision through an exceptions approach rather than a substantive target, to deliver locally needed affordable homes up to the point at which the National Park would be harmed. This is consistent with national guidance, National Park purposes, the duty to local communities and landscape capacity within the National Park and is appropriate in the context of the remote rural nature of Exmoor and small size of its settlements,
- 7.39 The current need for local need affordable dwellings for the whole National Park is 90. The projected net locally arising affordable housing requirement in the West Somerset part of the National Park is 427 affordable dwellings for the period 2011-2031 including that element in need of affordable specialist housing. Parish Surveys may ultimately show a different figure for the remaining Local Plan period up to 2030. The SHMA requirement for affordable housing in the North Devon part of the National Park will be met outside the National Park although, using the exceptions approach, local needs housing can be permitted where need can be demonstrated. These figures should not be used in determining individual planning applications as proposals for housing in the National Park will only be permitted where there is an identified local affordable and/or, in the case of 'rural worker' specialist housing, or 'extended family' dwellings', local housing need, consistent with the policies in this Local Plan. However, the estimate is considered helpful in framing the Local Plan housing strategy for the National Park to 2030. This estimate of housing need in the National Park will be monitored against the indicators set out in Appendix 3 of this Plan to assess progress on addressing the community's need for affordable housing and the landscape capacity of Exmoor's settlements to accommodate housing development.
- 7.40 It will be necessary for local housing need to continue to be monitored through the lifetime of this Plan since the housing needs of households change as circumstances change and additional need will arise as new households form. As well as new provision to address need, some identified need is likely to be met through re-lets of existing affordable housing.
- 7.41 The NPPF has changed the definition of exception sites to allow, at the local authority's discretion, for small numbers of market homes where essential to enable the delivery of significant additional local needs affordable housing.³¹⁶ In response to the current reductions in

³¹⁵ Exmoor National Park, West Somerset and North Devon Rural Housing Project: Households in Affordable Housing Need in Exmoor National Park.

³¹⁶ CLG, National Planning Policy Framework (2012), Para. 54

national affordable housing grant, the policies in this plan therefore provide for some flexibility on exception sites to consider principal residence housing where it is essential to enable delivery of affordable housing. Such housing may include specialist housing for Exmoor's communities to address the needs of older people and other vulnerable members of the community who require care and assistance. Any principal residence housing which may be permitted in accordance with policies in this plan, including to deliver local need affordable housing, as above, for the re-use of buildings as dwellings, through subdivision, 'extended family dwellings' or for rural worker dwellings for example may also indirectly contribute to the housing requirement identified for the area of the National Park in the ENP in West Somerset SHMA Update. It is inappropriate to identify a figure for such housing in a National Park. Equally, a five year housing land supply is considered to be neither appropriate nor necessary as it is inconsistent with the delivery of housing in a National Park through an exceptions approach and because the National Parks Circular is clear that National Parks are not suitable locations for unrestricted housing and general housing targets are not provided for them.

HOUSING AFFORDABILITY

Income and House Costs

7.42 Housing 'affordability' has to be considered at a local level in the context of local incomes and house prices. Average household income within the National Park was between £28,000 and £29,000 in 2007.³¹⁷ The figure for the area of the National Park in West Somerset was £29,394)³¹⁸ Many people were on lower incomes and in the area of the National Park within West Somerset, 45% of households are dependent on incomes of £20,000 or less.³¹⁹ The lower quartile average income within the National Park in 2007 was £16,000³²⁰ (£12,826 for the area of the National Park within West Somerset). This is substantially lower than the national average, reflecting the high proportion of people employed in service, tourism, farming and other land based industries. There is a very high percentage of self employment within Exmoor, as well as many seasonal and part-time jobs. 27% of West Somerset's work-force is self-employed compared with 18% and, 16% for the South West and England.³²¹ In 2012, average self-employed earnings were 14% lower than employee-employment equivalents.³²² Comparing rental levels and house prices with income levels and the availability of mortgages within the National Park demonstrates the magnitude of the problem.

Category of employee	West Somerset	South West	England
Full-time	£393.7	£473.4	£507.6
Self-employed	£338.58	£407.12	£436.54

Table 7.3: Gross Median Weekly Incomes For Residents in West Somerset, 2012³²³

³¹⁷ CACI, mean average annual gross household income for Exmoor National Park at postcode level (2007). 2009-2010 CACI Paycheck data, mid-year estimates for mean average annual gross household income was £28,668.

³¹⁸ CACI Mean Income Paycheck Data, (September 2013).

³¹⁹ Ibid, Bullet point before Fig 2.1.

³²⁰ CACI, Mean lower quartile household income at postcode level (2007).

³²¹ Housing Vision Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset (2013), Para. 2.11,

³²² Ibid, Para. 2.12

³²³ Ibid, Table 2.8. (Source: ONS Annual Survey of Hours and Earnings – resident analysis, NOMIS website, <http://www.nomisweb.co.uk/>. Contains public sector information licensed under the Open Government Licence v1.0 <http://www.nationalarchives.gov.uk/doc/open-government-licence/>.)

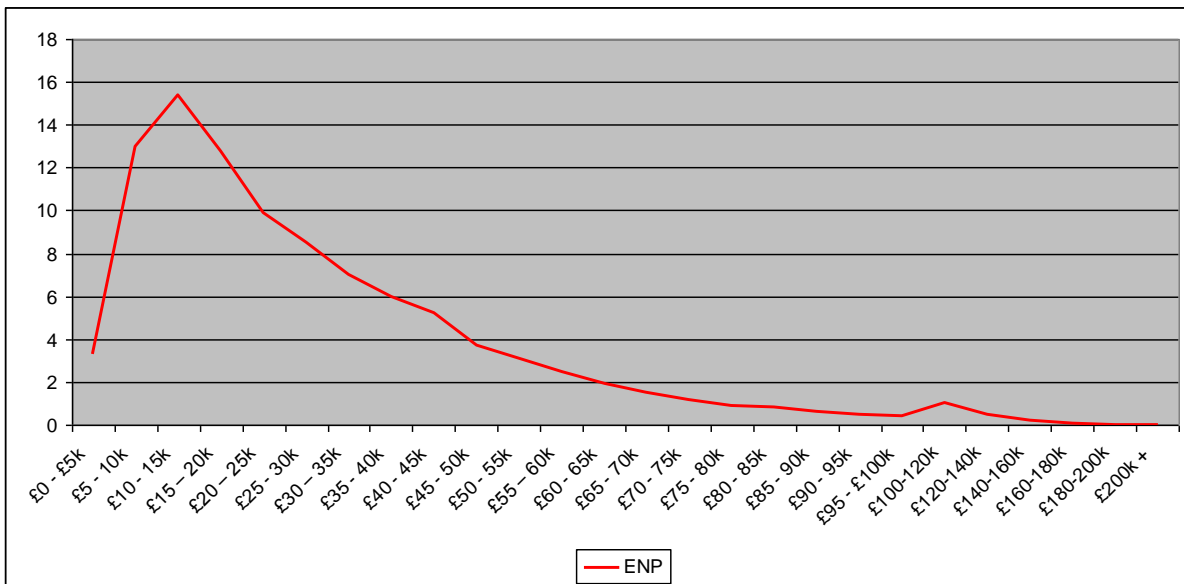


Fig 7.2: Gross Household Income, Exmoor National Park in West Somerset, Income Bands by Percentages, September 2013³²⁴

Assessing and Controlling Affordability

- 7.43 Within the terms of the local needs housing policies, affordability will have to be judged on a household-by-household basis. Those in need of affordable housing will be people/families who cannot afford to purchase a home on the open market. All types of tenure can contribute to the stock of affordable housing - housing for rent, shared equity or low-cost owner occupied properties with restrictions to ensure they remain affordable. However, because the National Park Authority cannot directly control tenure through planning conditions or agreements, each different degree of need will have to be matched to the appropriate type of property.
- 7.44 For most local households in housing need, because of their low income levels, this will have to be rented property controlled by a Registered Provider or other landlord. Evidence of income and affordable rent levels indicates that to be truly affordable, rent will need to be lower based on social rent levels.
- 7.45 Self-build is an appropriate method of achieving affordable housing. This is particularly aimed at benefiting young first time buyers to enable them to remain in their communities and, in turn, help to create a more balanced population. Experience of implementing the housing policies in the 2005 Local Plan has shown that there may be opportunities for Housing Providers to provide serviced self build plots as part of a larger scheme.
- 7.46 The NPA will work with partners to consider ways in which households can be assisted to provide homes, including site preparation and provision of services. The NPA will consider low cost shared ownership housing within the National Park where there is clear evidence of need for it although evidence indicates that, when both the rent and the mortgage element of such housing is taken into account, that this tenure may be unaffordable for all but a very few households assessed as being in housing need in the National Park.
- 7.47 Taking account of the significant gap between open market private rents and open market house prices in the National Park and many local incomes, affordability of privately rented and owner occupied dwellings will be achieved through both:- (i). The local occupancy tie, which will reduce house values and (ii). keeping the size of properties as small as possible commensurate with the needs of the intended household, but also recognising the role of the property to meet future needs of the community for affordable housing.
- 7.48 Taking account of construction costs within the National Park, individual privately or owner occupied dwellings should have a net floorspace 90 square metres or less unless it is housing controlled through a Registered Provider where the need for a larger dwelling can be demonstrated. The 'net internal floor area' is the area on one or more floors enclosed by the perimeter walls of a dwelling and is measured to the opposing unfinished faces. It includes the

³²⁴ Housing Vision Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset (2013), (Source: PayCheck Data, CACI, September 2013).

area occupied by partitions, the area taken up on each floor by any staircase, the area of any chimney breast or flue, and the area of any external WC. It excludes the floor area of any general store, dustbin store, fuel store, garage or balcony; any area in rooms with sloping ceilings to the extent that the height of the ceiling does not exceed 1.5m; and any lobby/porch open to the air.

- 7.49 The National Park Authority will consider dwellings larger than 90 square metres floorspace only where they are controlled through a Registered Provider (including owner occupied dwellings controlled through a Registered Provider), and where the identified need is for a larger dwelling. The size of the dwelling should be based on the HCA Scheme Development Standards. The National Park Authority intends to produce a supplementary planning document to provide advice on addressing the local need for affordable housing which will include floorspace guidelines. Terraced and modest semi-detached houses and flats will be expected in the majority of cases.
- 7.50 To ensure that new dwellings are affordable for local people, the cost of delivery of affordable housing, including those promoted by private developers for sale, will be closely scrutinised to ensure that the dwellings will be genuinely affordable in relation to identified needs, site development costs and local incomes/mortgage availability. This should be borne in mind by applicants and developers of new houses, so that the price they pay for the site/land, building, construction and finishing reflects its reduced market value. Applicants will be expected to provide evidence, with the application including for construction costs. An independent financial appraisal of the development, through the district valuer may be required to show that the resulting dwellings will be genuinely affordable. This is important because although the intention of the policies is to provide opportunities for people to stay in their communities, overall costs need to be realistic, given local income levels in case there is a need to sell.
- 7.51 The National Park Authority considers that, due to rapid changes in the housing market, it is challenging to establish a meaningful relationship between incomes and house prices particularly where a Registered Provider is not involved. However, by virtue of the limitations on size, type and occupancy, housing provided through the Plan policies will always remain (all other things being equal) **more affordable** than they would otherwise be. In addition to limiting size and type, the National Park Authority will require demonstration of the intent to build a house (or houses) in the affordable range. Evidence on the level of 'Affordable Rents' which can be charged by Registered Providers and which are pegged at up to 80% of open market rental levels indicates that they may not be affordable to many local households in housing need. Currently new housing schemes built by Registered Providers and which receive public housing grant through the HCA must be rented out at up to 80% of open market rental levels though even where the HCA agrees to lower rents, no extra grant will be available to the Registered Provider. Anyone building housing to rent out should also set the rent at or below the current "Affordable Rent" used by Registered Providers building in the National Park. The National Park Authority will work with applicants and seek the advice of the District Housing Authorities on a case by case basis to consider the scheme as a whole and to assess whether potential rental levels are likely to be genuinely affordable to households in local housing need. Evidence of income and affordable rent levels indicates that to be truly affordable rent is likely to be lower and based on social rent levels.
- 7.52 More affordable housing can also be kept available through the retention of the existing suitable properties within the wider housing stock. Policies provide for the subdivision of existing open market dwellings to create smaller units of accommodation. Policies will control the size of extensions, to ensure a range of dwellings, including smaller dwellings remain available, and permit the replacement of existing occupancy conditions with local occupancy ties.
- 7.53 The fundamental objective under these housing policies is to ensure that those new affordable dwellings which are permitted remain more affordable to meet the community's needs in perpetuity with new affordable, housing restricted to 90 square metres net floorspace (see paragraph 7.37 above). The size of other dwellings including 'extended family', rural land based worker dwellings, succession farming dwellings and specialist housing for older people is also limited. Permitted development rights will be removed and, where the net internal floorspace limitation will not be exceeded this will enable the National Park Authority to assess the impact of increasing the size and affordability of any extensions on these dwellings on an individual basis. Applications for extensions will be assessed against Policy HC-D13. In respect of the conversion of buildings the additional reason for withdrawing permitted development rights is to protect the character and appearance of the building.

- 7.54 The principal community identified need identified by Strategic Policy HC-S1 Housing, is housing affordable to local people in perpetuity. This will be secured through requiring applicants to enter into a legal agreement (in the form of a planning obligation under Section 106 of the Town and Country Planning Act 1990). The National Park Authority considers that obligations provide greater certainty in securing housing for local needs and ensures that in any change of occupation the new occupant is aware of the restriction.
- 7.55 Reference to 'Dwelling', 'Housing' or 'Accommodation' within the following policies includes flats and self-contained annexes.

STRATEGIC POLICY: HOUSING

- 7.56 The Strategic Policy HC-S1 carries forward the policy approach to housing in Exmoor National Park adopted since 2005: that it is not appropriate to permit new housing simply in response to the significant external demand for open market housing. Instead, within the National Park, policies provide for new housing as an exception to normal policies of restraint.
- 7.57 The limited number of opportunities for new housing development emphasises the importance of concentrating on the identified local need for affordable (including intermediate) housing within the National Park. Addressing the local need for affordable housing helps those who cannot compete in the open housing market. It is a justifiable reason for new housing provided there is no harm to the National Park and its special qualities. It can also help people who move away from the National Park (e.g. for further or higher education, early careers including service families) to return within a reasonable period and counteract, to some degree, the overall trend towards an ageing population. As a remote area with all settlements defined as rural, the use of the rural-exception sites approach for affordable housing to meet local needs is appropriate for Exmoor National Park.³²⁵ The exceptions approach does not define or allocate sites in a plan. Policy HC-S1 makes it clear that the principal community identified need is for affordable housing with local occupancy ties.
- 7.58 Policy HC-S1 also makes provision for the identified local housing needs of rural land based workers, older people and other vulnerable members of the community in need of specialist housing where adequate care and assistance cannot be provided within the existing housing stock and 'extended families'.

SIZE AND TYPE OF HOUSING AND LIFETIME HOMES

- 7.59 Based on evidence on the National Park's existing housing stock, to create more balanced communities, and address the needs of existing and future households there is a need to continue to prioritise smaller and more affordable dwellings such as terraces and flats and ensure that the tenures of new housing are aligned to identified needs. Following an exceptions site approach, the need for, mix of dwellings and viability of a proposal will be assessed on a case by case basis. The Exmoor Housing SPD provides further guidance.
- 7.60 Policy HC-S1 aims to ensure, in terms of its size, type and tenure that the mix of all housing permitted in the National Park contributes to that which is needed by Exmoor's communities. In delivering affordable homes, housing providers have to consider a variety and range of needs for different sizes, types and tenure of home (such as those for local workers, specialist housing for older people and other vulnerable members of the community and those with care needs, single people or young families). This is an important part of assessing need and, housing providers and developers of two or more affordable homes will need to show that they have taken into account the housing needs of the community. Other than where justified by conservation and enhancement, single properties will tend to be from private developers or self-builders aiming to satisfy a particular individual (though proven) need.
- 7.61 As well as affordable housing provided by housing providers, any market (principal residence) housing developments will also need to reflect the needs of the area for sizes and types of homes to help create a more balanced housing stock. Dwellings should be no larger than that needed in the area given the above average proportion of larger and detached dwellings. However, the policy requires that such housing should also meet a good standard of floorspace consistent with the Exmoor Housing SPD. This will help to avoid discrepancies between the floorspace standards required by the HCA for affordable housing and that of any principal

³²⁵ Section 17, Housing Act 1996 by SI 1997/620-25 & 1999/1307 Small rural settlements defined for enfranchisement and right to acquire purposes.

residence housing which may be permitted to deliver it. The need for specialist housing for older people and vulnerable members of the community should also be considered and proposals should accord with Policy HC-D3.

- 7.62 New housing development will be expected to meet the Lifetime Homes Standard unless the National Park Authority is satisfied that there are mitigating circumstances, including the impact of the standards on National Park objectives, which prevent all the criteria being incorporated. Improvements to existing homes will also be encouraged to meet the standard. This should improve their suitability so that as their needs change, people can remain in their own homes for longer.
- 7.63 The National Park Authority will work with the Homes and Communities Agency, housing authorities the Rural Housing Enabler, local communities and housing providers to help implement housing policies: delivering housing for the benefit of local communities and the conservation and enhancement of the National Park. Delivery will be monitored and reported on. This will enable the National Park Authority to openly review the effectiveness of policy; taking into account changing circumstances in housing finance and delivery and the capacity to accommodate development in order to secure the necessary amounts of locally needed affordable housing. It will also bring forward Supplementary Planning Documents and legal agreements to provide a comprehensive framework within which local and affordable and housing can be secured in perpetuity.
- 7.64 The special measures necessary in protected landscapes together with experience of the ways in which housing providers and others such as local housing trusts can contribute to the local need for affordable housing suggest that affordable homes do not always need to be newly built. There is potential to exercise a 'local preference' when those existing affordable homes, which are not subject to a local needs occupancy tie become available for re-letting and this approach has been applied in the area by some Registered Housing Providers. Additionally, both the number and proportion of affordable homes might sometimes be increased by buying suitable existing open market homes including creating new units through subdivision. This would be compatible with National Park purposes and landscape conservation as it would reduce the overall number of households in housing need and the number of new build homes and conversions needed. The purchase of existing properties would offer an opportunity to modernise existing housing and reduce their carbon footprints and also benefit places where there is no capacity to build new homes. Since planning permission is unlikely to be required, housing providers and authorities would exercise their own discretion about the eligibility of occupants. The National Park Authority will work with its partners to further explore the potential for approaches and the benefits that they might bring over time.

HC-S1: HOUSING

- 1. The purpose of housing development will be to address the housing needs of local communities. Provision will not be made for housing solely to meet open market demand. Housing land will not be allocated in the development plan. The principal community identified need is for affordable housing with local occupancy ties to be occupied by a person(s) with a proven housing need in accordance with the local occupancy definition in Policy HC-S3.**
- 2. Exceptionally, new housing will be acceptable where it addresses an identified local housing need for:**
 - a) affordable homes that remain affordable and which will be occupied by local persons in proven housing need in accordance with the local occupancy definition in policy HC-S3 in perpetuity;**
 - b) a proven essential need for rural workers in agriculture, forestry or other rural land based enterprises in accordance with HC-D4 or HC-D5 and HC-D6 or to enable succession farming on established farm businesses which the Authority is satisfied will contribute to meeting National Park purposes in accordance with HC-D7; or**
 - c) specialist housing for older people and other vulnerable members of the community, where adequate care or assistance cannot be provided within the existing housing stock in accordance with Policy HC-D3 and only where it will be, or will contribute to the delivery of, local need affordable housing and it will be occupied by local persons in perpetuity in accordance with Policy HC-S3, or**
 - d) an “extended family dwelling” in accordance with HC-D8 which will be occupied by local persons in perpetuity in accordance with policy HC-S3**
- 3. It is required to achieve conservation or enhancement of listed or locally listed buildings or in accordance with Policies HC-S2 and GP6**
- 4. All new residential development will contribute towards the creation of sustainable, balanced, inclusive communities by providing housing that addresses the local needs of present and future generations, through:**
 - a) having regard to the existing housing stock in the locality, ensuring that new housing provision will, through the mix of new dwellings in terms of size, type and tenure, meet the needs of Exmoor’s communities; and**
 - b) offering a good standard of accommodation by being constructed to provide a maximum and minimum internal floorspace consistent with the standards in the Exmoor Housing SPD; and**
 - c) ensuring that new residential development meets the Lifetime Homes standard.**

HOUSING CONSERVATION AND ENHANCEMENT

- 7.65 Experience of applying the adopted Local Plan policies has indicated that there may be circumstances where, occasionally, new housing through the re-use of an existing building may be the best way to achieve conservation and enhancement of a listed building in line with National Park purposes. However the principle in Exmoor remains that, wherever possible and financially viable, such developments should add to the stock of affordable housing, either on the site itself or elsewhere in the National Park.
- 7.66 Unless therefore it can be demonstrated that open-market values are required for conservation and enhancement purposes, all schemes of this type that provide new housing will have mechanisms in place to ensure that they remain affordable for local needs in-perpetuity. In some cases, where the short term need in the locality and the number of affordable homes that a viable scheme could provide is higher than is needed in the parish and its adjoining parishes, the use of a financial mechanism (or commuted sum) can be used to ensure that the potential benefit of affordable housing can be transferred to other parts of the National Park. Policy HC-

S2 sets out the principle and Policy HC-S4 sets out how it will be applied. Such benefit should be used as locally as possible. Guidance on financial contributions including the scales of off-site developer contributions is set out in the Exmoor Housing SPD. GP6 defines the nature of conservation and enhancement that might provide a justification for new housing in such circumstances. More complex schemes may allow for community infrastructure other than housing but the primary justification will still be conservation and enhancement. Policy SE-D2 (employment) makes specific provision for this only where it can be demonstrated that an employment site is no longer viable or has been replaced and needs to be comprehensively redeveloped.

HC-S2 HOUSING CONSERVATION AND ENHANCEMENT

- 1. Exceptionally, new housing will be permitted in accordance with Policies HC-S1 and GP6 where it is required in order to achieve the conservation and enhancement of a listed or locally listed building of significant historic or architectural interest and where it can be demonstrated that there are no alternative solutions to achieve the conservation of the building and it accords with Policy CE-S5.**
- 2. Any scheme proposed under Policy HC-S1 clause 3 that is able to accommodate more than one dwelling unit, must also address an identified local need and be affordable with occupation restricted to local people in perpetuity, unless it can be demonstrated that:
 - a) it is not financially viable, although the intention will still be to maximise the proportion of affordable homes within viability constraints; or**
 - b) it would provide more affordable homes than are needed in the parish and the adjoining parishes, now and in the near future.****
- 2. Proposals under Clause 2 a) above should accord with the principles set out in Clause 3 of Policy HC-D1.**
- 3. In the case of 2(b), subject to viability considerations, the affordable housing provision that the scheme could have accommodated will be provided through a linked scheme of affordable housing needed elsewhere in the National Park. Where this cannot be achieved, a financial contribution will be required towards affordable housing needed elsewhere in the National Park in accordance with Policy HC-S4.**
- 4. Alongside required conservation and enhancement gains, the National Park Authority will ensure that, whether through a single permission or incremental permissions, the number of affordable dwellings created is that which would have been required if the scheme had been constructed as a single development having regard to the planning unit and previous permissions since the adoption of the March 2005 Local Plan. In the case of the creation of more than one dwelling from a single previous planning unit (whether at once or over a period of time) the development should contribute the maximum proportion of local need affordable homes consistent with criteria 2a) and 2b) of this policy.**
- 5. Where there is reason to believe that the proposal is formulated with a view to circumventing or mitigating affordable housing requirements, including where the National Park Authority considers that a building is able to accommodate more than one dwelling unit, its capacity will be re-calculated.**

LOCAL OCCUPANCY CRITERIA

Addressing the Local Community's Housing Needs

- 7.67 In meeting National Park statutory purposes, the legal duty refers to local social or economic wellbeing. Broadly, and in the context of housing provision, 'social' relates to family and community ties established over a period of time and 'economic' to ensuring the local rural workforce has access to adequate housing. The definition of 'local' within Policy HC-S3 below incorporates both these aspects.
- 7.68 Before new affordable housing can be considered, the local community need for the new dwelling(s) (including conversions) must be established. The distinction between 'demand' and 'need' has to be recognised. For an individual household within a community, proof of need will be established through a detailed questionnaire. Community need will be proven through a local housing needs survey based on the process and survey forms established by the Rural Housing Project and carried out in association with the Town/Parish Council(s). Private surveys, without the assistance of the Rural Housing Enabler or a Registered Provider or District Council, are not acceptable. In each case the National Park Authority will carefully examine the survey results to ensure that a genuine need exists for the number, size, type and tenure of dwellings proposed.
- 7.69 In order to comply with the Local Plan strategy to minimise new build housing on greenfield land, before applying for a new dwelling or housing, an individual or group will be expected to have examined the availability of properties and existing buildings in their own and adjoining Parishes and the locality. Where existing property of a suitable price, size and type is, or is likely to become, available, including opportunities for extensions and/or subdivision to create smaller more affordable units of accommodation, new build housing is unlikely to be permitted.
- 7.70 The housing policies therefore require that applicants demonstrate that:
- a) the need cannot be met within the existing housing stock or already with planning permission including through the subdivision/appropriate extension of existing dwellings.
 - b) Where this cannot be achieved, from sites/buildings within the development boundary/well related to existing buildings
 - c) there are no suitable brownfield sites that can reasonably be developed in place of a proposal on greenfield land.
- 7.71 best use is made of land in terms of the density of development consistent with Partnership and Local Plan objectives to ensure the design of all new housing development respects the character of its setting, reinforces the identity of its settlement, the local vernacular architecture and incorporates sustainable development principles consistent with GP1 (National Park Purposes and Sustainable Development) and CE-S7 (Design and Sustainable Construction Principles).
- 7.72 In respect of site selection, justification of a local need does not, of itself, outweigh other policies of conserving the National Park, and these will have to be taken into account in judging any particular proposal. The policies within this section aim to provide most new housing in settlements. Where Parishes do not have an identified settlement (or suitable site within one), the search for a site for a local needs house(s) will be directed towards an adjoining Parish. Where Parishes are split by the National Park boundary and the settlement lies outside the National Park, the need for housing should be met in that part of the settlement lying outside the National Park and in accordance with the relevant District Council's planning policies.
- 7.73 Residential conversions within the National Park in settlements – the Local Service Centres, Villages and Rural Communities - as well as in the open countryside will be expected to contribute to the stock of local needs housing. For larger buildings, affordability will be achieved through creating more than one unit. This will need to be done sympathetically to help retain the building's original character. Conversions providing employment space alongside a dwelling(s) are also positively encouraged. Registered Providers can play a valuable role in sub-dividing existing properties within settlements to create smaller units of affordable accommodation.
- 7.74 For the purposes of the policies within this Local Plan 'local needs' housing is defined as housing which is intended to meet the needs of the local community. Local community includes those people with strong local connections with a Parish or adjoining Parish(es), defined as a minimum period of 10 years permanent and continuous residency. This includes people who previously lived within the Parish(es) and who want to return to their community. The local

occupancy definition also includes those with a ten year connection to the National Park as a whole but who do not qualify as having lived for 10 years or more in any one parish/adjointing parish. In such cases, a strong connection to a given parish will need to be demonstrated.

- 7.75 Local need includes those people with strong local connections, but who cannot afford to buy or rent existing housing in the locality. 'Locality' includes the Parish, adjoining Parishes and an area within a reasonable travelling distance of their place of work and local services.
- 7.76 The NPA will consult the District Council Housing Officer and work with the Rural Housing Enabler in order to assess applicants' ability to afford existing housing information on incomes/savings and housing need including claims of unsatisfactory conditions, such as unfit property.
- 7.77 Local people with access to existing accommodation or incomes/savings to enable them to afford to buy or rent suitable accommodation in the locality will not meet the requirements of Policies HC-S1 (Housing) or HC-S3 below. In assessing need, account will be taken of any properties owned, or previously sold or otherwise disposed of, by the intended occupants of the new accommodation to avoid any abuse of the policy. In respect of claims of a relative's care needs, medical evidence will be required.
- 7.78 The definition also includes 'Exmoor Workers' and people who need to live close to their place of work within the Parish(es). Evidence from the applicant on the security of their jobs and the value of their work to the National Park and its communities will be assessed. The National Park Authority intends to produce a supplementary planning document to provide guidance on application of this clause of the policy including what constitutes an 'Exmoor worker'.
- 7.79 All applications for new dwellings will be scrutinised thoroughly to ensure that intended occupants are both 'local' and in 'need' of such accommodation.
- 7.80 Individual applications will be assessed as part of the need of the community as a whole, in line with Government policy. This will ensure decisions are applied in a fair and consistent way, and ensure that all new housing permitted under these policies remains available to meet the needs of the local community in perpetuity.
- 7.81 The policy includes provisions or cascades in the event that a local needs affordable home becomes vacant. In the first instance only those with a local connection as set out in 1 a to e) of Policy HC-S3 will qualify. However where there are no-local persons meeting criteria 1 (a) to (e), the policy allows that local persons with a minimum period of 5 years permanent and continuous residence in that parish or an adjoining parish may qualify. Ultimately the cascade can go as far as the National Park for privately owned dwellings, or for housing owned or controlled by a Registered Provider, as far as the district council area outside the National Park. This approach provides sufficient flexibility to ensure that an occupier can be found though with a connection to the area while ensuring that private/owner occupied dwellings remain more affordable.

HC-S3 LOCAL OCCUPANCY CRITERIA

1. New housing will be in accordance with Policy HC-S1 and in the case of 2 a) will be occupied in accordance with the following local occupancy definition by a person(s) (and their dependents) with a proven housing need who meets one or more of the following:
 - a) a minimum period of 10 years permanent and continuous residence in the parish or an adjoining parish who cannot afford (to rent or buy) accommodation in the locality and is forming a household for the first time or is currently homeless or living in otherwise unsatisfactory accommodation;
 - b) a minimum period of a total of 10 years permanent residence within parishes within the National Park and who can demonstrate a clear link with a parish or its adjoining parish who cannot afford (to rent or buy) accommodation in the locality and is forming a household for the first time or is currently homeless or living in otherwise unsatisfactory accommodation;
 - c) is not now resident in the parish or an adjoining parish but with a local connection with the parish including a period of permanent and continuous residence of 10 years or more within the last 20 years and who cannot afford (to rent or buy) accommodation in the locality and has a proven need;
 - d) an essential need to live close to another person who has a minimum of 10 years permanent and continuous residence in the parish or an adjoining parish, the essential need arising from proven age or medical reasons, and who cannot afford (to rent or buy) accommodation in the locality; or
 - e) needs to live close to their place of work or meets the requirements of an Exmoor worker in the parish or an adjoining parish and who cannot afford (to rent or buy) accommodation in the locality.
2. In the case of proposals for new build housing in Rural Communities, the local occupancy definition will be as clauses 1 a), c), d), or e) above only and save that it will pertain to that parish only and will not include the adjoining parish(es). *continued...*
3. In assessing the community's need for a proposed development the extent and nature of that need will be judged by reference to an up to date local housing needs survey prepared by, or in consultation with, the district council (as local housing authority) and parish council(s).
4. In the case of proposals by an individual for a single local need dwelling the definition of local will include clauses 1 (c) and 1 (e) above only where the proposal is for the change of use of an existing building. The need for a single local need dwelling will be judged by reference to:
 - a) Evidence of the circumstances of the intended occupier in terms of:
 - i. their compliance with clauses (a) to (e) above,
 - ii. that they have searched for suitable accommodation in the locality; and
 - iii. the extent to which it forms part of a wider community need including any up to date local housing need survey as above and the likelihood of the type, size and location of the property meeting an ongoing community need for housing in the event that the individual subsequently moves out of the property..
5. In the case of dwelling(s) owned or controlled by a Registered Provider (including Housing Associations) the definition of local need shall initially be based on criteria 1 (a) to 1 (e) above. The planning obligation will allow where no-local persons meeting criteria 1 (a) to (e) above or, where properties become vacant and there no-local persons meeting criteria 1 (a) to (e) above, other local persons with a minimum period of 5 years permanent and continuous residence in the parish or an adjoining parish or with strong local ties to the relevant district council area of the National Park, the National Park as a whole and the remaining district council area outside the National Park, to occupy the dwellings.

- 6. For privately owned dwellings the definition of local need shall initially be based on criteria 1 (a) to (e) above. The occupancy cascade will not go wider than the National Park area unless for subsequent occupants or occupants of dwellings achieved through the change of use of existing buildings to local need dwellings qualifying under clauses 1 (c) and 1 (e) as above. The planning obligation will allow, where properties become vacant, other local persons with a minimum period of 5 years permanent and continuous residence in the parish or an adjoining parish or with strong local ties to the relevant district council area of the National Park, or the National Park as a whole to occupy the dwellings.**
- 7. Specialist Housing for Older People or other vulnerable members of the community will be in accordance with Policies HC-S1, HC-S2, HC-D3 and HC-D1 or HC-D2 and will be occupied in accordance with the following local occupancy definition by a person (and their dependents) who is living in unsatisfactory accommodation and who has:**
 - a) a minimum period of 10 years permanent and continuous residence in the parish or an adjoining parish; or**
 - b) a minimum period of a total of 10 years permanent residence within parishes within the National Park;**
- 8. Extended family dwellings, permitted in accordance with Policy HC-S1 and HC-D8 will be occupied by a person(s) (and their dependents) who can demonstrate that:**
 - a) the occupier of the associated existing dwelling or the new dwelling has a minimum period of 10 years or more in the last 20 years permanent and continuous residence in the parish or an adjoining parish; and**
 - b) they are immediate family by virtue of being a direct descendent or antecedent of the permanent occupier of the associated existing dwelling; or**
 - c) exceptionally, they are a dependent relative who has an essential need to live close to another person, the need arising from age, family or medical reasons.**

FINANCIAL CONTRIBUTIONS

- 7.82 Policy HC-S2 (Housing Conservation and Enhancement), HC-D1 (Conversions to Dwellings in Settlements) and RT-D3 (Safeguarding Serviced Accommodation) sets out the circumstances when a financial contribution may be sought in lieu of an actual on site contribution to affordable housing. These occasions are expected to be exceptional as the NPA will seek all new housing development to address a local affordable need and the needed affordable housing will therefore be provided on site. Where, consistent with Policy HC-S2, HC-D1 and RT-D3, and only where, exceptionally, it can be demonstrated that on site provision of affordable housing is not possible or appropriate, will alternative off-site provision in the form of a linked scheme or a financial contribution of broadly equivalent value be considered in lieu of the required affordable housing. Such circumstances will include where the scheme would provide more affordable homes than are needed in the parish and adjoining parishes. To enable scrutiny of the different elements and costs of the scheme, including site (building) values, so as to ensure that the affordable housing provision is maximised, an 'open book' approach will be required in all cases.
- 7.83 Policy HC-S4 sets out the principle of requiring a contribution including that the level of the contribution should, at minimum, be equal to if the affordable housing had been provided on site. Where a proposal is for a conversion and in accordance with Policies HC-S2, HC-D1 or RT-D3, the contribution is likely to be greater than the equivalent new build value, because conversions of existing buildings are generally more expensive to deliver than new build. The NPA will seek provision to be local to the parish where the contribution is sought wherever possible and appropriate. The Exmoor Housing SPD will set out the methodology, including assessment of viability, for financial contributions.

HC-S4 FINANCIAL CONTRIBUTIONS FOR AFFORDABLE HOUSING

Where the NPA is satisfied that a financial contribution is required in accordance with Policy HC-S2 and other policies in this plan, the financial contribution will, at minimum, be of an equivalent value to the affordable housing which would have been provided on site and in accordance with the Exmoor Housing SPD.

PRINCIPAL RESIDENCE HOUSING

7.84 Principal residence housing is a form of market housing controlled by a mechanism which ensures it can be lived in by anyone but only as their principal residence. The aim of this mechanism is to prevent any new market housing being used as a second or holiday home given the existing high percentage of homes in the National Park with no usual residents (19.2%) and its impact on the social well-being of a number of communities where the overall proportion may be significantly higher e.g. Lynton & Lynmouth where 28.5% of household spaces have no usual residents.³²⁶ All new housing in the National Park should be affordable housing to meet local needs. Principal residence housing will therefore only be permitted in very specific circumstances where it can be demonstrated to be necessary to enable the delivery of affordable housing schemes in accordance with Policies HC-D1 (Conversions to Housing in Settlements or HC-D2 New Build Housing in Settlements). Principal residence housing will also apply to any new dwelling units created through the subdivision of existing dwellings (HC-D12 Subdivisions of Existing Dwellings) and the conversion of hotels/guesthouses to single units of accommodation and in accordance with the tests set out in Policy RT-D3 (Safeguarding Serviced Accommodation).

HC-S5 PRINCIPAL RESIDENCE HOUSING

Open market housing will not be permitted. Any market housing required to enable the delivery of affordable housing to meet local needs in accordance with HC-S2, HC-D1, Conversions to Housing in Settlements, HC-D2 New Build Housing in Settlements, RT-D3 Safeguarding Serviced Accommodation) or created through subdivision of existing dwellings (HC-D12) will be 'principal residence' housing.

HOUSING IN SETTLEMENTS

7.85 The capacity of the settlements to accommodate further housing has been investigated through a detailed landscape sensitivity study. It shows that only 333 new build houses could potentially be provided within these settlements on greenfield land without harming the landscape of the National Park. This figure does not include those opportunities arising from redevelopments, brownfield land and conversions of existing buildings however neither does it include other issues which may mean that remaining sites are not suitable for housing development such as highway issues. This demonstrates the importance of making maximum use of the existing stock of accommodation, buildings and previously developed land/buildings to reduce the level of greenfield housing development within the National Park and ensure that, in the longer term, there will still be some suitable housing sites in settlements to help meet the needs of the National Park's communities.

CONVERSIONS TO DWELLINGS IN SETTLEMENTS

7.86 Policy HC-D1 provides for the change of use of existing buildings in settlements and Policy HC-D2 for new build housing in settlements. Any market ('Principal Residence') housing to fund affordable housing proposed in Local Service Centres or Villages and otherwise in accordance with Clause 2 and 3 of Policy HC-D1 will be the minimum number required to deliver the affordable housing. For clause 2 of Policy HC-D1, whether a building is able to accommodate more than one dwelling unit, will be judged on the basis of a maximum floorspace of 90sq metres or less.

7.87 The National Park Authority intends to provide further guidance on the implementation of its affordable housing policies.

³²⁶ Office for National Statistics 2011 Census compared to 4.3% for England (includes a smaller proportion of empty homes)

POLICY HC-D1 CONVERSIONS TO DWELLINGS IN SETTLEMENTS

- 1. Within the identified Local Service Centres, Villages and Rural Communities, the change of use of a non-residential building(s) to a dwelling(s), together with any consequent building alterations, will be permitted where:**
 - a) the building is well related to existing buildings, and conserves or enhances the character of the settlement;**
 - b) the proposal meets the requirements of Policy CE-S5**
 - c) it will meet an affordable local need, there is a proven local need for the dwelling(s) and that need cannot be met within the existing housing stock or from sites/ buildings already with planning permission; and**
 - d) the intended occupants meet the requirements of the local need occupancy criteria in Policy HC-S3 clauses 1-6;**
 - e) the dwelling(s) will be affordable by size and type to local people and will remain so in perpetuity. For privately / owner occupied properties the net floorspace will be 90 square metres or less;**
 - f) A planning obligation is secured to ensure that occupancy of the dwelling(s) is confined to persons in local housing need in perpetuity.**
 - g) Proposals for 'extended family dwellings, accord with criteria 1 (a) (b) (c) (e) and (f) above and Policy HC-D8, are within the curtilage of an existing dwelling, and will be occupied by a person(s) in accordance with clause 8 of Policy HC-S3.**
- 2. The proposal must address an identified local need and be affordable with occupation restricted to local people in perpetuity in accordance with clauses 1 (c) and (d) above unless, within the Local Service Centres and the Villages identified in Policy GP4 only, for buildings that are able to accommodate more than one dwelling unit, it can be clearly and robustly demonstrated to the satisfaction of the NPA that:**
 - a) it is not financially viable, although the intention will still be to maximise the proportion of affordable homes within viability constraints; or**
 - b) it would provide more affordable homes than are needed in the parish and the adjacent parishes, now and in the near future.**
- 3. For proposals under Clause 2 above an element of principal residence market housing may be permitted where:**
 - a) it is required to enable delivery of affordable housing which cannot be made financially viable without it;**
 - b) it is the minimum number of principal residence market houses required to support the delivery of the required affordable housing. The intention will remain the provision of 100% affordable housing to meet an identified local need for dwellings;**
 - c) the affordable dwellings will be occupied by a person(s) with a proven housing need in accordance with the local occupancy definition in Policy HC-S3;**
 - d) in terms of size and type, the mix of principal residence market housing is in accordance with Policy HC-S1 ;**
 - e) Any housing which may be permitted to deliver the required affordable housing accords with Policy HC-S5 (Principal Residence Housing).**
 - f) The affordable housing and principal residence market housing will be indistinguishable and will be fully integrated on the development site; and**
 - g) The affordable housing will be provided broadly in-step with the principal residence housing as development progresses. The timing and delivery of the affordable housing and principal residence housing will be secured through the planning approval.**

Continued..

- 4. Proposals for specialist housing will be permitted where they accord with Policy HC-D3 (Specialist Housing for Exmoor's Communities; and:
 - a) they meet an identified local need and accord with criteria 1 of this Policy; or,
 - b) they accord with Clause 2 and 3 (a) to (g) of this policy, and will be occupied by a person(s) in accordance with clause 7 of Policy HC-S3.**
- 5. The National Park Authority will ensure that, whether through a single permission or incremental permissions, the number of affordable dwellings created is that which would have been required if the scheme had been constructed as a single development having regard to the planning unit and previous permissions since the adoption of the March 2005 Local Plan. In the case of the creation of more than one dwelling from a single previous planning unit (whether at once or over a period of time) the development should contribute the maximum number of local need affordable homes consistent with criteria 2a) and 2b) of this policy.**
- 6. Where there is reason to believe that the proposal is formulated with a view to circumventing or mitigating affordable housing requirements, including where the National Park Authority considers that a building is able to accommodate more than one dwelling unit, its capacity will be re-calculated.**
- 7. In the case of 2 (b), subject to viability considerations, the affordable housing provision that the scheme could have accommodated will be provided through a linked scheme of affordable housing needed elsewhere in the National Park. Where this cannot be achieved, a financial contribution will be required towards affordable housing needed elsewhere in the National Park in accordance with Policy HC-S4. Any housing which may be permitted to deliver the required affordable housing should be principal residence housing (HC-S5) and will be the minimum number required to support the delivery of the affordable housing.**
- 8. Where permission is granted condition(s) will be attached removing permitted development rights granted by the Town and Country Planning (General Permitted Development) Order 1995 in respect of extensions and alterations to ensure that the character of the building is conserved and dwellings remain more affordable, not exceeding 90sqm in size.**
- 9. Where permission is granted for employment uses as part of the proposal a condition may be attached tying the occupation of the dwelling to the operation of the business.**

NEW BUILD HOUSING IN SETTLEMENTS

- 7.88 The 1997 Local Plan restricted open market new build housing within villages to redevelopment sites. This was a response to the high level of open market in-fill housing built during the previous five-20 years that tended to erode the character of Exmoor's villages. The approach in the 2005 Plan was to prioritise the provision of local needs affordable housing in all settlements through both new build and conversions for dwellings in order to make the best use of existing buildings, minimise building on greenfield land and help retain vibrant local communities.
- 7.89 This Plan continues the approach in settlements of seeking all new build housing to be affordable housing to meet local needs. Given the outstanding character of Exmoor's settlements, new build housing will have to be located and designed so that it conserves or enhances the individual character of each settlement. It is considered that this policy approach has been appropriate in the context of National Park designation and has been successful in delivering new affordable housing through the exceptions site approach. Since adoption of the former ENP Local Plan in 2005, 65 homes have been built and a number are in the pipeline. In a designated area with demonstrably few sites suitable for housing in the longer term, the NPA wishes to retain the focus on addressing the community's need for affordable housing. In principle, it does not consider that providing for cross subsidy housing is appropriate in a National Park context given the evidence of the need to minimise new build housing to that

which is required, thereby the need for new housing on greenfield sites and to ensure a supply of sites in the longer term.

- 7.90 However, at the time of the plan being drafted, there have been national changes to the way in which affordable housing is funded. Reductions in public housing grant administered by the Homes and Communities Agency (HCA) together with a requirement to set higher rent levels for affordable homes as a condition of that funding to enable a greater reliance on private lending for affordable housing schemes mean that, at the current time, it is very difficult for Registered Providers to deliver affordable housing on exceptions sites. The NPA has therefore taken the difficult decision, while seeking all housing to be for affordable local need, to consider cross subsidy where it can be clearly demonstrated that there are no other means of funding a scheme including through cross funding from other schemes in a Registered Provider's programme outside the National Park. In the meantime the case for realistic levels of grant funding to ensure that the National Park can be protected and ensure local needs affordable housing can be provided without the need for additional cross subsidy housing will continue to be made.
- 7.91 A key factor in achieving affordable new build housing is to obtain land/buildings at the lowest possible value such that it is possible for housing associations and local households to acquire it for the purposes of affordable housing. The impact of the housing policies within this Local Plan based on the rural 'exceptions' approach should be to keep land development values lower than would otherwise be the case. Proposals which include additional housing to help deliver affordable housing schemes through Registered Providers, will be scrutinised through 'an open book' approach to ensure it can be demonstrated that it is essential for the viability of the scheme because it replaces current reductions in public housing grant to Registered Providers rather than increases land value.
- 7.92 This is because the number of new dwellings on greenfield land should be minimised to that which is necessary to address local housing needs. Higher land values will impact on scheme viability and in the longer term would result in a greater number of houses to deliver the affordable using up suitable housing sites more quickly reducing the ability to deliver affordable housing for local needs in the National Park in the longer term.
- 7.93 Consistent with General Policy 4 (Spatial Strategy), the National Park Authority will monitor permissions for housing in relation to the landscape capacity of individual settlements and the National Park as a whole to accommodate new housing development. Where monitoring indicates that capacity to accommodate local needs housing over the longer term may be compromised, a review of the approach to providing for additional housing to help deliver affordable housing schemes will be triggered to ensure that it is consistent with National Park purposes. In such an event, the potential for alternative approaches to providing for local affordable housing will be crucial (see paragraph 7.61 above).
- 7.94 To be consistent with this policy (which requires that, where principal residence market housing is proposed as part of a scheme which will be owned or controlled by a Registered Provider, it will be the minimum number required to deliver the affordable housing), the NPA will expect that the number of affordable homes will be greater than the number of open market dwellings. This applies the approach set out in the NPPF that planning authorities should consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs. An open book approach assessing financial viability on a case by case basis will be used.

POLICY HC-D2 NEW BUILD DWELLINGS IN SETTLEMENTS

- 1. Housing development will be permitted in settlements where:**
 - a) the site is well related to existing buildings and any development would conserve or enhance the character of the traditional settlement pattern;**
 - b) it will meet an affordable local need, there is a proven local need for the dwelling(s) and that need cannot be met within the existing housing stock, or from-sites/buildings already with planning permission;**
 - c) the intended occupants meet the requirements of the local need occupancy criteria in Policy HC-S3 clause 1;**
 - d) the dwelling(s) will be affordable by size and type to local people and will remain so in perpetuity. For privately / owner occupied properties the net floorspace will be 90 sqm or less;**
 - e) the development is in keeping with the character and appearance of the site and its surroundings;**
 - f) the design and layout of the development meet the requirement of Policy CE-S7; and**
 - g) a planning obligation is secured to ensure that occupancy of the dwelling(s) is confined to persons in local housing need in perpetuity.**
- 2. All new build housing must address an identified local need and be affordable with occupation restricted to local people in perpetuity unless, in the Local Service Centres and Villages identified in Policy GP4 only, it can be clearly and robustly demonstrated to the satisfaction of the NPA that:**
 - a) for a housing scheme which will be owned or controlled by a Registered Provider (including Housing Associations), an element of principal residence market housing is required to enable delivery of affordable housing which cannot be made financially viable without it;**
 - b) it is the minimum number of principal residence market houses required to support the delivery of the required affordable housing. The intention will remain the provision of 100% affordable housing to meet an identified local need for dwellings;**
 - c) the affordable dwellings will be occupied by a person(s) with a proven housing need in accordance with the local occupancy definition in Policy HC-S3 Clauses 1-6.**
 - d) any housing which may be permitted to deliver the required affordable housing accords with Policy HC-S5 (Principal Residence Housing);**
 - e) in terms of size and type, the mix of principal residence market housing is in accordance with Policy HC-S1;**
 - f) the affordable housing and principal residence market housing is indistinguishable and fully integrated on the development site;**
 - g) the affordable housing will be provided broadly in-step with the principal residence housing as development progresses. The timing and delivery of the affordable housing and principal residence housing will be secured through the planning approval.**
- 3. Where permission is granted, a condition will be attached removing permitted development rights granted by the Town and Country Planning (General Permitted Development) Order 1995 in respect of extensions to ensure that dwellings do not exceed 90sqm in size.**

SPECIALIST HOUSING FOR EXMOOR'S COMMUNITIES

7.95 In accordance with Policy HC-S1 which aims to ensure that the mix in terms of the size, type and tenure of housing permitted in the National Parks contributes to that which is needed by National Park communities, Policy HC-D3 makes provision for specialist housing for older people and other vulnerable members of the National Park's communities.

NATIONAL POLICY CONTEXT

7.96 The National Parks Vision and Circular 2010 confirmed that a focus on affordable housing is appropriate and that authorities should work with local authorities and other agencies to meet the needs of local communities with affordable housing remaining affordable in the longer term.³²⁷ The National Parks Vision and Circular does not comment specifically on housing for older people or those with care needs.

7.97 The National Planning Policy Framework states that in rural areas, exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Local planning authorities should, in particular, consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs.

7.98 The Framework states that authorities should plan for a mix of housing including those that cater for the needs of older people and people with disabilities (including retirement and specialised housing for those with support or care needs).³²⁸

7.99 To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.

7.100 The SHMA calculated that, the four districts making up the Northern Peninsula Housing Market Area, including the National Park, have a disproportionately older population when compared with the region and England as a whole with 30% of pensionable age. The number of elderly households is growing with a high level of growth projected for those beyond retirement age.³²⁹ In West Somerset a very large growth in one person households is predicted.³³⁰ In the National Park, a quarter of all households (1,160 households) with no dependent children include one or more persons with a long term health problem or disability.³³¹

7.101 Evidence from consultation indicates high support for local needs affordable housing. Additionally there was support for the principle of local housing.³³² The Strategic Options Consultation sought views on how affordable housing should be delivered. There was some support for market and local housing to help deliver affordable housing and also because it could support provision of other housing for local housing needs such as for an ageing population.³³³

7.102 As people grow older their housing needs often change and homes may become unsuitable with many single elderly residents living in large family houses that are not appropriate to their needs. Older people or those with disabilities may have specialist accommodation needs that are not met by the general housing stock. The financial implications of an ageing population and measures necessary to sustain independent living by older people are being considered nationally including equity release arrangements and services that help older people adapt their homes to allow them to live in them for longer.³³⁴

7.103 Evidence shows that West Somerset has the highest average age in England and Wales. Exmoor has an even greater concentration of older people, the National Park Authority

³²⁷ DEFRA, English National Parks and the Broads UK Government Vision and Circular (London, 2010). Para. 79.

³²⁸ CLG National Planning Policy Framework (London, 2012), para. 50 and Annex 2.

³²⁹ Housing Vision, Northern Peninsula Strategic Housing Market Area Assessment. paras 4.74 and 4.84 including 4,896 households in the National Park area 2006-2026

³³⁰ *ibid* para 4.81

³³¹ Office for National Statistics 2011 Census

³³² Exmoor National Park Authority Strategic Options Consultation (2011-12) <http://www.exmoor-nationalpark.gov.uk/planning/planning-policy/local-development-framework/core-strategy>

³³³ *Ibid*, Question 4.

³³⁴ Lifetime Homes, Lifetime Neighbourhoods: a National Strategy for Housing in an Ageing Society (2008). Panel for Innovation, Housing our Ageing Population: HAPPI report (2009, HCA, London). All Party Parliamentary Group on Housing and Care for Older People, Housing our Ageing Population: Plan for Implementation (HAPPI 2' Report) (2012). Housing in Later Life Planning Ahead for Specialist Housing for Older People, (December 2012). House of Lords Select Committee on Public Services and Demographic Change: Ready for Ageing? (14 March 2013, London: The Stationery Office Limited HL Paper 140).

recognises the importance of supporting the housing needs of an ageing population.³³⁵ New information will be considered on specialist and older people's housing needed by the National Park's communities.³³⁶ The Rural Housing Project (RHP), in addition to assessing affordable need, now analyses survey data for those in housing, though not affordable, need. Over time, information collected by the RHP should provide a more complete picture of local housing need including of older persons' households. It appears that there are local households, particularly of older people, living in accommodation unsuited to their needs. In some cases it will be possible for residents who have access to appropriate support and finance to remain in their own home through adaptations or reducing its size to create a new housing unit through subdivision. This may provide equity for necessary adaptations or enable a family member to provide support through living close by.

- 7.104 Within the context of National Park designation and other housing policies in this plan, the NPA considers it is important that opportunities should be taken for housing to contribute to the local need for older people's specialist housing. The limited supply of suitable housing land means that this principle should apply to affordable housing. However, in delivering affordable housing where there is an identified need for specialist housing, it will also apply to any market (principal residence) housing which may be permitted to fund affordable housing.
- 7.105 Evidence on the high external demand for housing in the National Park from older age groups indicates that even if new housing, were tailored to the kind and type of housing needed locally, that it would be likely to be predominantly occupied by older people moving to the area rather than by those with a local connection, exacerbating the trend towards an older population. Given the limited availability of suitable housing sites in Exmoor's settlements and the competing demands on them for locally needed uses, the question of meeting general needs beyond those of the National Park becomes an important issue. In accordance with the National Park's statutory purposes and duty, the focus should be on the needs of the local community. Strategic Policy HC-S1 therefore provides for housing to address a local need for older people's accommodation where adequate care and assistance cannot be provided within the existing housing stock. Policy HC-D3 requires that, through the use of planning obligations, local occupancy ties will be attached to permissions for new specialist housing so that they meet the needs of the National Park's older residents and other vulnerable members of the community in the longer term. Work on viability indicates where land values remain reasonable, that local housing has the potential to help fund local needs affordable housing. Proposals for residential institutions (HC-S8), including specialist accommodation providing care, such as nursing homes should provide evidence on the local need for the development.
- 7.106 Since new housing will be a small proportion of the existing stock, the Plan also requires that new housing should meet 'Lifetime Homes' standards to ensure that a stock of housing is built up which should be suitable for people over their lifetime. Policies also support the subdivision/adaptation of existing homes to help to enable older people and those in need of care and assistance to continue to live in their own homes (Policy HC-D12). This will also contribute to increasing the stock of smaller dwellings.
- 7.107 Specialist housing should be specifically designed to meet the needs of older people, generally those of retirement age, and/or other vulnerable members of the community who require care and assistance and whose needs cannot otherwise be met through the existing housing stock including new housing built to 'Lifetime Homes' standards. As such it will be subject to additional standards. Proposals should accord with CE-S4 and, where they relate to existing traditional buildings, should ensure that any alterations or conversion work do not result in harm to the fabric or character of the building.
- 7.108 The policy requires that owner occupied specialist housing should not exceed 90 square metres in size. This is to ensure that new dwellings are reasonable in size, contributing that housing to the existing stock which is most needed by Exmoor's communities and ensuring that land take is minimised given the limited number and finite nature of suitable housing sites in the National Park's settlements. Evidence indicates 2 bedroom housing would be the most appropriate size.³³⁷ The Exmoor Housing SPD will set out in more detail, standards and requirements relating to assessing the need for, size type and tenure of housing including for specialist housing for older people and arrangements for cascades for future occupiers.

