






Schedule of Proposed Changes

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

If you have any queries or questions relating to this document please get in touch with the Policy & Community Team using the contact details below:

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1 Introduction

- 1.1 As part of the submission of the Exmoor National Park Publication Draft Local Plan, the Authority has included this list of ‘Proposed Changes’ to the Plan. These are proposed in light of:
- the representations received on the Publication Draft Local Plan (Regulation 19 consultation held during June – July 2015)¹;
 - new legislation and national policy changes (including written ministerial statements); and
 - new guidance and information arising since the Publication Draft Local Plan was approved by the Authority for consultation (24th March 2015).
- 1.2 The suggested amendments are listed in the order they appear in the Publication Draft version of the plan. For each amendment, information on the proposed change and the reason for the change is given. Where new text is proposed it has been underlined. Where text is proposed for removal it has been crossed out:
- Insertion of text
 - ~~Removal of text~~
- 1.3 Where new paragraphs and footnote references are proposed, or where they are proposed to be deleted, this will affect the subsequent numbering of paragraphs and footnote references in the final adopted version of the Local Plan. Similarly, there are references in the Plan to certain paragraphs which are likely to change if the proposed changes are subsequently incorporated into the adopted Plan.

¹ Regulation 19 of the Town and Country Planning (Local Plan) (England) Regulations 2012

2 Proposed Changes

Front Cover

No proposed changes.

Contents Page

Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
1	Contents Page	Page numbers to be updated as necessary following the implementation of proposed changes or modifications to the Plan.	Correction

Local Plan Policy Structure

Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
2	Local Plan Policy Structure	Page numbers to be updated as necessary following the implementation of proposed changes or modifications to the Plan.	Correction
3	CE-S1	LANDSCAPE <u>AND SEASCAPE</u> CHARACTER	Minor modification in relation to the publication of the draft North Devon and Exmoor Seascape Assessment.
4	HC-S3	LOCAL OCCUPANCY CRITERIA <u>FOR AFFORDABLE HOUSING</u>	To provide clarity that policy relates to criteria for affordable housing.
5	CE-S8	MINERALS SAFEGUARDING AREAS	Policy deleted in response to representation number 0043/16 – with further

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			<p>consideration of available evidence.</p> <p>ENPA position relates to a 'locally needed building stone resource'. There are no active quarries and an extensive building stone resource within the National Park. Low levels of development are unlikely to sterilise future small scale extraction of building stone. Therefore, minerals safeguarding areas are not considered to be needed.</p>
6	CE-S89	MAJOR MINERAL EXTRACTION DEVELOPMENT	<p>Policy title changed to reflect representation number 0057/02 regarding 'fracking', and the principle of minerals development in the National Park context.</p> <p>Policy numbering changed to reflect the proposed deletion of CE-S8 Minerals Safeguarding Areas.</p>

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Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
7	HC-D5	CUSTOM/SELF BUILD LOCAL NEED HOUSING IN RURAL COMMUNITIES	For clarification. Delete part of title as policy also provides for self/custom build housing in settlements.
8	HC-D6	The Change of Use of Serviced Accommodation to Housing	Policy deleted as a consequence of the removal of S106 thresholds for affordable housing from Planning Practice Guidance. Policy tests in clause 2 of HC-D1 Conversions to Dwellings in Settlements will apply (as modified in this schedule).
9	HC-D 6 <u>7</u>	Conversions to Dwellings in the Open Countryside	Numbering changed due to deletion of policy HC-D6.
10	HC-D 7 <u>8</u>	New Build Dwellings in the Open Countryside	Numbering changed due to deletion of policy HC-D6.
11	HC-D 8 <u>9</u>	Rural Workers	Numbering changed due to deletion of policy HC-D6.
12	HC-D 9 <u>10</u>	Succession Farming – Second Dwellings on Established Farms	Numbering changed due to deletion of policy HC-D6.
13	HC-D 10 <u>11</u>	Residential Caravans	Numbering changed due to deletion of policy HC-D6.
14	HC-D 11 <u>12</u>	Replacement of Rural Workers Occupancy Conditions	Numbering changed due to deletion of policy HC-D6.
15	HC-D 12 <u>13</u>	Replacement of Holiday Occupancy Conditions and Extended Family Ties	Numbering changed due to deletion of policy HC-D6.

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Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
16	HC-D134	Subdivisions of Existing Dwellings	Numbering changed due to deletion of policy HC-D6.
17	HC-D145	Residential Extensions	Numbering changed due to deletion of policy HC-D6.
18	HC-D156	Outbuildings	Numbering changed due to deletion of policy HC-D6.
19	HC-D167	Replacement Dwellings	Numbering changed due to deletion of policy HC-D6.
20	HC-D178	Local Commercial Service Provision	Numbering changed due to deletion of policy HC-D6.
21	HC-D189	Safeguarding Local Services and Community Facilities	Numbering changed due to deletion of policy HC-D6.
22	HC-D1920	Important Visual Amenity Space	Numbering changed due to deletion of policy HC-D6.

Section 1: Introduction

Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
23	Page 1, para 1.4	Exmoor National Park is an asset of national, regional and local importance as one of the few upland areas of southern England; the highest point at Dunkery Beacon rising 519m (1704 feet) above sea level. Exmoor provides a unique landscape of moorland, woodland, valleys, farmland, <u>rivers and streams</u> , and a spectacular coast shaped by both natural elements and human activity over thousands of years. Its remoteness, topography and climate have helped to maintain a large extent of well preserved, semi-natural upland landscapes and undeveloped coastline. Darkness is an important component of the <u>night time</u> tranquillity and quality of Exmoor's landscape character and in October 2011 Exmoor became the	To reflect comments made in representation numbers 0047/02 and 0059/02

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Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
		first National Park to achieve 'Dark Sky Reserve' status and the second Dark Sky Reserve in the world.	
24	Page 2, insert new paragraph after 1.5	<u>1.5A Exmoor National Park therefore plays a prominent role in the protection of the natural environment not only in the National Park area itself but in the wider context of the South West with associated ecosystem services and biodiversity benefits unconstrained by administrative boundaries. Conversely activity outside the National Park can have both beneficial and detrimental impacts on Exmoor, and the National Park is dependent on surrounding areas support in helping conserve its special qualities and features. The National Park Authority engages with neighbouring authorities on such cross-boundary strategic matters through the Duty to Co-operate.</u>	To reflect comments made in representation number 0059/02
25	Page 2, para. 1.8	Exmoor is a living, working landscape with a resident population of 10,273 people recorded in 2011; a fall of 600 from 2001 ³ . Approximately three-quarters of the population are within the West Somerset area of the National Park, and a quarter within the North Devon area. Exmoor's age profile shows the proportion of the population aged 60 years and over is around 40% with a median age of 53 compared with the national median age of 39. An ageing population is a national issue in terms of the consequences for public services including social care, an issue which is particularly exacerbated on Exmoor. The highest proportion of household type on Exmoor relates to family households the majority of which are two-person households. However, almost a third are single person households with single pensioner households constituting over half of these households, whilst other single person households account for the remainder.	Correction
26	Page 3, para. 1.10	Exmoor has one of the highest differentials between local wages and house prices in the country. The average household income in 2010 was £28,668 ⁸ the lowest for all English National Parks and 15% lower than that for the South West region as a whole. In 2014 the mean average house price ⁹ was £279,198 – 14%% higher	Correction and update to evidence.

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		than the average house price for the South West region. Evidence shows that households with an average income would not be able to afford the mean average house price (at 10 times average household income) without a significant deposit; whilst households with below average income are even further constrained. Addressing the affordable housing needs of local communities is therefore a key challenge for the Local Plan.	
27	Page 3, footnote 8	DEFRA Rural Statistics Unit (2010) National Parks: Economic Comparison <u>Cumulus Consultants Ltd (2013) Valuing England's National Parks, <i>National Parks England</i></u>	Updated reference
28	Page 3, footnote 9	ENPA (2013) 2015 Exmoor National Park Annual House Price Survey 2013 <u>2014</u> (mean average house price based on Land Registry selling price) - <i>Exmoor National Park Authority, Dulverton</i>	Updated evidence
29	Page 3, footnote 11	ENPA (2015) Exmoor National Park Authority Visitor Survey 2014	Correction
30	Page 3-4, para. 1.12	The third largest business sector is agriculture and forestry with 11.7% of all employees ¹² . Agriculture and forestry is essential for the maintenance of the characteristic landscape of the National Park relating to its mosaic of vegetation cover, the wildlife it supports, the pattern and character of Exmoor's farmsteads. Traditional hill farming and the skills and commitment of the farming community therefore provide economic benefits locally and regionally. Together with tourism, the agricultural and forestry sector and the accommodation and food service sector make up over 40% of employment for those living within the National Park illustrating that tourism and land-based enterprises are the main drivers of the local economy and an important employment resource. Two-thirds of working age people within the National Park are economically active with a high proportion (<u>26%</u>) of self-employed people, which reflects an economy dominated by small-scale businesses. Two thirds of economically inactive persons	Point of clarification.

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		are retired and there are generally low levels of unemployment despite the low levels of economic activity ¹³ .	
31	Page 4, para. 1.14	Within the National Park almost a third <u>37%</u> of the working age population works at or from home ¹⁴ and existing telecommunications infrastructure has already benefited those areas with broadband access through: businesses and people relocating to rural areas from urban areas to enjoy a better quality of life, on the basis they can work from home and access online services; and the potential for rural manufacturers and retailers to access worldwide markets ¹⁵ . Improving and adapting this infrastructure can ensure that the social and economic benefits of accessing digital technology are available across the National Park. Access to superfast broadband is being addressed across the National Park through Connecting Devon and Somerset to help deliver faster broadband to the rural areas of both counties and will help to overcome significant transport constraints experienced by rural upland areas, through increased home working, distance learning and remote access to public services.	Correction, following the release of new census evidence
32	Page 4, footnote 14	Office for National Statistics (2003) Census 2001: Key Statistics for Local Authorities. London, The Stationery Office – 31.35% of people aged 16 – 74 in employment who work mainly at or from home within Exmoor National Park (2015) Table CT0418 Origin Destination Workplace – Method of travel to work (2001 specification) by distance travelled to work – published online at www.ons.gov.uk	Update to footnote reference.
33	Page 4, para. 1.15	Due to the rural nature of the National Park and its dispersed settlements, it is not unexpected that just over under half of economically active people commute to work by car <u>with around 60% making journeys of less than 10km</u> the average commuting distance around 13km ¹⁶ . Relatively few communities have access to a year round daily bus service ¹⁷ , although there are opportunities to use demand responsive transport for parishes within the West Somerset area of the National Park and community transport schemes to help those with no or limited access to	Correction, following the release of new census evidence (footnote also updated).

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		transport access shopping or medical and other healthcare needs, including those with limited/impaired mobility. Traffic levels on Exmoor increase particularly during the main summer months when greater numbers of tourists visit the National Park. Although traffic pressures are not severe, there can be specific locations, which face congestion issues and parking problems during the busy holiday periods.	
34	Page 4, footnote 16	Office for National Statistics (2003) Census 2001: Key Statistics for Local Authorities. London, The Stationery Office – 31.35% of people aged 16 – 74 in employment who work mainly at or from home within Exmoor National Park <u>(2015) Table CT0418 Origin Destination Workplace – Method of travel to work (2001 specification) by distance travelled to work – published online at www.ons.gov.uk</u>	Update to footnote reference.
35	Page 6, para. 1.23	The Exmoor National Park Authority, as the Planning Authority for the area, has a statutory duty to prepare, monitor and review a Local Plan for the area within Exmoor National Park. The Local Plan, along with Neighbourhood Plans, form the statutory development plan for Exmoor National Park, including for minerals and waste development. This Local Plan excludes those parts of West Somerset and North Devon outside the Exmoor National Park boundary, which are covered by separate Local Plans prepared by West Somerset and North Devon Councils for their respective local planning authority areas. <u>The Exmoor National Park Local Plan 2011 – 2031 (including Minerals and Waste Policies) and the Policies Map will replace all the saved policies in the adopted Exmoor National Park Local Plan (including Minerals and Waste Policies) 2001-2011 and associated Proposals Map.</u>	To comply with Regulation 8(5) of the Town & Country Planning (Local Planning) (England) Regulations 2012
36	Page 7, para. 1.25	The Publication version of the Local Plan has benefitted from early and extensive consultation with communities and stakeholders, in accordance with the Statement of Community Involvement ²⁶ , as well as being based on available and commissioned evidence.	Update text

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37	Page 7, new paragraph after 1.30	<u>1.31 The Authority may monitor developments to ensure that they are carried out in accordance with the approved details and to ensure compliance with conditions on permissions and consents. It also investigates allegations that unauthorised developments have been carried out. A Guide to Planning Enforcement in Exmoor National Park sets out the priorities for investigation.</u>	Additional text to reflect enforcement and monitoring responsibilities.
38	Page 7, footnotes 26 - 28	²⁶ENPA (2006) Exmoor National Park Authority Statement of Community Involvement August 2006 ²⁷LUC (2015) Exmoor Local Plan: Publication Draft Version (including minerals and waste policies) – Sustainability Report, Land Use Consultants ²⁸SCC (2015) Exmoor National Park Local Plan 2011-2031 Publication Draft Habitat Regulations Assessment, Somerset County Council	References not required

Section 2: Vision, Objectives and Strategic Priorities

Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
39	Page 8, para. 2.3, Objective 1	1. Exmoor’s distinct and diverse landscapes and seascapes <u>is are maintained and enhanced, with an increased awareness of its their importance.</u> In 2030, Exmoor’s outstanding natural beauty with its mosaic of distinct and diverse landscapes and its dramatic coast and seascape, has been safeguarded and enhanced. Exmoor is still recognised as providing a sense of remoteness, wildness and tranquillity with landscapes predominantly free from and with no increase in intrusive structures and large scale development. It is renowned for its views of the night sky and lack of light pollution. ENPA and neighbouring authorities have worked together to ensure that the quality of the environment extends beyond the National Park boundary.	In response to representation number 0044/02

Section 3: General Policies

Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
40	Page 15, footnote 32	Section 62 11A (2) of the Environment Act 1995 <u>National Parks and Access to the Countryside Act</u> states that “in exercising or performing any functions in relation to, or so as to affect, land in a National Park, any relevant authority shall have regard to the [National Park purposes specified in subsection (1) of section five of this Act and, if it appears that there is a conflict between those purposes, shall attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area comprised in the National Park”	Update to Section 11A (2) of the National Parks and Access to the Countryside Act 1949
41	Page 15, footnote 33	DEFRA (2005) Guidance Note: Duties on relevant authorities to have regard to the purposes of National Parks, Areas of Outstanding Natural Beauty and the Norfolk and Suffolk Broads DEFRA, London (Paras 4-8) <u>Natural England (2011) England’s statutory landscape designations: a practical guide to your duty of regard</u>	Updated reference
42	Page 19, para. 3.24	<i>Insert footnote:</i> <u>X Maurici, J. (July 2014) Legal Opinion in the Matter of the National Planning Policy Framework and in the Matter of the South Downs National Park Authority (Landmark Chambers)</u>	Correction – add reference to the end of the paragraph 3.24.
43	Page 20, policy GP2 Major Development – clause 3.e)	e) any detrimental effect on the natural and historic environment, the landscape, and recreational opportunities, including the National Park’s special qualities, and the extent to which it could be moderated (through applying the avoidance, mitigation and compensation sequence of tests set out in clause 4 of this policy);	Grammatical correction – insert comma after ‘avoidance’.
44	Page 19, para. 3.26	The National Park Authority will therefore consider whether a proposed development is deemed to be ‘major’ on a case by case basis taking into account the potential impacts of the proposed development on: the National Park and in its local context	Change to provide clarification, in response to representation number 0044/01

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		<p><u>a) the local context – this should include taking into account the nature and sensitivity of the site, including landscape character and the size and form of any local settlements, as well as the degree of change over time in terms of the level and scale of past development; and</u></p> <p><u>b) the potential harm to the natural beauty, wildlife and cultural heritage of the National Park by reason of its scale, character and nature. The decision will not be on the basis of likely impact after that harm is reduced through mitigation. The extent to which harm could be moderated will be considered as part of the assessment process.</u></p>	
45	Page 21, para. 3.31	<p>Policy GP3 Spatial Strategy identifies where new development will be focussed, and what type of development is permitted, in principle, within the <u>named settlements identified within the settlement hierarchy</u> as Local Service Centres, <u>and Villages, and Porlock Weir</u>. The overall aim is to ensure that these communities are sustained over the longer term through appropriate development that is of a scale that is proportionate to its location and the socio-economic needs of Exmoor’s communities, within the context of the highly valued landscape of the National Park. Outside of these settlements, the area is defined as the ‘open countryside’ and includes farmsteads, isolated dwellings and hamlets.</p>	Points of clarification and change to glossary to reflect updated evidence.
46	Page 22, para. 3.34	<p>It is considered appropriate to retain a settlement hierarchy, whereby <u>NAMED SETTLEMENTS AND OPEN COUNTRYSIDE HIERARCHY</u> The named settlements are divided into categories based on their role and function, but also recognising the constraints that may impact on their ability to accommodate new development. A technical paper has been produced, which objectively assesses each settlement against a range of factors and informs the identification of each settlements <u>each settlements within each category the hierarchy</u>⁴⁵. This approach ensures that communities and their landscape setting are conserved and enhanced whilst</p>	Points of clarification.

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		providing development opportunities to help sustain their settlements over the long term.	
47	Page 22, footnote 45	ENPA (2015) Settlement Hierarchy <u>Spatial Strategy</u> : Local Plan Topic Paper – <i>Exmoor National Park Authority, Dulverton</i>	Update to reference
48	Page 22, para. 3.35	The development <u>spatial</u> strategy for Exmoor National Park, and the spatial strategy overall, is strongly affected <u>influenced</u> by the close proximity of this <u>the</u> National Park to a number of <u>surrounding</u> towns offering a range of jobs, services, retail and leisure opportunities as shown on the Key Diagram (Map 3.1). The National Park settlements exist at a rural level beneath most conventional settlement hierarchies, within which allocations would not normally be made, and provides scope only for exceptional development requiring a rural location, such as to meet local needs for affordable housing. <u>This can be illustrated by the fact that the three largest settlements within the National Park have populations below 1500.</u> The Authority considers its spatial strategy is consistent with the approach in neighbouring rural areas.	Points of clarification and correction.
49	Page 22, para. 3.37	The <u>settlement</u> categories within the hierarchy <u>spatial strategy</u> are: Local Service Centres Villages Porlock Weir Collectively these settlements are referred to in the Plan as the ‘named settlements’.	Point of clarification.
50	Page 22, para. 3.38	Local Service Centres: Dulverton, Lynton & Lynmouth and Porlock are the largest settlements within the National Park and provide the most extensive range of services in one place. Therefore, they are the most suitable locations, in principle, for new development to consolidate employment and services to help address the needs of the National Park as a whole, the surrounding area, and the local community. The influence of Dulverton in particular also extends to areas outside the National Park’s southern boundary. It is considered that the <u>local housing</u> needs of	Point of clarification.

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		the Dulverton parish outside the National Park (including Battleton) should <u>could</u> <u>appropriately</u> be met within Dulverton.	
51	Page 22, para. 3.40	Villages: The settlements identified as Villages are smaller than Local Service Centres and their area of influence is generally smaller <u>more contained</u> , but they do have a number of services and facilities and act as focal points for people living across Exmoor. Some villages and surrounding communities function collectively by sharing their facilities. Development in the 'Villages' will help maintain or enhance their communities by providing for a diverse economy, help retain and enhance key services and facilities (which are often vulnerable to closure), and address the housing needs of local communities.	Amendment to avoid repetition.
52	Page 23, para. 3.43	Development in the open countryside is considered to be exceptional in relation to the reuse of existing buildings for residential use. Buildings in the open countryside are considered to be subject to normal policies of countryside restraint and may only be converted, where they are well related to a hamlet or farmstead, to provide homes for rural workers or people in local affordable housing need, succession farm dwellings and extended family dwellings. Small rural communities that are not identified in the <u>as named</u> settlements hierarchy , but have an established, closely grouped number of dwellings within a contiguous built form, and are separate from other named settlements, plus service provision in the form of a shop, pub or community meeting place/hall, are considered to be appropriate locations for self-build opportunities to meet local affordable housing needs in accordance with HC-D5 Custom/Self Build Local Need Housing in Rural Communities (and subject to other policy considerations).	Point of clarification.
53	Page 24, para. 3.44	Development in the open countryside should be in accordance with other policies in this plan and specifically includes development that: a) is essential for the operation of rural land-based enterprises (HC-D 7 <u>8</u> New Build Dwellings in the Open Countryside, HC-D 8 <u>9</u> -Rural Workers, HC-D 9 <u>10</u>	Proposed changes to policy numbering as a result of the proposed deletion of Policy HC-D6.

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Ref	Page/ Policy/ Paragraph	Proposed Change	Justification									
		Succession Farming – Second Dwellings on Established Farms, SE-S4 (Agricultural and Forestry Development);										
54	Page 24, Table 3.1	<p>TABLE 3.1: SETTLEMENT HIERARCHY – CATEGORIES WITHIN THE SPATIAL STRATEGY</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: left;">Local Service Centres</td> <td>Dulverton Lynton & Lynmouth</td> <td>Porlock</td> </tr> <tr> <td style="text-align: left;">Villages</td> <td>Barbrook Brendon Bridgetown and Exton Brompton Regis Challacombe Cutcombe and Wheddon Cross Dunster Exford Luxborough</td> <td>Monksilver Parracombe Roadwater Simonsbath Timberscombe Winsford Withypool Wootton Courtenay</td> </tr> <tr> <td></td> <td colspan="2">Porlock Weir</td> </tr> </table>	Local Service Centres	Dulverton Lynton & Lynmouth	Porlock	Villages	Barbrook Brendon Bridgetown and Exton Brompton Regis Challacombe Cutcombe and Wheddon Cross Dunster Exford Luxborough	Monksilver Parracombe Roadwater Simonsbath Timberscombe Winsford Withypool Wootton Courtenay		Porlock Weir		Point of clarification.
Local Service Centres	Dulverton Lynton & Lynmouth	Porlock										
Villages	Barbrook Brendon Bridgetown and Exton Brompton Regis Challacombe Cutcombe and Wheddon Cross Dunster Exford Luxborough	Monksilver Parracombe Roadwater Simonsbath Timberscombe Winsford Withypool Wootton Courtenay										
	Porlock Weir											
55	Page 24, para. 3.45	Please refer to Section 10: Exmoor’s Settlements for more detailed context and inset maps relating to individual settlements within the hierarchy <u>spatial strategy</u> .	Point of clarification.									
56	Page 26, policy GP3	<p>GP3 SPATIAL STRATEGY</p> <p>1. The spatial strategy aims to ensure that communities across the National Park continue to thrive so that they are economically resilient, environmentally sustainable, socially mixed and inclusive. To facilitate</p>	<p>Points of clarification.</p> <p>3.d) Proposed changes to policy numbering as a result of the proposed deletion of Policy HC-D6.</p>									

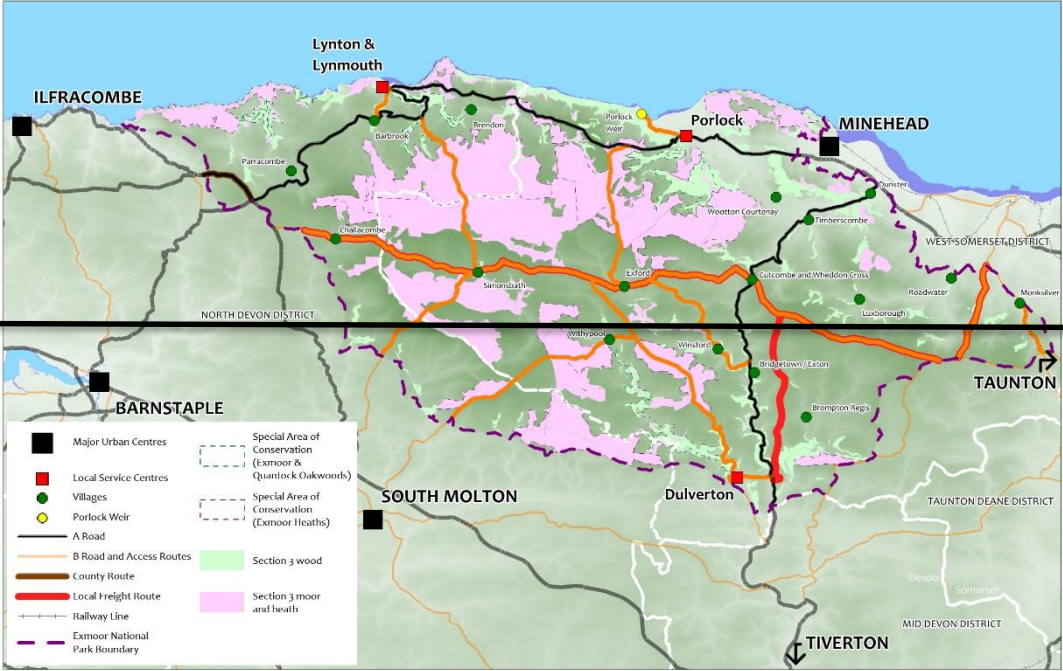
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		<p>sustainable development across the National Park, development proposals should accord with the spatial strategy.</p> <p>2. For the named settlements (listed in Table 3.1), no development boundaries will be drawn. Development proposals should ensure that the scale of development is proportionate to the settlement size and reflects the capacity of each settlement to accommodate new build development; positively responding to the surrounding landscape character, settlement form and pattern, and avoiding areas at risk of flooding.</p> <p>3. Development within the named settlements should address the following:</p> <p>a) Local Service Centres: Development should strengthen the role and function of the Local Service Centres to sustain and improve the wide range of services and facilities, to serve the needs of the settlement and surrounding communities, address locally identified needs for housing and improve employment prospects for the local area. New build development for local need affordable housing, business premises, and community services and facilities will be acceptable in principle where it is well related to existing buildings in the settlements.</p> <p>b) Villages: Development will contribute to and provide opportunities to address locally identified needs for housing and employment and sustain core services and facilities within these communities. New build development for local need affordable housing, business premises, and community services and facilities will be acceptable where it is well related to existing buildings in the settlements.</p> <p>c) Porlock Weir: Any proposals for new development will need to demonstrate that they are consistent with the principles in policy CC-S4</p>	<p>Change clause 3.d) to clause 4 as it does not relate to development within a named settlement.</p>

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		<p>Replacement Development from Coastal Change Management Areas, for the replacement of development through relocation and measures for the management of buildings/facilities at risk of being lost to coastal change. Additional new build development will only be considered to be acceptable in relation to the provision of local need affordable housing and small-scale business premises that directly addresses the needs of the community; where it can be demonstrated that this will not significantly reduce the landscape capacity for relocating development at risk of being lost to coastal change identified within the Coastal Change Management Area (CC-S3) or reduce the net habitat value available to Barbastelle bats. New build housing schemes that require cross subsidy through ‘Principal Residence housing’ or ‘specialist housing’ <u>accessible and adaptable homes</u> will not be permitted.</p> <p>4. d) Outside the named settlements the area is identified as the Open Countryside where the focus of new build development will be on improving the sustainability of rural land-based businesses (HC-D7, HC-D8, HC-D9 and SE-S4) and enabling self-build opportunities for local affordable housing in sustainable locations (HC-D5, HC-D8, HC-D9, HC-D10 and SE-S4).</p>	

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57	Page 25, Map 3.1 Key Diagram	 <p>Key Diagram</p> <p>Change to ensure the key diagram reflects changes to Map 9.1 Exmoor Route Network and layers are clear – see Appendix 1 for proposed changes to Map 3.1 Key Diagram.</p>	To reflect changes to the Exmoor Route Network (Map 9.1) and ensure the map layers are clear.
58	Page 27, para. 3.49	The re-use of traditional agricultural buildings is considered to be greenfield development, <u>but</u> <u>However</u> , it <u>is</u> recognised that such buildings <u>can add to</u> <u>are part of</u> the important resource of existing redundant or under-used buildings within the National Park that may be appropriate for a range of future uses, including local	Grammatical corrections and update to policy numbering.

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		affordable homes where they meet locational criteria (HC-D6 7 Conversions to Dwellings in the Open Countryside).	
59	Page 27, footnote 48	Monitored through Exmoor National Park Authority Annual Monitoring Reports	Change in terminology.
60	Page 27, footnote 49	Bryan, P. (2013) Exmoor National Park Landscape Sensitivity Study <u>[updated in 2015]</u> , <i>Exmoor National Park Authority, Dulverton</i>	Reflects an update to the study to include Porlock Weir.
61	Page 29, para. 3.57	Policies <u>Policy</u> HC-D1 Conversions to Dwellings in Settlements and HC-D6 Change of Use of Serviced Accommodation to Housing sets out the circumstances when, through the change of use of a building to dwellings, a financial contribution may be sought in lieu of an actual on site contribution to affordable housing. These occasions are expected to be exceptional as the National Park Authority will seek all new housing development to address a local affordable need and the needed affordable housing will therefore be provided on site. Where, consistent with Policy HC-D1 and HC-D6 , and only where, exceptionally, it can be demonstrated that on site provision of affordable housing through the change of use is not possible or appropriate, alternative off-site provision in the form of a financial contribution will be considered in lieu of the required affordable housing. Such circumstances will include where the scheme would provide more affordable homes than are needed in the parish and adjoining parishes. To enable scrutiny of the different elements and costs of the scheme, including site (building) values, so as to ensure that the affordable housing provision is maximised, an ‘open book’ approach will be required in all cases.	Proposed change to delete Policy HC-D6 as a consequence of the removal of S106 thresholds for affordable housing from Planning Practice Guidance.
62	Page 29, para. 3.58	Policy GP5 sets out the principle of requiring a contribution because for conversions of existing buildings to residential, <u>which</u> are generally more expensive to deliver than new build the contribution is likely to be greater than the equivalent new build value . The National Park Authority will seek <u>to ensure the provision of affordable housing will to be</u> local to the parish where the contribution is sought wherever possible and appropriate.	Deletion of text – no evidence to support this statement. New text to provide clarification.

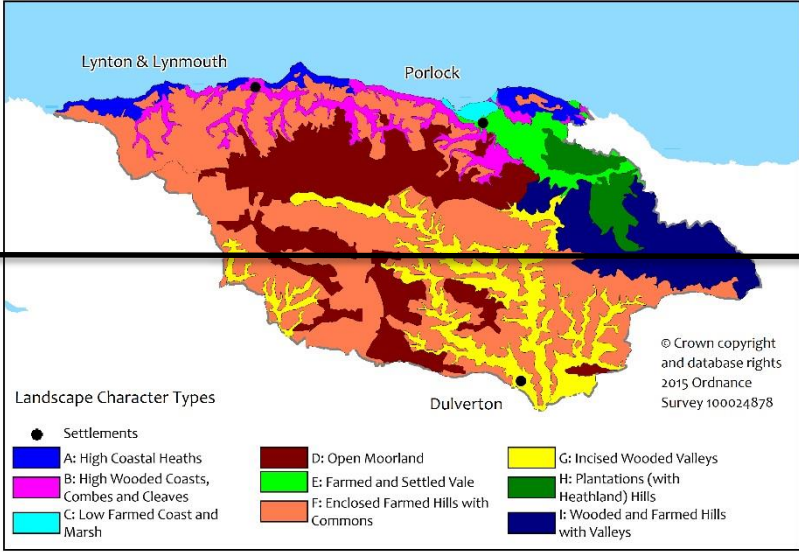
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Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
63	Page 30, para. 3.60 (first sentence)	A community infrastructure levy CIL is generally charged on development that is over 100sq metres or for new dwellings.	Text not required

Section 4: Conserving and Enhancing Exmoor

Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
64	Page 31, subheading	EXMOOR'S LANDSCAPES <u>AND SEASCAPES</u>	Change in response to the publication of the North Devon and Exmoor Seascape Character Assessment.
65	Page 32, Map 4.1	Map 4.1 Exmoor Landscape Character Types <u>and Seascape Character Areas</u>	Change in response to the publication of the North Devon and Exmoor Seascape Character Assessment. See Appendix 2.

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Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
		 <p><i>Insert new map – see Appendix 2</i> (to be moved after Seascape Character Assessment text below)</p>	
66	Page 33, insert new subheading and paragraphs after 4.9	<p><u>SEASCAPE CHARACTER ASSESSMENT</u></p> <p><u>4.9a Seascape is defined by Natural England in the terms of the ELC as: “An area of sea, coastline and land, as perceived by people, whose character results from the actions and interactions of land with sea, by natural and/or human factors” this is reinforced by the Marine Policy Statement as ‘landscapes with views of the coast or seas, and coasts and the adjacent marine environment with cultural, historical and archaeological links with each other’.</u>^{X1}</p> <p><u>4.9b The North Devon and Exmoor Seascape Assessment (SCA) covers 90 miles of coast, including the whole of the National Park coastline. The SCA will help support a number of activities including spatial planning with regard to</u></p>	Change in response to the publication of the North Devon and Exmoor Seascape Character Assessment.

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		<p><u>development at sea and on the coast, complementing published Landscape Character Assessments. There are nine seascape character areas along the Exmoor coastline, including seven coastal areas and two offshore marine areas. The SCA defines the key characteristics, special qualities and key seascape sensitivities for each area.</u>^{X2}</p> <p><i>Insert footnotes:</i></p> <p>^{X1}HM Government, <i>et al.</i> (March 2011): UK Marine Policy Statement. <i>The Stationery Office, London</i></p> <p><u>LUC (2015) The North Devon and Exmoor Seascape Character Assessment</u></p>	
67	Page 33-34, para 4.15	<p>Seascape and Heritage Coast: Seascape is defined as ‘landscapes with views of the coast or seas, and coasts and the adjacent marine environment with cultural, historical and archaeological links with each other’⁶⁰. Exmoor has some of the most scenic, unspoilt stretches of coastline in England that is also considered as part of its spectacular seascape. Many areas of high coastal heath and woodland are in as natural a condition as possible and are important areas for wildlife. The whole coastline was defined as Heritage Coast in 1991 as identified on the Policies Map. The national purposes of Heritage Coasts are compatible with the statutory purposes for National Parks and also reflect the socio-economic duty. Policies CE-S1 {Landscape and Seascape Character}, CE-D1 Protecting Exmoor’s Landscapes and Seascapes, and CC-S2 {Coastal Development} aim to ensure that development proposals retain the character of the predominantly undeveloped nature of the Heritage Coast and are consistent with national purposes.</p>	<p>Deletion of seascape text – to be moved elsewhere following the publication of the North Devon and Exmoor Seascape Character Assessment.</p> <p>Add cross-reference to policy CE-D1 in response to representations 0044/03 and 0044/04</p>
68	Page 34, para. 4.16	<p>Marine Plans will help integrate marine and land planning, contributing to vibrant coastal communities and consideration of cultural heritage, seascape and local environmental quality⁶¹. The Authority supports the formation of marine protected areas (including <u>the Bideford to Foreland Point Marine Conservation</u></p>	<p>Updated in response to the designation of the Bideford to Foreland Point MCZ.</p>

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		<p>Zones)^x and will work with the marine planning authority to ensure that Exmoor’s high quality seascape is maintained^x.</p> <p><i>Insert footnote:</i></p> <p>^x <u>The Bideford to Foreland Point Marine Conservation Zone was designated on 17 January 2016</u> <u>DEFRA (2016) Bideford to Foreland Point MCZ: factsheet</u></p>	
69	Page 34, footnotes 63 - 65	<p>⁶³ Bryan, P. (2013) Exmoor National Park Landscape Sensitivity Study 2013, Exmoor National Park Authority, Dulverton</p> <p>⁶⁴ The Landscape Sensitivity Study includes all Local Service Centres, Villages and Porlock Weir</p> <p>⁶⁵ Bryan, P. (2013) Exmoor National Park Landscape Sensitivity Study 2013 <u>[updated in 2015], Exmoor National Park Authority, Dulverton - includes all Local Service Centres, Villages and Porlock Weir</u></p>	Deletes unnecessary referencing and amends footnote 65 to explain the settlements included in the study.

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Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
70	Page 36, para. 4.27	While often development can and with care be accommodated in the landscape, other developments can potentially have unacceptable adverse impacts on landscape character and visual amenity due to their scale, massing, siting, materials, colour or arrangement and therefore could appear to be incongruous within Exmoor’s landscape. Potential impacts will vary on a case by case basis according the type of development and the sensitivity of the surrounding landscape. Some of these effects may be minimised by addressing the particular landscape or visual amenity issues raised by a proposed development. <u>Environmental Impact Assessments (EIA) should also include Landscape and Visual Impact Assessments (LVIA). However, where an EIA is not required, applications which are considered to be significant in terms of scale and/or impact should provide a LVIA. Applicants will be advised at a pre-application stage whether a LVIA is likely to be required.</u>	Change in response to representation number 0069/10 regarding terminology in policy CE-D1.
71	Page 36, para. 4.29 (first sentence)	The effects of vertical structures such as wind turbines, <u>and</u> telecommunication masts, which can have a utilitarian appearance that contrasts to rural surroundings, will depend on where they can be viewed from and who will see them.	Correction
72	Page 37, CE-S1 Landscape Character	CE-S1 – LANDSCAPE AND SEASCAPE CHARACTER 1. The high quality, diverse and distinct landscapes and seascapes of Exmoor National Park will be conserved and enhanced. 2. Development should be informed by and complement the distinctive characteristics of the: a) Landscape Ccharacter Ttypes and areas identified in the Exmoor National Park Landscape Character Assessment (LCA); and b) <u>Seascape character areas and types identified in the North Devon and Exmoor Seascape Character Assessment.</u>	Change in response to the publication of the North Devon and Exmoor Seascape Character Assessment. The listing of landscape and seascape attributes responds to representation number 0044/02 (reflects the approach in the

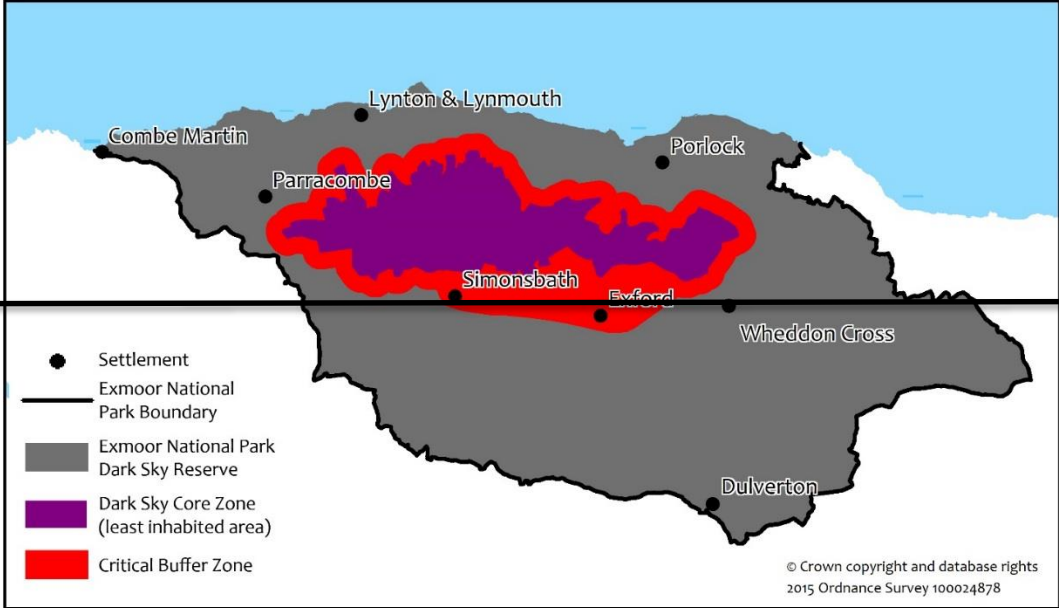
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		<p>3. Development proposals should also have regard to, and be appropriate in terms of impact with the conservation of significant landscape and seascape attributes, including:</p> <ul style="list-style-type: none"> a) <u>Section 3 Land;</u> b) <u>Heritage Coast;</u> c) <u>Landscape setting of Exmoor’s settlements;</u> d) <u>Historic field patterns and boundary features;</u> e) <u>Important trees, tree groups and orchards.</u> <p>4. Opportunities to conserve, enhance and restore important landscapes, seascapes and their landscape characteristics as identified in the LCA, including minimising existing visual detractions, will be encouraged.</p>	Draft Local Plan – November 2013).
73	Page 38, policy CE-D1	<p>CE-D1 PROTECTING EXMOOR’S LANDSCAPES AND SEASCAPES</p> <p>1. Development will be permitted where it can be demonstrated that it is compatible with the conservation and enhancement of Exmoor’s landscapes and seascapes through ensuring that:</p> <ul style="list-style-type: none"> a) the visual impact of the development in its immediate and wider setting is minimised through high quality design that reflects local landscape character with particular regard to scale, siting, materials, and colour; and b) the cumulative and/or sequential landscape and visual effects of development do not detract from the natural beauty of the National Park and the experience of tranquillity. <p>2. Within Exmoor’s Heritage Coast development should be appropriate to the coastal location and conserve the undeveloped nature of the coast consistent with Heritage Coast purposes.</p> <p>3. Landscaping schemes should reinforce local landscape or seascape character and where these are required, conditions will be attached to</p>	Amendment to clause 4 in response to representation number 0069/10 regarding terminology.

