



EXMOOR

NATIONAL PARK

EXMOOR NATIONAL PARK AUTHORITY
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21 September 2023

EXMOOR NATIONAL PARK AUTHORITY

To: All Members of the Exmoor National Park Authority

A meeting of the Exmoor National Park Authority will be held in the **Committee Room, Exmoor House, Dulverton** on **Tuesday, 3 October 2023 at 10.00 am.**

Please Note: To better manage Authority business, Agenda items relating to the Authority's role as sole **local planning authority** for the National Park area, including determination of planning applications, will commence at **1.30 pm.**

The meeting will be open to the press and public subject to the passing of any resolution under s.100(A)(4) of the Local Government Act 1972.

There is Public Speaking at this meeting, when the Chairperson will allow members of the public two minutes each to ask questions, make statements, or present a petition relating to any item relevant to the business of the Authority or relating to any item on the Agenda. Anyone wishing to ask questions should notify the Corporate Support Officer as soon as possible, or at the latest by 4pm on the working day before the meeting of the agenda item on which they wish to speak, indicating a brief summary of the matter or matters to be raised (contact Judy Coles on 01398 322250 or email jcoles@exmoor-nationalpark.gov.uk).

The meeting will be **recorded**. By entering the Authority's Committee Room and speaking during Public Speaking you are consenting to being recorded. We will make the recording available via our website for members of the public to listen to and/or view, within 72 hours of the meeting taking place.

Members of the public may use Facebook and Twitter or other forms of social media to report on proceedings at this meeting. Anyone wishing to film part or all of the proceedings may do so unless the press and public are excluded for that part of the meeting or there is good reason not to do so. As a matter of courtesy, anyone wishing to film proceedings is asked to advise the Chairperson so that those present may be made aware.

(The agenda and papers for this meeting can be downloaded from the National Park Authority's website www.exmoor-nationalpark.gov.uk).

Sarah Bryan
Chief Executive

AGENDA

The meeting will be chaired by Miss A V Davis, Chairperson of the Authority.

1. Apologies for Absence

2. Declarations of Interest/Lobbying of Members/Unaccompanied Site Visits

Members are asked to declare:-

- (1) any interests they may have in relation to items on the agenda for this meeting;
- (2) any lobbying by anyone concerned with a planning application and any unaccompanied site visits where contact has been made with any person concerned with a planning application.

(NB. When verbally making these declarations, members are also asked to complete the Disclosures at Meetings form – attached for members only).

3. Chairperson's Announcements

4. **Minutes**
 - (1) To approve as a correct record the Minutes of the meetings of the Authority held on 5 September 2023 (Item 4)
 - (2) To consider any Matters Arising from those Minutes.

5. **Public Speaking:** The Chairperson will allow members of the public to ask questions, make statements, or present a petition. Questions of a general nature relevant to the business of the Authority can be asked under this agenda item. Any questions specific to an agenda item can be posed when that item is considered subject to the discretion of the person presiding at the meeting.

6. **External Audit Plan For The Year Ending 31 March 2023:** To consider the report of the Chief Finance Officer (Item 6)

7. Personnel Update

Leavers:

29/10/2023 – Seasonal Information Advisors – end of seasonal contracts

8. Any Other Business of Urgency .

Agenda items relating to the Authority's role as sole local planning authority for the National Park area including determination of planning applications. This section of the meeting will commence at 1.30 pm and will be chaired by Mr S J Pugsley, Deputy Chairperson (Planning). If the Deputy Chairperson (Planning) is absent, the Deputy Chairperson of the Authority shall preside.

9. **Development Management:** To consider the report of the Head of Planning and Sustainable Development on the following:-

Agenda Item	Application No.	Description	Page Nos.
9.1	6/29/23/006	Proposed demolition of existing bungalow and sheds. Erection of replacement eco-bungalow and new shed - Hurlstone Bungalow, Allerford, Minehead, TA24 8HJ	1 – 28
9.2	62/50/23/002	Proposed construction of 6no. dwellings with associated landscaping and highways works including new road access to Parracombe Lane - Land West of Parracombe Lane, Easting: 267024, Northing: 145131	29 - 64

- 10. Application Decisions Delegated to the Chief Executive:** To note the applications determined by the Chief Executive under delegated powers (Item 10).
- 11. Site Visits:** To arrange any site visits agreed by the Committee (the reserve date being Friday, 3 November 2023 (am)).

Further information on any of the reports can be obtained by contacting the National Park Authority at the address and telephone numbers at the top of the agenda. Details of the decisions taken at this meeting will be set out in the formal Minutes which the Committee will be asked to approve as a correct record at its next meeting. In the meantime, details of the decisions can be obtained from Judy Coles, Corporate Support Officer, at Exmoor House.

ITEM 4

EXMOOR NATIONAL PARK AUTHORITY

MINUTES of the Meeting of the Exmoor National Park Authority held on Tuesday, 5 September 2023 at 10.00am in the Committee Room, Exmoor House, Dulverton.

PRESENT

Miss A V Davis (Chairperson)
Mr R Milton (Deputy Chairperson)
Mr S J Pugsley (Deputy Chairperson Planning)

Mr L Baker	Dr M Kelly
Mr T Butt Philip	Mr M Kravis
Mrs M Chilcott	Mrs F Nicholson
Mr M Ellicott	Mrs F Smith
Mr D Elson	Mr N Thwaites
Mr B Geen	Mrs L Williams
Mr J Holtom	Mr J Yabsley

Apologies for absence were received from Mr A Bray, Mrs C Lawrence, Mr J Patrinos, Mrs E Stacey and Dr S Warren

24. DECLARATIONS OF INTEREST:

- In relation to Item 6 – Farming in Protected Landscapes Programme – Year 2 Update, the following interests were declared:
 - Mr Milton declared an interest as Chair of the FiPL Assessment Panel and as an Exmoor Farmer
 - Mr Holtom declared an interest as Secretary of Brendon Commons Council
 - Mr Geen declared an interest as an Exmoor Farmer
 - Mr Elson declared an interest as a member of the FiPL Assessment Panel and the Authority's representative on the North Devon Area of Outstanding Natural Beauty Partnership.
- In relation to Item 12.5 - Listed building consent for the proposal replacement of 5no. timber sash windows - Verwill Farm, Combe Martin, Ilfracombe, EX34 0PE, Mr Elson declared a pecuniary interest as the application related to his property. He advised that he would withdraw from the Planning Meeting in its entirety.

25. CHAIRPERSON'S ANNOUNCEMENTS: Mrs Laura Williams was welcomed to her first meeting as a Secretary of State appointed Member.

26. MINUTES

- Confirmation:** The **Minutes** of the Authority's meeting held on 4 July 2023 were agreed and signed as a correct record.
- Matters arising:** There were no matters arising.

27. PUBLIC SPEAKING: See Minute 33, 34 and 35 for details of public speakers.

Mr Pugsley left the meeting

28. FARMING IN PROTECTED LANDSCAPES PROGRAMME – YEAR 2 UPDATE

The Authority considered the [report](#) of the Head of Conservation and Access

The Authority's Consideration

The Committee thanked the Conservation Manager and his team for the successful delivery of the Farming in Protected Landscapes Programme over the past two years.

Dr Kelly felt that the way the Farming in Protected Landscapes (FiPL) programme had been delivered on Exmoor was a success story and asked how the take up and range of projects supported compared with other Protected Landscapes. Officers responded that there was no direct comparison between Protected Landscapes, but anecdotally there were some differences where Exmoor had focused on action on the ground and smaller projects with more tangible outcomes, compared to other places where larger, more conceptual schemes had been funded. Exmoor had been successful in allocating all the funding in Year 1 and were able to ask for additional funding in the light of this, which had meant more money being able to support local delivery.

In response to a query from Mrs Smith, it was confirmed that full details of all FiPL projects undertaken was held for audit purposes and information regarding specific schemes that individual landowners had sought funding for could be added to future reports. It was confirmed that the Rural Payments Agency could potentially carry out an official audit on the programme.

Mr Elson commented that as a member of both the Exmoor FiPL Assessment Panel, and the ENPA representative on the North Devon Area of Outstanding Natural Beauty Partnership (NDAONB), he was aware of how the schemes were being implemented in two Protected Landscapes. A brief summary of the types of schemes being supported by NDAONB was provided and it was suggested that more might be done to share learning between the National Park Authority and neighbouring AONB's.

Furthermore, he thanked the FiPL Officers for their outreach work to ensure early interaction with applicants and noted that they were encountering more overlaps with other forms of funding and anticipated this could become a bigger issue going forwards. Mr Elson welcomed the report and suggested it provided an opportunity to consider whether FiPL was delivering what it was designed for, whether it was supporting the transition to changes in farming in Protected Landscapes, and questioned whether the Authority were taking a sufficiently holistic view, for example in integrating it with delivery of other priorities such as the Nature Recovery Vision.

Mrs Chilcott expressed surprise that there was not more of an educational element within the funding as she considered this could create a legacy which would add value in future years. Officers confirmed that there were projects which supported education outcomes such as farm visits and peer to peer learning, but these were not specifically highlighted in the report.

In relation to other points raised by Mrs Chilcott, it was confirmed that there was a pipeline of projects, with over 200 enquiries so far in 2023, but it was anticipated that some proposals would not end up coming forward. Confirmation was provided that Officers did provide advice on crossovers between other grant funding to ensure that the FiPL funding could be most effectively used, particularly avoiding overlap with funding from Countryside Stewardship.

Mrs Williams highlighted that there were some great stories to share through local campaigns and outreach, for example reporting on the percentage of land within the National Park that had benefited from FiPL funding. It was confirmed that Officers work closely with the Communications Officer to tell the stories and to promote the scheme on social media.

In response to a query from Mr Kravis it was confirmed that the minimum grant amount was £250 but that most projects were applying for at least £2,000 to justify the information required during the application process.

Mr Milton emphasised the value of having FiPL funding particularly given the pressure on other resources to deliver National Park purposes and he was pleased to see that all the initial funding had been spent, and that additional funds had been secured for Exmoor. The FiPL Assessment Panel were keen that the funding was spread widely to benefit as many people as possible and he considered that the successful delivery of the scheme needed to continue to be communicated to Defra to encourage ongoing funding.

RESOLVED:

- (1) To welcome the additional funding from Defra in 2024/25 in order to deliver an additional year of the Farming in Protected Landscapes programme.
- (2) To agree to the amendment in the Defra programme rules to raise the threshold on Officer approved projects from £5,000 to £10,000.
- (3) To agree to fill the Authority Member vacancy on the Local Assessment Panel.

Mr Pugsley returned to the meeting

29. APPROVAL OF THE ORGANISATIONAL DEVELOPMENT STRATEGY 2023-2026, OUR PEOPLE, OUR CULTURE

The Authority considered the [report](#) of the Head of Strategy and Performance

The Authority's Consideration

The Head of Strategy and Performance presented a summary of the report and advised that the HR Officer, Ellie Woodcock, had been responsible for the bulk of the work in pulling the report together and would be key in implementing and monitoring the actions.

A number of queries were raised by Members and the following confirmation was provided:-

- Aim 2 – Introduce regular remote working at other sites for Leadership Team to engage with off-site staff – was currently red as it had not yet been agreed how this would be monitored going forwards, however visits were already being made.
- Consideration would be given to ways to further encourage staff to provide feedback and a flow of ideas
- Aim 4 – Review our Performance Improvement Policy – was currently amber, as a programme of training for Managers was due to be implemented over the next months.

- The Authority's Whistleblowing policy was accessible to staff via the Authority's SharePoint site, along with all other policies.
- The Chairperson regularly liaised with the HR Officer regarding any emerging issues, particular in relation to staff welfare.
- Support was given to staff on fixed term contracts as they were drawing to a close, but no specific information had emerged regarding any impact on motivation and wellbeing.
- The HR Officer produced an annual report which provided a summary of employee demographics and key indicators. The Equality, Diversity and Inclusion Group were currently working on an EDI Strategy.
- The Authority provided confidential employee assistance support via Mindful Employer
- It was confirmed that all job vacancies were advertised both locally and nationally and provided detailed criteria of the relevant skills and experience being sought.

In resolving to accept the recommendations contained in the report, the Chairperson requested that an additional recommendation be added to formally thank the HR Officer for their work.

RESOLVED:

- (1) To approve the Organisational Development Strategy 2023-2026.
- (2) To formally thank Mrs Woodcock, HR Officer, for all her efforts on behalf of the Authority.

30. ANNUAL APPOINTMENTS

The Authority considered the [report](#) of the Head of Strategy and Performance

The Authority's Consideration

The meeting noted that several Members had expressed interest in certain groups after the Authority report had been published, which filled the vacancies that had been shown in relation to the Exmoor Learning and Engagement Network, Exmoor Moorland & Farming Board, FiPL Assessment Panel and Rural Enterprise Exmoor Group.

Two groups were oversubscribed and Mr Holtom and Mrs Chilcott volunteered to step down from the Exmoor Woodland and Forestry Advisory Group and the External Funding Working Group respectively.

This left a vacancy for the Exmoor Landscape Advisory Group and Mr Kravis volunteered to sit on this group.

RESOLVED:

- (1) To make appointments to all operational Committees, partnership boards, working groups and outside bodies as listed in the Appendix to the report, or as agreed by the Authority Committee.

Exmoor Historic Environment Advisory Group: Mr J Holtom, Dr M Kelly, Mr S Pugsley

Exmoor Learning and Engagement Network: Mrs C Lawrence, Mrs F Smith, Dr S Warren, Mrs L Williams

Exmoor Moorland and Farming Board: Mr L Baker, Mr J Holtom, Mr R Milton, Mr J Yabsley

Exmoor Nature Conservation Advisory Panel – Mr B Geen, Mr J Holtom, Mrs F Smith, Dr S Warren, Mrs L Williams

Exmoor Woodland and Forestry Advisory Group: Mr N Thwaites, Mr J Yabsley

Equality, Diversity & Inclusion Group – Mr D Elson, Miss E Stacey, Dr S Warren, Mrs L Williams

External Funding Working Group Mr A Bray, Mr M Ellicott, Miss E Stacey, Mrs L Williams

Farming in Protected Landscapes Assessment Panel – Mr D Elson, Mr J Holtom, Mr R Milton, Dr S Warren

Planning Policy Advisory Group – Miss A V Davis, Mr R Milton, Mr S Pugsley, Mr A Bray, Mr M Ellicott, Mr B Geen, Mr J Holtom, Dr M Kelly, Mrs F Nicholson

Rural Enterprise Exmoor Group – Mr A Bray, Mrs M Chilcott, Miss A V Davis

UK National Parks Chairs Forum – Miss A V Davis, Mr R Milton (sub)

Campaign for National Parks – Mr D Elson

Exmoor Hill Farming Network - Mr M Ellicott, Mr J Yabsley

Exmoor Landscape Advisory Panel – Dr M Kelly, Mr M Kravis

Exmoor Rural Housing Network – Mr M Ellicott, Mr B Geen, Mr J Holtom, Mrs F Nicholson, Mr S Pugsley

North Devon AONB Partnership – Mr D Elson

Visit Exmoor CIC – Mrs L Williams

Independent Person – Mr M Riggulsford

- (2) To agree that Members appointed to the working groups and annual bodies provide an annual report on so that all Members are updated on the work of these groups. This will be co-ordinated by Officers and reported to the Annual Meeting.

31. AUTHORITY MEETINGS SCHEDULE FOR 2024

The Authority considered the [report](#) of the Head of Strategy and Performance

The Authority's Consideration

It was noted that the Governance Review was still ongoing, and confirmation was provided that there was sufficient flexibility in the 2024 meetings schedule to allow for the outcome of that review, but that it was important for many Members to set aside dates in their diary for Authority business.

RESOLVED: To adopt the schedule of meetings of the Authority and its Committees for 2024, attached at Appendix 1 to the report

- 32. PERSONNEL UPDATE:** The Authority noted the recent staff changes as set out on the agenda.

The meeting closed for recess at 11.34pm

Mr L Baker and Mr D Elson left the meeting

Items relating to the Authority's role as sole local planning authority for the National Park area including determination of planning applications. This section of the meeting was chaired by Mr S J Pugsley, Deputy Chairperson (Planning)

The meeting reconvened at 1.30pm

DEVELOPMENT MANAGEMENT

- 33. Application No: 62/11/22/019**

Location: The Blue Ball Inn Countisbury, Lynton, EX35 6NE

Proposal: Proposed erection of 4no. linked cabins for use as holiday lets

The Authority considered the [report](#) of the Head of Planning and Sustainable Development.

Public Speaking

1. Mr P Mears, Peregrine Mears Architects - Applicant's Agent

The Authority's Consideration

Several Members expressed disappointment that the design was not more accessible, however did acknowledge that the site was steep, and that it would be difficult to achieve this aim with the topography of the site.

Mrs Smith asked whether it was possible to condition times for closing of the shutters to prevent light spillage and also whether shutters were a common feature in the National Park. The Head of Planning and Sustainable Development suggested such a condition on the shutters would fail the reasonableness and enforceability tests as set out in the National Planning Policy Framework. However, Officers had considered the impact of the development on the Dark Night Sky and mitigation measures such as the setback position of the windows had been negotiated and were considered reasonable. It was confirmed that shutters were not a common design feature within the National Park but were considered acceptable when considered in the context of the development.

Mr Ellicott said that he could not support the design despite all of the mitigation measures put forward, due to the visual impact at the front of the units, that they were not accessible and he considered the impact of the construction outweighed the benefits of having a grass roof.

Mrs Nicholson asked if some control over reinstatement of the area behind the cabins after the works were completed could be secured and proposed a motion to approve the Application, subject to a condition to request a Construction Management Plan be approved by the Local Planning Authority. Mr Kravis seconded the motion and when put to the vote, the majority of Members resolved to grant planning permission.

RESOLVED: To grant planning permission subject to the conditions set out in the report, and the addition of a condition requiring the submission of a Construction Management Plan.

34. Application No: 6/10/23/014

Location: The Horse & Crook, 19 High Street, Dunster, Minehead, TA24 6SF

Proposal: Resubmission of refused applications 6/10/21/107 and 6/10/22/102 for proposed change of use of ground floor shop to form part of single residential use of the premises

The Authority considered the **report** of the Head of Planning and Sustainable Development.

Public Speaking

1. Mr T Burton, Tim Burton Planning – Applicant’s Agent

The Authority’s Consideration

Members discussed the viability of the business in the light of the Parish Council’s concerns. It was noted that the Applicant had marketed the property without success, in excess of the timeframe stipulated in Policy SE-D2 (Safeguarding Existing Employment Land and Buildings) of the Exmoor National Park Authority Local Plan.

The Committee did not wish to set a precedent which might encourage similar applications being put forward in the future. However, in this particular instance and for the specific reasons set out in the Officer report, Members considered that granting planning permission was acceptable, subject to strict conformity with the conditions and informative set out in the report.

RESOLVED: To grant planning permission subject to the conditions set out in the report.

Mr Kravis left the meeting during the Member debate and therefore did not vote

35. Application No: 6/3/23/007

Location: Land at Bryants Hill, Brompton Regis, Dulverton

Proposal: Proposed erection of an agricultural building (13.5m x 9.3m)

The Authority considered the **report** of the Head of Planning and Sustainable Development.

Public Speaking

1. Mr S Luxton, Applicant

The Authority’s Consideration

Dr Kelly advised the meeting that he felt uncomfortable with the lack of clarity around the information contained in the Design and Access statement and the separation of the land. It was noted in the debate that Planning Officers had attempted to engage with the Applicant but had not received the information requested.

A motion to defer the application was put forward by Dr Kelly and seconded by Miss Davis. The Head of Planning and Sustainable Development confirmed that, due to insufficient information being supplied, he was prepared to defer the application for

two Committee cycles in order to enable the Applicant and Agent to supply the outstanding information requested.

RESOLVED: To defer determination of the Application for two Committee cycles to allow the Applicant and Agent to provide the additional information requested. Members requested that the Application come back before the Authority for determination no later than the November 2023 Committee.

36. Application No: 62/41/23/016LB

Location: Hillside House, 22 Watersmeet Road, Lynmouth, EX35 6EP

Proposal: Listed Building Consent for the proposed alterations to windows, roof, heating and electrical systems, internal areas and removal of oil tank

The Authority considered the [report](#) of the Head of Planning and Sustainable Development.

RESOLVED: To grant planning permission subject to the conditions set out in the report.

37. Application No: 62/19/23/002LB

Location: Verwill Farm, Combe Martin, Ilfracombe, EX34 0PE

Proposal: Listed building consent for the proposal replacement of 5no. timber sash windows

The Authority considered the [report](#) of the Head of Planning and Sustainable Development.

RESOLVED: To grant planning permission subject to the conditions set out in the report.

38. Application No: 6/40/23/007DC

Location: River Barle (Easting 285773, Northing 133879), Below Great Bradley, Withypool, Minehead, Somerset

Proposal: Proposed discharge of condition 3 (Environmental Management Plan) of approved application 6/40/22/102

The Authority considered the [report](#) of the Head of Planning and Sustainable Development.

RESOLVED: To approve the details and discharge Condition 3 of planning permission 6/40/22/102.

39. APPLICATION DECISIONS DELEGATED TO THE CHIEF EXECUTIVE: The Authority noted the [decisions of the Chief Executive determined under delegated powers](#).

40. SITE VISITS: It was anticipated that a Site Visit would take place on the morning of Friday, 29 September and further details would be provided to Members in due course.

The meeting closed at 2.44pm

(Chairperson)

EXMOOR NATIONAL PARK AUTHORITY

3 October 2023

EXTERNAL AUDIT PLAN FOR THE YEAR ENDING 31 MARCH 2023

Report of the Chief Finance Officer

Purpose of Report: To present to Members the Grant Thornton Audit Plan.

RECOMMENDATION: The Authority is recommended to receive the report and associated Appendix.

Authority priority: Getting best value from our resources and improving our performance – Finance and Performance - Financial Management.

Legal and equality implications: Local Government Act 2003, Parts 1-3 (Capital Finance, Financial Administration and Grants), Sections 1-39, Accounts and Audit Regulations 2015, Sections 3 (Responsibility for Internal Control), 4 (Accounting Records and Control Systems) 5 (Internal Audit), and 6 (Review of Internal Control System).

The equality and human rights impact of the recommendations of this report have been assessed as having no adverse impact on any particular group or individual.

Financial and risk implications: Provision has been made in the 2023/24 budget to cover the costs of both external and internal audit. Additional resources should be available to meet the increased cost of External Audit.

Climate change response: Nothing contained within this report will impact upon the Authority's ability to meet its climate change targets.

1. External Audit

- 1.1 Grant Thornton UK LLP is our appointed auditor, appointed to audit finance and governance arrangements within the Authority. They have provided a report which details their progress in delivering their responsibilities as External Auditors, their view of materiality and risks identified.
- 1.2 Barrie Morris, Engagement Lead and Liam Royle, Engagement Manager are responsible for undertaking the relevant work. They are endeavouring to present the report themselves electronically and this is attached at Appendix 1.

Ben Barrett
Chief Finance Officer
September 2023

Exmoor National Park Authority 2022-23 Audit Plan

Year ending 31 March 2023

September 2023



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The contents of this report relate only to the matters which have come to our attention, which we believe need to be reported to you as part of our audit planning process. It is not a comprehensive record of all the relevant matters, which may be subject to change, and in particular we cannot be held responsible to you for reporting all of the risks which may affect the Authority or all weaknesses in your internal controls. This report has been prepared solely for your benefit and should not be quoted in whole or in part without our prior written consent. We do not accept any responsibility for any loss occasioned to any third party acting, or refraining from acting on the basis of the content of this report, as this report was not prepared for, nor intended for, any other purpose.

