



EXMOOR

NATIONAL PARK

EXMOOR NATIONAL PARK AUTHORITY
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21 March 2019

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 2 April 2019 at 10.00am.**

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 Chairman 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 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 **video and audio recorded**. By entering the Authority's Committee Room and speaking during Public Speaking you are consenting to being video and audio recorded.

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 Chairman 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 first section of the meeting will be chaired by Mr R Milton, the Chairman of the Authority. If the Chairman is absent, the Deputy Chairman shall preside.

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. Chairpersons's Announcements

4. **Minutes** (1) To approve as a correct record the Minutes of the meeting of the Authority held on 5 March 2019 (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.

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 be chaired by Mr M Dewdney (Deputy Chairperson (Planning)). If the Deputy Chairperson (Planning) is absent, the Deputy Chairperson of the Authority shall be preside.

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

Agenda Item	Application No.	Description	Page No's.
6.1	6/8/19/101	Proposed area for storing timber and associated equipment. Retrospective (Full) – Allercott Farm, Allercott, Timberscombe, Minehead, Somerset	1 – 10
6.2	6/10/18/113	Proposed extension of tea room. (As per amended plans and additional information). (Full) – Water Mill Tea Rooms, Mill Lane, Dunster, Somerset	11 - 37
6.3	6/9/19/105	Application under Regulation 3 of the Town and Country Planning General Regulations 1992 for the proposed change of use of 3 interconnecting offices from use class B1 to a flexible use comprising B1(a), A2, D1 and D2. (Amended description) (Full) – 7-9 Fore Street, Dulverton, Somerset	38 - 44

6.4	6/14/19/102	Application under Regulation 3 of the Town and Country Planning General Regulations 1992 for proposed partial demolition of building and alterations to door and window openings (Full) – Whiterock Cottage, Field Studies Centre, Simonsbath, Somerset	45 - 52
6.5	6/14/19/101	Application under Regulation 3 of the Town and Country Planning General Regulations 1992 for proposed removal of existing PV solar tiles and replace with 36 Trina 300w PV modules (Full) – Pinkery Outdoor Education Centre, Simonsbath, Minehead, Somerset	53 - 60
6.6	6/13/19/104	Application under Regulation 3 of the Town and Country Planning General Regulations 1992 for proposed replacement log shed & extension to create timber store (Full) – Exmoor National Park Workshop, Auction Fields, Exford, Somerset	61 - 71

- 7. Application Decisions Delegated to the Chief Executive:** To note the applications determined by the Chief Executive under delegated powers (Item 7).
- 8. Site Visits:** To arrange any site visits agreed by the Committee (the reserve date being Friday 3 May (am)).

The remaining section of the meeting will be chaired by Mr R Milton, Chairperson of the Authority. If the Chairperson is absent, the Deputy Chairperson of the Authority shall preside.

- 9. Exmoor National Park Authority Corporate Plan 2019/20:** To consider the report of the Head of Strategy and Performance (Item 9).
- 10. Annual Governance Review:** To consider the joint report of the Solicitor and Monitoring Officer and Chief Finance Officer (Item 10).
- 11. External Audit Plan for the Year Ending 31 March 2019:** To consider the report of the Chief Finance Officer (Item 11).
- 12. Personnel Update**

Leavers:

- 15.02.19 Charlotte Thomas – Historic Signpost Project Officer
 26.02.19 Lily Cox – Field Services Apprentice
 31.03.19 Patrick Dempsey – Premises and Facilities Officer

Starters:

- 11.02.19 Rosie Wilson – Assistant Ranger (1-year fixed term contract)
 28.02.19 Molly Templar – Field Services and Estate Worker (3-year fixed term contract) – 22 hours per week until May

Seasonal staff: 01.04.19 to 01.11.19

- Liz Cwilewicz – Lynmouth
 Shelley Trace - Dulverton

Changes:

04.03.19 Yvonne Dale – Planning Officer

01.04.19 Martin Gillard – Historic Environment Officer (Mires) – 2 year extension to
31.03.21

Current recruitment:

Information Advisor (Dunster) – closes 18.03.19

Upcoming recruitment:

Exmoor Invasive Species Officer – fixed term contract funded post

Forestry Placement – fixed term through RFS

13. Any Other Business of Urgency

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 Annual Meeting of the Exmoor National Park Authority held on Tuesday, 5 March 2019 at 10.00am in the Committee Room, Exmoor House, Dulverton.

PRESENT

Mr R Milton (Chairperson)	
Miss A V Davis (Deputy Chairperson)	
Mr M Dewdney (Deputy Chairperson (Planning))	
Mrs L Blanchard	Mr E Ley
Mr R C Edgell	Mrs F Nicholson
Mr M Ellicott	Sir Richard Peek
Mr B Heywood	Mr S J Pugsley
Mr N Holliday	Mr B Revans
Mr J Hunt	Mr M Ryall
Mr I Jones	Mrs E Stacey
Mrs C Lawrence	Mr V White

An apology for absence was received from Mr J Patrinos, Mr B Peacock and Mrs P Webber.

120. DECLARATIONS OF INTEREST:

In relation to Agenda Item 7.2 – Application No. 6/10/18/116 – Proposed erection of detached annex to provide ancillary accommodation (Householder) – Dunstercombe, Old A39 Ellicombe, Dunster, Somerset the following interests were declared:

- Mrs C Lawrence declared a personal interest as County Councillor for the area of Dunster and as she was acquainted with the Applicant in his capacity of garage owner. Mrs Lawrence indicated she would withdraw from the meeting when this item was considered.
- Mr S Pugsley declared a personal interest as the applicant is an old school friend of his wife.

121. CHAIRPERSON'S ANNOUNCEMENTS: The Exmoor National Park Local Plan 2011 – 2031 was now a published document. The Plan is the statutory development plan and forms the basis for decisions on land use planning affecting Exmoor National Park.

122. MINUTES

- Confirmation:** The **Minutes** of the Authority's meeting held on 5 February 2019 were agreed and signed as a correct record.
- Matters arising:** There were no matters arising.

123. PUBLIC SPEAKING: See minutes 126 and 127 for details of public speakers.

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 M Dewdney, Deputy Chairperson (Planning).

APPEALS

- 124.** The Committee noted the **decision** of the Secretary of State for Housing, Communities and Local Government to dismiss the appeal against refusal to vary Condition 11 to allow for the apartments to be occupied as either a holiday let or as a principal residence dwelling – Applications 62/41/17/028 and 62/41/16/016 – Units A to D, Lynton Cottage Seaview Apartments, North Walk, Lynton.
- 125.** The Committee noted the **decision** of the Secretary of State for Housing, Communities and Local Government to dismiss the appeal against refusal to vary Condition 8 to allow for the apartments to be occupied as either a holiday let or as a principal residence dwelling – Applications 62/41/17/029 and 62/41/16/027 – Units E to J, Lynton Cottage Seaview Apartments, North Walk, Lynton.

DEVELOPMENT MANAGEMENT

126. Application No. 6/14/17/103

Location: Wintershead Cottages, Simonsbath, Somerset

Proposal: Proposed replacement of two semi-detached dwellings with a single farm manager's dwelling (Full)

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

Public Speaking:

- (1) A statement from Mr B Dinnis, the Applicant's agent, was tabled
- (2) Ms C Floyd, Applicant's daughter

The Authority's Consideration

The Committee noted the updated report and that Planning Officers recommended the application be refused due to the scale of the proposed replacement dwelling in relation to the dwellings being replaced; the removal of smaller and more affordable dwellings from housing stock within the National Park; and that the proposed windows and doors were not in keeping with the traditional form and character of the proposed replacement dwelling.

Having considered the application in detail, and taking into account its particular circumstances, the majority of the Committee considered that the proposed development would significantly enhance the landscape in this prominent position, and would therefore fulfil the primary purpose of Exmoor National Park Authority to conserve and enhance the landscape.

Members were also of the view that the existing dwellings had not originally been designed to provide affordable housing, but were built for a very specific agricultural purpose and were located in an exposed location some considerable distance from the nearest settlement. Whilst mindful of the need to protect affordable housing in the locality, the Committee felt the development site was in an unsustainable location to be considered for affordable housing.

For those reasons, it was the judgement of the majority of Members that the proposed development was not inconsistent with policy and that planning

permissions should therefore be granted, subject to the provision of an agricultural occupancy tie on the dwelling.

Taking into account the consultation period for the re-advertisement of the application would not expire until 8th March 2019, Members delegated authority to Planning Officers to formally issue the decision of Members following the expiry date and having regard to further comments that may be received in that timescale.

RESOLVED: To grant planning permission subject to the following conditions:

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.
2. The development hereby approved shall be carried out strictly in accordance with drawing numbers 297/001 Rev. B and 297/003 Rev. B, date stamped by the Local Planning Authority on 23rd January 2019, and drawing numbers 297/004 Rev. B and 297/006 Rev. B, date stamped by the Local Planning Authority on 29th January 2019.
3. Prior to any demolition works associated with the development hereby approved commencing, a nesting bird check shall be carried out by a suitably experienced ecologist/ornithologist immediately, to ascertain the presence of any nesting birds, including barn owls. Written confirmation by the ecologist/ornithologist who carried out the nesting bird check shall be submitted to the Local Planning Authority for written approval. If nesting birds, including barn owls, are discovered, then the demolition works shall be delayed until the chicks have fledged.
4. Prior to any demolition works associated with the development hereby approved commencing, a barn owl nest box, in accordance with the Barn Owl Trust specifications, shall be attached by an experienced ecologist/barn owl worker to a mature tree on the eastern boundary of the application site. It shall be retained in situ thereafter.
5. Prior to the commencement of the development hereby approved, a copy of a European Protected Species Licence granted by Natural England, or written confirmation from a licensed ecologist confirming that a license is not required for the approved development, shall be submitted to, and approved in writing by, the Local Planning Authority.
6. Prior to the commencement of the development hereby approved, a Bat Mitigation and Compensation Strategy, comprised of timing of works and number, type and location of roost compensation features, shall be submitted to, and approved in writing by, the Local Planning Authority. The Strategy shall be based on up to date survey information of potential roost sites. In summary, it is considered that mitigation measures will be comprised of providing alternative roosting provision for bats, minimising any potential disturbance to acceptable levels and maintaining the favourable conservation status of the species present. Recommended mitigation measures include: carrying out works under an ecological watching brief and providing alternative roosting provision for common pipistrelle bats within the approved dwelling, e.g., through use of integrated bat boxes/bat tubes or use of bat slates. Under no circumstances shall a breathable roofing membrane (BRM) be used to line the roof of the approved dwelling if bat roosting provision is provided in the roof. The development shall be carried out in

strict accordance with the approved Bat Mitigation and Compensation Strategy, and any mitigation or compensation features shall be retained and maintained thereafter.

7. Prior to the commencement of the development hereby approved, a detailed landscaping scheme, showing both hard and soft landscaping proposals, shall be submitted to, and approved in writing by, the Local Planning Authority. This shall include, where required, the planting of trees and shrubs including a planting schedule setting out species, numbers, densities and locations, the provision of screen walls or fences, the mounding of earth, the creation of areas of hardstanding, pathways, etc, areas to be seeded with grass, and other works or proposals for improving the appearance of the development. The scheme shall be carried out in accordance with the approved drawings not later than the expiry of the next planting season following commencement of the development, or within such other time as may be approved with the Local Planning Authority. The landscaped areas shall be subsequently maintained to ensure establishment of the approved scheme, including watering, weeding and the replacement of any plants, or areas of seeding or turfing comprised in the approved landscaping plans, which fail within a period up to 5 years from the completion of the development.
8. Prior to the commencement of the development hereby approved, detailed plans showing the finished ground floor levels of the existing dwellings and the approved dwelling shall be submitted to, and approved in writing by, the Local Planning Authority. The plans shall show the finished ground floor levels in relation to a fixed datum point. The development shall then be constructed in accordance with the approved finished ground floor level plan for the approved dwelling.
9. Prior to installation, samples of all finishing materials for the external walls and the roof of the dwelling hereby approved shall be submitted to, and approved in writing by, the Local Planning Authority. The development shall then be carried out in accordance with the approved samples, and shall be retained as such thereafter.
10. Prior to installation, details of the windows and doors (including the construction material and colour) to be installed in the approved dwelling shall be submitted to, and approved in writing by, the Local Planning Authority. The development shall then be carried out in accordance with the approved details, and shall be retained as such thereafter.
11. All external window and door frames to be installed in the dwelling hereby approved shall have a minimum 100 mm (4 inch) reveal from the outer face of the external walls, and shall be retained as such thereafter.
12. The roof of the dwelling hereby approved shall be constructed with exposed rafter ends with planted on gutter brackets. The gable barge boards shall be fixed to the purlins and wall plates such as to leave a gap between the exterior of the end gable walls and the barge boards of no less than 100 mm (4 inches). The roof shall be retained as such thereafter.
13. Prior to first occupation of the development hereby approved, two artificial swallow nesting cup shall be attached to the external wall surface under the eaves on the north or east elevation of the approved dwelling. They shall be retained in situ thereafter.

14. Prior to first occupation of the development hereby approved, one large open sided nest box, suitable for jackdaws, built to RSPB specifications, shall be attached to a mature tree on the western boundary of the application site. It shall be retained in situ thereafter.
15. Prior to first occupation of the development hereby approved, a permanent barn owl nesting provision shall be provided in the loft of the approved dwelling, in accordance with the design specification set out within Section 4.3.3 and Annex D of the Protected Species Survey, dated September 2018 and prepared by Richard Green Ecology. The barn owl nesting provision shall be retained in the loft of the approved dwelling thereafter.
16. The occupation of the dwelling hereby approved shall be limited to a person solely or mainly working, or last working, in the locality in agriculture (as defined in Section 336(1) of the Town and Country Planning Act 1990), or in forestry, or a widow or widower of such a person, and to any resident dependants.
17. Any gas, electricity, water, sewage, telephone and cabling services to the dwelling hereby approved shall be placed underground, and shall be retained as such thereafter.
18. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) 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 - G of Part 1, Class A of Part 2 and Classes A, B, E, F, H and I of Part 14 of the Schedule 2 of the Order.
19. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (or any Order revoking and re-enacting that Order with or without modification), no external lighting shall be installed on the dwelling hereby approved unless details have first been submitted to and prior written consent has been received from the Local Planning Authority. The external lighting shall then be installed and operated in accordance with the agreed details.

Mr B Revans joined the meeting.

Before the officer presentation, Mrs C Lawrence left the meeting room.

127. Application No. 6/10/18/116

Location: Dunstercombe, Old A39 Ellicombe, Dunster, Somerset

Proposal: Proposed erection of detached annex to provide ancillary accommodation (Householder)

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

Public Speaking:

- (1) Ms R Randall, Applicant's agent
- (2) Mr D Anderson, Applicant's architect
- (3) Mr D Merson, Applicant
- (4) Mrs S Stanbury, Applicant's Daughter
- (5) Mr P Merson, Applicant's Son

The Authority's Consideration

The Committee noted that Planning Officers recommended the application be refused as they judged that the proposal represented a separate unit of residential accommodation and that, even if Members judged it to be an extension to the original dwelling, its scale was disproportionate.

Following clarification by Planning Officers that the external floorspace of the proposed annex totalled 95sqm rather than 118sqm as detailed in the report, representing an increase of 28% on the original dwelling floor space, the majority of Members considered the scale of the proposed annex to not be excessive and noted that it was compliant with Policy HC-D15.

It was the judgement of the majority of Members, having considered the Officer presentation and heard from the applicant and his agents, that the proposed building should be viewed as ancillary accommodation, given that it was clearly subservient to the main dwelling. The Committee therefore resolved to grant planning permission for the application but requested that a condition be imposed to ensure the ancillary accommodation be tied to the main dwelling in perpetuity.