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		<p>protect important landscape characteristics and elements and whether appropriate replacement or additional landscape elements will be required.</p> <p>4. Proposals which are considered to be significant in terms of scale and/or impact should provide a professional landscape appraisal <u>Landscape and Visual Impact Assessment</u> as part of the application submission.</p>	
74	Page 39, para. 4.32	<p>The remote, open landscapes of the moorland and lack of human habitation have helped to define a ‘core dark sky area’ within the National Park as part of the on Exmoor been designated as an <u>International Dark Sky Reserve</u>, which Exmoor National Park was awarded <u>by the International Dark-sky Association (IDA)</u> in 2011. The Dark Sky Reserve status has provided an important boost to tourism, attracting visitors to experience Exmoor’s dark night sky and inspiring interest in astronomy.</p>	Points of clarification regarding the Exmoor Dark Sky Reserve terminology.
75	Page 39, para. 4.33	<p><u>An IDA International Dark Sky Reserve possesses an exceptional quality of starry nights and nocturnal environment that is specifically protected for its scientific, natural, educational, cultural, heritage and/or public enjoyment. The reserve consists of a core zone and a A-critical buffer zone around it which supports the preservation of dark sky in the core.^x this core area.</u> The critical buffer zone has also been established which <u>and</u> only includes minor <u>four relatively small</u> settlements. The identification of these areas, <u>as shown on the Policies Map</u>, has informed the Lighting Management Plan that specifies appropriate lighting methods and management within the National Park (see Map 4.2 Dark Sky Core Area and Core Buffer Zone).</p> <p><i>Insert footnote:</i> ^x http://darksky.org/idsp/reserves/</p>	Points of clarification regarding the Exmoor Dark Sky Reserve terminology.

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76	Page 39, footnote 74	<p>Bat Conservation Trust (2009) Bats and Lighting in the UK <u>Stone, E. (2014) Bats and Lighting, University of Bristol</u></p>	Updated evidence
77	Page 41, map 4.2	<p>Map 4.2 Dark Sky Reserve Core <u>Area</u> <u>Zone</u> and <u>Core</u> <u>Critical</u> Buffer Zone</p>  <p><i>Map legend to be amended to read:</i></p> <p><i>Dark Sky Reserve Core Zone</i></p> <p><i>Dark Sky Reserve Critical Buffer Zone</i></p> <p><i>Exmoor National Park</i></p>	Corrections to terminology on the Map. See Appendix 3 for the proposed Map 4.2.

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		<i>[Settlements to be shown include: Barbrook, Challacombe, Exford, Simonsbath and Wootton Courtenay]</i>	
78	Page 41, policy CE-S2	<p>CE-S2 PROTECTING EXMOOR’S DARK NIGHT SKY</p> <ol style="list-style-type: none"> 1. The tranquillity and dark sky experience of <u>the Exmoor National Park Dark Sky Reserve and the National Park as a whole</u>, and its status as an International Dark Sky Reserve, will be maintained and improved. 2. Development proposals should seek to reduce light spillage and eliminate all unnecessary forms of artificial outdoor lighting in the National Park by ensuring that: <ol style="list-style-type: none"> a) The Dark Sky <u>Reserve</u> Core Zone is protected from permanent illumination. b) External lighting within the Dark Sky <u>Reserve</u> Critical Buffer Zone is strictly controlled. c) Good lighting management and design is applied throughout the National Park to avoid unacceptable adverse impacts on: <ol style="list-style-type: none"> i) the visual character of the landscape, seascape, and historic built environment; ii) wildlife and habitats; and iii) local visual amenity and safety. 3. Development proposals that involve external lighting, outside the Dark Sky <u>Reserve</u> Core Zone, will only be permitted where it can be demonstrated that they are required for safety, security or community reasons and where the details minimise light spillage; having regard to the Lighting Management Plan guidance. 	Points of clarification regarding the Exmoor Dark Sky Reserve terminology.

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Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
79	Page 42, footnote 78	Biodiversity means the variety of life on earth, and is used here to refer to the diversity of wildlife and habitats found on Exmoor	Delete as included in the Glossary section
80	Page 44, para. 4.53 d)	d) National priority habitats and species ⁹⁴ ⁹⁴ are identified on the England Biodiversity List ⁹⁵ and those relevant to Exmoor are included within the priority habitats and species lists for Exmoor.	Correction – superscript the footnote reference number.
81	Page 46, para. 4.60	The hierarchy of <u>international, national and local</u> wildlife sites on Exmoor is shown on the Policies Map. <u>Exmoor’s Priority Habitats are not shown on the Policies Map, but many of these will be protected by existing designations; however applicants can seek advice from officers if it is considered that proposals may impact on priority habitats listed in Table 4.1.</u> In considering applications affecting the natural environment, the National Park Authority will seek to minimise impacts on biodiversity and provide net gains in biodiversity, where possible.	For clarification.
82	Page 46, para. 4.61	Applications for development should ensure that sufficient information is provided regarding the wildlife sites or species that may be affected by a proposal. Pre-application discussions can prevent delays and help ensure that planning applications are submitted with adequate information on biodiversity and geological impacts. In some cases (for example if proposals may affect a SSSI), it may be appropriate to include third parties, such as Natural England, in these discussions. Pre-application enquiries can help ascertain whether a European protected species, species identified as important or rare in a national context, or locally important on Exmoor, is present on site. Where such a species may be present, the application should be informed by an ecological survey prepared by a suitably qualified consultant to assess this. The re-use of buildings and previously developed land (GP4 The Efficient Use of Land and Buildings) in particular would require careful assessment of any existing wildlife interest. <i>[Split to create new paragraph 4.61A]</i>	For clarification in response to representation number 0059/02.

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Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
		4.61A The National Park Authority has produced an <u>Biodiversity Exmoor Wildlife Checklist and guidance</u> to assist the preparation of a planning application in considering whether a proposal is likely to affect any priority or protected species/habitats and if further surveys are necessary. Applications should show how the proposal has taken this evidence into account through its design and any mitigation or compensation proposed. The re-use of buildings and previously developed land (GP4 The Efficient Use of Land and Buildings) in particular would require careful assessment of any existing wildlife interest.	
83	Page 47, para. 4.63	The National Park Authority will work in close collaboration with Natural England, <u>the Environment Agency</u> and non-statutory conservation agencies such as the Somerset and Devon Wildlife Trusts, the RSPB, and recognised local experts as appropriate, as well as using its own specialist knowledge in assessing the likely impact of development proposals.	In response to representation number 0033/01
84	Page 48, para. 4.68	The ecological network comprises core areas, stepping stones, the matrix <u>dispersal areas</u> and sustainable use areas. <ul style="list-style-type: none"> a) Core areas are patches of priority habitat that are at least as big as the minimum area a species population needs in order to survive. b) Stepping stones are areas of priority habitat that are smaller than the minimum viable area but provide important intermediary areas of habitat, which may help to connect up core areas across the landscape. c) The matrix is <u>Dispersal areas</u> are a flexible buffer that represents where species are able to move to in the landscape, and this area can contract or be extended according to how hospitable, or permeable, a surrounding land use is. d) Sustainable use areas comprise the majority of the landscape, and this is where real advances can be made in improving the permeability of the land around core areas and stepping stones. 	Points of clarification raised by representation number 0119/01

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85	Page 48, para. 4.70	Sustainable development in the National Park should strengthen the resilience of the ecological network by avoiding direct and indirect impacts through sensitive site location and design. Sustainable development will not lead to the loss, damage, deterioration or disturbance of Core Areas, or Stepping Stones, and will generate a net gain for biodiversity by enhancing Restoration Areas and matrix habitats <u>dispersal areas</u> .	Points of clarification raised by representation number 0119/01
86	Page 49, footnote 104	Green and Blue Space Adaptation for Urban Areas and Eco Towns (GRaBS) project website www.grabs.eu.org. The GRaBS project is a network of leading pan-European organisations involved in integrating climate change adaptation into regional planning and development.	Not required
87	Page 49, footnote 105	North Devon Biosphere Team (2015) North Devon Biosphere <u>website www.northdevonbiosphere.org.uk</u>	Update reference to provide website
88	Page 50, para. 4.78	It is important that green infrastructure is planned around existing assets. Development proposals should make specific provision for green infrastructure including for wildlife that may also help to support biodiversity adaptation to climate change (CE-D2 Green Infrastructure Provision). Similarly, schemes should reflect and enhance the landscape character types across the National Park (CE-S1) and recognise the broad priorities for each landscape type and the priority areas for action set out in the Exmoor Landscape Action Plan. This will help to ensure that green infrastructure will reinforce the sense of place whilst also contributing to the delivery of sustainable land management e.g. through Higher Level Stewardship (HLS) schemes. <u>Green infrastructure can also provide opportunities to enhance the historic environment.</u>	In response to representation number 0120/03

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Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
89	Page 51, Policy CE-S3 Biodiversity and Green Infrastructure	<p>CE-S3 BIODIVERSITY AND GREEN INFRASTRUCTURE</p> <ol style="list-style-type: none"> 1. The conservation and enhancement of wildlife, habitats and sites of geological interest within the National Park will be given great weight. 2. Development delivery, management agreements and positive initiatives will conserve, restore and re-create priority habitats and conserve and increase priority species identified for Exmoor in the Exmoor Wildlife Research and Monitoring Framework (or successor publication). 3. Sites designated for their international, national or local importance, <u>priority habitats, priority or protected species, ancient woodland, and</u> or <u>veteran trees, will be protected from development likely to have direct or indirect adverse effects <u>including on their conservation objectives of designated sites, including notified features,</u> and ecological functioning of cited habitats and species.</u> 4. Regionally important geological sites (RIGS) will be safeguarded for their geological and geomorphological interest. 5. Where, in exceptional circumstances, the wider sustainability benefits of the development are considered to outweigh the harm to habitats, species or the geological interest of sites, then measures will be required to first avoid such impacts, and if they cannot be avoided, then to mitigate damage <u>harm</u> and provide appropriate compensatory measures. 6. The enhancement of biodiversity and creation of multi-functional green infrastructure networks at a variety of spatial scales, including cross-boundary connectivity to areas adjacent to the National Park, that help support ecosystem services will be encouraged. 7. Opportunities will be promoted for habitat management, restoration, expansion that strengthens the resilience of the ecological network, and 	<p>Changes to clauses 3 and 5 are points of clarification - to include priority species and habitats within the list of habitats and species where planning proposals should avoid harm.</p> <p>Amendment to clause 8 in response to representation 0119/03</p>

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		<p>enables habitats and species adapt to climate change or to mitigate the effects of climate change.</p> <p>8. Green infrastructure that incorporates measures to enhance biodiversity, including matrix dispersal areas identified within the ecological network, should be provided as an integral part of new development.</p>	
90	Page 51, para. 4.82	Policy CE-D2 Green Infrastructure Provision encourages the provision of green infrastructure as an essential component of new development ¹⁰⁷ that also incorporates benefits for biodiversity on a scale that is commensurate with the nature, scale and activity of any development proposal. <u>Green infrastructure provision should be considered at the earliest stage of preparing development proposals.</u>	In response to representation number 0069/11
91	Page 51, footnote 107	Natural England (2009): Green Infrastructure Guidance (NE176) <u>DCLG (2016) Planning Practice Guidance - Paragraph: 028 Reference ID: 8-028-20160211 - Why is green infrastructure important to delivering sustainable development?</u>	Green infrastructure guidance is updated in the PPG
92	Page 53, footnote 108	The Government’s vision for National Parks is that they are “thriving, living, working landscapes notable for their natural beauty and cultural heritage... and everyone can discover the rich variety of England’s natural and historic environment, and have the chance to value them as places for escape, adventure, enjoyment, inspiration and reflection, and a source of national pride and identity” DEFRA (2010) English National Parks and the Broads UK Government Vision and Circular.	Delete text within footnote to cite the reference only.
93	Page 55, para. 4.94	In considering applications likely to affect locally important assets, the National Park Authority will assess their significance and the desirability of their preservation. Applicants will be required to provide adequate information to	In response to representation number 0120/05

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		<p>enable the National Park Authority to assess the significance of a site or feature. Adverse impacts on <u>Harm to</u> heritage assets of local importance should be avoided and development will only be permitted where the archaeological/historic interest is capable of being preserved in situ. Where, in exceptional circumstances, an application is approved which will result in the loss (wholly or in part) of heritage assets, then developers must record and make publically available this information to advance understanding of the significance of the assets. However the ability to record evidence of the assets will not be a factor in deciding whether loss of the asset should be permitted.</p>	
94	Page 56, para. 4.99	<p>Where heritage assets are likely to be affected by development proposals, these should be identified at pre-application stage. Applications should describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the asset’s importance, in order to understand the potential impact of the proposal on their significance. The Exmoor Historic Environment Record should be consulted as a minimum to determine whether or not a heritage asset is likely to be affected and its significance; however the National Park Authority should be contacted if data is required in support of a planning application. In some circumstances, a Heritage Assessment may be required. The National Park Authority can provide further guidance and early discussion with officers is also encouraged. <u>Further advice is provided in Historic England’s good practice advice note on Managing Significance in Decision-Taking in the Historic Environment (or successor guidance).</u>^x</p> <p><i>Insert footnote:</i></p> <p>^x <u>Historic England (March 2015) Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment</u></p>	In response to representation number 0120/06. Footnote references updated.

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95	Page 59, para. 4.110	<p>Development proposals should seek to avoid adverse cumulative impacts on the setting of the heritage assets, and the erosion of its aesthetics. The National Park Authority will encourage the enhancement of heritage assets and their setting, including the repair or restoration of important features, the improvement or removal of unsightly features, and measures that better reveal the significance of the asset. <u>Further detailed guidance is set out in the Historic England good practice advice note for The Setting of Heritage Assets^x (or any replacement guidance) to provide and understanding of the potential impact of the proposal on the significance of the asset and contribution made by its setting. This will help inform any Heritage Statement that may be required when submitting a planning application.</u></p> <p><i>Insert footnote:</i></p> <p><u>^x Historic England (March 2015) Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets</u></p>	In response to representation numbers 0044/06 and 0120/07. Footnote references updated.
96	Page 56, footnote 114	Historic settlement cores are shown on the settlement inset maps – these areas are defined using the late 19th century 1st Edition Ordnance Survey Maps (1:2500 scale) and tithe maps (1838-1840)	Information proposed to be provided in the Glossary section.
97	Page 59, footnote 118	English Heritage (2014) Historic Environment Good Practice Advice Note 3: The Setting of Heritage Assets (consultation draft)	Updated in proposed change reference number 95.
98	Page 60, footnote 119	English Heritage (2014 2015) Historic Environment Good Practice Advice Note 1: The Historic Environment in Local Plans (consultation draft)	Updated reference
99	Page 62, para. 4.121	Where a traditional building is regarded as structurally <u>unsound</u> unsatisfactory for conversion, i.e. if <u>or would require</u> substantial reconstruction, extension or alteration is proposed or where the building is derelict, has no roof or is structurally unsound ; the proposal will be classified as a ‘new build’ rather than ‘conversion’ and will need to accord with the relevant policies set out in this Local	Points of clarification.

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		<p>Plan. Such proposals should still seek to retain the embodied energy in the building and the historic fabric of the structure. It may be preferable for some ruined buildings to remain <u>as ruins</u> with measures in place to stabilise their structure where they are of landscape or historic value.</p>	
100	Page 63, NEW para. 4.125a	<p><u>4.125a In terms of the conversion of buildings to a residential use, it is recognised that the floorspace of existing buildings will occasionally be larger than the required gross internal area for certain occupancy restrictions (HC-S2 A Balanced Housing Stock). Where the proposed gross internal area exceeds the policy requirement, the application should demonstrate how the following points have been considered:</u></p> <ul style="list-style-type: none"> a) <u>The desirability of converting all the existing structure in terms of achieving conservation and enhancement of the building and its setting.</u> b) <u>Whether the building can be converted to more than one dwelling unit.</u> c) <u>Whether part of the building can remain unconverted, or used as ancillary storage/garaging to ensure the habitable space does not exceed the required gross internal area.</u> <p><u>For any dwelling with a floor space restriction, but particularly local affordable dwellings, any increase in the gross internal area should be reasonable in relation to the policy requirement, as the size of the dwelling will have a substantial bearing on its value and affordability over the longer term.</u></p>	New paragraph to clarify the approach for converting an existing building to a residential use (where a floorspace restriction is required).
101	Page 64, para. 4.132	Buildings that have been constructed for less than 10 years would not normally be considered for conversion and/or change of use. In such circumstances, the degree to which the building has been used for the intended agricultural purpose will be taken account of. Where the National Park Authority has reasonable cause to believe that an applicant has, with the benefit of permitted development rights constructed a new farm building, with the intention of early conversion to another use, it will be appropriate to investigate the history of the building to establish whether it was ever used for the purpose for which it was claimed to	Correction to policy cross-reference and additional text to provide explanation of permitted development rights.

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		<p>have been built (SE-S3 Business Development in the Open CountrysideSE-S4 Agricultural and Forestry Buildings). Part 3, Class R of the General Permitted Development Order 2015 permits the change of use of agricultural buildings to a <u>flexible commercial use</u>. To meet these requirements, the buildings should be <u>solely for an agricultural use as part of an established agricultural unit on 3rd July 2012 or when it was last in use before that date (see policy SE-S3 Business Development in the Open Countryside)</u>.</p>	
102	Page 65, policy CE-S5	<p>CE-S5 PRINCIPLES FOR THE CONVERSION OR STRUCTURAL ALTERATION OF EXISTING BUILDINGS.</p> <p>1. The conversion or structural alteration of any existing building will be permitted where the proposal:</p> <ul style="list-style-type: none"> a) accords with the relevant policies in this Plan in terms of <u>sustainability and the intended use</u>; b) clearly demonstrates that the building is capable of conversion without substantial reconstruction; c) is suitable for the existing building in terms of the intended use and the intensity of that use, in relation to its capacity, structure and character without substantial alteration; where the conversion of a building relates to a change of use to a dwelling, sufficient curtilage space should be provided where the delineation of this space would not individually or cumulatively result in harm to the character of the building or its setting; and d) bat and barn owl roosts are maintained or replaced. 	In response to representation number 0043/13.

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		<p>2. In addition to clause 1, proposals for the conversion or structural alteration of traditional buildings, should also:</p> <p>a) ensure the historic fabric, and architectural interest of the building and its setting including the retention of existing traditional and historic features are conserved and enhanced; <u>and</u></p> <p>b) reflect the character and significance of the building and conserve its traditional appearance through sensitive design and the use of traditional materials, detailing and construction principles; and</p> <p>e) e <u>Conditions will be attached to remove permitted development rights granted by the General Permitted Development Order 1995 to ensure the character and appearance of traditional buildings are conserved.</u></p> <p>3. In addition to clause 1, proposals for the conversion or structural alteration of non-traditional buildings, will only be considered if traditional buildings are demonstrated to be incompatible with the intended use or no such buildings are present, and where:</p> <p>a) the building is of permanent and substantial construction; and</p> <p>b) measures to provide environmental and visual enhancement to the building and its setting are incorporated.</p>	
103	Page 67, footnotes 129 and 130	<p>¹²⁹ Bryan, P. (2013) Exmoor National Park Landscape Sensitivity Study 2013, Exmoor National Park Authority, Dulverton</p> <p>¹³⁰ The Exmoor National Park Landscape Sensitivity Study assessed the 22 named settlements in the Exmoor National Park Local Plan 2001-2011 and Porlock Weir.</p>	Delete footnote 129 and replace 130.

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		¹³⁰ <u>Bryan, P. (2013) Exmoor National Park Landscape Sensitivity Study 2013[updated in 2015], Exmoor National Park Authority, Dulverton - includes all Local Service Centres, Villages and Porlock Weir</u>	
104	Page 69, paras. 4.153 - 154	<p>4.153 The treatment of individual design elements is of critical importance to a successful overall design and should be considered once the character of an area has been assessed and key principles of scale, massing and form have been addressed. The use of materials and detailing of elements such as doors and windows will have a significant bearing on how well a new development complements its surroundings. The National Park Authority will seek to ensure that such detailing will enhance the design of the development in a style and arrangement which contributes to and strengthens the local character. The National Park Authority expects that windows and doors should be constructed of timber since this is a both a traditional and sustainable material which has the potential to be grown locally. Timber detailing (windows, doors, weatherboards etc.) when in hardwood or pre-treated, can <u>also</u> be repaired and have a long lifespan. There are examples of wooden windows on Exmoor which have lasted for well over 100 years. Metal-framed windows may be considered where it is clearly part of the local character of the area or reflects the elements of an original building to be replaced.</p> <p>4.154 Some building materials are not considered appropriate in the National Park for aesthetic and environmental reasons, meaning that they can appear incongruous when used in traditional buildings or historic settings and can erode the character and appearance of the building, local area or street scene. For example, as well as the surface finish, some uPVC window and conservatory designs can also have much thicker, unmoulded frames than timber, and the designs and detailing (applied glazing bars, joints,</p>	Points of clarification regarding materials for windows and conservatories.

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		<p><u>non-traditional forms of openings and/or wider frames for opening elements in comparison with the fixed panes) are for the most part limited in terms of being effective replacements for traditional timber designs. The Authority wishes to see the use of timber for window frames as the primary approach to fenestration. However, uPVC window frame / conservatory design has improved and some products now have a closer resemblance to the character, profile and appearance of a traditional timber window. Such Alternative materials may be considered in exceptional certain circumstances for non-traditional buildings in areas outside Conservation Areas (e.g. in the case of some minor extensions to, or replacement windows in, post-war/non-traditional buildings) where existing materials and the age, form and setting of the building may indicate such consideration). Particular attention will paid to the fenestration of the principal elevation of any building as well as any elevations which are publicly visible. It will be necessary to demonstrate that a non-timber window or conservatory would have the same high quality appearance as a traditional timber one - that the design and form has a character and appearance that complements the building: the frame and glazing bars are slim; each pane is individually glazed; the openings operate in a traditional form (including sliding sashes where that form of window is proposed); and the frame and glazing bars have appropriate mouldings. The design must be of the highest quality and the proposal will not where it can be demonstrated that there will be no adversely impact on local character or heritage assets and their settings (CE-S4), and the design is of the highest quality.</u></p>	
105	Page 70, paras. 4.158	<p>Design principles should therefore incorporate and support sustainable building methods that help reduce carbon emissions and future proof against the impacts of climate change¹³⁷. National policy advises that when setting local requirements</p>	To comply with Section 43 of the Deregulation Act 2015.

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		<p>for sustainable construction, Local Planning Authorities must be consistent with the Government’s zero carbon buildings policy and adopt nationally prescribed standards¹³⁸. <u>The Government’s subsequent approach is for local planning authorities not to set in policy any additional local standards relating to the construction, layout or performance of new dwellings^x. Energy efficiency standards to be met through Building Regulations and measures to increase standards will be kept under review. Adopting these standards not only improves the sustainability of buildings in the long term but also impacts on affordability by reducing/lowering the running costs. Where ‘allowable solutions’ are required to account for emissions that are not expected to be achieved on a site, the National Park Authority will consider opportunities for off-site carbon abatement within the National Park either where the developer can provide their own off-site abatement, through a third party or by payment into a fund¹³⁹.</u></p> <p><i>Insert footnote:</i></p> <p><u>^x HM Government (2015) Deregulation Act 2015 – section 43 Amendment of Planning and Energy Act 2008</u></p>	Footnotes amended to update references.
106	Page 70, paras. 4.159	<p>Proposed c Changes to Building Regulations will consolidate technical standards for housing¹⁴⁰ to ensure that they are high quality, accessible and sustainable. Given the low levels of development within the National Park, it is not considered to be practical to set local standards for sustainable construction. However, Proposals for new residential and non-residential development are encouraged to incorporate sustainable construction and passive design methods which not only address energy efficiency and seek to incorporate renewable energy technologies, but consider other sustainability issues such as waste, pollution, resource use, and health and well-being. Consultation has demonstrated clear support for incorporating sustainability requirements in new development, and reusing existing buildings and recycling materials where appropriate (policies GP4</p>	<p>To comply with Section 43 of the Deregulation Act 2015 (responds to representation number 0033/01).</p> <p>Last sentence moved to a new paragraph below.</p>

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		The Efficient Use of Land and Buildings and CE-S5 Principles for the Conversion and Structural Alteration of Existing Buildings).	
107	Page 70, insert new paragraph after 4.159	<p><u>4.159A The design of new development should incorporate adequate access for waste collection vehicles and storage for recycling waste. The Somerset Waste Partnership, as waste collection authority has produced guidance on the requirements for domestic properties^x, and applicants within the Somerset area of the National Park are encouraged to contact them for advice. Consultation has demonstrated clear support for incorporating sustainability requirements in new development, and reusing existing buildings and recycling materials where appropriate (policies GP4 The Efficient Use of Land and Buildings, CE-S5 Principles for the Conversion and Structural Alteration of Existing Buildings, and CC-S6 Waste Management).</u></p> <p><i>Insert footnote:</i></p> <p>^x <u>Somerset Waste Partnership (2011) Design requirements for residential properties – recycling and waste management</u></p>	Text moved from para 5.112 as more appropriate here in relation to clause 2d of CE-S6, and cross-reference back to CC-S6 Waste Management (SCC representation numbers 0046/01 and 0046/04). To reflect the updated Building Regulations Approved Document H which has been revised to include size specifications for waste storage. New reference inserted.
108	Page 70, footnotes 137, 138 and 139	<p>¹³⁷ DCLG (2012) National Planning Policy Framework (Paragraphs 94, 95). Department of Communities and Local Government</p> <p>¹³⁸ Zero Carbon Hub (2013) Zero Carbon Strategies</p> <p>The Government's aim is to achieve higher sustainable building standards through amendments to building regulations which will result in Zero Carbon Homes standard by 2016.</p> <p>¹³⁹ DCLG (2014) Next steps to zero carbon homes – Allowable Solutions – Government response and summary of responses to the consultation</p>	Associated text deleted due to the HM Government (2015) Deregulation Act 2015 – section 43 Amendment of Planning and Energy Act 2008
109	Page 71, policy CE-S6	<p>CE-S6 DESIGN AND SUSTAINABLE CONSTRUCTION PRINCIPLES</p> <p>1. Development proposals should deliver high quality sustainable designs that conserve and enhance the local identity and distinctiveness of</p>	Amendment to clause 1 responds to representation number 0120/08.

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		<p>Exmoor’s built <u>and historic</u> environment and landscape character and in doing so applicants will be expected to demonstrate the following design principles:</p> <ul style="list-style-type: none"> a) All development should positively contribute to its setting in terms of siting, massing, scale, height, orientation, density and layout. b) The materials and design elements of a building should complement the local context through the use of traditional and natural sustainable building materials. The use of locally-sourced sustainable building materials will be encouraged. c) Design should reinforce landscape character and the positive arrangement of landscape features through planting and landscaping schemes, boundary treatments, and surfacing. Existing features such as trees, hedges and stone walls should be retained particularly where they are characteristic of the streetscape and/or the local area. d) Design should have regard to health and well-being and ensure that sufficient public and/or private space is provided or available, and footpaths and cycleways are incorporated where appropriate. e) The design and layout of new development should have regard to improving safety, inclusivity and accessibility for those who live, work and visit there. f) The layout and design of new streets and associated infrastructure, required as part of development proposals, should respond to local character and the scale, and proportions of the historic street pattern. Opportunities for streets to be used as social spaces will be encouraged. g) The use and activity of the new development should not detrimentally affect the amenities of surrounding properties and occupiers including 	<p>Changes to clause 2 and insertion of clause 3 are to comply with Section 43 of the Deregulation Act 2015 (responds to representation number 0053/01).</p> <p>Change to include ‘access’ in terms of recycling waste (representation number 0046/01).</p>

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		<p style="text-align: center;">overlooking, loss of daylight, overbearing appearance, or other adverse environmental impacts.</p> <p>2. Proposals for new development should also demonstrate how they will incorporate sustainable construction methods that:</p> <p>a) promote the sustainable use of resources;</p> <p>b) reduce carbon emissions by improving or generating energy efficiencies including through renewable and low carbon technologies (CC-S5)</p> <p>c) Future proof against climate change impacts in accordance with CC-S1; and</p> <p>d) Provide adequate storage for recycling waste.</p> <p><u>2. To incorporate sustainable construction methods, proposals for new development should:</u></p> <p><u>a) promote the sustainable use of resources;</u></p> <p><u>b) provide adequate access to and storage for recycling waste; and</u></p> <p><u>c) future proof against climate change impacts, including flood risk, in accordance with CC-S1.</u></p> <p><u>3. Proposals that reduce carbon emissions by improving or generating energy efficiencies above those required by Building Regulations, including through renewable and low carbon technologies (CC-S5), will be encouraged.</u></p>	
110	Pages 75-76, para. 4.176	The Government adopts a sustainable approach to minerals development and recognises the importance of a sufficient supply of material to provide infrastructure, buildings, energy and goods that are required. The National Planning Policy Framework (NPPF) recognises that since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation. This can be achieved by adopting a hierarchical approach to minerals supply, which aims	Points of clarification regarding minerals development in the context of the National Park.

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		<p>firstly to reduce as far as practicable the quantity of material used and waste generated, then to use as much recycled and secondary material as possible, before finally securing the remainder of material needed through new primary extraction. <u>National Parks are not expected to designate Preferred Areas or Areas of Search given their statutory purposes.</u>^x</p> <p><i>[split to create a new paragraph]</i></p> <p>4.176A Minerals development is different from other forms of development because minerals can only be worked where they naturally occur. Potential conflict can therefore arise between the benefits to society that minerals bring and impacts arising from their extraction and supply.</p> <p><i>Insert footnote:</i></p> <p>^x DCLG (2014) <u>Planning Practice Guidance Paragraph: 008 Reference ID: 27-008-20140306</u></p>	
111	Page 76, para. 4.177	<p>Large scale mineral extraction is not appropriate in the National Park as it would have an adverse impact on National Park purposes. The Exmoor National Park Authority seeks to ensure sufficient levels of permitted <u>non-energy mineral reserves</u> are available from outside National Parks owing to the major impact of modern mineral extraction on the landscape, wildlife, cultural heritage, public enjoyment and the <u>health and amenity of local communities</u>. The National Park <u>Authority</u> has worked with both Devon and Somerset County Councils to ensure <u>that</u> the needs of the Exmoor National Park are taken into account in their minerals planning including that the Local Aggregate Assessments (LAAs) for Somerset and Devon includes the relevant areas of the National Park as appropriate.</p>	Points of clarification regarding minerals development within the context of the National Park.

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112	Page 76, insert two new paragraphs after 4.177	<p><u>National planning practice guidance states that in terms of planning for hydrocarbons, mineral planning authorities are expected to include petroleum licence areas on their policies map.^{X1} Only a small area of the National Park is included within a Block ST04 (a 10km by 10km area based on the national ordnance survey grid) offered under 14th Onshore Licensing Round. This area has been subject to appropriate assessment under the habitats regulations.^{X2} However, the Petroleum Act 1998 (as amended) sets out certain safeguards in relation to onshore hydraulic fracturing (fracking) to ensure that this does not take place in “other protected areas”; these areas are identified in draft regulations to include the area of National Parks at a depth of less than 1200m.^{X3} Hydraulic fracturing can only take place below 1200m.</u></p> <p><u>Policy CE-S9 Minerals Development will therefore apply to all types of mineral development, other than the small scale extraction of local building and roofing stone (CE-S7), including exploration, appraisal, extraction and processing. Apart from small-scale extraction of building and roofing stone, minerals development is not considered to be appropriate in the National Park as it would have an adverse impact on National Park purposes. There are no known mineral reserves of national importance and the lack of active mineral workings within the National Park supports this policy approach.</u></p> <p><i>Insert footnotes:</i> ^{X1} <u>DCLG (2014) Planning Practice Guidance Paragraph: 106 Reference ID: 27-106-20140306</u> ^{X2} <u>Oil & Gas Authority (2015) Habitats Regulations Assessment 14th Onshore Oil and Gas Licensing Round Appendix D completed assessment proformas – URN: 15D/401 18th August 2015</u> ^{X3} <u>The Onshore Hydraulic Fracturing (Protected Areas) Regulations 2016</u></p>	<p>Points of clarification regarding minerals development within the context of the National Park, and to reflect representation number 0057/02 regarding ‘fracking’. New references inserted.</p>

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113	Page 76, para. 4.179	<p>Small scale minerals extraction of <u>building and roofing stone</u> in the National Park would enable the provision of materials necessary for preserving traditional buildings and for maintaining and enhancing the character of settlements and the landscape character of the National Park. Consultation has indicated the need for local building material for the conservation and repair of buildings and structures of historic and cultural importance. Both national policy and policies within this plan <u>Plan</u> encourage developers to use traditional local materials in development proposals. Some materials can be salvaged and reused, while quarries just outside the National Park are another valuable source. However, these options are not always practicable, economic or suitable. Stone, for instance, is most appropriate when it is of the same composition as nearby traditional building stone. To achieve a supply of local building stone the National Park Authority will <u>policy CE-S7 provides</u> for the small-scale mineral <u>extraction of this mineral resource</u> or the reopening of disused quarries in appropriate circumstances. Consideration will need to be given on how to meet any demand for small scale extraction of building stone at, or close to, relic quarries needed for the repair of heritage assets, taking account of the need to protect designated sites (CE-S3). In accordance with government guidance it is recognised that there will be a need for a flexible approach to the potentially long duration of planning permissions reflecting the intermittent or low rate of working at many sites.</p>	Points of clarification relating to small scale extraction of building stone.
114	Page 76, para. 4.178	<p>Small scale minerals extraction in the National Park would enable the provision of materials necessary for preserving traditional buildings and for maintaining and enhancing the character of settlements and the landscape character of the National Park. Consultation has indicated the need for local building material for the conservation and repair of buildings and structures of historic and cultural importance. Both national policy and policies within this plan encourage developers to use traditional local materials in development proposals. Some materials can be salvaged and reused, while quarries just outside the National</p>	Points of clarification to reflect deleted policy text (see policy CE-S7 below).

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		<p>Park are another valuable source. However, these options are not always practicable, economic or suitable. Stone, for instance, is most appropriate when it is of the same composition as nearby traditional building stone. To achieve a supply of local building stone the National Park Authority will provide for the small-scale mineral extraction or the reopening of disused quarries in appropriate circumstances. Consideration will need to be given on how to meet any demand for small scale extraction of building stone at, or close to, relic quarries needed for the repair of heritage assets, taking account of the need to protect designated sites (CE-S3). In accordance with government guidance it is recognised that there will be a need for a flexible approach to the potentially long duration of planning permissions reflecting the intermittent or low rate of working at many sites. <u>Such mineral development will be associated with some short term noisy activities, which may otherwise be regarded as unacceptable, but are necessary to facilitate the extraction of minerals. However, mitigation and planning conditions will be used to ensure that unavoidable noise, dust and blasting vibrations are controlled.</u></p>	
115	Page 76, para. 4.179	<p>All proposals will be subject to a requirement to include a scheme for high quality restoration and aftercare of the worked land. Such schemes should seek to achieve the conservation and enhancement of the National Park including for geodiversity and biodiversity, in accordance with policy CE-S3 Biodiversity and Green Infrastructure, native woodland, historic environment and quiet enjoyment of its special qualities. Large scale <u>Other types of mineral extraction development will be regarded as major development and will therefore be considered against policies CE-S98 Major Mineral Extraction Development and GP2 Major Development. In the past the National Park Authority has received proposals for mineral exploration which generally have involved drilling. Such proposals will</u></p>	Points of clarification regarding minerals development within the context of the National Park.

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		need to be assessed against the General Policies in Section 3 and Policy CE-S7 below.	
116	Page 77, policy CE-S7	<p>CE-S7 SMALL SCALE WORKING OR RE-WORKING FOR BUILDING AND ROOFING STONE</p> <p>1. Proposals for small scale quarries or the reworking of existing small quarries to provide building or roofing stone, including for the repair of heritage assets, will be permitted where it can be clearly demonstrated that:</p> <ul style="list-style-type: none"> a) there is a demonstrable need within the National Park and any minerals won will be for use within the National Park; b) proposals would help to provide local employment and reduce ‘stone’ miles; c) there is suitable access and it is of a scale appropriate for its location in the National Park; d) it would not adversely affect the landscape character, wildlife, cultural heritage, geodiversity, special qualities, tranquillity of the National Park, or the health or amenity of local communities; e) there are no suitable sources of previously used or banked materials that are reasonably available; f) the local building material cannot be sourced sustainably from elsewhere, including from outside the National Park, and the loss of supply would result in the devaluing of the built fabric of the National Park; g) permitted operations do not have unacceptable adverse impacts on the natural and historic environment or human health, including from noise, dust, visual intrusion, traffic, tip and quarry-slope stability, 	Point of clarification/correction.

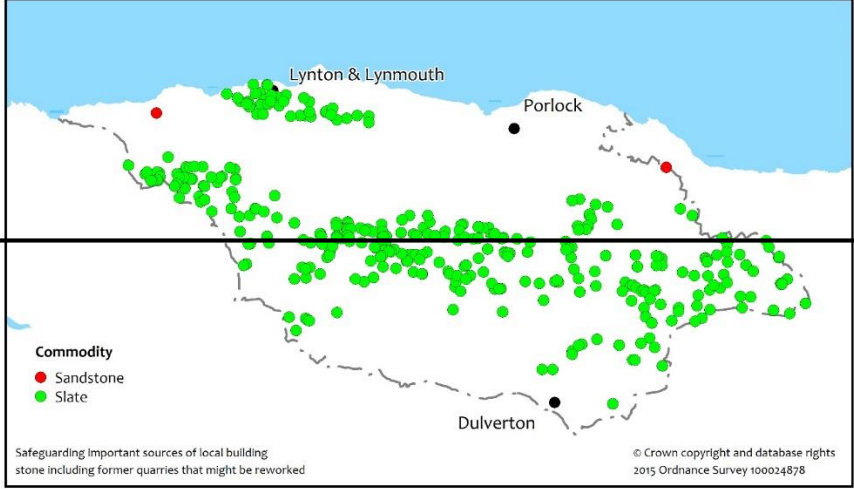
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		<p>differential settlement of quarry backfill, mining subsidence, increased flood risk, impacts on the flow and quantity of surface and groundwater and migration of contamination from the site; and take into account any cumulative effects of multiple impacts of individual sites; and</p> <p>h) recognise that some noisy short-term activities, which may otherwise be regarded as unacceptable, are unavoidable to facilitate minerals extraction. But ensure that any unavoidable noise, dust and particle emissions and any blasting vibrations are controlled, mitigated or removed at source, and establish appropriate noise limits for extraction in proximity to noise sensitive properties.</p> <p>2. Any waste materials from extraction will be re-used or recycled. A scheme for restoration and after-use of the site should be submitted with the application to ensure that it will be carried out to high environmental standards, based upon conservation and enhancement of landscape character, geodiversity, biodiversity, and the historic environment.</p> <p>3. Conditions may be applied to limit the annual extraction rate.</p>	
117	<p>Pages 77-78, para. 4.180</p> <p>To be moved to precede policy CE-S7</p>	<p>MINERALS SAFEGUARDING AREAS</p> <p>In accordance with Government policy¹⁵¹, the National Park Authority has not defined Minerals Safeguarding Areas¹⁵¹, which are known locations of specific minerals resources of local and national importance, and are identified to ensure that they are not needlessly sterilised by non-mineral development, whilst not creating a presumption that resources defined will be worked. However, there is no presumption that applications to extract the mineral resources defined in Minerals Safeguarding Areas will be granted permission. Neither does a Minerals Safeguarding Area automatically preclude other forms of development. What it does, is draw attention to the presence of important mineral resources and make</p>	<p>In response to representation number 0043/16 – with further consideration of available evidence.</p> <p>ENPA position relates to a ‘locally needed building stone resource’. There are no active quarries and an extensive building stone resource within</p>

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		<p>sure that they are adequately and effectively considered in land use planning decisions. Within the National Park the safeguarded minerals are sources of the local resource of building stone as are identified in the Building Stone Atlas of Somerset and Exmoor¹⁵² and include consist of a large number of small derelict building stone quarries. While a few of these derelict quarries may retain the appearance of a quarry, many others will have been reclaimed by vegetation or in-filled. Policy CE-S8 will be applied in all decisions where an application for non-mineral development is proposed within defined Minerals Safeguarding Areas (see Map 4.3). In the National Park, the need for minerals safeguarding is not considered to be as significant as it is in locations with higher expectations of mineral working and general development. Since new development in the National Park is extremely limited and the demand for local building stone is low, there is very little risk of sterilising the available mineral resource given the extent of the resource across the National Park.</p>	<p>the National Park. Low levels of development are unlikely to sterilise future small scale extraction of building stone. Therefore, minerals safeguarding areas are not considered to be needed.</p> <p>Footnote 151 moved to align with extant text.</p>
118	Page 78, policy CE-S8	<p>CE-S8 MINERAL SAFEGUARDING AREAS</p> <p>1. Development proposals for non-mineral development within minerals safeguarding areas will be permitted where it will not compromise the future extraction of important building stone at existing or former quarries unless:</p> <p>a) the mineral can be extracted satisfactorily prior to the development taking place; or</p> <p>b) the development is of a temporary nature, can be completed and the site restored to a condition that does not inhibit extraction within the timescale that the mineral is likely to be needed; or</p> <p>c) there is an overriding need for the development.</p>	<p>Policy deleted in response to representation number 0043/16 – with further consideration of available evidence.</p> <p>ENPA position relates to a ‘locally needed building stone resource’. There are no active quarries and an extensive building stone resource within the National Park. Low levels of development are unlikely to sterilise future small scale</p>

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			extraction of building stone. Therefore, minerals safeguarding areas are not considered to be needed.
119	Page 78, Map 4.3 Minerals Safeguarding Areas	<p>Map 4.3 Minerals Safeguarding Areas</p> 	Map deleted (see reason stated above)
120	Page 79, policy CE-S9	<p><u>CE-S89 MAJOR MINERAL EXTRACTION DEVELOPMENT</u></p> <p><u>1. Proposals for large scale mineral extraction development, other than that prescribed by policies CE-S7 and CE-D7, will not be permitted in the National Park unless in exceptional circumstances. Such proposals will be considered against the major development tests set out in policy GP2: major development, and should be and where it is demonstrated to be in the public interest before being allowed to proceed in accordance with the tests for GP2 Major Development.</u></p>	<p>To reflect representation number 0057/02 regarding ‘fracking’, and the principle of minerals development in the National Park context.</p> <p>Policy numbering to change to reflect the proposed deletion of</p>

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		<p>2. If the tests for major development are met, the development and all restoration will be subject to a planning obligation to ensure:</p> <p>a) the development should be carried out to high environmental standards and respond to the local landscape character including its natural topography;</p> <p>b) ensure that any unavoidable noise, dust and particle emissions and any blasting vibrations are controlled, mitigated or removed at source, and establish appropriate noise limits for extraction in proximity to noise sensitive properties;</p> <p>c) any waste materials from extraction <u>the mineral development</u> will be re-used or recycled <u>consistent with CC-S6 Waste</u>; and</p> <p>d) a scheme for restoration and after-use of the site should be submitted with the application to ensure it will be carried out to high environmental standards based upon conservation and enhancement of landscape character, geodiversity and biodiversity, and the historic environment.</p>	CE-S8 Minerals Safeguarding Areas.

