10 ACHIEVING ACCESSIBILITY FOR ALL

SUSTAINABLE TRANSPORT

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

Objective 18*. To support sustainable transport for residents and visitors by improving public and community transport services and opportunities for walking, cycling and horse riding including linkages across the National Park boundary.*

Objective 19*. To minimise the net emissions of carbon dioxide and other greenhouse gases into the atmosphere, and support measures which contribute to carbon neutrality in ways that both conserve and enhance the National Park.*

PURPOSE OF THE POLICIES

10.1. These policies set out how the National Park Authority will work with Somerset and Devon County Councils as the Highways and Transport Authorities and transport providers to encourage sustainable transport for residents and visitors, supporting public and community transport services, accessibility, opportunities for walking, cycling and horse riding, and minimising emissions of greenhouse gas emissions. They set out the approach to transport infrastructure, transport and accessibility requirements for new development, traffic management and parking provision.

NATIONAL POLICY CONTEXT

10.2. National policy[434] states that transport policies have an important role in facilitating sustainable development and contributing to wider sustainability and health objectives. Transport should be balanced in favour of sustainable transport modes, particularly those than minimise greenhouse gas emissions and reduce congestions, however it is recognised that different policies and measures will be required in different communities and will vary in rural areas. New development should take account of sustainable transport modes in their location and design, facilitated through a Travel Plan.

10.3. Cross boundary working with neighbouring authorities and transport providers is advocated to develop strategies for the provision of viable transport infrastructure to support future development. Development that generates significant amounts of movement should be supported by a Transport Statement or Transport Assessment, and are located where the need to travel is minimised taking into account policies set out in National Policy for rural areas, particularly conserving the landscape and scenic beauty in National Parks.

10.4. Guidance is also set out in relation to the setting of local parking standards for both residential and non-residential types of development.

10.5. The National Parks Circular promotes sustainable low carbon transport and travel in its vision for National Parks that helps to reduce greenhouse gas emissions. It also encourages close working between National Park Authorities and Transport Authorities in promoting more sustainable travel choices. The circular reinforces the strong presumption against any significant road widening or building of new roads through a National Park unless there are compelling reasons where benefits significantly outweigh the costs.

CONTEXT

10.6. The rural nature of much of the National Park, and its dispersed population, means that the majority of people rely on the private car to access jobs, services and facilities. The settlement strategy set out in GP4 Spatial Strategy recognises that new development should be focused in the named settlements to help maintain the future sustainability, self-sufficiency and resilience of these settlements, and should not lead to a severe increase in traffic. Accessibility to essential services can be difficult for those who do not have access to a private car, or regular public transport services. The National Park Authority will encourage Transport

[434] National Planning Policy Framework March 2012 (DCLG)

Authorities and transport providers to support the ongoing provision of public transport services, and to encourage demand-responsive community transport initiatives, particularly in those areas where regular public transport services are not available. Similarly, car-sharing clubs are another means of improving accessibility in a rural area, and can also be helpful in reducing the need for second cars in a household and therefore the burden of related costs.

10.7. As well as encouraging more sustainable modes of transport for the resident population and those who work in the National Park, the National Park Authority will also encourage visitors and tourists to use non-car modes of travel to the National Park, and to get around once here. The majority of visitors travel to Exmoor by car, and monitoring shows that during the summer months visitor traffic has a substantial impact on traffic levels within the National Park. As a consequence there is some congestion experienced during these peak periods. Exmoor has an excellent rights of way and access network, which provides opportunities for visitors to enjoy the National Park through walking, cycling, and horse-riding (see Section 9 Achieving Enjoyment for All). In particular, encouragement will be given to alternative modes of travel such as public and demand responsive transport, walking, cycling, and horse-riding, and by improving information provision to make it easier for visitors to travel without their car and generally help to improve air quality. Opportunities for enhancement through green infrastructure will also be encouraged in accordance with policy CE-D2 (Green Infrastructure Provision).

10.8. Transport is a significant contributor to greenhouse gas emissions (see Section 6 Responding to Climate Change) and consequently the policies in this Plan seek to reduce emissions where possible and support low carbon transport options such as electric vehicles and bicycles. These are becoming more widespread, and the National Park Authority will encourage the appropriate provision of electric charging points in new developments and at suitable locations across the National Park. Where possible and appropriate, these electric charging points should be powered by renewable energy sources, in accordance with CC-S1 and CC-S3. There are also concerns over the future availability and cost of fuel, the policies set out below to encourage alternatives to the car or greater car sharing, will therefore not only help mitigate climate change emissions, but also potentially help secure more affordable means of transport in the National Park.

10.9. Information Communication Technology (ICT) is likely to have an increasingly important role in reducing the need to travel and supporting a low carbon future. Although not everyone will choose to use technology in the place of travel, more people are able to work from home, shop via the internet, or access information and services, particularly when they have access to faster broadband connections (further information on the approach to ICT is given in AC-S1 Electricity and Communications Networks).

AC-S1 SUSTAINABLE TRANSPORT

1. The National Park Authority will encourage sustainable modes of transport through working with Highways and Transport Authorities, transport providers, local communities, and where appropriate, neighbouring authorities to:
   - **a) Support public transport provision, community based demand-responsive transport and car sharing**
   - **b) Encourage provision for walking, cycling and horse-riding including cross-boundary linkages with neighbouring authorities (RT-D12)**
   - **c) Support low carbon travel**
   - **d) Improve information provision to make it easier for residents and visitors to travel without a car.**

TRANSPORT INFRASTRUCTURE

CONTEXT

10.10. Although road maintenance and improvement schemes within existing highway boundaries do not require planning permission, consultation arrangements exist with the Highway Authorities to enable the National Park Authority's views to be heard before schemes are implemented. Many of Exmoor's roads, bridges and fords are historic and attractive features in their own right. Hedgebanks and hedges, trees, fingerposts, traditional bus shelters and other roadside features also add to the character of Exmoor's road network. Highway maintenance or improvement works can result in the loss of character or cause damage to ecological or historic features.

