

Exmoor National Park Local Plan 5-Year Review: National Policy Checklist

The following table uses, as its basis, the Planning Advisory Service (PAS) Local Plan Form and Content Checklist which provides a guide to the content and form of local plans as set out in the National Planning Policy Framework (NPPF).¹ PAS advises that the toolkit can be used to inform Local Plan review and the decision on whether or not local plan policies need to be updated:

- To consider whether the development plan still meets current NPPF requirements.
- To identify which policy and document addresses the requirement in column C or identify why it is not relevant.

The Exmoor National Park Local Plan 5-Year Review has also considered National Planning Practice Guidance (PPG). PPG provisions related to Rural Exception Sites for affordable housing have been incorporated in the table.

The Adopted Exmoor National Park Local Plan was examined after the publication of the 2012 NPPF therefore this review has focused on those aspects of the NPPF which have changed since 2016/17.

As national policy, the NPPF necessarily applies to a range of different local plan areas with very different local circumstances.

Exmoor's designation as a National Park provides justification for diverging from national policy where it is considered to be in conflict with National Park statutory purposes and the National Park Authority's local socio-economic duty.

Additionally, NPPF provisions for rural areas are most likely to be relevant as the whole of Exmoor National Park is designated as a rural area. Rural areas are not homogeneous and Exmoor's remoteness (as well as its National Park designation) mean that some aspects of national policy for rural areas may not always be appropriate to Exmoor's local circumstances.

Importantly, national policy specifically for National Parks is also set out in *The English National Parks and the Broads: UK Government Vision and Circular 2010* (see footnote 59 to para 176 of the 2021 NPPF) The UK Government Vision and Circular is unchanged since adoption of the ENP Local Plan.

The schedule is colour coded to help identify new or revised NPPF requirements since the adoption of the plan:

Key:

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| New plan-making requirement of the NPPF 2019 and/or NPPF 2021 not contained within the previous 2012 version |
| Revised plan-making requirement of the NPPF, containing some changes from the 2012 version |
| Requirement of the NPPF which has not changed from the 2012 version in relation to plan-making |

¹ Local Plan Route Mapper Toolkit Part 2

| A. NPPF Requirement | B. NPPF Paragraph Reference | C. Assessment results |
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| <i>General Requirements</i> | | |
| Include any relevant material that is set out in a government policy statement(s) for the area for example a national policy statement(s) for major infrastructure and written ministerial statements. | NPPF Para 5, 6 | The English National Parks and the Broads: UK Government Vision and Circular 2010 is national policy specific to National Parks and the Broads (footnote 59 to para 176 of the 2021 NPPF) The Vision and Circular is unchanged since adoption of the ENP Local Plan. |
| Contribute to the achievement of sustainable development and the UN Sustainable Development Goals. | NPPF Para 7, 8, 9, 16 | Policy GP1: Achieving National Park Purposes and Sustainable Development defines sustainable development in the context of the National Park as development which will be consistent with its statutory purposes, the NPA legal duty, and the Sandford Principle and which will not conflict with the Plan’s vision and objectives. The policy includes criteria to guide development which must take opportunities to contribute to the sustainable development of the area. |
| Apply the presumption in favour of sustainable development. | NPPF Para 11 | Paragraph 3.9 of the Plan notes the presumption in favour of sustainable development – which was introduced in the 2012 NPPF against which the plan was tested at examination. Paragraph 3.11 explains that the National Parks’ statutory purposes, together with the duty, broadly reflect the three dimensions of sustainable development in the NPPF. Policy GP1: Achieving National Park Purposes and Sustainable Development brings the statutory purposes and sustainable development principles together setting out criteria to ensure that new development is consistent with National Park purposes and defining sustainable development in Exmoor National Park. Paragraph 3.12 explains that this approach is consistent with the NPPF presumption in favour of “sustainable development” and indicates where development should be restricted as set out in the 2012 and 2019 NPPF (footnote 6 to paragraph 11 relating to the presumption in favour of sustainable development). |

| A. NPPF Requirement | B. NPPF Paragraph Reference | C. Assessment results |
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| Provide a positive vision for the future; a framework for addressing housing needs and other economic, social and environmental priorities. | NPPF Para 15 | A positive vision for Exmoor National Park to 2031 is set out on pages 13-15 of the Local Plan. It provides a framework for addressing housing needs and other economic, social and environmental priorities. |
| Plans should be: Aspirational and deliverable Contain clear and unambiguous policies Accessible through the use of digital tools Serve a clear purpose avoiding duplication | NPPF Para 16 | The Local Plan sets out a clear, aspirational, and deliverable vision for Exmoor National Park to the year 2031. Strategic and development management policies aim to address the priorities around development, land use and conservation and are clear and unambiguous. The Local Plan Vision for Exmoor National Park on pages 13-15 provides a framework for economic, environmental and social priorities, including addressing local housing needs. The Local Plan can be accessed digitally online either wholly or in sections, along with the policies map. A Local Plan policies summary is also available online. ² |
| <i>Plan Content</i> | | |
| Include strategic policies to address priorities for the development and use of land. They should set out an overall strategy for the pattern, scale and design quality of places. | NPPF Para 17, 20 | The Local Plan contains strategic policies to address priorities for the development and use of land. They set out an overall strategy for the pattern, scale and quality of development including through Policy GP1: Achieving National Park Purposes and Sustainable Development; GP3: Spatial Strategy; CE-S1 Landscape and Seascape Character; CE-S6 Design and Sustainable Construction Principles; HC-S1 Housing and SE-S1: A Sustainable Exmoor Economy. |
| Outline which policies are 'strategic' policies | NPPF Para 21 | The numbering and formatting of plan policies distinguishes them from more detailed 'DM' policies. Paragraph 1.29 of the Introduction explains the purpose and method of distinguishing the strategic from other policies in the Plan. |

² Exmoor - Local Plan to 2031 (exmoor-nationalpark.gov.uk)

| A. NPPF Requirement | B. NPPF Paragraph Reference | C. Assessment results |
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| <p>Strategic policies should look ahead over a minimum 15-year period <u>from adoption</u>. Where larger scale developments are proposed that form part of the strategy for the area, policies should be set within a vision which looks further ahead (at least 30 years).</p> | <p>NPPF Para 22, having regard to the transitional provisions at NPPF para 221</p> | <p>The Plan period (including strategic policies) is to 2031. Although, adoption in 2017 means the plan period is one year less than the 15 years set out in the NPPF this is not considered to be significant particularly in a National Park in a remote rural area where development levels are low. In practice, the vision and approach were, in any case, framed to take a long term view of the development needs of the area in the context of its conservation and enhancement and the socio-economic needs of local communities. Criteria-based policies apply a flexible approach to enable response to change. Affordable housing delivery is subject to monitoring throughout the plan period through Policy M1-S1: Monitoring and Review of Affordable Housing Need and Provision - the need for a review of reasons/and ultimately a review of the Plan can be triggered in certain circumstances set out in the policy.</p> |
| <p>Indicate broad locations for development on a key diagram, and land use designations and allocations on a policies map.</p> | <p>NPPF Para 23</p> | <p>The Local Plan contains a Key Diagram (map 3.1) land use designations and land for safeguarding are included on a policies map. There are no Local Plan allocations.</p> |
| <p>Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period.</p> | <p>NPPF Para 23</p> | <p>Policy GP1: Achieving National Park Purposes and Sustainable Development ensures that new development is consistent with National Park purposes and defines sustainable development in Exmoor National Park. Paragraph 3.12 explains that this approach is consistent with the NPPF presumption in favour of “sustainable development” which indicates where development should be restricted (para 11, footnote 6). The presumption in favour of sustainable development was introduced in the 2012 NPPF and was therefore considered through the ENP Local Plan examination.</p> <p>The housing strategy set out in Policy HC-S1: Housing and associated housing policies, provides a coherent policy framework that is based on addressing the needs of the local community in line with National Park purposes, the NPA duty to local communities and the National Parks and the Broads Vision and Circular. The strategic approach to housing was developed from a wide range of evidence that took account of the OAN (explained in paragraphs 6.26-6.29 of the plan) affordability and local housing need.</p> |

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| | | <p>The Local Plan housing strategy is to deliver local needs affordable housing without a target (or “housing requirement”) or allocations. Instead, the Local Plan contains an affordable housing “indicative figure”. Policy HC-S1: Housing says that new housing will be delivered “exceptionally” as the strategy is based on a needs led rural exceptions approach (consistent with the rural exceptions approach in the NPPF).</p> <p>Housing delivery will respond to identified local housing need using up to date evidence in parish housing need surveys. This is explained in paragraphs 6.30-6.38 of the plan.</p> <p>Policy M1-S1: Monitoring and Review of Affordable Housing Need and Provision ensure that the indicative figure and housing permissions/delivery are monitored. It includes provisions to trigger a review in certain circumstances.</p> <p>The Local Plan housing strategy was tested at examination against the 2012 NPPF (including paragraph 47 on OAN - the evidence base should be used to ensure that Local Plans meets the full, objectively assessed needs for market and affordable housing in the housing market area, including identifying key sites which are critical to the delivery of the housing strategy as far as is consistent with the policies set out in this Framework which is similar to paragraph 23 of the 2019 NPPF). The Local Plan was found sound.</p> |
| <p>Include non-strategic policies to set out more detailed policies for specific areas.</p> | <p>NPPF Para 18, 28</p> | <p>The Local Plan contains non-strategic policies (more detailed development management policies). The numbering and formatting of these policies distinguishes them from the strategic policies. Paragraph 1.29 of the Introduction explains the purpose and method of distinguishing the different policies in the Plan.</p> |
| <p>Set out contributions expected from development, and demonstrate that expected contributions will not undermine the deliverability of the Plan.</p> | <p>NPPF Para 34, 58</p> | <p>See GP5 (and paras 3.533.56) and HC-D2</p> <p>A Local Plan Viability Study was prepared as part of the evidence base for the Local Plan. Planning obligations are generally used within the National Park to secure local need affordable dwellings. They may also be used to ensure new infrastructure required to unlock development opportunities is delivered; to secure contributions towards the provision of affordable housing; or set the level of</p> |

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| | | <p>Principal Residence housing where cross-subsidy is required. Circumstances where planning obligations are used will vary on a case-by-case basis</p> <p>The focus on securing local need affordable housing is provided through Policy HC-S1 – Housing - that new housing development will be permitted where it addresses a local identified housing need. There is no provision for housing solely to meet open market demand. As such, the contributions expected from development within the National Park do not undermine the deliverability of the plan.</p> <p>Policy GP5 – Securing Planning Benefits sets out that planning obligations will be required where reasonable, necessary and appropriate to ensure development can be made acceptable, be brought in line with policy objectives and to address infrastructure capacity. Policy HC-D2 Conversions to Dwellings in Settlements sets out the circumstances when, through the change of use of a building to dwellings, a financial contribution may be sought in lieu of on-site contribution to affordable housing. These occasions are expected to be exceptional as needed affordable housing will be expected to be provided on site. Exceptionally, if it can be demonstrated that on-site provision of affordable housing through change of use is not possible or appropriate, a financial contribution will be considered in lieu of the required affordable housing. E.g. where the scheme would provide more affordable homes than are needed to be used towards affordable housing needed elsewhere within the National Park (para 6.99) In such cases, it will at minimum be of an equivalent value to the affordable housing that would have been provided on site The level of any financial contribution will be based on viability evidence using an ‘open book’ approach</p> |
| <p>Local Plans and development strategies are examined to assess if they have been positively prepared, justified, effective and consistent with national policy.</p> | <p>NPPF Para 35</p> | <p>The Local Plan was considered against these tests through the Plan examination. The Local Plan 5-Year Review has assessed the plan against a number of factors including changes to national policy</p> |
| <p><i>Housing</i></p> | | |

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| <p>Be informed by a local housing need assessment, conducted using the standard method in national planning guidance as a starting point. Any housing needs which cannot be met within neighbouring areas should also be taken into account when establishing the amount of housing to be planned for within the plan.</p> | <p>NPPF Para 61</p> | <p>Policy HC-S1 reflects the area’s designation as a National Park, the duty to local communities and national policy in the National Parks Circular which says that Parks are not suitable locations for unrestricted housing and general housing targets are not provided for them and the expectation is that new housing will be focused on meeting affordable housing requirements.³ This Policy sets out the purpose of housing development in Exmoor National Park – exceptionally new housing development will be permitted where it addresses an identified local housing need for specific housing set out in the policy. Clause 3 says that provision will not be made for housing solely to meet open market demand.</p> <p>Local Plan para 6.32 contains an indicative affordable housing figure for the plan period. Policy M1-S1 says that this indicative figure should be reviewed on the basis of the latest available evidence by December 2020. A review of the figure has been carried out.</p> <p>NPPF Para 61 says the standard method in PPG should be used unless exceptional circumstances justify an alternative approach. National Park designation constitutes exceptional circumstances and a reason why the standard method may not apply. National planning guidance (PPG) says that where the data required for the model are not available such as in National Parks, an alternative approach will have to be used. Such authorities may continue to identify a housing need figure using a method determined locally but will need to consider the best available information on anticipated changes in households as well as local affordability levels.</p> <p>A review of the indicative figure using the latest available evidence has linked with work to review housing need using the standard methodology across the local authority boundary carried out jointly with neighbouring authorities as part of Duty to Co-operate. The standard methodology does not apply to areas in National Parks. Additionally, an updated local housing needs assessment was prepared for Exmoor National Park in 2021. The review has provided a lower but similar figure to that in the adopted Plan.</p> |

³ Paragraph 78 [National Parks Circular \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/442412/national_parks_circular.pdf)

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| <p>Identify the size, type and tenure of housing needed for different groups.</p> | <p>NPPF Para 62</p> | <p>HC-S1 reflects the NPA legal duty to local communities “Exceptionally, new housing will be permitted where it addresses an identified local housing need” – this is the group of people the Plan policies seek to address the needs of. Specifically, the policy identifies this as:</p> <ul style="list-style-type: none"> - affordable homes for local persons in proven housing need in accordance with the local occupancy definition (HC-S3) - rural workers in agriculture, forestry and other rural land-based enterprises with a proven, essential, functional need in accordance with HC-D9; or - to enable succession farming on established farm businesses in accordance with HC-D10 - for Extended Families (HC-D5) <p>HC-S2: A Balanced Local Housing Stock taking account of the existing stock, new residential development should contribute to creating sustainable, balanced and inclusive communities and meet the needs of present and future generations through a mix of dwellings (size, type and tenure) It applies Building Regulations requirements M5(2) for accessible and adaptable dwellings and M4(3) for wheelchair user dwellings.</p> <p>HC-S4: Principal Residence ensures that open market dwellings permitted within the overall housing strategy will be limited to occupations by people as their principal (sole or main) residence.</p> <p>HC-D6: Custom/Self Build Local Need Housing enables for households with a local affordable need to provide their own home.</p> <p>A local housing needs assessment using the latest available evidence has been carried out jointly with neighbouring authorities. Additionally, an updated local housing needs assessment for Exmoor National Park was prepared in 2021. The reviews have updated evidence on the needs of households/ different groups.</p> |
| <p>Where a need for affordable housing is identified, specify the type of affordable housing required.</p> | <p>NPPF Para 63</p> | <p>The Local Plan housing policies, including strategic policy HC-S1 Housing, specify that new housing should address the needs of local communities and should be occupied by people in local housing need in perpetuity. Policy HC- S2 A Balanced Local Housing Stock specifies that new residential development should, in terms of size, type and tenure, meet the needs of present and future</p> |