Section 5: Responding to Climate Change and Managing Resources

Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
121	Page 82, Policy CC-S1	CC-S1 CLIMATE CHANGE MITIGATION AND ADAP <u>T</u> ATION	Correction
122	Page 83, Footnote 163	<p>Environment Agency (2009) Catchment Flood Management Plans</p> <p><u>Environment Agency (2009) Exe, North Devon, and West Somerset Catchment Flood Management Plans (updated 2012)</u></p>	Update and reference specific Catchment Flood Management Plans

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123	Page 86, Footnote 173	ENPA is designated as <u>Devon and Somerset County Councils</u> are the relevant Sustainable Drainage Systems Approving Body <u>Bodies</u> under the Floods and Water Management Act 2010 and must approve drainage systems in new developments and re-developments before construction begins.	Update reference to SuDS approving bodies in response to representation number 0033/02.
124	Page 87, policy CC-D1	<p>CC-D1 FLOOD RISK</p> <p>1. Development proposals will be permitted where they:</p> <p>a) Are consistent with the sequential test and applicants demonstrate that sites at little or no risk of flooding are developed in preference to areas at higher risk;</p> <p>b) Do not increase the risk of flooding elsewhere.</p> <p>c) Do not reduce the potential of land used for current or future flood management;</p> <p>d) Are compatible with the appropriate Catchment Flood Management Plan or Shoreline Management Plan; <u>and</u></p> <p>e) Use development to reduce the risk of flooding through location, layout and design and incorporate sustainable drainage systems to minimise surface water run-off and avoid pollution.</p> <p>2. Where appropriate, a site-specific Flood Risk Assessment should support proposals.</p> <p>3. Where, as a result of applying the sequential test, a development is approved on an exceptions basis, planning agreements or developer contributions will be sought to ensure that the development is protected from flooding to the appropriate standard throughout its lifetime. Any</p>	Amendment in response to representation 0043/19 to make clauses 1.a)-e) inclusive.

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		required additional or enhanced flood defences should not conflict with National Park purposes	
125	Page 87, para. 5.29	Exmoor has a wild, undeveloped coast, characterised by high cliffs, headlands and uninterrupted views giving a sense of tranquillity and remoteness. It also has a level of coastal vulnerability associated with it due to the impact of coastal change. The coast is important for its natural beauty, historic assets and supports a range of habitats and species. A significant proportion of the coast has a number of designations including Sites of Special Scientific Interest, Special Areas of Conservation, Heritage Coast and areas identified on the Section 3 Conservation Map. Furthermore the coast is a tourism asset; the South West Coast Path is a national trail which follows the Exmoor coast for part of its length and it makes an important contribution to the local economy. Proposals at the coast will need to be consistent with other policies in this plan which reflect these coastal interests including: GP3 Spatial Strategy, CE-S1 Landscape <u>and Seascape</u> Character, CE-S3 Biodiversity and Green Infrastructure, CE-S6 Design and Sustainable Construction Principles, CE-S4 Cultural Heritage and Historic Environment, RT-S1 Recreation and Tourism, RT-D12 Access Land and Rights of Way.	Amendment to policy title
126	Page 88, Para 5.32	Development at the coast has the potential to be visually intrusive, for example by affecting the skyline and views along the coast including undeveloped stretches (CE-S1 Landscape <u>and Seascape</u> Character). Proposals must demonstrate that there will be no adverse impact on the coastline, <u>landscape character and seascape in accordance with CE-D1 (protecting Exmoor’s Landscapes and Seascapes)</u> . Any coastal issues that may arise will need to be carefully considered including direct, indirect, cumulative, long-term and short-term impacts. Proposals must also demonstrate they are appropriate to the coastal location and that they will not affect natural coastal processes ¹⁷⁹ or result	Clarification in response to representation number 0044/05.

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		in coastal water pollution (CC-S7 Pollution) to the detriment of surrounding areas including those outside the National Park.	
127	Page 91, para 5.42	GP4 3	Correction to policy number.
128	Page 91, para 5.43	It is envisaged that a strategy for Porlock Weir and surrounding area will be produced to manage the overall sustainability of the community likely to be affected by physical changes at the coast. The strategy will set out how development at risk from coastal change can be relocated away from the CCMA. <u>As Porlock Weir is a Conservation Area with a number of listed buildings, including some within the CCMA, the strategy will consider how changes to the historic environment will be managed, in accordance with CE-S4 (Cultural Heritage and Historic Environment) and CE-D3 (Conserving Heritage Assets).</u> The relocation of development at risk to ‘safer’ areas could be achieved in a number of different ways, including the relocation further inland or to neighbouring settlements. Any proposals for adaptation and relocation at Porlock Weir should accord with this strategy.	In response to representation numbers 0120/10 and 0120/11.
129	Page 93, para. 5.46	<i>Change policy numbering:</i> HC-D1 6 ⁷ Replacement Dwellings	Proposed change to policy numbering as a result of the proposed deletion of Policy HC-D6.
130	Page 93, policy CC-S4	<i>Change policy numbering in clause 1.d):</i> HC-D1 6 ⁷	Proposed change to policy numbering as a result of the proposed deletion of Policy HC-D6.
131	Page 94, para 5.50	In some cases, in more remote areas, there may be private water supplied from sources such as springs, wells and boreholes where access to public water supply is too expensive to connect due to distance. These supplies can be sourced from the more shallow aquifers, making them more prone to water scarcity during	In response to representation number 0053/02

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		periods of extreme dry weather. It is therefore important that any proposals for new development ¹⁹¹ on a private water supply are able to demonstrate that sufficient water supplies are <u>is</u> available, and that existing water supplies and the environment are not adversely affected by the additional demand for water. <u>Local building control and environmental health teams (in the district councils) can provide further advice regarding appropriate pressure and flow to support sufficient water availability.</u>	
132	Page 94, Footnote 190	Change font size to be consistent with other footnotes.	Style correction.
133	Page 96, footnote 197	ENPA <u>Climate Action West</u> (2008) Renewable Energy Resource Assessment. <i>Exmoor National Park Authority, Dulverton</i>	Correction
134	Page 99, para 5.73	The impact of renewable energy schemes on the local ecology should be carefully assessed and where possible, result in an overall benefit for wildlife. The potential impacts depend on the type of technology and its location. Wind turbines may have direct impacts on habitats in relation to their siting and any access tracks required, and also potential impacts on species particularly birds and bats which can be struck by the moving blades. Care is needed to ensure that turbines are not located on migratory routes or on commuting routes between roosts and foraging areas for example. Hydro schemes also have potential ecological impacts through disturbance to the river bed and bank; impact on the watercourse as a habitat for fish and other aquatic creatures including through water abstraction; and impact on ecological value of other land affected by the development. <u>A number of rivers are designated or are important for migratory fish such as salmon and sea trout, and any barriers to movement such as new weirs are unlikely to be approved by the Environment Agency.</u> The demand for woodfuel for biomass could also lead to the loss of deadwood habitats if wood is cleared from the forest floor. Domestic renewable energy schemes such as PV panels also need to ensure that there is no disturbance during installation or	In response to representation number 0059/03

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		maintenance to species such as bats or barn owls which may be using the roof space. There is also emerging evidence that the reflection of polarised light from solar panels can be damaging to aquatic insects ²⁰⁵ . Such impacts will need to be judged on a case by case basis and will need to be kept under review.	
135	Page 99, footnote 204	Land Use Consultants (2013) Devon Landscape Policy Group (2013) Advice Note 2: Accommodating Wind and Solar PV Developments in Devon's Landscape: Guidance on minimising harm to the distinctive character and special qualities of Devon's landscape through sensitive siting and design, Land Use Consultants	Reference correction
136	Page 100, footnote 206	Parsons Brinckerhoff (2011) Update of UK Shadow Flicker Evidence Base <u>DCLG (2014) Planning Practice Guidance, Paragraph: 020 Reference ID: 5-020-20140306</u>	Updated reference
137	Page 102, footnote 208	HM Government (2015) The Nitrate Pollution Prevention Regulations 2015 (NPPR) (2008)	Updated reference
138	Page 103, para 5.95	Whilst the National Park Authority is supportive of renewable energy, wind turbines are, by their very nature, often intrusive in the landscape. The Exmoor National Park Landscape Character Assessment (LCA) identified intrusive development as one of the main threats to landscape character. The LCA recognises that Exmoor National Park <i>"is small in extent and as such is fragile in relation to change – not least small cumulative issues that, collectively, can have a significant impact on the landscape"</i> . The Exmoor National Park Partnership Plan 2012-17 ²⁰⁹ recognises that wind turbines can, individually and cumulatively, erode the unspoilt, uncluttered nature of the landscape and they can have a detrimental impact on tranquillity ²¹⁰ . The potential for exploiting the wind resource in Exmoor is therefore likely to be limited by the need to ensure that turbines do not detract from the statutory purposes to conserve the natural beauty, wildlife and cultural heritage of the National Park. Some landscapes, such as moor and heath, including in coastal locations, are so sensitive to intrusive	To comply with the Written Ministerial Statement on wind energy development 18 June 2015.

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		<p>development from vertical structures due to their open vistas and wild character, that it may not be acceptable to have any turbines. <u>Areas not considered to be suitable for wind energy development are Landscape Character Types A: High Coastal Heaths and D: Open Moorland as shown in Map 5.2.</u> However, in other landscape types in the National Park, it may be possible for individual small scale wind turbines that are similar in scale to existing buildings and trees, against a backdrop or suitably screened and in an appropriate colour, to be assimilated into the landscape.</p>	
139	Page 103, para 5.98	<p>In order to judge whether the potential impacts of a proposal are likely to be acceptable, applicants should consider the impacts of the wind turbine along with any required infrastructure, such as road access, on site-tracks, turbine foundations, hard standings, anemometer masts, a construction compound, electrical cabling and an electrical sub-station and control building. Some of these features are permanent and others are required only in the construction phase and as such are temporary. Applications should include any necessary supporting information regarding the assessment of impacts on landscape, wildlife, cultural heritage, historic environment and other resources as set out under the issues to be considered in proposals for renewable energy development (CC-S5) paragraphs 5.65 to 5.94. <u>Applicants will be expected to demonstrate that, following consultation, the planning impacts identified by affected local communities and 'communities of interest' such as users of the National Park have been fully addressed and therefore the proposal has their backing^x. Proposals within any areas of search allocated in a Neighbourhood Plan will be considered to have the backing of that local community.</u></p> <p><u><i>Insert footnote:</i></u></p>	To comply with the Written Ministerial Statement on wind energy development 18 June 2015.

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		^x <u>House of Commons (2015) Written Statement (HCWS42) made by Secretary of State for Communities and Local Government on 18 June 2015. Local Planning (wind energy development)</u>	
140	New: Map 5.2 Suitable Areas for Small Scale Wind Turbines and Freestanding Solar Arrays	Map showing areas unsuitable for wind energy and solar PV: Landscape Character Types A: High Coastal Heaths and D: Open Moorland <i>See Appendix 3</i>	To comply with Written Ministerial Statement on Wind Energy 18 June 2015.
141	Page 104, Policy CC-D3	CC-D3 SMALL SCALE WIND TURBINES 1. Proposals for individual wind turbines serving individual properties of groups of properties will only be permitted where they are small scale and: a) <u>Are sited within suitable areas of the National Park, excluding Landscape Character Types A: High Coastal Heaths and D: Open Moorland;</u> a)b) are appropriate in scale to the property being served, with a maximum height of 20m to rotor tip; b)c) there is no unacceptable landscape or visual impact including cumulative impacts; and any residual impacts are minimised by locating the turbine close to any associated development or features and by screening and colour of the turbine; c)d) there is no unacceptable adverse impact on tranquillity or amenity including the effects of shadow flicker and noise on nearby properties or access routes; d)e) the location does not conflict with the use of the area for recreation and access, and public safety is not compromised; and	To comply with the Written Ministerial Statement on wind energy development 18 June 2015. Informed by the Landscape Sensitivity Assessment.

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		e)f) access to the site for construction and maintenance can be provided without damage to rural roads or historic bridges and fords.	
142	Page 104, para 5.100	Small-scale freestanding solar arrays that are well screened in enclosed gardens or closely linked to existing buildings with no or minimal visual impact may be preferable to visually intrusive roof mounted panels. There may also be some circumstances where ground mounted solar arrays to serve groups of properties, community buildings, such as village halls, agricultural properties or other businesses are acceptable, where these are well screened within existing building complexes or by other landscape features such as hedgerows, walls or trees, and do not detract from any architectural or historic interest. However, freestanding arrays should be sensitively sited to avoid impacts on wildlife and land of high ecological interest. <u>Given the sensitivity of Landscape Character Types A: High Coastal Heaths and D: Open Moorland as shown in Map 5.2 these are not considered to be suitable locations for freestanding solar arrays.</u> Applicants should highlight the benefits of a ground-mounted array in comparison to a roof-mounted array in these cases. Proposals should consider the potential impacts on the issues listed for renewable energy development (CC-S5), paragraphs 5.65 to 5.94, and provide relevant information to support the application. Flood Risk implications should also be considered (CC-D1).	For consistency with proposed change reference number 141 (wind turbines). Informed by the Landscape Sensitivity Assessment.
143	Page 105	<p>CC-D4 FREESTANDING SOLAR ARRAYS</p> <p>1. Small scale freestanding solar arrays to serve the needs of individual properties, groups of properties, community buildings such as village halls, agricultural properties or other businesses will be permitted where:</p> <p>a) <u>They are sited within suitable areas of the National Park, excluding Landscape Character Types A: High Coastal Heaths and D: Open Moorland;</u></p> <p>b) they are appropriate in scale and in proportion to the size of the property they are intended to serve;</p>	<p>For consistency with proposed change reference number 141 (wind turbines). Informed by the Landscape Sensitivity Assessment.</p> <p>Change to clause 1.f) in response to representation number 0120/12.</p>

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		<p>c) they are suitably sited and screened to avoid any intrusive visual or landscape impact, and where they are clearly associated with the buildings or properties that they are intended to serve;</p> <p>d) they are sensitively sited to avoid impacts on wildlife and land of high ecological interest;</p> <p>e) the design, colour and choice of materials minimises any visual impact; and</p> <p>f) they do not detract from the <u>harm the significance and setting of listed buildings or other heritage assets, or cause damage to archaeological interests.</u></p> <p>2. Proposals for ground mounted solar arrays that are sited in isolation away from existing built forms will not be permitted.</p>	
144	Page 105, after Policy CC-D4 Freestanding Solar Arrays	<p>Insert Map 5.2 Suitable Areas for Small Scale Wind Turbines and Freestanding Solar Arrays</p> <p><i>(see Map 5.2 in Appendix 4)</i></p>	To identify the suitable areas for small-scale wind energy and solar PV development. See Appendix 4.
145	Page 106, 5.109	<p>Given the overlap of administrative boundaries, the relevant waste planning authorities of Exmoor National Park Authority and the County Councils of Somerset and Devon, have agreed to work together closely in order to continue to achieve sustainable waste management. <u>The Somerset Waste Core Strategy and Devon Waste Plan articulate this relationship with Exmoor National Park, acknowledging</u> Both County Councils agree with the National Park Authority that the provision of large scale waste facilities for disposal, processing, recovery and recycling is inappropriate on Exmoor due to the area’s designation as a National Park. <u>Large scale F</u> facilities for the disposal of domestic, industrial and commercial waste are incompatible with National Park purposes because of potential adverse impacts and because they may require the importation of waste which is deemed inappropriate in a National Park. Exmoor National Park policy will therefore</p>	Points of clarification in response to representation number 0046/03.

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		<p>presume against new waste facilities within the National Park, and no sites will be allocated. Large scale sSpecialised processing sites, such as commercial composting and recycling plants, will also be inappropriate, because of the potential adverse impacts including on the landscape and the potential for air, land and water contamination (CC-S7 Pollution). <u>Small scale re-use, recycling, and composting facilities will be permitted to serve the needs of individual local communities, but only where they are well related to named settlements (GP3) and do not include importation of waste from outside the community.</u></p>	
146	Page 107, para 5.112	<p>It is important to integrate waste management considerations into non waste developments, particularly by seeking to minimise the generation of waste in new developments, alterations and extensions, and encouraging sustainable construction methods including the use of recycled materials. Construction and demolition waste should be minimised and must be managed and re-used on site, providing that there will be no harmful impacts. However, where re-use on site may result in a risk to biodiversity, the historic environment (such as archaeology or the setting of a heritage asset), local communities or the water environment, appropriate off-site waste management or disposal will be required. <u>In these circumstances, off-site recovery or reuse will be sought in preference to off-site disposal. The design of new development should incorporate adequate storage for recycling waste (CE-S6). The Somerset Waste Partnership, as waste collection authority has produced guidance on the requirements for domestic properties²⁴⁸, and applicants within the Somerset area of the National Park are urged encouraged to contact them for advice.</u></p>	<p>In response to representation number 0046/04.</p> <p>Deleted text moved to new paragraph after 4.159 (proposed change reference 107)</p>
147	Page 107, para 5.113	<p>Construction and demolition waste arising in the Exmoor National Park area is not expected to be significant given the level of current development in the National Park. However, (small scale) <u>major^x planning applications for developments i.e. e.g. for 10 or more dwellings or buildings greater than 1000sqm, are likely to generate a considerable volume of waste compared to the majority of minor</u></p>	<p>To clarify the distinction between ‘major development’ in National Parks in relation to GP2 (NPPF para 116), and the Development Management</p>

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		<p>developments in the National Park. Policy CC-S6 therefore requires that these applications should demonstrate how waste will be minimised and sustainably managed, both through the construction phase of the development, and its subsequent operation. This should include the potential for appropriate local reuse of topsoil and other relevant materials, in order to reduce transport miles. A waste audit will be required and included as part of the planning application and should provide the following information:</p> <p><i>Insert footnote:</i> ^x <u>Major development as defined in: Statutory Instrument 2010 No.2184 The Town and Country Planning (Development Management Procedure) (England) Order 2010 Article 2</u></p>	Procedure Order definitions of ‘major development’ and in response to representation number 0058/02.
148	Page 107, footnote 218	Somerset Waste Partnership (20115) Developer Guidance <u>Design requirements for residential properties – recycling and waste management</u>	Updated reference
149	Page 108, para 5.118	Waste from sewage can harm the environment where capacity is exceeded and as a result of its transportation. To safeguarded environmental quality and the health and amenity of the National Park’s residents, sewerage capacity and sewage disposal (including the process of disposal) must be appropriately managed. Exmoor National Park will seek to continue discussions around sewage arisings and capacity with South West Water and Wessex Water as service providers. Policies CC-S6 Waste Management and CC-D5 Sewerage Capacity and Sewage Disposal seek to ensure that these impacts are avoided and to provide appropriately for new or extended sewage infrastructure.	Grammatical correction in response to representation number 0033/03.
150	Page 108, footnote 222	HMSO Government (20079) Environmental Permitting (England and Wales) (Amendment) (No. 2) Regulations <u>[as amended]</u>	Updated reference
151	Page 109, Policy CC-S6	CC-S6 Waste Management	To clarify the distinction between ‘major development’ in National Parks in relation to

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		<ol style="list-style-type: none"> 1. The National Park Authority will work with the waste collection and disposal authorities, partner organisations and local communities to promote sustainable management of waste through the waste hierarchy. 2. Large scale waste facilities, including landfill sites and specialised processing plants, will not be permitted in the National Park. 3. Construction and demolition waste should be minimised and must be managed and re-used on site where there will be no harmful impacts. Where re-use on site may result in an environmental risk to biodiversity, the historic environment (such as archaeology or setting of a heritage asset), local communities or the water environment, appropriate off-site waste management or disposal will be required. 4. Applications for all major developments (for 10 or more dwellings or buildings greater than 1000sqm as defined in the <u>Development Management Procedure Order</u>) must demonstrate how the construction and operational phases of the development will be consistent with the principles of sustainable waste management through a waste audit. 5. Waste facilities for small scale reuse, recycling, and composting will only be permitted to meet the identified needs of, and serve individual local communities, where they do not include importation of waste from outside that community. Community waste facilities should be well-related to settlements, in accordance with GP3 Spatial Strategy, to avoid the need to travel, any unacceptable adverse impact on local communities and the amenity, landscape, wildlife and cultural heritage of the National Park. 6. Small scale anaerobic digesters and waste management facilities on farms will only be permitted where they source feedstock and waste from within the National Park and/or from parishes adjoining the National Park. Farm facilities should be suitably located on the farm to 	<p>GP2 (NPPF para 116), and the Development Management Procedure Order definitions of ‘major development’.</p>

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		<p>avoid impacts on the natural and cultural environment and traffic generation. Proposals for anaerobic digesters should also accord with policy CC-S5 (low carbon and renewable energy development).</p> <p>7. Proposals relating to waste water and sewage facilities for storage and disposal should ensure that such infrastructure is appropriate in terms of its location, scale and design to avoid adverse impacts on the National Park and surrounding area (policy CC-D5).</p> <p>8. The National Park Authority will require the appropriate restoration and after-use of waste sites, through the application of appropriate conditions where necessary, based upon conservation and enhancement of landscape character, geodiversity and biodiversity, the historic environment and quiet enjoyment of the National Park.</p>	
152	Page 110, footnote 225	<p>Department of the Environment (1995) Sewage works and sewage farms: Industry Profile.</p> <p><u>DEFRA (2012) Guidance: Managing sewage sludge, slurry and silage</u></p>	Updated reference
153	Page 114, footnote 233	<p>ENPA (2011) Exmoor's Core Strategy and Development Management Policies Sustainability Appraisal Scoping Report. Exmoor National Park Authority, Dulverton</p> <p><u>ENPA (2011) Exmoor's Core Strategy and Development Management Policies Sustainability Appraisal Scoping Report. Exmoor National Park Authority, Dulverton</u></p>	Updated reference
154	Page 114, footnote 234	<p>DEFRA (200117) The Air Quality Strategy for England, Scotland, Wales, and Northern Ireland and Scotland – Volume 1</p> <p><u>DEFRA (20017) The Air Quality Strategy for England, Scotland, Wales, and Northern Ireland and Scotland – Volume 1</u></p>	Updated reference
155	Page 116, footnote 242	<p>ENPA (2014) Annual Monitoring Report 2013–2014. Exmoor National Park Authority, Dulverton</p> <p><u>Environment Agency (2016) South West river basin district river basin management plan</u></p>	Updated reference

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156	Page 117, para 5.151	<p>The proliferation of artificial lighting has led to the deterioration of the night sky in some areas. Proposals should therefore demonstrate management of light pollution is consistent with CE-S2 Protecting Exmoor’s Dark Night Sky. Proposals that are likely to result in unacceptable light pollution will not be appropriate in the National Park including from illuminated advertisements (CE-D5 Advertisements and Private Road Signs). Tranquillity which results from the experience of a combination of low noise and dark night sky is a special quality of Exmoor. The quiet enjoyment of the National Park is supported by Policy RT-S1 Recreation and Tourism. Noise is defined as ‘unwanted sound’ and its impact is a material consideration in determining planning applications. Unacceptable intrusive noise generating development is inappropriate in the National Park context and will not be permitted where it would have a significant adverse impact on Exmoor’s special qualities, health, environment, surrounding land uses, quality of life or amenity. The Adverse impacts of noise should be minimised to an acceptable level to avoid the gradual erosion of tranquillity where this may have an effect on the character of an area. Noise should not exceed the lowest observed adverse effect level above which adverse effects on health and quality of life can be detected. Further information is set out in the <u>Noise Policy Statement for England^x (or subsequent guidance)</u>. Planning obligations and conditions may be used to mitigate the effects of noise (GP5 Securing Planning benefits – Planning Obligations). It is however recognised that existing businesses should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established.</p> <p><i>Insert footnote:</i> ^x <u>Defra (2010) Noise Policy Statement for England</u></p>	For clarification in response to representation number 0047/01.

Section 6: Achieving a Thriving Community

Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
157	Section 6	General changes to ensure that the format of the footnotes in Section 6 (not listed below) are consistent with the rest of the Plan.	Consistency
158	Page 119, para. 6.1	The housing policies in this section aim to provide the framework to address the housing needs of the National Park’s local communities to ensure that the level of housing development is compatible with the conservation and enhancement of Exmoor. The focus is on addressing the needs of those people who live and work in the area, prioritising the need for affordable housing and ensuring that the National Park’s housing stock as a whole meets the needs of all sections of the local community. Providing a range of accommodation types and sizes and thereby a better mix of houses should help create more balanced, living and working communities. <u>This will be achieved through a needs led rural exceptions approach in order to maximise the ability to deliver affordable housing. Together with housing for rural workers and accessible and adaptable homes for older people, this Plan addresses the needs of Exmoor’s communities.</u>	Change to the text for clarification to summarise plan approach on how aims will be achieved.
159	Page 119, para. 6.3	The National Planning Policy Framework (NPPF) sets out a presumption in favour of “sustainable development” and indicates where development should be restricted. ²⁴⁷ Objectively assessed needs should be met unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole, or where specific policies in it indicate development should be restricted. Such policies include those within a National Park. ²⁴⁸ The Government has clarified that need alone is not the only factor to be considered. <u>Account should be taken of any constraints, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.</u> ^x Great weight should be given to conserving landscape and scenic beauty in National Parks, which have the highest	Change to the text to better reflect national policy and guidance.

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		<p>status of protection in relation to landscape and scenic beauty and Great weight should be given to conserving them and the conservation of wildlife and cultural heritage which are important considerations in National Parks. landscape and scenic beauty in.²⁴⁹ The PPG acknowledges that housing supply and affordability are issues in rural areas, recognising the role of housing in supporting the broader sustainability of rural settlements to ensure the viable use of local services and facilities to maintain thriving communities.²⁵⁰</p> <p><i>Insert footnote:</i></p> <p>^X <u>DCLG (2014) Do local planning authorities have to meet in full housing needs identified in needs assessments? Paragraph: 045 Reference ID: 3-045-20141006 [Online].</u></p>	
160	Page 119, footnote 248	<p>DCLG (2014) Press Release on the Gov.UK website: Councils must protect our precious green belt land [Online], Available: https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land [4 Oct 2014].</p> <p><u>DCLG (2014) Planning Practice Guidance: Do housing and economic needs override constraints on the use of land, such as Green Belt? Paragraph: 044 Reference ID: 3-044-20141006</u></p>	Update footnote reference.
161	Page 120, para. 6.6	<p>The approach in previous Park-wide Local Plans had been to encourage affordable housing.²⁵⁶ <u>The 1997 Local Plan restricted open market new build housing within villages to redevelopment sites. This was a response to the high level of open market in-fill housing built during the previous 5-20 years that had tended to erode the character of Exmoor's villages.</u></p> <p><i>[Split to create new paragraph 6.6A]</i></p> <p>Within the context of restraint necessary in a National Park, the 2005 Plan provided a clear focus that, exceptionally, new affordable housing to meet local</p>	Text moved from paragraph 6.101 of the Publication Draft Plan to reduce repetition, and in response to representation number 0058/02 about the length of the plan.

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		<p>need and delivered through a needs led ‘exceptions’ approach would be considered to ensure that the needs of local communities were prioritised.²⁵⁷ An important principle underpinning the approach was that the level of housing development should be compatible with the conservation and enhancement of Exmoor making maximum use of existing accommodation and buildings to reduce the need for greenfield development</p>	
162	Page 121, para. 6.8	<p>Exmoor’s population declined by 5.5% from 10,873 in 2001 to 10,273 in 2011.²⁵⁹ Comparison with England as a whole, indicates the extent to which Exmoor’s population profile is skewed towards older age groups:</p> <ul style="list-style-type: none"> a) a higher than average proportion (around 30%) is aged 65 or above - the same as West Somerset district which has the highest average age in England;²⁶⁰ b) almost twice the average proportion (35%) is aged 45 to 64;²⁶¹ c) a lower than average proportion of younger people; 25-44 year olds and under 24 year olds 20%.²⁶² d) the proportion of households with one person (<u>especially of over 65s</u>), and particularly two people, is higher than average. Nearly 20% of households are over 65s living alone. By contrast, the proportion of households with children is lower than average;²⁶³ e) Internal migration (p <u>People, mainly in older age groups, moving into the area from other parts of the UK, including the South East, London, the Midlands and East Anglia,</u>²⁶⁴ is are predicted to be the most significant reason for population change, predominantly of older age groups, resulting in a net increase in Exmoor’s population.²⁶⁵ 	<p>To clarify that the Exmoor National Park Housing Topic Paper sets out background evidence in relation to housing, To rationalise the plan by reducing figures in it and thereby reduce its length, in response to representation number 0058/02.</p>
163	Page 121, footnote 265	<p>Housing Vision (2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset, Dulverton, Exmoor National Park Authority, p78 <u>ENPA (2016) Local Plan Housing Topic Paper, Exmoor National Park Authority Dulverton.</u></p>	<p>Update footnote reference.</p>

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164	Page 121, para. 6.9	Exmoor’s housing market therefore continues to be under considerable pressure as the high quality environment of the National Park makes it an attractive place for people to retire to or own a second home.	Moved to paragraph 6.11 below to rationalise the length of the plan.
165	Page 121, para. 6.10	Evidence on the occupancy of open market houses permitted in line with planning policies from previous Local Plans showed that 30% of new properties were occupied by retired people (77% the majority of whom came from the south east region and elsewhere in the UK) and 23% as second or holiday homes. Of the fully occupied properties (i.e. excluding the 23% second/holiday homes) only one in five of the smaller one and two bedroom properties and one in 10 of all new homes went to people from National Park communities. ²⁶⁶ This is confirmed by recent <u>This appears to still be the case as housing projections for new housing and which are entirely due to result from</u> projected demand from households moving from other parts of the UK rather than locally arising needs. ²⁶⁷	To rationalise references to figures in the plan itself as they are set out in the Housing Topic Paper, and thereby reduce the length of the plan in response to representation number 0058/02 about the length of the plan
166	Page 121, para 6.11	Between 2008 and 2011, the 45 to 64 age group moved in greatest numbers to the area <u>Exmoor’s housing market therefore continues to be under considerable pressure as the high quality environment of the National Park makes it an attractive place for people, particularly those aged 45 or above, to move to or own a second home,</u> while younger people and a smaller number of older people are moved moving away. Large increases in the proportion of people aged over 65 and even greater increases in those aged 85 and above are predicted to 2035.²⁶⁸ As retired people continue to move into the area and older people become more aged, <u>Large increases in the proportion of people aged over 65 and even greater increases in those aged 85 and above are predicted to 2035²⁶⁸ and</u> the age imbalance is likely to become more acute. Continuing to address the local need for affordable housing remains an urgent task to help ensure that younger people of working age can remain in the National Park to achieve balanced and sustainable communities on Exmoor.	To increase clarity and to rationalise references to figures in the plan itself as they are set out in the Housing Topic Paper and thereby reduce the length of the plan in response to representation number 0058/02.

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167	Page 122, para. 6.12	New build dwellings account for only a small proportion of all housing in the National Park. Nearly 90% of the total stock are houses of which almost half are detached. There are fewer one and two bedroom dwellings and more modest (and more affordable) terraces and flats <u>than average</u> and a well above average proportion of larger bedroom homes.	For clarification.
168	Page 122, para. 6.13	Two thirds of Exmoor’s housing is owned, nearly half outright. About one third is rented with <u>of which approximately 16% half is</u> in the private rented sector much of it for holiday letting purposes. The proportion of the housing stock which is affordable shared ownership or social rented tenures is 14% <u>below the regional and national average.</u> ²⁷⁰ 19% <u>Nearly one in five of all housing is homes are</u> second/holiday or empty homes. ²⁷¹ This adds pressure to the limited housing stock and further exacerbates affordability issues and the ability (or otherwise) to satisfy the needs of local communities.	To increase clarity and to rationalise evidence of figures in the plan itself as they are set out in the Housing Topic Paper, and thereby reduce the length of the plan in response to representation number 0058/02.
169	Page 122, para. 6.14	The ‘Right to Buy’ of Council properties, introduced in 1981 had a significant impact on Exmoor’s affordable housing stock. ²⁷² At the time of drafting, concerted efforts on affordable housing were only just beginning to match the number of have been made to try and redress the loss of Exmoor’s affordable homes lost through Right-to-Buy.	For clarification and to rationalise the plan and thereby reduce its length in response to representation number 0058/02 about the length of the plan.
170	Page 122, para. 6.15	As a designated 'rural area', new registered housing provider (RP) properties built after April 1996 were excluded from ‘Right-to-Buy’. National changes <u>after 2010, enabled</u> RPs to sell affordable homes on the open market to help fund new schemes which can <u>could</u> be, to date, have all been outside the National Park (sales do not apply to affordable homes subject to a local needs occupancy tie). This reduces the stock of affordable housing for those in housing need. Since suitable housing sites on Exmoor are few and finite and the delivery of new schemes is complex, ENPA, working with partners, will seek the retention of affordable housing for the longer term.	For clarification and to rationalise and reduce the length of the plan in response to representation number 0058/02 about the length of the plan.

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Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
171	Page 122, para. 6.16	More recent planning policies have sought to provide for a better mix of dwellings types and sizes. between 1992 and 2000 In the 1990s, most dwellings approved and built in the National Park were larger, generally three bedroom houses. ²⁷³ From 2005, local need affordable housing completed since 2005, has tended to be more modest in size - the majority having <u>two</u> bedrooms.	For clarification and to rationalise the plan.
172	Page 122, para. 6.17	Table 6.1 shows that a A targeted approach to providing for local needs affordable housing has resulted in occupancy by households with a high proportion of children, young people and working age adults - the reverse of the age profile for those older households who tend to move to market homes in the National Park. ²⁷⁴ Provision of local need housing provides an opportunity for those with a local connection who cannot afford to buy open market housing, including younger/working age people and families, to remain living in the National Park helping to achieve a more balanced community.	To reflect the deletion of Table 6.1
173	Page 122, footnote 274	ENPA (2016) Exmoor National Park Topic Paper, <i>Exmoor National Park Authority, Dulverton, Exmoor National Park, West Somerset and North Devon Rural Housing Project (2012 & 2013) Age Range of Occupiers of Local Need Affordable Housing in Exmoor National Park (based on age provided at time of initial occupation and projected forward)</i> , Dulverton, Rural Housing Project	Update footnote reference

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Ref	Page/ Policy/ Paragraph	Proposed Change	Justification																										
174	Page 123, Table 6.1	<p>Table 6.1 Age Range of Occupants of Local Needs Affordable Homes in Exmoor National Park</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th colspan="2" style="text-align: center;">Occupancy at January 2012 and September 2013</th> </tr> <tr> <th style="text-align: center;">Age Range</th> <th style="text-align: center;">Number of Occupants</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">0-9</td> <td style="text-align: center;">47</td> </tr> <tr> <td style="text-align: center;">10-19</td> <td style="text-align: center;">20</td> </tr> <tr> <td style="text-align: center;">20-29</td> <td style="text-align: center;">56</td> </tr> <tr> <td style="text-align: center;">30-39</td> <td style="text-align: center;">34</td> </tr> <tr> <td style="text-align: center;">40-49</td> <td style="text-align: center;">15</td> </tr> <tr> <td style="text-align: center;">50-59</td> <td style="text-align: center;">8</td> </tr> <tr> <td style="text-align: center;">60-69</td> <td style="text-align: center;">8</td> </tr> <tr> <td style="text-align: center;">70-79</td> <td style="text-align: center;">2</td> </tr> <tr> <td style="text-align: center;">80+</td> <td style="text-align: center;">1</td> </tr> <tr> <td style="text-align: center;">Age not known</td> <td style="text-align: center;">4</td> </tr> <tr> <td style="text-align: center;">Total Number Housed</td> <td style="text-align: center;">195</td> </tr> </tbody> </table>	Occupancy at January 2012 and September 2013		Age Range	Number of Occupants	0-9	47	10-19	20	20-29	56	30-39	34	40-49	15	50-59	8	60-69	8	70-79	2	80+	1	Age not known	4	Total Number Housed	195	To rationalise evidence of figures in the plan itself as they are set out in the Housing Topic Paper, and thereby reduce the length of the plan in response to representation number 0058/02.
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175	Page 123, para. 6.18	<p><u>Income, House Prices, Rental Levels and Affordability</u></p> <p>Housing 'affordability' has to be considered at a local level in the context of local incomes and house prices. Average gross household income within the National Park is between £28,000 and £29,000.²⁷⁵ Many people however, are on lower incomes and in the area of the National Park within West Somerset, 45% of households are dependent on incomes of <u>around £20,000</u> or less (with lower quartile incomes at <u>averaging £16,000</u>).²⁷⁶ This is substantially lower than the national average. As well as many seasonal and part-time jobs, a high proportion - over a quarter - of West Somerset's work-force is self-employed with <u>lower</u> average earnings 14% lower than employee-employment equivalents.²⁷⁷</p>	For clarification and to reduce the need for separate sub headings for paragraphs 6.18 and 6.19.																										

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		Comparing rental levels and house prices with income levels and the availability of mortgages within the National Park demonstrates the magnitude of the problem.	
176	Page 123, footnote 275	DEFRA Rural Statistics Unit (2010) National Parks: Economic Comparison <u>Cumulus Consultants Ltd (2013) Valuing England's National Parks, <i>National Parks England</i></u>	Updated reference
177	Page 123, para. 6.19	Between 1998 and 2012 average asking prices rose by over 300% in the National Park due to very high external market demand. ²⁷⁸ In 2013 2014, the average Exmoor asking house prices was £325,000 – 25% were significantly higher than the South West and 16% higher than England and Wales. ²⁷⁹ <u>The disparity between household incomes and house prices means there is an 'affordability gap' with the ratio of average house price to average household income being 1410:1. The price of smaller properties was also high. The average asking price of lower quartile (or the bottom 25%) of houses was £180,000 and the ratio of lower quartile house price to lower quartile income was 11:1.</u> ²⁸⁰ Consequently, the majority of properties is well beyond the means of many local people in housing need, especially first-time buyers and families needing larger accommodation.	For clarification, to update and rationalise evidence including of figures in the plan itself as they are set out in the Housing Topic Paper and thereby to reduce the length of the plan in response to representation number 0058/02.
178	Page 123, footnote 279	ENPA (2013) Exmoor National Park Annual House Price Survey, Dulverton. ENPA: (median average house price) <u>Ibid (mean average house price)</u>	Update to footnote reference.
179	Page 124, para. 6.20	If Based on 25% of gross income being spent on rent is taken as a proxy for as affordability, private market rents in Exmoor were beyond the reach of many households on an average income. This was particularly the case for those families requiring a larger (3-4 bed) property.	For clarification.
180	Page 124, para. 6.21	Social rental levels (formerly set by the HCA and sometimes known as ' <u>formula rents</u> ') were affordable to households on average income but only one and two bed housing was affordable for those households on lower quartile incomes. Larger homes were borderline affordable or unaffordable.	To update the Plan.