TRANSPORT INFRASTRUCTURE CONSIDERATIONS

10.11. The National Park Authority will encourage Highway Authorities to ensure that any maintenance or improvement works are carried out to the highest environmental standards and in keeping with local character. This includes minimising disturbance to local communities or wildlife, avoiding pollution of watercourses, loss of wildlife interest, impacts on local amenity or visual impacts, and supporting environmental enhancements where possible. Any potential impacts on the access network should be dealt with in accordance with RT-D12 (Access Land and Rights of Way).

10.12. In addition climate change adaptation measures will be required, particularly in response to more extreme weather events. Surface water is already having an impact on the lifespan of road surfaces. The National Park Authority will work with Highways Authorities and partners to identify the areas of the transport network that are at greatest risk from the impact of climate change (including coastal change) and support measures that enhance its resilience. The choice of materials should maximise sustainable drainage (SUDS) and reduce run-off.

10.13. The National Park Authority will work with Highways Authorities, local communities and businesses to ensure that highway safety is not compromised, and avoid unnecessary highway signage and other forms of highway structures, which would have an adverse impact on the landscape and street scene. Certain visitor attractions are eligible for advance signing using the Highway Agency's 'white on brown' tourism signs, which are paid for by the individual operator and are authorised by the Highway Authority. However Exmoor National Park Authority should be consulted on individual proposals in the National Park. Signs, road markings, barriers and traffic signals should be kept to a minimum and–comprehensive approaches to local signing and advertisement will be promoted where benefits to local character, amenity and highway safety can be achieved (refer to CE-D4 for further information on advertisements).

10.14. Upgrading of existing routes designed to accommodate higher traffic speeds would be resisted by the National Park Authority as inconsistent with the National Park purposes. Proposals for new roads will only be considered where they are required for access to new development or enable substantial environmental gain. Any new access roads would need to be proportionate to the scale of development and designed to the highest standards that are appropriate to the character of the local landscape and built environment.

AC-S2 TRANSPORT INFRASTRUCTURE

1. Exmoor National Park Authority will work with Highways Authorities and local communities to ensure that works to highways and transport infrastructure including traditional fords and bridges, road maintenance and improvement schemes, parking provision or new access roads, signage and street furniture reflect local character and:
   a) Are designed and constructed to conserve and enhance the natural beauty of the National Park, using materials and finishes that are appropriate to the character of the local landscape and built environment (CE-S1 Landscape Character, CE-S4 Cultural Heritage, and CE-S7 Design & Sustainable Construction Principles).
   b) Maintain and, where possible, enhance the rural character of roads.
   c) Retain (or if this is not possible, replace like for like) existing traditional street furniture and highways signage such as fingerposts, milestones, cast iron signs or other features important to the character of the area.
   d) Maintain and protect biodiversity (CE-S2).
   e) Incorporate wildlife enhancements and landscaping schemes where appropriate.
   f) Maintain and enhance existing rights of way in accordance with RT-S1 (Recreation and Tourism) and RT-D12 (Access Land and Rights of Way).
   g) Minimise disturbance and damage during maintenance or construction.
   h) Minimise lighting (CC-D1), highways signage and reduce clutter.
   i) Take account of road safety interests particularly for non-motorised modes of transport, and the capacity and function of the road network.
   j) Support measures to increase future resilience of transport infrastructure at risk from climate change and extreme weather events.

2. New roads are not considered to be appropriate in the National Park context, except where they are required for access to new development or would result in substantial environmental gain.

TRANSPORT AND ACCESSIBILITY REQUIREMENTS FOR DEVELOPMENT

CONTEXT

10.15. Applications should be located, designed and planned to avoid community severance and encourage a shift of priority towards pedestrians, cyclists, horse riders and public transport. They should seek to create environments that are attractive and that encourage travel by modes other than the car to jobs, services and the wider transport network. Opportunities to support low carbon travel, such as installation of electric charging points, will be encouraged, where these are in keeping with local character. Car share clubs will also be supported, particularly where this helps to reduce isolation for those who do not have access to a private car.

10.16. Development, including the change of use of buildings can lead to a requirement for road improvements and further maintenance. Conserving and enhancing the National Park and its special qualities and the safety of non-car users will be the primary criteria in the planning and design of transport and its management. Standard highway solutions are sometimes used as a development design starting point which can have the effect of discouraging the exploration of good design and local distinctiveness, which are particularly important attributes for development in Exmoor National Park. Solutions will be sought which incorporate and combine the principles of highway safety with good design for the area, contributing to local distinctiveness. Opportunities for wildlife enhancement will also be encouraged.

10.17. Any new development should be of an appropriate type and scale so that it can be safely serviced by the existing road network. The traffic likely to be generated by development proposals should not exceed the capacity of the local road network; cause unacceptable deterioration in air quality or the natural or built environment; or prejudice road safety interests.

10.18. Contributions may be required for transport enhancements (including measures set out in Travel Plans) to improve the safety, enjoyment and convenience of non-car modes of travel including (but not necessarily limited to): footpaths, bridleways, cycleways, car-sharing

facilities, highways, public transport provision and infrastructure, car parking, motorcycle and bicycle parking and travel planning (GP5 Securing Planning Benefits - Planning Obligations).

TRANSPORT ASSESSMENTS

10.19. Whilst the majority of development proposals within the National Park are not likely to generate significant levels of traffic, such proposals may occasionally arise for example a farm diversification scheme or new visitor facility. In such cases, applicants will be required to prepare and submit a Transport Assessment (TA) or in less complex cases, a simplified Transport Statement[435] in consultation with the relevant authorities, setting out the measures that will be taken to deal with the anticipated transport of the scheme, with emphasis on improving accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport. In addition, a Travel Plan (TP) should be produced to ensure that the proposal delivers sustainable travel outcomes including through minimising the level of trips generated, demonstrating how additional trips will be accommodated, and how accessibility to the site by different modes of transport will be achieved. If necessary, a separate Air Quality Assessment may be required to consider in more detail impacts on air quality and any mitigation required. Reference should also be made to Design and Access Statements (see CE-S7 Design and Sustainable Construction Principles). These Assessments will be used to determine whether the impact of the development in transport terms is acceptable (including the impacts of traffic generated, greenhouse gas emissions, impacts on air quality, road safety, and the special qualities of the National Park).

