





# Employment Land Review Update


EXMOOR NATIONAL PARK LOCAL PLAN 2011 - 2031  
FOR SUBMISSION - MAY 2016

## Employment Land Review Update 2016

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## EMPLOYMENT LAND REVIEW UPDATE 2016

### 1. INTRODUCTION

- 1.1 This report is an update to the Employment Land Review (ELR) which was undertaken in 2009 by consultants, Nathaniel Lichfield. It is important for the Local Plan, given that there have been significant changes in planning policy, and the data used to inform the 2009 ELR is somewhat dated. This Update will therefore examine the changes that have taken place since the 2009 study, and assess whether the conclusions reached by the 2009 study are still valid, and therefore whether the policies in the Draft Publication Local Plan are still appropriate and justified.
- 1.2 The key aims of this update are to:
- a. update the local economic context;
  - b. update the policy and economic context;
  - c. review the existing employment land;
  - d. review the importance of other non-B class employment sectors to the Exmoor Economy; and
  - e. summarise and reassess the conclusions of the 2009 ELR study.

### Methodology

- 1.3 This Update is not intended to be a complete ELR, rather it serves as evidence to show that the approach in the Publication Draft Local Plan to the economy, is still appropriate in light of recent evidence and policy.
- 1.4 Much of the evidence in the 2009 ELR is still relevant.
- a. **Consultation:** The 2009 ELR undertook a review of past consultation exercises, business surveys and a stakeholder consultation and held discussions with local agents. Given that there has not been any significant changes to the Exmoor economy, as demonstrated by the secondary data used in this study, it is not considered necessary to undertake further primary research.
  - b. **A review of existing employment sites:** Given that there has been little change in the stock of employment space as demonstrated in section c, it does not seem reasonable to undertake further assessment in terms of undertaking a qualitative assessment of sites.
  - c. **The Economic Strategy:** The economic strategy as set out in the 2009 ELR is still relevant and looks to build upon links with the environment, promote and encourage non B class sectors, upon which the Exmoor economy depends, such as agriculture and tourism, and to promote new business sectors, which may generally be of small scale with limited space requirements.

- d. **Future need for employment space:** The 2009 ELR undertook Experian forecasts to forecast the future need for employment land to 2026. It concluded that the level of future employment development within Exmoor would be very limited, and that the forecasted small level of employment growth translated to a small requirement for additional business space, a trend that is clearly supported by what has happened in the past. As this study will show, very little has changed since 2009 and it is therefore not considered necessary to undertake further analysis.

1.5 This Update is structured as follows:

- i. **Local Context:** The 2009 ELR used the 2001 census figures as evidence, as this was the only evidence available at that time. This Update provides an update to those figures using the 2011 census to provide an economic profile of Exmoor providing information on population figures, economic activity, industrial activity, qualifications and travel to work.
- ii. **Planning Policy Context:** The starting point for the 2009 ELR study was the then (2004) DCLG Employment Land Review Guidance Note and Planning Policy Guidance 4 (PPG 4). These have now been superseded by the National Planning Policy Framework (NPPF) and Planning Practice Guidance Notes on Housing and Economic Development Needs Assessments and Housing and Employment Land Supply. More locally, the Regional Spatial Strategy (RSS) has been replaced by the Local Enterprise Partnership (LEP) Strategic Plan. These are all examined in section 2 along with other relevant national and local policy changes.
- iii. **Changes to Employment Space, Permissions and Mobile Infrastructure:** This section updates on completions of planning permissions in the B class sector since the 2009 ELR. It also looks at changes to permitted development and development in mobile infrastructure.
- iv. **Non B Class Sectors:** Following the 2009 ELR, studies have been undertaken on farming, tourism and retail. Using this evidence, the latest AMR figures and the 2011 census, updates are provided on the main non B class sectors of the Exmoor economy which include farming, tourism, retail and the public sector.
- v. **Conclusions:** The last section of the report provides analysis and conclusions on if and how the evidence has changed since the 2009 ELR and what this may mean for the Draft Publication Local Plan.

## 2. LOCAL CONTEXT

- 2.1 This section provides an updated economic profile of Exmoor National Park using the 2011 census data. In particular, it shows comparisons between 2001 and 2011 and, if and where, there have been any significant changes, which may need to be taken account of in the Draft Publication Local Plan.

## Population

- 2.2 In 2011 the population of Exmoor was 10,273. This represented a 5.5% decrease on the 2001 population of 10,873. This is in contrast to the 2.1% increase which was seen from 1991 to 2001. This decrease may be attributable to a number of factors including the rise in second home ownership: the number of households with no usual residents had increased by 5.5% between 2001 and 2011 to 19.5% - meaning that almost 1 in 5 dwellings on Exmoor are not occupied as a person's main residence. There is also a high percentage of single person households and a significant out-migration of younger people. The SHMA for ENP in West Somerset 2014 states: *'It appears that many of those who are leaving are younger people. This may well be for economic reasons such as employment opportunities or further education.'* Indeed, 39% of the population of Exmoor are aged over 60 and 25% aged 45-59. This is a more ageing population than the average across the English National Parks where 33% are aged over 60 and 23% aged 45-59.<sup>1</sup>
- 2.3 In contrast to the fall in population of Exmoor, the 2011 census showed that the South West and England as a whole both saw a population increase of 7.3%.

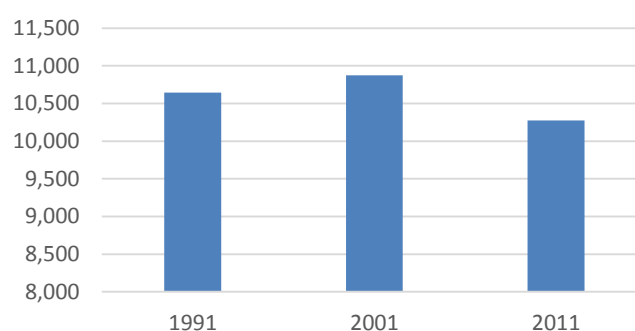
Table 1: Population

	1991	2001	2011	1991-2001 % change	2001-2011 % change
<b>Exmoor National Park</b>	10,645	10,873	10,273	2.1	-5.5
<b>South West</b>	4,611,442	4,928,434	5,288,935	6.9	7.3
<b>England</b>	47,055,205	49,138,831	53,012,456	4.4	7.3

Source: derived from 1991, 2001 and 2011 Census

Chart 1

### Exmoor National Park Population 1991-2011



<sup>1</sup> ONS (2013) Characteristics of National Parks, 2011; and Census 2011 data

## Economic activity

2.4 The findings on economic activity are encouraging for the growth of the Exmoor economy. In 2001 there were 8009 people of working age within Exmoor National Park, of which 63.1% were economically active. In 2011, although the number of people of working age had fallen to 7626, 67% were economically active, equating to 5081 people. The rise in economic activity in Exmoor mirrored that of the South West and England as a whole. Similarly, economic inactivity had fallen by around 3% across the board. This rise in economic activity may be attributable to the in-migration of an increasing ageing population who have been shown to take up part time work or businesses to supplement their pension income.<sup>2</sup>

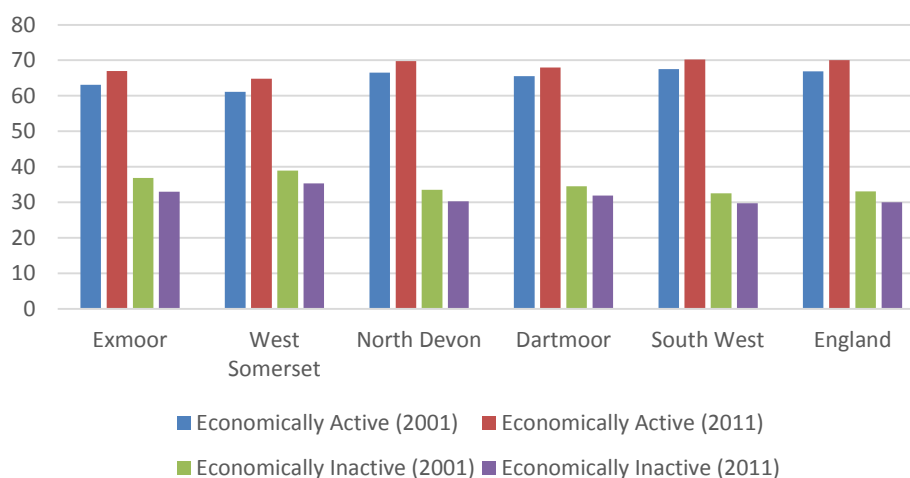
Table 2: Percentage of Economically active people aged 16-74

	Exmoor	West Somerset	North Devon	Dartmoor	South West	England
<b>Economically Active (2001)</b>	63.1	61.1	66.5	65.5	67.5	66.9
<b>All people aged 16-74</b>	8009					
<b>Economically Active (2011)</b>	67	64.8	69.8	68	70.2	70
<b>All people aged 16-74</b>	7626					
<b>Economically Inactive (2001)</b>	36.9	38.9	33.5	34.5	32.5	33.1
<b>Economically Inactive (2011)</b>	33	35.3	30.3	31.9	29.7	30
<b>All people aged 16-74</b>	2545					

Source: derived from 2001 and 2011 census.

Chart 2

### Economic Activity



<sup>2</sup> <http://www.ncl.ac.uk/cre/publish/otherpublications/Prospects%20final.pdf>



## Types of Employees

- 2.5 Table 3 shows little change in the numbers in each type of employment of part time, full time, self-employed, unemployed and full time student. However, there has been a slight rise in part time employees and the self-employed in the Exmoor National Park. This may be attributable to a lack of full time employment opportunities due to the nature of the dominant economic sectors of tourism, farming and retail which tend to offer more seasonal employment opportunities. Or it may be owing to a shift in the types of employment due to lifestyle choices. A report on the future of the rural economy in the UK states: “*Other shifts out of full-time employment for those moving to rural areas include partial retirement, self-employment or setting up a small business*” and “*rural areas have been in the vanguard of the move towards more flexible forms of employment. Flexible forms of employment account in large part for the later exit from the labour market of those living in rural districts, the majority of those working over the age of 60 being either part-time (for women) or self-employed (for men)*”.<sup>3</sup>

**Table 3: Percentage of types of Employees**

	Employees: Part Time	Employees: Full Time	Self- employed	Unemployed	Full Time Student
Exmoor (2001)	11.2	23.1	24.5	2.9	1.5
Exmoor (2011)	13	23.6	26.2	2.2	1.6
South West (2001)	13.2	39.1	10.1	2.6	2.6
South West (2011)	15.1	37.4	11.2	3.3	3.2
England (2001)	11.8	40.8	8.32	3.4	2.6
England (2011)	13.7	38.6	9.8	4.4	3.4

Source: derived from 2001 and 2011 census.