³³⁵ Housing Vision Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset (2013).

³³⁶ Ibid and Office for National Statistics 2011 Census – 5.1% of Exmoor's population considered their health to be 'bad' or 'very bad'.

³³⁷ Housing Vision, Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset (2013).

- 7.109 Consistent with Policy HC-S1, the provision of affordable housing with local occupancy ties will remain the principal community identified need within the National Park. Affordable housing within the National Park, and any market (principal residency) housing required for its delivery, should contribute towards the local need for specialist housing for older people and other vulnerable members of the community as part of a scheme. In all cases proposals must be in accordance with housing and other policies in this plan.
- 7.110 For proposals to achieve the conservation or enhancement of listed buildings which accord with Policy HC-S1 clause 3, and Policy HC-S2, the potential to contribute to an identified local need for specialist housing will be considered consistent with the intention to maximise the provision of affordable local needs housing.

POLICY HC-D3 SPECIALIST HOUSING FOR EXMOOR'S COMMUNITIES

- 1. Proposals which respond to the specific requirements of the National Park's communities by addressing an identified local need for specialist housing for older people and other vulnerable members of the community who require care and assistance and which cannot be provided within the existing housing stock or from sites/buildings already with planning permission may be permitted through:**
 - a) supporting the appropriate subdivision and adaptation of existing dwellings (Policy HC-D12);**
 - b) where there is an identified need for specialist housing, ensuring that proposals for local need affordable housing make provision in accordance with Plan policies;**
 - c) ensuring that proposals for more than one dwelling unit of local needs affordable housing and any principal residence market housing permitted through, Policies HC-S2 (Housing Conservation and Enhancement), HC-D1 (Conversions to Dwellings in Settlements), HC-D2 (New Build Dwellings in Settlements) provide specialist housing for older people and other vulnerable members of the community where:**
 - i. there is a proven local need in accordance with Policy HC-S3. A planning obligation will be secured to ensure that the occupancy of local need specialist housing dwelling(s) is confined to local persons in perpetuity in accordance with Policy HC-S3 clause 7.**
 - ii. it will be integrated into the local community to enable access to required services and facilities;**
 - iii. it is built to standards as set out in the Exmoor National Park Housing SPD. For housing not controlled through a Registered Provider, the net floorspace will be 90 sqm or less; and**
 - iv. The proposal accords with strategic policies CE-S4 to CE-S7 including in ensuring that any conversion work does not result in harm to the fabric or character of the building.**
- 2. In all cases, proposals should avoid flood risk areas and incorporate climate change adaption measures, particularly in relation to heating and cooling.**
- 3. Specialist Housing Proposals should accord with Policy AC-D2 (parking) to ensure that provision is appropriate for the needs of residents.**
- 4. Where permission is granted a condition will be attached removing permitted development rights granted by the Town and Country Planning (General Permitted Development) Order 1995 in respect of extensions to ensure that dwellings do not exceed 90sqm in size.**
- 5. The planning obligation will allow, where properties become vacant, and where no person in need of specialist housing, can be found to occupy a property, other persons with a local affordable housing need consistent with HC-S3 clauses 1-6 to occupy the dwelling.**
- 6. The provision of specialist accommodation including that offering care through a residential institution should be in accordance with Policy HC-S8 (Residential Institutions).**

HOUSING OUTSIDE SETTLEMENTS

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

- 7.111 National guidance states that housing should be located where it will enhance or maintain the vitality of rural communities and that new isolated homes in the countryside should be avoided. Policies in this plan therefore focus new build housing in the settlements identified in Policy GP4.
- 7.112 However, housing for rural workers in agriculture and forestry who have an essential need to live permanently at or near their place of work can sometimes justify a new home in open countryside. Nevertheless, a rural enterprise must be acceptable in its location before a new home is even considered and it will often be more sustainable for workers to live in nearby towns or villages or in suitable existing housing or buildings.
- 7.113 Justifying a new home outside of a settlement in the open countryside depends on the essential functional and financially sound needs of an enterprise for full-time employees to live at their place of work. Normally, this will be full-time agricultural workers as forestry employment, based upon contract labour is often less locationally fixed. Dwellings for rural workers in the open countryside, whether through a conversion or for a new build dwelling, will therefore require the submission of an independently prepared appraisal to accompany an application. This will need to justify an essential functional need and the long-term financial viability of the business for any accommodation, with a requirement that the worker(s) need to be readily available at most times, day and night for most of the year, and bearing in mind current and future business requirements. Where there is any doubt as to the permanent need for the dwelling, or the financial viability of the business is marginal, then temporary permission may be given for a residential caravan in accordance with Policy HC-D9.
- 7.114 Policy HC-D6 sets out criteria for assessing applications for housing in the open countryside for rural workers in agriculture, forestry or other rural land based enterprises. Proposals for both the conversion of existing buildings to dwellings (HC-D4) or proposals for new build housing (Policy HC-D5) for rural workers will also need to accord with Policy HC-D6. Proposals for housing for workers in the open countryside who are not employed in agriculture, forestry or other rural land based enterprises will be considered for an Exmoor worker through the reuse of existing buildings for local need affordable housing in accordance with Policy HC-D4 and the local occupancy criteria in Policy HC-S3 clause 1,e) where they need to live close to their place of work. The definition of an Exmoor worker will be set out in the Exmoor Housing SPD.
- 7.115 The conversion of buildings in the open countryside to provide accommodation helps to reduce demand for further house building elsewhere on greenfield sites. Policy HC-D4 provides for the conversion of existing buildings to dwellings for the essential functional need for a rural worker (as above) and as local need dwellings. It also makes provision for 'extended family' accommodation or for 'succession farming'. Where permission is granted for residential re-use for local needs, occupancy will be controlled through planning obligations in the same way as conversions within settlements. For rural workers, occupancy will be controlled through occupancy conditions consistent with the approach for a new build dwelling in the open countryside (Policy HC-D5).
- 7.116 In accordance with Policy CE-S5, proposals will have to be sensitively designed to conserve the character of the building and its landscape setting. In respect of local needs housing or 'extended family dwellings', permission will only be granted outside a settlement the open countryside where there is an existing dwelling in a farmstead, and not in isolated locations. In assessing proposals for the conversion of groups of redundant traditional buildings encouragement will be given to joint business use.
- 7.117 In considering proposals for new build dwelling for a rural worker through Policy HC-D5, the National Park Authority will need to be satisfied that there is no existing accommodation potentially available (or which has recently been sold which could have met the needs), or that the conversion/change of use of existing buildings or a temporary caravan is not a viable alternative. Where necessary, the National Park Authority will attach a condition upon any other existing dwelling(s) on the holding, restricting the occupancy to those engaged in agriculture, forestry or other business. Planning obligations may also be attached tying the dwelling to the

holding or business to ensure that dwellings are not disposed of separately from the business as a whole.

7.118 Proposals for residential development associated with a low impact sustainable or environmental land based lifestyle (which can also be known as ‘One Planet Development’), may include temporary structures such as traditional ‘benders’ or yurts constructed of natural materials for which no conventional foundations are required, will be considered in terms of whether they are in accordance with the policies in this plan. These include the Spatial Strategy (Policy GP4), housing, landscape character and design policies for example.

7.119 Applications to remove agriculture or rural worker occupancy ties will be carefully assessed. When the exceptional need for this type of home no longer exists it can contribute to the provision of local need including intermediate or “more affordable” housing or where a need cannot be identified, holiday let accommodation.

POLICY HC-D4 CONVERSIONS TO DWELLINGS IN THE OPEN COUNTRYSIDE

1. In the open countryside the change of use of a non-residential building(s) to a dwelling(s), together with any consequent building alterations, will be permitted where:
 - a) the need for the dwelling(s) cannot be met within the existing housing stock, from sites/buildings already with planning permission or through the acceptable extension and/or subdivision of an existing dwelling;
 - b) in the case of local need accommodation (Policies HC-S1 and HC-S3 clauses 1-6), the building is located in a hamlet or farmstead where there is an existing dwelling;
 - c) in the case of ‘extended family accommodation’, the building is located in a farmstead within an existing group of buildings and in close association with an existing dwelling;
 - d) the intended occupants meet the requirements of the local need criteria in Policies HC-S1 and HC-S3 clauses 1-6, or the proven essential need in Policy HC-D5, or for succession farming in Policy HC-D7 or ‘extended family’ in Policy HC-S3 clause 8 and HC-D8;
 - e) in the case of local need accommodation (Policies HC-S1 and HC-S3 clause 1-6), the dwelling(s) will be affordable by size and type to local people. For privately /owner occupied properties, including for ‘extended family accommodation’ (HC-D8) and a ‘succession farming’ dwelling (HC-D7) the net floorspace will be 90 sqm or less. A planning obligation is secured, to ensure that occupancy of the dwelling(s) is confined to persons in local housing need in perpetuity.
 - f) the proposal meets the requirements of Policy CE-S5 (Principles for the Conversion or Structural Alteration of Traditional Buildings).
2. Where permission is granted to meet the proven essential functional need for a rural, worker in accordance with policy HC-D5 and HC-D6, , a condition will be attached to ensure that occupancy of the dwelling(s) is confined to those meeting the requirements of Policy HC-D6. Where permission is granted for a succession dwelling in accordance with Policy HC-D7 a condition will be attached to ensure that occupancy of the dwelling(s) is confined to those meeting the requirements of a full time or additional 0.5 of a full time agricultural worker in accordance with Policy HC-D7. Planning conditions will be used to ensure that the occupancy of any existing dwelling(s) is also limited to persons able to demonstrate a proven essential need for accommodation. A planning obligation will be secured tying the dwelling(s) including any permitted under the succession farming Policy HC-D7 to the holding to ensure that they are not sold off separately.

Continued...

- 3. In the case of 'extended family' accommodation, the dwelling accords with Policy HC-D8, the net floorspace will be 90 sqm or less and the dwelling will be tied to the associated existing dwelling to ensure that they are not sold off separately.**
- 4. Where permission is granted a condition will be attached removing permitted development rights granted by the Town and Country Planning (General Permitted Development) Order 1995 in respect of extensions to ensure that dwellings do not exceed 90sqm in size and for alterations to ensure that conserve the character of the building is conserved.**
- 5. Where permission is granted for employment uses as part of the proposal a condition may be attached tying the occupation of the dwelling to the operation of the business.**
- 6. Proposals for the change of use together with any consequent building alterations of an existing hotel or serviced visitor accommodation to residential use where it is able to accommodate more than one dwelling will be in accordance with Policy RT-D3 (Safeguarding Serviced Accommodation).**

POLICY HC-D5 NEW BUILD DWELLINGS IN THE OPEN COUNTRYSIDE

- 1. New dwelling(s) within the open countryside will only be permitted where:**
 - a) the accommodation is designed to meet a proven essential functional need for a rural worker in accordance with Policy HC-D6 that cannot be met within the existing housing stock, or through the provision of a temporary residential caravan in accordance with Policy HC-D9 or the conversion/change of use of an existing building in accordance with Policies CE-S5 and HC-D4;**
 - b) the dwelling is located close to existing buildings on the holding;**
 - c) the design and layout of the development meet the requirements of CE-S7 and the net floorspace will be 90 sqm or less unless the Authority is satisfied that a larger dwelling is required, the size of the property is commensurate with the needs of the holding, it can be sustained by the farm business and it would be affordable for the essential need in perpetuity;**
 - d) there would be no conflict with the conservation of the landscape, wildlife or cultural heritage interests;**
 - e) a planning condition is attached to ensure that occupancy of the dwelling(s) is confined to rural workers in accordance with Policy HC-D6.**
- 2. Where permission is granted a condition will be attached removing permitted development rights granted by the Town and Country Planning (General Permitted Development) Order 1995 in respect of extensions to ensure that dwellings do not exceed 90 sqm in size.**
- 3. Where permission is granted for a new dwelling on an agricultural or forestry holding that has an existing dwelling(s) under the control of the applicant which needs to be used in connection with the enterprise, a condition will be attached to ensure that the occupancy of any existing dwelling(s) is also limited to persons able to demonstrate a proven essential need for that accommodation, in order to minimise the need for new houses in the open countryside. A planning obligation will be secured tying the dwelling(s) to the holding to ensure that they are not sold off separately.**

POLICY HC-D6 RURAL WORKERS

New housing to meet the needs of rural workers in the open countryside will be in accordance with Policy HC-S1 and HC-D4 or HC-D5 and where it is justified by a proven essential functional need for a full time rural workers in agriculture, forestry or other rural land based enterprises to live permanently at or near their place of work. In the case of agriculture or other rural land based enterprises, the business is proven to be financially viable in the long term, it is extensive in nature, the land management activity contributes to the conservation or enhancement of the natural beauty and wildlife of the National Park and is in accordance with the tests set out in Annex 2 of this Plan³³⁸.

SUCCESSION FARMING - SECOND DWELLINGS ON ESTABLISHED FARMS

7.120 Consultation indicated support for the re-use of existing buildings to provide for succession farming.³³⁹ There is evidence that the age profile of farmers on Exmoor is increasingly aged. To encourage younger people to manage farm businesses, a second dwelling may be considered on established farms that are financially sustainable where the criteria for a full time worker as set out in Policy HC-D5 (new build housing in the open countryside) cannot be fully satisfied. To satisfy the terms the policy it will be required that: the proposal accords with Annex 2 of this Plan; and:

- a) there are secure and legally binding arrangements in place to demonstrate that management of the farm business has been transferred to a person younger than the person currently responsible for management, or, that transfer of management is only conditional upon grant of planning permission for the dwelling. The younger person should demonstrate majority control over the farm business and be the decision maker for the farm business; or,
- b) there is an existing functional need for an additional 0.5 or more of a full time worker and that person obtains at least 50% of a Grade 2 Standard Worker salary, (as defined by the latest version of the Agricultural Wages Order), from the farm business;
- c) the enterprise and activity concerned has been established for at least three years and both the enterprise and the business need for the job, are financially sound, being profitable for at least one of them with a clear prospect of remaining so for a reasonable period of time. Evidence of actual or potential economic performance will be required. To assess economic sustainability it will be necessary to show the business has a reasonable prospect of providing a market return for all operators for the amount of management and manual labour inputs, including the job for which the rural enterprise dwelling is being sought, for at least five years from the anticipated completion of the proposed development. This should be assessed on the basis of what is a realistic income for the skills of the operator. A financial test is also necessary to assess the size of dwelling which the enterprise can afford to build and maintain. The requirements of the enterprise rather than of the owner or occupier will determine the size of dwelling that is appropriate. Dwellings which are unusually large in relation to the needs of the enterprise, or unusually expensive to construct in relation to the income it can sustain in the long-term, will not be permitted.
- d) the functional need could not be fulfilled by another dwelling or by converting an existing suitable building, or any other existing accommodation;
- e) It must also be demonstrated that the management successor or part time worker is critical to the continued success of the farm business, and that the need cannot be met in any other reasonable way, e.g. through the re-organisation of labour responsibilities.

7.121 In considering proposals, the NPA will need to be satisfied that there is no existing accommodation including through the extension and/or subdivision of an existing dwelling or through the conversion/change of use of existing buildings (or if any of these have recently been sold which could have met the need) or the use of a temporary caravan that which can be used to meet the needs of a resident worker. The NPA may investigate the history of the enterprise to establish the recent pattern of use of land and buildings (a sale may constitute evidence of lack of need) and why labour or residential arrangements cannot be re-organised to

³³⁸ Annex 2 to be drafted

³³⁹ Exmoor National Park Authority, Local Plan Options (November 2011)

ensure that the existing accommodation meets the needs of the enterprise without the need for a further dwelling.

7.122 The policy will only apply to the first additional dwelling to be attached to an established farm after the adoption of this Plan and not to subsequent dwellings.

7.123 The NPA may attach a condition removing permitted development rights for extensions which could result in the size of a dwelling exceeding what could be justified by the functional requirement, and which could affect the continued viability of the property for its intended use. A planning obligation will be secured tying the dwelling(s) to the holding or business to ensure that dwellings are not disposed of separately from the business as a whole. The NPA may, where necessary, attach a condition upon any other existing dwellings on the holding, restricting the occupancy to those engaged in agriculture, forestry or other business.

POLICY HC-D7 SUCCESSION FARMING - SECOND DWELLINGS ON ESTABLISHED FARMS

1. A new second dwelling within the open countryside may be permitted where:
 - a) The accommodation is designed to meet an existing proven functional need for an additional 0.5 or more of a full time agricultural worker to live permanently at their place of work on an established enterprise where the business is proven to be financially viable in the long term, it is extensive in nature and where the farming activity contributes to the conservation or enhancement of the natural beauty and wildlife of the National Park. Proposals should be in accordance with HC-S1 and the tests set out in Annex 2 of this Plan and will only be permitted where it can be demonstrated that the person obtains at least 50% of a Grade 2 Standard Worker salary, (as defined by the latest version of the Agricultural Wages Order), from the farm business need; or
 - b) There are secure and legally binding arrangements in place to demonstrate that management of the farm business has been transferred to a person younger than the person currently responsible for management, or, that transfer of management is only conditional upon grant of planning permission for the dwelling. The younger person should demonstrate majority control over the farm business and be the decision maker for the farm business;
 - c) it can be demonstrated that the management successor or part time worker is critical to the continued success of the farm business; and
 - d) that the need cannot be met in any other way including through the re-organisation of labour responsibilities;
 - e) the enterprise is financially sustainable;
 - f) that need cannot be met within the existing housing stock, or through the provision of a temporary residential caravan in accordance with Policy HC-D9 or the conversion/change of use of an existing building in accordance with Policy CE-S5 and HC-D4;
 - g) The dwelling is located close to existing buildings on the holding;
 - h) The design and layout of the development meet the requirements of Policy CE-S7 and the net floorspace will be 90 sqm or less to ensure that the size of the property would be affordable for the essential need in perpetuity;
 - i) There would be no conflict with the conservation of the landscape, wildlife or cultural heritage interests; and
 - j) A planning condition is attached to ensure that occupancy of the dwelling(s) is confined to rural workers in accordance with Policy HC-D6.

- 2. Where permission is granted a condition will be attached removing permitted development rights granted by the Town and Country Planning (General Permitted Development) Order 1995 in respect of extensions to ensure that dwellings do not exceed 90 sqm in size.**
- 3. Where permission is granted for a new dwelling on an agricultural or forestry holding that has an existing dwelling(s) under the control of the applicant which needs to be used in connection with the enterprise, a condition will be attached to ensure that the occupancy of the existing dwelling(s) is also limited to persons able to demonstrate an essential functional need for that accommodation, in order to minimise the need for new houses in the open countryside.**
- 4. A planning obligation will be secured tying the dwelling(s) to the holding to ensure that it is not sold off separately.**
- 5. The policy will apply only to a single additional dwelling to be attached to an established farm after adoption of this Plan. Permission will not be granted for subsequent dwellings on the holding.**

'EXTENDED FAMILY' DWELLINGS

- 7.124 Policy HC-D8 sets out criteria to assess proposals for the re-use of an existing traditional building as a dwelling for 'extended family'.
- 7.125 In accordance with Policies including CE-S5, proposals will have to be sensitively designed and lead to an enhancement of the immediate setting to conserve the character of the building and the landscape of the National Park and to enable the family to provide support. Policy HC-D8 therefore requires that 'extended family' dwellings will only be acceptable through the re-use of an existing traditional building within the curtilage of a dwelling in a settlement identified in GP4 (a Local Service Centre, Village or Rural Community) or where there is an existing dwelling in a farmstead, and not in isolated locations.
- 7.126 The policy requires the occupants to be 'immediate family' defined by Policy HC-S3 (Clause 8, Local Occupancy Criteria) as a direct descendent or antecedent i.e. children, parents, grandparents, or great grandparents. Occasionally, relatives who do not meet the definition of immediate family may be considered where they are considered to be a dependent relative with an essential need to live close to another person because of age, family or medical reasons. In all cases, the occupier of the associated existing dwelling or the new dwelling should have a local connection of 10 years or more residence in the parish or adjoining parish. This reflects the National Park Authority's statutory duty to, and will provide additional housing choice for, Exmoor's local communities.
- 7.127 Where permission is granted for residential re-use for 'extended family', occupancy will be controlled through a local occupancy tie.

POLICY HC-D8 EXTENDED FAMILY DWELLINGS CRITERIA

1. **New extended family dwellings, in accordance with Policy HC-S1 may be permitted through the change of use of an existing traditional building (Policy CE-S5) in close association with an existing dwelling where they will be occupied in accordance with the local occupancy definition in Policy HC-S3, clause 8 within:**
 - a) **settlements identified in Policy GP4, within the curtilage of an existing dwelling; or**
 - b) **a farmstead within an existing group of buildings.**
2. **Proposals should demonstrate that:**
 - a) **the need for the dwelling(s) cannot be met within the existing housing stock, from sites/buildings already with planning permission or as a result of the extension/subdivision of the associated existing dwelling;**
 - b) **sufficient curtilage space can be provided without harming the setting of the building or the character of the surrounding landscape and the proposal will lead to an enhancement of the immediate setting;**
 - c) **in the case of buildings within an existing agricultural, or other primary business responsible for land management, the change of use will only be permitted where it can be demonstrated that the agricultural use of the existing building(s) to be reused is redundant;**
 - d) **the proposal either alone or cumulatively with other proposals will have an acceptable impact on the landscape, wildlife or historic environment of the National Park and be acceptable in terms of, the character and appearance of the development, the effect of any delineation of private space and otherwise accord with Policy CE-S7; and**
 - e) **satisfactory access and traffic requirements can be achieved and there will be no adverse impact on the locality including from the effect of traffic or on the amenity of neighbouring occupiers, either alone or in combination with other policies.**
3. **A planning obligation will be secured to ensure that the intended occupants meet the requirements of the extended family occupation in this policy and to tie the dwelling(s) to the main house to ensure that they are not sold off separately.**
4. **The variation of a planning obligation which restricts the occupancy of an extended family dwelling as set out in this policy will only be permitted where the occupancy of the dwelling is limited by agreement to local persons as defined in Policies HC-S1 and clauses 1 to 6 of HC-S3, or to provide for a proven essential need for rural workers in agriculture, forestry or other rural land based enterprises in accordance with Policies HC-D4, HC-D5 and HC-D6 or as a holiday let where the proposal is in accordance with Policy RT-D4.**
5. **The net floorspace will be 90 sqm or less to ensure the dwelling(s) will be affordable by size and type to local people in perpetuity.**
6. **Where permission is granted a condition will be attached removing permitted development rights granted by the Town and Country Planning (General Permitted Development) Order 1995 in respect of extensions to ensure that dwellings do not exceed 90 sqm in size and alterations to ensure that the character of the building is conserved and enhanced.**

RESIDENTIAL CARAVANS

CONTEXT

- 7.128 The siting of mobile homes or static caravans in the open countryside of the National Park causes significant landscape harm. Such structures are therefore not considered acceptable as permanent residential accommodation in the National Park by reason of the adverse impact caused by their design and form of construction. This approach is consistent with policy RT-D8 Static Caravan Sites.
- 7.129 Proposals to site a mobile home, static caravan or other temporary dwelling for rural land-based business reasons will be considered in accordance with HC-D6 Rural Workers, namely to allow time for the sustainability of a business to be tested.

SITING CONSIDERATIONS

- 7.130 The siting of mobile homes or static caravans on a temporary basis should be closely located to existing buildings related to the land-based business as part of the functional need to demonstrate that workers will need to be readily available to attend to the business at most times. Specific consideration will be given to minimising the visual impact of the structure and avoiding harm to landscape character and nature conservation interests. Applicants should submit a landscaping scheme as part of any proposal to demonstrate how the structure can be effectively screened and impacts on the surrounding landscape character minimised. Siting should also take account of access and parking requirements, connection to utility services and avoidance of flood risk.
- 7.131 The National Park Authority will monitor the occupancy of all temporary residential structures and ensure that no additions to the mobile/home caravan or ancillary structure are erected that change its status from a temporary structure to a building.
- 7.132 A condition will be attached to any temporary planning permission to ensure the static caravan or mobile home is removed from the site at the end of the period stated, and the land restored to its former condition, including the removal of all ancillary works and structures. The occupancy will also be restricted to named persons and their dependents.

POLICY HC-D9 RESIDENTIAL CARAVANS

- 1. The siting of residential caravans, mobile homes or other temporary structures for use as permanent residential accommodation in the open countryside will not be permitted.**
- 2. Permission will only be granted on a temporary basis where specific circumstances apply in relation to a proven essential need for a rural worker for the caravan in accordance with tests set out in policy HC-D6 Rural Workers and where it is demonstrated that:**
 - a) there is a clear intention to develop the rural land-based business;**
 - b) the functional need could not be met by an existing dwelling on site or within the local area;**
 - c) the structure, including access and parking arrangements, can be easily accommodated without adversely impacting on landscape character, visual amenity, sensitive habitats and wildlife species; and**
 - d) the site is not located in an area at risk of flooding.**
- 3. Where permission is granted, planning conditions will be attached or an obligation secured, to ensure that the permission:**
 - a) is for a time-limited period only,**
 - b) confined to persons and their dependents able to demonstrate the essential need for the accommodation, and**
 - c) when the time period for the accommodation expires, the temporary residential structure shall be removed from the site and the land restored to its former condition within a specified period.**

REPLACEMENT OF RURAL WORKERS OCCUPANCY CONDITIONS

CONTEXT

- 7.133 The workforce needs of individual agricultural, forestry or other rural enterprises change. Where the specific 'rural worker' occupancy is no longer required for a particular holding or business the existing dwelling can still play an important role in meeting the needs of qualifying workers in the local area.
- 7.134 Existing dwellings permitted prior to the adoption of the Local Plan with an agricultural or forestry worker condition or planning obligation will be permitted to alter the occupancy condition or vary the planning obligation to include rural workers, as defined by policy HC-D6 Rural Workers where the Authority considers the reasons for replacing the existing occupancy tie to be acceptable. This may allow some flexibility in relation to the range of rural workers that are linked to rural land-based enterprises including circumstances where the nature of the rural land-based enterprise has changed.
- 7.135 Applications for the removal of a 'rural worker' or 'succession farming' occupancy condition will be rigorously assessed. This will include examining how long the property has been built/converted and occupied by a rural worker or extended farming family (in relation to succession farming). The National Park Authority will require evidence that appropriate steps have been taken to try to sell or rent the property with the occupancy condition at a price reflecting the condition and potential market. If after a reasonable period, of a minimum of twelve consecutive months, the property has not been sold or let, then permission to remove the condition and replace it with a local need occupancy agreement in accordance with policies HC-S1 and HC-S3, may be permitted.
- 7.136 In appropriate cases, the National Park Authority will favourably consider the subdivision of larger dwellings to ensure that a dwelling permitted as an exception remains available to local persons in need of affordable accommodation (HC-D12 Subdivision of Existing Dwellings clause 3). Finally, the National Park Authority may consider holiday let accommodation on a temporary basis until there is a qualifying permanent resident.

HC-D10 REPLACEMENT OF RURAL WORKERS OCCUPANCY CONDITIONS

- 1. Proposals for the alteration of a condition, or variation of a planning obligation, which restricts the occupancy of a dwelling to a person employed or last employed in agriculture or forestry (permitted prior to the adoption of the Local Plan) to include the occupancy of a dwelling by a rural worker (as defined by policy HC-D6) will be permitted where the need for the alteration is demonstrated to the satisfaction of the Authority.**
- 2. The removal of a condition, or variation of a planning obligation, which limits the occupancy of a dwelling to a person employed or last employed in agriculture or forestry (prior to the adoption of the Local Plan), or for a rural worker as identified in policy HC-D6, or for succession farming as identified in policy HC-D7, will not be permitted unless it can be demonstrated that:**
 - a) Reasonable attempts have been made to allow the dwelling to be used by a person who could occupy it in accordance with the condition or obligation; and**
 - b) The long term need for the dwelling in the locality, in accordance with the condition or obligation, has ceased and removing the condition would be more appropriate than a temporary relaxation.**
- 3. Where, permission is granted for the removal of the occupancy condition or variation of a planning condition identified in clause 2, the occupancy of the dwelling will be limited by agreement to a person(s) in local affordable housing need as defined in Policy HC-S3.**
- 4. Where a local person cannot be found to occupy the dwelling, temporary permission will be given, on a personal basis, to let the dwelling for self-catering accommodation (non-serviced accommodation) until such time as a rural worker or a local affordable need arises. A holiday occupancy condition will be attached to any temporary permission granted.**

REPLACEMENT OF HOLIDAY OCCUPANCY AND EXTENDED FAMILY OCCUPANCY TIES

CONTEXT

7.137 On Exmoor, there is a considerable stock of self-catering holiday accommodation where the occupancy is restricted for the purposes of holiday letting. These units have been provided predominantly through the conversion of traditional buildings outside settlements. Since 1st March 2005, permission has been granted for a further 50 holiday lets through conversions, 88% (44 units) of which are located in the open countryside.³⁴⁰

7.138 Given that one of the key objectives of housing provision is to minimise new build housing development on greenfield land, by re-using existing buildings, there is an opportunity to utilise the resource of those buildings converted as holiday lets, to provide accommodation for local people. This may be of particular value in the open countryside where most holiday lets have been permitted historically and because a large proportion of Exmoor's workforce is based on part-time employment (33% of people in employment work part time).³⁴¹ This approach, therefore presents an opportunity for the creation of a local need affordable dwelling where new-build housing under the terms of policy HC-D6 Rural Workers or HC-D7 Succession Farming cannot be met.

REPLACEMENT OCCUPANCY CONSIDERATIONS

7.139 For holiday-lets subject to a holiday occupancy condition, a flexible approach to accommodate local housing needs will be taken to accommodate the replacement of holiday occupancy conditions with an agreement which will limit the occupancy to persons:

- a) in affordable housing need who meet the local occupancy criteria in policy HC-S3 and where the location accords with policy HC-D1 Conversions to Dwellings in Settlements or HC-D4 Conversions to Dwellings in the Open Countryside; or
- b) who meet the criteria for extended family dwellings in policy HC-S3 and where the location accords with HC-D8 Extended Family Dwellings.

7.140 Additionally, for those dwellings permitted as extended family homes in accordance with policy HC-D8, permission may be granted to vary the occupancy to persons in affordable housing need who meet the local occupancy criteria in policy HC-S3, or where the requirements of policy RT-D4 Non-Serviced Accommodation are met, the occupancy may be limited to short-term holiday occupancy.

7.141 If, in the future, it can be demonstrated that the use of the unit in accordance with the permitted occupancy is no longer required, the applicant may apply to remove the agreement and revert to the original occupancy tie – either as self-catering accommodation with a holiday occupancy condition or extended family accommodation through a planning obligation.

³⁴⁰ Information obtained from planning applications approved between 1/3/05-26/2/13.

³⁴¹ Office for National Statistics 2011.

HC-D11 REPLACEMENT OF HOLIDAY OCCUPANCY CONDITIONS AND EXTENDED FAMILY OCCUPANCY TIES

- 1. Permission will be granted for the replacement of a holiday occupancy condition with an agreement limiting occupancy to:**
 - a) Local persons in affordable housing need where the occupants meet the requirements of policy HC-S3 and the location accords with policy HC-D1 Conversions to Dwellings in Settlements, or policy HC-D4 Conversions to Dwellings in the Open Countryside; or**
 - b) Persons meeting the requirements of extended family accommodation in policy HC-S3, and the location in accords with policy HC-D8 Extended Family Dwellings;**
- 2. Where it can be demonstrated that:**
 - i. There is a local need for the accommodation; and**
 - ii. The building is capable of being permanently occupied without the need for any major reconstruction, extension or alteration that could be harmful to the character of the building or the amenity of neighbouring properties; and**
 - iii. Sufficient curtilage space can be provided without harming the setting of the building or the surrounding landscape character.**
- 3. For residential units where occupancy is restricted to extended family accommodation (HC-D8) permission will be granted for the replacement of the occupancy tie to:**
 - a) Local persons in affordable housing need where the occupants meet the requirements of policy HC-S3 and the location accords with policy HC-D1 Conversions to Dwellings in Settlements, or policy HC-D4 Conversions to Dwellings in the Open Countryside; or**
 - b) Occupancy as a holiday let where the requirements of policy RT-D4 Non Serviced Accommodation are met.**
- 4. Proposals to revert to the original occupancy condition or tie set out in clauses 1 and 2 will be permitted where it can be demonstrated to the satisfaction of the Authority that the proposed occupancy meets the requirements of policies in this Plan.**
- 5. Where permission is granted a condition will be attached removing permitted development rights granted by the Town and Country Planning (General Permitted Development) Order 1995 in respect of extensions to ensure that dwellings do not exceed 90 sqm in size.**

SUBDIVISION OF EXISTING DWELLINGS

CONTEXT

- 7.142 The sub-division of existing dwellings is a flexible approach that can help provide a solution to Exmoor's long term housing needs through providing smaller more affordable homes within the National Park. Consultation has shown that subdivision is considered to be an important option that makes efficient use of existing buildings and provides homes that can help address the needs of local communities such as to enable older people to downsize, or allow extended families to live independently but provide support where required e.g. care for older people or childcare arrangements.³⁴²
- 7.143 This policy applies to existing residential dwellings at the time of adoption of the Local Plan. Proposals that relate to the change of use of a substantial building such as a hotel to residential will need to accord with the relevant policies in this plan (RT-D3 Safeguarding Serviced

³⁴² 'Your Future Exmoor' Consultation <http://www.exmoor-nationalpark.gov.uk/planning/planning-policy/local-development-framework/your-future-exmoor>

Accommodation). Any subdivision in this instance will need to ensure that provision to meet local affordable housing need will be maximised consistent with policy HC-S1 Housing.

- 7.144 A condition will be attached to any planning permission removing any permitted development rights granted for extensions by the Town and Country Planning (General Permitted Development) Order 1995, to help retain a range of smaller, lower cost dwelling units. Proposals for extensions that would take subdivided dwellings above 90sqm will not normally be permitted. For existing dwellings with no occupancy tie the new dwelling unit created through the subdivision of the property will be a principal residence dwelling in accordance with policy HC-S5 Principal Residence Housing.
- 7.145 Registered Providers can also play a valuable role in sub-dividing existing properties within settlements to create smaller units of affordable accommodation to help meet the housing needs of the community.

CONSIDERATIONS FOR THE SUBDIVISION OF DWELLINGS

- 7.146 The main considerations will be the impact an additional dwelling may have on the natural and built character of the area as well as impacts on local amenity, and any negative impacts of increased vehicular use. Such considerations are likely to include whether there are sufficient parking arrangements, or private amenity space available and any potential impacts on nearby residents or other neighbouring uses.
- 7.147 Where a building is considered to be of historic or architectural merit, careful consideration will be given to the impact that any proposed alterations may have on the historic character of the building and its setting.
- 7.148 For those dwellings that have a local affordable occupancy tie to restrict the occupancy to person in local affordable housing need, subdivision will only be permitted where sufficient habitable space is created. In such cases the Authority would require the new unit(s) of accommodation to have the same occupancy tie.
- 7.149 Dwellings with an agricultural, rural worker, or succession farming occupancy tie are permitted in the open countryside as an exception and therefore will only be permitted to subdivide to create a new unit of accommodation where the occupancy of the new dwelling unit is for a proven need for a rural worker in accordance with HC-D6, or for a succession farming dwelling in accordance with HC-D7. Other circumstances include where the rural worker occupancy tie is to be replaced with a local affordable occupancy tie (in accordance with clause 2 of HC-D10 Replacement of Rural Worker Occupancy Conditions) and the dwelling subdivided to create local affordable homes of 90sqm net floorspace or less; or where the additional unit(s) created will have a local affordable occupancy tie (HC-S3 Local Occupancy Criteria).

HC-D12 SUBDIVISION OF EXISTING DWELLINGS

- 1. Proposals for the subdivision of existing residential dwellings will be permitted where:**
 - a) There would be no adverse impact on the character of the area, local amenity or highway safety; and**
 - b) Any necessary alterations will not adversely affect buildings of historic and/or architectural merit (CE-S4, CE-D3).**
 - c) Any additional units created will be principal residence housing and subject to a condition limiting its occupancy to a person as their only or principal home (HC-S5).**
- 2. Where a property has a local affordable occupancy tie, any subdivision would require that the new unit(s) created would retain the same occupancy restriction.**
- 3. Proposals to subdivide a dwelling with a rural worker or succession farming occupancy tie will only be permitted where:**
 - a) The occupancy tie is to be replaced with a local affordable occupancy tie in accordance with HC-D10 Replacement of Rural Worker Occupancy conditions clause 2;**
 - b) The additional unit(s) created will have a local affordable occupancy tie in accordance with HC-S3 Local Occupancy Criteria; or**
 - c) The additional unit(s) created is in accordance with the requirements for HC-D6 Rural Workers Dwelling or HC-D7 Succession Farming.**
- 4. Where permission is granted a condition will be attached removing permitted development rights granted by the Town and Country Planning (General Permitted Development) Order 1995 in respect of extensions to ensure that subdivided dwellings of 90sqm or less do not exceed this size, or where the Authority considers the existing dwelling has already maximised the extensions allowance (HC-D13 Residential Extensions).**

RESIDENTIAL EXTENSIONS

CONTEXT

- 7.150 The role of this policy is to provide reasonable flexibility for dwellings to be updated and extended whilst ensuring that the impacts of extensions are acceptable and retain a mix of dwelling sizes that will help to sustain balanced communities across the National Park. The overall size and design of extensions should not be excessive to ensure that the character of the surrounding landscape, individual buildings and settlements is conserved or enhanced.
- 7.151 The National Park Authority will require that extensions are sympathetically designed and proportionate in scale, bulk and form to the original dwelling, consistent with policy CE-S7 Design and Sustainable Construction Principles. For the purposes of this assessment a figure for floorspace increase of 35% will be used and proposals for extensions which individually or cumulatively (taking account of previous extensions including those built with permitted development rights) increase the floorspace of the original dwelling beyond this range are unlikely to achieve the aims of the policy.
- 7.152 For the purposes of implementing the policy, floorspace shall be measured externally and shall include porches and conservatories. The 'original dwelling' is the dwelling as it existed on 1 April 1974 or as constructed if this was a date after 1 April 1974 (this being the date when the discharge of planning responsibilities was transferred to the National Park Committee of Somerset County Council).

- 7.153 Extensions for dwellings that are subject to an occupancy tie to ensure they meet the local community's need for affordable (or more affordable housing) will not be permitted where they would exceed 90sqm net internal floorspace. This is because such homes have been permitted to provide an opportunity for local people, unable to afford to buy a home on the open market, to build their own owner-occupied homes. Together with the local need occupancy tie, the size of these dwellings ensures that these homes remain more affordable for local people in perpetuity.
- 7.154 It is considered that dwellings that are unauthorised or immune from enforcement action, including those that have been granted a Certificate of Lawful Use or Development will not benefit from further enlargement through extensions or alterations. Temporary dwellings, such as those considered to be essential to support a rural land-based business and granted permission for a period of three years, will also not be permitted to extend. In applying this restriction, the Authority is adopting a similar approach to that taken by Dartmoor National Park Authority in their Development Management & Delivery Development Plan Document.
- 7.155 Extension proposals exceeding 35% will only be justified if it can be demonstrated that the extension would significantly enhance the character and appearance of the existing dwelling and its surroundings, and is clearly of the highest quality in terms of its construction and design; or if the extension is a conversion scheme of an existing building that is clearly demonstrated to be within the domestic curtilage.
- 7.156 Changes to permitted development rights have meant that the rules concerning extensions, improvements and alterations a householder can make to their house without the need for a planning application have been altered.³⁴³ Some dwellings may also have permitted development rights withdrawn. Further information can be found on the Planning Portal.³⁴⁴ To avoid doubt, given the variations for permitted development rights within National Parks, applicants are advised to contact the National Park Authority in the first instance.³⁴⁵
- 7.157 In terms of extending the residential curtilage of a property, careful consideration should be given to the impact the change of use of the land to a residential use (e.g. from agricultural grazing land) may have on the surrounding area in terms of its visual appearance in the wider landscape, and its impact on landscape and/or settlement character. Proposals should particularly have regard to the settlement form and the use of traditional boundary treatments that reflect the character of the area.

³⁴³ Town and Country Planning (General Permitted Development) (Amendment)(No.2)(England) Order 2008 and Town and Country Planning (General Permitted Development) Order 1995 as amended

³⁴⁴ www.planningportal.gov.uk

³⁴⁵ Article 1(5) land – land within a National Park, the Broads, an area of outstanding natural beauty, an area designated as a conservation area, and land within World Heritage Sites.

HC-D13 RESIDENTIAL EXTENSIONS

- 1. Proposals for residential extensions will be permitted where they:**
 - a) accord with the principles set out in CE-S7 Design and Sustainable Construction Principles;**
 - b) ensure there is sufficient space within the existing curtilage to accommodate the extension without resulting in overdevelopment of the site or adversely impacting on residential amenity space and parking provision; and**
 - c) are not disproportionate to the original dwelling and in any case do not increase the external floorspace of the original dwelling by more than 35% (taking into account any extensions provided through permitted development rights), and**
 - d) ensure the maintenance or replacement of any bat and barn owl roosts that may be present.**
- 2. Residential extensions will not be permitted in the following circumstances:**
 - a) for dwellings where the size is restricted the proposed extension would exceed the net internal floorspace limitation – including local need affordable dwellings, extended family dwellings, succession farming dwellings, rural land-based worker dwellings and specialist housing for older people –;**
 - b) for temporary dwellings; or**
 - c) for dwellings that are unauthorised or immune from enforcement action – including those dwellings which have had the benefit of a Certificate of Lawful Use or Development.**
- 3. Extensions to residential curtilages will only be permitted where it can be demonstrated to the satisfaction of the Authority that it will not adversely affect visual amenity, the setting of the residential building, and the surrounding landscape and/or settlement character of the area.**

OUTBUILDINGS

CONTEXT

- 7.158 Policy HC-D14 applies to ancillary outbuildings within the domestic curtilage for a purpose incidental to a dwelling such as garages, garden sheds, greenhouses, workshops, and swimming pools. Home offices or stabling that may be proposed within the domestic curtilage should accord with the following policies:
- 7.159 Proposals for buildings for the purpose of home working should accord with policy SE-D1 Home Based Businesses.
- 7.160 Proposals for horse-related development within the residential curtilage, such as stabling and tack rooms, should be consistent with RT-11 Equestrian Development.
- 7.161 It is important that the number, scale and design of any buildings within the curtilage of a dwelling should not detract from the character or appearance of the dwelling, the site and the surrounding area, as the siting and design of outbuildings can potentially be as significant as any other built development. Care should be taken to ensure that the position and design of ancillary outbuildings safeguards the amenity of neighbouring occupiers. Proposals which would reduce the level of private amenity space, including parking provision, around the dwelling to an unacceptable level should be avoided, to prevent issues in the future such as the relocation of private parking to on-street parking in locations where public parking demand is high or where it could interrupt the flow of traffic.
- 7.162 Where the conversion of an existing building is proposed within the domestic curtilage the applicant will be required to ensure that the building's character and appearance is conserved or enhanced in accordance with policy CE-S5 or CE-S6.
- 7.163 The National Park Authority will need to be assured that the loss of existing outbuildings, such as garaging, to other uses will not result in subsequent proposals for additional new outbuildings which may result in adverse impacts on residential amenity and the character and appearance of the dwelling and surrounding area. Planning conditions limiting the use of the outbuilding to purposes incidental to the dwelling on the site will be attached to any grant of planning permission.

7.164 Proposals that aim to provide primary living accommodation such as additional sleeping accommodation or extra living space will be considered under policy HC-13 Residential Extensions.

HC-D14 OUTBUILDINGS

- 1. Proposals for ancillary outbuildings within the domestic curtilage of a dwelling will be permitted where:**
 - a) they are not disproportionate in size in relation 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-S7;**
 - c) in the case of the conversion of an existing building, the character and appearance of the building is conserved in accordance with policies CE-S5 or CE-S6; and**
 - d) private amenity space around the dwelling will not be reduced to an unacceptable level.**
- 2. Any element of the proposal that pertains to primary living accommodation should accord with the requirements of policy HC-13 Residential Extensions.**

REPLACEMENT DWELLINGS

CONTEXT

- 7.165 Applications for replacement dwellings often come forward where an existing dwelling is in disrepair. In many cases such dwellings are of timber construction, modest in size and built prior to the introduction of planning control. Listed buildings or dwellings that are considered to be of historic importance will not be considered for replacement, (CE-S4, CE-D3). The Exmoor National Park Historic Environment Record has an extensive source of information that includes the historic built environment and can provide useful evidence for applicants proposing to replace an existing dwelling. Where the residential use has been abandoned, any proposals will be assessed against policies for new build residential dwellings (HC-D2 and HC-D5).
- 7.166 Applicants should demonstrate that the existing building adversely affects the landscape or built character of the area and is in a substandard condition that is not economic to repair and meet the technical requirements of Building Regulations legislation.
- 7.167 Replacement by a new dwelling of modern building and energy efficiency standards demands particular attention to design and siting (CE-S7 Design and Sustainable Construction Standards) to avoid harm to the landscape and character of the area, including providing vehicular access and establishing a domestic curtilage. The replacement dwelling should be sited on or close to the existing footprint of the building unless the benefits that may be achieved for landscape character, wildlife or cultural heritage can justify the replacement dwelling to be sited in an alternative location. In such situations, locations that are inherently more sustainable will be favoured such as replacing a remote substandard dwelling in the open countryside with a dwelling in a nearby settlement.
- 7.168 The replacement dwelling should be of a similar scale, massing and floorspace as the original dwelling to avoid any adverse harm to landscape character and visual amenity. In terms of policy HC-D15 the 'original dwelling' is the dwelling as it exists at the point of application to the National Park Authority. This approach will help to ensure that a stock of smaller, more affordable dwellings remains in the National Park.
- 7.169 Conditions will be attached to any permission granted to remove permitted development rights in relation to extensions and to ensure that, where the existing building is not demolished prior to construction, it is removed from the site prior to the replacement building being occupied or up to 3 months after first occupation for family homes in accordance with CC-S4 Waste and Resource Management.
- 7.170 Proposals will need to be acceptable in respect of parking and access in accordance with Policies AC-D1 (Transport and Accessibility Requirements for Development) and AC-D2 (Parking Provision and Standards).

HC-D15 REPLACEMENT DWELLINGS

- 1. Proposals for the erection of a replacement dwelling will be permitted where the existing dwelling:**
 - a) is not listed or considered to be of historic importance worthy of conservation;**
 - b) has an adverse impact on the character and visual amenity of the area;**
 - c) is in substandard condition which is not economic to repair; and**
 - d) the residential use has not been abandoned.**
- 2. The proposed replacement dwelling should:**
 - a) be sited on or close to the footprint of the existing dwelling, unless landscape, wildlife or cultural heritage benefits justify alternative siting;**
 - b) not be materially larger than the original dwelling in terms of massing, scale and floorspace; and**
 - c) accord with the design and sustainable construction requirements of Policy CE-S7.**
- 3. Where permission is granted, conditions will be attached to:**
 - a) remove permitted development rights granted by the Town and Country Planning (General Permitted Development) Order 1995 in respect of extensions; and**
 - b) ensure that the existing dwelling is demolished and removed from the site prior to or within 3 months of the replacement dwelling first being occupied.**

TRAVELLING COMMUNITIES

CONTEXT

- 7.171 The accommodation requirements of travelling communities, who include gypsies, travellers and travelling show people are part of the overall accommodation needs to be addressed across a local planning area and need to be considered alongside the housing needs of settled communities.
- 7.172 National Government aims to ensure fair and equal treatment for travellers in a way that facilitates their traditional and nomadic way of life while respecting the interests of the settled community. National planning policy highlights the importance of ensuring that traveller sites are sustainable, recognises that some areas may have special or strict planning constraints and that local planning authorities have a duty to co-operate on planning issues that cross administrative boundaries.
- 7.173 Working collaboratively with neighbouring local planning authorities, authorities should set pitch targets for gypsies and travellers and plot targets for travelling show people which address the likely permanent and transit site accommodation needs of travellers in their area. Where there is no identified need, criteria-based policies should provide a basis for decisions on any applications which may come forward.
- 7.174 In rural areas, local planning authorities should, where viable and practical, consider allocating and releasing sites solely for affordable traveller sites, including using a rural exception site policy for traveller sites to enable the use of small sites in small rural communities that would not normally be used. Such sites should be used in perpetuity specifically and only for affordable traveller sites to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection, whilst also ensuring that rural areas continue to develop as sustainable, mixed, inclusive communities.
- 7.175 An assessment of gypsies and travellers within Devon was completed in 2006.³⁴⁶ The Devon-wide study identified a level of accommodation need and demand for northern Devon. An assessment for Somerset was completed in 2011. It includes a requirement for West Somerset District for five additional residential pitches 2010 to 2020 (two in the period 2010 to 2015 and three 2015 to 2020) and no transit pitches. A need for four additional showmen's yards was identified for Somerset as a whole for the period 2010 – 2020 though none specifically for a particular district including West Somerset. Neither the Devon nor Somerset Gypsy and

³⁴⁶ Southern, Dr Rebekah & James Zoë, Dr Devon-wide Gypsy and Traveller Housing Needs Assessment, Social Research & regeneration Unit, (November 2006, University of Plymouth) and De Montfort University Leicester Somerset Gypsy and Traveller Accommodation Assessment (January 2011).

Traveller Assessments identify a separate site provision target for Exmoor National Park, as there was no demonstrable need for either permanent or transit sites in the National Park.

- 7.176 In planning for traveller accommodation in the National Park, the approach is to, work collaboratively with neighbouring authorities, to seek to establish and positively address the accommodation needs of traveller communities in a way that recognises their traditional and nomadic way of life and respects the interests of the settled community. Because no demonstrable need was identified within the National Park, this Plan includes a criteria based policy and does not include pitch or plot targets or sites.
- 7.177 As a result of concerns over the landscape impacts of residential caravans or mobile homes in a National Park, if a local need for traveller sites is identified, the policy seeks to accommodate that need outside the National Park and the National Park Authority will work closely with neighbouring authorities to achieve this. Nevertheless, this Local Plan sets out an approach which acknowledges that exceptional circumstances might justify small scale provision. Consistent with the conservation and enhancement of the National Park duty to local communities, and the overall approach to housing in Exmoor, a rural exception site policy approach will be used to seek to address the proven needs of the local community for small traveller sites where they can be accommodated without harm to the National Park and in accordance with the spatial strategy in GP4 well related to existing buildings in or adjoining settlements. The Exmoor Housing SPD will provide further guidance, including on assessment of local connection. Assessment of landscape impact will be required including to take into account the variations in tree and hedgerow cover through the seasons and a landscaping scheme to ensure a development is screened effectively.
- 7.178 The policy requires that a site should respect the principles of sustainable development, and not result in undue pressure on local infrastructure and services. This will include the provision of suitable water and sewerage infrastructure to ensure there will be no adverse impacts on water resources or air quality. Identification of sites will need to consider flood risk issues as caravans are classed as a vulnerable form of development and proposals will therefore need to accord with Policy CC-D1 (flood risk).
- 7.179 Although the principles of the Policy set out in this draft Plan are considered to be appropriate, including in the context of a National Park, traveller accommodation assessments are due to be reviewed in both Devon and Somerset. The National Park Authority is therefore working with neighbouring local authorities to commission updated traveller accommodation assessments to provide evidence to inform the Local Plan. These are likely to include specific figures by district for the level of provision and incorporate figures for Gypsy and Traveller Pitches (transit / permanent) and Travelling Show people plots (transit / permanent). The approach to traveller accommodation, working with neighbouring authorities, will be subject to review, potential change and consultation if updated evidence indicates that this is necessary and appropriate.

POLICY HC-S6 TRAVELLING COMMUNITIES

- 1. To ensure that the travelling communities' traditional and nomadic way of life is recognised, where an identified need for caravans or mobile homes for travelling communities can be demonstrated, the National Park Authority will work with the relevant housing authorities to appropriately address that need. Exceptionally, small sites may be permitted where:
 - a) there is a proven local need for a site to accommodate the affordable need of travelling communities who have a proven local connection through employment, longstanding residency or family, in the parish or adjoining parish;**
 - b) there are no suitable sites that can meet the need outside the National Park boundary;**
 - c) the site will respect the principles of sustainable development, be located in a settlement in accordance with GP4, well related to existing buildings and will conserve or enhance the settlement character and pattern, be accessible to appropriate health and educational facilities and not result in undue pressure on local infrastructure and services;**
 - d) the need can be met without an adverse impact on wildlife and the landscape and the application is accompanied by a landscaping scheme that secures effective screening of the caravans or mobile homes;**
 - e) the interests of the settled community will be respected;**
 - f) the site will be affordable to local travelling communities and will remain so in perpetuity; and**
 - g) A planning obligation is secured to ensure that occupancy of the site is confined to persons in local need of accommodation in perpetuity.****

COMMUNITY SERVICES AND FACILITIES

Objective 9. *To maintain and improve the recreational opportunities in the National Park particularly the rights of way network, access to open country, other quiet and active recreation based on Exmoor's special qualities; and ensure that opportunities for recreation can be enjoyed by people from all backgrounds and of all abilities.*

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

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

PURPOSE OF THE POLICIES

- 7.180. Policies HC-S7, HC-D16, HC-D17, and HC-D18 set out the approach towards helping communities across the National Park by enabling provision of new local services and community facilities in sustainable locations whilst safeguarding existing services and retaining open space that is visually important to local communities.
- 7.181. The National Park Authority through its role as local planning authority can manage the overall direction and type of development and land use through policies within the Local Plan. The Partnership Plan sets out three key priorities which relate to the vision and objectives that are shared with the Local Plan. A number of strategic activities and associated actions have been agreed with partner organisations which go beyond land use planning that can deliver a wider range of benefits that help to achieve the statutory purposes and the social and economic well-being of local communities.
- 7.182. The National Park Authority recognises the important role of community services and facilities within Exmoor communities and for those who visit the National Park and is supportive of maintaining and enhancing their provision. The Authority will seek to work with County Councils, District Councils, Parish & Town Councils and local communities to achieve this objective.
- 7.183. Neighbourhood Plans and Neighbourhood Development Orders have been introduced by the Localism Act and enable communities to have a greater role in how they evolve over the longer term. The Authority will support those communities, who wish to develop a Neighbourhood Plan, and work with other communities, to produce community led plans or proposals that are compatible with the Local Plan policy approach (see ES-S1 Supporting Local Communities).

