

# WRITTEN STATEMENT


Session 5:


SECTION 8 Achieving Enjoyment for All &


SECTION 9 Achieving Accessibility for All

EXMOOR NATIONAL PARK LOCAL PLAN 2011 - 2031  
EXAMINATION  
JUNE 2016

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# 1 Sustainable Tourism

## Question 5.1: Should the references in policy RT-S1 to “quiet enjoyment” and “experience of tranquillity” be better defined in order to avoid unduly restricting recreational activities? (CE)

1.1 The Crown Estate response [0067/19] considered policy RT-S1 to be unsound due to a lack of clarity regarding emphasis placed on 'quiet enjoyment' and 'experience of tranquillity' which was considered to give the impression that any activity that does not fall into this category will be refused

1.2 The supporting text to policy RT-S1 provides an explanation of the type of recreational activity which may not be considered acceptable within the National Park due to the adverse impact on tranquillity and the quiet enjoyment of the area. Paragraph 8.12 specifically states:

*This does not imply no noise generation at all, but there are some recreational pursuits such as motorised sporting activities and clay-pigeon shooting grounds that are considered to be inappropriate in the National Park as they have the potential to have an adverse effect on the quiet enjoyment of others through exposure to noise disturbance that may be sustained for significant periods of the day, throughout the year (CC-S7 Pollution). Impacts on landscape character and tranquillity, through intensity of activity, noise, and overall scale will be key considerations in determining whether proposals for recreation and tourism developments are acceptable.*

1.3 The reference to clay pigeon shooting ground as inappropriate recreation development is appropriate. The NPA has experience of this type of activity as two applications were considered and refused for this type of activity by the National Park Authority – the main reason being the unacceptable noise and disturbance to local residents and users of public rights of way, which was considered to be contrary to policies within the development plan at that time.

1.4 Paragraph 8.12 includes a cross reference to policy CC-S7 Pollution, which has regard to noise pollution. The Schedule of Proposed Changes [[SD5](#): ref 381, page 166-7] also specifies a suggested amendment to the supporting text through a cross reference to additional information relating to noise pollution in paragraph 5.151 of the Plan [[SD1](#)] to assist with clarifying this particular issue. A change to paragraph 5.151 is also proposed [[SD5](#): ref 156, page 69] to clarify the position in relation to noise levels and reference to the Noise Policy Statement for England.

- 1.5 The Authority contacted The Crown Estate to suggest that we prepare a Statement of Common Ground regarding this issue, however this was declined as they feel their written representations will suffice.

## 2 Safeguarding Serviced Accommodation

### Question 5.2: Are the restrictions that policy RT-D3 places on changes of use of owner-occupied guest-houses and bed-and-breakfast establishments reasonable? (RB)

- 2.1 Policy RT-D3 specifies the tests for safeguarding serviced accommodation in the National Park. This provides for the change of use to other employment uses or to a Principal Residence dwelling in certain circumstances, without the need to demonstrate that the existing (C1) use is unviable. It is only where these provisions (set out in clause 1 of the policy) cannot be met that an applicant should demonstrate the business is unviable before applying for a change of use.
- 2.2 The policy was structured in this way as a result of consultation and experience in the determination of proposals for the change of use of serviced accommodation under the adopted Local Plan 2001-2011. The adopted Plan states that the change of use of serviced accommodation in the Villages and Open Countryside to residential use should only provide for local affordable needs. In the Local Rural Centres (Dulverton, Lynton & Lynmouth and Porlock) the change of use and conversion of buildings may be to one open market dwelling or, where more than one dwelling is provided, at least 50% should contribute towards meeting local affordable housing needs.<sup>1</sup>
- 2.3 It was considered that the new Local Plan should provide more flexibility in certain circumstances – particularly where dwellings which had changed use to hotels or guesthouses and applicants wished to revert to a dwelling. In certain cases the building has remained in the same ownership.
- 2.4 There has been support for this policy approach<sup>2</sup>, which also ensures that any permission granted has a condition attached to ensure that such flexibility can remain – i.e. so the building can operate as a Principal Residence dwelling or a C3 guesthouse. This approach is also intended to be used for any building in residential use changing to a guesthouse or hotel in the future through policy RT-D1 Serviced Accommodation.

