

## EXMOOR NATIONAL PARK LOCAL PLAN 5 YEAR REVIEW

### HOUSING AND COMMUNITY TOPIC PAPER MAY 2022

#### 1. Introduction

As a National Park, Exmoor has a higher level of environmental protection than other areas of the country which are not designated as Protected Landscapes. The policies in the Local Plan reflect this, and take as their starting point the statutory purposes of National Parks, which seek to conserve and enhance these special environments, as well as promoting understanding and enjoyment of them. In fulfilling these purposes, the National Park Authority has a duty to promote the economic and social well-being of local communities.

This topic paper relates to section 6 of the adopted Local Plan 'Achieving a Thriving Community' which applies to housing and community services and facilities. The Local Plan provides a bespoke approach to planning for housing and community services and facilities on Exmoor to reflect local circumstances.

#### 2. The Exmoor National Park Housing Strategy

The Local Plan seeks to provide housing and community services and facilities on Exmoor to meet the needs of local communities and reflect local circumstances. A key principle is that the level of development should be compatible with conserving Exmoor's landscape by planning, not for external demand, but instead for housing needed locally. Housing for people who cannot afford market housing is the priority so they can live near family, work or move to Exmoor to work. By adopting this approach, the plan provides certainty and the value of land for housing remains reasonable - within reach of people with a local connection in housing need. The Plan also provides for other housing needed by local communities including rural worker and succession farm housing, and housing for extended families.

Exmoor is one of a very few upland areas in southern England. It is rural and remote. All its parishes have a population of less than 1,500 people. Many of Exmoor's characteristics and the policies which are applied relate to its remoteness and rurality. Development levels are low, partly because of this and also the need to ensure, in a National Park, that the scale and extent of development is limited. This means that five years since adoption of the Local Plan is a relatively short period in which to assess the impact of plan policies. It is also important to distinguish between the effect of plan policies and other factors and changes outside of planning which have an effect on whether development comes forward and can be delivered.

Special circumstances exist in planning for new development including housing in National Parks because they have a different legal and policy framework from other areas.

- National Parks have two statutory purposes including the conservation and enhancement of natural beauty, wildlife and heritage. “Relevant authorities” such as public bodies must have regard to National Park purposes in carrying out their functions.<sup>1</sup>
- In meeting Park purposes, National Park Authorities (NPAs) have a legal duty for the social and economic wellbeing of local communities.
- National policy is that landscape and scenic beauty in National Parks have the highest status of protection and that the scale and extent of development should be limited.<sup>2</sup> National Parks are not given housing targets; the focus is on affordable housing and Local Plans should respond to local housing needs and prioritise local need affordable housing.<sup>3</sup>
- NPAs are planning authorities, but they are not housing providers or housing authorities; Somerset West & Taunton and North Devon Councils are the housing authorities. Equally NPAs do not have an economic development function – this falls to the Somerset and Devon County and district councils which cover the area in the National Park. Local authorities and public bodies, whose functions include economic or social development, and NPAs need to work co-operatively.

### 3. National Planning Policy and Legislation

The 2021 NPPF continues to identify National Park designation as a strong reason for restricting development, that landscape and scenic beauty in National Parks have the highest status of protection and to highlight that the conservation and enhancement of wildlife and cultural heritage should be given great weight. A change in the 2021 NPPF clarifies that the scale and extent of development within National Parks should be limited. New provisions have been added on development within their setting [outside the National Park boundary] which should be sensitively located and designed to avoid or minimise adverse impacts on National Parks.

Changes introduced since the 2012 NPPF include the standard method for assessing housing need which is to be used unless exceptional circumstances justify an alternative approach. The NPPF says the standard method does not apply in National Parks. Entry level exceptions sites have been introduced since the 2012 NPPF but they should not be permitted in National Parks.

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<sup>1</sup> <https://www.legislation.gov.uk/ukpga/1995/25/contents> (sections 61 and 62)

<sup>2</sup> National Planning Policy Framework (July 2021) paragraph 176  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005759/NPPF\\_July\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf)

<sup>3</sup> DEFRA, English National Parks and the Broads UK Government Vision and Circular 2010  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/221086/pb13387-vision-circular2010.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/221086/pb13387-vision-circular2010.pdf), para 78.

The 2021 NPPF refers to the assessment of housing needed for different groups. The Local Plan's needs led approach is responsive to identified local housing need including for self/custom building. The housing strategy also provides for the needs for other groups including rural workers in land-based enterprises and succession farm workers, extended families and for accessible and adaptable housing.

Local Plan policies are considered to be compliant with the limited changes to NPPF policies for rural housing which say that policies should support housing development that reflect local needs and support opportunities to bring forward rural exception sites to meet identified local needs. The Local Plan has a positive strategy to maximise opportunities for local need affordable housing through a rural exceptions approach.

The NPPF recognises that villages may need to grow and thrive especially where this will support local services. The Exmoor Local Plan spatial strategy and a range of other policies set out a positive approach to development in and adjoining named settlements, providing opportunities for them to grow.<sup>4</sup> The overall aim is to address the needs of Exmoor's communities at a scale appropriate to the particular settlement to support a diverse economy and key services to sustain them. Twenty-one named settlements are identified in the Plan - they are considered to be the most appropriate locations for new development. The Exmoor Local Plan has identified more deeply rural small settlements than many local plans - the three largest settlements have populations below 1500 and many of the villages are very small. Additionally, the plan allows for small-scale local need housing in "Rural Communities" which are not part of the spatial strategy.

The 2021 NPPF continues national policy of avoiding new isolated homes in the countryside. Alongside the essential need for a rural worker (provided for in the Local Plan) the NPPF now includes those taking majority control of a farm business, to live permanently at or near their place of work in the countryside. The ENP Local Plan policy (HC-D10 Succession Farming – Second Dwellings on Established Farms) predated this addition to national policy.

The NPPF also now refers to the subdivision of existing residential buildings in the open countryside. The Adopted Local Plan already includes a subdivisions policy, including in the open countryside (HC-D14: Subdivision of Existing Dwellings). This forms part of the overall housing strategy; encouraging the creation of additional smaller homes, potentially enabling downsizing and opportunities for adaption.

## 4. Stakeholder Engagement

### Stakeholder Workshop

A stakeholder online event was held on 2nd December 2021. All those on the Local Plan contacts database were invited to the workshop, along with representatives from Exmoor's parish and town councils. 29 people attended the workshop representing a range of

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<sup>4</sup> Policy GP3 (Spatial Strategy) [https://www.exmoor-nationalpark.gov.uk/\\_data/assets/pdf\\_file/0033/257748/Part-3-General-Policies.pdf](https://www.exmoor-nationalpark.gov.uk/_data/assets/pdf_file/0033/257748/Part-3-General-Policies.pdf)

organisations, local authorities, parish/town councils or as individuals. ENPA members and officers also attended.

Background and a progress update on the Local Plan 5-Year Review were presented followed by a series of workshops to hear views on the Plan. Participants were divided into three groups to ensure everyone had an opportunity to participate in a discussion on every topic. The workshop considered a series of questions. A summary of issues raised through the workshop is available.<sup>5</sup>

A number of areas for future work, including possible planning guidance, were also discussed. Officers considered the comments and reported these to Members in December 2021.