1. Key matters

National context

For the general population, rising inflation rates, in particular for critical commodities such as energy, food, fuel and increasing bank interest rates, is proving challenging for many households, including those in employment. At a national government level, recent political changes have seen an emphasis on controls on spending, which in turn is placing pressure on public services to manage within challenging budgets.

Local Authority funding, including national parks, continues to be stretched with increasing cost pressures due to the cost of living crisis, including higher energy costs, increasing pay demands and increases in supplies and services.

Local Context – the Authority’s financial performance:

At the end of 2021-22, the Authority reported a surplus of £6k. This was a slight improvement on the predicted breakeven position.

In February 2022, the Authority again approved a balanced budget. A revised budget was presented to the Authority meeting on 1 November 2022, slightly revising planned expenditure and planned income by £22.4k on each side to continue achieving a balanced position. The outturn position reported on 4 July 2023 was another slight surplus of £15.7k, which was transferred to general fund reserves.

The Authority’s reserves position continues to be relatively healthy, in the challenging national context, with the Authority reporting total reserves of £3.2m in its outturn report for 2022/23. However, the s151 officer identified a number of favourable one-off factors involved in achieving this position, such as a significant legacy. The Authority’s Medium Term Financial Strategy (MTFS) presented on 7 March 2023 identified that the savings gap is due to reach £376k by 2027-28. This position is supported by both optimistic and pessimistic scenarios which might either improve or worsen this position, respectively.

Audit reporting delays – context

In a report published in January 2023, the NAO highlighted that since 2017-18 there has been a significant decline in the number of local government body accounts including audit opinions published by the required deadlines set by the government. The NAO outlined a number of reasons for this and proposed actions.

In March 2023, Grant Thornton published ‘About time?’, which explored the reasons for the delay in publication of audited local authority accounts. The report explores several of the causes of delay and the steps which might be taken to reduce the incidence of delays. These steps relate to systems leadership, holding both authorities and auditors to account for their performance, a continued focus on the quality of accounts preparation and audit, and the effective engagement between auditors and audited bodies. The Grant Thornton report made a number of recommendations for improving timeliness in publishing audited accounts. Copies of the Grant Thornton report have been circulated to members of the Authority.

Key matters



Our Responses on key Authority matters

- As a firm, we are absolutely committed to high standards and continually improving audit quality and financial reporting in the local authority sector. Our proposed work and fee, as set out further in this Audit Plan, has been agreed with the Chief Finance Officer.
- We will continue to review the Authority's financial position through our regular discussions with the Chief Finance Officer, including budget monitoring, any changes to the MTFs, maintenance of general reserves, DEFRA funding and your key expenditure areas, such as staff costs.
- We will continue to consider your arrangements for managing and reporting your financial resources as part of our 2022-23 audit of your financial statements and value for money work (VFM).
- Our VFM work will also consider your arrangements relating to governance and improving economy, efficiency and effectiveness.
- We will follow up progress in implementing the actions agreed in respect of matters identified in prior year audit work relating to the financial statements audit as well as recommendations made as part of our review of your value for money arrangements
- We will continue to provide the Authority with sector updates providing our insight on issues from a range of sources and other sector commentators.
- We hold annual financial reporting workshops for our audited bodies to access the latest technical guidance and interpretations, discuss topical issues with our technical specialists and create networking links with other audited bodies to support consistent and accurate financial reporting across the sector.
- We have identified an increased incentive and opportunity for organisations in the public sector to manipulate their financial statements due to increasing financial pressures. We continue to identify a significant risk in regards to the management override of controls (see page 8) which is our key response to this risk.

2. Introduction and headlines

Purpose

This document provides an overview of the planned scope and timing of the statutory audit of the Exmoor National Park Authority for those charged with governance.

Respective responsibilities

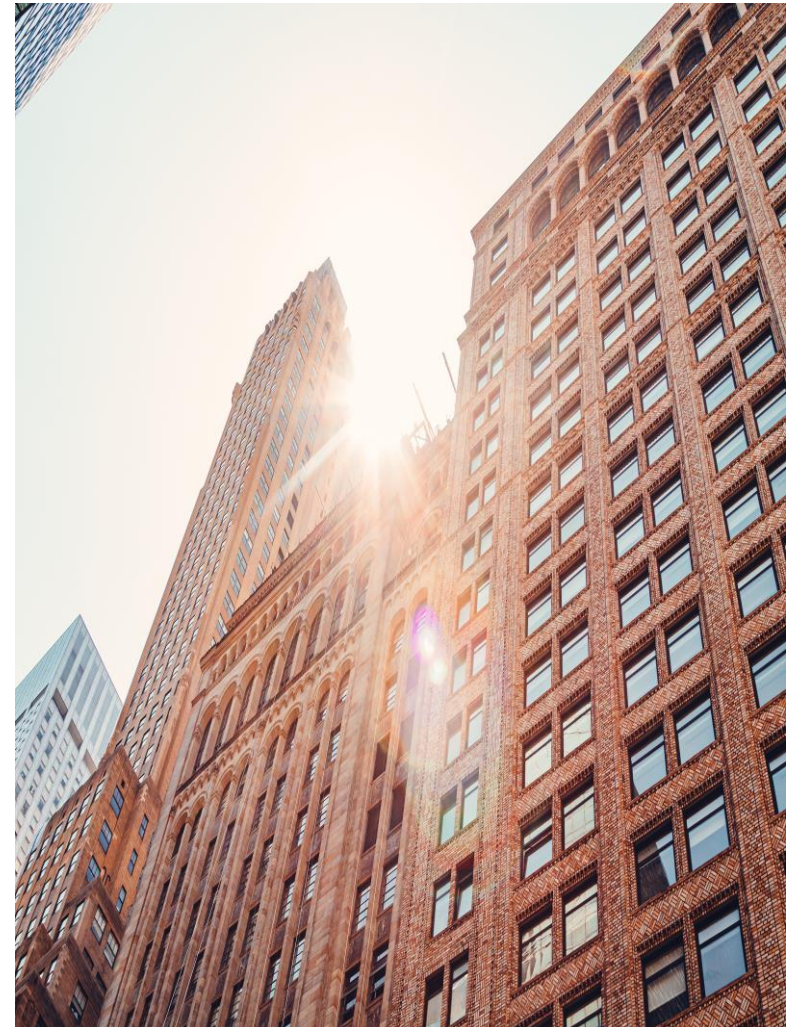
The National Audit Office ('the NAO') has issued a document entitled Code of Audit Practice ('the Code'). This summarises where the responsibilities of auditors begin and end and what is expected from the audited body. Our respective responsibilities are also set out in the Terms of Appointment and Statement of Responsibilities issued by Public Sector Audit Appointments Limited (PSAA), the body responsible for appointing us as auditor of the Authority. We draw your attention to both of these documents.

Scope of our audit

The scope of our audit is set in accordance with the Code and International Standards on Auditing (ISAs) (UK). We are responsible for forming and expressing an opinion on the Authority's financial statements that have been prepared by management with the oversight of those charged with governance (the Authority); and we consider whether there are sufficient arrangements in place at the Authority for securing economy, efficiency and effectiveness in your use of resources. Value for money relates to ensuring that resources are used efficiently in order to maximise the outcomes that can be achieved.

The audit of the financial statements does not relieve management or the Authority of your responsibilities. It is the responsibility of the Authority to ensure that proper arrangements are in place for the conduct of its business, and that public money is safeguarded and properly accounted for. We have considered how the Authority is fulfilling these responsibilities.

Our audit approach is based on a thorough understanding of the Authority's operations and is risk based.



Introduction and headlines

Significant risks

Those risks requiring special audit consideration and procedures to address the likelihood of a material financial statement error have been identified as:

- Management over-ride of controls
- Closing valuation of land and buildings
- Valuation of the net pension fund liability.

We will communicate significant findings on these areas as well as any other significant matters arising from the audit to you in our Audit Findings (ISA 260) Report.

Materiality

We have determined materiality to be £117k (PY £108k) for the Authority, which equates to 2% (PY: 2%) of your gross expenditure for the year ended 31 March 2023.

We are obliged to report uncorrected omissions or misstatements other than those which are 'clearly trivial' to those charged with governance. Clearly trivial has been set at £5,500 (PY £4,500) for the Authority.

New Auditing Standards

There are two auditing standards which have been updated this year which will increase our audit work. These are ISA (UK) 315 (Identifying and assessing the risks of material misstatement) and ISA(UK) 240 (the auditor's responsibilities relating to fraud in an audit of financial statements). We provide more detail on the work required later in this Plan.

Value for Money arrangements

Our risk assessment regarding your arrangements to secure value for money has not identified any risks of significant weakness at the planning stage.

We will continue to update our risk assessment until we issue our Auditor's Annual Report on your VFM arrangements.

Audit logistics

We completed our audit planning in August to September 2023. Our final audit will take place in January and February 2024

Our key deliverables are this Audit Plan, our Audit Findings (ISA260) Report, and our Auditor's Annual Report on our VFM work.

Our proposed fee for the audit will be £19,917 (PY: £18,454), subject to the Authority delivering a good set of financial statements and working papers.

We have complied with the Financial Reporting Council's Ethical Standard (revised 2019) and we as a firm, and each covered person, confirm that we are independent and are able to express an objective opinion on the financial statements.

3. Significant risks identified

Significant risks are defined by ISAs (UK) as risks that, in the judgement of the auditor, require special audit consideration. In identifying risks, audit teams consider the nature of the risk, the potential magnitude of misstatement, and its likelihood. Significant risks are those risks that have a higher risk of material misstatement.

Risk	Reason for risk identification	Key aspects of our proposed response to the risk
<p>Risk of fraud in revenue recognition and expenditure (Rebutted)</p>	<p>Revenue Under ISA (UK) 240 there is a rebuttable presumed risk that revenue may be misstated due to the improper recognition of revenue. This presumption can be rebutted if the auditor concludes that there is no risk of material misstatement due to fraud relating to revenue recognition.</p> <p>Having considered the risk factors set out in ISA240 and the nature of the revenue streams at the Authority, we have determined that the risk of fraud arising from revenue recognition can be rebutted, because:</p> <ul style="list-style-type: none"> • there is little incentive to manipulate revenue recognition • opportunities to manipulate revenue recognition are very limited • the culture and ethical frameworks of local authorities, including at the Authority, mean that all forms of fraud are seen as unacceptable. <p>Expenditure We have had regard to Practice Note 10 (Audit of financial statements and regularity of public sector bodies in the United Kingdom). Having considered the nature of the expenditure streams at the Authority, we have determined that the risk of fraud arising from expenditure recognition can be rebutted, because:</p> <ul style="list-style-type: none"> • there is little incentive to manipulate expenditure for an Authority where services are provided to the public through taxpayers' funds • the culture and ethical frameworks of local authorities, including at the Authority, mean that all forms of fraud are seen as unacceptable. 	<p>As we do not consider this to be a significant risk for the Authority, we will not be undertaking any specific work in this area other than our normal audit procedures which include:</p> <p>Accounting policies and systems</p> <ul style="list-style-type: none"> • evaluate the Authority's accounting policies for recognition of income and expenditure for its material income and expenditure streams and compliance with the CIPFA Code • update our understanding of the Authority's business processes associated with accounting for income and expenditure. <p>Grant income</p> <ul style="list-style-type: none"> • for grant income, we will sample test items for supporting evidence and check the appropriateness of the accounting treatment in line with the CIPFA Code. <p>Expenditure</p> <ul style="list-style-type: none"> • agree, on a sample basis, non-pay expenditure and year end payables to supporting evidence • undertake detailed substantive analytical procedures on pay expenditure. <p>We will also design and carry out appropriate audit procedures to ascertain that recognition of income and expenditure is in the correct accounting period, for example, using cut off testing, focusing either side of the balance sheet date of 31 March 2023.</p>

'Significant risks often relate to significant non-routine transactions and judgmental matters. Non-routine transactions are transactions that are unusual, due to either size or nature, and that therefore occur infrequently. Judgmental matters may include the development of accounting estimates for which there is significant measurement uncertainty.' (ISA (UK) 315)

Significant risks identified

Risk	Reason for risk identification	Key aspects of our proposed response to the risk
Management over-ride of controls	<p>Under ISA (UK) 240 there is a non-rebuttable presumed risk that the risk of management over-ride of controls is present in all entities. The Authority faces external scrutiny of its spending and this could potentially place management under undue pressure in terms of how they report performance.</p> <p>We have identified an increased incentive for organisations in the public sector to manipulate their financial statements due to increasing financial pressures.</p> <p>We therefore identified management override of control, in particular journals, management estimates and transactions outside the course of business as a significant risk, which was one of the most significant assessed risks of material misstatement.</p>	<p>We will:</p> <ul style="list-style-type: none">• evaluate the design effectiveness of management controls over journals• analyse the journals listing and determine the criteria for selecting high risk unusual journals• test unusual journals recorded during the year and after the draft accounts stage for appropriateness and corroboration• gain an understanding of the accounting estimates and critical judgements applied and made by management and consider their reasonableness with regard to corroborative evidence• evaluate the rationale for any changes in accounting policies, estimates or significant unusual transactions.

‘In respect of some risks, the auditor may judge that it is not possible or practicable to obtain sufficient appropriate audit evidence only from substantive procedures. Such risks may relate to the inaccurate or incomplete recording of routine and significant classes of transactions or account balances, the characteristics of which often permit highly automated processing with little or no manual intervention. In such cases, the entity’s controls over such risks are relevant to the audit and the auditor shall obtain an understanding of them.’ (ISA (UK) 315)

Significant risks identified

Risk	Reason for risk identification	Key aspects of our proposed response to the risk
Closing valuation of land and buildings	<p>The Authority re-values its land and buildings annually. This valuation represents a significant estimate by management in the financial statements due to the size of the numbers involved (£20m in the draft 2022-23 financial statements) and the sensitivity of this estimate to changes in key assumptions.</p> <p>We therefore identified the closing valuation of land and buildings, as a significant risk, which was one of the most significant assessed risks of material misstatement.</p>	<p>We will:</p> <ul style="list-style-type: none">• evaluate management's processes and assumptions for the calculation of the estimate, the instructions issued to valuation experts and the scope of their work• evaluate the competence, capabilities and objectivity of the valuation expert used by the Authority• discuss with the valuer the basis on which the valuation was carried out• challenge the information and assumptions used by the valuer to assess completeness and consistency with our understanding• test revaluations made during the year to see if they had been input correctly into the Authority's asset register• evaluate the assumptions made by management for those assets not revalued during the year (as applicable) and how management has satisfied themselves that these are not materially different to current value at year end

Management should expect engagement teams to challenge management in areas that are complex, significant or highly judgmental which may be the case for accounting estimates and similar areas. Management should also expect to provide to engagement teams with sufficient evidence to support their judgments and the approach they have adopted for key accounting policies referenced to accounting standards or changes thereto.

Where estimates are used in the preparation of the financial statements management should expect teams to challenge management's assumptions and request evidence to support those assumptions.

Significant risks identified

Risk	Reason for risk identification	Key aspects of our proposed response to the risk
Valuation of the pension fund net liability	<p>The Authority's pension fund net liability, as reflected in its balance sheet as the net defined benefit liability, represents a significant estimate in the financial statements.</p> <p>The pension fund net liability for 2022-23 is considered a significant estimate due to the size of the numbers involved (£1.9m in the Authority's balance sheet) and the sensitivity of the estimate to changes in key assumptions.</p> <p>We therefore identified valuation of the Authority's pension fund net balance as a significant risk, which is one of the most significant assessed risks of material misstatement.</p> <p>2022-23 is the first year in which the liability is based on the updated triennial valuation undertaken by the pension fund actuary based on data as at 31 March 2022. There has therefore been a significant reduction in the liability, which was £12.2m in the prior year.</p>	<p>We will:</p> <ul style="list-style-type: none">• update our understanding of the processes and controls put in place by management to ensure that the Authority's pension fund net balance is not materially misstated and evaluate the design of the associated controls• evaluate the instructions issued by management to their management expert (an actuary) for this estimate and the scope of the actuary's work• assess the competence, capabilities and objectivity of the actuary who carried out the Authority's pension fund valuation• assess the accuracy and completeness of the information provided by the Authority's to the actuary to estimate the liability• test the consistency of the pension fund asset and liability and disclosures in the notes to the core financial statements with the actuarial report from the actuary• undertake procedures to confirm the reasonableness of the actuarial assumptions made by reviewing the report of the consulting actuary (as auditor's expert) and performing any additional procedures suggested within the report• evaluate the triennial pension fund valuation outcomes and assess the reasonableness and prudence in that overall valuation through our audit approach• obtain assurances from the auditor of the Somerset Pension Fund as to the controls surrounding the validity and accuracy of membership data; contributions data and benefits data sent to the actuary by the pension fund and the fund assets valuation in the pension fund financial statements.

4. Other matters

Other work

In addition to our responsibilities under the Code of Practice, we have a number of other audit responsibilities, as follows:

- We read your Narrative Report and Annual Governance Statement and any other information published alongside your financial statements to check that they are consistent with the financial statements on which we give an opinion and our knowledge of the Authority.
- We carry out work to satisfy ourselves that disclosures made in your Annual Governance Statement are in line with requirements set by CIPFA.
- We carry out work on your consolidation schedules (as applicable) for the Whole of Government Accounts process in accordance with NAO group audit instructions.
- We consider our other duties under legislation and the Code, as and when required, including:
 - giving electors within the Authority’s boundary the opportunity to raise questions about your 2022-23 financial statements, consider and decide upon any objections received in relation to the 2022-23 financial statements
 - issuing a report in the public interest or written recommendations to the Authority under section 24 of the Local Audit and Accountability Act 2014 (the Act)
 - application to the court for a declaration that an item of account is contrary to law under section 28 or a judicial review under section 31 of the Act
 - issuing an advisory notice under section 29 of the Act
- We certify completion of our audit.

Other material balances and transactions

Under International Standards on Auditing, 'irrespective of the assessed risks of material misstatement, the auditor shall design and perform substantive procedures for each material class of transactions, account balance and disclosure'.

All other material balances and transaction streams will therefore be audited. However, the procedures will not be as extensive as the procedures adopted for the significant risks identified in this report.

5. Progress against prior year audit recommendations

We identified four issues in our 2021-22 audit of the Authority's financial statements as set out below, together with management's response. We will follow up on the implementation of these recommendations as part of our audit fieldwork.

Issue and risk identified in 2021-22 ISA260 Report (December 2022)

Driver Farm component accounting requirement:

Driver Farm is held in the asset register at £2m value as a land asset, and therefore not depreciated. Given the nature of the asset, it is likely that there is a material element which should be classified as a building, and as such, should be componentized, allocated a useful economic life, and depreciated.

The likely amount of any depreciation is estimated by management to be approximately £10k-£15k, which is immaterial but above our audit triviality.

'De minimis' items included on the Fixed Asset Register (FAR):

Our review of the FAR and asset valuations in year, identified a number of assets which are included in the FAR but not accounted for on the basis that their value is below £5,000 and therefore falls below the Authority's de minimis value for recognition of capital expenditure.

These assets nevertheless are being treated as capital assets, and therefore should be recognised at their carrying value even if this falls below £5,000, and depreciated where this is appropriate. The total nominal value of the assets as valued at 31 March 2022 is £14k, which is immaterial.

Identification of Heritage Assets:

Two assets identified as per the issue above, would be more appropriately classified as heritage assets under the CIPFA Code of Practice. As detailed at Appendix C, management has agreed to reclassify these and update the heritage assets note in year to make disclosure of these assets in line with the Code. The assets are currently held at nil value, as their total value on their current valuation basis is £4k. However, this valuation is based on a commercially focused Existing Use Value basis. We believe that due to their nature as heritage assets, an insurance valuation would be a more appropriate basis for determining their value.

Completeness of expenditure

In the 2020-21 year we identified an invoice for £3,400 which had related to 2020-21 but had not been accrued for and raised a recommendation in relation to this point. In 2021-22 we again identified two invoices totalling £5,977 which have not been accrued for. As in 2020-21, this is not material. We tested a further sample with no issues arising.

Recommendations and management's initial responses, updated for May 2023:

Management should split the Driver Farm asset on a component basis between land and buildings. The buildings element should then be allocated a useful economic life and depreciated accordingly.

Management response (December 2022):

Agreed with recommendation which will be actioned for the 2022-23 financial statements.

Management should ensure that all items being treated as capital are recognised at their carrying value. Assets falling below the de minimis threshold and expensed in year should be truly "one-off" and not be maintained in the asset register or held for indefinite future use.

Management response (December 2022):

Agreed with recommendation which will be actioned for the 2022-23 financial statements.

Management should review the valuation basis of heritage assets and consider using an alternative method of valuation (for example an insurance valuation) which may be more reflective of their true value to the Authority. The Authority should bear in mind that the Code of Practice is not prescriptive and allows for "any appropriate valuation method" to be used in the case of heritage asset valuations.

Management response (December 2022):

Agreed with recommendation which will be actioned for the 2022-23 financial statements.

The Authority should review its procedures to ensure all items that should be accrued for are identified and accounted for in the correct financial year.

Management response (December 2022):

Agreed. We will continue to work towards ensuring all invoices are allocated to the appropriate year, and we note that this only related to 2 items identified.

6. Our approach to materiality

The concept of materiality is fundamental to the preparation of the financial statements and the audit process and applies not only to the monetary misstatements but also to disclosure requirements and adherence to acceptable accounting practice and applicable law.

Matter	Description	Planned audit procedures
1	<p>Determination</p> <p>We have determined financial statement materiality based on a proportion of the gross expenditure cost of services of the Authority for the financial year.</p> <p>We have determined materiality to be £117k (PY £108k) for the Authority, which equates to 2% of your expenditure cost of services for the year ended 31 March 2023.</p>	<p>We determine planning materiality in order to:</p> <ul style="list-style-type: none">– establish what level of misstatement could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements– assist in establishing the scope of our audit engagement and audit tests– determine sample sizes and– assist in evaluating the effect of known and likely misstatements in the financial statements.
2	<p>Reassessment of materiality</p> <p>Our assessment of materiality is kept under review throughout the audit process.</p>	<p>We reconsider planning materiality if, during the course of our audit engagement, we become aware of facts and circumstances that would have caused us to make a different determination of planning materiality. We will review our materiality calculation upon receipt of your 2022-23 draft accounts.</p>
3	<p>Other communications relating to materiality we will report to the Authority</p> <p>Whilst our audit procedures are designed to identify misstatements which are material to our opinion on the financial statements as a whole, we nevertheless report to the Authority any unadjusted misstatements of lesser amounts to the extent that these are identified by our audit work.</p> <p>Under ISA 260 (UK) ‘Communication with those charged with governance’, we are obliged to report uncorrected omissions or misstatements other than those which are ‘clearly trivial’ to those charged with governance. ISA 260 (UK) defines ‘clearly trivial’ as matters that are clearly inconsequential, whether taken individually or in aggregate and whether judged by any quantitative or qualitative criteria.</p>	<p>We report to the Authority any unadjusted misstatements of lesser amounts to the extent that these are identified by our audit work.</p> <p>In the context of the Authority, we propose that an individual difference could normally be considered to be clearly trivial if it is less than £5,500 (PY £4,500) for the Authority.</p> <p>If management have corrected material misstatements identified during the course of the audit, we will consider whether those corrections should be communicated to the Authority to assist it in fulfilling its governance responsibilities.</p>

Our approach to materiality

The concept of materiality is fundamental to the preparation of the financial statements and the audit process and applies not only to the monetary misstatements but also to disclosure requirements and adherence to acceptable accounting practice and applicable law.