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<sup>1</sup> ENPA (2005) Exmoor National Park Local Plan 2001-2011 including minerals and waste policies  
 Policy E3 Safeguarding Existing Employment Land and Buildings  
 Policy H4 Conversions to Dwellings in Local Rural Centres  
 Policy H6 Conversions to Dwellings in Villages  
 Policy H7 Conversions to Dwellings in the Open Countryside

<sup>2</sup> 2013 [Draft Local Plan Schedule of Representations](#)

- 2.5 For larger, commercially run premises, including those which were purposely built as hotels, applications for the change of use to a dwelling should provide evidence to demonstrate that they are no longer viable. This includes marketing the business for a minimum of 12 months. Such premises have generally been intentionally purchased by the owners as a hotel/guesthouse to run as a business. Therefore, the intention of the policy is to retain/safeguard visitor accommodation unless it can be demonstrated that it is no longer viable. A topic group discussion held with tourism providers in November 2011 specifically discussed aspects of change of use and viability and this was used in the drafting of the policy (see Appendix 1).
- 2.6 The Authority considers that the tests specified in Policy RT-D3 for changes of use for serviced accommodation provide sufficient flexibility and are reasonable.



### 3 Non-serviced Accommodation

#### Question 5.3: Is there justification for policy RT-D4, clause 2(b)?

3.1 Clause 2.b) of policy RT-D4 states:

*b) in respect of changing the use of traditional farm buildings, the entire range of such buildings within a farmstead, will not be permitted to be converted to protect the historic character and significance of the buildings collectively (CE-S5);*

3.2 The supporting text in paragraph 8.40, preceding the policy provides an explanation:

*8.40 The conversion of traditional farm buildings to holiday lets is a popular form of diversification for rural land based businesses. These rural buildings have historic significance, interest and sensitivity; therefore it is important that the whole farmstead complex of traditional buildings is not converted to ensure the retention of some of the original vernacular form and character of these traditional buildings – this will be decided on a case by case basis. This approach also enables space for ancillary storage, utility, or continuing agricultural use, and avoids the pressure for additional new build development in the future.*

3.3 Many farmsteads on Exmoor are of historic interest and often have listed buildings associated with the building group, these and other historic farmsteads, which are recorded as locally important heritage assets, can be identified on the Exmoor Historic Environment Record.<sup>3</sup> These historic farmsteads were identified through a study in 1997 that evaluated old steadings within the National Park and graded them as 1, 2/1, 2/2, 3 and 4.

3.4 Traditional buildings, particularly simple rural buildings associated with farmsteads, require sympathetic conversion ensuring that traditional approaches to materials and detailing are taken to conserve the intrinsic quality, character and appearance of the buildings. Adaptations, particularly to residential use, can have the ability to harm the simplicity of these buildings through overly intensive uses and excessive internal partitioning. It is considered that an approach which leaves some buildings unconverted e.g. to enable space for ancillary storage or continuing agricultural use (or another use which requires less intrusive alteration) would help to conserve part of the historic fabric and character of the building complex in a way that reflects its existing form and use.

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<sup>3</sup> [www.exmoorher.co.uk](http://www.exmoorher.co.uk)

- 3.5 The policy implies that this test will be applied where a farmstead contains a 'range' of traditional buildings – where there is a paucity of such buildings the test will not be applied, but any change will need to be consistent with the principles for conversion and structural alteration stated in Policy CE-S5.
- 3.6 It is considered that based on the historic value of Exmoor's traditional farm buildings and the statutory purpose to conserve and enhance the cultural heritage of the National Park that the policy approach in clause 2.b) is justified.