- 2.6 Table 4 overleaf shows data on the different industrial sectors. It should be noted that some of the industrial sectors' categories have changed. Where this is the case, the table shows comparable data.
- 2.7 It is clear from Table 4 that there has been little change in many of the industrial sectors, and that the non B class sectors of agriculture, tourism retail and the public sector still dominate the Exmoor economy.
- 2.8 There has been a slight fall in those employed in agriculture but this still makes up a large proportion of the working population at 11.7%. This is still significantly higher than the regional or national average. Exmoor also contains significantly higher levels of agricultural employment than both West Somerset (5.6%) and North Devon (4.3%), demonstrating the importance of agriculture to the Exmoor economy.
- 2.9 There have been falls in manufacturing and transport, storage and communication in Exmoor, which reflects the picture both regionally and nationally.
- 2.10 The public sector still makes up a significant proportion of local employment, accounting for 21% of the working population, with a rise in those employed in education.

<sup>3</sup> <http://www.ncl.ac.uk/cre/publish/otherpublications/Prospects%20final.pdf>

Table 4 Distribution of Employees by Sector

	Exmoor (2001)	W. Somerset (2001)	N. Devon (2001)	South West (2001)	England (2001)		Exmoor (2011)	W. Somerset (2011)	North Devon (2011)	South West (2011)	England (2011)
<b>Agricultural, hunting and forestry</b>	13.7	7.2	2.5	2.5	1.5	<b>Agriculture, forestry and fishing</b>	11.7	5.6	4.3	1.6	0.8
<b>Fishing</b>	0.17	0.12	0.08	0.08	0.02						
<b>Mining and quarrying</b>	0.06	0.1	0.3	0.3	0.25	<b>Mining and quarrying</b>	0.1	0.1	0.1	0.2	0.2
<b>Manufacturing</b>	7.6	9.9	13.9	13.9	14.8	<b>Manufacturing</b>	5.2	6.3	10.9	9.1	8.8
<b>Electricity, gas and water supply</b>	0.3	1.1	0.8	0.8	0.7	<b>Electricity, gas, steam and air conditioning supply</b>	0.5	1.1	0.4	0.6	0.6
						<b>Water supply; sewerage, waste management and remediation activities</b>	0.5	0.8	0.7	0.8	0.7
<b>Construction</b>	7.3	7.4	7.2	7.2	6.8	<b>Construction</b>	7.6	7.5	8.5	8.0	7.7
<b>Wholesale and retail trade, motor repairs</b>	14.3	16.4	17.1	17.1	16.9	<b>Wholesale and retail trade; repair of motor vehicles and motor cycles</b>	14.2	15.3	17.1	16.2	15.9
<b>Hotels and catering</b>	15.0	13.5	5.6	5.6	4.7	<b>Accommodation and food service activities</b>	15.6	14.5	9.8	6.3	5.6
<b>Transport, storage and communication</b>	4.0	4.3	4.4	6.2	7.1	<b>Transport and storage</b>	2.4	3.0	2.9	4.0	5.0
						<b>Information and communication</b>	2.0	1.7	1.4	3.3	4.1
<b>Financial intermediation</b>	1.6	1.6	1.5	4.3	4.8	<b>Financial and insurance activities</b>	1.7	1.5	1.4	3.7	4.4
<b>Real estate, renting and business activities</b>	9.35	8.7	8.6	11.4	13.2	<b>Real estate activities</b>	1.5	1.6	1.3	1.4	1.5
						<b>Professional, scientific and technical activities</b>	4.8	4.3	4.3	5.9	6.7
						<b>Administrative and support service activities</b>	4.4	4.7	4.4	4.4	4.9
<b>Public administration and defence</b>	3.7	3.89	5.14	7.04	5.66	<b>Public administration and defence; compulsory social security</b>	3.2	4.1	5.6	7.1	5.9
<b>Education</b>	5.84	6.9	6.7	7.6	7.7	<b>Education</b>	8.1	8.9	9.0	9.7	9.9
<b>Health and social work</b>	10.6	12.3	12.0	11.0	10.7	<b>Human health and social work activities</b>	9.7	13.0	13.1	12.9	12.4
<b>Other</b>	6.6	6.7	4.3	4.9	5.2	<b>Other</b>	6.9	6.2	4.7	4.8	5.0

Source: derived from 2001 and 2011 Census.

## Qualifications

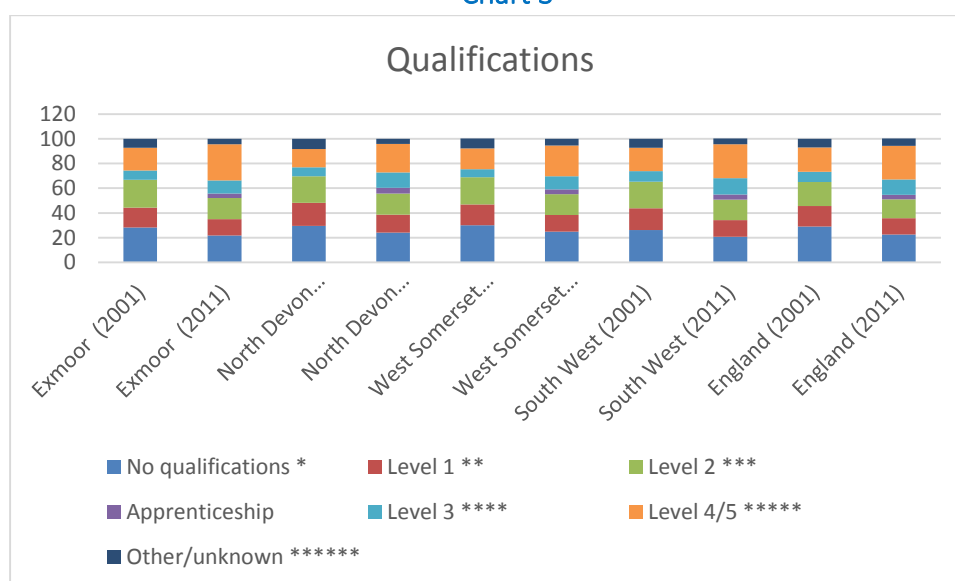
2.11 Table 5 and Chart 3 show some interesting findings suggesting that Exmoor holds a more highly qualified workforce than has previously been. Locally, regionally and nationally, there appears to be a fall in those with no qualifications or level 2 or 3 qualifications but a significant rise in those holding level 3 or level 4/5 qualifications. The rise is more significant in those holding level 4/5 qualifications with rises of around 8% in both West Somerset and North Devon and more than 10% in Exmoor.

Table 5: Qualifications

	Exmoor (2001)	Exmoor (2011)	North Devon (2001)	North Devon (2011)	West Somerset (2001)	West Somerset (2011)	South West (2001)	South West (2011)	England (2001)	England (2011)
<b>No qualifications *</b>	28.3	21.8	29.5	24.1	30.1	24.8	26.2	20.7	28.9	22.5
<b>Level 1 **</b>	16	13.2	18.7	14.4	16.8	13.6	17.7	13.6	16.6	13.3
<b>Level 2 ***</b>	22.4	17.1	21.6	17.2	21.9	16.7	21.4	16.4	19.4	15.2
<b>Apprenticeship</b>		3.6		4.7		4.0		4.3		3.6
<b>Level 3 ****</b>	7.7	10.7	7.1	12.4	6.7	10.7	8.6	13.2	8.3	12.4
<b>Level 4/5 *****</b>	18.3	29.1	14.7	22.9	16.7	24.8	18.8	27.4	19.9	27.4
<b>Other/unknown *****</b>	7.3	4.4	8.4	4.3	7.9	5.3	7.2	4.5	6.9	5.7

Source: derived from 2001 and 2011 Census.