NATIONAL POLICY CONTEXT

- 7.184. National policy³⁴⁷ aims to ensure strong, vibrant, healthy and inclusive communities with accessible local services that reflect the community's needs by planning positively, to retain (or safeguard), and develop the range of local social, health, recreational and cultural facilities and services, to help to meet the day to day needs of local communities.
- 7.185. Whilst guarding against the loss of services and facilities, existing shops, services and facilities should be able to develop and modernise in a sustainable way so that they can be retained for the benefit of the community.
- 7.186. The National Parks Circular recognises that National Parks offer community cohesion and are exemplars in achieving sustainable development that helps rural communities to thrive. The circular highlights that rural economies of National Parks should be fostered and maintained, and to be aware of the sectors and activities which are most likely to sustain their communities.

CONTEXT

- 7.187. Evidence has shown that for a rural area with small settlements, Exmoor National Park already supports a comparatively strong and diverse commercial services sector, such as shops, cafés and restaurants, and retains a range of other important services and facilities

³⁴⁷ National Planning Policy Framework

such as schools, doctors' surgeries and petrol stations. Problems associated with the provision of services in rural areas is well documented with the loss of services such as shops, post offices, pubs, schools and petrol stations within local communities and where there are low levels of public transport provision. Despite such problems, Exmoor benefits from active and dedicated communities that work together to achieve positive benefits including community-run shops at Wootton Courtenay and Brompton Regis and the refurbishment of Bridgetown village hall by local residents. Community and parish plans have emphasised the importance of services and facilities in their settlements.

- 7.188. There is a high level of support for retaining existing community services, including out-reach services, and facilities in communities, with flexibility to ensure that a range of services can continue to be provided e.g. in a single premises. The need for improving and providing for open space and recreation facilities in communities is also evident. Some settlements on Exmoor link together in terms of the collective services and facilities they provide – communities can become stronger and more resilient when they operate as a cluster or network in order to sustain or develop joint facilities in the most sustainable location.
- 7.189. Without local service provision, some older people, people with disabilities or limiting long term illnesses, and those without access to private transport³⁴⁸ often have to move to surrounding towns for their transport, care needs and access to services; those who remain can become excluded from many social activities. Access to services and facilities tends to be difficult for those without access to private modes of transport. Health and social welfare issues are a priority in dispersed rural areas such as Exmoor. An increasingly older population is likely to put pressure on local social services and healthcare, whilst the viability of other services, such as local schools may be threatened – other policies in this plan will help to meet the affordable housing needs of the local community and key workers including those of older and vulnerable people in need of specialist housing (HC-S1 Housing).
- 7.190. Across most of Exmoor, the local service sector is dominated by local independent traders. The National Park's Local Service Centres: Dulverton, Dunster, Lynton/Lynmouth and Porlock are settlements with most shops and services. None of the Local Service Centres has a population above 2000, but have high levels of both convenience (food) and comparison (non-food) shops and they all support a range of relatively high value shops selling art and crafts, clothing, outdoor gear, and gifts. These shops are complemented by pubs, cafés, and restaurants. This is a consequence of both visitor spend and also relative remoteness from larger towns, and the consequent reliance of local communities, including surrounding villages, to access the range of shops and services available. These two factors reinforce each other as, for example, convenience stores will be bigger and offer a wider range of goods because of additional visitor spend which also benefits residents. This in turn supports jobs and has a positive knock-on effect for the local economy. In addition, tourist expenditure can help to support (and keep open) shops and services which may not be supported by local residents' expenditure alone.
- 7.191. Other settlements in the National Park are dispersed and their residents are generally relatively remote from larger settlements outside of the National Park. This appears to have enabled the retention of local services such as shops, post offices, pubs and petrol stations. Exford is a good example, with a post office, a separate village shop and a range of other modest services. Both its distance from larger centres and its tourist trade has supported local service provision well above what might be expected for a settlement of this size. This aspect of the National Park's settlements is important for local communities and visitors, and helps to protect and enhance local services. With limited public transport infrastructure, the private car is important to many for shopping and accessing local services and facilities on Exmoor. Whilst this will continue in the future, rising fuel prices may influence the choices people make about where they go to shop. This could lead to an increase in internet shopping, although it could also offer an opportunity for local services to offer a greater range of goods to those people who wish to do more shopping locally.
- 7.192. The importance of internet shopping across Exmoor has been highlighted through consultation³⁴⁹. Beyond the internet only companies already selling products online, more

³⁴⁸ 2011 ONS Census data – 28.2% of households with at least one person with a long-term limiting illness, 11.8% of households do not have a car/van

³⁴⁹ Your Future Exmoor: Found that 23% of those people responding to the consultation used the internet twice a month or more frequently for shopping (with 39% using the internet once a month or less and 38% never using the internet for shopping).

and more existing ‘bricks and mortar’ retailers are increasing their online sales. In addition, and most importantly, national grocery retailers are continuing to extend their internet shopping home delivery services. However, the ability to use the internet for shopping can depend upon internet access and the speed of broadband connections. Planned investment in broadband infrastructure (AC-S4 Electricity and Communications Networks) could encourage more internet shopping. However, evidence suggests that Exmoor’s older population may prefer to shop locally not least for the social benefits this also provides.

- 7.193. Schools, including pre-schools, are an essential community service important for child and family well-being and a focal point where people regularly interact. They also provide a venue for extended services, and offer facilities such as sports fields/pitches for community use. Although in recent years, there have been no school closures on Exmoor (the last being Winsford First School in 1996), the number of schools in the National Park is lower than it was in the past. There are six first schools, two primary schools and a middle school in the National Park and the current network of education provision helps to reduce the distance children have to travel particularly at a young age.
- 7.194. Communities across Exmoor have benefitted from funding support through Carbon Neutral Exmoor³⁵⁰ to incorporate renewable energy and energy efficiency technologies on community buildings as part of a transition to low carbon living. Proposals for community renewable energy schemes will be encouraged where they accord with policy CC-S3 Renewable Energy.
- 7.195. A high level of support was demonstrated³⁵¹ for the protection of local services as well as, for multi functional uses of services and facilities to increase the viability of services at risk of closure. Although, policies in this plan cannot ultimately protect against the loss or closure of community services and facilities, they can manage what the former use may change to in the future. Community action and setting up not-for-profit enterprises have been significant in maintaining key services and facilities in some Exmoor communities.
- 7.196. The provision of new or extended community services and facilities is supported within local communities where it is demonstrated to meet the needs of those communities and rural residents – this could be through a community-led or parish plan. Proposals which represent community views or are proposed on behalf of the community will be taken into account in demonstrating the need for a new or extended service or facility.
- 7.197. Proposals which reuse existing buildings (policies CE-S5 and CE-S6) or support a mixed/multipurpose service or facility will be encouraged to maintain service provision and community cohesion. Preference will be given to the conversion of traditional buildings (policies CE-S5 Principles for the Conversion of Traditional Buildings and CE-S4 Cultural Heritage) however where this is not possible the conversion and change of use of non-traditional buildings will be considered (policy CC-S6 Principles for the Conversion of Non-traditional Buildings). New community facilities such as village halls should be designed to ensure that wider community service provision such as ‘out-reach’ services and flexible meeting spaces to serve local groups and societies can take place. The medical centre in Dulverton that opened in 2009 has enabled the GP practice and dental surgery to be located in one building with capacity for external health practitioners. In all cases, proposals will need to demonstrate that flood risk has been considered to accord with Policy CC-D1 (flood risk).
- 7.198. The Exmoor National Park Open Space Strategy provides an assessment of the amount, distribution and quality of existing open amenity space within communities across the National Park; including:
- a) Parks and gardens (including designed landscapes)
 - b) Outdoor sports facilities
 - c) Provision for children and young people
 - d) Allotments

³⁵⁰ Carbon Neutral Exmoor (phase 1) is a 3 year project that has been instigated by Exmoor National Park Authority - additional funding has been secured through the Rural Development Programme for England Local Action for Rural Communities Programme from the Torridge and North Devon Local Action Group and the Western Somerset Local Action Group. Capital funding of £400k for projects has been secured through the Department of Climate Change’s ‘Low Carbon Communities Challenge’

³⁵¹ Your Future Exmoor Consultations 2008-2010

- e) Churchyards and cemeteries
- f) Green corridors
- g) Amenity green space

- 7.199. Policies HC-S7, HC-D16 and HC-D17, support the provision and retention of new outdoor recreation areas and publicly accessible amenity spaces (as listed above) and the retention of existing outdoor recreation and amenity areas as identified on the Proposals Map. When submitting an application for additional open amenity space and outdoor sport and recreation facilities, the need for such development within the named settlements should be established through the evidence provided within the Exmoor National Park Open Space Strategy or other sources of evidence including community related information. Communities can also designate 'local green space'³⁵² through the preparation or review of a Local Plan or Neighbourhood Plan. This designation can only be used where:
- a) the green space is in reasonably close proximity to the community it serves;
 - b) the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
 - c) the green area concerned is local in character and is not an extensive tract of land.

QUESTION: Is there an area within the named settlements (see policy GP4) which you wish to put forward as a 'local green space' which is not already protected by other designations shown on the Proposals Map, and where the area meets criteria a) – c) above?

- 7.200. Policies HC-S7, HC-D16 and HC-D17 seek to provide for local commercial services and community facilities and safeguard existing services and facilities in villages and towns on Exmoor – these include those defined by the 'A' and 'D' use classes for:
- a) A1-A5 uses which includes local commercial services that serve Exmoor communities and visitors to the National Park and include shops (together with community shops), public houses, cafés, restaurants and takeaways;
 - b) D1 non-residential institutions e.g. health centres, day nurseries, schools, libraries, places of worship, village/ community halls and
 - c) D2 assembly and leisure e.g. indoor/outdoor sports and recreation facilities, cinemas and gyms.
- 7.201. The policies also apply to some *sui generis* uses (a use 'on its own' for which any change of use will require planning permission) within settlements and include petrol stations, public toilets, police stations, fire stations and public amenity spaces.

³⁵² National Planning Policy Framework (2012) paras. 76-78

HC-S7 LOCAL COMMERCIAL SERVICES & COMMUNITY FACILITIES

1. The National Park Authority will work with constituent local authorities, Parish & Town Councils and communities to ensure that Exmoor's communities are sustained, the economy strengthened, and the needs of visitors addressed. The provision of new or extended local commercial services and community facilities will be supported where it can be demonstrated that they:
 - a) will benefit the local resident community and the needs of visitors; and
 - b) Are of a scale and location appropriate to the community they serve.
2. The improvement of existing services and facilities will be encouraged, particularly where enhancement of service provision is achieved.
3. For new developments or extensions to existing premises, preference will first be given to the reuse of existing traditional buildings (CE-S5). The reuse of non-traditional buildings (CE-S6), if enhancement of the built and natural environment can be achieved (GP6), may be considered.
4. New build developments should be located within the Local Service Centres and Villages or, for community facilities where no suitable site exists, are well related to these settlements and their setting. Within Rural Communities, community services and facilities will only be permitted through the change of use of an existing building, or for the provision of public open space. Proposals specifically for new build and ancillary local commercial services should also be in accordance with the tests set out in Policy HC-D16 Local Commercial Service Provision.
5. Proposals enabling the shared or flexible use of new or existing buildings to allow a range of community services or facilities to take place on site will be supported – where this applies to an existing service the sharing of facilities should support the retention of the primary use.
6. The provision of publicly accessible green space will be supported where it benefits the local community.
7. Local commercial services and community facilities will be safeguarded unless there is evidence to clearly demonstrate that a suitable replacement service or facility is provided, it is no longer viable, or no longer needed by the community (HC-D17).
8. Important visual amenity space identified within and adjoining the settlements will be safeguarded (HC-D18).

NEW LOCAL COMMERCIAL SERVICE PROVISION**CONTEXT**

- 7.202. Local Plan Policy HC-D16 provides a basis for new build local commercial services (A class uses), including modest scale improvements and additions, in the named settlements where proposals are of a scale, design and nature that accords with the character of the area ensuring that the design of a proposal, including any proposed shop front, conserves and enhances the building and its locality, that it will compliment the existing range of such services and will not undermine the existing centres of settlements. In reality, evidence³⁵³ shows that there is limited available expenditure to provide for a significant growth within this sector.

LOCAL SERVICE PROVISION IN LOCAL SERVICE CENTRES AND VILLAGES

- 7.203. Policy HC-S7 supports, the reuse of existing buildings, and therefore in principle, may also include those buildings with an existing use including residential (with the exception of local need affordable housing), to enable a change to a local commercial service. The proposal should also accord with other policies in this plan and demonstrate that there are no other suitable, available, existing premises in the locality. In order to encourage entrepreneurship,

³⁵³ Quantitative Needs Assessment 2011

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

- 7.204. In some circumstances, Exmoor National Park Authority may require submission of an impact assessment for any proposed local commercial service provision. The objective of an impact assessment is to measure and, where possible, quantify the impacts of proposals. In the case of small scale commercial services or extensions to existing services, an impact assessment may not be appropriate. However, applicants should seek advice from the National Park Authority at an early stage to agree the need, scope for and level of detail of impact assessments in advance of applications being submitted. Key factors of an impact assessment should include the following:
- a) the need for the development,
 - b) the scale of development,
 - c) impacts of the development on trade, vitality and viability of the settlement and nearby centres and the degree of overlap, in terms of the range, type and quality of goods available, between the proposed development and other local commercial service uses both within the proposed settlement and if appropriate, nearby centres.
- 7.205. Proposals will need to demonstrate that flood risk has been considered to accord with Policy CC-D1 (flood risk).
- 7.206. In considering all new local commercial services, Exmoor National Park Authority may use conditions to manage the impacts of development including to:
- a) prevent developments from being sub-divided into a number of smaller units;
 - b) ensure that ancillary uses remain subservient to the existing use within the development;
 - c) limit any internal alterations to increase the amount of gross floorspace by specifying the maximum floorspace permitted;
 - d) limit the range of goods sold, and to control the mix of convenience (food) and comparison (non food) goods;
 - e) guard against adverse issues relating to traffic resulting from the development; and
 - f) guard against adverse impacts of the operation of the development on the amenity of neighbouring residents, such as the timing of the delivery of goods to shops and adequate provision for loading and unloading.
- 7.207. Where new local commercial services are granted planning consent, permitted development rights may be withdrawn to ensure that temporary changes of use³⁵⁴ will not apply in these circumstances. This is because this measure was introduced to contribute to the viability and vitality of town centres. It could however result in the loss of services and facilities in smaller settlements such as those within the National Park where in many cases there may be very few or even one remaining service such as a shop. The national change does not therefore fully reflect the role of services within a sparse rural area such as Exmoor National Park, where the retention of local services is essential to community well-being.

LOCAL COMMERCIAL SERVICES IN THE OPEN COUNTRYSIDE

- 7.208. Commercial services in the open countryside include farm shops selling local produce; such businesses can also provide for the needs of local communities which may offer a different range of goods from other shops nearby or provide a service where a village shop may not be viable. Farm shops which sell goods produced on the farm do not normally require planning permission as long as, in addition to goods produced on the farm, they sell only a small percentage of imported goods (typically 10%). A judgement will need to be made in determining whether the scale and proportion of imported goods amounts to a retail use requiring planning permission on a case by case basis. Where it is the National Park

³⁵⁴ Statutory Instrument 2013 No. 1101 The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2013. Part 4 of Schedule 2 to the General Permitted Development Order grants planning permission in respect of certain temporary buildings and uses.

Authority's view that planning permission is required, then applications will be assessed against policy HC-D16.

- 7.209. The policy also allows for other services that may require a location outside the named settlements including cafés and shops that are associated with visitor facilities, craft workshops, or camping/caravan sites. The provision of small-scale services in the open countryside should accord with the principles set out in SE-S3 Business Development in the Open Countryside to ensure a consistent approach with other forms of business development outside the named settlements. Applicants should demonstrate that the provision of these services will support the function of the existing business and will not adversely affect similar service provision within nearby settlements.

MOBILE TRADING

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

HC-D16 LOCAL COMMERCIAL SERVICE PROVISION

1. **Proposals for new build, extensions or change of use of buildings for local commercial service provision within Local Service Centres and Villages will be permitted where:**
 - a) **the proposed location contributes to the overall vitality of the settlement and the local economy and the proposal cannot be accommodated within sites/buildings which already have planning permission;**
 - b) **they will not adversely affect the locality, National Park, or the amenity of nearby residents as a result of traffic or parking (AC-D1);**
 - c) **if required by the National Park Authority, an impact assessment has been submitted, the scope of which has been agreed prior to submission; and**
 - d) **they are in accordance with CE-S2 Biodiversity, CE-S7 Design & Sustainable Construction and CE-D4 Advertisements.**
2. **Within Rural Communities only extensions to existing local commercial services or the change of use of buildings for local commercial service provision will be permitted in accordance with 1 a) to d) above.**
3. **Proposals for new local commercial service provision in the open countryside, through the reuse of existing buildings, will only be permitted in accordance with SE-S3 Business Development in the Open Countryside, and where:**
 - a) **they are small scale ancillary retail development/ operations principally offering for sale goods which are produced at the premises; or**
 - b) **they principally comprise the sale of crafts and goods made on site, or shops and/or cafés which are ancillary to farms, visitor facilities, or camping and caravan sites; and**
 - c) **they will not have adverse impacts on adjoining land uses; and**
 - d) **it can be demonstrated that they will not adversely affect service provision in nearby settlements; and**
 - e) **they are in accordance with CE-S7 Design & Sustainable Construction and CE-D4 Advertisements.**

SAFEGUARDING LOCAL COMMERCIAL SERVICES & COMMUNITY FACILITIES

CONTEXT

- 7.211. Policy HC-D17 seeks to safeguard both local commercial services including shops, cafés and public houses and community facilities as outlined in paragraphs 7.200 and 7.201 for their role in providing services and facilities for communities and visitors and to safeguard their important role in providing local employment. The Localism Act has enabled communities to have a greater role in helping to sustain and continue services and facilities that are important to them.
- 7.212. In a dispersed rural area such as Exmoor, the availability of community services and facilities helps to reduce the need to travel longer distances (see also policy AC-S1 Sustainable Transport), and therefore services should be safeguarded over the longer term.
- 7.213. Policy HC-D17 sets out criteria and a test of viability to enable the National Park Authority to assess a number of factors when determining a proposal for a change of use which may result in the loss of a service or facility. The policy also contains criteria against which proposals for change of use for specific uses within use classes will be considered. Any proposals for the change of use of local services and community facilities should provide evidence to demonstrate there is no longer a need for a specific service or facility in the longer term, a suitable replacement service or facility is provided, or there is an existing similar facility accessible to the local community. Where a replacement service or facility is to be provided, a planning obligation will be used to ensure that the replacement facility is secured at an appropriate time in relation to changing the use of the existing facility. The representative views of the community will be taken into account in determining any proposals for the change of use of a community service or facility. Uses which are deemed to benefit the community will be considered favourably including other community uses, local affordable housing, or employment use.
- 7.214. In relation to clause 1d) of policy HC-D17 local commercial services such as shops, pubs (A class uses) or petrol stations (sui generis) will be required to demonstrate that all appropriate measures, including the opportunity for community not-for-profit schemes, have been taken to improve viability of the service before a change of use is proposed. It may be that the community would wish to consider taking over the business to be run as a community led-enterprise as at Wootton Courtenay Villagers' Stores. Such initiatives and alternative approaches can enable a facility to remain open. Diversification of local commercial services may be considered to support the viability of businesses. Where the diversified use is incidental to the main use of the business and is of a nature and scale that compliments the current use, the National Park Authority is likely to be supportive of proposals. For example, some shops have diversified from solely retail to also provide refreshment facilities. Conditions may be attached to any granting of planning permission to ensure that the diversified use remains ancillary to the main business (policy HC-S7 supports shared services and flexible arrangements to enable the diversification of services).
- 7.215. The viability tests set out below will be used to assess whether a commercial community service or facility can be made viable, and will require evidence of realistic marketing at a reasonable price. To provide impartial evidence regarding viability and marketing of the property an independent valuation is likely to be required by the District Valuation Office to inform the decision-making process.
- 7.216. Where it can be demonstrated that a local commercial service (A class uses) is no longer viable and the case for a change of use is accepted on grounds of viability and in accordance with HC-D17, the National Park Authority will prefer, particularly for shops (A1 use), that they remain in an alternative 'A' class use or otherwise a change of use to:
- a) D1 or D2 uses will be favourably considered - if this is not possible then;
 - b) other compatible employment uses (B1a - offices) may be permitted; or
 - c) where it can be demonstrated that A, D1, D2 or B1a uses or another community use are not possible, a change of use to affordable housing to meet local needs in accordance with policies HC-D1 Conversions to Dwellings in Settlements and HC-D4 Conversions in the Open Countryside may be permitted.

- 7.217. In order to ensure that the above priorities are achieved, where only a part of a building is occupied by a commercial service and it is accepted by the National Park Authority as being unviable, a change of use to an extension of the existing dwelling will only be allowed if it can be clearly demonstrated that it is not possible for the commercial part of the building to operate independently of the main house; for example where the only means of access to the house is through the part of the building occupied by the commercial service.
- 7.218. Applicants considering the change of use of a site or building from a local commercial service under policy HC-D17 are encouraged to contact the National Park Authority at an early stage to discuss any proposals. The proposal will need to demonstrate that all possible options to improve the viability and sustainability of the service/business have been explored and that the marketing of the land or buildings has resulted in no reasonable offers of purchase before considering applying for change of use.
- 7.219. The National Park Authority will assess any proposals using the viability tests set out in the checklist below which are informed by the Campaign for Real Ale (CAMRA) Public House Viability Test 2004 and may be used to assess whether or not a commercial community service or facility can be made viable under policy HC-D17:
- a) Business viability – evidence of how the business is managed, whether the service has been run successfully in the past, and any attempts to ensure viability. Are there other circumstances affecting viability such as business rates/taxes/rents, and have reasonable attempts to obtain funding or grants been made?
 - b) Location - - in terms of whether it lies within a named settlement or in the open countryside.
 - c) Trade Potential – what is the catchment area, community use and impact of tourism?
 - d) Accessibility - the availability and frequency of public or community transport services in the area, and whether there is access to appropriate car parking nearby.
 - e) Competition - whether there are any other facilities offering a similar range of goods within a convenient distance, and the potential to cater for different groups.
 - f) Flexibility - has the flexible/multiple use and scope of the site for extensions or extending service provision been investigated, and is the facility well maintained?
 - g) The Sale - has the service/facility been marketed/investigated in terms of its potential for other uses permitted by the GPDO³⁵⁵ and cannot be made viable? Is there evidence of realistic marketing of the service/facility at a competitive price for a period of 12 consecutive months that reflects recent trading? A longer marketing period may be required if the market is stagnant. This period may have the added benefit of allowing communities time to develop community led proposals.
- 7.220. In relation to Clause g) above the marketing steps and evidence that the National Park Authority would require include the following:-
- a) The applicant/owner has advertised the premises on site and in local newspapers, estate/property agents (including with specialist trade agents) and, where appropriate, the District Council's sites and premises register and otherwise as requested by the National Park Authority.
 - b) If the applicant/owner is considered to be a willing seller and has failed to provide a willing buyer/occupier in the first three months of marketing they have re-advertised the premises in the aforementioned publications at three month intervals thereafter.
 - c) The applicant/owner has provided the National Park Authority with advertisement details, including sales particulars with a guide price to reflect the market value of the site/building(s).
 - d) The National Park Authority has been provided with written evidence of all enquiries received and the reasons why potential buyers/occupiers found the site/buildings unsuitable.
- 7.221. Proposals will need to demonstrate that flood risk has been considered to accord with Policy CC-D1 (flood risk).

³⁵⁵ Town and Country Planning (General Permitted Development) Order 1995

HC-D17 SAFEGUARDING LOCAL SERVICES AND COMMUNITY FACILITIES

1. Proposals to change the use of land or buildings from a local commercial service or non-commercial community facility will not be permitted unless it can be clearly demonstrated that:
 - a) There is no longer a need for the specific service or facility within that use class and it is not needed by the community over the longer term; and
 - b) A need for other permitted uses within the same use class or other services and facilities has been explored and is not required; or
 - c) A replacement service or facility accessible to the local community of at least equivalent standard is provided; or
 - d) In the case of local commercial services they cannot be continued and made viable over the longer term.
2. In the case of publicly funded/non-commercial services, including schools and libraries, tests 1 a), b) and c) will only apply. Where the tests for a change of use set out in clauses 1 a), b) or c) are met, favourable consideration will be given to changes of uses which benefit the community and the local economy where they otherwise comply with policies in this Plan.
3. In respect of 1 c), planning conditions or obligations will be used to ensure that the replacement provision is secured at an appropriate time in relation to the redevelopment of the site/building.
4. In Local Service Centres changes of use from an existing local commercial service in the A use class to another commercial service in the A use class will be permitted providing they will have an acceptable impact on neighbouring uses.
5. In respect of 1 d) proposals for the change of use of local commercial services and facilities other than those in the A use class in the Local Service Centres, will need to provide detailed evidence to demonstrate that:
 - a) all available opportunities of grant funding and financial support to help retain the service or facility on the premises have been fully explored;
 - b) diversification is not suitable or viable;
 - c) opportunities for community/voluntary not-for-profit service provision have been investigated; and
 - d) realistic marketing of the site or premises at a reasonable value for the current permitted use class for a minimum period of 12 consecutive months has occurred.
6. Where the case for a change of use is accepted on grounds of viability:
 - a) favourable consideration will be given to 'A' 'D1' or 'D2' uses before
 - b) other compatible employment uses (B1a) may be considered, or otherwise
 - c) it can be demonstrated that the change of use to A, D1, D2 or B1a uses or another community use are not possible, a change of use to affordable housing to meet local needs in accordance with policies HC-D1 or HC-D4 may be permitted.

IMPORTANT VISUAL AMENITY SPACE

CONTEXT

- 7.222. The Exmoor National Park Landscape Character Assessment identifies landscape character types and areas across the National Park (see policy CE-S1 Landscape Character). At a more local scale, there are smaller areas of land that have a landscape value to communities and the settlements they live in³⁵⁶. The Local Plan identifies land of visual amenity value within and adjoining settlements, which recognises the significance these green areas have to the setting of buildings and other features, and their importance to the overall character of a settlement. These are different to areas in settlements which are considered to be recreational, amenity and public green space that are open to everyone to use are defined as important open space for recreation and dealt with in the previous policies HC-S7 and HC-D17.
- 7.223. Land of visual amenity value may form a focal point for a settlement, or may be significant in allowing views into and out of settlements in the wider landscape. Other areas are important in terms of historic landscape characteristics or for cultural reasons. These green areas are not always publicly accessible, but may be on occasions such as when a local event is held.
- 7.224. Important visual amenity spaces were identified by local communities as part of the 1997 Local Plan Review and the Local Plan 2001 – 2011, and continue in this Local Plan. At each stage, public consultation has identified further areas for consideration which have then been assessed using the criteria outlined below, and included where it was demonstrated that such areas positively contributed to settlement character. The Landscape Assessment of Important Visual Amenity Space³⁵⁷ outlines and reviews the specific green areas identified in individual settlements to provide evidence for this designation.

QUESTION: Additional areas of Important Visual Amenity Space have been identified through the Your Future Exmoor (YFE) consultation³⁵⁸ which meet one or more of the criteria set out below and are identified on the Settlement Inset Maps (as Important Visual Amenity Space YFE). Do you agree with these additional areas being designated as Important Visual Amenity Space? Please give reasons why you support or object to particular areas.

- 7.225. These areas are primarily identified for their significance within and adjoining Exmoor's settlements but they also contribute to a green infrastructure network (CE-S3 Green Infrastructure) that can provide ecosystem services such as linkages between habitats and sites, positive benefits for the health and wellbeing of local communities and visitors, and enhance the overall environmental quality of settlements.
- 7.226. The selection of those local landscapes or green areas are based on those identified by communities through consultation and considered to be important to settlement character has been undertaken by a professional landscape architect using a set of identifiable criteria. The criteria used for the assessment are summarised below:
- a) Sense of Arrival/Place: a core area usually in association with community facilities.
 - b) Potential Arrival Spaces at the fringes of settlements which could act as future core spaces and which should be protected from development.
 - c) Screening/Setting: areas containing trees and shrubs which provide a contrast in texture to a building mass.
 - d) Breaks in Settlements: areas that break up settlements into smaller neighbourhood areas and reduces the impact of buildings in the landscape.
 - e) Cohesion with Countryside: areas that physically or visually connect with the surrounding countryside such as riverside corridors, woodland or farmland.
 - f) Countryside Experience: remnants of countryside within settlements which help to reduce the urban and increasingly suburban character of rural settlements.

³⁵⁶ Landscape Character Assessment Guidance – Natural England & Scottish Natural Heritage 2002

³⁵⁷ Landscape Assessment of Important Visual Amenity Space – 2012 Update

³⁵⁸ Identified as important green space at the Your Future Exmoor events held during Jan – Mar 2010

- g) Visual Experience: important in providing an alternative visual experience to enclosed spaces as many of Exmoor's settlements are enclosed, tucked into valley bottoms, sunless and with no long views.
- h) Areas of Historic and Cultural Significance which have historically been used for activities such as markets, fairs or meeting places including notable historic events, or areas which add to the historic context of buildings
- i) Use: current use of space will be considered and sites used informally by the public will have greater value e.g. for informal dog walking³⁵⁹.

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

HC-D18 IMPORTANT VISUAL AMENITY SPACE

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

³⁵⁹ Landscape Assessment of Important Visual Amenity Space – 2012 Update

RESIDENTIAL INSTITUTIONS

PURPOSE OF THE POLICY

- 7.228. Policy HC-S8 supports in principle, the reuse of existing buildings across the National Park as residential institutions. This may include residential care homes and nursing homes that could help address a local need for specialist accommodation given the increase in the proportion of Exmoor's population over retirement age, or residential educational facilities to promote the understanding and enjoyment of the National Park and its special qualities.

NATIONAL POLICY CONTEXT

- 7.229. The housing needs of older people include the full range of retirement and specialist housing for those with support or care needs (see also HC-D3). National policy³⁶⁰ states that local planning authorities should work with other authorities and providers to assess the quality and capacity of infrastructure for social care and take account of and support local strategies to improve health, social and cultural wellbeing for all.

CONTEXT

- 7.230. Residential institutions are defined under the Use Classes Order³⁶¹ as class C2 as 'residential accommodation and care to people in need of care', such as residential schools, hospitals and nursing homes.
- 7.231. Government policies encourage care in the community to help people remain independent within their own homes and communities³⁶². This national policy approach may have had some bearing on the closure of care homes in Lynton and Lynmouth. However, it is important to ensure that there is a policy framework to provide for a range of specialist residential accommodation should the need for it be necessary.
- 7.232. Proposals for residential education facilities that promote the enjoyment and understanding of Exmoor and its special qualities will be favourably considered where they can be demonstrated to be in accordance with policies in this plan.
- 7.233. Consistent with the approach for the provision of hotels and guesthouses (RT-S1), new residential institutions should be provided through the reuse of existing buildings as they are a means of achieving new residential institutions without the need to build new premises. This approach is considered to be more appropriate in a National Park where the priority is to minimise building on greenfield land, given the potential scale of such development. Suitable buildings include former hotels and Policy RT-S3 clause 1 provides some flexibility to change their use to other employment premises including residential institutions. The conversion and structural alteration of buildings should accord with the principles set out in policies CE-S5 or CE-S6 depending on whether the existing building is considered to be 'traditional' or 'non-traditional'. Care should be taken with the conversion and structural alteration of buildings, particularly physical changes such as car parking, fire escapes, and extensions that can have a detrimental impact on the character of the building and its setting. For buildings identified as a heritage asset or within a Conservation Area, policies CE-S4 and CE-D3 will also apply. To ensure the conservation and enhancement of biodiversity, proposals shall accord with Policy CE-S2. Proposals for extensions to new or existing residential institutions should accord with policy CE-S7 Design and Sustainable Construction Principles.
- 7.234. Residential institutions such as care homes should be integrated into the local community to enable access to essential facilities including health services, shops, bus routes, community services, and libraries. Such considerations and location will be a key factor in marginal decisions unless a case can be made that a location in the open countryside is required. In such circumstances the National Park Authority will require the applicant to provide a Transport Assessment or Statement (Policy AC-D1) to demonstrate that transport impacts will be minimised to an acceptable level.

³⁶⁰ National Planning Policy Framework – DCLG (2012)

³⁶¹ The Town and Country Planning (Use Classes) Order 1987 (as amended)

³⁶² Care in local communities – Department of Health 2013

- 7.235. Adequate parking should be provided in accordance with policy AC-D2 Parking Provision and Standards. Gardens or grounds within the curtilage of the building should be of an adequate size to support the intended use of the property.
- 7.236. The use of a building as a residential institution should not compromise local amenity, including by way of overlooking, loss of privacy, noise and disturbance, and the intensification of use should not adversely affect the character of the area.
- 7.237. Any proposals that relate to secure residential institutions (use class C2a) will also be considered under this policy.

HC-S8 RESIDENTIAL INSTITUTIONS

- 1. Proposals for new residential institutions will be supported where they meet all of the following principles and accord with other policies in this plan:**
 - a) They re-use existing buildings, including hotel and guesthouse premises (RT-D3 clause 1), without the need for significant extension and accord with policies relating to the conversion or structural alteration of buildings (CE-S5 and CE-S6).**
 - b) The design and layout of access and parking requirements are compatible with landscape character and built heritage (AC-S3).**
 - c) Traffic generation can be accommodated by the local road network without adversely affecting road safety and capacity.**
 - d) The use does not compromise local amenity or result in an unacceptable impact on the character of the area (CE-S1, CE-S4).**
 - e) The proposal incorporates appropriate adaptations to climate change and flood risk, particularly relating to the vulnerability of the proposed use (CCS1 and CC-D1)**
- 2. Regard should be had to location and the level of services and facilities that may be required to support the proposed use. If the National Park Authority considers that the proposal would have significant transport implications a Transport Assessment or Statement will be required (AC-D1).**
- 3. Proposals which encourage the understanding and enjoyment of the National Park and its special qualities (RT-S1) will be favourably considered where they also accord with policies in this Plan.**
- 4. Extensions to existing residential institutions will be permitted where it can be demonstrated that they will not harm the character of the building and in accordance with the design principles set out in policy CE-S7.**

8. ACHIEVING A SUSTAINABLE ECONOMY

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

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

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

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

PURPOSE OF POLICIES

8.1. The policies in this section seek to encourage development which will help strengthen and diversify the Exmoor economy and sustain the high quality environment of the National Park. Although responsibility for economic development in the area lies with Somerset and Devon County Councils and West Somerset and North Devon District Councils, the National Park Authority, in addition to its duty under the Environment Act, plays an important role in drawing up an agreed vision for the area, including through the Exmoor National Park Partnership Plan and working with partners, not least its constituent local authorities, to facilitate actions to benefit the National Park and its communities.

NATIONAL POLICY CONTEXT

8.2. The Environment Act 1995 gives National Park Authorities a duty to foster the economic and social well-being of local communities in carrying out National Park purposes. The National Parks Circular recognises that conserving and enhancing the natural beauty, wildlife and cultural heritage and supporting vibrant, healthy and productive living and working communities need not be in conflict. The benefits of the environmental economy can be delivered through the statutory purposes whilst at the same time enhancing those purposes. It promotes an appropriate scale of development and investment including for their setting which are most likely to maximise the benefits of a high quality environment, and to broaden the economic base and bring higher value local employment opportunities. It recognises the importance of agriculture and land based activities in creating the intrinsic character of National Parks.

8.3. National guidance states that the planning system, in pursuing sustainable development, should ensure that sufficient suitable land is available in order to deliver the development needs of an area and to make it easier for jobs to be created in settlements whilst recognising the intrinsic character and beauty of the countryside, and supporting thriving rural communities within it. Patterns of growth should ensure that the fullest possible use is made of public transport, walking and cycling. Significant development should be focused in sustainable locations³⁶³. Local Plans should set criteria or identify strategic sites; support existing, and, where possible, plan for new or emerging sectors. Policies should be flexible enough to accommodate needs not anticipated in the plan, to allow for changes in economic circumstances and facilitate flexible working practices such as the integration of residential and commercial uses³⁶⁴. National Planning Policy also seeks to encourage multiple benefits from the use of land, recognising that some open land can perform many functions such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production³⁶⁵.

8.4. The sustainable growth and expansion of businesses is supported both through the conversion of existing and new buildings. Sustainable rural tourism and leisure development is encouraged, including in appropriate locations, where identified needs are not met by existing

³⁶³ Paras 7,8,9, 17 National Planning Policy Framework – DCLG (2012)

³⁶⁴ Para 20 NPPF

³⁶⁵ Para 17 NPPF

facilities in local service centres, and where they respect the character of the countryside. The development and diversification of agricultural and other land based rural businesses is also promoted³⁶⁶.

CONTEXT

- 8.5. A thriving and sustainable Exmoor economy based on the area's environmental capital underpins the conservation and enjoyment of the National Park and its prosperity. Exmoor National Park is a major visitor destination and an important area for recreation. The high quality landscape, peace and quiet, biodiversity and cultural heritage that Exmoor provides are the major attractors for visitors, along with the opportunity to enjoy outdoor activities. The National Park's status as an International Dark Sky Reserve provides opportunities for Exmoor to be a destination which people visit to enjoy the night sky. Surveys³⁶⁷ support the view that the area remains an important environmental asset for a wide range of people with a high level of repeat visits. Tourism is the largest employer in the National Park and visitor spend helps to support a range of local shops³⁶⁸. The links between the quality of the environment and Exmoor's economy are essential.
- 8.6. Traditional farming and woodland management helped shape the landscape of Exmoor, and agriculture and forestry continue to play an important role in the area's economy and support a range of other businesses and employment in the area. Public services make up a significant proportion of the economy through public administration, health and social care and education services³⁶⁹. Business which falls within the planning 'B' use class of offices and light industry is small compared to other areas and generally of micro scale, employing 5 people or fewer. The local economy is therefore dominated by non-B* class uses and a diverse range of small scale activities. Other services and some manufacturing provide the remaining local employment.
- 8.7. Two-thirds of working age people within the National Park are economically active³⁷⁰ - lower than the North Devon, regional and national averages but slightly higher than the figure for West Somerset³⁷¹; whereas 68% of economically inactive persons are retired³⁷² higher than the figures for the region and England³⁷³. There are generally low levels of unemployment³⁷⁴ despite the low levels of economic activity as a result of the large retired population and the fact that much work is seasonal. There is a high proportion of self employment.³⁷⁵ In 2009-10, the average household income for the National Park was £28,668 compared to £33,651 for the South West.³⁷⁶
- 8.8. The rate of new 'B' Class employment development has been relatively limited and evidence suggests that this trend is likely to continue. The sectors offering the greatest opportunities for employment³⁷⁷ are likely to be in hotel and catering (tourism), reflecting the increasing importance and role of tourism within the Exmoor economy, and in health and social care, resulting from the continued growth in the proportion of the elderly population³⁷⁸. Evidence indicates that there are increasing opportunities arising from adaptation to climate change. For example supply of wood fuel but also development, supply and fitting of associated technology.

³⁶⁶ Para 28 NPPF

³⁶⁷ Cite reference

³⁶⁸ 2011 ONS Census Data 15.6% of people in employment are in accommodation and food services occupations, plus 14.2% in retail trade.

³⁶⁹ Exmoor National Park: Economic profile Table 1.1 Employment by Industry Source Labour Force Survey 2005, 2008 ONS from Defra Rural Statistics Unit, July 2010 and ENP ELR para 2.43 "public administration health and social care and education sectors account for 20% of local employment" (Nov 2009). 2011 ONS Census data 17.3% within public administration health and social care and education sectors.

³⁷⁰ 66.6% of people of working age in 2011 (aged 16-74)

³⁷¹ 2011 ONS Census data (People of working age who are economically active – England 69.9%, South West 70.2%, North Devon 69.8%, West Somerset 64.8%)

³⁷² 2011 Census data (Almost 60% - Nathaniel Lichfield ENP Employment Land Review 2009 from 2001 census)

³⁷³ 2011 Census data (45.5% of inactive persons are retired in England and 53% in the South West)

³⁷⁴ April 2010, 1.5% of the total working age population compared to 3.5% for the rest of the south west (and 1.9% in the rural areas of the south west region) Source: ONS/Defra's Rural Statistics Unit. 2011 ONS Census data 2.2% unemployed

³⁷⁵ In 2011 26.2% of economically active people on Exmoor were self employed (2011 ONS census data) compared with 9.8% nationally.

³⁷⁶ CACI Paycheck data, mid-year estimates 2009-10. Figures relate to average (mean) annual gross household income

³⁷⁷ 95%³⁷⁷ of all job growth is likely to be in hotel and catering and health and social care. Nathaniel Lichfield: ENP Employment Land Review, 2009.

³⁷⁸ Cite figures for social care

- 8.9. Employment units within the National Park include small purpose built units at Barnsclose in Dulverton, at Cutcombe Market in Wheddon Cross, workshops at Lynmouth and several in what were existing industrial buildings in Porlock. The rural nature of the National Park and small size of Exmoor's settlements means that, necessarily, some services are located in larger centres outside the National Park such as in Barnstaple, South Molton, Tiverton, and Minehead. This includes some businesses whose impacts may be incompatible with National Park purposes due to their type and level of activity. As well as sites in nearby market towns, there are a number of existing purpose built employment sites and buildings close to, but outside, the National Park boundary including at Bratton Fleming, Combe Martin, between Brushford and Dulverton and Exebridge. The National Park Authority works with neighbouring authorities so that there is a consistent approach to planning for local employment across administrative boundaries to ensure there are appropriate opportunities within and close to the National Park to help meet the needs of local communities who live or work both within and outside the National Park.
- 8.10. The Exmoor National Park Partnership Plan supports strong elements of the existing economy, such as tourism and farming, whilst encouraging new business opportunities where they can benefit and contribute to the special environment of the National Park³⁷⁹. Encouraging employment opportunities for young people remains a high priority³⁸⁰.
- 8.11. The policies within this Plan set out a framework to guide the use and development of land to encourage a diverse and strong Exmoor economy and create employment. They seek to sustain and encourage sustainable development that is consistent with National Park purposes and which, wherever possible, benefits from and contributes to the care and appreciation of Exmoor's nationally important and distinctive environment.
- 8.12. This section of the Plan covers some of the key issues for the area and includes both strategic and development management policies to guide business and agricultural and forestry development. Flexible, criteria based policies will be responsive to changing circumstances. Policies encourage a range of business opportunities through the reuse of previously developed (or brownfield) land and by providing scope for new sites and buildings within the settlements identified in Policy GP4 as Local Service Centres and Villages. Consolidating employment and services in these settlements will help to meet the needs of the National Park's communities by diversifying the economy, creating jobs and helping retain and enhance key services and facilities.
- 8.13. There are also opportunities for economic development outside settlements on farmsteads and in hamlets, particularly through the extension of existing employment sites or buildings and the re-use of traditional buildings. In recognition of the importance of farming and forestry to the area, policy provides for agricultural and forestry development as well as opportunities for the diversification of farms and other land based businesses. Supplementing farm incomes helps to contribute to management of the landscape. Ancillary retail and leisure development is encouraged where it is principally for the sale of goods produced at the premises. This is addressed in Policy HC-D16 in Section 7 of this Plan.
- 8.14. Home working and self employment make an important contribution to Exmoor's economy and policies seek to encourage home based business where it can be accommodated as part of a residential use and it is compatible with the area and the amenity of neighbouring occupiers. Communications infrastructure, including broadband, which is so important to business, is covered by Section 10 'Achieving Access for All'.
- 8.15. Policy also safeguards Exmoor's existing employment sites and buildings as an important resource giving scope for appropriate redevelopment in certain circumstances where a site cannot be made viable in the longer term (SE-D2).
- 8.16. The importance of visitors to the local economy is recognised and policies enabling the development of visitor accommodation, camping site and visitor facilities are included in Section 9 of the Plan 'Achieving Enjoyment for All'. Policies for housing, including for key workers, and for shops and other local commercial and community services and facilities which also contribute to local employment are to be found in Section 7 'Achieving a Thriving Community'.

³⁷⁹ Para 4.9 ENP Partnership Plan

³⁸⁰ Para 4.8, Partnership Plan

A SUSTAINABLE EXMOOR ECONOMY

- 8.17. Policy SE-S1 ‘A Sustainable Exmoor Economy’ applies to all proposals for business development in the National Park, Policy SE-S2 is for business development in Local Service Centres and Villages while SE-S3 applies to business development in the open countryside. Agriculture and forestry development is covered by SE-S4.
- 8.18. Policy SE-S1, ‘A Sustainable Exmoor Economy’, encourages appropriate business and employment development and seeks to avoid negative impacts on the area so the economic benefits of Exmoor’s high quality environment can continue consistent with statutory National Park purposes. This approach to encouraging the sustainable economic growth of the area is consistent with the area’s designation as a National Park, the National Park Authority duty in the Environment Act and GP1 National Park purposes and Sustainable Development. The Plan therefore seeks to encourage a range of appropriate new business and employment development to address the needs of the National Park’s local communities.
- 8.19. The rural nature of the National Park and small size of its settlements mean that Exmoor’s communities necessarily rely, for some services, facilities and employment, on larger centres outside the National Park. This includes some businesses, whose impacts may be incompatible with National Park purposes.
- 8.20. An important feature of recent economic development has been that the vitality of the local economy has been sustained without the need for high levels of new development as much that has occurred has been through changes of use or conversions of existing buildings. The National Park Authority encourages this approach in principle, as the re-use of existing buildings minimises greenfield development and is therefore a more sustainable approach in a National Park, given the limited supply of suitable greenfield land. The change of use to employment can, if carried out sympathetically, also help secure the retention of a building’s character which can be difficult to achieve in conversions to residential use, whilst also supporting the local economy. The reuse or alteration of traditional buildings should therefore be carried out in accordance with Policy CE-S4 Cultural Heritage and the Historic Environment.
- 8.21. The policies within this section provide a basis for the flexible release of appropriate sites and buildings for business development in response to emerging needs rather than to allocate land for employment use. This is because it is not considered that there is any need to allocate land or buildings for employment use given the character of the local area, the nature of the economy, the scale of past trends and forecasts of future employment growth. It is also not possible to ascertain which sites or buildings are most likely to be developed or reused and so the allocation of sites that are likely to come forward for employment purposes cannot be achieved with any acceptable degree of accuracy.
- 8.22. To conserve and enhance the character of the National Park, and in accordance with the spatial strategy set out in GP4, new employment sites and buildings will be focused in existing settlements and be of a type, scale and design appropriate to the local and National Park context (SE-S2). In the open countryside, Policy SE-S3 provides opportunities for employment development through the extension of existing employment sites or buildings and the reuse of existing buildings in farmsteads or hamlets, particularly traditional buildings of historic or vernacular merit. All proposals should respond to opportunities for enhancement and details should be included as part of a planning application. The National Park Authority encourages early discussions and will provide guidance on proposals including enhancement measures.
- 8.23. Climate change is expected to impact on all aspects of the National Park including the economy, the special qualities that attract visitors which will in turn have an impact on tourism – which itself underpins the local economy. On Exmoor, one of the main sources of emissions and greenhouse gases derives from land management (including agricultural activity, land use change and forestry). Consistent with Partnership Plan and Local Plan Objective 19 and the Partnership Plan commitment to make progress in becoming a carbon neutral National Park³⁸¹, all proposals should take into account the need to mitigate the effects of, and adapt to climate change in accordance with Policy CC-S1: Climate Change Mitigation and Adaptation. In terms of flood risk, proposals should accord with Policy CC-D1.

³⁸¹ Paras 4.2 and 4.3 Exmoor National Park Partnership Plan 2012-2017 Priority C4

- 8.24. Some businesses may grow and intensify their activity as a result of the scale of operation required, to a degree where they have a detrimental and significant impact on the appearance and character of landscape and other special qualities of the National Park and may no longer therefore be compatible with their location. Although the National Park Authority seeks to enable successful businesses to expand appropriately, there may be occasions where the scale of the business and the intensity of its activities are such, in terms of numbers of employees and traffic, for example that it should consider moving to a more appropriate location in a town or village. Within the National Park, such proposals will be dealt with under SE-S1 below, SE-S2 (business development in settlements) and SE-S3 Business Development in the Open Countryside.
- 8.25. It is important that employment needs in the National Park are met in a way that is consistent with National Park objectives, and the creation of new large scale employment opportunities such as major industry would be inappropriate and in direct conflict with statutory National Park purposes. The impacts resulting from, for example, the large buildings required, traffic generation, parking and loading operations associated with such uses are likely to make a significant impact on the landscape and other purposes of the National Park as well as on the amenity of local communities, and are therefore considered to be inappropriate. Some kinds of business development will therefore be more appropriate in larger towns outside the National Park.
- 8.26. The National Park Authority recognises the increasing expansion and improvements in telecommunications and IT technology, and the increased potential for working from home that this has enabled. Local consultations have highlighted strong support for homeworking. The National Park Authority wishes to enable this trend to continue through encouraging appropriate improvements in communications technology, policies for which are set out in Section 10 of this Plan 'Achieving Access for All'. Policy SE-S1 makes provision for home based employment where it is at an appropriate scale. Consistent with national guidance, this enables residential and employment uses to be integrated in a way appropriate to Exmoor's needs and to build on the high proportion of home workers and self employment. Where planning permission is required, in addition to Policy SE-S1, proposals for home based employment should also accord with SE-D1 Home Based Businesses. Checks should be made to ensure that there will be no impacts on wildlife such as bats or nesting birds and should be in accordance with Policy CE-S2: Biodiversity, and should conserve or enhance the historic character of existing buildings in accordance with Policy CE-S4: Cultural Heritage and the Historic Environment. Proposals for 'live- work units will be judged using policies in Section 7 of this Plan.
- 8.27. Policy SE-S1 also seeks to ensure the continued protection of existing employment land and buildings as an important resource. This should ensure that a supply of land is available for prospective businesses and minimises the need for, and avoids the cost and complication of, developing new sites of which there is a limited supply. It provides scope for appropriate changes of use in certain circumstances including where employment sites or buildings cannot be made viable in the longer term. Proposals for the change of use of employment land and buildings must, in addition to the requirements of SE-S1, accord with SE-D2 'Safeguarding Existing Employment Land and Buildings'.

SE-S1 A SUSTAINABLE EXMOOR ECONOMY

1. **Proposals for business and employment development will be encouraged to strengthen, enhance and diversify the Exmoor economy where they are consistent with the following principles:**
 - a) **They are in or adjacent to the named settlements in accordance with SE-S2. In the open countryside, they are through the extension of existing business sites or buildings or the reuse of existing buildings in accordance with SE-S3. In all cases, full consideration should first be given to the re-use of existing traditional buildings in accordance with Policy CE-S5.**
 - b) **Proposals for extensions and/or the growth and intensification of existing businesses will be carefully considered and will be permitted where it can be demonstrated that they will not have an unacceptable adverse impact including in terms of their operations, activity, scale and on amenity, the appearance and character of landscape, sensitive habitats and wildlife species.**
 - c) **Proposals for intrusive or environmentally damaging business or warehouse development or which would otherwise conflict with National Park purposes will not be permitted.**
 - d) **They are home based employment, and they accord with SE-D1: Home Based Businesses.**
 - e) **The National Park Authority will safeguard existing employment land and buildings. Proposals which would result in the loss of employment land and buildings must accord with SE-D2 and in such cases, opportunities to provide affordable housing or community uses will be sought.**

BUSINESS DEVELOPMENT IN LOCAL SERVICE CENTRES AND VILLAGES

- 8.28. Policy SE-S2 seeks to encourage a range of new 'B' and other sui generis uses, considered by the National Park Authority to be business development, in Local Service Centres and Villages. Consolidating employment and services by focusing new employment sites and buildings in settlements, in accordance with the settlement hierarchy set out in GP4, will help to meet the needs of the National Park's communities by diversifying the economy, creating jobs and helping retain and enhance key services and facilities. Town and village locations are more likely to be accessible to workers and allow easy access to services and facilities.
- 8.29. The policy encourages the reuse of buildings seeking first the reuse of traditional buildings but, where suitable buildings do not exist, other non traditional buildings or their replacement where opportunities are taken to achieve enhancement. Proposals should accord with Policy CE-S4: Cultural Heritage and the Historic Environment, Policy CE-S5: Principles for the Conversion or Structural Alteration of Traditional Buildings and Policy CE-S6 Principles for the Conversion or Structural Alteration of Non-Traditional Buildings.
- 8.30. There is scope for new sites and buildings for business in settlements. A special quality of the National Park is the lack of intrusive features in the landscape and suitable greenfield sites are few and may, over the longer term be required for a range of uses including affordable housing. It is therefore important to ensure that the best use is made of previously developed (brownfield) sites/ buildings and sites/buildings with planning permission, and these should be considered before greenfield land.
- 8.31. Where new B1 uses with a floorspace of 150 square metres or less are granted planning consent, permitted development rights may be withdrawn in respect of temporary changes of use to A1, A2, A3, A4, A5, B1, D1 and D2 of the use Classes Order³⁸². This is because this measure was introduced nationally to contribute to the viability and vitality of town centres. It could however result in the loss of B1 employment buildings in the National Park which are in short supply and which the Development Plan seeks to safeguard. The national change does

³⁸² Statutory Instrument 2013 No. 1101 The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2013. Part 4 of Schedule 2 to the General Permitted Development Order grants planning permission in respect of certain temporary buildings and uses.

not therefore fully reflect the role of employment buildings within the sparse rural area of Exmoor National Park, where their retention is essential to local socio-economic well-being.

SE-S2 BUSINESS DEVELOPMENT IN LOCAL SERVICE CENTRES AND VILLAGES

1. In the Local Service Centres and Villages named in Policy GP4, proposals for business development will be permitted where they are within, or if no suitable buildings/sites exist, well related to existing buildings and they conserve or enhance the character of the settlement pattern, are appropriate to the scale and form of the settlement, accord with Policy SE-S1 (A Sustainable Exmoor Economy) and the following criteria:
 - a) wherever possible, proposals should reuse existing traditional buildings in a way that maintains and enhances their character and in accordance with CE-S5;
 - b) where no suitable buildings exist, the replacement of an existing non traditional building will be considered where the existing building harms the character or appearance of the area; and/or
 - c) the reuse of previously developed sites will be encouraged where proposals take up opportunities to achieve enhancement;
 - d) where it can be demonstrated that Clauses (a), (b) or (c) cannot be achieved then an extension to an existing site in business use, or a new site or building may be permitted where it accords with other Plan policies including CE-S7 (Design and Sustainable Construction Principles).
2. Proposals for extensions to sites or buildings in existing business use will be permitted where they will not result in any unacceptable adverse impacts and they accord with this and other Plan policies.