## 4 Reinstatement of the Lynton & Barnstaple Railway

### Question 5.4: Is there justification for the provisions in policies RT-D13 and RT-S2 regarding the reinstatement of the Lynton & Barnstaple railway? (DG, LG, WG, LH)

- 4.1 Policies RT-D13 and RT-S2 relating to The Lynton & Barnstaple Railway represent an approach which reflects the adopted Local Plan 2001-2011 whilst recognising the ambitions of the reinstatement of the railway over the longer term. The adopted Plan states:

*7.10 ...The National Park Authority has supported the reinstatement of part of the former Lynton and Barnstaple Light Railway at Woody Bay Station, and this promises to be an important visitor attraction. Further restoration of this part of the railway will be considered in the light of Policies in the Plan...<sup>4</sup>*

- 4.2 The Exmoor National Park Partnership Plan [CE3] includes a Strategic Activity to “Promote and facilitate more sustainable modes of travel to Exmoor and leisure use within the National Park” and specifies an action with delivery partners which states:

*B2.15: Support opportunities for new and improved access and travel modes including Lynton and Barnstaple Railway, Severn Link ferry, West Somerset Railway link*

- 4.3 The Your Future Exmoor community events included flags where people could indicate on the maps whether they would like the railway to be reinstated or whether they were worried about the reinstatement. There were 23 flags in support of the reinstatement whilst 4 stated they were worried. The community events were generally supportive of the reinstatement of the railway [EB1].
- 4.4 The Plan therefore safeguards the route of the dismantled Lynton & Barnstaple Railway in policy RT-D13 and sets out the key principles for any reinstatement proposals in strategic policy RT-S2. This represents a coordinated strategic cross boundary policy approach with North Devon Council in the North Devon and Torridge Local Plan.<sup>5,6</sup>

<sup>4</sup> ENPA (2005) Exmoor National Park Local Plan 2001-2011 including policies on minerals and waste (paragraph 7.10)

<sup>5</sup> [North Devon & Torridge Local Plan Publication Draft](#) –

Policy ST10 Transport Strategy (1)(g) safeguarding routes and exploring opportunities for the reuse and reinstatement of former railway lines

BAR16: Lynton & Barnstaple Railway

<sup>6</sup> [SD10](#) - Duty to Cooperate Statement May 2016

- 4.5 The consultation on the Draft Local Plan (November 2013) demonstrated considerable support for the policies relating to the safeguarding of the route and principles for the reinstatement of the railway.<sup>7</sup> The policy was amended to address some concerns raised during this consultation, not least because of unnecessary repetition where certain clauses could be removed or amended as other policies in the Plan would apply.
- 4.6 The consultation on the Publication Draft Local Plan also illustrated the widespread support for these policies with 111 responses (out of a total of 394 responses to the whole plan) supporting these policies' with six responses objecting.<sup>8</sup>
- 4.7 The Lyn Plan 2013 – 2028 [EX3] also contains a specific policy (E12) relating to the Lynton & Barnstaple Railway, which provides the criteria for the reinstatement of the railway including the provision of a new station at Lynton.
- 4.8 The policies (RT-D13 and RT-S2) are included within the section relating to recreation and enjoyment of the National Park, as it is considered that the reinstatement of the railway, particularly within the National Park will be primarily a tourist attraction, although the longer term aspirations as a transport connection between Lynton and Barnstaple are recognised.
- 4.9 The dismantled railway is an important heritage asset, therefore the policy ensures that the reinstatement closely replicates the former railway as far as possible within modern transport and health and safety guidelines and legislative requirements. A sequential approach to development ensures that existing original buildings and structures should be sought for re-use in the first instance, before other buildings and structures are considered for re-use, or new buildings. To ensure that the reinstatement is consistent with the achievement of National Park purposes, policy RT-S2 aims to ensure that the reinstatement replicates the former railway as closely as possible.
- 4.10 The Plan states that it should be read as a whole, so any determination of proposals to reinstate the railway will need to consider other policies in the Plan including those relating to landscape, biodiversity, historic environment transport, and pollution.
- 4.11 It is considered that the provisions in policies RT-D13 and RT-S2 are justified as they seek to ensure that any proposed reinstatement should further National Park purposes for the conservation and enhancement of the National Park and promoting the enjoyment and understanding of the National Park.
- 4.12 It should be noted that two applications (60675 and 60676) on the North Devon side of the Park for a proposed extension to the Railway (1.1 miles) were granted [full planning permission](#) on 15<sup>th</sup> June 2016.