RESOLVED: To grant planning permission subject to the following conditions:

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.
2. The development hereby approved shall not be carried out except in complete accordance with the details shown the drawing submitted with the application and numbered 736.18.004 rev. B.2.
3. The window frames, doors and external joinery within the development hereby approved shall be timber and retained as such thereafter. The roof of the development hereby approved shall be externally clad with tiles to match that on the existing dwelling in terms of type, size, colour and appearance.
4. The development hereby approved shall not be used other than for purposes ancillary to the existing dwelling within the red line application site as shown on the approved plans. The accommodation hereby approved shall not be used as a separate dwelling and shall not be sold, let or otherwise disposed of separately from the existing dwelling within the red line application site.

Mr V White did not participate in the vote as he was not present during part of the officer presentation.

After the vote, Mrs C Lawrence returned to the meeting room.

128. APPLICATION DECISIONS DELEGATED TO THE CHIEF EXECUTIVE: The Authority noted the **decisions of the Chief Executive determined under delegated powers**.

129. SITE VISITS: There were no site visits to arrange.

5 March 2019

The remaining section of the meeting was chaired by Mr R Milton, Chairman of the Authority.

130. AUTHORITY MEETING SCHEDULE 2020

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

RESOLVED: To adopt a schedule of meetings of the Authority and its Committees for 2020 as appended to the report.

131. PERSONNEL UPDATE: The Authority noted the recent staff changes as set out on the Agenda.

132. ANY OTHER BUSINESS OF URGENCY: Members joined the Chairperson in formally thanking a number of Authority staff for their valuable contribution to the work of the Authority:

- Thomas Thurlow, Historic Buildings Officer, whom together with Jenny Cheshire of Historic England, delivered a very informative presentation on Listed Buildings and Conservation Areas, which enabled Members to gain a better understanding of this important area of planning.
- Dan James, Sustainable Economy Manager; Katrina Munroe, Economy Project Officer and Ailsa Stevens, Communications Officer; for their significant work on the English National Park Experience Collection, which culminated in a successful launch event at Dunster Castle on 27 February. The Officers collaborative work with local businesses has led to a suite of new experiences aimed at inspiring more international tourists to explore the extraordinary landscapes and culture of Exmoor National Park.

The meeting closed at 12:02 pm

(Chairperson)

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Application No: **6/8/19/101**

Grid Ref. 295706 138695

Applicant: Mr S Moore, 1 The Old Vicarage
Vicarage Court, Timberscombe, Somerset

Location: Allercott Farm, Allercott, Timberscombe, Minehead, Somerset

Proposal: **Proposed area for storing timber and associated equipment. Retrospective. (Full)**

Introduction: This application is brought before the Committee as under the approved Scheme of Delegation the officers recommendation is contrary to that of Timberscombe Parish Council.

Retrospective planning permission is sought for the creation of an area for storing timber and associated equipment at Allercott Farm, Allercott, Timberscombe. The site area lies approximately 890m south of Allercott farmstead and its existing built form, within the parish of Cutcombe and lies immediately adjacent to the boundary of Timberscombe Parish Council.

The site lies within open farmland and is bordered on the east and south (partial) sides by existing mature banks/hedgerows and on the north and west side by a post and wire fence erected as part of the development. Running adjacent to the south of the site is an unclassified road 4(d) and the existing access to the site has been widened by approximately 5m by removing the existing bank. The site measures approximately 46m at its widest point and 79m at its longest point and has been scraped back to the layer of shillet below to allow for a level area to be created. The site is gently sloping in a north-south direction and has been excavated, in parts, by approximately 100mm.

Consultee Response:

WEST SOMERSET COUNCIL: No comment received

SCC - HIGHWAY AUTHORITY: 15/01/19 - Further Consideration.

31/01/19 -

The proposal site sits off an unclassified unnamed public road. The immediate approach road to the site appears rural by nature and lightly trafficked with no apparent passing places.

It is the view of the Highway Authority that the current detail provided in support of the application is limited and as such we are unable to make an appropriate assessment for the submitted application. for the avoidance of doubt and in the interest of highway safety it is recommended that the applicant provide further detail to include the following prior to any further comment from the Highway Authority.

Clarity on the GFA specifically for storage purposes.

Current/Proposed visibility splays onto the public highway from the site.

Anticipated daily vehicle movements.

Type/size of vehicles (and attachments) associated with the proposal.

Traffic management plan to also include what direction the associated traffic will most

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likely be coming from.

ARCHAEOLOGIST - ENPA: No comment received

ECOLOGIST - ENPA: 15/02/19 -

The retrospective clearing of semi-improved grassland to provide an area for storing timber and associated equipment is unlikely to have had a significant effect on protected species breeding on the site, however, it will have resulted in the loss of foraging and commuting habitat for a number of protected species potentially using the site, such as bats, birds and badgers, and potential S41 NERC act species, including pollinators.

It is also not possible to tell from the photos within the case file how species-rich the grassland sward was and the local plant communities lost as a result.

There does not seem to be any compensation for the removal of the grassland and installed/proposed enhancements around the site to ensure the proposal adheres to the NPPF and local plan. I would therefore expect to see enhancement in the form of planting up of the proposed bank, using the excess top soil, with native and locally occurring wild flowers. The retained grassland strip within the sites boundary fence should also be managed to promote a species-rich sward.

CUTCOMBE PARISH COUNCIL: 21/02/19 - No Objection

TIMBERSCOMBE PARISH COUNCIL: 29/01/19 -

All approved the application

LANDSCAPE OFFICER - ENPA: 18/03/19 -

Proposal:

Proposed timber storage yard with associated equipment storage.

Site Context:

The proposed application is sited east of Couple Cross and to the south of the settlement of Timberscombe. It is on sloping ground at an elevation of 320m AOD, and is adjacent to the public highway. Existing roadside hedging provides some visual screening of the application site.

Landscape Character:

It is located in a landscape of undulating interconnected hills, typical of the Landscape Character Type (LCT) I - 'Wooded and Farmed Hills with Combes'. This is a landscape pastoral in character comprising of medium sized fields delineated by banked mixed species hedgerows. Skylines are a very prominent feature of this LCT and offer wide ranging views from the open hill tops. This is a site within very close proximity to sites of historic environment interest. The site is not in close proximity to any existing development in this location.

Visual Amenity:

The site is visible from sections of the adjacent public highway particularly at the access point to the site. The stacking and boxed storage of materials on the site further contributes to the visual impact of the development. It is noted that some visual screening of the development is provided by the existing roadside hedges.

This development has an impact on both the landscape character and visual amenity of

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this location by developing an isolated site in an open and rural location. The groundworks carried out to provide for suitable surfacing and site levels for this business use have had an impact on the surrounding landscape character and visual amenity.

The application details as submitted (site plan) do not specify the extent to which the site has been developed to date. Clarification on the scale and extent of the proposed yard and the proposed storage of materials during the course of the year needs to be provided for the whole of the application site in order for a full assessment of the impact to be established.

Public Response:

1 letter of objection

One public letter of representation has been received from an adjoining land owner. The neighbour objects to the application on the unsuitability of using the lane for commercial traffic, the safety aspects in relation to riders and walkers and the impact on the landscape character of the area.

Most Relevant Development Plan Policies:

Exmoor National Park Local Plan 2011-2031 (including minerals and waste policies)

GP1 – General Policy

GP4 – The efficient use of land and buildings

CE-S1 – Landscape and Seascape Character

CE-D1 – Protecting Exmoor's Landscapes and Seascapes

CE-S3 – Biodiversity and green infrastructure

CC-D1 – Flood Risk

SE-S3 – Business development in the open countryside

AC-D1 – Transport and Accessibility Requirements for Development

AC-D2 – Traffic and Road Safety Considerations for Development

AC-S3 – Traffic management and parking

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

Observations:

The main material planning considerations are considered to be the principle of development, the impact on the landscape character and appearance, the impact on protected species and habitats and the impact on the local highway network.

PRINCIPLE OF DEVELOPMENT

Policy SE-S3 of the Exmoor National Park Local Plan 2011 – 2031 (including minerals and waste policies) (the Local Plan) permits in principle proposals for the erection of new business premises in the open countryside where they redevelop existing employment sites.

The development includes the creation of an area for the storage of timber and associated equipment within open countryside. Policy GP3 of the Local Plan states that outside the named settlements the area is identified as open countryside where the focus

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of new build development will be on improving the sustainability of rural land-based businesses.

Policy SE-S3 of the Local Plan relates to business development in the open countryside. This policy seeks to provide opportunities and sets out the policy framework for new business development in the open countryside, through the extension or redevelopment of existing business sites or buildings, and the reuse of existing buildings in farmsteads or hamlets. It also aims to provide diversification opportunities for rural land-based businesses, which are businesses that manage the land in a way that conserves the National Park's special qualities. Rural land-based businesses can be defined as forestry or other businesses that manage the land for conservation and/or recreation which have benefits for health and well-being, among others. Rural land-based businesses must also be located in the open countryside due to the nature of their operations.

Clause 4 of Policy SE-S3 states that the erection of new business premises in the open countryside will only be permitted for the redevelopment of existing employment sites, where existing buildings are replaced with no significant increase in size, and enhancement to the site and/or its setting is incorporated into the proposals where necessary to deliver an overall acceptable scheme, which is consistent with local landscape character.

The location of the development is not an existing employment site that has been re-developed. The site is isolated and located away from other development. It is considered that the development, as carried out, causes an unacceptable level of harm to the landscape character of the area and is unlikely to be able to be improved to such a degree as to create an overall acceptable scheme, in this location.

The applicant states that both of the businesses run from the site are rural land-based businesses that contribute massively to the conservation of the local area. He also states that Mr Logs has been granted funding by the LEADER scheme due to its potential to create local employment and the money it feeds directly back into the sustainable management of local woodlands. Without this storage area for the timber the business will not be able to continue to grow and hit its employment targets. He further states that Moore's Fencing and Timber also provides local employment while encouraging the use of sustainable chestnut fencing, rather than that of tanted timber. Last year the business installed over 4000m of deer fencing in local woodlands in a forestry regeneration project together with agricultural fencing on local farms and it, too, will struggle to continue without use of this yard.

The applicant further states that all six bullet points within policy SE-S3 refer to the use or re-use of existing buildings rather than storage areas or hardstanding. Whilst this application does not seek to erect a new building and/or use/re-use an existing building it does seek to introduce a new business premises within open countryside.

The applicant has also stated that he believes the application should be considered under policy SE-S4 of the Local Plan. Policy SE-S4 relates to agricultural and forestry development and the applicant has set out within the application paperwork why the development accords with this policy. Policy SE-S4 states permission will be granted for new buildings, tracks and structures or extensions required for forestry purposes where:

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- a) it can be demonstrated that there is a functional need and its size and scale are commensurate with that need;
- b) the structure is designed for the purposes of forestry;
- c) in the case of new buildings, the site is related physically and functionally to existing buildings associated with the business;
- d) structures are sited appropriately in the context of local topography and of an appropriate design that responds to and reinforces landscape character in terms of size, scale, massing, layout, external appearance and materials;
- e) proposals do not generate a level of activity or otherwise detrimentally affect the amenity of surrounding properties and occupiers;
- f) appropriate measures are taken to ensure that proposals do not, including through the level of activity, have an adverse impact on biodiversity or cultural heritage or cause other unacceptable environmental impacts; and
- g) it can be demonstrated that opportunities have been taken to improve energy efficiency, reduce carbon emissions and minimise surface water run-off.

The application site is not located within a woodland nor associated with a specific woodland or its management. The applicant does not own a woodland holding although his application states that he does conduct forestry management as part of his business working practices. It is considered for the purposes of this policy the proposal does not constitute forestry development.

The development seeks to create an area for the storage of timber and associated equipment in a location that is not an existing employment site. The site is isolated and located away from other development as such; it is considered that it is not acceptable in principle.

IMPACT ON LANDSCAPE CHARACTER AND APPEARANCE

Policies CE-S1 and CE-D1 of the Local Plan seek to conserve, enhance and protect Exmoor's landscapes and seascapes. Policy CE-D1 states that development will be permitted where it can be demonstrated that it is compatible with the conservation and enhancement of Exmoor's landscapes and seascapes.

The site measures approximately 46m at its widest point and 79m at its longest point and has been scraped back to the layer of shillet below to allow for a level area to be created. The site is gently sloping in a north-south direction and has been excavated, in parts, by approximately 100mm. The applicant states that this site has been chosen carefully for a number of reasons:

- It is the only area on the farm, which has a natural hardstanding (shillet) very close to the surface, as well as being naturally level and in close proximity to a highway. These three factors together mean that the creation of a site here has minimal impact on the "landscape character of the area".
- Access to the site is very important. The existing gateway has been widened in order to allow easy access for Articulated lorries. There is no access for these lorries to the main farmstead due to a narrow drive, a neighbour's drystone wall and a telegraph pole. The only way to create access to the main farm would be the creation of a new driveway across two fields, which would cause an "unacceptable level of harm to the landscape

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character of the area”.

- The existing access road is used by the Forestry Commission as the main haulage route for removal of timber from Croydon woods. In the winter of 2017/2018, over 11,000 tonnes of timber (over 400 lorry loads/ ten years' worth of traffic for us) were extracted along this road; therefore, our yard would not have any noticeable effect on traffic levels or road conditions.
- The site is well hidden and can only be viewed from the road directly alongside it. It cannot be viewed from any dwellings or other buildings. The site is for the storage of timber; therefore, the predominant view from the road is that of timber stacks, a common occurrence in the local area.
- Whilst the original gateway has been widened by 5m by the removal of a bank, the soil from the site has been used to create over 1200m of new banks and therefore hedgerows in the surrounding fields, creating new habitat.

The site lies within open farmland and is bordered on the east and south (partial) sides by existing mature banks/hedgerows and on the north and west side by a post and wire fence erected as part of the development. Running adjacent to the south of the site is an unclassified road 4(d) and the existing access to the site has been widened by approximately 5m by removing the existing mature bank.

This Authority's Senior Landscape Officer has stated that the site is visible from sections of the adjacent public highway particularly at the access point to the site. The stacking and boxed storage of materials on the site further contributes to the visual impact of the development. It is noted that some visual screening of the development is provided by the existing roadside hedges.

This development has an impact on both the landscape character and visual amenity of this location by developing an isolated site in an open and rural location. The groundworks carried out to provide for suitable surfacing and site levels for this business use have had an impact on the surrounding landscape character and visual amenity.

It is considered that the works do not conserve, enhance or protect this part of Exmoor's landscape, the works are not compatible with the conservation and enhancement of this part of Exmoor's landscape, have no visual or character connection to any surrounding farmstead and will have an unacceptable impact on the character and appearance of the landscape and are, therefore, unacceptable and do not comply with policies CE-S1 and CE-D1 of the Local Plan.

It is also considered that the development is contrary to Paragraphs 170 and 172 of the NPPF which state that planning decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes and that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks.

IMPACT ON PROTECTED SPECIES AND HABITATS

Policy CE-S3 of the Local Plan relates to biodiversity and green infrastructure and states

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that the conservation and enhancement of wildlife, habitats and sites of geological interest within the National Park will be given great weight.

This Authority's Wildlife Officer has commented on the application and states that the retrospective clearing of semi-improved grassland to provide an area for storing timber and associated equipment is unlikely to have had a significant effect on protected species breeding on the site, however it will have resulted in the loss of foraging and commuting habitat for a number of protected species potentially using the site and that there does not seem to be any compensation for the removal of the grassland and installed/proposed enhancement around the site to ensure the proposal adheres to the NPPF and local plan. He adds two recommendations relating to the planting up of the proposed bank and the management of the retained grassland to promote a species-rich sward.

