

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)

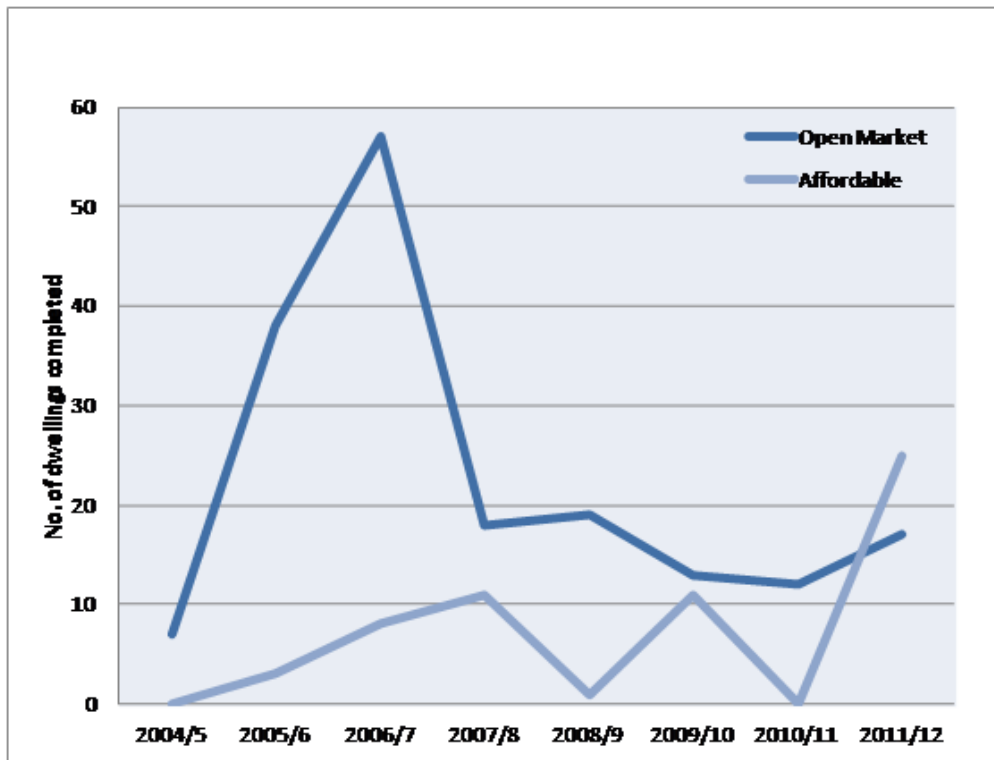


Figure 7.1 Housing Completions 2004-2012: Breakdown of Open Market and Affordable Dwellings

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/>.)

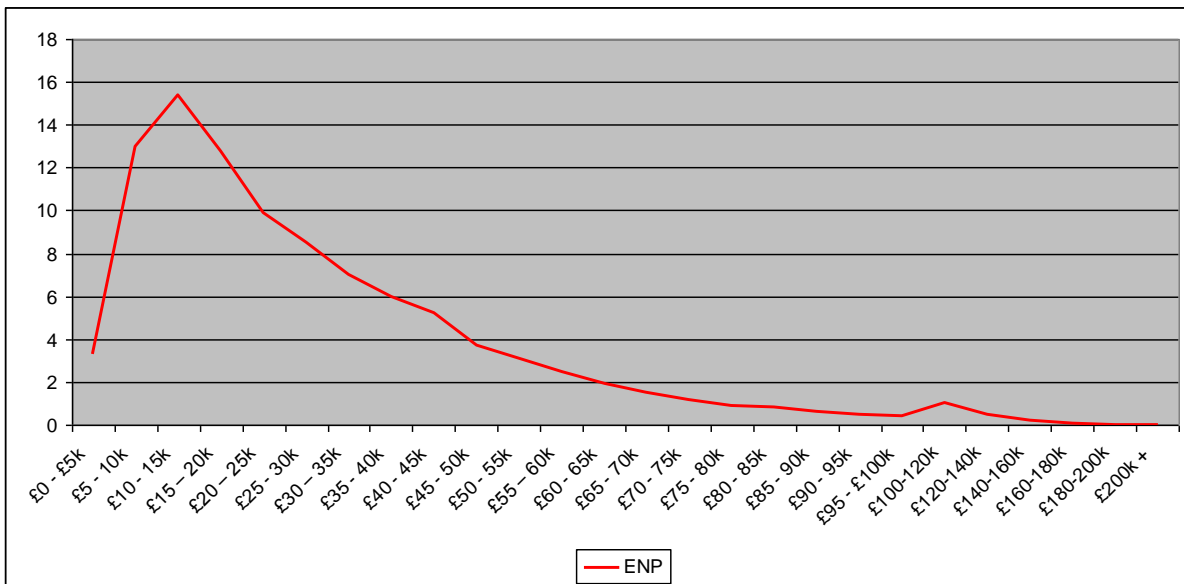


Fig 7.2: Gross Household Income, Exmoor National Park in West Somerset, Income Bands by Percentages, September 2013³²⁴

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.**