Materiality area	Amount (£)	Qualitative factors considered
Materiality for the financial statements	1117,000	We have determined materiality at 2% of gross operating expenditure based on the prior year. We consider this as the most appropriate criteria given stakeholders interest in the Authority delivering its budget.
Performance materiality	87,500	Assessed to be 75% of financial statement materiality.
Trivial matters	5,500	This equates to 5% of materiality. This is our reporting threshold to the FRAS Committee for any errors identified.



7. IT audit strategy

In accordance with ISA (UK) 315 Revised, we are required to obtain an understanding of the relevant IT and technical infrastructure and details of the processes that operate within the IT environment. We are also required to consider the information captured to identify any audit relevant risks and design appropriate audit procedures in response. As part of this we obtain an understanding of the controls operating over relevant Information Technology (IT) systems i.e., IT general controls (ITGCs). Our audit will include completing an assessment of the design and implementation of relevant ITGCs.

The following IT system has been judged to be in scope at audit planning stage. Based on the financial statement audit approach we will perform the level of assessment required. We will keep this under review as the audit progresses and will update our understanding if there are additional IT systems within the scope of the audit. We will report that to you including our assessments (as applicable) in our ISA(UK) 260 report.

IT system	Audit area	Estimated value	Planned level IT audit assessment
SAP	Financial reporting	£5.9m	Detailed ITGC assessment (design and implementation)

8. Value for Money arrangements

Approach to Value for Money work for the period ended 31 March 2023

The National Audit Office issued its latest Value for Money guidance to auditors in January 2023. The Code expects auditors to consider whether a body has put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources. Auditors are expected to report any significant weaknesses in the body's arrangements, should they come to their attention. In undertaking their work, auditors are expected to have regard to three specified reporting criteria. These are as set out below:



Improving economy, efficiency and effectiveness

How the body uses information about its costs and performance to improve the way it manages and delivers its services.



Financial Sustainability

How the body plans and manages its resources to ensure it can continue to deliver its services.



Governance

How the body ensures that it makes informed decisions and properly manages its risks.

We have not identified any risks of significant weaknesses from our initial planning work. We will continue our review of your arrangements, including reviewing your Annual Governance Statement, before we issue our Auditor's Annual Report.

9. Audit logistics and team



Barrie Morris, Key Audit Partner & Engagement Lead

Barrie leads our relationship with you and takes overall responsibility for the delivery of a high quality audit, ensuring the highest professional standards are maintained and a commitment to add value to the Authority.

Liam Royle, Engagement Manager

Liam plans, manages and leads the delivery of the audit, is your key point of contact for your finance team and is your first point of contact for discussing any key issues.

Audited Entity responsibilities

Where audited bodies do not deliver to the timetable agreed, we need to ensure that this does not impact on audit quality or absorb a disproportionate amount of time, thereby disadvantaging other audited bodies. Where the elapsed time to complete an audit exceeds that agreed due to an entity not meeting its obligations we will not be able to maintain a team on site. Similarly, where additional resources are needed to complete the audit due to an entity not meeting their obligations we are not able to guarantee the delivery of the audit to the agreed timescales. In addition, delayed audits will incur additional audit fees.

Our requirements

To minimise the risk of a delayed audit, you need to :

- ensure that you produce draft financial statements of good quality by the deadline you have agreed with us, including all notes and the Annual Governance Statement
- ensure that good quality working papers are available at the start of the audit, in accordance with the working paper requirements schedule that we have shared with you
- ensure that the agreed data reports are available to us at the start of the audit and are reconciled to the values in the accounts, in order to facilitate our selection of samples for testing
- ensure that all appropriate staff are available throughout (or as otherwise agreed) the planned period of the audit
- respond promptly and adequately to audit queries.

10. Audit fees and updated Auditing Standards including ISA 315 Revised

In 2017, PSAA awarded a contract of audit for the Authority to begin with effect from 2018-19. Since that time, there have been a number of developments, particularly in relation to the revised Code and ISA's which are relevant for the 2022-23 audit. For details of the changes which impacted on years up to 2021-22 please see our prior year Audit Plans.

The major change impacting on our audit for 2022-23 is the introduction of ISA (UK) 315 (Revised) - Identifying and assessing the risks of material misstatement ('ISA 315'). There are a number of significant changes that will impact the nature and extent of our risk assessment procedures and the work we perform to respond to these identified risks. Key changes include:

- Enhanced requirements around understanding the Authority's IT Infrastructure and IT environment. From this we will then identify any risks arising from the use of IT. We are then required to identify the IT General Controls ('ITGCs') that address those risks and test the design and implementation of ITGCs that address the risks arising from the use of IT.
- Additional documentation of our understanding of the Authority's business processes, which may result in us needing to perform additional inquiries to understand the Authority's end-to-end processes over more classes of transactions, balances and disclosures.
- We are required to identify controls within a business process and identify which of those controls are controls relevant to the audit. These include, but are not limited to, controls over significant risks and journal entries. We will need to identify the risks arising from the use of IT and the general IT controls (ITGCs) as part of obtaining an understanding of relevant controls.
- Where we do not test the operating effectiveness of controls, the assessment of risk will be the inherent risk, this means that our sample sizes may be larger than in previous years.

These are significant changes which will require us to increase the scope, nature and extent of our audit documentation, particularly in respect of your business processes, and your IT controls. We will be unable to determine the full fee impact until we have undertaken further work in respect of the above areas. However, for an authority of your size, we estimate an initial increase of £1,000. We will let you know if our work in respect of business processes and IT controls identifies any issues requiring further audit testing.

The other major change to Auditing Standards in 2022-23 is in respect of ISA 240 which deals with the auditor's responsibilities relating to fraud in an audit of financial statements. This Standard gives more prominence to the risk of fraud in the audit planning process. We will let you know during the course of the audit should we be required to undertake any additional work in this area which may impact on your fee.

Taking into account the above, our proposed work and fee for 2022-23, is detailed on page 22 and has been agreed with the Chief Finance Officer.

Audit fees

	Actual Fee 2020/21	Actual Fee 2021/22	Proposed fee 2022/23
Exmoor National Park Authority audit	£16,004	£18,454	£19,917

Assumptions

In setting the above fees, we have assumed that the Authority will:

- prepare a good quality set of accounts, supported by comprehensive and well-presented working papers which are ready at the start of the audit
- provide appropriate analysis, support and evidence to support all critical judgements and significant judgements made during the course of preparing the financial statements
- provide early notice of proposed complex or unusual transactions which could have a material impact on the financial statements.

Relevant professional standards

In preparing our fee estimate, we have had regard to all relevant professional standards, including paragraphs 4.1 and 4.2 of the FRC's [Ethical Standard \[revised 2019\]](#) which stipulate that the Engagement Lead (Key Audit Partner) must set a fee sufficient to enable the resourcing of the audit with partners and staff with appropriate time and skill to deliver an audit to the required professional and Ethical standards.

Audit fees

Detailed analysis

Audit fees	Estimated fee
Scale fee per PSAA for 2022-23	13,692
Reduced materiality	250
PPE Valuation	1,500
Additional Requirements – Payroll Change of Circumstances (Information Provided by the Entity) IPE Testing	500
Value for Money audit – new NAO requirements	1,750
ISA 540	475
ISA 315	1,000
Additional journals testing	750
Estimated fee	19,917

11. Independence and non-audit services

Auditor independence

Ethical Standards and ISA (UK) 260 require us to give you timely disclosure of all significant facts and matters that may bear upon the integrity, objectivity and independence of the firm or covered persons. relating to our independence. We encourage you to contact us to discuss these or any other independence issues with us. We will also discuss with you if we make additional significant judgements surrounding independence matters.

We confirm that there are no significant facts or matters that impact on our independence as auditors that we are required or wish to draw to your attention. We have complied with the Financial Reporting Council's Ethical Standard and we as a firm, and each covered person, confirm that we are independent and are able to express an objective opinion on the financial statements. Further, we have complied with the requirements of the National Audit Office's Auditor Guidance Note 01 issued in May 2020 which sets out supplementary guidance on ethical requirements for auditors of local public bodies.

We confirm that we have implemented policies and procedures to meet the requirements of the Ethical Standard. For the purposes of our audit we have made enquiries of all Grant Thornton UK LLP teams providing services to the Authority.

Other services

No other services provided by Grant Thornton were identified.

Any changes and full details of all fees charged for audit related and non-audit related services by Grant Thornton UK LLP and by Grant Thornton International Limited network member Firms will be included in our Audit Findings report at the conclusion of the audit.

12. Communication of audit matters with those charged with governance

Our communication plan	Audit Plan	Audit Findings
Respective responsibilities of auditor and management/those charged with governance	•	
Overview of the planned scope and timing of the audit, form, timing and expected general content of communications including significant risks and Key Audit Matters	•	
Confirmation of independence and objectivity of the firm, the engagement team members and all other indirectly covered persons	•	•
A statement that we have complied with relevant ethical requirements regarding independence. Relationships and other matters which might be thought to bear on independence. Details of non-audit work performed by Grant Thornton UK LLP and network firms, together with fees charged. Details of safeguards applied to threats to independence	•	•
Significant matters in relation to going concern	•	•
Significant findings from the audit		•
Significant matters and issue arising during the audit and written representations that have been sought		•
Significant difficulties encountered during the audit		•
Significant deficiencies in internal control identified during the audit		•
Significant matters arising in connection with related parties		•
Identification or suspicion of fraud (deliberate manipulation) involving management and/or which results in material misstatement of the financial statements		•
Non-compliance with laws and regulations		•
Unadjusted misstatements and material disclosure omissions		•
Expected modifications to the auditor's report, or emphasis of matter		•

ISA (UK) 260, as well as other ISAs (UK), prescribe matters which we are required to communicate with those charged with governance, and which we set out in the table here.

This document, the Audit Plan, outlines our audit strategy and plan to deliver the audit, while the Audit Findings will be issued prior to approval of the financial statements and will present key issues, findings and other matters arising from the audit, together with an explanation as to how these have been resolved.

We will communicate any adverse or unexpected findings affecting the audit on a timely basis, either informally or via an audit progress memorandum.

Respective responsibilities

As auditor we are responsible for performing the audit in accordance with ISAs (UK), which is directed towards forming and expressing an opinion on the financial statements that have been prepared by management with the oversight of those charged with governance.

The audit of the financial statements does not relieve management or those charged with governance of their responsibilities.



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9.1



Committee Report

Application Number:	6/29/23/006
Registration Date:	23-May-2023
Target Determination Date:	12-Jul-2023
Extension of Time:	
Applicant	Mr I Carew
Agent:	
Case Officer:	Andrew Spiers
Site Address:	Hurlstone Bungalow, ALLERFORD, MINEHEAD, TA24 8HJ
Proposal:	Proposed demolition of existing bungalow and sheds. Erection of replacement eco-bungalow and new shed. (resubmission of application 6/29/21/121)
Recommendation:	Approve with Conditions
Reason for bringing before Authority Committee:	This application is brought before the Committee in accordance with the approved Scheme of Delegation as the application attracted a great deal of public interest. The Head of Planning & Sustainable Development is of the opinion that the application should be determined by the Planning Authority.

Relevant History

6/29/21/121 Proposed demolition of existing bungalow and erection of replacement bungalow, Withdrawn 11/04/2023

Site Description & Proposal

The site is situated adjacent to the South West Coastal Path, approximately 600 metres north of the village of Bossington. The coastal path is the only access to the site, and a ford between the National Trust car park in Bossington and the coastal path must be crossed in order to reach the site. The pathway steeply rises from the ford and follows the contours of the coastline, which dips downwards to lower ground and the sea to the west and upwards to wooded ground to the east.

The site itself is a fairly narrow but long strip of land immediately adjacent to the South West Coastal Path. There is at present a small dwelling on the site. It is of light construction, dating from 1924, and now in a relatively poor state of repair; it appears to have last been occupied in 2016.

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The site is situated within the Heritage Coastal Area; the Historic Settlement Core of Bossington; a Seascape Character Area; and although the proposed dwelling would be within Flood Zone 1 (least likely to flood), the access via the South West Coastal Path at the area of the ford (some 500 metres away) would be within Flood Zone 3.

The proposal is for a replacement dwelling on roughly the same part of the site as that existing, and it is intended to be occupied by the applicant and his family, who currently live in Porlock Weir.

The replacement dwelling is proposed to remain a bungalow. It would be made up of four stepped elements in order to break up the overall mass of the building. This stepping is designed to echo historic countryside buildings which have evolved over time by building outwards. Due to the narrow and constrained site, the building is necessarily linear in design

The proposal also includes a separate outbuilding to be used as a boiler room containing a biomass boiler. Solar panels are also shown to be affixed to the new roof slopes.

The existing access and parking area to serve the property are shown as being retained for use, and a full landscaping plan accompanies the application.

Consultee Representations

ENPA Wildlife Conservation Officer – 06/07/2023 - Thank you for consulting me on this application which is a resubmission of a previous application. It is clear that work has been done to address concerns I had relating to the previous application. The specific outstanding concerns I had were:

- Potential impacts of construction-related traffic crossing the ford
- Potential impacts of construction-related traffic resulting in erosion/collapse of the river bank
- Ensuring no net-loss of biodiversity on site and seeking net gain in line with local and national policies
- Ensuring appropriate management of invasive non-native species on site (specifically three-cornered leek)
- Clarification of the proposed use of the area to the north of the property

These have largely been addressed and further information provided upfront including the Ecological Mitigation and Enhancement Strategy and a Landscape and Ecological Management Plan. Unfortunately, I do however have concerns about bat surveys for the sheds as detailed below.

Documents submitted in support of the application with particular relevance to ecology include:

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- Update Ecological Walkover, Seasons Ecology, April 2023 (letter dated 3 May 2023)
 - CEMP, EMES and LEMP, Seasons Ecology (Issue 1, 10 May 2023) + updated figure (030723)
 - Seasons Ecology (Issue 1, 10 May 2023) + updated figure (030723)
 - Vehicle Management Plan (Milestone, *undated*)
 - Bat Survey Report, Smart Ecology, July 2022 (Issue 2, October 2022)
 - Badger Survey Report, Smart Ecology, July 2022 (Issue 1, July 2022)
 - Preliminary Ecological Appraisal, Seasons Ecology, February 2022 (Issue 3, March 2022)

The methods, presentation of results and recommendations within the ecological reports are satisfactory.

The site has been identified as comprising a bungalow and shed within a landholding which comprises semi-improved grassland, scrub, trees, introduced shrubs and hedgerows with fencing and retaining walls. The bungalow was identified as having high suitability for roosting bats and has been found to support a summer day roost for low numbers of common pipistrelle bats (maximum count of one bat) and a summer day roost for low numbers of lesser horseshoe bats (identified by DNA analysis of droppings). The shed and other outbuildings provided night roosting opportunities but no evidence of this has been recorded in the shed. The outbuildings were not surveyed as it was understood they would not be impacted at the time of the further surveys*. At least six species of bat were recorded during the bat surveys, including rarer and more light sensitive species such as greater and lesser horseshoe. In addition, the site provides opportunities for other protected/notable species including bluebell, badger (dung recorded on site), dormice, other mammals such as hedgehog, nesting birds (confirmed in the shed) and reptiles. No badger setts were recorded on or within 30m of the site and no signs of badger activity were recorded during a further survey in July 2022 (following identification of badger dung in January 2022 which indicates that badger are active in the area). Three-cornered leek, an invasive non-native species listed on Schedule 9 of the Wildlife and Countryside Act has been recorded on site.

I note the application now includes the demolition of the two sheds to the north of the property. These were assessed within the original PEA (Seasons Ecology, February 2022) and identified as having opportunities as a feeding/night roost. An internal inspection was recommended during the active season to confirm use as a feeding/night roost. However, this was not undertaken during 2022 as the proposals were not affecting these buildings at that time. A survey to confirm use as a feeding/night roost therefore needs completing prior to determination. This is my reason for objection at this stage.

Appropriate recommendations have been included in the survey reports including: an EPSL will be required prior to works commencing that would otherwise cause an offence with bat mitigation including a compensatory bat roost in the roof of the boiler

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shed, the exact details of which will need to be agreed by Natural England post-planning but which seems appropriate to me; construction environmental management plan; precautionary methods of work with respect to dormice; a pre-commencement survey and careful working methods with respect to badger; consideration to the nesting bird season; precautionary methods of work with respect to reptiles; safe removal and disposal of three-cornered leek to prevent spread of INNS.

As recommended the CEMP, EMES and LEMP includes recommendations for protective measures to be undertaken prior to and during construction. It also demonstrates landscaping proposals for the site which show hedgerow, tree and shrub planting and areas of grassland which will be managed as a meadow for wildlife. Prescriptions for management are aimed at wildlife and are acceptable. The vehicle management plan details consideration of potential impacts of construction-related traffic on the ford (and sensitive habitats downstream) and the riverbank. Mitigation proposed appears to be appropriate and must be adhered to. If any concerns are raised about the condition of the river or banks then work will have to stop until a solution is found.

Recommendations:

- The site lies directly adjacent to Exmoor Coastal Heaths SSSI and around 60m from the boundary of Exmoor Heaths SAC. Consultation with Natural England is required for all planning applications (except householder) in this Impact Risk Zone (IRZ), please do so, if not already completed.
- To ensure the 'strict protection' of European protected species I suggest we require a copy of the European protected species licence to be submitted to the Local Planning Authority prior to commencement.
- The recommendations within the CEMP, EMES and LEMP should be secured by way of appropriate condition, with evidence of the work completed by the Ecological Clerk of Works including a Toolbox Talk and supervision of work being submitted to the LPA to discharge the condition. This should also include evidence of the toolbox talk being given to all new members of the site team as part of their induction by the Biodiversity Champion. Let me know if you want to discuss the wording for this.
- A pre-works survey for badger should be conditioned.
- Evidence of nesting birds was found and therefore precautionary measures have been recommended. I recommend a suitable condition is attached to any planning permission granted to ensure no vegetation removal or demolition works take place between 1st March and 31st August inclusive, unless a competent ecologist has undertaken a careful, detailed check for active birds' nests immediately before the work and provides written confirmation that no birds will be harmed and/or that there are appropriate measures in place to protect nesting bird interest on site. Any such written confirmation should be submitted to the Local Planning Authority by the ecologist.
- No external lighting is proposed, and I suggest this is also secured by way of appropriate condition.
- The recommendations within the vehicle management plan should be secured by

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way of appropriate condition.

ENPA Wildlife Conservation Officer 09/08/2023 - Further to my previous comments, dated 6 July 2023, in which I objected due to the lack of survey information for the sheds which will be demolished, we have now received an updated bat survey report:

- Smart Ecology, Bat Survey Report, ref 2022-069, dated 26 July 2023.

The report has been updated to include the results of an emergence survey of the bungalow and internal inspections of the sheds in July 2023. The methods presentation of results and recommendations within the report are satisfactory.

The sheds were identified as providing suitable night or feeding roost opportunities within the Preliminary Ecological Appraisal (Seasons Ecology, SET_485.01, 16 March 2022). An internal inspection during the active season was recommended if any impacts on the buildings were anticipated. Therefore, given they are now proposed for demolition, Smart Ecology undertook an inspection both before and after the emergence survey on 18 July 2023 to look for bats or evidence of bats, particularly droppings/or feeding remains. No bats or evidence of bats were identified within the sheds. It was therefore concluded that they are not used as night or feeding roosts. I have also discussed this with the ecologist who undertook the survey to ascertain how easy it was to check the buildings for evidence, and he is confident that signs would have been visible and the buildings are not being used by bats. I can therefore remove my objection.

Please refer back to my previous comments for recommendations, which remain relevant.

Selworthy & Minehead Without Parish Council - Following on from the Parish Council meeting held on Monday 19th June, Selworthy and Minehead without Parish Council feel unable to reach any kind of decision other than pass this back to the ENPA for your consideration. This planning application is, as you will appreciate complex and highly contentious within our community. We would urge you to carefully consider all of the correspondence you have received in favour and against this application, along with those of organisations such as the CPRE and take these into consideration when forming your decision.

Planning Liaison Officer, Environment Agency South West – 4th August 2023 - Thank you for your consultation in respect of this planning application. I reiterate our previous response:

Flooding Advice

The building is in flood zone 1 so not at risk of flooding. However, the access and egress are in flood zone 3. Please find attached our standard planning advice note on access and egress which will help you determine whether the proposal is appropriate.

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Main River Advice

It does not look like the development will take place near the main river but I have attached the Main River Advice should this not be the case. If there is to be any development or land raising within 8 meters of the main river, please reconsult us for further comment.

Paragraph 7-038-20140306 of the Planning Practice Guidance and paragraph 167 of the NPPF are clear that access and egress needs to be part of the consideration of whether new development will be safe. Paragraph Reference ID: 7-039-20140306 provides further guidance.

We advise that a flood plan is prepared which outlines how occupants will respond in a flood event. We have worked with the Association of Directors of Environment, Economy, Planning and Transport (ADEPT) to produce some joint guidance on flood risk emergency plans for new development. The guidance is available online: www.adeptnet.org.uk/floodriskemergencyplan.

Our role is to provide advice to LPAs on the flood hazards at the site and to issue Flood Warnings during a flood event. In considering the safety of access and egress the LPA should also consult with their Council's emergency planners. Where no safe access and egress route exists the LPA will need to consider the hazards and advice from their emergency planners and take a view on whether a safe refuge above the design flood level is a suitable alternative.

It is for the local authority's emergency planning function to advise on whether the access/egress, evacuation or refuge arrangements during a flood event are safe and whether the additional occupants can be incorporated into their emergency evacuation plans.

23rd August 2023 - **Environment Agency** - No objection on flood risk grounds.

Thank you for reconsulting us and confirming that no works are proposed to the existing access route, the river or ford. The development remains in flood zone 1, as such we have no objections on flood risk grounds.

ENPA Future Landscapes Officer - The revised application has a number of amendments that address concerns raised in the previous application. However, I would like clarification on whether the parking next to the dwelling would involve the creation of hard standing, and if so, what is proposed?

The omission of the parking area adjacent to the track

This removes the need for substantial excavation of the bank and disposal of material onsite. It also takes parked vehicles out of the public realm and no longer in full sight from the PRow, retains more of the stone face bank alongside the property boundary

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and addresses safety concerns over visibility and vehicles needing to use the track for turning.

Concerns over the impact of construction traffic on the track (Hurlstone Lane)

Further documentation has been provided in the Vehicle Management Plan and Construction Method Statement. They indicate the level of caution, protective measures and mitigation to minimise risk of damage to the track and river bank and also safe passage for pedestrians and should be adhered to by all construction/delivery personnel.

Visual impact

Visibility of the site is primarily from the adjacent track and Bossington Beach. There are a number of other amendments have been incorporated that would reduce the visual impact of the development. This includes:

- The relocation of the steps to the end of the plot, enabling a continuous hedgerow boundary screen along the frontage of the building
- Thickening up and gap filling of the hedgerow along the frontage for increased screening
- Aligning the steps to minimise views in, towards the dwelling

Whilst a stepped roof and façade does break up the massing more than a single rectangular building would, I still have concerns over the massing and scale of the proposed dwelling and its appropriateness in this location.

ENPA Future Landscapes Officer 09/08/2023 - (The applicant) has sent me this plan which I must admit is easier to read so am sending it to you too. This answers my questions - the location and surfacing (of the parking area) are appropriate.

ENPA ROW and Access Officer – No response

ENPA Trees and Woodlands Officer – No Response

The Exmoor Society - The Exmoor Society, a charity promoting the protection of Exmoor National Park for the benefit of all, has the following concerns:

1. The site plan shows that the sheds are to be demolished and a new hedge planted. Demolition of the sheds requires ecological assessment, not included.
2. The traffic management statement mentions that Hurlstone Lane already has vehicular use. In practice, there is only occasional tractor use along the wide stretch as far as the large field adjacent to the Horner Water, and virtually no vehicle use along the narrow section between the junction of the field gate and existing bungalow. On rare occasions, National Trust Rangers use a Quad bike or Mule there for

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countryside management. Near the bungalow, the SW Coast Path/public bridleway is very narrow, so hazardous for pedestrians and vehicles sharing the same route.