Chart 3

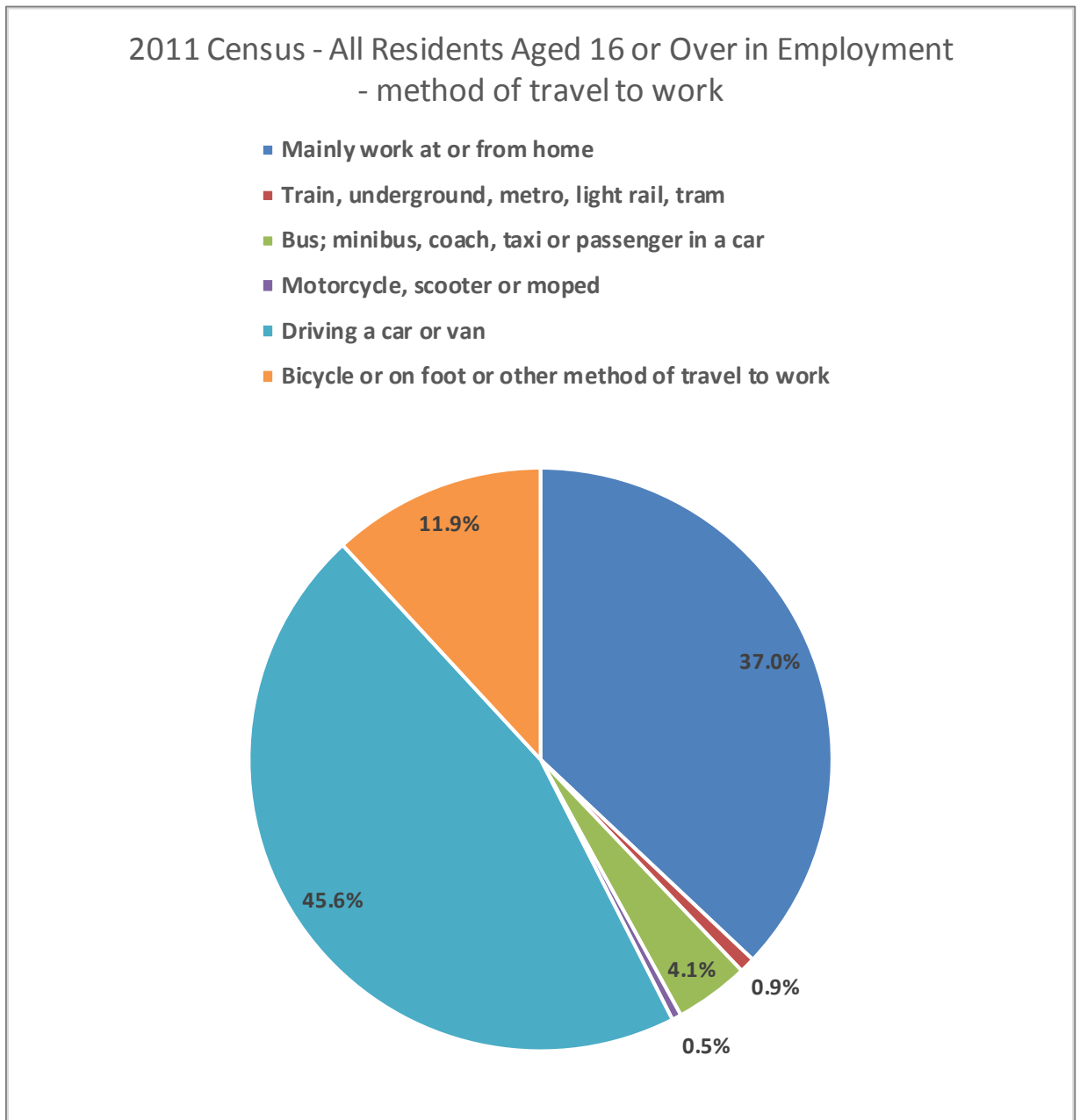


Source: derived from 2001 and 2011 Census.

## Commuting Patterns

2.12 It is clear from Chart 4 that driving a car or van is the main form of travel to work – reflective of a sparse rural area with small settlements and limited public transport opportunities. These factors also result in a high proportion of people who work at/from home (37%) – a considerable proportion when compared to other areas. The increase in home working overall from the 2001 census is 5.65% - the changes for local authorities in England and Wales can be seen in Figure 1. The increase in homeworking may well be attributable in the increasing provision of broadband and mobile networks. Please see section 4 for further details.

Chart 4: Method of travel to work



Percentage of people in employment working at or from home (2011):

Exmoor National Park	37.0%
England	10.3%
South West	12.7%
North Devon	16.9%
West Somerset	25.3%

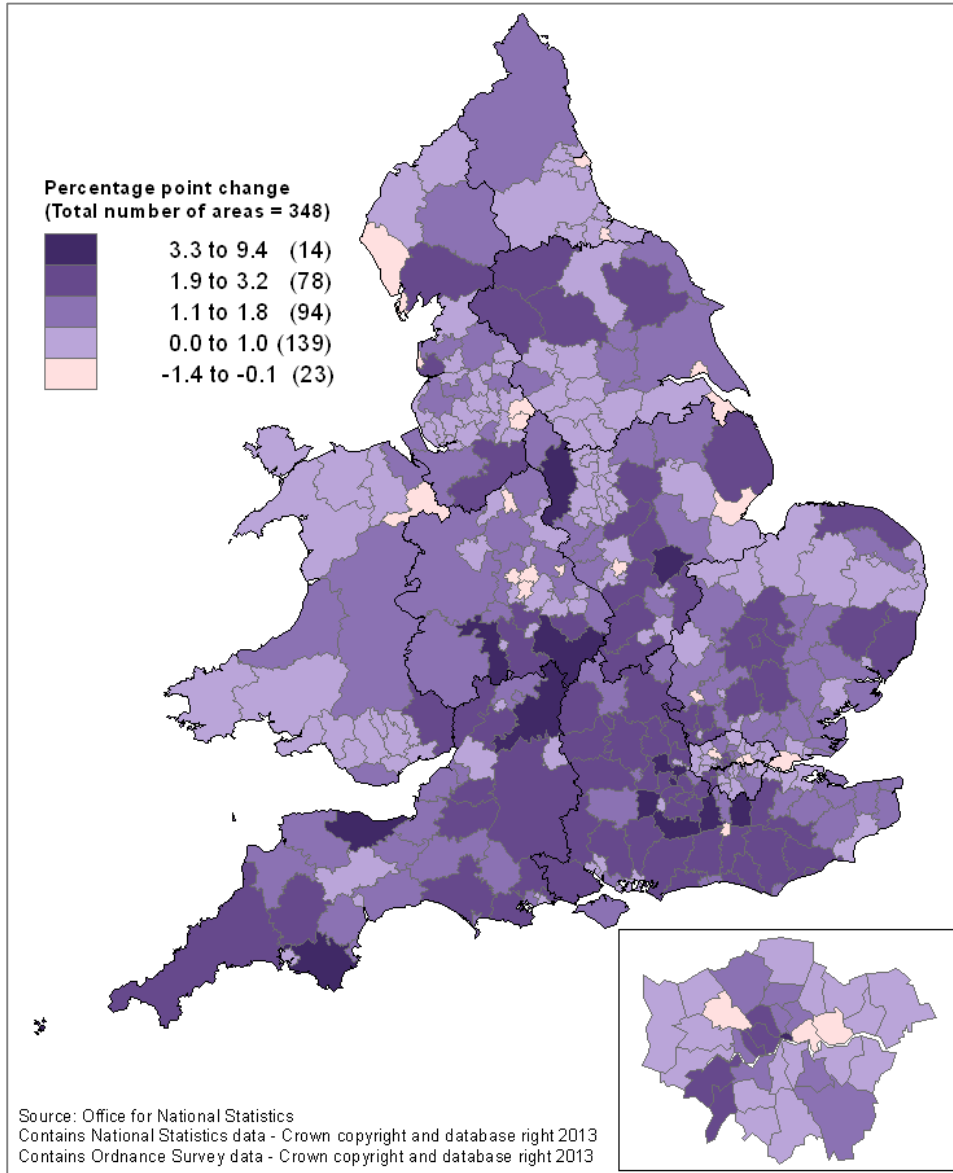


Figure 1 – ONS data relating to change in home working

### Where people work

- 2.13 Chart 3 shows those living in the National Park and working in the South West (4864 people in total). A large proportion of people work at or from home and travel less than 10km to work – therefore the largest proportion of people work in North Devon and West Somerset (includes Exmoor National Park).
- 2.14 The chart also shows the LAs that are also popular destinations to work including Taunton Deane, Sedgemoor and Mid Devon. Around 3% of people working in the South West region work in other LAs including Exeter and Bristol City where 33 and 14 people travel to work respectively.

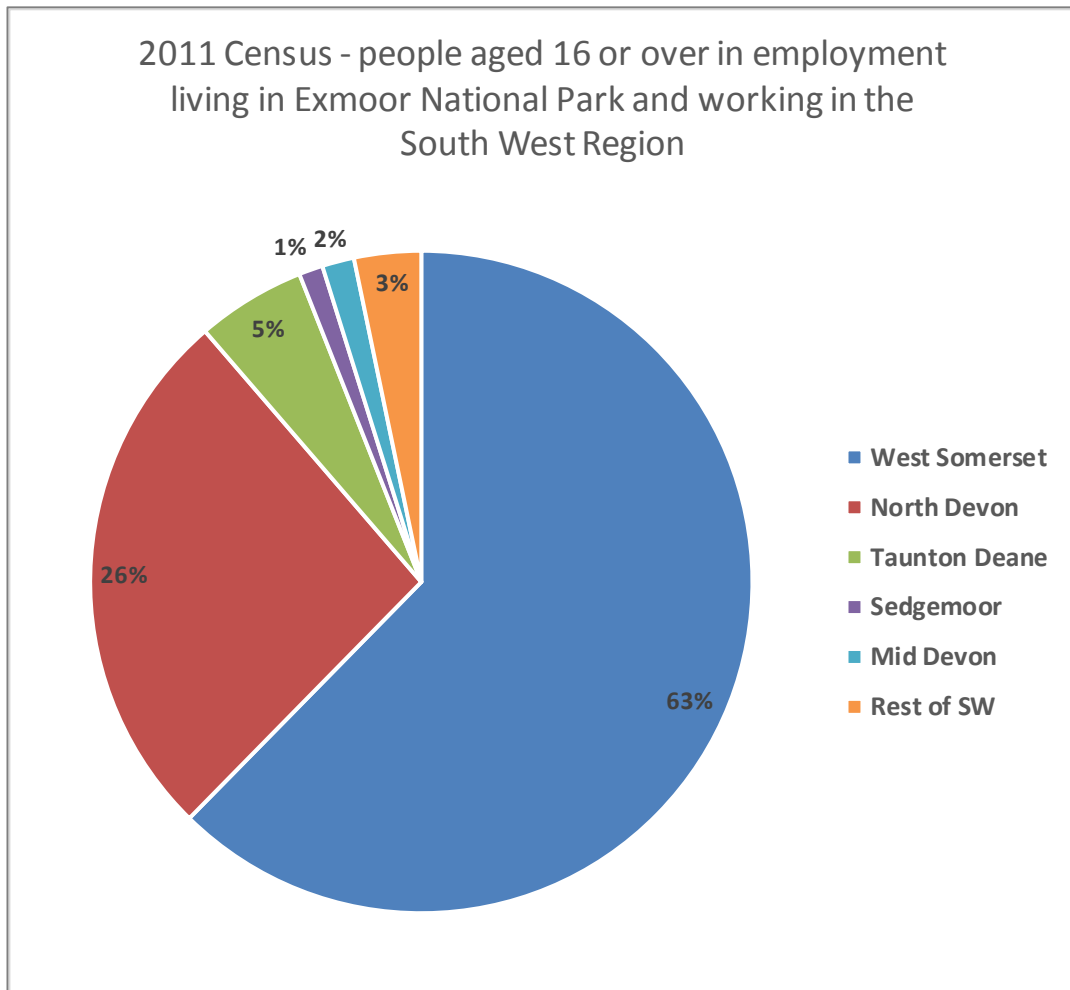


Chart 5

- 2.15 For the remaining people who live in Exmoor National Park but work outside the South West region (115 people) the most popular destinations are the London Boroughs that make up the Greater London area, or the South East region as shown by Chart 6 below:

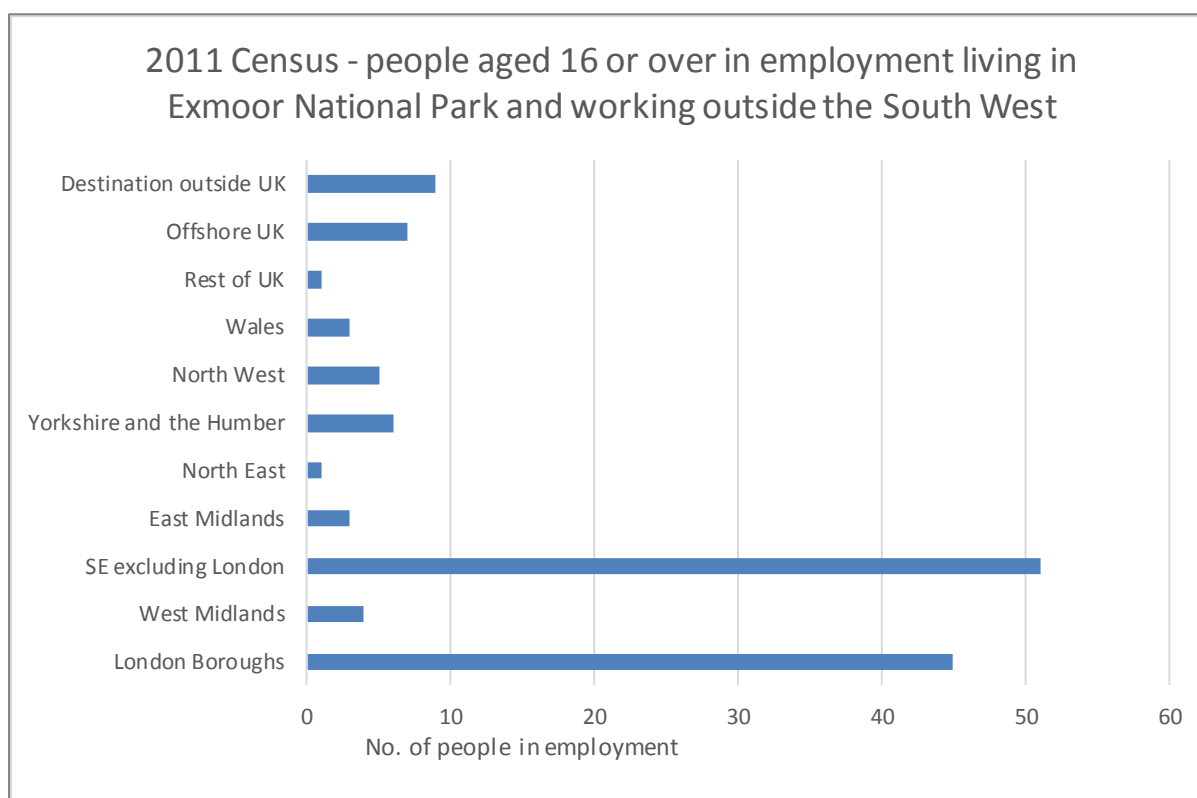


Chart 6

## Conclusions

- 2.16 The findings of this section are encouraging showing that Exmoor is a relatively stable, self-contained economy with encouraging prospects for growth of an economy of its size and nature. Although there has been a fall in the population, there has been a rise in economic activity and those holding level 4/5 qualifications. There are also more people who are choosing to work from home and nearly 90% of those who live in the National Park work in either North Devon or West Somerset. The distribution of those in different industrial sectors has remained relatively constant, with those in the agricultural, tourism, retail and public sector again making up large parts of the Exmoor economy. This means that a large proportion of employment is seasonal and can provide difficulties for those seeking full time employment. However, the growth of broadband and other mobile infrastructure should continue to provide more opportunities for home based working and entrepreneurship as it widens opportunities for business in remote rural areas and opportunities for non-locational specific jobs.
- 2.17 Policies in the Plan support the developments of the economy that have been highlighted. Specifically Policy SE-D1 has provided more flexibility to allow people to work from home through the use of part of a residential property, a small scale extension, the use of ancillary buildings where they are well related to existing buildings or, where no suitable buildings exist new outbuildings within the domestic curtilage for a small scale home based business, subject to the criteria of the policy and the policies of the Plan as a whole. Perhaps more importantly, Policy AC-S4, electricity and communications networks and AC-D5 radio and mobile

telecommunications infrastructure have allowed the development of projects which are significantly improving access to broadband and telecommunications networks, allowing people to work from home, set up businesses and expand existing businesses in remote rural locations (see section 3 for further details).

### 3. POLICY CONTEXT

#### Planning Policy Context

- 3.1 It is important that planning policies in the Exmoor Local Plan are based on up to date guidance and legislation. Since the ELR was published in 2009, there has been two changes of Government which has led to significant changes in planning guidance and legislation. This Update provides a summary of the more recent government guidance upon which the policies in the Exmoor Local Plan will be based.

#### National Planning Policy Framework

- 3.2 The 2009 ELR based its policy context on the relevant Planning Policy Statements that were in place at the time of writing. The National Planning Policy Framework (NPPF) was introduced in 2012, and put all the planning guidance into one document. This has since been supplemented with online planning practice guidance.<sup>4</sup>
- 3.3 The NPPF provides that the purpose of the planning system is to contribute to the achievement of sustainable development, of which there are three dimensions: economic, social and environmental. At the heart of the NPPF is a 'presumption in favour of sustainable development', which is seen as a golden thread running through both plan and decision making.
- 3.4 The Government is committed to securing economic growth in order to create jobs and prosperity and to ensuring the planning system does everything it can to support sustainable economic growth. To help achieve economic growth, the NPPF provides that local planning authorities should plan proactively to meet the development needs of businesses and be flexible to accommodate unforeseen needs and changes in economic circumstances.
- 3.5 Planning Authority areas are required to provide a clear economic vision and strategy which positively and proactively encourages sustainable economic development. The NPPF provides that criteria should be set, or sites should be identified to meet the needs of the local economy and flexible working practices should be facilitated. 'Planning should take account of market signals... and set out a clear strategy for allocating sufficient land which is suitable for development... taking account of the needs of the residential and business communities'.<sup>5</sup>

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<sup>4</sup> <http://planningguidance.communities.gov.uk/>

<sup>5</sup> CLG (2012) National Planning Policy Framework. Para 17



- 3.6 More specifically, the NPPF provides for supporting a 'prosperous rural economy' and in doing so, local and neighbourhood plans should:
- support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well-designed new buildings;
  - promote the development and diversification of agricultural and other rural businesses; support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres; and
  - promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.

### Analysis

- 3.7 Although the NPPF has condensed and superseded the guidance that was set out in Planning Policy Guidance previously, the principles of encouraging sustainable economic development remain.
- 3.8 The policies as set out in the publication version of the Exmoor National Park Local Plan are in accordance with the NPPF. In setting out an economic vision and strategy, objective 14 of the Plan looks to achieve a '*strong, diverse, resilient and self-sufficient economy and encourage economic and employment opportunities which do not conflict with National Park purposes*'. The policies of the Plan seek to encourage development which will help strengthen and diversify the Exmoor economy (Policy SE-S1) and safeguard existing employment premises (Policy SE-D2), whilst sustaining the high quality environment of Exmoor National Park. A range of business opportunities are encouraged through the reuse of previously developed (or brownfield) land and by providing for new sites and buildings (Policy SE-S2) within the named settlements identified in GP3. There are also opportunities for economic development outside settlements on farmsteads and in hamlets (Policy SE-S3), and for home based working (Policy SE-D1 Home Based Businesses). The retention and development of local and community services and facilities are also promoted in Policy HC-S6, Local Commercial Services and Community Facilities.

### Planning Practice Guidance

- 3.9 Planning Practice Guidance provides that Employment Land Reviews (ELRs) should consider both the quantity of employment space needed, as well as understanding the qualitative requirements of different market segments. The assessment should be based on factual evidence and not apply constraints to the assessment of need. It should also include an assessment of main town centre

uses and this has been assessed through a Quantitative Needs Assessment undertaken in 2011 and is considered under the retail section in section 5.

- 3.10 The assessment needs to consider recent employment land supply (and losses to other uses), market intelligence, market signals such as rents, land values and take up including any infrastructure constraints. Where distinct markets are evident, it encourages these to be considered.
- 3.11 In considering future demand, an assessment is required of quantitative and qualitative need taking account of forecasts of labour demand and supply, past take up and dialogue with relevant stakeholders. It encourages analysis of the requirements of different market segments.
- 3.12 This update along with the 2009 ELR provides an up to date analysis of the quantitative and qualitative needs for employment land in Exmoor National Park, looking at different market segments, in particular those that are predominant in the National Park. Paragraphs 1.3-1.9 in the introduction outline where updates are provided in this report to ensure the assessment is relevant to current policy and to the economy of Exmoor.

### National Parks Circular

- 3.13 The National Parks Circular was published in 2010, and provides a Government Vision for National Parks in England. Specifically, the Circular, reconfirms that the Government continues to regard National Park designation (together with that of Areas of Outstanding Natural Beauty (AONBs)) as conferring the highest status of protection as far as landscape and natural beauty is concerned.<sup>6</sup>
- 3.14 The Circular emphasises that National Parks are living working landscapes, where Authorities can play a catalytic role through fostering an appropriate planning regime encouraging new development to broaden the economic base and foster more diverse and higher value local employment opportunities. However, the Circular notes the low levels of productivity and low wages of many of the National Parks, and therefore emphasises the importance of developing strategies that are fully informed by their local economic circumstances and that planning and economic development strategies foster improvement in productivity and incomes through appropriate policy and intervention.<sup>7</sup>

### LEP Strategic Plan

- 3.15 Following the Government's Local Growth White Paper 2010, Local Enterprise Partnerships (LEPs) were created, as strategic partnerships between businesses, local authorities, universities and further education. The Heart of the South West LEP spans across Somerset, Devon, Plymouth and Torbay and its purpose is to lead and influence economic growth, job creation and prosperity.
- 3.16 In 2014, the Heart of the South West LEP produced its Strategic Economic Plan 2014-2030. The Plan sets out a vision for growth where the heart of the South

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<sup>6</sup> National Parks Circular 2010 paragraph 20

<sup>7</sup> National Parks Circular 2010 paragraph 69

West will be known for *'its diverse economy, fuelled by knowledge, talented people, dynamic businesses and an outstanding natural environment.'*<sup>8</sup>

The Plan sets out three core aims:

- i. creating the conditions for growth: improving infrastructure and services to underpin growth;
- ii. maximising productivity and employment: stimulating jobs and growth across the whole economy; and
- iii. capitalising on our distinctive assets: utilising our distinctive assets to create opportunities for business growth and better jobs.

and two cross cutting principles:

- i. Environmental sustainability: achieving growth whilst protecting and enhancing our environment
- ii. Inclusion: Where opportunity to participate is available to all and everyone benefits from our collective successes.