BUSINESS DEVELOPMENT IN THE OPEN COUNTRYSIDE AND FARM DIVERSIFICATION

- 8.32. Policy SE-S3 provides opportunities, and sets out the policy framework, for new business development in the open countryside, through the extension of existing business sites or buildings—and the reuse of existing buildings in farmsteads or hamlets. Ensuring that the best use is made of existing buildings, including those with the benefit of planning permission, will help to ensure that the National Park is conserved and enhanced. A further element of the policy (Clause 4) is particularly aimed at farms and land based businesses, including estates, and sets out the provision specific to proposals for farm diversification in recognition of the benefits that it can bring to sustaining a farm or other land based business responsible for land management.
- 8.33. The Policy takes forward an element of the Exmoor National Park Partnership Plan which identifies significant potential to increase the value added locally to sustainable materials produced in the National Park. The Partnership Plan seeks greater usage of local sustainable materials, helping to create employment and new business opportunities where they do not adversely affect the National Park. This also has the potential to help sustain traditional building skills in the area which in turn contributes to the conservation and enhancement of the National Park³⁸³.
- 8.34. To date, diversification within the National Park has particularly centred on tourism and game shooting activity. However other avenues have included the processing of farm produce. Such businesses may not necessarily be related in type to the produce of the farm, activities could include the development of new agricultural opportunities or adding value to primary produce as highlighted by the Partnership Plan. Consultation³⁸⁴ has shown that the main reason for diversification is to generate additional income. The level of income resulting from these additional business activities appears to vary considerably: in some cases, the non-farming activities are very much ancillary to the main farm business, whilst for others they have represented the main source of income.

³⁸³ Cite para number

³⁸⁴ Nathaniel Lichfield: Employment Land Review

- 8.35. The main aim of a farm diversification proposal should be to supplement the core farm business and not to replace it and the National Park Authority will therefore resist proposals which may result in the piecemeal loss of assets from farms and thereby affect the overall viability of farm or land holdings. In order to ensure the long-term link between the primary farming or other land based business which formed the basis for the diversification, the National Park Authority will use planning obligations to ensure that the development cannot be disposed of separately from the main building group so that ownership and control of the development is retained and income will be returned to appropriate management of the landscape and traditional buildings of historic and vernacular merit. Such agreements may also be used to tie existing buildings, which have previously been granted a change of use under farm diversification, with the main building group.
- 8.36. In the open countryside, reuse of traditional buildings is strongly favoured. Policy CE-S5 therefore encourages the re-use of traditional agricultural buildings where the existing building is well related to existing (farm) buildings in a farmstead. The re-use of existing or construction of new isolated buildings for farm diversification will not be permitted. The re-use of such buildings as camping barns may be permitted where a proposal accords with Policy RT-D6. Proposals for home based businesses should accord with Policy SE-D1.
- 8.37. For land based businesses, Clause 4 of the Policy also gives scope for the re-use of a non-traditional (or modern) building. This will be acceptable only if it can be clearly demonstrated that the agricultural use has ceased. The re-use/change of use of purpose-built or pre-fabricated agricultural buildings to business use, e.g. prefabricated barns, or agricultural buildings that are subject to a planning condition requiring their removal on the cessation of the agricultural use, will not be considered for conversion and it is important therefore that the building is suitable for the proposed use as a change of use will only be acceptable where the building does not require significant reconstruction or alteration in accordance with Policy CE-S6.
- 8.38. Where permission is granted for proposals for the use of non traditional agricultural buildings for non-agricultural purposes, the National Park Authority will attach a condition removing permitted development rights granted by the Town and Country Planning (General Permitted Development) Order 1995 in respect of the construction of new farm buildings. Where new B1 uses with a floorspace of 150 square metres or less are granted planning consent, permitted development rights may be withdrawn in respect of temporary changes of use to A1, A2, A3, A4, A5, B1, D1 and D2 of the use Classes Order³⁸⁵. This is because this measure was introduced nationally to contribute to the viability and vitality of town centres. It could however result in the loss of B1 employment buildings in the National Park which are in short supply and which the Development Plan seeks to safeguard. The national change does not therefore fully reflect the role of employment buildings within the sparse rural area of Exmoor National Park, where their retention is essential to local socio-economic well-being.
- 8.39. The location of new business activity in the open countryside could lead to increased travel movements and consequently emissions. Proposals should therefore accord with Policy AC-S1 to ensure that levels of traffic and emissions are acceptable.

³⁸⁵ Statutory Instrument 2013 No. 1101 The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2013. Part 4 of Schedule 2 to the General Permitted Development Order grants planning permission in respect of certain temporary buildings and uses.

POLICY SE-S3 BUSINESS DEVELOPMENT IN THE OPEN COUNTRYSIDE

1. Proposals for business development outside the Local Service Centres and Villages named in Policy GP4 will only be permitted where the scale and appearance of the development are acceptable, they relate to the reuse of existing buildings and accord with SE-S1 and the following criteria:
 - a) the proposal is well related to an existing group of buildings where there is an existing dwelling for:
 - i) the small scale extension of an existing site or building in business use where they are consistent with Policy CE-S7. Proposals for extensions and the intensification of current diversified businesses will be in accordance with SE-S1; or
 - ii) the change of use/conversion of an existing traditional building in accordance with CE-S5.
2. Proposals will be permitted only where it can be demonstrated that:
 - a) they will only generate a level of activity that would have an acceptable impact on the landscape, wildlife or historic environment of the National Park, will not conflict with neighbouring land uses or cause pollution or other unacceptable environmental impacts; and
 - b) satisfactory access and traffic requirements can be achieved consistent with National Park purposes;
3. The erection of new business premises or 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.
4. Additionally, proposals for the diversification of existing agricultural, or other primary businesses responsible for land management, through the re-use/change of use of an existing non-traditional building for business development may be permitted where the following will be achieved:
 - a) they comply with the requirements of Clauses 1, and 2. of this Policy, Policy CE-S6 and significant reconstruction or alteration are not required;
 - b) it can be demonstrated that the agricultural use of the existing building(s) to be reused is redundant;
 - c) the proposed business development supports an existing agricultural or other primary business responsible for land management and the diversification proposal does not conflict with the existing farming or land management activity;
 - d) planning obligations will be used to ensure that ownership and control of the development is retained by the primary land based business by not disposing of the development separately from the main building group to ensure that income will be returned to appropriate management of the landscape; and
 - e) proposals to change the use of an existing building from agricultural to a business use (use classes B1, B2, B8 or sui generis), a condition may be attached to the permission to enable the building to be used for the purposes of agriculture or the permitted business use.

HOME BASED BUSINESSES

- 8.40. The National Park Authority wishes to encourage home working including through allowing home based business of an appropriate scale and activity. Not all home-based businesses require planning permission if they are ancillary to domestic use. However, for those that require planning permission, the effect on the properties in question as well as the amenity of neighbours and other potential impacts needs to be taken into account.
- 8.41. This policy provides for the use of a residential property, a small extension to homes, the conversion of existing outbuildings within the domestic curtilage or, where there are no existing buildings, new small scale buildings for home based businesses within the domestic curtilage where their scale and activity is such that they will not adversely affect the National Park or the amenity of the occupiers of neighbouring properties. Occasionally, the use of existing buildings close to the dwelling house but not strictly within the curtilage may be acceptable

where their siting is closer to the main dwelling house than any existing buildings within it and their reuse would result in a more acceptable scheme in terms of the impact on the area. Proposals for residential extensions to accommodate a home based business will need to accord with Policy HC-D13 on residential extensions. An important consideration will be to ensure that the home based business does not change the residential character of the property.

- 8.42. Impacts on the amenity of the area or on occupiers of neighbouring properties include consideration of the scale, size and type of the business: potential additional traffic generation, access, noise or disturbance caused by visitors or business operations. Any proposals for home working should include energy efficiency measures to reduce emissions and should therefore be in accordance with Policy CE-S7: Design and Sustainable Construction Principles.
- 8.43. Where it considers it necessary, the National Park Authority will seek to attach conditions to any granting of planning permission. This will include to control the impact on local amenity, the scale of the business use and its hours of working, for example. Where necessary, the site may be tied to the main dwelling or the occupier and if, the use were to cease, for example on selling, would revert back to purposes incidental to the main building. Permitted development rights may be withdrawn to control storage of materials and equipment and the erection of further buildings and/or structures. In certain cases, permission may be granted for a temporary period to allow the impact of the business to be assessed.

SE-D1 HOME BASED BUSINESSES

1. **The use of part of a residential property, a small scale extension, the use of ancillary buildings where they are well related to existing buildings or, where no suitable buildings exist new outbuildings within the domestic curtilage, for a small scale home based business will be permitted where:**
 - a) **there is no unacceptable adverse impact on the landscape or the amenity of the area or on the occupiers of neighbouring properties; and**
 - b) **where an extension is proposed the development accords with Policy HC-D13: residential extensions.**
2. **Where necessary, conditions will be attached to any granting of planning permission including to:**
 - a) **control the use to avoid or minimise any potential adverse impacts;**
 - b) **remove permitted development rights to protect the character and appearance of the building;**
 - c) **ensure any new development may only be occupied in association with the dwelling and cannot be let or disposed of separately from that dwelling; and**
 - d) **allow, where appropriate, the business use to cease and revert to an ancillary domestic use without the need for further planning permission.**

SAFEGUARDING EXISTING EMPLOYMENT LAND AND BUILDINGS

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

- a) advertisement on site, in local newspapers, estate/property agents and, where appropriate, the District Council's sites and premises registers or otherwise as requested by the National Park Authority;
 - b) the owner/applicant to advertise the premises for a minimum period of twelve months (as above) and to re-advertise at three month intervals if they fail to provide a willing buyer/occupier in the first three months of marketing;
 - c) the owner or applicant to supply the National Park Authority with the advertisement details including sales particulars with a guide price to reflect the market value of the site/building(s); and
 - d) the owner/applicant to have provided the National Park Authority with written evidence of all enquiries received and the reasons why potential buyers/occupiers found the site/buildings to be unsuitable.
- 8.46. If the Authority is satisfied that the site and/or buildings are no longer viable in employment use, the owner/applicant will be required to maintain an enhanced level of employment generating uses on the remaining part of the site/in the building (i.e. at the same level as on the whole site but on/in a smaller area) or alternative provision will need to be provided on another suitable site(s) / building(s) under the control of the Applicant. If it can be demonstrated that these are not possible, within or adjoining the named settlements in GP4, redevelopment of the site for community uses, or if this is not appropriate, the provision of affordable housing to meet a local need in a named settlement will be favoured.

SE-D2 SAFEGUARDING EXISTING EMPLOYMENT LAND AND BUILDINGS

1. **Development proposals that would involve the loss of employment land and/or buildings will not be permitted unless it can be demonstrated that the site and/or buildings cannot be continued or made viable in the longer term. Applicants will be required to provide detailed evidence to justify their proposals and demonstrate that:**
 - a) **all available opportunities of grant funding and financial support to help retain the employment use(s) have been fully explored and none are viable; and**
 - b) **reasonable marketing of the site and/or building(s) for employment uses for a minimum period of 12 consecutive months has occurred.**
2. **If the Authority is satisfied that the site and/or buildings are no longer viable in employment use, the following will be required:**
 - a) **in the first instance, employment-generating uses will be maintained on the remaining part of the site/in the building, or**
 - b) **alternative provision will be provided on another suitable site(s)/building(s) under the control of the Applicant and in the locality or where it can be demonstrated that this is not possible, elsewhere in the National Park.**
 - c) **If it can be demonstrated that (a) or (b) are not possible, the reuse/redevelopment of the site for community uses, or if this is not appropriate, the provision of affordable housing to meet a local need in a named settlement in accordance with policies GP4 and HC-S1, will be favoured.**
3. **In respect of 2b) above, planning conditions or obligations will be used to ensure that the alternative provision is secured at an appropriate time in relation to the redevelopment of the site/building.**

AGRICULTURAL AND FORESTRY DEVELOPMENT

CONTEXT

Agriculture

- 8.47. Traditional farming and woodland management has helped create Exmoor's distinctive landscape. Sustainable agriculture and forestry are essential for maintaining the characteristic landscapes of the National Park, can play an important role in helping to manage and enhance Exmoor's wildlife and the environment and are major contributors to the local economy.
- 8.48. Farming, both on Exmoor and nationally, has faced a number of challenges which have particularly affected smaller farms in upland areas. The consequence on Exmoor has been a decline in traditional forms of farming with a decline in medium sized farms and an increase in the number of smaller (residential) holdings. As a result, a number of large farms managed by a relatively small number of operators are responsible for the management of a very large proportion of Exmoor's agricultural land. Evidence indicates there is a relatively lower dependency upon agriculture as a source of income³⁸⁶. Employment levels have fallen, a trend that is expected to continue, and the average age of farmers on Exmoor is now more than 55³⁸⁷. These changes have implications for Exmoor's local economy.

Woodland and Forestry

- 8.49. Although employment figures for the Woodland and Forestry sector are included within the broader category of agriculture, locally it is an important sector in its own right contributing to environmental management and the conservation of the landscape and habitat diversity. Exmoor has a number of forestry plantations which are among the highest yielding and extensive in the South West and softwood production will continue to be an important part of the economy on Exmoor. The woodland and forestry sector also makes a contribution to outdoor leisure and recreation activities. Timber from Exmoor's forestry is used for a range of purposes including wood fuel and manufacturing. As with farming, the opportunity exists to achieve a greater return from woodland from the development of processing activities. It will be important to ensure that the scale and type of any processing is appropriate to the local and National Park context.
- 8.50. Changes in the farming and forestry sectors are likely as demand for food, timber, and other products grows. The Government has made a commitment to identify means of increasing food production in ways that also improve the environment³⁸⁸. Other changes include—a trend for farm houses to be sold off, holdings split up, and an increase in the number of part-time and 'hobby farms'.
- 8.51. The Partnership Plan recognises that truly sustainable farming and land management can continue to provide high quality food, timber and other products while maintaining a healthy environment that also provides a wide range of other benefits – the 'ecosystem services'. These include clean water, managed flood risk, and provide opportunities for recreation, enjoyment and inspiration. Careful management will be needed as a result of increasing demands for timber, particularly as fuel for e.g. wood heating, to ensure that economic and employment opportunities are balanced with landscape, nature conservation and cultural heritage interests.
- 8.52. Many agricultural or other land management activities are not controlled by the planning system. However, planning policy has a role to play, for example, in how the farming community can contribute to other areas of the economy through diversification whilst conserving and enhancing the National Park for future generations to enjoy. Policy SE-S3 earlier in this section of this plan seeks to encourage farm diversification which is appropriate in the context of a National Park.
- 8.53. In line with Government policy, the Authority recognises the importance of enabling farm businesses to become more competitive, comply with changing legislation and associated

³⁸⁶ The State of Farming on Exmoor, University of Exeter, 2004

³⁸⁷ The State of Farming on Exmoor, University of Exeter,

2004

³⁸⁸ the Natural Environment White Paper.

guidance, diversify into new agricultural opportunities and to adapt to changing markets. The best and most versatile agricultural land (defined as land in grades 1, 2 and 3A of the Agricultural Land Classification) (Vale) will be safeguarded. Within the National Park there is a small amount of grade 3a land in Porlock Vale.

- 8.54. The use of land for the purposes of agriculture or forestry (including afforestation), and the use of existing buildings on the land for agricultural or forestry purposes do not constitute "development" and so do not require planning permission. The carrying out of building, engineering, mining or other operations and the making of any material change in the use of buildings or land do however constitute "development". Certain agricultural and forestry developments have "permitted development rights" which means that a specific planning permission is not needed if a development falls within one of the categories set out in the Town and Country Planning General Permitted Development Order (GPDO) 1995 and meets all the conditions laid down in it. Developments that are not covered by these permitted development rights require planning permission in the usual way.
- 8.55. Under the GDPO, applications for a range of buildings/structures can be made through a system of notification, whereby the Authority is required to approve the details of a scheme relating to its siting, design and external appearance. In considering such applications the Authority must be satisfied that the proposal is designed for the purposes of agriculture or forestry in terms of its scale and location and will not have an adverse impact on the character of the wider landscape. Changes in requirements relating to, for example, protection of water quality from run-off through provision of covered storage for slurry may lead to proposals for buildings or structures. The investigation of functional need including, where necessary, independent expert advice or other aspects of the agricultural holding may be undertaken, for example, where a proposed building is of a substantial size, clarification may be sought over the intended use to ensure that the size is justified.
- 8.56. Applicants will need to demonstrate that very special circumstances exist for proposals for new buildings in isolated locations in the open countryside. These circumstances may be as a result of changes in requirements to comply with changing legislation or, for example, the siting of slurry stores, which through planning regulations must be sited away from certain farm buildings. Proposals for new buildings on recently subdivided holdings will be the subject of particular scrutiny to ensure that a need for the building can be justified. Proposals may require a landscaping scheme, which reduces the impact of the proposal on the wider landscape.
- 8.57. The National Park Authority encourages applicants to approach the Authority at an early stage for advice on siting and design of buildings, whether a proposal requires planning permission and the need for, and scope of, an Environmental Impact Assessment. In assessing proposals for agricultural and forestry development and operations, the main considerations must be impact on the landscape, wildlife, visual quality and historic character of the surrounding area, as well as possible environmental impacts and effects on neighbouring land uses, including residential.
- 8.58. Potential impacts upon the natural environment will need to be addressed. Amongst other environmental considerations, proposals that could have an adverse effect on sites for nature conservation, including Sites of Special Scientific Interest or the integrity of European sites would not be in accordance with the Development Plan and proposals should accord with Policy CE-S2 Biodiversity.
- 8.59. There are many important historic farmsteads in the National Park, and any proposals for agricultural or forestry development should not impact on the character and setting of these heritage assets. Similarly, care needs to be taken to ensure that impacts on the wider historic landscape and heritage assets such as archaeology are avoided. In assessing the impact on the historic environment, proposals should accord with Policy CE-S4: Cultural Heritage and Historic Environment.
- 8.60. In assessing proposals for agricultural and forestry development every effort should be made to minimise any impacts through the use of appropriate siting, design, layout, materials and surfacing. In the case of agricultural or forestry buildings or structures, dark grey fibre cement and timber cladding will be encouraged. A landscaping scheme which reduces the visual impact of the proposal on the wider landscape to an acceptable level may be required as part of the proposal. Measures should be taken to ensure that proposals for slurry stores avoid

causing pollution by the fitting of covers. The National Park Authority will expect that tracks should be as visually unobtrusive as possible by: following natural contours; not altering the natural topography; ensuring that the width is minimised; that water runoff is managed; that arrangements are in place to prevent soil or silty water running off including into watercourses; and avoiding the need to import materials from elsewhere. Surfacing should be with stone chippings or gravel and, in the case of a twin wheeled track, have grass in the middle to minimise its impact on the landscape.

- 8.61. Climate change and the increased risk of flooding are likely to result in changes to agriculture and forestry, such as an increase in biomass crops for renewable energy for example. Proposals for agricultural and forestry development will need to accord with Policies CC-S1: Climate Change Mitigation and Adaptation and Policy CC-D1: Flood Risk.
- 8.62. Agricultural and forestry development can often involve large machinery, which may adversely impact on existing transport infrastructure particularly historic bridges or fords. Proposals will therefore also need to take account of any increase in traffic and potential impacts on transport infrastructure and accord with Policy AC-S1: Sustainable Transport.
- 8.63. The Authority will consider attaching a condition to appropriate planning permissions requiring the removal of a building if it is no longer needed for agricultural purposes. Where new agricultural buildings with a floorspace of 500m² or less are granted planning consent, permitted development rights may be withdrawn in respect of changes of use³⁸⁹ of agricultural buildings and any land within its curtilage to uses A1, A2, A3, B1, B8, C1 and D2. This is consistent with the designation of the area as a National Park where development plan policies do not provide for new buildings in the open countryside unless they are justified by reasons of agricultural or forestry need.

³⁸⁹ Statutory Instrument 2013 No. 1101 The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2013. Part 3 of Schedule 2 to the General Permitted Development Order grants planning permission in respect of certain temporary buildings and uses.

SE-S4 AGRICULTURAL AND FORESTRY DEVELOPMENT

1. Permission will be granted for new or replacement buildings, tracks and structures or extensions required for agriculture or forestry purposes (including those submitted under the notification procedure) where:
 - a) it can be demonstrated there is a functional need for the extension, building, structure or track and its size and scale is commensurate with the demonstrated need;
 - b) the building, track or structure is designed for the purposes of agriculture or forestry;
 - c) in the case of new buildings, the site is related physically and functionally to existing buildings associated with the business unless it can be demonstrated that there are exceptional circumstances relating to agricultural necessity for a more isolated location;
 - d) they do not generate a level of activity or otherwise detrimentally affect:
 - i. the amenity of surrounding properties and occupiers including, through loss of daylight, overbearing appearance, or conflict with neighbouring land uses;
 - ii. the enjoyment of the National Park by the public;
 - e) appropriate measures are taken to ensure they do not, including through the level of activity, have an adverse impact on the locality, exacerbate flood risk or surface water run-off, (Policy CC-D1) cause pollution (Policy CC-S5) or other unacceptable environmental impacts;
 - f) they are of an appropriate siting, size, scale, massing, layout, external appearance, materials, and design that have an acceptable impact on the landscape character, wildlife and cultural heritage;
 - g) a landscaping scheme which reduces the visual impact of the proposal on the wider landscape to an acceptable level and which reinforces landscape character may be required as part of the proposal. Existing elements such as trees, hedges and stone walls should be retained;
 - h) the development incorporates measures which maintain, promote or restore biodiversity in accordance with Policy CE-S2: Biodiversity;
 - i) it can be demonstrated that opportunities have been taken for:
 - i. the integration of passive design and sustainable construction methods to improve energy efficiency, and
 - ii. the integration of appropriate renewable energy technologies to reduce carbon emissions in accordance with CC-S3;
 - j) the development has been future proofed against climate change impacts, including flood risk by incorporating measures such as sustainable drainage systems; and
 - k) waste and resource use are minimised through the reuse of materials and buildings, water efficiency and management of site waste.
2. The National Park Authority will consider attaching a condition to require the removal of agricultural or forestry buildings when they are no longer required and the reinstatement of the land and/or will consider tying the agricultural building(s) to the associated land holding to ensure there is a viable land holding related to the building(s) in the future.

9. ACHIEVING ENJOYMENT FOR ALL

Objective 8. *To provide opportunities for people from all backgrounds and abilities, including young people and new audiences, to learn about and enjoy Exmoor National Park, leading to a greater understanding of Exmoor and its way of life.*

Objective 9. *To maintain and improve the recreational opportunities in the National Park particularly the rights of way network, access to open country, other quiet and active recreation based on Exmoor's special qualities; and ensure that opportunities for recreation can be enjoyed by people from all backgrounds and of all abilities*

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

RECREATION AND TOURISM

PURPOSE OF THE POLICY

9.1. Recreation, tourism and environmental education developments provide opportunities for the understanding and enjoyment of Exmoor National Park. Proposals for such developments will be supported where facilities and activities accord with the principles of sustainable tourism. The policies in this section will relate to all developments that help to increase the awareness of the understanding and public enjoyment of Exmoor National Park and its special qualities; this reflects the second statutory purpose of National Parks.

NATIONAL POLICY CONTEXT

- 9.2. In terms of sustainable recreation and tourism development the national policy guidance³⁹⁰ clearly demonstrates that such developments should be supported where they would have environmental, social and economic benefits to the area including for environmental conservation, rural businesses, visitors, and local communities. Such development includes the expansion of existing businesses in appropriate locations, where this will not compromise the National Park's special qualities, and recognising that tourism and recreation development may meet identified needs that are not provided by existing settlement facilities, and provide benefits for the education, health and well-being of local communities. The government published six key challenges³⁹¹ that should be addressed to ensure tourism is sustainable in a time of climate change (see CC-S1 Climate Change Mitigation and Adaptation).
- 9.3. The National Parks Circular³⁹² supports the aims of the NPPF and recommends that National Park Authorities continue to create a positive environment for sustaining rural businesses and developing future businesses appropriate to the high quality environment of the National Park, including those which capitalise on access, recreation and tourism. It encourages the identification and promotion of new access and recreational activities and ways of delivering them – recognising that not all forms of such activity are compatible and may need to be excluded if there are adverse impacts on the National Park's special qualities and people's enjoyment of them.
- 9.4. Where irreconcilable conflicts exist between conservation and public enjoyment then conservation interest should take priority - known as the 'Sandford Principle' (see policy GP1). However, such irreconcilable conflicts very rarely occur in the National Park.
- 9.5. The National Park Authority will continue to support and work in partnership with others to help deliver the priorities for tourism identified through the Exmoor Tourism Partnership and the National Park Circular.

³⁹⁰ National Planning Policy Framework (DCLG) 2012

³⁹¹ Sustainable Tourism in England – A framework for action: DCMS 2009. Six challenges include: (i) minimise impact and resource use, (ii) address impact of tourism transport, (iii) improve quality and make holidays accessible to all, (iv) improve the quality of tourism jobs, (v) maintain and enhance community prosperity and quality of life, (vi) reduce seasonality of demand.

³⁹² English National Parks and The Broads: UK Government Vision and Circular (DEFRA) 2010

CONTEXT

- 9.6. Tourism and associated recreation activities are recognised as the main contributors to the Exmoor economy, and the natural environment of the area is acknowledged as being central to the prosperity of the sector. The importance of tourism in Exmoor is expected to continue and increase in the long term; a trend that can be supported through tourism partnerships and appropriate policies³⁹³. It is important to support a year-round tourism economy and increase visitor spend to help sustain essential local services and facilities and the working age population. The significance of the tourism and recreation sector is recognised by local communities and offers the potential to conserve and enhance Exmoor's special qualities, influence rural regeneration, and to retain and re-circulate money locally.
- 9.7. The high quality landscape, wildlife, cultural heritage, and overall tranquillity that Exmoor provides are a major attraction for visitors and underpin the local tourism industry. In 2007 Exmoor National Park became the second English National Park to have been awarded the European Charter for Sustainable Tourism in Protected Areas³⁹⁴. This award recognises National Parks which are managing relevant development and activities based on sustainable tourism principles³⁹⁵.
- 9.8. Sustainable tourism is defined by The European Charter for Sustainable Tourism in Protected Areas as: *“any form of development, management or tourist activity which ensures the long term protection and preservation of natural, cultural and social resources and contributes in a positive and equitable manner to the economic development and well-being of individuals living, working or staying in protected areas.”* Sustainable tourism contributes towards the delivery of National Park statutory purposes and, if managed correctly, will bring positive experiences to visitors and benefits that will help to maintain Exmoor's natural environment, cultural heritage and communities.

RECREATION & TOURISM CONSIDERATIONS

- 9.9. Policy RT-S1 supports the provision of tourism, recreation and outdoor education developments on Exmoor which encourage the quiet enjoyment and appreciation of the National Park special qualities whilst providing environmental, economic and social benefits. Tourism can bring a number of benefits for local communities including an improved range of services and facilities, and more jobs; whilst greater use of local products and services by tourism businesses can benefit the local economy and the distinctiveness of Exmoor. Impacts on landscape character and tranquillity, through intensity of activity and overall scale will be key considerations in determining whether proposals for recreation and tourism developments are acceptable³⁹⁶.
- 9.10. Tranquillity is one of Exmoor's special qualities; providing an experience of calm in an area protected for its high quality landscapes. It is important for people's health, well-being and improving quality of life; and also significant for Exmoor's economy, as people come here to escape the noise disturbance and visual intrusion experienced in more urban areas³⁹⁷. Some recreational pursuits such as motorised sporting activities and clay-pigeon shooting grounds are therefore considered unacceptable in the National Park as they have the potential to disturb the quiet enjoyment of others through generating a level of manmade noise disturbance that may be sustained for significant periods of the day, throughout the year (CC-S5 Pollution).
- 9.11. Policy RT-S1 and the associated development management policies (RT-D1 – RT-D9) provide scope to increase the diversity of visitor accommodation for potential visitors to Exmoor. This approach aims to build upon the tourism role of the towns and villages in the National Park and to provide farm diversification opportunities (SE-S3 Business Development in the Open Countryside).

³⁹³ Exmoor National Park Employment Land Review

³⁹⁴ Awarded by the Europarc Federation

³⁹⁵ <http://www.european-charter.org/become-a-charter-area/charter-principles>

European Charter for Sustainable Tourism in Protected Areas – underlying principles

³⁹⁶ Beyond the picturesque – Principles for sustainable tourism in National Parks and AONBs: The Countryside Agency 2004

- 9.12. Tourism surveys³⁹⁸ are undertaken annually for the National Park and Greater Exmoor area. Survey data indicates that the length of stay increased in the non-serviced sector as the number of visitor days rose but number of visitors decreased; whereas the serviced accommodation experienced an increase in the number of short-breaks. There appears to be adequate capacity in terms of occupancy for both sectors; however occupancy levels increase during the main summer season (July-September) to between 80-90% for non-serviced accommodation. Visitor numbers can lead to additional pressures on natural resources such as water, although there are currently no issues of over-abstraction proposals should be mindful of water conservation and the requirements of policy CC-D3 Water Conservation.
- 9.13. The natural environment of Exmoor lends itself to certain outdoor recreation activities that rely on natural features and is ideally suited to quiet recreation pursuits including walking, cycling, and horse-riding that utilise the road network, rights of way and open access land. The actual and potential recreational value of Exmoor is important for residents and for those who visit the National Park; and has become an important location for international and national outdoor events. Water-based recreation is also popular in some areas of the National Park including canoeing and fishing. Rivers are important landscape features in the National Park and inform landscape character, and Wimbleball Lake (a man-made reservoir) has become a significant feature of the Haddeo landscape character area.
- 9.14. Policies RT-S1 and RT-D10 – RT-S2 aim to ensure that the use or intensity of sports and recreational activities should be compatible with Exmoor's rights of way, natural beauty, wildlife and cultural heritage and will not result in cumulative developments that are likely to adversely affect these qualities, impinge on tranquillity and the enjoyment of the special qualities in an area. Opportunities to enhance the access network and green infrastructure provision (CE-S3 Green Infrastructure) through path improvements and new linkages, including across the National Park boundary, are encouraged. This will be particularly sought where development proposals can mitigate potential impacts on the access network (RT-D12 Access Land and Rights of Way).
- 9.15. Exmoor also provides opportunities for learning through a number of residential environmental education facilities used by schools across the country and managed by a number of public and private organisations. Most environmental education facilities have converted and changed the use of existing buildings and provide opportunities to reach a wide range of young people to encourage a deeper understanding and appreciation of Exmoor National Park and the benefits of outdoor recreation. Proposals which aim to provide these opportunities will be encouraged through the conversion or change of use of existing buildings in accessible locations in accordance with policy HC-S8 Residential Institutions.
- 9.16. The development of sites for recreation and tourism development on Exmoor should be small-scale in keeping with the pattern of development and conservation of the natural environment and cultural heritage of the National Park.
- 9.17. Proposals should be able to demonstrate that developments can be accessed safely and do not generate traffic levels that would have implications for the capacity of the access road and safety of road users. During the peak summer months traffic levels can rise considerably as many visitors to Exmoor choose to travel by car; this can lead to congestion in popular destinations. Where possible, proposals should be accessible by more sustainable modes of travel – this will be expected to be demonstrated through a travel plan if significant traffic movements are likely to be generated (AC-S1 Sustainable Transport and AC-D1 Transport and Accessibility Requirements for Development).
- 9.18. The overwhelming majority of recreation and tourism developments that have been granted permission have related to changes of use or conversions rather than for new buildings, and this approach will continue to be encouraged. Buildings that have been converted have varied in type but a large number of the proposals have sought to bring farm buildings and other vacant premises back into active and beneficial use - highlighting the importance of existing buildings as a resource. The reuse of existing buildings and premises represents an appropriate and sustainable basis as a means by which sustainable development can be achieved within the National Park where compatible with the heritage value of the buildings and any existing wildlife

³⁹⁸ STEAM reports are produced for the National Park Authority by GTS (UK) Ltd and provide a measurement of tourism at the local level from the supply side.

interest (CE-S5 Principles for the Re-use of Traditional Buildings and CE-S6 Principles for the Re-use of Non-Traditional Buildings).

- 9.19. On Exmoor a number of traditional farmsteads have converted buildings into holiday lets as part of a farm diversification scheme (policy CE-S5). There are very few examples where the conversion of redundant non-traditional (modern) farm buildings to tourism, recreation or education uses has occurred. This is due to the fabrication and structural limitations of such buildings which are often not suitable for such uses through conversion or change of use. However where traditional buildings are either not available or suitable, due to their historic or biodiversity interest, for the intended recreation or tourism use, the change of use of such non-traditional agricultural buildings may be permitted (Policy CE-S6 and clause 4 of policy SE-S3 Business Development in the Open Countryside).
- 9.20. New-build development for recreation, tourism or environmental/outdoor education facilities will be supported in principle, in sustainable and accessible locations consistent with Policy GP4 Spatial Strategy. Policy GP4 provides the overarching development strategy across the National Park; whilst development management policies RT-D1 – RT-D12 will have specific criteria including location, and appropriate measures relating to setting, scale and impacts. Tourism and recreation development should also have regard to policies CC-S1 Climate Change Mitigation and Adaption and CC-D1 Flood Risk in terms of their design, siting and location.

RT-S1 RECREATION AND TOURISM

- 1. Opportunities to provide a high quality visitor experience on Exmoor through a diverse range of recreation, tourism and environmental education facilities will be encouraged, where it can be demonstrated that proposals for such development conform to the following principles:**
 - a) They underpin the quiet enjoyment of the National Park. Proposals that actively enhance the understanding and enjoyment of Exmoor’s special qualities will be favourably considered.**
 - b) They do not adversely affect Exmoor’s special qualities, including its wildlife, either individually or cumulatively through harmful levels of activity or use.**
 - c) They contribute towards a sustainable future for Exmoor’s local economy and communities.**
 - d) They support the improved health and wellbeing of people living, working and visiting Exmoor through the benefits of recreation (RT-D10) and experience of tranquillity.**
 - e) They ensure appropriate and safe access by the road network and where possible by walking, cycling, horse-riding and public transport. Development that would generate significant transport movements should be accessible by sustainable travel modes set out in a travel plan (AC-S1, AC-D1).**
 - f) They safeguard the existing access network, including public rights of way, and access land; and provide enhancements where opportunities arise (RT-D12).**
 - g) They respond to opportunities to improve the quality and viability of existing recreation and tourism businesses, through appropriate restoration, extension, expansion or diversification (CE-S1, CE-S7).**
 - h) Their location is consistent with policy GP4 and they are of a scale compatible with their location and setting, in accordance with the relevant development management policy considerations for tourism and recreation (policies RT-D1 to RT-D12).**
 - i) They are consistent with the approach set out in policies RT-D1 to RT-D12 and the principles set out in policies CE-S5 and CE-S6 for the re-use of existing traditional and non- traditional buildings.**

SERVICED ACCOMMODATION

CONTEXT

- 9.21. Serviced accommodation is more generally referred to as Bed & Breakfast (B&B) establishments, guesthouses and hotels and forms a considerable proportion of the visitor accommodation available in the National Park. The national Quality in Tourism³⁹⁹ rating and classification of accommodation for VisitEngland states that hotel accommodation has a minimum of five letting bedrooms, is licensed and offers dinner – all bedrooms are en-suite or have a private bathroom. The proprietor or staff should be available during the day and evening (as a minimum) to receive guests and provide services⁴⁰⁰. Guest house accommodation is generally smaller than hotels with a less structured service providing for more than six paying guests and run on a more commercial basis than a B&B – more services such as dinner are provided by staff as well as the owner. Where the primary use of the property is for guest accommodation such as guesthouses and hotels – the use class is C1.
- 9.22. If the primary use of a building is a private dwelling house the use class is C3 and B&B accommodation may be provided. B&B accommodation is run by the owner with more of a family home feel and approach. As B&B accommodation is generally ancillary to the primary residential use of the dwelling, planning permission for a material change of use is only required if the essential residential nature of the property has changed – i.e. the guest accommodation ceases to be ancillary. Other factors such as the suitability of parking provision and impact upon neighbours' amenity are also likely to influence a decision about whether a material change of use is necessary.
- 9.23. Many hotels and guesthouses on Exmoor have historic provenance; built primarily for the purpose of providing guest accommodation. This is particularly relevant in locations such as Lynton & Lynmouth that became popular as a visitor destination in the 19th century, where a number of hotels were established from that time to meet demand. Other hotels and guesthouses across Exmoor were centred on the popularity of the area for field sports.
- 9.24. Hotels and guesthouses continue to be established in the National Park and contribute towards providing a unique experience for visitors to Exmoor. Extensive consultation highlighted that hotels and guesthouses, provided through changing the use and converting existing buildings, was suitable in many locations across the National Park. Existing buildings provide an opportunity for new serviced accommodation without the need for building new premises, which are considered to be less appropriate given the National Park designation and the potential scale of such development. The occupancy evidence available does not appear to support a need for new-build accommodation, however small scale extensions to existing serviced accommodation premises may enable the improvement to the overall quality and/or capacity over the longer term. For some proprietors owning and running a hotel or guesthouse is a lifestyle choice and, although they may operate at full business capacity during the peak season, they may not be at full occupancy, as the majority are micro-businesses employing no additional staff⁴⁰¹.

SERVICED ACCOMMODATION CONSIDERATIONS

- 9.25. The following policy provides for new serviced accommodation through the change of use of existing buildings where it should not result in significant alteration or extension and should have regard to cultural heritage policies (CE-S4 and CE-D3) and the principles for the conversion or structural alteration of traditional buildings policy (CE-S7). Any extension to existing premises should be subservient to the existing building/complex and appropriate in terms of materials, scale and massing with the host building (CE-S7). Extensions for staff accommodation should have regard to policy RT-D2 Staff Accommodation.
- 9.26. Following consultation⁴⁰², it is considered that there should be flexibility to enable new hotels and guesthouses to come forward, particularly those created from an existing residential use. Where permission is granted for a residential dwelling (use class C3) to change use to serviced accommodation under this policy (RT-D1) provision will be made by attaching a condition, to

³⁹⁹ Quality in Tourism (QiT) - the assessment service provided for VisitEngland. <http://www.qualityintourism.com/asp/letsgetassessed.asp>

⁴⁰⁰ VisitEngland Hotel Accommodation – Quality Standard 2011

⁴⁰¹ Exmoor National Park State of Tourism Report 2008 (2008 Survey of Exmoor Tourism Businesses)

⁴⁰² Your Future Exmoor consultation events and topic group meeting 2010

enable the use to revert to a dwelling house use in the future. In this particular situation, any extension to increase the floorspace of the hotel/guesthouse should not exceed 35% of the original floorspace of the property, in accordance with HC-D13 Residential Extensions – a condition will be attached in the granting of any permission to remove permitted development rights to prevent further extension when the use reverts to a dwelling house. If extensions to the hotel/guesthouse exceed the 35% proportion, then the property will not automatically be able to revert back to a dwelling house and proposals for change of use would need to meet the tests set out in RT-D3 Safeguarding Serviced Accommodation.

RT-D1 SERVICED ACCOMMODATION

- 1. Proposals for the provision of new serviced accommodation through the appropriate change of use and conversion of existing traditional buildings will be permitted where all of the following are met:**
 - a) the traditional character, appearance and setting of the building or building group is conserved or enhanced (CE-S4, CE-D3, CE-S5); and**
 - b) the building or building group is capable of conversion to serviced accommodation and any other ancillary requirements without significant alteration or extension (CE-S5); and**
 - c) the design layout of access and parking requirements are compatible with landscape character and built heritage (AC-S3); and**
 - d) the intensity of use does not compromise local amenity; and**
 - e) traffic generation can be accommodated by the local road network without adversely affecting road safety and capacity.**
- 2. Small scale extensions which are subordinate to existing serviced accommodation will be permitted in accordance with policy CE-S7 to improve the quality or capacity of the accommodation.**
- 3. In relation to proposals that seek a change of use from a residential dwelling (use class C3) to serviced accommodation (use class C1) a condition will be attached to a permission to enable the property to be used either as C1 Hotels or C3 Dwellings.**

STAFF ACCOMMODATION

CONTEXT

- 9.27. Some serviced accommodation businesses including hostels, may require staff accommodation in certain situations e.g. where they need to meet or maintain a certain quality standard for 24 hour service, or where staff are not employed locally.
- 9.28. Applicants should provide evidence to support any application for staff accommodation to show that alternative accommodation cannot be found in the local area, or be provided within the hotel premises. In circumstances where additional staff accommodation is needed, it should be through the reuse of existing buildings on the premises, or where this is not possible, a small-scale extension that is subordinate to the existing property could be provided. Independent, free-standing new build premises will not be permitted for such purposes. There will be no opportunities for successive conversions or extensions for the purposes of staff accommodation, although staff accommodation that is no longer required may be permitted to change to extended guest accommodation, a non-serviced holiday let accommodation unit, or a dwelling to meet local affordable housing need.

RT-D2 STAFF ACCOMMODATION

1. Proposals for staff accommodation will only be permitted where it can be demonstrated that such accommodation is not available in the locality or cannot be provided within the existing hotel, guesthouse or hostel. Where this need cannot be met provision for staff accommodation will be permitted through:
 - a) the change of use and conversion of existing buildings that are within the curtilage in accordance with policies CE-S5, CE-S6 and CE-S4; or where this is not possible;
 - b) a small-scale extension to the hotel or guesthouse as a self-contained annexe.
2. Staff accommodation will be tied through a condition or planning obligation to the existing premises, to ensure that it cannot be sold separately or occupied as a separate accommodation unit – other than for staff or owners.
3. Where there is evidence that the need for staff/owner accommodation is no longer required, it shall only be replaced by: a local occupancy tie to meet local affordable housing needs (HC-S1); non-serviced holiday-let (RT-D4); or extension of guest accommodation. No further extension will be permitted for staff accommodation on premises where the previous staff accommodation has been lost to other uses.

SAFEGUARDING SERVICED ACCOMMODATION**CONTEXT**

9.29. Although some new hotels and guesthouses have been permitted through the change of use of existing buildings in recent years, a larger number have been lost to residential use, through demonstrating that the business could not be made viable in the longer term. It is important, where ever possible, that existing serviced accommodation is safeguarded over the long term as in many villages and in the open countryside they not only provide an economic benefit, but also a social function, for example: by having a public bar, function room or skittle alley. For the purposes of safeguarding serviced accommodation this policy will also apply to Youth Hostels. Where such a business is lost, it can have both economic and social implications for the local community. Furthermore, once lost, experience shows that they are unlikely to be replaced.

CHANGE OF USE CONSIDERATIONS

- 9.30. Any material change of use from serviced accommodation should in the first instance be to another business/employment use within the existing building – including residential institutions such as nursing homes (policy HC-S8).
- 9.31. If permission is granted for a residential dwelling to change use to serviced accommodation in accordance with Policy RT-D1 of this Local Plan there are provisions to then enable the property to revert back to residential use with no requirement for planning permission (see paragraph 9.26). It is hoped that this policy approach will encourage new hotels and guesthouses to continue to come forward, without the uncertainty of not being able to revert back to residential in the future if the venture is unsuccessful.
- 9.32. In certain circumstances, where a change of use is sought from an existing hotel or guesthouse (C1 use) to residential (C3 use), it is considered that a flexible approach may be beneficial where the hotel/guesthouse could revert to residential use as a principal residence home (policy HC-S5) without having to demonstrate that the existing serviced accommodation use cannot be continued or made viable by way of marketing. In such cases, the applicant will need to satisfy all of the tests below and provide evidence to demonstrate that the property:
- a) Was a single unit built for residential use and either existed as residential use on 1st July 1948 (when the 1947 Town and Country Planning Act was introduced) or was built as a residential property after this date - and can easily revert to a single residential unit providing a satisfactory living environment.

- b) Any alterations and/or extensions to the property since its hotel/guesthouse use is commercial have not exceeded would not meet the details of policy HC-D13 Residential Extensions.
 - c) No community service or facility is provided by the premises – including public bar. The National Park Authority will require evidence of whether the current owner has closed such facilities prior to making an application for the change of use.
- 9.33. If all of these tests are met it is considered that these premises can revert to residential use without having to demonstrate that the existing serviced accommodation use is unviable. In the interests of ensuring flexibility and the needs of future tourism trends it is considered that those hotels/guesthouses that meet the tests to revert to a principal residence home, will have conditions attached to their planning permission to enable the use of their property to be principal home (policy HC-S5) or serviced accommodation if the property remains as a single unit.
- 9.34. Where a change of use other than business/employment use is sought, or the property does not meet the tests outlined in paragraph 9.32 above (clause 1b) of policy RT-D3), the National Park Authority will require the hotel or guesthouse to demonstrate that the business cannot be continued or made viable. Evidence will be required to support such proposals and will include details of business performance and professional management, evidence of attempts to save the business, and proof of marketing. Evidence of marketing required to support the proposal should include:
- a) The property has been marketed for sale at a reasonable value that is consistent with its recent trading performance (or hotel market value if trading has ceased) for a period not less than 12 months. The guide price should reflect the potential earnings of the business and the cost of essential works;
 - b) Advertisement on site, in local newspapers, estate/property agents and, or otherwise as requested by the National Park Authority;
 - c) Re-advertising the premises (as above) at three month intervals if they fail to succeed in finding a willing buyer/occupier in the first three months of marketing;
 - d) The owner/applicant to supply the National Park Authority with the advertisement details including sales particulars with a guide price to reflect the market value of the hotel/guesthouse;
 - e) The owner/applicant to have provided the National Park Authority with written evidence of all enquiries received and the reasons why potential buyers/occupiers found the hotel/guesthouse to be unsuitable; and
 - f) To provide impartial evidence regarding viability and marketing of the property. An independent valuation of the property will be required from the District Valuation Office to inform the decision-making process.
- 9.35. The most favourable approach would be to diversify the business through the partial change of use of the building to non-serviced accommodation apartments (RT-D4), another employment use, community service/facility, or to meet local housing needs. A full change of use will be considered where the partial change of use would not be possible or feasible in terms of viability or other material planning considerations.
- 9.36. Additionally, there may be an opportunity to increase the range of accommodation on the site through provision of small scale alternative camping accommodation (see RT-D9 Alternative Camping Accommodation).
- 9.37. Where an applicant is seeking a change of use from serviced accommodation to residential, proposals should reflect the requirements set out in the policy below, in accordance with the housing policies in Section 7 Thriving Communities For clause 3 of Policy RT-D3, whether a building is able to accommodate more than one dwelling unit, will be judged on the basis of a maximum net internal floorspace of 90 square metres or less.

RT-D3 SAFEGUARDING SERVICED ACCOMMODATION

- 1. Development proposals that would involve the loss of existing serviced accommodation will only be permitted where:**
 - a) Other business/employment uses are to be created in the existing building; or**
 - b) The use can change to a residential principal residence dwelling (HC-S5) where evidence clearly demonstrates that:**
 - i) the use was formerly a single residential dwelling on 1st July 1948 or built as a single residential dwelling subsequently; and**
 - ii) there has been no excessive alteration or extension; and**
 - iii) the existing use does not provide an additional community service or function.**
- 2. For all other proposals relating to the change of use of serviced accommodation:**
 - a) It can be demonstrated that the current use of the building as serviced accommodation cannot be continued or made viable in the longer term and the property has been marketed as a going concern at a reasonable value for a minimum period of 12 months.**
 - b) In respect of 2.a), an independent valuation of the building will be required. Proposals which provide opportunities for the partial change of use of the building /complex that supplements the existing serviced accommodation will be favoured over full change of use where it is compatible with the cultural heritage of the existing building (CE-S4), local character and amenity. Changes that will be considered acceptable in principle include:**
 - i) Change of use to self-catering apartments (policy RT-D4).**
 - ii) Change of use to provide community services or facilities (HC-S7).**
 - iii) A mixed use development, based on the uses listed above including employment use.**
 - iv) Change of use to residential dwellings should meet the tests in clause 3 below.**
- 3. For hotels that are able to accommodate more than one dwelling unit, the proposal must address an identified local housing need and be affordable with occupation restricted to local people in perpetuity, unless it can clearly and robustly demonstrate to the satisfaction of the National Park Authority that:**
 - a) it is not financially viable, although the intention will still be to maximise the proportion of affordable homes within viability constraints (in accordance with clauses 3, 5 and 6 of policy HC-D1); or**
 - b) it would provide more affordable homes than are needed in the parish and the adjacent parishes, now and in the near future (in accordance with the criteria under clause 7 of policy HC-D1).**

NON-SERVICED ACCOMMODATION

CONTEXT

- 9.38. Non-serviced or self-catering accommodation is a popular form of visitor accommodation that provides a wide range of accommodation choice for visitors to the National Park including holiday cottages (for static caravan and chalet developments – see policy RT-D8). However this form of accommodation has also caused local issues where a high percentage of existing homes are used as holiday cottages – this has particularly affected some popular holiday destinations such as Lynton & Lynmouth and smaller settlements where the impact of a relatively small number of holiday cottages can significantly affect the vitality of the local community.
- 9.39. The local planning authority cannot directly control or influence the use of existing open market homes as holiday cottages although it is recognised that in some areas this would be particularly supported by local communities. Planning can only control the change of use and conversion of existing buildings to holiday accommodation or the development of new units – however within the National Park, given the number of self-catering premises already available and the stock of existing buildings with capacity for change of use or conversion, it is considered that new build holiday-let accommodation is not appropriate in terms of the statutory designation of the National Park.
- 9.40. In circumstances where self-catering complexes (a property where there is more than one holiday let unit with a holiday occupancy condition) may wish to expand, the creation of additional units and the small scale extension of existing units, through the conversion of existing buildings, may be allowed to improve the capacity and/or quality of existing accommodation – where this will not detrimentally affect the character or historic interest of the building(s). Self-catering complexes may also have the capacity to diversify the type of accommodation they offer through provision of alternative forms of accommodation (see RT-D9 Alternative Camping Accommodation). Extension of existing holiday-let units or diversification can increase non-serviced accommodation capacity during the main tourist season where availability is at its lowest⁴⁰³.
- 9.41. The change of use and conversion of existing buildings to holiday let accommodation will be subject to CE-S5 and CE-S6 which provide principles for the conversion and alteration of buildings and will only be permitted where it relates to: RT-D3 Safeguarding Serviced Accommodation in terms of the partial/full change of use of a hotel that has demonstrated that it cannot be made viable or continued in the longer term; the re-use of redundant buildings within hotel premises; or the diversification of a rural land-based business (para. 8.35). Proposals should also ensure that there is adequate utility provision close by including adequate access, and where the capacity of the local road network is not compromised.
- 9.42. The conversion of traditional farm buildings to holiday lets is a popular form of farm diversification. These rural buildings have historic significance, interest and sensitivity; therefore it is important that the whole farmstead complex of traditional buildings is not converted to ensure the retention of some of the original vernacular form and character of these traditional buildings – this will be decided on a case by case basis. This approach also enables space for ancillary storage, utility, or continuing agricultural use, and avoids the pressure for additional new build development in the future.
- 9.43. The evidence for occupancy levels is limited for this type of accommodation within the National Park. However policies in this Local Plan enable flexibility regarding ongoing use of such accommodation over the long term, not only through extension and diversification, but through change of use and variation of occupancy. Therefore if a holiday-let is no longer needed or viable according to changing circumstances, the use could be changed to a business or community use where it meets the requirements of the relevant policies. Holiday-lets fall within the same use class as a dwelling house, but the occupancy is controlled by condition so that it cannot be permanently occupied by a single person or household – permission to change the occupancy to housing that meets local affordable needs or for extended family members may be permitted where it meets the requirements of policy HC-D11 – this policy may also allow proposals to revert the unit to holiday accommodation if required in the future. This flexibility

⁴⁰³ STEAM Report 2010

will help to maximise the use of a unit over the long term to meet the needs of the local economy and community.

- 9.44. Some non-serviced accommodation units may be over 90sqm and in such cases where there is a proposal to change the occupancy to housing that meets local affordable needs, a further condition will be attached to ensure that the property is not sold separately and remains as part of the wider complex or building group.
- 9.45. Conditions will be attached to any planning permission for holiday-let accommodation to limit the occupancy to short let holiday purposes only, so that the property may only be occupied by any person for a period not exceeding 28 days in any calendar year. This ensures that holiday lets are available all year round, rather than seasonally and helps to reduce the seasonality of demand on Exmoor. The conditions will also expect owners to maintain a register of occupants for each calendar year that may be inspected on request to ensure that such accommodation is not being permanently occupied as a dwelling house.

RT-D4 NON-SERVICED ACCOMMODATION

- 1. Proposals for the change of use and conversion of buildings to non-serviced accommodation will be permitted where they:**
 - a) create additional unit(s) on an existing self-catering complex;**
 - b) accord with RT-D3 Safeguarding Serviced Accommodation clause 2b);**
 - c) reuse a redundant building associated with a hotel/guesthouse premises; or**
 - d) relate to the diversification of a rural land-based business.**
- 2. Proposals should also meet the following principles:**
 - a) the character and appearance of the building and its setting is conserved, and where they accord with policies on landscape character, cultural heritage and design (CE-S1, CE-S4, CES5 and CE-S6);**
 - b) in respect of changing the use of traditional farm buildings, the entire range of such buildings within a farmstead, will not be permitted to be converted to protect the historic character and significance of the buildings collectively;**
 - c) the design and layout of access and parking requirements are compatible with landscape character and built heritage, and the local road network has capacity to service the accommodation without adversely affecting road safety (AC-D1, AC-S3); and**
 - d) there are no adverse impacts on tranquillity and local amenity.**
- 3. Small scale extensions and alterations will be permitted to improve the quality and viability of existing non-serviced accommodation; where it would not adversely affect the historic character of the existing building (CE-S7). No new build units of holiday-let accommodation will be permitted.**
- 4. Where a non-serviced accommodation unit is no longer needed or viable a proposal to replace the holiday occupancy condition of the unit with an agreement limiting occupancy to meet a local affordable need for housing or housing for extended families will be considered in accordance with policy HC-D11. In respect of changes to business or community use, proposals should accord with the relevant policies in the plan.**

TENTED CAMP SITES

CONTEXT

- 9.46. Tented camp sites and camping barns offer more affordable forms of visitor accommodation in the National Park, providing wider opportunities for people to visit and experience Exmoor.
- 9.47. Camping on tented camp sites remains a popular form of visitor accommodation on Exmoor and is generally seen to be compatible with National Park purposes. There are a number of established small-scale camp sites across the National Park that range in type from backpacker campsites with few or no facilities to more established sites that offer a greater range of facilities such as toilet/shower blocks, laundry rooms, and play areas. Tented camp sites are, for the purposes of this policy (RT-D5), defined as sites where tents are brought on to the site and erected by people staying there; where there is no degree of permanence and with no facilities within tented structures such as toilets, drainage, and water supply.
- 9.48. Site requirements for tented accommodation tend to have less visual impact than touring caravan sites, due to less rigid landscaping requirements and layouts for pitches etc. However, the location, siting, access and layout of such sites will require particular consideration including in terms of visual impact, compatibility with landscape character and wildlife interests, accessibility and local amenity.
- 9.49. In terms of the provision of facilities for campsites, preference will be given to the conversion and change of use of traditional buildings and proposals must comply with policy CE-S5 Principles for the Re-use of Traditional Buildings. Where there are no traditional buildings present or if they are unsuitable in terms of capacity or their wildlife/historic interest, then conversion of non-traditional buildings may be considered with regard to policy CE-S6 Principles for the Re-use of Non-Traditional Buildings. In such cases provision for sewage disposal should accord with policy CC-D6 to ensure that water quality is safeguarded.
- 9.50. Conditions to ensure that the site is only occupied through the main holiday season will help to protect the local environment and to allow site to recover from any intensive camping use through the holiday season. Small scale extensions may be permitted to allow the campsite to improve viability or where appropriate diversify part of the site to alternative camping accommodation (see RT-D9) – environmental enhancement should be demonstrated as part of the proposal including biodiversity enhancements (CE-S2). This may also help vulnerable sites relocate out of sensitive areas including those at risk of flooding (CC-D1 Flood Risk). Where part of a site is relocated the existing area should be reinstated to its former use or included as part of a wider environmental enhancement scheme on the site.