3. The bridleway from Bossington is part of the SW Coast Path. Well-used by walkers, families with dogs, cyclists and horse riders, additional vehicular traffic will have a negative impact on people's amenity, enjoyment, and experience of tranquillity. The bridleway is already eroded and often the ford cannot be crossed in winter. Also, the right of way is very narrow in places and the SW Coast Path will be compromised.

4. The Landscape Viability Appraisal contradicts others' opinion that the sensitive coastal location within the Heritage Coast will have a negative impact on landscape character: specifically, in daylight, visibility from Bossington Beach, the two public footpaths around Bossington Hill and above the property; at night, extra light pollution in this remote part of Exmoor Dark Skies Reserve. The proposal to mitigate visibility of the intended bungalow and its associated structures by increasing frontal hedge height and thickness should be a requirement.

Natural England - No Objection - Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites.

CPRE – No response

South West Coast Path Association – No response

Exmoor Natural History Society - As Chair of Exmoor Natural History Society I would like to object to this application on behalf of the society. This development will cause damage and disturbance to the wildlife and habitats in this special tranquil area. We do not feel that the ecological issues have been thoroughly addressed.

Somerset Council – Lead Local Flood Authority - We believe that this is a minor application as there are less than 10 dwellings. As this is a minor application, and falls below the requirements for LLFA statutory consultation, the LLFA has no comments to make regarding this application. However, if there is anything specific that you require the LLFA to comment on, please let us know.

Devon and Somerset Fire Service – No response.

Representations

A petition signed by 58 households within the parishes on Minehead Without and Selworthy, & Porlock, has been received against the proposed development.

In addition, 13 objections have been received from individuals. The comments made within both the petition and the individual responses may be summarised as follows:

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- Proposal does not reflect scale of original dwelling
 - Destruction of wildlife and biodiversity
 - Represents over-development
 - Out of character with the area
 - Impact on Exmoor Dark Skies
 - Design issues – too much fenestration and solar panels
 - Parking area is not 'existing'
 - Traffic survey submitted exaggerates the volume of traffic using the access
 - Increase in traffic will threaten safety and amenity of walkers and riders
 - Inadequate foul sewage assessment
 - No support from local community
 - Status and height of screening hedge to the front should be protected by planning Condition
 - Proposed outbuilding is too large
 - Property likely to be used as a holiday let
 - Will adversely effect the historic setting of Bossington village
 - Stepping of the roof makes it look like four buildings
 - Difficulty of access for emergency service vehicles
 - Adverse impact on character and visual amenity of the area
 - Will spoil the view from the bridleway
 - The present building has been abandoned
 - Parked cars adjacent will spoil view
 - Concerns over drainage
 - Ecological concerns over the removal of existing sheds
 - Excessive scale and massing

Policy Context

Exmoor National Park Local Plan 2011 – 2031 (including Minerals and waste):

GP1 General Policy: Achieving National Park Purposes and Sustainable Development

CE-S1 Landscape and Seascape Character

CE-D1 Protecting Exmoor's Landscapes and Seascapes

CE-S2 Protecting Exmoor's Dark Night Sky

CE-S3 Biodiversity and Green Infrastructure

CE-S6 Design and Sustainable Construction Principles

CC-S1 Climate Change Mitigation and Adaptation

CC-D1 Flood Risk

CC-S2 Coastal Development

CC-S5 Low Carbon and Renewable Energy Development

HC-S1 Housing

HC-S4 Principal Residence Housing

HC-D17 Replacement Dwellings

RT-D12 Access Land and Rights of Way

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The National Planning Policy (NPPF) is also a material planning consideration.

Planning Considerations

The main considerations in this case are those of the Principle of Development; Design and Scale; Effect on Landscape; effect on ecology; flood risk; and traffic associated issues. For the sake of regularity, this report will consider each issue in turn.

Principle of Development

Policy HC-D17 (Replacement Dwellings) is of particular importance in this case. The policy, in its entirety, reads as follows:

1. Proposals for the erection of a replacement dwelling will be permitted where the existing dwelling:

- a) is not listed or considered to be of historic 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.*

2. The proposed replacement dwelling should:

- 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 93 square metres gross internal area, whichever is the larger;*
- c) reflect the massing and scale of the original dwelling; and*
- d) accord with the design and sustainable construction requirements of policy CE-S6.*

3. Where permission is granted, conditions will be attached to:

- a) remove permitted development rights granted by the Town and Country Planning (General Permitted Development) Order 2015 in respect of extensions on dwellings of less than 93 square metres to ensure they do not exceed this size; and*
- b) ensure that the existing dwelling is demolished and removed from the site prior to or within 3 months of the replacement dwelling first being occupied.*

The existing dwelling is of light construction, dating from approximately 1924, and is in quite a poor state of repair, and has not been resided in since 2016. Given the condition of the building and the lack of occupancy, before considering the policy implication of the scheme the Planning Authority should satisfy themselves that the dwelling has not been abandoned.

Abandonment is unique in planning law. There are seldom any other provisions within the UK Legal System that allow a person to abandon something however in terms of the Town and Country Planning Act 1990 there is provision to abandon a planning

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use or even previously developed land. As such, it is necessary to briefly consider elements of case law alluding to the matter.

In considering a case an inspector usefully set out the case law on abandonment. He recorded that 'abandonment', is a legal concept used by the courts to describe the circumstances in which rights to resume a use which has been lawfully carried on in the past may be lost because of the cessation of that use. It was established in *Panton and Farmer v SSETR & Vale of White Horse DC* [1999], however, that a use which was merely dormant or inactive could still be 'existing' so long as it had already become lawful and had not been extinguished. Nevertheless, in *Hartley v MHLG* [1970], Lord Denning found that if a building or land remains ".unused for a considerable time, in such circumstances that a reasonable man might conclude that the previous use had been abandoned, then the Tribunal may hold it to have been abandoned".

Furthermore, in the case of the *Trustees of Castell-y-Mynach Estate v Taff-Ely BC* [1985], the court established four criteria for assessing whether a use had been abandoned. These are:

- (1) the physical condition of the buildings;
- (2) the period of non-use;
- (3) whether there has been any other use; and
- (4) the owner's intentions.

In *Hughes v SSETR & South Holland DC* [2000] the Court of Appeal held, on the authority of *Hartley*, that the test of the owner's intentions should be objective and not subjective. In this regard the test was the view to be taken by "a reasonable man with knowledge of all the relevant circumstances".

Whilst the gender references above might now appear somewhat outdated, the principle expressed here is still valid.

As such, in this case:

- 1) Though the building is not in a good state of repair, it is fairly complete and represents a building which, though not comfortable, is still capable of providing shelter.
- 2) It appears that the building has been empty for less than ten years.
- 3) The building has not been used for any alternative purposes during that time.
- 4) There appears to be no intention on the part of the previous or the present owners to abandon the building.

Therefore, it is reasonable to conclude that the building and the use of the building and the surrounding land has not been abandoned.

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The proposed house, would be sited on and near to the footprint of the existing dwelling. It would not have an internal gross internal floorspace of more than 93 square metres. The present building has a footprint of 82.4 square metres.

With regard to scale and massing, it is noted that the proposed dwelling would be of a single storey only, with a fairly low roofline. As such, Officers would contend that the the proposal is in accordance with these requirements.

In line with the policy HC-D17, if approved, permitted development rights are removed from the proposed property. The existing dwelling would need to be removed from the site before any further development takes place, if approved.

Therefore, Officers would contend that the proposal is in accordance with policy HC-D17 and that the principle of development is therefore acceptable.

Design and Scale

Policy CE-S6 requires development proposals to deliver high quality sustainable designs that positively contribute to the setting; use materials and design elements that complement the local context; reinforces landscape character and the positive arrangement of landscape features; have regard to health and well-being; improve safety, inclusivity and accessibility for those who live, work and visit there; would not detrimentally affect the amenities of surrounding properties and occupiers including overlooking, loss of daylight, overbearing appearance; or have any other adverse environmental impacts.

The matter of design and scale is important in this case. In terms of scale, policy HC-D17 allows for a footprint of up to 93 square metres; the proposed dwelling would comply with this requirement.

Officers are of the opinion that the design proposed is acceptable, and would present a much more pleasing aspect than the existing dishevelled building. The design is an eclectic but effective mix of traditional and contemporary, presenting a contemporary styling whilst using traditional materials. It is also designed to sit well within the confines and constraints of this narrow site, and the stepping of the roofline further adds to a visually pleasing and unobtrusive level of design.

The design of the proposed property is therefore considered to be acceptable. An objector has noted that the stepping of the roof would make the property look like four buildings, but Officers disagree with this view. Were the property to have one continuous roofline, presumably at the highest level, this would produce a solid façade which would actually increase the visual massing of the proposed building. In stepping the roofline, this visual effect would be vastly reduced, thus producing a good design which Officers contend would be in accordance with Policy CE-S6 of the Exmoor National Park Local Plan. The use of traditional materials would further add to this design ethic.

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Similarly, the proposed outbuilding would be fairly small-scale and of a low-key, simple design.

Foul sewage would be dealt with by the existing septic tank, which has been examined and found to be in good order. The existing discharge pipe discharges directly to ground; the proposal is to upgrade the discharge pipe to include a distribution/ sampling chamber and a drainage field according to the latest building regulations.

As such, Officers would contend that the proposed design and scale are acceptable and in accordance with Local Plan policy.

Effect on Landscape

As noted earlier in this report, the site is set adjacent to the South West Coastal Path, which is a semi-paved trackway. Coming up from the ford, it winds its way higher through a wooded area. To the east is the coastline; the topography here climbs from the coastline, across the site in an easterly direction, and continues climbing. There is a line of trees on the western side of the track, and areas of light woodland to the east (behind the site). Due to the screening of the trees to the west, and the hedgerow to the front of the site, the existing property is semi-observed from view.

Policy CE-D1 of the Local Plan includes the following:

'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:

- 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.*

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.'

Whilst the Future Landscapes Officer has noted that the amendments made in this application, particularly the removal of the alternative parking area as proposed in the original application, has removed many of her concerns, she still has some misgivings with regard to the proposal's effect on the landscape.

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DM Officers do understand these concerns but would also note that the landscaping plan submitted does show the retention and further planting of the existing hedge to the front of the property. Furthermore, there is a line of existing trees and scrub on the coastal side of the South West Coastal Path at this point, which would further obscure views into the site.

Officers note that there is already a dwelling on the site and that the dwelling is in a poor state of repair and does not positively contribute to the character and appearance of the site. Replacing it with a dwelling of fairly similar scale, with low levels of visual massing and of a design and finish which will blend in well with its surroundings will therefore have an acceptable impact upon the surrounding landscape. As a result, the development, if approved, would not detract from the natural beauty of the National Park, As such, Officers are of the view that the effects of the development on the landscape here would not constitute a reason for the refusal of this proposal.

Effect on Ecology

Policy CE-S3 (Biodiversity and Green Infrastructure) of the Local Plan relates to biodiversity and green infrastructure and states that the conservation and enhancement of wildlife, habitats, and sites of geological interest within the National Park will be given great weight.

The previous application was withdrawn on Officer advice due to concerns that the issues of ecology and biodiversity had not been fully addressed within the proposal. The present application includes the following documents submitted within the proposal:

- Update Ecological Walkover, Seasons Ecology, April 2023 (letter dated 3 May 2023)
- CEMP, EMES and LEMP, Seasons Ecology (Issue 1, 10 May 2023) + updated figure (030723)
- Vehicle Management Plan (Milestone, *undated*)
- Bat Survey Report, Smart Ecology, July 2022 (Issue 2, October 2022)
- Badger Survey Report, Smart Ecology, July 2022 (Issue 1, July 2022)
- Preliminary Ecological Appraisal, Seasons Ecology, February 2022 (Issue 3, March 2022)

In this technical matter, Officers are reliant on the expert advice of the Authority's Wildlife Conservation Officer, who notes that the information contained within these reports is satisfactory. The Wildlife Conservation Officer notes that she had previously been concerned over the following issues:

- Potential impacts of construction-related traffic crossing the ford
 - Potential impacts of construction-related traffic resulting in erosion/collapse of the river bank
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- Ensuring no net-loss of biodiversity on site and seeking net gain in line with local and national policies
 - Ensuring appropriate management of invasive non-native species on site (specifically three-cornered leek)
 - Clarification of the proposed use of the area to the north of the property

However, the Wildlife Conservation Officer notes that these concerns have largely been addressed and further information provided upfront including the Ecological Mitigation and Enhancement Strategy and a Landscape and Ecological Management Plan further renders the proposal satisfactory.

The Wildlife Conservation Officer did request a Bat Survey, due to the proposed demolition of a number of rambling sheds on the site; this survey was received from the applicant and referred to the Wildlife Conservation Officer, who has responded that the details within this report are also deemed satisfactory.

Therefore, Officers conclude that any effects upon the ecology of the site have been addressed, and have added conditions to this report as requested by the Wildlife Conservation Officer, should the proposal be approved.

Flood Risk

As noted earlier in this report, whilst the site itself is situated within Flood Zone 1 (lowest level of risk) the area of the ford at the bottom of this part of the South West Coastal Path (approximately 500 metres away) is within Flood Zone 3. Therefore, a Flood Risk Assessment (FRA) has been submitted with the application and includes the following information:

'According to the information available from the Council's PFRA and the Environment Agency, there were no records of flooding from any sources at the site. According to the information obtained from the landowner, they were not aware of any flooding issues at the site. However, the River Horner is occasionally impassable across the ford by vehicle following prolonged periods of exceptionally heavy rainfall.'

This confirms that there is no risk to life at the site itself, due to its elevated position within Flood Zone 1. Furthermore, the current valid use of the site is for residential purposes, and the proposal, if approved, would not change or exacerbate this.

However, the information that the ford is occasionally impassable after particularly heavy rainfall must be considered, although it could be argued that this might increase due to climate change. This may render the passage of emergency service vehicles impassable in time of flooding, and there is no other readily available access route. However, the risk is considered low, as the ford is only impassable after particularly heavy rainfall, the proposal is considered to be broadly in accordance with Policy CC-D1 (Flood Risk) of the Local Plan, and thus not a reason for refusal of the application.

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The applicant has responded to Officers' concerns by submitting an updated Flood Risk assessment and a Flood Emergency Plan, which gives details of two alternative (if longer) routes of escape or for access for emergency service vehicles; flood mitigation measures, and a full Flood Emergency Plan. These documents have been referred to the Environment Agency, which now raises no objection, to the Lead Local Food Authority, who have declined to comment as the proposal is for less than ten dwellings; and the Fire and Rescue Service, from whom no response has been received. Officers have sought to minimise the impact of flooding upon the access by the inclusion of a condition requiring the inclusion of all mitigation measure noted within the submitted FRA, and the necessity of adhering to the proposals within the submitted FEP.

As such, Officers are satisfied that the issues of flood risk have been properly examined and answered.



Traffic Safety Issues

Policy AC-S2 (Transport Infrastructure) looks to encourage sustainable modes of transport and to ensure that proposals which include new access roads and parking provision is designed to reflect the character of the area. The policy seeks to retain the rural character of the highway network, incorporate wildlife enhancements, minimising lighting and take account of road safety interests.

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Policy AC-D1 (Transport and Accessibility requirements for Development) looks to ensure all opportunities have been taken to encourage safe and sustainable modes of transport and ensuring that design and details of highway works contribute to the conservation or enhancement of the area.

Policy AC-D2 (Traffic and Road Safety considerations for Development) seeks to ensure consideration is given to the capacity of the surrounding highway network.

Policy AC-D3 (Parking provision and Standards) clearly sets out the parking standards for new development. This policy also encourages cycle provision where considered appropriate.

The Construction Management Plan accompanying the application contains the following information:

'Vehicular access rights exist for Hurlstone Bungalow and have been in long-standing use since the construction of the bungalow in the 1920s. The legal access rights for the property are along Hurlstone Lane between Bossington and just north of Hurlstone Bungalow. The existing access rights allow for vehicles weighing over 3.5 tonnes to be used according to relevant conditions and prior notification to the National Trust.

All access to the site will be over the ford via Hurlstone Lane. The ford is relatively shallow in the summer months but can get significantly deeper with heavy rainfall in the winter months or flood waters. On these occasions no access will be allowable to the site by vehicle and all large deliveries/ unloading will be postponed. Navigation over the ford by vehicle will strictly only be allowable in safe conditions. Regard to the critical depth allowance in water for each vehicle will be required of all drivers. Crossing the river will not be allowable above this depth.

Hurlstone Lane narrows in two areas. In these locations it may be difficult for pedestrians, cyclists or horse riders to overtake vehicles. It is therefore proposed that construction vehicles use the waiting areas as proposed on the access plan when users of the path are travelling along the two narrower parts of the track. As it is difficult to see if members of the public are coming along the narrower parts of the track, it is proposed that two-way radio communication or mobile communication is used by the driver and designated members of the construction team to allow for the public to pass by unencumbered. Sufficient members of the construction team will be used for two-way radio communication in order to provide safe access depending on the type of vehicle traversing to or from the site.'

As noted earlier in this report, the only access to the site, for both pedestrians and vehicles, is via the South West Coastal Path, which is a fairly narrow, unmade path.

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The Traffic Management Plan accompanying the application notes that all deliveries of materials to the site would be carried out using four wheel drive vehicles and trailers, not lorries, to minimise the weight of these vehicle movements to no more than 3T. This will minimise any impact upon the underwater surface of the ford and the water itself.

Details are also included within the plan which will ensure that these vehicle movements shall be controlled so as not to adversely affect the safety or enjoyment of walkers and riders.

As such, Officers are satisfied that there will be no adverse effect on safety during the period of construction.

After construction, as noted above, the property already enjoys access rights for a domestic dwelling, and the proposal would not change this situation.

Climate Change

In May 2019 the UK government declared a climate emergency, Exmoor National Park followed this by declaring a Climate Emergency in October 2019. To help meet this challenge the Local plan includes policies which seek to influence, contribute and challenge development to help meet the Climate Emergency.

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Policy GP1 of the Local Plan sets out that the need to consider future generations, through sustainability and resilience to climate change and adapting to and mitigating the impacts of climate change. Policy CC-S1 states that climate change mitigation will be encouraged, development which reduces demand for energy, using small scale low carbon and renewable energy, looks to situate development which avoids sites that would put wildlife at risk together with measures which avoids the risk of flooding. Policy CC-S5 seeks to support small scale renewable energy schemes that assist in contributing towards reducing greenhouse gas emissions and moving towards a carbon neutral National Park and Policy CE-S6 seeks to incorporate sustainable construction methods which future proof against climate change impacts, including flood risk.

Paragraph 152 of the National Planning Policy Framework prescribes that the planning system should support the transition to a low carbon future in a changing climate taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

The bungalow has been designed to be eco-friendly and off-grid. The dwelling has been designed to exist off-grid without the use of fossil fuels by utilising an array of solar panels, a biomass boiler, increased thermal insulation, and airtight construction techniques. All heating will be produced on site by a biomass wood-pellet boiler. Biomass boilers are considered a renewable and carbon-neutral form of energy because the same amount of carbon dioxide that is released by the burning process is later re-absorbed by growing plants. Particulate matter and dust emissions are an ongoing issue in the heating industry. In order to stop particulates from the biomass boiler from entering the atmosphere the boiler is proposed to be fitted with a filter.

An array of photovoltaic solar panels is required to provide a renewable source of electricity for the off-grid bungalow. These PV panels will be located on the top parts of the bungalow roofs in order to obtain the maximum amount of sunlight. The proposed number of photovoltaic panels has been reduced since the original planning application in 2021. The array is expected to produce 9.38 KWp, which when used in conjunction with a sufficiently sized battery and inverter would meet the bungalows general electricity requirements of approximately 7.7 kWh per day.

Therefore, in the medium to long term, Officers consider that the impact on the climate resulting from the construction of the proposed development and its ongoing use would produce a very-low carbon dwelling, replacing one which has little thermal insulation and would rely on fossil fuels for power, light, heat, etc.. As such, Officers are of the opinion that the development, if approved, would not have an adverse impact on the natural environment or on climate change.

Other Matters

Officers acknowledge the level of concern noted by local residents, and some of those concerns have been addressed in the above report. In response to concerns not already covered:

- The site is located approximately 600 metres from Bossington village, and is thus unlikely to impact upon the character and appearance of the village
- The present residence has full C3 Dwelling House rights, and any restriction on the use of the property would therefore be unreasonable.
- The height of the front hedge is something that cannot be controlled by planning conditions, which must be both reasonable and enforceable
- A condition is appended below to ensure against any exterior lighting to the site.

Human Rights

The provisions of the Human Rights Act 1998 and Equality Act 2010 have been taken into account in reaching the recommendation contained in this report.

Conclusion

In conclusion, whilst the proposal is fairly finely balanced, Officers are of the opinion that the applicant has satisfied previous concerns, and that the proposal should be approved, subject to strict accordance with the Conditions noted below.

Recommendation

Planning permission is granted subject to the strict accordance with the following conditions:

- 1) The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: In accordance with Section 91 of the Town and Country Planning Act 1990 (as amended).

- 2) The development hereby permitted shall not be carried out except in complete accordance with the submitted site plan, location plan and drawings numbered P.000 A, E.021, P.035, P.006, E.004, E.002 and P.025 date stamped 23rd May

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2023, and P.015 A dated stamped 8th August 2023 unless otherwise required by condition below.

Reason: For the avoidance of doubt and to ensure the development accords with the approved plans.

- 3) Should any contamination of soil or groundwater not previously identified be discovered during development, the Local Planning Authority should be contacted immediately. Site activities within that sub-phase or part thereof, should be temporarily suspended until such time as a procedure for addressing such contamination, within that sub-phase or part thereof, is agreed upon with the Local Planning Authority or other regulating bodies.

Reason: To ensure that any contamination existing and exposed during the development is identified and remediated.

- 4) During construction no machinery shall be operated, no process shall be carried out and no deliveries taken at or dispatched from the site outside the following times:
 - a) Monday - Friday 08.00 - 18.00,
 - b) Saturday 09.00 - 13.00
 - c) at any time on Sunday, Bank or Public holidays.

Reason: To protect the amenity of local resident..

- 5) Prior to the use on site of any external surface material, precise details, to include samples, of the materials to be used in the construction of the external surfaces of the development hereby permitted (roofs, walls, guttering, downpipes and flues) shall be submitted to, and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details.

Reason: To safeguard the visual amenity and landscape character of the National Park.

- 6) Prior to their installation details of the doors & windows, (including sections, mouldings and profile) to be used on the development hereby permitted shall be submitted to and approved in writing by the Local Planning Authority. For the avoidance of doubt the doors and windows shall be timber and thereafter shall be retained.

Reason: To safeguard the visual amenity and landscape character of the National Park.

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- 7) Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order revoking and re-enacting that Order with or without modification), no fences, walls, gates or other means of enclosure, extensions, additional windows, dormer windows or roof-lights, no buildings, enclosures, swimming or other pools, works and structures shall be constructed or carried out or shall be erected within the red lined area without the prior written approval of the Local Planning Authority.

Reason: To safeguard the visual amenity and landscape character of the National Park.

- 8) Notwithstanding the information submitted, there shall be no external lighting on the site unless first agreed in writing by the local planning authority.

Reason: In the interests of the character and appearance of the landscape and local amenity, and in the interests of the tranquillity and dark sky experience of the National Park.