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| | | <p>generations The supporting text to the affordable housing policies (including paras 6.34-6.38) specifies how local housing need will be identified to justify delivery of new affordable housing through a rural exceptions approach. Para 6.36 says that parish housing need surveys provide information on the number of affordable housing that is needed as well as information on size, type and tenure and this will inform the size, type and tenure of affordable housing proposals that come forward.</p> |
| <p>Expect at least 10% of the total number of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups. A minimum of 25% of all affordable homes should be First Homes, subject to the transitional requirements set out in the Planning Practice Guidance.</p> | <p>NPPF Para 65</p> | <p>Most new housing development in ENP is single dwellings or on small sites of under 10 dwellings where this NPPF policy would not apply as it is not major development. Even for schemes of 10 or more houses, sites in ENP are exempt from this national policy because they are rural exception sites which the NPPF exempts. The rural exceptions approach underpins the Local Plan housing strategy including Policy HC-S1 Housing (particularly clauses 1, 1a) and 3). The policy requires that all new housing should meet a local community need. It prioritises affordable housing for people with a local connection through a rural exceptions approach without a Plan housing target or site allocations. HC-S1 and other Plan affordable housing policies enable new owner-occupied local need housing to come forward including through self/custom build where there is evidence of a local need for it.</p> |
| <p>Set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.</p> | <p>NPPF Para 66</p> | <p>There is one neighbourhood plan in Exmoor National Park for Lynton and Lynmouth parish (The Lyn Plan) adopted in 2013 prior to the adoption of the ENP Local Plan in 2017. The Lyn Plan contains four housing policies of which two were considered to be in conflict with the Local Plan. The Local Plan policies have superseded these two housing policies and are the development plan policies which proposals should be determined in accordance with unless material considerations indicate otherwise. The other two Lyn Plan housing policies relate to Affordable Housing and Local Connection and they seek to achieve the same objectives as the Local Plan housing policies - based on a needs led rural exceptions approach to the delivery of housing without a target or site allocations as explained above. In all cases the Local Plan is clear that parish housing needs surveys will be the basis for</p> |

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| | | <p>identifying local housing need (paras 6.37-6.38). It would therefore be inappropriate to set out a specific housing requirement for the designated neighbourhood area.</p> <p>Additionally, para 6.28 of the Local Plan explains that provision to meet the need identified for the part of North Devon in Exmoor National Park, is included in the North Devon and Torridge Local Plan housing requirement to be met in North Devon outside the National Park.</p> |
| <p>Identify a supply of specific, deliverable sites for years one to five of the plan period, and specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.</p> | <p>NPPF Para 68</p> | <p>The Local Plan strategy seeks to ensure the delivery of local needs affordable housing. Policy HC-S1: Housing says new housing will be delivered “exceptionally” as the strategy is based on a needs led rural exceptions approach to the delivery of housing and without site allocations. This is consistent with the “Rural Housing” section of the NPPF (paragraph 78) which relates to rural exception sites. The supporting text to the Local Plan policies explains the approach to deliver sites for affordable housing.</p> <p>While there have been changes to the NPPF since adoption of the ENP Local Plan in 2017, NPPF paragraph 68 is not entirely new. Paragraph 47 of the 2012 NPPF said sites should be identified for years 1 to 5 and years 6 to 10 and potentially years 11-15 “.</p> <p>The Local Plan policies were tested at examination against national policy including the equivalent 2012 NPPF paragraph which has not changed significantly. The examination assessed the housing strategy to use a needs led rural exceptions approach, an affordable housing indicative figure rather than a housing target and no site allocations and the Local Plan was found sound.</p> |
| <p>Identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare; unless it can be demonstrated that there are strong reasons why the 10% target cannot be achieved.</p> | <p>NPPF Para 69</p> | <p>In a remote rural area such as Exmoor there are few suitable housing sites and most sites are small, some accommodating one or two houses. A needs led approach means that even where large sites come forward, affordable housing can only be permitted where it is needed (or housing needed to deliver the affordable housing). Key considerations in a National Park are to ensure that development is consistent with statutory purposes, as well as other development management considerations such as location. The Local Plan strategy (Policy HC-S1) is to deliver local needs affordable housing without site allocations which are not consistent with the rural exceptions approach. Although most housing is likely to be delivered on sites of one hectare or less, it would nevertheless be inappropriate to</p> |

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| | | quantify the percentage of needs led affordable housing that should be on sites of one hectare or less. Sites come forward in response to identified need and, for the reasons above the 10% target would not be appropriate. |
| Support the development of entry level exception sites, suitable for first time buyers, unless the need for such homes is already being met within the authority's area. | NPPF Para 72 | There are additional elements to NPPF paragraph 72 which mean that entry-level exception site should not be supported in Exmoor National Park: “These sites should be on land which is not already allocated for housing and should: b) ...not compromise the protection given to areas or assets of particular importance in this Framework. Footnote 36 refers to areas where entry-level exception sites should not be permitted including in National Parks. |
| Support the supply of homes through utilising masterplans, design guides and codes where appropriate to support larger scale developments. | NPPF Para 73 | There are very few large developments in Exmoor. The Local Plan is for an area designated as a National Park and it therefore contains detailed design policies to ensure development conserves and enhances the natural beauty, wildlife and cultural heritage of the National Park. Additionally, the ENP design guide is being reviewed. |
| Include a trajectory illustrating the expected rate of housing delivery over the plan period, and requiring a buffer of 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan. | NPPF Para 74 | A needs led approach means that the housing that will be permitted will be only that affordable housing which is needed (or housing needed to deliver the affordable housing). Key considerations in a National Park are to ensure that development is consistent with National Park statutory purposes, as well as other development management considerations. The Local Plan strategy (Policy HC-S1) is to deliver local needs affordable housing without site allocations which are not consistent with the rural exceptions approach. Although most housing is likely to be delivered on sites of one hectare or less. Sites come forward in response to identified need and, for the reasons above a 5-year land supply and trajectory are not appropriate. |

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| Be responsive to local circumstances and support rural housing developments that reflect local needs. | NPPF Para 78 | The housing strategy set out in Policy HC-S1: Housing and associated housing polices provide a coherent policy framework that is based on addressing local needs. This is in line with the legal National Park Authority duty to foster the social and economic well-being of local communities and the Parks National and the Broads Vision and Circular. The strategy was based on evidence on affordability and local housing need. Affordable housing is delivered through a needs led approach in response to up to date evidence on the level of local housing need. |
| Identify opportunities for villages to grow and thrive, especially where this will support local services. | NPPF Para 79 | Policy GP3: Spatial Strategy and a range of other policies, provide opportunities for named settlements to grow and thrive. Para 3.29 explains that the overall aim of the spatial strategy is to ensure Exmoor’s communities are sustained over the longer term through appropriate development of a scale that is proportionate to their location and the socio-economic needs of their communities. Para 3.33 notes that the [named] settlements exist at a rural level beneath most conventional settlement hierarchies and that the three largest settlements in the National Park have populations below 1500. Most of Exmoor’s named settlements have populations of a few hundred or less and this approach means that there are, in principle, opportunities for appropriate growth to address local needs in all of Exmoor’s villages. Para 3.38 says that development in ‘Villages’ will help maintain or enhance their communities by providing for a diverse economy helping to retain and enhance key services and facilities and addressing the needs of local communities. |
| Avoid the development of isolated homes in the countryside unless specific circumstances are consistent with those set out in the NPPF. | NPPF Para 80 | <p>Policy HC-D8: New Build Dwellings in the Open Countryside provides for new housing to meet the proven needs of rural workers and for succession farm dwellings in accordance with the NPPF (which refers to housing for those taking majority control of a farm business)</p> <p>The plan includes HC-D9 Rural Workers and HC-D10 Succession Farming – Second Dwellings on Established Farms which set out criteria to guide development including tests for essential functional need. Policy HC-D9 also requires that dwellings are well related to existing buildings on the holding.</p> <p>Policy HC-D14 Subdivision of Existing Dwellings guides decisions on the subdivision of dwellings including those in the open countryside.</p> |

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| <i>Economy</i> | | |
| <p>Create conditions in which businesses can invest, expand and adapt.</p> | <p>NPPF Para 81</p> | <p>The pre-amble to Policy SE-S1 – A Sustainable Exmoor Economy encourages appropriate business development where negative impacts on the area are avoided, so that economic benefits of Exmoor’s high-quality environment can continue. It also says the Authority seeks to enable successful businesses to expand appropriately and to retain the important resource of existing land/buildings to ensure a supply of land for business use. Policy SE-S1 reflects Exmoor’s National Park designation and, consistent with national policy encourages development that will strengthen, enhance and diversify Exmoor’s economy. Policy SE-S2 - Business Development in Settlements enables business opportunities including through the re-use of existing buildings, new development and extensions. Policy SE-S3- Business Development in the Open Countryside encourages rural business development including diversification through the change of use and conversion of existing buildings where proposals are compatible with local landscape character.</p> <p>Policy SE-D1 – Home Based Businesses reflects the extremely rural nature of Exmoor and encourages home-working and appropriate home-based businesses. This policy gives appropriate opportunity for investment and for businesses to expand and adapt.</p> |
| <p>Set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.</p> | <p>NPPF Para 82</p> | <p>Policy SE-S1 – A Sustainable Exmoor Economy encourages sustainable business development including home working and employment, where development growth and intensification would not have unacceptable adverse impacts on local landscape character, heritage and wildlife. Policy SE-D2 – Safeguarding Existing Employment Land and Buildings seeks to safeguard existing employment premises and ensure a supply of sites for businesses. New business opportunities are encouraged through re-using previously developed land and new sites/buildings though Policy SE-S2 – Business Development in Settlements. Opportunities outside of settlements are provided for by Policy SE-S3 – Business Development in the Open Countryside while the high proportion of home-based working in the National Park is reflected in Policy SE-D1 – Home Based Businesses.</p> <p>A South West Local Industrial Strategy was published in late 2020 which includes all Local Authorities in Devon and Somerset along with both National Parks. It identifies broad aims for the heart of the</p> |

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| | | South West including ambitions for rural areas. The Strategy does not contain anything which specific which ENP Local Plan policies would conflict with. |
| Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period. | NPPF Para 82 | <p>Policy SE-S2 – Business Development in Settlements – seeks to maximise and encourage opportunities for business development in appropriate locations with a focus on the re-development of traditional buildings or new sites/buildings, preferably on brownfield land. Strategic sites for employment are not identified in the plan, as the scale of new employment development is small and because a criteria based approach provides flexibility for development to come forward as needed. Policies seek to strengthen and enhance the existing economy through growth, intensification and diversification with specific policies tailored to Exmoor’s economy such as SE-D1 – Home Based Businesses and SE-S4 – Agricultural and Forestry Development.</p> |
| Seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment. | NPPF Para 82 | <p>The rural nature of Exmoor and high proportion of home working and self-employment mean technological infrastructure is vital in supporting the viability and prosperity of many businesses. Policies AC-S4 – Electricity and Communications Networks, AC-D5 – Radio and Telecommunications Infrastructure and AC-D6 – Fixed Line Transmission Infrastructure seek to support improvements to communications infrastructure to support Exmoor’s communities and businesses. This includes supporting superfast broadband roll-out and mobile phone network improvements. Electronic communications infrastructure improvements are supported where development does not conflict with the National Park designation. In the first instance, development should seek to share existing infrastructure for this reason.</p> <p>SE-S2 – Business Development in Settlements provides for business development within named settlements (locations with existing provision of, or access to, a range of services and facilities). Focusing new employment sites in these locations helps in meeting community needs, diversifying the economy and support and enhance key services and facilities, as set out in Local Plan para 7.20.</p> <p>Exmoor has very high levels of self-employment and home working and c. 60% of businesses are micro-businesses. Policies seek to overcome barriers including infrastructure and electronic communications although the planning system cannot itself overcome all issues. The pre-amble to</p> |

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| | | <p>Policy SE-S2 – Business Development in Settlements (para 7.20) refers to development within settlements including the creation of rural enterprise hubs for home workers in order to overcome isolation and lack of networking opportunities. Building re-use and brownfield land is encouraged for new development.</p> |
| <p>Be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.</p> | <p>NPPF Para 82</p> | <p>Local Plan employment policies apply a criteria-based approach to business development without allocations to enable flexibility to respond to changes in economic circumstances</p> <p>Policy SE-D1 – Home Based Businesses accounts for residential use, extensions and ancillary buildings for home-based businesses providing there are no unacceptable adverse landscape or amenity impacts. Clause 3 encourages live-work units where employment and living areas can be used independently and in line with housing policies. Additionally, the pre-amble to Policy SE-S2 – Business Development in Settlements (para 7.20) says Policy SE-D2 seeks to encourage a range of new ‘B’ and other sui generis uses considered by the NPA to be business development including the creation of rural enterprise hubs for home workers to help support viability and business activity. Not allocating sites within the plan provides flexibility enabling the release of appropriate sites/buildings in response to needs and changing economic circumstances.</p> |
| <p>Recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.</p> | <p>NPPF Para 83</p> | <p>Economic development that conserves and enhances the National Park is encouraged. Specific policies recognise key economic sectors such as agricultural farming, food and tourism. Policy SE-S4 – Agricultural and Forestry Development, RT-S1 – Recreation and Tourism and HC-S6 – Local Commercial and Community Facilities provide for key sectors on Exmoor and aim to support, diversify and enhance consistent with Policy SE-S1 – A Sustainable Exmoor Economy. Policy SE-D2 seeks to encourage a range of new ‘B’ and other sui generis uses including the creation of rural enterprise hubs for home workers to help support viability and business activity.</p> <p>Development including e.g., large-scale storage or distribution operations would not be appropriate within the National Park.</p> |

| A. NPPF Requirement | B. NPPF Paragraph Reference | C. Assessment results |
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| <p>Enable the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings.</p> | <p>NPPF Para 84</p> | <p>Policy SE-S2 – Business Development in Settlements encourages utilising existing buildings and brownfield land in the first instance with opportunities taken for enhancement measures where appropriate. Policy SE-S3 – Business Development in the Open Countryside is encouraging of business development that can be accomplished through change of use, conversions, or extensions. New buildings in the open countryside are permitted where it is a redevelopment, enhancement or replacement of an existing site as development outside of this would be in conflict with the protection and conservation of an important, nationally designated landscape.</p> |
| <p>Enable the development and diversification of agricultural and other land-based rural businesses.</p> | <p>NPPF Para 84</p> | <p>Policy SE-S4 – Agricultural and Forestry Development provides for new and replacement buildings, tracks, structures and extensions for agriculture or forestry purposes where there is a functional need.</p> <p>Policy SE-S3 – Business Development in the Open Countryside enables development in the countryside including farm diversification which helps support the land-based business.</p> |
| <p>Enable sustainable rural tourism and leisure developments which respect the character of the countryside.</p> | <p>NPPF Para 84</p> | <p>Policy RT-S1 – Recreation and Tourism provides opportunities for recreation and tourism which enables understanding and enjoyment of the Park’s special qualities. Development should be sustainable and compatible with the quiet enjoyment, scale and setting of the Park with no unacceptable adverse impacts on the national and historic environment, either individually or cumulatively. This is in line with national policy in the National Parks Circular ‘sustainable tourism contributes to Park purposes, particularly that of promoting opportunities for the understanding and enjoyment of the special qualities of Parks by the public’ and ‘properly managed tourism can bring a range of benefits and help sustain communities, environments and ways of life but inappropriate tourism development or poorly managed visitor pressure can be damaging’⁴</p> <p>The Local Plan includes a number of policies for tourism and leisure related/recreation development. There are policies for serviced accommodation including Bed & Breakfast, Hotels, Guesthouses as well as non-serviced accommodation such as holiday cottages. Policies RT-D1 – Serviced Accommodation and RT-D4 – Non-Serviced Accommodation seek to encourage development</p> |