The applicant has stated that the material from the removal of the 5m of existing bank has been used to create over 1200m of new banks and hedgerows in the surrounding fields, thereby creating new habitat.

Through the recommendations and advice of suitably qualified professionals it is considered that the proposed development is unlikely to have had a significant effect on protected species and habitats and that these could be mitigated through the use of conditions to enable enhancement, in accordance with the NPPF, in the form of planting up of the proposed banks and the management of the retained grassland to promote a species-rich sward. The proposals therefore comply with policy CE-S3 of the Local Plan.

IMPACT ON THE LOCAL HIGHWAY NETWORK

Policies AC-S3, AC-D1 and AC-D2 of the Local Plan relate to traffic management and road safety considerations. Policy AC-S3 states that the approach to traffic management on Exmoor will take into account the needs of all users including pedestrians, walkers, cyclists, horse-riders, and disabled people and that the Exmoor Route Network will form the framework for traffic management in the National Park.

Policy AC-D1 states that in designing new development applicants should ensure that the design and details of highway works which are required for new development proposals are appropriate in scale to the development and contribute to the conservation or enhancement of the area and that where development is likely to generate significant levels of traffic, applicants will be required to prepare a Transport Assessment or Transport Statement, an air quality assessment where necessary, and a Travel Plan to ensure that the proposal delivers sustainable travel outcomes.

Policy AC-D2 states that in the determination of proposals for development the Exmoor Route Network will be considered to ensure that the capacity of the roads serving developments is adequate for the traffic likely to be generated. Policy AC-D2 also states that development which will cause unacceptable levels of traffic in terms of the environmental or physical capacity of the local road network, or would prejudice road safety interests, will not be permitted.

Somerset County Council Highways Authority have commented on the application and state that it is the view of the Highway Authority that the current detail provided in support

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of the application is limited and as such they are unable to make an appropriate assessment for the submitted application. They recommend that the applicant provides further detail including clarity on the gross floor area specifically for storage purposes, current/proposed visibility splays onto the public highway from the site, anticipated daily vehicle movements, type/size of vehicles (and attachments) associated with the proposal and a traffic management plan to also include what direction the associated traffic will most likely be coming from.

It is considered that insufficient information has been provided at this point to allow the Local Planning Authority to satisfactorily assess the likely impact of the development on the local highway network, as such, it is considered that the development does not accord with policies AC-S3, AC-D1 and AC-D2 of the Local Plan.

OTHER MATTERS

One public letter of representation has been received from an adjoining land owner. The neighbour objects to the application on the unsuitability of using the lane for commercial traffic, the safety aspects in relation to riders and walkers and the impact on the landscape character of the area.

Cutcombe Parish Council have commented and have no objection to the application.

Timberscombe Parish Council have approved the application.

CONCLUSION

For the reasons outlined above the development is considered to be unacceptable and not in accordance with the relevant development plan policies. The application is therefore recommended for refusal.

Recommendation:

for the following reasons

1. The proposed development site lies within open countryside that is not an existing employment site, is isolated and is located away from other buildings and is therefore contrary to Policy SE-S3 of the Exmoor National Park Local Plan 2011-2031.
2. The proposed development by virtue of its siting, position, and form, is considered to cause unacceptable harm to the scenic beauty and character of this part of the Exmoor National Park Landscape contrary to policies CE-S1, CE-D1 and SE-S3 of the Exmoor National Park Local Plan 2011-2031 and paragraphs 170 and 172 of the National Planning Policy Framework.
3. It is considered that insufficient information has been provided, at this point, to allow the Local Planning Authority to satisfactorily assess the likely impact of the development on the local highway network, as such, it is considered that the development does not accord with policies AC-S3, AC-D1 and AC-D2 of the Exmoor National Park Local Plan 2011-2031.

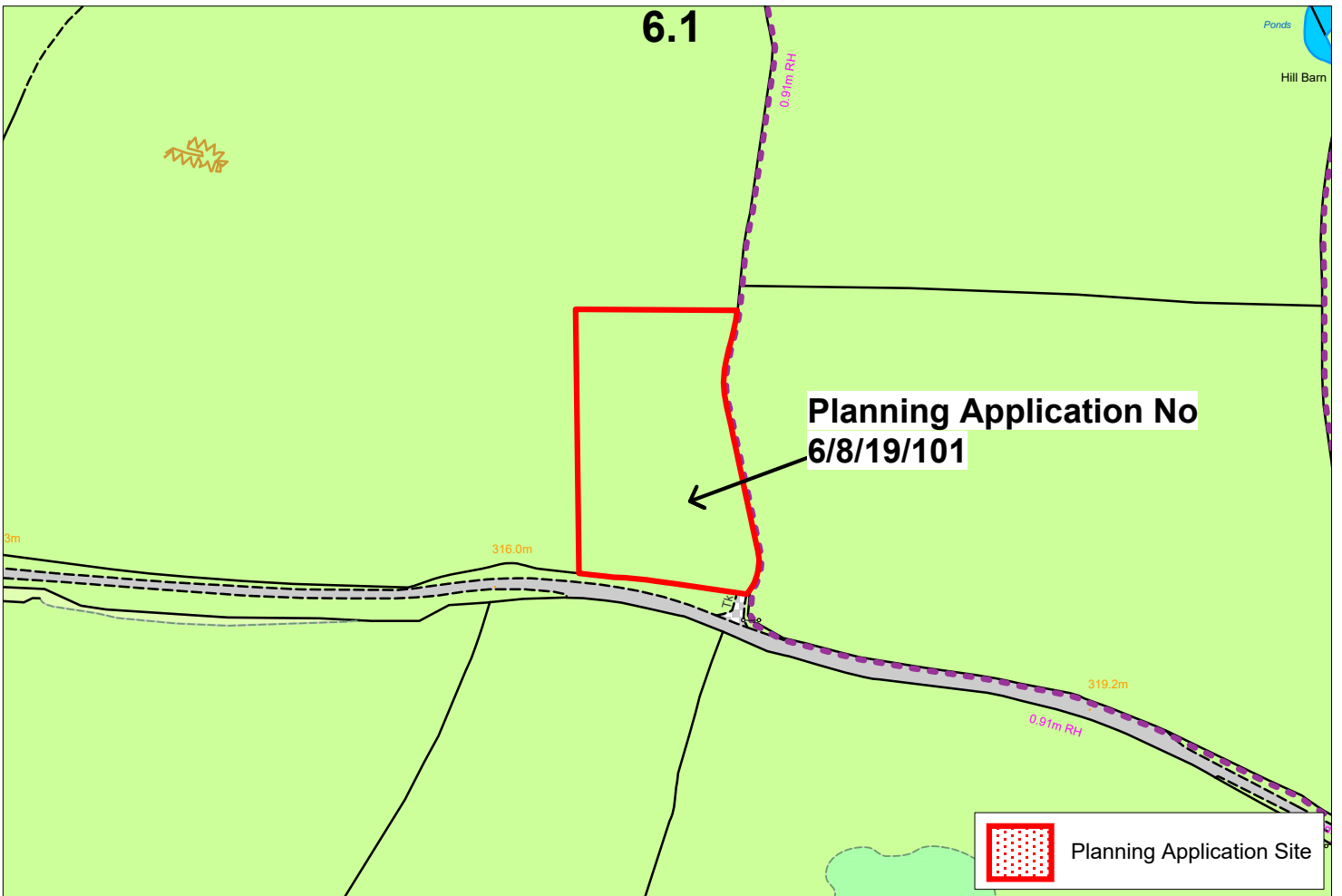
Notes to Applicant:

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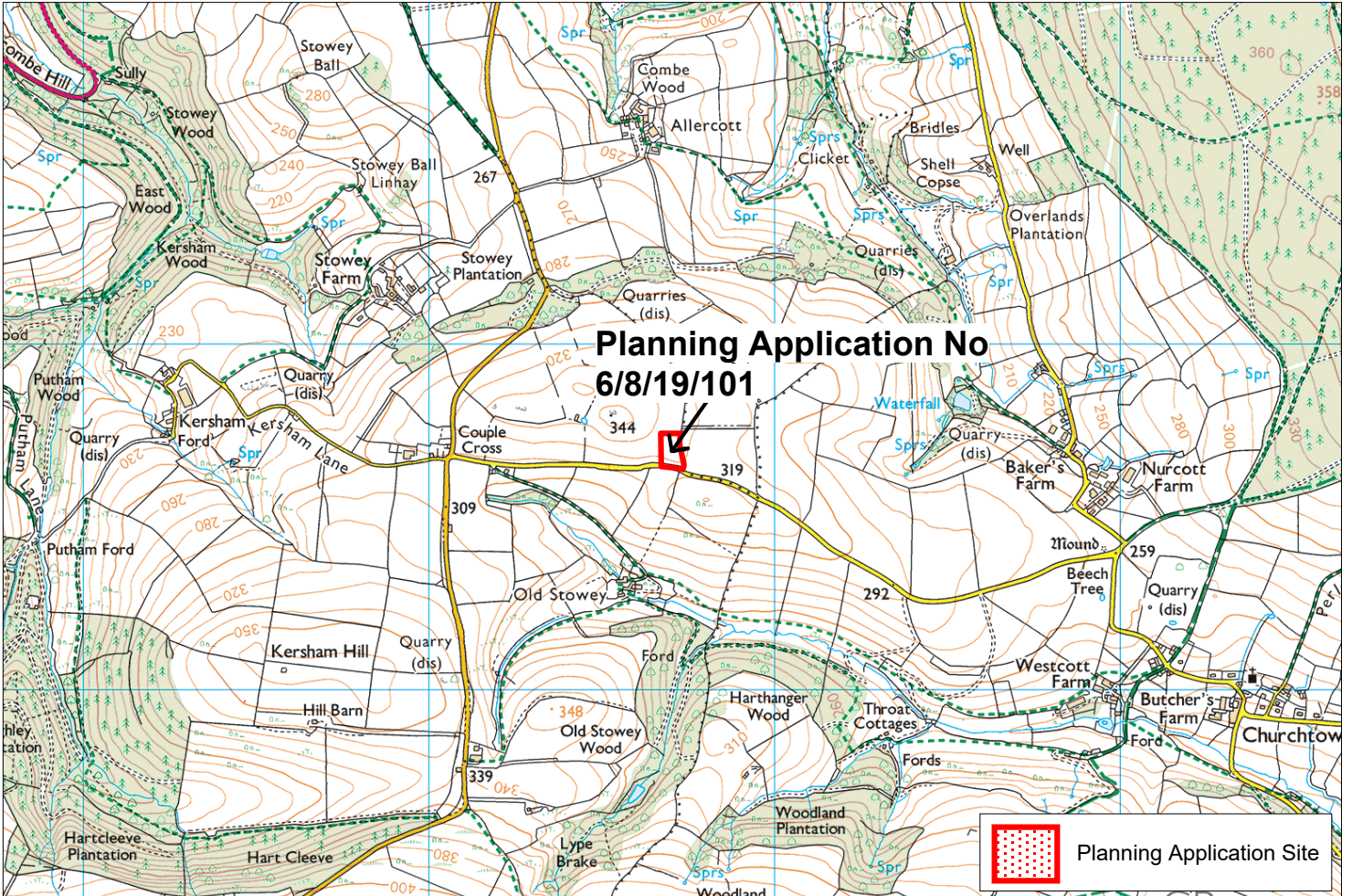
POSITIVE & PROACTIVE STATEMENT

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 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. However, in this instance the relevant planning considerations have not been addressed and the application has therefore been refused.



Site Map
1:2500

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Overview Map
1:20000

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EXMOOR NATIONAL PARK AUTHORITY MEETING

Application No: **6/10/18/113** Grid Ref. 299045 143332

Applicant: Mr S Rogers, National Trust, Dunster Castle
Castle Hill, Dunster, Somerset

Location: Water Mill Tea Rooms, Mill Lane, Dunster, Somerset

Proposal: **Proposed extension of tea room. (As per amended plans and additional information). (Full)**

Introduction: The planning application proposes the extension of the Water Mill Tea Rooms, Mill Lane, Dunster.

The application site lies at the east end of Mill Lane, off West Street in Dunster. The existing building is a traditional rubble stone built barn, which was formerly associated with the mill that lies to the east of the site. Mill Lane passes to the northern side of the barn, where access can be gained to the upper floor of the building, before the road terminates and there is access to the water mill building.

The grounds of Dunster Castle lie to the north on the opposite side of Mill Lane. The River Avill lies to the south and the more recent residential development at Mill Gardens lies to the west. The application site is in Dunster Conservation Area.

Planning permission was granted in 1989 under application reference 6/10/89/103 for the conversion of the barn to a tea room and toilets for Dunster Water Mill. The tea room occupies the upper floor of the building and outside seating is accommodated in the grounds of the building. The lower floor of the barn accommodates the kitchen and store facilities.

The papers submitted with the application explain that the applicant, the National Trust, recovered the lease to the tea room several years ago and are now responsible for managing and running the facilities daily. The papers explain that the previous tenants only opened the building during the busy times of year whereas the applicant wishes to open for 363 days of the year, i.e. when the Castle is open. The papers advise that the current offering of 31 indoor seats in the building is impractical and inadequate and that the applicant has identified the need to increase the number of covers to service demand, improve the kitchen facilities and provide universal access for all visitors to essential facilities within the building.

The proposal is to provide a two-storey extension to the south west side of the existing building, toward the river. The extension would be provided with a dual pitch roof, with a valley formed with the roof of the existing building. The roof would be clad with natural slate, with roof lights installed on the north east roof slope, which faces toward the existing building roof. The elevations would be timber clad with stone course quoins. There would be large areas of glazing to the south west elevation and the door and window frames would be timber.

At the lower floor, the proposed extension would accommodate additional kitchen and store facilities, a lobby and dining area with approximately 18 seats. The upper floor of the extension would comprise a wash and kitchen preparation area and a dining area with approximately 32 seats in addition to the existing dining area. An all ability access toilet is proposed and the access to the upper floor from Mill Lane is proposed to be altered to provide a ramp access. That access would also lead to the grounds of the building, with access to the lower floor.

Consultee Response:

DUNSTER PARISH COUNCIL: Comments November 2018 – No objections.

Comments February 2019 – Dunster Parish Council would support this application on two conditions.

Condition 1 - Staff must be made to use National Trust Car Park and must not use public parking.

Condition 2 - An independent economic impact survey is carried out.

ENVIRONMENT AGENCY SOUTH WEST: Comments November 2018 – Environment Agency position

We have no objection to the proposed development as submitted providing that a condition is included on any permission granted to ensure the implementation of the submitted Flood Risk Assessment (FRA). The reason for this position and suggested wording for the condition is provided below.

Reason – The site is located partially within flood zones 2 and 3 identified by the environment agency flood maps as having a medium to high probability of flooding. The submitted FRA has adequately assessed the risks to the development and suggested suitable mitigation measures to ensure the development remains safe from flooding over its lifetime in line with the National Planning Policy Framework (NPPF).

Condition – Implementation of the FRA

The development permitted by this planning permission shall be carried out in accordance with the approved Flood Risk Assessment (FRA) reference '0656 DUNSTER, Water Mill Tea Room' and the following mitigation measures detailed within the FRA:

- The proposed development shall be built on land with existing levels greater than 25.96mAOD. There shall be no development on land below this level.
- Flood resilience measures shall be provided to the building up to a level of 26.26mAOD (25.96mAOD plus 300mm identified on page 1 in the FRA).

Reason – To ensure that the development remains safe from flooding over its lifetime.