RT-D5 TENTED CAMP SITES

- 1. Proposals for new small-scale tented campsites will be permitted where:**
 - a) They are well related to a named settlement, hamlet or farmstead.**
 - b) They are sensitively sited to ensure there are no adverse impacts on landscape character, visual amenity, or sensitive wildlife species and habitats.**
 - c) There is existing road access, and sufficient road capacity to serve the development.**
 - d) They are not located within an area at risk of flooding (CC-D1)**
- 2. Any facilities that may be required to service the campsite can be provided through the conversion of suitable existing traditional buildings consistent with policy CE-S5 and policy CE-S4 Cultural Heritage. Where such buildings are not suitable or available then the following opportunities may be sought:**
 - a) the conversion of structurally suitable non-traditional buildings that are functionally redundant (CE-S6); or**
 - b) the extension of existing buildings in accordance with the relevant policies in this plan.**
- 3. Opportunities for small extensions to existing campsite areas will be permitted where it does not conflict with principles listed above, and where environmental benefits are included as part of the scheme.**

CAMPING BARNs

CONTEXT

- 9.51. Camping barns are also often referred to as bunkhouses, backpacker accommodation and hostels. They usually provide very basic accommodation and in more isolated locations very few facilities are provided apart from basic shelter; these are often referred to as 'stone tents'. There are very few camping barns on Exmoor, especially those which are available to the wider public – some remote hostels for example are owned by organisations or private charitable trusts. Camping barns include those well-established facilities at Northcombe Farm near Dulverton and Woodadvent Farm near Roadwater, and two Youth Hostels (Exford and Minehead) within the National Park. Opportunities exist for a network of this type of accommodation to be created, particularly close to existing long distance trails such as the South West Coast Path and Two Moors Way.
- 9.52. This form of accommodation can bring redundant traditional farm buildings back into use, whilst allowing the integrity and historic fabric of the building to be preserved; proposals should have regard to the use of traditional materials for the repair and reinstatement of these buildings (see CE-S5 Principles for the Re-use of Traditional Buildings). Where traditional barns are located in a farmstead or building group it is relatively straightforward to access and provide modern services and utilities underground as these will normally be accessible close by; this may allow a broader range of facilities and improved quality of accommodation (e.g. hostel type accommodation) subject to considerations to conserve the historic character of the building.
- 9.53. Isolated barns are important features in the landscape and their original fabric and setting should be retained as significant elements of their built form and their contribution to the wider landscape character; so that even when it has been adapted to a new use the visual appearance remains as an isolated barn. To ensure that the conversion of isolated barns to camping barns does not detrimentally impact on their character, form and setting, no access tracks, parking areas or curtilage should be created. Maintenance of these facilities should be minimal; therefore utility services should only be provided on-site through sustainable measures such as composting toilets, if they can be accommodated discreetly. To ensure isolated camping barns are accessible, they should be located close to the rights of way network or access land.

RT-D6 CAMPING BARNs

- 1. Proposals for the change of use and necessary alteration of a traditional building to a camping barn or hostel accommodation will be permitted where it complements the historic character and appearance of the building, biodiversity interests, and its setting within the landscape in accordance with policies CE-S1, CE-S2, CE-S4 and CE-S5.**
- 2. Where the existing building is in a farmstead or hamlet in close association with an existing dwelling, or in a named settlement:**
 - a) parking and access arrangements should be incorporated within the hamlet/farmstead without detrimentally impacting on landscape character and visual amenity; or**
 - b) in a settlement is consistent with policies AC-D1 and AC-S3; and**
 - c) utility and service supplies will be routed underground (AC-D5).**
- 3. The change of use and conversion of a traditional barn or building in an isolated location to provide basic shelter in a camping barn (stone tent) with limited facilities for walkers, will only be permitted where it can be demonstrated that:**
 - a) the building can be managed effectively without new access provision;**
 - b) the proposal does not involve alterations to the external fabric and surroundings of the building that would materially affect the character or appearance of the building and its setting;**
 - c) the building is well related to the rights of way network or access land; and**
 - d) any bat and barn owl roosts that may be present are maintained or replaced.**

CERTIFICATED CARAVAN AND TOURING CARAVAN SITES

CONTEXT

- 9.54. Certificated caravan sites are small sites that are reserved exclusively for members of certain caravan and camping organisations. Under planning law these organisations can issue a certificate for these sites to temporarily site up to five touring caravans or motor-homes, without requiring planning permission⁴⁰⁴. They also inspect the sites to ensure that they meet basic requirements such as: a reasonably level site, safe highway access, drinking water, waste disposal and provision of disposal facilities for chemical closets.
- 9.55. Small certificated caravan sites will be encouraged where they are well integrated in the landscape, and avoid site improvements such as hard-standing and utility hook-ups which would require planning permission including changing the of use of the land. These smaller sites will help to ensure that Exmoor continues to offer a diverse range of holiday accommodation which provides farms and other rural enterprises with opportunities for diversification.
- 9.56. The National Park Authority is consulted before any certificate is issued to the landowner and will support proposals that are compatible with landscape and highway requirements and the wider National Park objectives. Proposals should particularly avoid areas at risk of flooding and avoid disturbance of sensitive wildlife species and habitats including otter holts.
- 9.57. New commercial touring caravan sites are considered to be inappropriate within the National Park, due to the significant visual impact they can have on landscape character as a consequence of the degree of landscaping required to enable sites to accommodate the modern requirements of touring caravan parks; including access, parking, level pitches with hard-standing and associated utility and drainage provision. The adverse landscape impact is therefore considerable with or without caravans on the site. Consequently extensions to existing touring caravan sites or the provision for outdoor caravan storage facilities are also considered to be inappropriate in the National Park. Additionally Exmoor's road network has a high proportion of narrow, single track lanes that limits opportunities for such development, as they are generally unsuitable and impractical for towed caravans and large motor-homes to navigate safely.

RT-D7 CERTIFICATED CARAVAN & TOURING CARAVAN SITES

1. **New certificated caravan sites will be supported in the National Park where:**
 - a) **they are well-sited and integrated in the landscape and closely related to existing building groups or settlements, with appropriate landscape screening where necessary;**
 - b) **they are in a location where there are no adverse impacts on sensitive wildlife species and habitats;**
 - c) **access and parking requirements can be easily accommodated without adversely impacting on landscape character and the historic environment;**
 - d) **new permanent buildings, site excavation or other site improvements will not be required; and**
 - e) **they are not located in an area at risk of flooding (CC-D1).**
2. **Proposals for new touring caravan sites, outdoor caravan storage facilities, or extensions to existing touring caravan sites will not be permitted.**

⁴⁰⁴ Caravan Sites and Control of Development Act 1960 – First Schedule, paragraph 5.

STATIC CARAVAN SITES

CONTEXT

- 9.58. There are very few static caravan sites found within the National Park. Those that do exist are generally small scale and have operated for a number of years.
- 9.59. Due to their colour, materials, form, uniform layout and permanency, static caravan sites often appear incongruous in the landscape, and can be detrimental to landscape and settlement character. Such forms of development are considered to be inappropriate within the National Park and will therefore be resisted. Opportunities to improve existing sites through reducing their overall visual and environmental impact by appropriate replacement accommodation units will therefore be encouraged. These sites should not be in an area with a high probability of flooding (flood zones 3a and 3b⁴⁰⁵) – see policy CC-D1 Flood Risk.
- 9.60. It is considered that static caravan sites could be replaced by appropriately designed holiday accommodation such as single-storey timber chalets, camping pods, yurts, traditional Romany caravans or similar structures which offer alternative forms of holiday accommodation (policy RT-D9 Alternative Camping Accommodation). The proposals should demonstrate an overall visual and environmental improvement in terms of form, layout, materials, colour and landscaping, in accordance with policies CE-S1 Landscape Character and CC-S7 Design and Sustainable Construction Principles. A reduction in the overall number of units/pitches will be expected where there are three or more static caravans on the site and the restoration of pitches should provide a benefit for wildlife. In terms of new chalet/log cabin holiday accommodation; these structures will only be permitted where they replace units on existing static caravan sites or chalet developments.
- 9.61. All forms of non-serviced/self-catering holiday accommodation will have a seasonal or holiday occupancy condition attached to any permission that may be granted to ensure that the unit(s) can only be occupied for holiday purposes⁴⁰⁶.

RT-D8 STATIC CARAVAN SITES

- 1. Proposals for new static caravan sites and chalet developments for the purposes of holiday accommodation, or the conversion of existing touring caravan sites for such uses, will not be permitted.**
- 2. Development proposals to improve the quality of existing static caravan sites and chalet developments through appropriate replacement forms of holiday accommodation may be permitted where:**
 - a) replacement holiday accommodation is of high quality sustainable design and the materials, colour, form, siting and landscaping positively relate to landscape character (sites with three or more static caravans will be expected to reduce the overall number of units/pitches);**
 - b) there is no intensification of use or activity, and the site is retained as a single business unit;**
 - c) the existing site area is not extended;**
 - d) the relocation of existing pitches to less sensitive areas to provide environmental enhancement is achieved and where the number of pitches is not increased;**
 - e) there is no increase in facilities or services required for the site; and**
 - f) the site is not located in an area with high probability of flooding (CC-D1).**
- 3. New timber chalet or log cabin holiday accommodation will only be permitted where they replace units on existing static caravan sites or chalet developments.**

⁴⁰⁵ Flood zone 3a: comprises land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%) or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year.

Flood zone 3b: comprises land where water has to flow or be stored in times of flood (functional flood plain) – as identified in the Exmoor and West Somerset Strategic Flood Risk Assessment Level 1 (2009).

⁴⁰⁶ Circular 11/95 Use of conditions in planning permission

ALTERNATIVE CAMPING ACCOMMODATION

CONTEXT

- 9.62. Consultation evidence supported a diversity of accommodation provision⁴⁰⁷ in the National Park. Alternative forms of camping accommodation have become more popular, offering a range of different holiday experiences. Enabling the provision of such accommodation may lead to a wider range of visitors to the National Park that benefits the local tourism economy.
- 9.63. This form of accommodation, includes structures which generally are considered to be ‘movable’ or easily dismantled (usually considered under case/planning law as a caravan or tent), however they tend to vary in terms of their materials and form and in some cases are likely to remain ‘on site’ permanently. Examples include timber camping pods, micro-lodges, traditional Romany caravans, shepherd huts, tree-houses, yurts, wigwams and teepees – these structures provide a ‘niche’ form of low-impact visitor accommodation that have limited physical connection to the ground.
- 9.64. The visual appearance in the landscape is one of the most significant impacts that such proposals are likely to have in terms of their arrangement and uniform appearance. However, alternative forms of accommodation can be more sympathetic in terms of colour and materials (e.g. timber) than static or touring caravans and proposals should ensure they are well designed, sensitively sited, and the overall number of structures remains low. The National Park Authority considers that structures can be more effectively screened in the wider landscape, when set against or within mature woodland or well-treed areas. Opportunities for site enhancement through the design and management of the site and associated planting e.g. for screening, will be encouraged (CC-S2 Biodiversity, CE-S3 Green Infrastructure and CE-D2 Green Infrastructure Provision).
- 9.65. Concrete pads or bases for the floor area of these structures are not considered to be acceptable. Timber platforms or decking which can be easily removed from the site, if required, are more aesthetically pleasing and have less impact on the ground surface. Careful consideration should also be given to the design and use of materials used for pathways leading to or between structures in terms of the colour and degree of permanence – light/contrasting colours and uniform paving should be avoided.
- 9.66. To avoid these temporary structures being considered as dwellings or mobile homes within the National Park (and therefore would be considered under more stringent policies of countryside restraint), such structures should provide basic holiday accommodation similar to that described under ‘tented’ camp sites (see policy RT-D5). These holiday accommodation units should have an internal floor space no larger than 25sqm and should only provide basic facilities for sleeping, seating and eating without installation of water services or provision of drainage facilities for washing and WC/showers included. This ensures that such structures do not generate a level of permanence that could increase the degree of landscape impact and site restoration should removal of structures be required. Additional facilities (if not already present) should be provided separately from the accommodation unit, as they are on camp sites, through the change of use and alteration of suitable existing buildings or as an extension to existing facilities to service the need of additional visitors (i.e. where visitor numbers are increased on site by the proposal rather than maintained at a similar level).
- 9.67. The policy allows for ‘small-scale’ alternative camping proposals as a diversification opportunity for existing accommodation providers and land-based businesses. It is not considered to be appropriate to set a maximum figure for the number of such structures – small-scale proposals will be determined by the National Park Authority in relation to factors including the scale of the existing accommodation enterprise, landscape character and/or the relationship with existing buildings and structures.
- 9.68. Alternative forms of camping accommodation could replace existing static caravans on sites where associated facilities are already present and where it can be demonstrated that the landscaping, siting, design and materials of the proposed structures are appropriate (see policy RT-D8). Alternative ‘camping’ experiences may also be permitted as diversification for land-based businesses or a diversification of accommodation offered by existing camping and caravan sites, hotels/guesthouses (C1 use) and self-catering complexes (where there is more than one holiday let unit with a holiday occupancy condition); with the intention of helping to

⁴⁰⁷ Tourism Topic Group discussion (2010)

strengthen and sustain rural tourism businesses. Bed & Breakfast businesses which operate within a residential dwelling (C3 use) will not be permitted to diversify in this way to avoid the proliferation of such structures within any residential curtilage. Proposals should be physically and functionally linked to an existing business, and not require the need for additional permanent residential accommodation, including staff accommodation. In all cases such structures should not be located in an area with a high probability of flooding. As they are sites with temporary structures used for holiday occupation then they would be classified as 'more vulnerable' subject to a specific warning and evacuation plan. The sequential and exception tests should also be applied (see policy CC-D1 Flood Risk)⁴⁰⁸.

- 9.69. The scale of the overall proposal should minimise the need for additional parking capacity through the extension of existing parking areas or creation of new parking facilities – particularly where greenfield land is utilised. Other approaches such as encouraging sustainable forms of transport (AC-S1) or informal/temporary parking arrangements (AC-D3) may provide alternative solutions to increasing parking capacity. In circumstances where the need for additional parking provision can be demonstrated, the scale should only meet the minimum parking requirement in relation to additional visitor numbers generated and not cause unacceptable harm to the National Park or its special qualities. Additional need for parking should not be generated where the proposed structures are replacing existing pitches for static caravans, chalets or touring caravans.
- 9.70. In terms of extensions to existing parking areas, the design should be well integrated with its surroundings in terms of landscaping, surface treatments and layout. For new parking arrangements, proposals should be well-related to existing buildings and make best use of any existing hard-standing. The creation of separate parking bays adjacent to the accommodation structure is not acceptable due to the increase of likely landscaping works and impacts on visual amenity and landscape character. Where the use of greenfield areas are proposed, the design of parking arrangements should reflect and respond to landscape character; utilising locally sourced low-impact natural materials for surfacing. More permanent and impervious man-made surface treatments (e.g. tarmac or concrete) should be avoided.
- 9.71. Conditions will also be attached to any planning permission to ensure that:
- Occupation is limited to holiday use only and the structure will not be used as a permanent residence;
 - Where structures become redundant they are removed and the site is reinstated to its former use;
 - Only the approved structures are placed on the application site and external finish and colour are maintained;
 - No fences, buildings or ancillary structures are erected without further granting of planning permission;
 - Any planting or landscaping schemes are in place prior to siting the structures, and existing landscape features retained. Alterations to the landscaping / planting scheme permitted would be subject to the written approval of the local planning authority.

⁴⁰⁸ National Planning Policy Framework Technical Guidance (Table 2) – (DCLG) 2012

RT-D9 ALTERNATIVE CAMPING ACCOMMODATION

1. Small-scale, low impact alternative camping accommodation proposals will be permitted where:
 - a) they are only used for the purposes of holiday accommodation;
 - b) the overall development is small-scale in terms of area and number of units and will not require additional permanent residential accommodation to manage the site;
 - c) the net floor space of each unit is less than 25sqm and will not be connected to a water supply or drainage facility;
 - d) they are of high quality sustainable design and demonstrate that the siting and landscaping strongly relate to the landscape and historic character of the area; and is appropriate to its setting (locations that are well screened by woodland or well-treed settings are preferred and should meet the tests in this policy);
 - e) there are no adverse impacts on sensitive wildlife species and habitats;
 - f) they have low environmental impact through avoidance of site treatments including excessive areas of hard-standing, site levelling, re-profiling, and fencing; and have limited physical connection with the ground;
 - g) the need for additional facilities is clearly demonstrated and commensurate with the level of anticipated need, are provided within an existing building or as a modest extension to existing facilities; and
 - h) where the need for additional parking is demonstrated, provision should reflect the minimum level of need.
 - i) Small-scale extensions to existing parking areas should be well designed, landscaped and integrated with the site and its setting.
 - ii) New parking provision should be well related to existing buildings and make use of existing hard-standing where possible. On greenfield areas, parking should reflect landscape character, be informal in layout, and avoid permanent impervious surface treatments.
 - iii) Separate parking bays adjacent to the proposed accommodation structures should be avoided.
2. The site is located outside areas with high probability of flooding (CC-D1), and:
 - a) where proposals meet the requirements of RT-D8 to replace existing units on static caravan sites; or
 - b) as part of a diversification proposal for land-based businesses, sited close to the farmstead and where additional site facilities can be provided through the change of use of existing buildings(CE-S5, CE-S6); or
 - c) as part of a diversification proposal for existing accommodation premises comprising hotels/guesthouses (C1 use), self-catering complexes, and camping and caravan sites; where there is capacity in terms of area, highway access, and existing facilities without impacting on local amenity.
3. Conditions will be attached to any permission to ensure that the site will be occupied and managed in a manner that will not harm the local area. Structures will be removed from the site should they become redundant to the approved use, and the site restored to its former condition - opportunities should be taken to enhance the restoration of the site that will support biodiversity and green infrastructure (CE-S2, CE-S3).

RECREATIONAL DEVELOPMENT

PURPOSE OF POLICY

- 9.72. Exmoor is ideally suited to recreation pursuits that are based on its natural assets including walking, horse riding, cycling, watersports and interest in its natural beauty including wildlife watching and coastering (RT-D11 Equestrian Development; RT-D12 Public Rights of Way and Access Land). Recreational pursuits can be important in supporting the local economy through tourism, and providing employment including opportunities for apprenticeships and training. Appropriate facilities to enable recreational activities which encourage understanding and enjoyment of, and are compatible with, Exmoor's special qualities and contribute to the local economy and employment are supported⁴⁰⁹.
- 9.73. Policy RT-D10 Recreational Development applies to recreational development and is intended to enable people to enjoy the National Park in a sustainable way consistent with RT-S1 Recreation and Tourism. Proposals should accord with CE-S7 Design & Sustainable Construction Principles, CC-S5 Pollution, CE-S2 Biodiversity, CE-S5 Principles for the Conversion or Structural Alteration of Traditional Buildings, CE-S6 Principles for the Conversion or Structural Alteration of Non-Traditional Buildings, SE-S3 Business Development in the Open Countryside and AC-S1 Sustainable Transport and should also be consistent with the other policies in this plan. Proposals for recreational facilities to serve the needs of the local community will be assessed under HC-S7 Local Commercial Services & Community Facilities.

CONTEXT

- 9.74. Exmoor has proven to be an excellent venue for local, national and international outdoor events including, for example, the Exmoor perambulation, Exmoor Explorer mountain bike ride, Exmoor stagger run, Exmoor Golden Horseshoe endurance riding event, a stage of the National Tour of Britain cycle race and the International 'Ironman' triathlon. Some aspects of recreational activity, such as events that take place on a temporary basis (up to 28 days in a calendar year) do not require planning permission. In many cases, these can be accommodated without harm to the National Park or its users and can play a part in enriching the area. The National Park Authority encourages pre-application discussions to determine whether planning permission is required.
- 9.75. There are also a number of recreational pursuits which do not require physical activity which are appropriate to the National Park such as photography, painting and star gazing⁴¹⁰. The re-use of existing buildings for indoor recreational pursuits may also be suitable in the Exmoor context, for example, to provide recreational facilities during wet weather. Recreation facilities that also provide multiple functions sustainably such as wildlife habitats, carbon storage, food production and flood risk mitigation will be supported where appropriate in a National Park context⁴¹¹ (CE-S3 Green Infrastructure, CE-D2 Green Infrastructure Provision). National policy encourages the identification and promotion of new access and recreational opportunities and ways of delivering them⁴¹².

CONSIDERATIONS FOR PROPOSALS

- 9.76. As the leisure sector is fast-changing with patterns and popularity of uses changing over time, it is not appropriate to specify particular recreational activities within this policy or provide an area based approach. Proposals will be determined on a case-by-case basis using the principles set out in RT-D10 Recreational Development, to enable a flexible approach over the plan period.
- 9.77. The scale, design and intensity of use or activity are important factors in determining whether a proposed development is compatible with the locality, historic environment, environmental capacity, landscape character and visual amenity of the area. The cumulative impact of

⁴⁰⁹ Your Future Exmoor Consultation

⁴¹⁰ Exmoor became an international Dark Sky reserve in 2011, please refer CE-D1 Dark Night Sky

⁴¹¹ Functions include recreation, wildlife, carbon storage, food production and flood risk mitigation. NPPF 2012

⁴¹² English National Parks and the Broads UK Government Vision and Circular (DEFRA, 2010)

existing or proposed development will also be a material consideration in determining planning applications (CE-S7 Design & Sustainable Construction Principles).

- 9.78. The majority of recreational activities and facilities on Exmoor that utilise the outdoor natural resource are small scale and dispersed and these are most likely to be suitable in the Exmoor context. However, some recreational activities, particularly noisy pursuits, can conflict with the National Park's special qualities and enjoyment of them⁴¹³, particularly tranquillity (RT-S1 Recreation & Tourism). Other impacts on the National Park's special qualities such as biodiversity should also be key considerations for proposals. Activities which will conflict with the National Park's special qualities including through visual intrusion, noise and causing erosion are not appropriate in the National Park (also see CC-S5 Pollution). New recreational activities may also conflict with other recreational pursuits in the locality. To minimise impacts, a number of measures, some of which are outside the planning system, can be used such as voluntary codes of conduct, monitoring of illegal motor vehicle activity and use of temporary or permanent Traffic Regulation Orders as appropriate. Although often viewed as a 'green' use of the countryside, golf courses and extensions to existing courses are not considered to be compatible with the National Park's landscape due to the formalisation and standardisation of an area of beautiful and, relatively wild country and diverse biodiversity.
- 9.79. Commercial game shooting in Exmoor has expanded since the 1990s and it brings valuable income to the local economy, particularly through supporting tourism businesses outside of the main season. Activities and associated development such as rearing pens, game crops, feeding equipment can individually and cumulatively adversely impact the National Park and access to and enjoyment of it. Such development and activity should not harm the National Park including its natural beauty, wildlife and habitats, tranquillity, public safety or access rights⁴¹⁴. Issues surrounding signage and safety should also be addressed. The Greater Exmoor Shoots Association (GESA) is the membership organisation for local shoots based in and around Exmoor National Park. They are a lead partner in encouraging the good environmental management of Exmoor game bird shoots and minimising visual impacts⁴¹⁵. Guidance on voluntary codes of conduct is available from Exmoor National Park Authority.
- 9.80. Certain activities relating to the shooting of game may need planning permission. Where birds are reared and shot for sporting purposes for more than 28 days in a calendar year it is likely that planning permission is required even if the activity takes place on existing agricultural land unless the shooting use has become long established in planning terms. The National Park Authority will provide advice on whether planning permission is required. Proposals for commercial game shooting in the Exmoor context must demonstrate they are part of a farm diversification scheme (SE-S4 Agricultural and Forestry Development).
- 9.81. Development should be focussed in or adjoining named settlements (GP4 Spatial Strategy). Special justification for proposals to be located in the open countryside will be required. Where a recreational development is proposed in the open countryside, it should be closely associated with existing recreational development or should be farm diversification (SE-S3 Business Development in the Open Countryside). Occasionally, proposals may be capable of being accommodated in the open countryside away from existing development. In such cases, the development should enhance the understanding or enjoyment of the special qualities of the National Park and applicants will be expected to clearly demonstrate that such a location is essential for the development.
- 9.82. Proposals should, in the first instance, make best use of existing buildings consistent with RT-S1 Recreation and Tourism and the sequential test in clause 2 of GP4. Spatial Strategy. Proposals should also ensure that access arrangements are adequate, that the local road network has the capacity to service the development including during the peak season and that any necessary parking can be accommodated unobtrusively. Travel plans may be required where proposals are likely to result in significant traffic generation. Opportunities for access by sustainable means will be encouraged (AC-S3 Traffic Management and Parking).
- 9.83. Where a building/structure for recreational development becomes redundant the development should be removed and the land should be restored to its former condition to minimise its

⁴¹³ English National Parks and the Broads UK Government Vision and Circular (DEFRA, 2010)

⁴¹⁴ Your Future Exmoor Consultation Events 2010

⁴¹⁵ National Park Partnership Plan 2012

impact on the natural environment and landscape of the National Park. Where appropriate environmental enhancement will be encouraged when the land is restored.

RT-D10 RECREATIONAL DEVELOPMENT

1. **Proposals for recreational development that support a sustainable local economy will be permitted where it can be demonstrated that, individually and cumulatively:**
 - a) **they are consistent with, CE-S5 Principles for the Conversion or Structural Alteration of Traditional Buildings and where appropriate CE-S6 Principles for the Conversion or Structural Alteration of Non-Traditional Buildings. Where the National Park Authority is satisfied that no suitable buildings exist and the need for a new building is clearly demonstrated a new building may be considered where proposals are consistent with other policies in this plan. Siting should be well related to existing buildings;**
 - b) **the location together with scale, and intensity of use or activity (including seasonal impacts) is appropriate in relation to the historic environment, wildlife sensitivity (CE-S2 Biodiversity), environmental capacity, landscape character, visual amenity and existing enjoyment of the area;**
 - c) **it is in or adjoining a named local service centre or village (GP4);**
 - d) **Where they cannot be accommodated in a local service centre or village, the development will enhance the understanding and enjoyment of the special qualities of the National Park, and it can be clearly demonstrated that such a location is essential for development;**
 - e) **There is adequate access, including by sustainable modes of transport, parking can be accommodated unobtrusively and the existing local road network has capacity to service the development (AC-S1); and**
 - f) **The development will be removed and land restored to its former condition when the building/structure becomes redundant unless planning permission is granted for an alternative use. Environmental enhancement will be encouraged when the land is restored.**

EQUESTRIAN DEVELOPMENT

PURPOSE OF POLICY

- 9.84. Owning and riding horses are traditional and popular activities on Exmoor⁴¹⁶ for the community and visitors alike and can provide a valuable contribution to the local economy⁴¹⁷. However, if not carefully managed, the keeping of horses and associated development can detrimentally impact the character and quality of Exmoor's landscape. The welfare of horses can also be an issue.
- 9.85. There is the potential for formalised facilities such as manèges, livery yards and pony trekking centres to lead to negative impacts on the landscape such as the over-use of the surrounding access network which can have an environmental impact and affect other users such as walkers (RT-12 Access Land and Rights of Way). Additionally, equestrian development and the sub-division of fields can affect the landscape character of the National Park⁴¹⁸ (CE-S1 Landscape Character). Consultation demonstrated virtually unanimous support for avoiding adverse impacts on the landscape and other special qualities of the National Park associated with recreational activities including equestrian⁴¹⁹. Policy RT-11 whilst supportive of equestrian activities because they are part of the history and culture of Exmoor, seek to ensure the very best management of horses and pasture in the context of the National Park.

⁴¹⁶ Exmoor Landscape character assessment (2007) states various criteria of what key characteristics are found in the landscape of Exmoor. Horse grazing is referred to several times.

⁴¹⁷ Visitor survey, Youth consultation

⁴¹⁸ Stakeholder events 08/09

⁴¹⁹ Stakeholder events 08/09

NATIONAL CONTEXT

- 9.86. National policy supports a strong rural economy. This includes businesses and enterprises in rural areas that are a diversification of agricultural and other land-based rural businesses which respect the character of the countryside⁴²⁰. Horse riding and other equestrian activities can fit in well with farming activities to help diversify rural economies⁴²¹.

CONTEXT

- 9.87. Horse riding, keeping and horse related development can be compatible with National Park purposes. Managed well, any visual intrusion or other potential impacts from associated buildings, enclosures, fences, increased traffic, light and noise pollution can be minimised to an acceptable level in the environment.
- 9.88. Landscape and wildlife impacts resulting from overgrazing can be minimised by ensuring there is an appropriate amount of land available for horse grazing. The British Horse Society recommends as a general guideline a ratio of two horses per hectare on permanent grazing (1-1.5 acres per horse)⁴²² this would be considered a minimum in the National Park because of the nature of the land⁴²³. The type of field boundary and sub-division of fields can also affect landscape character. Sub-dividing fields with a variety of materials such as electric tape fencing often gives an impression of clutter, fragmentation and over intensive use of the land. When keeping horses in areas accessible to the public, horse keepers should ensure they do not detrimentally impact the access network or cause risk to the public including as a result of the sub-division of fields. Impacts can be managed by following best practice advice for example:
- a) Local or traditional approaches should be used e.g. hedgebanks and native hedging (hedge laying is a traditional management technique and can positively contribute to local wildlife, biodiversity and support a traditional local craft)
 - b) Avoid or minimise sub-division of fields where possible. If sub-division is necessary mirror the lines of existing field boundaries and use low visibility/mute coloured materials.
- 9.89. Hedgerow regulations (1997)⁴²⁴ prevent the removal of all or part of hedgerows without first submitting a hedgerow removal notice to the National Park Authority. Horse owners also have a 'duty of care' to ensure horse waste is stored and disposed of responsibly to protect amenity and avoid ground and water pollution (CC-S5 Pollution).

CONSIDERATIONS FOR PROPOSALS

- 9.90. In some cases planning permission may not be required e.g. the grazing of horses on agricultural land is regarded as agricultural use. However in certain circumstances, planning permission will be needed for the change of use of land e.g. the sub-division of agricultural land into paddocks and shelters for horses is likely to be regarded as a change of use to recreational land. Usually, if the grazing is part of an activity such as a livery, it will require planning permission for change of use of the land.
- 9.91. The policy applies to horse related development including stabling/loose-boxes, manèges/exercise areas, livery yards, hay barns, feed stores, tack rooms, new gateways, tracks or access points onto highways, permanent jumps, lighting and any consequent engineering work such as earth moving. As it is the landowners or land managers responsibility to ascertain whether planning permission is required for any development, the NPA encourages discussions at an early stage to determine whether planning permission is needed and will provide advice if a formal application is required. Horse owners are advised to check whether the land they use for any equestrian activity has planning permission.
- 9.92. To minimise the effects on the National Park, horse related development where horses are to be kept should always be close to the property it is intended to serve. Where horses are to be 'kept' refers to the location where horses are to remain for the majority of the time; this may

⁴²⁰ NPPF 2012

⁴²¹ However there is some concern over the loss of agricultural land to equestrian use on Exmoor (SE-S4 Agricultural and Forestry Development).

⁴²² South West England. SWPLF Equestrian Guide. (2010)

⁴²³ Kent Downs AONB recommend 2.5 acres per 500kg horse for resting and rotation

⁴²⁴ Hedgerow Regulations (1997) <http://www.legislation.gov.uk/ukxi/1997/1160/contents/made>

include structures/buildings used as shelter for horses. Existing buildings should be reused in the first instance, where they are available and appropriate for the type of equestrian development proposed – consistent with policies CE-S5 Principles for the Conversion or Structural Alteration of Traditional Buildings and CE-S6 Principles for the Conversion or Structural Alteration of Non-Traditional Buildings. New development will not be appropriate where it is not well related to existing buildings. Where new buildings are required, they should achieve a high standard of design (SE-S4 Agricultural and Forestry Development; CE-S7 Design & Sustainable Construction Principles). Consideration will need to be given to the siting, scale, design, materials, colour and landscaping of new development. External lighting can, in particular, lead to a site appearing prominent in the landscape and adversely affect the tranquillity of the National Park. Where artificial lighting is proposed, this should be consistent with CE-D1 Protecting Exmoor's Dark Night Sky and CC-S5 Pollution. Proposals must also demonstrate they do not cause harm to the natural environment and the access network, and are compatible with other policies in this plan.

- 9.93. Conditions will be used where appropriate and may include that:
- a) the development is limited to domestic use where the proposal is intended for this purpose;
 - b) the development should not cause harm to equestrian routes, this can include through limiting the number of horses;
 - c) the removal of the building/structure and restoration of the land to its former condition should the use cease to be operational unless planning permission is granted for an alternative use.
- 9.94. Some equestrian development can be incongruous in the landscape and its proliferation could therefore have an adverse impact on visual amenity and the landscape of the National Park. The cumulative impacts of equestrian development will be a material consideration in determining planning applications. In some cases a temporary consent may be considered in order to ascertain whether equestrian development will be acceptable in the longer term.
- 9.95. All proposals for equestrian development will be required to submit a land management plan as part of their planning application. The following factors, based on good practice guidance prepared by the National Park Authority, should be considered when compiling a land management plan for equestrian development including:
- a) Managing grazing
 - b) Managing waste
 - c) Means of enclosure and boundary treatments
 - d) Tree and hedge protection/management
 - e) Buildings and Structures
 - f) Impacts on Public Rights of Way
 - g) Soil structure
 - h) Managing invasive species e.g. ragwort
- 9.96. The land management plan should be relative to the scale of the proposed development and the activity likely to be generated; larger-scale equestrian development including pony trekking and livery yards will therefore be required to provide detailed land management plans to fully explain how the factors listed above will be addressed.
- 9.97. The policy would, in principle, provide for proposals for stabling at visitor accommodation businesses, such as hotels, where they would support equine tourism, provide short-term shelter for horses, comply with Policy RT-D11 below and other policies within this plan.

RT-D11 EQUESTRIAN DEVELOPMENT

- 1. Proposals for equestrian development will be permitted where it can be demonstrated that individually and cumulatively they:**
 - a) are consistent with RT-S1 Recreation & Tourism, CE-S1 Landscape Character;**
 - b) do not adversely affect the natural environment or amenity of the surrounding area or neighbouring properties either directly or indirectly including through pollution and visual intrusion (CC-S5; CE-D1);**
 - c) re-use existing buildings consistent with Policy CE-S5 Principles for the Conversion of Structural Alteration of Traditional Buildings or, where appropriate, CE-S6 Principles for the Conversion or Structural Alteration of Non-Traditional Buildings. Where the National Park Authority is satisfied that no suitable buildings exist and the need for a new building is clearly demonstrated, a new building may be considered where proposals are consistent with other policies in this plan. Siting should be well related to existing buildings;**
 - d) do not cause unacceptable levels of traffic in terms of the environmental or physical capacity of the road network, and do not prejudice road safety interests (AC-D1);**
 - e) are appropriate to the landscape setting and the environmental capacity of the area in terms of the intensity of use or activity;**
 - f) are sited sensitively in terms of visual impact and, of an appropriate scale, well designed and, unobtrusive in their form, in terms of their height, position and materials including by means of enclosure. Proposals should reflect the character and form of existing traditional development (CE-S7);**
 - g) have adequate and suitable grazing land to support the development proposed;**
 - h) do not generate the need for a separate dwelling that cannot be met by an existing dwelling or through the conversion of a traditional building (HC-D4, HC-D12);**
 - i) are well related to suitable networks of equestrian routes which are capable of supporting the additional usage in accordance with RT-12 Access Land and Rights of Way; where appropriate, horses will be regulated to a number which will not cause harm to equestrian routes, the landscape or nature conservation; and**
 - j) ensure the site is managed in accordance with a land management plan agreed by the National Park Authority.**
- 2. In the case of development proposals that involve the keeping of horses, the development shall be sited close to the dwelling it is intended to serve.**

ACCESS LAND AND RIGHTS OF WAY

PURPOSE OF POLICY

9.98. Walking is a popular recreational activity on Exmoor, often being cited as the main reason for visiting the National Park⁴²⁵. Cycling and horse-riding have also become popular activities on Exmoor. Such interests utilise the extensive access network, which in the context of the policy includes Public Rights of Way (PRoW),⁴²⁶ access land⁴²⁷, statutory and permitted cycle routes, permissive paths and roads used for these purposes. By providing the medium for such activities the access network plays an integral role in promoting the enjoyment of the National Park for the public, for both visitors and local communities alike, and in doing so helps to achieve the second statutory purpose of the National Park. As the access network has an important influence on the number of visitors to Exmoor, it makes a valuable contribution to the local economy of the area including for a significant number of local businesses. Furthermore the access network is important to the biodiversity of the National Park, providing valuable habitats, environments and linkages for both plant and wildlife. It can also be an important element of the historic environment and is a valuable feature of the landscape character of Exmoor (CE-S1 Biodiversity, CE-S4 Cultural Heritage and Historic Environment, CE-S1 Landscape Character). Policy RT-D12 seeks to safeguard Exmoor's valuable access network.

NATIONAL CONTEXT

9.99. The access network currently provides a means of sustainable transport and enables popular recreational activities that promote healthier living which is advocated by National Policy. National policy also states that planning policies should protect and enhance public rights of way and access and local authorities are encouraged to seek opportunities to provide better facilities for users such as by linking existing rights of way networks⁴²⁸.

CONTEXT

9.100. A high standard of maintenance, clear way-marking and the minimisation of any conflicts between path users and landowners are vital to the enjoyment of the access network. The legal responsibility for the maintenance of PRoW lies with Devon and Somerset County Councils, delegated to Exmoor National Park Authority for many years. Exmoor National Park Authority liaises with farmers and land managers to address any issues arising from PRoW across their land. Definitive map amendments are undertaken by the relevant Surveying Authority. A large proportion of the network is available to pedestrians, cyclists and also equestrian users, which reflects the historic and current importance of horse riding on Exmoor. Users' interests encompass the physical use and the understanding, enjoyment and experience of the access network including views and tranquillity. Opportunities to enhance the access network to improve the inclusiveness and enjoyment of the network to all users of all abilities will be sought.

9.101. Climate change may result in an increased need for maintenance of the access network. The Exmoor National Park Partnership Plan includes a priority and objective to ensure the maintenance and improvement of the rights of way network as a special quality of the National Park⁴²⁹. The Rights of Way Improvement Plan 2005 (RoWIP) for Devon and Somerset also include objectives and priorities for improving the PRoW network for the benefit of all users on Exmoor.

CONSIDERATIONS FOR PROPOSALS

9.102. Policy RT-D12 seeks to ensure that the existing access network, including PRoW and access land, is not adversely affected by development proposals. In recognition of their important role

⁴²⁵ Exmoor Rights of Way Improvement Plan (2005); Exmoor National Park Authority Visitor Survey (2010)

⁴²⁶ Public Rights of Way

⁴²⁷ Countryside and Rights of Way (CRoW) Act 2000

⁴²⁸ NPPF 2012

⁴²⁹ Priority B2: Maintaining high quality rights of way, services and facilities to enhance enjoyment and understanding of the National Park
Objective 9: To maintain and improve the recreational opportunities in the National Park particularly the rights of way network, access to open country, other quiet and active recreation based on Exmoor's special qualities; and ensure that opportunities for recreation can be enjoyed by people from all backgrounds and of all abilities

in achieving the second purpose of the National Park, sustainable transport infrastructure, economic benefits and achievement of government's objectives including health and well-being, the authority will afford them protection from development that is likely to prejudice their current or future use. Proposals that enhance the network and improve existing routes including the provision of linkages between routes will be encouraged (RT-S1 Recreation & Tourism; AC-S1 Sustainable Transport; CE-S3 Green Infrastructure; CE-D2 Green Infrastructure Provision).

- 9.103. Where proposals are likely to result in an increase in the intensity of vehicular use on shared access routes, applicants will need to demonstrate that the safety, ease of use and enjoyment (including the condition) of the access network by all users will be maintained.

RT-D12 ACCESS LAND AND RIGHTS OF WAY

- 1. The access network will be safeguarded by ensuring that development proposals will not adversely affect:**
 - a) the condition of the access network;**
 - b) users' interests;**
 - c) character and appearance; and**
 - d) biodiversity or historic environment.**
- 2. Where proposals will adversely affect the access network applicants will be required to demonstrate that:**
 - a) the need for and benefit of the development clearly outweighs any harm to the current access network;**
 - b) there is no appropriate alternative location;**
 - c) any harm will be kept to a minimum;**
 - d) the affected network will be improved and enhanced to protect users' interests;**
 - e) opportunities have been sought to provide linkages between routes, and strengthen the green infrastructure network (CE-S3, CE-D2); and**
 - f) an acceptable diversion and/or compensatory land of equal or better quality are provided where necessary.**

SAFEGUARDING LAND ALONG FORMER RAILWAYS AND REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY

PURPOSE OF POLICY

- 9.104. Former railways are important historic assets which form a valuable component of the cultural heritage of Exmoor National Park. They can also be re-used as part of the access network e.g. as walking or cycling routes, are important wildlife corridors/links between habitats for species such as dormice and bats, become a part of the green infrastructure network or may be reinstated as part of the transport network (RT-D12 Access Land and Rights of Way; CE-S3 Green Infrastructure and CE-D2 Green Infrastructure Provision; AC-S1 Sustainable Transport). RT-D13 Safeguarding Land along Former Railways seeks to safeguard this important historic asset.
- 9.105. As it is probable that a proposal for the reinstatement of the Lynton and Barnstaple Railway will be received during the Plan period, Policy RT-S2 Reinstatement of the Lynton and Barnstaple Railway sets out criteria for assessing any such proposal to ensure any associated development does not harm the experience or enjoyment of the National Park, or its special qualities including tranquillity. Where a proposal is classified as major development it must accord with GP3 Major Development.

CONTEXT

Former Railways on Exmoor

West Somerset Mineral Line

- 9.106. The 11.5 mile West Somerset Mineral Railway was constructed to carry iron ore from mines in the Brendon Hills to Watchet harbour for shipment to Newport in South Wales. The Mineral Railway opened as far as Roadwater in 1857 and works had begun on the half mile long incline which carried the line to the summit of the Brendon Hills. The incline, completed in 1868, was twin track gravity operated and with a gradient of 1 in 4, it was perhaps the most significant standard gauge incline in the country.
- 9.107. By 1880 the upper section of the line was falling into dereliction and in 1883, when the mines closed and ore trains no longer ran, revenue from passenger and goods traffic was not enough to cover the cost of running services and maintaining the line, which closed in 1898.
- 9.108. In the early 1990s Exmoor National Park Authority purchased the trackbed of the railway's incline. It was scheduled as an Ancient Monument and a grant was secured from the Heritage Lottery Fund for the conservation of the harbour at Watchet outside the National Park, as well as the railway and mine sites both within and outside the National Park⁴³⁰.

Lynton and Barnstaple Railway

- 9.109. The construction of the 19 mile long Lynton and Barnstaple railway began in 1895 and opened in 1898. Referred to as the 'The Toy Railway', as the height of the coaches was only 8 ft 7 inches, it was built as a narrow gauge to lower the cost of construction and to follow the natural contours of the countryside. The track, rolling stock and buildings were built to a high standard and in 1923 the Lynton and Barnstaple Railway was purchased by Southern Railway who commenced a major investment program including the relaying and re-fencing of the track. However, in the face of increasing competition from road transport, the line closed in 1935 and the rolling stock and track were sold. The remainder of the track was lifted the following year. Most of the buildings and some of the bridges survived. The former railway line lies partly within Exmoor National Park and part outside the National Park in North Devon District.
- 9.110. In 1979 a group was formed to restore the railway which in 1998 became the Lynton and Barnstaple Railway Trust and in 2004 opened a one mile stretch of the original track from Woody Bay to Killington Lane to the public⁴³¹. The Trust has an aspiration to extend the line

⁴³⁰ Jones, M.H. (2011) The Brendon Hills Iron Mines and the West Somerset Mineral Line: A New Account.

⁴³¹ Lynton and Barnstaple Railway <http://www.lynton-rail.co.uk/railway>

beyond the former railway station in Lynton to terminate at a new station closer to the settlement. The draft Lynton and Lynmouth Neighbourhood Plan (ES-S2) proposes a policy regarding the reinstatement of the Lynton & Barnstaple Railway, including the provision of a new Lynton station and an effective link for passengers from the station to the centre of Lynton.

SAFEGUARDING LAND ALONG FORMER RAILWAYS

- 9.111. Policy RT-D13 seeks to safeguard land along the line of the West Somerset Mineral Line and the Lynton and Barnstaple Railway as linear continuous routes for their recreation and historic value, and their potential for sustainable modes of travel within Exmoor National Park. Land to be safeguarded is identified on the Plan Policies Map. It excludes land within the footprint of residential dwellings in existence when the Plan was adopted. Partial deviation from the original route will only be considered to achieve a linear continuous route when this cannot be reasonably achieved on the original route. Proposals for a deviation of the route should follow the character of the original route. Where a proposal for partial deviation of the safeguarded route is permitted and developed the agreed alternative route will be safeguarded as a replacement of the original route it substitutes. The National Park Authority will work with neighbouring authorities to ensure a consistent approach where lines cross administrative boundaries.
- 9.112. The safeguarding of former railways does not imply the acceptance of the principle for a reinstated railway scheme. Any proposals which may come forward will be assessed on their own merits and will be subject to rigorous examination consistent with National Park purposes, Plan policies and design principles.

REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY

- 9.113. The former Lynton and Barnstaple Railway is an important heritage asset contributing to the cultural heritage of Exmoor National Park. Any proposal for reinstatement should therefore seek to replicate the original historic former railway and further National Park purposes; this includes following the original line, reusing original buildings and replicating the siting, floor space, design, materials and appearance of the former railway and its associated structures/buildings. Any reinstatement of the line would need to consider implications of flood risk and accord with CC-S1 Climate Change Mitigation and Adaptation and CC-D1 Flood Risk.
- 9.114. The former Lynton and Barnstaple Railway runs through open country within the National Park. Consequently, any additional new development from the original historic former railway including diversions from the original route and any new buildings will only be considered where it can be demonstrated, and the National Park Authority is satisfied that, no alternative solutions would meet the need for the development in any other way, and it is essential for the operation of the reinstated former railway or is a restoration of a historic feature and respects the character of the former railway.
- 9.115. To help protect the National Park landscape and its setting, the National Park Authority and Local Authorities will work together to agree a coordinated approach which favours the re-use of the original buildings associated with the former railway both within and outside the National Park. This principle ensures that any reinstatement is historically accurate and avoids or minimises new buildings in line with National Park principles. Where it can be demonstrated this is not possible, existing buildings in suitable proximity to the reinstatement may be considered (CE-S5 and CE-S6 Principles for the Conversion or Structural Alteration of Buildings). New buildings will only be considered where it has been clearly demonstrated that there are no suitable existing buildings that can be re-used and that there are no alternative solutions which would meet the need for the building in any other way. The National Planning Policy Framework states that new isolated homes in the countryside should be avoided⁴³² and the National Parks Circular states that the expectation is that new housing will be focused on affordable housing, supporting local employment opportunities and key services⁴³³. Proposals should also accord with policies in section 7 Achieving a Thriving Community of this plan and thus should not generate the need for a new separate dwelling.

⁴³² NPPF 2012, para 55

⁴³³ English National Parks and the Broads: UK Government Vision and Circular (2010)

- 9.116. The design of all aspects of a proposal should reflect the traditional character and appearance of the original railway and ensure that the proposed development is integrated in its setting, this includes proposals for infrastructure, buildings or similar structures. The conversion or alteration of existing buildings should accord with CE-S5 and CE-S6 Principles for the Conversion or Structural Alteration of Buildings. All proposals, including for new build, should replicate and reflect the original scale, floor space, layout, form, architecture, design, appearance, detailing, materials and boundary treatments of the former railway. Detailed documentary evidence should be provided with any application to demonstrate how a proposal has reflected the former railway including for proposals for deviations from the original historic former railway to ensure the new development reflects the character of the former railway. Landscaping should be incorporated as part of the proposal to conserve and enhance the National Park. This should have regard to the site and character of the area and also the traditional features of the former railway. Landscaping may include trees, hedges, walls, railings, fences and surface treatments (CE-S7 Design & Sustainable Construction Principles).
- 9.117. Proposals should take into account potential wildlife issues, this includes the impact on protected species both along the proposed route and associated buildings and should accord with CE-S2 Biodiversity.
- 9.118. Any potential pollution from a proposed development will need to be considered. It should be avoided where possible and in all cases the development should not cause any unacceptable adverse impacts to the National Park, including to air, soil, water, or as a result of light and noise pollution (CC-S5 Pollution).
- 9.119. Waste and resource use should be minimised through the reuse of buildings, materials and site waste. Sustainable construction methods are encouraged in the National Park however in the case of the reinstatement of a former railway, the priority will be the historical accuracy of the development. Sustainable construction methods should therefore be used, unless it compromises the historical accuracy and appearance of the reinstated former railway (CE-S7 Design & Sustainable Construction Principles).
- 9.120. The National Park Authority will work with Somerset and Devon County Councils as the Highways and Transport Authorities and transport providers to encourage sustainable transport for residents and visitors (AC-S1 Sustainable Transport). Any proposed development will need to ensure appropriate and safe access to the road network and should not cause unacceptable levels of traffic in terms of the physical capacity of the network including road safety interests and the environmental impacts of accommodating such requirements (AC-D1 Transport and accessibility requirements for development). The National Park Authority will expect any proposal to incorporate measures to enable safe access by transport other than the private car such as walking, cycling or public transport to minimise traffic generation and the need for parking. A travel plan will therefore be required to ensure the proposal delivers sustainable travel outcomes. Where necessary, a transport assessment, transport statement and air quality assessment may be required (RT-S1 Recreation & Tourism; Section 10 Achieving Accessibility for All). Proposals should also accord with RT-D12 Access Land and Rights of Way, CE-S3 Green Infrastructure and CE-D2 Green Infrastructure Provision.
- 9.121. Applicants will be expected to demonstrate to the National Park Authority's satisfaction that any highway infrastructure proposed as part of the development is essential to the proposal and that it will not lead to unacceptable impacts to road users or result in the severance of existing highway routes. In such cases, to ensure potential impacts would be acceptable in a National Park context, the proposed infrastructure (including crossings) should be of an appropriate scale and design, such as through the use of natural and traditional materials, to ensure that it will conserve and enhance the National Park (AC-S2 Transport Infrastructure).
- 9.122. There is a presumption against providing for permanent peak parking demand due to the impact on the natural and built environment in the National Park. Instead, there is a need to seek more sustainable solutions to the management of traffic and the demand for parking. The scale of car parking provision should therefore be minimised and be appropriate to the average daily usage annually and both the scale and design should be appropriate to the context of the National Park designation as well as the landscape character and setting of the site and area (AC-D2 Parking Provision and Standards). To address higher levels of parking which may arise for limited periods during peak season, temporary overflow measures may be permitted to accommodate peak parking demand where current parking arrangements are

causing environmental harm to the local area, the National Park, and/or is adversely affecting the quality of life of local communities and are in accordance with AC-D3 Temporary Parking.

- 9.123. Former railways are important historic assets which are valuable to the cultural heritage of the National Park. They can also be re-used as part of the access network therefore if the use of the reinstated railway line becomes redundant, the rail line (including alternative routes permitted) will be safeguarded for its recreational and historic value to help further National Park purposes. To ensure the line is retained as a linear access route a legal agreement will be sought as part of a planning permission (RT-D13 Safeguarding Land along Former Railways).

RT-D13 SAFEGUARDING LAND ALONG FORMER RAILWAYS

- 1. The land on the route of the former the Lynton and Barnstaple Railway and the West Somerset Mineral Line as shown on the Plan Policy Map will be safeguarded as important historic assets valuable to the cultural heritage of the National Park and protected from development that would prevent its reuse for expansion of the access network and/or the reinstatement of the former railway (RT-S2 Reinstatement of Lynton and Barnstaple Railway).**
- 2. Where proposals will enable the expansion of the access network and/or the reinstatement of the former railway partial deviation from the original railway route will only be considered where it can be demonstrated that a linear continuous route cannot be reasonably achieved by using the original route. Where a partial deviation of the original route is permitted and developed, the agreed alternative route will be safeguarded as a replacement of the original route it substitutes.**
- 3. Safeguarding of these routes does not imply the acceptance of the principle of any reinstated railway.**

RT-S2 REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY

1. Proposals for the reinstatement of the Lynton and Barnstaple Railway should be in accordance with other policies in this Plan and the following criteria:
 - a) The proposal should seek to reinstate and replicate the former narrow gauge railway including the line of the original route and the siting, design, appearance, floor space and materials of the associated structures/buildings. Any additional new development over and above the original historic former railway should provide demonstrable evidence that it is essential for the operation of the reinstated former railway or is a restoration of a historic feature and that there are no alternative solutions which would reasonably meet the need for the development in any other way;
 - b) Reinstatement proposals should:
 - i) Seek to re-use the original buildings associated with the former railway both within and outside the National Park.
 - ii) Where it can be demonstrated that the re-use of the original buildings cannot be achieved, existing buildings in suitable proximity to the reinstatement proposal may be considered.
 - iii) New buildings will only be considered where the National Park Authority is satisfied that it has been demonstrated that there are no existing buildings suitable for re-use.
 - c) The proposal should not generate the need for a separate new build dwelling and any dwelling proposals should accord with HC-S1 Housing, HC-D2 New Build Dwellings in Settlements, HC-D5 New Build Dwellings in the Open Countryside and CE-S5 Principles for the Conversion or Structural Alteration of Traditional Buildings;
 - d) Infrastructure, buildings and similar structures should reflect the traditional character of the original railway including through design, materials, scale, layout, form, architecture, appearance, detailing and boundary treatments;
 - e) Detailed documentary evidence to demonstrate how the proposal has reflected and replicated the original character of the former railway should be submitted with the application;
 - f) The proposal should be integrated in its setting in accordance with CE-S7 Design & Sustainable Construction Principles. Landscaping appropriate to the site and character of the area and having regard to traditional features of the former railway should be incorporated as part of the proposal;
 - g) Sustainable construction methods should be used, unless they compromise the historical accuracy and appearance of the former railway (CE-S7);
 - h) The proposal should accord with AC-D1 Transport and accessibility requirements for development and provide a travel plan (AC-S1 Sustainable Transport; RT-S1 Recreation & Tourism). The proposal should incorporate measures to enable safe access by walking, cycling and public transport and to minimise traffic generation and the need for parking. The proposal should also accord with RT-D12 Access Land and Rights of Way, CE-S3 Green Infrastructure and CE-D2 Green Infrastructure Provision;
 - i) Any proposed highway infrastructure will only be considered where it can be demonstrated that it is essential to the proposal and will not lead to unacceptable impacts to road users or lead to the severance of existing highway routes. Infrastructure, including crossings, should be of an appropriate scale and design (including through the use of natural and traditional materials);
 - j) Parking provision should be minimised and of a scale commensurate with the average daily usage annually and designed to ensure that it is integrated with the surrounding landscape character and setting. Provision of permanent parking to meet peak parking demand will not be permitted (AC-D2; AC-D3); and
 - k) If the use of the re-instated railway becomes redundant the rail line will be safeguarded as an important linear access route, for its recreational and historic value. A legal agreement will be sought to ensure the line is retained as a continuous linear access route (RT-D13).