⁴ Paragraph 81 [National Parks Circular \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

| A. NPPF Requirement | B. NPPF Paragraph Reference | C. Assessment results |
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| | | <p>through conversions and change of use where they conserve the National Park. Policy RT-D3 – Safeguarding Serviced Accommodation seeks to safeguard existing serviced accommodation recognising their economic and social benefits for visitors and local communities e.g. through employment. Policy RT-D2 – Staff Accommodation provides for staff accommodation in hotels, guesthouses and hostels sectors.</p> <p>Provision is also made for camping, tents and caravans where they are acceptable and other plan objectives are met. Policy RT-D5 – Tented Camp Sites enables new small-scale tented campsites. Facilities on site should be provided through conversion or extension of existing buildings and environmental benefits are sought. Camping barn proposals are permitted under Policy RT-D6 – Camping Barns, where they conserve historic character, biodiversity interests and landscape setting. Policy RT-D9 – Alternative Camping Accommodation enables small-scale low impact camping proposals.</p> <p>New static caravan sites and chalet development is not appropriate within the National Park due to its adverse impacts on landscape. This is in line with national policy which seeks to enable sustainable rural tourism development that respect countryside character. However, as a small number of static caravan sites already exist, Policy RT-D8 – Static Caravan Sites encourages development that improves existing sites through high-quality sustainable replacement accommodation. New certificated sites can come forward within the park under Policy RT-D7 – Certificated Caravan and Touring Caravan Sites where they are well-sited and integrated with no adverse impacts on wildlife, landscape or historic environment.</p> <p>Policy RT-D10 – Recreational Development encourages development which supports the local economy where it will enable understanding and enjoyment of the National Park’s special qualities., preferably in named settlements although other locations can be considered</p> <p>RT-D11 – Equestrian Development can be permitted where there would be no adverse impacts and it is well-related to existing equestrian routes in accordance with RT-D12 – Access Land and Rights of Way.</p> |

| A. NPPF Requirement | B. NPPF Paragraph Reference | C. Assessment results |
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| <p>Enable the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.</p> | <p>NPPF Para 84</p> | <p>Policy CE-S6 Design and Sustainable Construction Principles ensures that development proposals must consider accessibility. 1e) says that the design and layout of development should have regard for improving safety, inclusivity and accessibility for those who live work and visit.</p> <p>Policy HC-S6 – Local Commercial Services and Community Facilities seeks to retain existing and provide for new local community services and facilities. HC-D18 Local Commercial Service Provision provides for local commercial services such as shops, and pubs.</p> <p>Policy HC-D19 Safeguarding Local Commercial Services and Community Facilities safeguards local services and community facilities from changes of use</p> <p>Policy SE-D2 – Safeguarding Existing Employment Land and Buildings seeks the retention of existing employment land and buildings unless they cannot be continued or made viable in the long term. Alternative uses can include community uses.</p> |
| <p>Recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.</p> | <p>NPPF Para 85</p> | <p>Policy SE-S2 Business Development in Settlements enables new business development in, and also well related, to named settlements</p> <p>Policy SE-S3 – Business Development in the Open Countryside enables business development outside settlements in the open countryside where it is well-related to an existing group of buildings on a farmstead or within a hamlet. New buildings in the countryside are permitted as redevelopment of existing sites or replacement of an existing building, both being consistent with the local landscape character. Stand-alone buildings which do not relate well to existing buildings or are not part of a farm group/hamlet are not permitted.</p> <p>Policy RT-D10 – Recreational Development encourages proposals that support a sustainable local economy. Development can be considered outside a named settlement where the location is essential, and it enhances the understanding and enjoyment of the special qualities of the National Park.</p> |
| <p><i>Town centres</i></p> | | |

| A. NPPF Requirement | B. NPPF Paragraph Reference | C. Assessment results |
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| <p>Define a network and hierarchy of town centres and promote their long-term vitality and viability.</p> <p>Define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations.</p> <p>Retain and enhance existing markets and, where appropriate, re-introduce or create new ones.</p> <p>Allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead.</p> <p>Where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre.</p> | NPPF Para 86 | These are not relevant within Exmoor National Park. |
| <p>Recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.</p> | NPPF Para 86 | <p>Local Plan policies seek to maximise opportunities for the delivery of locally needed affordable housing while ensuring that other Plan objectives are not compromised (SE-D2 Safeguarding Existing Employment Land and Buildings and HC-D19 Safeguarding Local Commercial Services and Facilities). Policy HC-S1: Housing sets out the overarching housing strategy and HC-D1 Vacant Buildings in Settlements, HC-D2: Conversions to Dwellings in Settlements and HC-D3: New Build Dwellings in Settlements provide detailed criteria to guide development including the appropriate reuse of</p> |

| A. NPPF Requirement | B. NPPF Paragraph Reference | C. Assessment results |
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| | | existing buildings, including commercial buildings and new build residential development on sites in the centre of settlements. |
| <i>Healthy and safe communities</i> | | |
| Achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible, and enable and support healthy lifestyles. | NPPF Para 92 | <p>A range of policies seek to ensure healthy, inclusive and safe accessible development/places which promote social interaction and healthy lifestyles. This includes Policy GP1: Achieving National Park Purposes and Sustainable Development to support the health and socio-economic wellbeing of local communities.</p> <p>Policy CE-S3 Biodiversity and Green Infrastructure aims to achieve the conservation and enhancement of wildlife and habitats. Paragraph 4.75 recognises that National Parks provide some of the best quality green infrastructure helping create a healthy environment for people, communities and businesses, and improving air and water quality.</p> <p>Paragraph 4.84 of the Plan explains that green infrastructure can provide a range of social and economic benefits for those who live and visit Exmoor. It is recognised that nature has a positive impact on mental and physical health and helps children’s learning. High-quality natural environments foster healthy communities, and green spaces encourage social activity.</p> <p>Policy GP3: Spatial Strategy aims to achieve thriving communities so they are economically resilient, environmentally sustainable, socially mixed and inclusive. Policy HC-S1: Housing and associated housing policies aim to ensure that all sections of the local community (including travelling communities) can access suitable housing in the National Park.</p> <p>Policy HC-S2: A Balanced Local Housing Stock states that new residential development will contribute towards the creation of sustainable, balanced and inclusive Exmoor communities by ensuring a mix of dwellings (in terms of size, type and tenure), that will meet the needs of present and future generations.</p> <p>Policy CE-S6 Design and Sustainable Construction Principles requires that development proposals must consider public safety, inclusivity and accessibility. 1e) says that the design and layout of</p> |

| A. NPPF Requirement | B. NPPF Paragraph Reference | C. Assessment results |
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| | | <p>development should have regard for improving safety, inclusivity and accessibility for those who live work and visit.</p> <p>Community services and facilities policies (HC-S6 Local Commercial Services and Community Facilities, HC-D18 Local Commercial Service Provision and HC-D19 Safeguarding Local Commercial Services and Community Facilities) enables the provision of accessible services and facilities including meeting places such as village halls and encourages opportunities to use them for a range of activities. Policies also provide for publicly accessible greenspace and seek to safeguard existing services and facilities.</p> <p>Policy RT-1 Recreation and Tourism seeks opportunities to provide a high quality, inclusive visitor experience through a diverse range of recreation and tourism facilities that actively enhance the understanding and enjoyment of the National Park’s special qualities</p> <p>Policy GP1: Achieving National Park Purposes and Sustainable Development supports the function and resilience of communities by retaining and strengthening their services and facilities, protecting their safe public places and employment opportunities, and providing for a size, type and tenure of housing to address local affordable needs and help create a balanced community.</p> <p>Accessibility is central to Policy RT-D12: Access Land and Rights of Way which protects the access network and transport policies, in particular, AC-S3 Traffic Management and Parking requires that the needs of all users including pedestrians, walkers, cyclists, horse-riders, and disabled people are taken account of. AC-D3 Parking Provision and Standards which includes provision for car sharing, cycle parking and parking for disabled users,</p> <p>Policy CE-S6: Design and Sustainable Construction Principles requires that the design and layout of development should have regard to improving safety, inclusivity and accessibility for those who live, work and visit there.</p> <p>The Local Plan was tested at examination against the 2012 NPPF and other national policy. Paragraph 69 of the 2012 NPPF referred to the need to facilitate social interaction and the creation of healthy, inclusive communities. It said planning policies should aim to achieve places which promote</p> |

| A. NPPF Requirement | B. NPPF Paragraph Reference | C. Assessment results |
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| | | opportunities for meetings between members of the community as well as safe and accessible environments. |
| Plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments. | NPPF Para 93 | <p>Community services and facilities policies (HC-S6 Local Commercial Services and Community Facilities, HC-D18 Local Commercial Service Provision and HC-D19 Safeguarding Local Commercial Services and Community Facilities) aim to ensure the provision of accessible services and facilities including, shops, public houses, meeting places such as village halls and also encourage opportunities to use them for a range of activities such as a hall with a shop/post office. Policies also provide for publicly accessible greenspace and seek to safeguard existing services and facilities.</p> <p>Policy GP3: Spatial Strategy aims to achieve thriving communities so that they are economically resilient, environmentally sustainable, socially mixed and inclusive.</p> |
| Take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community. | NPPF Para 93 | <p>A range of policies seek to ensure healthy, inclusive and accessible places which promote social interaction and healthy lifestyles Policy CE-S3 Biodiversity and Green Infrastructure aims to conserve and enhance wildlife and habitats. Paragraph 4.75 recognises that National Parks provide some of the best quality green infrastructure helping create a healthy environment for people, communities and businesses, and improving air and water quality.</p> <p>Paragraph 4.84 of the Plan explains that green infrastructure can provide a range of social and economic benefits for those who live and visit Exmoor. It is recognised that nature has a positive impact on health and helps children’s learning. High-quality natural environments foster healthy communities, and green spaces encourage social activity.</p> <p>Policy GP1: Achieving National Park Purposes and Sustainable Development reflects statutory National Park purposes: the conservation and enhancement of natural beauty wildlife and cultural heritage which themselves provide health social and cultural benefits to residents and visitors to the National Park. Criteria support health, social and cultural well-being; supporting the function and resilience of communities, protecting public places and helping create balanced communities; accessibility to services, local services and facilities, jobs and technology, the amenity of local residents, and visitors, conserving / enhancing the quiet enjoyment of the National Park; supporting</p> |

| A. NPPF Requirement | B. NPPF Paragraph Reference | C. Assessment results |
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| | | the health and socio-economic wellbeing of local communities and encouraging community participation. |
| Guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs. | NPPF Para 93 | <p>Local Plan Policies HC-S6 Local Commercial Services and Community Facilities, and HC-D19 Safeguarding Local Commercial Services and Community Facilities seek to safeguard existing local services and facilities.</p> <p>Lyn Plan Policies E8 Storage and E10 -Parking seek to provide for and prevent the loss of storage space and prevent the loss of parking capacity.</p> <p>Policy E8 Storage says: The provision of new storage space within and adjoining the settlements will be supported subject to the following criteria: a) the proposals would not have significant harmful impacts on the amenities of surrounding residents and other activities; and b) the proposals would not have a significant harmful impact on the surrounding rural landscape and landscape setting of the settlement.</p> <p>The loss of storage space will not be permitted unless: 1) it is to be replaced with storage space of an equal or higher quality on the same site or another site within the parish; or 2) the proposed alternative use would overall provide equal or greater benefits to the local economy and community.</p> <p>Policy E10- Parking says: Development proposals resulting in a loss of parking capacity of all types, except for areas of informal parking, will not be permitted unless: a) for on-street and public car parks, equivalent or better capacity is provided elsewhere in the settlement; b) for private car parks, equivalent or better capacity is provided elsewhere or the need for the private parking capacity can be shown to be reduced as a result of the development proposals.</p> |

| A. NPPF Requirement | B. NPPF Paragraph Reference | C. Assessment results |
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| Ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community. | NPPF Para 93 | Policies HC-S6 Local Commercial Services and Community Facilities, and HC-D19 Safeguarding Local Commercial Services and Community Facilities seek to safeguard existing local commercial services such as shops and local facilities such as village halls and schools. Policies allow for appropriate changes such as ancillary uses to support their viability and the shared use of facilities as this can benefit local communities. |
| Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services. | NPPF Para 93 | GP3: Spatial Strategy aims to ensure that communities are economically resilient and environmentally sustainable. Development is directed to named settlements. In “Local Service Centres” it strengthens their role and function to sustain and improve the wide range of services and facilities, serve the needs of the settlement and surrounding communities, address locally identified needs for housing and improve employment prospects for the local area. In smaller “Villages” with fewer services, development should contribute to and provide opportunities to address locally identified needs for housing and employment and sustain core services and facilities. |
| Consider the social, economic and environmental benefits of estate regeneration. | NPPF Para 94 | This is not relevant in Exmoor National Park. |
| Plan positively to meet school place requirements and to encourage development which will widen choice in education. | NPPF Para 95 | If evidence showed a need for more school places, community services and facilities policies (HC-S6 Local Commercial Services and Community Facilities, HC-D18 Local Commercial Service Provision and HC-D19 Safeguarding Local Commercial Services and Community Facilities) aim to ensure the provision of services and facilities e.g. the extension of schools or other needed school facilities. |
| Work proactively and positively with promoters, delivery partners and statutory bodies to plan for public service infrastructure. | NPPF Para 96 | The National Park Authority produced an infrastructure delivery plan as part of the Local Plan evidence base. This can be reviewed as needed (see Policy GP5 and paras 3.533.56) Policy GP5 – Securing Planning Benefits says that planning obligations will be required where reasonable, necessary and appropriate to ensure development can be made acceptable, be brought |

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| | | in line with policy objectives and to address infrastructure capacity deficits. Contributions will be determined on a case-by-case basis. |
| Promote public safety and take into account wider security and defence requirements. | NPPF Para 97 | Policy CE-S6 Design and Sustainable Construction Principles ensures that development proposals must consider public safety. 1e) says that the design and layout of development should have regard for improving safety, inclusivity and accessibility for those who live work and visit. |
| Provide open space, sports and recreational facilities which meets the needs of the local area. Consider how they can deliver wider benefits for nature and support efforts to address climate change. | NPPF Para 98 | HC-S6: Local Commercial Services and Facilities makes provision for green space “the provision of publicly accessible green space within or adjoining named settlements will be supported” and important visual amenity space within or adjoining settlements some of which is accessible and used by the public for recreation. Importantly, existing areas are safeguarded (HC-D19: Safeguarding Local Commercial Services and Community Facilities and HC-D20: Important Visual Amenity Space . Policy CE-D2 enables Green Infrastructure Provision . RT-S1: Recreation and Tourism provides for a diversity of recreation facilities and RT-D12: Access Land and Rights of Way safeguards the access network and includes provisions for its improvement and enhancement. |
| Protect and enhance public rights of way and access. | NPPF Para 100 | RT-D12: Access Land and Rights of Way safeguards the access network and includes provisions for its improvement and enhancement, provides linkages between routes and strengthen the green infrastructure network and require diversion and/or compensatory land of equal or better quality where necessary. |
| <i>Transport</i> | | |
| Should actively manage patterns of growth in support of objectives in Para 104. Significant development should be focused on locations which are/can be made sustainable. Opportunities to maximise sustainable transport | NPPF Para 105 | Exmoor is a remote rural area with a low population and low-density population and in line with its designation as a National Park, significant levels of development are not appropriate. Within this context, the Local Plan ensures there is an appropriate policy framework to manage patterns of growth. Policy GP3 – Spatial Strategy determines how new development is considered spatially and aims to ensure that opportunities are provided for settlements and communities to thrive and grow. Development is directed to named settlements to ensure that the Local Service Centre are |

| A. NPPF Requirement | B. NPPF Paragraph Reference | C. Assessment results |
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| <p>solutions will vary between urban and rural areas - this should be taken into account in plan-making.</p> | | <p>strengthened in their role and function of sustaining and improving the wide range of services and facilities and can continue to provide for the socio-economic needs of their communities. In smaller villages and rural communities with fewer services, development should seek to maintain or enhance their communities by providing for a diverse economy helping to retain and enhance key services and facilities and addressing the needs of local communities. Directing most development to named settlements helps reduce the need to travel.</p> <p>Policy AC-D1 - Sustainable Transport encourages sustainable transport modes, working with the highways and transport authorities to include public transport, walking, cycling, horse-riding and low carbon travel. Owing to the rurality of Exmoor much of the population relies on private car transport, therefore new development is focused within the named settlements to maximise sustainability and reduce the need to travel. This is in keeping with national policy in the National Parks Circular that new transport capacity could “include schemes to enhance public transport, provide car club and sharing schemes, or improve segregated cycling and walking connections between train stations, local towns, villages and car parks and the local rights of way network”⁵.</p> <p>Policy AC-D1 – Transport and Accessibility Requirements for Development sets out design requirements for new development. This includes demonstrating all opportunities are taken to encourage safe and sustainable transport modes including improving infrastructure of footpaths, cycle paths, rights of way, cycle parking/storage and electric charging points. Community severance must be avoided with good pedestrian and cyclist access to nearby services and facilities, including through public transport and car sharing.</p> <p>This NPPF policy was extant at the time of examination and the Local Plan was tested against it and found sound.</p> |
| <p>Support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and</p> | <p>NPPF Para 106</p> | <p>Policy GP3 – Spatial Strategy determines how new development is considered spatially and seeks to provide for an appropriate mix of uses in named settlements to reduce the necessity for and frequency of travel. It provides a policy framework for new development with a focus on reusing</p> |