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<sup>7</sup> [EB4](#) – Consultation Statement June 2015

<sup>8</sup> [SD9](#) – Regulation 22 Representations Statement May 2016

- 4.13 It should also be noted that five applications were submitted on 8<sup>th</sup> February 2016 in relation to the reinstatement of the Lynton & Barnstaple Railway and associated infrastructure and are in the process of determination.
- [62/50/16/001](#) - Proposed re-instatement of railway line and ancillary development between Killington Lane and Blackmoor Gate
  - [62/50/16/002](#) - Proposed erection of engine shed (2052m<sup>2</sup>), formation of railway sidings and change of use of agricultural barn to railway workshop.
  - [62/50/16/003](#) - Proposed change of use of site of former hotel to railway car park with 162 car parking spaces and pedestrian underpass to station.
  - [62/50/16/004](#) - Proposed demolition of public toilets and shelter, relocation of public car park, erection of new toilets and interpretation building and change of use of land from agricultural to public amenity space together with provision of temporary public car park.
  - [62/50/16/005](#) - Proposed erection of two semi-detached dwellings replacing bungalow demolished to allow re-instatement of railway line - one local needs affordable and one for occupation by railway staff.

## 5 Exmoor Route Network

### Question 5.5: Do paragraphs 9.20-9.22 of the reasoned justification and Map 9.1, with the Authority's proposed changes, properly reflect the categorisation and functions of roads in the National Park?

- 5.1 The categorisation and functions of roads in the National Park is set out in the Exmoor Route Network as detailed in paragraphs 9.20 – 9.22 and AC-S3 Traffic Management and Parking Clause 2. Following consultation comments from Devon and Somerset County Councils, the Authority has proposed changes to the supporting text to provide greater clarity about the Network ([SD5](#) Schedule of Proposed Changes Main Report, Refs 409-411). The Authority has also proposed changes to Map 9.1 ([SD5](#) Schedule of Proposed Changes Appendix 5, Map 9.1) to improve how the Exmoor Route Network is shown, and this is also reflected in the Key Diagram ([SD5](#) Appendix 1).
- 5.2 The Authority has confirmed with both Devon and Somerset County Councils under Duty to Co-operate discussions, that they are happy with the proposed changes – see emails below.




Fri 18/12/2015 15:25

James Anstee <james.anstee@devon.gov.uk>

RE: Exmoor National Park. Local Plan Publication Draft Consultation - Transport Issues

To Clare Reid

Cc Rachel Tuckett

Message  Exmoor Route Network revised wording mod.docx (265 KB)

Dear Clare,

I am happy with the proposed changes.

I would perhaps suggest adding the park boundary to the map key, or including the rest of the A399 county freight route to the map (as indicated outside the park boundary).

Regards

James



Fri 18/12/2015 11:06

Sunita Mills <SMills@somerset.gov.uk>

RE: Exmoor Local Freight Route

To: Clare Reid

Cc: Nisha Devani

Dear Clare,

Good to speak to you earlier and discuss the issues.

I appreciate the challenges of moving larger vehicles around the National Park, we're clearly working towards the same goals of minimising heavy traffic using the local routes although understand that access is required to all parts of Exmoor by these vehicles.

I'm happy to confirm, on behalf of SCC, that we are comfortable with the changes you have suggested.

Please do not hesitate to contact me if there are any other points you would like to discuss.

Kind regards  
Sunita

Sunita Mills  
Service Commissioning Manager: Transport Policy  
Tel: 07500 882387 or 01823 359763

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## 6 Parking Standards

### Question 5.6: Are policy AC-D3 and the associated parking standards in Table 9.1 consistent with national policy? (HBF)

- 6.1 Policy AC-D3 Clause 1 states that "*Proposals will be permitted where they make appropriate provision for parking including for bicycles, motorcycles, disabled users and car sharing, guided by the standards set out in Table 9.1*" ([SD1](#), emphasis added). It is considered that the policy approach complies with national policy as minimum or maximum standards are not imposed - the standards provided seek to guide appropriate parking provision in relation to certain use classes.
- 6.2 The parking standards in Table 9.1 were set using existing ENPA parking standards, guided by the evidence on rural parking standards (Zone C – low population areas under 2,999) developed by Somerset County Council (Chapters 4-6, [EB82](#) Somerset County Council Parking Strategy). Cycle parking standards were incorporated into the table in order to encourage sustainable transport where possible in line with Policy AC-S1.