### **Online Survey**

An online survey was conducted following the workshop to gather views and enable those who were not able to attend the workshop to participate in the review. The questions were linked to those posed at the stakeholder workshop focused on the three topics, including housing and community, with an opportunity to raise other issues. The survey was available for six weeks from 11<sup>th</sup> January to 28<sup>th</sup> February 2022. 33 respondents commented on the online survey providing a range of views.

Responses received to the survey have been analysed, reported to members and are set out in a schedule.<sup>6</sup> Feedback included some support for further work such as planning guidance.

Issues relevant to Exmoor's housing and community highlighted during the stakeholder workshop and in response to the online survey are summarised below.

### **Consultation responses - housing**

- Even more important that affordable housing is prioritised on Exmoor
- Affordable housing (for people who cannot afford market housing) is the priority so they can live near family/ work
- Need for more affordable housing and more plots for affordable housing including on outskirts of villages
- Affordable housing viability. Cross-subsidy as an option to deliver more affordable housing
- For cross subsidy, minimum number of market Principal Residence is too vague
- Allow for Principal Residence housing to deliver affordable housing in a different parish
- Delivery of affordable housing – need to establish whether it is a policy issue

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<sup>5</sup> Exmoor National Park Local Plan 5-Year Review Stakeholder Workshop Summary [Exmoor - Exmoor National Park Local Plan 5-Year Review \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk)

<sup>6</sup> Exmoor National Park Local Plan 5-Year Review Survey Responses Schedule [Exmoor - Exmoor National Park Local Plan 5-Year Review \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk)

- Limit new housing to three largest settlements
- No unrestricted market homes - become second and holiday homes
- Definition of 'affordable' thought to help some people – on lowest incomes- but not others
- Affordable housing should “remain so in perpetuity”
- Access to housing for local workers – some travelling in currently,
- Need for workspace/buildings for working from home
- Lack of staff accommodation
- Local housing - employees of local businesses / local workers with a local but not local affordable need tie e.g. as in Yorkshire Dales
- Local wages lower than average in Interim Topic Paper (£18k rather than £28k p.a.)
- Advantages in allowing for local (non-affordable) housing – though may reduce number of affordable homes
- More housing for local people could have unintended consequences: undermining key priority of local affordable housing, particularly for the young, and extra pressure on biodiversity, suitable sites, landscape, and special qualities of remoteness, rurality, wildness and tranquillity
- Local connection criteria too stringent. Should include workers (in addition to agricultural and forestry or jobs benefiting the National Park) e.g. contributing to local economy
- Changes to farming and future needs of farming including new housing
- Housing for elderly and people with disabilities
- Look at interpretation/application of the current policies to be more responsive to e.g. need for self-build
- Local connection criteria and bordering parishes - Brushford
- Maximum floor space of 93m<sup>2</sup> too small e.g. for self-builds. Why does it apply to conversions? Different size limits on owner occupied compared to Registered Provider controlled housing. Need for outbuildings/space for working from home. Larger housing to move to
- Policies are good and progress is being made – patience is needed as development is a long process. There is now a strong pipeline of affordable housing
- Policies not out of date re NPPF, affordable housing delivery strategy not effective enough at enabling delivery of sufficient affordable housing
- Affordable self-builds permitted through the Local Plan - policy is working. Other factors may be affecting delivery
- Strengthen support for community land trusts

#### **Non- policy housing related issues:**

- Concern and wish to prevent or limit second / holiday homes and shortage of rented housing compared to holiday lets. Changes to council tax for second homes
- The loss of the Rural Housing Enabler – now reinstated (in Somerset part of ENP) things seems to be happening - hoped will lead to development

- Loss of affordable housing grants for Registered Providers (RPs) - recently reinstated
- difficulties with Homefinder - does not reflect all local housing need
- Registered Providers (RPs) and scale of sites
- High cost of living on Exmoor
- Potential to look at managed (custom) build options
- Impacts of design requirements and ongoing maintenance costs / need for grants to offset higher costs
- Allow for modern designs of housing
- Greater emphasis on carbon reduction; energy use of materials and building methods
- Opportunities for landowners to release land for affordable housing as lower agricultural values on Exmoor
- Helpful to include plot values

### **Consultation responses - Community**

- Ageing and declining population and the impact on local community services and economy
- Loss of services due to demographics (elderly population) and spending priorities not changes to permitted development
- Example of Community Land Trust shop underway at Parracombe
- Other community shops set up, e.g., Exford, Winsford
- Concern over a local pub changing the way it opens and operates
- Need sensitivity to changes to local circumstances and commercial and community opportunities. New diversified uses preferable to derelict buildings. 'Change of use' should consider and encourage opportunities / benefits to the local community such as community facilities.

It is considered that **the workshop and online survey did not highlight issues which indicate grounds to suggest changes are needed to housing and community services planning policies in the Local Plan.**

## 5. Duty to Co-operate outcomes

A Duty to Co-operate meeting was held with local authority partners on 27 September 2021. This included updates on Local Plans in adjoining Districts as well as Exmoor National Park. No significant issues with the adopted Local Plan housing policies were identified at the meeting. Some points were identified to be taken forward as a helpful basis for future discussions including:

- Ongoing collaboration over updated evidence base and methodology for assessing housing need, including ENPA work to update evidence and review the Local Plan affordable housing need figure,

- Future joint work through duty to co-operate to consider the need for inclusion of National Park housing needs in other plan housing requirements
- A joint methodology for assessing availability of housing and employment sites, to ensure a consistent approach
- The impact of phosphates on European designated nature sites in Somerset. This is currently restricting housing development in areas outside the National Park, but it not anticipated to have a significant impact on Exmoor due to the very small part of the National Park affected
- Provision for Gypsy and Traveller accommodation. Currently there is no identified need for sites on Exmoor, but the Authority will continue to work with the Districts on updated evidence base for this.

In addition, the availability of suitable employment sites in and adjoining the National Park has been raised as an item for Duty to Co-operate discussions.

Natural England contributed responses to the online stakeholder survey on housing:

- query over level of Devon in ENP housing need as recent evidence updated need in Somerset in ENP.<sup>7</sup>
- the impact of potential new housing site allocations. Noted that without the detail of allocations, it was difficult to assess the consequences of more local housing, potential consequences of which could include landscape, visual, changes/gains/loss of biodiversity and habitat connectivity, impacts on protected species and landscapes.

## 6. New and Updated Evidence

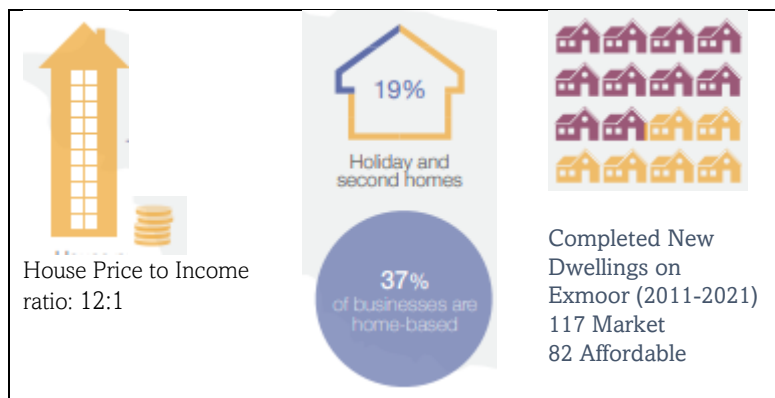
### Second/Holiday Homes

2011 Census data includes a percentage of the housing stock which is either second/holiday home or empty. For Exmoor National Park as a whole, this is 19.4% or nearly one in five dwellings. More recent information will be available once data from the 2021 census is published.