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181	Page 124, para. 6.22	National changes to offset reductions in public housing grants and the introduction of ‘Affordable Rents’, pegged at up to 80% of local open market rents, have led, where ‘ A ffordable R ents’ have been applied, to higher (and less affordable) rents on Exmoor than social (or ‘formula’) rent levels. On average incomes, 80% rents were <u>only</u> affordable for up to three bedroom housing only . All properties (including one bed dwellings) were at the higher end or above what was considered affordable for those on lower quartile incomes.	For clarification and to update the Plan.
182	Page 124, para. 6.23	Severe physical constraints, such as flood risk and topography and the sensitivity of Exmoor’s landscape, affect the capacity of Exmoor’s settlements to absorb more housing development. The Landscape Sensitivity Study for Exmoor National Park sets out the landscape capacity for new build housing on greenfield sites in each settlement named in the adopted Local Plan.²⁸⁴ Within the context that land in a National Park is recognised as being nationally important, <u>the Exmoor National Park Landscape Sensitivity Study assessed</u> greenfield land in and around existing named settlements was assessed in terms of its landscape sensitivity to, <u>and capacity for, new build housing.²⁸⁴ It assessed demonstrated that the limited total landscape capacity of all settlements named in the 2005 Local Plan over the longer term (and beyond the period of the Local Plan). was 333 units</u>	To increase clarity, to rationalise evidence of figures in the plan itself, as they are set out in the Housing Topic Paper, and reduce the length of the plan in response to representation number 0058/02. Footnote 284 moved to align with inserted text.
183	Page 124, footnote 284	Bryan, P. (2013) Exmoor National Park Landscape Sensitivity Study 2013, <u>[updated 2015] Dulverton, Exmoor National Park Authority, Dulverton</u>	
184	Page 124, para. 6.24	The Exmoor National Park Strategic Housing + Land Availability Assessment (SHLAA) examined the potential of land to deliver future housing development to address identified need over the plan period. It was based on realistic assumptions about the availability and suitability of land taking account of constraints. The potential for the re-use of existing buildings was also examined and those considered suitable were included as a means of delivering housing and to reduce the need for greenfield land. The SHLAA supply within the National Park was calculated as 249 units	Grammatical correction and to rationalise evidence of figures in the plan itself, as they are set out in the Housing Topic Paper.

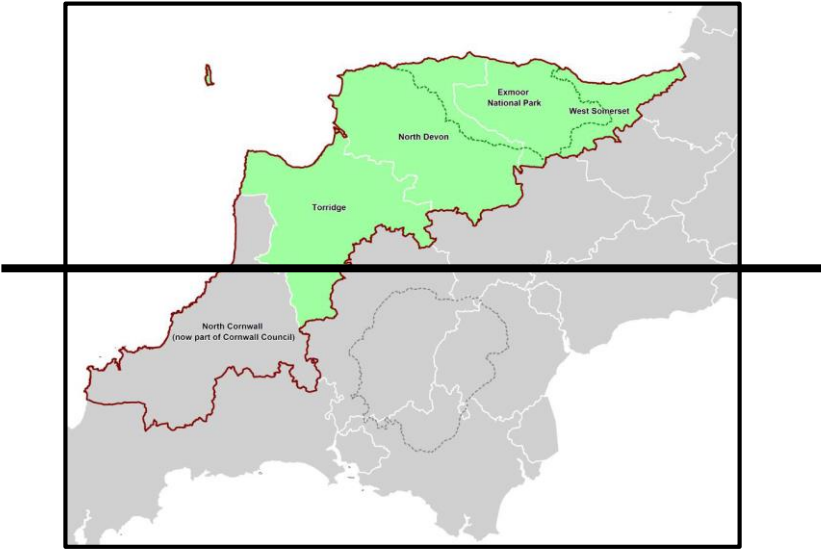
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Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
185	Page 124, para. 6.25	There is a low number of brownfield sites suitable for new housing within the National Park. If the few remaining suitable housing sites and traditional buildings within Exmoor’s settlements are not used to provide local needs housing then it will put pressure on other sites outside settlements that have the potential to harm the landscape. The approach of providing housing to meet local needs through the Local Plan has to be based upon the 'exceptions' approach - to grant planning permission where general open market housing would not be permitted. Sites will not be allocated, <u>including because of the need to maintain land at ‘rural exceptions site’ values to maximise delivery of local needs affordable housing.</u> Instead they sites will be released on an individual basis, based upon the needs evidence. provided by the applicant/developer.	For clarity.
186	Page 125, subheadings	HOUSING NEED OBJECTIVELY ASSESSED HOUSING NEED (OAHN)	For clarification.
187	Page 125, para. 6.26	In line with national policy, the need (both affordable need and market demand) for housing in the Northern Peninsula Housing Market Area (<u>HMA</u>) has been objectively assessed and updated. The 2008 Northern Peninsula Strategic Housing Market Assessment (<u>SHMA</u>) was prepared in partnership with the other local authorities within the same housing market area HMA (North Cornwall, Torridge, North Devon West Somerset and Exmoor National Park) ²⁸⁶ <u>and updates were subsequently completed</u> To take account of the changes in economic and market conditions ²⁸⁶ <u>since the preparation of the original assessment, separate updates were completed between 2012 and 2014.</u> ²⁸⁷ In early 2015, a joint Northern Peninsula Strategic Housing Market Area (SHMA) Update was carried out to provide evidence for Torridge, North Devon, West Somerset and the National Park. ²⁸⁸ Together with a Cornwall Council assessment of the requirement and future delivery of housing in the former North Cornwall district, it provides evidence on future population-led growth <u>A joint review of the implications of the</u>	To update and reduce the length and complexity of the text - more detail is set out in the Housing Topic Paper – and in response to representation number 0058/02 about the length of the plan. Updating to refer to review of implications of the 2012 household projections in response to representation 0051/04 Footnote 286 moved to align with extant text.

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		<p><u>2012 household projections was completed in 2015,^x it provides evidence to underpin planning for the delivery of housing in the Housing Market Area over the plan period.</u></p> <p><i>Insert footnote:</i> ^x <u>Housing Vision (December 2015) Northern Peninsula Housing Market Area Strategic Housing Market Assessment (SHMA): The Implications of the 2012-based Household Projections: Final Report.</u></p>	
188	Page 125, para. 6.27	<p>The Government has clarified that need alone is not the only factor to be considered. Objectively assessed need should not be met if adverse impacts would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF, or where specific policies indicate development should be restricted, such as within a National Park.²⁸⁹ Great weight should be given to conserving landscape and scenic beauty in National Parks, which have the highest status of protection in relation to landscape and scenic beauty.²⁹⁰ The NPPF refers to the National Parks and the Broads Vision and Circular as providing further guidance.²⁹¹ National Parks are not suitable locations for unrestricted housing and general housing targets are not provided.²⁹²</p>	Deleted to avoid repetition of paragraph 6.3 and in response to representation number 0058/02.
189	Page 125, footnotes 289, 290, 291 and 292	<p>²⁸⁹ DCLG (2012) National Planning Policy Framework, London: Department of Communities and Local Government, footnote 9 of paras. 14 & 47. DCLG (2014) Press Release: Councils must protect our precious green belt land [Online] Available: https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land () DCLG (2012) National Planning Policy Framework, London: Department of Communities and Local Government, paragraph 54 ²⁹⁰ Ibid. Paragraph 115. ²⁹¹ DCLG (2012) National Planning Policy Framework, London: Department of Communities and Local Government, para. 115 footnote 25. DCLG (2014) Planning Policy Guidance: How should local authorities support sustainable rural</p>	Footnotes deleted due to the proposed deletion of associated text in para. 6.27.

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		<p>communities? (paragraph 001, Reference ID: 50-001-20140306) [Online] http://planningguidance.planningportal.gov.uk/blog/guidance/rural-housing/how-should-local-authorities-support-sustainable-rural-communities/;</p> <p>and</p> <p>²⁹² DEFRA (2010) English National Parks and the Broads UK Government Vision and Circular, London: Department for Environment, Food and Rural Affairs, para. 78.</p>	
190	Page 126, Map 6.1	<p>Map 6.1 Exmoor National Park within the Northern Peninsula Housing Market Area <i>(Map courtesy of Torrridge District Council)</i></p> 	Delete map as included in Housing Topic Paper.
191	Page 126, para. 6.28	<p><u>The Exmoor National Park Housing Topic Paper sets out how the objectively assessed housing need (OAHN) for Exmoor National Park of 718 units 2011-31 has been calculated.</u> ^X The unadjusted housing figure identified by the Joint SHMA</p>	To clarify that the Housing Topic Paper explains how the OAHN has been calculated and to update the Plan in response

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		<p>Update for Exmoor National Park based on the household projections 2011-31 is 537 units.²⁹³</p> <p><i>Insert footnote:</i></p> <p>^x <u>ENPA (2016) Exmoor National Park Local Plan Housing Topic Paper</u></p>	to representations 0063/01 and 0051/04.
192	Page 126, footnote 293	Housing Vision (January 2015) Northern Peninsula Housing Market Area Strategic Housing Market Assessment (SHMA) Update: Final Report.	Footnote deleted due to the proposed deletion of associated text in para. 6.28
193	Page 126, para. 6.29	<p>The figure for the area of North Devon within the National Park is 205 (when adjusted). This includes both affordable and market housing and does not take into account housing completions since 2011/12.²⁹⁴ In considering the evidence for the area, and co-operating with North Devon Council, tThere is agreement that the delivery of the 205 units of housing <u>identified for the part of North Devon in Exmoor National Park</u>, a proportion of which will be affordable, identified for that part of North Devon in Exmoor National Park will be <u>included</u> in the North Devon and Torridge Local Plan <u>housing requirement</u> to be met in the North Devon area outside the National Park. North Devon Council has taken the view that the additional housing should be located close to and accessible to the National Park's boundaries, and that community aspirations for growth identified by Ilfracombe, South Molton and local centres complement this objective.</p>	To rationalise housing evidence in the plan itself, as it is set out in the Housing Topic Paper, and in response to representation number 0058/02 about the length of the plan.
194	Page 126, footnote 294	ibid	Footnote deleted due to the proposed deletion of associated text in para. 6.29
195	Page 126, para. 6.30 Replace wording	Taking into account the backlog of affordable housing, there is projected to be an objectively assessed need (OAN) for 306 affordable units in the area of the National Park in West Somerset over the plan period.	For clarification and to reduce repetition in response to representation number 0058/02 about the length of the plan.

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		<p><u>The remaining area of the National Park is within the West Somerset housing authority area. In this plan, the focus is on the delivery of affordable housing for which it is projected that there will be a need for 336 units over the plan period.^x</u></p> <p><u><i>Insert footnote:</i></u> ^x <u>Housing Vision (December 2015) Northern Peninsula Housing Market Area, Strategic Housing Market Assessment (SHMA): The Implications of the 2012-Based Household Projections, Final Report</u></p>	
196	Page 126 Insert new sub-headings and paragraphs	<p><u>STRATEGIC POLICY HC-S1</u></p> <p><u>6.30A National policy is that if adverse impacts would outweigh the benefits when assessed against the policies in the NPPF or where specific policies indicate development should be restricted, such as within a National Park, that objectively assessed housing need should not be met.^{x1}The National Parks and the Broads Vision and Circular states that National Parks are not suitable locations for unrestricted housing and general housing targets are not provided. ^{x2}</u></p> <p><u>6.30B ENPA has taken account of statutory National Park purposes, the local socio-economic duty to National Park communities and constraints which indicate that development should be restricted and that the ability to meet the full need (demand) for housing over the plan period is constrained.</u></p> <p><u>Insert footnotes:</u> ^{x1} DCLG (2012) National Planning Policy Framework, London: Department of Communities and Local Government, footnote 9 of paras. 14 & 47. DCLG (2014) Press Release: Councils must protect our precious green belt land [Online] Available: https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land ()- DCLG (2012) National Planning Policy Framework, London: Department of Communities and Local Government, paragraph 54</p>	For clarification.

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		<p>^{x2} DCLG (2012) National Planning Policy Framework, London: Department of Communities and Local Government, para. 115 footnote 25. DCLG (2014) Planning Policy Guidance: How should local authorities support sustainable rural communities? (paragraph 001, Reference ID: 50-001-20140306) [Online]; and DCLG (2012) National Planning Policy Framework, London: Department of Communities and Local Government, para. 115 footnote 25. DCLG (2014) Planning Policy Guidance: How should local authorities support sustainable rural communities? (paragraph 001, Reference ID: 50-001-20140306) [Online]</p>	
197	Page 126, para. 6.31	<p>The estimate of local affordable housing need in the National Park 2011-2031 is 306 units. This does not take into account affordable housing completions since 2011. The approach to housing delivery in this Plan is therefore to provide positively for housing, working with estimates of housing provision through a rural exceptions approach and without a target, to deliver locally needed affordable homes housing up to the point at which the National Park would be harmed. The estimate of affordable housing units needed in the National Park 2011-2031 for this Local Plan is 336 units.</p> <p><i>[split to create new paragraph 6.31A]</i></p> <p>6.31A This approach is appropriate in a remote rural area, given the small size of Exmoor’s settlements, landscape sensitivity and capacity, <u>and</u> SHLAA supply and is consistent with National Park purposes, national policy and guidance and the duty to local communities <u>and national policy and guidance.</u></p>	For clarification and to update the plan and estimate of affordable need based on updated evidence on the 2012 household projections and consistent with the PPG.
198	Page 127, para. 6.32	<p>Feedback from the community ‘Your Future Exmoor’ events demonstrated widespread support for housing that is affordable to local people.²⁹⁶ The National Park Authority, through being based on Exmoor, <u>and</u> working at a local level and in partnership with others (including the District Housing Authorities) has a good understanding of the needs of the area and, from 2002, hosted the Rural Housing Project (RHP).</p>	For clarification and to reduce the length of the plan.

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199	Page 127, para. 6.33	<p>Housing Authority waiting lists have been replaced with a housing register which may not record local connection or may define it differently from planning policies. Households bid for affordable housing as it becomes available. As with the former waiting lists, there remains an issue with rural households registering on the system.</p> <p><i>[split to create new paragraph 6.33A]</i></p> <p>6.33A This was an important reason for the setting up of the RHP. It is therefore <u>important that actual need is assessed. The RHP it carried approach, carrying out</u> rural parish housing need surveys across West Somerset, North Devon, and Exmoor National Park and provided more accurate information <u>on</u> affordable need. and it consistently revealed a local, albeit often small, need, in some cases fewer than three households, for affordable housing in settlements as well as detailed information on size, type and tenure.</p>	To simplify the wording for clarification and correct a grammatical error.
200	Page 127, para. 6.34	<p>Surveys carried out between 2002 and 2008, identified 262 households in affordable need in the parishes within and split by the National Park boundary while a Park wide ‘snapshot’ survey to estimate housing need, identified 127 households with a local connection.²⁹⁸ A ‘snapshot’ Based on analysis of the needs data and affordable housing completions at September 2013, provided the an estimate of housing need of 90 units for the whole of Exmoor National Park at September 2013 was 90 units.²⁹⁹ The reduction in the number of households assessed as being in need indicates, despite newly arising households, that the strategy has, through the delivery of 83 local need affordable homes 2005/06 to 2013/14, helped to address need in the National Park.</p>	To reduce the length of the plan (as this evidence is set out in the Housing Topic Paper) in response to representation 0058/02 on the length of the plan.
201	Page 127, footnote 298	<p>Rural Housing Project (2008) Exmoor National Park LDF survey of affordable housing need.</p>	Footnote deleted due to the proposed deletion of associated text in para. 6.34

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202	Page 127, footnote 299	Exmoor National Park, West Somerset and North Devon Rural Housing Project: Households in Affordable Housing Need in Exmoor National Park <u>ENPA (2016) Housing Topic Paper</u>	Footnote updated
203	Page 127, para. 6.35	This figure of 90 units should be considered as part of the 306 estimate of 336 affordable households identified needed for West Somerset within the National Park. ³⁰⁰ This estimate, within the affordable need figure of 306, is considered helpful in framing the Local Plan housing strategy for the National Park to 2031. However, t The housing figures set out in this plan should <u>therefore</u> not be used in determining individual planning applications, and parish surveys may ultimately show a different figure for the remaining period of the Local Plan.	For clarification and to reduce the length of the plan.
204	Page 127, para. 6.36	The approach is to provide positively for housing, working through a rural exceptions approach (and without a target) to deliver local needed affordable housing. It is intended that T the method of assessing local housing need by household developed by the Rural Housing Project RHP will continue to inform a needs led approach providing data on need by parish as housing needs change and additional need arises. Proposals in the National Park will only be permitted on a needs led basis where there is evidence of an identified local affordable need (or where proposals for specialist accessible and adaptable, 'rural worker' or 'eExtended fFamily'- dwellings are consistent with the policies in this Local Plan) up to the point at which the National Park would be harmed. As well as new provision, some identified need is likely to be met through re-lets of existing affordable housing.	To reduce repetition ad the length of the plan (as some of this paragraph included in para. 6.31 and elsewhere in the housing section).
205	Page 128, para. 6.37	Taking into account the component of the OAN arising in the North Devon part of the National Park that is included in the North Devon and Torrridge Local Plan and the estimated of need of 306 affordable homes arising in the West Somerset side of the National Park results in a figure for market housing, arising in the West Somerset side of the National Park, of 174 dwellings 2011 31.	Deleted to reduce repetition and the length of the plan – and relevant figure updated in earlier paragraphs.

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206	Page 128, para. 6.38	ENPA has taken account of statutory National Park purposes, the local socio-economic duty to National Park communities and constraints which indicate that development should be restricted and that the ability to meet the full need for housing over the plan period is restrained.	Deleted to reduce repetition and the length of the plan.
207	Page 128, para. 6.39	The NPPF has changed the definition of exception sites to allow, at the authority's discretion, for small numbers of market homes where essential to enable the delivery of significant additional local needs affordable housing.³⁰¹ Reflecting the change in Government policy in the NPPF³⁰¹ and in response to the current reductions in national affordable housing grant, the policies in this plan therefore provide for some flexibility on exception sites /conversions, to consider pPrincipal rResidence housing in Local Service Centres and Villages where it is essential to enable delivery of affordable housing consistent with Plan policies. Such housing may include specialist accessible and adaptable housing for Exmoor's communities helping to address the needs of Exmoor's ageing population older people and/or other vulnerable members of the community who require care and assistance.	To reduce repetition and for clarification. Change in terminology to reflect the Technical Housing Standards – nationally described space standards. These standards are proposed to be included in policy HC-S2 A Balanced Housing Stock as referred to in representation 0063/04. Footnote reference 301 moved after inserted text.
208	Page 128, para. 6.40	Any pPrincipal rResidence housing which may be permitted in accordance with policies in this plan, including to deliver local need affordable housing, <u>the</u> re-use of buildings as dwellings, through subdivision, eExtended fFamily dDwellings or for rural worker dwellings for example may also would , indirectly, contribute to the objectively assessed <u>housing need across the HMA.</u> ³⁰² It is inappropriate to identify a figure for such housing in a Exmoor National Park and the National Parks Circular is clear that National Parks are not suitable locations for unrestricted housing and general housing targets are not provided for them.	To correct a grammatical error, and for clarification and consistency.
209	Page 128, para. 6.41	Allowing for an element of market ('Principal Residence') housing as a response to the reduction in levels of public housing grant available to registered housing providers and where essential to deliver the affordable housing on exceptions	To simplify the plan.

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		sites will, if permitted, result in additional units set against the housing supply identified in the SHLAA - This would use up the finite supply of suitable housing land at a faster rate – land with the potential to accommodate future local needs affordable housing both in and beyond the period of this Local Plan.	
210	Page 128, para. 6.42	The National Park Authority will ensure robust assessments, <u>using ‘an open book’ approach</u> are used to inform viability in such cases to <u>be certain that Principal Residence housing is essential for the viability of the scheme; that there are no alternative sources of funding; and to ensure that development costs and land values are reasonable, commensurate with a rural housing exception site approach.</u> The number of any market (‘Principal Residence’) homes which may be permitted will be the minimum number needed to deliver the affordable housing. <u>The underlying principle is that the Principal Residence housing would replace previously available public housing grant to Registered Providers rather than increase site or building value. Higher land or building values impact on scheme viability resulting in a greater number of Principal Residence units of housing to deliver the affordable. This would use up suitable existing sites and buildings more quickly, reducing the ability to deliver affordable housing in the National Park in the longer term.</u>	For clarification and to reduce repetition and simplify the plan by combining references on the approach to viability and the use of an open book approach to one part of the housing section.
211	Page 129, para. 6.43	Applying the ‘exceptions’ approach - that local need affordable housing may be permitted, where new housing would not normally be allowed - has the effect of reducing the value of land and buildings to a more reasonable level so that local communities and housing providers can acquire sites and buildings for affordable housing. Within the terms of the local needs housing policies, affordability is judged on a household-by-household basis. Those in need of affordable housing will be households who cannot afford to purchase <u>rent or buy</u> a home on the open market. <i>[split to create new paragraph 6.43A]</i>	For clarification.

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		<p>All types <u>A range</u> of tenures can contribute to the stock of affordable housing - housing for rent, shared equity or low-cost 'intermediate' owner occupied properties housing. This reflects the range of incomes of those households in need of affordable housing. Intermediate housing will be affordable to a proportion of households in housing need but is unlikely to be affordable to those households on the lowest incomes. In Exmoor National Park, to be considered as affordable housing, eligibility will be determined with regard to local incomes and local rents/house prices and will include with restrictions, including local occupancy ties, through a planning obligation to ensure they remain affordable for future eligible households in perpetuity. However, because <u>Since</u> the National Park Authority cannot directly control tenure through planning conditions or agreements, different needs will be matched to the appropriate type of property.</p>	
212	Page 129, para. 6.44	<p><u>The Need for Rented Affordable Housing</u></p> <p>Because of low income levels, most local households in housing need will need rented property controlled by a Registered Provider or other landlord.^x Evidence of income and affordable rent levels indicates that to be truly affordable, rent will need to be based on social (<u>or 'formula'</u>) rent levels.</p> <p><i>Insert footnote:</i></p> <p>^x <u>Housing Vision (2014) SHMA: Exmoor National Park in West Somerset Update. ENPA, Dulverton Table 5.2 and key findings. 50.44% of all ENP households need social rent and 10.8 % intermediate housing. (i.e. of those households in need of affordable housing almost five times as many need social rented housing than owner occupied/rented intermediate affordable housing).</u></p>	For clarification and to update the plan.

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213	Page 129, NEW para. 6.44A	6.44A <u>Anyone building housing to rent out should set the rent at or below the current “Affordable Rent” used by Registered Providers building in the National Park. In all cases, the National Park Authority will work with applicants and seek the advice of the District Housing Authorities on a case by case basis to consider the scheme as a whole, including viability, and to assess whether potential rental levels are likely to be genuinely affordable to households in local housing need.</u>	Formerly part of 6.49 with additional text for clarification.
214	Page 129, para. 6.45	Custom/self build is a method of achieving affordable housing which may be possible for those <u>Some households, who are not able to afford a home on the open market but who are on incomes higher than the lowest incomes, but who are not able to afford a home on the open market. to may consider owner occupation. Often called ‘intermediate housing’ these are homes for sale below market levels subject to the criteria in paragraph 6.43A above. These can include low cost homes for sale and shared equity (shared ownership and equity loans). This is particularly aimed at benefiting young first time buyers to enable them to remain in their communities. In this way, the Government’s objectives for starter homes for younger people are applied in the plan appropriately in a National Park context since HC-S1 and policies for conversions and new build housing in settlements apply to brownfield as well as greenfield land. Experience of implementing the housing policies in the 2005 Plan has shown that there may be opportunities for Housing Providers to provide serviced self-build plots as part of a larger scheme. The policies in this plan provide a flexible approach for affordable housing with local occupancy ties which can apply to owner occupied housing as well as to rented housing where there is an identified local need for it. This includes custom / self build housing and/or housing for first time buyers. In this way, Plan policies apply the Government’s objectives for custom/self build, starter homes and shared ownership appropriately in an Exmoor National Park context.</u>	Providing clarification on home ownership in the National Park and to reduce repetition (as further detail on custom/self build housing is also set out for Policy HC-D5 and explanatory text).

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		<p><i>[split to create new paragraph 6.45A to be inserted after text box below]</i></p> <p>6.45A ENPA will work with partners, including local communities, who may wish to consider ways in which households can be assisted to provide homes, including site preparation and provision of services <u>for self/custom build</u>. <u>ENPA will also consider proposals for low cost shared ownership housing. It will be necessary to ensure it is genuinely affordable. In all cases, the need for the number, type, size, and tenure of proposals will be assessed.</u> There is growing interest in the potential for community land trusts to initiate affordable housing schemes and this approach may be able to achieve mixed schemes with, <u>for example</u>, rented affordable housing, potentially managed by Registered Providers and <u>local need custom/self- build housing and/or housing for first time buyers</u> to address a the range of needs within a community.</p>	
215	Page 129, para. 6.46	<p>ENPA will consider low cost shared ownership housing only if there is a demonstrated need for it. Evidence indicates that, when both the rent and the mortgage element is taken into account, it may be unaffordable for all but a very few households.</p>	To avoid repetition and simplify the plan. Text is incorporated into para 6.45A.
216	Page 129, para. 6.47	<p><u>Controlling Affordability</u></p> <p>Taking account of the significant gap between open market private rents and open market house prices in the National Park and many local incomes, affordability of owner occupied dwellings will be achieved through both:</p> <p>(i) The local occupancy tie, which will reduce house values and</p> <p>(ii) Keeping the size of properties as small as possible commensurate with the needs of the intended household, and recognising the role of the property to meet future needs of the community for affordable housing. Individual privately or owner occupied dwellings should therefore have a <u>gross internal area net floorspace of 930 square metres (sqm) or less unless it is housing controlled through a Registered Provider where the gross internal area will need to be</u></p>	<p>Change in terminology to reflect the Technical Housing Standards – nationally described space standards. These standards are proposed to be included in policy HC-S2 A Balanced Housing Stock.</p> <p>Change to 93sqm also partially responds to representation number 0058/08.</p>

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		<p><u>consistent with the identified need and the appropriate nationally described space standard (Policy HC-S2: A Balanced Local Housing Stock).^x</u></p> <p><i>Insert footnote:</i> ^x <u>93 sqm is consistent with a 3 bedroom, 2 storey, 5 person standard in nationally described space standards.</u></p>	
217	Page 130, para. 6.49	<p>At the time of drafting, new housing schemes built by Registered Providers and which receive public housing grant through the HCA must be rented out at 'Affordable Rents' which are pegged at up to 80% of open market rental levels. These may not be affordable to many local households in housing need. Even where the HCA agrees to lower rents, extra grant is not currently available. Anyone building housing to rent out should set the rent at or below the current "Affordable Rent" used by Registered Providers building in the National Park. In all cases, the National Park Authority will work with applicants and seek the advice of the District Housing Authorities on a case by case basis to consider the scheme as a whole and to assess whether potential rental levels are likely to be genuinely affordable to households in local housing need. Evidence of income and affordable rent levels indicates that to be truly affordable rent is likely to be lower and based on social rent levels.</p>	To simplify the plan.
218	Page 130, subheading	STRATEGIC POLICY: HOUSING	Title moved to before para. 6.30A for clarity.
219	Page 130, para. 6.53	The limited number of opportunities for new housing development emphasises the importance of concentrating on the identified local need for affordable (including intermediate) housing within the National Park. Addressing the local need for affordable housing helps those who cannot compete in the open housing market. It is a justifiable reason for new housing provided there is no harm to the National Park and its special qualities. It can also help people who move away	For clarification and in response to representation 0067/18

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		from the National Park (e.g. for further or higher education, early careers and service families) to return within a reasonable period and counteract, to some degree, the overall trend towards an ageing population. <u>Such housing can also be lived in by people with a work connection in the National Park. Live work units are one way in which people can combine living and working and considerations on live work arrangements are set out in paragraph 7.37A of this Plan.</u> As a remote area with all settlements defined as rural, the use of the rural exception sites approach for affordable housing to meet local needs is appropriate for Exmoor National Park. The exceptions approach does not define or allocate sites in a plan. HC-S1 makes it clear that the principal community identified need is for affordable housing with local occupancy ties.	
220	Page 141, para. 6.54	Policy HC-S1 also makes provision for the identified local housing needs of rural land based workers (linking to policies for housing in the open countryside through HC- D7 <u>D6</u> on conversions, HC- D8 <u>D7</u> for new build dwellings, HC- D9 <u>D8</u> <u>for rural workers</u> and HC- D10 <u>D9</u> Succession Farming); older people and/or other vulnerable members of the community in need of <u>specialist housing where adequate care and assistance cannot be provided within the existing housing stock accessible and adaptable housing</u> (Policy HC-D3) and <u>‘Extended Families’</u> through the reuse of an existing traditional building (Policy HC-D4).	To update policy numbering to reflect the deletion of policy HC-D6 and change to subsequent policy numbers. To change the terminology to reflect the Technical Housing Standards – nationally described space standards.
221	Page 141, para. 6.57	The National Park Authority will work in partnership to help implement housing policies: delivering housing for the benefit of local communities while conserving and enhancing the National Park. Delivery will be monitored and reported. This will enable the National Park Authority to openly review the effectiveness of policy; taking into account changing circumstances in housing finance and delivery and the capacity to accommodate development in order to secure the necessary amounts of locally needed affordable housing. It will also bring forward Supplementary Planning Documents and legal agreements to provide a	To simplify the plan and correct a grammatical error.

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		comprehensive framework within which local and affordable and housing can be secured in perpetuity.	
222	Page 132, Policy HC-S1	<p>HC-S1: HOUSING</p> <p>1. The purpose of housing development will be to address the housing needs of local communities. The principal community identified need is for affordable housing with local occupancy ties. Exceptionally, new housing will be acceptable where it addresses an identified local housing need for:</p> <p>a) affordable homes that remain affordable in perpetuity and which will be occupied by local persons in proven housing need in accordance with the local occupancy definition in HC-S3.</p> <p>b) rural workers in agriculture, forestry or other rural land based enterprises with a proven essential, functional need in accordance with HC-D7 or HC-D8 and HC-D89 or to enable succession farming on established farm businesses in accordance with HC-D7 or HC-D8 and HC-D910.</p> <p>c) specialist housing for older people and other vulnerable members of the community, in accordance with HC-D3 which will be occupied by local persons in perpetuity; or</p> <p>c) d) an “eExtended fFamily dwelling”, in accordance with HC-D4, which will be occupied by local persons in perpetuity.</p> <p>2. <u>Accessible and adaptable housing for older people and other vulnerable members of the community, will be occupied by local persons in perpetuity, and will only be considered where it will help to deliver an identified need for local affordable housing, in accordance with HC-D3.</u></p> <p>3. 2 Consistent with an exceptions approach to housing, provision will not be made for housing solely to meet open market demand and housing land will not be allocated in the development plan. 3. ‘Principal fResidence’ market</p>	<p>To reflect representation 0043/27 on criterion 1b). Replacement of clause c) with clause 2) for clarification and change in terminology to reflect the Technical Housing Standards – nationally described space standards. These standards are proposed to be included in policy HC-S2 A Balanced Housing Stock. Clause 4 a) and b) deleted to reflect judgement in R (on the application of West Berkshire District Council and Reading Borough Council) v Secretary of State for Communities and Local Government [2015] and subsequent change to the PPG.</p>

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		<p>housing will only be considered where it is essential to deliver an identified need for local need affordable housing and in accordance with Policy HC-S4.</p> <p>4. 'Principal residence' market housing will only be considered as long as government guidance on planning obligations relating to thresholds for affordable housing is extant:</p> <p>a) through the change of use of existing buildings or the redevelopment of a 'vacant building' (including provisions for commuted sums towards local needs affordable housing in the National Park); and</p> <p>b) only within Local Service Centres and Villages.</p> <p>If the guidance changes, this provision will no longer apply and 100% affordable housing will be sought.</p>	
223	Page 133, Text Box	<p>Text Box</p> <p>Government guidance on planning obligations, inserted into the PPG, is in force at the time of the drafting of this Local Plan. It sets out minimum thresholds for the size of housing developments where affordable housing can be sought and introduces a vacant buildings credit. The thresholds for National Parks can be set at 5 dwellings or fewer. The guidance is clear that rural exceptions sites are excluded from this change.</p> <p>While this guidance is in force only, as a variation to HC D1, applicants will be able to change the use of existing non-residential buildings or redevelop vacant buildings to dwellings in Local Service Centres or Villages (see Policy GP3). In such cases the following thresholds will apply:</p> <p>where the existing building is only able to accommodate up to 5 dwelling units or fewer, and/or have a maximum combined gross floorspace not exceeding 500m²; or</p>	<p>Text box deleted to reflect judgement in R (on the application of West Berkshire District Council and Reading Borough Council) v Secretary of State for Communities and Local Government [2015] and subsequent change to the PPG.</p> <p>Representation numbers 0063/02 and 0066/06 are no longer applicable.</p>

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		<p>where the existing building is only able to accommodate between 6 and 10 dwelling units, and/or have a maximum combined gross floorspace not exceeding 1000m². From units 6-10, the National Park Authority will expect that a financial contribution will be provided towards the provision of local needs affordable housing in the National Park.</p> <p>where the existing building is able to accommodate 11 dwelling units (or more), and/or has a maximum combined gross floorspace greater than 1000m²; the National Park Authority will expect any housing to be on site and for units 11 and above to meet a local affordable need in accordance with Policy HC-D1.</p> <p>The guidance also applies to the change of use or redevelopment of non-residential vacant buildings to housing under the ‘vacant buildings credit’. The guidance specifies that the gross floorspace of housing achieved through the demolition of an existing vacant building and its redevelopment for housing should be no greater than the existing gross floorspace of the existing vacant buildings. Housing which would exceed the gross floorspace will be expected to address an identified local need (clause 1 of HC-D2);</p> <p>In all these cases, new housing whether through the change of use of an existing building or the redevelopment of a vacant building will be expected to be principal residence housing (see HC-S4) and be in line with HC-S2. Changes of use to housing should also accord with CE-S5 and conditions will be attached to planning permissions to remove permitted development rights (see HC-S2 and CE-S5).</p>	

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224	Page 133, para. 6.59	<p>Based on evidence on <u>The housing stock as a whole should provide a range of accommodation sizes, types and tenures to meet the needs of all sections of the local community. The National Park’s existing housing stock has a higher than average proportion of larger and detached dwellings.</u> †To create more balanced communities and address the needs of existing and future households, there is a need for smaller and more affordable dwellings, such as terraces and flats and for tenures of new housing that are aligned to identified needs. Smaller dwellings are also likely to take up less land - an important consideration given the scarcity of suitable housing land in Exmoor’s settlements. Following an exceptions site approach, the need for the mix of dwellings and the viability of a proposal, will be assessed on a case by case basis. The Exmoor Housing SPD will provide further guidance.</p>	To simplify the plan by incorporating text from para. 6.60 and for clarification.
225	Page 133-134, para. 6.60	<p>The housing stock as a whole should provide a range of accommodation sizes, types and tenures to meet the needs of all sections of the local community. This plan necessarily focuses on new development which is a small part of the National Park’s existing housing stock. Policy HC-S2 aims to ensure, in terms of size, type and tenure, that new housing permitted in the National Park will result in a better mix of dwellings and that it contributes to that which is needed locally. It is intended to help achieve more balanced, living and working communities by giving those in housing need, including local young people and those with specialist housing needs, the opportunity to stay in their community and help maintain the <u>contribute to the</u> viability of important services, such as schools. <i>[split to create new paragraph 6.60A]</i> 6.60A In delivering affordable homes, housing providers have to consider a variety and range of needs for different sizes, types and tenure of home (such as those for local workers, specialist <u>accessible and adaptable</u> housing, for older people and other vulnerable members of the community and <u>housing for</u> those with care needs, <u>and</u> single people or young families). This is an important part of assessing</p>	To simplify the plan and avoid repetition including with para. 6.59. To change terminology in respect of accessible and adaptable homes to reflect the Technical Housing Standards – nationally described space standards – proposed to be included in policy HC-S2 A Balanced Housing Stock. To provide update the plan following a viability assessment and to provide clarification on the approach to viability of proposed housing.