- 9) Any trees identified as being retained on the approved plans shall not be cut down, uprooted or destroyed, nor shall any retained tree be topped or lopped other than in accordance with the approved plans and schedule, without the approval, in writing, of the Local Planning Authority. Any tree works approved shall be carried out in accordance with British Standard 3998 (Tree Work).

If any retained tree is removed, uprooted or destroyed or dies, another tree shall be planted at the same place during the next planting season unless agreed otherwise by the Local Planning Authority and that tree shall be of such a size and species, and shall be planted at such time, as may be specified in writing by the Local Planning Authority.

Reason: To enable the Local Planning Authority to consider details not sufficiently provided as part of the current application, to assimilate the development into the landscape and to safeguard the appearance and character of this part of the National Park.

- 10) Prior to the commencement of any works on site, Protective fencing shall be erected around each tree or tree group to be retained in the vicinity of development operations in accordance with the recommendations given in British Standard 5837: 2012 (Trees in Relation to Construction) unless otherwise agreed, in writing, by the Local Planning Authority. No burning shall take place within 20 metres of the furthest extent of the canopy of any tree or tree group on site or on land adjoining the application site. No trenches, pipe runs or drains shall be dug within the canopy spread of any trees retained on the site or on land adjoining unless agreed otherwise, in writing, by the Local Planning Authority; and all such installations shall be in accordance with the advice given in National Joint Utilities Group Publication

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Number 10.

Reason: To enable the Local Planning Authority to consider details not sufficiently provided as part of the current application, to assimilate the development into the landscape and to safeguard the appearance and character of this part of the National Park.

- 11) Before the development hereby permitted is commenced, a copy of the European Protected Species Licence for the site shall be submitted to and acknowledged in writing by the Local Planning Authority.

Reason: In the interests of preserving from harm and Protected Species on the site.

- 12) The recommendations noted within the Construction and Environmental Management Plan, Environmental Mitigation and Enhancement Strategy and Landscape and Environmental Management Plan (Seasons Ecology (Issue 1, 10 May 2023) + updated figure (03/07/23)) shall be strictly adhered to during the carrying out of the development hereby permitted, with evidence of the work completed by the Ecological Clerk of Works including a Toolbox Talk and supervision of work being submitted to the LPA to discharge the condition. This should also include evidence of the toolbox talk being given to all new members of the site team as part of their induction by the Biodiversity Champion.

Reason: In the interests of protecting ecology and biodiversity.

- 13) Prior to the commencement of development hereby approved, details of a scheme for the retention of the badger sett(s), including the establishment of a five metre exclusion zone around the setts from which all building, engineering and other operations and all vehicles and personnel working on the site should be excluded, shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include details of the means of fencing off the exclusion zone and restoration of the area around the exclusion zone within three months of completion of the development. The development shall be carried out in accordance with these approved details.

Reason: To protect the badgers setts from damage or disturbance during development operations bearing in mind the animal and its sett are specially protected by law.

- 14) No vegetation removal or demolition works shall take place between 1st March and 31st August inclusive, unless a competent ecologist has undertaken a careful, detailed check for active birds' nests immediately before the work

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and provides written confirmation that no birds will be harmed and/or that there are appropriate measures in place to protect nesting bird interest on site. Any such written confirmation should be submitted to the Local Planning Authority by the ecologist.

Reason: In the interests of protecting nesting birds on the site.

- 15) The development hereby permitted shall be carried out in strict accordance with the Flood Mitigation Measures contained within the Combined Flood Risk Assessment and Flood Emergency Plan carried out by UK Flood Risk and received 4th August 2023.

On first occupation and thereafter, the measures incorporated within the Flood Emergency Plan shall be strictly adhered to in the event of a flood during the lifetime of the development unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interests of preserving life and incorporating measures to reduce flood risk.

Informatives

POSITIVE & PROACTIVE STATEMENT

This Authority has a pro-active approach to the delivery of development. Early pre-application engagement is always encouraged. In accordance with the requirements of Paragraph 38 of the Town and Country Planning (Development Management Procedure) (England) Order 2015, in determining this application, Exmoor National Park Authority has endeavoured to work positively and proactively with the applicant, in line with the National Planning Policy Framework, to ensure that all relevant planning considerations have been appropriately addressed to try and achieve a positive outcome.

PRESENCE OF BATS

The applicant is advised that under the Wildlife and Countryside Act 1981 it is an offence to kill or injure bats, to disturb them when roosting, to destroy roosts or to block entrances to roosts. It is strongly recommended that an investigation is undertaken by a licensed bat worker prior to any demolition or refurbishment works being carried out, to ensure that no bats are present in the existing buildings.

If evidence of the presence of bats is found, advice should be sought immediately from Natural England on steps which can be taken to avoid contravention of the above Act.

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Furthermore, if bats or a bat roost is identified a licence under the Conservation (Natural Habitats) Regulations 1994 is likely to be required before works can commence. The applicant is strongly advised to take specialist advice if bats or a bat roost may be present and that the contact for applying for a licence is the Licensing Officer, European Wildlife Division, Department of Environment Food and Rural Affairs, Room 1/08, Temple Quay House, 2 The Square, Temple Quay, Bristol, BS1 6EB (0117 372 8903).

MONITORING OF DEVELOPMENT

The applicant/developer is reminded that it is their responsibility to ensure that the requirements of each planning condition are met and that the works are undertaken in accordance with the approved plans. Any failure to meet the terms of a planning condition or work which does not accord with the approved plans leaves the applicant/developer liable to formal action being taken. The National Park Authority endeavours to monitor on site the compliance with conditions and building works. This has benefits for applicants and developers as well as the National Park. To assist with this monitoring of development the applicant/developer is requested to give at least fourteen days notice of the commencement of development to ensure that effective monitoring can be undertaken. The Planning Section can be contacted at Exmoor National Park Authority, Exmoor House, Dulverton, Somerset, TA22 9HL or by telephone on 01398 323665 or by email plan@exmoor-nationalpark.gov.uk.

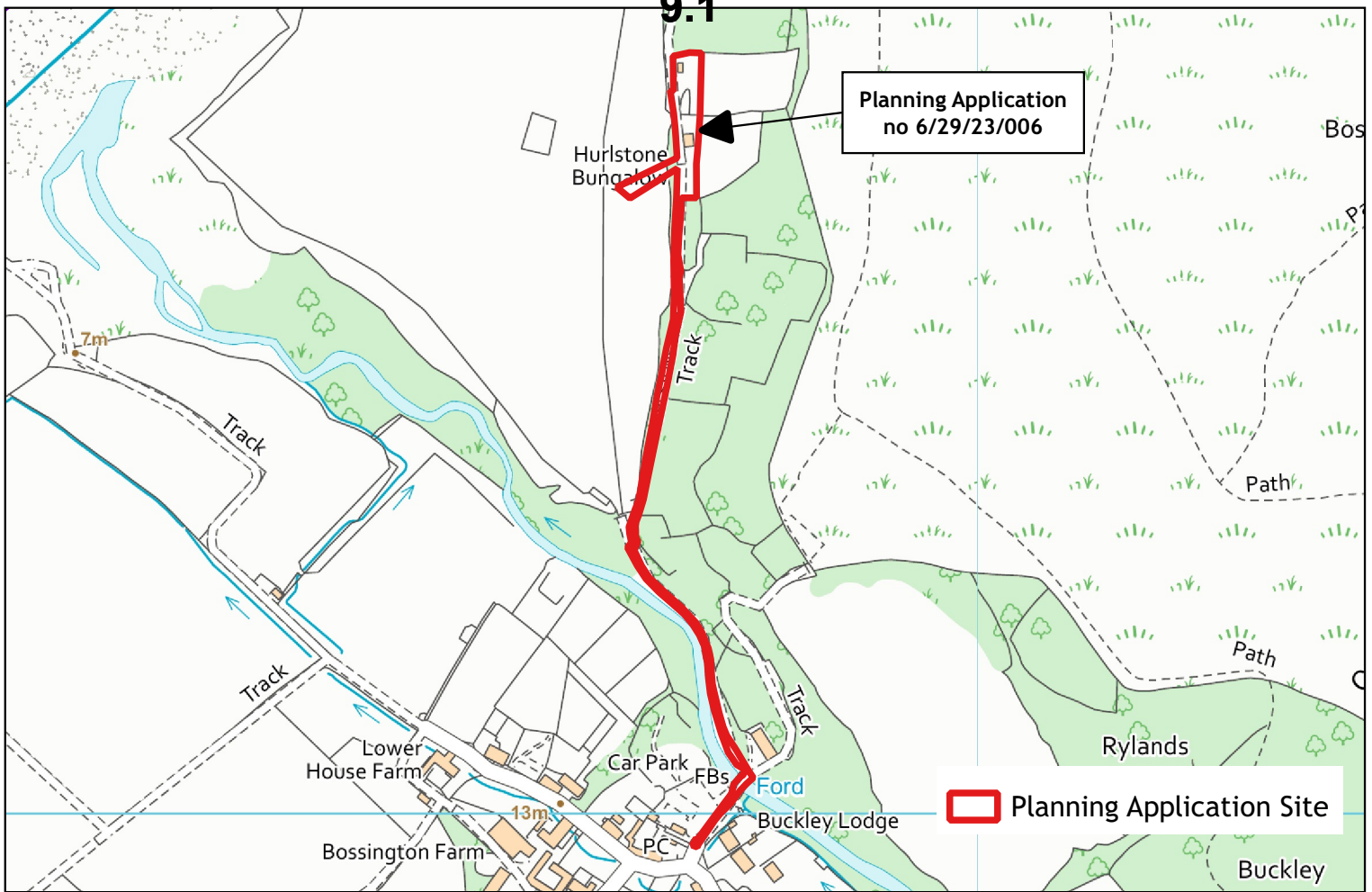
CONDITIONS AND INFORMATIVES AND THE SUBMISSION OF FURTHER DETAILS

Please check all the conditions and informatives attached to this Decision Notice. If there are any conditions which require submission of details and/or samples prior to work commencing on site it is vital that these are submitted and agreed in writing by the Local Planning Authority before work starts. Given the High Court's interpretation of the Planning Acts and their lawful implementation it is unlikely that the Local Planning Authority will be able to agree to a sample/details after the commencement of works if that sample/details should have been approved prior to commencement. If a sample/detail is not agreed as required prior to commencement and works have started then it is likely that this matter may only be able to be rectified by the submission of another application. To avoid delay, inconvenience and the need to submit a further application, please ensure that all appropriate details/samples are submitted and agreed at the specified time.

Please also note that due to other decisions of the High Court it is now not normally possible for the Local Planning Authority to agree to minor amendments to approved applications. It will be necessary to adopt a formal approach and that if changes to approved plans are proposed then it will be necessary to make a new planning

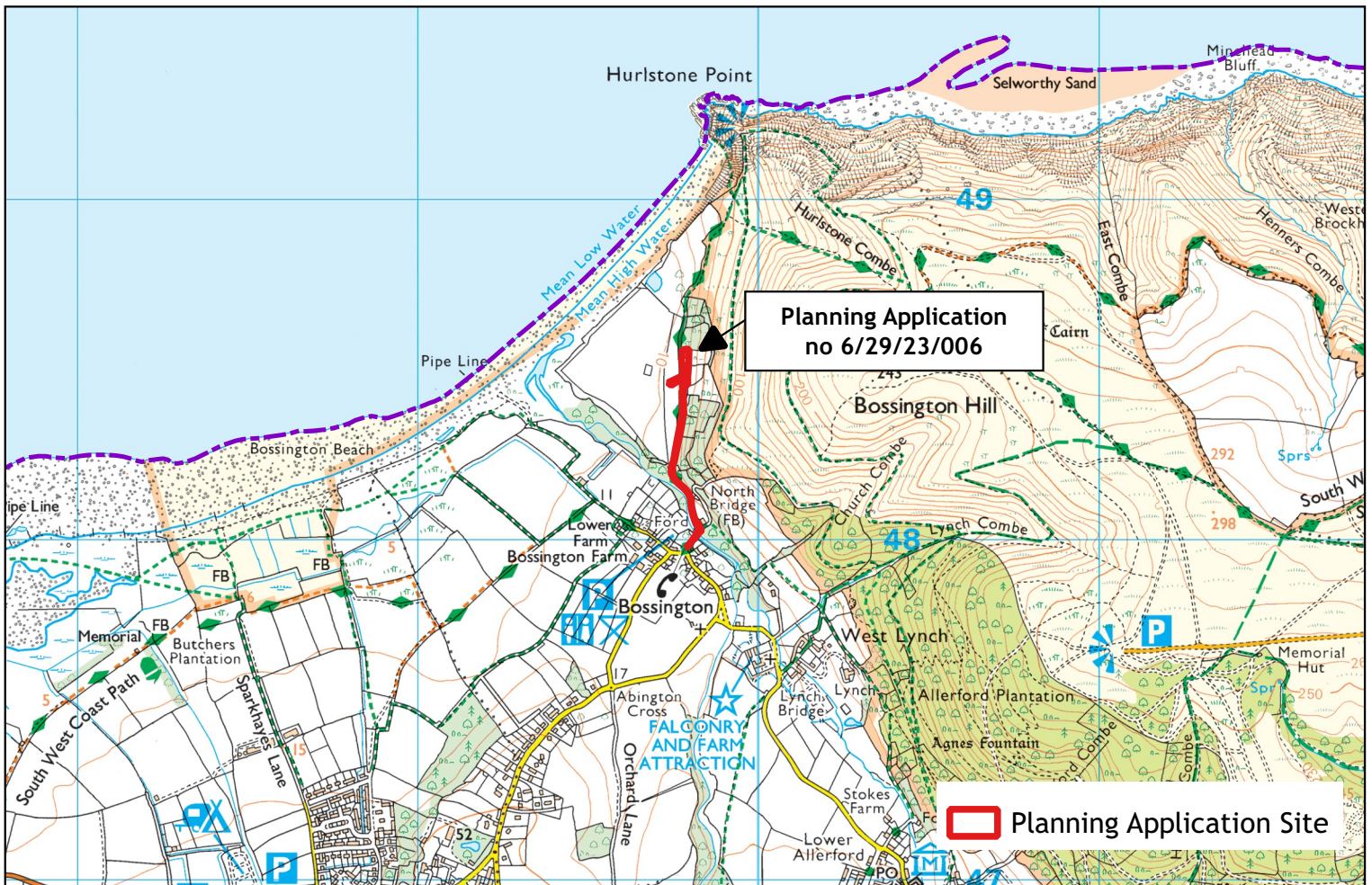
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application. Please ensure that works comply with the approved plans so as to avoid the possibility that works are unauthorised and liable for enforcement action.



Site Map
Scale 1:5,000

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Overview Map
Scale 1:20,000

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Committee Report

Application Number:	62/50/23/002
Registration Date:	23-Feb-2023
Target Determination Date:	19-Apr-2023
Extension of Time:	
Applicant	Parracombe CLT
Agent:	Mr. M Sicolo, Sicolo Webb Architects Ltd
Case Officer:	Dean Kinsella
Site Address:	Land West of Parracombe Lane, Easting: 267024, Northing: 145131
Proposal:	Proposed construction of 6no. dwellings with associated landscaping and highways works including new road access to Parracombe Lane.
Recommendation:	Approve with conditions
Reason for bringing before Authority Committee:	The Head of Planning and Sustainable Development consider the proposed development has generated a number of comments from local residents which would benefit from the consideration of the Planning Committee.

Relevant History

None relevant

Site Description & Proposal

The proposed site is located on the south-west facing hillside on the valley of the River Heddon to north east of the village of Parracombe. The site is the south-east corner of an existing agricultural field. The majority of the site sits outside, but adjacent to the Parracombe Conservation Area which runs along the southern and eastern sections of the field. However, a section of public highway which is included in the redline does site within the conservation area.

The site slopes from north to south with the nearest building some 65 metres to the south of the site. The land is bounded by hedgerows on all sides with Parracombe Lane to the east.

The proposed development seeks the erection of 6 Local Needs Affordable Dwellings split between two blocks of buildings set in a 'L' shape with a courtyard style area situated centrally within the site providing parking and communal outside space.

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Access to the site is sought off an existing gated entrance that would be altered to meet the required access standards. The dwellings, as proposed, would be two storeys with 4 dwellings forming a terrace of properties to the south and two dwellings to the east. Each property having a private amenity space and access to parking. The dwellings would include a slate pitched roof, with a catslide rear roof slope providing the appearance of a single store building to the rear. The walls will be clad in render and slate hanging with some timber cladding around doorways. The guttering is proposed to be metal with the doors being timber and the windows proposed to be Aluminium.

Around the site also includes informal green spaces together with an access point to the north west of the site providing agricultural access to the remainder of the agricultural field.

Consultee Representations

South-West Water - no objection subject to the foul and surface water drainage being managed in accordance with the submitted drainage strategy.

Clean Potable Water

South-West Water is able to provide clean potable water services from the existing public water main for the above proposal. The practical point of connection will be determined by the diameter of the connecting pipework being no larger than the diameter of the company's existing network.

Foul Sewerage Services

South West Water is able to provide foul sewerage services from the existing public foul or combined sewer in the vicinity of the site. The practical point of connection will be determined by the diameter of the connecting pipework being no larger than the diameter of the company's existing network.

The applicant can apply to South West Water for clarification of the point of connection for either clean potable water services and/or foul sewerage services.

Surface Water Services

The applicant should demonstrate to your LPA that its prospective surface run-off will discharge as high up the hierarchy of drainage options as is reasonably practicable (with evidence that the Run-off Destination Hierarchy has been addressed, and reasoning as to why any preferred disposal route is not reasonably practicable):

1. Discharge into the ground (infiltration); or where not reasonably practicable,

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2. Discharge to a surface waterbody; or where not reasonably practicable,
3. Discharge to a surface water sewer, highway drain, or another drainage system; or where not reasonably practicable,
4. Discharge to a combined sewer. (Subject to Sewerage Undertaker carrying out capacity evaluation)

Having reviewed the applicant's current information as to proposed surface water disposal for its development, please note that method proposed within the FRA to discharge into the ground (infiltration) is acceptable and meets with the Run-off Destination Hierarchy.

North Devon District Council Planning – No Observation

Future Landscape Officer - Following pre app consultation, a LVA has been prepared to assess the potential impacts on landscape character and visual amenity. It demonstrates that the development would be visually well contained in longer distance views and become absorbed into the settlement pattern and wider landscape setting. From close range viewpoints the development would be more prominent and result in a greater degree of change in the scene, particularly from the adjacent lane. In terms of landscape character and setting, the scale of the development is proportionate to the settlement, it relates well to the road and landform and reflects the pattern of built form in the settlement, which is characterised by ribbon development and open spaces/fields behind and between properties.

The proposed layout was discussed at pre-app and has been taken forward to the application with minor changes. There are now two parking spaces per dwelling plus one visitor parking space for the development. The nearest off-site parking is at the pavilion stores and cafe, so I am of the view that accommodating additional visitor spaces within the development is needed.

In terms of detailed layout design, there is very little space for the patios between the two houses parallel to Parracombe Lane and the existing hedgerow. How the hedgerow will be protected and maintained into the future will be important as I am concerned that the hedgerow could be at risk of being cut back hard to make more room and make the space usable as a patio. A wider paved area to each side of these properties would provide an alternative, more useable patio space with just a path leading to each rear storage shed.

No landscape proposals plan has been submitted. Detailed information on the proposed planting will be required for trees, hedgerows and grass / wildflower mixes, to include ground preparation, species, mixes, density and sizes as well as maintenance within the amenity spaces, boundaries and swale/wetland. Detail on the types of boundaries to

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rear private gardens will also be required and should reflect the character of the rural setting.

The proposed material to the parking spaces is permeable, cellular grass crete. Permeable block paving to the access road would further reduce runoff and reliance on the swale. This could be applied to areas indicated as non-permeable block paving, or at least the block paved areas leading from the main/field access. This would reduce the capacity requirement for the swale and enable it to become a more usable amenity space and reduce the likelihood of the swale having to be fenced off for safety reasons.

Whilst the site is not in the core or buffer zone, it is within the wider Exmoor National Park Dark Sky Reserve and close to the buffer zone. All proposed external lighting should comply with requirements to minimise obtrusive light, including shielded fittings, timers and sensors. Internal light spill from roof lights should also be considered and mitigated as far as possible.

North Devon Environmental Health - I have reviewed this application in relation to Environmental Health matters on behalf of North Devon Council's Environmental Protection service and comment as follows:

1 Land Contamination

I have reviewed the Terrafirma Phase 1 Contaminated Land Desk Study Report dated July 2021. The report does not identify any significant contamination risks associated with the proposed development. The report recommends a watching brief be maintained during development works to address the risk that unexpected contamination is encountered once works commence.

Given the above, I recommend the following condition be included on any permission:

- Contaminated Land (Unexpected Contamination) Condition

A watching brief shall be maintained during groundworks at the site. Should any suspected contamination of ground or groundwater be encountered, the Local Planning Authority shall be contacted immediately. Site activities within that sub-phase or part thereof shall be temporarily suspended until such time as a procedure for addressing the contamination is agreed upon with the Local Planning Authority or other regulating bodies.

Reason: To ensure that any contamination exposed during development is remediated in accordance with the National Planning Policy Framework

2 Construction Phase Impacts

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In order to ensure that nearby residents and road users are not unreasonably affected by dust, noise or other impacts during the construction phase of the development, I recommend the following conditions be included on any permission:

- Construction Environmental Management Plan Condition

Prior to the commencement of development, including any site clearance, groundworks or construction (save such preliminary or minor works that the Local Planning Authority may agree in writing), a Construction Management Plan (CMP) to manage the impacts of construction during the life of the works shall be submitted in writing for the approval of the Local Planning Authority. For the avoidance of doubt and where relevant, the CMP shall include:-

- a) details of control measures for addressing fugitive dust from earthworks and construction activities; dust suppression;
- b) a noise control plan which details hours of operation and proposed control measures;
- c) specified parking for vehicles associated with the development works and the provision made for access thereto;
- d) the times within which traffic can enter and leave the site;
- e) details of measures to prevent mud contaminating public footpaths and roads;
- f) details of arrangements for materials deliveries, storage and waste materials removals;
- g) a point of contact (such as a Construction Liaison Officer/site manager) and details of how any complaints will be addressed.

The details so approved and any subsequent amendments as shall be agreed in writing by the Local Planning Authority shall be complied with in full and be monitored by the applicants to ensure continuing compliance throughout the development.

Reason: To minimise the impact of the works during the construction of the development in the interests of highway safety and to safeguard the amenities of local residents from potential impacts whilst site clearance, groundworks and construction is underway.

- Construction Hours Condition

During the construction phase no machinery shall be operated, no process shall be carried out and no deliveries taken at or dispatched from the site outside the following times:

- a) Monday - Friday 08.00 - 18.00,
- b) Saturday 08.00 - 13.00
- c) nor at any time on Sunday, Bank or Public holidays.

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Reason: To protect the amenity of local residents

ENPA Wildlife Officer – Object - Given the nature of the application, it is good that an ecology report has been submitted (Preliminary Ecological Appraisal, Devon Wildlife Consultants, ref 21/3719.01, April 2021). However, unfortunately the follow up ecology work recommended within the report has not yet been completed. This includes both bat and dormouse surveys. These should be completed prior to determination of the application and an Ecological Impact Assessment provided with reference to the detailed designs for the site.

I note the proposed planting on site including a wildflower/meadow mix and wetland mix along with hedgerow planting, which is welcomed. There are also opportunities for incorporated bird and bat boxes in the new buildings which could be incorporated into the plans.

ENPA Wildlife Officer – No Objection - Further to my previous comments dated 15 March 2023 and discussions in August, it is good to have received an updated ecology report, amended plans and the BNG metric. My previous objection primarily related to the lack of further survey work as recommended in the Preliminary Ecological Appraisal (Devon Wildlife Consultants, ref 21/3719.01, April 2021), to inform an Ecological Impact Assessment. I also recommended the incorporation of bat and bird nesting opportunities.