Information from work carried out for Somerset West and Taunton using more up to date council tax data suggests that the proportion of second / holiday or empty homes in the part of Exmoor National Park within Somerset West & Taunton is similar to that in 2011.<sup>8</sup>

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<sup>7</sup> ENPA explanation to aid clarity: *The survey responses schedule explains the reason why updated housing need evidence applies only to Somerset and that the Adopted Local Plan does not include site allocations* [Exmoor - Exmoor National Park Local Plan 5-Year Review \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk) *The purpose of the 5-Year Local Plan Review process is to decide whether the Local Plan needs to be reviewed. If a decision is taken to review part or all of the Local Plan, a programme would need to be agreed including issues and options, evidence gathering, sustainability/habitats assessment and consultation.*



From Rural Enterprise Exmoor Vision  
with updated completions and house price income ratio

### Updated Local Affordable Housing Need Assessment

Two pieces of recent evidence suggest a decrease in the projected need for affordable housing on Exmoor.

ENPA commissioned updated evidence on the local affordable housing need. This examined the evidence for the remaining plan period 2020 to 2031 which gave an updated affordable housing need of 126 dwellings (11 dwellings per annum). The updated affordable housing need figure for the whole plan period of 2011-31 has decreased from 238 (an average of 12 affordable dwellings a year) to 194 dwellings or nearly 10 affordable housing units per year. Importantly for this review process, the updated evidence for the Local Plan indicative affordable housing need figure does not trigger a Local Plan review.<sup>9</sup>

A review of housing need for Somerset West and Taunton as a whole has also been completed recently, using the same methodology, to inform future plan making for the District over the 20-year period covering 2020-2040, which has an eleven year overlap with the Exmoor Local Plan 2011-31. This identifies the size, type and tenure of homes that will be needed in the future, and the housing needs of different groups, including affordable housing.<sup>10</sup>

For the parts of Exmoor National Park within Somerset, the study shows a need for 196 dwellings over the 20-year period (2020-2040) or 10 dwellings per annum. This is the total need for all housing. The affordable housing need is 109 affordable dwellings or 5.5 dwellings per annum. The future annual figure for affordable housing up to 2040 is therefore around half of the Exmoor Local Plan figure up to 2031.

<sup>8</sup> From SWT Council Tax data: there were 4,400 dwellings in total. 603 were second / long term empty. Market dwellings total 3,650. All 603 second home/long term empty homes were market dwellings (therefore 17% of market dwellings are second homes or long-term empty) Figures do not include properties which are empty on a more short-term basis e.g. for sale or one household moving out before another moves in.

<sup>9</sup> Exmoor National Park within Somerset West & Taunton: Local Housing Needs Assessment 2021 [Exmoor - Exmoor National Park Local Plan 5-Year Review \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk)

<sup>10</sup> South Somerset and Somerset West & Taunton Councils: Local Housing need Assessment 2020 Report of Findings August 2021 [Exmoor - Exmoor National Park Local Plan 5-Year Review \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk)



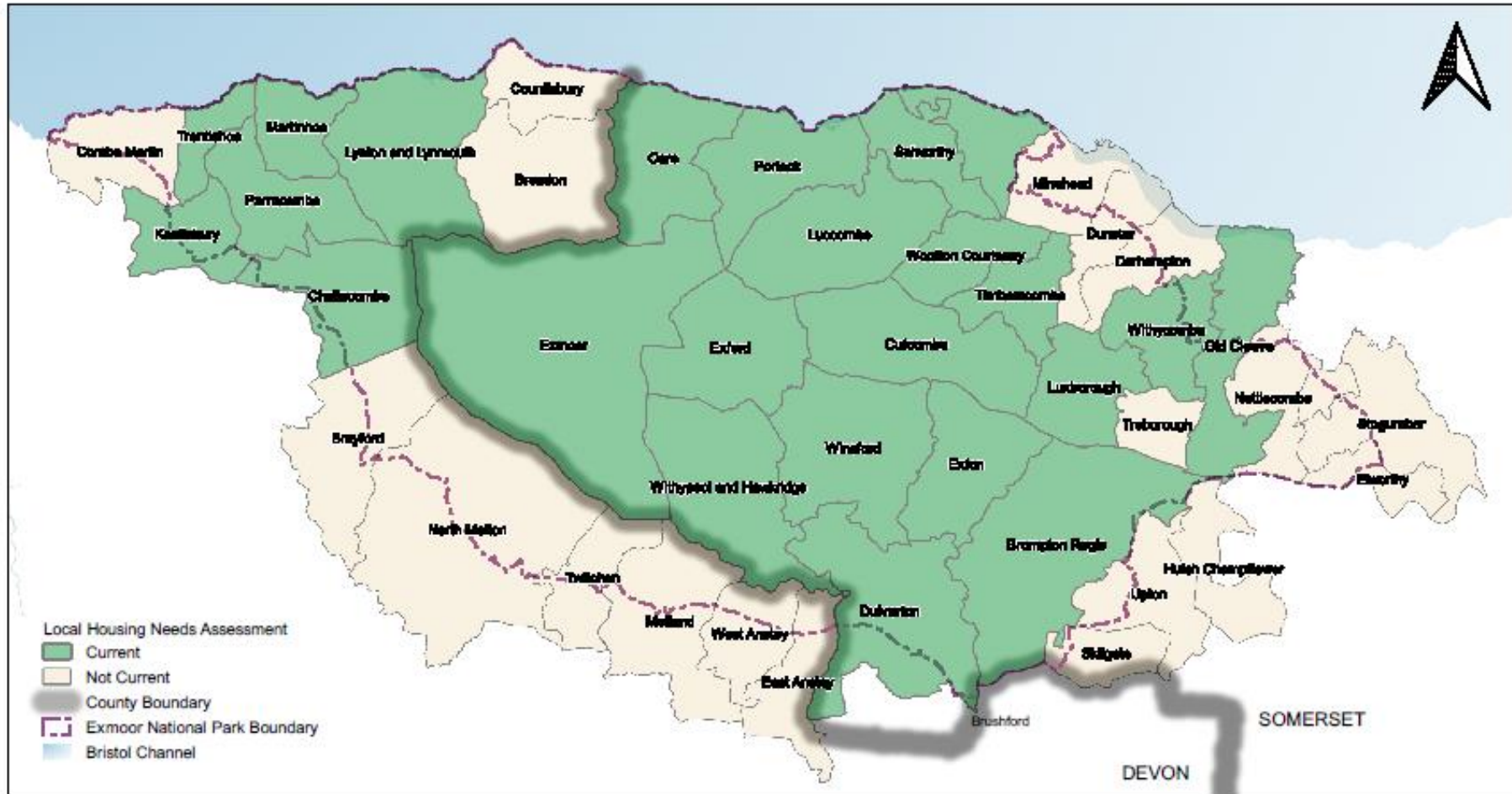
### **Local Parish Housing Need Surveys**

The Local Plan recognises the importance of assessing actual housing need via Local Housing Need Surveys (as opposed to figures based on projections). Housing proposals in the National Park must be supported by evidence of an identified local affordable need. Since 2016, seven parish housing need survey reports have been prepared covering a total of 24 parishes in or partly in the National Park (see map below).