AC-D1 TRANSPORT AND ACCESSIBILITY REQUIREMENTS FOR DEVELOPMENT

1. **In designing new development applicants should:**
   a) **Demonstrate all opportunities have been taken advantage of to encourage safe and sustainable modes of transport including through improved infrastructure such as foot and cycle paths, cycle parking and storage, rights of way improvements or linkages and electric charging points.**
   b) **Avoid community severance and ensure good access for pedestrians and cyclists from new development to nearby services and facilities including public transport links.**
   c) **Support the provision of car club and car sharing facilities where appropriate.**
   d) **Ensure that the design and details of highway works which are required for new development proposals are appropriate in scale to the development and contribute to the conservation or enhancement of the area in accordance with policies CE-S1, CE-S2, CE-S3, CE-S4 and CE-S7.**
2. **Where development is likely to generate severe levels of traffic, applicants will be required to prepare a Transport Assessment or Transport Statement, an Air Quality Assessment where necessary, and a Travel Plan to ensure that the proposal delivers sustainable travel outcomes.**
3. **Development which will cause unacceptable levels of traffic in terms of the environmental or physical capacity of the local road network, or would prejudice road safety interests, will not be permitted.**

[435] National Planning Policy Framework (2012) DCLG para 32

TRAFFIC MANAGEMENT AND PARKING PROVISION

CONTEXT

10.20. The National Park has no major strategic road or rail corridors. The two principal routes on Exmoor are the A39 and A396, which form the main routes for traffic, including visitor traffic during the tourism season. The short section of A399 that passes through the western edge of the National Park is identified as a county freight route. Local freight routes, for local access only, are designated for the B3190 (Ralegh's Cross towards Washford Cross), the tertiary route from Machine Cross to Heathpoult Cross, and the east/west route across the National Park consisting of the B3224, B3223 and B3358. The small rural lanes framed by beech hedgerows serving local farms and communities are important to the character of the National Park and are important historic and attractive features in their own right. The responsibility for roads and traffic management lies with Devon and Somerset County Councils (as Highway Authorities), therefore the implementation of policies rely on a close working relationship with both authorities. The Exmoor Route Network, as shown on the Proposals Map and the Key Diagram, provides the framework to ensure that traffic uses roads most suited to the purpose of its journey.

10.21. Traffic flows on Exmoor are relatively stable, although levels increase significantly during the main summer months when greater numbers of visitors to the National Park. Although traffic pressures across the National Park as a whole are not severe there can be specific areas which face congestion issues and parking problems particularly during the busy holiday periods. The areas with the highest average daily traffic in the National Park where problems of congestion occur include Lynton/ Lynmouth, Dunster, Dulverton and Porlock as well as tourist hot-spots such as Tarr Steps and Valley of the Rocks.

10.22. The effects of traffic are seen in the congestion of streets and over-demand for parking space in some towns and villages at peak periods. This can result in a reduction in the quality of life including air quality and the experience of the National Park for residents and visitors, damage to the physical fabric of buildings and, in some cases, restrictions on the passage of buses and emergency vehicles. Conditions for pedestrians, cyclists, horse-riders and disabled people can be made difficult by traffic and inappropriate access by heavy goods vehicles (HGVs), which may contribute towards community severance and poor accessibility to local services including public transport. The National Park Authority will seek to ensure that the needs of more vulnerable road users such as walkers, cyclists and horse-riders are taken account of in traffic management.

10.23. In settlements, streets should be inclusive for all and attractive places in their own right rather than just corridors for traffic[436] (see CE-S7 Design and Sustainable Construction Principles). Opportunities should be identified to minimise the adverse impacts of traffic and make provision for the needs of all users, giving priority to pedestrians and other non-car modes of travel. The National Park Authority will encourage innovative approaches to reconcile traffic and pedestrian movement including shared surfaces which can also reduce 'clutter' and enhance the street scene. Outside the named settlements there are concerns that high traffic speeds on narrow roads and lanes put other users such as walkers, horse riders and cyclists at risk. Where opportunities arise, the National Park Authority will encourage the provision of alternatives to busy roads that link up important footpaths and bridleways, safer crossing points, and other safety measures.

10.24. Some traditional bridges are showing signs of physical deterioration as they are carrying volumes and weights of vehicles greater than intended for its original use. The physical capacity of these roads and alignment is, in the main, unsuited to larger vehicles and heavy flows of traffic at higher speeds. It is important to ensure measures are adopted in partnership with relevant transport authorities to reduce the pressure on such bridges through the Exmoor Route Network and advisory routes, particularly for coaches and lorries.

10.25. Heavy goods vehicle (HGV) movements on roads within the National Park are at significantly lower levels in relation to total traffic flows but large vehicles can still cause problems on narrow roads and in villages across the National Park. There has been a significant increase in delivery vans, some of which is likely to have resulted from the growth in internet

[436] DfT 'Manual for Streets' and 'Manual for Streets 2 - wider application of the principles'

shopping[437]. Whilst this is preferable in the National Park to additional HGV movements, such increases in traffic may in future benefit from co-ordination and shared deliveries using an appropriate size of vehicles suited to the small rural roads in the National Park.

10.26. The National Park Authority will support continued work by the Highways Authorities with hauliers and SatNav providers to encourage traffic, particularly lorries and HGVs, to use County Freight Routes to access the settlements on the edge of the National Park including Dunster, Minehead and Lynton/Lynmouth, with Local Freight Routes restricted to local access only (Exmoor Route Network as shown on the Proposals Map). The National Park Authority will also encourage Highways Authorities to ensure that diversionary routes and planned maintenance minimise disruption to local communities. The use of unsuitable will be discouraged through appropriate measures such as positive signing and SatNav route information.

PARKING

10.27. Parking provision is an important factor for Exmoor's communities and local businesses due to the high dependency on the car. However, providing adequate parking provision to reflect this, has to be balanced with impacts on landscape, the limited overall capacity of land available for development the National Park, and the need to encourage people to adopt sustainable modes of travel wherever possible and help contribute to reducing greenhouse gas emissions.