3.17 The Plan provides an analysis of the economy of the LEP area. Over 90% of the LEP landmass is classified as rural and is characterised by a dispersed population and a high number of SMEs. However, over 40% of the population live in urban areas. The area is underperforming compared to the national average across a number of measures of productivity and business competitiveness. This economic under-performance reflects a number of key barriers to growth such as transport and digital connectivity, skills, and support for businesses. The Plan notes that in rural areas, a lack of transport to access employment and training can present a significant barrier to social inclusion, particularly for young people, the elderly and those without access to a car. A survey by Job Centre Plus customers in West Somerset showed that 52% found limited or lack of public transport a barrier to accessing work.<sup>9</sup> One of the LEP's key messages is that the weak transport infrastructure in the South West is inhibiting growth and productivity and damaging the economy. However, the Plan encourages opportunities for digital infrastructure which can help to improve the resilience and productivity of the economy.

3.18 The Plan recognises the importance of the natural environment not just for providing beautiful landscapes and wildlife but to the LEP area as a key economic asset. Out of the beauty of the natural environment has risen the bedrock sectors of the South West such as agriculture and fishing, tourism and food and drink, as well as the wider regulatory services (such as flood control), therefore growth needs to be responsible and opportunities are encouraged for green growth.

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<sup>8</sup> Heart of the South West Local Enterprise Partnership: Strategic Economic Plan 2014-2030. Pg. 14

<sup>9</sup> Access to Transport Survey. July 2013 Minehead JobCentre Plus in partnership with West Somerset Council.

## Analysis

- 3.19 The Publication Draft Exmoor National Park Local Plan supports the vision, aims and principles of the Heart of the South West's Strategic Economic Plan. It aims to encourage economic development that conserves and enhances the National Park (Policy GP1), and its bedrock industries of agriculture (SE-S4), tourism (RT-S1) and the public sector as well as encouraging entrepreneurship through allowing SMEs to set up and develop through conversions and changes of use where appropriate (SE-S2 and SE-S3).

## Exmoor and Dartmoor Economic Prospectus

- 3.20 Exmoor and Dartmoor National Parks have produced a joint economic prospectus which sets out four key areas to help develop opportunities for growth. These priorities are supported by policies in the Publication Draft Local Plan:
- 3.20.1 Improve connectivity: through the Connecting Devon and Somerset programme of rolling out superfast broadband; and through improving mobile coverage, and rail and road infrastructure. (Supported by Policy AC-S4 Electricity and Communications Networks and AC-D5 on radio and telecommunications infrastructure which both look to improve the communications infrastructure)
- 3.20.2 Promoting Place and Product: recognising the value of the National Park and local supply chains. (Policy SE-S1 looks to strengthen, enhance and diversify the economy through encouraging business and employment development.)
- 3.20.3 Support for the key sectors of farming, food and tourism. (Policy SE-S4, Agricultural and Forestry Development and RT-S1 Recreation and Tourism, and HC-S6 Local Commercial and Community Facilities look to support the key sectors of farming, food and tourism.)
- 3.20.4 Sustain the resource i.e. the National Park resource – the environment, access to it and its promotion. (Policy GP1 looks to sustain the National Park resource.)

## National Park Partnership Plan 2012-2017

- 3.21 The Exmoor National Park Partnership Plan sets out what is special about Exmoor and the long term vision, objectives and priorities to be achieved on Exmoor during the period to 2017. It is seen as the key mechanism for focusing and co-ordinating efforts to achieve the purposes for which the National Park was designated.
- 3.22 The Management Plan for Exmoor National Park for 2007-2012 set out a vision for the National Park and its communities. This vision has been retained and developed in the preparation of the current Partnership Plan and is shared with the vision as set out in the Draft Publication Local Plan. In turn the Partnership Plan 2012-17 shares its objectives with the Publication Draft Local Plan. Both the vision and objectives will be carried forward to the next version of the Partnership Plan to ensure the documents are aligned. The single vision and common objectives will ensure that the policies and decisions regarding future development and the Partnership Plan actions work together in one direction.

3.23 The relevant shared objectives include the following:

- **Objective 13:** To improve the sustainability, resilience and self-sufficiency of the National Park's settlements by supporting the retention, provision of, and access to community services and facilities.
- **Objective 14:** To achieve a strong, diverse, resilient and self-sufficient economy and encourage economic and employment opportunities which do not conflict with National Park purposes.
- **Objective 15:** To achieve profitable farming, forestry and land management in ways that conserve and enhance the special qualities of the National Park whilst producing food and other produce, and conserving distinctive local breeds.
- **Objective 16:** To support the tourism industry in providing a warm welcome and a range of sustainable accommodation, services and facilities, leading to a high quality Exmoor experience for visitors and local communities alike.

### Conclusion

3.24 The conclusions of the 2009 ELR are still relevant, namely that, at the strategic planning level, the emphasis is on creating sustainable economic development, and that within the National Park, this means continuing with the Draft Publication Local Plan approach of promoting sustainable economic development that takes account of the character of the local economy and the nature of the area, and ensuring that the demand for employment land is satisfied through providing for small scale development in appropriate locations whilst also restricting the loss of existing space.

## 4. CHANGES TO EMPLOYMENT SPACE, PERMISSIONS AND MOBILE INFRASTRUCTURE

4.1 This section examines the planning permissions that have been completed on since the 2009 ELR, to assess whether there has been any significant increase or loss of employment land in the Exmoor National Park. It also looks at changes in legislation on permitted development and initiatives to improve mobile infrastructure.

### Changes to Employment Space

4.2 Table 6 overleaf shows that there has been a steady increase in the amount of B class employment space in the National Park, through a small number of important applications. The majority of this increase in employment space was as a result of three large developments:

- **Cutcombe Market:** The Cutcombe Livestock Market site has been redeveloped to comprise of a new livestock market, space for workshops and both market and affordable housing. The livestock facility was completed and formally opened during August 2010. The development also comprised of business units to offer flexible working space for a variety of businesses and the permanent change of use of other on site buildings from agricultural use to

manufacturing (B2) where formerly only temporary permission had been granted.

- **Singer Instruments:** Singer Instruments, a family business based in Roadwater, who design and manufacture laboratory robotics for biotechnology, undertook significant expansion of their high technology business in Roadwater to provide 317sq metres of additional B1 space.
- **Shearwell Data Ltd:** Shearwell Data Ltd, a business that specialises in animal identification, both electronic and visual; within Cutcombe Parish, undertook re-development of their employment site to replace an existing agricultural building and workshop lean-to with a purpose built B1 office. A significant space for research and development and light industry workspace (2,153m<sup>2</sup> gross external area) was also provided along with 40kw of roof mounted solar photo voltaic array, a change of use and extension of existing agricultural storage building to B1 light industry (371m<sup>2</sup> gross external area), and extension of the car park, landscaping and a new access drive. (2013/14 AMR)

- 4.3 The amount of B class employment land development outside of these three large developments illustrated above, is insignificant in floorspace terms, as is, the loss of employment space. This demonstrates that the policies that protect our existing employment land are still valid and that the development that has taken place illustrates that the Local Plan policies are supporting the growth of existing businesses.
- 4.4 However, the 2009 ELR provided a number of scenarios to forecast the growth in B1, B2 and B8 uses. The highest forecast for B1 uses was a requirement for an additional 250sq metres of B1 space to 2026. However, the result of the three larger developments as noted in 4.2 above means that the overall development of B1 floorspace has already significantly exceeded the forecast figure of 250sq metres of B1 floorspace. To date there has been a net growth of 3280sq metres. However, without the three larger developments the net growth would be 62.5 sq. metres which is in line with the forecasted growth of the ELR.
- 4.5 The growth in B8 is also significant, partly as a result of the Cutcombe Market development. The highest forecast for B8 uses was a requirement for 650sq metres. 500 square metres of that has already been built out, 280sq metres resulting from the Cutcombe Market development.
- 4.6 The growth resulting from these three large developments should not cause any alarm or signify a need for further forecasting of growth in B uses. Rather, these developments show that policies within the adopted Local Plan have allowed for the expansion of existing businesses within their premises. Although the Publication Draft Local Plan was not used to determine these significant business applications, its policies are consistent with those of the adopted Local Plan that permitted these developments.

Employment Land Review Update 2016

Table 6: Planning Permissions for B class uses

Use Class)	2008/9	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	Total (sq.m)			
<b>B1</b>	84 office		287 (B1b)	242	Cutcombe market	32	Designer textile unit	49.5	Light industrial		
	-58		31.6 (B1a)			2153	Office and light industrial (Shearwell)				
			-34 (B1a)		Loss of employment space	371	Light industrial (Shearwell)				
						132.99	Office and archive (Shearwell)				
						-11	Commercial units				
<b>Total B1</b>	<b>26</b>	<b>0</b>	<b>284.6</b>	<b>242</b>		<b>0</b>	<b>2677.9</b>	<b>49.5</b>	<b>3280</b>		
<b>B2</b>	-260			250	Cutcombe market manufacturing	-230	Redundant workshops to domestic outbuildings	33	Workshop/store	27	General industrial
				110	Re-use of existing buildings To create live/work unit with workshop			-65.3	General industry		
<b>Total B2</b>	<b>-260</b>			<b>360</b>		<b>-230 (CLU)</b>	<b>-32.3</b>				<b>-162.3</b>
<b>B8</b>		220	Storage building		280	Cutcombe market					<b>500</b>
<b>Sui generis</b>			649	Cutcombe Livestock market		350	Builders yard & parking				<b>999</b>