These provide a “snapshot” of the need in Exmoor’s communities and are considered to be the best available information in a rural area like Exmoor compared e.g. to county-wide affordable housing letting systems. The current surveys suggest that there are 53 households in local affordable housing need within ENP. This compares to a previous estimate of need from parish surveys in Exmoor National Park of 90 units in 2013.

# Exmoor National Park Authority

## Local Housing Needs Assessment



Scale: 1:50,000  
 Compiled by MJS  
 on 25/11/2021



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## Rural Enterprise Exmoor (REE)

The Rural Enterprise Exmoor Partnership commissioned work to identify business activity across Exmoor.<sup>11</sup> The Rural Enterprise Exmoor Vision, developed in response to the research work was launched in 2021 on behalf of the REE Partnership. It is a long-term high-level vision for 2030.<sup>12</sup> The starting point was recognition that Exmoor is a remote and deeply rural area. It has low social mobility, below average wages and higher than average house prices. More detail is provided in the economy topic paper.

The vision does not seek to provide a detailed delivery plan, rather it is intended to provoke discussion and provide partners with guidance on key areas of focus for future activity, as well as being used to feed into the work of others. A summary is below.

The vision identifies a number of issues: high house prices due to demand from people moving to the area and second/holiday homes; the loss of skilled people and the effect on communities of local people moving away; population decline continuing to affect the viability of local services and businesses; greener construction methods needed in response to the climate crisis; the effects of Covid accelerating trends towards more flexible working and the attractiveness of Exmoor to live and work; and the need to respect Exmoor's heritage and environment. In the context of these issues the REE vision says there should be:

- More affordable housing: Working with councils, housing associations and community organisations, more homes for sale or rent, which are truly affordable by local working households.
- More homes for local people: More homes available in perpetuity for people with a history of living and working on Exmoor
- More homes overall: A modest increase to address the needs of local communities which could help build a sustainable population across all age groups.
- More adaptable homes: Homes that are adaptable and sized to suit the needs of local workers, support for changes of use to enable home working and retrofitting for greener buildings.

The Vision says: 'Many of these suggestions are already catered for within the Exmoor Local Plan.'

The Vision also proposes local land trusts or community development trusts as a way of building and protecting local homes. It notes that homes owned in trust on behalf of the community is one of the most effective ways of keeping housing for local people in perpetuity. Parracombe has a Community Land Trust (CLT), and it is working towards

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<sup>11</sup> <https://www.exmoor-nationalpark.gov.uk/living-and-working/business-and-economy/rural-enterprise-exmoor-research> The partnership included the Heart of the South West Local Enterprise Partnership, four local authorities for the National Park area and the NPA. In 2020 the partnership was expanded to include representative business groups (Exmoor Hill Farming Network, Visit Exmoor, West Somerset Business Group and the Federation of Small Businesses)

<sup>12</sup> <https://www.exmoor-nationalpark.gov.uk/living-and-working/business-and-economy/rural-enterprise-exmoor-vision>

provision of locally needed affordable homes as well as managing and developing other local facilities. The West Somerset CLT has also been looking at ways of providing local need affordable housing in the area.

As a partnership document, it is not intended that any single organisation has a sole remit covering the breadth of activity in the vision and it does not seek to provide a detailed delivery plan, instead it is intended to provoke discussion and provide partners with guidance on key areas of focus for future activity, and to feed into the work of others. The vision provides suggestions to be discussed, agreed and delivered in ways which are appropriate to Exmoor and its particular circumstances.

## 7. The Exmoor National Park Authority Monitoring Report (AMR) and Housing Monitoring

Planning Practice Guidance and the PAS Local Plan Route Mapper guidance documents recommend using evidence gathered through the annual monitoring process as part of any plan review. Some key AMR data on housing is summarised below, focusing mainly on delivery.

The Local Plan includes a Vision, Objectives and Strategic Priorities for the Local Plan to 2031.<sup>13</sup> Data is gathered through the AMR against Local Plan monitoring indicators linked to the objectives and the Plan's policies. Since Local Plan adoption, AMRs have been published for 2017/18 - 2018/19.<sup>14</sup> 2019 -21 AMR data is summarised in this paper and an interim summary version is available.<sup>15</sup> Additional annual housing monitoring for Local Plan Policy M1-S1 (Monitoring and Review of Affordable Housing Need and Provision) will be reported in the 2019-21 AMR report.

### House Prices

House price data for 2017-2021 has been extracted from the Land Registry House Price Paid data, which includes information on all property sales that are lodged with the HM Land Registry. Exmoor's and South West England's house prices have fluctuated since 2017. The 2020-21 figures show sharp price rises for Exmoor with an almost 27% increase (although this followed a decrease of nearly 12% the previous year). Table 1 shows that the Exmoor median (mid-range) price paid has been higher than West Somerset (now Somerset West & Taunton) district, North Devon district and South-West England every year. It is now £327,500, significantly above the median figure for South-West England of £245,000.

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<sup>13</sup> [https://www.exmoor-nationalpark.gov.uk/\\_data/assets/pdf\\_file/0032/257747/Part-2-Vision-Objectives-and-Strategic-Priorities.pdf](https://www.exmoor-nationalpark.gov.uk/_data/assets/pdf_file/0032/257747/Part-2-Vision-Objectives-and-Strategic-Priorities.pdf)

<sup>14</sup> <https://www.exmoor-nationalpark.gov.uk/planning/planning-policy/local-plan/annual-monitoring-reports>

<sup>15</sup> Exmoor National Park Authority Monitoring Report 2019-21 Interim Summary [Exmoor - Exmoor National Park Local Plan 5-Year Review \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk)

The ratio of average house prices to average household income has also fluctuated in recent years, (see Table 1 below). This ratio is based on an average household income of £28,000<sup>16</sup>, and then compared to the average house price on Exmoor in each year. Households on an average household income would be unable to afford an average priced property.

	<b>2017/18</b>	<b>2018/19</b>	<b>2019/20</b>	<b>2020/21</b>
Exmoor	270,000	£293,250	£258,750	£327,500
SW England	£240,000	£230,000	£230,000	£245,000
West Somerset/Somerset West and Taunton <sup>17</sup>	£230,000	£238,250	£230,000	£234,995
North Devon	£230,000	£232,000	£247,500	£249,975
Ratio of average house prices to average household income	-	10:1	9:1	12:1

### **Affordable Housing Delivery**

Total affordable housing completions, those under construction, and extant 'not yet started' permissions are monitored annually and are set out in Table 2 below.

	<b>2017/18</b>	<b>2018/19</b>	<b>2019/20</b>	<b>2020/21</b>	<b>Total Completions</b>
Affordable dwellings with extant planning permission not yet started	18	2	0	0	
Affordable dwellings under construction	15	25	27	9	
Affordable dwelling completions	2	2	1	20	<b>25</b>

Applications for seven local need affordable dwellings are subject to satisfactory completion of a S106 legal agreement. These are not included in the figures in Table 2.

Other affordable housing proposals and discussions are at different stages in the planning or pre-planning process. These include sites being progressed through a community land trust and sites consulted on and being progressed by the 8 Parishes Affordable Housing Working Group, some of which could be sites for local need self/custom build.