## 7 Electricity and Telecommunications Networks

### Question 5.7: Are policies AC-S4 and AC-D6 consistent with relevant legislation and with national policy?

- 7.1 Policies AC-S4 and AC-D6 of [SD1](#) are intended to balance the important role that communications networks have in supporting sustainable economic growth and local communities with the need to protect the national designation and meet the statutory purposes of the National Park. The Authority has been very proactive in supporting improved communications networks in the National Park through the Mobile Infrastructure Programme to provide improved telecommunications infrastructure, and the Connecting Dartmoor and Exmoor broadband programmes which are improving the delivery of superfast broadband to these very remote rural areas. The policies encourage development to improve accessibility and the standard of electricity and telecommunications networks where these are appropriate within the National Park context.
- 7.2 Nationally significant infrastructure has a separate consent regime which has regard to National Policy Statements. Policy AC-S4 seeks to resist major and nationally significant electricity and communications networks in the National Park. A cross reference to policy GP2 Major Development is provided which sets out the tests for major development in the National Park consistent with the approach in paragraph 116 of the NPPF, which sets out tests that such a proposal would need to meet. Government planning policy for National Parks is that major development should not take place within a National Park except in exceptional circumstances (CE1 English National Parks and the Broads Vision and Circular, para 31). Statutory undertakers, such as utilities companies and telecommunications providers have a duty under section 62 of the Environment Act 1995 to have regard to National Park statutory purposes. (Please see [SD1](#), para 3.6)
- 7.3 The Authority has proposed amendments to policy AC-D6 ([SD5](#) Schedule of Proposed Changes, Ref 423, page 186) to introduce a sequential approach so that undergrounding is considered first, before other options of providing the need are sought (for example through low carbon and renewable energy development or satellite antennae). Where either of these options is not possible then overhead lines would be permitted but only where they would not cause unacceptable harm to visual amenity or landscape character. The Authority has noted that there is an incorrect reference to Policy 'CE-D7 Satellite Antennae' instead of AC-D7 in the Schedule of Proposed Changes, and will include a minor modification to correct this.

## 8 SECTION 8 Achieving Enjoyment for All & SECTION 9 Achieving Accessibility for All

Question 5.8: Are the policies in these sections of the Plan sound in all other respects, are they effectively drafted to achieve their intended purpose, and do they provide a clear indication of how a decision-maker should react to a development proposal?

- 8.1 The Authority is satisfied that, with the proposed changes in the Schedule ([SD5](#)) and subject to further changes identified in the written statements for soundness, the Plan is sound in all other respects and provides a clear indication of how decisions will be made in response to development proposals.

## 9 Appendix 1: Topic meeting – Exmoor National Park LDF

### Core Strategy and Development Policies

#### TOURISM: 23.11.10

##### **Visioning and Objectives: TOURISM**

- Economic viability is important.
- Conservation and enhancement.
- Diversity of provision.
- Sympathetic to the environment.
- Inclusion – everyone made to feel welcome.
- High quality.
- Affordable.
- Accessible.
- Adaptation to:
  - climate change scenarios and
  - market trends.
- Accountability – who is responsible? Need to make sure tourism providers stay on track if/when change occurs.
- Do not get rid of the reason why people come to Exmoor – well managed countryside, moorland etc.
- Vision for Exmoor - tranquillity, wildness, inspiration.
- What is special about Exmoor? Landscape, history, wildlife, communities etc.
- Aim to get the balance right –successful, viable businesses but not at the cost of Exmoor’s special character.
- Exmoor’s position in relation to its main tourism markets (where are people coming from?).
- Balance the needs of rural areas and settlements – can’t have a one policy fits all.
- Provision for young people that live in the area:
  - Recreation needs.
  - Maintaining skills and employment.
- Improve communications (mobile phone and broadband) and transport (including
- Need for integration –of tourism policy on other aspects of life.
- Impact of Hinkley Point development on the availability of visitor accommodation in the medium term.
- Education / purpose of the National Park.