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		<p>need and housing providers and developers of two or more affordable homes, will need to show that they have taken into account the housing needs of the community. Single properties will tend to be from private developers or self-builders aiming to satisfy a particular individual (though proven) need. <u>Following a rural exceptions site approach, the need for the mix of dwellings and the viability of a proposal, will be assessed on a case-by-case basis.</u></p> <p><i>[new paragraph 6.60B]</i></p> <p><u>New housing development will be encouraged to be designed to enable it to meet the Building Regulation requirement for accessible and adaptable dwellings to help meet the needs of people over their lifetime. This should improve the suitability of new housing so that as their needs change, people can remain in their own homes for longer. This is particularly important in Exmoor given the ageing population.^{X1} Evidence indicates that it will be viable in housing developments of five or more dwellings to meet this standard for 20% of the dwellings.^{X2}</u></p> <p><i>Insert footnotes:</i></p> <p><u>^{X1} ONS (2011) 2011 Census Exmoor National Park. 20.9 % of the population have their day-to-day activities either limited a lot or a little.</u></p> <p><u>^{X2} Three Dragons2016) Exmoor National Park Viability Assessment, Dulverton, Exmoor National Park Authority.</u></p>	
226	Page 134, para. 6.61	<p>Any market (pPrincipal rResidence) housing developments <u>to deliver affordable housing will also need to reflect the needs of the area for sizes (to nationally described space standards) and types of homes to help create a more balanced housing stock. Dwellings should be no larger than that needed in the area given the above average proportion of larger and detached dwellings. However, the policy requires that such housing should also meet a good standard of floorspace</u></p>	To provide clarification and change terminology to reflect the Technical Housing Standards – nationally described space standards – proposed to be included in

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		<p>consistent with the forthcoming Exmoor Housing SPD. This will help to avoid discrepancies between the floorspace standards required by the HCA for affordable housing and that of any principal residence housing, which may be permitted to deliver it. The need for specialist housing for older people and vulnerable members of the community should also be considered and proposals should accord with Policy HC D3. Specialist housing will always need to either itself meet an identified local need for affordable housing or, where there is a proven need for affordable homes and there is an identified need for specialist housing, part or all of that 'principal residence' housing required to cross subsidise the affordable housing will be specialist housing with a local occupancy tie.</p>	<p>policy HC-S2 A Balanced Housing Stock and in response to representation 0063/04. To reduce the length of the plan.</p>
227	Page 134, para. 6.62	<p>Individual privately or owner occupied dwellings, including individual privately or owner occupied dwellings and self/custom build, should have a <u>net floorspace gross internal area</u> of 90sqm or less unless it is housing controlled through a Registered Provider. The 'net internal floor area' is the area on one or more floors enclosed by the perimeter walls of a dwelling and is measured to the opposing unfinished faces. It includes the area occupied by partitions, the area taken up on each floor by any staircase, the area of any chimney breast or flue, and the area of any external WC. It excludes the floor area of any general store, dustbin store, fuel store, garage or balcony; any area in rooms with sloping ceilings to the extent that the height of the ceiling does not exceed 1.5m; and any lobby/porch open to the air.</p>	<p>Change in terminology to reflect the Technical Housing Standards – nationally described space standards - proposed to be included in policy HC-S2 A Balanced Housing Stock. The definition of gross internal area will be a proposed change in the Glossary section.</p> <p>90sqm updated to 93sqm to be consistent with the nationally described space standards.</p>
228	Page 134, para. 6.63	<p>The National Park Authority will consider local need dwellings larger than 90sqm floorspace only where they are controlled through a Registered Provider (including owner occupied dwellings controlled through a Registered Provider), and where the identified need is for a larger dwelling. The size of the dwelling</p>	<p>90sqm updated to 93sqm to be consistent with the nationally described space standards.</p>

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		<p>should be based on the HCA Scheme Development <u>nationally described space standards. The only other exception to the 93 sqm floorspace would be where the proposal is for the conversion and change of use of an existing building to a dwelling and the existing building is larger than 93 sqm. Proposals should accord with policy CE-S5. The National Park Authority intends to produce a supplementary planning document to provide advice on addressing the local need for affordable housing, which will include floorspace guidelines.</u> Terraced and modest semi-detached houses and flats will be expected in the majority of cases.</p>	<p>Change in terminology to reflect the Technical Housing Standards – nationally described space standards - proposed to be included in policy HC-S2 A Balanced Housing Stock.</p>
229	Page 134, para. 6.64	<p>The fundamental objective under these housing policies is to ensure that those new affordable dwellings, which are permitted, remain more affordable to meet the community's needs in perpetuity with new privately/ owner-occupied local need affordable, housing restricted to 90sqm net floorspace. The size of other dwellings including specialist <u>accessible and adaptable</u> housing 'eExtended Family', and <u>Succession Farm</u> dwellings is also limited to <u>903sqm</u>. The size of rural land based worker dwellings should be in accordance with Policy HC-D9D8.</p>	<p>To reduce the length of the plan. Change in terminology to reflect the Technical Housing Standards – nationally described space standards - proposed to be included in policy HC-S2 A Balanced Housing Stock. 90sqm updated to 93sqm to be consistent with the nationally described space standards. Change in policy number to reflect deletion of policy HC-D6 and change to subsequent policy numbers.</p>
230	Page 134-135, para. 6.65 – 6.66	<p>Permitted development rights granted by the Town and Country Planning (General Permitted Development) Order 2015, will be removed <u>to ensure that dwellings do not exceed 93 sqm in size and, where the net internal floorspace limitation will not be exceeded this will</u> <u>to enable the National Park Authority to assess the impact of increasing the size and on the affordability of any extensions</u></p>	<p>Merge paragraphs 6.65 and part of para. 6.66 to simplify and reduce the length of the plan.</p>

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		<p>on these dwellings on an individual basis and in the case of subdivisions, to assess the cumulative impact of successive extensions. Applications for extensions will be assessed against Policy HC-D15D14. The principal community need identified by Policy HC-S1 is housing affordable to local people in perpetuity. Policy HC-S3 ensures that this will be secured through requiring applicants to enter into a legal agreement (in the form of a planning obligation under Section 106 of the Town and Country Planning Act 1990). The National Park Authority considers that obligations provide greater certainty in securing housing for local needs and ensures that in any change of occupation, the new occupant is aware of the restriction. In respect of the conversion of buildings and subdivisions, the additional reason for withdrawing permitted development rights is to protect the character and appearance of the building.</p>	<p>To provide justification for clause 1 d) of the policy in respect of the removal of permitted development rights. Deleted text ('The principal....to ...restriction') moved to para. 6.82A as justification for policy HC-S3.</p>
231	Page 135, para. 6.67	<p>New housing development will be expected to be designed to enable it to be adapted to the needs of people over their lifetime. Improvements to existing homes will also be encouraged. This should improve their suitability so that as their needs change, people can remain in their own homes for longer. A Housing Supplementary Planning Document will provide guidance for applicants.</p>	<p>To simplify the plan.</p>
232	Page 135, Policy HC-S2	<p>HC-S2 A BALANCED LOCAL HOUSING STOCK</p> <p><u>1.</u> All new residential development will contribute towards the creation of sustainable, balanced, inclusive communities by providing housing that addresses the local needs of present and future generations, through: a) Hhaving regard to the existing housing stock in the locality, ensuring that new housing provision will, through the mix of new dwellings in terms of size, type and tenure, and meet the needs of Exmoor's communities, and</p> <p><u>2.</u> New housing will offer a good standard of accommodation by being constructed to be neither too large nor too small and using flexible nationally described space standards that enable dwellings to be adapted to the needs of people over their lifetime.</p>	<p>Change to reflect the Technical Housing Standards – nationally described space standards in response to representations 0063/04 and 0063/08; following an updated viability assessment.</p> <p>Change to policy numbering including to reflect deletion of HC-D6 and changes to subsequent policy numbering.</p>

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		<p>3. <u>All new build housing developments will be encouraged to be constructed in accordance with Building Regulations Requirement M4(2) for accessible and adaptable dwellings or successor regulations. In new build developments of 5 or more dwellings, a minimum of 20% will be required to meet this standard.</u></p> <p>4. b) For local need affordable dwellings permitted under HC-S1 and HC-D1, or HC-D2, HC-D5, HC-D6, or HC-D67, the dwelling(s) will be affordable by size and type to local people and will remain so in perpetuity. For private owner occupied local need <u>affordable dwellings, including custom/self build, specialist accessible and adaptable housing (HC-D3), ‘eExtended fFamily dwellings’ (HC-D4) and ‘sSuccession fFarm dDwellings’ (HC-D910), the net floorspace gross internal area will be 930 square metres or less.</u></p> <p>5. c) Where permission is granted for <u>dwellings created through subdivisions and dwellings of up to 930sqm, including those created through subdivisions</u>, a condition will be attached removing permitted development rights in respect of extensions to ensure that dwellings do not exceed 90sqm in size.</p> <p>6. 2. Where permission is granted for employment uses as part of a proposal, a condition may be attached tying the occupation of the dwelling to the operation of the <u>business space.</u></p>	<p>The definition of gross internal area will be a proposed change in the Glossary section. 90sqm updated to 93sqm to be consistent with the nationally described space standards. This also partially responds to representation numbers 0058/10 and 0061/01 (objecting to 90sqm limitation).</p> <p>Policy restructured to ensure all clauses apply as appropriate in response to representation 0043/28.</p> <p>For clarification, the word ‘space’ added to the end of clause 6.</p>
233	Page 136, para. 6.69	<p>Before new affordable housing can be considered, the local community need for the new dwelling(s) (including conversions) must be established. The distinction between 'demand' and 'need' has to be recognised. The assessment of community need will be through an up-to-date local housing needs survey based on the process and survey forms established by the Rural Housing Project and prepared by or in consultation with the district council (as local housing authority) and in consultation with the Ttown/Pparish Council(s). Private surveys, without the assistance of the Rural Housing Enabler or ‘Devon Communities Together’, a</p>	<p>To correct grammatical error, update plan and provide clarification.</p>

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		Registered Provider or District Council (<u>as housing authority</u>), are not acceptable. Proof of an individual's need within a community will be established through a detailed questionnaire. In assessing proposals for a single local needs dwelling, the extent to which it forms part of a wider community need including any up to date local housing need survey and the likelihood of the type, size and location of the property meeting an ongoing community need for housing if the individual subsequently moves out of the property will be scrutinised. There needs to be evidence that an ongoing need exists before permission is granted. In each case the National Park Authority will carefully examine the survey results to ensure that a genuine need exists for the number, size, type and tenure of dwellings proposed.	
234	Page 136, para. 6.70	In order to comply with the Local Plan strategy to minimise new build housing on greenfield land, before applying for a new dwelling or housing, an individual or group will be expected to have examined the availability of properties and existing buildings in their own and adjoining Pparishes and the locality. Where existing property of a suitable price, size and type is, or is likely to become, available, and the existing owner has indicated a willingness to sell, or where there are opportunities for extensions and/or subdivision to create smaller more affordable units of accommodation, new build housing is unlikely to be permitted.	To correct grammatical error.
235	Page 136, para. 6.71 b)	b) Where this cannot be achieved, from sites/ buildings within the development boundary well related to existing buildings	Correction – there are no development boundaries
236	Page 137, para. 6.73	Where Pparishes do not have an identified settlement (or suitable site within one), the search for a site for a local needs house(s) will be directed towards an adjoining Pparish. Where Pparishes are split by the National Park boundary and the settlement lies outside the National Park, the need for housing should be met in that part of the settlement lying outside the National Park and in accordance	To correct grammatical error.

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		with the relevant District Council's planning policies. Where parishes are split by the National Park boundary and there is no identified settlement outside the National Park in that parish, then residents who otherwise meet the requirements of HC-S3, including one or more local connection criteria, may be considered for local needs housing in the National Park. For housing proposals in rural communities in the open countryside, only those with a local connection to that parish will be considered to comply with the policy. Where a rural community in the National Park is in a parish split by the National Park boundary, only those households with a residency in that part of the parish lying within the National Park will be considered to comply with the local connection.	
237	Page 137, para. 6.74	Residential conversions in settlements, as well as in the open countryside, will be expected to contribute to the stock of local needs housing. For larger buildings, affordability will be achieved through creating more than one unit. This will need to be done sympathetically to help retain the building's original character. Conversions providing employment space alongside a dwelling(s) are also positively encouraged. Registered Housing Providers can play a valuable role in sub-dividing existing properties within settlements to create smaller units of affordable accommodation.	For clarification and to update the plan.
238	Page 137, para. 6.75	For the purposes of the policies within this Local Plan 'local needs' housing is defined as housing which is intended to meet the needs of the local community. Local community includes those people with strong local connections with a P parish or adjoining P parish(es), defined as a minimum period of 10 years permanent and continuous residency. This includes people who have previously lived within the P parish(es) for 10 years or more and who want to return to their community. 10 in the last 30 years means they can have lived away for up to 20 years. This may apply to service families with a member(s) of the household who	To correct grammatical errors.

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		has lived away as a result of serving in the armed forces, who wishes to return and who is in affordable housing need.	
239	Page 137, para. 6.77	As well as residency requirements, the definition of local connection includes 'Exmoor Workers' and people who need to live close to their place of work within the Pparish(es). Evidence from the applicant on the security of their jobs and the value of their work to the National Park and its communities, will be assessed. The National Park Authority intends to produce a supplementary planning document to provide guidance on application of this clause of the policy including what constitutes an 'Exmoor worker'.	To shorten the plan.
240	Page 137, insert new paragraph 6.77A	<u>6.77A Local need includes those people with strong local connections, but who cannot afford to buy or rent existing housing in the locality. 'Locality' includes the parish, adjoining parishes and an area within a reasonable travelling distance of their place of work and local services.</u>	Formerly paragraph 6.79 (page 138)
241	Page 138, para 6.79	Local need includes those people with strong local connections, but who cannot afford to buy or rent existing housing in the locality. 'Locality' includes the Parish, adjoining Parishes and an area within a reasonable travelling distance of their place of work and local services.	For clarification.
242	Page 138, para 6.80	ENPA will consult the District Council Housing Officer and work with the Rural Housing Enabler <u>as appropriate</u> , to obtain assessments of whether applicants' are in affordable housing need including their ability to afford existing housing and whether they are currently in unsuitable housing. <u>For housing through Registered Providers, the Devon Homechoice or Somerset Homefinder systems hold information provided by potential tenants on affordable housing need.</u>	For clarification and to update the plan.

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243	Page 138, insert new paragraph 6.82A	6.82A <u>Policy HC-S1 requires that housing is affordable to local people in perpetuity. Policy HC-S3 ensures that this will be secured through requiring applicants to enter into a legal agreement (in the form of a planning obligation under Section 106 of the Town and Country Planning Act 1990). The National Park Authority considers that obligations provide greater certainty in securing housing for local needs and ensures that in any change of occupation, the new occupant is aware of the restriction.</u>	Moved from before Policy HC-S2 as explanatory text relates to clause 2 of HC-S3.
244	Page 138, para. 6.85	Ultimately the cascade can go as far as the National Park boundary for privately owned dwellings. Occupants living outside the National Park will only be considered where they meet the local definition in clauses 1 c), d) or e) of Policy HC-S3 i.e. those persons with a previous residence of 10 or more years in the last 20 <u>30</u> years; or needing to move into the National Park to live close to a local person for age / medical reasons or Exmoor workers and those needing to live close to their place of work.	Correction to text to ensure consistency with policy HC-S3.
245	Page 138, para. 6.86	For housing owned or controlled by a Registered Provider (including Housing Associations) where there are no local persons meeting the above requirements, the cascade will then go as far as the district council area outside the National Park to allow persons with strong local ties to the remaining district council area outside the National Park, to occupy the dwellings. This approach provides sufficient flexibility to ensure that an occupier can be found, though with a connection to the area, while ensuring that private/owner occupied dwellings remain more affordable.	Correction
246	Page 139, Policy HC-S3	HC-S3 LOCAL OCCUPANCY CRITERIA <u>FOR AFFORDABLE HOUSING</u>	To provide clarity that policy relates to criteria for affordable housing.

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247	Page 140, para. 6.87	Principal Residence housing is a form of market housing controlled by a mechanism which ensures it can be lived in by anyone but only as their principal residence. The aim of this mechanism is to prevent any new market housing being used as a second or holiday home given the existing high percentage of homes in the National Park with no usual residents (19%) and its impact on the social well-being of a number of communities where the overall proportion may be significantly higher e.g. Lynton & Lynmouth where 28.5% of household spaces have no usual residents. ³⁰⁵ <u>All</u> new housing in the National Park should be affordable housing to meet local needs (Principal Residence housing will therefore only be permitted in very specific circumstances where it can be demonstrated to be essential to enable the delivery of affordable housing schemes in accordance with Policies HC-D1 (Conversions to Housing in Settlements) or HC-D2 (New Build Housing in Settlements). ‘Principal Residence’ housing will also apply to any new dwelling units created through the subdivision of existing dwellings (HC- D14 <u>D13</u>) and the conversion of hotels/guesthouses to accommodation and in accordance with the tests set out in Policy RT-D3 (Safeguarding Serviced Accommodation) and Policy HC-D6 (The Change of Use of Serviced Accommodation to Housing).	For clarification. To reflect deletion of policy HC-D6
248	Page 140, para. 6.88	The capacity of Exmoor’s settlements to accommodate further housing <u>on greenfield sites without harming the landscape of the National Park</u> has been investigated through a detailed landscape sensitivity study. It shows that, on greenfield land, only 333 new build houses could potentially be provided within the settlements identified in the 2005 Local Plan, without harming the landscape of the National Park. This figure does not include opportunities arising from redevelopments, brownfield land and conversions of existing buildings. However, neither does it include other issues which may mean that remaining sites are not suitable for housing development. This demonstrates the importance of making maximum use of the existing stock of accommodation, buildings and previously	To avoid repetition and simplify and shorten the plan reflecting representation 0058/02.

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		<p>developed land/buildings to reduce the level of greenfield housing development within the National Park and ensure that, in the longer term, there will still be some suitable housing sites in settlements to help meet the needs of the National Park’s communities. The approach in this <u>This plan seeks to provide for housing to address the needs of Exmoor’s communities with the priority being local needs affordable housing</u> by ensuring that most housing <u>development and all new build housing</u> is in settlements (other than that new build for the proven needs for land based workers) helping to sustain them over the long term. The spatial strategy is set out in Section 3 of this plan at Policy GP3.</p>	
249	Page 141, para. 6.89	<p><u>A range of affordable tenures can help address the local need for affordable housing. The Government wants to enable more people to build their own home.³⁰⁶ The National Park Authority sees €Custom/self-build as a can be a means of local people meeting their own need for affordable housing (policy HC-D5 Custom/Self Build Local Need Housing).³⁰⁶ although the majority of households in need of housing will, due to local incomes, need rented housing at social or near social rent levels. The National Park Authority has established a self-build register of people interested in self-build or custom build as part of a joint ‘Right to Build’ Vanguard Project with Dartmoor National Park Authority.³⁰⁷ The register will be used to help identify and address the local need for affordable housing of people who work and/or who have longstanding residency in the National Park in line with Policy HC-S1 and other housing policies in this plan. Some sites have been assessed through the SHLAA process, and will be considered for self-build schemes. As part of the Vanguard project, landowners were invited to suggest sites or buildings, which are suitable for new build self-build housing or for housing through conversions. These will be within or adjoining the settlements in the National Park. These sites might be small pieces of land/buildings for a single dwelling, or larger ones for a number of homes. In this way the Government’s</u></p>	<p>For clarification and to avoid repetition and shorten the plan (representation 0058/02). Further explanation of custom/self build is included before policy HC-D5.</p> <p>Footnote 306 moved to align with inserted text.</p>

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		starter home initiative will be applied appropriately in the context of a National Park through a rural exceptions site approach where new affordable housing with a local tie may be permitted, including on brownfield sites consistent with other Plan policies. Local need affordable custom/self build housing may also be allowed outside settlements in accordance with Policy HC D5.	
250	Page 141, para. 6.90	<p>Planning policies continue to prioritise affordable housing, but, in Local Service Centres and Villages, an element of “Principal Residence” market housing may be considered <u>only</u> where this is essential to facilitate the provision of needed affordable housing. Where there is evidence of need for custom/self-build housing and/or specialist <u>accessible and adaptable</u> housing, the National Park Authority, in discussion with the relevant housing authority, will seek proposals to provide for it, either as part of the affordable local needs housing itself (including custom/self-build plots) or where it is proven to be required to deliver the affordable housing, as ‘Principal Residence’ housing. Land values will need to be kept to affordable housing levels for all plots. The only other circumstances in which Principal Residence housing may be permitted is where it is through the redevelopment of a ‘Vacant Building(s)’ in accordance with HC D2 clause 2 b) and HC S1 clause 4 only or through their change of use. Agricultural buildings and previously developed land without buildings do not come within the definition of ‘Vacant Buildings’.</p>	<p>For clarification and to avoid repetition. Change in terminology to reflect the Technical Housing Standards – nationally described space standards. Text from ‘The only other circumstances... to Vacant Buildings’ deleted to reflect judgement in R (on the application of West Berkshire District Council and Reading Borough Council) v Secretary of State for Communities and Local Government [2015] and subsequent change to the PPG.</p>
251	Page 142, para. 6.92	<p>All housing must meet an identified local need for affordable housing and be lived in by people who meet the requirements of the local occupancy criteria in perpetuity. This will be secured through a planning obligation (Policy HC-S3). All such housing will have a floorspace of 90<u>93</u>sqm or less in accordance with Policy HC-S2.</p>	<p>90sqm updated to 93sqm to be consistent with the nationally described space standards.</p>

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252	Page 142, para. 6.93	<p>A key factor in achieving affordable housing is to obtain buildings at the lowest possible value taking account of existing use value, such that it is possible for housing associations, community land trusts and local households to acquire it for the purposes of affordable housing. The impact of the housing policies within this Local Plan, based on the rural 'exceptions' approach, should be to keep building development values lower than would otherwise be the case. Proposals which include 'Principal Residence' housing to help deliver affordable housing in Local Service Centres or Villages, will be scrutinised through 'an open book' approach to ensure it can be demonstrated that it is essential for the viability of the scheme (because it replaces current reductions in public housing grant to Registered Providers rather than increases building value), and that there are no alternative sources of funding but cross-subsidy (through 'Principal Residence' housing). Higher building values would impact on scheme viability and in the longer term would result in a greater number of houses to deliver the affordable using up suitable existing buildings more quickly, so increasing pressure on greenfield sites and reducing the ability to deliver affordable housing for local needs in the National Park in the longer term.</p>	Deleted text amalgamated with earlier text on viability prior to policy HC-S1 to avoid repetition and simplify and shorten plan (representation 0058/02).
253	Page 142, para. 6.94	<p>For clause 3 <u>2</u> of Policy HC-D1, buildings which can only accommodate one dwelling unit will need to be affordable housing. Whether a building is able to accommodate more than one dwelling unit, will be judged on the basis of a maximum floorspace of 90 <u>93</u>sqm or less.</p>	To reflect changes to the 90sqm updated to 93sqm to be consistent with the nationally described space standards.
254	Page 142, para. 6.95	<p>Where a scheme would provide more affordable homes than are needed in the parish and the adjacent parishes, based on robust assessments of housing need as set out in the preamble <u>supporting text</u> to local occupancy criteria, a financial</p>	For clarification.

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		contribution will be required towards affordable housing needed elsewhere in the National Park in accordance with Policy GP5.	
255	Page 142, para. 6.96	Where there is evidence of need for specialist <u>accessible and adaptable</u> housing, proposals for the change of use of existing buildings to housing should provide for it in accordance with HC-D3, whether through affordable local needs housing or where it is proven to be required to deliver the affordable housing.	Change in terminology to reflect the Technical Housing Standards – nationally described space standards - proposed to be included in policy HC-S2 A Balanced Housing Stock.
256	Page 142, para. 6.97	Policies provide for ‘Extended Family Dwellings’ in settlements through the change of use of an existing traditional building and where they otherwise accord with Policy HC-D4 including being within the curtilage of, and in close association with, an existing dwelling and where the occupants meet the requirements of that P policy.	To ensure consistency.
257	Page 142, para. 6.100	The National Park Authority intends to provide further guidance in a supplementary planning document on the implementation of its housing policies.	To simplify and shorten the plan.
258	Page 143, Policy HC-D1	<p>HC-D1 CONVERSIONS TO DWELLINGS IN SETTLEMENTS</p> <p>1. Within the named settlements, the change of use of a non-residential building(s) to a dwelling(s) will be permitted where:</p> <p>a) the building is well related to existing buildings, and the proposal conserves or enhances the character of the settlement and the building in accordance with CE-S5; and where:</p> <p>b) the proposal meets the requirements of CE-S5;</p> <p>a) e) there is a proven local need for the dwelling(s) which will meet an affordable local need, and the intended occupants meet the requirements of the local need occupancy criteria which will be secured</p>	To simplify the policy and avoid repetition by reducing the number of clauses and cross references. Change in terminology to reflect the Technical Housing Standards – nationally described space standards - proposed to be included in policy HC-S2 A Balanced Housing Stock and in

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		<p>in perpetuity through a planning obligation in accordance with HC-S3; and</p> <p>b) d) the dwelling(s) will be affordable by size and type to local people and will remain so in perpetuity in accordance with HC-S2.</p> <p>2. Proposals for 'extended family dwellings, will accord with criteria 1 (a) and (b) above, be occupied by a person who meets the definition of 'extended family' and be in accordance with HC-D4.</p> <p>2. 3. The intention will remain the provision of 100% <u>local need</u> affordable housing to meet an identified local need and the change of use of a non-residential building to residential will address an identified local affordable need. <u>Where the building is able to accommodate more than one dwelling unit, the following tests will also apply:</u></p> <p>a) it is an element of principal residence market housing in accordance with HC-S4;</p> <p>a) b) it is clearly and robustly demonstrated that it <u>an element of Principal Residence market housing (HC-S4)</u> is required to enable delivery of <u>local need</u> affordable housing (<u>HC-S3</u>) which cannot be made financially viable without it;</p> <p>c) the building is able to accommodate more than one dwelling unit;</p> <p>b) d) it is within a <u>Local Service Centre or a Village named settlement (GP3)</u>;</p> <p>c) e) it is the minimum number of p<u>Principal</u> r<u>Residence</u> market houses required to support the delivery of the required affordable housing to maximise the proportion of affordable homes within viability constraints;</p> <p>f) the affordable dwellings will be occupied by a person(s) with a proven housing need in accordance with HC-S3;</p> <p>d) g) in terms of size and type, the <u>affordable housing and</u> mix of p<u>Principal</u> r<u>Residence</u> market housing, is in accordance with Policy HC-S2;</p>	<p>response to representation 0063/05.</p>

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		<p>e) h) the affordable housing and pPrincipal rResidence market housing will be indistinguishable and will be fully integrated on the development site; and</p> <p>f) i) the affordable housing will be provided broadly in-step with the pPrincipal rResidence housing as development progresses; or</p> <p>j) it is 'Principal Residence' housing in accordance with HC S1 clause 4.</p> <p>3. 4. The National Park Authority will ensure that, whether through a single permission or incremental permissions, the number of affordable dwellings created is that which would have been required if the scheme had been constructed as a single development having regard to the planning unit and previous permissions since the adoption of the March 2005 Local Plan. In the case of the creation of one or more dwellings from a single previous planning unit (whether at once or over a period of time), the development should contribute the maximum number of local need affordable homes consistent with this policy. or in accordance with HC S1, clause 4.</p> <p>4. 5. Where there is reason to believe that the proposal is formulated with a view to circumventing or mitigating affordable housing requirements, including where the National Park Authority considers that a building is able to accommodate more than one dwelling units, its capacity will be re-calculated.</p> <p>5. 6. Where a scheme would provide more affordable homes than are needed in the parish and the adjacent parishes, now and in the near future a financial contribution will be required towards affordable housing needed elsewhere in the National Park in accordance with Policy GP5.</p> <p>6. 7. Proposals for <u>accessible and adaptable</u> specialist housing will be permitted where they accord with HC-D3.</p>	

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		8. Where permission is granted condition(s) will be attached removing permitted development rights in accordance with HC S2 and CE S5.	
259	Page 144, para. 6.101	The 1997 Local Plan restricted open market new build housing within villages to redevelopment sites. This was a response to the high level of open market in-fill housing built during the previous 5-20 years that tended to erode the character of Exmoor's villages. The approach in the 2005 Plan was to prioritise the provision of local needs affordable housing in all settlements through both new build and conversions in order to make the best use of existing buildings, minimise building on greenfield land and help retain vibrant local communities.	To reduce the length and complexity of the plan – part of paragraph relocated to para. 6.6.
260	Page 144, para. 6.102	This Plan continues the approach in settlements of seeking all new build housing to be affordable housing to meet local needs. Given the outstanding character of Exmoor's settlements, new build housing will have to be located and designed so that it conserves or enhances the individual character of each settlement. It is considered that this policy approach has been appropriate in the context of National Park designation and has been successful in delivering new affordable housing through the rural exceptions site approach <u>while minimising new housing especially on greenfield sites to that which is essential so as to maintain a supply of sites for local community needs in the longer term</u>. Between 2005/06 and 2013/14, 83 local need affordable homes were built. ENPA wishes to retain the focus on addressing the community's need for affordable housing. In a designated area with a highly sensitive landscape, with few suitable housing sites, there is a need to minimise new housing especially on greenfield sites to that which is essential. In principle, therefore, it is therefore not considered appropriate to provide for new build cross subsidy housing in Exmoor National Park. so as to maintain a supply of sites for local community needs in the longer term.	To simplify the plan and reduce repetition.
261	Page 144, para. 6.103	However, at the time of drafting, there have been national changes to the way in which affordable housing is funded including <u>Reductions in</u> to housing grant	To update the Plan and for clarification.

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		<p>administered by the Homes and Communities Agency (HCA), together with and the setting of higher 'Affordable Rent' levels for affordable homes as a condition of that funding, have resulted in a greater reliance on private lending for affordable housing schemes which means that, at the current time, it is very difficult for Registered Providers to deliver affordable housing on exception sites. ENPA has therefore taken the difficult decision, while seeking all housing to be for affordable local need, to consider cross subsidy <u>through the minimum number of Principal Residence dwellings</u> where it can be clearly demonstrated that there are no other means of funding a scheme including through cross funding from other schemes in a Registered Provider's programme outside the National Park. In the meantime, the case for realistic levels of grant funding to ensure that the National Park can be protected and ensure local needs affordable housing can be provided without the need for additional cross subsidy housing, will continue to be made.</p>	
262	Page 144, para. 6.104	<p>A key factor in achieving affordable new build housing is to obtain land at the lowest possible value such that it is possible for housing associations, community land trusts and local households to acquire it for the purposes of affordable housing. The impact of the housing policies within this Local Plan based on the rural exceptions approach should be to keep land development values lower than would otherwise be the case. Proposals which include additional housing to help deliver affordable housing schemes, will need to demonstrate that the affordable housing will be owned or controlled by Registered Providers or Community Land Trusts Registered Providers are those social housing providers on the statutory register compiled by the Homes and Communities Agency (or successor agency) which lists private providers, not for profit providers (of whom most are housing associations), for profit providers such as private developers and local authority providers.</p>	To simplify the plan and reduce repetition.
263	Page 143, para. 6.105	<p>Schemes proposing a mix of affordable housing and 'Principal Residence' housing to fund it, will be scrutinised through 'an open book' approach to ensure it can be</p>	To simplify the plan and reduce repetition – the approach to

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		demonstrated that the 'Principal Residence' housing is essential for the viability of the scheme and that it replaces current reductions in public housing grant rather than increasing land value. ENPA will need to be convinced that cross subsidy through 'Principal Residence' housing is the only alternative and there are no other sources of funding. This is because the number of new dwellings on greenfield land should be minimised to that which is necessary to address local housing needs. Higher land values will impact on scheme viability and in the longer term would result in a greater number of houses to deliver the affordable using up suitable housing sites more quickly and reducing the ability to deliver affordable housing for local needs in the National Park in the longer term.	assessing viability is set out in para. 6.42.
264	Page 145, para. 6.106	In terms of Clause 2 a) (ii) of Policy HC-D2, ENPA will expect that any market ('Principal Residence') housing to fund affordable housing proposed in Local Service Centres or Villages will be less than the number of affordable dwellings. This applies the approach set out in the NPPF that planning authorities should consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs. The timing and delivery of the affordable and pPrincipal #Residence housing will be secured through the planning approval.	To update the plan in respect of viability considerations.
265	Page 145, para. 6.107	The only other circumstances in which Principal Residence housing may be permitted is where it is through the redevelopment of a 'Vacant Building(s)' in accordance with HC D2 clause 2 b) and HC S1 clause 4 only. Agricultural buildings and previously developed land without buildings do not come within the definition of 'Vacant Buildings'.	To reflect the judgement in R (on the application of West Berkshire District Council and Reading Borough Council) v Secretary of State for Communities and Local Government [2015] and subsequent change to the PPG.

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266	Page 145, para. 6.108	Where permission is granted, condition(s) will be attached removing permitted development rights in respect of extensions to local need affordable dwellings and dwellings of up to 903sqm in size in accordance with HC-S2 to ensure that the dwellings remain more affordable and contribute to a balanced local housing stock.	90sqm updated to 93sqm to be consistent with the nationally described space standards.
267	Page 146, Policy HC-D2	<p>HC-D2 NEW BUILD DWELLINGS IN SETTLEMENTS</p> <p>1. New build housing development will be permitted in named settlements where:</p> <ul style="list-style-type: none"> a) the site is well related to existing buildings and any development would conserve or enhance the character of the traditional settlement pattern and the character and appearance of the site and its surroundings; and b) it will meet an affordable local need, there is a proven local need for the dwelling(s) and that need cannot be met within the existing housing stock, or from sites/buildings already with planning permission; c) the intended occupants meet the <u>local need occupancy criteria</u> requirements of the local need occupancy criteria which will be secured in perpetuity through a planning obligation in accordance with HC-S3; and d) the dwelling(s) will be affordable by size and type to local people and will remain so in perpetuity in accordance with HC-S2; <p>2. All new build housing must address an identified local need and be affordable with occupation restricted to local people in perpetuity unless, in the named Local Service Centres and Villages, it can be clearly and robustly demonstrated that:</p> <ul style="list-style-type: none"> a) An element of <u>Principal Residence</u> market housing (HC-S4) is required to enable delivery of the <u>local need</u> affordable housing which cannot be 	<p>To simplify the policy. To update the plan in the light of national and changes, to ensure that the approach to delivery is flexible by removing the requirement that, in certain circumstances, the affordable housing will be owned or controlled by a Registered Provider or a community land trust. In respect of (former) clause 2 b) to reflect the judgement in R (on the application of West Berkshire District Council and Reading Borough Council) v Secretary of State for Communities and Local Government [2015] and subsequent change to the PPG.</p> <p>Change in terminology in clauses 3 and 4 to reflect the</p>

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		<p>made financially viable without it. The affordable housing will be owned or controlled by a Registered Provider (including Housing Associations) or a community land trust. The intention will remain the provision of 100% affordable housing to meet an identified local need.</p> <p>b) ii) It is the minimum number of pPrincipal rResidence houses required to support the delivery of the required affordable housing.</p> <p>iii) The affordable dwellings will be occupied by a person(s) with a proven housing need in accordance with the local occupancy definition in HC-S3 and will otherwise accord with this Policy.</p> <p>c) iv) In terms of size and type, the affordable housing and mix of pPrincipal rResidence market housing is in accordance with HC-S2;</p> <p>d) v) The affordable housing and pPrincipal rResidence housing are indistinguishable and fully integrated on the development site; and</p> <p>e) vi) The affordable housing will be provided broadly in-step with the pPrincipal rResidence housing as development progresses.</p> <p>or</p> <p>b) It is 'Principal Residence' housing through the redevelopment of a 'Vacant Building(s)' in accordance with HC-S1 clause 4 only. In such cases, for a building to be considered as Vacant, applicants will need to demonstrate that it is not abandoned and that it has been unoccupied and without content for a minimum of 3 years.</p> <p>3. Proposals for <u>specialist accessible and adaptable</u> housing will be permitted where they accord with HC-D3.</p> <p>4. Where permission is granted for local need or 'principal residence' dwellings or <u>specialist adaptable and accessible</u> housing of up to 930sqm floorspace, a condition will be attached removing permitted development rights in accordance with HC-S2.</p>	<p>Technical Housing Standards – nationally described space standards - proposed to be included in policy HC-S2 A Balanced Housing Stock and in response to representation 0063/06.</p> <p>Change from 90sqm to 93sqm partially responds to representation numbers 0058/14 and 0061/02,</p>

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268	Page 147, para. 6.110	<p>Policy HC-D3 makes provision for specialist <u>accessible and adaptable</u> housing for older people and other vulnerable members of the National Park’s communities <u>who have a proven local connection. Such housing should meet the national standard for accessibility and be capable of adaptation to meet the changing needs of those who live in them. Clause 1 a) of the policy recognises that such housing can meet an affordable need in accordance with policies HC-D1 and HC-D2 and it will be subject to a local occupancy tie. Proposals can also meet a local (though not affordable) need to help meet the needs of Exmoor’s communities, including its ageing population. Consistent with Policy HC-S1, such housing will also help to deliver an identified need for local need affordable housing. This accords with</u> Policy HC-S2 which aims to ensure that the mix in terms of the size, type and tenure of housing permitted in the National Park contributes to that which is needed by local communities. and Policy HC-S1 which makes provision for specialist housing for older people and other vulnerable members of the community.</p>	<p>Change in terminology to reflect and explain of the Technical Housing Standards – nationally described space standards and in response to representation 0063/07. To provide clarification on the local occupancy tie and cross subsidy.</p>
269	Page 147, para. 6.111	<p>National Policy confirms that a focus on affordable housing is appropriate and that authorities and agencies should work together to meet the needs of local communities.³⁰⁸ Planning authorities should be responsive to local circumstances and plan for housing to reflect local needs, and plan for a mix of housing to cater for the needs of older people and people with disabilities (including retirement and specialised housing for those with support or care needs).³⁰⁹ To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Guidance notes the need for housing for older people. Consideration should be given to the size, location and quality of dwellings needed in the future.³¹⁰</p>	<p>To simplify the plan.</p>
270	Page 147, para. 6.112	<p><u>West Somerset and Exmoor National Park have the highest average age in England. On Exmoor, has a higher than average proportion of older age groups</u></p>	<p>To simplify and reduce the length of the plan.</p>

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		<p>with over 65s <u>makeing</u> up nearly one third of the population. <u>West Somerset and Exmoor National Park</u> have the highest average age in England. It is predicted that Exmoor will continue to have a <u>much higher than well above</u> average older population with a high proportion of over 65s households living alone. <u>Within the National Park a significant proportion</u> A quarter of all households with no dependent children include one or more persons with a long term health problem or disability.</p>	
271	Page 147, para. 6.113	<p>The Exmoor National Park in West Somerset SHMA Update assessed the requirement for different types of specialised housing based on the projected growth for older households. It estimated the 2011 requirement to be 138 specialised units of accommodation, with an additional 69 homes for older households, required for the West Somerset area of the National Park 2011-2031. This figure was part of the net overall housing requirement and not additional to it.³¹² Although the 2015 Joint SHMA update provides an updated OAN for Exmoor National Park, the figures indicate the potential need/demand for such housing over the plan period.³¹³</p>	To simplify and reduce the length of the plan. The Housing Topic Paper sets out evidence on the component of projected households with a specialised housing requirement and in response to representation 0058/02.
272	Page 147, footnotes 312 and 313	<p>³¹² Housing Vision (2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset, para. 5.32 and Table 5.15. ³¹³ Housing Vision (2015) Northern Peninsula Strategic Housing Market Assessment Update.</p>	Footnotes deleted due to the proposed deletion of associated text in para. 6.113
273	Page 148, para. 6.114	<p>As people grow older their housing needs often change and homes may become unsuitable with many single elderly residents living in large <u>family houses or housing</u> that are <u>is otherwise</u> not appropriate to their needs. It appears that there are Exmoor households, particularly of older people, living in unsuitable accommodation. Older people, or those with disabilities, may have specialist accommodation needs that are not met by the general housing stock. The National Park Authority recognises the importance of supporting the housing</p>	For clarification.

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		<u>needs of an ageing population and, within the context of National Park designation and other housing policies in this plan, ENPA considers it is important that opportunities should be taken to address the local need for accessible and adaptable housing for older people and other vulnerable members of the community.</u>	
274	Page 148, insert new paragraph after 6.115 - 6.115A	<u>6.115A Policy HC-D13 provides for the creation of smaller units of accommodation through subdivision/adaptation of existing homes. Older people and/or other members of the community who require adapted homes and who have access to appropriate support and finance may, be able to take such measures. The subdivision of homes may provide equity for necessary adaptations or enable a family member to provide support through living next door. An identified need for accessible and adaptable housing may also be addressed through new housing.</u>	For clarification (part of paragraph moved from para. 6.116).
275	Page 148, para. 6.116	The National Park Authority recognises the importance of supporting the housing needs of an ageing population and, within the context of National Park designation and other housing policies in this plan, ENPA considers it is important that opportunities should be taken to address the local need for specialist housing for older people and other vulnerable members of the community. <u>For those in affordable need, this may be through appropriately designed affordable housing with local occupancy ties in accordance with housing policies. Policy HC-S2 requires that encourages all new build housing should enable adaptation to be constructed to accessible and adaptable Building Regulation Requirement M4(2) and requires 20% of dwellings in housing developments of 5 or more dwellings to meet the standard. The intention is to build up a stock of housing which should be suitable for people over their lifetime. This also applies to market (Principal Residence) housing, where it is proposed as an element of a scheme to help to fund affordable housing, and justified in the first instance, by a local need for affordable housing (HC-D1 or HC-D2).</u> Policies also provide for the creation of	For clarification and to reflect change in terminology to reflect and explain the Technical Housing Standards – nationally described space standards and in response to representation 0063/07.

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		smaller units of accommodation through subdivision/adaptation of existing homes. Older people and/or those in need of care and assistance who have access to appropriate support and finance may, through such measures, be able to continue to live in their own homes for longer.	
276	Page 148, para. 6.117	Subdivision of homes may provide equity for necessary adaptations or enable a family member to provide support through living next door. Proposals for subdivision should comply with Policy HC-D14. Where there is no suitable housing within the existing housing stock, including specialised extra care and sheltered housing, or if adaptation/subdivision cannot be achieved then an identified need for specialist housing may be able to be addressed through new housing.	Deleted as part of text moved to para 6.115A and to reflect deletion of clause 1a) of policy HC-D3 in response to representation 0051/06.
277	Page 148, para. 6.118	For those in affordable need, this may be through appropriately designed affordable housing with local occupancy ties in accordance with housing policies. Where there is an identified need for specialist housing and a household would not meet the criteria for affordable housing, any market (principal residence) housing, proposed as an element of a scheme to help to fund affordable housing, and justified in the first instance, by a local need for affordable housing (HC-D1 or HC-D2), should also include specialist housing units. In such cases, the affordable housing element of the scheme is or will be owned or controlled by a Registered Provider or Community Land Trust.	To reduce repetition and reduce the length of the plan (part of the paragraph is included in para. 6.110).
278	Page 148, insert new paragraphs after para. 6.118	<u>6.118A New accessible and adaptable housing should be reasonable in size and evidence indicates that two bedroom housing is likely to be the most needed size.^x The policy, therefore, requires that accessible and adaptable housing should not exceed 93sqm floorspace. Where a specific need for a wheelchair adaptable or accessible dwelling is identified it should be constructed in accordance with Building Regulations Requirement M4(3).</u>	For clarification and change in terminology to reflect and explain the Technical Housing Standards – nationally described space standards and in response to representation 0063/07. Paragraph 6.118B

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		<p><u>6.118B Proposals should accord with CE-S5 and, where they relate to existing traditional buildings, should ensure that any alterations or conversion work do not harm the fabric or character of the building. Accessible and adaptable housing proposals should accord with Policy AC-D3 (Parking Provision and Standards) to ensure that provision is appropriate for the needs of residents.</u></p> <p><i>Insert footnote:</i></p> <p>^X Housing Vision (2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset</p>	<p>moved from paras. 6.122 to 6.123.</p>
279	Page 148-149, para. 6.119 and 6.120	<p>Local needs affordable housing has occupancy ties to ensure it is lived in by people meeting the local occupancy requirements. However, the high external demand for housing in the National Park from older age groups means that there is a likelihood that new ‘Principal Residence’ specialist <u>accessible and adaptable</u> housing, to fund the affordable housing, although of a size and type needed by Exmoor’s communities, could predominantly be bought by older people moving from other parts of the UK, so exacerbating the trend towards an older population. Given the limited availability of suitable housing sites and the competing demands on them to satisfy the needs of local communities, the question of meeting general needs beyond those of the National Park becomes an important issue. Evidence from consultation indicated high support for local needs affordable housing, and support for the principle of local housing.³¹⁵ There was also some support for market and local housing to help deliver affordable housing (and where it could support provision of other housing needed locally, such as for an ageing population).³¹⁶ Policy HC-D3, therefore, provides for <u>accessible and adaptable</u> housing to address a local need for older people’s accommodation where adequate care and assistance cannot be provided within the existing housing stock. Local occupancy ties will be attached to permissions for new specialist housing through the use of planning obligations. In this way,</p>	<p>Paragraphs 6.119 and 6.120 are merged. Reduce the length of the paragraph. Change in terminology to reflect and explain the Technical Housing Standards – nationally described space standards and in response to representation 0063/07.</p>

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		such housing will address the locally arising needs of the National Park's older residents and other vulnerable members of the community in the longer term rather than contributing to a potential increase in older households moving to the area. Viability assessments indicate, where land values remain reasonable, that local housing has the potential to help fund local needs affordable housing. ³¹⁷	
280	Page 149, footnotes 315, 316 and 317	³¹⁸ ENPA (2011) Strategic Options Consultation (2011-12) [Online] Available: http://www.exmoor-nationalpark.gov.uk/ ³¹⁶ Ibid, Question 4. ³¹⁷ Nathaniel Lichfield & Partners (2011) Exmoor National Park Housing Viability Assessment. Dulverton: ENPA.	Footnotes deleted due to the proposed deletion of associated text in para. 6.120
281	Page 149, para. 6.121	Housing providers and developers of two or more affordable homes need to show that they have taken into account the housing needs of the community. This includes the need for specialist housing. Proposals for residential institutions (HC-S7), including specialist accommodation providing care, such as nursing homes, should also provide evidence on the local need for the development.	To reduce repetition as deleted text reflects para. 6.60A.
282	Page 149, para. 6.122	Specialist housing should be specifically designed to meet the needs of older people, generally those of retirement age, and/or other vulnerable members of the community who require care and assistance and whose needs cannot otherwise be met through the existing housing stock. As such it will be subject to additional standards. Proposals should accord with CE S5 and, where they relate to existing traditional buildings, should ensure that any alterations or conversion work do not harm the fabric or character of the building.	To reduce repetition and the length of the plan.
283	Page 149, para. 6.123	New dwellings should be reasonable in size and evidence indicates that two bedroom housing is likely to be the most needed size. ³¹⁸ The policy, therefore, requires that owner occupied, specialist housing should not exceed 90sqm floorspace. In this way, it will contribute to the stock of housing most needed by	To reduce repetition and the length of the plan.