⁵ Paragraph 87 [National Parks Circular \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

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| <p>length of journeys needed for employment, shopping, leisure, education and other activities.</p> | | <p>buildings and redevelopment in the open countryside. Plan policies provide flexibility for the appropriate extension and growth of existing development which encompasses taking account of any transport considerations and requirements.</p> <p>Policy AC-D1 – Transport and Accessibility Requirements for Development sets out the different requirements when designing transport in new development. This includes improving infrastructure of footpaths, cycle paths, rights of way, cycle parking/storage and electric charging points. Development must ensure good access for pedestrians/cyclists for journeys to nearby services and leisure, including public transport links and car sharing where appropriate.</p> <p>Policy AC-S3 – Traffic Management and Parking sets out the traffic management approach on Exmoor in including the needs of all users through alternative routes, shared surfaces and safer crossing points. Owing to the rural nature of Exmoor, private car travel is highly dependent for travel and sustainable transport modes are encourage where possible. The pre-amble of AC-S3 identifies public car parks as mitigating on-street parking and tourism season impacts within settlements. Additionally, reserving small car parks for residents along with provision of community car parks can alleviate parking problems, especially if associates with other facilities such as amenity space, village halls or public toilets (para 9.24).</p> <p>This NPPF policy was extant at the time of examination and the Local Plan was tested against it and found sound.</p> |
| <p>Identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development.</p> | <p>NPPF Para 106</p> | <p>Exmoor is a remote rural area with a low population. In line with its designation as a National Park, it is not appropriate or necessary to make provision to protect sites and routes to realise opportunities for large scale development. Policy RT-D12 – Access Land and Rights of Way seeks to safeguard the existing access network and protect it from development that would prejudice its current or future use (para 8.96). Much of the network is available to walkers, cyclists and equestrian users and opportunities to enhance and improve its inclusiveness and enjoyment for all users will be sought where possible. Additionally, Policy RT-D13 – Safeguarding Land Along Former Railways safeguards land along former railways – as well as being an important cultural heritage asset, they can also be re-used as part of the access network for walkers and cyclists (para 8.98).</p> |

| A. NPPF Requirement | B. NPPF Paragraph Reference | C. Assessment results |
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| | | <p>Policy AC-S2 – Transport Infrastructure provides for working with highways authorities and local communities to conserve, enhance and maintain transport infrastructure including traditional fords, bridges, signage, street furniture and new access roads. Upgrading routes solely to accommodate high traffic speeds, significant road widening and new roads are not supported as they would be inappropriate in a National Park context. This approach reflects national policy in the National Parks Circular which states “there is a strong presumption against any significant road widening or the building of new roads through a Park, unless it can be shown there are compelling reasons for the new or enhanced capacity and with any benefits outweighing the costs very significantly”⁶.</p> <p>Any new development within the National Park should be of an appropriate scale and type so that it can be safely serviced by the existing road network. The traffic likely to be generated should not exceed the capacity of the local road network and under Policy AC-D2 – Traffic and Road Safety Considerations for Development, the Exmoor Route Network will be taken into consideration when determining development proposals (map 9.1). The National Park has two principal transport routes - A-roads. Large-scale development would not be appropriate within the National Park. This NPPF policy was extant at the time of examination and the Local Plan was tested against it and found sound.</p> |
| <p>Provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking (drawing on Local Cycling and Walking Infrastructure Plans).</p> | <p>NPPF Para 106</p> | <p>Policy RT-D12 – Access Land and Rights of Way safeguards access land and rights of way from impacts resulting from development that is likely to affect its current or future use.</p> <p>New development must be inclusive and enable sustainable transport modes as appropriate, including walking and cycling e.g., footpaths, cycle paths, rights of way and cycle parking/storage. Community severance must be avoided with good pedestrian and cyclist access to nearby services and facilities, including through public transport and car sharing. This is encouraged through Policy AC-D1 – Transport and Accessibility Requirements for Development.</p> |

⁶ Paragraph 85 [National Parks Circular \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

| A. NPPF Requirement | B. NPPF Paragraph Reference | C. Assessment results |
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| | | This NPPF policy was extant at the time of examination and the Local Plan was tested against it and found sound. Issues associated with walking and local cycling have not been raised by the highways authorities through Duty to Co-operate. |
| Provide for any large-scale transport facilities that need to be located in the area and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. | NPPF Para 106 | There are no strategic national or regional freight routes through the National Park. The National Park Authority will support continued work by the Highway Authorities with hauliers and SatNav providers to take unnecessary through traffic, particularly lorries and HGVs, away from the National Park. Development including or relating to large-scale transport would not be appropriate within the National Park. |
| Recognise the importance of maintaining a national network of general aviation airfields. | NPPF Para 106 | Development including or relating to aviation and airfields would not be appropriate within the National Park. |
| Provide adequate overnight lorry parking facilities, taking into account any local shortages. | NPPF Para 109 | Development including or relating to overnight lorry parking facilities would not be appropriate within the National Park. |
| In assessing sites that may be allocated for development in plans, it should be ensured that: appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; safe and suitable access to the site can be achieved for all users, the design of streets, parking areas, other transport elements and the | NPPF Para 110 | The adopted Local Plan does not include any site allocations. Settlements within the National Park exist in an extremely rural area. A rural exception sites approach provides for housing to meet local needs. This approach does not define or allocate sites within the Local Plan. Similarly, sites/land for employment use are not allocated, instead, a flexible criteria based approach enables the release of appropriate sites/buildings in response to emerging needs. The rurality of the area in conjunction with past trends and forecasted future growth show it is not |

| A. NPPF Requirement | B. NPPF Paragraph Reference | C. Assessment results |
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| <p>content of associated standards reflects current national guidance including the National Design Guide and the National Model Design Code; and any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.</p> | | <p>possible to ascertain which sites/buildings are likely to be developed for employment purposes so allocations could not be achieved with any reasonable degree of accuracy⁷.</p> <p>Where sites and development are proposed, Policy AC-D1 – Transport and Accessibility Requirements for Development sets out the relevant design requirements. This includes demonstrating all opportunities are taken advantage of to encourage safe and sustainable transport modes including improving infrastructure of footpaths, cycle paths, rights of way, cycle parking/storage and electric charging points. Community severance must be avoided with good pedestrian and cyclist access to nearby services and facilities, including through public transport and car sharing. Design policies ensure development is appropriate to its context and that it conserves and enhances the National Park while supporting text also refers to the design of streets. The design guide is being reviewed.</p> |
| <p>Development should only be prevented on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.</p> | <p>NPPF Para 111</p> | <p>Policy AC-D2 – Traffic and Road Safety Considerations for Development requires that development proposals will not generate unacceptable levels of traffic on the local road network or cause road safety issues -the Exmoor Route Network will be considered in determining proposals to ensure likely traffic generation from development is capable of being served by the existing road capacity.</p> <p>This NPPF policy was extant at the time of examination and the Local Plan was tested against it and found sound.</p> |
| <i>Communications</i> | | |
| <p>Support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections, setting out how high-</p> | <p>NPPF Para 114</p> | <p>Policies AC-S4 – Electricity and Communications Networks, AC-D5 – Radio and Telecommunications Infrastructure, AC-D6 – Fixed Line Transmission Infrastructure and AC-D7 – Satellite Antennae seek to support improvements to communications infrastructure in order to contribute to Exmoor’s communities and businesses. This includes supporting superfast broadband roll-out and mobile phone network improvements. Communications infrastructure improvements are supported for business and community viability with consideration given for sensitive siting, so development does</p> |

⁷ Nathaniel Lichfield and Partners (2009) Exmoor National Park Employment Land Review

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| quality digital infrastructure is expected to be delivered and upgraded over time. | | <p>not conflict with the National Park designation. In the first instance, development should seek to share existing infrastructure.</p> <p>This NPPF policy was extant at the time of examination and the Local Plan was tested against it and found sound.</p> |
| <i>Making effective use of land</i> | | |
| Promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. | NPPF Para 119 | <p>GP1 Achieving National Park Purposes and Sustainable Development: seeks to conserve and enhance the National Park. It sets out a range of factors that will be taken account of in considering new development including the efficient use of land, buildings, services and infrastructure, supporting the health and socio-economic well-being of local communities.</p> <p>GP3: Spatial Strategy directs new development to the named settlements where most services are located to strengthen the role and function of settlements, address local need sand sustain core services. It also sets out the strategic policy for development the open countryside to ensure that it is protected.</p> <p>GP4: The Efficient Use of Land and Buildings encourages development to make efficient use of land and buildings and the redevelopment of brownfield land through the reuse of buildings and other previously developed land in the named settlements or the reuse of buildings in farmsteads/hamlets. It also guides the density of new housing development and should not result in the loss of the best and most versatile agricultural land.</p> |
| Set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land. | NPPF Para 119 | <p>Policy GP4 The Efficient Use of Land and Buildings promotes sustainable development and the efficient use of land. It encourages development to make efficient use of land and buildings and the redevelopment of brownfield land through the reuse of buildings and other previously developed land in the named settlements or the reuse of buildings in farmsteads/hamlets.</p> <p>The Local Plan housing strategy was informed by an assessment of landscape sensitivity. The assessment identified low, moderate and high landscape sensitivity within and around settlements and the capacity of the settlement to accommodate new housing development. The study showed</p> |

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| | | <p>there are few remaining suitable areas for development, and therefore making best use of land through brownfield sites and the reuse of buildings is a key part of the strategy. The housing strategy was also informed by the OAN for the National Park (paras 6.26-6.29). The Plan has no housing target, instead there is an indicative figure for affordable housing (paras 6.30-6.33). HC-S1: Housing says that new housing will be delivered “exceptionally” as the strategy is based on a needs led rural exceptions approach to deliver housing without site allocations consistent with paragraph 78 of the NPPF. Policy GP4 also requires that the density of new housing development should be informed by an analysis of the surrounding built form and landscape, appropriate for the National Park. For sites of 10 or more dwellings density should be at least 30 dwellings per hectare).</p> |
| <p>Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.</p> | <p>NPPF Para 120</p> | <p>Policy GP3 – Spatial Strategy aims to ensure communities are environmentally sustainable, socially mixed and inclusive. Development should accord with the spatial strategy to ensure sustainable development.</p> <p>Policy GP4 – The Efficient Use of Land and Buildings encourages sustainable development that makes the most efficient use of land and buildings, with a focus on brownfield land and the re-use of existing buildings. The pre-amble in paragraph 3.46 also identifies the benefits of re-using existing buildings which enables uses in the open countryside, e.g. for new housing needed by local communities, that otherwise could not be permitted. The policy also sets out that development within, or adjoining, the named settlements should make the best use of the land in terms of the density of buildings and green infrastructure provision.</p> <p>Policy GP1 – Achieving National Park Purposes and Sustainable Development also identifies that when considering new development, particular attention will be paid to the efficient use of land, buildings, services and infrastructure and retaining and strengthening services and facilities. It seeks to ensure that new development will both conserve and enhance the National Park in line with statutory purposes.</p> <p>Policy CE-S3 – Biodiversity and Green Infrastructure sets out that all development should avoid harm to biodiversity and encourages ways of enhancing biodiversity and creating multi-functional green infrastructure networks to support ecosystem services. In addition to this, the policy also identifies</p> |

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| | | that green infrastructure measures which enhance biodiversity should be provided as an integral part of new development. |
| Recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production. | NPPF Para 120 | <p>The Vision for Exmoor National Park to 2031, vision 4, identifies the importance in sustainably using Exmoor’s natural resources and ecosystems - it recognises the importance of land such as woodland cover and mire acting as ‘carbon sinks’. This is also reflected in objective 7 to conserve and enhance Exmoor’s natural resources.</p> <p>Local Plan policies set out a proactive approach to mitigating and adapting to climate change. In the section on landscape resilience, paragraphs 4.12-4.14 initially identify the importance of ensuring landscapes are effective at mitigating or adapting to climate change. In particular, forests and woodlands are considered to achieve a resilient and coherent ecological network recognising that new and existing woodlands are important habitats, enable enjoyment and they mitigate climate change through carbon sequestration. Similarly, managing and restoring moorland provides opportunities for carbon sinks. A significant area of Exmoor’s moorland has already been ‘rewetted’.</p> <p>Policy CE-S3 – Biodiversity and Green Infrastructure identifies that multi-functional green infrastructure networks at a variety of spatial scales can be created to help support ecosystem services. The pre-amble to this policy also recognises that carbon storage such as woodland planting and mire restoration is an important way of mitigating climate change. Policy CC-S1 – Climate Change Mitigation and Adaptation further supports this in encouraging measures which support the management of uplands and woodlands to assist in carbon sequestration and storage. Furthermore, policy CC-S1 also encourages proposals that adapt to the consequences of climate change, including those avoiding areas at risk of flooding, and proposals which promote land management that reduces the overall risk of flooding.</p> <p>Policy CC-D1 – Flood Risk encourages development proposals that do not increase the risk of flooding and do not prejudice the potential land use for current or future flood management.</p> |

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| <p>Give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.</p> | <p>NPPF Para 120</p> | <p>Policy GP4 - The Efficient Use of Land and Buildings promotes sustainable development with an importance placed on considering land for development that has been previously developed. As a remote rural area, there are few brownfield sites in the National Park – agricultural buildings do not come within the definition of previously developed land.</p> <p>An assessment of landscape sensitivity was undertaken which informed the plan. The study also showed there are few remaining suitable areas for development, and therefore the Plan prioritises making the best use of land - reusing buildings and previously developed land. Implicit in the Plan, including the housing strategy, is that reusing PDL helps conserve the National Park by minimising the need for greenfield sites for new build development</p> <p>Policy GP4 also establishes that the density of new housing development should be informed by an analysis of the surrounding built form and landscape, and that density should be appropriate and contribute to National Park Purposes. For sites of 10 or more dwellings density should be at least 30 dwellings per hectare).</p> <p>With regards to contaminated land, due to Exmoor’s long history of mineral extraction, it is recognised that there may be a number of sites with pollution risk if disturbed (para 5.146). Policy CC-S7 – Pollution seeks to ensure that where pollution cannot be avoided, contaminated land will require remediation before development can progress.</p> |
| <p>Promote and support the development of under-utilised land and buildings.</p> | <p>NPPF Para 120</p> | <p>Policy GP4 – The Efficient Use of Land and Buildings encourages sustainable development that makes the most efficient use of land and buildings, with a focus on brownfield land and the re-use of existing buildings, both of which reflect this NPPF requirement of developing under-utilised land and buildings. The pre-amble in paragraph 3.46 also identifies the benefit of flexibility in re-using existing buildings due to the uses considered acceptable in the open countryside that would otherwise not be permitted as new build. The policy also sets out that development within, or adjoining, the named settlements should make the best use of the land in terms of the density of buildings and green infrastructure provision.</p> |

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| Support opportunities to use the airspace above existing residential and commercial premises for new homes. | NPPF Para 120 | <p>In a National Park, the overriding consideration is the conservation and enhancement of the area. Permitted Development rights (introduced in 2020) allowing for the construction of new flats in airspace on a variety of buildings are not permitted on Article 2(3) Land which includes National Parks and Conservation Areas. This exemption indicates that the upward extension of buildings is not considered to be appropriate in principle in such areas.</p> <p>Local Plan policies seek to maximise opportunities for the delivery of locally needed affordable housing while ensuring that other Plan objectives are not compromised (SE-D2 Safeguarding Existing Employment Land and Buildings and HC-D19 Safeguarding Local Commercial Services and Facilities). Policy HC-S1: Housing sets out the overarching housing strategy and HC-D1 Vacant Buildings in Settlements, HC-D2: Conversions to Dwellings in Settlements and HC-D7 Conversions to Dwellings in the Open Countryside provide detailed criteria to guide development including the appropriate reuse of existing commercial buildings. Proposals for additional stories would not be considered to be generally appropriate in a National Park because of the potential impact on the landscape, local character and heritage interests. Additional stories (the upward extension) of buildings into “airspace” would be considered on a case by case basis guided by Policy HC-D15: Residential Extensions and CE-S5 Principles for Conversion or Structural Alteration of Existing Buildings and taking account of other interests that the Plan seeks to protect including the character of the area, conservation of the landscape and heritage and the amenity of neighbouring uses and neighbours.</p> |
| Reflect changes in the demand for land. | NPPF Para 122 | <p>Local Plan policies including Policy GP1 - Achieving National Park Purposes and Sustainable Development, HC-S1 - Housing and associated housing policies and CE-S1 - A Sustainable Exmoor Economy and associated employment policies provide a flexible criteria based approach without allocations to enable new development to respond to changes in circumstances so that proposals can come forward as needed</p> <p>Policy GP1 - Achieving National Park Purposes and Sustainable Development sets out criteria that will guide new development, including the efficient use of land. In the context of housing need and demand, Policy M1-S1 – Monitoring and Review of Affordable Housing Need and Provision ensures</p> |