10.28. Within settlements, public car parks help to reduce the level of on-street parking and outside the tourism season can provide a useful facility for residents. In some locations there may be scope for rationalising, relocating or redesigning existing parking where this would achieve environmental gains. Reserving small car parks specifically for residents and the provision of community car parks within villages may also be part of an overall solution to parking problems, particularly if they are associated with other community facilities such as open amenity space, village hall or public toilets.

10.29. Exmoor is relatively well provided with parking facilities for countryside recreation. There is a presumption against providing for peak demand due to the impact on the natural and built environment, the seasonal and localised nature of congestion and the need to seek more sustainable solutions to the management of traffic and the demand for parking. Some existing car parks may be at risk from climate change and sea level rise, which will be covered by AC-S2 Transport Infrastructure. The emphasis will be to maximise the use of existing parking facilities. Extensions to existing sites or the creation of minor new facilities will only be contemplated where opportunities for informal recreation or new public access are developed, and always subject to conservation objectives (CE-S1 landscape character, CE-S2 biodiversity, CE-S4 cultural heritage).

10.30. The National Park Authority will work with Highways Authorities and local communities to find the best solutions to congestion and parking issues. Given the limited capacity for additional car parking and potential impact on special qualities, the focus will be on providing for community needs rather than peak parking capacity. Temporary solutions will be sought for peak parking demands in areas where this is causing environmental damage or adversely affecting the quality of life of local communities, including temporary provision of park and ride to manage parking and traffic at major events (AC-D3).

PARKING PROVISION AND STANDARDS

10.31. Policy AC-D2 guides parking provision in developments –the principle will be to minimise parking taking into account environmental constraints. Table [ ] *Guide to Parking standards* lists optimum levels of provision and is intended to guide applicants regarding the levels or car, cycle, motorcycle parking and parking for disabled people. Developments in more sustainable locations that are well served by public transport or have good walking and cycling links will be considered appropriate for lower levels of car parking provision. There may be circumstances such as change of use, or new development in restricted locations where it is not possible to accommodate parking. In order to enable otherwise appropriate development, the National

[437] Somerset County Council Freight Strategy

Park Authority will take into account the proximity of public parking (including on-road parking) and public transport when considering applications. Applicants will be expected to provide clear evidence to justify higher car parking provision. Proposals for higher levels of cycle parking will be favourably considered.

10.32. As land capacity for development is limited in the National Park, the design of parking provision in developments should avoid 'land-hungry' approaches to car parking, promoting a design-led approach that is well integrated with a high quality public realm and streets that are pedestrian, cycle friendly[438].

10.33. Policies RT-S1 (Recreation & Tourism), AC-S1 (Sustainable Transport) and AC-D1 (transport accessibility requirements for development) encourage walking and cycling both as a means of recreation but also to enable residents to access jobs, services and community facilities such as village halls and sports facilities. This can also support provision of Green Infrastructure (CE-S3, CE-D2). The National Park Authority has included standards for provision of cycle parking to encourage this, particularly in the named settlements. In most circumstances, 'Sheffield' type cycle parking stands will be adequate. At locations where stays are likely to be longer, for example at residential developments, workplaces, schools or hotels, secure, undercover cycle storage facilities will be required. Shared cycle parking facilities can be more efficient and require less space than individual facilities[439]. Motorcycling is also becoming more popular, and provision for motorcycle parking will also be encouraged in accordance with Policy AC-D2.

10.34. Policy AC-D2 also makes provision for people with disabilities. The design and dimensions for disabled parking bays should be in accordance with current Regulations[440] and allow for sufficient space for people with disabilities to transfer from vehicle to wheelchair. Bays can be combined with common 'transfer zones' to reduce space requirements. Bays should be level, and the surface of the accessibility zone should be firm, durable and slip resistant.

AC-S3 TRAFFIC MANAGEMENT AND PARKING

1. **The approach to traffic management on Exmoor will take into account the needs of all users including pedestrians, walkers, cyclists, horse-riders and disabled people, including through the use of shared surfaces where appropriate.**
2. **The Exmoor Route Network, as shown on the Proposals Map, will form the framework for traffic management in the National Park.**
3. **In the National Park there is a presumption against providing for peak parking demand. The National Park Authority will work with Highways Authorities, Town and Parish Councils and local communities to identify local solutions to congestion and parking issues in keeping with landscape character, providing for community needs and utilising temporary solutions for peak parking where necessary and appropriate.**
4. **Proposals for new development should make adequate provision for parking in accordance with AC-D2.**

[438] The Chartered Institution of Highways and Transportation, Guidance Note on Residential Parking, 2012
[439] Manual for Streets
[440] Building Regulations Part M

AC-D2 PARKING PROVISION AND STANDARDS

1. **Proposals will be permitted where they make appropriate provision for parking including for bicycles, motorcycles, disabled users and car sharing, guided by the standards set out in Table 10.1.**
2. **Car parking provision should be minimised, taking into account environmental constraints. Parking provision should be well designed and integrated with a high quality built environment. Developments in more sustainable locations that are well served by public transport or have good walking and cycling links will be considered appropriate for lower levels or in appropriate cases, no car parking provision. Proposals for higher levels of cycle parking will be favourably considered.**

Table 10.1: Schedule to Policy AC-D2 – Guide to Parking Standards	
Use Class and Description	**Cycle and Car parking**
A1 Retail	Non-food: 1/50m^2 Food: 1/16 m^2
A2 Financial and Professional Services	1/30 m^2
A3/A4/A5 Food and Drink	1/16m^2
B1 Business	1/30 m^2
B2 General Industrial	1/75 m^2
B8 General Warehouses and Distribution	1 car space per 200m^2 and 1 lorry space per 250 m^2
C1 Hotels	1 per 2 bedrooms
C2 Residential Institutions (hospitals & nursing homes)	1/40m^2 or 1 per 4 bedrooms
C3 Residential	1 or 2 bedrooms = 2 spaces 3, 4 or 4+ bedrooms = 3 spaces
D1 Non Residential Institutions	Health centres 1/25m^2 Schools 1 /2 FTE staff + 2 visitor spaces Churches, halls, 1/20m^2 HE/FE colleges 1/55m^2
D2 Assembly and Leisure	2a cinemas 1/12 seats 2b exhibition centres 1/22m^2 Leisure centres 1/40m^2

10.35. Demand for parking can increase during the peak tourism season. There is a presumption against providing for permanent peak parking demand due to the impact on the natural and built environment in the National Park. Instead, the scale of car parking provision should be commensurate with the average daily usage annually. In order to address higher levels of parking which may arise for limited periods during peak season, temporary overflow measures may be permitted where current parking arrangements are causing an adverse impact on the environment and character of the area and/or the amenity of local communities.