Advice – Flood Resilience

In view of the potential flood risks in this locality, we would advise that any developer of this site gives consideration to the use of flood resilient construction practices and materials in the design and build phase. Choice of materials and simple design modifications can make the development more resistant to flooding in the first place, or limit the damage and reduce rehabilitation time in the event of future inundation.

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Detailed information on flood proofing and mitigation can be found by referring to the CLG free publication 'Improving the Flood Performance of New Buildings'. Please see the link below:

http://www.planningportal.gov.uk/uploads/br/flood_performance.pdf

It would also be advisable for the applicant to prepare a flood plan which outlines how the business will respond to a flood. Further advice on this can be found in the following link:

<https://www.gov.uk/prepare-for-a-flood>

Comments February 2019 – Following review of the revised plans, we maintain our previous position of no objection providing that a condition is included on any permission granted to ensure the implementation of the submitted Flood Risk Assessment (FRA).

I refer to our previous response (dated 20 November 2018) which provides the reason for the position, suggested wording of the condition and advice on flood resilience for your information.

HISTORIC BUILDINGS OFFICER - ENPA: November 2018 – The proposed scheme has been developed over a long pre-application process with involvement from myself, the planning officer and Historic England. Whilst the tea room is not a listed building the site is very vulnerable to such a development as it lies within the setting of the Grade II*listed watermill, the Grade I listed Castle, and the Scheduled Ancient Monument of Dunster Castle Motte and bailey. It also sits on the boundary of the Grade II*Registered Park and Garden. The design and access statement erroneously states that the site is outside Dunster Conservation Area when it is in fact within the Conservation Area.

The earlier iterations of the scheme were felt to be too large in both scale and mass and risked dominating the site. The submitted application is significantly scaled down from what was initially proposed and is very different in form and appearance. The proposed building now sits much more comfortably with its surroundings and I do not believe it will cause degradation to the setting of the surrounding heritage assets.

Should the application be approved I would seek to condition the finish/appearance of the timber cladding, stone work and slates by submission of samples prior to commencement. The 3D rendering of the building also shows non-flush fitting rooflights to the central valley, these will need to sit flush with the roof surface.

WILDLIFE CONSERVATION OFFICER - ENPA: No comment received

NATURAL ENGLAND: Comments December 2018 – SUMMARY OF NATURAL ENGLAND'S ADVICE

European designated sites - the Exmoor and Quantock Oakwoods Special Area of Conservation (SAC)

Information is required i.e. a Habitat Regulations Assessment (HRA), to demonstrate that the requirements of Regulations 63 and 64 of The Conservation of Habitats and Species Regulations 2017 have been considered by your Authority.

WESSEX WATER AUTHORITY: Comments November 2018 – Wessex Water has no objections to this application and can advise the following:

New drainage and water supply connections

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Applications for extensions do not usually require a new connection to the public water supply mains. Your builder and plumber will explain how your existing arrangements may be altered to accommodate any new water supply requirements subject to available capacity.

The planning authority will need to be satisfied with your private package treatment plant arrangements which will be subject to building regulations.

What to do with rainwater from new driveways and roofs

Rainwater running off new driveways and roofs will require consideration to provide the best solution for the local environment. Rainwater may already connect to our existing foul or surface water networks. If you or your builder believe rainwater connects to the foul water network this should be disconnected if possible and an alternative method of disposal considered; soakaways where possible or connection to a watercourse or surface water sewer. Rainwater flows from hard surfaces running via pipes outside of your property boundary should not be permitted to increase and be reduced, where possible, to reduce local flood risk. This can be achieved by soakaway (where ground conditions are suitable) or slowing flows down within your property with the use of rain butts, permeable paving and rain gardens.

What to do if there is a public sewer or water main close to the proposed extension

We do not permit the building over of public water mains or in many instances where affected sewers are greater than 300mm diameter. This is to protect both property and services to our customers.

According to our records there are no recorded public sewers or water mains within the red line boundary of the development site. Please refer to the notes on the attached map for advice on what to do if an uncharted pipe is located.

JOINT COMMITTEE OF THE NATIONAL AMENITY SOCIETIES: No comment received

HISTORIC ENGLAND: Comments November 2018 – This application is for the extension of the building currently used as the National Trust tea room for Dunster Castle. The building is situated on the edge of Dunster Castle's park, in a location which is both visually and historically sensitive due to its proximity to important heritage assets such as the scheduled ancient monument of the Castle, the grade II* registered park and garden and the grade II* listed Castle Mill. The tea room is a conversion of a modest traditional barn which was formerly associated with the mill, and stands close to the river in an edge of village location in between the historic complex of the mill and more modern housing to its west.

We have been involved in extensive pre-application discussions with the National Trust regarding the tea room's extension. During this process, the design and size of the extension has been significantly altered to address concerns expressed by Historic England and National Park officers at its potential landscape and heritage impact.

Whilst still representing a sizeable extension to a modest building, its footprint and massing has been considerably reduced in the process of negotiations to avoid it becoming too dominant in relation to the original building. In addition, its design and materials have been amended to sit more comfortably within the historic mill complex and harmonise better with its rural surroundings in more long-range views of the site.

As a result, our concerns regarding the proposal's heritage impacts have generally been allayed in the scheme that is now submitted. However, we note the comments of the Environment Agency regarding the need for incorporating flood resilience into the construction of the lower levels of the building. We suggest that, prior to determination of this application, your Authority investigates whether this requirement is likely to result in any significant changes to the building's design or materials, which would require amended plans.

We would concur, though, with the comments of the National Park's Historic Buildings Officer regarding the need for careful selection and detailing of materials to retain the sense of a vernacular building (including reviewing the stone coping for the proposed new walls adjacent to the entrance to the tea room, where a more locally-typical detail could be used). We are happy to leave the approval of such details to your Authority's heritage specialist.

Recommendation

Historic England has no objection to the application on heritage grounds and we consider that the application meets the requirements of the NPPF, in particular paragraph numbers 190 and 192.

Your authority should take these representations into account in determining the application. If there are any material changes to the proposals, or you would like further advice, please contact us. Please advise us of the decision in due course.

WEST SOMERSET COUNCIL: No comment received

SCC - HIGHWAY AUTHORITY: Comments November 2018 – Standing advice applies.

Comments February 2019 – Further to your email regarding the above.

As you are aware, the Standing Advice document provides information on standards of acceptability for planning applications. It is therefore the LPA's prerogative to interpret the document and determine if an application does not meet the appropriate criteria then it can be refused based on the information in the document.

If the application were to go to Appeal, then the standing advice document would form part of the LPA's appeal statement/case.

Public Response:

12 letters of objection 2 letters of support

12 letters of OBJECTION have been received. The concerns raised include:

- The proposal represents significant development in a predominantly residential area.
- Concern regarding impact on wider village and businesses – people from the Castle will no longer visit those businesses.
- Seeks condition that would require the National Trust car park to close in winter months so visitor also visit the village.
- There are a number of erroneous statements in the Design and Access Statement – section 2.1 says the site is outside the Conservation Area, for example.
- The parking area within the site will be reduced.
- The proposal is not generally supported.
- The development with 160% increase will take trade from the village.
- Visitors to the Castle have increased from 110,000 in 2009 to 210,000 in 2018 – this is

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without a café facility to the scale proposed, so the applicant can manage without the proposal.

- This would create a super-sized tea room, dwarfing even the largest established cafes in the village. The increase in covers of 50 is not modest.
- If this were in the High Street it could be seen as normal competition, but not in this location away from most other businesses.
- Reference is made to the outcome of the National Trust's own economic impact study carried out in 2009 and repeats concern that with the development proposed people will not visit the village nor leave the castle grounds. The survey advised that a café at the Castle grounds would take trade away from the village.
- Concern regarding economic impact on the village and its viability and vitality.
- Concern regarding parking arrangement and difficulty with parking already in the local streets and public car park, which this proposed would make worse.
- Design and scale concern with the extension proposed.
- There has not been sufficient engagement with proposals locally.
- Concern expressed regarding hours of operation.
- Dunster already has 14 food establishments and these can meet the needs of visitors to the Castle.
- The extension is for 50 additional indoor covers and would take the facility to a 180 seater (80 indoor and 100 outdoor) – equivalent to three normal sized tearooms, sited in a largely residential area away from the heart of the village.
- There is significant distort in relationship the village and Castle – an independent economic impact survey is required.
- Adverse impact on local economy – Dunster could end up looking like a ghost town.
- The proposal would not have a "traffic neutral" impact as claimed. The proposal will result in the loss of a parking space and at the same time increase parking demand with 50 extra covers and employing upto 5 extra staff.
- There is already serious parking issues on the nearby roads.
- Adverse social impact on the village.
- Over commercialism of a grade one listed building.

2 letters of SUPPORT have been received. The comments include:

- The proposals would benefit those who visit the Castle and village alike.
- Proposal provides all ability access to the existing facility, which currently does not.
- The extension will make a huge difference, especially during the winter months as the majority of café are shut.
- Comments that the writer has room a tea room and shop for almost 4 years and that, over that time, they have seen consistent and significant growth despite wider challenging economic environment. It is considered that the Castle has a positive impact on their trade.
- Additional covers, when considered across all of the eateries in the village is a relatively low percentage.
- Positive impact on employment.
- Pleased to see the proposed extension is fully inclusive and accessible for all.

RELEVANT HISTORY

13266	Proposed erection of 415/240 volt distributors		
	Deemed	Approved	24 September 1951
	Same Site		

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6/10/78/006LB	Proposed restoration of Dunster Mill, Dunster Castle and machinery the use thereof for the production of flour and the eventual opening thereof to the public as described in the plans and drawings submitted, as amended by plans received on 23 June 1978, the schedule of works received on 21 August 1978 and revised 1/2500th site plan received on 1 September 1978	
Full	Approved	06 October 1978
	Same Site	
6/10/89/103	Proposed conversion of barn into tea-room and toilets at Dunster Water Mill, Dunster, Minehead as described in the plans and drawings submitted, as amended by plan 5349.4B received 4 April 1989	
Full	Approved	04 April 1989
	Same Site	

Most Relevant Development Plan Policies:

NATIONAL PARK PURPOSES AND THE DUTY are as follows:

1. Conserve and enhance the natural beauty, wildlife and cultural heritage
2. Promote opportunities for the understanding and enjoyment of the special qualities of national parks by the public

When national parks carry out these purposes they also have the Duty to:
Seek to foster the economic and social well-being of local communities within the national parks.

The key planning policies are detailed below.

EXMOOR NATIONAL PARK LOCAL PLAN 2011-2031

GP1 Achieving National Park Purpose and Sustainable Development
GP3 Spatial Strategy
GP4 The Efficient Use of Land and Buildings
GP5 Securing Planning Benefits – Planning Obligations
CE-S1 Landscape Character
CE-D1 Protecting Exmoor's Landscapes and Seascapes
CE-S2 Protecting Exmoor's Dark Night Sky
CE-S3 Biodiversity and Green Infrastructure
CE-S4 Cultural Heritage and Historic Environment
CE-D3 Conserving Heritage Assets
CE-S5 Principles for the Conversion or Structural Alteration of Existing Buildings
CE-S6 Design & Sustainable Construction Principles
CE-D4 Extensions to Buildings
CC-S1 Climate Change Mitigation and Adaption
CC-D1 Flood Risk
CC-D5 Sewerage Capacity and Sewage Disposal
HC-S6 Local Commercial Services and Community Facilities
HC-D18 Local Commercial Service Provision
RT-S1 Recreation and Tourism

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AC-S1 Sustainable Transport
AC-D1 Transport and Accessibility Requirements for Development
AC-D2 Traffic and Road Safety Considerations for Development
AC-S3 Traffic Management and Parking
AC-D3 Parking Provision and Standards

The National Planning Policy Framework is a material consideration.

The site is within a Conservation Area where there is a requirement to ensure that any development preserves or enhances the character or appearance of the area, as embodied in Section 72 of the Planning (Listed Buildings and Conservation Area) Act 1990.

When making affecting the setting of a listed building, a local planning authority must have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses (sec. 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 applies).

Observations:

Planning decisions need to be taken in accordance with policies of the Development Plan unless planning considerations indicate otherwise.

The main planning considerations are considered to be whether the principle of extending the existing commercial facility is acceptable, whether the proposal is acceptable in terms of its scale and design, the impact of the proposal on heritage assets including the setting of listed buildings and the scheduled ancient monument of the Castle and the character and appearance of the conservation area, impact on important wildlife interests, impact residential neighbours amenity, flood risk and highway safety. These matters are considered below. The need for an impact assessment is also discussed.

Policy GP1 advises that, among other things, proposals for new development will demonstrate that they are consistent with the National Park's legal purposes and duty and particular attention will 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; the impact on the character and setting of the site and/or buildings; supporting the function and resilience of communities by retaining and strengthening their services and facilities, protecting their safe attractive public places and employment opportunities and supporting the health and socio-economic wellbeing of local communities.

Policy GP3 and the spatial strategy aims to ensure that communities across the National Park continue to thrive so that they are economically resilient, environmentally sustainable, socially mixed and inclusive.

In accordance with GP3, development proposals should ensure that the scale of development is proportionate to the settlement size and reflects the capacity of each settlement to accommodate new build development; positively responding to the surrounding landscape character, settlement form and pattern, and avoiding areas at risk of flooding.

Under GP3, in villages, such as Dunster, development should contribute to and provide

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opportunities to address locally identified needs for housing and employment and sustain core services and facilities within these communities. New building development for business premises and community services and facilities will be acceptable where it is well related to existing buildings in the settlements.

Policy RT-S1 refers to recreation and tourism and advises that opportunities to provide high quality, inclusive visitor experience on Exmoor through a diverse range of recreation and tourism facilities that actively enhance the understanding and enjoyment of the National Park's special qualities will be encouraged, where this, among other things, accords with the following:

- There are no unacceptable adverse effects on the natural and historic environment;
- They contribute towards a sustainable future for Exmoor's local economy and communities;
- They respond to opportunities to improve the quality and viability of existing recreation and tourism business, through appropriate restoration, extension, expansion or diversification.
- They are of a scale compatible with their location and setting.

PRINCIPLE

Local commercial services and community facilities in settlements on Exmoor include those defined by the following use classes:

- a) A1-A5: includes local commercial services that serve Exmoor communities and visitors to the National Park and includes shops, public houses, cafés, restaurants and takeaways;
- b) D1: non-residential institutions such as health centres and libraries; and
- c) D2: assembly and leisure, for example, sports and recreation facilities.

The existing café is therefore considered to be a local commercial service under the Exmoor National Park Local Plan.

Policy HC-S6 of the Local Plan, which relates to local commercial services and facilities, advises, among other things, that the provision of new or extended local commercial services and community facilities will be supported where it can be demonstrated that they:

- a) will benefit the local resident community and the needs of visitors; and
- b) are of a scale and location appropriate to the community they serve.

Policy HC-D18 refers to local commercial service provision and advises that proposal for new build, extensions or change of use of buildings for local commercial service provision within the named settlements will be permitted where:

- a) the proposed location contributes to the overall vitality of the settlement and the local economy;
- b) they will not adversely affect the locality, National Park, or the amenity of nearby residents as a result of traffic or parking; and
- c) if required by the National Park Authority, an impact assessment has been submitted, the scope of which has been agreed prior to submission.

HC-D18 also advises that extensions to existing local commercial services will be permitted in accordance with policy CE-D4 Extensions to Buildings.

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Policy CE-D4 advises extensions will be permitted where they complement the form, character and setting of the original building, is appropriate in terms of scale and massing, the roofline respects the form and symmetry of the original building and bat roosts are maintained or replaced. Extensions to traditional buildings should reflect and sustain the historic significance, character and appearance of the original building.