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| | | <p>that the indicative figure for housing is monitored, together with housing permissions and completions.</p> <p>Demand for land and its uses can change over time and Policy GP4 - The Efficient Use of Land and Buildings encourages development to make efficient use of land and buildings.</p> |
| <p>Support development that makes efficient use of land, taking into account the need for different types of housing and other forms of development, local market conditions, the availability and capacity of infrastructure and services, the character and setting of the area, and the importance of securing well-designed, attractive and healthy places.</p> | <p>NPPF Para 124</p> | <p>Policy GP3 Spatial Strategy identifies where new development will be focused in order to ensure that communities are sustained over the longer term, through encouraging appropriate development of a scale that is proportionate to its location and reflects the socio-economic needs of Exmoor’s communities. This ensures that Exmoor’s settlements are socially cohesive and that balanced and mixed communities are maintained.</p> <p>Policies require high-quality design in a way that conserves and enhances the National Park including its character. Policy GP1 Achieving National Park Purposes and Sustainable Development, is consistent with paragraph 124 of the NPPF; it requires that development for Exmoor National Park will conserve and enhance the National Park, its natural beauty, wildlife and cultural heritage and its special qualities.</p> <p>In addition, the policy requires that particular attention be paid to ensuring high quality design; the impact on the character and setting of the National Park; accessibility to local services and facilities; supporting the health and socio-economic wellbeing of the local communities; efficient use of land, buildings, services and infrastructure.</p> <p>Policy GP4 The Efficient Use of Land and Buildings promotes sustainable development and the efficient use of land. The Policy seeks the use of previously developed land for development including the reuse of buildings.</p> <p>Local market conditions were considered as part of an ENP Whole Plan Viability study and in housing topic papers which informed the Local Plan housing strategy. HC-S1: Housing says that new housing will be delivered “exceptionally” through a needs led rural exceptions approach to the delivery of housing without site allocations enabling new local needs housing to come forward as needed and for viability to be considered on a case by case basis. HC-D1: Vacant Buildings includes a criterion to</p> |

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| | | <p>consider viability and HC-D2: Conversions to Dwellings in Settlements and HC-D3: New Build Dwellings in Settlements ensure there is flexibility to consider cross subsidy to deliver affordable housing through Principal Residence housing (GP5: Securing Planning Benefits – Planning Obligations). Policies with a flexible criteria-based approach, allow development to come forward in response to local market conditions: employment policies: (SE-S1: A Sustainable Exmoor Economy; SE-S2: Business Development in Settlements; SE-S3 Business Development in the Open Countryside; SE-D1 Home Based Businesses) and community services/facilities policies (HC-S6: Local Commercial Services and Community Facilities; HC-D18: Local Commercial Service Provision and HC-S7: Residential Institutions). Safeguarding policies for employment sites (SE-D2 Safeguarding Existing Employment Land and Buildings) and community services and facilities (HC-D19 Safeguarding Local Commercial Services and Facilities) provide flexibility by setting out clear marketing tests and a route to change of use where existing uses are unviable. Recreation and Tourism / visitor accommodation policies (RT-S1: Recreation and Tourism; RT-D1: Serviced Accommodation; RT-D2: Staff Accommodation; RT-D4: Non Serviced Accommodation) and camping policies (RT-D5: Tented Campsites; RT-D6: Camping Barns and RT-D9: Alternative Camping Accommodation) provide appropriate flexibility to respond to market conditions in a protected landscape. Policy RT-D3: Safeguarding Serviced Accommodation allows for the change of use of accommodation where unviability is demonstrated.</p> <p>There is also scope within Policy HC-S4 Principal Residence Housing, for the provision of principle residence housing in response to market conditions. should it be part of a wider scheme to deliver affordable housing.</p> |
| <p>Avoid homes being built at low densities where there is an existing or anticipated shortage of identified housing needs, and where appropriate include the use of minimum density standards. Area-based character assessments, design guides, design codes and masterplans</p> | <p>NPPF Para 125</p> | <p>Policy GP4 The Efficient Use of Land and Buildings sets out the minimum density standards which apply to developments of 10 or more dwellings.</p> <p>For smaller site (less than 10 dwellings), the density of new housing development is informed by an analysis of the surrounding built form, and landscape, to achieve development density that is appropriate for the local area and National Park. This contextual approach is considered to be</p> |

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| <p>are appropriate tools to use to help to ensure land is used efficiently while also creating beautiful and sustainable places.</p> | | <p>appropriate to ensure a suitable density of housing in Exmoor where developments are generally small scale.</p> <p>The overriding consideration in a National Park is the conservation and enhance of the area in line with statutory purposes and as required by Policy GP1 Achieving National Park Purposes and Sustainable Development.</p> |
| <i>Design</i> | | |
| <p>Set out a clear design vision and provide maximum clarity about design expectations through the preparation of design codes or guides consistent with the National Design Guide and National Model Design Code, and which reflect local character and design preferences. Design codes and guides can either form part of a plan or be supplementary planning documents.</p> | <p>NPPF Para 127, 128 & 129</p> | <p>Objective 6 of the Local Plan is for new development to use local materials, sustainable building design and methods, in ways that contribute to the distinctive character and cultural heritage of Exmoor.</p> <p>Strategic priority 1 iv), encourages high quality design and sustainable construction, to enhance the National Park’s landscapes and settlements.</p> <p>The Local Plan contains detailed strategic and development management policies which seek high quality design which is a key requirement for development to conserve and enhance the National Park and achieve National Park purposes. Policy CE-S6 Design and Sustainable Construction sets out the principles guiding the design and construction of new development. It contains clear design criteria for development to be considered appropriate, including: layout; orientation; siting; density; scale; materials; landscaping and architectural detailing. Policy CE-S6 requires new development to reflect the design of traditional buildings on Exmoor. Development should enhance the local landscape and use traditional, natural materials.</p> <p>Policy CE-S5, relates to the Conversion or Structural Alteration of Existing Buildings. It sets out design requirements for development to be considered acceptable. Specific design considerations are set out in paragraph 4.126 supporting the Policy, such as window, door, roof and other external materials. The policy also requires that the historic fabric and architectural interest of a building and its setting is retained, conserved and enhanced.</p> |

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| | | <p>Specific policies relate to residential extensions. Policy CE-D4 establishes the design requirements for a residential extension; including that they are subservient, reflect the form and symmetry of the original dwelling, and that the architectural detailing of a traditional building is preserved.</p> <p>Exmoor National Park Authority is also reviewing its design guide to be adopted as a supplementary planning document. This will take account of the national design guide and the national model design code as well as Local Plan policies</p> |
| <p>Ensure that developments will function well and add to the overall quality of the area, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, establish or maintain a strong sense of place, optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development, and create places that are safe, accessible and inclusive.</p> | <p>NPPF Para 130</p> | <p>Vision 3 of the Vision for Exmoor National Park to 2031 outlines that through the conservation of historic settlements, building and farmsteads Exmoor’s historic environment and cultural and community heritage has been sustained. New development on Exmoor is permitted and carefully managed to ensure that the diversity and traditional historic character of Exmoor’s settlements and buildings are conserved and enhanced for future generations.</p> <p>Objective 6 encourages new development that uses local materials and sustainable building methods that contribute to the distinctive character and cultural heritage of Exmoor. Strategic priority 1 iv) encourages high quality design and sustainable construction with the intention of enhancing Exmoor’s landscapes and settlements.</p> <p>Policy CE-S6 – Design and Sustainable Construction sets out the principles and criteria guiding design and the construction of new development. This includes layout, orientation, siting, density, scale, materials, landscaping and architectural detailing. New development is required to reflect the design of traditional buildings on Exmoor and should enhance the local landscape by using traditional and natural materials to ensure that developments add to the overall quality of the area and are sympathetic to local character and history.</p> <p>Exmoor National Park Authority is also reviewing its design guide to be adopted as a supplementary planning document. This will take account of the national design guide and the national model design code as well as Local Plan policies</p> |

| A. NPPF Requirement | B. NPPF Paragraph Reference | C. Assessment results |
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| <p>Ensure new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments, that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible.</p> | <p>NPPF Para 131</p> | <p>New planting will be required including new trees where it will contribute to the local character and biodiversity of Exmoor National Park in line with Plan policies.</p> <p>Policy CE-S6 – Design and Sustainable Construction sets out the principles and criteria guiding design and the construction of new development. This includes landscaping. New development should enhance the local landscape to ensure that developments add to the overall quality of the area and are sympathetic to local character.</p> <p>Policies CE-S1 Landscape and seascape Character and CE-D1 Protecting Exmoor’s Landscape and Seascape Character aim to ensure that new development is informed by the features that represent Exmoor’s landscape character e.g. by adding to and/or retaining important landscape features such as hedgerows or woodland. The policy also identifies other significant landscape attributes which development proposals should aim to conserve including important trees and orchards.</p> <p>Policy CE-D2 Green Infrastructure Provision requires development to integrate elements of green infrastructure for wildlife.</p> |
| <i>Green Belt</i> | | |
| <p>Ensure proposals for new Green Belts demonstrate why development management policies would not be adequate, any major changes in circumstances to warrant the creation of a new Green Belt, the consequences for sustainable development, the need for Green Belt to support adjoining areas, and how new Green Belt would meet other objectives of the Framework.</p> | <p>NPPF Para 139</p> | <p>NPPF paragraphs on Green Belts are not relevant for the National Park.</p> |

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| <p>Establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Even when exceptional circumstances are demonstrated strategically to take land out of the Green Belt, it is still necessary to demonstrate that exceptional circumstances exist at the site level.</p> | <p>NPPF Para 140</p> | <p>NPPF paragraphs on Green Belts are not relevant for the National Park.</p> |
| <p>Give first consideration to land which has been previously-developed and/or is well-served by public transport, including increasing density within town and cities centres. Set out the ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.</p> | <p>NPPF Para 141 & 142</p> | <p>NPPF paragraphs on Green Belts are not relevant for the National Park.</p> |
| <p>Where Green Belt boundaries are being defined, they should be clearly outlined and be consistent with the plan's strategy for meeting identified requirements for sustainable development.</p> | <p>NPPF Para 143</p> | <p>NPPF paragraphs on Green Belts are not relevant for the National Park.</p> |

| A. NPPF Requirement | B. NPPF Paragraph Reference | C. Assessment results |
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| <i>Climate change, flooding and coastal change</i> | | |
| <p>Take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperature.</p> | <p>NPPF Para 153</p> | <p>Local Plan policies set out a proactive approach to mitigating and adapting to climate change. In the section on landscape resilience, paragraphs 4.12-4.14 initially identify the importance of ensuring landscapes are effective at mitigating or adapting to climate change. In particular, forests and woodlands are considered to achieve a resilient and coherent ecological network recognising that new and existing woodlands are important habitats, enable enjoyment and they mitigate climate change through carbon sequestration. Similarly, managing and restoring moorland provides opportunities for carbon sinks. A significant area of Exmoor’s moorland has already been ‘rewetted’.</p> <p>Strategic Policy GP1 – Achieving National Park Purposes and Sustainable Development (clause 3i) requires opportunities to be taken to contribute to sustainable development. Particular attention will be paid to the needs of future generations through sustainability and resilience to climate change and adapting to and mitigating the impacts of climate change as well as to sustainable building.</p> <p>Policy CC-S1 – Climate Change Mitigation and Adaptation encourages mitigation measures through promoting the energy hierarchy, which focuses on reducing and efficient use of energy and using small scale low carbon and renewable energy. It also identifies measures such as avoiding sites that would put wildlife at risk and ensuring sustainable and efficient water supplies through reducing demand and encouraging water conservation. Additionally, measures that support the management of uplands and woodlands to assist in carbon sequestration and storage are encouraged. The policy also encourages proposals which adapt to the consequences of climate change. Such adaptations include avoiding areas of flood risk, improving the resilience of development and infrastructure to cope with climate change, and promoting land management to reduce flood risk.</p> <p>Policy CC-S2 – Coastal Development states that development proposals should avoid areas at risk from coastal change. Where development at the coast is permitted, it will need to demonstrate that it is not within an area identified as at risk (including CCMA) and would not increase the risk to life and property or affect natural coastal processes on any part of the coastline. Development leading to an increase in coastal erosion will not be permitted. A Coastal Change Management Area (CCMA) is designated at Porlock Weir through Policy CC-S3. Permanent new residential development will not be</p> |

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| | | <p>permitted within this area, but the policy does provide for key infrastructure development with wider community benefits, or that which increases flood risk resilience.</p> <p>Policy CE-D2 – Green Infrastructure Provision requires that development proposals should include measures to enhance green infrastructure provision and create opportunities for wildlife within the National Park. Green infrastructure proposals should seek to maximise opportunities to mitigate and adapt to climate change. Additionally, the multi-functional role of green infrastructure is identified in paragraph 4.76 for the benefits it brings in relation to biodiversity, carbon storage, flood protection and water purification.</p> <p>Policy CE-D3 - Conserving Heritage Assets sets out measures for heritage assets for climate change adaptation and mitigation.</p> <p>Policy CE-S6 – Design and Sustainable Construction Principles recognises that, to incorporate sustainable construction methods, proposals should future proof against climate change impacts, including flood risk, in accordance with Policy CC-S1.</p> <p>Policy CC-D1 – Flood Risk states that development proposals will be permitted where they are consistent with the sequential test and can demonstrate the site is at little or no risk of flooding. Proposals must not increase flood risk elsewhere or impact upon the land use for current or future flood management. Proposals must also be compatible with the appropriate Catchment Flood Management Plan or Shoreline Management Plan and should be used to reduce the risk of flooding through layout, design and sustainable drainage systems to minimise surface water run-off and pollution.</p> <p>Policy CC-D2 – Water Conservation aims to ensure development proposals incorporate water conservation measures including those that recycle, store and reuse rainwater and greywater. Proposals leading to an increase in demand where the existing water supply is inadequate or cannot be satisfactorily improved will not be supported.</p> <p>Policy CC-S5 – Low Carbon and Renewable Energy Development encourages small scale renewable energy schemes that can assist in contributing towards reducing greenhouse gas emissions and moving towards a carbon neutral National Park.</p> |

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| | | <p>Policy CC-D3 – Small Scale Wind Turbines aims to permit proposals for individual turbines serving individual or groups of properties where they are sited in suitable areas and are appropriate in scale to the property being served. Policy CC-D4 – Freestanding Solar Arrays enables small scale freestanding solar arrays that serve the needs of individual properties, groups of properties, community buildings, agricultural properties and other businesses. Proposals should be sited within suitable areas and be appropriate in scale and proportion to the size of the property being served.</p> |
| <p>Support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts.</p> | <p>NPPF Para 153</p> | <p>Strategic Policy GP1 – Achieving National Park Purposes and Sustainable Development (clause 3i) requires opportunities to be taken to contribute to sustainable development. Particular attention will be paid to the needs of future generations through sustainability and resilience to climate change and adapting to and mitigating the impacts of climate change as well as to sustainable building.</p> <p>Policy CC-S1 – Climate Change Mitigation and Adaptation encourages mitigation measures through promoting the energy hierarchy, which focuses on reducing and efficient use of energy and using small scale low carbon and renewable energy forms. It also identifies measures such as avoiding sites that would put wildlife at risk and ensuring sustainable and efficient water supplies through reducing demand and encouraging water conservation. Additionally, measures that support the management of uplands and woodlands to assist in carbon sequestration and storage are encouraged. The policy also encourages proposals which adapt to the consequences of climate change. Such adaptations include avoiding areas of flood risk, improving the resilience of development and infrastructure to cope with climate change, and promoting land management to reduce flood risk.</p> <p>Policy CC-S2 – Coastal Development states that development proposals should avoid areas at risk from coastal change. Where development at the coast is permitted, it will need to demonstrate that it is not within an area identified as at risk (including CCMA) and would not increase the risk to life and property or affect natural coastal processes on any part of the coastline. Development leading to an increase in coastal erosion will not be permitted. A Coastal Change Management Area (CCMA) is designated at Porlock Weir through Policy CC-S3. Permanent new residential development will not be permitted within this area, but the policy does provide for key infrastructure development with wider community benefits, or that which increases flood risk resilience.</p> |