10.36. The design of temporary measures should be in accordance with the requirements for permanent parking (AC-D2 Parking Provision and Standards) and should not have an adverse impact on the landscape, wildlife, character or amenity of the permanent use of the area. Any permanent change to the landscape character, design, surfacing or layout of the site will not be permitted, unless the site is brownfield and it can be demonstrated that the change will be an enhancement in accordance with Policy GP6 and accords with Policy CE-S7 Design and Sustainable Construction Principles. However, it is likely that most temporary parking sites will be on greenfield land and any grassed surfaces will need to be retained and can be conserved by using reinforced mesh which can help protect the vegetation and soil structure. The site should be returned to its original use, design and layout once the temporary parking use has ceased. Restoration measures may be required to mitigate any adverse impacts on wildlife which have resulted from the temporary usage. Any necessary boundary changes to the site will need to accord with this policy and will be of a temporary nature and be reverted to their original position once the temporary parking use has ceased.

AC-D3 TEMPORARY PARKING

Temporary overflow measures may be permitted to accommodate peak parking demand only where the shortfall in parking is causing an adverse impact on the environment and character of the area, sensitive habitats and wildlife species and/or the amenity of local communities. The design of the proposal should be in accordance with the requirements for permanent parking (AC-D2 Parking).

ELECTRICITY AND COMMUNICATIONS NETWORKS

Objective 17. *To achieve high quality telecommunications and essential utilities and infrastructure in ways commensurate with the conservation of the National Park's natural beauty, landscape wildlife, cultural heritage and special qualities.*

PURPOSE OF THE POLICIES

10.37. The policies support improvements to the telecommunications network and electricity infrastructure that will help to underpin the vitality and viability of Exmoor's communities and the economy, and help to reduce the need to travel by car, whilst ensuring that the conservation of the National Park's natural beauty, landscape, wildlife and cultural heritage is not compromised. All statutory undertakers, including utilities and telecoms companies, have a duty to have regard to National Park purposes under Section 62 of the Environment Act (1995).

NATIONAL POLICY CONTEXT

10.38. National policy recognises the vital role that communications networks have for sustainable economic growth and the provision of community services and facilities, and encourages local planning authorities to support the expansion of electronic communications networks that include mobile telecommunications and high speed broadband[441]. The number of radio and telecommunication sites and masts should be kept to the minimum required for the efficient operation of the network, and any new sites should be sympathetically designed and camouflaged where appropriate.

10.39. Proposals for new telecommunications development should be supported by evidence to justify the development including consultation with other organisations, other possible siting opportunities (such as mast sharing, using existing buildings or structures), and certification that the development will not exceed non-ionising radiation protection guidelines.

10.40. The National Park Circular[442] encourages a communications infrastructure in National Parks that is fit for purpose so that they remain viable places for both businesses and communities to thrive (AC-S4 Electricity & Communications Networks).

CONTEXT

10.41. The rapid change and expansion of electronic communications technology and its increasing influence on how society and businesses function, means that access to digital technology and associated improvement of telecommunications infrastructure, including in rural areas, is a national priority[443].

FIXED LINE ELECTRICITY & TELECOMMUNICATION NETWORKS

10.42. The majority of properties on Exmoor are connected to the mains electricity network – however there remain a number of properties in more remote locations in the National Park that are not connected to mains electricity and are therefore reliant on generators and renewable energy technologies to meet their energy needs.

10.43. The fixed-line telecommunications network (British Telecom infrastructure) provides the traditional fixed-line telephone service to the majority of households and businesses on Exmoor and also access to broadband for those households within a reasonable distance of an ADSL (asymmetric digital subscriber line) enabled telephone exchange. None of the telephone exchanges within the National Park have been upgraded to ADSL2+ to enable faster data transmission. In large, densely populated areas, the fixed-line copper cabling continues to be upgraded to fibre-optic to enable superfast broadband services direct to the home or to the nearest telecommunication cabinet. Although, the cost of delivering this type of technology to rural homes is likely to be more expensive due to the dispersed and small scale

[441] National Planning Policy Framework (2012) DCLG
[442] English National Parks and The Broads Circular (2010) DEFRA
[443] Broadband Delivery UK (BDUK) – Department of Business Innovation and Skills

nature of rural settlements, the cost may reduce (see section on Broadband Internet Access below).

10.44. Overhead electronic and telecommunication transmission lines and poles are often disruptive features that adversely impact landscape and seascape character. Consultation events showed that a majority of respondents considered that there were too many in the National Park. Correspondingly there was support for undergrounding utility cabling to new developments and communities have expressed support for undergrounding overhead cables within settlements[444]. Western Power Distribution is working within the protected landscapes (National Parks and Areas of Outstanding Natural Beauty) in its region to identify potential areas for undergrounding existing overhead lines[445]. Within Exmoor National Park this has included programmes for undergrounding overhead lines in:

a) **Dulverton Conservation Area** - to enhance the quality of the built heritage,
b) **Hawkcombe** – to enhance the open character of the moorland landscape, and
c) **Porlock Marsh** - to improve the character of the coastal landscape and seascape**.**

10.45. Undergrounding overhead telecommunication lines in sensitive landscapes is also desirable and will be sought where opportunities arise.

MOBILE PHONE NETWORK

10.46. The Mobile Cellular Communications Network (mobile phone) network also has an important social and economic function in today's society. The launch of the second generation (2G) digital transmission which introduced data services such as text messages, dramatically increased popularity of mobile phones and correspondingly the network coverage. In 2000 only half of UK adults had a mobile phone; by 2010 this had increased to 91%. With the introduction of 3G, progressively more people are accessing mobile broadband services via new electronic communication devices[446]. The launch of superfast mobile broadband networks (4G) in 2013 enables networks to have considerably greater capacity and speed.