## Mobile Infrastructure Project and Rural Broadband Delivery

- 4.7 Since the 2009 ELR, there have been a number of initiatives to improve mobile infrastructure and broadband delivery, which have benefited residents, businesses and visitors to the National Park, having a positive effect on the economy. Indeed, access to broadband and mobile infrastructure provides opportunities for the self-employed, those wanting to set up business in the National Park and home based employment.
- 4.8 In October 2011, the Department for Culture, Media & Sport announced £150m in capital expenditure to improve mobile telephone coverage and quality through its Mobile Infrastructure Project. The project recognised that some rural areas of the UK did not get good quality mobile coverage and included 'not spots' with no coverage from any of the Mobile Network Operators, and where the market would not invest.
- 4.9 Exmoor National Park Authority has worked closely with the Mobile Infrastructure Project on potential opportunities to improve mobile coverage for those communities without mobile signal, while aiming to ensure that the natural beauty of Exmoor's landscape was conserved. This work included the development of a shared 4G telecommunications mast at High Golsoncott Farm, Roadwater, for which planning permission was granted in September 2014.
- 4.10 The Authority has continued to work with the Mobile Infrastructure Project on other potential sites for telecommunications infrastructure. However, progress on each site is dependent on the resolution of technical issues and of suitable transmission solutions being available in the context of the National Park landscape setting.
- 4.11 The Government is also seeking to improve the UK's broadband network through the Broadband Delivery UK (BDUK) programme and initially set aside £530 million of public funding to help BDUK reach 90% of premises by 2016. Locally, the scheme is being delivered by the Connecting Devon and Somerset Programme (CDS), a public-private partnership of six local authorities (Somerset, Devon, North Somerset, Torbay, Plymouth and Bath and North East Somerset) and private delivery partner BT. Dartmoor and Exmoor National Park Authorities have also been working in partnership with CDS to secure additional funding through the Rural Community Broadband Fund (RCBF) to extend the initial reach within the two National Parks. The first phase of the CDS programme and the RCBF is expected to increase superfast broadband availability to homes and businesses in Devon & Somerset to around 69%.
- 4.12 In February 2014, the Government announced additional funding for delivery of superfast broadband in some of the UK's hardest to reach rural areas (the Superfast Extension Programme), with the aim of ensuring that 95% of UK homes and businesses have access to broadband by 2017. Following application by Devon and Somerset County Councils, the CDS programme has benefited from a further £22.75m from the Superfast Extension Programme to roll out a second phase of the programme, which will aim to extend superfast broadband



to around 95% of homes and businesses within the National Park, using fixed wireless technology.

## Changes to the Planning System

- 4.13 There have been significant changes to the Planning System since the 2009 ELR. Policy changes are shown under section 3. However, in addition, there have been legislative changes that have impacted on development management and permitted development.

## Alterations to the General Permitted Development Order

- 4.14 Permitted development rights allowing a change of use from offices to residential were introduced from May 2013. It was announced in October 2015, that these rights would be extended permanently<sup>10</sup>. The permitted development right is subject to prior approval to consider the impact of the proposed development in relation to highways and transport, flooding and contamination. Since the introduction of the temporary permitted development rights, one office has been lost to residential use within the National Park.
- 4.15 Other changes made to the General Permitted Development Order which are most relevant to the National Park Authority include:
- 4.15.1 Shops can change to banks, building societies, credit unions or friendly societies, a restaurant or café or an assembly or leisure facility. This has potential to have significant impact in rural communities where the only remaining shop may change to the provision of financial services.
- Shops have a temporary permitted development right (2 years) to change to a B1 business use (interchangeable with notification).
  - Similarly pubs, restaurants and cafes can change to shops or a financial institution such as banks, building societies, credit unions or friendly societies. Again, this has the potential to impact on rural communities which have one pub in a settlement.
  - There is a temporary permitted change of use (2 years) to allow B1 Business to change to shops, banks, building societies, credit unions or friendly societies, or a restaurant or café.
  - Shops and premises offering financial and professional services to visiting members of the public can change use to a dwelling house. While the new right does not apply in National Parks, there may be a potential impact on National Park communities with the loss of services in settlements close to National Park boundaries. The prior approval of the local planning authority will be required on various matters to ensure that the change of use and any associated works do not create unacceptable impacts.
  - Subject to a number of conditions and restrictions, agricultural buildings and land in their curtilage may convert to a “flexible use” under Class R.

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<sup>10</sup> <https://www.walkermorris.co.uk/business-insights/office-residential-permitted-development-rights-made-permanent>

Flexible use means any use falling within Class A1 (shops), Class A2 (financial and professional services), Class A3 (restaurants and cafes), Class B1 (business), Class B8 (storage or distribution), Class C1 (hotels) or Class D2 (assembly and leisure). This may have a positive impact, by allowing agricultural businesses to diversify further.

- Agricultural buildings can change to a registered nursery providing childcare or a state-funded school to increase school and childcare places and support rural communities.

## 5. THE IMPORTANCE OF NON-B CLASS SECTORS IN THE EXMOOR ECONOMY

### Introduction

- 5.1 An important characteristic of the Exmoor economy is its reliance upon non-B Class sectors. The 2009 ELR provided a review of non-B class sectors in the Exmoor economy and this Update provides more recent evidence on those sectors which include agriculture, public sector services, retail and tourism.

### Agriculture

- 5.2 Farming remains a dominant land use on Exmoor and continues to play an important role in helping to manage and enhance the quality of the landscape and the environment. In 2001 agriculture, forestry, fishing and hunting made up 13.87% of the local economy. In 2011 this figure had fallen to 11.7%\*. The decline in these industries is reflected both regionally and nationally: In the South West agriculture, forestry, fishing and hunting fell from 2.58% in 2001 to 1.6% in 2011 and in England from 1.52% in 2001 to 0.8% in 2011\*.

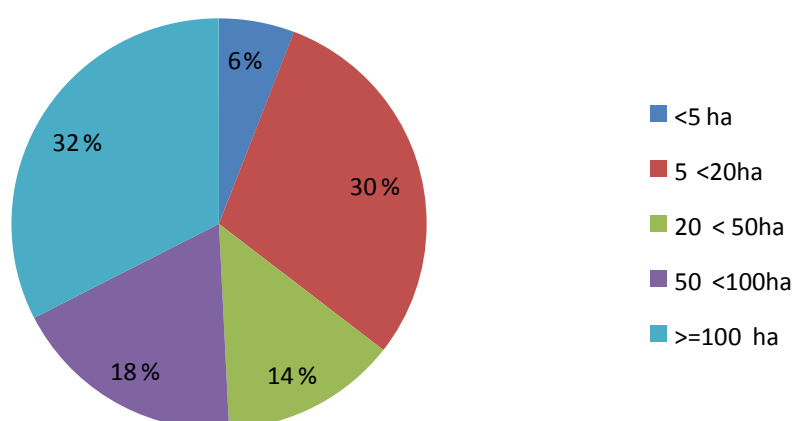
Chart 7: Percentage of those employed in Agriculture, Forestry, Fishing and Hunting.



\*Caution should be used in looking at the census data with regard to these industries, as the 2001 data included hunting and the 2011 data did not.

- 5.3 Employment levels in farming continue to be low. The Defra June Survey data<sup>11</sup> indicates that an average Exmoor commercial farm is managed by 1.5 people and that the farm labour force is dominated by self-employed farmers and family members with fewer than 20% working as employees.
- 5.4 The farming pattern on Exmoor is typical of English uplands as a whole, where sheep production dominates. Permanent pasture is the main land use, although cropped areas and rough grazing are also significant. Beef herd numbers have declined consistently since 2005, while sheep numbers initially declined but have seen modest growth since 2010.<sup>12</sup>
- 5.5 Farm holdings tend to be large and there is a continuing trend to larger commercial holdings, with numbers in all smaller size bands declining (see chart 8 below). Chart 9 shows that between 2010 and 2013 a trend to larger commercial holdings has continued, with numbers in all smaller size bands declining, and a 10% growth in those over 100ha.

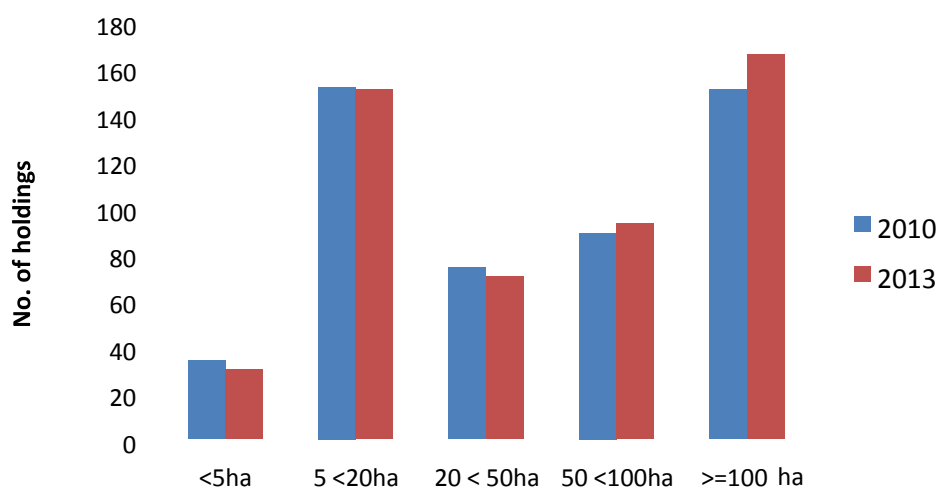
Chart 8: Exmoor commercial holdings by size (% distribution)



<sup>11</sup> Countryside and Community Research Institute: The State of Farming in Exmoor 2015. Pg. 6.

<sup>12</sup> Countryside and Community Research Institute: The State of Farming in Exmoor 2015. Pg. 6.