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| | | <p>Policy CE-D2 – Green Infrastructure Provision sets out that development proposals should include measures to enhance green infrastructure provision and create opportunities for wildlife within the National Park, commensurate with the scale of the proposal. Green infrastructure proposals should seek to maximise opportunities to mitigate and adapt to climate change and improve the quality of life through provision of health and well-being benefits including opportunities for open space and enjoyment. Additionally, the multi-functional role of green infrastructure is identified in paragraph 4.76 for the benefits it brings in relation to biodiversity, carbon storage, flood protection and water purification.</p> <p>Policy CE-S6 – Design and Sustainable Construction Principles recognises that to incorporate sustainable construction methods, proposals should future proof against climate change impacts, including flood risk, in accordance with Policy CC-S1. Additionally, Policy CE-S6 says proposals which reduce carbon emissions further than required by building regulations (including through improved energy efficiency or renewable/low carbon technologies) will be permitted.</p> <p>Policy CC-D1 – Flood Risk states that development proposals will be permitted where they are consistent with the sequential test and can demonstrate the site is at little or no risk of flooding. Proposals must not result in an increased flood risk elsewhere or impact upon land use for current or future flood management. Proposals must also be compatible with the appropriate Catchment Flood Management Plan or Shoreline Management Plan and should reduce the risk of flooding through layout, design and sustainable drainage systems to minimise surface water run-off and pollution.</p> <p>Policy CC-D2 – Water Conservation aims to ensure development proposals incorporate water conservation measures including those that recycle, store and reuse rainwater and greywater. Proposals leading to an increase in demand where the existing water supply is inadequate or cannot be satisfactorily improved will not be supported.</p> <p>Policy CC-S5 – Low Carbon and Renewable Energy Development encourages small scale renewable energy schemes that can assist in contributing towards reducing greenhouse gas emissions and moving towards a carbon neutral National Park. Such proposals are permitted where they provide</p> |

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| | | <p>environmental enhancement or community benefits and contribute towards meeting domestic, community or business energy needs within the National Park.</p> <p>Policy CC-D3 – Small Scale Wind Turbines aims to permit proposals for individual turbines serving individual or groups of properties where they are sited in suitable areas and are appropriate in scale to the property being served. Policy CC-D4 – Freestanding Solar Arrays encourages small scale freestanding solar arrays that serve the needs of individual properties, groups of properties, community buildings, agricultural properties and other businesses. Proposals will be permitted where they are sited within suitable areas and are appropriate in scale and proportion to the size of the property being served.</p> <p>Policy CE-D3 – Conserving Heritage Assets seeks to protect heritage assets from the effects of climate change through encouraging proposals that will adapt to, or mitigate the effects of, climate change to safeguard the heritage asset over the longer term.</p> <p>Policy CC-D5 – Sewerage Capacity and Sewage Disposal requires that proposals for new or extended sewerage infrastructure use necessary mitigation measures, including climate change resilience measures, to avoid impacts on surrounding areas.</p> <p>Policy HC-S7 – Residential Institutions supports proposals for new residential institutions where they seek to mitigate climate change effects and adapt to its impacts, including avoiding areas at risk of flooding.</p> <p>Policy AC-S2 – Transport Infrastructure sets out that the ENPA will work with highways authorities and local communities to ensure highways and transport infrastructure works increase the future resilience of transport infrastructure at risk from climate change, and extreme weather events through the use of sustainable drainage systems.</p> <p>Policy AC-S4 – Electricity and Communications Networks encourages development that improves the standard and accessibility of the electricity and communications network in order to contribute to thriving communities and businesses and climate change mitigation.</p> |

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| <p>Increase the use and supply of renewable and low carbon energy and heat by providing a positive strategy for energy from these sources, identifying suitable areas for renewable and low carbon energy sources, and identifying opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.</p> | <p>NPPF Para 155</p> | <p>Paragraph NPPF 155 a) also says <i>provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts)</i></p> <p>Policy CC-S1 Climate Change Mitigation and Adaptation requires all development, including replacement and enhancement schemes, to demonstrate how it has had regard to the energy hierarchy by reducing energy, using energy more efficiently, and using low carbon and renewable energy. The Policy also places importance on proposals using small scale low carbon and renewable energy through sustainable design and construction in line with Policy CE-S6.</p> <p>Policy CC-S5 Low Carbon and Renewable Energy Development supports low carbon and small scale renewable energy development, provided that there is no significant environmental harm to the area or the National Park as a whole. The Policy refers to small scale energy development, and small scale is defined as schemes of a scale that can be carried out within the capacity of the local environment and consistent with its landscape character, without causing damage to its natural beauty, cultural heritage, wildlife, or eroding enjoyment of the special qualities of an area, in accordance with statutory purposes. The Policy enables development proposals for small scale renewable energy schemes to be permitted where they contribute towards domestic, community or business energy needs within the National Park.</p> <p>The Policy also says that small scale renewable energy schemes that assist in reducing greenhouse gas emissions will be permitted where they: <i>‘b) are compatible with the landscape and seascape character of the locality and avoid the most sensitive landscapes’, and e) ‘provide environmental enhancement or community benefits wherever possible’.</i></p> <p>NPPF Paragraph 155 b) <i>consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development.</i></p> <p>Exmoor National Park is Article 2(3) land, and in Exmoor National Park, large and medium scale renewable energy projects are not considered acceptable. Nationally significant energy infrastructure projects will be determined by Secretary of State.</p> |

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| | | <p>Policies CC-D3 Small Scale Wind Turbines, and CC-D4 Free Standing Solar Arrays, identify suitable areas for these types of development. These areas are shown on a map form and are explained in the supporting text to Policies CC-D3 and Policy CC-D4.</p> <p>The Local Plan preamble to Policy CC-S5 makes clear that the acceptability of a proposed development will vary on a case by case basis according to the type of development, location and landscape setting, and sensitivity.</p> <p>NPPF Paragraph 155 c) c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for collocating potential heat customers and suppliers.</p> <p>The preamble to Policy CC-S5, paragraph 5.59, reads: ‘In appropriate circumstances, small scale renewable energy schemes utilising technologies such as solar panels, biomass heating, small scale wind turbines, photovoltaic cells, and combined heat and power schemes can be incorporated into new developments and some existing buildings’. This is supported by Policy CE-S6 which requires proposals to promote the use of sustainable resources; and encourages the reduction of carbon emissions further than required by Building Regulations. This policy includes flexible criteria, and the strategy encourages the use of renewable energy sources. However, the scale of development seen on Exmoor means the option for collocating is not likely. Policy GP3 seeks to ensure development is focused on named settlements where most people live. And because co-location is not likely does not mean that opportunities would not be explored or encouraged by the Policy.</p> |
| <p>Manage flood risk from all sources and apply a sequential, risk based approach to the location of development.</p> | <p>NPPF Para 160 & 161</p> | <p>Policy CC-D1 – Flood Risk states that development proposals will be permitted where they are consistent with the sequential test and can demonstrate the site is at little or no risk of flooding. Proposals must not result in an increased flood risk elsewhere or impact upon land use for current or future flood management. Proposals must also be compatible with the appropriate Catchment Flood Management Plan or Shoreline Management Plan and should reduce the risk of flooding through layout, design and sustainable drainage systems to minimise surface water run-off and pollution.</p> |

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| | | <p>The second strategic priority of the Local Plan, clause v, states that to support communities and respond to climate change, local communities will be helped to adapt to climate change, including flood risk and coastal change.</p> <p>Policy CE-S6 – Design and Sustainable Construction Principles recognises that in order to incorporate sustainable construction methods, proposals should future proof against climate change impacts, including flood risk, in accordance with Policy CC-S1.</p> <p>Policy CC-S1 – Climate Change Mitigation and Adaptation says that proposals which adapt to the consequences of climate change will be encouraged. Such adaptations include avoiding areas of flood risk, improving the resilience of development and infrastructure to cope with climate changes, and promoting land management to reduce flood risk.</p> <p>A Coastal Change Management Area (CCMA) is designated at Porlock Weir as set out in Policy CC-S3, under which permanent new residential development will not be permitted. Key infrastructure development with wider community benefits, or that which increases flood risk resilience will be permitted.</p> |
| <p>Steer new development to those areas with the lowest risk of flooding from any source. If this is not possible, the exception test may have to be applied, informed by the potential vulnerability of the site and of the development proposed. Where this is the case, sites need to demonstrate that the development would provide wider sustainability benefits outweighing the flood risk and that the development would be safe for its lifetime without increasing flood risk elsewhere (and</p> | <p>NPPF Para 162, 163, 164 and NPPF Annex 3</p> | <p>The Local Plan does not identify or allocate specific sites and therefore site that come forward will be considered on a case by case basis. Policy CC-D1 – Flood Risk states that development proposals will be permitted where they are consistent with the sequential test and can demonstrate the site is at little or no risk of flooding. Proposals must not result in an increased flood risk elsewhere or impact upon land use for current or future flood management. Proposals should reduce the risk of flooding through layout, design and sustainable drainage systems to minimise surface water run-off and pollution.</p> <p>Decisions on development proposals will be taken in accordance with Local Plan policies. National policy, including the NPPF will be a material consideration and accorded appropriate weight in decision-making. The Environment Agency as statutory consultee provides standing advice and consultation responses on flood risk.</p> |

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| where possible will reduce flood risk overall). | | |
| Avoid inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast. | NPPF Para 171 | <p>Policy CC-S2 – Coastal Development states that development proposals should avoid areas at risk from coastal change. Where development at the coast is permitted, it will need to demonstrate that it is not within an area identified as at risk (including CCMA) and would not increase the risk to life and property or affect the natural coastal processes on any part of the coastline (clause 2d). Development leading to an increase in coastal erosion will not be permitted. A Coastal Change Management Area (CCMA) is designated at Porlock Weir as set out in Policy CC-S3, under which permanent new residential development will not be permitted. Key infrastructure development with wider community benefits, or that which increases flood risk resilience will be permitted.</p> <p>Policy CC-S4 – Replacement Development from Coastal Change Management Areas permits replacement development within CCMA where it is important to the well-being of the coastal community and is not within an area likely to be affected by physical coastal changes. The proposal must not result in unacceptable impacts on landscape, biodiversity, environment or local communities.</p> |
| <i>Natural environment</i> | | |
| Contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils, recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services. | NPPF Para 174 | <p>Exmoor National Park has two statutory purposes including to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park.</p> <p>The intrinsic character and beauty of the countryside is therefore implicitly part of conserving and enhancing Exmoor National Park which is designated as a rural area in its entirety. Policy GP3 Spatial Strategy determines how new development is considered spatially. It seeks to conserve the intrinsic character and beauty of the countryside by defining ‘named’ settlements to where most development is directed to sustain communities and local services and to help reduce the need to travel.</p> |

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| | | <p>The remaining areas of the National Park are ‘open countryside’ – policies provide for more limited levels of development where its location in the open countryside is essential or proposals related to the reuse existing buildings. In this way the intrinsic character and beauty of the countryside are recognised.</p> <p>Policy CE-S1 and Policy CE-D1 seek to ensure that the natural beauty of Exmoor is conserved and enhanced. Section 4 of the Local Plan refers to the Landscape Character Assessment (LCA), that defines landscape character areas, and the specific quality objectives and actions for Exmoor’s landscape. The characteristics stated in the LCA help to inform proposals, to ensure that they are appropriate.</p> <p>NPPF Paragraph 174 a) <i>‘protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)’.</i></p> <p>The Local Plan Vision (4) seeks to avoid soil erosion. Objective 7 says: To conserve and enhance Exmoor’s natural resources and to improve air and water quality, conserve water resources, ensure soils are in good condition, maximise carbon storage, and minimise pollution.</p> <p>Policy CE-S3 Biodiversity and Green Infrastructure, sets out that the conservation and enhancement of wildlife, habitats and sites of geological interest within Exmoor NP will be given great weight. The Local Plan applies to internationally and nationally designated sites and identifies the different levels of protection which apply to the hierarchy of site designations. These include SACs, EZIs and SSSIs. Policy CE-S3 requires protection of designated sites to be commensurate with their status.</p> <p>NPPF Paragraph 174 b) <i>‘recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland’</i></p> <p>Section 4 of the Local Plan, p.41, refers to ‘Landscape Resilience’, which explains how the Landscape Character approach to development and land use change will help to ensure that landscapes are effective at mitigating and/or adapting to the effects of climate change. Forests and woodlands are important for achieving a resilient and coherent ecological network.</p> |

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| | | <p>Policy GP4 The Efficient Use of Land and Buildings seeks to protect the best and most versatile agricultural land.</p> <p>NPPF Paragraph 174 c) <i>‘maintaining the character of the undeveloped coast, while improving public access to it where appropriate’</i></p> <p>Section 4 of the Local Plan refers to the Heritage Coast - unspoilt stretches of the coast line.</p> <p>Policy CE-S1 requires that development proposals should have regard to, and be appropriate, in terms of impact on the heritage coast. Policy CE-D1 requires development to be appropriate to its coastal location and conserve the undeveloped nature of the coast consistent with Heritage Coast purposes.</p> <p>NPPF Paragraph 174 d) <i>‘minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.’</i></p> <p>Policy CE-S3 sets out as a basic principle, that all development should avoid harm to biodiversity or geological interest. In exceptional circumstances, where the wider benefits of a proposal outweigh the loss or damage to a site, compensation measures will be sought to minimise the impacts and compensate.</p> <p>In addition, the Policy, encourages the enhancement of biodiversity and the creation of green infrastructure networks, at a variety of spatial scales, including cross boundary.</p> <p>Supporting text in paragraphs 4.68-4.84 of Policy CE-S3 establish the existing ecological networks, which development proposals are encouraged to support.</p> <p>Policy CE-D2 also requires development proposals to include measures that will enhance green infrastructure provision.</p> <p>NPPF Paragraph 174 e) <i>‘preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local</i></p> |

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| | | <p><i>environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans'</i></p> <p>Policy CC-S7 Pollution refers to different types of pollution including air, soil, water, light and noise. The Policy requires for new development to seek to avoid pollution, through preventative measures. The Policy encourages new development to seek to reduce pollution and to include measures to improve the quality of the surrounding environment and resources.</p> <p>Policy CC-D2 Water Conservation refers to the River Basin Management Plan (RBMP) for the South West River Basin district. This RBMP encourages sustainable water management and promotes the use of sustainable drainage systems in new development. The Policy is informed by this RBMP and sets out policies that requires conserving water resources for Exmoor.</p> <p>NPPF Paragraph 174 f) <i>'remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.</i></p> <p>Policy CC-S7 Pollution refers to contaminated land and says that, when determining planning applications for land that may be contaminated, the NPA will consider whether the proposal takes account of contamination and what actions will be taken to remediate land to protect the environment and health of future users, if contamination is found.</p> <p>Policy CC-D5 Sewerage Capacity and Sewage Disposal requires that development proposals for, or which require new or extended sewerage infrastructure, to demonstrate that the facility will satisfy criteria including 1b) the use of necessary mitigation measures (including climate change resilience measures), to avoid impacts on surrounding areas including noise, air, soil and water pollution, odour, litter, visual intrusion, and other disturbances.</p> <p>In relation to the stability of land, clause 3h) of Policy GP1: Achieving National Park Purposes and Sustainable Development says particular attention will be paid to maintaining the quality of natural resources and <i>ensuring ground conditions are acceptable</i>; Policy CE-S7 Small Scale Working or Reworking for Building and Roofing Stone requires that operations will not have unacceptable adverse impacts on quarry-slope stability.</p> |