### **Total Housing Completions**

Total housing completions, and those "in the pipeline" as either permissions which had not yet started or were under construction are set out in Table 3 below. They include both affordable and other (market) housing completions – the latter are those that do not fall within the definition of affordable housing which includes housing that Local Plan Policy HC-S1 identifies as housing needed by the local community such as rural worker dwellings;

<sup>16</sup> [Housing Topic Paper \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk)

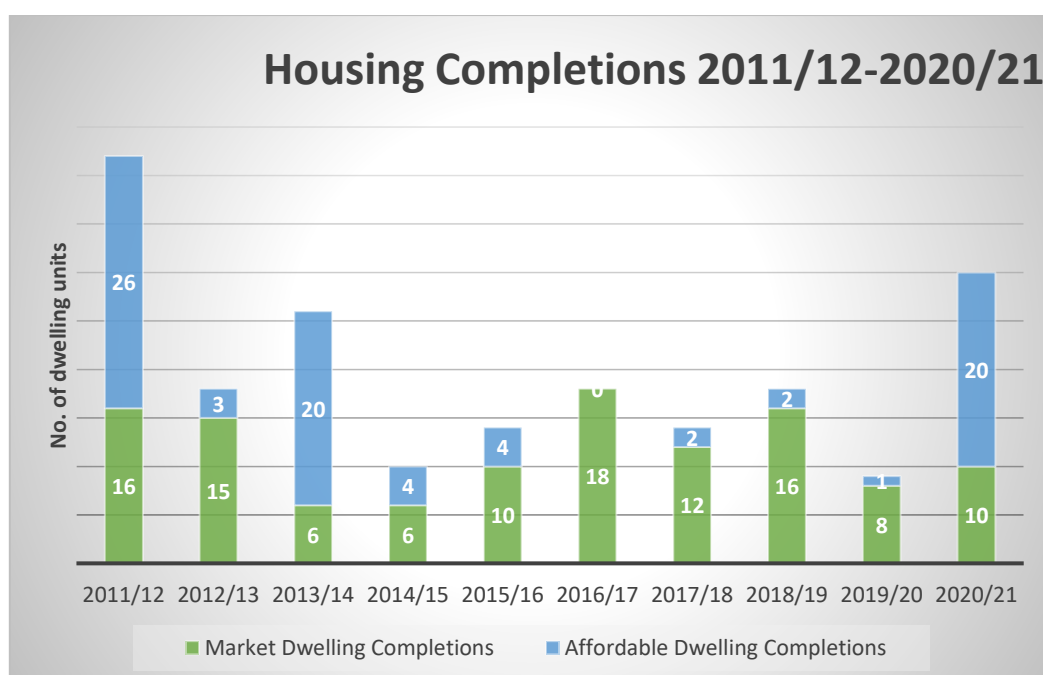
<sup>17</sup> Figures are for West Somerset 2017 - 2018 and Somerset West & Taunton 2019 - 2020

succession farm dwellings; and extended family dwellings with occupancy ties (see Table 4 below).

The market housing element of the total figures in Table 2 can also include new dwellings created through subdivisions, holiday lets (providing visitor accommodation and supporting the local economy). A number of other new dwellings have been confirmed under certificates of lawful use.

Local Plan Indicator	2017/18	2018/19	2019/20	2020/21	Total Completions
Number of dwellings with extant planning permission not yet started	44	56	52	24	
Number of dwellings under construction	41	52	49	71	
Net dwelling completions	14	18	9	30	<b>71</b>

The number of completions taken from Table 1 and Table 2 is represented in the graph below. It distinguishes affordable and other housing (market) that does not come within the definition of affordable housing. For the purposes of this 5-year Local Plan review the starting year is 2017/18 onwards. Permissions and completions of affordable housing since adoption have been lower than hoped although the completion of 20 affordable homes in 20/21 has been positive and there are signs of more activity in terms of affordable housing.



Market housing numbers in Table 3 and the graph above can be broken down further to show the number that were rural worker, succession farm dwellings and extended family dwellings. These are shown in Table 4 below.

<b>Local Plan Indicator</b>	<b>2017/18</b>	<b>2018/19</b>	<b>2019/20</b>	<b>2020/21</b>
Number of extended family dwellings completed	1	3	0	0
Number of rural land-based worker dwellings completed	0	2	0	0
Number of succession farm dwellings completed	1	0	0	0
<b>Total</b>	<b>2</b>	<b>5</b>	<b>0</b>	<b>0</b>

### **Residential Extensions**

Local Plan policy HC-15 relates to residential extensions. Extensions should be proportionate to the size of the existing dwelling and not increase its floorspace by more than 35%. The majority of applications for residential extensions are approved (See Table 5). This may reflect the ability for prospective applicants to engage with the NPA at an early pre-application stage.

<b>Local Plan Indicator</b>	<b>2017/18</b>	<b>2018/19</b>	<b>2019/20</b>	<b>2020/21</b>
Applications for residential extensions approved	17	29	46	36
Applications for residential extensions refused	0	2	3	4

### **Self/Custom Build Housing**

Policy HC-D6 (Custom/Self Build Local Need Housing) encourages custom/ self-build housing where it will meet an identified local affordable housing need. Additionally, self and custom build housing may also be a method of building forms of housing which do not fall within the definition of affordable housing including rural worker housing, succession farm dwellings and extended family dwellings.

Local Planning authorities, including National Park Authorities are required to have a self-build register. In October 2020, 54 individuals and one group were on the Exmoor National Park register.<sup>18</sup> This includes 11 individuals on Part 1 of the register who meet the local connection tests of the Local Plan

Table 6 shows the number of planning permissions granted by Exmoor NPA for housing which meet the Government definition of custom/self-build housing.

<sup>18</sup> [Exmoor - Self Build on Exmoor \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk)

Pre 2017	9
2017/18	5
2018/19	5
2019/20	5

The number and type of households on the Register is evidence of the interest in self-build in Exmoor National Park and is taken account of by the National Park Authority as local planning authority. The register is updated as needed and is monitored and reported on annually. However, people can still be eligible for self/custom build housing if they are not entered on the self-build register.

## 8 Monitoring and Review of Affordable Housing Need and Provision

Exmoor National Park Authority is required by Policy M1-S1 (Monitoring and Review of Affordable Housing Need and Provision) to monitor both affordable housing need (i.e. the 238 figure), and delivery of affordable housing. An increase of more than 20% in the Plan's indicative affordable housing need figure of 238 dwellings 2011-31 (average of 12 per annum) would trigger a full or partial review of the Plan.

An updated assessment of affordable housing need was commissioned (as set out in the Evidence section above). This concluded that the affordable housing need figure for the area 2011-31 has decreased from 238 or an average of 12 dwellings a year to 194 dwellings or nearly 10 affordable housing units per year. This equates to a reduction in the local affordable housing need figure of nearly 19%. **Consequently, a local plan review is not triggered by the change in the evidence for the Local Plan indicative affordable housing need figure.** The evidence will be useful as a basis for future discussions with neighbouring authorities through duty to co-operate.

Local Plan Policy M1-S1 has a series of monitoring requirements for affordable housing. If none of these are met, a review of the reasons for under delivery with stakeholders should be carried out. This monitoring requirements include:

- affordable housing permissions;
- affordable housing completions; and
- other affordable housing measures:
  - the number of households in affordable housing need from parish housing need surveys compared to the number of affordable homes in the “pipeline” i.e. permitted but not completed; and
  - turnover (lets and relets) in Exmoor’s existing stock of affordable housing.