Chart 9: Exmoor commercial holdings by size group in 2010 and 2013



Source: Defra June Survey

- 5.6 Diversification continues to form part of the farm income, currently contributing over 16% of income on average.<sup>13</sup> Key types of diversification are tourist accommodation, contracting, off farm work, and increasingly renewable energy. The State of Farming in Exmoor report, 2015, suggests that the importance of diversification will continue to increase. Indeed, although the average age of farmers is 59 years old<sup>14</sup>, survey data<sup>15</sup> shows that younger farmers tend to have larger farms and are more open to both business growth and diversification than farmers who are near or past retirement age, indicating that trends in larger farms and diversification will continue.
- 5.7 The ELR 2009 study interviewed a number of farmers who identified issues to expansion which included income constraints, disease, environmental constraints, bureaucracy and planning restrictions. The 2015 State of Farming in Exmoor similarly undertook a survey of which 117 farmers partook. In the next five years, 65% expect to still be farming while 21% intend to retire and only 4% indicated they did not know what would happen. Concerns about the future varied between the respondents. However, market prices, family/transfer and policy issues all were common concerns. Other common concerns included:
- Low incomes, profitability and input costs,
  - Variability of prices for finished livestock – more consistency is required to enable planning
  - Bovine TB
  - Record keeping and the level of paperwork
  - High price of rented land
  - Ageing farm population and lack of opportunity for young farmers to get started
  - Managing sensitive areas with reduced grants

<sup>13</sup> Ibid pg. 7

<sup>14</sup> DEFRA: Agriculture in the United Kingdom data sets: Table 2.6

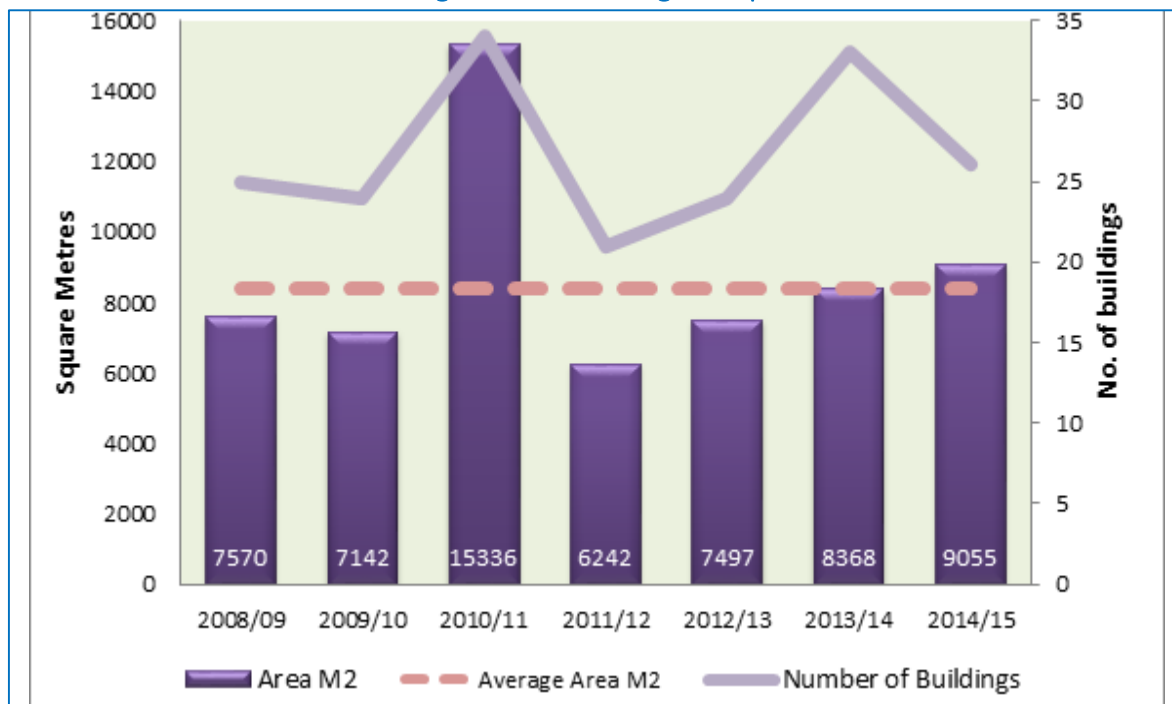
<sup>15</sup> Ibid pg. 7

- 5.8 In the future, more respondents intend to grow in scale than to downsize. The biggest challenge remains that net farm incomes are low and may decline further, for a proportion of farms. A further concern relates to farmers' strongly expressed wish to undertake more landscape management, with public funding to enable this; whereas it is not yet certain that such funding will be widely available on Exmoor.
- 5.9 The study concludes by saying that on the whole, Exmoor's farmers appear resilient with good age structure and a range of farming strategies, there are some signs of recovery in incomes and/or fortunes since 2005 for hill farms, but lowland livestock marginal farms are still pushed hard to maintain returns as their level of policy support has been declining, in some cases significantly.

### Planning Permissions

- 5.10 Chart 10 below shows the number of agricultural buildings that have been completed since the 2009 ELR. With the exception of 2010/11, the number of agricultural buildings completed has remained fairly consistent, which demonstrates a sustainable growth in the agricultural sector and supports the findings of the farming study in that farming on Exmoor remains fairly resilient.

Chart 10: Agricultural Buildings Completions



## Analysis

- 5.11 The conclusion of the 2009 ELR still stands in that, it is clear that issues facing farming today are not generally planning issues but are for the most part wider ranging issues at national and international levels. However, planning does have a role in helping rural land based businesses to protect and enhance the landscape and to diversify through appropriate development. The policies in the Publication Draft Local Plan recognise the importance of enabling farm businesses to become more competitive, comply with changing legislation and associated guidance, diversify into new agricultural opportunities and to adapt to changing markets. Consequently, policies seek to support agricultural development through providing for new or replacement buildings, tracks and structures or extensions required for agricultural and forestry purposes.

## Public Sector Services

- 5.12 The 2009 ELR noted the importance of the public sector as a provider of jobs within Exmoor National Park, stating that there was a small proportion of public sector jobs within the B1 category but that the majority of jobs in public administration, health and education services fall within the category of non-B class jobs.
- 5.13 The ELR showed that public sector employment (PSE) accounted for 18.7% of all jobs within the Exmoor National Park and that this was expected to rise by 8.4% to 1,030 by 2026. However, the 2009 ELR acknowledged that future changes in the provision of healthcare and education and indeed all public sector jobs are dependent on both national and local policy in respect of investment in public sector services.
- 5.14 In 2010 a coalition government was formed that adopted a policy of austerity which has resulted in cuts to the public sector and consequential loss of employment within the sector. Further austerity measures are continuing with the present conservative government who will remain in office until at least the elections in 2020. The consequences of the austerity measures are borne out in the latest ONS figures which show that in the South West for example, public sector employment has fallen by 19% from 2008-2015. This is in stark contrast to the rise that was predicted by the 2009 ELR and is a much larger fall than in England as a whole which has seen a 13.5% drop in public sector employment over the same period. Conversely, there has been a rise of around 10% in private sector employment over the same period, both regionally and nationally. Indeed, private sector employment, at 25,953 million, has risen in every quarter from December 2011<sup>16</sup>.
- 5.15 The fall in public sector figures is not only due to austerity measures; other factors have played their part. For example, there was a significant fall in public sector education in June 2012, as a result of the reclassification of further education colleges and sixth form college corporations into the private sector.

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<sup>16</sup> Office of National Statistics

Table 7: Public Sector Employment

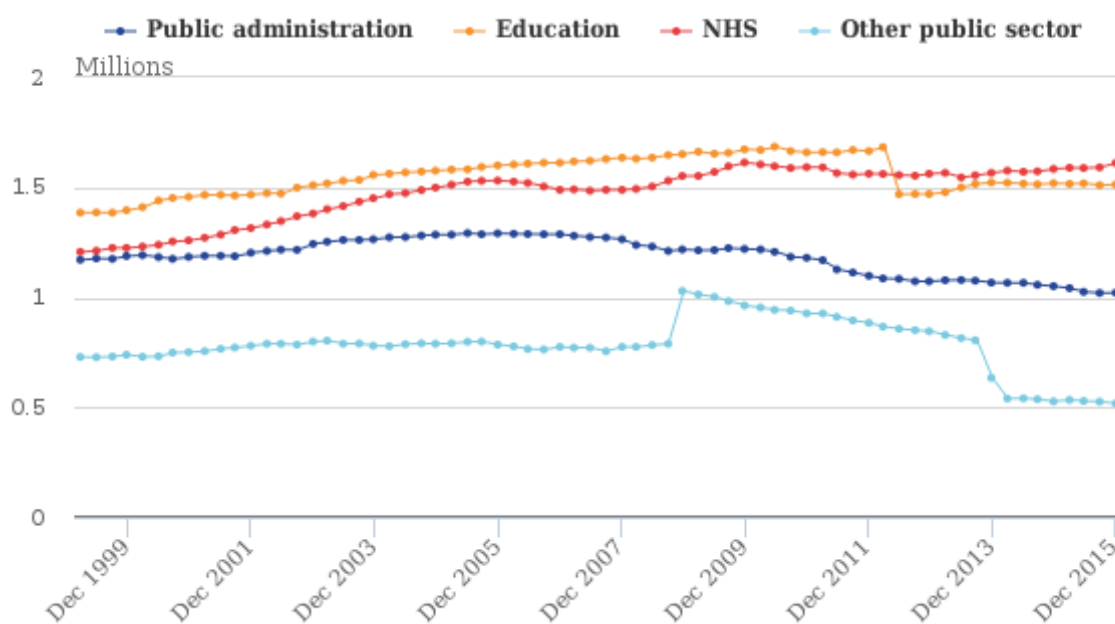
	2008	2015	% change
Public Sector South West	519,000	436,000	-19
Public Sector England	4,840,000	4,264,000	-13.5
Public Sector GB	6,072,000	5,349,000	-13.5
Private Sector South West	2,054,000	2,281,000	11.1
Private Sector England	19,947,000	22,079,000	10.7
Private Sector GB	23,661,000	25,953,000	9.7

Source: ONS September 2015: Public Sector Employment

### The Public Sector by Industry

- 5.16 The 2009 ELR provided that approximately 90% of public sector jobs within Exmoor National Park fall within the education and healthcare categories. It showed that there would be a fall in employment in education and a rise in health and social care, and this is now happening nationally.
- 5.17 Since June 2012, the NHS has employed the largest number of public sector workers. At September 2015, the NHS accounted for around 30% of all PSE. Employment in the NHS increased by 3,000 (0.2%) on the previous quarter and by 18,000 (1.1%) on the previous year. However, in September 2015, employment in public sector education decreased by 10,000 (0.7%) on the previous quarter and by 6,000 (0.4%) on the previous year. Prior to June 2012, public sector education employed the largest number of public sector workers.<sup>17</sup>

Chart 11: UK public sector employment by selected industries, March 1999 to December 2015, seasonally adjusted



Source: Office for National Statistics

<sup>17</sup> Office of National Statistics



- 5.18 It is recognised that the level of public sector employment including provision of social and healthcare services will not only be influenced by government policy, but also the need for services as determined by demographic changes over time. The changing employment levels within the education and healthcare sectors accord with the trends that would be expected in view of the anticipated ageing of the local population.