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| <p>Plans should: distinguish between the hierarchy of international, national and locally designated sites, take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure, and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.</p> | <p>NPPF Para 175</p> | <p>The Preamble to Policy CE-S3 sets out the hierarchy of international, national and locally designated sites. It also has a table showing Exmoor’s Priority Habitats. The Policy sets out the weight that should be accorded to each site when considering proposed development, and the principles that proposals should follow.</p> <p>The preamble to Policy CE-S3, refers to the ecological networks that exist both within and outside of the Park, including the Somerset ecological network, and the North Devon Biosphere Reserve. The policy encourages the delivery of green infrastructure, with the support of partner organisations, to provide an effective basis for the enhancement of existing multifunctional green infrastructure networks, and to enable the creation of physical and functional network linkages throughout the National Park and beyond.</p> <p>Clause 6 of Policy CE-S3, seeks the enhancement of biodiversity and the creation of green infrastructure networks across a variety of spatial scales, including cross boundary.</p> <p>Clause 8 of Policy CE-S3 also requires that green infrastructure be incorporated into dispersal areas which are identified as being an integral part of the ecological network.</p> |
| <p>Great weight should be given to National Parks, the Broads and the Areas of Outstanding Natural Beauty. The scale and extent of development within these designated areas should be limited. Development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.</p> <p><i>(N.B this para has been added as it is specific to National Parks)</i></p> | <p>NPPF Para 176</p> | <p>Paragraph 176 incorporates provisions that have been carried forward from previous versions of the NPPF. However new provisions include specific wording relating to scale and extent of development being limited and specific reference to the <i>settings</i> of AONBs and National Parks which should be designed to avoid or minimise adverse impacts on the designated areas.</p> <p>The Exmoor National Park Local Plan seeks to limit the scale and extent of development. It includes an <i>indicative figure</i> for affordable housing not a target. Policy HC-S1 Housing says that new housing is provided for exceptionally – and will be limited through addressing local community needs - not meeting open market demand.</p> <p>Policy GP3 Spatial Strategy sets out the spatial strategy and directs most development to named settlements to protect the open countryside hence it sets out the extent of where development is appropriate. Other Plan policies distinguish between development in named settlements and the open countryside.</p> |

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| | | <p>Exmoor National Park Authority responds to consultations on development proposals in the setting outside the National Park in neighbouring local planning authority areas. Relevant, including public authorities, are legally required to have regard to National Park purposes in carrying out their functions.</p> |
| <p>Conserve the special character and importance of Heritage Coast areas.</p> | <p>NPPF Para 178</p> | <p>The whole Exmoor coastline was defined as a Heritage Coast in 1991 and the purposes of a heritage coast are compatible with that of the statutory National Park purposes. Policy CE-S1 – Landscape and Seascape Character states that development proposals will need to have regard to the Heritage Coast and be appropriate in terms of their impact on in terms of the conservation of heritage Coasts as a significant landscape and seascape attribute. Policy CE-D1 – Protecting Exmoor’s Landscapes and Seascapes requires that development within Exmoor’s Heritage Coast should be appropriate to the coastal location and conserve the undeveloped nature of the coast consistent with the Heritage Coast purposes.</p> |
| <p>Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species, and identify and pursue opportunities for securing measurable net gains for biodiversity.</p> | <p>NPPF Para 179</p> | <p>Policy GP1 Achieving National Park Purposes and Sustainable Development says that Sustainable development for Exmoor National Park will <u>conserve and enhance</u> the National Park, its natural beauty, <u>wildlife</u> and cultural heritage and its special qualities;</p> <p>Policy CE-S3 Biodiversity and Green Infrastructure identifies Exmoor’s Priority Habitats, (set out in Table 4.1). The supporting text for Policy CE-S3 identifies national, international and local designated sites of importance for biodiversity. Accordingly, Policy CE-S3, criterion 3, sets out that protection will be commensurate with their status, giving appropriate weight to their importance and hierarchy.</p> <p>The Local Plan Policies map includes designated sites (SSSIs, SACs, RIGs) and local wildlife sites as well as Section 3 land and veteran trees.</p> <p>The Local Plan references the 2015 report on Somerset ecological network mapping which maps 4 priority habitats</p> <p>- <i>Somerset County Council et al. (2015) Somerset’s Ecological Networks: Mapping Components of the ecological network in Somerset (and associated maps for Exmoor National Park)</i> Microsoft</p> |

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| | | <p>Word - Somerset Ecological Networks Report 2015.docx (exmoor-nationalpark.gov.uk) and associated maps:</p> <ul style="list-style-type: none"> - Broad-leaved Woodland Ecological Network Map - Heath and Acid Grassland Ecological Network Map - Priority Grassland Ecological Network Map - Fen, Marsh and Swamp Ecological Network Map <p>It also references the:</p> <ul style="list-style-type: none"> - <i>Exmoor Wildlife research and Monitoring Framework 2014-2020</i> and ‘<i>Exmoor Biodiversity Action Plan</i>’ including priority <p>The supporting text to Policy CE-S3, paragraphs 4.70, 4.71, 4.72, and 4.79 identifies wildlife corridors and stepping stones that connect them. Policy CE-S3 says that development delivery, management agreements and positive initiatives will <u>conserve, restore and re-create</u> priority <u>habitats</u> and conserve and increase priority species identified for Exmoor in the Exmoor Wildlife Research and Monitoring Framework (or successor publication). Criterion 6, encourages the enhancement of biodiversity and the creation of multi-functional green infrastructure networks at a variety of spatial scales, including cross boundary areas. Although the term ‘net gain’ is not explicitly used, through reference to conservation, enhancement, restoration, recreation and increases, Plan policies apply this principle.</p> <p>Policy CC-D2 Green Infrastructure Provision encourages the provision of green infrastructure as an essential component of new development that also incorporates benefits for biodiversity at a commensurate scale. Policy CE-S3 also promotes the conservation and enhancement of priority habitats and ecological networks. The designated areas are given protection in accordance with their weight as part of Policy CE-S3, criterion 3.</p> <p>The supporting text to Policy CE-D2 specifies ways in which proposals can add value to biodiversity.</p> |
| Ensure that a site is suitable for its proposed use taking account of ground conditions, any risks arising from land | NPPF Para 183 & 185 | Policy GP1 – Achieving National Park Purposes and Sustainable Development states that when taking opportunities to contribute to sustainable development, particular attention will be paid to “maintaining the quality of natural resources and ensuring ground conditions are acceptable” (clause |

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| <p>instability and contamination, and the likely effects of pollution on health, living conditions and the natural environment.</p> | | <p>3h) and “supporting the health and socio-economic wellbeing of local communities and encouraging community participation” (clause 3j).</p> <p>Policy CE-S7 – Small Scale Working or Re-Working for Building and Roofing Stone states operations in relation to small scale quarries much not have unacceptable adverse impacts on the natural and historic environment or human health, the impacts on the flow and quantity of surface and groundwater and the migration of contamination from the site. It requires that operations will not have unacceptable adverse impacts on quarry-slope stability.</p> <p>In relation to waste, the pre-amble to Policy CC-S6 – Waste Management sets out that large scale specialised processing sites such as composting or recycling plants, would be inappropriate within the National Park due to the potential adverse impacts on landscape, alongside air, water and land contamination (para 5.109).</p> <p>Policy CC-D5 – Sewerage Capacity and Sewage Disposal requires that new or extended sewerage infrastructure does not pose unacceptable public health, amenity or environmental quality harm and that necessary mitigation measures are used to avoid impacts on noise, air, soil and water pollution.</p> <p>Policy CC-S7 – Pollution requires that where pollution in development proposals cannot be avoided, there will be no unacceptable adverse impacts, either individually or cumulatively on the environment (including groundwater source protection zones and natural resources). Reference to how this may be achieved is identified in clause 2c) as “remediating contaminated land before development proceeds (in the case of proposals on or affected by contaminated land)”. The pre-amble to this policy refers extensively to contamination, including identifying the impacts of soil pollution (para 5.142), the consideration given when determining proposals (para 5.143/5.146) and the areas which can be affected by contamination (para 5.144). In particular reference to remediation and contamination, para 5.146 states “<i>when determining planning applications for land that may be contaminated, the NPA will consider whether the proposal takes acceptable account of contamination and what actions will be taken to remediate land to protect the environment and health of future users if contamination is found</i>” .</p> |

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| <p>Sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas.</p> | <p>NPPF Para 186</p> | <p>Policy CC-S7 Pollution addresses air pollution. The supporting text in paragraph 5.173 and 5.138, explains that District Councils have a statutory duty for Local air quality management. ENPA is a local planning authority but not a district council. There are no Air Quality Management Areas (AQMA) within Exmoor.</p> <p>The supporting text to Policy CC-S7, paragraph 5.140 identifies that some development proposals may impact air pollution through the transport network. Policy AC-D1 Sustainable Transport addresses this and seeks opportunities for the traffic network to improve air quality, by encouraging sustainable modes of transport, low carbon travel, and provision for walking, cycling, and horse riding including linkages with neighbouring authorities.</p> <p>Policy CE-S3 Biodiversity and Green Infrastructure, encourages opportunities for habitat management, restoration, and expansion of green infrastructure networks that enable habitats and species to adapt to climate change or to mitigate the effects of climate change. The supporting text to paragraph 4.83 explains that climate mitigation can be achieved through woodland planting and mire restoration.</p> <p>Other approaches to help to improve air quality are also acknowledged in paragraph 5.140, which draws attention to Policy CE-S6, and Policy CC-S5, that encourages and supports low carbon development, and energy efficiency in building design.</p> <p>The NPA ensures environmental and habitat assessments are taken account of in decision making to that air and other environmental quality limits are complied with.</p> |
| <p>Ensure that new development can be integrated effectively with existing businesses and community facilities.</p> | <p>NPPF Para 187</p> | <p>Policy GP3 - Spatial Strategy provides opportunities for named settlements to grow and for new development to be effectively integrated within existing communities. The supporting text explains that the overall aim of the spatial strategy is to ensure Exmoor’s communities are sustained over the longer term through appropriate development of a scale that is proportionate to their location and the socio-economic needs of their communities (para 3.29). It notes that Exmoor’s settlements exist at a rural level beneath most conventional settlement hierarchies, therefore providing scope for exceptional development such as to meet local needs affordable housing (para 3.33). In smaller named settlements ‘Villages’, development will help maintain or enhance communities by providing</p> |

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| | | <p>for a diverse economy helping to retain and enhance key services and facilities and addressing the needs of local communities (para 3.38).</p> <p>Policy CE-S6 – Design and Sustainable Construction Principles identifies design principles including the use and activity of the development not to detrimentally affect the amenity of surrounding properties/occupiers from overlooking, daylight loss, overbearing appearance and other adverse environmental impacts.</p> <p>Policy HC-S7 – Residential Institutions requires proposals for new residential institutions to have regard to the location and level of services and facilities that may be required to support the proposed use. The supporting text also requires that residential institutions, such as care homes, created through a change of use should be located in Local Service Centres to enable access to essential facilities including health services, shops and bus routes.</p> <p>A range of Local Plan policies have locational requirements to ensure that development is sensitively sited and well-related to existing settlements or communities to ensure they are integrated effectively within the community and there is access to services and facilities. These include housing policies: HC-S1 – Housing; HC-S4 – Principal Residence Housing; HC-D2 – Conversions to Dwellings in Settlements; HC-D3 – New Build Dwellings in Settlements; HC-D4 – Accessible and Adaptable Housing for Exmoor’s Communities; HC-D5 – Extended Family Dwellings Criteria; HC-D6 – Custom/Self Build Local Need Housing; HC-D7 – Conversions to Dwellings in the Open Countryside; and HC-D8 – New Build Dwellings in the Open Countryside. Economy, community and tourism policies with locational requirements include: HC-S6 – Local Commercial Services and Community Facilities; HC-D18 – Local Commercial Service Provision; HC-D19 – Safeguarding Local Commercial Services and Community Facilities; SE-S2 – Business Development in Settlements; SE-S3 – Business Development in the Open Countryside; SE-S4 – Agricultural and Forestry Development; RT-D5 – Tented Camp Sites; RT-D6 – Camping Barns; RT-D7 – Certificated Caravan and Touring Caravan Sites; and RT-D10 – Recreational Development.</p> |
| <i>Historic Environment</i> | | |

| A. NPPF Requirement | B. NPPF Paragraph Reference | C. Assessment results |
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| <p>Set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.</p> | <p>NPPF Para 190</p> | <p>The Local Plan includes policies that guide development to make the best use of land and buildings including through the appropriate reuse of existing buildings, including heritage assets which may otherwise fall into disrepair. There are also additional ways in which the management and upkeep of heritage assets can be ensured which fall outside of the planning system.</p> <p>Policy GP1 – Achieving National Park Purposes and Sustainable Development sets out a positive strategy for the historic environment as sustainable development conserving and enhancing the National Park and its cultural heritage. When considering opportunities that contribute to the sustainable development of the National Park, particular attention will be paid to ensuring the design, intensity and use is appropriate to the character and appearance, and to the impact on the character and setting of the site and/or buildings.</p> <p>Policy CE-S4 – Cultural Heritage and Historic Environment recognises the importance of Exmoor’s local distinctiveness, cultural heritage and historic environment and ensures its conservation and enhancement for present and future generations to enjoy. The policy sets out that proposals affecting heritage assets will be considered in a manner appropriate to their significance including designated conservation areas, scheduled monuments, listed buildings, registered historic parks and gardens and locally important historic sites and features. Proposals should positively reinforce the historic character of Exmoor’s settlements through reflecting the traditional vernacular architecture and enhancing local distinctiveness.</p> <p>The supporting text for this policy also emphasises the fragility and vulnerability of the historic environment and its sensitivity to change. It is recognised that historic buildings can easily be destroyed through inappropriate repair and redevelopment or through neglect (para 4.92). Threats can also arise from permitted development and as such, consideration is given to whether an archaeological interest can be protected through the withdrawal of permitted development rights (para 4.98).</p> <p>Policy CE-D3 – Conserving Heritage Assets applies to development affecting conservation areas, principal archaeological landscapes and heritage assets and their settings. Proposals in conservation areas should ensure the character or appearance of the area is preserved or enhanced. Proposals affecting heritage assets should demonstrate a positive contribution to their setting and promote</p> |

| A. NPPF Requirement | B. NPPF Paragraph Reference | C. Assessment results |
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| | | <p>enjoyment and understanding of assets whilst avoiding unacceptable adverse impacts. The policy also seeks to protect heritage assets from the effects of climate change through encouraging proposals that will adapt to, or mitigate the effects of, climate change to safeguard the heritage asset over the longer term.</p> <p>Policy CE-S5 – Principles for the Conversion or Structural Alteration of Existing Buildings says that proposals for the conversion or structural alteration of traditional buildings should ensure the historic fabric and architectural interest of the buildings and setting, including retaining existing traditional and historic features, are conserved and enhanced.</p> |
| <i>Minerals</i> | | |
| <p>Provide for the extraction of mineral resources of local and national importance.</p> | <p>NPPF Para 210</p> | <p>The National Park Authority is the Minerals Planning Authority within the National Park and determines applications for minerals related development. At present there are no operative mines or quarries within the National Park, although there are a number of disused quarries which were primarily used for local building stone. Small scale working or re-working for building and roofing stone is encouraged under Policy CE-S7 where there is a demonstratable need in order to provide a local source of building and roofing stone.</p> <p>With the exception of small-scale extraction of building roofing stone, minerals development is not appropriate within the National Park due to the adverse impacts on National Park purposes. Only proposals in accordance with Polices CE-S7 and CE-D7 (Interim Development Order Permissions) are permitted unless there are exceptional circumstances. No known mineral reserves of national importance exist on Exmoor.</p> |
| <p>Take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before</p> | <p>NPPF Para 210</p> | <p>Development involving the prior extraction of materials is not relevant with the National Park. Despite a long history of mineral extraction on Exmoor, at present there are no operative mines or quarries within the National Park. Mineral related development of small-scale extraction of building roofing stone is permitted under Policy CE-S7 where there is a demonstratable need to provide a</p> |