Monitoring has shown that the number of affordable dwellings permitted over the last three years is not sufficient to meet the requirements of Policy M1-S1 (10% of the indicative affordable housing need figure, equivalent to 24 affordable housing dwellings). In addition,



the total number of affordable housing completions since 2011 is not high enough to meet affordable housing need to date. The updated evidence shows that the projected figure of 238 dwellings has reduced to 194 (nearly 10 rather than 12 a year). This means that the shortfall between the permissions granted, completions and the projected need is lower than it would have been.

The final test in Policy M1-S1 is to assess whether housing need surveys show that housing delivery meets identified local needs from parish housing need surveys. The surveys indicate a current affordable housing need of 53 households. Affordable housing that is under construction added to the number of lets/relets totals 55. **Consequently, monitoring demonstrates that a review of the Local Plan is not triggered by the requirements of Policy M1-S1.** A summary of the figures against Policy M1-S1 is in Appendix A.

While M1-S1 is met, the delivery of affordable housing since Plan adoption has been lower than hoped and has been a cause for concern. For the purposes of this 5-year Local Plan review, the issue that needs to be addressed is whether local plan policies need to be reviewed to support delivery or whether there are other actions needed which are not dependent on changes to the local plan.

#### **Affordable Housing Delivery and Issues and Actions not Dependent on Local Plan Policies**

With the exception of the Live West affordable housing scheme for 18 houses in Dulverton, it is notable that larger affordable housing schemes of 9 or 10 + houses have not come forward for a number of years compared to the previous plan period. Indications are that delivery was affected by significant reductions (following national austerity measures) in Homes England grant funding available to housing providers such as housing associations, as well as other national changes to affordable housing. Similarly, reductions in budgets led to the loss of the Exmoor Rural Housing Enabler (RHE) role. Since early 2020, progress on affordable housing delivery was affected by the Covid pandemic.

A range of joint work is underway to address affordable housing delivery issues (as the NPA is neither a housing provider nor a housing authority it cannot itself bring forward affordable housing). There are some positive signs regarding the potential for affordable houses and affordable housing schemes to come forward:

- In January 2021, Somerset West and Taunton qualified as an “affordable housing challenge area” which meant that social rent grant levels became available in the district for Registered Housing providers, including housing associations, (following earlier reinstatement in North Devon). Grants for genuinely affordable rented housing are, once again, available for the whole National Park;
- The appointment of a new Rural Housing Enabler for Exmoor parishes in Somerset,
- Work by the 8 parishes Affordable Housing Group to consult with communities and take forward work on sites with potential for affordable housing;
- The establishment of Parracombe Community Land Trust (CLT) and West Somerset CLT interest in progressing affordable housing schemes;

- Advice from Middlemarch in North Devon and Somerset for communities wishing to consider community land trusts and local need affordable housing;
- Continued interest and work by Exmoor Young Voices including support and advice on finance for local self/custom self-builders;
- The relaunch of the Exmoor Rural Housing Network.

Exmoor National Park Authority continues to work with partners to implement the Local Plan's affordable housing policies and, as a local planning authority, support delivery of local need affordable housing.

## 9 Exmoor National Park Local Plan- Community

### **Community Services and Facilities Strategy**

For the size of its communities Exmoor still retains a relatively wide range of services and facilities. The Local Plan provides a bespoke approach to planning for community services and facilities on Exmoor to reflect local circumstances. It recognises their importance and seeks to maintain and enhance community services and facilities to help to meet the day to day needs of local communities as well as benefit visitors through: Identifying “named settlements” as suitable locations for development. Local Service Centres (Dulverton, Lynton/Lynmouth and Porlock) have a relatively extensive range of services / facilities that also serve a wider hinterland, and Villages and Porlock Weir are smaller settlements with a more limited range of services that serve the local community. Named settlements provide opportunities for development to be closer to services and jobs, and to help maintain a range of local services and facilities. The overall aim is to ensure that communities are sustained over the longer term (Policy GP3 Spatial Strategy) by:

- Guarding against loss - policies cannot ultimately prevent the loss or closure of community services and facilities but change of use can be managed where permitted development rights do not apply.<sup>19</sup>
- Enabling existing shops, services and facilities to develop and modernise sustainably so they can be retained, enabling sharing of facilities and flexibility - so that a range of services can continue to be provided in communities such as in a single premises and new community services and facilities.<sup>20</sup>
- Safeguarding existing outdoor recreation areas and publicly accessible amenity areas in / adjoining settlements).<sup>21</sup>

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<sup>19</sup> Policy HC-S6 Local Commercial Services & Community Facilities & HC-D19 Safeguarding Local Commercial Services & Community Facilities

<sup>20</sup> Policy HC-S6 Local Commercial Services & Community Facilities, HC-D18 Local Commercial Service Provision & HC-D19 Safeguarding Local Commercial Services & Community Facilities

<sup>21</sup> (HC-S6 Local Commercial Services & Community Facilities, HC-D19 Safeguarding Local Commercial Services & Community Facilities & HC-D20 Important Visual Amenity Space.

## 10 National Planning Policy and Legislation

Since the Local Plan was adopted, the Use Classes Order has been amended to create:

- Use Class E (Commercial, Business and Service). This combines a broad range of uses such as retail, business, some residential institutions and indoor sport.<sup>22</sup>
- Use Class F (Local Community and Learning).<sup>23</sup>

A number of policies in the Exmoor Local Plan make specific reference to former use classes (e.g. 'A' use class such as shops). This is not considered to be a significant issue - Local Plans often contain legal or policy references which have changed. The former use class can be checked against the most up to date category on a case-by-case basis to implement plan policies.

Changes to permitted development rights have also been introduced. Some do not apply in National Parks, and some development requires prior approval. However, unless other aspects of a proposal require planning permission, the National Park Authority may not be aware of changes under permitted development rights (PD).

The Local Plan and its policies do not have the powers alone to deal with all economic issues, and there are limits to planning powers and what the planning system can deliver. Given the generally small scale of the businesses in the National Park, monitoring changes of use within uses to other types of business or economic use, which are now available or permitted is challenging. This makes it difficult to assess the full impact of changes.

Changes to the National Planning Policy Framework (NPPF) have been made since the Local Plan was adopted.<sup>24</sup> Officers have checked that adopted plan policies still reflect current national planning policy requirements in the 2021 NPPF. The analysis has focused on changes since the 2012 NPPF because an independent inspector concluded that the Exmoor Local Plan policies were in line with the 2012 NPPF and much of the 2021 NPPF has been carried forward from 2012. The NPPF is a material consideration in decision making.

The 2021 NPPF continues to identify **National Park designation** as a strong reason for restricting development, that landscape and scenic beauty in National Parks, have the highest status of protection and to highlight that the conservation and enhancement of wildlife and cultural heritage should be given great weight. A change in the 2021 NPPF clarifies that the scale and extent of development within National Parks should be limited. New provisions have been added on development within their setting [outside the National

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<sup>22</sup> Including retail, cafes & restaurants, financial services, professional services, estate and employment agencies, indoor sport, recreation or fitness, medical or health services, non-residential creches, day nurseries or day centres, offices, research and development, and light industrial. Public Houses were formerly in the A use class but are now 'sui generis' The Local Plan provides flexibility in Local Rural Centres for commercial services, including public houses, to change use within the 'A' Use Class.