### Analysis

- 5.19 It is unlikely, due to government austerity measures and public sector cuts, that Exmoor National Park will see the rise in public sector employment that was forecast in the 2009 ELR. However, despite uncertainties in the direction of policy and public sector finances in the longer term, the public sector is expected to remain an important element of Exmoor's economy.
- 5.20 Decline in employment levels of certain parts of the public sector should not generally affect the employment land that is utilised by the public sector within the National Park, given these buildings are still required to continue with public sector operations and there are generally a low number of public sector buildings in the National Park. The local plan policy of protecting and enhancing employment land in the National Park should therefore remain.

### Retail

- 5.21 Following the 2009 ELR, a Retail Study was produced in 2011 which illustrated the strength of the retail and service offer in the larger centres of Dulverton, Dunster<sup>18</sup>, Lynton / Lynmouth, and Porlock. It found that these rural centres all have surprisingly strong roles for convenience and comparison shopping for their diminutive sizes. This is a consequence of both visitor spend and also relative isolation, and therefore greater patronage by locals. These two issues reinforce each other as, for example, convenience stores will be bigger and offer a wider range of goods because of the visitor spend 'boost', which also benefits residents. In addition, all four centres in the National Park contain a range of relatively high value comparison stores, selling art and crafts, clothing, outdoor gear, and gifts, mainly to visitors. These are complemented by the numerous cafés, restaurants, hotels and B&Bs. Taken as a whole this range of shops and services makes up a significant part of the bedrock of the local economy of these settlements.
- 5.22 The same is true, to a lesser extent, of the Exmoor villages. The retail study found that the local shops and services in these villages are doing remarkably well considering the very small size of most of these settlements. The study provided that planning can do little to support them, aside from maintaining and enhancing the sustainability of the local communities who support the shops, and supporting the visitor economy as a whole.

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<sup>18</sup> Dunster is not classified as a rural centre by ENPA, but is included in this study given its important retail and tourism role



- 5.23 The retail study concluded that the retail sector and services in the rural centres of Exmoor National Park, are well established and although there was not a case for growth, planning should continue to retain and enhance the retail and service offer in the rural centres and villages.
- 5.24 The Publication Draft Local Plan policies HC-S6, HC-D18 HC-D19, seek to guard against the loss of services and facilities whilst allowing existing shops, services and facilities to develop and modernise in a sustainable way so that they can be retained for the benefit of the community. Policies also make provision for new or extended community services and facilities where it is demonstrated to meet the needs of those communities and rural residents.

## Tourism

- 5.25 The 2009 ELR showed that tourism was the largest single employment sector in Exmoor and is a key source of income and activity. The importance of tourism can be understood in terms of visitor numbers, expenditure and employment levels. The 2009 ELR showed that Exmoor received approximately 2 million visitor days and this trend has continued (see table 8 below). Visitor spend has remained constant, as the rise can be explained by inflation.

**Table 8 Visitor days and visitor spend**

	2007	2009	2014
Visitor days (millions)	2.08	2.02	2.04
Visitor spend (uninflated figures, millions)	71.18	85.16	105.24
Visitor spend	78.37*	102.43**	105.24**

\*(2007 indexed, millions)

\*\* (2014 indexed, millions) – inflation 2-3% a year – explain figures.

- 5.26 Table 9 below shows that there has been a slight fall in the number of those staying in serviced accommodation but conversely a rise in those staying in non-serviced accommodation. This is a reflection of the preference for non-serviced accommodation nationally, and in addition the increase in the availability of non-serviced accommodation through the rise in second homes and these being rented out for holiday use.

**Table 9 Number of Visitor Days and Expenditure**

Category	Number of visitor days		
	2008	2009 (000s)	2014 (000s)
Serviced accommodation	329,050	299.71	307.87
Non –serviced accommodation	595,260	559.07	675.57
Staying with friends and relatives	40.880	40.11	41.61
Day visitors	1.118.680	1.13m	1.01m
<b>Total</b>	<b>2,083,880</b>		<b>2.036m</b>

\*2014 indexed

5.27 Table 10 shows that for serviced accommodation, there has been a small drop in provision, which is reflected in the drop in visitor numbers who stay in serviced accommodation. Conversely table 11 shows that there has been a rise in self-catering provision which reflects the rise in demand for those staying in non-serviced accommodation. This may well be due to the economic downturn which could have resulted in a choice of more affordable non-serviced accommodation.

**Table 10 Serviced Accommodation**

	<b>2014</b>	<b>Change on 2009</b>
Serviced accommodation total	201	-12
+50 room	1	0
11-50 room	21	-2
< 10 room	179	-10

**Table 11: Non Serviced Accommodation**

	<b>2014</b>	<b>Change on 2009</b>
Non serviced accommodation total	287	+69
Self-catering	261	+69
Static caravans/chalets	0	0
Touring caravans/camping	21	+1
Youth Hostels	5	-1

5.28 Over the past five years, caravan and camping sites have proved relatively resilient to the poor economic conditions that shook the United Kingdom. After declining sharply in 2009-10, the industry recorded solid growth due to the staycation phenomenon. Challenging economic conditions encouraged many to travel domestically, to make trips to campsites or holiday parks near the coast or in the British countryside, rather than forgoing a holiday altogether. Growth has also been supported by the expansion of glamping sites, luxury campsites that offer modern facilities and services, such as Wi-Fi, and aimed at higher income customers, who may not normally camp<sup>19</sup>.

### Analysis

5.29 There has been a general decline in serviced accommodation and the weight of the emerging plan policies may have been a material consideration to this effect. Since 2010/11 6 guesthouses and 1 hotel have reverted back to dwellings, making use of policy RT-D3 which allows a guesthouse or hotel to change to a principal residence dwelling if it was formerly a single residential dwelling on 1<sup>st</sup> July 1948 or built as a single residential dwelling subsequently. However, advantage has been taken by 2 providers to date, of the new flexibility offered by the emerging tourism and recreation policies which aim to encourage entrepreneurship in provision of serviced accommodation, whilst minimising the

<sup>19</sup> <http://www.ibisworld.co.uk/market-research/caravan-camping-sites.html>

risk. Policy RT-D1 allows providers to seek a change of use from a residential dwelling to serviced accommodation, whilst attaching a condition to allow that property to be used either as C1 hotels or C3 dwellings.

- 5.30 However, generally, the tourism sector is continuing to grow as predicted by the 2009 ELR. In line with local plan policies, the protection of the local environment will continue to be important in ensuring that the long term viability of the tourism sector can be maintained and enhanced. Given the importance of tourism to the Exmoor economy, policies within the Publication Draft Local Plan are generally supportive of tourism development and have been developed to allow more flexibility in tourism accommodation and development to provide for diversification and entrepreneurship, whilst minimising risk where possible.

## 6. CONCLUSIONS AND RECOMMENDATIONS

- 6.1 This report was undertaken to update on key evidence in the 2009 ELR to inform the Exmoor Local Plan. It was important to ascertain whether recent data and policy changes would necessitate a change to the economic policies of the Exmoor Draft Publication Local Plan.

### Key Findings

- 6.2 Analysis of the 2011 census data showed that there had been a fall in the population of Exmoor so that it is now lower than the 1991 census. However, despite the fall in population, Exmoor contains a population that is more economically active and more highly qualified.
- 6.3 Unsurprisingly, given the small economy of Exmoor and the character of the area as a National Park, farming, retail, tourism and the public sector industries remain dominant economic sectors within Exmoor. The importance of non-B class sectors to the Exmoor economy therefore remains and it is anticipated that this will continue. Plan policies to support this sector are therefore still appropriate.
- 6.4 There have been significant changes to planning policy and the Government is committed to promoting sustainable development. However, there is still a commitment to protecting National Parks and safeguarding rural services and facilities. In accordance with the NPPF, the Publication Draft Local Plan sets out an approach to sustainable economic development that protects and enhances the National Park but allows for appropriate small scale business development whilst safeguarding employment land and rural services and facilities.
- 6.5 Since the 2009 ELR, there have been a number of initiatives to improve mobile infrastructure and broadband delivery, which have been supported by the emerging policies of the Publication Draft Local Plan, and have benefited residents, businesses and visitors to the National Park, having a positive effect on the economy through providing opportunities for the self-employed, those wanting to set up business in the National Park and home based employment.

- 6.6 Since the 2009 ELR, there has been a steady growth to the economy with three larger business developments and a number of smaller developments demonstrating that the adopted Plan policies and the Publication Draft Local Plan policies, which are coming into effect, do allow for the growth of existing businesses and for new businesses to set up and or diversify through appropriate small scale development or conversions.
- 6.7 The 2009 ELR predicted that the level of employment development within Exmoor would be very limited. To date, the development of B1 uses has far exceeded the highest forecast growth of the 2009 ELR of 250sq metres to 2026, with a net growth of 3280sq metres. However, without the three larger developments the net growth would be 62.5 sq. metres which is in line with the forecasted growth of the ELR.
- 6.8 The growth in B8 is also significant, partly as a result of the Cutcombe Market development. The highest forecast for B8 uses was a requirement for 650sq metres. 500 square metres of that has already been built out, 280sq metres resulting from the Cutcombe Market development.
- 6.9 The growth resulting from these three major development should not cause any alarm or signify a need for further forecasting of growth in B uses. Rather, these developments show that policies both within the Plan and the Publication Plan, have allowed for the expansion of existing businesses within their premises.
- 6.10 As such, the 2009 ELR recommended that the Local Plan should contain policies for the release of appropriate sites and premises for development in response to emerging needs. This approach put forward in the Draft Publication Plan has enabled sites to come forward throughout the National Park in the manner that reflects the character of the local economy and emerging requirements. It reflects the reality of local circumstances and the expected continuation of past trends
- 6.11 The 2009 ELR suggested that it is likely that much of the new employment space would result from conversions and that it was not possible to ascertain which premises are most likely to be converted. Hence, the allocation of sites that are likely to come forward for employment purposes could not be achieved with an acceptable degree of accuracy. As such, the allocation of land or premises for employment purposes would not serve a positive economic function as there could be no realistic assurance that such land would come forward for development within the plan period.
- 6.12 Given that there has been no significant changes to the character and make-up of the Exmoor economy, and that the Exmoor economy is continuing to grow through appropriate small scale business development, it is recommended that the recommendations of the 2009 ELR, as set out above, continue, and that the policy approach contained in the Publication Draft Exmoor National Park Local Plan remain.

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