**Group 1** (Jackie Smith, Exmoor Society; Steve Briggs, Smiths Gore/Crown Estate; Graham Townsend, North Devon Council; John Carter, Somerset Tourism; Martin Glaister, Exton House Hotel)

**Questions: There is a need to provide for a range of accommodation types within the National Park to cater for the differing needs of visitors. There appears to be a good range across Exmoor with some excellent small hotels, guest houses and bed and breakfast establishments as well as camping and caravanning sites, camping barns and youth hostels. Evidence indicates that the demand for hotels from visitors is falling.**

**a) Are there circumstances in which a hotel should be able to change use?**

- Conversion should be allowed to change back to non-guest accommodation – if it was a house originally it could change back – but those built as hotels should remain as hotels.
- Viability should be the bottom line.

**b) When is it acceptable to ‘lose’ a hotel and what should be used to test its viability?**

- Evidence needed with regard to the scale and potential adaptation (the way the space is utilised or additional provision) of the building and accessibility.

Checklist required:

- What safeguards can be conditioned to alternative uses so it can change temporarily?
- Potential for alternative uses or partial change of use to support the hotel business?
- Has business support been utilised?
- Are grants available?
- Are there other facilities in the settlement/area (is it the last hotel)?
- Long term viability – how is the current situation funded? How do we buck the current market?
- Character of the building.
- The business’ contribution to the local economy.

**c) What uses should be considered for hotels which are proven to be unviable? Should there be different approaches for different circumstances such as location?**

Alternative uses:

- Adapt hotels to apartments – condition marketing of rental for visitors when not in use as hotel – greater flexibility.
- Partial change of use to retain part of the hotel.
- Sale of part of the asset to improve viability – use S106 legal agreements to invest in the remaining asset (hotel).

- More sustainable to convert to residential in settlements – not in the open countryside.
- How can we best use the building to meet long term objectives? Invest increased profits from conversion to open market to supply more suitable affordable housing.
- Tourism is changing – losing bed-spaces through closure of hotels – need to look at where the market is and replace bed spaces.
- Release surplus (hotel accommodation) stock to reinvest in affordable housing.
- Positive support for community infrastructure investment.

**d) Are there areas where hotels should be retained? What criteria should be used to inform such decisions?**

- Purpose built hotels in the open countryside should be retained.

**Feedback from the room:**

**Question 1**

- Need to safeguard against people purchasing hotels and then wanting to change the use to a private house.
- Need to ensure that there are a number of stages to go through before a change of use can be permitted.
- Any business can be made ‘apparently’ unprofitable – need a viability assessment on a professional basis and be prepared to defend refusals. Expertise needs to be available to assess viability. Also need to look at how to make the business viable and if it has reasonable prospects of remaining viable.
- Issue of scale – a large country house hotel is different to a small guest house – this needs to be reflected in policy. When is a hotel a hotel – how do you establish this?
- Need to think about the future of tourism and the impact of hotel closures on the local economy.
- People have also moved to the area and started to provide guest accommodation in their properties (small-scale B&B/guest house type provision).
- Local Development Orders can ensure that in certain areas, there is some flexibility between operating as residential or guest house accommodation.
- Long term hotels (where the original building has been extended and adapted to become a hotel) or those built as hotels should remain.

**Group 2** (Mrs Pauline Clarke; Karin Taylor, National Trust; Ben Parkinson, Visit Devon; Meryl Salter, Glen Lodge B&B; Suzette Hibbert, Lynton & Lynmouth Town Council)

**Questions:**

**a) Short stay breaks are becoming more popular, should guest houses/B&Bs including through change of use from residential be encouraged? What are the advantages and disadvantages to such an approach?**

- The short-stay break is on the increase and the two week holiday is no more.

Advantages:

- Needs to be flexible (able to revert back) if originally private accommodation – reinstatement is good for the building.
- Criteria need to stop return to private accommodation from B&B – this could be when the scale of the enterprise reaches the level when fire regulations/licences are required (e.g. a threshold of 6 or more letting rooms). Currently Visit Britain classifies a B&B as having 3 letting rooms and a guest house as 4 or more rooms.
- A minimum number of rooms should trigger a review/application.