Dunster is a village under the spatial strategy of the Local Plan. The existing building use is as a café and the proposal is to extend that existing facility. The application site lies within the built up area of the settlement. Residential properties, a guesthouse and the visitor attraction of Dunster Castle and Mill lie adjacent to the site.

The overarching principle of development, which is the extension of a traditional building within a village settlement, to enlarge the existing café, is considered to be acceptable under policy HC-D18.

Whether matters such as the scale and design of the proposal, its highway impact and impact on amenity is considered to be acceptable is considered further in the sections below.

DESIGN AND SCALE

Policy CE-S6 requires that development proposals deliver high quality sustainable designs that conserve and enhance the local identity and distinctiveness of Exmoor's built and historic environment.

Policy CE-D4, which relates to extensions to buildings, also requires, among other things, that extensions to traditional buildings reflect and sustain the historic significance, character and appearance of the original building through sensitive design and use of materials. Extensions must also be appropriate in terms of scale and massing.

The papers submitted with the application explain that the applicant has identified the need to increase the number of covers to service demand. The details explain that the entire Dunster Castle site is now fully open for 363 days of the year and visitor numbers in the colder months are increasing. The applicant wishes to provide some warm, indoor seating for those that wish to visit the existing tea room, which is considered to be cramped, with only 31 indoor seats. The applicant explains that the wet or cool weather in the summer months can also cause problems, as demand is high, but there is limited shelter or warm seating.

The existing building is a traditional sandstone barn, with a main two storey element and single storey attachment. The building is identified as a "positive" building in the Dunster Conservation Area Appraisal Document, adopted 2018.

The application for the extension follows extensive pre-application discussions with Historic England and officers of the National Park Authority. During that process, the design and size of the extension has been significantly altered and reduced to address concerns raised by Historic England and National Park officers.

The proposed extension is two storey and this would encompass and build over the existing single storey lean to of the building to the south west side.

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The proposed extension, in the context of the existing building and, although considerably reduced from that initially considered at pre-application stage, is significant. The existing building floor space is approximately 130 square metres and the proposed extension would add approximately 124 square metres.

The proposed extension would sit below the existing barn, being approximately 0.5 metres lower to the ridge of the roof. The footprint of the extension would be similar to that of the two storey element of the existing building and a pitched roof running west/east reflects the existing building and requires the formation of a central valley gutter, linking the existing building and the extension.

The gable width to the extension is similar to the existing building and the form of the extension is considered to reflect the historic character of the existing building.

High quality natural materials are proposed in the extension, with timber framed windows, doors and external joinery. Natural stone to the edges/corners of the extension reflects that used on the main building. The use of timber boarding to the extension, the step down in height and the double span roof helps to mark the building as an extension, as well as softening the visual bulk of the building. The design and materials, as amended, are considered to sit more comfortably with the building and the historic mill complex, as well as harmonise better with its rural surrounding in more long-range views of the site. Historic England and the Historic Buildings Officer are content that the design of the extension is appropriate.

While the proposal represents a relatively large extension to the existing building, the design of the extension is considered to reflect and respond to the traditional character and appearance of the main building. The extension is large in relation to the existing barn, which brings the risk of the development becoming dominant and detracting from the significance, character and appearance of the existing building by virtue of in appropriate scale and massing. However, the form of extension, with dual pitch roof and lower overall height, its proportions and use of materials in relation to the existing barn and site, help ensure that the extension is recessive. In addition, the building has relatively large grounds and the extension as proposed, in this context, is considered to be of an acceptable scale and mass in relation to the existing building and site, and the proposal is considered to respond to the character and appearance of the building, with the original building likely to remain dominant and legible.

In this regard the proposal is considered to satisfy policies CE-S6 and CE-D4.

HERITAGE ASSETS

In this case, the site is considered to be historically significant and sensitive. The application site is situated on the edge of Dunster Castle's park and lies close to important heritage assets such as the scheduled ancient monument of the Castle, the grade II* registered park and garden, the grade II* listed Castle Mill and grade II listed building at 7 Mill Lane. The site also lies in Dunster Conservation Area.

Local Plan policy CE-D3 (conserving heritage assets) advises that development affecting a heritage asset and its setting should, among other things, demonstrate a positive contribution to the setting through sensitive design, promote understanding and avoid unacceptable adverse effects. Policy CE-S4 advises that where development proposals

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will lead to substantial harm to, or total loss of significance of, a designated heritage asset, permission will be refused.

Policy CE-D4 is concerned with extensions to buildings more generally and advises that extensions should, among other things, complement the form, character and setting of the original building, reflect and sustain historic significance and ensure architectural interest, historic fabric and features are conserved and enhanced.

The National Planning Policy Framework (NPPF) advises that (paragraph 192), in determining planning applications, local planning authorities should take account of:

- a) The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) The desirability of new development making a positive contribution to local character and distinctiveness.

Paragraph 193 of the NPPF advised that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation, and the more important the asset, the greater the weight should be. Any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification (paragraph 194).

Paragraph 196 advises 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.

Historic England has been extensively involve in pre-application discussions for this proposal. This has brought about changes to the design and scale of the proposal, which has been amended and reduced as a result of those discussions.

Historic England advise that as a result of these changes, the concerns raised during those pre-application discussions regarding the proposal's heritage impacts have generally been addressed. Historic England reflect that the comments of the Environment Agency, through this application, may require changes to the building design to address floor level requirements. This matter has subsequently been raised and it has been confirmed that the proposed floor level would not need to alter because this meets the requirements of the Environment Agency.

Historic England advise that they have no objection to the application on heritage grounds and they consider the application meets requirement of the National Planning Policy Framework, in particular paragraph numbers 190 and 192.

The Historic Buildings Officer considers that the proposed building sits more comfortably with its surroundings and that it would not cause degradation to the setting of the surrounding heritage assets. The officer has recommended conditions for planning permission, should that be granted.

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While some local objection has been received in relation to the appearance of the proposed development and its impact on the locality, in terms of the heritage considerations and impact of the proposal, significant weight is given to the comments of Historic England and the Historic Buildings Officer.

The proposed development is considered to have an acceptable impact on the setting of the important heritage assets to the site, including the scheduled ancient monument of the Castle, the grade II* registered park and garden, the grade II* listed Castle Mill and grade II listed building. The proposal would provide an improved, more inclusive facility with all abilities access. The papers explain that the development would provide an extra full time job and 3 additional part time jobs.

The proposal, because of its design and appearance is considered to preserve the character and appearance of the Conservation Area, thereby satisfying the duty under Section 72 of the Planning (Listed Buildings and Conservation Area) Act 1990.

While the development is considered to have an acceptable impact on the heritage assets, it could be considered that there is nonetheless some harm by virtue of the introduction of the new development into the setting. However, that harm to the heritage assets if it does exist, by virtue of the proposed development, is considered to lie at the low end of less than substantial harm. While small, that harm, in accordance with the NPPF, remains of importance and this must be given great weight in the decision making. There is public benefit in providing the extension, which is considered to improve accessibility of the facility and bring economic benefit to the locality. In accordance with paragraph 196 of the NPPF, considering the limited harm caused to the heritage asset, with the public benefits outlined, the public benefits of the proposal are judged to outweigh the minor harm caused to the heritage assets.

The local distinctiveness, cultural heritage and historic environment of the locality is considered to be conserved through the development and the proposal is considered to comply with policies CE-S4 and CE-D3 of the Local Plan.

WILDLIFE INTERESTS

The application site is within 5km of the Exmoor and Quantock Oakwoods Special Area of Conservation (SAC) and 200 metres of the Dunster Park and heathlands Site of Special Scientific Interest (SSSI). The site also lies adjacent to the River Avill, which is a Local Wildlife Site.

An Ecological Impact Assessment report produced by Helix Ecology has been submitted in support of the application. The report concludes that the existing building is an important roost site for three species of bat including a significant maternity colony of soprano pipistrelle and a second maternity colony of common pipistrelle, and small number of serotine.

The report advises that, in the absence of mitigation, the proposed development would substantially impact on bat roosts as well as the ecological functionality of the River Avill as a wildlife corridor for protected species such as bats and otters. Of prime consideration is the impact of increased light pollution, particularly at dusk.

A European Protected Species Mitigation licence for bats would need to be obtained from

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Natural England, should planning permission be granted.

The submitted ecology report recommends that a condition of planning permission should be that key aspects of the proposed mitigation, compensation and enhancement measures are detailed in an Ecological Management Plan produced prior to the start of the development.

Natural England have advised that the proposed development will not damage or destroy the interest features for which the Dunster Park and Heathlands SSSI has been notified. Natural England, therefore, have no objection.

Although the site is 5km away from the Exmoor and Quantock Oakwoods SAC, the Wildlife Officer has highlighted that Barbastelle bats pass through the application site and considers they could be associated with the SAC, which is notified, in part, for Barbastelle and Bechstein's bats.

Natural England advise that, if Barbastelle bats associated with the SAC use the river as a flight route/foraging then, as a competent authority under the provision of the Habitat Regulations, the National Park Authority should have regard for any potential impacts that the proposal may have. Natural England advise that, taking a precautionary approach, the National Park Authority should conduct a Habitat Regulations Assessment to determine whether the proposal is likely to have a significant effect on the SAC.

The main factors considered to potentially cause loss or decline in Barbastelle bats from the proposed development are considered to include internal lighting spreading out over the River Avill. Lighting is considered to have a high impact on Barbastelle bat roosts and a lesser impact on foraging and commuting habitats.

Through the planning application, the Wildlife Officer and the applicant has discussed potential appropriate mitigation. Through those discussions, the Wildlife Officer has advised that the mitigation proposed is considered sufficient to avoid impacts to the SAC and its qualifying features (Barabastelle bats). This has informed a Habitats Regulations Assessment, which at the time of writing this report is being considered by Natural England.

Having regard to the Ecological Impact Assessment submitted with the application, together with the advice of Natural England and the Wildlife Officer it appears likely that, with suitable planning conditions, suitable mitigation can be put into place that would reduce potential adverse impact, with compensation reducing residual effects to a low or negligible level. Such mitigation would include the need for a detailed lighting plan and assessment, and the inclusion of electronic blackout blinds with timers.

With appropriate mitigation, which would appear achievable, it is likely that, should planning permission be granted, the applicant would obtain a European Protected Species Mitigation licence. In having regard to this, the Authority must consider the Habitats and Species Regulations 2017 and the derogation tests. In this regard, there is public interest in the proposed development, as outlined earlier in this report and in approving development that complies with Local Plan policy; it is not possible to provide the proposed development at an alternative site and so there is not considered to be a satisfactory alternative; and, having regard to the application and the survey work and

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assessment, Officers are satisfied that the development will not be detrimental to the maintenance of the population of European Protected Species potentially affected, at a favourable conservation status in their natural range.

Having said this, at the time of preparing this report, the comments of Natural England in relation to the Habitats Regulation Assessment carried out by the Wildlife Officer are awaited. Although, from the information available, it is anticipated that Natural England will be content with the assessment, this will need to be confirmed and the Committee will be verbally updated by Officers at the Authority meeting.

NEIGHBOURING AMENITY

Policy CE-S6 of the Local Plan advises that, among other things, development should not detrimentally affect the amenities of surrounding properties and occupiers including overlooking, loss of daylight, overbearing appearance, or other adverse environmental impacts.

There are residential neighbours to the western side of the application site. A bed and breakfast property, at 7 Mill Lane, lies to the east side, which is in National Trust ownership.

7 Mill Lane has its principal elevation facing south toward the River Avill. The property is about 19 metres to the east of the tea room building. The proposal would increase the size of the application building and there could be an increase in comings and goings of people visiting the tea room from the Castle, with the access for this leading along the southern side of 7 Mill Lane.

There is however an existing general impact by virtue of the existing development and activities at the site, including with people visiting the water mill. In having regard to this, the distance of separation and the arrangement of buildings, with the proposed extension to the south west side of the tea room building, the proposed development is considered to have an acceptable impact on the amenity enjoyed at 7 Mill Lane.

The residential properties along Mill Gardens lie to the west of the application site. Number 1 Mill Gardens is the closest of those properties and that dwelling has an end gable facing toward the application site. The grounds for the tea room lie between the neighbours to the west and the tea room building. There is more than 20 metres between the tea room building and the dwellings at Mill Gardens.

The main windows within the extension would face south west and toward the river. Two new first floor windows, serving the dining area, are proposed in the north west elevation gable end that faces toward 1 Mill Gardens.

There is an existing mutual impact between neighbouring land uses and this is common with many other more built up areas of villages. There is existing vegetation within the grounds of the tea room, including within the space between the opposing gables of the proposed extension and 1 Mill Gardens. The vegetation comprises low shrubs and also some trees. 1 Mill Gardens occupies a slightly higher ground level.

Having regard to the relationship of the application site with the neighbours to the west, the distance between these properties and the nature of the existing land uses, the

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proposed development is considered to have an acceptable impact on neighbour amenity. The development is not considered to detrimentally affect the amenities of surrounding properties and occupiers including by virtue of overlooking, loss of daylight, overbearing appearance, or other adverse environmental impacts. Is, therefore, considered to satisfied Policy CE-S6 in terms of its impact on neighbouring amenity.

FLOOD RISK

The application site is partially within Flood Zones 2 and 3. The site is, therefore, identified as having a medium to high probability of flooding.

A Flood Risk Assessment (FRA) has been submitted in support of the application. The Environment Agency, having regard to this, advise that the FRA has adequately assessed the risks to development and suggested suitable mitigation measures to ensure the development remains safe from flooding over its lifetime in line with the NPPF.

The Flood Zone 3 level is considered to be at 25.96 AOD for this site. The proposed extension would be built on existing levels greater than 25.96 AOD and construction is to incorporate flood proofing and resilience details. Flood boards will be fitted to the three lower ground floor doors and all ground floor wiring will be wired down from a ring main at first floor level to points 450mm above finished floor level.

It would not be possible to extend the building outside of the flood zone. The proposal is not considered to materially increase the risk of flooding elsewhere nor materially reduce the potential of land for flood management. The proposal is considered to suitably reduce the potential for flood risk within the development and to accord with Local Plan policy CC-D1 (Flood Risk).

HIGHWAY SAFETY

Policy AC-D2 advises that development which will cause unacceptable levels of traffic in terms of the environmental or physical capacity of the local road network, or would prejudice road safety interests, will not be permitted.

AC-S3 advises that there is a presumption against providing for peak parking demand, and that the Authority will work with the highway authority and others to identify local solution to congestion and parking issues. The policy advises that proposals for new development should make adequate provision for parking in accordance with policy AC-D3 (Parking Provision and Standards).

AC-D3 advises that proposals will be permitted where they make appropriate provision for parking and that developments in more sustainable locations that are well served by public transport or have good walking and cycling links will be considered appropriate for lower levels of car parking provision, or in appropriate cases, no car parking provision.

Under table 9.1 (Guide to Parking Standards) associated with the policy, café uses would typically require one parking space per 16 square metres. The proposed 124 square metre extension would therefore typically bring a need for an additional 8 parking spaces under the guide.

The preamble (paragraph 9.28) to the policy and table 9.1 advises that the National Park Authority will take into account the proximity of public parking (including on-road parking)

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and public transport.

HC-D18 requires, among other things, that development does not adversely affect the locality or the amenity of nearby residents as a result of traffic or parking.

Objections to the proposal raise concern because of the scale of the proposed extension, with a lack of dedicated parking at the tea room site itself and because the access lane is narrow and there is already pressure on parking on the local streets and at the public car park on Park Street, which lies nearby.