We have now received an Ecological Impact Assessment (GE Consulting, ref 1911-EcIA-LH, dated 11 July 2023). The methods, presentation of results and recommendations within the report are generally satisfactory. The report details the findings of a desk study and extended UK Habitat Classification survey undertaken in April 2023. The site comprises an area of modified grassland bounded by native species-rich hedgerows on two sides. Native species-rich hedgerow along the eastern boundary likely to qualify as important under the Hedgerow Regs due to the presence of seven woody species within a 30m stretch. The site was identified as providing opportunities for badger, foraging and commuting bats, nesting birds, dormice, hedgehog and common reptiles, but as being of no more than local importance for any species. Due to the size of the site and extent of vegetation removal proposed, further surveys were not considered necessary and a precautionary approach recommended.

Appropriate avoidance, mitigation and compensation measures have been recommended including sensitive methods and timing of works, pre-works checks and a watching brief as detailed in Section 5 of the report. These recommendations must be strictly adhered to, and evidence of their implementation provided. Please secure these by way of appropriate condition.

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The proposal incorporates enhancements for wildlife in terms of integrated bat boxes, integrated bird boxes, integrated invertebrate bricks, hedgehog holes and reptile refugia which is very positive. Recommended positions for these features are shown on Figure 2. Again, these recommendations should be adhered to, and evidence of their implementation provided. Please secure these by way of appropriate condition.

The ecologist has also demonstrated that Biodiversity Net Gain is achievable. Biodiversity Metric 4.0 has been used and shows net gain of 11.23% for habitat units and 64.72% for hedgerow units. It has not been made clear how this will be managed, who the responsibility for management will fall to or what monitoring is proposed. Whilst BNG has not become mandatory yet, it would be good to be clear on this so that the proposed benefits can be achieved and maximized. This could also include a Landscape and Ecological Management Plan. Please secure this by way of appropriate condition.

The site lies within 2km of Exmoor & Quantock Oakwoods SAC. Whilst the site does not lie within the consultation zones, the habitats adjacent to and bounding the site (namely the hedgerows) could be used by foraging and commuting bats, including those for which the SAC is designated. These are rarer and light-sensitive species and therefore sensitive lighting is essential. Please secure this by way of appropriate condition.

Whilst the site lies within the Impact Risk Zone of nearby SSSIs, guidance does not recommend consultation with Natural England in this instance.

I also recommend a Construction Environmental Management Plan (Biodiversity) is conditioned.

North Devon Housing Authority – Affordable Housing - NDC Local Housing Authority fully support the CLT's application for their scheme of 6 high-quality sustainable social rent homes on Parracombe Lane.

Providing 100% of homes at a genuinely affordable rent at social rent is welcomed. The 2-bed homes are a maximum occupancy, the 3-bed homes allow for a single additional bedspace on the ground floor should a family grow or have additional medical requirements in the future and all homes are to Nationally Described Space Standards.

The Housing Needs Survey carried out in 2017 covered the 4 parishes of Parracombe, Kentisbury, Trentishoe and Martinhoe and supports a minimum of 5 in need of affordable housing. Latest data from DHC in January 2023 shows those living in the parish in housing need as Parracombe (4), Kentisbury (4), Trentishoe (1) and Martinhoe (3). Local connection is not confirmed at this point as it is assessed at a later stage but equally this figure also does not include the many households who do not register on DHC because they don't think a rural scheme will materialise (and this often increases

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as more locals see work on the ground) and also does not include people who live elsewhere but hold a local connection to the parishes and may wish to return.

Parracombe CLT have been working extremely hard to produce a scheme that will be to the benefit of their local community whilst also meeting planning policy requirements and in most cases exceeding them (e.g. social rent and building regs). The volunteers have been working in tandem with Middlemarch, ENPA planning and planning policy, ward members, the Parish Council and NDC supported by NDC's Community Housing Fund. NDC's March Strategy and Resource Committee has also just approved gap-funding the build costs of the scheme alongside an RP and Homes England subject obviously to planning.

I met with the Policy and Community Manager recently and one of things we discussed was the latest draft of the LLP submitted with the application. I know she sent an update to you, but I do think the changes we came up with could be acceptable to the CLT whilst also ensuring that the LLP doesn't conflict with the Local Plan local connection definition. We felt that the changes proposed in this way, added detail to the Local Plan definition in HC-S3 and does not conflict with it. I have sent these back to the CLT who may submit a revised LLP alongside the application.

Finally, regarding the LLP being appended to the s106. What we are saying by doing an LLP is that the properties will be allocated "in a different way to the usual approach" (i.e. what is presented in the ENPA Local Plan). As above, the CLT are going tighter on some of the Local Plan policy criteria around local connection. So the Local Plan is dealing with housing allocation issues already and saying affordable dwellings can only be allocated to those with the following local connection criteria. Clearly, it cannot go against the Local Plan but can go tighter/in more detail.

Many issues nowadays are added into AH SPDs and s106s that traditionally would have not have been. This is because many traditionally housing-related issues will ultimately directly impact the planning policy objectives and permission. For example, there is a chapter on Housing Affordability in Exmoor National Park within Part 6 (housing) of the ENPA Local Plan, which deals with Income, House Prices, Rental Levels and Affordability. Take for example a traditionally housing issue of how much service/management charges should be added to the rent – unless this is considered/limited/set through planning policy, it can ultimately make a scheme unaffordable. Take the allocation – unless specific advertising/allocation systems are outlined for each tenure the very people affordable housing is supposed to reaching are missed and supply being so limited in National Park Areas it's important to ensure it goes to the right people. I have seen many LPAs outline sales plans/marketing plans and lettings plans within the planning requirements i.e. in the s106. I think Ruth and I will be discussing this further generally but I wanted to outline it here for the purpose of this planning application and the s106 it may generate.

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This is why NDC is intending to attach the LLP to the section 106 on CLT schemes (albeit with a few alterations to the current CLH template). I have left a message for DNPA for a view on LLPs being included in the s106 where the LPA is separate to the LHA, however as I say above “housing” often become “planning” issues and take for example East Herts District Council they define Local Lettings Policies as: These are also known as planning obligations, and are agreements made under Section 106 of the Town and Country Planning Act 1990.

ENPA – PROW Officer - Public footpath 250FP14 leaves Parracombe Lane approximately 60 metres north of the proposed development but does not appear to be affected by the proposals.

ENPA Historic Buildings Officer - As the current Conservation Area appraisal states, much of the special interest of Parracombe is in the historic pattern of settlement, which developed into four geographically discrete hamlets, within an open pastoral landscape in the valley of the River Heddon. All of the hamlets have early origins.

The architectural character of the village is predominantly 19th century although many of the buildings have earlier origins. Buildings tend to be plain with little in the way of architectural detailing although here are a few notable exceptions. The Conservation Area contains 19 listed buildings (the actual total is far more as some of the list entries include groups of structures). Seven of the list entries are church yard structures in the church yard of St Petrocks Church. The proposed development sites lies just outside the Conservation Area to the north and west.

It will be visible from a number of viewpoints in and around the Conservation Area. Due to the landform in Parracombe this is hard to avoid. The LVA assesses the potential impact on the landscape character and visual amenity. As the Future Landscapes Officer has remarked in her response, it demonstrates that the development would be visually well contained in longer distance views and become absorbed into the settlement pattern and wider landscape setting. I am of the view that the scheme in general is likely to cause a less than substantial level of harm to the setting of the Conservation Area and a number of the listed sites it contains-most notably the grade I listed Church of St Petrock.

Paragraph 200 of the NPPF (National Planning Policy Framework) states that:

Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

Paragraph 202 goes onto state that:

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Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

I would be of the view that the public benefit the scheme provides, by-way of affordable housing to the area, offsets the harm caused to the designated heritage assets.

I therefore support the application in principal but do have some concerns. One area where I do see a potential conflict against the Local Plan is around the proposed aluminium composite timber windows and doors. Policy CE-S6 requires high quality sustainable design that conserves and enhances local identity and the distinctiveness of Exmoor's built and historic environment. It also refers to applicants demonstrating design principles including that design and materials complementing the local context (1b). The design of the scheme including the windows and doors and their material need to meet these tests. Policy CE-S6 is clear that materials need to be traditional / natural and paragraph 4.147 states that the NPA expects windows and doors should be constructed of timber. It is for the applicant to show why they consider there are overriding considerations. Legally, development needs to be in accordance with the development plan unless material considerations indicate otherwise.

I am not sure why the points in the design and access statement about the fenestration material "chosen for its honesty of expression and reflects the simple and direct approach to detailing that is typical of rural vernacular buildings" couldn't be achieved in timber which after all is what most vernacular windows in traditional buildings were made of. I would also ask that the design of the window is revisited as the glazing bar pattern does not reflect those seen in the wider Conservation Area. I also support the view of the Future Landscape Officer in her requirement to see a landscaping proposal as she has outlined. I would suggest that a number of materials are approved by condition. These include the roof slates, the wall hung slate, and the timber cladding. Detail of the external hard landscaping finishes should be shown in the landscaping proposal. All rooflights should be flush fitting

Representations

A total of 23 letters of representation have been received, with 18 letters of support and 5 letters of objection.

In objecting to the scheme, the following comments were made:

- There have been two previous planning applications for affordable housing. For those applications, each household received a questionnaire to ascertain the residents'

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views and the level of requirement for affordable housing in the village. I have received no such questionnaire this time round.

- In the past, I expressed the view that very few young people would choose to live in the village due to the lack of employment prospects in the area. Both of my children, as expected, have moved away from the area in order to pursue a career. The prospects for employment in North Devon have not improved.
- I am also concerned that if permission is granted for this application, it will set a precedent for more planning applications to be made in the village.
- This is an unspoilt village with a unique rural character, in a designated conservation area, within the National Park. We do not want this character altered by development which could expand beyond the current parameters being applied for.
- The existing infrastructure - drains, sewers, water supply, power etc. is barely adequate to cope with the needs of the village as is, without adding to it.
- The proposed access road will decant into Parracombe Lane, a narrow road with no pavement so walking into the village will be hazardous, especially for children going to school.
- Traffic through the village is already difficult, so any increase will exacerbate the problem. There are no pavements on a very narrow road.
- This is a major development and as such will cause tremendous disruption to the whole village, but especially to those residents living next to the site, with unacceptable levels of noise, dust pollution and heavy plant manoeuvring.
- There may be a demonstrable need in Devon for more housing but that is not within Parracombe.
- Currently there are 14 holiday homes empty for large periods of the year, in the village and 4 unoccupied. There are single people living in housing association 3-bedroom houses. So, there are other ways to sort out any housing issues with accommodation within the village.
- Supporter's mention that the new houses will be part of Parracombe community, they won't be, they have been put outside the confines of the village, not very welcoming.
- If you check the figures for Day 1 it can be seen that:

Northbound speeds, 67% were above 20MPH, top speed 30 MPH.

Southbound speeds, 74% were above 20 MPH, top speed 31 MPH.

Day 2:

Northbound speeds, 73% were above 20 MPH, top speed 34MPH.

Southbound speeds, 67% were above 20MPH, top speed 30MPH.

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It would appear to be a little misleading to state “but the average speed is only 23 MPH” when children and older people will be having to walk down that hill, without pavements, in all weathers and dark nights. Have any representations been made to Devon Highways for traffic calming measures, the entrance to the site currently comes out onto a 60 MPH road.

If the development goes ahead, has any provision or thought been made regarding probable disruption to vehicle access and the bus route which serves the village, during the road and drainage works. There are people in the village who would be isolated without the bus service.

- we are concerned about the establishing of the “wetland area” on the South East corner of the site. It is directly behind one of our Barns, which are over 100 years old. The rear of this building had to be rebuilt 3 years ago due to the rear wall collapsing because of water ingress due to inclement wet weather and fields becoming sodden. What provisions would there be to prevent this proposed wetland from flooding and entering our property.
- The drains on the hill are inadequate and blocked, poorly maintained by Local Authority, recent heavy rain has resulted in streams of water flowing rapidly down both sides of the road. This is not an isolated incident.
- at the consultation I asked about the hedge maintenance at the rear of the houses. We were assured that housing association would be maintaining it. It is a well-established hedge that cannot be done manually. Usually, a farmer would be employed with industrial equipment. The current plans indicate there is no room at the rear of the properties for access to the hedge and it appears that two easterly houses have their gardens right up to fence boundary. The burden of the hedge cutting should not be placed upon the New home occupiers.

In supporting the scheme the following comments were made:

- In order for communities such as Parracombe to thrive we need to enable local people young and old, families, and those on low incomes to remain in the village. Through housing needs survey and ongoing needs assessments there is a clearly identified need for housing in the village for people with local connections. There has been a great deal of work by the Parish Council and Parracombe Community Trust to consult with residents, listen to their views and mitigate concerns. A great deal of care and consideration with the development of this project has resulted in a quality design that I believe sits well in the landscape. Delivery of the project will ensure that we remain a diverse and vibrant community.
- There are some old and young families in Parracombe and nearby who for some reason or another cannot get on to the housing ladder, and this is a good way to have a home in the area they want to live, at a reasonable cost.

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- With ever increasing holiday and second homeowners occupying houses, this reduces the possibility of renting or buying for local young people.
- It is important that the freehold of these houses is held in trust by the community. Parracombe had a number of affordable houses until the political changes of the 1980s. These new houses must not be subject to the whim of politicians.
- I have the utmost faith in the Parks Authority ensuring concerns raised by residents regarding services and highway/conservation issues will be addressed.

Policy Context

Exmoor National Park Publication Local Plan 2011 – 2031 (Including Waste and Minerals)

GP1: General Policy: National Park Purposes and Sustainable Development

GP4: General Policy: The Efficient Use of Land and Buildings

GP5 Securing Planning Benefits – Planning Obligations

CE-S1 Landscape and Seascape Character

CE-D1 Protecting Exmoor's Landscapes and Seascapes

CE-S2: Protecting Exmoor's Dark Night Sky

CE-S3: Biodiversity and Green Infrastructure

CE-S6: Design and Sustainable Construction Principles

CC-S1 Climate Change Mitigation and Adaption

CC-S5 Low Carbon and Renewable Energy Development

HC-S1: Housing

HC-S2: A Balanced Local Housing Stock

HC-S3: Local Occupancy Criteria for Affordable Housing

HC-D3: New Build Dwellings in Settlements

CC-S6 – Waste Management

CC-S7 Pollution

CC-D5 – Sewerage Capacity and Sewage Disposal

RT-D12 – Public rights of way and access

AC-S1 - Sustainable Transport

AC-D2 – Traffic and Road Safety Consideration for Development

AC-S3 – Traffic Management and Parking

AC-D3 – Parking Provisions and Standards

The National Planning Policy Framework is also a material planning consideration.

Planning Considerations

The main material planning issues in relation to this application, are considered to be the principle of the development, the design, scale and materials and the impact on

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the character and appearance on the landscape, the impact on protected species and habitats, the impact on highway safety amongst other matters.

Principle of Development

The application site is located on the edge of the settlement of Paracombe. Policy GP1 states:

Opportunities must be taken to contribute to sustainable development of the area.

Particular attention should be paid to:...

- ensuring high quality design and the intensity of the use or activity is appropriate to the character and appearance of the National Park,
- provide for a size, type and tenure of housing to address local affordable needs, efficient use of land,
- conserve or enhance the impact of any development on the occupiers of neighbouring properties.

Policy GP3 Spatial Strategy sets out that development within Villages (including Parracombe) will contribute to and provide opportunities to address locally identified needs for housing. New build development for local need affordable housing will be acceptable in principle where it is well related to existing buildings in the settlement.

Policy HC-S1 sets out that the purpose of new housing will be to address the housing needs of local communities. In 2017 a Housing Needs Survey was undertaken for the Parishes of Parracombe, Kentisbury, Trentishoe and Martinhoe to establish housing need over the next 5 years. The Housing Needs Survey is a snapshot in time and many different factors can affect how needs can change over time. The survey resulted in an identified need at that time, for 5 affordable homes and 3 open market homes. The survey identified 3 households that qualified for affordable rent and 2 that may be able to afford a shared ownership property. The size of property required was 5 one- or two-bedroom homes for singles / couples.

HC-D3 (New Build Dwellings in Settlements) permits new build housing development in named settlements where the site is well related to existing buildings would conserve or enhance the traditional settlement pattern of the village. Furthermore, there is a proven local need for the dwellings within the parish which will meet an affordable local need, and the intended occupants meet the requirements of the local need occupancy criteria which will be secured in perpetuity through a planning obligation in accordance with HC-S3 Local Occupancy Criteria for Affordable Housing; and the dwellings will be affordable by size and type to local people and will remain so in perpetuity in accordance with HC-S2 A Balanced Local Housing Stock.

North Devon Housing Authority also stated that the Latest data from DHC in January 2023 shows those living in the parish in housing need as Parracombe (4), Kentisbury (4), Trentishoe (1) and Martinhoe (3). While the local connection is not confirmed it

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does show a need. Furthermore, this figure does not include the many households who do not register on DHC because they don't think a rural scheme will materialise (and this often increases as more locals see work on the ground) and also does not include people who live elsewhere but hold a local connection to the parishes and may wish to return.

Where permission is granted, a condition will be attached removing permitted development rights in respect of extensions in accordance with HC-S2 A Balanced Local Housing Stock.

Subject to securing the necessary planning obligation, and an assessment against the relevant policies within the plan it is considered that the proposal complies with Policies, HC-S1, HC-S2 and HC-D6 of the Local Plan.

Background

This proposal has been subject to considerable pre-application discussions and community involvement. In 2017 the process began to identify a potential site to provide Affordable housing for the community. In September 2017 Officers of the National Park engaged with the local community to evaluate potential sites around the existing settlement.

In September 2021 a question-and-answer session was held to introduce the community to the team and answer questions. This event was attended by approximately 40 people and the majority of residents were supportive of the proposal to build new affordable homes for local people.

In September 2022 a formal consultation event was held to receive feedback to the proposals from all local people. The presentation included exhibition boards, a physical model and the opportunity to speak directly with members of the project team. Of the 42 people who completed and returned forms, all 42 supported the aims, designs and location of the proposed homes. Of those 42, 13 people added comments either emphasising their support or highlighting concerns.

Impact on Landscape

Policy CE-D1 & CE-S1 advises that development will be permitted where it can be demonstrated that it is compatible with the conservation and enhancement of Exmoor's landscape.

The site falls within National Character Area 145 Exmoor and is described as follows:

Exmoor National Character Area (NCA) is predominantly a landscape of upland plateaux of Devonian sandstones and slates terminating in the north at the Bristol Channel with a spectacular cliff coastline. It lies across the counties of Devon and Somerset. The Devonian geological time period was first described and recorded in

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association with this area. To the west the area terminates at Barnstaple / Bideford Bay and the Taw and Torridge Estuary and to the east at the Vale of Taunton Deane. The Exmoor area contains sparse settlement with centres at Braunton, Ilfracombe, Lynton and the western edges of Minehead, all associated with the coast, and inland at Barnstaple, Dunster, Dulverton and Bampton.

The application site also falls the Northern section (F1) of the Enclosed Farmed Hills with Commons Landscape Character Area. This area is defined as having:

'Its northern boundary met by the various Landscape Character Area's of the High Coastal Heaths and High Wooded Coast, Combes and Cleaves landscape type. The wooded combes extend south into the landscape, breaking up the hills, and the densely wooded steep valley sides provide dramatic and unexpected views. Although the vast majority of field boundaries are defined by beech hedge banks, there are some localised areas of stone wall boundaries that add localised character variation, e.g. at Trentishoe and Countisbury Common. Farms nestle in sheltered valleys, and the ancient settlements of Martinhoe, Parracombe and Trentishoe cluster around their square-towered churches. Most of the roads are steep, narrow lanes running between the patchwork of fields, but the A39 passes through this landscape from Porlock to Blackmoor Gate and has a localised influence on noise levels and tranquility. This LCA also contains the line of the former narrow-gauge railway that connected Barnstaple to Lynton.'

The application site is located to the north of the village. The surrounding topography climbs relatively steeply in a northern direction giving the application site an elevated vantage point, albeit the site being located in the southern lowest point. The site is defined by hedgerows to the south and along the boundary with Parracombe Lane. Views of the site are mostly localised with some views from other elevated positions as one arrives and leaves the village.

The application has been submitted with a Landscape and Visual Impact assessment provides consideration of the local landscape character, an assessment of the local landscape character and considers the visual impact of the development from a number of public vantage points. In considering the proposal the report concludes that the site possesses a level of containment provided by the immediate topography and vegetation, with views experienced by only a limited number of visual receptors. There will be close range views of the upper parts of buildings for people travelling along Parracombe Lane. There is also the potential for distant glimpsed views of the site for a small number of highways and other public vantage points to the south, east and west of the site. Proposed mitigation measures comprising native hedge planting and native tree planting on the field boundaries and the creation of scattered copse planting in the area of built development. The report concluding that the residual landscape and visual effects of no more than Minor Adverse in the long-term.

The Authority's Future Landscape Officer commented that there appears to be very little space for the patios between the two houses parallel to Parracombe Lane and

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the existing hedgerow and therefore how the hedgerow will be protected and maintained into the future will be important. Concern has been raised that the hedgerow could be at risk of being cut back hard to make more room and make the space usable as a patio. Officers consider that a condition can be applied to any planning permission seeking a management plan to ensure care is taken to ensure the protection of the hedgerow in the long term. A wider paved area to each side of these properties would provide an alternative, more useable patio space with just a path leading to each rear storage shed.

The Future Landscapes Officer confirmed that no landscape proposals plan has been submitted. Detailed information on the proposed planting will be required for trees, hedgerows and grass / wildflower mixes, to include ground preparation, species, mixes, density and sizes as well as maintenance within the amenity spaces, boundaries and swale/wetland. Detail on the types of boundaries to rear private gardens will also be required and should reflect the character of the rural setting. This can be secured by planning condition.

Furthermore, the proposed material to the parking spaces is permeable, cellular grasscrete. Permeable block paving to the access road would further reduce runoff and reliance on the swale. This could be applied to areas indicated as non-permeable block paving, or at least the block paved areas leading from the main/field access. This would reduce the capacity requirement for the swale and enable it to become a more usable amenity space and reduce the likelihood of the swale having to be fenced off for safety reasons.

Whilst the site is not in the core or buffer zone, it is within the wider Exmoor National Park Dark Sky Reserve and close to the buffer zone. All proposed external lighting should comply with requirements to minimise obtrusive light, including shielded fittings, timers and sensors. Internal light spill from roof lights should also be considered and mitigated as far as possible.

Officers would concur with the above observations and conclusions in the LVIA. Furthermore, and particularly from Parracombe Lane, the development when arriving to Parracombe will be read very much as part of the village given the site relationship with the village shop and other buildings. The use of materials has also taken reference from the surrounding building which will further aid the integration of the development into the surrounding landscape.

Overall, the development is considered, through the sensitive siting of the development and materials to conserve the landscape character and comply with policies CE-S1 & CE-D1.

Design, Massing & Materials

Policy CE-S6 requires development proposals to deliver high quality sustainable designs that positively contribute to the setting; use materials and design elements

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that complement the local context; reinforces landscape character and the positive arrangement of landscape features; have regard to health and well-being; improve safety, inclusivity and accessibility for those who live, work and visit there; would not detrimentally affect the amenities of surrounding properties and occupiers including overlooking, loss of daylight, overbearing appearance; or have any other adverse environmental impacts.