Disadvantages:

- Move towards becoming a business - tax implications.
- Impact on ancillary/support services.
- Potential for increase in second homes, if the B&B/Guest House reverts to private accommodation (less benefit to the community).
- Impact on the local economy.
- Impact on quality - potential for failed businesses.

**b) Currently, new holiday lets are permitted through conversion in the three larger settlements and as farm diversification only. Should new self catering units or holiday lets through change of use/conversion be encouraged in other locations or circumstances?**

- Yes - Especially if it is of benefit to the building and already non-residential and not suitable for local needs housing etc. Sympathetic conversions would be a benefit to disused buildings.
- The market for self-catering would be self-regulating.
- Market-led (based on evidence) – the cost of conversion/investment required means that this type of development is less likely to be speculative.
- Farmstead or hamlet (location).

**c) Currently, existing holiday let ties can be replaced with a local needs tie (affordable housing) to provide an alternative use and help contribute to the stock of affordable housing within the National Park. Given the level of need for affordable homes on Exmoor, if existing self catering units become housing for local needs should there be the potential to have a dual permission for affordable housing and holiday let so that it can change back to holiday let**

**(without the need for a further planning application)? What are the advantages and disadvantages of this approach?**

- A minimum time frame of 12 months should be required for each type of use to reduce the negative impact on tenants if they are required to move.
- Flexibility – but still retained for ‘local needs’.
- Keeps communities viable – full demographic mix.
- General – policies need to be responsive to changes in market forces.

**Feedback from the room:**

**Question 2 (a)**

- In some areas there is a glut of bed-spaces available – need to take that into account regarding change of use e.g. assessing the need for accommodation in the area.
- Need to have a clear threshold where a property becomes a business/employment use and is then protected under policy. A smaller establishment would not require planning permission to become a B&B/guest house.

**Question 2 (b)**

- In North Devon if an applicant applies to change the use of a holiday let, the fall back is local need affordable housing (as in the National Park) – not open market housing. This has been successfully defended at appeal.
- Can holiday lets be extended to short-term lets? Holiday lets are usually no more than 28 days in any calendar year by any one person. If holiday lets are not regulated in this way, they are likely to become second homes.

**Question 2 (c)**

- Local need could also apply to key workers.
- Flexibility is wanted as the current policy approach does not allow self-catering holiday lets to change back if they transfer to a local need tie. This approach may help to keep communities and businesses viable and thriving where opportunities can be maximised.
- The word ‘affordable’ may put people off – a negative perception. Perhaps ‘local need’ should be used instead.
- Policies need to be responsive to changes in the market.
- Helps to have a year round use of buildings, but also need to ensure some degree of permanency for people in local housing need.
- A degree of flexibility is good for people in emergency housing need – it is difficult to get the policy right.
- Opportunity to break new ground.

### Lyn Association of Commerce & Tourism comments via e-mail:

Is there any necessity for viability tests - please cut the Red Tape?

Why have viability tests for hotels/B&B's converting at all?

What are the viability tests for converting from a residential house to a hotel/B&B - NONE! Why?

Visitor numbers have declined significantly in the past 30 years and currently remain static at best.

Exmoor suffers from an already substantial oversupply of bedspace in both serviced and now self-catering accommodation.

ENPA state that hotels/B&B's create employment for local people? Is this true today?

Hotels/B&B's struggle terribly to find any 'local' people due to benefit dependency culture here.

Big hotels/B&B's prefer to employ reliable overseas workers.

**Group 3** (Peter Thorn, Canoe England; Susan May, Exmoor Trust; Ann Piper, Exmoor House Guest House; Tricia Vellacott, Springfield Farm B&B; Margaret Rawle, Winsbere House B&B)

### Questions:

**a) Are there other types of accommodation which trends indicate are needed on Exmoor?**

- More youth hostels are needed – especially for larger groups. This type of facility would also encourage young people to experience Exmoor and come back.
- Need to recognise that there are different groups of people holidaying on Exmoor at different times of the year depending on the type of holiday/activity they want.
- Separate staff accommodation is sometimes needed so that bedspace can be maximised in the hotel / guest house.
- There is also a severe lack of accommodation suitable for disabled/less-abled visitors.