10.47. On Exmoor the mobile telecommunications network consists of a number of base stations which consist generally of a range of structures including some form of mast or monopole, and is predominantly owned by one network operator Everything Everywhere (a merger between T-Mobile and Orange). However coverage is limited due to Exmoor's topography and low population density and some communities experience either poor or no access to the mobile network.

10.48. Another component of the communications network is the Airwave Network providing voice and data communications for essential public services such as the police, fire and ambulance services. This secure network covers around 99% of the country and is not available for public use[447].

BROADBAND INTERNET ACCESS

10.49. Broadband internet access has become the 'fourth utility' for most of the UK's population. However there remains a broad divide between rural and urban areas in the quality and availability of this technology[448]. Where broadband internet is available and users have access to appropriate technology, the delivery of key public services has been transformed and businesses have the advantage of faster electronic communication.

10.50. The vast majority of Exmoor is served by British Telecom (BT) infrastructure, with a number of small scale satellite operators providing alternative networks in some communities. In sparsely populated rural areas such as Exmoor, areas known as 'not spots' and 'slow spots' exist where either there is no, or a very slow, broadband service due to the distance from the nearest telephone exchange.

10.51. The lack of access to high quality broadband in rural areas can have economic impacts on rural businesses, public service providers and communities. There is pressure on the farming

[444] Your Future Exmoor consultation 2010
[445] Western Power Distribution Report for Stakeholders 2010
[446] www.mobilemastinfo.com (Mobile Operators Association)
[447] www.airwavesolutions.co.uk
[448] Mind the Gap (2008) Commission for Rural Communities

community to have a high level of broadband connectivity due to the requirements from DEFRA to submit information online. Farms are rural and isolated and therefore very often can be within areas where broadband delivery is constrained. Limited access to broadband can also have social and personal implications for people in rural areas[449]. Consultation highlighted that people were overwhelmingly in favour of ensuring that all communities in the National Park have access to broadband technology and enhanced mobile phone coverage[450]

10.52. The Devon and Somerset Local Broadband Plan will meet the government's Universal Service Commitment (USC) and the roll out of next generation access, to provide improved broadband to businesses and communities across Devon and Somerset[451].

10.53. The roll out of improved and superfast broadband across Devon and Somerset will help to address the digital deprivation experienced in rural areas. Much of the demand in rural areas is driven by online shopping, banking and communication. Currently, the incidence of rural home working is as much as three times greater than for urban areas nationally and within the National Park almost a third of the working age population works at or from home[452]. The negative impacts of the digital divide are increasingly evident. However, existing telecommunications infrastructure has already benefited those rural areas with broadband access through: businesses relocating to rural areas from urban areas to enjoy a better quality of life; people moving out of cities on the basis they can work from home and access online services; and the potential for rural manufacturers and retailers to access worldwide markets[453] (see AC-S1 Sustainable Transport). Improving and adapting this infrastructure can ensure that the social and economic benefits of accessing digital technology are available across the National Park.

10.54. It is likely that a mix of technologies will have a role to play in providing the USC for improved and superfast broadband in remote rural areas. Where geographic densities (premises per square kilometre) are low the most cost-effective solutions are expected to be fixed wireless or satellite technologies. Mobile broadband coverage is also likely to be part of the solution to complement fixed network infrastructure in rural areas[454] (see AC-D4 Radio and Mobile Telecommunications Infrastructure).

INFRASTRUCTURE CONSIDERATIONS

10.55. Nationally significant infrastructure proposals will be determined by the Infrastructure Planning Unit within the Planning Inspectorate. A suite of national policy statements have been published to guide this process and substantial weight is given to ensuring the continued protection of National Parks[455].

10.56. The National Park Authority encourages utility operators and network distributors (including broadband roll out) to enter into pre-application discussions relating to future proposals and the consideration of sharing infrastructure, technological advances and solutions, landscaping and design issues[456]. Proposals for electronic and communications development should accord with AC-S4 and the relevant development management policy.

10.57. A condition will be attached to any permission to ensure that where communications infrastructure becomes redundant it will be removed from the site and the land reinstated to achieve environmental enhancement, unless an alternative use for the site has been agreed by the Authority.

[449] Rural Broadband: Why does it matter? (2011) Commission for Rural Communities
[450] Your Future Exmoor Consultation 2010
[451] Connecting Devon and Somerset – Superfast Broadband Public Consultation (April 2012)
[452] 2001 Census – 31.35% of people aged 16 – 74 in employment who work mainly at or from home within Exmoor National Park (to update when 2011 census data becomes available)
[453] Mind the Gap (2008) Commission for Rural Communities
[454] Broadband Delivery UK Theoretical Exercise: Conclusions and lessons learned (December 2010).
[455] Overarching National Policy Statement for Energy - Department of Energy & climate Change (2011)
[456] Joint Accord – Association of National Park Authorities, the Association for Areas of Outstanding Natural Beauty, The Mobile Operators Association (2004)

AC-S4 ELECTRICITY AND COMMUNICATIONS NETWORKS

1. **Development to improve the accessibility and standard of the electricity and telecommunications networks will be encouraged in order to contribute to thriving communities and businesses, and climate change mitigation. Great weight will be given to ensuring that the National Park and its special qualities are conserved and enhanced.**
2. **Proposals will be supported where:**
   a) **the location, siting, scale and design of structures will not cause any adverse impacts on landscape and/or seascape character (CE-S1), visual amenity, biodiversity (CE-S2) and cultural heritage (CE-S4) of the National Park and are consistent with the requirements of policies AC-D4 – AC-D6;**
   b) **co-operative working with partner organisations and utility operators has been demonstrated, to facilitate the sharing, utilisation and consolidation of existing communications infrastructure in rolling out new or improved communication technologies; and**
   c) **provision is made for the removal of apparatus and reinstatement of land when the apparatus becomes redundant.**
3. **Major (GP3 Major Development) and nationally significant transmission infrastructure including high voltage transmission lines and landfall cabling and substations from large scale offshore renewable energy schemes will be resisted.**

RADIO AND MOBILE TELECOMMUNICATION MASTS

CONTEXT

10.58. The Mobile Operator's Association (MOA) represents the four largest mobile network operators (Everything Everywhere, Vodafone, O2 and 3UK) and has introduced ten commitments to best siting practice including improved consultation with communities, pre-application discussion with planning officers and agreement on site sharing[457]. The Association of National Park Authorities[458] and National Association of Areas of Outstanding Natural Beauty hold a joint accord with the Mobile Operators Association that seeks to protect the special qualities of protected landscapes while making the best possible provision for telecommunication services[459].