The application details explain that the current parking arrangement and access for the tea room would remain unaltered. Deliveries are anticipated to be via the same number of delivery vehicles, but each carrying more stock to supply the extended facility. There would be two car parking spaces at the site, which would accommodate bed and breakfast at Mill House (7 Mill Lane), and there would be space available for delivery drop off and turning.

The Highway Authority refer to standing advice in this case. Officers have pressed the Highway Authority for bespoke comments, however, the Authority have declined to provide specific comment on the proposal.

In this case the National Trust is the applicant and it is, therefore, anticipated that the extended facility would accommodate those visitors to Dunster Castle, most of which would likely arrive at the tea room via the castle grounds and on foot. The tea room would also be available to the general public. The submitted papers explain that the applicant welcomes members and guests to the Castle via the main drive and, therefore, these visitors are accommodated in the Castle car park and they can walk to the tea room via the Castle grounds and gardens. The applicant explains that other visitors to the tea room would have the option to use publically accessible parking spaces available within the village, as is currently the case and that staff would park away from the tea room either at the National Trust's parking areas or in public parking areas.

The approach road, Mill Lane, to the application site from West Street Mill is a single width public highway, with no footway provision and with front doors and garden gateways leading directly on to the road near its junction with West Street.

There is on street parking available along the eastern side of West Street, approximately 170 metres from the application site, although this is typically at a premium. Park Street lies to the south and is directly linked to Mill Lane via a pedestrian link through Mill Gardens. The walk between Park Street and the application site is approximately 150 metres.

There is public on street parking along Park Street, although this is also typically at a premium.

A public car park lies at the end of Park Street to the south west of the application site. The public car park is popular with walkers accessing Gallax Hill and Dunster Deer Park and users of Dunster Packhorse Playing Field. The car park has space for 17 vehicles. Although available spaces are often in short supply especially during the summer months and school holidays.

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The National Trust Castle car park lies to the north of the application site. The car park is accessible on foot via the Castle grounds, at a distance of approximately 450 metres.

Public parking along the High Street and car park at Dunster Steep is a further distance away.

The proposed extension would increase the size of the tea room, increasing its capacity. This brings the potential for a material increase in traffic to the site. The existing parking area for the tea room is informally laid out and it appears this is currently able to provide space for up to 4 vehicles. The applicant advises that this parking area would reduce with the proposed development and that 1 parking space would be lost. Under the Local Plan, the proposed extension, because of its floor area, would typically require up to an additional 8 car parking spaces.

No additional spaces are proposed and the development would see the loss of one of the existing parking spaces at the site.

While there is a public car park nearby at Park Street and some on street parking along West Street and Park Street, these public parking areas are typically at a premium, particularly during summer months and school holidays.

The proposed development is, therefore, considered likely to have the potential to cause congestion and harm the existing standard of highway safety along the local road network, particularly during the summer months and school holidays.

Having said this the applicant has explained that in excess of 95 percent of visitors to the tea room access on foot via the Castle grounds and the other smaller percentage on foot down Mill Lane. The applicant comments that no visitor car parking has ever been provided at the tea room and this proposal would see no change to this.

Notwithstanding this, the existing tea room is a separate site and land use to Dunster Castle. While the applicant currently operates the tea room and Castle sites together and, because of this the tea room has the ability to rely on the Castle car park and a large number of visitors arriving from the Castle may be on foot, there is no certainty through the planning application that this arrangement would carry on in the future.

The tea room, being a separate planning unit and site to the Castle, is not ancillary to the Castle and there is the possibility that the tea room could be leased to a separate third party that may not have the benefit of the direct link with the Castle nor access to its car park. Indeed, the history of the tea room shows that it has been leased separately by a third party.

Considering the tea room in isolation of the Castle, some traffic would be likely to seek to try and access the site via Mill Lane, but because the Lane does not accommodate public car parking, those visitors would have to turn and leave Mill Lane to access public parking. Mill Lane is narrow, without pedestrian footpath and with doorways opening directly onto the road. An increase in traffic along this road, therefore, has the potential to cause greater conflict with pedestrians and other highway users.

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Objections from some local residents raise concern in relation to the availability of public parking along West Street, Park Street and within the small public car park on Park Street, because available spaces are in short supply and the parking is particularly congested during summer months and school holidays.

The proposed development in isolation of and if operated independently of the Castle would have the potential to cause harm to highway safety.

The association with the Castle and the matter that the tea room and Castle sites are in the applicant's ownership is a material planning consideration. Planning conditions can be used to mitigate against adverse impacts.

In this case, the applicant has explained that the majority of the Castle grounds are inalienable and that this means the car park will always be available. Officers have discussed the possibility of ensuring that the Castle car park remains available to users of the tea room through a condition of planning permission. The applicant has agreed to this.

With such a condition and the matter that the National Trust grounds are largely alienable, it is likely that a significant proportion of visitors to the tea room would come from the Castle car park and via the Castle grounds. The applicant has advised this is the experience with the current tea room and a traffic management plan could be secured to seek to ensure this continues to be the case. Thus the potential for congestion along Mill Lane and Park Street would be reduced compared to a proposal without the benefit of access to the Castle car park.

Having regard to this, as well as, the proximity of public parking areas near the application site, the proposed development, with a condition to ensure access remains available to the Castle car park, could be considered to have an acceptable impact on the existing level of highway safety. This is, however, considered to be a balanced judgement and there remains potential for users of the tea room to choose to seek to access the site via Mill Lane or to seek to park nearer the site and at public parking areas on Park Street.

Paragraph 109 of the NPPF advises that development should only be prevented or refused on highway grounds if there would be unacceptable impact on highway safety, or residual cumulative impacts on the road network would be severe.

The proposed development within the main built form of Dunster and with the proximity of public parking area and the ability for users of the tea room to access the Castle car park is considered unlikely to cause a severe impact on highway safety, and Officers consider that the proposal, on balance, complies with policies AC-D2, AC-D3 and HC-D18 of the Local Plan.

IMPACT ASSESSMENT

Some objections to the proposed development raise concern in relation to its scale and the impact of the proposed increased size tea room on other businesses within the settlement, particularly those in the High Street. Some objectors have requested that an economic impact assessment for the development be carried out.

Conversely, there is support for the application, including from a local business that considers the Castle brings positive impact to their trade and that the proposed café

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extension is acceptable.

Policy HC-D18, referring to local commercial service provision, does advise that an impact assessment can be sought if that is considered necessary by the National Park Authority.

Under HC-D18 development should contribute to the overall vitality of the settlement and the local economy. In this regard, the papers explain that over recent years visitor numbers have increased considerably from around 130,000 per year a few years ago, to over 210,000 per year now. The applicant advises that, apart from being small, the tea room is not set up to accept customers with impaired mobility and that the proposals would address this by providing ramped access and a fully accessible lavatory.

The papers explain that the extension, with another 50 indoor seats will not accommodate all the demand on busy days in the summer season or in school holidays, which can be around 1800 people per day, but that it would help.

The applicant advises that the National Trust calculates its catering provision based on visitor numbers and for a site such as Dunster, the applicant would expect to provide a minimum of 190 indoor and outdoor covers if setting up a new operation. The applicant says that the proposal falls short of this and this recognises the proximity of the village services as part of the solution, and that, its primary benefit will be in allowing the catering operation that is a key expectation of visitors to viably operate all year round.

The applicant outlines that for the last two years the National Trust has operated at a loss in the winter months to provide the service to support a year-round visitor destination, which can bring benefit to the Castle and wider settlement.

The applicant explains that customers are grateful for the tea room, but outline that many people are unhappy with its size, as once it is full there is no where warm or dry to sit – customers arrive and see the small room is full and turn away, unhappy. The applicant advises that to ensure they can continue to encourage winter visits to the site they need to provide the facilities people expect.

The applicant advises that, without the extension, they will not be able to operate all winter indefinitely, meaning substantive, year round local employment will be at risk. They advise that they are looking to respond to the demand of visitors to the Castle, Water Mill and Grounds and that they will not be able to fully cope with that, even with the extension. The applicant explains that they are not looking at taking trade from other catering outlets and that visitor numbers increased by 30,000 in 2016 and again by 12,000 in 2017.

In general, competition is not a matter for consideration under planning applications. The NPPF seeks planning policies and decisions that help create the conditions in which businesses can invest, expand and adapt. The NPPF (para. 80) advises that significant weight should be placed on the need to support economic growth taking account of both local business needs and wider opportunities for development. In terms of supporting a prosperous rural economy, the NPPF advises that planning decisions should enable the sustainable growth and expansion of all types of business in rural areas.

Reference by some objectors is made to an economic impact assessment carried out in

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2009 by the National Trust when considering a proposal to establish a café facility. That report concluded, among other things, that visitors to the castle go to the village to explore as well as take refreshment and that about 18 percent go to the village for refreshment only. The report considers that there is no proof from the research that a café within the castle grounds will significantly reduce number of castle visitors going to the village. However, there is evidence to suggest that catering at the castle would have an impact on Dunster catering establishments themselves.

Be that as it may, that economic impact assessment was carried out nearly ten years ago and was on the basis that the castle averaged around 116,000 visitors a year.

The castle now sees around 210,000 visitors a year. The significant increase in visitor numbers and the age of the report mean that it is considered to carry limited weight in the consideration of this proposal.

Paragraph 6.217 of the Local Plan, leading to Policy HC-D18, advises that in some circumstances an impact assessment may be required. However, the policy preamble explains that for extensions to existing services an impact assessment is unlikely to be required. Having regard to this and the details outlined above, Officers have not requested an impact assessment.

In this case, the applicant has outlined why they consider there is a need and demand for the proposed facility to meet the requirements of visitors to the castle and that the proposed scale of the development would not meet all of the anticipated demand, particularly during busy times. The applicant has explained that there is signage within the grounds of the castle to encourage visitors to also explore the wider village, its attractions and facilities.

The site is an existing café and the site lies within the main built up area of the settlement. In the circumstances, Officers are satisfied that an impact assessment is not required as part of this application.

CONCLUSION

The proposed development being an extension of an existing tea room within the main built form of Dunster is considered to be acceptable, in principle, under Policy HC-D18 of the Local Plan.

The proposal follows extensive pre-application discussions, including with the Environment Agency and Historic England.

The design and scale of the development is judged to be acceptable under policies CE-S6 and CE-D4.

Subject to the final comments of Natural England, which will be verbally updated at the Authority meeting, the proposal, with appropriate mitigation are considered likely to have an acceptable impact on important wildlife interests.

The proposal, because of the relationship with neighbouring properties, distance between and existing levels of vegetation is considered to have an acceptable impact on neighbour amenity.

The proposal is not considered to materially increase the risk of flooding elsewhere and the proposal is considered to suitably reduce the potential for flood risk within the development in accordance with Policy CC-D1.

The proposal would increase the size of the existing tea room and bring a material increase in traffic movements and parking demand. The proposed development, with a condition to ensure the Dunster Castle car park is available for use by visitors and staff at the extended tea room, is on balance, judged to comply with Local Plan policies AC-D2, AC-S3 and HC-D18. The scheme would, on balance, be compatible with the existing infrastructure and would generate acceptable levels of traffic and parking in terms of the physical capacity of the local road network. As a consequence it is recommended that planning permission be approved.

Recommendation:

Approve subject to the following conditions

1. 1 Time limit for commencement of development (3 years)
2. The development hereby approved shall not be carried out other than in accordance with the following schedule of plans:
 - i. Drawing number 0656.01.P.001, Site Location Plan and dated 14 November 2017;
 - ii. Drawing number 0656.01.P.010, Proposed Site Plans and dated 19 October 2018;
 - iii. Drawing number 0656.01.P.002 A, Proposed Lower Ground Floor and dated 31 January 2019;
 - iv. Drawing number 0656.01.P.003, Proposed Upper Ground Floor and dated 7 August 2018
 - v. Drawing number 0656.01.P.004, Proposed Roof Plan and dated 7 August 2018;
 - vi. Drawing number 0656.01.P.05 A, Proposed South West Elevations and dated 19 October 2018; and
 - vii. Drawing number 0656.S.006 A, Locations of the Tea Rooms & National Trust Visitors Car Park dated 20 March 2019.
3. The development hereby approved shall be carried out in accordance with the approved Flood Risk Assessment (FRA) reference "0656 DUNSTER, Water Mill Tea Room" and submitted in support of the application. Specifically, the following mitigation measures detailed within the FRA shall be met within the development:
 - i. The proposed development shall be built on land with existing ground levels greater than 25.96mAOD. There shall be no development on land below this level.
 - ii. Flood resilience measures shall be proposed to the building up to level of 26.26AOD (25.96AOD plus 300mm identified on page 1 in the FRA).
4. Prior to construction on site, details including a sample of the timber and stone to be used in the construction of the walls for the extension hereby approved shall be submitted to and agreed in writing by the Local Planning Authority. The development shall thereafter be carried out in accordance with the agreed details.

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EXMOOR NATIONAL PARK AUTHORITY MEETING

5. The roof of the extension hereby approved shall be finished and externally clad in natural slate, to match that on the existing building. Windows, doors and external joinery hereby approved shall be constructed from timber and roof lights shall be conservation type installed to sit flush within the roof slope.
6. Prior to the first use or substantial completion of the development hereby approved, whichever is the sooner, a detailed lighting impact assessment shall be undertaken to determine baseline light levels along the River Avill and its bank shall be undertaken, unless otherwise agreed in writing by the Local Planning Authority, and submitted to the Local Planning Authority and agreed in writing. In addition, a detailed lighting plan for the management of artificial lighting within the development shall be submitted to and agreed in writing by the Local Planning Authority. The lighting plan shall include details of all external lighting, including position on the building, design, orientation and level of illumination, together with details for mitigating the potential for light spill from within the building.
7. Prior to construction on site, details of the stone and coping, including a sample, for the new wall to be constructed to the pedestrian access to Mill Lane at the north west end of the building shall be submitted to and agreed in writing by the Local Planning Authority. The development shall thereafter be carried out in accordance with the agreed details.
8. The extension hereby approved shall not be occupied unless visitors to the development hereby approved and those staff employed at the application site have access to Dunster Castle car park, as highlighted yellow on approved drawing number 0656.S.006, to park their vehicle.

In addition, prior to the commencement of the development hereby approved a traffic management plan shall be submitted to and agreed in writing by the Local Planning Authority. The traffic management plan shall detail how the applicant will direct visitors and staff to the application site to park at the Dunster Castle car park.

1. In accordance with the provisions of Section 91 of the Town and Country Planning Act 1990, (as amended by the Planning & Compulsory Purchase Act 2004).
2. To ensure the development accords with the approved plans, as amended.
3. To ensure that the development remains safe from flooding over its lifetime.
4. To confirm details of the proposal in the interests of the character and appearance of the historic building and its setting.
- 5, 7. In the interests of the character and appearance of the historic building and its setting.

6.2

EXMOOR NATIONAL PARK AUTHORITY MEETING

6. To avoid adverse impacts to the Exmoor and Quantock Oakwoods Special Area of Conservation and its qualifying features (Barbastelle Bats), in the interest of protected species and in the interests of the character of the dark night sky.

8. To ensure that visitors and staff to the application site has access to the Dunster Castle car park, which is in the applicant's wider ownership, in the interests of highway safety.

Notes to Applicant:

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. 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.

ENVIRONMENT AGENCY

Advice – Flood Resilience

In view of the potential flood risks in this locality, we would advise that any developer of this site gives consideration to the use of flood resilient construction practices and materials in the design and build phase. Choice of materials and simple design modifications can make the development more resistant to flooding in the first place, or limit the damage and reduce rehabilitation time in the event of future inundation.