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		Exmoor’s communities and help ensure that land take is minimised given the limited and finite number of suitable housing sites in settlements. The Exmoor Housing SPD will set out in more detail, standards and requirements relating to assessing the need for the size type and tenure of housing and arrangements for cascades for future occupiers. Specialist housing proposals should accord with Policy AC-D3 (Parking Provision and Standards) to ensure that provision is appropriate for the needs of residents.	
284	Page 149, footnote 318	Housing Vision (2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset, Dulverton: ENPA	Footnote deleted due to the proposed deletion of associated text in para. 6.123
285	Page 149, para. 6.124	Evidence for the National Park, indicates that the level of demand from people moving into the area is such that it is reasonable to assume that were people to ‘downsize’ that their previous home would in turn be moved into by older people from other parts of the UK. They would be unaffordable to younger people and families on average local incomes.	To reduce the length of the plan.
286	Page 150, HC-D3	<p>HC-D3 <u>ACCESSIBLE AND ADAPTABLE SPECIALIST HOUSING FOR EXMOOR’S COMMUNITIES</u></p> <p>1. Proposals which address an identified local need or requirement for <u>specialist housing accessible and adaptable homes for older people and/or other vulnerable members of the community who require care and assistance homes that can be adapted to meet their needs over their lifetime</u>, will be permitted where:</p> <p style="padding-left: 40px;">a) it cannot be provided within the existing housing stock, including through the appropriate subdivision and adaptation of existing dwellings in accordance with HC-D14 or from sites/buildings already with planning permission;</p>	Change in terminology to accessible and adaptable housing and clause 1a) iii) to reflect and explain the Technical Housing Standards – nationally described space standards and in response to representation 0063/07. Clause 1 a) deleted in response to representation 0051/06.

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		<p>a) b) proposals for more than one dwelling unit of local needs affordable housing and any pPrincipal rResidence market housing provide for an identified need or requirement for specialist <u>accessible and adaptable housing permitted in accordance with HC-D1 or HC-D2; and where:</u></p> <p>i) <u>the dwelling size is in accordance with HC-S2;</u></p> <p>ii) it it will be integrated into the local community to enable access to required services and facilities;</p> <p>iii) it is built to standards and to a size in accordance with HC-S2 <u>it should be constructed to at least accord with Building Regulations Requirement M4(2) (accessible and adaptable dwellings) or successor regulations, unless a specific need for a wheelchair adaptable or accessible dwelling is identified; in such cases the dwelling should be constructed in accordance with Building Regulations Requirement M4(3) (wheelchair user dwellings) or successor regulations; and</u></p> <p>iv) subdivision, adaptation or conversion work accords with CE-S5.</p> <p>2. A planning obligation will be secured to ensure that the occupancy of specialist <u>accessible and adaptable</u> housing is confined in perpetuity to a local person (and their dependents) who has a minimum period of a total of 10 years permanent residence within parishes in the National Park.</p> <p>3. Where permission is granted a condition will be attached removing permitted development rights in accordance with HC-S2.</p> <p>4. The planning obligation will allow, where properties become vacant, and where no person in need of specialist <u>accessible and adaptable</u> housing, can be found to occupy a property, other persons with a local affordable housing need consistent with HC-S3 to occupy the dwelling.</p> <p>5. The provision of specialist accommodation offering care <u>and assistance</u> through a residential institution, should be in accordance with HC-S7.</p>	<p>Change to ensure accessible and adaptable dwellings should accord with optional Building Regulations Requirement M4(2).</p>

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287	Page 150, para. 6.125	Policy HC-D4 sets out criteria to assess proposals for the re-use of an existing traditional building as a dwelling for ‘ e Extended f Family’. The intention of the policy is to provide appropriate opportunities for the re-use of an existing traditional building to enable families to provide support for each other by living close by. This is considered particularly important to support local communities given Exmoor’s ageing population.	To ensure consistency.
288	Page 150, para. 6.126	In accordance with Policies including CE-S5, proposals will have to be sensitively designed and lead to an enhancement of the immediate setting to conserve the character of the building and the landscape of the National Park and to enable the family to provide support. Policy HC-D4, therefore, requires that ‘ e Extended f Family’ d Dwellings will only be acceptable through the re-use of an existing traditional building within the curtilage of a dwelling in a settlement identified named in GP3 (a Local Service Centre or a Village) or where there is an existing dwelling in a farmstead, and not in isolated locations.	To ensure consistency.
289	Page 150-151, para. 6.127	Clause 2 <u>3</u> of the policy requires the occupants to be ‘immediate family’ as a direct descendent or antecedent i.e. children, parents, grandparents, or great grandparents. Occasionally, relatives who do not meet the definition of immediate family may be considered where they are a dependent relative with an essential need to live close to another person because of age, family or medical reasons. In all cases, the occupier of the associated existing dwelling or the new dwelling should have a local connection of 10 years or more residence in the parish or adjoining parish. This reflects the National Park Authority’s statutory duty to <u>Exmoor’s local communities</u> , and will provide additional housing choice for <u>them</u> . Exmoor’s local communities .	To ensure the text is consistent with the Policy and for clarification.
290	Page 151, para. 6.128	Where permission is granted for <u>the change of use to residential re-use for an</u> ‘ e Extended f Family <u>d</u> dwelling, occupancy will be controlled through a local occupancy tie.	For consistency.

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291	Page 151, HC-D4	<p>HC-D4 EXTENDED FAMILY DWELLINGS CRITERIA</p> <ol style="list-style-type: none"> 1. An extended family dwelling will only be permitted through the change of use of an existing traditional building in accordance with CE-S5 and in close association with an existing dwelling: <ol style="list-style-type: none"> a) in settlements within the curtilage of an existing dwelling; or b) a farmstead within an existing group of buildings. 2. <u>The dwelling size will be in accordance with HC-S2.</u> 3. 2 Extended family dwellings, will be occupied by a person(s) (and their dependents) who can demonstrate that: <ol style="list-style-type: none"> a) the occupier of the associated existing dwelling or the new dwelling has a minimum period of 10 years or more in the last 2<u>30</u> years permanent and continuous residence in the parish or an adjoining parish; and b) they are immediate family by virtue of being a direct descendent or antecedent of the permanent occupier of the associated existing dwelling; or c) exceptionally, they are a dependent relative who has an essential need to live close to another person, the need arising from age, family or medical reasons. 4. 3 A planning obligation will be secured to ensure that the intended occupants meet the requirements of the extended family occupation in this policy and to tie the dwelling(s) to the main house to ensure that they are not sold off separately. 5. 4 The variation of a planning obligation which restricts the occupancy of an extended family dwelling as set out in this policy will only be permitted where the occupancy of the dwelling is limited by agreement to local persons as defined in HC-S1 and HC-S3, or as a holiday let where the proposal is in accordance with HC-D12<u>3</u>. 	For consistency.

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		6. 5. Where permission is granted, a condition will be attached removing permitted development rights in accordance with HC-S2.	
292	Page 151-152, para. 6.129	The Government defines custom build housing as either a builder being contracted by a home owner to create a ‘custom built’ home or where a private individual builds their own home as a ‘self-build’. It wants to enable more people to build their own home. ³¹⁹ Surveys of local residents should be considered to assess local housing need for this type of housing, and a local list or register compiled of people who want to build their own homes. ³²⁰ Exmoor and Dartmoor National Park Authority ies have <u>has</u> established <u>local registers of people, including local people, interested in self-build or custom build as part of a joint ‘Right to Build’ Vanguard project.</u> ³²¹ The register will be used to help identify and address the local need for affordable housing from those who work and <u>have a longstanding residency local connection</u> in the National Park in line with Policy HC-S1 and other housing policies in this plan. <u>Potential sites can be on greenfield or brownfield land, including the conversion/change of use of existing buildings.</u> Some sites have been assessed through the SHLAA process, and will <u>would</u> be considered for self-build schemes. As part of the Vanguard Project, landowners have also been invited to suggest sites or buildings which are suitable for new build self-build housing or for housing through conversions.	To update the plan and for clarification.
293	Page 152, para. 6.130	Custom or self-build housing can be achieved by a household in different ways: a) Self-build: being physically involved in part or all of the construction of one’s own home; b) Self-finish: taking on a property which is structurally complete, and finishing the building oneself; c) Community self-build: being physically involved in part of all of the construction of one’s home, as part of a wider scheme on one site;	To simplify the plan.

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		d) Custom build - where a house builder offers a serviced building plot and may also provide a design and build service to create the home.	
294	Page 152, para. 6.131	Exmoor National Park Authority has a strong track record in helping to deliver affordable housing for local people. A number of individuals have converted an existing building, or had a new home built recognising that self/custom build can be a more affordable way of owning a home <u>so can be of benefit to first time buyers, including starter homes for younger people, and to achieve enabling more control over design and sustainability. Policy CE-S6 sets out sustainable construction and design principles.</u> This form of housing can include single homes on small plots, as well as community self-build projects. The 2005 plan did not prescribe tenure but instead ensured that a All new build housing <u>will</u> remain more affordable in perpetuity through a local need occupancy tie and upper size limit., an approach continued in this plan.	To update the plan in the light of national changes regarding self-build and for clarification.
295	Page 152, insert new paragraph after 6.131	<u>6.131A Experience of implementing the housing policies in the 2005 Plan has shown that there may be opportunities for Housing Providers to provide serviced self-build plots, for example as part of a larger scheme. ENPA will work with partners, including local communities, who may wish to consider ways in which households can be assisted to provide homes, including site preparation and provision of services for self/custom build. There is growing interest in the potential for community land trusts to initiate affordable housing schemes and this may be able to achieve mixed schemes including, for example, local need custom/self- build housing to address the range of needs within a community.</u>	To update the plan including in the light of national changes and to reflect the flexible approach to delivery of affordable housing.
296	Page 152, para. 6.132	Policy HC-D5 seeks to encourage custom/self-build housing where it will meet an identified local affordable housing need. Custom/self-build housing proposals will be considered in named settlements (GP3) in accordance with either Policy HC-D1 (conversions to dwellings in settlements) or HC-D2 (new build dwellings in settlements). Where the requirements of this and other policies in the plan are	To simplify the plan.

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		<p>met, Policy HC-D5 also extends the principal of custom/self-build to rural communities to provide for opportunities to have for small scale development to address the needs of their a community for affordable housing. Rural communities are very small communities in the open countryside. <u>They are</u> not identified in the settlement <u>hierarchy strategy, and are</u> defined as those which have service provision in the form of a shop, public house or a community meeting place/hall and therefore considered to be appropriate locations for self-build opportunities to meet local affordable housing needs. At the time of drafting these are Allerford, Countisbury, Hawkridge, Heasley Mill, Kentisbury, Luccombe, Martinhoe, Oare/Malmsmead, Selworthy, Twitchen, West Porlock and Withycombe.</p>	
297	Page 153, HC-D5	HC-D5 CUSTOM/SELF BUILD LOCAL NEED HOUSING IN RURAL COMMUNITIES	For clarification. Delete part of title as policy also provides for self/custom build housing in settlements.
298	Page 153, para. 6.135	<p>THE CHANGE OF USE OF SERVICED ACCOMMODATION TO HOUSING</p> <p>Policy RT-D3 sets out the criteria to be satisfied for proposals for the change of use of existing serviced accommodation. Where proposals relate to a part or complete change of use to housing, Policy HC-D6 below will apply. In the first instance, the requirements of Policy RT-D3 should be satisfied. In considering proposals for the change of use to housing, the intention will remain the provision of 100% affordable housing. For proposals within Local Service Centres and Villages (GP3), Policy HC-D1 will apply. Outside these areas, an element of ‘Principal Residence’ housing may be permitted where it accords with the criteria in the policy. This will be either that it is required for reasons of financial viability to enable delivery of the affordable housing or, where a scheme would provide more affordable homes than are needed in the parish / adjoining parishes, a financial contribution will be required towards affordable housing needed</p>	To reflect the deletion of Policy HC-D6 following the judgement in R (on the application of West Berkshire District Council and Reading Borough Council) v Secretary of State for Communities and Local Government [2015] and subsequent change to the PPG. The change of use of serviced accommodation will be considered against policy RT-D3 which was the position in

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		elsewhere in the National Park. In all cases, the 'Principal Residence' housing will be the minimum number to support the delivery of the affordable housing.	the draft plan before the national thresholds for affordable housing were announced.
299	Page 154, Policy HC-D6	<p><u>HC-D6 THE CHANGE OF USE OF SERVICED ACCOMMODATION TO HOUSING</u></p> <p>1. Proposals for the change of use of serviced accommodation to dwelling(s) will only be considered where the requirements in RT-D3 are satisfied. The intention, through the change of use will remain the provision of 100% affordable housing to meet an identified local need.</p> <p>2. In the Local Service Centres and Villages, proposals will accord with HC-D1.</p> <p>3. Outside the Local Service Centres and Villages, an element of principal residence market housing in accordance with HC-S4 may only be permitted where:</p> <p style="padding-left: 20px;">a) the proposal meets the requirements of CE-S5;</p> <p style="padding-left: 20px;">b) it is clearly and robustly demonstrated that it is required to enable delivery of affordable housing which cannot be made financially viable without it;</p> <p style="padding-left: 20px;">c) the building is able to accommodate more than one dwelling unit;</p> <p style="padding-left: 20px;">d) it is the minimum number of principal residence market houses required to support the delivery of the required affordable housing and to maximise the proportion of affordable homes within viability constraints;</p> <p style="padding-left: 20px;">d) the affordable dwellings will be occupied by a person(s) with a proven housing need in accordance with HC-S3;</p>	To reflect the judgement in R (on the application of West Berkshire District Council and Reading Borough Council) v Secretary of State for Communities and Local Government [2015] and subsequent change to the PPG. The change of use of serviced accommodation will be considered against policy RT-D3 which was the position in the draft plan before the national thresholds for affordable housing were announced.

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		<p>e) in terms of size and type, the affordable dwellings and the mix of principal residence market housing is in accordance with HC-S2;</p> <p>f) the affordable housing and principal residence market housing will be indistinguishable and will be fully integrated on the development site; and</p> <p>g) the affordable housing will be provided broadly in step with the principal residence housing as development progresses.</p> <p>2. The National Park Authority will ensure that, whether through a single permission or incremental permissions, the number of affordable dwellings created is that which would have been required if the scheme had been constructed as a single development having regard to the planning unit and previous permissions since the adoption of the March 2005 Local Plan. In the case of the creation of more than one dwelling from a single previous planning unit (whether at once or over a period of time) the development should contribute the maximum number of local need affordable homes consistent with this policy.</p> <p>3. Where there is reason to believe that the proposal is formulated with a view to circumventing or mitigating affordable housing requirements, including where the National Park Authority considers that a building is able to accommodate more than one dwelling unit, its capacity will be re-calculated.</p> <p>4. Where a scheme would provide more affordable homes than are needed in the parish and the adjacent parishes, now and in the near future, a financial contribution will be required towards affordable housing needed elsewhere in the National Park in accordance with GP5. Any housing which may be permitted to deliver the required affordable housing should</p>	

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		<p>be principal residence housing (HC-S4) and will be the minimum number required to support the delivery of the affordable housing.</p> <p>5. Where permission is granted, condition(s) will be attached removing permitted development rights in accordance with HC-S2 and CE-S5.</p>	
300	Page 155, para. 6.136	National guidance states that housing should be located where it will enhance or maintain the vitality of rural communities and that new isolated homes in the countryside should be avoided. Policies in this Plan therefore focus new build housing in the settlements identified <u>named</u> in Policy GP3.	For consistency.
301	Page 155, para. 6.137	<i>Change policy reference numbering:</i> Policies HC- D7 <u>D6</u> and HC- D&D7	Numbering changed due to deletion of policy HC-D6.
302	Page 155, para. 6.138	Justifying a new home outside of a settlement, in the open countryside depends on the essential functional and financially sound needs of an enterprise for full-time employees to live at their place of work. Normally, this will be full-time agricultural workers, as forestry employment based upon contract labour, is often less locationally fixed. Dwellings for rural workers in the open countryside, whether through a conversion or for a new build dwelling, will therefore require the submission of an independently prepared appraisal to accompany an application. This will need to justify an essential functional need and the long-term financial viability of the business for any accommodation, with a requirement that the worker(s) need to be readily available at most times, day and night for most of the year, and bearing in mind current and future business requirements. <u>The requirement for an evaluation of financial viability is part of an appropriate framework that is necessary to demonstrate the essential need for a new dwelling in the open countryside within the National Park.</u> Where there is any doubt as to the permanent need for the dwelling, or the financial viability of the business is marginal, then temporary permission may be given for a residential caravan in accordance with Policy HC- D11 <u>D10</u> .	Point of clarification. Policy numbering changed due to deletion of policy HC-D6.

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303	Page 155, para. 6.139	<p>Rural worker dwellings are required to be 903sqm or less. Exceptionally, a dwelling larger than 903sqm may be permitted <u>where it is justified by the needs of the business</u>, for example to accommodate a farm office. This will be considered where the dwelling is the principal or only dwelling on a holding. In such cases, the upper size limit of the dwelling will be 120sqm <u>124sqm</u>.^x</p> <p><i>Insert footnote:</i></p> <p>^x <u>DCLG (2015) Technical Housing Standards – nationally described space standard</u></p>	<p>For clarification and to reflect the Technical Housing Standards – nationally described space standards and in response to representation 0063/10.</p>
304	Page 155, para. 6.140	<p>Policy HC-D9 <u>D8</u> sets out criteria for assessing applications for housing in the open countryside for rural workers in agriculture, forestry or other rural land based enterprises. Proposals for both the conversion of existing buildings to dwellings (HC-D7 <u>D6</u>) or proposals for new build housing (Policy HC-D8 <u>D7</u>) for rural workers will need to accord with Policy HC-D9 <u>D8</u> or for sSuccession fFarm workers policy HC-D10 <u>D9</u>. A rural worker in agriculture, forestry or other land based rural enterprise operating in the locality will need to be a worker who is engaged in actual physical work, actively contributing to the management of the land and justifying the need for a new home in that location. This is because non-physical work, although it may be associated with the business, can be achieved away from the enterprise and such cases will not meet the exceptional tests needed to justify a new home in the open countryside (see Annex 2 to this Plan). Proposals for housing for workers in the open countryside who are not employed in agriculture, forestry or other rural land based enterprises will be considered through the reuse of existing buildings for local need affordable housing in accordance with Policy HC-D7 <u>D6</u> and the local occupancy criteria in Policy HC-S3 clause 1 e) where they need to live close to their place of work or they meet the criteria of an Exmoor worker. The definition of an Exmoor worker and further guidance will be set out in the Exmoor Housing SPD.</p>	<p>To reflect deletion of HC-D6 and changes to subsequent policy numbering and simplify the plan.</p>

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305	Page 156, para. 6.141	The conversion of buildings in the open countryside to provide accommodation helps to reduce demand for further house building elsewhere on greenfield sites. Policy HC- D7 <u>D6</u> provides for the conversion of existing buildings to dwellings for the essential functional need for a rural worker (as above) and as local need dwellings. It also makes provision for ‘ e Extended f Family’ accommodation or for ‘ s Succession f Farming’. Where permission is granted for residential re-use for local needs, Policy HC- D7 <u>D6</u> requires that occupancy will be controlled through planning obligations in the same way as conversions within settlements. For rural (or s Succession f Farm) workers, occupancy will be controlled through occupancy conditions consistent with the approach for a new build dwelling in the open countryside). The requirements for initial and subsequent occupiers of such dwellings are set out in Annex 2 of this Plan	For consistency.
306	Page 156, para. 6.142	Policy HC- D7 <u>D6</u> sets out criteria on the different locational requirements which will apply in each case depending on the proposed occupier. The building will need to be located: <ul style="list-style-type: none"> a) for local need accommodation, in a hamlet or farmstead where there is an existing dwelling; b) for ‘eExtended fFamily’ accommodation, in a farmstead within an existing group of buildings, and in close association with an existing dwelling; c) for rural worker or sSuccession fFarm dDwellings, well related to existing buildings on the holding such that the dwelling and farm buildings operate as a single entity. 	To reflect deletion of HC-D6 and changes to subsequent policy numbering and for consistency.
307	Page 156, para. 6.143	Proposals for new build rural worker or s Succession f Farm d Dwellings will need to accord with HC- D8 <u>D7</u> and be well related to existing buildings on the holding such that the dwelling and farm buildings operate as a single entity. Considerations will include whether there is a joint access. Ensuring that the proposal relates well to existing buildings can also provide other benefits such as increased security through ‘natural surveillance’	To reflect deletion of HC-D6 and changes to subsequent policy numbering and for consistency.

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308	Page 156, para. 6.144	<i>Capitalization: ‘eExtended fFamily’- dDwellings’</i>	For consistency.
309	Page 156, para. 6.145	<i>Capitalization: Policy CE-S5</i>	For consistency.
310	Page 156, para. 6.146	In considering proposals for <u>a new build dwelling</u> for a rural worker through Policy HC- D8 <u>D7</u> , the National Park Authority will need to be satisfied that there is no existing accommodation potentially available (or which has recently been sold which could have met the needs), or that the conversion/change of use of existing buildings or a temporary caravan is <u>are</u> not a viable alternative. Where necessary, the National Park Authority will attach a condition to any other existing dwelling(s) on the holding, restricting the occupancy to those engaged in agriculture, forestry or other business. Exceptionally, planning obligations may also be attached tying the dwelling to the holding or business to ensure that dwellings are not disposed of separately from the business as a whole. Such cases may include where there is a history of fragmentation of the farm holding leading to new agricultural workers dwelling(s). It is considered there may be occasions where this is can be justified to conserve the National Park and/or its special qualities.	To correct a grammatical error and to reflect deletion of HC-D6 and changes to subsequent policy numbering.
311	Page 157, para. 6.147	Proposals for r <u>Residential</u> development associated with a low impact sustainable or environmental land based lifestyle (which can also be known as ‘One Planet Development’), and <u>Proposals for such development</u> , which may include temporary structures such as traditional ‘benders’ or yurts constructed of natural materials for which no conventional foundations are required, will be considered in terms of whether they are in accordance with the policies in this plan. These include the Spatial Strategy (Policy GP3), housing, landscape character and design policies.	For clarification.

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312	Page 157, para. 6.148	<i>Change policy reference numbering: HC-D7 <u>D6</u> and HC-D8 <u>D7</u></i>	To reflect deletion of HC-D6 and changes to subsequent policy numbering.
313	Page 157, para. 6.149	Applications to remove agriculture or rural worker occupancy ties will be carefully assessed. In the case of s Succession f Farm d Dwellings permitted under Policy HC- D10 <u>D9</u> , it may be occupied by other rural workers when the dwelling becomes vacant. When the exceptional need for this type of home no longer exists it can contribute to the provision of local need including intermediate or “more affordable” housing or where a need cannot be identified, holiday let accommodation. Policies in this plan set out the criteria to be met in such cases.	For consistency and to reflect deletion of HC-D6 and changes to subsequent policy numbering.
314	Page 157, policy HC-D7	HC-D67 CONVERSIONS TO DWELLINGS IN THE OPEN COUNTRYSIDE	Numbering changed due to deletion of policy HC-D6.
315	Page 158, policy HC-D8	<p>HC-D78 NEW BUILD DWELLINGS IN THE OPEN COUNTRYSIDE</p> <p>1. New dwelling(s) in the open countryside will only be permitted where:</p> <p>a) the accommodation is designed to meet a proven need for a rural worker in accordance with HC-D89 or succession farm worker in accordance with HC-D910 that cannot be met:</p> <ul style="list-style-type: none"> i. within the existing housing stock including through the subdivision of an existing dwelling, from sites/buildings already with planning permission; or ii. through the provision of a temporary residential caravan in accordance with HC-D101; or iii. the conversion/change of use of an existing building in accordance with CE-S5 and HC-D67; <p>b) the dwelling is well related to existing buildings on the holding such that the dwelling and farm buildings operate as a single entity; and</p>	Numbering changed due to deletion of policy HC-D6 ad to correct drafting error in cross reference in clause 1 c). Terminology changed to be consistent with nationally described space standards.

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		<p>c) the design and layout of the development meet the requirements of CE-S6 and the net floorspace <u>gross internal area</u> will be in accordance with HC-D6 <u>D8</u> or HC-S2 as appropriate.</p> <p>2. Where permission is granted a condition will be attached removing permitted development rights in respect of extensions.</p> <p>3. Where permission is granted for a new dwelling on an agricultural or forestry holding that has an existing dwelling(s) under the control of the applicant which needs to be used in connection with the enterprise, a condition will be attached to ensure that the occupancy of any existing dwelling(s) is also limited to persons able to demonstrate a proven essential need for that accommodation.</p>	
316	Page 158, policy HC-D9	<p>HC-D89 RURAL WORKERS</p> <p>1. New housing to meet the needs of rural workers in the open countryside will only be permitted in accordance with HC-D67 or HC-D78 and where:</p> <p>a) it is justified by a proven essential functional need for a full time rural worker in agriculture, forestry or other rural land based enterprises to live permanently at or near their place of work;</p> <p>b) in the case of agriculture or other rural land based enterprises, the business is proven to be financially viable in the long term, it is extensive in nature, the land management activity contributes to the conservation or enhancement of the natural beauty and wildlife of the National Park and is in accordance with the tests set out in Annex 2 of this Plan;</p> <p>c) where the need for a dwelling is proven, a planning condition will be attached to ensure that occupancy of the dwelling(s) is confined to a rural worker in agriculture, forestry or <u>another rural land based rural land</u> enterprise operating in the locality; and in accordance with clause 1, a) above; and</p>	<p>Numbering changed due to deletion of policy HC-D6. To correct drafting errors and delete unnecessary cross reference within policy in clause 1 c). Clause 1 d) change to 93 sqm to reflect the Technical Housing Standards – nationally described space standards and in response to representation 0063/10. Also partially responds to representation 0058/17</p>

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		<p>d) the net floorspace gross internal area will be 90-93sqm or less unless the Authority is satisfied that a larger dwelling is required in which case, the size of the dwelling will be commensurate with the needs of the holding, it can be sustained by the farm business and it would be affordable for the essential need in perpetuity.</p>	
317	Page 159, para. 6.150	<p>Consultation indicated support for the re-use of existing buildings to provide for Succession Farming.³²² There is evidence that there is an ageing farming population on Exmoor. To encourage younger people to manage farm businesses, a second dwelling may be considered on established farms that are financially sustainable where the criteria for a full time worker as set out in Policies HC-D8 D7 (new build housing in the open countryside) and HC-D9 D8 (Rural Workers) cannot be fully satisfied. To satisfy the terms of the policy it will be required that the proposal accords with Annex 2 of this Plan; and:</p> <ul style="list-style-type: none"> a) there are secure and legally binding arrangements in place to demonstrate that the farm business is jointly held, including by a person younger than the person currently responsible for management, or management of the farm business has been transferred to a person younger than the person currently responsible for management, or, that transfer of management is only conditional upon grant of planning permission for the dwelling. The younger person should demonstrate majority control over the farm business and be the decision maker for the farm business; or <u>and</u> b) there is an existing functional need for an additional 0.5 or more of a full time worker; c) the enterprise and activity concerned has been established for at least three years and both the enterprise and the business need for the job, are financially sound, being profitable for at least one of them with a clear prospect of remaining so for a reasonable period of time. Evidence of actual or potential economic performance will be required. To assess economic 	For consistency and to reflect deletion of policy HC-D6 and changes to subsequent policy numbering. To clarify the size of the dwelling and delete unnecessary text.

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		<p>sustainability it will be necessary to show the business has a reasonable prospect of providing a market return for all operators for the amount of management and manual labour inputs, including the job for which the rural enterprise dwelling is being sought, for at least five years from the anticipated completion of the proposed development. This should be assessed on the basis of what is a realistic income for the skills of the operator. <u>Policy HC-S2 requires that dwellings will be 93sqm or less in size. A financial test is also necessary to assess the size of dwelling which the enterprise can afford to build and maintain. The requirements of the enterprise rather than of the owner or occupier will determine the size of dwelling that is appropriate. Dwellings which are unusually large in relation to the needs of the enterprise, or unusually expensive to construct in relation to the income it can sustain in the long term, will not be permitted.</u></p> <p>d) the functional need could not be fulfilled by another dwelling or by converting an existing suitable building, or any other existing accommodation;</p> <p>e) It must also be demonstrated that the management successor or part time worker is critical to the continued success of the farm business, and that the need cannot be met in any other reasonable way, e.g. through the re-organisation of labour responsibilities.</p>	
318	Page 159-160, para. 6.151	<p>In considering proposals, ENPA will need to be satisfied that there is no existing accommodation including through the extension and/or subdivision of an existing dwelling or through the conversion/change of use of existing buildings (or any of these have recently been sold which could have met the need) or the use of a temporary caravan that can be used to meet the needs of a resident worker. ENPA may investigate the history of the enterprise to establish the recent pattern of use of land and buildings (a sale may constitute evidence of lack of need) and why labour or residential arrangements cannot be re-organised to ensure that the</p>	To delete unnecessary text.

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		existing accommodation meets the needs of the enterprise without the need for a further dwelling.	
319	Page 160, para. 6.152	<i>Capitalization: s</i> S <i>uccession f</i> F <i>arm d</i> D <i>wellings</i>	For consistency.
320	Page 160, policy HC-D10	<p>HC-D9<u>10</u> SUCCESSION FARMING – SECOND DWELLINGS ON ESTABLISHED FARMS</p> <p>1. New housing to meet the needs of succession farmers in the open countryside will be in accordance with HC-D6<u>7</u> or HC-D7<u>8</u>. A new second dwelling <u>on a single farm holding</u> within the open countryside will only be permitted where:</p> <p style="margin-left: 20px;">a) the accommodation is designed to meet an existing proven functional need for an additional 0.5 or more of a full time agricultural worker to live permanently at their place of work on an established enterprise;</p> <p style="margin-left: 20px;">b) the business is proven to be financially viable in the long term, it is extensive in nature and where the farming activity contributes to the conservation or enhancement of the natural beauty and wildlife of the National Park and is in accordance with the tests set out in Annex 2 of this Plan;</p> <p style="margin-left: 20px;">c) a planning obligation will require that there are secure and legally binding arrangements in place to demonstrate that:</p> <p style="margin-left: 40px;"><u>i.</u> the farm business is jointly held; or</p> <p style="margin-left: 40px;"><u>ii.</u> management of the farm business has been transferred to a person younger than the person currently responsible for management; or</p> <p style="margin-left: 40px;"><u>iii.</u> that transfer of management will take place on planning permission being granted for the dwelling;</p> <p style="margin-left: 20px;">d) the need cannot be met in any other way including through the re-organisation of labour responsibilities;</p>	Numbering changed due to deletion of policy HC-D6. Change to clause 1 and layout of clause 1 c) for clarification.

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		<p>e) the design and layout of the development meet the requirements of Policy CE-S6 and the net floorspace <u>gross internal area</u> will be in accordance with HC-S2; and</p> <p>f) a planning condition is attached to ensure that occupancy of the dwelling(s) is confined to rural workers in accordance with Policy HC-D89.</p> <p>2. The policy will apply only to a single additional succession farm dwelling to be attached to an established farm after adoption of this Plan. Permission will not be granted for subsequent succession farm dwellings on the holding.</p>	
321	Page 161, para. 6.154	<i>Capitalization: pPolicy RT-D8</i>	For consistency.
322	Page 161, para. 6.155	The siting of mobile homes or static caravans on a temporary basis should be closely located to existing buildings relating to the land based business. as <u>This will form part of the functional need to demonstrate that</u> as it will need to be demonstrated that workers will need to be readily available to attend to the <u>needs of the</u> business at most times. Specific consideration will be given to the visual impact of the structure and its potential impacts on landscape character and nature conservation interests. Applicants should therefore submit a landscaping scheme as part of any proposal to demonstrate how the structure can be effectively screened and impacts on the surrounding landscape character minimised (CE-D1 Protecting Exmoor’s Landscapes and Seascapes). Siting should also take account of access and parking requirements, connection to utility services and avoidance of flood risk.	For clarification.
323	Page 161, policy HC-D11	HC-D101 RESIDENTIAL CARAVANS <i>Change policy reference numbering in clause 2: pPolicy HC-D9 <u>D8</u></i>	Numbering changed due to deletion of policy HC-D6.
324	Page 162, para. 6.160	Existing dwellings permitted prior to the adoption of the Local Plan with an agricultural or forestry worker condition / planning obligation will be permitted to	Correction to cross-reference (note this reference will

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		alter the occupancy condition or vary the planning obligation to include rural workers, as defined in paragraph 6.140 Annex 2 Rural Land Based Worker Dwellings, where the Authority considers the reasons for replacing the existing occupancy tie to be acceptable (i.e. where there is no longer an identified need on that holding). This may allow some flexibility in relation to the range of rural workers that are linked to rural land-based enterprises including circumstances where the nature of the rural land-based enterprise has changed.	change if the proposed changes are accepted)
325	Page 162, para. 6.161	<i>Capitalization (twice within the paragraph):</i> ‘Succession #Farming’	For consistency.
326	Page 162, para. 6.162	<i>Change policy reference numbering:</i> HC-D14 <u>D13</u>	Numbering changed due to deletion of policy HC-D6.
327	Page 163, policy HC-D12, clause 1	HC-D112 REPLACEMENT OF RURAL WORKERS OCCUPANCY CONDITIONS 1. Proposals for the alteration of a condition, or variation of a planning obligation, which restricts the occupancy of a dwelling to a person employed, or last employed, in agriculture or forestry (permitted prior to the adoption of the Local Plan) to include the occupancy of a dwelling by a rural worker (as defined in Annex 2) employed in the locality will be permitted where the need has become redundant on that holding.	Numbering changed due to deletion of policy HC-D6. Grammatical correction to clause 1 (commas). Deletion of cross reference.
328	Page 163, para. 6.164	Given that one of the key objectives of housing provision is to minimise new build housing development on greenfield land, by re-using existing buildings, there is an opportunity to utilise the resource of those buildings converted as holiday lets, to provide accommodation for local people in affordable housing need. This may be of particular value in the open countryside, where most holiday lets have been permitted historically, and because a large proportion of Exmoor’s workforce is based on part-time employment (33% of people in employment work part time). ³²³ This approach, presents an opportunity for a local need affordable	Numbering changed due to deletion of policy HC-D6. Grammatical corrections (commas).

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		dwelling where the tests for new-build housing under p Policies HC- D9 <u>D8</u> Rural Workers or HC- D10 <u>D9</u> Succession Farming cannot be met.	
329	Page 164, para. 6.165	For holiday-lets subject to a holiday occupancy condition, a flexible approach to accommodate local housing needs will be taken to accommodate the replacement of holiday occupancy conditions with an agreement which will limit the occupancy to persons: <ul style="list-style-type: none"> a) in affordable housing need who meet the local occupancy criteria in policy HC-S3 and where the location accords with <u>p</u>olicy HC-D1 Conversions to Dwellings in Settlements or HC-D7 <u>D6</u> Conversions to Dwellings in the Open Countryside; or b) who meet the criteria for ‘eExtended fFamily’- dDwellings in policy HC-D4 Extended Family Dwellings. 	Numbering changed due to deletion of policy HC-D6. For consistency.
330	Page 164, para. 6.166	Additionally, for those dwellings permitted as e Extended f Family homes <u>Dwellings</u> in accordance with policy HC-D4, permission may be granted to vary the occupancy to persons in affordable housing need who meet the local occupancy criteria in <u>p</u> olicy HC-S3, or, where the requirements of <u>p</u> olicy RT-D4 (Non-Serviced Accommodation) are met, the occupancy may be limited to short-term holiday occupancy.	For consistency.
331	Page 164, para. 6.167	<i>Capitalization: e</i> Extended <i>f</i> Family	For consistency.
332	Page 164, policy HC-D13	HC-D123 REPLACEMENT OF HOLIDAY OCCUPANCY CONDITIONS AND EXTENDED FAMILY TIES	Numbering changed due to deletion of policy HC-D6.
333	Page 165, para. 6.169	<i>Change to floorspace from 90sqm to 93sqm.</i>	Change as a result of technical housing standards (nationally described space standards).

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Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
334	Page 165, para. 6.174	Dwellings with an agricultural, rural worker, or s Succession f Farming occupancy tie are permitted in the open countryside as an exception and therefore will only be permitted to subdivide to create a new unit of accommodation where the occupancy of the new dwelling unit is for a proven need for a rural worker in accordance with HC-D9 D8 , for a 's Succession f Farming- e Dwelling in accordance with HC-D10 D9 or where the additional unit(s) created will have a local affordable occupancy tie (HC-S3 Local Occupancy Criteria).	Numbering changed due to deletion of policy HC-D6. For consistency.
335		<p>HC-D134 SUBDIVISION OF EXISTING DWELLINGS</p> <ol style="list-style-type: none"> 1. Proposals for the subdivision of existing residential dwellings will be permitted where: <ol style="list-style-type: none"> a) there would be no adverse impact on the character of the area, amenity of neighbouring occupiers, or highway safety; b) any necessary alterations will not adversely affect buildings of historic and/or architectural merit (CE-S4, CE-D3); and c) any additional units created will be pPrincipal rResidence housing and subject to a condition limiting its occupancy to a person as their only or principal home (HC-S4). 2. Where a property has a local affordable occupancy tie, any subdivision would require that the new unit(s) created would retain the same occupancy restriction. 3. Proposals to subdivide a dwelling with a rural worker or succession farming occupancy tie will only be permitted where: <ol style="list-style-type: none"> a) the additional unit(s) created will be occupied in accordance with HC-S3 Local Occupancy Criteria; or b) the additional unit(s) created will be occupied in accordance with the requirements for HC-D89 Rural Workers Dwelling or HC-D910 Succession <u>Farming</u>. 	Policy numbering changed due to deletion of policy HC-D6. For consistency. Additional clause 4: point of clarification

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		4. <u>Where permission is granted a condition will be attached removing permitted development rights in accordance with HC-S2.</u>	
336	Page 166, para. 6.178	Extensions for dwellings that are subject to an occupancy tie to ensure they meet the local community's need for affordable (or more affordable housing) <u>will be very carefully considered not be permitted</u> where they would exceed 9093sqm net internal floorspace <u>gross internal area</u> . This is because such homes have been permitted to provide an opportunity for local people, <u>who would otherwise be</u> unable to afford to buy a home on the open market, to build their own owner-occupied homes. Together with the local need occupancy tie, the size of these dwellings ensures that these homes remain more affordable for local people in perpetuity.	To reflect changes to the policy. Change to 93 sqm as a result of technical housing standards (nationally described space standards) and for clarification regarding the deletion of clause 2.a) of policy HC-D145 Residential Extensions (see below).
337	Page 167, para. 6.180	Extension proposals exceeding 35% will only be justified if it can be demonstrated that the extension would significantly enhance the character and appearance of the existing dwelling and its surroundings, and is clearly of the highest quality in terms of its construction and design; or if the extension is a conversion scheme of an existing building that is clearly demonstrated to be within the domestic curtilage <u>adjoining or well related to the existing dwelling.</u>	Point of clarification.
338	Page 167, para. 6.182	In terms of Proposals to extending the residential curtilage of a property, will be carefully considered <u>ation should in terms of be given to</u> the impact the change of use of the land to a residential use (e.g. from agricultural grazing land) may have on the surrounding area in terms of its visual appearance in the wider landscape, and its impact on landscape, and/or settlement character. Proposals should particularly have regard to the settlement form and the use of traditional boundary treatments that reflect the historic character of the area.	For clarification
339	Page 167, policy HC-D15	HC-D145 RESIDENTIAL EXTENSIONS 1. Proposals for residential extensions will be permitted where they:	Policy numbering changed due to deletion of policy HC-D6.