10 ACHIEVING ACCESSIBILITY FOR ALL

SUSTAINABLE TRANSPORT

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

Objective 18. *To support sustainable transport for residents and visitors by improving public and community transport services and opportunities for walking, cycling and horse riding including linkages across the National Park boundary.*

Objective 19. *To minimise the net emissions of carbon dioxide and other greenhouse gases into the atmosphere, and support measures which contribute to carbon neutrality in ways that both conserve and enhance the National Park.*

PURPOSE OF THE POLICIES

10.1. These policies set out how the National Park Authority will work with Somerset and Devon County Councils as the Highways and Transport Authorities and transport providers to encourage sustainable transport for residents and visitors, supporting public and community transport services, accessibility, opportunities for walking, cycling and horse riding, and minimising emissions of greenhouse gas emissions. They set out the approach to transport infrastructure, transport and accessibility requirements for new development, traffic management and parking provision.

NATIONAL POLICY CONTEXT

- 10.2. National policy⁴³⁴ states that transport policies have an important role in facilitating sustainable development and contributing to wider sustainability and health objectives. Transport should be balanced in favour of sustainable transport modes, particularly those that minimise greenhouse gas emissions and reduce congestions, however it is recognised that different policies and measures will be required in different communities and will vary in rural areas. New development should take account of sustainable transport modes in their location and design, facilitated through a Travel Plan.
- 10.3. Cross boundary working with neighbouring authorities and transport providers is advocated to develop strategies for the provision of viable transport infrastructure to support future development. Development that generates significant amounts of movement should be supported by a Transport Statement or Transport Assessment, and are located where the need to travel is minimised taking into account policies set out in National Policy for rural areas, particularly conserving the landscape and scenic beauty in National Parks.
- 10.4. Guidance is also set out in relation to the setting of local parking standards for both residential and non-residential types of development.
- 10.5. The National Parks Circular promotes sustainable low carbon transport and travel in its vision for National Parks that helps to reduce greenhouse gas emissions. It also encourages close working between National Park Authorities and Transport Authorities in promoting more sustainable travel choices. The circular reinforces the strong presumption against any significant road widening or building of new roads through a National Park unless there are compelling reasons where benefits significantly outweigh the costs.

CONTEXT

10.6. The rural nature of much of the National Park, and its dispersed population, means that the majority of people rely on the private car to access jobs, services and facilities. The settlement strategy set out in GP4 Spatial Strategy recognises that new development should be focused in the named settlements to help maintain the future sustainability, self-sufficiency and resilience of these settlements, and should not lead to a severe increase in traffic. Accessibility to essential services can be difficult for those who do not have access to a private car, or regular public transport services. The National Park Authority will encourage Transport

⁴³⁴ National Planning Policy Framework March 2012 (DCLG)

Authorities and transport providers to support the ongoing provision of public transport services, and to encourage demand-responsive community transport initiatives, particularly in those areas where regular public transport services are not available. Similarly, car-sharing clubs are another means of improving accessibility in a rural area, and can also be helpful in reducing the need for second cars in a household and therefore the burden of related costs.

- 10.7. As well as encouraging more sustainable modes of transport for the resident population and those who work in the National Park, the National Park Authority will also encourage visitors and tourists to use non-car modes of travel to the National Park, and to get around once here. The majority of visitors travel to Exmoor by car, and monitoring shows that during the summer months visitor traffic has a substantial impact on traffic levels within the National Park. As a consequence there is some congestion experienced during these peak periods. Exmoor has an excellent rights of way and access network, which provides opportunities for visitors to enjoy the National Park through walking, cycling, and horse-riding (see Section 9 Achieving Enjoyment for All). In particular, encouragement will be given to alternative modes of travel such as public and demand responsive transport, walking, cycling, and horse-riding, and by improving information provision to make it easier for visitors to travel without their car and generally help to improve air quality. Opportunities for enhancement through green infrastructure will also be encouraged in accordance with policy CE-D2 (Green Infrastructure Provision).
- 10.8. Transport is a significant contributor to greenhouse gas emissions (see Section 6 Responding to Climate Change) and consequently the policies in this Plan seek to reduce emissions where possible and support low carbon transport options such as electric vehicles and bicycles. These are becoming more widespread, and the National Park Authority will encourage the appropriate provision of electric charging points in new developments and at suitable locations across the National Park. Where possible and appropriate, these electric charging points should be powered by renewable energy sources, in accordance with CC-S1 and CC-S3. There are also concerns over the future availability and cost of fuel, the policies set out below to encourage alternatives to the car or greater car sharing, will therefore not only help mitigate climate change emissions, but also potentially help secure more affordable means of transport in the National Park.
- 10.9. Information Communication Technology (ICT) is likely to have an increasingly important role in reducing the need to travel and supporting a low carbon future. Although not everyone will choose to use technology in the place of travel, more people are able to work from home, shop via the internet, or access information and services, particularly when they have access to faster broadband connections (further information on the approach to ICT is given in AC-S1 Electricity and Communications Networks).

AC-S1 SUSTAINABLE TRANSPORT

- 1. The National Park Authority will encourage sustainable modes of transport through working with Highways and Transport Authorities, transport providers, local communities, and where appropriate, neighbouring authorities to:**
 - a) Support public transport provision, community based demand-responsive transport and car sharing**
 - b) Encourage provision for walking, cycling and horse-riding including cross-boundary linkages with neighbouring authorities (RT-D12)**
 - c) Support low carbon travel**
 - d) Improve information provision to make it easier for residents and visitors to travel without a car.**

TRANSPORT INFRASTRUCTURE

CONTEXT

10.10. Although road maintenance and improvement schemes within existing highway boundaries do not require planning permission, consultation arrangements exist with the Highway Authorities to enable the National Park Authority's views to be heard before schemes are implemented. Many of Exmoor's roads, bridges and fords are historic and attractive features in their own right. Hedgebanks and hedges, trees, fingerposts, traditional bus shelters and other roadside features also add to the character of Exmoor's road network. Highway maintenance or improvement works can result in the loss of character or cause damage to ecological or historic features.

TRANSPORT INFRASTRUCTURE CONSIDERATIONS

- 10.11. The National Park Authority will encourage Highway Authorities to ensure that any maintenance or improvement works are carried out to the highest environmental standards and in keeping with local character. This includes minimising disturbance to local communities or wildlife, avoiding pollution of watercourses, loss of wildlife interest, impacts on local amenity or visual impacts, and supporting environmental enhancements where possible. Any potential impacts on the access network should be dealt with in accordance with RT-D12 (Access Land and Rights of Way).
- 10.12. In addition climate change adaptation measures will be required, particularly in response to more extreme weather events. Surface water is already having an impact on the lifespan of road surfaces. The National Park Authority will work with Highways Authorities and partners to identify the areas of the transport network that are at greatest risk from the impact of climate change (including coastal change) and support measures that enhance its resilience. The choice of materials should maximise sustainable drainage (SUDS) and reduce run-off.
- 10.13. The National Park Authority will work with Highways Authorities, local communities and businesses to ensure that highway safety is not compromised, and avoid unnecessary highway signage and other forms of highway structures, which would have an adverse impact on the landscape and street scene. Certain visitor attractions are eligible for advance signing using the Highway Agency's 'white on brown' tourism signs, which are paid for by the individual operator and are authorised by the Highway Authority. However Exmoor National Park Authority should be consulted on individual proposals in the National Park. Signs, road markings, barriers and traffic signals should be kept to a minimum and—comprehensive approaches to local signing and advertisement will be promoted where benefits to local character, amenity and highway safety can be achieved (refer to CE-D4 for further information on advertisements).
- 10.14. Upgrading of existing routes designed to accommodate higher traffic speeds would be resisted by the National Park Authority as inconsistent with the National Park purposes. Proposals for new roads will only be considered where they are required for access to new development or enable substantial environmental gain. Any new access roads would need to be proportionate to the scale of development and designed to the highest standards that are appropriate to the character of the local landscape and built environment.

AC-S2 TRANSPORT INFRASTRUCTURE

1. Exmoor National Park Authority will work with Highways Authorities and local communities to ensure that works to highways and transport infrastructure including traditional fords and bridges, road maintenance and improvement schemes, parking provision or new access roads, signage and street furniture reflect local character and:
 - a) Are designed and constructed to conserve and enhance the natural beauty of the National Park, using materials and finishes that are appropriate to the character of the local landscape and built environment (CE-S1 Landscape Character, CE-S4 Cultural Heritage, and CE-S7 Design & Sustainable Construction Principles).
 - b) Maintain and, where possible, enhance the rural character of roads.
 - c) Retain (or if this is not possible, replace like for like) existing traditional street furniture and highways signage such as fingerposts, milestones, cast iron signs or other features important to the character of the area.
 - d) Maintain and protect biodiversity (CE-S2).
 - e) Incorporate wildlife enhancements and landscaping schemes where appropriate.
 - f) Maintain and enhance existing rights of way in accordance with RT-S1 (Recreation and Tourism) and RT-D12 (Access Land and Rights of Way).
 - g) Minimise disturbance and damage during maintenance or construction.
 - h) Minimise lighting (CC-D1), highways signage and reduce clutter.
 - i) Take account of road safety interests particularly for non-motorised modes of transport, and the capacity and function of the road network.
 - j) Support measures to increase future resilience of transport infrastructure at risk from climate change and extreme weather events.
2. New roads are not considered to be appropriate in the National Park context, except where they are required for access to new development or would result in substantial environmental gain.

TRANSPORT AND ACCESSIBILITY REQUIREMENTS FOR DEVELOPMENT**CONTEXT**

- 10.15. Applications should be located, designed and planned to avoid community severance and encourage a shift of priority towards pedestrians, cyclists, horse riders and public transport. They should seek to create environments that are attractive and that encourage travel by modes other than the car to jobs, services and the wider transport network. Opportunities to support low carbon travel, such as installation of electric charging points, will be encouraged, where these are in keeping with local character. Car share clubs will also be supported, particularly where this helps to reduce isolation for those who do not have access to a private car.
- 10.16. Development, including the change of use of buildings can lead to a requirement for road improvements and further maintenance. Conserving and enhancing the National Park and its special qualities and the safety of non-car users will be the primary criteria in the planning and design of transport and its management. Standard highway solutions are sometimes used as a development design starting point which can have the effect of discouraging the exploration of good design and local distinctiveness, which are particularly important attributes for development in Exmoor National Park. Solutions will be sought which incorporate and combine the principles of highway safety with good design for the area, contributing to local distinctiveness. Opportunities for wildlife enhancement will also be encouraged.
- 10.17. Any new development should be of an appropriate type and scale so that it can be safely serviced by the existing road network. The traffic likely to be generated by development proposals should not exceed the capacity of the local road network; cause unacceptable deterioration in air quality or the natural or built environment; or prejudice road safety interests.
- 10.18. Contributions may be required for transport enhancements (including measures set out in Travel Plans) to improve the safety, enjoyment and convenience of non-car modes of travel including (but not necessarily limited to): footpaths, bridleways, cycleways, car-sharing

facilities, highways, public transport provision and infrastructure, car parking, motorcycle and bicycle parking and travel planning (GP5 Securing Planning Benefits - Planning Obligations).

TRANSPORT ASSESSMENTS

10.19. Whilst the majority of development proposals within the National Park are not likely to generate significant levels of traffic, such proposals may occasionally arise for example a farm diversification scheme or new visitor facility. In such cases, applicants will be required to prepare and submit a Transport Assessment (TA) or in less complex cases, a simplified Transport Statement⁴³⁵ in consultation with the relevant authorities, setting out the measures that will be taken to deal with the anticipated transport of the scheme, with emphasis on improving accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport. In addition, a Travel Plan (TP) should be produced to ensure that the proposal delivers sustainable travel outcomes including through minimising the level of trips generated, demonstrating how additional trips will be accommodated, and how accessibility to the site by different modes of transport will be achieved. If necessary, a separate Air Quality Assessment may be required to consider in more detail impacts on air quality and any mitigation required. Reference should also be made to Design and Access Statements (see CE-S7 Design and Sustainable Construction Principles). These Assessments will be used to determine whether the impact of the development in transport terms is acceptable (including the impacts of traffic generated, greenhouse gas emissions, impacts on air quality, road safety, and the special qualities of the National Park).

AC-D1 TRANSPORT AND ACCESSIBILITY REQUIREMENTS FOR DEVELOPMENT

- 1. In designing new development applicants should:**
 - a) Demonstrate all opportunities have been taken advantage of to encourage safe and sustainable modes of transport including through improved infrastructure such as foot and cycle paths, cycle parking and storage, rights of way improvements or linkages and electric charging points.**
 - b) Avoid community severance and ensure good access for pedestrians and cyclists from new development to nearby services and facilities including public transport links.**
 - c) Support the provision of car club and car sharing facilities where appropriate.**
 - d) Ensure that the design and details of highway works which are required for new development proposals are appropriate in scale to the development and contribute to the conservation or enhancement of the area in accordance with policies CE-S1, CE-S2, CE-S3, CE-S4 and CE-S7.**
- 2. Where development is likely to generate severe levels of traffic, applicants will be required to prepare a Transport Assessment or Transport Statement, an Air Quality Assessment where necessary, and a Travel Plan to ensure that the proposal delivers sustainable travel outcomes.**
- 3. Development which will cause unacceptable levels of traffic in terms of the environmental or physical capacity of the local road network, or would prejudice road safety interests, will not be permitted.**

⁴³⁵ National Planning Policy Framework (2012) DCLG para 32

TRAFFIC MANAGEMENT AND PARKING PROVISION

CONTEXT

- 10.20. The National Park has no major strategic road or rail corridors. The two principal routes on Exmoor are the A39 and A396, which form the main routes for traffic, including visitor traffic during the tourism season. The short section of A399 that passes through the western edge of the National Park is identified as a county freight route. Local freight routes, for local access only, are designated for the B3190 (Raleigh's Cross towards Washford Cross), the tertiary route from Machine Cross to Heathpoult Cross, and the east/west route across the National Park consisting of the B3224, B3223 and B3358. The small rural lanes framed by beech hedgerows serving local farms and communities are important to the character of the National Park and are important historic and attractive features in their own right. The responsibility for roads and traffic management lies with Devon and Somerset County Councils (as Highway Authorities), therefore the implementation of policies rely on a close working relationship with both authorities. The Exmoor Route Network, as shown on the Proposals Map and the Key Diagram, provides the framework to ensure that traffic uses roads most suited to the purpose of its journey.
- 10.21. Traffic flows on Exmoor are relatively stable, although levels increase significantly during the main summer months when greater numbers of visitors to the National Park. Although traffic pressures across the National Park as a whole are not severe there can be specific areas which face congestion issues and parking problems particularly during the busy holiday periods. The areas with the highest average daily traffic in the National Park where problems of congestion occur include Lynton/ Lynmouth, Dunster, Dulverton and Porlock as well as tourist hot-spots such as Tarr Steps and Valley of the Rocks.
- 10.22. The effects of traffic are seen in the congestion of streets and over-demand for parking space in some towns and villages at peak periods. This can result in a reduction in the quality of life including air quality and the experience of the National Park for residents and visitors, damage to the physical fabric of buildings and, in some cases, restrictions on the passage of buses and emergency vehicles. Conditions for pedestrians, cyclists, horse-riders and disabled people can be made difficult by traffic and inappropriate access by heavy goods vehicles (HGVs), which may contribute towards community severance and poor accessibility to local services including public transport. The National Park Authority will seek to ensure that the needs of more vulnerable road users such as walkers, cyclists and horse-riders are taken account of in traffic management.
- 10.23. In settlements, streets should be inclusive for all and attractive places in their own right rather than just corridors for traffic⁴³⁶ (see CE-S7 Design and Sustainable Construction Principles). Opportunities should be identified to minimise the adverse impacts of traffic and make provision for the needs of all users, giving priority to pedestrians and other non-car modes of travel. The National Park Authority will encourage innovative approaches to reconcile traffic and pedestrian movement including shared surfaces which can also reduce 'clutter' and enhance the street scene. Outside the named settlements there are concerns that high traffic speeds on narrow roads and lanes put other users such as walkers, horse riders and cyclists at risk. Where opportunities arise, the National Park Authority will encourage the provision of alternatives to busy roads that link up important footpaths and bridleways, safer crossing points, and other safety measures.
- 10.24. Some traditional bridges are showing signs of physical deterioration as they are carrying volumes and weights of vehicles greater than intended for its original use. The physical capacity of these roads and alignment is, in the main, unsuited to larger vehicles and heavy flows of traffic at higher speeds. It is important to ensure measures are adopted in partnership with relevant transport authorities to reduce the pressure on such bridges through the Exmoor Route Network and advisory routes, particularly for coaches and lorries.
- 10.25. Heavy goods vehicle (HGV) movements on roads within the National Park are at significantly lower levels in relation to total traffic flows but large vehicles can still cause problems on narrow roads and in villages across the National Park. There has been a significant increase in delivery vans, some of which is likely to have resulted from the growth in internet

⁴³⁶ DfT 'Manual for Streets' and 'Manual for Streets 2 - wider application of the principles'

shopping⁴³⁷. Whilst this is preferable in the National Park to additional HGV movements, such increases in traffic may in future benefit from co-ordination and shared deliveries using an appropriate size of vehicles suited to the small rural roads in the National Park.

- 10.26. The National Park Authority will support continued work by the Highways Authorities with hauliers and SatNav providers to encourage traffic, particularly lorries and HGVs, to use County Freight Routes to access the settlements on the edge of the National Park including Dunster, Minehead and Lynton/Lynmouth, with Local Freight Routes restricted to local access only (Exmoor Route Network as shown on the Proposals Map). The National Park Authority will also encourage Highways Authorities to ensure that diversionary routes and planned maintenance minimise disruption to local communities. The use of unsuitable will be discouraged through appropriate measures such as positive signing and SatNav route information.

PARKING

- 10.27. Parking provision is an important factor for Exmoor's communities and local businesses due to the high dependency on the car. However, providing adequate parking provision to reflect this, has to be balanced with impacts on landscape, the limited overall capacity of land available for development the National Park, and the need to encourage people to adopt sustainable modes of travel wherever possible and help contribute to reducing greenhouse gas emissions.
- 10.28. Within settlements, public car parks help to reduce the level of on-street parking and outside the tourism season can provide a useful facility for residents. In some locations there may be scope for rationalising, relocating or redesigning existing parking where this would achieve environmental gains. Reserving small car parks specifically for residents and the provision of community car parks within villages may also be part of an overall solution to parking problems, particularly if they are associated with other community facilities such as open amenity space, village hall or public toilets.
- 10.29. Exmoor is relatively well provided with parking facilities for countryside recreation. There is a presumption against providing for peak demand due to the impact on the natural and built environment, the seasonal and localised nature of congestion and the need to seek more sustainable solutions to the management of traffic and the demand for parking. Some existing car parks may be at risk from climate change and sea level rise, which will be covered by AC-S2 Transport Infrastructure. The emphasis will be to maximise the use of existing parking facilities. Extensions to existing sites or the creation of minor new facilities will only be contemplated where opportunities for informal recreation or new public access are developed, and always subject to conservation objectives (CE-S1 landscape character, CE-S2 biodiversity, CE-S4 cultural heritage).
- 10.30. The National Park Authority will work with Highways Authorities and local communities to find the best solutions to congestion and parking issues. Given the limited capacity for additional car parking and potential impact on special qualities, the focus will be on providing for community needs rather than peak parking capacity. Temporary solutions will be sought for peak parking demands in areas where this is causing environmental damage or adversely affecting the quality of life of local communities, including temporary provision of park and ride to manage parking and traffic at major events (AC-D3).

PARKING PROVISION AND STANDARDS

- 10.31. Policy AC-D2 guides parking provision in developments –the principle will be to minimise parking taking into account environmental constraints. Table [] *Guide to Parking standards* lists optimum levels of provision and is intended to guide applicants regarding the levels of car, cycle, motorcycle parking and parking for disabled people. Developments in more sustainable locations that are well served by public transport or have good walking and cycling links will be considered appropriate for lower levels of car parking provision. There may be circumstances such as change of use, or new development in restricted locations where it is not possible to accommodate parking. In order to enable otherwise appropriate development, the National

⁴³⁷ Somerset County Council Freight Strategy

Park Authority will take into account the proximity of public parking (including on-road parking) and public transport when considering applications. Applicants will be expected to provide clear evidence to justify higher car parking provision. Proposals for higher levels of cycle parking will be favourably considered.

- 10.32. As land capacity for development is limited in the National Park, the design of parking provision in developments should avoid 'land-hungry' approaches to car parking, promoting a design-led approach that is well integrated with a high quality public realm and streets that are pedestrian, cycle friendly⁴³⁸.
- 10.33. Policies RT-S1 (Recreation & Tourism), AC-S1 (Sustainable Transport) and AC-D1 (transport accessibility requirements for development) encourage walking and cycling both as a means of recreation but also to enable residents to access jobs, services and community facilities such as village halls and sports facilities. This can also support provision of Green Infrastructure (CE-S3, CE-D2). The National Park Authority has included standards for provision of cycle parking to encourage this, particularly in the named settlements. In most circumstances, 'Sheffield' type cycle parking stands will be adequate. At locations where stays are likely to be longer, for example at residential developments, workplaces, schools or hotels, secure, undercover cycle storage facilities will be required. Shared cycle parking facilities can be more efficient and require less space than individual facilities⁴³⁹. Motorcycling is also becoming more popular, and provision for motorcycle parking will also be encouraged in accordance with Policy AC-D2.
- 10.34. Policy AC-D2 also makes provision for people with disabilities. The design and dimensions for disabled parking bays should be in accordance with current Regulations⁴⁴⁰ and allow for sufficient space for people with disabilities to transfer from vehicle to wheelchair. Bays can be combined with common 'transfer zones' to reduce space requirements. Bays should be level, and the surface of the accessibility zone should be firm, durable and slip resistant.

AC-S3 TRAFFIC MANAGEMENT AND PARKING

- 1. The approach to traffic management on Exmoor will take into account the needs of all users including pedestrians, walkers, cyclists, horse-riders and disabled people, including through the use of shared surfaces where appropriate.**
- 2. The Exmoor Route Network, as shown on the Proposals Map, will form the framework for traffic management in the National Park.**
- 3. In the National Park there is a presumption against providing for peak parking demand. The National Park Authority will work with Highways Authorities, Town and Parish Councils and local communities to identify local solutions to congestion and parking issues in keeping with landscape character, providing for community needs and utilising temporary solutions for peak parking where necessary and appropriate.**
- 4. Proposals for new development should make adequate provision for parking in accordance with AC-D2.**

⁴³⁸ The Chartered Institution of Highways and Transportation, Guidance Note on Residential Parking, 2012

⁴³⁹ Manual for Streets

⁴⁴⁰ Building Regulations Part M

AC-D2 PARKING PROVISION AND STANDARDS

1. Proposals will be permitted where they make appropriate provision for parking including for bicycles, motorcycles, disabled users and car sharing, guided by the standards set out in Table 10.1.
2. Car parking provision should be minimised, taking into account environmental constraints. Parking provision should be well designed and integrated with a high quality built environment. Developments in more sustainable locations that are well served by public transport or have good walking and cycling links will be considered appropriate for lower levels or in appropriate cases, no car parking provision. Proposals for higher levels of cycle parking will be favourably considered.

Table 10.1: Schedule to Policy AC-D2 – Guide to Parking Standards

Use Class and Description	Cycle and Car parking
A1 Retail	Non-food: 1/50m ² Food: 1/16 m ²
A2 Financial and Professional Services	1/30 m ²
A3/A4/A5 Food and Drink	1/16m ²
B1 Business	1/30 m ²
B2 General Industrial	1/75 m ²
B8 General Warehouses and Distribution	1 car space per 200m ² and 1 lorry space per 250 m ²
C1 Hotels	1 per 2 bedrooms
C2 Residential Institutions (hospitals & nursing homes)	1/40m ² or 1 per 4 bedrooms
C3 Residential	1 or 2 bedrooms = 2 spaces 3, 4 or 4+ bedrooms = 3 spaces
D1 Non Residential Institutions	Health centres 1/25m ² Schools 1 /2 FTE staff + 2 visitor spaces Churches, halls, 1/20m ² HE/FE colleges 1/55m ²
D2 Assembly and Leisure	2a cinemas 1/12 seats 2b exhibition centres 1/22m ² Leisure centres 1/40m ²

- 10.35. Demand for parking can increase during the peak tourism season. There is a presumption against providing for permanent peak parking demand due to the impact on the natural and built environment in the National Park. Instead, the scale of car parking provision should be commensurate with the average daily usage annually. In order to address higher levels of parking which may arise for limited periods during peak season, temporary overflow measures may be permitted where current parking arrangements are causing an adverse impact on the environment and character of the area and/or the amenity of local communities.
- 10.36. The design of temporary measures should be in accordance with the requirements for permanent parking (AC-D2 Parking Provision and Standards) and should not have an adverse impact on the landscape, wildlife, character or amenity of the permanent use of the area. Any permanent change to the landscape character, design, surfacing or layout of the site will not be permitted, unless the site is brownfield and it can be demonstrated that the change will be an enhancement in accordance with Policy GP6 and accords with Policy CE-S7 Design and Sustainable Construction Principles. However, it is likely that most temporary parking sites will be on greenfield land and any grassed surfaces will need to be retained and can be conserved by using reinforced mesh which can help protect the vegetation and soil structure. The site should be returned to its original use, design and layout once the temporary parking use has ceased. Restoration measures may be required to mitigate any adverse impacts on wildlife which have resulted from the temporary usage. Any necessary boundary changes to the site will need to accord with this policy and will be of a temporary nature and be reverted to their original position once the temporary parking use has ceased.

AC-D3 TEMPORARY PARKING

Temporary overflow measures may be permitted to accommodate peak parking demand only where the shortfall in parking is causing an adverse impact on the environment and character of the area, sensitive habitats and wildlife species and/or the amenity of local communities. The design of the proposal should be in accordance with the requirements for permanent parking (AC-D2 Parking).

ELECTRICITY AND COMMUNICATIONS NETWORKS

Objective 17. *To achieve high quality telecommunications and essential utilities and infrastructure in ways commensurate with the conservation of the National Park's natural beauty, landscape wildlife, cultural heritage and special qualities.*

PURPOSE OF THE POLICIES

10.37. The policies support improvements to the telecommunications network and electricity infrastructure that will help to underpin the vitality and viability of Exmoor's communities and the economy, and help to reduce the need to travel by car, whilst ensuring that the conservation of the National Park's natural beauty, landscape, wildlife and cultural heritage is not compromised. All statutory undertakers, including utilities and telecoms companies, have a duty to have regard to National Park purposes under Section 62 of the Environment Act (1995).

NATIONAL POLICY CONTEXT

- 10.38. National policy recognises the vital role that communications networks have for sustainable economic growth and the provision of community services and facilities, and encourages local planning authorities to support the expansion of electronic communications networks that include mobile telecommunications and high speed broadband⁴⁴¹. The number of radio and telecommunication sites and masts should be kept to the minimum required for the efficient operation of the network, and any new sites should be sympathetically designed and camouflaged where appropriate.
- 10.39. Proposals for new telecommunications development should be supported by evidence to justify the development including consultation with other organisations, other possible siting opportunities (such as mast sharing, using existing buildings or structures), and certification that the development will not exceed non-ionising radiation protection guidelines.
- 10.40. The National Park Circular⁴⁴² encourages a communications infrastructure in National Parks that is fit for purpose so that they remain viable places for both businesses and communities to thrive (AC-S4 Electricity & Communications Networks).

CONTEXT

10.41. The rapid change and expansion of electronic communications technology and its increasing influence on how society and businesses function, means that access to digital technology and associated improvement of telecommunications infrastructure, including in rural areas, is a national priority⁴⁴³.

FIXED LINE ELECTRICITY & TELECOMMUNICATION NETWORKS

- 10.42. The majority of properties on Exmoor are connected to the mains electricity network – however there remain a number of properties in more remote locations in the National Park that are not connected to mains electricity and are therefore reliant on generators and renewable energy technologies to meet their energy needs.
- 10.43. The fixed-line telecommunications network (British Telecom infrastructure) provides the traditional fixed-line telephone service to the majority of households and businesses on Exmoor and also access to broadband for those households within a reasonable distance of an ADSL (asymmetric digital subscriber line) enabled telephone exchange. None of the telephone exchanges within the National Park have been upgraded to ADSL2+ to enable faster data transmission. In large, densely populated areas, the fixed-line copper cabling continues to be upgraded to fibre-optic to enable superfast broadband services direct to the home or to the nearest telecommunication cabinet. Although, the cost of delivering this type of technology to rural homes is likely to be more expensive due to the dispersed and small scale

⁴⁴¹ National Planning Policy Framework (2012) DCLG

⁴⁴² English National Parks and The Broads Circular (2010) DEFRA

⁴⁴³ Broadband Delivery UK (BDUK) – Department of Business Innovation and Skills

nature of rural settlements, the cost may reduce (see section on Broadband Internet Access below).

- 10.44. Overhead electronic and telecommunication transmission lines and poles are often disruptive features that adversely impact landscape and seascape character. Consultation events showed that a majority of respondents considered that there were too many in the National Park. Correspondingly there was support for undergrounding utility cabling to new developments and communities have expressed support for undergrounding overhead cables within settlements⁴⁴⁴. Western Power Distribution is working within the protected landscapes (National Parks and Areas of Outstanding Natural Beauty) in its region to identify potential areas for undergrounding existing overhead lines⁴⁴⁵. Within Exmoor National Park this has included programmes for undergrounding overhead lines in:
- a) **Dulverton Conservation Area** - to enhance the quality of the built heritage,
 - b) **Hawkcombe** – to enhance the open character of the moorland landscape, and
 - c) **Porlock Marsh** - to improve the character of the coastal landscape and seascape.
- 10.45. Undergrounding overhead telecommunication lines in sensitive landscapes is also desirable and will be sought where opportunities arise.

MOBILE PHONE NETWORK

- 10.46. The Mobile Cellular Communications Network (mobile phone) network also has an important social and economic function in today's society. The launch of the second generation (2G) digital transmission which introduced data services such as text messages, dramatically increased popularity of mobile phones and correspondingly the network coverage. In 2000 only half of UK adults had a mobile phone; by 2010 this had increased to 91%. With the introduction of 3G, progressively more people are accessing mobile broadband services via new electronic communication devices⁴⁴⁶. The launch of superfast mobile broadband networks (4G) in 2013 enables networks to have considerably greater capacity and speed.
- 10.47. On Exmoor the mobile telecommunications network consists of a number of base stations which consist generally of a range of structures including some form of mast or monopole, and is predominantly owned by one network operator Everything Everywhere (a merger between T-Mobile and Orange). However coverage is limited due to Exmoor's topography and low population density and some communities experience either poor or no access to the mobile network.
- 10.48. Another component of the communications network is the Airwave Network providing voice and data communications for essential public services such as the police, fire and ambulance services. This secure network covers around 99% of the country and is not available for public use⁴⁴⁷.

BROADBAND INTERNET ACCESS

- 10.49. Broadband internet access has become the 'fourth utility' for most of the UK's population. However there remains a broad divide between rural and urban areas in the quality and availability of this technology⁴⁴⁸. Where broadband internet is available and users have access to appropriate technology, the delivery of key public services has been transformed and businesses have the advantage of faster electronic communication.
- 10.50. The vast majority of Exmoor is served by British Telecom (BT) infrastructure, with a number of small scale satellite operators providing alternative networks in some communities. In sparsely populated rural areas such as Exmoor, areas known as 'not spots' and 'slow spots' exist where either there is no, or a very slow, broadband service due to the distance from the nearest telephone exchange.
- 10.51. The lack of access to high quality broadband in rural areas can have economic impacts on rural businesses, public service providers and communities. There is pressure on the farming

⁴⁴⁴ Your Future Exmoor consultation 2010

⁴⁴⁵ Western Power Distribution Report for Stakeholders 2010

⁴⁴⁶ www.mobilemastinfo.com (Mobile Operators Association)

⁴⁴⁷ www.airwavesolutions.co.uk

⁴⁴⁸ Mind the Gap (2008) Commission for Rural Communities

community to have a high level of broadband connectivity due to the requirements from DEFRA to submit information online. Farms are rural and isolated and therefore very often can be within areas where broadband delivery is constrained. Limited access to broadband can also have social and personal implications for people in rural areas⁴⁴⁹. Consultation highlighted that people were overwhelmingly in favour of ensuring that all communities in the National Park have access to broadband technology and enhanced mobile phone coverage⁴⁵⁰

- 10.52. The Devon and Somerset Local Broadband Plan will meet the government's Universal Service Commitment (USC) and the roll out of next generation access, to provide improved broadband to businesses and communities across Devon and Somerset⁴⁵¹.
- 10.53. The roll out of improved and superfast broadband across Devon and Somerset will help to address the digital deprivation experienced in rural areas. Much of the demand in rural areas is driven by online shopping, banking and communication. Currently, the incidence of rural home working is as much as three times greater than for urban areas nationally and within the National Park almost a third of the working age population works at or from home⁴⁵². The negative impacts of the digital divide are increasingly evident. However, existing telecommunications infrastructure has already benefited those rural areas with broadband access through: businesses relocating to rural areas from urban areas to enjoy a better quality of life; people moving out of cities on the basis they can work from home and access online services; and the potential for rural manufacturers and retailers to access worldwide markets⁴⁵³ (see AC-S1 Sustainable Transport). Improving and adapting this infrastructure can ensure that the social and economic benefits of accessing digital technology are available across the National Park.
- 10.54. It is likely that a mix of technologies will have a role to play in providing the USC for improved and superfast broadband in remote rural areas. Where geographic densities (premises per square kilometre) are low the most cost-effective solutions are expected to be fixed wireless or satellite technologies. Mobile broadband coverage is also likely to be part of the solution to complement fixed network infrastructure in rural areas⁴⁵⁴ (see AC-D4 Radio and Mobile Telecommunications Infrastructure).

INFRASTRUCTURE CONSIDERATIONS

- 10.55. Nationally significant infrastructure proposals will be determined by the Infrastructure Planning Unit within the Planning Inspectorate. A suite of national policy statements have been published to guide this process and substantial weight is given to ensuring the continued protection of National Parks⁴⁵⁵.
- 10.56. The National Park Authority encourages utility operators and network distributors (including broadband roll out) to enter into pre-application discussions relating to future proposals and the consideration of sharing infrastructure, technological advances and solutions, landscaping and design issues⁴⁵⁶. Proposals for electronic and communications development should accord with AC-S4 and the relevant development management policy.
- 10.57. A condition will be attached to any permission to ensure that where communications infrastructure becomes redundant it will be removed from the site and the land reinstated to achieve environmental enhancement, unless an alternative use for the site has been agreed by the Authority.

⁴⁴⁹ Rural Broadband: Why does it matter? (2011) Commission for Rural Communities

⁴⁵⁰ Your Future Exmoor Consultation 2010

⁴⁵¹ Connecting Devon and Somerset – Superfast Broadband Public Consultation (April 2012)

⁴⁵² 2001 Census – 31.35% of people aged 16 – 74 in employment who work mainly at or from home within Exmoor National Park (to update when 2011 census data becomes available)

⁴⁵³ Mind the Gap (2008) Commission for Rural Communities

⁴⁵⁴ Broadband Delivery UK Theoretical Exercise: Conclusions and lessons learned (December 2010).

⁴⁵⁵ Overarching National Policy Statement for Energy - Department of Energy & climate Change (2011)

⁴⁵⁶ Joint Accord – Association of National Park Authorities, the Association for Areas of Outstanding Natural Beauty, The Mobile Operators Association (2004)

AC-S4 ELECTRICITY AND COMMUNICATIONS NETWORKS

1. Development to improve the accessibility and standard of the electricity and telecommunications networks will be encouraged in order to contribute to thriving communities and businesses, and climate change mitigation. Great weight will be given to ensuring that the National Park and its special qualities are conserved and enhanced.
2. Proposals will be supported where:
 - a) the location, siting, scale and design of structures will not cause any adverse impacts on landscape and/or seascape character (CE-S1), visual amenity, biodiversity (CE-S2) and cultural heritage (CE-S4) of the National Park and are consistent with the requirements of policies AC-D4 – AC-D6;
 - b) co-operative working with partner organisations and utility operators has been demonstrated, to facilitate the sharing, utilisation and consolidation of existing communications infrastructure in rolling out new or improved communication technologies; and
 - c) provision is made for the removal of apparatus and reinstatement of land when the apparatus becomes redundant.
3. Major (GP3 Major Development) and nationally significant transmission infrastructure including high voltage transmission lines and landfall cabling and substations from large scale offshore renewable energy schemes will be resisted.

RADIO AND MOBILE TELECOMMUNICATION MASTS**CONTEXT**

10.58. The Mobile Operator's Association (MOA) represents the four largest mobile network operators (Everything Everywhere, Vodafone, O2 and 3UK) and has introduced ten commitments to best siting practice including improved consultation with communities, pre-application discussion with planning officers and agreement on site sharing⁴⁵⁷. The Association of National Park Authorities⁴⁵⁸ and National Association of Areas of Outstanding Natural Beauty hold a joint accord with the Mobile Operators Association that seeks to protect the special qualities of protected landscapes while making the best possible provision for telecommunication services⁴⁵⁹.

INFRASTRUCTURE CONSIDERATIONS

10.59. The natural beauty of the National Park means that many locations are particularly sensitive to mobile communications development due to the visual intrusion of the mast or monopole structure and its impact on landscape character. Such structures appear as incongruous in the landscape due to their utilitarian appearance and strong contrast to rural surroundings. The location and design (including form, overall height, colour, siting and setting) of telecommunication masts and the ancillary equipment associated with a radio base station are therefore particularly significant to ensure that the development does not conflict with the National Park designation. The National Park Authority will work with mobile operators to seek positive solutions to enable the roll out of mobile technology across Exmoor in a way compatible with the National Park designation.

10.60. In order to conserve and enhance the National Park, the optimal environmental solution will be sought including requiring the sharing of existing infrastructure, consolidation and enhancement of existing sites, siting on existing structures/features, or the use of 'stealth designs' (where masts are disguised as trees or concealed in other ways). As with other vertical structures such as wind turbines (CC-D4), the visual impact of telecommunication masts, i.e. when disguised as other structures such as trees, should be minimised by avoiding

⁴⁵⁷ www.mobilemastinfor.com

⁴⁵⁸ Now English Association of National Park Authorities (ENPAA)

⁴⁵⁹ ENPAA response to BIS Broadband deployment and sharing other utilities' infrastructure

breaking the skyline from public viewpoints including roads, public rights of way and access land. Other factors concerning siting may involve the site in relation to:

- a) Areas designated for their conservation value.
- b) Buildings including those of a historical or traditional character.
- c) Residential property.

AC-D4 RADIO AND MOBILE TELECOMMUNICATIONS INFRASTRUCTURE

1. **Proposals for radio and mobile telecommunications development will only be permitted where:**
 - a) **They will first seek to share existing infrastructure where there is capacity in landscape terms, and no increase in height of existing masts is required. Where it can be demonstrated that this is not possible:**
 - b) **Apparatus will be sited on existing features such as buildings or trees; to minimise adverse effects on landscape character. Where it can be demonstrated that this is not possible:**
 - c) **Apparatus is designed to be camouflaged and concealed as a natural or traditional feature as appropriate and will not be noticeable as a new telecommunications structure.**
2. **In determining all proposals:**
 - a) **the highest standards of design will be sought in terms of colour, dimensions, construction and overall shape to minimise any visual impact;**
 - b) **there will be no unacceptable cumulative or sequential visual impact with other vertical structures in the landscape;**
 - c) **there will be no adverse effects on sensitive habitats and wildlife species (CE-S2);**
 - d) **the amenity of nearby residents and visitors is protected;**
 - e) **there are no unacceptable impacts on heritage assets (CE-S4); and**
 - f) **opportunities for enhancement of the landscape including consolidation of any existing telecommunications infrastructure will be sought.**
3. **A condition will be attached to any planning consent to ensure that there will be ongoing management in place where trees are essential in providing camouflage to antenna within trees or for masts disguised as trees.**

FIXED LINE TRANSMISSION INFRASTRUCTURE

CONTEXT

10.61. In terms of electronic communications apparatus, the Electronic Communications Code⁴⁶⁰ ensures that code operators should notify the National Park Authority, as the planning authority, of any intention to install electronic communications apparatus. This does not include service lines or replacement lines or poles. However, the Growth and Infrastructure Act 2013 adds to the list of considerations to which the Government must have regard in making regulations on the application of the Electronic Communications Code, to include 'the need to promote economic growth'. As such the making of the regulations deems that any duties relating to the National Parks in England and Wales⁴⁶¹ have been complied with until 6th April 2018 to promote the roll out of superfast broadband across the country. It is therefore recognised that the ability of the policies in this Plan to influence infrastructure development will be limited during this period and will effectively be governed by primary and secondary

⁴⁶⁰ The Code was enacted to regulate landline telephone provision – it applies to infrastructure forming networks which support broadband, mobile internet and telephone, cable television and landlines. The code will be updated with regard to the Growth and Infrastructure Act.

⁴⁶¹ National Parks and Access to the Countryside Act 1949 – Section 11A Duty of certain bodies and persons to have regard to the purposes for which National Parks are designated (including statutory undertakers).

legislation⁴⁶² and a Code of Practice relating to the Electronic Communications Code for fixed line code operators⁴⁶³.

- 10.62. Development consent is needed from the Department of Energy and Climate Change for all but the most minor lines in England and Wales. However, certain exemptions for the installation or replacement of ‘minor’ overhead electric lines do not apply within National Parks and notice is required to be given to the National Park Authority of the proposal to consider whether there would likely to be a significant adverse effect on the environment⁴⁶⁴.
- 10.63. Overhead electricity⁴⁶⁵ and telecommunication lines have considerable visual impact particularly in rural landscapes – by creating visual clutter and appearing incongruous in the landscape. New electricity or telecommunications cabling, including service lines to new development and cabling from renewable energy technologies will be expected to be underground.

BROADBAND ROLL OUT

- 10.64. It is recognised that the roll out of superfast broadband is important for the future prosperity of rural communities, and can mitigate the effects of climate change through reducing the need to travel. Sharing existing infrastructure has the potential to minimise adverse landscape impacts in the National Park. The first consideration in terms of future broadband deployment should establish whether or not the roll out can be achieved through the sharing and/or upgrading of existing infrastructure such as BT’s telecommunications infrastructure; other telecommunications infrastructure including mobile phone masts; and other utilities infrastructure before other solutions are considered (AC-D4 Radio and Mobile Telecommunications Infrastructure).

OVERHEAD CABLING CONSIDERATIONS

- 10.65. Where it can be demonstrated that the need for the cabling (electricity and telecommunication cabling/lines) is essential in the National Park and cannot be addressed in another way, and that the cabling cannot be undergrounded because of other adverse impacts which can not be mitigated (consistent with policies CE-S1, CE-S2 and CE-S4) the National Park Authority will negotiate with the distribution network operator to select the least obtrusive route. The route should select a backdrop that makes sympathetic use of existing features such as hedgerows or wooded areas to break views of the line⁴⁶⁶ and particularly avoid highly sensitive open landscapes, such as moorland, and skyline intrusion.
- 10.66. There are no high voltage overhead transmission lines in the National Park (i.e. the National Grid) and any proposals for such infrastructure that may come forward in the future will be strongly resisted. The Holford Rules are guidelines on overhead line routing first drawn up in 1959 and remain valuable guidance for selecting and assessing potential routes. The first rule in particular seeks to avoid major areas of highest amenity value – such as National Parks.

GRID CONNECTIONS TO OFFSHORE RENEWABLE ENERGY SCHEMES

- 10.67. Grid connections and substation infrastructure through landfall (the area associated with joining the offshore and onshore cabling) from nationally significant off-shore renewable energy schemes⁴⁶⁷ will also be resisted as the installation of such major infrastructure would cause unacceptable damage to the sensitive landscape, seascape, natural environment and cultural heritage of the National Park. It is considered that the probability of such proposals along the Exmoor coast is low due to the high status of protection given to National Parks, as well as topographical constraints and the inability to connect to the National Grid transmission network.

⁴⁶² Part 24 of Schedule 2 to the General Permitted Development Order as amended by Statutory Instrument 2013 No. 1101 - The Town And Country Planning (General Permitted Development) (Amendment) (England) Order 2013

⁴⁶³ Cabinet Siting and Pole Siting Code of Practice – June 2013

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/205744/Final_Cabinet_and_Pole_Siting_COP_Issue_1_2_.pdf

⁴⁶⁴ Electricity – The Overhead Lines (Exemption)(England and Wales) Regulations 2009 – SI 2009/640

⁴⁶⁵ Electricity Act 1989

⁴⁶⁶ Holford Rules: <http://www.nationalgrid.com/NR/rdonlyres/E9E1520A-EB09-4AD7-840B-A114A84677E7/41421/HolfordRules1.pdf>

⁴⁶⁷ Overarching National Policy Statement for Energy (2011) DECC

- 10.68. Exmoor National Park has had positive experience of small scale marine renewable energy installations and associated landfall (such as the single experimental marine turbine that was installed off the coast from Lynmouth); this technology contributes towards climate change mitigation and aspirations to become a carbon neutral National Park. Such small scale renewable energy technology is likely to be significantly less harmful in terms of the impacts on seascape (CE-S1), biodiversity (CE-S2) and cultural heritage (CE-S4). Proposals for small-scale/experimental marine energy technologies will be supported where the proposal is such that there is sufficient capacity within the existing electricity infrastructure or minimal upgrading of existing infrastructure is required. In these circumstances it should be demonstrated that the development is carried out to the highest environmental standards and any potential impacts, including within areas at risk of coastal change and flooding (CC-D1, CC-S1 and CC-S2), can be avoided or mitigated. Proposals seeking the replacement of existing electricity or telecommunication infrastructure in areas at risk of coastal change and/or flooding should comply with policies CC-D1 and CC-S2.

AC-D5 FIXED LINE TRANSMISSION INFRASTRUCTURE

- 1. Proposals for new transmission lines will only be permitted where they are routed underground, unless they will conflict with policies CE-S1, CE-S2, CE-S4 and the need for the service cannot be met in any other way. In this circumstance, proposals for overhead lines may only be permitted where the visual impact is minimised by selecting the least obtrusive route and where it will not cross any moorland or open landscapes, or break the skyline.**
- 2. Proposals relating to low voltage electrical cabling from renewable energy technologies (CC-S3) will only be permitted where:**
 - a) they will be routed underground;**
 - b) they will not adversely affect landscape and seascape character biodiversity, cultural heritage or recreational use of the coast; and**
 - c) there is adequate infrastructure to connect cabling nearby that does not require substantial modification or upgrading, or where any modification /upgrading to existing infrastructure is minimal and will not have any unacceptable impact.**
- 3. Development proposals that include electricity or telecommunication service lines to new development will be expected to provide underground routing subject to policies CE-S1, CE-S2 and CE-S4.**

SATELLITE ANTENNAE

CONTEXT

- 10.69. A significant number of satellite antennae have been installed on traditional buildings throughout the National Park, and their continuing proliferation to access digital TV and more recently satellite broadband, is a cause for concern. It is recognised that some remoter broadband 'not spots' and 'slow spots' may require either fixed wireless or satellite broadband solutions for the short to medium term, until the upgrading of existing landlines to fibre-optic broadband and/or 4G mobile broadband is achieved. The optimal solution will be based on the local topography and clustering of properties.
- 10.70. There are restrictions on the number and size of antennae which may be installed on buildings as permitted development; and in the National Park antennae also cannot be installed on a chimney, wall or roof slope which faces onto and is visible from a road without planning consent⁴⁶⁸. The installation of antennae on a listed building will also require listed building consent. Where planning permission is required, the National Park Authority will seek to ensure that antennae are attached to the least obtrusive part of the building possible and are of the most appropriate design and size available (AC-D6 Satellite Antennae). Property

⁴⁶⁸ ODPM Circular 10/2005 Permitted development rights for antennas

owners intending to install antennae under permitted development rights will be encouraged to do likewise.

FIXED WIRELESS ACCESS

10.71. Many fixed wireless access (FWA) broadband solutions may be considered as *de minimis* i.e. development not requiring planning consent – as most connections to premises will consist of a small micro wireless cell or antenna on the exterior of a building. These require line of sight to a community access point or base station which is slightly larger and likely to be similar in scale to a conventional TV aerial/satellite antenna. The scale of new technology and the speed it is being developed means that future FWA technologies are likely to be less obtrusive. The National Park Authority encourages early discussions to provide guidance on whether or not proposals are likely to require planning permission and to discuss options to minimise impacts on the National Park. Where planning permission may be required for FWA transmitter structures, then the principles set out in AC-S4 and those relating to satellite antennae (AC-D6) or telecommunications structures (AC-D4) will apply, depending on scale.

AC-D6 SATELLITE ANTENNAE

- 1. The installation of satellite antennae or wireless broadband equipment will be permitted where they are sited unobtrusively and are of a scale and design which will not cause unacceptable harm, either individually or cumulatively, to the historic or architectural interest of traditional buildings, the street scene, or overall landscape or settlement character.**
- 2. Installations that reduce the unacceptable harm caused by the cumulative visual impact of individual technologies will be favourably considered in relation to the tests above.**

11. EXMOOR'S SETTLEMENTS

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

Partnership Plan Priority C1: *Support community led initiatives that help to meet local needs.*

- 11.1. This section of the Local Plan sets out information that applies to defined settlements within the National Park (GP4 Spatial Strategy). For each settlement there is an inset map⁴⁶⁹ and written statement. The written statement outlines the key aspects of each settlement in relation to its setting, built environment and local services. Where they have been prepared, parish and other community-led plans have also been taken into account.
- 11.2. The inset maps associated with each settlement identify particular areas or features that are important for social or environmental reasons, which are needed to interpret and apply Local Plan policies at a settlement level including areas at risk of flooding, wildlife designations and Conservation Areas.

SUPPORTING LOCAL COMMUNITIES

PURPOSE OF THE POLICY

- 11.3. Policy ES-S1 positively supports local communities that wish to progress community-led initiatives through advice and support provided by the National Park Authority and other relevant partners and organisations to help identify and plan for their priorities that will help to sustain and enhance Exmoor's settlements in the longer term.

NATIONAL POLICY CONTEXT

- 11.4. National policy states that Local Plans are key to delivering sustainable development that reflects the vision and aspirations of local communities and also provides a framework to enable local people to produce their own distinctive plans for their neighbourhood or parish area.
- 11.5. Core planning principles include empowering local people to shape their surroundings with succinct local and neighbourhood plans and supporting community-led initiatives for renewable and low carbon energy.
- 11.6. The National Parks' Circular⁴⁷⁰ vision particularly identifies the communities of the National Parks taking an active part in decisions about their future in terms of transforming to a low carbon society and sustainable living. Progress towards achieving the vision can be made through National Park Authorities and key partners together fostering and maintaining vibrant, healthy and productive living and working communities. Resident communities are acknowledged as having the awareness of the special value of their own locality and should be encouraged to take an increasingly active role in decision making.

CONTEXT

- 11.7. The 21 'Your Future Exmoor' (YFE) consultation events held in towns and villages across Exmoor during 2010 gave communities the opportunity to raise issues in relation to their parish and settlement and to particularly highlight what they valued. Some common issues raised by communities through the YFE events included the importance of local services, reducing unnecessary signage and light pollution, provision of affordable housing for local communities, and the lack of mobile phone and broadband coverage. Where these more general issues relate to development and land use, they are addressed through relevant policies in the Local Plan and actions set out in the Partnership Plan.

⁴⁶⁹ The inset maps for each settlement will form part of the Exmoor National Park Proposals [Policy Planning] Map.

⁴⁷⁰ English National Parks and the Broads – UK Government Vision and Circular 2010 DEFRA

- 11.8. It is recognised that the issues raised at the ‘YFE’ events are derived from the time these consultations took place and that subsequent community projects and priorities could arise during the lifetime of the Local Plan. Communities may wish to address such issues, through a project, parish plan or the preparation of a planning document.
- 11.9. The Partnership Plan includes a strategic activity under Priority C1, for partners “to support and work with Exmoor’s communities to plan for and achieve their aspirations”. Therefore proposals for projects or plans that communities would like to progress can be addressed through the Partnership Plan. This is a practical and positive means of identifying and progressing community aspirations that can be revised as new projects/plans come forward, and enable progress with existing projects to be monitored.
- 11.10. Support and advice may include working with communities to help bring forward development that accords with the policies set out in the Local Plan. Suitable tools could include parish plans, supplementary planning documents (SPDs) or Area Action Plans for larger projects. The Authority also has a duty to support Neighbourhood Planning including the preparation of Neighbourhood Plans or Neighbourhood Development Orders, to address specific issues within a community.

ES-S1 SUPPORTING LOCAL COMMUNITIES

- 1. Where Parish and Town Councils and local communities have identified priorities and plans for the development they need to sustain their settlements over the longer term, the Authority will provide advice and support to help them be achieved.**
- 2. Advice will include whether any plans or projects would require a ‘test of likely significance’ under the Habitats Regulations 2010 for potential effects on the integrity of features within or outside designated Special Areas of Conservation.**

LOCAL SERVICE CENTRES

DULVERTON

See inset map 1

SETTING

- 11.11. Dulverton lies on the southern boundary of the National Park within the incised wooded valley landscape character area of the River Barle. The Barle valley broadens considerably and much of the town has a gently sloping south and west facing aspect with some areas at risk of flooding. The main A396 route lies a mile to the east with the B3222 passing directly through the town via the High Street and the B3223, leading off from Fore Street towards Winsford Hill.
- 11.12. The surrounding woodland areas are important for wildlife particularly Burrige Woods that are internationally designated for their wildlife importance. There are a number of trees within and adjoining the settlement that are protected through Tree Preservation Orders. The parkland setting of Pixton House also has a number of veteran trees, which are important to the landscape setting of the town.

BUILT ENVIRONMENT

- 11.13. The inherent character of Dulverton is that of a long established small market town. The conservation area was designated in 1994 and includes most of the earlier pre-19th century settlement. Dulverton retained its compact plan with the main concentration of buildings in Fore Street, High Street and Bank Square and adjoining lanes until the early 20th century.
- 11.14. The post-war development of housing estates to the east of the historic settlement has in effect doubled the size of the built-up area. The pattern of development bears very little resemblance to the historic core, and it is visually separated by small fields, either side of the well-used Abbot's Way footpath which forms a link between the old and new parts of the settlement. A number of local affordable homes have been developed in Dulverton including twelve homes at Allers View.