INFRASTRUCTURE CONSIDERATIONS

10.59. The natural beauty of the National Park means that many locations are particularly sensitive to mobile communications development due to the visual intrusion of the mast or monopole structure and its impact on landscape character. Such structures appear as incongruous in the landscape due to their utilitarian appearance and strong contrast to rural surroundings. The location and design (including form, overall height, colour, siting and setting) of telecommunication masts and the ancillary equipment associated with a radio base station are therefore particularly significant to ensure that the development does not conflict with the National Park designation. The National Park Authority will work with mobile operators to seek positive solutions to enable the roll out of mobile technology across Exmoor in a way compatible with the National Park designation.

10.60. In order to conserve and enhance the National Park, the optimal environmental solution will be sought including requiring the sharing of existing infrastructure, consolidation and enhancement of existing sites, siting on existing structures/features, or the use of 'stealth designs' (where masts are disguised as trees or concealed in other ways). As with other vertical structures such as wind turbines (CC-D4), the visual impact of telecommunication masts, i.e. when disguised as other structures such as trees, should be minimised by avoiding

[457] www.mobilemastinfor.com
[458] Now English Association of National Park Authorities (ENPAA)
[459] ENPAA response to BIS Broadband deployment and sharing other utilities' infrastructure

breaking the skyline from public viewpoints including roads, public rights of way and access land. Other factors concerning siting may involve the site in relation to:

a) Areas designated for their conservation value.
b) Buildings including those of a historical or traditional character.
c) Residential property.

AC-D4 RADIO AND MOBILE TELECOMMUNICATIONS INFRASTRUCTURE

1. **Proposals for radio and mobile telecommunications development will only be permitted where:**
   a) **They will first seek to share existing infrastructure where there is capacity in landscape terms, and no increase in height of existing masts is required. Where it can be demonstrated that this is not possible:**
   b) **Apparatus will be sited on existing features such as buildings or trees; to minimise adverse effects on landscape character. Where it can be demonstrated that this is not possible:**
   c) **Apparatus is designed to be camouflaged and concealed as a natural or traditional feature as appropriate and will not be noticeable as a new telecommunications structure.**
2. **In determining all proposals:**
   a) **the highest standards of design will be sought in terms of colour, dimensions, construction and overall shape to minimise any visual impact;**
   b) **there will be no unacceptable cumulative or sequential visual impact with other vertical structures in the landscape;**
   c) **there will be no adverse effects on sensitive habitats and wildlife species (CE-S2);**
   d) **the amenity of nearby residents and visitors is protected;**
   e) **there are no unacceptable impacts on heritage assets (CE-S4); and**
   f) **opportunities for enhancement of the landscape including consolidation of any existing telecommunications infrastructure will be sought.**
3. **A condition will be attached to any planning consent to ensure that there will be ongoing management in place where trees are essential in providing camouflage to antenna within trees or for masts disguised as trees.**

FIXED LINE TRANSMISSION INFRASTRUCTURE

CONTEXT

10.61. In terms of electronic communications apparatus, the Electronic Communications Code[460] ensures that code operators should notify the National Park Authority, as the planning authority, of any intention to install electronic communications apparatus. This does not include service lines or replacement lines or poles. However, the Growth and Infrastructure Act 2013 adds to the list of considerations to which the Government must have regard in making regulations on the application of the Electronic Communications Code, to include 'the need to promote economic growth'. As such the making of the regulations deems that any duties relating to the National Parks in England and Wales[461] have been complied with until 6th April 2018 to promote the roll out of superfast broadband across the country. It is therefore recognised that the ability of the policies in this Plan to influence infrastructure development will be limited during this period and will effectively be governed by primary and secondary

[460] The Code was enacted to regulate landline telephone provision – it applies to infrastructure forming networks which support broadband, mobile internet and telephone, cable television and landlines. The code will be updated with regard to the Growth and Infrastructure Act.
[461] National Parks and Access to the Countryside Act 1949 – Section 11A Duty of certain bodies and persons to have regard to the purposes for which National Parks are designated (including statutory undertakers).

legislation[462] and a Code of Practice relating to the Electronic Communications Code for fixed line code operators[463].

10.62. Development consent is needed from the Department of Energy and Climate Change for all but the most minor lines in England and Wales. However, certain exemptions for the installation or replacement of 'minor' overhead electric lines do not apply within National Parks and notice is required to be given to the National Park Authority of the proposal to consider whether there would likely to be a significant adverse effect on the environment[464].

10.63. Overhead electricity[465] and telecommunication lines have considerable visual impact particularly in rural landscapes – by creating visual clutter and appearing incongruous in the landscape. New electricity or telecommunications cabling, including service lines to new development and cabling from renewable energy technologies will be expected to be underground.

BROADBAND ROLL OUT

10.64. It is recognised that the roll out of superfast broadband is important for the future prosperity of rural communities, and can mitigate the effects of climate change through reducing the need to travel. Sharing existing infrastructure has the potential to minimise adverse landscape impacts in the National Park. The first consideration in terms of future broadband deployment should establish whether or not the roll out can be achieved through the sharing and/or upgrading of existing infrastructure such as BT's telecommunications infrastructure; other telecommunications infrastructure including mobile phone masts; and other utilities infrastructure before other solutions are considered (AC-D4 Radio and Mobile Telecommunications Infrastructure).

OVERHEAD CABLING CONSIDERATIONS

10.65. Where it can be demonstrated that the need for the cabling (electricity and telecommunication cabling/lines) is essential in the National Park and cannot be addressed in another way, and that the cabling cannot be undergrounded because of other adverse impacts which can not be mitigated (consistent with policies CE-S1, CE-S2 and CE-S4) the National Park Authority will negotiate with the distribution network operator to select the least obtrusive route. The route should select a backdrop that makes sympathetic use of existing features such as hedgerows or wooded areas to break views of the line[466] and particularly avoid highly sensitive open landscapes, such as moorland, and skyline intrusion.