Detailed information on flood proofing and mitigation can be found by referring to the CLG free publication 'Improving the Flood Performance of New Buildings'. Please see the link below:

http://www.planningportal.gov.uk/uploads/br/flood_performance.pdf

It would also be advisable for the applicant to prepare a flood plan which outlines how the business will respond to a flood. Further advice on this can be found in the following link: <https://www.gov.uk/prepare-for-a-flood>

WESSEX WATER

New drainage and water supply connections

Applications for extensions do not usually require a new connection to the public water supply mains. Your builder and plumber will explain how your existing arrangements may

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EXMOOR NATIONAL PARK AUTHORITY MEETING

be altered to accommodate any new water supply requirements subject to available capacity.

The planning authority will need to be satisfied with your private package treatment plant arrangements which will be subject to building regulations.

What to do with rainwater from new driveways and roofs

Rainwater running off new driveways and roofs will require consideration to provide the best solution for the local environment. Rainwater may already connect to our existing foul or surface water networks. If you or your builder believe rainwater connects to the foul water network this should be disconnected if possible and an alternative method of disposal considered; soakaways where possible or connection to a watercourse or surface water sewer. Rainwater flows from hard surfaces running via pipes outside of your property boundary should not be permitted to increase and be reduced, where possible, to reduce local flood risk. This can be achieved by soakaway (where ground conditions are suitable) or slowing flows down within your property with the use of rain butts, permeable paving and rain gardens.

What to do if there is a public sewer or water main close to the proposed extension

We do not permit the building over of public water mains or in many instances where affected sewers are greater than 300mm diameter. This is to protect both property and services to our customers.

According to our records there are no recorded public sewers or water mains within the red line boundary of the development site. Please refer to the notes on the attached map for advice on what to do if an uncharted pipe is located.

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 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.

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EXMOOR NATIONAL PARK AUTHORITY MEETING

Application No: **6/9/19/105**

Grid Ref. 291349 127902

Applicant: Mr M Harley, Exmoor National Park Authority, Exmoor House, Dulverton, Somerset

Location: 7 - 9 Fore Street, Dulverton, Somerset

Proposal: **Application under Regulation 3 of the Town and Country Planning General Regulations 1992 for the proposed change of use of 3 interconnecting offices from use class B1 to a flexible use comprising B1(a), A2, D1 and D2. (Amended description) (Full)**

Introduction: The application has been made by Exmoor National Park Authority and therefore comes before the Authority Committee for consideration.

The application proposes the change of use of part of the first floor of 7 – 9 Fore Street in Dulverton from a B1 office use to allow a flexible use comprising B1a (office), A2 (financial and professional), D1 (non-residential institutions) and D2 (assembly and leisure).

No physical changes are proposed to the building. The area of first floor not subject of this application would remain in B1 business use. The ground floor is the National Park Centre and library.

The application site lies in Flood Zone 2 and 3 and in Dulverton Conservation Area.

Consultee Response:

WEST SOMERSET COUNCIL: No comments received

SCC - HIGHWAY AUTHORITY: standing advice applies

DULVERTON TOWN COUNCIL: Members commented that consideration should be given to the impact of potential noise and disturbance to the occupants of the ground floor.

ENVIRONMENT AGENCY SOUTH WEST: No comments received

ARCHAEOLOGIST - ENPA: No comments received

HISTORIC BUILDINGS OFFICER - ENPA: No comments received

ECOLOGIST - ENPA: No ecological concerns

WEST SOMERSET COUNCIL: No comment received

SCC - HIGHWAY AUTHORITY: No comment received

DULVERTON TOWN COUNCIL: No comment received

ARCHAEOLOGIST - ENPA: No comment received

HISTORIC BUILDINGS OFFICER - ENPA: No comment received

WILDLIFE CONSERVATION OFFICER - ENPA: No comment received

ECOLOGIST - ENPA: No comment received

ENVIRONMENT AGENCY SOUTH WEST: No comment received

Public Response:

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EXMOOR NATIONAL PARK AUTHORITY MEETING

No comments received

RELEVANT HISTORY

- 6/9/81/014** Proposed renovation of cottages at rear of the Dulverton Ironmongers, Fore Street, Dulverton, as described in the plans submitted
Outline Approved 19 June 1981
Same Site
- 6/9/81/017** Proposed change of use of two first floor rooms from residential to offices at Dulverton Ironmongers, Fore Street, Dulverton, as described in the plans and drawings submitted
Full Approved 13 July 1981
Same Site
- 6/9/15/116** Proposed installation of solar roof panels (6.6kw array on three roof surfaces).As per amended plan and additional information dated 20.11.15. (Amended description).
Full Approved 24 November 2015
Same Site
- 6/9/96/106** Proposed change of use from store to public exhibition space, Th Cheese Store, Dulverton , as described in the plans and drawings submitted
Full Not Required 01 April 1996
Same Site
- 6/9/87/128** Proposed renovation of three dwellings to two dwellings at Germans Cottages at rear of Dulverton Ironmongers, Fore Street, Dulverton as described in the plans and drawings submitted
Full Approved 03 November 1987
Same Site
- 6/9/84/120** Proposed construction of footpath and residential development at rear of Fore Street, Dulverton as described in the plans and drawings submitted
Outline Approved 02 April 1985
Same Site
- 6/9/90/117** Proposed conversion of Cheese Store and Germans Cottages to Guildhall Centre, Fore Street, Dulverton as described in the plans and drawings submitted
Full Approved 03 July 1990
Same Site

Most Relevant Development Plan Policies:

EXMOOR NATIONAL PARK LOCAL PLAN 2011-2031

GP1 Achieving National Park Purpose and Sustainable Development

GP3 Spatial Strategy

GP4 The Efficient Use of Land and Buildings

CE-S1 Landscape Character
 CE-D1 Protecting Exmoor's Landscapes and Seascapes
 CE-S2 Protecting Exmoor's Dark Night Sky
 CE-S4 Cultural Heritage and Historic Environment
 CE-D3 Conserving Heritage Assets
 CC-D1 Flood Risk
 HC-S6 Local Commercial Services and Community Facilities
 HC-D18 Local Commercial Service Provision
 RT-S1 Recreation and Tourism
 SE-S1 A Sustainable Exmoor Economy
 SE-S2 Business Development in Settlements
 AC-S1 Sustainable Transport
 AC-D1 Transport and Accessibility Requirements for Development
 AC-D2 Traffic and Road Safety Considerations for Development
 AC-S3 Traffic Management and Parking
 AC-D3 Parking Provision and Standards

The National Planning Policy Framework is a material consideration.

The site is within a Conservation Area where there is a requirement to ensure that any development preserves or enhances the character or appearance of the area, as embodied in Section 72 of the Planning (Listed Buildings and Conservation Area) Act 1990.

Observations:

The main planning considerations are considered to be whether the principle of the change of use is acceptable and whether the proposal is acceptable in terms of its highway safety considerations, impact on local amenity and matters of flood risk. There are no physical changes to the building and the proposed change of use is considered to have a neutral impact on the character and appearance of the Conservation Area. The duty under s.72 of the Planning (Listed Buildings and Conservation Area) Act 1990 is, therefore, considered to be satisfied.

PRINCIPLE

Dulverton is identified as a Local Service Centre under the Local Plan. Dulverton is one of the largest settlements within the National Park and provides an extensive range of services. In accordance with the spatial strategy of the Local Plan, Dulverton together with Lynton & Lynmouth and Porlock is the most suitable location, in principle, for new development to consolidate employment and services to help address the needs of the National Park as a whole, the surrounding area, and the local community.

Under Policy GP3 development in Local Service Centres should strengthen the role and function of the settlement to sustain and improve the wide range of services and facilities, to serve the needs of the settlement and surrounding communities, address locally identified needs for housing and improve employment prospects for the local area.

Policy HC-D18 advises that proposals for change of use of buildings for local commercial service provision (including D1 and D2 uses) within named settlements will be permitted where, among other things, the proposed location contributes to the overall vitality of the settlement and the local economy and they will not adversely affect the locality, National

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EXMOOR NATIONAL PARK AUTHORITY MEETING

Park, or the amenity of nearby residents as a result of traffic or parking.

Under SE-S1, in order to strengthen, enhance and diversify the Exmoor economy, business and employment development will be encouraged.

The existing use is a commercial employment use, under a B1 use. The proposal to allow a flexible of that part of the building for B1 (office) use or other uses under A2, D1 and D2 is considered to be acceptable in principle under the Local Plan.

The application site lies within a Local Rural Centre and on a main street frontage in the town where there is a mix of uses, including shops, estate agents and cafés, as well as residential accommodation.

HIGHWAY SAFETY

Policy AC-D2 advises that development which will cause unacceptable levels of traffic in terms of the environmental or physical capacity of the local road network, or would prejudice road safety interests, will not be permitted.

AC-D3 advises that proposals will be permitted where they make appropriate provision for parking and that developments in more sustainable locations that are well served by public transport or have good walking and cycling links will be considered appropriate for lower levels of car parking provision, or in appropriate cases, no car parking provision.

Under table 9.1 (Guide to Parking Standards) associated with the policy, business uses would typically require one parking space per 30 square metres and for D1 uses this can be up to one space for each 20 square metres. The floor area for the proposed change of use is approximately 44 square metres. The current business use would therefore typically require 2 parking spaces under the Local Plan. The proposed development allowing a flexible use also has a requirement under the Plan for 2 parking spaces.

The proposal does not therefore bring a material increase in parking demand, although the nature and character of traffic attracted to the site can be expected to be different between the proposed uses, for example between a B1 office use or a D2 gym use.

The application site is located within what could generally be considered the a retail/commercial area of the town. There is short term public parking on Fore Street adjacent to the application site and there is also a public car park to the east, within approximately 60 metres walking distance of the application site.

Having regard to the existing use of the application site, its location in Dulverton and proximity to public parking, the proposed development is considered to have an acceptable impact on existing levels of highway safety in accordance with policies AC-D2 and AC-D3.

LOCAL AMENITY

Policy CE-S6 of the Local Plan advises that, among other things, development should not detrimentally affect the amenities of surrounding properties and occupiers including overlooking, loss of daylight, overbearing appearance, or other adverse environmental impacts.

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EXMOOR NATIONAL PARK AUTHORITY MEETING

There are residential neighbours to the south of the application site, along Monmouth Terrace. Other neighbours tend to be in commercial use, although there is also some first floor residential accommodation along the street.

There is an existing mutual impact between neighbouring land uses and this is common with many other central locations in small towns. The uses proposed are generally uses found in town centres.

Having regard to the nature and mix of development around the application site, the proposed development is not considered to cause material impact on local amenity by virtue of noise or overbearing impact. In addition the development is not considered to bring environmental concern and the proposal is judged to have an acceptable impact on local amenity.

FLOOD RISK

The application site is within Flood Zones 2 and 3. The site is, therefore, identified as having a medium to high probability of flooding.

The proposed change of use is at first floor level and the development would not bring a more vulnerable land use in to the building.

The application is for change of use and no new building is proposed. The proposal is not considered to materially increase the risk of flooding elsewhere nor materially reduce the potential of land for flood management. The proposal is considered to suitably take into account the potential for flood risk within the development and to accord with Local Plan policy CC-D1 (Flood Risk).

CONCLUSION

The proposed development, being a change of use of the existing B1 business use to allow a wider commercial use within part of the building, is considered to be acceptable, in principle, under policies SE-S1, SE-S2 and HC-D18 of the Local Plan.

The proposal is considered to have acceptable impacts in terms of highway safety, local amenity and flood risk.

On balance, the proposal is judged to comply with the relevant Local Plan policies and it is recommended that planning permission be granted.

Recommendation:

Approve subject to the following conditions

1. 1 Time limit for commencement of development (3 years)
2. Notwithstanding the provisions of the Town & Country Planning (General Permitted Development) Order 2015 and the Town & Country Planning Use Classes Order 1987, as amended (or any order revoking and re-enacting those Orders with or without modification) the premises, as far as this application relates, shall not be used other than for purposes falling within Classes A2, B1(a), D1 or D2 of the Use Classes Order without the prior grant of planning permission from the Local Planning Authority.

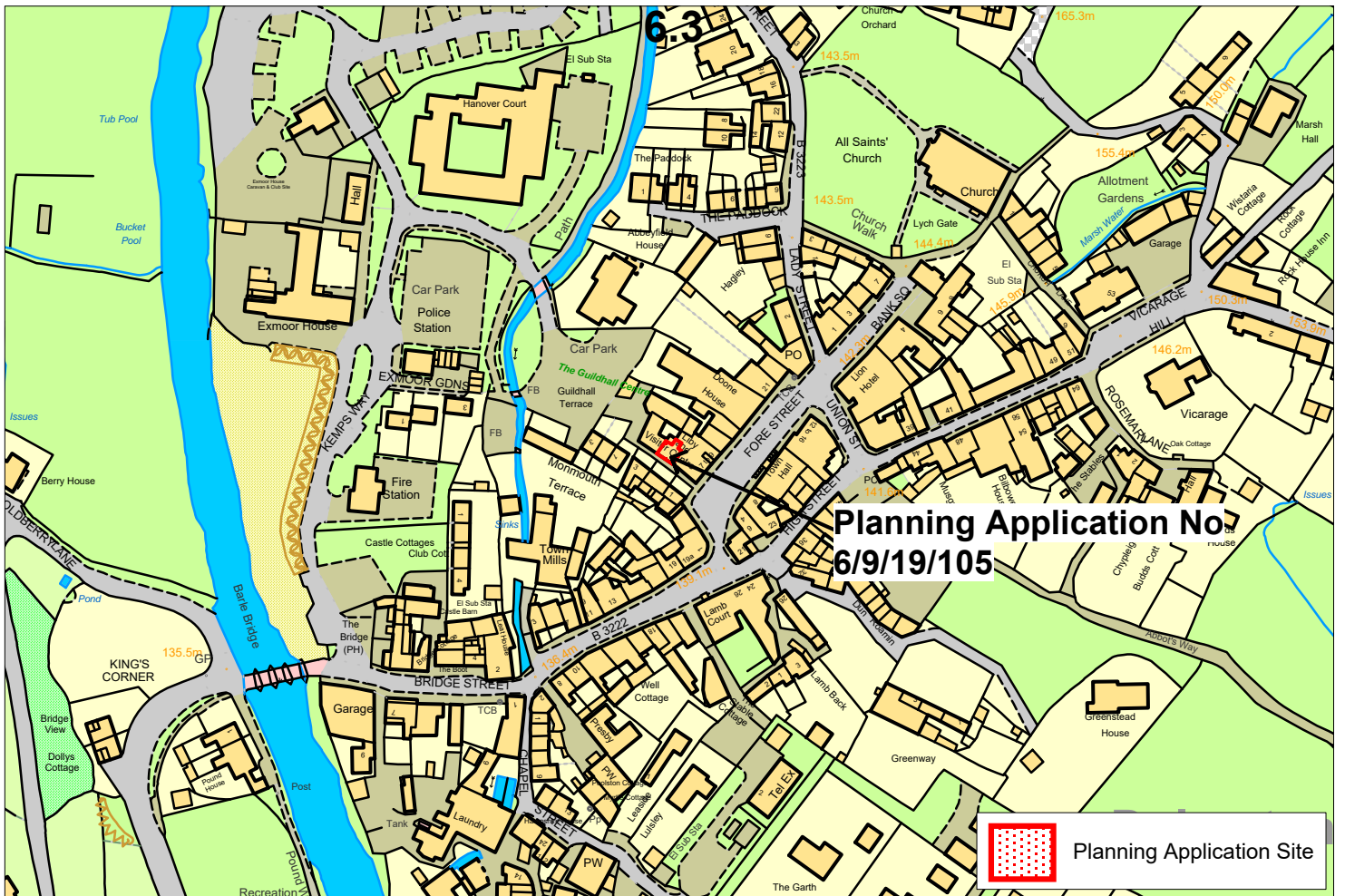
1. In accordance with the provisions of Section 91 of the