Fore Street, Dulverton

LOCAL SERVICES

- 11.15. Dulverton provides a wide range services and facilities for the local community and surrounding communities within and outside the National Park. The centre of the settlement has a variety of shops, tearooms and restaurants, in addition to a hotel, pubs and a number of offices. The town is an important visitor destination for those visiting or staying on Exmoor, and there are several shops and facilities to cater for their needs. The number of shops,

businesses and community facilities is therefore considered to be relatively high compared to other settlements of this size outside the National Park⁴⁷¹.

- 11.16. All Saints First School and Dulverton Middle School are both located within the eastern part of the settlement, which includes the Dulverton Children's Centre and Kids'R'Us facilities. Fishers Mead Community Centre and the new Dulverton Medical Centre are also located in this area; accessed from Jury Road (B3222) via Amory Road and Barnsclose.
- 11.17. Dulverton is relatively well served by public transport with regular bus services to Tiverton, Minehead, Taunton and Barnstaple - however there is no hourly service or many services available in the evenings or on Sundays.

DULVERTON PARISH PLAN

- 11.18. Dulverton Parish Plan results were published in 2010 which expressed the views of residents under a series of topic headings. Many of the issues raised through the parish plan (and the YFE) consultation have been resolved or are in the process of being resolved. A number of projects that have been completed include the provision of allotments and refurbishment of the Barnsclose playground.

POTENTIAL COMMUNITY PROJECT

- 11.19. The Town Council has highlighted the need to safeguard land for use as a cemetery as the existing cemetery is nearing capacity. This area is shown as a 'community safeguarding area on the Dulverton Inset Map 1, and will be safeguarded from other forms of development under policy HC-S7 Local Commercial Services and Community Facilities.

ES-D1 DULVERTON COMMUNITY SAFEGUARDING AREA

Land adjacent to the cemetery in Dulverton, as shown on Inset Map 1, is allocated for an extension to the existing cemetery.

⁴⁷¹ Further detailed analysis for retail and leisure uses in Dulverton can be found in the Quantitative Needs Assessment – West Somerset Council & Exmoor National Park Authority 2011

DUNSTER

SETTING

- 11.20. The parish of Dunster lies partly within the National Park boundary. The main settlement is Dunster situated on the A396 close to the junction with the A39. The settlement known as Dunster Marsh is located to the north east of the A39 outside the National Park boundary within the local planning area of West Somerset Council.
- 11.21. Dunster occupies a unique landscape setting within the Avill Valley, surrounded by the wooded hills of Grabbist and Gallox Hill including the historic park and gardens associated with the castle which are a designated heritage asset. The setting of the village is dominated by Dunster Castle on its elevated site while the Yarn Market is an important landmark in the High Street.

BUILT ENVIRONMENT

- 11.22. Dunster is regarded as one of the finest examples of a medieval settlement in the country. Pevsner, in the “Buildings of England” series describes Dunster as “unsurpassed in Somerset amongst small towns”. The settlement has a notable history dating from the early 10th century.
- 11.23. The Conservation Area was designated in 1973, and further revised in 1980; it includes the historic core of the settlement which is based on the medieval street pattern and burgage plots around the Castle, church and priory. Due to the historic importance of the settlement it is not surprising that there are 120 listed buildings including four Grade I and six Grade II*. Dunster Castle is a Grade I Listed Building owned by the National Trust since 1976. Other prominent Grade I listed historic buildings are the Priory Church of St George and the Yarn Market. Many houses are small cottages that are either built of stone, some with slate hanging or rendered and roofed using materials such as thatch, natural slate or clay tiles.
- 11.24. Some limited post-war development has taken place on the fringes or as infill. The former garage/car showroom complex adjacent to Dunster Steep is now collectively termed as Dunster Visitor Centre and comprises a number of retail outlets and the National Park Centre. One of the most notable successes for the settlement was the restoration of the Tithe Barn to provide a community facility for meetings and events. Other enhancements include village signs and heritage trail and the footpath linking the Dunster Steep car park to Gallox Bridge (see the Dunster Action Plan for further details).
- 11.25. The main A396 tourist route through the village has significant traffic impacts on the historic character of the settlement. The levels of traffic during peak holiday periods can cause some localised congestion, particularly either side of the traffic lights that limit the traffic to one-way through Church Street. Ben Hamilton-Baillie Associates carried out a detailed analysis and prepared proposals in the future design and maintenance of Dunster’s streets and spaces in 2009⁴⁷². The improved pedestrian walkway, through re-setting the cobbled frontage and incorporating smooth linear paving strips along the eastern side of the High Street, was one of the recommendations in this analysis.

LOCAL SERVICES

- 11.26. As a renowned historic village tourism industry is the mainstay of the local economy⁴⁷³. Dunster is a popular tourist destination and there are several shops, cafés and restaurants in the village which cater for visitors. Key community facilities include Dunster First School, the GP surgery, Post Office, Dunster Tithe Barn, and the Memorial Hall. Recreation areas include the children’s play area, the allotments, and Dolland’s Meadow recreation field.
- 11.27. Dunster is well-served by public transport, with daily services travelling through the village, and at Dunster Steep on the A39. People can easily access Minehead and other towns including Taunton and Tiverton.

⁴⁷² Dunster: Reconciling Place and Movement in an Historic Village – Ben Hamilton-Baillie Associates Ltd (2009)

⁴⁷³ Further detailed analysis for retail and leisure uses in Dunster can be found in the Quantitative Needs Assessment – West Somerset Council & Exmoor National Park Authority 2011



Dunster Castle overlooking the High Street with the Yarn Market in the foreground

DUNSTER ACTION PLAN

11.28. The Dunster Working Group is a partnership of local authorities, voluntary organisations and businesses that seek to enhance the environmental quality, economic viability and social well-being for Dunster Village and the surrounding area. As a result of extensive consultation the Dunster Action Plan⁴⁷⁴ presents a range of enhancement projects for the village, including detailed analysis and proposals by Ben Hamilton-Baillie Associates relating to future design, management and maintenance of streets and the public realm.

11.29. The vision for the plan is:

“Dunster will be the best medieval village in England that meets the future needs of the whole community, fosters a thriving economy and provides a welcome for visitors while conserving its unique natural and historic environment”

⁴⁷⁴ A Draft Action Plan for Dunster 2012 to 2014

LYNTON & LYNMOUTH

See inset map 3/3a

SETTING

- 11.30. Lynton, Lynmouth and Lynbridge are considered together as one settlement (Lynton & Lynmouth) with a range of services and facilities serving the local and wider community. Barbrook is a separate village within the parish distinct from Lynton and Lynmouth.
- 11.31. Lynton & Lynmouth is situated on the coast with the settlement of Lynton situated in a cliff-top position around 150 metres above Lynmouth. Lynton is approached by road via the B3234 from Lynmouth or Barbrook, which links with the A39. The steep gradients of Countisbury Hill on the A39 and on the B3234 from Lynmouth tend to emphasize a sense of seclusion.
- 11.32. The settlement area is defined by its densely wooded setting within the high wooded coast and combes landscape character area. Much of this woodland is protected for its landscape significance and the woodland in the East Lyn valley towards Watersmeet is also internationally designated for its ecological importance⁴⁷⁵.
- 11.33. Lynton is the larger of the two settlements, and unlike other Exmoor settlements, is of more recent origin mainly resulting from a period of rapid development from the late 19th to early 20th century. This was influenced by the development of the Lynton to Barnstaple narrow gauge railway and the construction of the Cliff Railway between the two settlements. The Lynton to Barnstaple railway closed in the 1930s, but a short section has been reopened at the former Woody Bay Station in 2004, as a tourist attraction, with long term plans to reinstate the full length of the former railway.
- 11.34. Lynmouth has a small harbour, and is situated at the confluence of the East Lyn and West Lyn rivers. It is renowned for the catastrophic flood in 1952 which resulted in loss of life and the destruction of many buildings. Resulting changes led to the realignment of part of the river and the construction of Lyndale Bridge and Riverside Road. A hydro-electric power plant is situated at Glen Lyn on the River West Lyn and an experimental marine tidal turbine generator was sited off the coast from Lynmouth from 2003 – 2007. Lynmouth is part of the South West Marine Energy Park and there are plans to deploy a full scale tidal power generator in 2014⁴⁷⁶.

BUILT ENVIRONMENT

- 11.35. The Lynmouth Conservation Area was designated in 1973 and includes; the original fishing settlement around the harbour and the mainly 19th century development along the West Lyn and on the slopes above the main village. The Lynton Conservation Area was designated later, in 1986 and includes the historic pre-nineteenth century core and the area dating from the settlements' expansion in the Victorian era.
- 11.36. Modern development has generally occurred in Lynton as the coast and deep valley settings of Lynmouth are significant constraints in relation to considering new development. Many residential dwellings have been provided through change of use of existing buildings such as hotels or on other brownfield sites such as the Castle Heights development. A number of local affordable homes have been provided including eight units of local affordable housing in Burvill Street through the redevelopment of the Hobbs Yard and the adjacent chapel.

LOCAL SERVICES

- 11.37. Many of the well established local businesses in Lynton and Lynmouth are related to the tourism and service sector which provide employment opportunities for people in the local area - hotels being the largest employer. There are also a wide range of community services and facilities present, including the health centre and primary school, which have been sustained due to the relative isolation and consequent high level of self-containment of the settlement⁴⁷⁷.

⁴⁷⁵ Exmoor & Quantocks Oakwoods Special Area of Conservation

⁴⁷⁶ <http://www.pulsetidal.com/pulse-tidal-plans-commercial-demonstration-at-lynmouth.html>

⁴⁷⁷ Further detailed analysis for retail and leisure uses in Lynton & Lynmouth can be found in the Quantitative Needs Assessment – West Somerset Council & Exmoor National Park Authority 2011

- 11.38. The town is served by a regular Monday to Saturday bus service which enables members of the community to access a wider range of services and facilities at Barnstaple. There is an additional seasonal service which runs between Minehead and Ilfracombe via Lynton & Lynmouth. The Ilfracombe Ring & Ride Scheme is a community transport scheme that operates within a number of towns and rural locations including Lynton & Lynmouth.

LYNTON & LYNMOUTH NEIGHBOURHOOD PLAN

PURPOSE OF THE POLICY

- 11.39. Due to the particular circumstances relating to the timing and preparation of The Lyn Plan (Lynton & Lynmouth Neighbourhood Plan) and to ensure that the policies within the neighbourhood plan are not invalidated by the policies in this plan⁴⁷⁸ should a conflict between policies arise, a statement regarding its status is included in policy ES-S2 Lynton & Lynmouth Neighbourhood Plan.

NATIONAL POLICY CONTEXT

- 11.40. National policy gives communities power to develop a shared vision for their neighbourhood or parish to deliver the sustainable development they need through neighbourhood planning. Neighbourhood Plans must be in general conformity with the strategic policies of the Local Plan and when it is brought into force the policies it contains will take precedence over existing non-strategic policies⁴⁷⁹.
- 11.41. Neighbourhoods (parishes) should plan positively to support local development to shape and direct development in their area outside the strategic elements of the Local Plan⁴⁸⁰.

CONTEXT

- 11.42. The Lyn & Exmoor Community Plan was produced in 2006 and set out the vision and priorities for Lynton & Lynmouth and surrounding parishes (Brendon & Countisbury, Martinhoe, Parracombe, & Challacombe). The Localism Act introduced new powers for neighbourhood planning to enable communities to prepare Neighbourhood Development Plans. The Government introduced Neighbourhood Plan Vanguards Scheme whereby Lynton and Lynmouth Town Council, with the support of other partners, were successful in their bid to become one of the first areas to trial neighbourhood planning. The Neighbourhood Plan process enables Lynton & Lynmouth Town Council and the wider community to build on previous engagement with the local community on the strategy and detail for the types of development needed for the long term sustainable future of the parish.
- 11.43. The Lyn Plan (Lynton & Lynmouth Neighbourhood Plan) has reached an advanced stage and contains a range of policies relating to development and land use within the parish. It has been prepared to ensure that it is in general conformity with those policies considered to be strategic within the Exmoor National Park Local Plan 2001-2011 and in conjunction with the preparation of this Local Plan. It is considered therefore, that the policies in the Lyn Plan will also be in general conformity with the strategic policies in this Local Plan.
- 11.44. The neighbourhood plan will be brought into force as part of the development plan for the area if over half those voting in the referendum have voted in favour of the plan. If the neighbourhood plan is successful it will become part of the development plan prior to the adoption of this Local Plan.

⁴⁷⁸ Planning & Compulsory Purchase Act 2004 Section 38(5) – if to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approved or published (as the case may be).

⁴⁷⁹ National Planning Policy Framework (DCLG 2012) – paras 183-185

⁴⁸⁰ National Planning Policy Framework (DCLG 2012) – para 16

ES-S2 LYNTON & LYNMOUTH NEIGHBOURHOOD PLAN

- 1. Development proposals within Lynton & Lynmouth parish shall be determined in accordance with the Lynton & Lynmouth Neighbourhood Plan 2013 – 2028 and the strategic policies of the Local Plan. Development management policies in the Local Plan will only be given greater weight where the Neighbourhood Plan is silent, indeterminate or out of date.**
- 2. Should a conflict arise between development management policies in the Local Plan and the policies in the Neighbourhood Plan, the conflict will be resolved in favour of the Neighbourhood Plan until the end of the plan period in 2028 or until it is reviewed, whichever is earlier, unless it is considered that the proposal would otherwise have a detrimental impact on the achievement of National Park purposes.**

PORLOCK

See inset map 4

SETTING

- 11.45. Porlock is located near the coast and sits at the point where the low farmed landscape of the Vale of Porlock meets the high wooded coastal landscape character of Worthy Wood and Hawkcombe. The steep hill-sides of Bossington Hill form a backdrop to flat fields extending to Porlock shingle-ridge and saltmarsh and the Bristol Channel.
- 11.46. Porlock is located between Minehead six miles to the east and Lynton, about fifteen miles to the west. The A39 passes through the village and up Porlock Hill, with a 1 in 4 gradient and sharp hairpin bends that can act as a barrier to some traffic. The privately owned toll road provides an alternative route avoiding Porlock Hill. Traffic congestion through the centre of Porlock, is considered a problem and mainly experienced during the peak holiday period.

BUILT ENVIRONMENT

- 11.47. Porlock has a conservation area that was designated in 1984 and extended in 1987. It includes much of the historic pre-19th century settlement. There are a number of 18th century and earlier cottages with characteristic front projecting stacks. Much building and re-building occurred late in the 19th century and into the early 20th century. Within the conservation area are 10 listed building entries. The majority are grade II listed, although the Parish Church and Doverhay Manor are grade I and grade II* listed respectively. The protection of the conservation area and the built heritage of the parish are considered to be important locally.
- 11.48. On the flatter land to the north of the village lies a substantial area of post-war housing with newer housing built in 1970s-1980s on the eastern side of the village.

LOCAL SERVICES

- 11.49. Porlock has a wide range of services and facilities that serve the local population and surrounding communities. Porlock, similar to other local service centres, is a popular tourist destination and there are a range of businesses which are supported by the local community and visitors to the settlement. The Porlock Visitor Centre works to promote the local area and Exmoor as a whole.
- 11.50. The community services and facilities in the village include St Dubricius First School, the medical practice, village hall, recreation ground, pharmacy, convenience stores, Post Office, fire station, petrol station, and places of worship. Porlock also has a variety of shops, guest houses, hotels and cafés – many of which are located on the High Street⁴⁸¹.
- 11.51. There is a daily bus service which links Porlock to the coastal town of Minehead which lies just outside the National Park boundary and provides a wide range of services and facilities, including additional public transport links to further afield. A seasonal bus service from Minehead to Lynmouth passes through the village and also operates on a daily basis.

PORLOCK VALE PARISH PLAN

- 11.52. The Porlock Vale Parish Plan “Shaping Our Future” was published following extensive community consultation – this plan identified a wide range of issues that were reviewed to inform a series of actions defined as Priority 1 or 2. Priorities that are linked to planning and land use included more affordable homes for local families, improved footpath access and cycle route creation. A scheme providing 15 affordable homes for local people has been subsequently developed at Villes Lane.

⁴⁸¹ Further detailed analysis for retail and leisure uses in Porlock can be found in the Quantitative Needs Assessment – West Somerset Council & Exmoor National Park Authority 2011

VILLAGES

BARBROOK

SETTING

- 11.53. The settlement of Barbrook is within the parish of Lynton and Lynmouth. The village lies on the junction of the B3234 and the A39 approximately 1 mile south from the larger settlement Lynton & Lynmouth. The character and form of the village are influenced by its valley setting. Additionally, the main roads that pass through Barbrook and the level of traffic, particularly during the peak holiday season, has an impact.
- 11.54. Barbrook has an impressive landscape setting within densely wooded valleys that form a backdrop to the village. Some areas of the surrounding woodlands are protected by tree preservation orders (TPOs), or are local wildlife sites or identified as woodland whose natural beauty is particularly important to conserve (Section 3 woodland⁴⁸²). Land to the north side of Dean Steep is a Site of Special Scientific Interest (SSSI) that was notified due to its geological significance and includes the former quarry area.

BUILT ENVIRONMENT

- 11.55. There are a number of small traditional cottages grouped around the A39 and West Lyn River. The settlement has expanded along the A39 towards Dean Steep and the B3234 towards Lynton due to a considerable level of post-war development continuing to the 1980s. Some of this post-war development replaced buildings lost during the 1952 flood disaster.

LOCAL SERVICES

- 11.56. Although the Post Office closed through the last round of closures in 2008, there is a petrol filling station and shop at Cherry Bridge in the centre of the village. The petrol station is the closest such facility for some distance and is an important local service for the wider community as well as for visitors to the National Park. There is also a plant nursery on the edge of the village.
- 11.57. The village has access to public transport via the year-round, daily bus service from Lynton & Lynmouth to Barnstaple. As for Lynton & Lynmouth, Barbrook also benefits from the seasonal service which runs between Minehead and Ilfracombe and the Ilfracombe Ring & Ride community car scheme.

LYNTON & LYNMOUTH NEIGHBOURHOOD PLAN

- 11.58. Barbrook is also part of the Neighbourhood Plan Vanguard Scheme whereby Lynton and Lynmouth Town Council, with the support of others partners, were successful in their bid to become one of the first areas to trial Neighbourhood Planning. This process enables the Town Council and wider community to build on previous engagement with the local community on both strategy and detail for the development needed for the long term sustainable future of the parish (see Policy ES-S2 above).

⁴⁸² Wildlife and Countryside (Amendment) Act 1985 Section 3

BRENDON

SETTING

- 11.59. Brendon is a small village situated in the East Lyn valley, some four miles east of Lynton & Lynmouth, within the North Devon area of the National Park. The village is immediately surrounded by permanent pasture, but set within landscape of a high coastal woodland combes. Brendon is accessed via a number of minor roads leading off the A39 and B3223.
- 11.60. Due to its riverside setting a considerable area of the village is within an area at risk of flooding, including local amenities. Mill Wood to the west of the village is an internationally designated habitat – part of the Exmoor and Quantocks Oakwoods Special Area of Conservation.



Cottages in Brendon

BUILT ENVIRONMENT

- 11.61. The village is linear in form due to the steep valley sides and riverside setting, and development tends to front directly on to the road. Grey sandstone, white painted stone buildings with slate roofs are the principal building materials of the traditional cottages, farms and farm buildings. Leeford Bridge and the bridge immediately to the south are both grade II listed structures as is Hall Farmhouse at the edge of the settlement. Modern development has centred around the area of Leeford Green and is predominantly large detached dwellings set back from the road.

LOCAL SERVICES

- 11.62. Brendon is popular with tourists due to its attractive moorland and valley setting particularly in relation to the 'Doone Valley' from Malmsmead following Badgworthy Water upstream. Tourism is essential to the local economy with several local businesses reliant on visitors to the area, including the Staghunters Inn Hotel, guest houses and B&Bs in the village.
- 11.63. There is no public transport serving the local community although the parish is within the Ilfracombe and District Ring and Ride community transport scheme.

BRIDGETOWN & EXTON

SETTING

- 11.64. The adjoining settlements of Bridgetown and Exton are the two main settlements in Exton parish and are generally considered as one community. For this reason they are identified as one settlement within the Local Plan. The A396 is one of the main tourist routes in the National Park and passes directly through Bridgetown.
- 11.65. Bridgetown and Exton lie in the incised, wooded Exe Valley, interspersed with improved pasture that defines much of the floodplain landscape. Bridgetown Wood and Rabbit Wood are designated local wildlife sites.



Week Lane, Bridgetown

BUILT ENVIRONMENT

- 11.66. The settlement of Bridgetown is linear in form as it follows the river valley and is largely aligned with the main road. Due to its proximity to the River Exe, a number of buildings are at risk of flooding. Exton is a more tightly knit group of traditional buildings that includes the parish church, on the steep hillside north-east of Bridgetown. Due to its topography and built form there are some issues with access and parking.
- 11.67. Many of the traditional buildings within the settlements are exposed stone or rendered stone with slate roofs. Most modern development has been located in Bridgetown, as infill development along the A396 and to the west of the River Exe.

LOCAL SERVICES

- 11.68. Community facilities within Bridgetown include the pub, cricket ground and the recently refurbished village hall. There is also a camping and caravan site in the village located next to the River Exe. A regular bus service, between Minehead and Tiverton, serves the settlements 6 days a week.

BROMPTON REGIS

SETTING

11.69. The settlement of Brompton Regis lies five miles east of Dulverton on the Brendon Hills. It is surrounded by rolling farmland with wooded valleys to the south and west and views across to Haddon Hill. The village is served by a network of single track roads leading off to the B3190 and B3224. The road from Heathpoult Cross to Machine Cross, less than a mile to the west, is also part of the local freight route that links with the B3224 and B3190. Wimbleball Lake lies two miles to the east and is a key visitor attraction for the area.

BUILT ENVIRONMENT

11.70. Much of the historic core of Brompton Regis is clustered around the listed Grade II* parish church of St Mary. These older buildings are cottages built of rendered stone which would formerly have been lime-washed and roofed in local slate.

11.71. More modern housing development such as Brompton Meadows and Haddon Close has taken place along the main approach roads to the village.

LOCAL SERVICES

11.72. The area of open land to the south of the George Inn is an important feature and amenity area for the community. Key community facilities are the public house and the village hall which also hosts the village shop and once a week the mobile Post Office. The former Post Office and Village Shop discontinued trading in 2008 due to the round of Post Office closures and now operates as a B&B.

11.73. There is no regular daily bus service calling at Brompton Regis. A single bus service runs from Dulverton to Minehead via Brompton Regis, once a week. Brompton Parish Lifts is a community car scheme that provides a valuable transport service for those unable to access private transport.



Sanctuary Cottage and The Old Post Office, Brompton Regis

CHALLACOMBE

SETTING

11.74. Challacombe lies in the shallow valley of the upper reaches of the Bray River, surrounded by permanent pasture which extends out to high moorland. It is accessed via the B3358 which is one of the main transport routes that pass through the National Park. Several properties that are sited close to the minor road following the river are within an area at risk of flooding. A local wildlife site also adjoins the settlement to the rear of Home Place on Barton Plantation fields.

BUILT ENVIRONMENT

11.75. The dispersed pattern of the settlement includes buildings each side of the B3358 along Bickfont Hill to Barton Gate, and those extending along the river valley towards Challacombe Bridge. Many of the buildings in the village are traditional cottages with rendered stone or cob walls with slate roofs. The historic core of the village includes much of the built development within the valley setting; the footbridge near Town Farm is a grade II listed structure and is the only listing within the main settlement. More modern development has been limited and includes some post-war terraced housing at the top of Bickfont Hill and some detached residences close to the main settlement grouping.

11.76. The church, a farm and two cottages are located at Barton Town which is over a mile away from the main settlement close to the National Park boundary.



The ford at Challacombe

LOCAL SERVICES

11.77. The main community services in the village are the Post Office & Stores and the Black Venus Inn. The local economy is dependant on farming and tourism with a number of holiday lets (one including a health spa) and a small camp site in the village.

11.78. There is no bus service for Challacombe. The nearest access point for a bus service is over two miles away at Friendship Cross. There is a ring and ride community transport scheme available for residents which do have access to private transport.

CUTCOMBE & WHEDDON CROSS

SETTING

- 11.79. Cutcombe and Wheddon Cross are the settlements in the parish of Cutcombe. Due to their proximity they are generally considered to be one settlement and are identified as such for the Local Plan.
- 11.80. The village lies within a farmed landscape of permanent pasture land enclosed by hedgebanks. The landscape setting of the settlements is strongly influenced by the incised wooded valleys surrounding the settlement, and the open moorland of Dunkery Hill. At a height of approximately 300 metres, the settlement is very prominent in the landscape and is visible from several miles away, including from Dunkery Beacon.

BUILT ENVIRONMENT

- 11.81. The historic core of the settlement centres on the Grade II* St John's Church and Codecombe House in Cutcombe, whilst older properties in Wheddon Cross have developed around the crossroads of the A396 and B3224. The main traffic problem experienced is congestion around the crossroads particularly in relation to where the roads narrow between buildings which immediately front the road. Congestion most frequently occurs during the peak tourist season due to the volume of traffic experienced on the main transport routes, and when large vehicles meet.
- 11.82. There has been considerable post-war development in both Cutcombe and Wheddon Cross. A development of 25 new homes on the former Livestock Market site included 12 affordable homes to meet local housing need.

LOCAL SERVICES

- 11.83. For a village of this size, there is a relatively wide range of facilities and services including Cutcombe First School, the petrol station with a shop and Post Office, recreation facilities, pub, and the Moorland Hall. There is a regular bus service that runs 6 days a week between Minehead and Tiverton.
- 11.84. Agriculture is an important part of the local economy and character of the parish, with a local livestock market at the centre of Wheddon Cross which is important both locally and for the farming community of the National Park. There are a number of businesses within the village that serve the local community and tourists. Many of the businesses, including light industry, provide a range of employment opportunities for people in the local area. Recent business opportunities have been provided through the development of business units as part of the redevelopment of the livestock market.

POTENTIAL COMMUNITY PROJECT

- 11.85. Cutcombe First School occupies a particularly restricted site. Traffic hazard problems exist and there are staff parking difficulties. It is proposed that part of the adjacent field is safeguarded to extend the school site in due course. The school also requires land for playing field use.

ES-D2 CUTCOMBE & WHEDDON CROSS COMMUNITY SAFEGUARDING AREA

Land to the North of Cutcombe First School, as shown on Inset Map 10, is allocated for an extension to the school site and school playing field.

EXFORD

SETTING

- 11.86. Exford is located in the centre of the National Park and lies on the B3224, one of the main tourist routes through Exmoor. The settlement is located on a crossing of the River Exe where the valley widens and tributary streams join the river. There are a few residential and business premises lying close to the river that are within an area of flood risk.
- 11.87. The village green is the main recreation and amenity area in Exford that is popular with the community and visitors alike, providing an open setting in the centre of the village.

BUILT ENVIRONMENT

- 11.88. Exford has two distinct focal points, the village green and the bridge, and much of the historic settlement is centred on these features. Many of the buildings in the centre of the village are traditional cottages of stone or rendered stone walls roofed with slate or thatch.
- 11.89. Post-war development has generally taken place along the approach roads of Church Hill and Park Street. A development of 9 homes to meet local affordable housing need at Westcott Mead, was completed in 2009 and is located at the top of Church Hill.

LOCAL SERVICES

- 11.90. Exford has a number of community services and facilities and still retains a separate Post Office which together with the Exmoor Stores are two of the main community services in the village. Other facilities include Exford First School, the memorial hall, two pubs (within the hotels), the social club, the cricket ground, and the church.



Park Street, Exford

- 11.91. Although tourism is important to the local economy, the village also provides jobs in other sectors, including farming, hunting and game shooting. There are a variety of local businesses in the village which provide employment in the local area including hotels, motor vehicle repair garages, and a livery yard.
- 11.92. Exford has a limited regular bus service. The Minehead to Tiverton service runs daily from Monday to Saturday and serves Exford twice in each direction to Minehead.

LUXBOROUGH

SETTING

- 11.93. Luxborough lies in a deep valley in the Brendon Hills, accessed by a network of narrow lanes leading off the A39, A396 and B3224. The landscape character is defined by wooded and farmed hills with the main area of settlement nestled in the valley bottom.
- 11.94. Although regarded as one community, the settlement of Luxborough comprises of three separate hamlets: Churchtown, Kingsbridge and Pooltown.
- a) Churchtown is a collection of farms and cottages centred on St Mary's Church.
 - b) Kingsbridge is within the valley of the Washford River and includes a number of small cottages, The Royal Oak Inn and the village hall.
 - c) Pooltown is a small cluster of cottages and farms along the valley from Kingsbridge.

BUILT ENVIRONMENT

- 11.95. Many of the older cottages in Luxborough are built of local rubble stone – some exposed stone walls and others pink or white stone and render, roofed in Treborough slate or thatch. These materials reflect the local geology and provide a locally distinctive village character. The main settlement of Kingsbridge experienced a significant level of new housing during the 1980s and 1990s, and a small development of affordable homes was built in Pooltown during this period.



Cottages at Pooltown, Luxborough

LOCAL SERVICES

- 11.96. One of the most important features of Luxborough is the area of open land between Kingsbridge and Pooltown. This land is used for informal recreation, and provides views into and out of the two hamlets, as well as maintaining open space between them. The key community facilities are the Royal Oak Inn, the village hall and recreation area which are in Kingsbridge; and the church at Churchtown.
- 11.97. With several farms in the parish, agriculture is important to the local economy. Game-shooting is also an important local business, particularly through the autumn/winter months and is a popular form of farm and forestry diversification.
- 11.98. There are limited bus services to the village with a service running on Mondays and Fridays from Luxborough (Kingsbridge) to Minehead.

MONKSILVER

SETTING

- 11.99. Monksilver lies on the very eastern edge of Exmoor National Park. The National Park boundary splits both the parish and the village along the B3188. For planning purposes, therefore, part of Monksilver village lies within the National Park and part within West Somerset District Council's area.
- 11.100. Monksilver lies at the foot of the Brendon Hills within an area of predominantly arable land and permanent pasture. Front Street is adjacent to the stream that flows through the settlement; as a result a number of properties are within an area at risk of flooding.



Wayside Cottage, High Street, Monksilver

BUILT ENVIRONMENT

- 11.101. The village is small and the buildings are tightly knit, characterised by colour-washed, thatch or slate cottages. There are several listed buildings including the Grade I Church of All Saints and the Grade II Notley Arms and its 19th century outbuildings, which were formerly the stables and have planning consent to convert to ancillary visitor accommodation.
- 11.102. There has been some small-scale post-war development that includes housing at Pond Orchard and Sunny Bank to the north of the church.

LOCAL SERVICES

- 11.103. The Notley Arms public house, the church and village hall are the main community facilities in Monksilver. The EMN (Elworthy, Monksilver and Nettlecombe) Hall is located just outside the National Park boundary and is a well-used modern facility for the three neighbouring parishes of Elworthy, Monksilver and Nettlecombe and a popular venue for artists and musicians.
- 11.104. There are no bus services in Monksilver. There are however, community transport and demand responsive transport schemes that serve the Monksilver area.

PARRACOMBE

SETTING

- 11.105. The settlement of Parracombe includes the hamlets of Bodley, Prisonford and Churchtown that together with the main village are considered as one community. Parracombe is within the North Devon area of the National Park and is bypassed by the A39 main tourist route. It lies in the upper Heddon Valley within a landscape characterised by small and medium sized fields enclosed by hedgerows.
- 11.106. The Scheduled Ancient Monument of Holwell Castle to the south of the village is a striking local landmark consisting of the earthworks of a motte and bailey of medieval origins⁴⁸³. The site and the surrounding area is also a local wildlife site. The dismantled railway line of the Lynton and Barnstaple Railway that closed in 1935 is identified on the Historic Environment Record. The former route passes through the village at Prisonford (see policies CPx Safeguarding Former Railways and CPx Reinstatement of the Lynton & Barnstaple Railway).
- 11.107. The valley bottom and land along the Heddon River and its tributaries are at risk from flooding; the 1952 and 1960 floods caused considerable flood damage in the village. There are a number of properties within areas at greater risk from flooding, particularly those close to Parracombe Bridge.

BUILT ENVIRONMENT

- 11.108. Distinctive features of Parracombe include the steep roads and narrow, twisting lanes together with the high density of the buildings around Parracombe Bridge and along Parracombe Lane. A conservation area was designated for the whole of Parracombe in 1997. This area includes a number of listed buildings and structures including the Grade I listed 12th century St Petrock's Church.
- 11.109. Post-war development has taken place at various locations in the village including detached dwellings along the lane at Pencombe Rocks, Bodley Lane and the area around Prisonford and Churchtown. Some small terraces of former local authority housing were also developed along Bodley Lane. There has been no further development of local affordable housing since this time.

LOCAL SERVICES

- 11.110. Within the village there are a number of community facilities such as the primary school (part of the West Exmoor Federation together with Lynton and Kentisbury primary schools), Village Stores and Post Office, the Coronation Playing Field, the village hall and the Fox & Goose Inn.
- 11.111. The village is well-served by public transport. The main daily service from Barnstaple to Lynton and Lynmouth stops at Heddon Bridge with more than 5 services per day. The Lynmouth to Ilfracombe service is a daily seasonal service that also stops in Parracombe (April to October).
- 11.112. There are occasional traffic problems either through speed or congestion due to the narrow lanes. A 20mph speed restriction is in place from the lower end of Leys Lane through to Parracombe Lane.

⁴⁸³ Exmoor National Park Historic Environment Record

ROADWATER

SETTING

- 11.113. Roadwater lies in the narrow valley of the Washford River, along the road linking the neighbouring village of Luxborough with the A39 at Washford. The landscape setting has influenced the strong linear pattern of the village, with buildings situated each side of the road for nearly a mile.
- 11.114. As the settlement is nestled in the valley bottom, a considerable number of properties are located within an area at risk of flooding. Harpers Wood is a local wildlife site that lies adjacent to the recreation ground.

BUILT ENVIRONMENT

- 11.115. The use of building materials reflects the underlying geology with exposed red sandstone, pink and white painted stone and render, and slate roofs. The southern end of the settlement contains the main grouping of traditional buildings that typify the use of local materials.
- 11.116. One of the key characteristics of Roadwater is the former West Somerset Mineral Railway, dating from the 19th century. Many buildings and features associated with the railway and dating from this era remain intact, including the old Roadwater station and the Methodist Church, and are important to the cultural identity of the village. Other buildings such as forges, mills and farm buildings connected with other long standing industries are also significant to the overall character of Roadwater.
- 11.117. Post war development, including buildings at the northern end of the village, tends not to have been built in a distinctive local style. However, one of the most recent residential developments, built at the end of the 1990s at Watersmeet Close on the Old Nurseries site, used locally distinctive materials including natural stone walls and slate roofs.
- 11.118. A significant issue raised by the local community concerns the degradation of Roadwater's appearance and character through the cumulative impact of the loss characteristic boundary features and garden space, to accommodate off-street parking. Particular consideration will be given to the conservation or enhancement of such boundary features and private amenity space in determining planning proposals likely to affect the coherence and character of the streetscape.

LOCAL SERVICES

- 11.119. Roadwater is one of the few villages on Exmoor which still has a petrol filling station and garage. Other community services include the Post Office & Village Stores, village hall, a pub and the recreation ground. There is also some light industry which includes the Singer Instruments factory located in the centre of the village, which has recently extended its premises.
- 11.120. The village is served by a limited bus service that runs twice a week from Roadwater to Minehead.

SIMONSBATH

SETTING

- 11.121. Simonsbath is the most isolated settlement in the National Park located on the junction of the B3223 and B3358 at a crossing of the River Barle and is surrounded by high moorland. The main character of Simonsbath lies in its open nature and the views out to the surrounding landscape.
- 11.122. The landscape and built character of the parish was greatly influenced by the Knight family during the 19th century through a programme of draining, ploughing and fertilising to improve the moorland soils on a large scale. The Knight family built a number of farms in the parish and introduced new working practices.
- 11.123. The River Barle and the adjoining flood plain areas are designated as a SSSI as the river is of very high quality and has hardly been modified at all by pollution, water abstraction or river engineering. Although Simonsbath lies in a valley setting, no properties are within areas at risk of flooding. Birch Cleave woods are a prominent landscape feature and provides a sense of enclosure to the settlement – this woodland is protected by a Tree Preservation Order. Ashcombe Plantation to the north of Simonsbath is a local wildlife site and an important designed landscape formerly associated with Simonsbath House.

BUILT ENVIRONMENT

- 11.124. A small group of buildings form the central core of the settlement although the pattern of the settlement is generally dispersed along the main approach roads. The 17th century Grade II listed Simonsbath House Hotel is the most dominant building in the village. The Simonsbath Sawmill, owned by the National Park Authority, was renovated with the support of Heritage Lottery funding, including reinstatement of the leat and weir.
- 11.125. Many of the dwellings were built for farm workers to manage the Knight estate and subsequently the Fortescue estate. Subsequent ownership of the estate has resulted in some fragmentation with several properties becoming privately owned rather than tied-housing. There has been very little modern development in the settlement and has generally occurred as infill.

LOCAL SERVICES

- 11.126. The village is a popular base for walking and touring and tourism is one of the mainstays of the local economy. Businesses in the village include the Simonsbath House Hotel and outdoor recreation centre, Exmoor Forest Inn and hotel, Boevey's tearooms and a small shop (formerly a pottery).
- 11.127. There are no regular bus services passing through the village, but demand responsive community transport is available from Monday to Saturday for those without access to other forms of transport.

TIMBERSCOMBE

SETTING

- 11.128. Timberscombe is compact in form, situated either side of the Timberscombe Stream at the head of the Avill valley and includes the hamlet of Cowbridge to the east. The settlement lies within the landscape character area of the Farmed and Settled Vale but its setting is also strongly influenced by the surrounding Plantation Hills to the north and east, and the farmed and wooded Brendon Hills to the south.
- 11.129. Some properties within the centre of the village where the valley widens are located in an area at risk of flooding

BUILT ENVIRONMENT

- 11.130. The central area of the village has complex, narrow street pattern, part of which was formerly the main route through the village. These streets are fronted by the tightly packed houses of the historic village centre around the Grade I listed Church of St Petrock. The traditional buildings in Timberscombe are built of local red sandstone with Treborough slate roofs.
- 11.131. There has been a significant level of post-war housing development that has expanded the settlement, but retained its nucleated pattern. The most recent housing was developed in the 1980s that included 18 affordable homes for rent at Vicarage Close. The level of development since this time has been relatively minor.
- 11.132. A short by-pass was constructed in the 1980s to improve traffic flow through the village on the A396, one of the main tourist routes through Exmoor.

LOCAL SERVICES

- 11.133. Timberscombe has several local facilities including: Timberscombe First School, Post Office, church, chapel, village hall and pub. The majority of the local economy is based on agriculture and tourism with a number of self-catering holiday lets and complexes within the settlement including Duddings and Knowle Manor. The play area, playing field and cricket ground are important recreation areas for the village.
- 11.134. As Timberscombe is located on one of the main routes (A396) through the National Park, there are a number of buses which serve the village; the main daily service is between Minehead and Tiverton.

TIMBERSCOMBE COMMUNITY LED PARISH PLAN

- 11.135. A parish plan has been published following extensive engagement with parishioners to help shape the long term future for the parish. The parish plan includes an Action Plan to help address issues highlighted through consultation. Actions that are related to planning and land-use include the future provision of parking in the village, protecting local services such as the Post Office, provision of a village shop, and ensuring suitable housing provision. Addressing street lighting and allotment provision are also actions raised that reflect those issues raised through the Your Future Exmoor consultation.

WINSFORD

SETTING

- 11.136. Winsford, in common with many Exmoor villages has a wooded valley setting and originates from an ancient river crossing, where the Winn Brook meets the River Exe. The settlement has developed from the historic core along the converging lanes that creates a spacious character. The settlement is situated off the main road network just a mile and a half west of the A396.
- 11.137. Similar to other settlements that have a valley setting, there are a number of properties within an area at risk of flooding, particularly those that lie adjacent to the River Exe and Winn Brook. Berry Cleeve Wood is a local wildlife site and important upland oak habitat that lies close to the village and strongly influences the landscape setting of the village.

BUILT ENVIRONMENT

- 11.138. The character of the historic centre of the settlement has remained largely unaltered, and includes groups of stone or rendered cottages, roofed with thatch or slate centred on the river crossings including a number of stone bridges and the ford. There are several listed buildings in the village including the Grade I Church of St Mary Magdalene. Recent enhancement projects in the village include the bridge to the village green, extension and refurbishment of the village hall, and enhancement of the area around the war memorial.
- 11.139. Post-war development has generally occurred along the radial routes that converge in the village centre with some infill. The most recent significant development was the construction of six affordable homes at Darby's Knap in the 1990s, on the edge of the village adjacent to Edbrooke Road. Some further local affordable homes more have recently been provided along Ash Lane by Caractacus, a local housing charity.

LOCAL SERVICES

- 11.140. The village has a number of community services and facilities which include the village hall, Post Office and village shop, pub, vehicle repair garage and church. The village school closed in 1995, and subsequently became the Exmoor Community Computer Centre; permission has recently been granted to allow the change of use to a local needs affordable dwelling. There are also several open spaces in Winsford important for recreation such as the village green, tennis courts and the sports field.
- 11.141. Winsford is a popular destination for visitors with tourism sector being particularly significant for the local economy - businesses in the village include tearooms, hotels and B&B establishments.
- 11.142. There is limited public transport serving the village. The Minehead to Tiverton bus service operates Monday to Saturday, which enables residents to travel to Minehead. However, this service only extends to Winsford twice a day.

WITHYPOOL

SETTING

- 11.143. Withypool is situated in the Barle Valley a mile west of the B3223. It has a remote upland character with enclosed farmland on the valley sides extending out to the south and west to the open moorland of Withypool Common.
- 11.144. Although the settlement has developed around the crossing of the River Barle, there are only a few properties within areas of high flood risk and are those located close to New Bridge and at the confluence of Pennycombe Water and the River Barle along Sparrow Lane. The River Barle is a SSSI and Withypool Common is part of the Exmoor Heaths Special Area of Conservation which is a European wildlife designation in addition to a SSSI designation. The land to the east of Fir Tree farm is a local wildlife site.

BUILT ENVIRONMENT

- 11.145. Traditional buildings are generally stone and render walls with slate roofs and are grouped to the north of the river, closely following the contours of the hillside. Post war development has generally occurred to the south of the river and on infill sites within the village. Affordable housing provision has extended up the hill past Fir Tree Farm to the edge of Withypool Common. The area between the car park and the River Barle is an important amenity area for visitors to Withypool.



Withypool cottages and the River Barle

LOCAL SERVICES

- 11.146. Local community services and facilities in Withypool include the Post Office and Shop, church and village hall. The tearoom and The Royal Oak Inn are examples of businesses in the village which cater for visitors as well as the local population.
- 11.147. There are no regular bus services passing through the village, but the West Somerset SLINKY demand responsive bus service is available from Monday to Saturday.

WOOTTON COURTENAY

SETTING

- 11.148. Wootton Courtenay is situated on the lower slopes of Wootton Common, with a south facing aspect overlooking the Avill valley which runs towards Dunkery Beacon. The settlement lies within the high vale character area of the farmed and settled vale landscape and is particularly characterised by the undulating landform and small fields bounded by hedgerows. A number of narrow winding lanes connect the village to the main A39 and A396 routes lying to the north and south of the settlement.
- 11.149. The lower part of the village has a few properties within an area at greater risk of flooding.

BUILT ENVIRONMENT

- 11.150. The older, historic centre of the settlement has a diverse pattern of informal building groups including some main groupings around the Grade I listed All Saints Church at the main village centre, and the lower village around the stream crossing Wootton Courtenay. This central part of the village was designated a Conservation Area in December 1994 and includes most of the 19th century and earlier settlement. There are a number of listed buildings and structures within the conservation area including the grade I listed Church of All Saints that dates from the 13th century.
- 11.151. The traditional building forms are natural stone, render, slate and thatch cottages fronting narrow lanes with natural stone paving and cobbled areas. Another important local feature is the high red sandstone boundary walls that provide a sense of enclosure to the historic settlement core. More recent development is generally lower density consisting of detached dwellings within large curtilages along the approach roads. This form of ribbon development has created a more linear settlement form.



The Old Rectory at the centre of Wootton Courtenay

LOCAL SERVICES

- 11.152. Community services and facilities in the village include: The Villagers Shop and Post Office, village hall, church and recreation ground. There are a few local businesses in and around Wootton Courtenay, including: the vehicle repair garage, and the Dunkery Beacon Hotel.
- 11.153. Wootton Courtenay has one bus service which runs once a week to Minehead, serving the villages of Luccombe, Wootton Courtenay and Dunster.

RURAL COMMUNITIES

ALLERFORD

SETTING

- 11.154. Allerford is the largest settlement in the parish of Selworthy & Minehead Without and is situated within the Vale of Porlock, close to the A39 and a mile to the east of Porlock. To the north and east of the village are the steep wooded slopes of Allerford Plantation flanking Bossington Hill.
- 11.155. Allerford is within the Holnicote Estate, formerly the Exmoor seat of the historic of the Acland family and now in the ownership of the National Trust. The relatively low-lying, level topography means that the majority of the settlement and surrounding land is within an area at risk of flooding⁴⁸⁴ and also lies within a groundwater protection zone. The area of flood risk severely limits the potential for new development in the settlement.

BUILT ENVIRONMENT

- 11.156. Allerford has a linear form with buildings fronting the narrow road that passes through the village towards Bossington. The majority of cottages are roofed in natural slate or Bridgwater tiles, and walls are either exposed stone rubble or lime render. A local authority housing development was added to the western edge of the settlement in the 1930s; however there has been very little development since this date. There are also several orchards within and adjoining the village which are mainly remnants of much larger expanses that existed up to the first part of the 20th century.
- 11.157. A conservation area was designated in 1984 and takes in the 19th century boundary of the original settlement including the small community of Brandish Street. A considerable number of cottages within the conservation area date from the 16th and 17th century, and display characteristic local vernacular features. The medieval packhorse bridge is a characteristic feature of Allerford; it is Grade II* listed and a scheduled ancient monument. Very limited new development has taken place in recent years.

LOCAL SERVICES

- 11.158. Allerford has the main community services in the parish which include the village hall, shop & Post Office and Allerford Club & Reading Room. The local economy is based around agriculture and tourism with the Rural Life Museum and Victorian School open to the public, and the operational blacksmith's forge.
- 11.159. There is a daily bus service to Porlock and Minehead which can be accessed on the A39 at Allerford Turn. Some services also run via Allerford to Bossington Green.

PORLOCK VALE PARISH PLAN

- 11.160. The Porlock Vale Parish Plan "Shaping Our Future" was published following extensive community consultation and includes the parishes of Porlock and Selworthy & Minehead Without. This plan identified a wide range of issues that were reviewed to inform a series of actions defined as Priority 1 or 2. Priorities that are linked to planning and land use included more affordable homes for local families, improved footpath access and cycle route creation.

⁴⁸⁴ Flood zone 3 – an area with a 1% (1 in 100) or greater chance of flooding each year

COUNTISBURY

SETTING

11.161. Countisbury is situated on Countisbury Hill approximately 1 ½ miles east of Lynton & Lynmouth in the parish of Countisbury. The settlement is split by the main A39 tourist route through Exmoor which is particularly busy through the main summer months. Countisbury lies close to the high coastal heaths and rights of way network, including the South West Coast Path.

BUILT ENVIRONMENT

11.162. There are very few houses in the settlement, and most of the parish population⁴⁸⁵ (66 in 2001 census) are located on outlying farmsteads. The settlement is dominated by the Blue Ball Inn and the associated car park on the opposite side of the main road. The Grade II* listed Church of St John the Baptist is an 18th/19th century rebuilding of an earlier church and is set back from the main road.

LOCAL SERVICES

11.163. The church is set back from the main road and the Blue Ball Inn which lies directly south of the A39 with the car park on the opposite side of the road.

11.164. The resident population will rely on the close proximity of neighbouring town, Lynton & Lynmouth, as many community services and facilities are within a reasonable distance. Due to this proximity and the location on the main A39 this settlement is very accessible. Public transport provision is year round with more frequent bus services during the main tourist season.



The Blue Ball Inn – Countisbury

⁴⁸⁵ Countisbury is a separate parish, but joins with neighbouring parish Brendon to share parish council responsibilities. Consultation took place in December 2011 for a proposed merger between Brendon & Countisbury to become a single civil parish.

HAWKRIDGE

SETTING

11.165. Hawkridge is a small isolated moorland settlement in the parish of Withypool & Hawkridge, accessed by single track narrow lanes four miles south of Withypool. The settlement has a community of just over 40 people (including outlying farmsteads). The settlement lies on a ridge of land within the Enclosed Farmed Hills with Commons landscape character type which is significantly influenced by the Incised Wooded Valleys of the Barle landscape directly to the north and south of Hawkridge.

BUILT ENVIRONMENT

- 11.166. There are a few cottages and the farmsteads East Hollowcombe and West Hollowcombe are directly associated with the settlement
- 11.167. St Giles Church is a Grade II* listed building, with a Norman south doorway and 14th century chancel and tower⁴⁸⁶; the building was restored in 1878. The village hall was built in 1938⁴⁸⁷ and has a small car park.

LOCAL SERVICES

- 11.168. St Giles Church and the village hall are the main community services; the hall is used for parish council meetings and community events. There is also a small workshop where antlers are mounted or worked into objects for sale.
- 11.169. The Hawkridge Revel and Gymkhana is held every August Bank Holiday, and continues to be a popular event for the wider Exmoor community. There is a strong sense of community in Hawkridge with events held in the village hall to engage both local people and those in the surrounding area. A community website provides information about the settlement and events for both local people and those who wish to visit Hawkridge.



Broad Lane - Hawkridge

⁴⁸⁶ Heritage Gateway website: <http://www.heritagegateway.org.uk/gateway/>

⁴⁸⁷ <http://discoverhawkridgeexmoor.com>

HEASLEY MILL

SETTING

11.170. Heasley Mill is located in the parish of North Molton and lies on the southern boundary of the National Park within the Incised Wooded Valleys of the River Mole landscape character area, which is characterised by its mix of farmland and woodland, particularly the coniferous plantation of Long Wood. The majority of the settlement is within the National Park; however a few of the dwellings to the south of the settlement lie within the area North Devon Council is responsible for in terms of planning. The eastern edge of the settlement lies within an area at risk of flooding.

BUILT ENVIRONMENT

11.171. The settlement was strongly associated with mining during the 19th century, although its name derives from an ancient mill – a four-storey woollen mill was also built in the late 18th century but was later demolished⁴⁸⁸. Today farming continues to have a strong community association, and more recently game-bird shooting.

11.172. The settlement is characterised by a number of stone and white rendered properties with slate roofs. Heasley House Hotel is situated in the centre of the settlement with a number of dwellings clustered around the cross roads. The old Methodist Chapel was redundant for a number of years, and has been granted permission to change the use to provide a local need affordable home.

LOCAL SERVICES

11.173. Heasley Mill still has a village hall (formerly the old school) with a substantial car park. There are a number of events held in the village hall throughout the year, and the annual fete and duck race is held during the summer.



Heasley Mill

⁴⁸⁸ http://commons.wikimedia.org/wiki/File:North_Molton,_Heasley_Mill_-_geograph.org.uk_-_248827.jpg

KENTISBURY

SETTING

- 11.174. Kentisbury Parish is partly within the North Devon area of the National Park. There are three distinct settlement groupings that form a dispersed settlement pattern within the parish at:
- Kentisbury (split by the National Park boundary),
 - Kentisbury Ford and
 - Patchole.
- 11.175. The settlement at Kentisbury consists of The Barton farm complex, the church and a small number of cottages to the west of the National Park boundary. The primary school and village hall lie a short distance to the south towards Kentisbury Ford.
- 11.176. The area of settlement within the National Park lies within the northern area of the Enclosed Farmed Hills with Commons landscape character type which is characterised by permanent pasture enclosed predominantly by beech hedge banks.



Kentisbury – view to The Barton and Church of St Thomas

BUILT ENVIRONMENT

- 11.177. The Church of St Thomas is a Grade II* listed building with 6 gravestones which are Grade II. The Barton or Kentisbury Barton is a farm complex that lies directly adjacent to the church and includes the Grade II listed farmhouse. The farm was previously owned by Devon County Council and leased as two tenancies until it was sold as a whole in 2010 to one of the existing tenants⁴⁸⁹.

LOCAL SERVICES

- 11.178. There are a number of local services and facilities including the church at Kentisbury (within the National Park), shop and Post Office situated by a vehicle repair garage slightly north of Kentisbury Ford, and the village hall and primary school located between Kentisbury and Kentisbury Ford.

⁴⁸⁹<http://www.devon.gov.uk/loadtrimdocument?url=&filename=CX/09/93.CMR&rn=10/WD2071&dg=Public>

LUCCOMBE

SETTING

- 11.179. The settlement of Luccombe is a small, linear village lying in a wooded valley at the foot of Luccombe Hill below Dunkery Beacon. The local landscape character is influenced by the distinctive landform variation of a series of interconnected rounded hills or knolls. The surrounding woodland combined with veteran hedgerow trees and in-field trees and small pockets of orchard make for a well-treed landscape character.
- 11.180. Local wildlife sites surround the village, including Luccombe Plantation and the Holnicote Estate. The National Trust has owned the Holnicote Estate since 1944 and this includes a number of dwellings in the village.
- 11.181. Luccombe can only be reached by a series of winding single track lanes; this and its setting contribute to its sense of remoteness although the village is only three miles from Porlock, four miles from Minehead and just over a mile from the A39 main tourist route.

BUILT ENVIRONMENT

- 11.182. Luccombe is a good example of a traditional village and is typical of other settlements in the Vale of Porlock. Cottages and farm groups mainly dating from the 17th century lie along the two main streets. Many are lime-washed with thatched roofs and retain traditional vernacular detailing.
- 11.183. A conservation area was designated in 1984 which includes most of the village. Within the conservation area are 17 listed buildings, all of which are Grade II except the Grade I Parish Church and the Grade II* remains of the churchyard cross. The village green, high stone boundary walls and the leat adjoining the lanes are important features contributing to the character of the village.
- 11.184. Some modern infill developments have taken place within the settlement and are generally detached dwellings within sizeable curtilages. A small local affordable housing scheme completed during the 1990s successfully reflects the local vernacular.

LOCAL SERVICES

- 11.185. The village hall and Parish Church are the only community facilities within Luccombe. There is a limited bus service to Minehead which runs once a week serving Luccombe, Wootton Courtenay and Dunster.



Cottages fronting Stoney Lane in Luccombe

MARTINHOE

SETTING

11.186. Martinhoe is a small settlement within the parish of Martinhoe, wholly in the North Devon area of the National Park. It is accessed by single track narrow lanes off the main A39, approximately 4 miles west of Lynton. The settlement lies within the landscape character area of the Enclosed Farmed Hills with Commons – the northern area is strongly influenced by its proximity to Exmoor's coastline with views along the coast and out to sea.