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		<p>a) accord with the principles set out in CE-S6 Design and Sustainable Construction Principles and CE-D4 Extensions;</p> <p>b) ensure there is sufficient space within the existing curtilage to accommodate the extension without resulting in overdevelopment of the site or adversely impacting on residential amenity space and parking provision;</p> <p>c) are not disproportionate to the original dwelling and in any case do not increase the external floorspace of the original dwelling by more than 35% (taking into account any extensions provided through permitted development rights); and</p> <p>d) ensure the maintenance or replacement of any bat and barn owl roosts that may be present.</p> <p>2. Residential extensions will not be permitted in the following circumstances:</p> <p>a) for dwellings where the size is restricted the proposed extension would exceed the net internal floorspace limitation – including local need affordable dwellings, extended family dwellings, succession farming dwellings, rural land-based worker dwellings and specialist housing for older people;</p> <p>a) b) for temporary dwellings, or</p> <p>b) c) for dwellings that are unauthorised or immune from enforcement action – including those dwellings which have had the benefit of a Certificate of Lawful Use or Development <u>where they would not otherwise comply with policies in the Local Plan.</u></p> <p>3. Extensions to residential curtilages will only be permitted where it can be demonstrated that it will not adversely affect visual amenity, the setting of the residential building, and the surrounding landscape, <u>biodiversity</u> and/or settlement character of the area.</p>	<p>Clause 2.a) deleted in response to representation number 0061/04.</p> <p>Change to clause 2 b) [formerly 2.c)] in response to representation number 0058/19.</p> <p>Changes to clause 3 for consistency.</p>

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340	Page 168, para. 6.183	<i>Change policy reference numbering: HC-D16 <u>D15</u></i>	Numbering changed due to deletion of policy HC-D6.
341	Page 168, para. 6.184	It is important that the number, scale and design of any buildings within the curtilage of a dwelling should not detract from the character or appearance of the dwelling, the site and the surrounding area, as the siting and design of outbuildings can potentially be as significant as any other built development. Care should be taken to ensure that the position and design of ancillary outbuildings safeguards the amenity of neighbouring occupiers. Proposals which would reduce the level of private amenity space, including parking provision, around the dwelling to an unacceptable level should be avoided. <u>This is</u> to prevent issues in the future such as the relocation of private parking to on-street parking in locations where public parking demand is high or where it could interrupt the flow of traffic.	To correct a grammatical error.
342	Page 168, para. 6.187	<i>Change policy reference numbering: HC-15 <u>D14</u></i>	Numbering changed due to deletion of policy HC-D6.
343	Page 168, policy HC-D16	HC-D15<u>6</u> OUTBUILDINGS 1. Proposals for ancillary outbuildings within the domestic curtilage of a dwelling will be permitted where: a) in terms of scale and massing they are proportionate to the dwelling they are to serve; b) there is no unacceptable adverse impact on the character, appearance or setting of the existing dwelling, the surrounding landscape, or the amenity of neighbouring occupiers by reason of their siting and design in accordance with policy CE-S6; c) in the case of the conversion of an existing building, the character and appearance of the building is conserved in accordance with policy CE-S5; and	Numbering changed due to deletion of policy HC-D6.

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		<p>d) private amenity space around the dwelling will not be reduced to an unacceptable level.</p> <p>2. Any element of the proposal that pertains to primary living accommodation should accord with the requirements of policy HC-D15 D14 Residential Extensions.</p>	
344	Page 169, para. 6.188	Applications for replacement dwellings often come forward where an existing dwelling is in disrepair. In many cases such dwellings are of timber construction, modest in size and built prior to the introduction of planning control. Listed buildings or dwellings that are considered to be of historic <u>or architectural</u> importance will not be considered for replacement (CE-S4 Cultural Heritage and, CE-D3 Conserving Heritage Assets). The Exmoor National Park Historic Environment Record has an extensive source of information that includes the historic built environment and can provide useful evidence for applicants proposing to replace an existing dwelling. Where the residential use has been abandoned, any proposals will be assessed against policies for new build residential dwellings (HC-D2 and HC- D8 <u>D7</u>).	To better reflect the policy wording. Numbering changed due to deletion of policy HC-D6.
345	Page 169, para. 6.189	Applicants should <u>will need to be able to</u> demonstrate that the existing building adversely affects the landscape or built character of the area. Dwellings recently destroyed by accident/fire will be eligible for replacement.	For clarity.
346	Page 169, para. 6.191	The replacement dwelling should be of a similar scale, massing and floorspace as the original dwelling to avoid any adverse harm to landscape character and visual amenity; where existing dwellings have a net internal floorspace <u>gross internal area</u> below 903sqm, the proposed replacement should not exceed 903sqm. In terms of policy HC- D17 <u>D16</u> the 'original dwelling' is the dwelling as it exists at the point of application to the National Park Authority. This approach will help to ensure that a stock of smaller, more affordable dwellings remains in the National Park.	Change to 93 sqm as a result of technical housing standards (nationally described space standards) and for clarification. Numbering changed due to deletion of policy HC-D6.

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347	Page 169, para. 6.192	Conditions will be attached to any permission granted to remove permitted development rights in relation to extensions on replacement dwellings less than 90 <u>93</u> sqm to ensure they are more affordable to local people. For replacement dwellings larger than 90 <u>93</u> sqm, the 35% extension allowance should not be factored in to the proposals for the replacement dwelling as this would result in a considerably larger dwelling in terms of scale and massing than the existing dwelling on site. A separate application would be required for any subsequent extension to the replacement dwelling (unless within permitted development rights) to ensure that the design does not adversely impact on the surrounding landscape or settlement character, and the amenity of neighbouring occupiers in accordance with policies CE-D4 Extensions and HC- D15 <u>D14</u> Residential Extensions.	Change to 93 sqm as a result of technical housing standards (nationally described space standards) in response to representation 0063/11. Numbering changed due to deletion of policy HC-D6.
348	Page 170, policy HC-D17	<p>HC-D16<u>7</u> REPLACEMENT DWELLINGS</p> <p>1. Proposals for the erection of a replacement dwelling will be permitted where the existing dwelling:</p> <ul style="list-style-type: none"> a) is not listed or considered to be of historic or architectural importance worthy of conservation; b) has an adverse impact on the character and visual amenity of the area; and c) the residential use has not been abandoned. <p>2. The proposed replacement dwelling should:</p> <ul style="list-style-type: none"> a) be sited on or close to the footprint of the existing dwelling, unless alternative siting would provide benefits for landscape, wildlife or cultural heritage ; b) be no larger in size than the original dwelling or 90 <u>93</u> square metres net internal floorspace <u>gross internal area</u>, whichever is the larger; c) reflect the massing and scale of the original dwelling; and 	Numbering changed due to deletion of policy HC-D6. Change to 93 sqm as a result of technical housing standards (nationally described space standards) in response to representation 0063/11.

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		<p>d) accord with the design and sustainable construction requirements of policy CE-S6.</p> <p>3. Where permission is granted, conditions will be attached to:</p> <p>a) remove permitted development rights granted by the Town and Country Planning (General Permitted Development) Order 2015 in respect of extensions on dwellings of less than 90 <u>93</u> square metres to ensure they do not exceed this size; and</p> <p>b) ensure that the existing dwelling is demolished and removed from the site prior to or within 3 months of the replacement dwelling first being occupied.</p>	
349	Page 171, para. 6.199	An assessment of gypsies and travellers for a partnership of Devon local planning authorities including the whole of Exmoor National Park was completed in 2015. ³²⁸ The study identified the level of accommodation need and demand for each local planning authority within the partnership area. For Exmoor National Park the evidence demonstrates that there is no demonstrable need for permanent or transit pitches to 2034, nor is there any requirement for additional housing to meet <u>the</u> ‘bricks and mortar’ needs of travelling communities.	Correction
350	Page 171, para. 6.201	As a result of concerns over the landscape impacts of residential caravans or mobile homes in a National Park, if a future local need for traveller sites is identified, the policy seeks to accommodate that need outside the National Park and the National Park Authority will work closely with local housing authorities to achieve this. Nevertheless, this Local Plan sets out an approach which acknowledges small scale provision may be justified in exceptional circumstances. Consistent with the conservation and enhancement of the National Park duty to local communities, and the overall approach to housing in Exmoor, a rural exception site policy approach will be used to seek to address the proven needs of the local community for small traveller sites where they can be accommodated without harm to the National Park (including sensitive habitats and wildlife) and in	To reduce the length of the plan.

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		accordance with GP3 Spatial Strategy, well related to existing buildings in or adjoining settlements. The forthcoming Exmoor Housing SPD will provide further guidance, including on assessment of local connection. Assessment of landscape impact will be required, including to take into account the variations in tree and hedgerow cover through the seasons, and a landscaping scheme to ensure a development is screened effectively.	
351	Page 175, para. 6.216	Policies HC-S6, HC-D18 and HC-D18 9 , support the provision and retention of new outdoor recreation areas and publicly accessible amenity spaces (as listed above) and the retention of existing outdoor recreation and amenity areas as identified on the Policies Map and in Annex 3 Important Open Space in Allerford and Luccombe. When submitting an application for additional open amenity space and outdoor sport and recreation facilities, the need for such development within the named settlements should be established through the evidence provided within the Exmoor National Park Open Space Strategy or other sources of evidence including community related information. Communities can also designate 'local green space' ³³⁶ through the preparation or review of a Local Plan or Neighbourhood Plan. This designation can only be used where:	Correction
352	Page 178, policy HC-D18	<p>HC-D178 LOCAL COMMERCIAL SERVICE PROVISION</p> <p>1. Proposals for new build, extensions or change of use of buildings for local commercial service provision within the named settlements will be permitted where:</p> <p>a) the proposed location contributes to the overall vitality of the settlement and the local economy;</p> <p>b) they will not adversely affect the locality, National Park, or the amenity of nearby residents as a result of traffic or parking (AC-D1);</p> <p><u>and</u></p>	<p>Policy numbering changed due to deletion of policy HC-D6.</p> <p>Correction to clause 1 b) and c).</p>

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		<p>c) if required by the National Park Authority, an impact assessment has been submitted, the scope of which has been agreed prior to submission; and</p> <p>2. Proposals for new local commercial service provision in the open countryside, through the reuse of existing buildings, will only be permitted in accordance with SE-S3 Business Development in the Open Countryside, and where:</p> <p>a) they are small scale ancillary retail development/operations principally offering for sale goods which are produced at the premises; or</p> <p>b) they principally comprise the sale of crafts and goods made on site, or shops and/or cafés which are ancillary to farms, visitor facilities, or camping and caravan sites; and</p> <p>c) they will not have adverse impacts on adjoining land uses; and</p> <p>d) it can be demonstrated that they will not adversely affect service provision in nearby settlements.</p> <p>3. Extensions to existing local commercial services will be permitted in accordance with policy CE-D4.</p>	
353	Page 182, policy HC-D19	HC-D189 SAFEGUARDING LOCAL SERVICES AND COMMUNITY FACILITIES	Numbering changed due to deletion of policy HC-D6.
354	Page 183, para. 6.237	The Exmoor National Park Landscape Character Assessment identifies landscape character types and areas across the National Park (see policy CE-S1 Landscape and Seascape Character). At a more local scale, there are smaller areas of land that have a landscape value to communities and the settlements they live in ³⁴² . The Local Plan inset maps identifies land of visual amenity value within and adjoining settlements, which recognises the significance these green areas have to the setting of buildings and other features, and their importance to the overall character of a settlement ³⁴³ . These are different to areas in settlements which are	Amendment to policy title. Numbering changed due to deletion of policy HC-D6.

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		considered to be recreational, amenity and public green space that are open to everyone to use are defined as important open space for recreation and which are considered in policies HC-S6 and HC-D189.	
355	Page 183, footnote 342	Natural England & Scottish Natural Heritage (2002) Landscape Character Assessment Guidance	Delete reference – not required.
356	Page 183, footnote 343	There are areas of Important Visual Amenity Space located at Allerford and Luccombe –these settlements do not have inset maps as they are not <u>identified as a named settlement</u> within the settlement hierarchy <u>spatial strategy</u> (see Section 14: Annex 3 for relevant maps)	Point of clarification.
357	Page 184, policy HC-D20	HC-D1920 HC-D1920 IMPORTANT VISUAL AMENITY SPACE	Numbering changed due to deletion of policy HC-D6.
358	Page 184, footnote 348	Department of Health (2013) Care in local communities – A new vision and model for district nursing [Online] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/213363/vision-district-nursing-04012013.pdf	Update reference

Section 7: Achieving a Sustainable Economy

Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
359	Page 187, para. 7.4	Exmoor’s economic activity illustrates that two thirds of working age people within the National Park are economically active. There are generally low levels of unemployment despite the low levels of economic activity as a result of the large retired population and the fact that much work is seasonal. Of those working age people that are economically inactive two thirds are retired ³⁵¹ . Compared to national and regional levels there is a high proportion of self-employment (<u>26%</u>) ^{X1} and working from/at home (<u>37%</u>) ^{X2} within the National Park, which is characteristic of or sparse rural areas where people are twice as	Points of clarification.

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		<p>likely to be home-based or self-employed, as those in less sparse areas³⁵². Entrepreneurial activity in such sparse rural locations is generally higher than in urban areas; similar to levels observed in inner London³⁵³.</p> <p><i>Insert footnotes:</i></p> <p><u>X1 Office for National Statistics (2013) - 2011 Census, Key Statistics for National Parks in England and Wales</u></p> <p><u>X2 Office for National Statistics (2015) Table CT0418 Origin Destination Workplace – Method of travel to work (2001 specification) by distance travelled to work – published online at www.ons.gov.uk</u></p>	
360	Page 187, footnote 352	<p>Pateman, T. Office for National Statistics (2010) Rural and urban areas: comparing lives using rural/urban classifications – Regional Trends 43 2010/11, Office for National Statistics</p>	Correction
361	Page 190, para. 7.17	<p>Some businesses may grow and intensify their activity to a degree where proposals for extended or new premises are likely to have a detrimental and significant impact on the appearance and character of landscape and other special qualities of the National Park (including sensitive habitats and wildlife), and may no longer therefore be compatible with their location. <u>Such proposals are likely to be considered under policy GP2 Major Development.</u> The National Park Authority seeks to enable successful businesses to expand appropriately, however there may be occasions where the scale of the business and the intensity of its activities are such, in terms of numbers of employees and traffic, for example, that it should consider moving to a more appropriate and sustainable location.</p>	Point of clarification in response to representation number 0067/16
362	Page 190, para. 7.18	<p>Home working and self-employment make an important contribution to Exmoor’s economy. The National Park Authority recognises that the provision of, and improvements in, communications infrastructure, including broadband,</p>	Correction – addition of two commas

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		are vitally important to many existing businesses, as well as a driver for enabling new businesses to prosper and provide high value home working opportunities. Policies for the appropriate improvement of communications technology, are set out in Section 9 of this Plan ‘Achieving Access for All’. Policies in this section of the Plan seek to encourage home based business where it can be accommodated as part of a residential use and it is compatible with the area and the amenity of neighbouring occupiers. Provision for home based employment of an appropriate scale should accord with SE-D1 Home Based Businesses.	
363	Page 192, policy SE-S2	<p><u>SE-S2 BUSINESS DEVELOPMENT IN SETTLEMENTS</u></p> <p>1. In the named settlements proposals for business development or extensions to existing businesses should accord with policy SE-S1 and be located within the settlement or where no suitable buildings/sites are available, well-related to existing buildings.</p> <p>2. Proposals will be permitted where:</p> <p style="padding-left: 20px;">a) they reuse existing traditional buildings wherever possible, in a way that maintains and enhances their character;; or where no suitable buildings are available;</p> <p style="padding-left: 20px;">b) where no suitable traditional buildings are available they reuse non-traditional buildings, or previously developed sites and proposals achieve enhancement;; or where this cannot be achieved;</p> <p style="padding-left: 20px;">c) <u>where this cannot be achieved</u> a replacement of a non-traditional building, or a new site/building may be permitted.</p> <p>3. In addition to clause 1, any proposals for new build development in Porlock Weir, other than extensions to existing premises, should be:</p>	Amendments made in response to representation number 0043/36

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		<p>a) small-scale to reflect the form and character of the of the settlement; and b) compatible with industries associated with the settlement.</p>	
364	Page 192, para. 7.25	Policy SE-S3 provides opportunities, and sets out the policy framework, for new business development in the open countryside, through the extension <u>or redevelopment of existing business sites or buildings</u> , and the reuse of existing buildings in farmsteads or hamlets. Ensuring that the best use is made of existing buildings, including those with the benefit of planning permission, will help to ensure that the National Park is conserved and enhanced (GP4 The Efficient Use of Land and Buildings). In recognition of the importance of farming and forestry to the area, policy <u>SE-S4</u> provides for agricultural and forestry development.	<p>Text inserted regarding new business development in the open countryside specifically relating to the redevelopment of existing employment sites. Partially responds to representations: 0015/01, 0015/02, and 0015/03.</p> <p>Policy reference added for clarification.</p>
365	Page 192, para. 7.26	<i>Change policy numbering:</i> HC-D 9 <u>10</u> Succession Farming – Second Dwelling on Established Farms	Proposed change to policy numbering as a result of the proposed deletion of Policy HC-D6.

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366	Page 192, insert new paragraphs after 7.26	<p><u>The policy aims to provide diversification opportunities for rural land-based businesses which are businesses that manage the land extensively in a way that conserves and enhances the National Park’s special qualities. These can be defined as farming enterprises based on primary food production, rural estates, forestry, mixed enterprises (e.g. with equestrian activities and/or game shooting) and other businesses that manage the land for conservation and/or recreation, which have benefits for health and well-being. These land-based businesses should also need to be located in the open countryside due to the nature of their operations.</u></p> <p><u>In terms of diversification proposals e.g. for conversions to holiday lets (RT-D4), provision of alternative camping accommodation (RT-D9), or the conversion of buildings for business development (which do not benefit from permitted development rights) a rural land-based business should provide at least full time employment for at least one member of staff. A small-holding that is a hobby farm as a lifestyle choice, which does not directly provide employment for one full-time equivalent person is unlikely to be considered for such diversification opportunities.</u></p> <p><u>Where there may be difficulties in determining whether a proposal for diversification of a ‘rural land-based business’ the applicant will need to demonstrate that the land-based business is a viable concern that generates sufficient income to diversify, or provide a business plan to show how the land-based enterprise can continue to be viable through diversification proposals.</u></p>	Insertion of text to provide explanation of rural land-based businesses in the context of diversification proposals.

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367	Page 193, para. 7.29	In the open countryside, reuse of traditional buildings (CE-S5 Principles for the Conversion or Structural Alteration of Existing Buildings) is strongly favoured where the existing building is well related to existing (farm) buildings in a farmstead or within a hamlet. <u>Many traditional farm buildings are recorded on the Historic Environment Record as listed buildings, locally important heritage assets on historic farmsteads; proposals should therefore accord with policies relating to the historic environment (CE-S4 and CE-D3).</u> Proposals for the re-use of existing or construction of new isolated buildings for farm diversification will not be permitted unless it accords with Policy RT-D6 (Camping Barns).	References to policies relating to the historic environment, in response to representation number 0120/16
368	Page 193, insert a new paragraph after 7.31	<u>7.31A To help safeguard existing employment sites in the open countryside (not including agricultural or forestry land or buildings), sites may be redeveloped for new business uses (B use classes) where there are existing buildings on a site that have been directly utilised by employees as employment premises, and where the new buildings do not significantly increase the floorspace above that of the employment buildings to be replaced. New buildings should be sited on the footprint of existing buildings unless other locations on the site would help provide enhancement to the setting or benefit wildlife. Proposals should be of a high standard of design (policy CE-S6), and provide an enhancement of the site consistent with landscape character. Traffic and road safety interests should also be addressed.</u>	Change to the text ensures that the policy intention is clear in relation to the redevelopment of existing employment sites in the open countryside and responds to representation number 0015/05.
369	Page 194, policy SE-S3	SE-S3 BUSINESS DEVELOPMENT IN THE OPEN COUNTRYSIDE 1. Business development will be permitted for the change of use and conversion of an existing traditional building that is well-related to an	Amendment to clause 3.d) provides greater certainty for diversification proposals, in response to representation number 0043/37.

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		<p>existing group of buildings on a farmstead or in a hamlet where there is an existing dwelling, in accordance with policies SE-S1 and CE-S5.</p> <p>2. Proposals for extensions to existing business sites or buildings that are well-related to an existing group of buildings on a farmstead or in a hamlet where there is an existing dwelling will be permitted in accordance with SE-S1 and where the scale and appearance of the development are compatible with local landscape character.</p> <p>3. Additionally, proposals for the diversification of existing agricultural, or other primary businesses responsible for land management, through the re-use/change of use of an existing non-traditional building for business development may be permitted where the following will be achieved:</p> <p>a) they are well-related to an existing group of buildings on the farmstead and accord with policy CE-S5;</p> <p>b) it can be demonstrated that the agricultural use of the existing building(s) to be re-used is redundant;</p> <p>c) the proposed business development supports an existing agricultural or other primary business responsible for land management and does not conflict with the existing farming or land management activity; and</p> <p>d) where proposals relate to the change of use of an existing building from an agricultural use to a business use (use classes B1, B2, B8 or sui generis), a condition may <u>will</u> be attached to the permission to enable the building to be used for the purposes of agriculture or the permitted business use.</p> <p>4. The erection of new business premises in the open countryside will not <u>only be permitted for the redevelopment of existing employment sites,</u></p>	<p>Change to clause 4 ensures that the policy is clear in relation to the redevelopment of existing employment sites in the open countryside and responds to representation numbers 0015/05 and 0067/17.</p>

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		<p><u>where existing buildings are replaced with no significant increase in size, and enhancement is achieved.</u></p> <p>5. Business use in buildings which stand alone or which do not relate well to existing buildings and are not part of a farm group or hamlet will not be permitted.</p>	
370	Page 194-5, para. 7.34	<i>Change policy numbering: Policy HC-D145 Residential Extensions</i>	Proposed change to policy numbering as a result of the proposed deletion of Policy HC-D6.
371	Page 195, para. 7.37	<p>LIVE-WORK OPPORTUNITIES</p> <p>Within Local Service Centres and Villages there is the potential for conversions and new build market housing to enable the delivery of affordable housing – this may provide opportunities for live-work arrangements for both affordable and market housing where such needs exist. In the open countryside the conversion of existing buildings enables the provision of extended family dwellings (on farmsteads) and local affordable homes (in hamlets and on farmsteads), whilst the conversion of additional buildings or the same building(s) to business space is also acceptable; such an approach would be conducive to a live-work arrangement. Similar schemes have been already been provided in the National Park. Proposals for ‘live work’ units should be in accordance with housing policies in Section 6.</p> <p><i>[insert new paragraph]</i></p> <p><u>7.37A Primarily, live-work arrangements will only be suitable where the location is considered to be acceptable for housing development (see Section 6 Achieving a Thriving Community). In all cases live-work arrangements should be designed so that the work space can be used independently of the dwelling space – this offers</u></p>	Amendment in response to representation number 0067/18 to provide additional clarification regarding live-work arrangements.

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		<u>some flexibility for future employment opportunities, so it is not necessarily restricted to the occupants of the associated dwelling.</u>	
372	Page 195, policy SE-D1	<p>SE-D1 HOME BASED BUSINESSES</p> <p>1. 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 will be permitted where:</p> <p style="margin-left: 20px;">a) there is no unacceptable adverse impact on the landscape or the amenity of the area or on the occupiers of neighbouring properties; and</p> <p style="margin-left: 20px;">b) where an extension is proposed the development accords with Policy HC-D145 Residential Extensions.</p> <p>2. Where necessary, conditions will be attached to any granting of planning permission including to:</p> <p style="margin-left: 20px;">a) control the use to avoid or minimise any potential adverse impacts;</p> <p style="margin-left: 20px;">b) remove permitted development rights to protect the character and appearance of the building;</p> <p style="margin-left: 20px;">c) ensure any new development may only be occupied in association with the dwelling and cannot be let or disposed of separately from that dwelling; and</p> <p style="margin-left: 20px;">d) allow, where appropriate, the business use to cease and revert to an ancillary domestic use without the need for further planning permission.</p> <p>3. Proposals for live-work units should be in accordance with the housing policies in this Plan <u>and designed so the employment space can be used independently of the living accommodation.</u></p>	<p>Point of clarification regarding live-work arrangements in clause 3 of the policy – partially to reflect comments made in representation number 0067/18.</p> <p>Proposed change to policy numbering in clause 1.b) as a result of the proposed deletion of Policy HC-D6.</p>

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Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
373	Page 195, para. 7.38	Given the finite supply of employment land in the National Park, and the limited supply of greenfield land for development, the presumption is that existing employment sites and premises <u>within named settlements and in the open countryside</u> , will be safeguarded for economic uses. They make an important contribution towards the local economy, sustainability and self-containment of Exmoor’s communities.	Point of clarification.
374	Page 197, para. 7.42	<u>Exmoor’s agricultural land is dominated by mainly sheep and beef farming systems.</u> Farming, both on Exmoor and nationally, has faced a number of challenges which have particularly affected smaller farms in upland areas. <u>Within the National Park there is a continuing trend towards larger farms over 100ha, with numbers of smaller holdings declining.</u> The consequence on Exmoor has been a decline in traditional forms of farming with a decline in medium sized farms and an increase in the number of smaller (residential) holdings. As a result, a number of large farms managed by a relatively small number of operators are responsible for the management of a large proportion of Exmoor’s agricultural land. Evidence indicates there is a relatively lower dependency upon agriculture as a source of income³⁶⁴. <u>Diversification (on and off farm) continues to form part of the farm income, currently contributing over 16% of income on average, with suggestions that there will be an increase in the importance of diversification in the future.</u> Evidence indicates that Exmoor’s farms appear resilient with a good age structure amongst farmers and a range of farming strategies, with some signs of recovery in incomes and/or fortunes since 2005 for hill farms. However, <u>low incomes from farming remain a widespread problem and therefore it appears that diversified incomes will become more important</u> , as only a fifth of farm businesses on Exmoor provide all the household income. Employment levels have fallen, a trend that is expected to continue, and the average age of farmers on Exmoor is now more than 55³⁶⁵. These changes have implications for Exmoor’s local economy.	Updated in relation to new evidence.

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375	Page 197, footnotes 364 and 365	³⁶⁴ Loble, M <i>et al</i> (2004) <i>The State of Farming on Exmoor 2004 – University of Exeter</i> ³⁶⁵ ibid. <u>CCRI (2015) State of Farming on Exmoor 2015</u>	Deletion of reference and updated reference to reflect new evidence.
376	Page 198, para. 7.50	<p>Applicants are encouraged to approach the Authority at an early stage for advice on: the siting and design of buildings; whether a proposal requires planning permission; and the need for, and scope of, an Environmental Impact Assessment. New farm buildings tend to have a large, wide span with shallow pitched roofs comprising factory frame and panel components to allow for modern farm operational requirements including the need for efficient movement and access of machinery, and ventilation for larger numbers of stock. These buildings can have an industrial appearance and scale, therefore in assessing proposals for agricultural and forestry development and operations, the main considerations must be siting and design to ensure the landscape, wildlife, visual quality and historic character of the surrounding area is conserved, as well as avoiding possible environmental impacts and effects on neighbouring land uses, including residential. It is generally preferable in functional terms, and visually, for a new farm building to form part of an existing group. A landscaping scheme may also be required, which reduces the impact of the proposal on the wider landscape in accordance with CE-S1 Landscape <u>and Seascape</u> Character and CE-D1 Protecting Exmoor’s Landscapes and Seascapes.</p>	Amendment to policy title.

Section 8: Achieving Enjoyment For All

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377	Page 201, para. 8.2	In terms of sustainable recreation and tourism development, national policy ³⁷⁰ clearly states that such developments should be supported where they would have environmental, social and economic benefits to the area including for environmental conservation, rural businesses, visitors, and local communities. Such development includes the expansion of existing businesses in appropriate locations, where this will not compromise the National Park's special qualities, and recognising that tourism and recreation development may meet identified needs that are not provided by existing settlement facilities, and provide benefits for the education, health and well-being of local communities. The government published six key challenges³⁷¹ that should be addressed to ensure tourism is sustainable in a time of climate change.	Government document has been archived – therefore reference is deleted.
378	Page 201, footnote 371	DCMS (2009) Sustainable Tourism in England – A framework for action. Six challenges include: (i) minimise impact and resource use, (ii) address impact of tourism transport, (iii) improve quality and make holidays accessible to all, (iv) improve the quality of tourism jobs, (v) maintain and enhance community prosperity and quality of life, (vi) reduce seasonality of demand.	Government document has been archived – therefore reference is deleted.
379	Page 202, footnote 375	Europarc Federation: European Charter for Sustainable Tourism in Protected Areas – underlying principles – published online at http://www.european-charter.org/become-a-charter-area/charter-principles <u>Europarc Federation (2015) Sustainable Tourism in Protected Areas – good for Parks, good for People</u>	Updated reference
380	Page 202, footnote 376	EUROPARC (2015) Definition of Sustainable Tourism	Not required – reference incorrect
381	Page 203, para. 8.12	Tranquillity is one of Exmoor's special qualities; providing an experience of calm in an area protected for its high quality landscapes. It is important for people's	Point of clarification regarding the experience of tranquillity

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		<p>health, well-being and improving quality of life; and also significant for Exmoor’s economy, as people come here to escape the noise disturbance and visual intrusion experienced in more urban areas³⁷⁸. This does not imply no noise generation at all, but there are some recreational pursuits such as motorised sporting activities and clay-pigeon shooting grounds that are considered to be inappropriate in the National Park as they have the potential to have an adverse effect on the quiet enjoyment of others (<u>including neighbouring properties and users of nearby public rights of way and access land</u>) through exposure to <u>unacceptable levels</u> of noise disturbance that may be sustained for significant periods of the day, throughout the year (<u>see paragraph 5.51 and CC-S7 Pollution</u>). Impacts on landscape character and tranquillity, through intensity of activity, noise, and overall scale will be key considerations in determining whether proposals for recreation and tourism developments are acceptable.</p> <p><i>Insert footnote 378:</i> <u>³⁷⁸ Campaign to Protect Rural England (2006) Saving Tranquil Places</u></p>	<p>and noise pollution in response to representation number 0067/19</p> <p>Include missing footnote 378</p>
382	Page 203, footnote 379	<p>The Countryside Agency (2004) Beyond the picturesque – Principles for sustainable tourism in National Parks and AONBs</p> <p><u>National Parks England (2013) Policy Position Statement on Sustainable Tourism</u></p>	Updated reference
383	Page 204, policy RT-S1	<p>RT-S1 RECREATION AND TOURISM</p> <p>1. Opportunities to provide a high quality, inclusive visitor experience on Exmoor through a diverse range of recreation and tourism facilities that actively enhance the understanding and enjoyment of the National</p>	Point of clarification to the list of guiding principles for recreation and tourism development in response to

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		<p>Park’s special qualities will be encouraged <u>in accordance with the following principles:-</u></p> <p>2. Development proposals should demonstrate that:</p> <ul style="list-style-type: none"> a) They underpin the quiet enjoyment of the National Park. There are no unacceptable adverse effects on the natural and historic environment either individually or cumulatively through levels of activity or use. b) They contribute towards a sustainable future for Exmoor’s local economy and communities. c) They support the improved health and wellbeing of people living, working and visiting Exmoor through the benefits of recreation and experience of tranquillity. d) They ensure appropriate and safe access by the road network and where possible by walking, cycling, horse-riding and public transport. e) They safeguard the existing access network, including public rights of way, and access land; and provide enhancements where opportunities arise (RT-D12). f) They respond to opportunities to improve the quality and viability of existing recreation and tourism businesses, through appropriate restoration, extension, expansion or diversification. g) They are of a scale compatible with their location and setting, in accordance with the relevant development management policy considerations for tourism and recreation (policies RT-D1 to RT-D12). 	<p>representation number 0043/39</p>

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384	Page 205, footnote ref 380	Quality in Tourism (2015) the assessment service provided for <u>Visit England</u>	Correction
385	Page 206, para. 8.24	<i>Change policy numbering: HC-D145 (Residential Extensions)</i>	Proposed change to policy numbering as a result of the proposed deletion of Policy HC-D6.
386	Page 207, policy RT-D2	<p>RT-D2 STAFF ACCOMMODATION</p> <ol style="list-style-type: none"> 1. Proposals for staff accommodation will only be permitted where it can be demonstrated that such accommodation is not available in the locality or cannot be provided within the existing hotel, guesthouse or hostel. Where this need cannot be met provision for staff accommodation will be permitted through: <ol style="list-style-type: none"> a) the change of use and conversion of existing buildings that are within the curtilage in accordance with CE-S5, or where this is not possible; or b) <u>where this is not possible</u>, a small-scale extension to the hotel or guesthouse as a self-contained annexe. 2. Staff accommodation will be tied through a condition or planning obligation to the existing premises, to ensure that it cannot be sold separately or occupied as a separate accommodation unit – other than for staff or owners. 3. Where there is evidence that the need for staff/owner accommodation is no longer required, the following uses will be considered: <ol style="list-style-type: none"> a) a local occupancy tie to meet local affordable housing needs (HC-S1); 	Clarification of policy tests in response to representation number 0043/40

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		<p style="text-align: center;">b) non-serviced holiday-let (RT-D4); or c) extension of guest accommodation.</p> <p style="text-align: center;">4. No further extension will be permitted for staff accommodation on premises where the previous staff accommodation has been lost to other uses.</p>	
387	Page 207-8, para. 8.30	<i>Change policy numbering: policy HC-D145 Residential Extensions</i>	Proposed change to policy numbering as a result of the proposed deletion of Policy HC-D6.
388	Page 209, para. 8.35	Where an applicant is seeking a change of use from serviced accommodation to residential, proposals should first demonstrate that they cannot achieve any other use specified in clause 3(a) of the policy. Where the principle of residential use is accepted, proposals should accord with policy HC-D6 The Change of Use of Serviced Accommodation to Housing <u>the tests for the change of use of buildings to residential use in clause 2 of policy HC-D1.</u>	In response to the deletion of policy HC-D6 The Change of Use of Serviced Accommodation to Housing as a consequence of the removal of S106 thresholds for affordable housing from Planning Practice Guidance.
389	Page 209, policy RT-D3	<p>RT-D3 SAFEGUARDING SERVICED ACCOMMODATION</p> <p>1. Development proposals that would involve the loss of existing serviced accommodation will only be permitted where:</p> <p style="padding-left: 20px;">a) other employment uses are to be created in the existing building; or</p> <p style="padding-left: 20px;">b) evidence clearly demonstrates the use can change to a pPrincipal rResidence dwelling (HC-S4) where:</p> <p style="padding-left: 40px;">i) the use was formerly a single residential dwelling on 1st July 1948 or built as a single residential dwelling subsequently;</p> <p style="padding-left: 40px;">ii) there has been no excessive alteration or extension; and</p>	In response to the deletion of policy HC-D6 The Change of Use of Serviced Accommodation to Housing as a consequence of the removal of S106 thresholds for affordable housing from Planning Practice Guidance.

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		<p style="text-align: center;">iii) the existing use does not provide an additional community service or function.</p> <p>2. Where clause 1 does not apply, proposals relating to the change of use of serviced accommodation should demonstrate that the current use of the building as serviced accommodation cannot be continued or made viable in the longer term and the property has been marketed as a going concern at a reasonable value for a minimum period of 12 months. An independent valuation of the building will be required.</p> <p>3. Where it is demonstrated that the serviced accommodation is <u>no</u> longer viable (clause 2), proposals for change of use should be compatible with the cultural heritage of the existing building, local character and amenity and in accordance with the following:</p> <p>a) Changes that will be considered acceptable in principle include:</p> <ul style="list-style-type: none"> i) Change of use to self-catering apartments. ii) Change of use to provide community services or facilities. iii) A mixed use development, based on the uses listed above including employment use. <p>b) Proposals for the change of use to residential dwellings will only be considered where the requirements of this policy are met and clause 3(a) cannot be achieved. Proposals should accord with HC-D6 Change of Use of Serviced Accommodation to Housing <u>the tests set out in clause 2 of policy HC-D1</u>.</p> <p>c) In relation to 3 (a) and (b), opportunities for the partial change of use of the building or complex that supplements the existing serviced accommodation will be encouraged.</p>	

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390	Page 210, para. 8.38	In circumstances where self-catering complexes (a property where there is more than one holiday let unit with a holiday occupancy condition) may wish to expand, the creation of additional units and the small scale extension of existing units , through the conversion of existing buildings, <u>and the small scale extension of existing units</u> , may be allowed to improve the capacity and/or quality of existing accommodation – where this will not detrimentally affect the character or historic interest of the building(s). Self-catering complexes may also have the capacity to diversify the type of accommodation they offer through provision of alternative forms of accommodation (see RT-D9 Alternative Camping Accommodation). Extension of existing holiday-let units or diversification can increase non-serviced accommodation capacity during the main tourist season where availability is at its lowest.	Point of clarification to ensure the written justification is consistent with Policy RT-D4 Non-Serviced Accommodation.
391	Page 201, para. 8.39 c)	c) the diversification of a rural land based business (<u>also see SE-S3 Business Development in the Open Countryside</u>).	Point of clarification
392	Page 211, para. 8.41	<i>Change policy numbering:</i> policy HC-D12 3 Replacement of Holiday Occupancy Conditions and Extended Family Ties	Proposed change to policy numbering as a result of the proposed deletion of Policy HC-D6.
393	Page 212, Policy RT-D4 Non-serviced Accommodation	<p><u>RT-D4 NON-SERVICED ACCOMMODATION</u></p> <p>1. Proposals for the change of use and conversion of buildings to non-serviced accommodation will be permitted where they:</p> <p>a) create additional unit(s) on an existing self-catering complex;</p> <p>b) accord with RT-D3 Safeguarding Serviced Accommodation clause 3a);</p> <p>c) reuse a redundant building associated with a hotel/guesthouse premises; or</p>	<p>Change to clause 1.d) to ensure a sustainable location and minimise any unacceptable adverse impacts on the landscape and visual amenity.</p> <p>Clause 4: Proposed change to policy numbering as a result of</p>

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		<p>d) relate to the diversification of a rural land-based business, <u>where the building is well-related to an existing grouping of buildings.</u></p> <p>2. Proposals should also meet the following principles:</p> <p>a) the character and appearance of the building and its setting is conserved, and where they accord with policies on landscape character, cultural heritage and design;</p> <p>b) in respect of changing the use of traditional farm buildings, the entire range of such buildings within a farmstead, will not be permitted to be converted to protect the historic character and significance of the buildings collectively (CE-S5);</p> <p>c) the design and layout of access and parking requirements are compatible with landscape character and built heritage, and the local road network has capacity to service the accommodation without adversely affecting road safety; and</p> <p>d) there are no adverse impacts on tranquillity and local amenity.</p> <p>3. Small scale extensions and alterations will be permitted to improve the quality and viability of existing non-serviced accommodation; where it would not adversely affect the historic character of the existing building. No new build units of holiday-let accommodation will be permitted.</p> <p>4. Where a non-serviced accommodation unit is no longer needed or viable, a proposal to replace the holiday occupancy condition of the unit with an agreement limiting occupancy to meet a local affordable need for housing or housing for extended families will be considered in accordance with policy HC-D123. In respect of changes to business or community use, proposals should accord with the relevant policies in the plan.</p>	<p>the proposed deletion of Policy HC-D6.</p>
394	Page 213-214, para. 8.49	Camping barns are also often referred to as bunkhouses, backpacker accommodation and hostels. They usually provide very basic accommodation	Correction

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		<p>and in more isolated locations very few facilities are provided apart from basic shelter; these are often referred to as ‘stone tents’. There are very few camping barns on Exmoor, especially those which are available to the wider public – some remote hostels for example are owned by organisations or private charitable trusts. Camping barns include these well established <u>privately-run</u> facilities at Northcombe Farm near Dulverton and Woodadvent Farm near Roadwater, and establishments <u>run managed</u> by the Youth Hostel Association (Pinkery and Minehead) within the National Park. Opportunities exist for a network of this type of accommodation to be created, particularly close to existing long distance trails such as the South West Coast Path, Two Moors Way and the Coleridge Way.</p>	
395	Page 214, policy RT-D6	<p>RT-D6 CAMPING BARNs</p> <ol style="list-style-type: none"> 1. Proposals for the change of use and necessary alteration of a traditional building to a camping barn or hostel accommodation will be permitted where it complements the historic character and appearance of the building, biodiversity interests, and its setting within the landscape. 2. Where the existing building is <u>located: in a farmstead or hamlet in close association with an existing dwelling, or in a named settlement:</u> <ol style="list-style-type: none"> a) <u>in a farmstead or hamlet in close association with an existing dwelling,</u> parking and access arrangements should be incorporated within the hamlet/farmstead <u>building group</u> without detrimentally impacting on landscape character and visual amenity; or b) <u>in a named settlement,</u> parking and access arrangements in a settlement are consistent with policies AC-D1 and AC-S3; and c) utility and service supplies will be routed underground. 3. The change of use and conversion of a traditional barn or building in an isolated location to provide basic shelter in a camping barn (stone tent) 	<p>Point of clarification to ensure the meaning of clause 2 is clear – in response to representation number 0043/41.</p> <p>Clause 2c will be removed as this is already a requirement of policy AC-D6 Fixed Line Transmission Infrastructure.</p>

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		<p>with limited facilities for walkers, will be permitted where it can be demonstrated that:</p> <p>a) the building can be managed effectively without new access provision;</p> <p>b) the proposal does not involve alterations to the external fabric and surroundings of the building that would materially affect the character or appearance of the building and its setting;</p> <p>c) the building is well related to the rights of way network or access land; and</p> <p>d) any bat and barn owl roosts that may be present are maintained or replaced.</p>	
396	Page 215, para. 8.55	<p>New commercial touring caravan sites are considered to be inappropriate within the National Park, due to the significant visual impact they can have on landscape character as a consequence of the degree of landscaping required to enable sites to accommodate the modern requirements of touring caravan parks; including access, parking, level pitches with hard-standing and associated utility and drainage provision. The adverse landscape impact is therefore considerable with or without caravans <u>or motorhomes</u> on the site. Consequently extensions to existing touring caravan sites or the provision for outdoor caravan storage facilities are also considered to be inappropriate in the National Park. Additionally Exmoor’s road network has a high proportion of narrow, single track lanes that limits opportunities for such development, as they are generally unsuitable and impractical for towed caravans and large motor-homes to navigate safely.</p>	Point of clarification relating to representation number 0052/11
397	Page 216, para. 8.58	<p>It is considered that static caravan sites could be replaced by appropriately designed holiday accommodation, such as single-storey timber chalets, camping pods, yurts, traditional Romany caravans or similar structures which</p>	Amendment to policy title.