The proposed development has been designed in the form of two, two storey blocks. One being semi-detached dwellings, and the more significant block offering a terrace of four dwellings. The layout has largely been influenced by the surrounding landscape and its location. The semi-detached dwellings to the east of the site are set back from Parracombe Lane behind the existing hedgerow allowing for amenity space. This building addresses Parracombe Lane with a low eaves. The building to the south has been orientated to address Parracombe Lane with a gable rather than front on to help reduce the impact of this longer building in near views from the Lane and in the Key View from Church Lane identified in the Conservation area appraisal. This building orientates a low eaves to the south to reduce visual impact in long views across the valley. The site is to the edge of the settlement and therefore the design has been influenced by a farmstead typology. This is influenced by the siting of the buildings, the courtyard style parking area and the choice of materials.

Vehicular access is proposed via Parracombe Lane utilising an existing agricultural vehicle access. This will need to be widened to meet the Highway authority requirements with the removal of a small section of hedgerow. Pedestrian access is also proposed off Parracombe Lane to the south-east corner of the site.

The courtyard space in the centre of the site will be used by all residents for vehicle parking. It is proposed that this area will be naturally landscaped around the proposed parking bays in an attempt to break up the hard landscaping necessary. The landscape around the perimeter is proposed to include new hedgerows which will be planted and managed in order to provide a natural variety in height. A planted wetland garden is proposed for the lowest part of the site in the south east corner and this will be available for all residents to use as amenity space. The management of these spaces will be crucial to their success.

Policy HC-D4 Accessibility and Adaptable Housing for Exmoor's Communities sets out that accessible and adaptable homes for older people and/or other vulnerable members of the community who have established local connection, and require homes which meet their need over their lifetime will be encouraged where proposals meet the requirements of the Local Plan.

The application confirms that the dwellings will be delivered to meet the M(4)2 standard for accessible and adaptable dwellings in accordance with building regulations and the above mentioned policy. An accessible pedestrian route is proposed from the parking area to each front door and from the site to Parracombe Lane. This would be in line with policy HC-D4 of the Local Plan.

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Furthermore, CE-S2 clearly states that development that involves external lighting outside of the Dark Sky Reserved 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.

level bollards are proposed for external lighting at the front of the homes for safety. The detail of the lighting strategy will be designed at a later date, but the intention will be to limit upward light spill and minimise impact on wildlife. The use of timers and dusk till dawn sensors will ensure that the lighting is only used when necessary. The application also seeks to avoid street lamps in this rural location and recognise that this is likely to be at odds with the highways design guide for adoptable roads within the site. Officers agree that external lighting should be kept to a minimum and only where necessary to meet the needs of a community or for safety or security reasons. The proposal appears to keep lighting to a minimum, focusing its use on the needs of future residents. Therefore, subject to appropriate conditions it is considered the proposal complies with CE-S2

Overall, the design of the development appears to be of a high quality and has been carefully designed to take into account the sites location and relationship with the existing settlement. However, the proposal looks to incorporate aluminium clad windows. This introduces a material that is not considered traditional and poses a conflict with the aims of the Local Plan.

Paragraph 4.152 states: *The use of traditional, natural materials is critical in ensuring that the appearance of new developments conserves and enhances the quality and character of the built environment. The National Park Authority will therefore expect the use of traditional vernacular materials...'*

Furthermore, paragraph 4.157 it further states: *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 both a traditional and sustainable material which has the potential to be grown locally.*

In response to the Local Plan the applicant has stated in their Design and Access Statement:

The proposed windows are a high-performance timber aluminium composite. This type of window is made of timber but has a thin metal capping on the external face. This will give a contemporary appearance to the homes that is in keeping with the contemporary design as a whole. We have proposed a natural anodized finish to

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the aluminium to resemble the appearance of raw metal. This has been chosen for its honesty of expression and reflects the simple and direct approach to detailing that is typical of rural vernacular buildings.

Officers have given careful consideration to this and agree that the design of the development has sought to appear contemporary, but this has largely been done through the use of traditional materials which seek to complement the surrounding vernacular styles. The use of aluminium would be at odds with this. Its use would offer a mechanical sheen and would lack the detail and refinement of a good quality timber window. Therefore, should the proposal be considered in all other regards it is recommended that a condition be included with any approval to stipulate the use of timber windows with details being submitted prior to their use.

Subject to the inclusion of the condition discussed above the proposed development is considered to represent high quality design and accord with policy CE-S6 and the local plan as a whole.

Ecology

Policy CE-S3 (Biodiversity and Green Infrastructure) of the Local Plan relates to biodiversity and green infrastructure and states that the conservation and enhancement of wildlife, habitats, and sites of geological interest within the National Park will be given great weight.

The application was submitted with a Preliminary Ecological Appraisal (PEA) which recommended that follow up surveys are carried out including both bat and dormouse surveys. These were not submitted with the application and following a discussion with the agent a revised Preliminary Ecological Appraisal has been submitted reducing the survey area to the redline area. The revised PEA concluded the site was considered to be of relatively low ecological interest, with minimal adverse impacts predicted on important ecological features.

Proposed avoidance measures and careful timing of works have been incorporated into the design to eliminate impacts protected and notable species and habitat creation has been included to compensate for habitat loss.

The report confirms that provided the avoidance and mitigation measures are carried out, the proposal is considered unlikely to have significant adverse effects on ecological features. A number of enhancement measures have been recommended with the aim of providing a net biodiversity gain, contributing to the aims of National Planning Policy Framework and local policy.

Furthermore, the report sets out that the site baseline comprises 0.58 habitat units (hu) and 1.12 hedgerow/linear units (lu).

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The proposed development will comprise 0.64 hu and 1.84 hedgerow/lu, resulting in a net gain in 0.06 habitat units (11.23%) and a net gain in hedgerow units of +0.72 (64.72%).

New wildflower grassland, wetland garden, short grass lawn, scattered native trees, private gardens, grasscrete parking bays and native species-rich hedgerows will be planted to compensate for the loss of modified grassland on site.

The Authority's Wildlife Officer has reviewed the report and concluded that the revised PEA was acceptable subject to appropriate avoidance, mitigation and compensation measures recommended in the report which included sensitive methods and timing of works, pre-works checks, and a watching brief as detailed in Section 5 of the report being secured by way of a planning conditions. The Wildlife Officer stated that these recommendations must be strictly adhered to, and evidence of their implementation provided. Furthermore, a Construction Management Plan should be included with any approval.

Officers agree with the conclusions of the reports and the comments from the Wildlife officer. Therefore, subject to the conditions suggested in this report officers conclude that the proposal is in accordance with policy CE-S3 of the Exmoor Local Plan.

Impact upon the Conservation Area and Historic Environment

Policy CE-S4 (Cultural Heritage and Historic Environment) of the Local Plan advises that, among other things, Exmoor National Park's local distinctiveness, cultural heritage, and historic environment, will be conserved and enhanced to ensure that present and future generations can increase their knowledge, awareness and enjoyment of these special qualities. The Policy advises that development should make a positive contribution to the local distinctiveness of the historic environment and ensure that the character, special interest, integrity, and significance of any affected heritage asset and its setting is conserved and enhanced. Where development proposals are likely to cause significant harm to, or loss of, designated heritage assets or assets of national significance, permission should be refused in accordance with CE-S4.

Policy CE-D3 Conserving Heritage Assets states that development proposal affecting conservation areas should preserve or enhance the character and appearance of the area. The policy also required high quality design and incorporate materials that reflect the scale, architectural quality and detail of the area.

Paragraph 200 of the NPPF (National Planning Policy Framework) states that: Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

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Paragraph 202 goes on to state that: Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

The application site falls outside, but adjoins, Parracombe Conservation Area. The appraisal of the conservation area sets out that 'much of the special interest of Parracombe is in the historic pattern of settlement, which developed into four geographically discrete hamlets, within an open pastoral landscape in the valley of the River Heddon. All of the hamlets have early origins. The architectural character of the village is predominantly 19th century although many of the buildings have earlier origins. Buildings tend to be plain with little in the way of architectural detailing although here are a few notable exceptions.'

The Historic Buildings Officer has commented on the application and in raising no objection to the proposal stated that:

The LVA assesses the potential impact on the landscape character and visual amenity. As the Future Landscapes Officer has remarked in her response, it demonstrates that the development would be visually well contained in longer distance views and become absorbed into the settlement pattern and wider landscape setting.'

The Historic Buildings Officer has concluded that due to the contained nature of the development that the development would have less than substantial harm to the setting of the conservation area.

In total there are 19 listed buildings. Seven of the list entries are church yard structures in the church yard of St Petrocks Church (Grade I). The nearest Listed Building to the site, is Heddon Hall and the associated Coach House. These are located to the east of the application. However, due to the topography of the surrounding land it is not possible to view both sites and the application site is not considered to have a significant impact upon the setting of these Listed Buildings. St Petrock Church and other associated structures are some considerable distance from the site further east. While views may be achieved, officers agree with the Historic Buildings Officer that these would become absorbed into the settlement pattern and wider landscape setting.

The sensitive design and careful choice of materials will further assist in limiting the impact of the development assimilating the proposals into the village pattern. Officers concur with the views of the Historic Buildings Officer that the public benefit the scheme provides, by-way of affordable housing to the area, offsets the harm caused to the designated heritage assets in this instance.

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Therefore, subject to conditions regarding materials officers consider the development to have less than substantial harm and overall is considered to comply with policies CE-S4 & CE-D3 of the Local Plan.

Highway, Access & Parking

Policy AC-S2 (Transport Infrastructure) looks to encourage sustainable modes of transport and to ensure that proposals which include new access roads and parking provision is designed to reflect the character of the area. The policy seeks to retain the rural character of the highway network, incorporate wildlife enhancements, minimising lighting and take account of road safety interests.

Policy AC-D1 (Transport and Accessibility requirements for Development) looks to ensure all opportunities have been taken to encourage safe and sustainable modes of transport and ensuring that design and details of highway works contribute to the conservation or enhancement of the area.

Policy AC-D2 (Traffic and Road Safety considerations for Development) seeks to ensure consideration is given to the capacity of the surrounding highway network.

Policy AC-D3 (Parking provision and Standards) clearly sets out the parking standards for new development. This policy also encourages cycle provision where considered appropriate.

The proposed development will require a new road access to be formed off Parracombe Lane, which utilises an existing agricultural access. The proposals require adjustment to the existing ground levels and hedge to create the site entrance. A speed survey has been carried out on Parracombe lane and the results provided to justify the proposed visibility splay at the site entrance. A new footpath alongside the vehicle entrance will provide pedestrian access from Parracombe Lane. The application states that it was not uncommon for pedestrians to walk on the lane and a popular circular walking route passes the proposed site entrance. Officers would agree that walkers regularly walk down Parracombe lane. The proposed pedestrian access would however provide an accessible and sensible path to access the highway. Officers also consider that the introduction of any formal footpath along Parracombe Lane would significantly alter the character and appearance of the lane which would be undesirable.

Also included in the application is a new agricultural access from the new access road into the remaining field. A hard-standing will be provided on the field side of the gate to assist with the removal of mud from farm vehicles.

The nearest bus stops to the proposed development are located on Ley's Lane in the centre of Parracombe Village approximately 500m from the site entrance. It is understood there may be plans for an additional stop to be added at the new village

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stores on Parracombe Lane, however, no formal confirmation of this has been received.

Parking has been allocated at 2 bays per dwelling, parking for 2 motorcycles and 1 visitor bay is proposed. Access to electric vehicle charging is proposed for all homes, and this would be secured via a planning condition. The access road and unallocated parking may also be used for drop-off & deliveries and for emergency vehicle access. Cycle parking is proposed to be provided in free-standing individual storage sheds at a rate of 1 space per bedroom. Bin storage locations have been identified. Where these are located within the curtilage of a dwelling these are provided as a hard standing area and are open to the air. Free standing timber refuse storage is provided for the south building where the travel distance from the rear garden to a suitable collection point is likely to be excessive. Each home to have 2 x recycling boxes, 2 x reusable bags, 1 x food bin and 1 x wheeled bin for refuse. This is considered to comply with the relevant policies and guidance and accords with the Local Plan policies.

Overall, it is considered that the proposal would comply with conditions AC-S1, AC-D1, AC-D2 & AC-D3 of the Exmoor Local Plan, subject to the relevant planning conditions.

Flooding and Drainage

CC-D1 states that proposals will be permitted where they are consistent with the sequential tests and where it has been demonstrated that the site has little or no risk of flooding, with preference given to sites being outside areas of higher risk of flooding. Where appropriate the policy requires a site specific Flood Risk Assessment.

The application has been submitted with a Flood Risk Assessment and drainage Strategy. The Assessment identified that the site is designated by the EA flood map for planning as being located in Flood Zone 1, with a likelihood of flooding less than 0.1% each year. The proposed development adds 2000m² of impermeable area to the site. It is proposed to discharge surface water from all new impermeable areas to the ground via infiltration in-line with SUDs guidance. The site does not benefit from flood defences. The assessment further confirms there are no known historical records showing the site to be at risk from groundwater flooding. The report concludes that the development is appropriate in line with the latest government guidance as it does not increase the risk of flooding to the site or the surrounding properties.

CC-D5 sets out that development proposals which require new or extended sewerage infrastructure will be permitted where it can be demonstrated that the facility will pose no unacceptable harm to public health, amenity or environmental quality, subject to a number of criteria being satisfied.

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The Flood Risk Assessment and Drainage Strategy document sets out that there is an existing foul system located 56m to the south of the site within Parracombe Lane. It is proposed to lay a new adoptable foul system to run from the site entrance to the existing system. This system would be offered for adoption by South West Water under an S104 application.

South West Water have commented raised no objection to the scheme being managed in accordance with the submitted drainage strategy. They confirm that that South West Water are able to provide water to site and connection to the nearby foul sewerage is also possible. They further confirm that having assessed the surface water disposal for the site that the details were acceptable and met the Run-off Destination Hierarchy.

Overall officers consider the details submitted to satisfactory and subject to appropriate conditions will comply with Exmoor Local Plan.

Climate Emergency/Sustainability

In May 2019 the UK government declared a climate emergency, Exmoor National Park followed this by declaring a Climate Emergency in October 2019. To help meet this challenge the Local plan includes policies which seek to influence, contribute and challenge development to help meet the Climate Emergency. GP1 'Achieving National Park Purposes and Sustainable Development' Sets out that the need to consider future generations, through sustainability and resilience to climate change and adapting to and mitigating the impacts of climate change. Policy CC-S1 'Climate Change Mitigation and Adaption' states that climate change mitigation will be encouraged, development which reduces demand for energy, using small scale low carbon and renewable energy, looks to situate development which avoids sites that would put wildlife at risk together with measures which avoids the risk of flooding. Furthermore, Policy CC-S5 'Low Carbon and Renewable Energy Development' seeks to support small scale renewable energy schemes that assist in contributing towards reducing greenhouse gas emissions and moving towards a carbon neutral National Park and policy CE-S6 'Design and Sustainable Construction Principles' seeks to incorporate sustainable construction methods which future proof against climate change impacts, including flood risk.

Paragraph 152 of the National Planning Policy Framework requires that "the planning system should support the transition to a low carbon future in a changing climate taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

The applicant's Design and Access statement sets out that that the proposal aims to implement a fabric first approach to sustainability. We are aiming for a higher

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performance than the current building regulations require to provide a high level of comfort, reduce energy consumption in the home for heating and reduce fuel bills. The key to this approach is to identify aspects of heat energy balance that the building design can influence these include:

- Building shape / mass – more compact massing
- Glazing – double glazed windows
- Insulation – high levels of insulation
- Thermal bridging – remove thermal bridging
- Airtightness – airtight barrier
- Ventilation – natural ventilation or MVHR

Additional sustainability measures include the potential use of air source heat pumps (gas boilers are not currently proposed); rainwater harvesting for irrigation through water butts; photovoltaic roof array for on-site electricity generation and to meet renewable energy targets, access to electric car charging for every home. The proposals include measures to provide new hedge planting, tree planting, wild-flower planting and wetland mix planting which will all contribute towards improving wildlife habitats and improve biodiversity on the site.

The proposal also seeks to the achieve air tightness and U Value targets throughout the development. These targets seek to meet the requirements set out in the relevant parts of the Building Regulation details.

There would be an impact on the climate from the construction process and the sourcing of construction materials and the use of the properties. However, the development is of a modest scale, looks to use traditional and sustainable materials. Furthermore, the use of modern construction principles will ensure that the dwellings are as energy efficient as possible. Therefore, while the development will have an adverse impact, particularly during the construction phase, overall, the development is considered to have an acceptable impact.

Human Rights

The provisions of the Human Rights Act 1998 and Equality Act 2010 have been taken into account in reaching the recommendation contained in this report.

Conclusion

The erection of 6 local need affordable dwellings is considered to comply with the Local Plan. The scheme would see much needed affordable dwellings provided in Parracombe to support a recognised local need. The proposed development would see some harm to the character and appearance of the immediate landscape and historic environment, but this is considered to be mitigated by the overall high quality design of the development together with the use of traditional materials. Further

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mitigation will be secured through a condition requested further details of a landscape scheme.

There will also be an impact upon the surrounding ecology, however, this would be mitigated through the use of conditions to secure the mitigation and enhancement measures that proposed in the Preliminary Ecological Assessment. Furthermore, while not currently requested through government legislation the development would see a Biodiversity Net gain of 0.06 habitat units (11.23%) and a net gain in hedgerow units of +0.72 (64.72%). This further weighs in favour of approving the scheme.

The scheme has also sought to use sustainable construction material and methods which will limit the impact the development will have on climate change.

Overall, the proposal is considered to offer a high quality, sustainable development which meets the requirements of the local plan and therefore subject to appropriate conditions and the applicant signing a S106 agreement the officer recommendation is one of approval.

Recommendation

1. The development to which this permission relates must be begun not later than the expiration of three years beginning with the date on which this permission is granted.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2. The development hereby approved shall be carried out strictly in accordance with drawing numbers 2008(00)01 P03 (Location Plan), 2008(00)151 P01, 2008(00)152 P01, 2008(00)170, 5021sk0005 Rev E, 5021sk0006 Rev C, 5021sk0008 Rev B, 2008sk0007 Rev C, 2008(00)050 P03, 2008(00)350 P01, 2008(00)351 P01, 2008(00)352 P02, 2008(00)360 P01, 2008(00)370 P01 & 2008(00)150 P01 date stamped by the Local Planning Authority on 23 February 2023 & 30 August 2023.

Reason: To ensure a satisfactory standard of development in the interests of amenity.

3. A watching brief shall be maintained during any groundworks at the site. Should any suspected contamination of ground or groundwater be encountered, the Local Planning Authority shall be contacted immediately. Site activities within that sub-phase or part thereof shall be temporarily suspended until such time as a procedure for addressing the contamination is agreed upon with the Local Planning Authority or other regulating bodies.

Reason: To ensure that any contamination exposed during development is remediated in accordance with the National Planning Policy Framework

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4. Prior to the commencement of development, including any site clearance, groundworks or construction (save such preliminary or minor works that the Local Planning Authority may agree in writing), a Construction Management Plan (CMP) to manage the impacts of construction during the life of the works shall be submitted in writing for the approval of the Local Planning Authority. For the avoidance of doubt and where relevant, the CMP shall include:-

- a) details of control measures for addressing fugitive dust from earthworks and construction activities; dust suppression;
- b) a noise control plan which details hours of operation and proposed control measures;
- c) specified parking for vehicles associated with the development works and the provision made for access thereto;
- d) the times within which traffic can enter and leave the site;
- e) details of measures to prevent mud contaminating public footpaths and roads;
- f) details of arrangements for materials deliveries, storage and waste materials removals;
- g) a point of contact (such as a Construction Liaison Officer/site manager) and details of how any complaints will be addressed.

The details so approved and any subsequent amendments as shall be agreed in writing by the Local Planning Authority shall be complied with in full and be monitored by the applicants to ensure continuing compliance throughout the development.

Reason: To minimise the impact of the works during the construction of the development in the interests of highway safety and to safeguard the amenities of local residents from potential impacts whilst site clearance, groundworks and construction is underway.

5. During the construction phase no machinery shall be operated, no process shall be carried out and no deliveries taken at or dispatched from the site outside the following times:

- a) Monday - Friday 08.00 - 18.00,
- b) Saturday 08.00 - 13.00
- c) nor at any time on Sunday, Bank or Public holidays.

Reason: To protect the amenity of local residents

6. Notwithstanding the provisions of the Town & Country Planning (General Permitted Development) Order 2015 (or any order revoking and re-enacting those Orders with or without modification), no external lighting shall be installed on the application building unless details have first been submitted to and approved in writing by the Local Planning Authority. The external lighting shall thereafter be installed and operated fully in accordance with the approved scheme.

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Reason: In the interests of conserving the designated heritage asset and protecting wildlife interests, visual amenity and Exmoor's dark night sky.

7. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any Order revoking and re-enacting that Order with or without modification), express planning permission shall be obtained for any development within Classes A – F of Part 1 & Class A of Part 2 of Schedule 2 of the Order.

Reason: To control any subsequent enlargements in the interests of the visual and residential amenities of the locality and in the interests of the affordability of the dwellings and the local housing stock in accordance with percentage figures set out under Policy HC-D15 and construction principles of CE-S6 of the Exmoor National Park Local Plan 2011-2031.

8. Prior to first occupation of the development hereby permitted, access to covered cycle parking, numbers and spaces to be fully in accordance with a detailed scheme to be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the development provides adequate storage for bicycles and to encourage sustainable forms of transport.

9. Prior to any development extended beyond slab level, a full details of all landscaping works, including all soft and hard landscaping shall be submitted to and approved in writing by the Local Planning Authority. The landscaping scheme shall include details of the following:

- all existing trees and hedgerows on site (including details of location, canopy spread, species and proposed pruning/felling and changes in ground levels);
- a plan showing the layout of proposed tree, hedge, shrub planting as well as grassed areas;
- a proposed planting schedule including details detailing the disposition of planting, cross referenced to a schedule listing the species, size and number and densities;
- a written specification setting out cultivation and other operations associated with plant and grass establishment.

Details of all final finishes to the hard surfaces throughout the site.

All planting and seeding/ turfing shall be carried out in accordance with the approved details in the first planting and seeding/ turfing seasons following the completion or first occupation of the development, whichever is the sooner.

If within a period of five years from the date of the planting of any tree planted pursuant to this condition that tree, or any tree planted in replacement for it is removed, uprooted or destroyed or dies, or becomes, seriously damaged or defective, another tree of the same species and size as that originally planted shall be planted at

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the same place, unless the Local Planning Authority gives its written approval to any variation.

Reason: To ensure the environment of the development is improved and enhanced in accordance with Policy CE-S1 & CE-S5 of the Exmoor Local Plan.

10. Prior to first occupation of any of the dwellings hereby permitted, a Landscaping and Public Realm Management and Maintenance Plan setting out long term design objectives, management responsibilities and maintenance schedules for all residents and visitors parking spaces, vehicular turning areas, footpaths, drainage facilities, bin collection areas, landscape and communal spaces, indicated as public realm areas on the approved drawing no. 2008(00)050 P03, but excluding small, privately owned domestic gardens, shall be submitted to and approved in writing by the Local Planning Authority.

The Landscaping Management and Maintenance Plan shall include:

(a) Soft and hard landscape maintenance details, including the frequency of site visits and timings of general operations, such as plant inspections, weed control, watering, fertiliser application, mulching, grass cutting, etc;

(b) a management and monitoring plan, to include details of how the boundaries and hedgerows and boundary trees to be retained and enhanced would be cared for during and after the implementation of the development hereby approved;

(c) schedules for the repair or, if necessary, replacement of any approved hard surfacing materials forming access routes, footpaths, parking and turning areas, bin collection areas and drainage facilities;

(d) name, address and contact details of any Management Company or similar set up to administer such management responsibilities and maintenance schedules.