Church of St Martin - Martinhoe

BUILT ENVIRONMENT

11.187. The settlement consists of a number of cottages, Town Farm which has several traditional buildings, and the Old Rectory Hotel and self-catering cottages. The parish is sparsely populated with only 57 occupied households in the 2011 census – although there were only 87 dwellings in the parish a high percentage of these were second/holiday homes 34.5% - almost double the National Park average of around 19%.

LOCAL SERVICES

11.188. Community facilities include the church and Hannington Hall (a community meeting room). The settlement has no bus service or mobile library, and residents are mainly reliant on Lynton & Lynmouth for local services. A ring and ride community transport scheme also extends to the parish.

OARE / MALMSMEAD

SETTING

- 11.189. Oare is a small dispersed settlement of farmsteads and individual dwellings within the parish of Oare and the closely associated building group at Malmsmead on the edge of Brendon & Countisbury parish are wholly within the National Park. The settlement is located on small single track roads, set in a deep valley south of the main A39 – these roads are well-used by tourists in the summer as the area is popular for walking, and its association with the novel Lorna Doone by R.D Blackmore has increased the particular interest in this valley community.
- 11.190. The settlement lies within the High Wooded Coast, Combes and Cleave landscape character type which is defined by deeply incised narrow combe valleys and dense woodland. Oare and Malmsmead are within the Lyn landscape character area where the land use and cover are more varied being both wooded and farmed with the moorland fringe evident.

BUILT ENVIRONMENT

- 11.191. Although Oare is dispersed along the valley bottom between Oareford and Malmsmead, there are two main settlement clusters: one is predominantly around the historic core of St Mary's Church and Oare Manor, with Oare Bridge, Oare House and the Rectory directly to the north, and another cluster at Malmsmead with a group of buildings incorporating the old village hall/field centre, Oaremead and the Old Rectory on the opposite side of Oare Water to Malmsmead.
- 11.192. There are a number of listed buildings in the settlement including the church (Grade II*) and Lorna Doone Farm and Farmhouse, Oare Bridge and Malmsmead Bridge which are Grade II. Both bridges are also scheduled monuments.



Malmsmead Bridge and Ford with Lorna Doone Farm in the background

LOCAL SERVICES

- 11.193. There is a shop and tea room at Malmsmead which lies in the adjacent parish of Brendon; however its location implies a stronger link with the community of Oare. A demand responsive transport service is available to serve residents that cannot access other forms of transport.

SELWORTHY

SETTING

- 11.194. The settlement of Selworthy lies within Selworthy & Minehead Without parish within the West Somerset area of the National Park. This historic settlement is part of the Holnicote Estate and a number of the properties and majority of the surrounding land is owned by the National Trust; however there are a few properties and plots of land within and adjoining the village which are in private ownership.
- 11.195. Selworthy is within the landscape low-lying, undulating character area of the Farmed and Settled Vale, situated on the contrasting areas of the high vale that form the foothills to the more elevated and pronounced High Wooded Coast, Combes and Cleaves landscape character type immediately to the north.

BUILT ENVIRONMENT

- 11.196. A Conservation Area which includes the entire 19th century boundary of the settlement was designated in 1984 and includes 19 listed buildings and structures and the historic farmstead of Selworthy Farm.
- 11.197. Selworthy is a picturesque settlement defined by the informal arrangement of loosely grouped buildings – particularly the group of thatched and cream rendered cottages bordering Selworthy Green and the white-washed Grade I listed church. The setting of Selworthy and its traditional vernacular style of the cottages and the relative absence of modern buildings make this settlement a popular destination for tourists.



Selworthy Green

LOCAL SERVICES

- 11.198. In addition to the church, there is a tearoom and National Trust gift shop within the settlement. Other local services can be accessed at Allerford, Porlock or Minehead. There is a regular daily bus service less than 1km from the settlement to Porlock or Minehead on the A39.

TWITCHEN

SETTING

- 11.199. The settlement of Twitchen is located in the parish of Twitchen partly within the North Devon area of the National Park, around a junction of narrow single track lanes. The settlement is set within the southern landscape character area of the Enclosed Farmed Hills and Commons which is strongly influenced by the open moorland beyond Cussacombe Common to the east.
- 11.200. Twitchen, in common with many other settlements within this landscape character typology is situated away from the areas of highest ground within an adjacent valley.

BUILT ENVIRONMENT

- 11.201. The main settlement core is focussed on the church and old school with the smaller area of Twitchen Mill to the south.
- 11.202. The settlement has the Church of St Peter (Grade II), a small village hall, the farmsteads of Higher House and Lower House and a few cottages. Twitchen Mill Cottage was formerly a chapel with attached manse and is Grade II listed.

LOCAL SERVICES

- 11.203. Apart from the church and village hall, most local services and facilities will be accessed in the nearby village of North Molton which is 4 miles to the west, outside the National Park boundary. There is no public transport serving Twitchen.



Twitchen from Cussacombe Common

WEST PORLOCK

SETTING

- 11.204. West Porlock is small nucleated settlement situated between the settlements of Porlock and Porlock Weir (see separate settlement profiles). West Porlock is located within a narrow band of the Farmed and Settled Vale landscape character type that has a strong visual connection to the surrounding landscapes of the High Wooded Coast, Combes and Cleaves and the Low Farmed Coast and Marsh which lie immediately to the south and north of the settlement.
- 11.205. The woodland to the south and west of the settlement is protected by a tree preservation order (TPO) and the settlement is located within the area designated as Heritage Coast.

BUILT ENVIRONMENT

- 11.206. The settlement is predominantly residential dwellings mostly clustered on the south of side of the B3225 road. The former West Porlock Hotel has recently closed and reverted to a residential property. There are a few heritage assets within the settlement and The Forge complex of buildings are particularly noted as locally important⁴⁹⁰.

LOCAL SERVICES

- 11.207. There is a small village hall associated with the settlement and Porlock Weir that was originally an army building from the First World War. It is located within the woods near Porlockford and was much used in the past for social events, and is currently undergoing refurbishment. Most local services and facilities will be accessed at Porlock with a bus service also linking the settlement to Porlock and Minehead.



West Porlock along B3225

⁴⁹⁰ Features of particular value raised by Porlock Parish Council (April 2013)

WITHYCOMBE

SETTING

- 11.208. Withycombe is located within a parish of the same name on the north eastern edge of the National Park. The National Park boundary passes through the village with only a few residential properties along West Street within the National Park boundary. The main built area of the settlement is within the local planning authority area of West Somerset Council and policies within the West Somerset Council development plan will apply.
- 11.209. The edge of Withycombe within the National Park lies within the landscape character area of the Wooded and Farmed Hills with Combes which is characterised by rolling hillsides with a clear pattern of field enclosure and significant woodland cover.



West Street, Withycombe

BUILT ENVIRONMENT

- 11.210. The settlement is accessed via a narrow single track lane half a mile from the A39. A mill stream runs through the village, and the history of a former corn mill is evident with the properties Old Mill House, Mill House and Withycombe Mill forming a small terrace in Mill Street.
- 11.211. The use of building materials reflects the underlying geology and provides a locally distinctive built character, with exposed red sandstone and white painted stone and render. There are a number of heritage assets within the settlement as a whole including the Grade I Church of St Nicholas (outside the National Park boundary) and Tudor Cottage (Grade II).

LOCAL SERVICES

- 11.212. Local facilities include the church and the memorial hall – other local services can be accessed at Carhampton. A regular bus service stops at Court Place Lane on the A39 within walking distance from Withycombe.

PORLOCK WEIR

SETTING

- 11.213. Porlock Weir is a small coastal community within the parish of Porlock, which lies wholly within the West Somerset area of the National Park. The settlement is accessed via the B3225 road 1.5 miles west of Porlock – this is a no through road, apart from the privately owned Worthy Toll Road that provides an alternative route to the 1:4 Porlock Hill along the A39. The surrounding area is part of the Worthy [Porlock Manor] estate – this pattern of land ownership has had an unbroken succession of estate landlords that dates from Saxon times. This has enabled a conservative approach to land management to be maintained that is not uncommon with large landowners⁴⁹¹.
- 11.214. Porlock Weir is situated within two distinct landscape character types of the Low Farmed Coast and Marsh where the main area of the settlement lies close to the coast and the High Wooded Coast, Combes and Cleaves that includes the higher settlement area along Chapel Lane and out towards Worthy. The shingle ridge along the coast is an important geomorphological feature and is also designated as a Site of Special Scientific Interest.

BUILT ENVIRONMENT

- 11.215. The settlement has ancient origins evolving around the harbour on the Bristol Channel coast, and has in former times been referred to as Porlock Quay. The settlement has operated as a small port for centuries; the present harbour dates from the early-mid 19th century.
- 11.216. A conservation area encompassing the whole settlement, foreshore, surrounding fields, and the small grouping of buildings at Worthy was designated in 1973. The harbour and surrounding buildings such as Pieces of Eight, Bottom Ship, Turkey Island and Gibraltar Cottages, and Lane Head are considered to be of particular value; as are the old lime kilns⁴⁹².

LOCAL SERVICES

- 11.217. The settlement has a range of services and facilities including the church, convenience store, pub and a range of other businesses including shops, cafés and the Anchor Hotel. There is also a public car park and toilets which highlight the significance of tourism to Porlock Weir. The Hut (village hall) at Porlockford is a facility shared between West Porlock and Porlock Weir, being situated almost equidistant between the two settlements.

COASTAL CHANGE

- 11.218. Porlock Weir's coastal location is likely to become a particular issue for certain areas of the settlement in the future, due to the fact that future coastal defence provision will be unlikely to attract public funds, and the retention of defences would potentially impact on the wider coastal area. The North Devon and Somerset Coastal Advisory Group are responsible for producing a Shoreline Management Plan from Anchor Point to Hartland Point. This plan sets out the approach to future coastal management and has proposed that there will be a move towards no active intervention with currently defended areas facing increased risk of flooding and erosion in the medium to long term due to rising sea levels and increased exposure to wave activity⁴⁹³.
- 11.219. It is recommended that measures are put in place to manage the risk of coastal change at Porlock Weir to mitigate the displacement of people and loss of property and facilities. The Somerset Coastal Change Pathfinder project has assisted coastal communities who are most at risk from sea level rise to help them adapt to coastal change. The work undertaken has helped to raise awareness and build resilience in the community in relation to identifying likely risks of increased coastal flooding and future scenarios for the settlement⁴⁹⁴. Properties close to the shore are most at risk from coastal change and further work with the community

⁴⁹¹ Porlock Weir Conservation Area Character Appraisal 2004

⁴⁹² Highlighted by Porlock Parish Council (April 2013)

⁴⁹³ Draft Shoreline Management Plan 2010 Hartland Point to Anchor Head

⁴⁹⁴ Somerset Coastal Change Pathfinder <http://www.somersetcoastalchange.org.uk/>

will be necessary to address options for relocation (Policy CC-S2 Responding to Coastal Change).



Porlock Weir – Turkey Island Cottages

TABLE 11.1 SETTLEMENT SERVICES & FACILITIES OVERVIEW

SETTLEMENT	Parish Population (2001)	Bus (days per week)	Daily bus >5 X a day	Community Transport	Primary / First School	Middle School	Place of Worship	Village/Town Hall	Post Office	Convenience Store	Other retail premises	Public House	Petrol Filling Station	Police Station	Fire Station	Doctors Surgery	Dentist Surgery	Sports/Recreation Area	Children's Play Area	Public Toilets	Public Car Park	Library	Mobile Library	Bank	Information Centre	IT Centre/Facility	Recycling Facility
LOCAL SERVICE CENTRES																											
Dulverton	1408	6	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓
Dunster	585 (817)	6	✓	✓	✓		✓	✓	✓	✓	✓	✓				✓		✓	✓	✓	✓				✓		✓
Porlock	1440 ⁴⁹⁵	6		✓	✓		✓	✓	✓	✓	✓	✓	✓		✓	✓		✓	✓	✓	✓	✓			✓	✓	✓
Lynton & Lynmouth	1441	6	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	✓	✓		✓	✓	✓	✓	✓		✓	✓	✓	
VILLAGES																											
Allerford	477	6	✓	✓				✓	✓	✓		✓						✓	✓	✓	✓						✓
Barbrook	150 ⁴⁹⁶	6	✓	✓			✓	✓		✓			✓														
Brendon	206 ⁴⁹⁷	0		✓			✓	✓				✓						✓	✓	✓	✓						
Bridgetown / Exton	243	6	✓	✓			✓	✓				✓						✓									
Brompton Regis	449	1		✓			✓	✓	✓	✓		✓						✓	✓				✓				✓
Challacombe	141	0	✓				✓		✓	✓		✓											✓				

⁴⁹⁵ Includes the parish of Oare (population 75 in 2001)

⁴⁹⁶ Estimated population based on number of households multiplied by average household number

⁴⁹⁷ Population for Brendon & Countisbury parishes (population of Brendon Parish 159 in 2001)

SETTLEMENT	Parish Population (2001)	Bus (days per week)	Daily bus >5 X a day	Community Transport	Primary / First School	Middle School	Place of Worship	Village/Town Hall	Post Office	Convenience Store	Other retail premises	Public House	Petrol Filling Station	Police Station	Fire Station	Doctors Surgery	Dentist Surgery	Sports/Recreation Area	Children's Play Area	Public Toilets	Public Car Park	Library	Mobile Library	Bank	Information Centre	IT Centre/Facility	Recycling Facility
Cutcombe / Wheddon Cross	361	6	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓					✓	✓	✓	✓		✓				
Exford	405	6	✓	✓	✓		✓	✓	✓	✓	✓	✓						✓	✓	✓	✓		✓				✓
Luxborough	237 ⁴⁹⁸	2	✓	✓			✓	✓				✓						✓	✓		✓		✓				
Monksilver	73 (113)	0	✓	✓			✓	✓				✓											✓				
Parracombe	293	6	✓	✓	✓		✓	✓	✓	✓		✓						✓	✓	✓			✓				
Roadwater	550 (1672)	2	✓	✓			✓	✓	✓	✓		✓	✓					✓	✓	✓			✓				
Simonsbath	156	0	✓	✓			✓				✓	✓								✓	✓						
Timberscombe	402	6	✓	✓	✓		✓	✓	✓			✓						✓	✓				✓				
Winsford	321	6	✓	✓			✓	✓	✓	✓		✓						✓	✓	✓	✓		✓			✓	
Withypool	201	0	✓	✓			✓	✓	✓	✓		✓								✓	✓						
Wootton Courtenay	264	1	✓	✓			✓	✓	✓	✓								✓					✓				

⁴⁹⁸ Population combined with Treborough parish whose population was 42 in 2001.

SETTLEMENT	Parish Population (2001)	Bus (days per week)	Daily bus >5 X a day	Community Transport	Primary / First School	Middle School	Place of Worship	Village/Town Hall	Post Office	Convenience Store	Other retail premises	Public House	Petrol Filling Station	Police Station	Fire Station	Doctors Surgery	Dentist Surgery	Sports/Recreation Area	Children's Play Area	Public Toilets	Public Car Park	Library	Mobile Library	Bank	Information Centre	IT Centre/Facility	Recycling Facility	
RURAL COMMUNITIES																												
Countisbury	66 ⁴⁹⁹	6	✓	✓			✓					✓																
Hawkridge	P ⁵⁰⁰	0	✓	✓			✓	✓																				
Heasley Mill	P	0						✓																				
Martinhoe	159 ⁵⁰¹	0	✓	✓			✓	✓																				
Kentisbury	P	6	✓	✓	✓		✓	✓	✓	✓			✓										✓					
Luccombe	157	1	✓	✓			✓	✓																				
Oare/ Malmsmead	75 ⁵⁰²	0	✓	✓			✓				✓																	
Selworthy	P	6 ₅₀₃	✓	✓			✓				✓									✓	✓							
Twitchen	70 ⁵⁰⁴	0					✓	✓																				

⁴⁹⁹ 2001 Census data only available

⁵⁰⁰ P – means that the population is included as part of the parish population for the larger settlement in the parish e.g. Selworthy & Minehead Without parish population included under Allerford – there is no separate population for Selworthy.

⁵⁰¹ Includes population for Trentishoe parish which was recorded as 42 in the 2001 census

⁵⁰² 2001 Census data only available

⁵⁰³ Within 1km of the bus stop on the A39

⁵⁰⁴ 2001 Census data only available

SETTLEMENT	Parish Population (2001)	Bus (days per week)	Daily bus >5 X a day	Community Transport	Primary / First School	Middle School	Place of Worship	Village/Town Hall	Post Office	Convenience Store	Other retail premises	Public House	Petrol Filling Station	Police Station	Fire Station	Doctors Surgery	Dentist Surgery	Sports/Recreation Area	Children's Play Area	Public Toilets	Public Car Park	Library	Mobile Library	Bank	Information Centre	IT Centre/Facility	Recycling Facility
West Porlock ⁵⁰⁵	P	6		✓				✓																			
Withycombe	299 ⁵⁰⁶	6 27	✓	✓			✓	✓															✓				
Porlock Weir ¹⁹	P	6		✓			✓	✓		✓	✓	✓								✓	✓						

⁵⁰⁵ Porlock Weir and West Porlock share a community meeting place – known as Porlockford Village Hall or The Hut

⁵⁰⁶ Population of the whole parish – only part of the settlement lies within the National Park boundary.

SETTLEMENT ANALYSIS

- 11.220. Some community facilities and services listed in Table 11.1, such as a convenience store and post office are commonly found within a single premises, particularly in the villages. In addition Post Offices also provide some limited banking facilities for certain banks (i.e. cash withdrawal and paying-in services).
- 11.221. Although there are a number of settlements that are not served by a regular public transport– there are alternative options for those without access to other suitable modes of transport to be able to travel. Within the West Somerset area of the National Park, parishes are served by demand responsive transport (The Slinky Bus) pre-booked door to door bus service for people who are unable to access public transport, where public transport is not available and for those without access to other suitable transport for their journey. There are also alternative community car/transport schemes and a shopping bus that also serve some communities within the National Park. Within the North Devon area of the National Park community transport schemes also cover some parishes within the National Park where people are unable to access other forms of transport including public transport to serve their needs. Go North Devon provides transport services to the parish of Kentisbury and the Ilfracombe & District Community Transport Scheme provides a ring and ride service for other parishes including Brendon & Countisbury, Lynton & Lynmouth, Martinhoe, Parracombe and Challacombe.
- 11.222. The recycling facilities within some settlements are supplemented by both North Devon and West Somerset district councils which provide weekly doorstep recycling collections.
- 11.223. The estimated population within the settlements of Barbrook, Dunster, Monksilver and Roadwater are based on approximate number of households within the settlement (within the National Park boundary) multiplied by the average household occupancy for the whole parish.
- 11.224. Table 11.2 provides a summary of the overall capacity each settlement has for additional small scale housing developments over the long term based on the Landscape Sensitivity Study 2012. The capacity gives a figure of the number of dwelling units each settlement could accommodate on greenfield sites within areas of low and medium landscape sensitivity. This does not reflect the potential each settlement may have to reuse or redevelop brownfield sites (previously developed land) including buildings. Policy GP4 Spatial Strategy sets out the sequential test for sites which requires that opportunities to develop previously developed land and buildings should be considered before developing greenfield land.
- 11.225. Table 11.2 also provides an estimate of local housing need based on a Park-wide survey in 2008 undertaken by the National Park Authority and the Exmoor, North Devon and West Somerset Rural Housing Project. However, in some settlements a significant proportion of local affordable housing need will have been met by more recent affordable housing developments – where relevant this information has been provided in the footnotes.

TABLE 11.2 SETTLEMENT CAPACITY

SETTLEMENT	Capacity for small scale housing development on greenfield sites within and adjoining named settlements in terms of landscape sensitivity ⁵⁰⁷	Estimated capacity - number of units	Estimate of local (parish) affordable housing need
LOCAL SERVICE CENTRES			
Dulverton	The long-term capacity for housing development in Dulverton is moderate to low. Therefore it is considered that there is capacity to address the housing needs of the parish over the longer term, and some need in its adjoining parishes.	26	12 ⁵⁰⁸
Dunster	Dunster has low overall capacity for future housing development due to the high landscape value associated with the settlement, and therefore it is considered that it will only be able to address the housing needs of the parish over the longer term.	21	8
Porlock	Moderate overall capacity for future housing development has been identified in Porlock. The capacity available for new build housing in Porlock over the longer term may be sufficient to address the needs of the parish and those adjoining parishes where capacity is low.	47	18 ⁵⁰⁹
Lynton & Lynmouth	Lynton & Lynmouth has moderate capacity for housing over the long term. In conjunction with Barbrook the capacity for new-build housing development on greenfield sites may be able to address the needs of the parish and some need in its adjoining parishes that have low capacity. Lynton & Lynmouth is considered to have greater opportunities for brownfield development compared with other locations.	12	18
VILLAGES			
Allerford	Allerford has a low capacity for future housing development. Due to the constraints and low capacity for new build housing development it is considered that, over the long term, Allerford will only be able to address the needs of the parish.	13	6
Barbrook	Barbrook has a moderate capacity for future housing. In conjunction with Lynton & Lynmouth the capacity for new-build housing development on greenfield sites may be able to address the needs of the parish and some need in its adjoining parishes that have limited capacity.	10	See Lynton
Brendon	Brendon has moderate capacity for future housing development and may be able to address the needs of the parish and its adjoining parishes – specifically Oare and Exmoor where capacity is limited.	20	6
Bridgetown / Exton	Bridgetown and Exton have a moderate capacity for housing development and may be able to address the housing needs of the parish and need that may arise in its adjoining parishes.	21	2

⁵⁰⁷ Exmoor National Park Landscape Sensitivity Study 2012

⁵⁰⁸ A significant proportion of local housing need has been met through the development of 12 social rented homes completed in 2011

⁵⁰⁹ A significant proportion of local housing need will be met through the development of 12 affordable rented and 3 shared ownership homes due to be completed in 2013.

SETTLEMENT	Capacity for small scale housing development on greenfield sites within and adjoining named settlements in terms of landscape sensitivity ⁵⁰⁷	Estimated capacity - number of units	Estimate of local (parish) affordable housing need
Brompton Regis	Brompton Regis, in terms of its size, has a moderate capacity for future housing development. Over the long term it is considered that this available capacity will predominantly help to address the needs of the parish and potentially some need arising from its adjoining parishes with low capacity.	11	3
Challacombe	Challacombe has a very low capacity for future housing development. Therefore, it is likely that Challacombe will only be able to address its own needs for affordable housing over the long term.	5	0
Cutcombe / Wheddon Cross	Both Cutcombe and Wheddon Cross were assessed as having moderate capacity for future housing development. There is potential capacity to accommodate new build development to address local needs in the parish and additional need that may arise in its adjoining parishes particularly where future capacity is limited.	21	5 ⁵¹⁰
Exford	Exford has moderate capacity for future housing development and therefore is considered to be able to address the local need for housing arising in the parish and those adjoining parishes where capacity is limited.	20	12 ⁵¹¹
Luxborough	There is low capacity for future housing development in Luxborough, and it will therefore only be able to address its own needs for affordable housing over the long term.	6	1
Monksilver	There is low capacity for future housing development for the area of Monksilver within the National Park, and therefore is considered to be able to only address its own parish housing needs over the longer term. However there may be additional capacity in the area of Monksilver outside the National Park which could mean that there would be some ability to address needs arising in those adjoining parishes without a defined settlement.	5	0
Parracombe	Parracombe has moderate capacity for future housing development and is considered may be able to address the local affordable housing need arising in its parish and those adjoining parishes, where capacity is low or where there is no defined settlement in particular.	23	4
Roadwater	The future capacity for housing development in Roadwater is assessed as moderate and therefore may address the housing needs of the parish (within the National Park) over the longer term and those adjoining parishes with low capacity or no defined settlement.	18	3
Simonsbath	Simonsbath has very low capacity to accommodate further housing development. Due to its limited capacity it is likely that Simonsbath will only be able to address its own needs for local affordable housing.	3	4

⁵¹⁰ A significant proportion of local housing need met through development of 10 social rented homes in 2011

⁵¹¹ A significant proportion of local housing need met through development of 9 social rented homes in 2009

SETTLEMENT	Capacity for small scale housing development on greenfield sites within and adjoining named settlements in terms of landscape sensitivity ⁵⁰⁷	Estimated capacity - number of units	Estimate of local (parish) affordable housing need
Timberscombe	Timberscombe has a moderate capacity in terms of future housing development, although flood constraints may reduce this capacity. Therefore it is considered that Timberscombe will only be able to address its own needs for local affordable housing over the long term.	17	7
Winsford	There is low capacity for future housing development in Winsford. The potential capacity to accommodate new build housing development in the village, suggests that it may address its own needs for local affordable housing and that of its adjoining parishes where capacity is low.	20	6 ⁵¹²
Withypool	Withypool has low future capacity for housing development. Due to its limited capacity it is likely that Withypool will only be able to address its own needs for local affordable housing over the long term.	6	4
Wootton Courtenay	Wootton Courtenay has moderate capacity for future housing development. Due to its limited capacity it may only be able to address its own needs for affordable housing over the long term.	6	4
RURAL COMMUNITIES			
Countisbury	Landscape sensitivity analysis not undertaken for this settlement. It is considered that policy safeguards will ensure that the level of development/growth is proportionate to the settlement size and will not harm the landscape character or local environment (GP4 Spatial Strategy).	-	X ⁵¹³
Hawkridge	As above (see Countisbury)	-	X ⁵¹⁴
Heasley Mill	As above (see Countisbury)	-	1 ⁵¹⁵
Martinhoe	As above (see Countisbury)	-	1
Kentisbury	As above (see Countisbury)	-	2
Luccombe	Luccombe has very low capacity for future housing development. It is therefore likely that Luccombe will only be able to address its own needs of affordable housing over the long term.	2	1
Oare/ Malmsmead	As above (see Countisbury)	-	1

⁵¹² One intermediate affordable home permitted

⁵¹³ Need incorporated within housing need figures for Brendon

⁵¹⁴ Need incorporated within parish housing need figures for Withypool

⁵¹⁵ Reflects housing need for the area of North Molton parish within the National Park – one intermediate affordable home permitted.

SETTLEMENT	Capacity for small scale housing development on greenfield sites within and adjoining named settlements in terms of landscape sensitivity ⁵⁰⁷	Estimated capacity - number of units	Estimate of local (parish) affordable housing need
Selworthy	As above (see Countisbury)	-	X ⁵¹⁶
Twitchen	As above (see Countisbury)	-	0
West Porlock	As above (see Countisbury)	-	X ⁵¹⁷
Withycombe	As above (see Countisbury)	-	1
Porlock Weir	As above (see Countisbury)	-	X ⁵¹⁸

⁵¹⁶ Need incorporated within housing need figures for Selworthy & Minehead Without parish as a whole (see Allerford)

⁵¹⁷ Need incorporated within housing need figures for Porlock parish as a whole (see Porlock)

⁵¹⁸ Need incorporated within housing need figures for Porlock parish as a whole (see Porlock)

12. ANNEX 1: THE CONDUCT OF ARCHAEOLOGICAL WORK & HISTORIC BUILDING RECORDING WITHIN EXMOOR NATIONAL PARK

- 12.1 This annex is a guide for developers and their archaeological contractors, historic buildings advisors, architects and consultants and all involved in the planning process. It sets out standards and guidance for archaeological work and historic building recording in Exmoor National Park undertaken as part of the planning process. It will ensure that all work of this kind within Exmoor National Park is carried out in a professional manner and to a high standard.

INTRODUCTION

- 12.2 The National Planning Policy Framework 2012 considers that the Historic Environment is a material consideration in the determination of planning applications (paragraphs 5.88-5.110 of the Exmoor National Park Local Plan, set out the importance of Exmoor's Heritage Assets, and policies CE-S4 and CE-D3, are designed to protect them).
- 12.3 The purposes of the National Park as set out in Section 61 of the Environment Act 1995 are: 'to conserve and enhance the natural beauty, wildlife and *cultural heritage* of the area' and 'to promote opportunities for the understanding and enjoyment of the special qualities by the public'.
- 12.4 This document sets out the practical process of achieving the full potential of recording and preserving the National Park's archaeological and built heritage. Also within the scope of this document is the archaeological recording of historic buildings.

UNDERLYING PRINCIPLES

- 12.5 The professional body for field archaeologists is the Institute for Archaeologists (IfA) whose members are bound to adhere to a Code of Conduct⁵¹⁹. It is preferable that projects are managed by a Member of the IfA (MIFA). However, the suitability of the manager will be judged by the National Park Authority on their past record. The project manager will be expected to ensure that all project staff and sub-contractors are suitably qualified and experienced. The IfA's Code of Conduct contains four underlying principles and all those involved should remember these four statements:
- a) a member shall adhere to the highest standards of ethical and responsible behaviour in the conduct of archaeological affairs;
 - b) the member has responsibility for the conservation of the historic environment;
 - c) the member shall conduct his/her work in such a way that reliable information about the past may be acquired, and shall ensure that the results be properly recorded;
 - d) the member has responsibility for making available the results of archaeological work with reasonable dispatch.

THE PLANNING PROCESS - BEFORE A PLANNING APPLICATION IS SUBMITTED

- 12.6 The National Park Authority welcomes informal discussion at pre-application stage. Applicants are advised to discuss the potential impact of their application on heritage assets in advance of submitting a planning application or General Permitted Development Order (GPDO) consultation. Mitigation strategies and assessment and evaluation techniques are best addressed early in the consultation process.

⁵¹⁹ By-Laws: Code of Conduct – Institute for Archaeologists (last updated 08 October 2013)

ASSESSMENT AND EVALUATION

- 12.7 When a planning application is assessed by the National Park Authority (pre- or post validation of the application) there may be insufficient information available to make a reasoned decision concerning the likely effect of the proposal on any heritage assets affected, including their setting. Under Policies CE-S4 or CE-D3 an archaeological impact assessment and evaluation may be required before the application is determined. The archaeological assessment and evaluation process should be agreed in writing with the National Park Authority. It may involve either or both of the following processes:
- 12.8 *Desk –Based Assessment* - an assessment of the known/potential historic environment resource or heritage asset within a specified area/site, located on land or underwater. It consists of a collation of existing written and graphic information in order to identify the likely character, extent, quality and worth of the known or potential archaeological resource in a local, regional, national or international context as appropriate.
- 12.9 *Evaluation* - a limited programme of non-intrusive and/or intrusive fieldwork which determines the presence or absence of archaeological features, structures, deposits, artefacts or ecofacts within a specified area/site, on land or underwater. It may include trial-trenching, geophysical survey, environmental sampling and building recording.

ASSESSMENT AND EVALUATION REPORT

- 12.10 The results of the assessment and evaluation stage should be presented as a written report to the National Park Authority. The report should define the location, extent and significance of archaeological remains and other historic assets, and illustrate how these may be affected by the proposals including their setting. It is advisable to discuss the contents of the report with the National Park Authority at draft stage.

THE PLANNING PROCESS – AFTER PLANNING PERMISSION IS GRANTED

PLANNING CONDITIONS

- 12.11 A planning application may be approved with archaeological conditions. This condition may overcome considerations that would otherwise have led to the application being refused. Generally archaeological work or building recording carried out through the planning process is the result of a condition. This will require the applicant to gain agreement in writing from the National Park Authority before development begins. The condition is not fulfilled until the applicant has completed the required work and has deposited a completed archaeological report with the National Park Authority and the completed archive with the appropriate museum or other agency.

THE SPECIFICATION

- 12.12 In the majority of cases the National Park Authority will require that the contractor produces a specification or *Written Scheme of Investigation* (WSI) to be agreed in writing by the National Park Authority in advance. The WSI should set out the basic requirements of the project and the standards which are to be adhered to. A brief for this can be requested from the National Park Authority.
- 12.13 The specification will be expected to:
- contain a reasoned discussion of the field and analytical techniques selected (see 12.9, 12.16, 12.18 and 12.19);
 - give details of techniques, artefact collection policies, discard policies; environmental sampling strategy and recording techniques (see 12.24-5);
 - explain the reasons for the rejection of a particular technique.
 - outline the proposed reporting procedure and the likely timetable, as well as the anticipated content of the final and any other reports (see 12.22-3).

- e) include an indication of the level and format of the archive to be produced (see 12.26).
 - f) give a timetable for obtaining the necessary consents, its preparation and deposition.
 - g) how the results of the project should be reported and published (see 12.22-3).
- 12.14 In addition to normal contingency provisions, the National Park Authority requires a compulsory archaeological science contingency to be included in most projects. This will normally be 15% of the total tender, but the National Park Authority may vary this rate in response to the specific potential of the project.
- 12.15 In addition to any provided brief, the points of reference for the production of the specification or WSI should be based on the advice in the National Planning Policy Framework, and guidance available from the Institute for Archaeologists (IfA), English Heritage, Arts Council England, Archaeological Archives Forum and Society of Museum Archaeologists.

HISTORIC BUILDING RECORDING

- 12.16 Archaeological building investigation and recording is a formal programme of work intended to establish the character, history, date, form and archaeological development of a structure. It may be required as part of an archaeological evaluation (prior to a planning application) to help in the determination of that application, or as part of an archaeological condition in order to record aspects of a building before and/or as development takes place. Such recording should result in the production of an ordered archive and report. The level and extent of recording will be covered within the agreed specification or WSI.

GROUNDWORKS

- 12.17 A planning condition may require a watching brief or a programme of excavations (where the archaeological information is preserved by record) agreed in advance.
- 12.18 A *watching brief* is a formal programme of observation and investigation conducted during any operation carried out for non-archaeological reasons within a specified area or site on land or underwater, where there is a possibility that archaeological deposits may be disturbed or destroyed. The programme will result in the preparation of a report and ordered archive. One of four levels of watching brief will be stipulated:
- a) A comprehensive watching brief - where archaeologists are present at all times during the groundwork operations.
 - b) An intensive watching brief – where archaeologists are on site during the undertaking of sensitive groundwork operations.
 - c) An intermittent watching brief – where archaeologists are on site to observe the groundworks after digging operations have been completed, but before construction work commences.
 - d) A partial watching brief – where observation takes place only when considered appropriate.
- 12.19 *Archaeological excavation (preservation by record)* – a programme of controlled, intrusive fieldwork with defined objectives which examines and records archaeological deposits, features and structures and, as appropriate, retrieves artefacts, ecofacts and other remains within a specified area or site (on land or underwater). The records made and objects gathered during fieldwork are studied and the results of that study published in detail appropriate to the project and in the light of findings.

REPORT SUBMISSION

- 12.20 The specification or WSI should define the form and content of the report. The report must be submitted to and approved by the National Park Authority before the planning condition is fulfilled. There are four broad levels of publication:
- a) *evaluation and assessment report* on the findings of a programme of work for submission in support of a planning application or as part of an archaeological condition attached to a

planning permission, it should be written to address the requirements of the client and the planning authorities;

- b) *brief academic report*. A notification of the work to the archaeological community;
- c) *full academic publication* to analyse and synthesise the full implications of the fieldwork. It should be addressed to the specialist archaeological community;
- d) *popular publication* to share the results of the fieldwork with the public.

12.21 The appropriate level of publication should be set out in the specification. However, archaeological discoveries may warrant a different level of publication from that initially chosen and the final form of publication should be agreed with the National Park Authority. Three copies of the report/s should be submitted within six months of the completion of fieldwork (unless otherwise agreed in writing) or, in the case of an evaluation or assessment, with the planning application.

TREATMENT OF ENVIRONMENTAL EVIDENCE, ARCHAEOLOGICAL MATERIALS AND ARCHIVING

ENVIRONMENTAL EVIDENCE

12.22 Environmental evidence is an important element of the archaeological record. During a field evaluation an accurate assessment of the preservation of environmental evidence including animal bone, shell, waterlogged and charred organic remains, and the condition of any buried soils and sediments should be made. This assessment should be sufficiently comprehensive to allow an evaluation of its potential archaeological relevance and to enable the construction of a structured sampling strategy and post-excavation programme, should further archaeological work be required. When undertaking this work advice must be sought from an appropriate environmental consultant or from the English Heritage Regional Science Advisor. The appropriate specialists should be available or on-site to advise on environmental issues. If a mitigation strategy is to be developed the feasibility of long-term preservation upon the environmental content of the site must be considered.

TREATMENT OF ARCHAEOLOGICAL MATERIALS

12.23 Exmoor National Park Authority requires a minimum standard for the handling of artefactual material retrieved from archaeological interventions. All staff, including all sub-contracted specialists involved with a project, must be made aware of the latest guidance from the Archaeological Archives Forum, English Heritage, Institute for Archaeologists, and Society of Museum Archaeologists, and should follow current best practice. It is imperative that the implications of these documents are noted at the tendering stage, because they may have both practical and financial implications. In particular the advice of museum conservation staff will be of value when handling sensitive materials.

ARCHIVING SYSTEM

12.24 Archaeological material is normally deposited in the receiving museum for the area which has expertise and resources to provide adequately for the long-term conservation and reference of the material. The contractor should contact the museum before the commencement of fieldwork to meet the requirements for the long term storage of the subsequent archive. In exceptional circumstances if agreed that this is not to be the case the National Park Authority and the receiving Museum will require that these standards of care and access will be met with the alternative arrangement.

ADDITIONAL CONSIDERATIONS

PUBLICITY

12.25 Exmoor National Park Authority encourages a positive approach to involving the local community and other interested parties in archaeological projects. Where possible active participation in the form of open days or school visits should be considered. In cases where projects produce locally interesting information a press release may be appropriate. Contracting or consultant units should obtain permission from the site owners prior to involving the public or media. Where appropriate, further publication of 'summary' reports should be considered for a wider public audience in the form of leaflets or booklets.

LEGAL AND ETHICAL CONSIDERATIONS

12.26 Legal and ethical factors must be considered when undertaking archaeological fieldwork. These relate particularly (but not exclusively) to human remains and treasure (Treasure Act 1996 and associated Code of Practice).

- a) All unexpected human remains encountered must be left *in situ* and suitably protected from deterioration. All finds of human remains should be reported to the Police and the Coroner's Office. If removal is necessary and unavoidable it must be carried out in compliance with the statutory provisions of the Burial Act 1857 and subsequent legislation and after obtaining a licence for exhumation from the Home Office. The excavator must comply with the conditions of the licence as well as other Home Office and environmental health regulations. All reasonable requests as to the method of removal, re-interment or disposal of the remains and/or associated items should be complied with. The simplest way to safeguard remains that are not to be excavated is by sensitive back-filling as soon as possible.
- b) Finds of treasure (as defined) must be archaeologically recorded and removed to a safe place and reported to the local Coroner within 28 days in accordance with the procedures of the Treasure Act 1996 and Code of Practice. If removal of such finds is not possible on the same day then adequate security arrangements must be made.
- c) Archaeological contractors will be expected to act in accordance with the wishes of the site owner/agent and local residents. They should follow access and office procedures on development sites as well as behaving appropriately as far as noise and other factors are concerned.
- d) Adherence to the Museum Association's Code of Ethics is expected in relation to the management of the archive and associated information.
- e) Finds from the foreshore (regardless of age and importance) are subject to the requirements of the Merchant Shipping Act 1995.

NOTIFICATION

12.27 In order for effective monitoring of archaeological projects, Exmoor National Park Authority and the intended recipient of the archive should be notified prior to the commencement of work to a timescale agreed within the WSI. The letter should contain basic information including:

- a) site name and address;
- b) planning application number (if relevant);
- c) start date of work;
- d) name of project officer;
- e) specialists being used.

The National Park Authority should be notified in writing, and agreement sought prior to any changes.

HEALTH AND SAFETY

12.28 The health and safety of all those involved in every archaeological project is paramount. Archaeologists are expected to operate in accordance with current health and safety legislation and industry regulations. At all times health and safety must take priority over archaeological matters.

INSURANCE

12.29 The IfA Code of Conduct stipulates that a member shall ensure that adequate insurance cover is maintained for persons or property which may be affected by his or her archaeological activities. It is also possible for developers to insure against the consequences of an unexpected discovery, for example a find requiring expensive conservation, provided sufficient evaluation has been previously undertaken.

SOURCES OF INFORMATION

DCLG (March 2012), *National Planning Policy Framework*, The Stationery Office, London

Brown, D.H., (2007) *Archaeological Archives - a guide to best practice in creation, compilation, transfer and curation*, Institute for Archaeologists on behalf of the Archaeological Archives Forum

Watkinson D and Neal V (2001) *First Aid for Finds*, RESCUE/United Kingdom Institute of Conservators

Current guidance documents available from:

English Heritage

Institute for Archaeologists

Archaeological Archives Forum

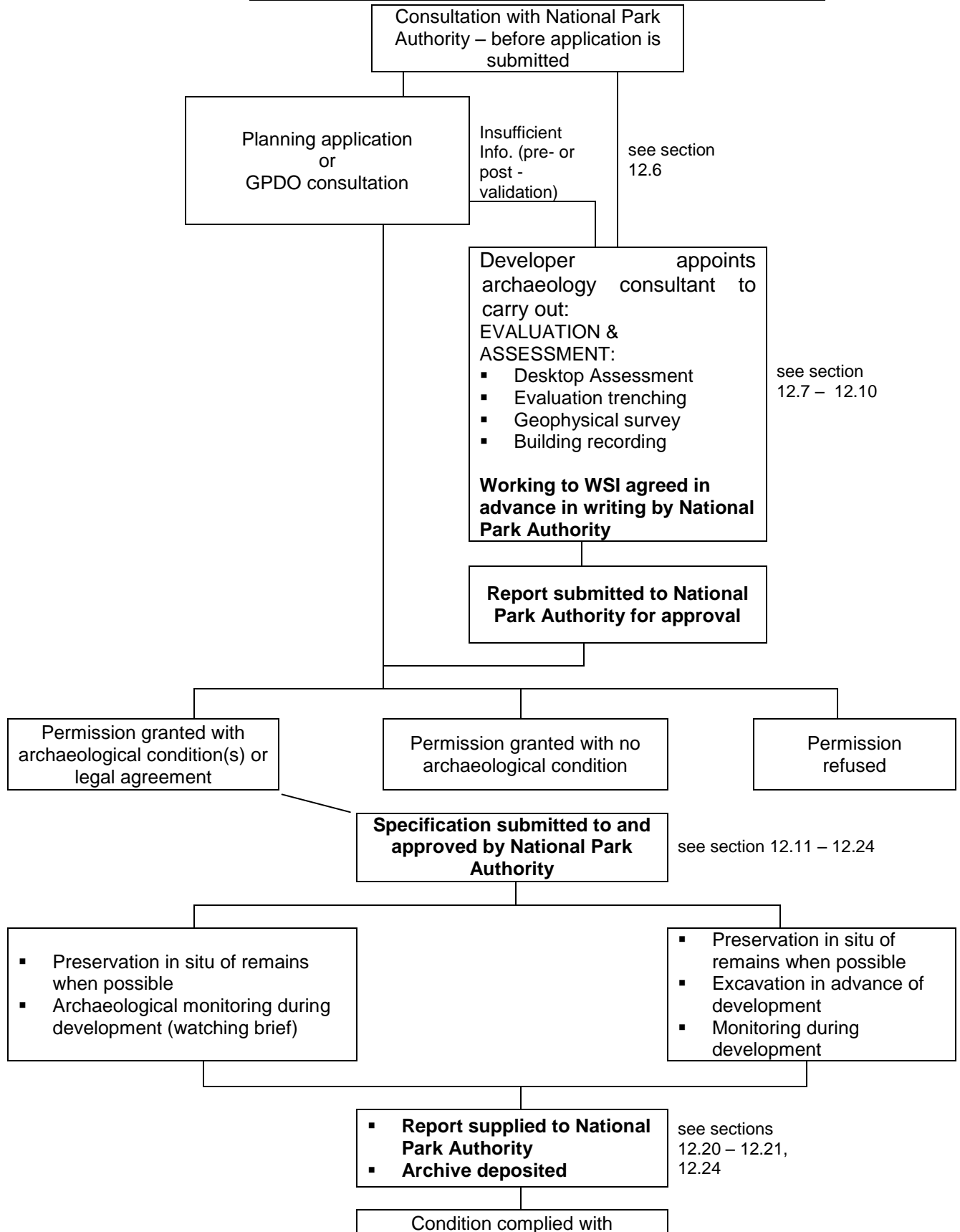
Society of Museum Archaeologists

ACKNOWLEDGEMENT

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Table 12.1

THE HISTORIC ENVIRONMENT AND THE PLANNING PROCESS



13. ANNEX 2: RURAL LAND BASED WORKER DWELLINGS

- 13.1 Traditional farming and woodland management have helped to create Exmoor’s distinctive landscape. Sustainable agriculture and forestry are essential for maintaining the characteristic landscapes of the National Park, can play an important role in helping to manage and enhance Exmoor’s wildlife and the environment and are major contributors to the local economy.
- 13.2 This Annex provides additional information and guidance in relation to the following policies:
- a) HC-D4 Conversions to Dwellings in the Open Countryside
 - b) HC-D5 New Build Dwellings in the Open Countryside
 - c) HC-D6 Rural Workers
 - d) HC-D9 Residential Caravans
- 13.3 Policy HC-D7 ‘Succession Farming’ provides for a second dwelling on established farms that are financially sustainable where the criteria for a full time worker cannot be fully satisfied. This Annex will be applied in the case of applications under Policy HC-D7 save for paragraph 13.8(b) of this Annex which requires that the need relates to a full-time worker, primarily employed in a rural land-based activity and does not relate to a part-time requirement and paragraphs 13.19 and 13.20 which relate to ‘temporary rural land-based worker dwellings’ since succession dwellings will only be considered on established farms.
- 13.4 These policies and Annex 2, are based on long tested methodology which is considered to be an appropriate way to approach “the essential need for a rural worker to live permanently at or near their place of work in the countryside” (National Planning Policy Framework) in terms of proposals for new dwellings in the open countryside. Additionally, the NPPF recognises that National Parks are areas where development should be restricted⁵²⁰. It states that great weight should be given to conserving landscape and scenic beauty in National Parks which have the highest status of protection in relation to landscape and scenic beauty while the conservation of wildlife and cultural heritage are important considerations and should be given great weight.
- 13.5 The National Planning Policy Framework states that isolated new houses in the countryside should be avoided unless there are special circumstances. One of the few circumstances in which isolated residential development may be justified is when accommodation is required to enable the essential need for a rural worker to live permanently at or near their place of work in the countryside⁵²¹. Nevertheless, it will often be possible, as convenient and more sustainable for such workers to live in settlements, suitable existing dwellings, or by reusing/converting a suitable existing building on the holding or nearby within an established building group, so avoiding new and potentially intrusive development in the open countryside. However, there will be some cases where the nature and demands of the work concerned make it essential for one or more people engaged in a rural land-based enterprise to live at, or very close to, the site of their work. Whether this is essential in any particular case will depend on the needs of the enterprise concerned and not on the personal preferences or circumstances of individuals
- 13.6 Given the concession that the planning system makes for new occupational dwellings in the countryside, it is essential that all applications for planning permission for such dwellings in the countryside are scrutinised thoroughly so that only genuine proposals are approved. In particular, it will be important to establish whether the stated intentions to engage in agriculture, forestry or any other rural land-based enterprise, are genuine, are reasonably likely to materialise and are capable of being sustained for a reasonable period of time. It will also be important to establish that the needs of the intended enterprise require one or more of the people engaged in it to live nearby.
- 13.7 A ‘rural land-based enterprise/activity’ is considered to include agriculture, forestry, and other land-based enterprise/activity which requires a location in the open countryside and obtains their primary inputs from the land holding they intend to be based at to sustain the business. Policy HC-D6 reflects National Park designation and states that the enterprise shall be extensive in

⁵²⁰ CLG National Planning Policy Framework (2012) Para 14 footnote 9

⁵²¹ Ibid – para. 55

nature, to ensure that the natural beauty and wildlife of the National Park is conserved and unacceptable adverse environmental impacts that can arise from more intensive forms of agriculture are avoided. Intensive activities, especially those that could be located in any location, will not be considered favourably under these policies.

PERMANENT RURAL LAND-BASED WORKER DWELLINGS

- 13.8 New permanent dwellings will only be allowed where they are required to support existing agricultural, forestry or other rural land-based activities on well-established land holdings. Applicants should provide a detailed independently prepared appraisal to accompany any application for a new rural worker's dwelling. The appraisal should provide information relating to the following points:
- a) there is a clearly established *existing* functional need (see paragraph 13.9 below);
 - b) the need relates to a *full-time* worker, primarily employed in a rural land-based activity and does not relate to a part-time requirement;
 - c) the holding and the activity concerned have been established for at least three years, have been profitable for at least one of them, are currently financially sound, and have a clear prospect of remaining so (see paragraph 13.13 below);
 - d) the functional need cannot be fulfilled by another existing dwelling on the unit (or the subdivision of an existing dwelling (see policy HC-D12 Subdivision of Existing Dwellings) any other existing accommodation in the area which is suitable and available for occupation by the workers concerned, or through the conversion/change of use of an existing building on the holding; and
 - e) other planning requirements, including in relation to access, or impact on the countryside, are satisfied.
- 13.9 A *functional test* is necessary to establish whether it is essential for the proper functioning of the enterprise for one or more workers to be readily available at most times. Such a requirement might arise, for example, if workers are needed to be on hand day and night:
- a) in case animals or agricultural processes require essential care at short notice;
 - b) to deal quickly with emergencies that could otherwise cause serious loss of crops or products, for example, by frost damage or the failure of automatic systems.
- 13.10 In cases where the National Park Authority is particularly concerned about possible abuse, the history of the holding will be investigated to establish the recent pattern of use of land and buildings and whether, for example, any dwellings, or buildings suitable for conversion to dwellings, have recently been sold separately from the holding concerned either by the present applicant or previous owners. Such a sale could constitute evidence of lack of need for a new permanent dwelling for a rural worker.
- 13.11 The protection of livestock or other animals associated with the rural land-based enterprise from theft or injury by intruders may contribute on animal welfare grounds to the need for a new rural worker dwelling, although it will not by itself be sufficient to justify one. Requirements arising from food processing, as opposed to agriculture for example, cannot be used to justify a rural worker dwelling. Nor can agricultural needs justify the provision of isolated new dwellings as retirement homes for farmers; such a need may be met under policy HC-D7 Succession Farming – Second Dwellings on Established Farms. Under conventional methods of forestry management, which can involve the use of a peripatetic workforce, new forestry dwellings may not always be justified.
- 13.12 If a functional requirement is established, it will then be necessary to consider the number of workers needed to meet it, for which the scale and nature of the enterprise will be relevant.

- 13.13 New permanent accommodation cannot be justified on the grounds of a rural land-based enterprise unless the enterprise is economically viable. A *financial test* is necessary for this purpose, and in applying this test (see paragraph 13.8(c) above), the National Park Authority will take a realistic approach to the level of profitability, taking account of the nature of the enterprise concerned. Some enterprises which aim to operate broadly on a subsistence basis, but which nonetheless provide wider benefits (e.g. providing ecosystem services and contributing to the conservation or enhancement of the natural beauty and wildlife of the National Park), can be sustained on relatively low financial returns.
- 13.14 The appraisal of functional requirement and financial viability should be confined to a factual statement of the agricultural, or other rural land-based business considerations involved and an evaluation of the specific points on which advice is sought; no recommendation for or against the application should be made. The evidence presented to prove the viability of a rural land-based enterprise will vary according to the type of enterprise and will depend upon the structure of the holding, tenure, the nature of the enterprise and how it is financed. It is considered that in terms of an agricultural enterprise, information on costs of stock, feed, vet care, transport, marketing, electricity, insurance, accountants, water charges, repairs, land rent and financing charges would be taken into account.
- 13.15 The statement should detail land in the applicant's ownership and land within a permanent agricultural tenancy separately from any other land that may be rented on a short term basis. The National Park Authority will base its assessment of the proposal only on land under the applicant's ownership or land held in a longer term tenancy and therefore a dwelling is unlikely to be permitted where the financial viability of a rural land-based enterprise depends upon an insecure or short term tenancy or where a significant proportion of land/buildings identified as part of the functional holding is rented.
- 13.16 The National Park Authority will duly consider the statement, all other evidence available, and may also procure additional advice from a qualified consultant prior to determining the application.
- 13.17 Rural worker dwellings should be of a size commensurate with the established functional requirement. Policy HC-D6 requires that the net floorspace will be 90sqm or less unless the Authority is satisfied that the needs of the holding require a larger dwelling. Larger dwellings should be of a size commensurate with the needs of the holding, and should not be expensive to construct in relation to the income it can sustain in the long-term. It is the requirements of the enterprise, rather than those of the owner or occupier, that are relevant in determining the size of a dwelling larger than 90sqm net internal floorspace.
- 13.18 Rural worker dwellings should be sited so as to meet the identified functional need and to be well-related to existing buildings on the holding, or other dwellings.

TEMPORARY RURAL LAND-BASED WORKER DWELLINGS

- 13.19 If a new dwelling is essential to support a new rural land-based activity, whether on a newly-created holding or an established one, it should normally, for the first three years, be provided by a caravan, a wooden structure which can be easily dismantled, or other temporary accommodation as set out under policy HC-D9 Residential Caravans. It should satisfy the following criteria:
- a) clear evidence of a firm intention and ability to develop the enterprise concerned (significant investment in new farm buildings is often a good indication of intentions);
 - b) functional need (see paragraph 13.9 of this Annex);
 - c) clear evidence that the proposed enterprise has been planned on a sound financial basis;
 - d) the functional need cannot be fulfilled by subdivision of an existing dwelling, another existing dwelling on the unit, or any other existing accommodation in the area which is suitable and available for occupation by the workers concerned; and
 - e) other normal planning requirements, e.g. on siting and access, are satisfied.

- 13.20 If permission for temporary accommodation is granted, permission for a permanent dwelling will not subsequently be given unless the criteria in paragraph 13.8 above are met. The National Park Authority will ensure that conditions are attached to any planning permission to state the period for which the temporary permission is granted, the fact that the temporary dwelling will have to be removed, and the requirements that will have to be met if a permanent permission is to be granted. Successive extensions to a temporary permission over a period of more than three years will not normally be granted, nor will temporary permissions be granted in locations where a permanent dwelling would not be permitted.

OCCUPANCY CONDITIONS

- 13.21 Planning permissions for a rural land-based dwelling will be subject to conditions and planning obligations.
- 13.22 Where the need to provide accommodation to enable farm, forestry or other rural land-based workers to live at or near their place of work has been accepted as providing the special justification required for new, isolated residential development in the countryside, it will be necessary to ensure that the dwellings are kept available for meeting this need. For this purpose planning permission will be made subject to an occupancy restriction. Similar occupancy restrictions may also be attached to any existing dwelling on the holding, under the control of the applicant, where a new rural worker's dwelling is granted planning permission. A planning obligation will also be used to tie the dwelling to the holding to prevent them being sold off separately in the future without further application to the National Park Authority to vary the terms of the obligation. In such circumstances, the applicant should demonstrate that there are reasonable and valid grounds for doing so.
- 13.23 Changes in the scale and character of rural land-based enterprises may affect the longer-term requirement for dwellings for which permission has been granted subject to an agricultural/forestry or a rural worker occupancy condition. Should such dwellings, and others in the open countryside, become vacant or no longer required, policy HC-D10 Replacement of Rural Workers Occupancy Conditions sets out the requirements for the removal of a condition or variation of a planning obligation that limits the occupancy of a dwelling to a rural worker.