| A. NPPF Requirement | B. NPPF Paragraph Reference | C. Assessment results |
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| considering extraction of primary materials. | | local source of building or roofing stone. Aside from this, minerals development is not appropriate within the National Park due to the adverse impacts on National Park Purposes. |
| Safeguard mineral resources by defining Mineral Safeguarding Areas and Mineral Consultation Areas. | NPPF Para 210 | Exmoor National Park Authority has not defined Minerals Safeguarding Areas, which are known locations of specific minerals resources of local and national importance, identified to ensure that they are not needlessly sterilised by non-mineral development. Within the National Park sources of the local resource of building stone are identified in the Building Stone Atlas of Somerset and Exmoor and consist of a large number of small derelict building stone quarries. While a few of these derelict quarries may retain the appearance of a quarry, many others will have been reclaimed by vegetation or in-filled. In the National Park, the need for minerals safeguarding is not considered to be as significant as it is in locations with higher expectations of mineral working and general development. Since new development in the National Park is extremely limited, and the demand for local building stone is low, there is very little risk of sterilising the available mineral resource given the extent of the resource across the National Park. |
| Encourage the prior extraction of minerals, where practical and environmentally feasible, if it is necessary for non-mineral development to take place. | NPPF Para 210 | Development involving the prior extraction of materials is not relevant with the National Park. Despite a long history of mineral extraction on Exmoor, at present there are no operative mines or quarries within the National Park. Mineral related development of small-scale extraction of building roofing stone is permitted under Policy CE-S7 where there is a demonstratable need to provide a local source of building or roofing stone. Aside from this, minerals development is not appropriate within the National Park due to the adverse impacts on National Park Purposes. |
| Safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals, the manufacture of concrete and concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material. | NPPF Para 210 | Development outlined in NPPF paragraph 210(e) is not relevant within the National Park. Despite a long history of mineral extraction on Exmoor, at present there are no operative mines or quarries within the National Park. Mineral related development of small-scale extraction of building roofing stone is permitted under Policy CE-S7 where there is a demonstratable need to provide a local source of building or roofing stone. Aside from this, minerals development is not appropriate within the National Park due to the adverse impacts on National Park Purposes. |

| A. NPPF Requirement | B. NPPF Paragraph Reference | C. Assessment results |
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| Set out criteria or requirements to ensure that permitted and proposed operations do not have unacceptable adverse impacts on the natural and historic environment or human health | NPPF Para 210 | <p>The National Park Authority is the Minerals Planning Authority within the National Park and hold responsibility in determining applications for minerals related development. At present there are no operative mines or quarries within the National Park, although there are a number of disused quarries on Exmoor which were primarily used for local building stone. Small scale working or re-working for building and roofing stone is encouraged under Policy CE-S7 where there is a demonstratable need in order to provide a local source of building and roofing stone. Under this policy, it must be clearly demonstrated that such development would not adversely affect the landscape character, wildlife, cultural heritage, geodiversity, or health and amenity of local communities. Additionally, development must not have unacceptable adverse impacts on the natural and historic environment or human health, including from noise, dust, visual intrusion, flood risk and contamination.</p> <p>Policy CE-S8 – Mineral Development requires that any such development will be subject to a planning obligation to ensure any unavoidable dust, noise and particle emissions and blasting vibrations are controlled, mitigated and removed at source.</p> <p>With the exception of small-scale extraction of building roofing stone, minerals development is not appropriate within the National Park due to the adverse impacts on National Park purposes. Only proposals in accordance with Polices CE-S7 and CE-D7 (Interim Development Order Permissions) are permitted unless there are exceptional circumstances otherwise.</p> |
| Recognise that some noisy short-term activities, which may otherwise be regarded as unacceptable, are unavoidable to facilitate minerals extraction | NPPF Para 210 | <p>The tranquillity of the National Park is an identified special quality and it is important to maintain this for the enjoyment and understanding of those using the National Park. At present there are no operative mines or quarries within the National Park, although there are a number of disused quarries on Exmoor which were primarily used for local building stone. Small scale working or re-working for building and roofing stone is encouraged under Policy CE-S7 where there is a demonstratable need in order to provide a local source of building and roofing stone. In accordance with this policy, development must ensure unavoidable dust, noise and particle emissions and blasting vibrations are either controlled, mitigated or removed at source and appropriate noise limits</p> |

| A. NPPF Requirement | B. NPPF Paragraph Reference | C. Assessment results |
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| | | are established for extraction in proximity to noise sensitive properties. This is also required through Policy CE-S8 – Mineral Development and CE-D7 – Interim Development Order Permissions . |
| Ensure that worked land is reclaimed at the earliest opportunity, taking account of aviation safety, and that high-quality restoration and aftercare of mineral sites takes place. | NPPF Para 210 | <p>The National Park Authority is the Minerals Planning Authority for the area in the National Park and is responsible for determining applications for minerals related development. At present there are no operative mines or quarries within the National Park, although there are a number of disused quarries on Exmoor which were primarily used for local building stone. Small scale working or re-working for building and roofing stone is encouraged under Policy CE-S7 where there is a demonstratable need in order to provide a local source of building and roofing stone.</p> <p>With the exception of small-scale extraction of building roofing stone, minerals development is not appropriate within the National Park due to its adverse impacts on National Park purposes. Only proposals in accordance with Polices CE-S7 and CE-D7 (Interim Development Order Permissions) are permitted unless there are exceptional circumstances. Policy CE-S8 – Mineral Development ensures that proposals for mineral development include a scheme for restoration and after-use to be submitted with the application in order to ensure high environmental standards and the conservation and enhancement of the landscape character, geodiversity, biodiversity and the historic environment.</p> |

| A. PPG | B. PPG Paragraph Reference | C. Assessment results |
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| <p>How can planning policies support sustainable rural communities?</p> <p>A wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development in some</p> | 009/ 67-009-20190722 | <p>Policy GP3 Spatial Strategy identifies ‘named settlements’. Para 3.33 notes that the [named] settlements exist at a rural level beneath most conventional settlement hierarchies and that the three largest settlements in the National Park have populations below 1500. Most of Exmoor’s named settlements have populations of a few hundred or less and this approach means that there are, in principle, opportunities for appropriate growth to address local needs in all of Exmoor’s villages. Para 3.38 says that development in ‘Villages’ will help maintain or enhance</p> |

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| <p>types of settlement will need to be supported by robust evidence of their appropriateness.</p> <p>Local planning authorities can support opportunities to bring forward rural exception sites by working proactively with landowners and potential delivery partners such as parish councils and community land trusts</p> | | <p>their communities by providing for a diverse economy helping to retain and enhance key services and facilities and addressing the needs of local communities.</p> <p>The housing strategy set out in Policy HC-S1: Housing says that new housing will be delivered “exceptionally” through a needs led rural exceptions approach (consistent with the rural exceptions approach in the NPPF). The strategy is to deliver local needs affordable housing without a target or allocations. Instead, the Local Plan contains an affordable housing “indicative figure”. Housing delivery responds to identified local housing need using up to date evidence in parish housing need surveys. This is explained in paragraphs 6.30-6.38 of the plan.</p> <p>HC-S1 and associated housing policies, provide a policy framework that is based on addressing the needs of the local community. The approach was developed from a wide range of evidence that took account of affordability and local housing need.</p> <p>As the local planning authority (though not the housing authority), the NPA works in partnership to support the delivery of local need affordable housing. This includes working with parish councils and local groups / communities including the 8 Parishes Affordable Housing Working Group, Exmoor Young Voices and Parracombe CLT, the housing authorities, housing providers and the Exmoor Rural Housing Network, as well as through providing pre-application advice. Support /advice is also being provided to CLTs and landowners as appropriate.</p> |
| <p>Where can rural exception sites come forward?</p> <p>As set out in the National Planning Policy Framework, rural exception sites can come forward in any rural location. In designated rural areas and areas designated as Green Belt, rural exception sites are the only sort of exception site than can come forward.</p> | <p>011/ 67-011-20210524</p> | <p>The housing strategy set out in Policy HC-S1: Housing says that new housing will be delivered “exceptionally” through a needs led rural exceptions approach (consistent with the rural exceptions approach in the NPPF).</p> <p>Policy GP3 Spatial Strategy identifies ‘21 named settlements’. Para 3.33 notes that the [named] settlements exist at a rural level beneath most conventional settlement hierarchies and that the three largest settlements in the National Park have populations below 1500. Most of Exmoor’s named settlements have populations of a few hundred or less and this approach means that there are, in principle, opportunities for appropriate growth to address local needs in all of Exmoor’s villages. Para 3.38 says that development in ‘Villages’ will help maintain or enhance their communities by providing for a diverse economy helping to retain and enhance key services and facilities and addressing the needs of local communities.</p> <p>Plan policies provide a flexible approach to maximise opportunities for new local need affordable housing while conserving and enhancing the National Park. As there is no housing target (the Plan</p> |

contains an indicative figure for affordable housing only), and no allocations, a rural exceptions approach applies to sites / buildings across the National Park.

New local need affordable housing can be achieved through the change of use of existing buildings or as new build

In '**Named Settlements**' new local need affordable housing can be in or adjoining a settlement:

- through the reuse of an existing building where it is well related to existing buildings (**Policy HC-D2 Conversion to Dwellings in Settlements**)
- as new build housing where the site is well related to existing buildings and any development would conserve or enhance the character of the traditional settlement pattern (**Policy HC-D3 New Build Dwellings in Settlements**)

In the **open countryside** new local need affordable housing can be:

- through the reuse of an existing building in a hamlet or farmstead where there is an existing dwelling. (**Policy HC-D7 Conversions to Dwellings in the Open Countryside**)
- as new build including custom/self-build housing in a rural community in the open countryside where the site is well related to existing buildings, any development is proportionate in scale and it would conserve or enhance the traditional pattern of the rural community (**Policy HC-D6 Custom /Self Build Local Need Housing**)

Rural communities are small rural communities which are not identified in the spatial strategy, but have an established, closely grouped number of dwellings within a contiguous built form, and are separate from other named settlements, and include service provision in the form of a shop, pub or community meeting place/hall.

Hamlets are an established, closely grouped number of dwellings within a contiguous built form and separate from other named settlements.

Farmsteads are a clear grouping of farm buildings with an existing dwelling.

Local need affordable housing can also be achieved through the **replacement of occupancy ties (Policy HC-D12 Replacement of Rural Workers Occupancy Conditions, and Policy HC-D13 Replacement of Holiday Occupancy Conditions and Extended Family Occupancy Ties).**

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| <p>What sorts of affordable housing can be delivered on rural exception sites?</p> <p>Rural exception sites should seek to address the affordable housing needs of local communities. They can be used to deliver any form of affordable housing, including First Homes, provided this is supported by appropriate evidence of local need, such as a local housing needs survey.</p> | <p>012/ 67-012-20210524</p> | <p>The housing strategy set out in Policy HC-S1: Housing says that new housing will be delivered “exceptionally” through a needs led rural exceptions approach (consistent with the rural exceptions approach in the NPPF). The strategy is to deliver local needs affordable housing without a target or allocations. Instead, the Local Plan contains an affordable housing “indicative figure”. Housing delivery responds to identified local housing need using up to date evidence in parish housing need surveys. This is explained in paragraphs 6.30-6.38 of the plan. Associated Local Plan affordable housing policies include Policies HC-D2, HC-D3 and HC-S3.</p> <p>There is no requirement to provide for First Homes. The PPG says that <i>First Homes exception sites</i> cannot come forward in areas designated as designated rural areas as defined in Annex 2 of the National Planning Policy Framework. In these areas rural exception sites are the sole permissible type of exception site. <i>Annex 2 of the NPPF defines Designated Rural areas as National Parks, AONBs and areas designated as rural under Section 157 of the Housing Act 1985.</i></p> <p>In practice, in Exmoor National Park, Local Plan policies provide for a range of affordable housing tenures if they are affordable to meet local needs including rented, shared ownership and owner occupied including self/custom build housing where there is evidence of a local need.</p> |
| <p>Can rural exception sites deliver market housing?</p> <p>Rural exception sites can deliver a small proportion of market housing, provided that it can be demonstrated that this is necessary in order to ensure the overall viability of the site. Local authorities and neighbourhood planning groups are encouraged to produce policies that specify in further detail the proportions of market housing would be considered acceptable, and under what circumstances.</p> <p>Other than allowing for market housing, what other ways can the viability of rural</p> | <p>013/ 67-013-20210524</p> | <ul style="list-style-type: none"> - Policy HC-S1 Housing specifies the circumstances in which market (as Principal Residence) housing may be considered to help deliver local need affordable housing (on sites or two or more new build or through a conversion. - Policy HC-D2 Conversion to Dwellings in Settlements and Policy HC-D3 New Build Dwellings in Settlements require that where an element of Principal Residence housing is proposed, <ul style="list-style-type: none"> – it is clearly and robustly demonstrated that an element of Principal Residence market housing is required to enable delivery of local need affordable housing which cannot be made financially viable without it; and – it is the minimum number of Principal Residence market dwellings required to support the delivery of the required affordable housing and will maximise the proportion of affordable homes within viability constraints. <p>It is intended that affordable housing guidance on the delivery of local need affordable housing will be produced.</p> |

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| <p>exception sites be improved? Where a local authority is satisfied because of the evidence provided that a rural exception site would not be viable if it were required to deliver only affordable housing, they may wish to consider whether alternative approaches to securing site viability could be pursued. This could include (but is not limited to):</p> <ul style="list-style-type: none"> • allowing for flexibility in tenure, size, or type of housing to be provided • allowing for flexibility in the phasing of the development • accepting the provision of a commuted sum to be used for provision of affordable housing on another site or sites • obtaining other sources of funding such as grants <p>Plan-making authorities are encouraged to set policies that set out in greater detail the circumstances in which alternative approaches to viability would be considered.</p> | | <p>Plan policies require that in terms of size and type, the affordable housing and mix of Principal Residence market housing is in accordance with Policy HC-S2 A Balanced Local Housing Stock. The number, type and affordable tenure of local need housing will be based on evidence of local need. Viability of schemes will be judged on a case by case basis using an ‘open book’ approach</p> <p>The affordable housing and Principal Residence market housing are required to be indistinguishable and fully integrated on the development site. Commuted sums to fund affordable housing elsewhere in the National Park may be considered for conversions where the proposal will support more units than the number of affordable local need housing units that evidence shows is needed.</p> <p>The Local Plan makes clear that Principal Residence housing will only be acceptable where other sources of funding e.g., grants or cross subsidy from outside the National Park are not available.</p> |
| <p>How can land for rural exception sites be identified?</p> <p>Organisations, local authorities, or individuals seeking to bring forward rural exception sites are encouraged to take a proactive approach to identifying suitable locations for rural exception site delivery through such measures as:</p> | <p>014/ 67-014-20210524</p> | <p>As the local planning authority (though not the housing authority), the NPA works in partnership to support the delivery of local need affordable housing. This includes working with parish councils and local groups / communities including the 8 Parishes Affordable Housing Working Group, Exmoor Young Voices and Parracombe CLT, the housing authorities, housing providers and the Exmoor Rural Housing Network, as well as through providing pre-application advice. Support /advice is also being provided to CLTs and landowners as appropriate.</p> |

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| <ul style="list-style-type: none"> actively seeking the details of relevant landowners and approaching them directly, in order to determine their level of interest in putting their sites forward for such developments working in collaboration with local communities, parish councils and other relevant groups to identify and deliver rural exception sites | | |
| <p>How can rural exception site delivery be encouraged?</p> <p>Strategies for bringing forward rural exception sites will vary depending on local circumstances. However, where local authorities are keen to increase the number of rural exception sites that can come forward in their areas, or developers or landowners have site(s) that they wish to pursue, they may wish to consider establishing or strengthening working relationships with relevant groups including (but not limited to):</p> <ul style="list-style-type: none"> parish and town councils neighbourhood planning qualifying bodies housing associations local landowners <p>Close partnership working between these different groups may assist in managing expectations in terms of the timescales, financial rewards and resource commitments required for effective rural exception site delivery.</p> | <p>015/ 67-015-20210524</p> | <p>As the local planning authority (though not the housing authority), the NPA works in partnership to support the delivery of local need affordable housing. This includes working with parish councils and local groups / communities including the 8 Parishes Affordable Housing Working Group, Exmoor Young Voices and Parracombe CLT, the housing authorities, housing providers (including housing associations) and the Exmoor Rural Housing Network, as well as through providing pre-application advice. Support /advice is also being provided to CLTs and landowners as appropriate.</p> |