11. The development shall be implemented in full accordance with the requirements of the approved Landscaping and Maintenance Management Plan, or any variation so approved in writing by the Local Planning Authority, and the details within the Landscaping Management & Maintenance Plan shall be adhered to in perpetuity thereafter.

Reason: To ensure the provision, establishment, management and maintenance of residents and visitors parking spaces, vehicular turning areas, footpaths, drainage facilities and landscaped and communal spaces in order to ensure that the character and appearance of the area are suitably protected and to safeguard the setting of the nearby Conservation Area.

12. The proposed roads, including footpaths and turning spaces where applicable, shall be constructed in such a manner as to ensure that each dwelling before it is

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occupied shall be served by a properly consolidated and surfaced footpath and carriageway to at least base course level between the dwelling and existing highway.

Reason: To ensure that the development is constructed to suitable standard and meets the relevant highway standards in accordance with policy AC-D1 of the Exmoor Local Plan.

13. Prior to the installation of any photovoltaic panels on the roofs of the dwellings hereby permitted, details of the panels, together with the angle to the roof shall be submitted to and approved by the Local Planning Authority in writing. The works shall be carried out in accordance with the approved details.

Reason: To ensure the panels are in appropriate locations and angles in relation to the position of the sun and that they do not impact on the historic assets in the area.

14. Provision shall be made within the site for the disposal of surface water so as to prevent its discharge onto the highway, details of which shall have been submitted to and approved in writing by the Local Planning Authority. Such provision shall be implemented prior to the occupation of any of the dwellings and maintained thereafter at all times.

Reason: To ensure that the development is properly drained, avoiding flood risk and pollution in accordance with Policies CC-S6 & CC-D5 of the Exmoor Local Plan.

15. Prior to its installation, details of the boundary treatments to be installed around the periphery of the developments shall be submitted to and approved in writing by the Local Planning Authority. The boundary treatments shall be installed in accordance with the agreed details.

Reason: In the interests of visual amenity and neighbour amenity.

16. During the construction phase the applicant shall ensure that all vehicles leaving the site are in such condition as not to emit dust or deposit mud, slurry or other debris on the highway. In particular (but without prejudice to the foregoing), efficient means shall be installed, maintained and employed for cleaning the wheels of all lorries leaving the site, details of which shall have been agreed in advance in writing by the Local Planning Authority and fully implemented prior to commencement and thereafter maintained until the construction phase of the site discontinues.

Reason: To protect users of the highway network from the unreasonable effect of mud and dust being spread on the highway and in the interests of highway safety, in accordance with policies AC-D2 & CE-S6 of the Exmoor Local Plan.

17. Prior to first occupation of the development hereby permitted, access to electric vehicle charging points will need to be available to all residents. They shall be in

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accordance with a detailed scheme to be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the development provides adequate electric charging points throughout the development in accordance with policies CE-S6 & AC-S3 of the Exmoor Local Plan.

18. Prior to their installation details of the locations of rainwater goods, flues, ducts, vents and any other external attachments shall be submitted to and approved in writing by the Local Planning Authority. The works shall be carried out in accordance with the agreed details and in the agreed locations.

Reason: In the interests of visual amenity.

19. Notwithstanding the details submitted and prior to their use on site details of the proposed windows and doors shall be submitted to and approved in writing by the Local Planning Authority. All doors and windows shall only be constructed from timber and shall be retained as such thereafter.

Reason: In the interests of the satisfactory appearance of the development upon completion and to accord with policy CE-S6 of the Exmoor Local Plan.

20. Prior to their use on the site details of the slates to be used on the roofs of the dwellings and hung on the gable end to house 04 as shown on approved plan 2008(00)151 shall be submitted to and approved in writing by the Local Planning Authority. Once approved these details shall be implemented and thereafter retained.

Reason: In the interest of the character and appearance of the area.

21. The rooflights hereby approved shall be flush fitting to the roof slope and of conservation style.

Reason: In the interests of preserving the character and appearance of the building

22. No development shall take place until a detailed Construction Environment Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. This Plan shall include details of all permits, contingency plans and mitigation measures that shall be put in place to control the risk of pollution to air, soil and controlled waters, protect biodiversity and avoid, minimise and manage the productions of wastes with particular attention being paid to the constraints and risks of the site. The CEMP shall specifically include the following:

- a) Risk assessment of potentially damaging construction activities.
- b) Identification of "biodiversity protection zones".

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- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).
 - d) The location and timing of sensitive works to avoid harm to biodiversity features.
 - e) The times during construction when specialist ecologists need to be present on site to oversee works.
 - f) Responsible persons and lines of communication.
 - g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
 - h) Use of protective fences, exclusion barriers and warning signs.

Thereafter the development shall be carried out in accordance with the approved details and any subsequent amendments shall be agreed in writing with the Local Planning Authority.

Reason: In the interests of protected and priority species, and in accordance with Government policy and Exmoor National Park Local Plan 2011-2013: Policy CE-S3 Biodiversity and green infrastructure.

23. The development hereby approved shall be carried out in strict accordance with the avoidance, mitigation and compensation measures set out in section 5 of the Ecological Impact Assessment by GE Consulting, ref 1911-EclA-LH, dated 11 July 2023 unless otherwise agreed in writing by the local planning Authority.

Reason: In the interests of protected and priority species, and in accordance with Government policy and Exmoor National Park Local Plan 2011-2013: Policy CE-S3 Biodiversity and green infrastructure.

24. Prior to the construction of any dwellings above brick plinth height details of the design and location of the following wildlife enhancement shall be submitted to and approved in writing by the Local Planning Authority. Once approved details shall be implemented in strict accordance with these details and photographic evidence of their implementation provided to the Local Planning Authority before the occupation of the 6th dwelling.

Reason: In the interest of securing wildlife enhancement measures throughout the development.

Informatives

Positive and Proactive

This Authority has a pro-active approach to the delivery of development. Early preapplication engagement is always encouraged. In accordance with the requirements

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of Article 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015, in determining this application, Exmoor National Park Authority has endeavoured to work positively and proactively with the agent/applicant, in line with the National Planning Policy Framework, to ensure that all relevant planning considerations have been appropriately addressed to achieve a positive outcome.

Monitoring of Development

The applicant/developer is reminded that it is their responsibility to ensure that the requirements of each planning condition are met and that the works are undertaken in accordance with the approved plans. Any failure to meet the terms of a planning condition or work which does not accord with the approved plans leaves the applicant/developer liable to formal action being taken. The National Park Authority endeavours to monitor on site the compliance with conditions and building works. This has benefits for applicants and developers as well as the National Park. To assist with this monitoring of development the applicant/developer is requested to give at least fourteen days notice of the commencement of development to ensure that effective monitoring can be undertaken. The Planning Section can be contacted at Exmoor National Park Authority, Exmoor House, Dulverton, Somerset, TA22 9HL or by telephone on 01398 323665 or by email plan@exmoor-nationalpark.gov.uk.

Conditions and Informatives and the submission of further details.

Please check all the conditions and informatives attached to this Decision Notice. If there are any conditions which require submission of details and/or samples prior to work commencing on site it is vital that these are submitted and agreed in writing by the Local Planning Authority before work starts. Given the High Court's interpretation of the Planning Acts and their lawful implementation it is unlikely that the Local Planning Authority will be able to agree to a sample/details after the commencement of works if that sample/details should have been approved prior to commencement. If a sample/detail is not agreed as required prior to commencement and works have started then it is likely that this matter may only be able to be rectified by the submission of another application. To avoid delay, inconvenience and the need to submit a further application, please ensure that all appropriate details/samples are submitted and agreed at the specified time.

Please also note that due to other decisions of the High Court it is now not normally possible for the Local Planning Authority to agree to minor amendments to approved applications on an informal basis.

The Department of Communities and Local Government have introduced a process whereby it is now possible to apply for a non-material amendment to a permission.

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This can deal with changes to plans which do not fundamentally alter the form of permission but are a variation to the approval. The appropriate form is available by request at Exmoor House or by downloading from the National Park Authority web site. Applications can be made via the Planning Portal.

Please ensure that works comply with the approved plans so as to avoid the possibility that works are unauthorised and liable for enforcement action.

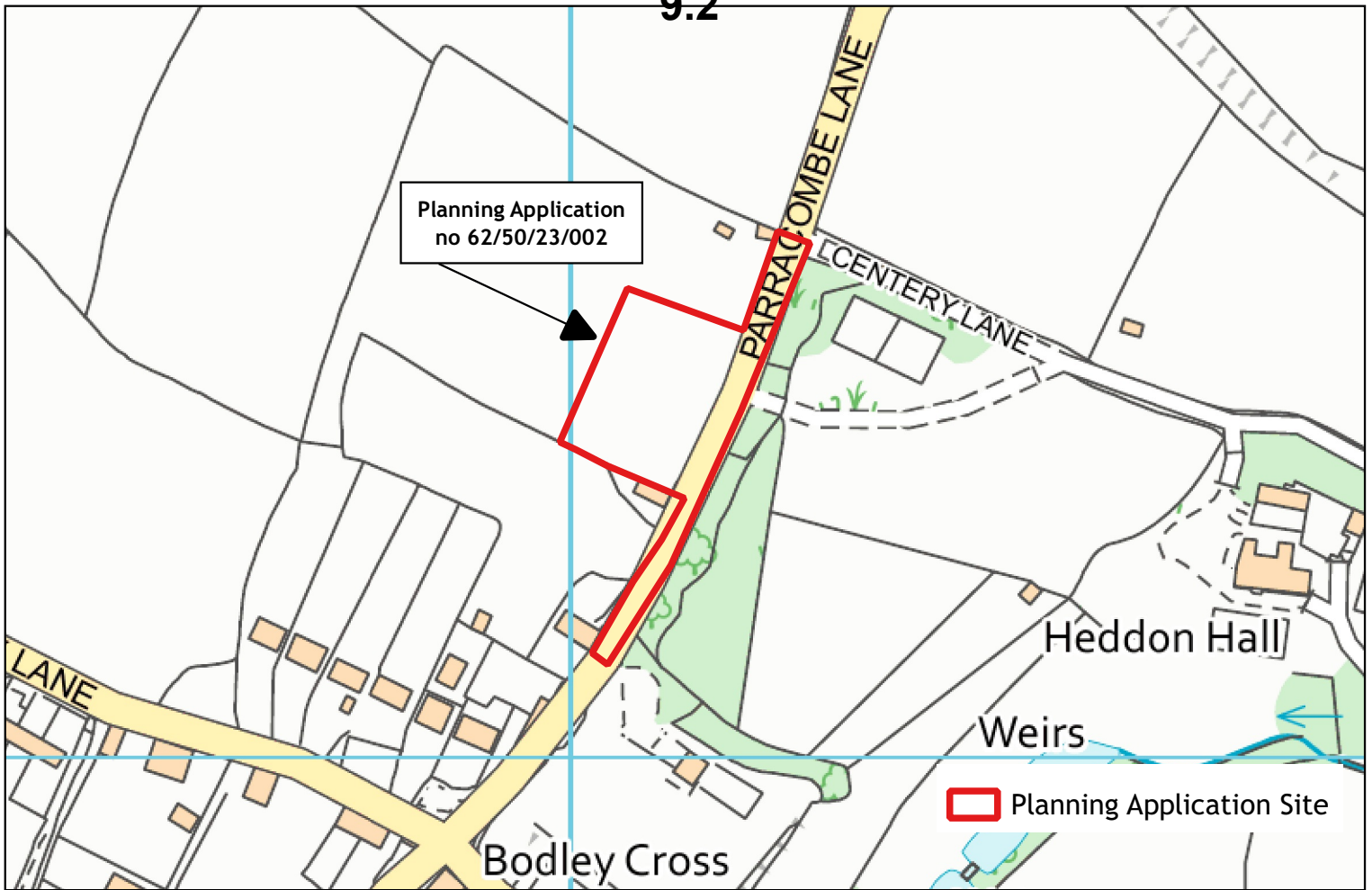
S106 Agreement

This decision notice should be read in conjunction with the terms of the S106 legal agreement dated the xxxxxxx. You are advised to satisfy yourself that you have all of the relevant paperwork.

Presence of Bats

The applicant is advised that under the Wildlife and Countryside Act 1981 it is an offence to kill or injure bats, to disturb them when roosting, to destroy roosts or to block entrances to roosts. It is strongly recommended that an investigation is undertaken by a licensed bat worker prior to any demolition or refurbishment works being carried out, to ensure that no bats are present in the existing buildings.

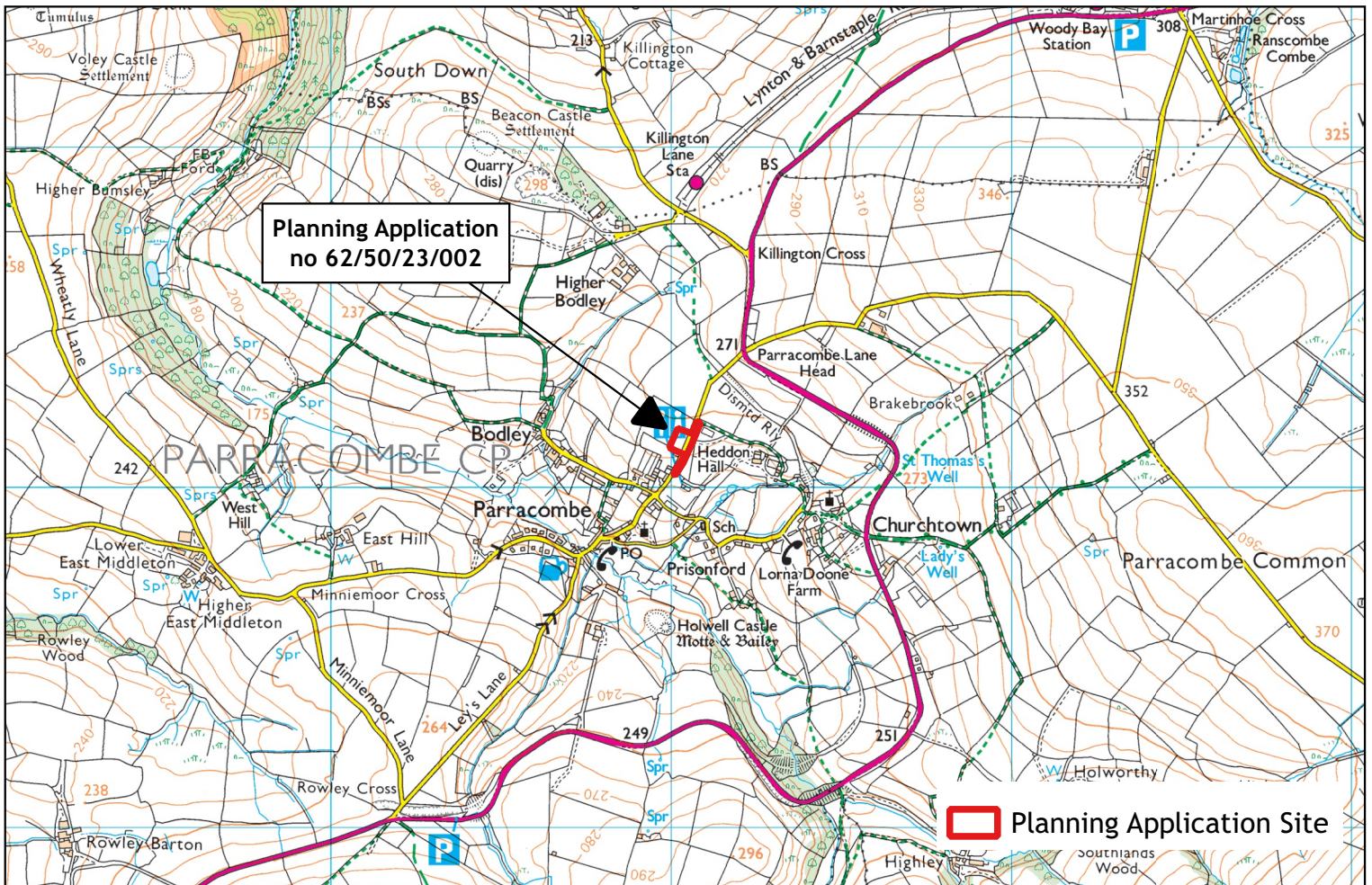
If evidence of the presence of bats is found, advice should be sought immediately from Natural England on steps which can be taken to avoid contravention of the above Act. Furthermore, if bats or a bat roost is identified a licence under the Conservation (Natural Habitats) Regulations 1994 is likely to be required before works can commence. The applicant is strongly advised to take specialist advice if bats or a bat roost may be present and that the contact for applying for a licence is the Licensing Officer, European Wildlife Division, Department of Environment Food and Rural Affairs, Room 1/08, Temple Quay House, 2 The Square, Temple Quay, Bristol, BS1 6EB (0117 372 8903).



Site Map

Scale 1:2,500

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Overview Map

Scale 1:20,000

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Application decisions delegated to the Chief Executive

Application Ref	Applicant & Location	Decision and Date
6/40/23/006	Mr P Ash - Proposed single storey extension. (Householder) - HOE FARM, WHEDDON CROSS, MINEHEAD, TA24 7EY	17-Aug-2023 Approved with Conditions
62/49/23/005	Mr P Stucley - Change of Use of land from Agriculture to Sui Generis (Public House) and proposed installation of 40no. ground mounted solar panels (Full) - POLTIMORE ARMS, YARDE DOWN, SOUTH MOLTON, EX36 3HA	18-Aug-2023 Approved with Conditions
62/41/23/020LB	Emerald Hotels - Listed building consent for the proposed replacement windows to the front elevation. (Listed Building Consent) - THE VALLEY OF ROCKS HOTEL, LEE ROAD, LYNTON, EX35 6HS	22-Aug-2023 Approved with Conditions
6/35/23/003	Mr M Weatherlake - Proposed single storey extension. Part retrospective. Resubmission of refused application 6/35/23/001. (Householder) - HIGHER COURT FARM, TREBOROUGH, WATCHET, TA23 0QW	23-Aug-2023 Approved with Conditions
62/50/23/013	Ms M Allen - Proposed extension of sand school for private use. (Full) - The Ark, PARRACOMBE, BARNSTAPLE, EX31 4RG	24-Aug-2023 Approved with Conditions
6/29/23/008	Mr N Smith - Lawful development certificate for existing shed (CLEUD) - JO-LEA, OLD LANE, PORLOCK, MINEHEAD, TA24 8EZ	31-Aug-2023 Approved
6/30/23/001DC	Mr & Mrs H Best-Shaw - Proposed discharge of conditions 11 (lighting), 15 (rainwater goods) & 18 (Ecology) and partial discharge of Condition 13 (Ecology) of approved application 6/30/22/002 (Discharge of Condition) - Frogwell Farm, SKILGATE, TAUNTON, Somerset, TA4 2DP	31-Aug-2023 Approved
6/3/23/006	Ms J. Marchant - The proposed erection of a garden shed and the retrospective extension of the curtilage of Dye House. (Full) - Dye House, BURY, DULVERTON, Somerset, TA22 9ND	31-Aug-2023 Approved with Conditions
WTCA 23/09	Mrs J Duncan - Works to Trees in a Conservation Area: Various crown lifting, pruning back or crown reduction works to a number of semi-mature trees	01-Sep-2023 Approved

Application decisions delegated to the Chief Executive

Application Ref	Applicant & Location	Decision and Date
	and large shrubs within or overhanging the garden of the property, as set out in detail in the description of works section on the application form. (WTCA) - THE WALLED GARDEN, LUCCOMBE, MINEHEAD, TA24 8TE	
WTCA 23/08	Mr H Harrison - Work to trees in a conservation area: Crown lift of Common Beech to 2.5m and crown reduce by removing 2-3m branches. (WTCA) - CHURCH COTTAGE, PARRACOMBE, BARNSTAPLE, EX31 4RJ	01-Sep-2023 Approved
WTCA 23/07	Mr Bloomfield - Work to trees in a conservation area: To Fell to bank level 1 no. Variegated Holly (T1) (WTCA) - SEACREST, MARS HILL, LYNMOUTH, EX35 6EF	01-Sep-2023 Approved
WTCA 23/06	Mrs M Harris - Work to trees in a conservation area: To pollard Oak Tree on bank (WTCA) - SUNNYVIEW, WOOTTON COURTENAY, MINEHEAD, TA24 8RF	01-Sep-2023 Approved
6/9/23/013DC	Mr N Rand - Discharge of Condition 4 (sample of glazing) and Condition No 5 (sample of window fittings) of application 6/9/23/003LB (Discharge of Condition) - 3, BATTLETON, DULVERTON, TA22 9HT	05-Sep-2023 Approved
6/26/23/009DC	Mr B Oates - Proposed discharge of condition 3 (Written Scheme of Investigation) of approved application 6/26/23/007LB (Discharge of Condition) - Oatway House, Roadwater, Watchet, TA23 0QY	07-Sep-2023 Approved
6/40/23/005	Mr M Taylor - Proposed erection of a single storey extension and retrospective permission for existing porch. (Householder) - HOE FARM LODGE, WHEDDON CROSS, MINEHEAD, Somerset, TA24 7EY	07-Sep-2023 Approved with Conditions
GDO 23/08	Cellnex UK - Prior notification for the proposed removal of existing steelwork and apparatus, relocation of 2 no. dishes and 6 no. antennas on support poles along with installation of 6 no. poles, 3 no. antennas and other ancillary apparatus and equipment. (GDO - Telecomms) - Barn At Higher	08-Sep-2023 Prior Approval Not Req'd

Application decisions delegated to the Chief Executive

Application Ref	Applicant & Location	Decision and Date
	Gelonscott Farm, Mount Lane, Roadwater, Somerset, Ta23 0qy (E: 303019 & N: 138504)	
6/27/22/117	Mr J Senior - Proposed construction of 1no 2 bed affordable dwelling and pole barn for storage of vehicle and tools. (Full) - Woodland plot, Land to the east side of Villes Lane, Porlock, Minehead, TA24 8NW	08-Sep-2023 Approved with Conditions
62/49/23/007LB	Ms A Creed - Listed building consent for the proposed renovation and remedial works to rear outbuilding and utility extension. Removal of asbestos lean-to and replacement link to outbuilding. (Listed Building Consent) - HEASLEY HOUSE, HEASLEY MILL, SOUTH MOLTON, EX36 3LE	11-Sep-2023 Approved with Conditions
62/49/23/006	Ms A Creed - Proposed renovation of existing property together with the removal of asbestos lean-to and replacement link to outbuilding. (Householder) - HEASLEY HOUSE, HEASLEY MILL, SOUTH MOLTON, EX36 3LE	11-Sep-2023 Approved with Conditions
6/9/23/009	Mr P Waterhouse - Lawful development certificate for the proposed replacement of windows, installation of 3no. rooflights and wood burner flue. Part retrospective. (CLOPUD) - HONEYMEAD, HIGH STREET, DULVERTON, TA22 9HB	13-Sep-2023 Approved
6/15/23/002	Mr & Mrs N & J Whitford - Non-material amendment – householder – of approved application 6/15/22/103 to allow the addition of first floor window to south elevation of extension. (NMA - Householder) - Forge Cottage, Week Lane, BRIDGETOWN, DULVERTON, Somerset, TA22 9JN	14-Sep-2023 Approved
62/43/23/002	Mr. P Miles, Lynton & Barnstaple Railway Trust - Proposed continued use of Rolling Stock Shed, Water Tank and Miniature Railway Facilities. As approved under applications 62/43/03/003, 62/43/10/002, 62/43/13/001 and 62/43/13/002. (Full) - WOODY BAY STATION, PARRACOMBE, BARNSTAPLE, EX31 4RA	18-Sep-2023 Approved with Conditions