<sup>23</sup> [https://www.planningportal.co.uk/info/200130/common\\_projects/9/change\\_of\\_use](https://www.planningportal.co.uk/info/200130/common_projects/9/change_of_use)

<sup>24</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/100575/9/NPPF\\_July\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/100575/9/NPPF_July_2021.pdf)

Park boundary] which should be sensitively located and designed to avoid or minimise adverse impacts on National Parks. There are a number of other amendments in the NPPF.

There are relatively few changes to the NPPF in relation to **community services and facilities**. Those considered to be most relevant are set out below.

**Open spaces** have been added to a number of NPPF paragraphs alongside other needed services. The adopted Local Plan already includes public open spaces (such as those for recreation) as a community facility<sup>25</sup> as well as identifying important open spaces for visual amenity.<sup>26</sup>

There is a new emphasis on retention and development of *accessible* local services and community facilities. Policy GP3 (Spatial Strategy) seeks to ensure that most new development is provided in named settlements to help support local services and facilities. New community services and facilities are encouraged in named settlements where they are more accessible.<sup>27</sup> Policies also allow for small-scale and ancillary service provision on farms or at visitor facilities in the open countryside.

The NPPF contains new text on enabling and supporting healthy lifestyles, including through green infrastructure, sports facilities, local shops, access to healthier food and allotments. The Local Plan safeguards community services and facilities including areas for sport and physical activity such as playing fields, shops and allotments (the latter are identified as important open spaces for recreation).<sup>28</sup> Green Infrastructure policies in the Plan encourage the creation and improvement of green infrastructure, including allotments, and recognise the range of benefits such land can have e.g. for recreation, biodiversity and in terms of climate change.<sup>29</sup> Together with other policies which protect open spaces in settlements, Exmoor's rights of way and access land (as well as its extensive areas of semi-natural habitats – moor, heath, and woodland) the Plan accords with changes to national policy.

Lastly the NPPF includes changes which aim to ensure faster delivery of other public service infrastructure such as further education colleges, hospitals and criminal justice accommodation. Local planning authorities should continue to work proactively and positively with promoters, and also now delivery partners and statutory bodies to plan for required facilities. Continued joint working through duty to co-operate will help identify needed infrastructure such as for schools. In general, on Exmoor these are small scale; there is no larger public service infrastructure such as further education colleges or hospitals in the National Park.

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<sup>25</sup> Policies HC-S6 (Local Commercial Services & Community Facilities); HC-D18 (Local Commercial Service Provision) & HC-D19 (Safeguarding Local Commercial Services & Community Facilities).

<sup>26</sup> Policy HC-D20 Important Visual Amenity Space

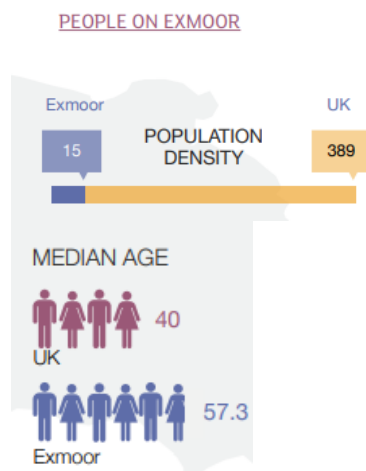
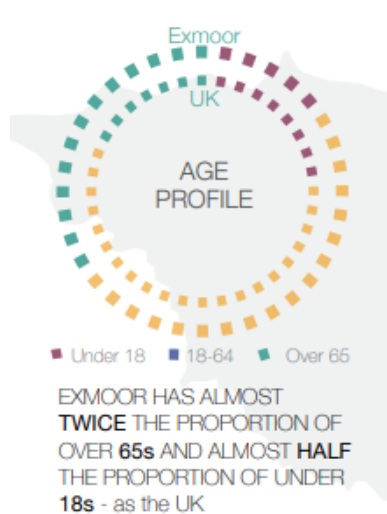
<sup>27</sup> Policy HC-D18 (Local Commercial Service Provision)

<sup>28</sup> HC-D19 (Safeguarding Local Commercial Services & Community Facilities)

<sup>29</sup> CE-S3 (Biodiversity & Green Infrastructure) & CE-D2 (Green Infrastructure Provision)

## 11 Updated Evidence

### Population



The REE work provided population data for Exmoor.

- The most recent 2017 population figure is 10,200 people.
- The 2011 figure was 10,300
- The 2001 figure was 10,900
- The 1991 figure (not included in the vision) was 10,600

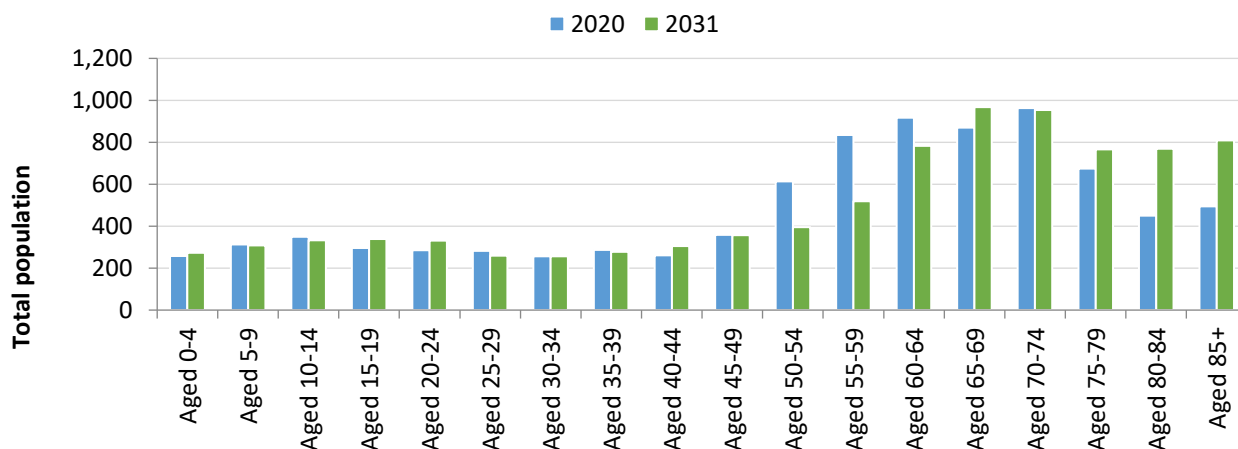
From Rural Enterprise Exmoor Vision

Updated information on Exmoor's population and demographics has been completed for the Somerset part of Exmoor National Park. This indicates that the population in Exmoor is typically older and with fewer children than for Somerset West and Taunton as a whole. Natural change has been steadily negative over the last decade, whereas inward migration has varied. The net impact of these changes is that the resident population of ENP (in Somerset) is estimated to be lower than it was a decade earlier. Updated figures for the whole of Exmoor are not currently available.