10.66. There are no high voltage overhead transmission lines in the National Park (i.e. the National Grid) and any proposals for such infrastructure that may come forward in the future will be strongly resisted. The Holford Rules are guidelines on overhead line routing first drawn up in 1959 and remain valuable guidance for selecting and assessing potential routes. The first rule in particular seeks to avoid major areas of highest amenity value – such as National Parks.

GRID CONNECTIONS TO OFFSHORE RENEWABLE ENERGY SCHEMES

10.67. Grid connections and substation infrastructure through landfall (the area associated with joining the offshore and onshore cabling) from nationally significant off-shore renewable energy schemes[467] will also be resisted as the installation of such major infrastructure would cause unacceptable damage to the sensitive landscape, seascape, natural environment and cultural heritage of the National Park. It is considered that the probability of such proposals along the Exmoor coast is low due to the high status of protection given to National Parks, as well as topographical constraints and the inability to connect to the National Grid transmission network.

[462] Part 24 of Schedule 2 to the General Permitted Development Order as amended by Statutory Instrument 2013 No. 1101 - The Town And Country Planning (General Permitted Development) (Amendment) (England) Order 2013

[463] Cabinet Siting and Pole Siting Code of Practice – June 2013 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/205744/Final_Cabinet_and_Pole_Siting_COP_Issue_1_2_.pdf

[464] Electricity – The Overhead Lines (Exemption)(England and Wales) Regulations 2009 – SI 2009/640

[465] Electricity Act 1989

[466] Holford Rules: http://www.nationalgrid.com/NR/rdonlyres/E9E1520A-EB09-4AD7-840B-A114A84677E7/41421/HolfordRules1.pdf

[467] Overarching National Policy Statement for Energy (2011) DECC

10.68. Exmoor National Park has had positive experience of small scale marine renewable energy installations and associated landfall (such as the single experimental marine turbine that was installed off the coast from Lynmouth); this technology contributes towards climate change mitigation and aspirations to become a carbon neutral National Park. Such small scale renewable energy technology is likely to be significantly less harmful in terms of the impacts on seascape (CE-S1), biodiversity (CE-S2) and cultural heritage (CE-S4). Proposals for small-scale/experimental marine energy technologies will be supported where the proposal is such that there is sufficient capacity within the existing electricity infrastructure or minimal upgrading of existing infrastructure is required. In these circumstances it should be demonstrated that the development is carried out to the highest environmental standards and any potential impacts, including within areas at risk of coastal change and flooding (CC-D1, CC-S1 and CC-S2), can be avoided or mitigated. Proposals seeking the replacement of existing electricity or telecommunication infrastructure in areas at risk of coastal change and/or flooding should comply with policies CC-D1 and CC-S2.

AC-D5 FIXED LINE TRANSMISSION INFRASTRUCTURE

1. **Proposals for new transmission lines will only be permitted where they are routed underground, unless they will conflict with policies CE-S1, CE-S2, CE-S4 and the need for the service cannot be met in any other way. In this circumstance, proposals for overhead lines may only be permitted where the visual impact is minimised by selecting the least obtrusive route and where it will not cross any moorland or open landscapes, or break the skyline.**
2. **Proposals relating to low voltage electrical cabling from renewable energy technologies (CC-S3) will only be permitted where:**
   a) **they will be routed underground;**
   b) **they will not adversely affect landscape and seascape character biodiversity, cultural heritage or recreational use of the coast; and**
   c) **there is adequate infrastructure to connect cabling nearby that does not require substantial modification or upgrading, or where any modification /upgrading to existing infrastructure is minimal and will not have any unacceptable impact.**
3. **Development proposals that include electricity or telecommunication service lines to new development will be expected to provide underground routing subject to policies CE-S1, CE-S2 and CE-S4.**

SATELLITE ANTENNAE

CONTEXT

10.69. A significant number of satellite antennae have been installed on traditional buildings throughout the National Park, and their continuing proliferation to access digital TV and more recently satellite broadband, is a cause for concern. It is recognised that some remoter broadband 'not spots' and 'slow spots' may require either fixed wireless or satellite broadband solutions for the short to medium term, until the upgrading of existing landlines to fibre-optic broadband and/or 4G mobile broadband is achieved. The optimal solution will be based on the local topography and clustering of properties.

10.70. There are restrictions on the number and size of antennae which may be installed on buildings as permitted development; and in the National Park antennae also cannot be installed on a chimney, wall or roof slope which faces onto and is visible from a road without planning consent[468]. The installation of antennae on a listed building will also require listed building consent. Where planning permission is required, the National Park Authority will seek to ensure that antennae are attached to the least obtrusive part of the building possible and are of the most appropriate design and size available (AC-D6 Satellite Antennae). Property

[468] ODPM Circular 10/2005 Permitted development rights for antennas

owners intending to install antennae under permitted development rights will be encouraged to do likewise.

FIXED WIRELESS ACCESS

10.71. Many fixed wireless access (FWA) broadband solutions may be considered as *de minimis* i.e. development not requiring planning consent – as most connections to premises will consist of a small micro wireless cell or antenna on the exterior of a building. These require line of sight to a community access point or base station which is slightly larger and likely to be similar in scale to a conventional TV aerial/satellite antenna. The scale of new technology and the speed it is being developed means that future FWA technologies are likely to be less obtrusive. The National Park Authority encourages early discussions to provide guidance on whether or not proposals are likely to require planning permission and to discuss options to minimise impacts on the National Park. Where planning permission may be required for FWA transmitter structures, then the principles set out in AC-S4 and those relating to satellite antennae (AC-D6) or telecommunications structures (AC-D4) will apply, depending on scale.

AC-D6 SATELLITE ANTENNAE

1. **The installation of satellite antennae or wireless broadband equipment will be permitted where they are sited unobtrusively and are of a scale and design which will not cause unacceptable harm, either individually or cumulatively, to the historic or architectural interest of traditional buildings, the street scene, or overall landscape or settlement character.**
2. **Installations that reduce the unacceptable harm caused by the cumulative visual impact of individual technologies will be favourably considered in relation to the tests above.**