**b) The provision of relatively low cost accommodation is important for attracting a wider range of groups, younger people and families. Should new camping and camping barns be encouraged? If so where are they needed? What about year round camping where the tents can be permanent structures linked to services such as electricity and mains water? What issues need to be considered?**

- More camping barns are needed – but still need quality – young people expect to have hot showers available and even wi-fi.
- Low cost – but still good quality (difficult with Visit England grading).
- Should be 'value' rather than low-cost.
- Wider range of accommodation for families and young people – youth hostels or similar.
- Affordability covers everything at all grades – including niche markets.
- Visitors are expecting 'deals' as well as the 'icing on the cake'.



**c) The pattern for tourism is changing and there is an encouraging increase in the length of the season in some types of tourism. Is this trend likely to continue and how should year round tourism be encouraged through planning policy?**

- Need to have more information and organisation for people – many visitors like activity weekends – where they know exactly what they will be doing over 2-3 days i.e. Exmoor Food Festival, Rutting Weekends, Safari's etc.
- Extending the season – need more events such as the Food Festival.
- Local accommodation providers cannot cope with the demand from the Iron Man weekend.
- More information is now available online – e.g. webcams on rivers and coasts so canoeists and surfers can make informed decisions – leads to more last minute breaks.
- Also need greater co-ordination with public transport times to allow people the time to explore places.
- Country sports have a large part to play in the winter in utilising visitor accommodation.
- Other places are not so busy in the winter and appear closed, so people are less inclined to stop – e.g. Dunster and Lynton & Lynmouth.
- More information needed online regarding availability of accommodation - B&Bs like more personal contact so they get to know people that will be staying with them.

**d) What are the likely changes and trends in tourism over the next 15- 20 years?**

- Need greater coverage for mobile phones and broadband – companies need to invest in this area. Changing lifestyles mean that more people want to stay in touch while they are away.
- Families with young children – more family activities are required – like the Exmoor Pony Centre and the Owl and Hawk Centre – they still need to be affordable. NOT theme-type parks – need to be Exmoor themed and low-key visually. There also needs to be some undercover/indoor areas for wet days.
- Accommodation providers need more information on:
  - Where to access grants.
  - New regulations and their impacts.
  - Business support.
- Visitor Centres and National Park Centres are essential – a business support network for accommodation providers. There could be more events and activities in the centres such as the Exmoor Awareness days.
- More flexibility for other activities for young people.
- People moving to the area as a lifestyle choice have to be entrepreneurial to make a business work.

- Need flexible policies to encourage businesses – such as re-utilising empty buildings.
- Issue of additional costs the accommodation provider incurs need to be considered - i.e. cost of business rates affects the cost of visitor accommodation.
- Issue with some of the roads (bottlenecks/pinch points) put many people off. Sat-navs also send people on inappropriate minor roads to some destinations.
- People want to eat local produce when they are on holiday. The local food/drink market is important to the local economy.
- Activities like canoeing bring money into the local economy (figures are available for areas such as Dartmoor / River Dart where canoeists can access a considerable stretch of the river) however more opportunity is needed on Exmoor – the East Lyn could be considered to be the best white-water in England.

■

**Feedback from the room:**

**Question 3:**

- What about recent trends such as ‘glamping’ (wigwams/yurts) – these are semi-permanent structures – are they appropriate for Exmoor?
  - Need to consider that they will have a footprint and a visual impact.
  - They are self-catering units with a different name.
  - More affordable accommodation.
- There is a whole market for younger people and outdoor activities, but there are no accommodation facilities available which are affordable for young groups. Worth doing more research – a lot of groups visit the area.
- Only two youth hostels in the National Park – there is also the Pinkery Outdoor Education Centre owned by the National Park Authority.
- There are also two camping barns run by the Youth Hostel Association at Roadwater and Dulverton.

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**Lyn Association of Commerce & Tourism comments via e-mail:**

Exmoor's season is longer, Easter to October, than traditional resorts such as Woolacombe - July Aug Sep, but it is coming under ever increasing pressure.

From November to Easter as a visitor destination Exmoor lacks appeal without a major sizable all-weather attraction.

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