### Projected Population Age Profile

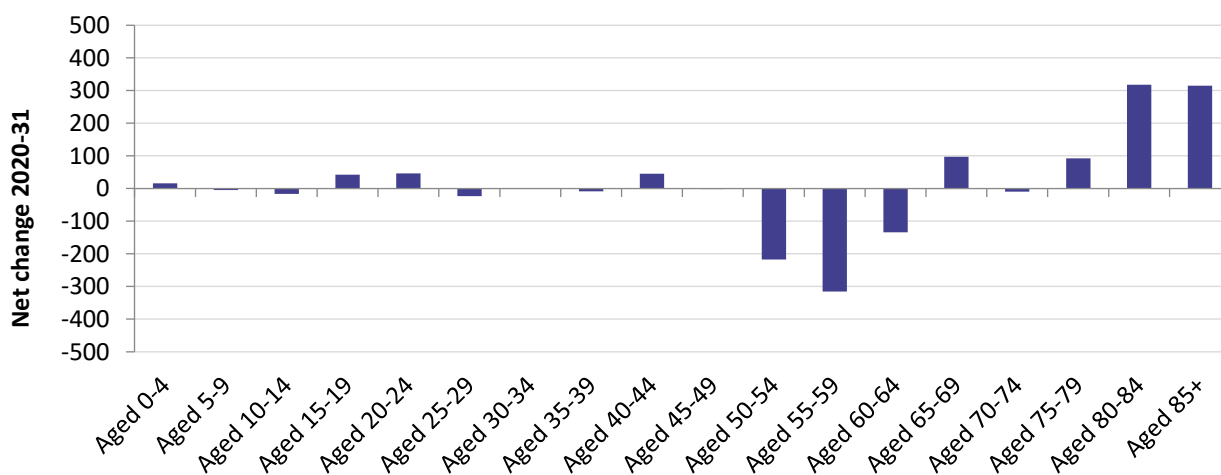
The graph below shows the projected change in the population of ENP in Somerset for the period 2020-31 based Upon 5-Year Migration Trends. The projection shows a steep decline in the population aged 50-64 years, a rise in those aged over 65 years and little change in younger age groups.

**Population projections 2020-31 by 5-year age cohort for Exmoor NP within SWT** (Source: ONS 2016 based sub-national projections in ORS report Exmoor NP Within Somerset West & Taunton Local Housing Needs Assessment 2021)



Overall, it is projected that the trends of net migration and an already ageing population will see a drop in the older working age population. The changes are shown in the graph below:

**Change in population projections 2020-31 by 5-year age cohort for Exmoor NP within SWT** (Source: ONS 2016 based sub-national projections in ORS report Exmoor NP Within Somerset West & Taunton Local Housing Needs Assessment 2021)



Because the overall size of the population for ENP in SWT is small, the numbers in some categories are also small, but overall trends show a growing number of single person households, a small decline in couples without children and little change in family or other households.

## 12 The Exmoor National Park Authority Monitoring Report (AMR)

### Community Services and Facilities

Planning permissions for community services and facilities since adoption of the Local Plan are summarised in Table 7 below. Some changes of use are permitted through the General Permitted Development Order and the figures in the table exclude any instances of these.

AMR monitoring shows that proposals for changes and extensions to existing facilities are coming forward. In some cases, this has been to create ancillary additional facilities to support an existing business in line with policies in the Local Plan. New facilities have been permitted such as the shop at Parracombe (through the extension and reuse of the existing pavilion). Lastly, others have seen the replacement of existing facilities: the bank in Dulverton has become a mixed-use radio station, studio and theatre; a pub, also in Dulverton is now a shop/workshop. In Lynton, a shop is now a restaurant; and an artist's studio has become a rural enterprise centre providing offices and hot desking facilities. Permissions since adoption of the Local Plan are included in Appendix B.

	2017/18		2018/19		2019/20		2020/21	
	Gain	Loss	Gain	Loss	Gain	Loss	Gain	Loss
<b>Shops</b>	3			3	2			
<b>Financial &amp; Professional Services</b>					1			1
<b>Restaurants &amp; Cafes</b>			1		1		1	
<b>Drinking Establishments</b>		1			1			
<b>Hot Food Take Aways</b>								
<b>Non- Residential Institutions</b>			1	2			1	1
<b>Assembly &amp; Leisure</b>	1			1				
<b>Other / Sui Generis</b>		2	1		1		2	

## APPENDIX A: Monitoring &amp; Review of Affordable Housing Delivery (Exmoor Local Plan Policy MI-S1)

<b>HOUSING DATA Years 1<sup>st</sup> April to 31<sup>st</sup> March</b>	<b>2011/12</b>	<b>2012/13</b>	<b>2013/14</b>	<b>2014/15</b>	<b>2015/16</b>	<b>2016/17</b>	<b>2017/18</b>	<b>2018/19</b>	<b>2019/20</b>	<b>2020/21</b>	<b>Totals Plan</b>	<b>Totals</b>
<b>1. Total Local Plan Need (2011-2031)</b>											<b>238</b>	
<b>2. Cumulative Local Plan Need (11.9 per annum rounded to 12)</b>	12	24	36	48	60	72	84	96	108	<b>120</b>		120
<b>3. Total Local Plan Need (2011-2031) updated Figure</b>											<b>194</b>	
<b>4. Cumulative Local Plan Need 2011-31 (rounded to 10)</b>	10	20	30	40	50	60	70	80	90	100	-	<b>100</b>
<b>5. Affordable Housing Completions</b>	26	3	20	4	4	0	2	2	1	<b>20</b>	<b>82</b>	<b>82</b>
<b>6. Local Need Housing Survey Reports (completed 2016 –date)</b>										<b>53</b>		<b>53<sup>30</sup></b>
<b>7. Under Construction</b>										<b>9</b>		<b>9</b>
<b>8. Extant Permission</b>										<b>0</b>		<b>0</b>
<b>9. Lets/Re-lets</b>										<b>46</b>		<b>46</b>
<b>10. Total Existing Provision</b>										<b>55</b>		<b>55</b>
<b>11. Cumulative Permissions Past Three Years</b>								<b>4</b>	<b>1</b>	<b>0</b>	<b>5</b>	<b>5</b>
<b>12. 10% Local Plan Affordable Housing Indicative Figure (238 = 24)</b>												
<b>13. 10% Local Plan Updated Affordable Housing Figure (194 = 19)</b>												

<sup>30</sup> Total of affordable housing need in reports completed since 2016



## APPENDIX B Permissions Community Service and Facility Since 2017

New and extended shops / cafes: extension to Community Shop and Post Office Roadwater (2018/19); extension of pavilion to create a community shop and café, Parracombe (2019/20); part change of use to a mixed-use Post Office and cafe area, Wootton Courtenay (2019/20).

Changes to shops: Change of use of shop to restaurant (Lynton (2018/19); change of use of shop to a Therapy Clinic (D1), Dulverton (2018/19); change of use from a shop to a mixed use (shop/ dog grooming premises). Dulverton (2018/19) Extension of dwelling to provide space for a larger shop, storeroom, office and commercial kitchen Barbrook Garage (2019/20)

Financial services: Change of use from bank to a mixed-use community radio station, recording studio and studio theatre, Dulverton (2020/21).

Cafes and restaurants: Extension of tea rooms, Dunster (2019/20); Extension for tearoom, Post Office Challacombe (2020/21); Replacement of temporary tearoom with permanent tearoom building, Woody Bay Station (2020/21)

Changes to Pubs: Change of use of pub to shop and workshop for repair of musical instruments, Dulverton (2017/18); Extension of The Culbone, Porlock (2019/20)

Offices: Change of use of 3 B1 offices to a flexible use: B1(a), A2, D1 and D2 Dulverton (2019/20); change of use D1 artists' studio/centre to class E rural enterprise centre with 6 individual work hub offices and hot desk facilities, Lynton (2020/21).

Schools Extension to school reception area, & other alterations. Dunster First School (2019/20)

Sports and play areas: Replacement sports pavilion, Wheddon Cross (2019/20); Change of use to a natural play area and seating area, Near Bossington (2019/20)