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		offer alternative forms of holiday accommodation (RT-D9 Alternative Camping Accommodation). The proposals should demonstrate an overall visual and environmental improvement in terms of form, layout, materials, colour and landscaping, in accordance with policies CE-S1 Landscape <u>and Seascape</u> Character and CC-S6 Design and Sustainable Construction Principles. A reduction in the overall number of units/pitches will be expected where there are three or more static caravans on the site and the restoration of pitches should provide a benefit for wildlife. In terms of new chalet/log cabin holiday accommodation; these structures will only be permitted where they replace units on existing static caravan sites or chalet developments.	
398	Page 218, footnote 388	DCLG (2014 5) Planning Practice Guidance: Flood Zone and Flood Risk Tables, Table 2: Flood Risk Vulnerability Classification Paragraph: <u>066 Reference ID: 7-066-20140306 [Online]</u> http://planningguidance.planningportal.gov.uk/blog/guidance/flood-risk-and-coastal-change/flood-zone-and-flood-risk-tables/table-2-flood-risk-vulnerability-classification/	Correction to reference.
399	Page 221, footnote 392	ENPA (2010) Your Future Exmoor (YFE) consultation events <u>January – March 2010 (full feedback report)</u> , <i>Exmoor National Park Authority, Dulverton</i>	Correction to reference.
400	Page 222, footnote 393	ENPA (2010) Your Future Exmoor (YFE) consultation events <u>January – March 2010 (full feedback report)</u> , <i>Exmoor National Park Authority, Dulverton</i>	Correction to reference.
401	Page 224, footnote 396	South West England (2010) SWPLF Equestrian Guide <u>British Horse Society et al (2010) Horses, the Landscape and You: Equestrian guide to keeping horses in protected landscapes</u>	Correction to reference.
402	Page 224, footnote 397	Kent Downs AONB (2011) <u>Managing Land for Horses [recommend 2.5 acres as a guide 1 hectare per 500kg horse for resting and rotation to provide year round turnout and all or most of its nutritional requirements from that land]</u>	Correction to reference.

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Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
403	Page 227, para. 8.94	<p>A high standard of maintenance, clear way-marking and the minimisation of any conflicts between path users and landowners are vital to the enjoyment of the access network. The legal responsibility for the maintenance of PRoW lies with Devon and Somerset County Councils, which has been delegated to Exmoor National Park Authority for many years. Exmoor National Park Authority raises <u>will work</u> with farmers, <u>land owners</u> and land managers to address any issues arising from PRoW across their land. A large proportion of the network is available to pedestrians, cyclists and equestrian users. Users’ interests encompass the physical use and the understanding, enjoyment and experience of the access network including views and tranquillity. Opportunities to enhance the access network to improve the inclusiveness and enjoyment of the network to users of all abilities will be sought <u>be sought and national guidelines followed wherever possible to safeguard different user groups interests and find the best possible access option.</u></p>	Point of clarification in response to suggested modification (representation number 0045/01)
404	Page 227, footnote 402	<p>ENPA (2012) Exmoor National Park Partnership Plan 2012-2017, <i>Exmoor National Park Authority, Dulverton</i> Priority B2: Maintaining high quality rights of way, services and facilities to enhance enjoyment and understanding of the National Park Objective 9: To maintain and improve the recreational opportunities in the National Park particularly the rights of way network, access to open country, other quiet and active recreation based on Exmoor’s special qualities; and ensure that opportunities for recreation can be enjoyed by people from all backgrounds and of all abilities.</p>	Deletion of unnecessary text.
405	Page 227, footnote 403	<p><u>Devon County Council (2012) Rights of Way Improvement Plan 2</u> Devon County Council (2005) Improving Devon’s Environment: Rights of Way Improvement Plan (pages 85-121)</p>	Correction to references to the Rights of Way Improvement Plan in response to suggested modification (representation number 0069/13)

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Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
		<u>Somerset County Council (2015) Rights of Way Improvement Plan 2 and Appendices</u> Somerset County Council (2006) Rights of Way Improvement Plan November 2006 (section 10)	
406	Page 229, footnote 405	Lynton & Barnstaple Railway Trust Ltd (2015) Lynton and Barnstaple Railway <u>website: www.lynton-rail.co.uk/railway</u>	Correction to reference.
407	Page 230, para. 8.107	The design of all aspects of a proposal should therefore reflect the historic character and appearance of the original railway and ensure that the proposed development is integrated in terms of its landscape setting. Landscaping should be incorporated as part of the proposal to conserve and enhance the National Park. This should have regard to the site and landscape character of the area and also the traditional features of the former railway; this may include trees, hedges, walls, railings, fences and surface treatments (CE-S1 Landscape and Seascape Character, and CE-S6 Design and Sustainable Construction Principles). Detailed evidence should be provided with any application to demonstrate the need for any deviations from the original historic former railway route consistent with policy RT-D13 to ensure that the reinstated route will be safeguarded.	Amendment to policy title.

Section 9: Achieving Access For All

Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
408	Page 235, policy AC-S2	<u>AC-S2 TRANSPORT INFRASTRUCTURE</u> 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	Change to policy numbering to reflect comments made in representation number 0069/17, so the clauses are

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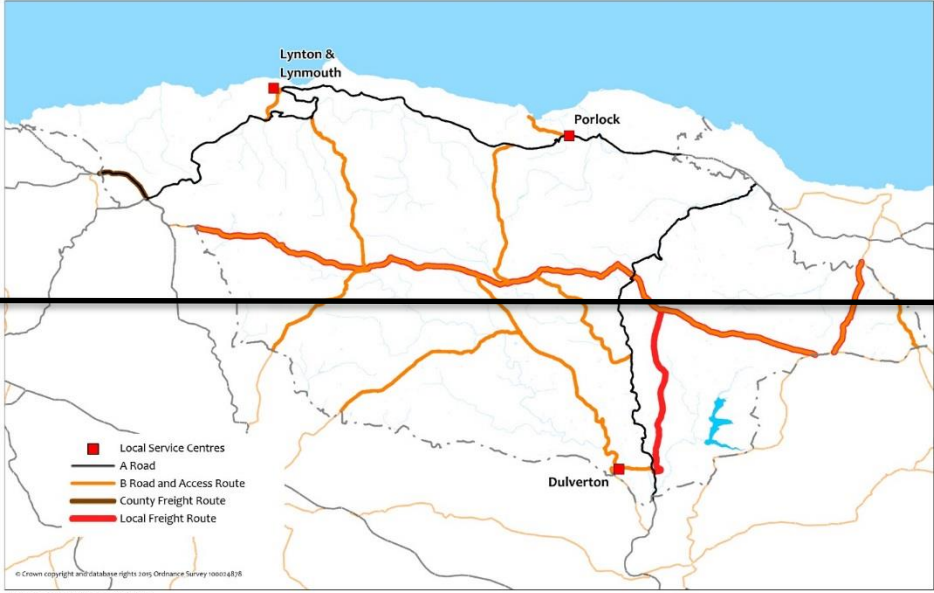
Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
		<p>and improvement schemes, parking or new access roads, signage and street furniture reflect local character and:</p> <ul style="list-style-type: none"> a) Are designed and constructed to conserve and enhance the natural beauty of the National Park, using materials and finishes that are appropriate to the character of the local landscape and built environment. 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) Incorporate wildlife enhancements and landscaping schemes including green infrastructure where appropriate. e) Minimise disturbance and damage during maintenance or construction. f) Minimise lighting (CE-S2), highways signage and reduce clutter. g) Take account of road safety interests particularly for non- motorised modes of transport, and the capacity and function of the road network. h) Increase future resilience of transport infrastructure at risk from climate change and extreme weather events through the use of sustainable drainage systems. <p>2. ↯) Upgrading of existing routes designed solely to accommodate high traffic speeds will not be supported.</p> <p>3. ↯) New roads and significant road widening are not considered to be appropriate in the National Park context, except where they would result in substantial environmental gain or community benefit.</p>	<p>exclusive from the list of inclusive sub-clauses a) to h).</p>

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Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
409	Page 238, para 9.20 (move to after current para 9.22)	The Exmoor Route Network (shown on the Policies Map, and Key Diagram (and Map 9.1 below) identifies the main transport routes on Exmoor according to their function in order to ensure that traffic uses roads most suited to the purpose of its journey. provides a hierarchy of routes for different types and modes of travel. The A class roads are the principal transport routes in the National Park, suitable for most types of traffic (with some exceptions relating to HGVs — see below); B class roads are suitable for medium sized vehicles; other smaller roads and lanes are only suitable for cars and other small vehicles.	Clarification in response to representation number 0069/18
410	Page 238, para 9.21	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. <u>There are weight and length restrictions on a number of A and B roads in the National Park due to constrained junctions or steep gradients, including at Dunster, Porlock Hill, Wheddon Cross and Lynmouth and Lynton.</u> There has been a significant increase in delivery vans, some of which is likely to have resulted from the growth in internet shopping ⁴¹⁰ . 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.	In response to representation number 0069/18
411	Page 238, para 9.22	There are no long distance <u>strategic national or regional</u> freight routes through the National Park, apart from a short section of A399 that passes through the western edge of the National Park which is identified as a County Freight Route. The A39 from Williton to Dunster and Minehead (outside the National Park boundary) is also designated a County Freight Route. Local Freight Routes, for local access only , are designated for the B3190 (Raleigh’s Cross towards Washford Cross), the tertiary route from Machine Cross to Heath <u>Ppoult</u> Cross, and the east/west route across the National Park consisting of the B3224, B3223 and B3358. These are longstanding routes signposted for HGVs for local access only .	In response to representation number 0069/18

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Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
		<p>The B3223 is unsuitable for HGVs at Dulverton, and not as strategic county level routes. The Exmoor Route Network provides the framework to ensure that freight traffic uses roads most suited to the purpose of its journey. The National Park Authority will support continued work by the Highways Authorities with hauliers and SatNav providers to <u>take unnecessary through</u> encourage traffic, particularly lorries and HGVs, <u>away from the National Park.</u> The use of unsuitable routes <u>will be discouraged through appropriate measures, such as positive signing and SatNav route information.</u> 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. 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 routes will be discouraged through appropriate measures, such as positive signing and SatNav route information.</p>	

Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
412	Page 239, Map 9.1	 <p data-bbox="533 943 1010 975"><i>See Appendix 5 for amended Map 9.1</i></p>	<p data-bbox="1619 280 2031 507">Minor amendments to the presentation of the map to show the Local Freight Route more clearly, add in road numbers and locations outside the National Park.</p> <p data-bbox="1619 555 1823 587">See Appendix 5</p>
413	Page 240, Policy AC-S3	<p data-bbox="521 983 1126 1015"><u>AC-S3 TRAFFIC MANAGEMENT AND PARKING</u></p> <ol data-bbox="521 1038 1570 1321" style="list-style-type: none"> <li data-bbox="521 1038 1570 1230">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 provision of alternative routes to avoid busy roads, safer crossing points, and use of shared surfaces where appropriate. <li data-bbox="521 1254 1570 1321">2. The Exmoor Route Network, as shown on the policies map, will form the framework for traffic and freight management in the National Park. 	<p data-bbox="1619 983 2011 1094">In response to representation numbers 0069/19, 0069/20 and 0043/45</p>

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Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
		<p>3. Replacement of existing car parking (lost through development or coastal change), or the creation of small scale new facilities will be permitted where: (a) this enables opportunities to enhance public understanding and enjoyment of the National Park,; or (b) this <u>would</u> relieves traffic and parking pressure elsewhere in the locality,; <u>including adverse impacts arising from parking on the highway.</u> and <u>Such provision should also ensure that:</u></p> <p>a) (c) there is good accessibility, and there would be no material harm to the character and appearance of the locality or views from publicly accessible locations; and</p> <p>b) (d) it is well designed in accordance with the criteria set out in policy AC-S2(1).</p> <p>4. 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 (AC-D4).</p> <p>5. Proposals for new development should make adequate provision for parking in accordance with AC-D3.</p>	
414	Page 240, footnote 411	<p>The parking standards in Table 9.1 are based on: the Somerset County Council (2013) Parking <u>Strategy</u> Standards <u>for</u> (Zone C), <u>(low population areas)</u> were adapted to reflect the lower levels and sizes of development that are more typical in the National Park, and applied across the whole National Park.</p>	Correction to reference.

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Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
415	Page 242, Table 9.1 – fourth row, third column	Case by <u>by</u> case basis	Correction
416	Page 244, para 9.35	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. The mains electricity network is delivered to homes and businesses on Exmoor via a local distribution network on wood pole lines (including 11kV and 33kV lines) . <u>Proposals for larger high voltage pylon routes and transmission lines</u> would be treated as major development (GP2) and are not considered to be appropriate in the National Park due to the impact on landscape character and other special qualities.	Clarification in response to representation number 0064/02
417	Page 244, footnote 418	ENPA (2010) Your Future Exmoor <u>(YFE) consultation events January – March 2010 (full feedback report)</u> , <i>Exmoor National Park Authority, Dulverton</i>	Correction to reference.
418	Page 246, footnote 424	ENPA (2010) Your Future Exmoor <u>(YFE) consultation events January – March 2010 (full feedback report)</u> , <i>Exmoor National Park Authority, Dulverton</i>	Correction to reference.
419	Page 246, footnote 426	Office for National Statistics (2003) Census 2001: Key Statistics for Local Authorities. London: The Stationery Office <u>(2015) Table CT0418 Origin Destination Workplace – Method of travel to work (2001 specification) by distance travelled to work – published online at www.ons.gov.uk – 31.35-37%</u> of people aged 16 – 74 in employment who work mainly at or from home within Exmoor National Park	Update to reference.
420	Page 246, footnote 430	Mobile Operators Association (2004) Joint Accord – Association of National Park Authorities, the Association for Areas of Outstanding Natural Beauty	Update to reference.

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Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
		<u>NPE & MOA (2014) National Parks England and Mobile Operators Association Joint Accord</u>	
421	Page 248, Policy AC-D5	<p><u>AC-D5 RADIO AND MOBILE TELECOMMUNICATIONS INFRASTRUCTURE</u></p> <ol style="list-style-type: none"> 1. Proposals for radio and mobile telecommunications development will be permitted where they first seek to share existing infrastructure, there is capacity in landscape terms, and no increase in height of existing masts is required. 2. Where it can be demonstrated that (1) is not possible, apparatus will be sited on existing masts or other features such as buildings or other structures, to minimise adverse effects on landscape character. 3. Where it can be demonstrated that (1) and (2) are not possible, the apparatus shall be sited and designed to ensure that it has an acceptable appearance in the landscape including through camouflage as a natural or traditional feature. 4. In determining all proposals: <ol style="list-style-type: none"> 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 <u>unacceptable</u> adverse effects on sensitive habitats and wildlife <u>or historic environment</u>; d) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building; 	In response to representation number 0120/24

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		<p>e) the amenity of nearby residents and visitors are not adversely affected; and</p> <p>f) opportunities for enhancement of the landscape including consolidation of any existing telecommunications infrastructure will be sought.</p> <p>5. 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 amelioration to visual impacts including as camouflage to antenna within trees.</p>	
422	Page 250, para. 9.57	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 cannot be mitigated (consistent with policies CE-S1 Landscape <u>and Seascape</u> Character, CE-S3 Biodiversity and Green Infrastructure, and CE-S4 Cultural Heritage and Historic Environment) 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 ⁴⁴² and particularly avoid highly sensitive open landscapes, such as moorland, and skyline intrusion.	Amendment to policy title.
423	Page 251, Policy AC-D6	<p><u>AC-D6 FIXED LINE TRANSMISSION INFRASTRUCTURE</u></p> <p>1. Proposals for new transmission lines will only be permitted where they first seek to be are routed underground, unless they this will conflict with policies CE-S1 Landscape <u>and Seascape</u> Character, CE-S3 Biodiversity and Green Infrastructure, CE-S4 Cultural Heritage and Historic Environment.</p> <p>2. <u>Where it can be demonstrated that (1) is not possible, other means of providing the service with minimal environmental impact should be</u></p>	In response to representation numbers 0050/02 and 0064/02 and for clarification.

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Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
		<p>considered (CC-S5 Low Carbon and Renewable Energy Development, CE-D7 Satellite Antennae). and the need for the service cannot be met in any other way.</p> <p>3. <u>Where it can be demonstrated that (1) and (2) are not possible in this circumstance</u>, 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.</p> <p>4. 2 Proposals relating to low voltage electrical cabling from renewable energy technologies (CC-S5) will only be permitted where:</p> <ul style="list-style-type: none"> 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. <p>5. 3 Development proposals that include <u>require</u> electricity or telecommunication service lines to new development will be expected to provide underground routing subject to policies CE-S1, CE-S3 and CE-S4.</p>	

Section 10: Exmoor’s Settlements

Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
424	Page 254, para. 10.10	Support and advice may include working with communities to help bring forward development that accords with the policies set out in the Local Plan. Suitable tools could include parish plans, supplementary planning documents (SPDs) or Area Action Plans for larger projects. The Authority also has a duty to support Neighbourhood Planning including the preparation of Neighbourhood Plans to address specific issues within a community including neighbourhood development plans, neighbourhood development orders, and community right to build. The Authority will provide advice to communities, including whether a strategic environment assessment or habitat regulations assessment will be required in the preparation of such plans. <u>Neighbourhood plans should be in general conformity with the strategic policies of the Local Plan.</u>	Point of clarification relating to representation numbers 120/02 and 0063/13.
425	Section 10 footnotes from page 269 to the end of the section.	<i>Continue numbering references from 451 onwards.</i>	To amend a formatting error which numbers footnotes from 880 onwards.
426	Pages 255 and 331 – Inset map legend	DISCLAIMER The Proposals <u>Policies</u> Map (including Inset Maps) have been produced with the most current data available at the time of print. Some information on the Proposals <u>Policies</u> Map is shown with the consent of external organisations. Enquiries regarding any external information should be directed to the relevant organisation.	Correction – in response to representation number 0043/48
427	Page 269, para. 10.47	Dulverton has a wide range <u>of</u> services and facilities which serve the local community and surrounding communities including those outside the National Park, such as part of Battleton and Brushford. The centre of the settlement has a variety of shops, tearooms and restaurants, in addition to a hotel, pubs and a	Minor correction

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Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
		number of offices. The town is an important visitor destination for those visiting or staying on Exmoor, and there are several shops and facilities to cater for their needs. The number of shops, businesses and community facilities is therefore considered to be relatively high compared to other settlements of this size outside the National Park	
428	Page 253, footnote 448	ENPA (2010) Your Future Exmoor (YFE) consultation events <u>January – March 2010 (full feedback report)</u> , <i>Exmoor National Park Authority, Dulverton</i>	Correction to reference.
429	Page 269	Change footnote reference numbers to continue from this point from 451 not 880.	Correction
430	Page 272, para. 10.66	Exford has a number of community services and facilities, with the Exmoor Stores (including Post Office) as the main community service in the village. Other facilities include Exford First School, the memorial hall, two pubs (within the hotels), the social club, the cricket ground <u>facilities</u> , and the church.	Correction
431	Page 278, para. 10.88	The Lyn Plan and contains a range of policies relating to development and land use within the parish. It has been prepared to ensure that it is in general conformity with those policies considered to be strategic within the Exmoor National Park Local Plan 2001-2011 and in conjunction with the preparation of this Local Plan. It is considered therefore, that the policies in the Lyn Plan will also be in general conformity with the strategic policies in this Local Plan. <u>Decision-making within the Lynton & Lynmouth neighbourhood area will be made in accordance with the strategic policies of the Local Plan and the policies of The Lyn Plan. The development management policies of the Local Plan will only be used in decision-making where The Lyn Plan is silent, indeterminate, out of date, or as stated in para 10.87, where a proposal relates to RT-D3.</u>	Clarification regarding the strategic policies of the Local Plan in relation to the Lynton & Lynmouth Neighbourhood Plan – representation number 0063/13
432	Page 279, policy ES-S2	ES-S2 LYNTON & LYNMOUTH NEIGHBOURHOOD PLAN	Clarification regarding the strategic policies of the Local

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Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
		<ol style="list-style-type: none"> 1. Development proposals within Lynton & Lynmouth parish shall be determined in accordance with <u>the strategic policies of the Local Plan and the Lynton & Lynmouth Neighbourhood Plan 2013 – 2028</u> and the strategic policies of the Local Plan. 2. Development management policies in the Local Plan will only be given greater weight in the following circumstances: <ol style="list-style-type: none"> a) where the neighbourhood plan is silent, indeterminate or out of date; and b) using RT-D3 sSafeguarding sServiced aAccommodation to determine related proposals for the change of use of serviced accommodation within the Neighbourhood Plan area (over-riding the Lyn Plan policy E2 Change of Use of Hotels & Guesthouses). 3. Should a conflict arise between development management policies in the Local Plan and the policies in the Neighbourhood Plan, the conflict will be resolved in favour of the Neighbourhood Plan until the end of the Plan period in 2028 or until it is reviewed, whichever is earlier, unless it is considered that the proposal would otherwise have a detrimental impact on the achievement of National Park purposes. 	<p>Plan in relation to the Lynton & Lynmouth Neighbourhood Plan – representation number 0063/13</p>
433	Page 287, footnote 894	<p>Somerset Coastal Change (2011) Pathfinder project <u>DEFRA & Somerset Coastal Change Pathfinder (2011) Somerset Coastal Change Pathfinder Report on Project at Porlock Weir</u></p>	<p>Correction to reference – footnote number to be updated to ensure consistency with the rest of the Plan.</p>
434	Page 294, para. 10.134	<p>The village is a popular base for walking and touring and tourism is one of the mainstays of the local economy. Businesses in the village include the Simonsbath House Hotel and outdoor recreation centre, Exmoor Forest Inn and hotel, Boevey’s tearooms and a small shop. <u>St Luke’s Church is also used as a community meeting place.</u></p>	<p>Point of clarification regarding service provision in the village.</p>

Section 11: Monitoring and Implementation Framework

Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
435	Page 304, indicator for CE-S1	Change in area of <u>Section 3</u> moor and heath as a result of development	Correction to state how this area will be defined.
436	Page 305	Delete reference to HC-D6 for the penultimate indicator.	Proposed change to delete Policy HC-D6 as a consequence of the removal of S106 thresholds for affordable housing from Planning Practice Guidance.
437	Page 307, indicator for CC-S7, CC-D2, CC-D5	Contextual Indicator Length and % <u>Percentage</u> of monitored rivers achieving 'good' or 'high' ecological status (under the Water Framework Directive)	Amendment to the monitoring indicators to be consistent with Environment Agency monitoring – representation number 0033/04
438	Page 307	Delete reference to HC-D6 for the penultimate indicator.	Proposed change to delete Policy HC-D6 as a consequence of the removal of S106 thresholds for affordable housing from Planning Practice Guidance.
439	Page 309	Delete reference to HC-D6 for the first and sixth indicator.	Proposed change to delete Policy HC-D6 as a consequence of the removal of S106 thresholds for affordable housing from Planning Practice Guidance.

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Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
440	Pages 303, 305, 309 and 310	Change numbering to the following policy references: HC-D 67 HC-D 78 HC-D 89 HC-D 910 HC-D 101 HC-D 112 HC-D 123 HC-D 134 HC- D 145 HC-D 156 HC-D 167 HC-D 178 HC-D 189 HC-D 1920	Proposed changes to policy numbering as a result of the proposed deletion of Policy HC-D6.

Section 12: Annex 1: The Conduct of Archaeological Work and Historic Building Recording
No proposed changes.

Section 13: Annex 2: Rural Land Based Worker Dwellings

Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
441	Page 322, para. 13.2	This Annex provides additional information and guidance in relation to the following policies: a) HC-D 67 Conversions to Dwellings in the Open Countryside b) HC-D 78 New Build Dwellings in the Open Countryside c) HC-D 89 Rural Workers	Proposed changes to policy numbering as a result of the proposed deletion of Policy HC-D6.

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Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
		d) HC-D 1011 Residential Caravans	
442	Page 322, para. 13.3	<i>Change policy numbering:</i> HC-D 910 'Succession Farming – Second Dwellings on Established	Proposed changes to policy numbering as a result of the proposed deletion of Policy HC-D6.
443	Page 323, para. 13.7	<i>Change policy numbering:</i> Policy HC-D 89	Proposed change to policy numbering as a result of the proposed deletion of Policy HC-D6.
444	Page 323, para. 13.8 d)	<i>Change policy numbering:</i> HC-D 134 Subdivision of Existing Dwellings	Proposed change to policy numbering as a result of the proposed deletion of Policy HC-D6.
445	Pages 323-4, para. 13.11	<i>Change policy numbering:</i> policy HC-D 910 Succession Farming – Second Dwellings on Established Farms.	Proposed change to policy numbering as a result of the proposed deletion of Policy HC-D6.
446	Page 324, para. 13.17	Rural worker dwellings should be of a size commensurate with the established functional requirement. Policy HC-D 89 requires that the net floorspace <u>gross internal area</u> will be 930sqm or less unless the Authority is satisfied that the needs of the holding require a larger dwelling. Larger dwellings should be of a size commensurate with the needs of the holding, and should not be expensive to construct in relation to the income it can sustain in the long-term. It is the requirements of the enterprise, rather than those of the owner or occupier, that are relevant in determining the size of a dwelling larger than 930sqm <u>gross internal area</u> net internal floorspace .	Proposed change to policy numbering as a result of the proposed deletion of Policy HC-D6. Change in terminology to reflect the Technical Housing Standards – nationally described space standards.
447	Page 325, para. 13.19	<i>Change policy numbering:</i> policy HC-D 101 Residential Caravans.	Proposed change to policy numbering as a result of the

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Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
			proposed deletion of Policy HC-D6.
448	Page 325, para. 13.23	<i>Change policy numbering:</i> policy HC-D11 2 Replacement of Rural Workers Occupancy Conditions.	Proposed change to policy numbering as a result of the proposed deletion of Policy HC-D6.
449	Page 325-6, para. 13.24	<i>Change policy numbering:</i> policy HC-D 89 Rural Workers.	Proposed change to policy numbering as a result of the proposed deletion of Policy HC-D6.

Section 14: Annex 3: Important Open Space in Allerford and Luccombe

Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
450	Page 327, para. 14.1	The following maps illustrate areas of important open space for recreation and visual amenity within the settlements of Allerford and Luccombe. These settlements are not <u>identified as named settlements within the settlement hierarchy spatial strategy</u> , listed in policy GP3 Spatial Strategy <u>and Table 3.1</u> , and therefore are not represented on the Policies Map and associated Inset Maps.	Point of clarification.

Section 15: Glossary

Ref	Page/ Policy/ Paragraph	Proposed Change	Justification				
451	Page 328	<p>Insert the following text in the Glossary Table after ‘affordable housing’:</p> <table border="1"> <thead> <tr> <th>Term</th> <th>Definition</th> </tr> </thead> <tbody> <tr> <td>All Abilities</td> <td><u>An inclusive approach referring to opportunities for people of all abilities, including those with disabilities.</u></td> </tr> </tbody> </table>	Term	Definition	All Abilities	<u>An inclusive approach referring to opportunities for people of all abilities, including those with disabilities.</u>	To reflect comments made in representation number 0065/01
Term	Definition						
All Abilities	<u>An inclusive approach referring to opportunities for people of all abilities, including those with disabilities.</u>						
452	Page 330	<p>Insert the following text in the Glossary Table before ‘Cumulative landscape effects’:</p> <table border="1"> <thead> <tr> <th>Term</th> <th>Definition</th> </tr> </thead> <tbody> <tr> <td><u>Community Land Trust (CLT)</u></td> <td>Community Land Trusts are local organisations set up and run by ordinary people to develop and manage homes as well as other assets important to that community, like community enterprises, food growing or workspaces. The CLT’s main task is to make sure these homes are genuinely affordable, based on what people actually earn in their area, not just for now but for every future occupier.^x</td> </tr> </tbody> </table> <p><i>Insert footnote:</i> ^x <u>As defined by the National Community Land Trust Network</u> http://www.communitylandtrusts.org.uk/what-is-a-clt</p>	Term	Definition	<u>Community Land Trust (CLT)</u>	Community Land Trusts are local organisations set up and run by ordinary people to develop and manage homes as well as other assets important to that community, like community enterprises, food growing or workspaces. The CLT’s main task is to make sure these homes are genuinely affordable, based on what people actually earn in their area, not just for now but for every future occupier. ^x	For clarification.
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453	Page 330	<p>Insert the following text in the Glossary Table before ‘Cumulative landscape effects’:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Term</th> <th style="text-align: center;">Definition</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;"><u>Cultural Heritage</u></td> <td><u>Inherited assets which people identify and value as a reflection and expression of their evolving knowledge, beliefs and traditions, and of their understanding of the beliefs and traditions of others. This includes all physical assets of the historic environment which are the surviving remains of past human activity.</u></td> </tr> </tbody> </table>	Term	Definition	<u>Cultural Heritage</u>	<u>Inherited assets which people identify and value as a reflection and expression of their evolving knowledge, beliefs and traditions, and of their understanding of the beliefs and traditions of others. This includes all physical assets of the historic environment which are the surviving remains of past human activity.</u>	To reflect comments made in representation number 0120/02
Term	Definition						
<u>Cultural Heritage</u>	<u>Inherited assets which people identify and value as a reflection and expression of their evolving knowledge, beliefs and traditions, and of their understanding of the beliefs and traditions of others. This includes all physical assets of the historic environment which are the surviving remains of past human activity.</u>						
454	Page 331	<p>Insert the following text in the Glossary Table after ‘Green Infrastructure’:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Term</th> <th style="text-align: center;">Definition</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;"><u>Gross Internal Area</u></td> <td> <p>The Gross Internal Area of a dwelling is defined as the total floor space measured between the internal faces of perimeter walls that enclose the dwelling. This includes partitions, structural elements, cupboards, ducts, flights of stairs and voids above stairs. The Gross Internal Area should be measured and denoted in square metres (m2).^x</p> <p>It excludes the floor area of any general store, dustbin store, fuel store, garage or balcony; any area in rooms with sloping ceilings to the extent that the height of the ceiling does not exceed 1.5m; and any lobby/porch open to the air.</p> </td> </tr> </tbody> </table> <p><i><u>Insert footnote:</u></i> <u>^x DCLG (March 2015) Technical Housing Standards – nationally described space standards</u></p>	Term	Definition	<u>Gross Internal Area</u>	<p>The Gross Internal Area of a dwelling is defined as the total floor space measured between the internal faces of perimeter walls that enclose the dwelling. This includes partitions, structural elements, cupboards, ducts, flights of stairs and voids above stairs. The Gross Internal Area should be measured and denoted in square metres (m2).^x</p> <p>It excludes the floor area of any general store, dustbin store, fuel store, garage or balcony; any area in rooms with sloping ceilings to the extent that the height of the ceiling does not exceed 1.5m; and any lobby/porch open to the air.</p>	Change to reflect the Technical Housing Standards – nationally described space standards. These standards are proposed to be included in policy HC-S2 A Balanced Housing Stock.
Term	Definition						
<u>Gross Internal Area</u>	<p>The Gross Internal Area of a dwelling is defined as the total floor space measured between the internal faces of perimeter walls that enclose the dwelling. This includes partitions, structural elements, cupboards, ducts, flights of stairs and voids above stairs. The Gross Internal Area should be measured and denoted in square metres (m2).^x</p> <p>It excludes the floor area of any general store, dustbin store, fuel store, garage or balcony; any area in rooms with sloping ceilings to the extent that the height of the ceiling does not exceed 1.5m; and any lobby/porch open to the air.</p>						

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Ref	Page/ Policy/ Paragraph	Proposed Change	Justification				
455	Page 331	<p>Insert the following text in the Glossary Table after ‘Historic environment’:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Term</th> <th style="text-align: center;">Definition</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;"><u>Historic settlement core</u></td> <td><u>The historic settlement core includes the historic settlement based on Tithe Maps and the Ordnance Survey 1st Edition maps – the defined area may not necessarily survive above ground but there may be remains below ground.</u></td> </tr> </tbody> </table>	Term	Definition	<u>Historic settlement core</u>	<u>The historic settlement core includes the historic settlement based on Tithe Maps and the Ordnance Survey 1st Edition maps – the defined area may not necessarily survive above ground but there may be remains below ground.</u>	To reflect comments made in representation number 0061/06
Term	Definition						
<u>Historic settlement core</u>	<u>The historic settlement core includes the historic settlement based on Tithe Maps and the Ordnance Survey 1st Edition maps – the defined area may not necessarily survive above ground but there may be remains below ground.</u>						
456	Page 332	<p>Insert the following text in the Glossary Table after ‘Local Wildlife sites (LWS)’:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Term</th> <th style="text-align: center;">Definition</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;"><u>Major development</u></td> <td><u>The Local Plan includes a policy (GP2 Major Development) which provides an interpretation of major development in the context of paragraph 116 of the NPPF, which is considered to be of a scale that is context-specific and a matter of planning judgement, i.e. it would exceed the local-scale development to address the social and economic needs of Exmoor’s communities, and would be considered to also have potential adverse impacts on the National Park’s statutory purposes. However, the Development Procedure Order also provides a definition of major development in terms of the classification of planning applications – development which falls into this category of planning application will not always meet the definition set out in policy GP2 and the supporting text.^x</u></td> </tr> </tbody> </table>	Term	Definition	<u>Major development</u>	<u>The Local Plan includes a policy (GP2 Major Development) which provides an interpretation of major development in the context of paragraph 116 of the NPPF, which is considered to be of a scale that is context-specific and a matter of planning judgement, i.e. it would exceed the local-scale development to address the social and economic needs of Exmoor’s communities, and would be considered to also have potential adverse impacts on the National Park’s statutory purposes. However, the Development Procedure Order also provides a definition of major development in terms of the classification of planning applications – development which falls into this category of planning application will not always meet the definition set out in policy GP2 and the supporting text.^x</u>	To reflect comments made in representation number 0044/01.
Term	Definition						
<u>Major development</u>	<u>The Local Plan includes a policy (GP2 Major Development) which provides an interpretation of major development in the context of paragraph 116 of the NPPF, which is considered to be of a scale that is context-specific and a matter of planning judgement, i.e. it would exceed the local-scale development to address the social and economic needs of Exmoor’s communities, and would be considered to also have potential adverse impacts on the National Park’s statutory purposes. However, the Development Procedure Order also provides a definition of major development in terms of the classification of planning applications – development which falls into this category of planning application will not always meet the definition set out in policy GP2 and the supporting text.^x</u>						

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		<p><i>Insert footnote:</i> ^x<u>The formal definition of ‘major development’ (for the purposes of consultation on planning applications) is set out in The Town and Country Planning (Development Procedure) (England) Order 2010, and includes – minerals development (i.e. mining, etc.); waste development; housing development of more than 10 units or 0.5 hectares; new building(s) with floorspace 1,000 sqm or more; development of land 1 hectare or more.</u></p>					
457	Page 332	<p>Insert the following text in the Glossary Table after ‘material considerations’:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Term</th> <th style="text-align: center;">Definition</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;"><u>Named settlement(s)</u></td> <td><u>This term represents the settlements identified in policy GP3 Spatial Strategy, and Table 3.1. These settlements have been identified as locations which are most suitable for new development.</u></td> </tr> </tbody> </table>	Term	Definition	<u>Named settlement(s)</u>	<u>This term represents the settlements identified in policy GP3 Spatial Strategy, and Table 3.1. These settlements have been identified as locations which are most suitable for new development.</u>	To reflect comments made in representation number 0043/32.
Term	Definition						
<u>Named settlement(s)</u>	<u>This term represents the settlements identified in policy GP3 Spatial Strategy, and Table 3.1. These settlements have been identified as locations which are most suitable for new development.</u>						

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458	Page 333	<p>Insert the following text in the Glossary Table before 'Rural exception sites':</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Term</th> <th style="text-align: center;">Definition</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;"><u>Registered Provider</u></td> <td>The term (private) Registered Provider of social housing is the generic name for the providers of social housing (social landlords) not covered by local authorities. This term is commonly used to describe 'housing associations' which were also referred to as Registered Social Landlords in previous editions. Registered Providers are defined in section 80 of the Housing and Regeneration Act 2008.</td> </tr> </tbody> </table>	Term	Definition	<u>Registered Provider</u>	The term (private) Registered Provider of social housing is the generic name for the providers of social housing (social landlords) not covered by local authorities. This term is commonly used to describe 'housing associations' which were also referred to as Registered Social Landlords in previous editions. Registered Providers are defined in section 80 of the Housing and Regeneration Act 2008.	For clarification.
Term	Definition						
<u>Registered Provider</u>	The term (private) Registered Provider of social housing is the generic name for the providers of social housing (social landlords) not covered by local authorities. This term is commonly used to describe 'housing associations' which were also referred to as Registered Social Landlords in previous editions. Registered Providers are defined in section 80 of the Housing and Regeneration Act 2008.						

Policies Maps

Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
459	Maps 22 and 23 (east and west of Exmoor National Park), Inset Map 1 Barbrook, Inset Map 5 Challacombe, Inset Map 9 Exford, Inset Map 17 Simonsbath, Inset Map 21 Wootton Courtenay.	<p><i>Insert the zones relating to the International Dark Sky Reserve on to the main Policies Map and Inset Maps 9, 17 and 21, as follows:</i></p> <p>Dark Sky Reserve – Core Zone Dark Sky Reserve – Critical Buffer Zone</p> <p>(See Appendix 6)</p>	Clarification following 2015 reporting on the IDSR – the reserve area is the core zone rather than the whole of the National Park.
460	Maps 22 and 23 (east and west of	Change the maps relating to 'local freight routes' to show they are red only, and 'county freight routes' are brown.	Clarification of the Exmoor Route Network.

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Ref	Page/ Policy/ Paragraph	Proposed Change	Justification
	Exmoor National Park), Inset Map 5 Challacombe, Inset Map 6 Cutcombe and Wheddon Cross, Inset Map 9 Exford, Inset Map 17 Simonsbath, Inset Map 21 Wootton Courtenay.	(See Appendix 6)	