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EXMOOR NATIONAL PARK AUTHORITY MEETING

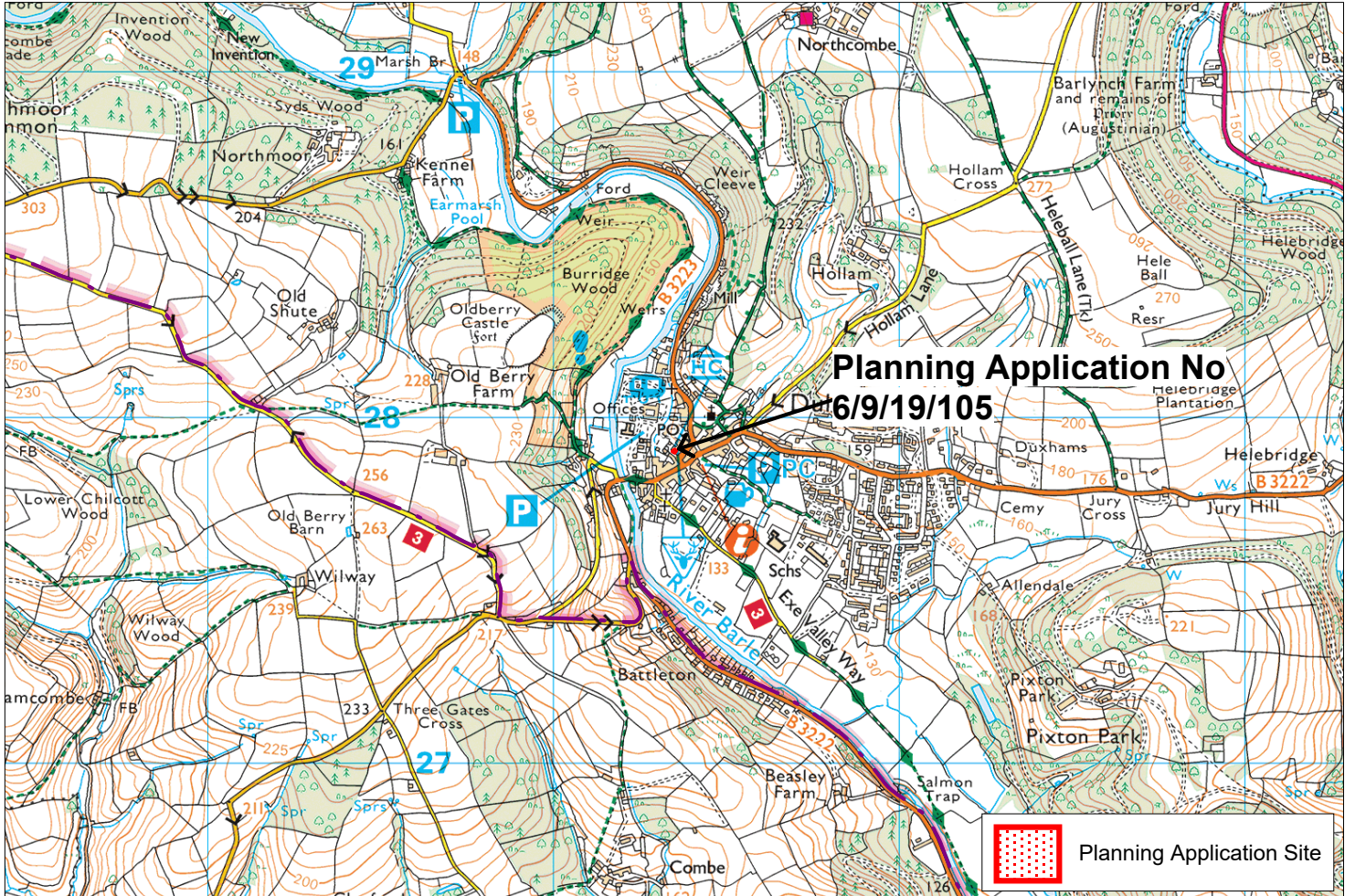
Town and Country Planning Act 1990, (as amended by the Planning & Compulsory Purchase Act 2004).

2. To ensure that the use remains compatible with surrounding land uses in the area, to ensure the application site remains in commercial use and to accord with policy SE-S2 of the Exmoor National Park Local Plan 2011 – 2031.



Site Map
1:2500

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Overview Map
1:20000

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EXMOOR NATIONAL PARK AUTHORITY MEETING

Application No: **6/14/19/102**

Grid Ref. 277365 139409

Applicant: Mr T Thurlow, Exmoor National Park Authority, Exmoor House, Dulverton, Somerset

Location: Whiterock Cottage, Field Studies Centre, Simonsbath, Somerset

Proposal: **Application under Regulation 3 of the Town and Country Planning General Regulations 1992 for proposed partial demolition of building and alterations to door and window openings. (Full)**

Introduction: The application has been made by Exmoor National Park Authority and therefore comes before the Authority Committee for consideration.

The application site is White Rock Cottage at the former field studies centre in Simonsbath. The application proposes the partial demolition of the building and alterations to door and window openings.

White Rock Cottage was built in 1820 by John Knight to house the estate manager and the head gardener. It is considered a key building in the unfinished gardens that were begun in the 1820s but never finished.

A school hall was added to the rear of the building in 1857 and later extensions were added throughout the 19th and 20th centuries. It is these later additions that the application proposed to demolition.

The school within the building closed in the 1970s and the building was then used as an outdoor education centre until circa 2000 and has since remained vacant. The National Park Authority took ownership of the building from Somerset County Council in 2011.

The papers submitted with the application explain that the proposal would save the important building and site from disrepair and add to the visitor experience of Ashcombe Gardens, Simonsbath and the surrounding area.

Consultee Response:

WEST SOMERSET COUNCIL: At the time of preparing this report the consultation period had not expired. Any comments that are received will be verbally update at the Committee meeting.

SCC - HIGHWAY AUTHORITY: No observations

HISTORIC BUILDINGS OFFICER - ENPA: Comments of the Head of Conservation and Access – White Rock Cottage was built in February 1820 to form part of John Knight's garden landscape in Ashcombe. After that date there were a series of rather ad hoc additions made to the building. In 1857 Simonsbath School hall was added to White Rock Cottage and became one of the central buildings in the development of Simonsbath as an estate village.

The current proposal seeks to remove a number of the later additions to White Rock Cottage with the intention of retaining White Rock Cottage itself and the original Victorian school building. The proposal seeks to achieve a balance in retaining the two

most historically important elements of the complex whilst removing additional built elements which detract. The visual appearance of White Rock Cottage particularly matters as it was originally built to form a key element of the designed landscape in Ashcombe, and the current proposal therefore enables the building to be reunited with its setting. The adjustment of window and door openings further restores this important connection.

The overall scheme is desirable in that it finds a viable use for two of the most historically significant buildings in Simonsbath.

ARCHAEOLOGIST - ENPA: At the time of preparing this report the consultation period had not expired. Any comments that are received will be verbally update at the Committee meeting.

LAND AGENT - ENPA: At the time of preparing this report the consultation period had not expired. Any comments that are received will be verbally update at the Committee meeting.

ECOLOGIST - ENPA: At the time of preparing this report the consultation period had not expired. Any comments that are received will be verbally update at the Committee meeting.

EXMOOR PARISH COUNCIL: At the time of preparing this report the consultation period had not expired. Any comments that are received will be verbally update at the Committee meeting.

Public Response:

No comments received at the time of drafting this report. Comments that are received will be verbally report at the Authority Committee meeting.

RELEVANT HISTORY

15352	Proposed alterations and additions to school building and provision of new drainage disposal system
	Deemed Not Determined 24 January 1952
	Same Site

Most Relevant Development Plan Policies:

EXMOOR NATIONAL PARK LOCAL PLAN 2011-2031
 CE-S1 Landscape Character
 CE-D1 Protecting Exmoor's Landscapes and Seascapes
 CE-S2 Protecting Exmoor's Dark Night Sky
 CE-S4 Cultural Heritage and Historic Environment
 CE-D3 Conserving Heritage Assets
 CE-S5 Principles for the Conversion or Structural Alteration of Existing Buildings
 CE-S6 Design and Sustainable Construction Principles

The National Planning Policy Framework is a material consideration.

Observations:

The main planning considerations are considered to be whether the proposal is acceptable in terms of its impact on the character and appearance of the heritage asset and local amenity, and the potential impact of the proposed development on important wildlife species and habitat.

HERITAGE AND LOCAL AMENITY

Local Plan policy CE-D3 (conserving heritage assets) advises that development affecting a heritage asset and its setting should, among other things, demonstrate a positive contribution to the setting through sensitive design, promote understanding and avoid unacceptable adverse effects.

The existing building has three main elements. The earliest and most historically significant section are the four rooms comprises in the original building that forms White Rock Cottage. These rooms originally provided two, single storey cottages, dating from 1820 and providing accommodation for the gardener and estate manager for John Knight.

A school hall was subsequently added to the rear (south east) of the cottage in 1857, and the addition of this created a 'T' plan to the building.

Other additions were added to the side and front of the cottage building during the 19th and 20th centuries.

In 1952 an unsympathetic flat roof extension was added to the school hall and it appears that alterations to door and window openings took place at that time. During the 1960s/70s the south east and south west elevations of the school hall were demolished and rebuilt in concrete block. The lancet headed windows to the south east elevation were altered and partially blocked.

The details submitted with the application explain that the building is located within a designed landscape that features carefully considered paths and viewpoints. The north west elevation of the original cottage is the principal elevation and this is the elevation that would have been seen from the adjoining designed landscape.

The buildings, particularly because of its association with John Knight is historically significant and a heritage asset of value in the National Park. The building is not listed and two recent applications to Historic England to get the building listed have been turned down.

The proposed development would see works to the building that remove parts of the more recent, less historically significant parts of the building and alter door and window openings to return the building back to its more original arrangement, but with the retention of the 1857 school hall.

The details show that some building parts dating to the mid 19th century and to the north east and north west of the cottage would be removed, however, the older parts of the building are retained and the overall proposal relates to the heritage asset that is Ashcombe designed landscape and the removal of those sections of the building reveals the original building and the intended relationship between the cottage and gardens.

The new windows and doors are proposed to be constructed from timber.

The proposed works seek to stabilise the heritage asset of cultural important in the history of this part of Exmoor National Park. The works remove unsympathetic or later additions to the original building and contribute to returning the link between the building and the

wider designed landscape of Ashcombe.

The Head of Conservation and Access advises that “the proposal seeks to achieve a balance in retaining the two most historically important elements of the complex whilst removing additional built elements which detract. The visual appearance of White Rock Cottage particularly matters as it was originally built to form a key element of the designed landscape in Ashcombe, and the current proposal therefore enables the building to be reunited with its setting. The adjustment of window and door openings further restores this important connection.”

The Head of Conservation and Access considers the overall scheme is desirable in that it finds a viable use for two of the most historically significant buildings in Simonsbath.

Overall, the proposal is considered to provide a positive contribution to the setting of the heritage assets, being White Rock Cottage and Ashcombe Gardens, and to promote the understanding and enjoyment of the heritage assets in accordance with Policy CE-D3 of the Local Plan.

WILDLIFE

The development at the application site is already covered by a European Protected Species (EPS) licence, although that may need to be amended further to this application. The details submitted with the application explain that the EPS licence was obtained ahead of the development with the understanding that planning permission was not required for the works proposed. Within the EPS licence sections of the building have been marked for demolition.

White Rock Cottage has been regularly monitored for lesser horseshoe bats throughout the duration of the EPS licence. A small area of the cottage where ceilings remained intact continued to be used by this bat species in 2018 and the bat licence covers any works affecting this species, including final exclusion of the horseshoe bat from the remnants of their old roost.

The building currently has an open roof and the building is roofed under scaffold to protect from the weather. The papers submitted explain that the current bat licence covers any necessary precautionary work required to protect bats and no further survey works is required other than that specified by the bat licence.

Having regard to this, the prior survey work carried out and the matter that a EPS licence is already in place it appears likely that suitable mitigation can be put into place that would reduce potential adverse impact, with compensation reducing residual effects to a low or negligible level. There is public interest in the proposed development, because this positively contributes to the setting of the heritage assets, being White Rock Cottage and Ashcombe Gardens, and promotes the understanding and enjoyment of the heritage assets in accordance with Policy CE-D3. It would not be possible to provide the proposed development at an alternative site and so there is not considered to be a satisfactory alternative. Having regard to the application and the survey work and assessment, Officers are satisfied that the development will not be detrimental to the maintenance of the population of European Protected Species potentially affected, at a favourable conservation status in their natural range.

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EXMOOR NATIONAL PARK AUTHORITY MEETING

Having said this, at the time of preparing this report, the comments of the Wildlife Officer are awaited. Although, from the information available, it is anticipated that the Wildlife Officer will be content, this will need to be confirmed and the Committee will be verbally updated by Officers at the Authority meeting.

CONCLUSION

The proposed development provides a positive contribution to the setting of the heritage assets, being White Rock Cottage and Ashcombe Gardens, and promotes the understanding and enjoyment of the heritage assets in accordance with Policy CE-D3 of the Local Plan.

Subject to no adverse comments being received from the Wildlife Officer, the proposals are considered to conserve important wildlife interests at the site in accordance with Policy CE-S3.

On the balance, the proposals are considered to comply with the relevant Local Plan policies and on this basis, Officers would be minded to recommend that permission be granted, subject to the consideration of further comments that may be received through the consultation exercise, which is live until the 3 April 2019 and after the Authority Committee meeting. Officers therefore request that the Committee delegate Authority to the Head of Planning and Sustainable Development to approve the application subject to any new material considerations comments that may be received and in the event that these raise significant material considerations that have not been addressed with this report to report the application back to Authority Committee at the next available meeting.

Recommendation:

Approve subject to the following conditions

1. 1 Time limit for commencement of development (3 years)
2. Prior to installation in the building the design and appearance of all new external windows and doors shall be submitted to and agreed in writing by the Local Planning Authority. The details shall include large scale drawings, with cross sections to demonstrate glazing details.
The development shall thereafter be carried out in accordance with the agreed details.
3. Prior to installation on the building, details for the treatment and finish of all newly exposed external walls, following the removal of those parts of the building hereby approved, shall be submitted to and agreed in writing by the Local Planning Authority. details shall include large scale drawings, with cross sections to demonstrate glazing details. The development shall thereafter be carried out in accordance with the agreed details.
 1. In accordance with the provisions of Section 91 of the Town and Country Planning Act 1990, (as amended by the Planning & Compulsory Purchase Act 2004).
 - 2, 3. In the interests of the historic character and appearance of the building.

Notes to Applicant:

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).

USE OF TRADITIONAL BUILDING METHODS

The use of mature lime putty/mortar without cement is a more traditional method of construction. If undertaken correctly by a competent person familiar with such a product, the finished development will safeguard the integrity of the building/structure. Such a finish also allows the fabric of the building/structure to breath properly and should have a longer and more effective life-span than a cement based material. Although lime putty/mortar is generally a cheaper material to use than cement, it requires a longer time period for application and drying out. Should you require more information on the use of lime putty/mortar then please contact either the Authority's Planning Department or Historic Buildings Officer who will be happy to assist you. (If undertaking rendering/mortar works the use of an appropriate sand will be essential to the success of such works).

MONITORING OF DEVELOPMENT

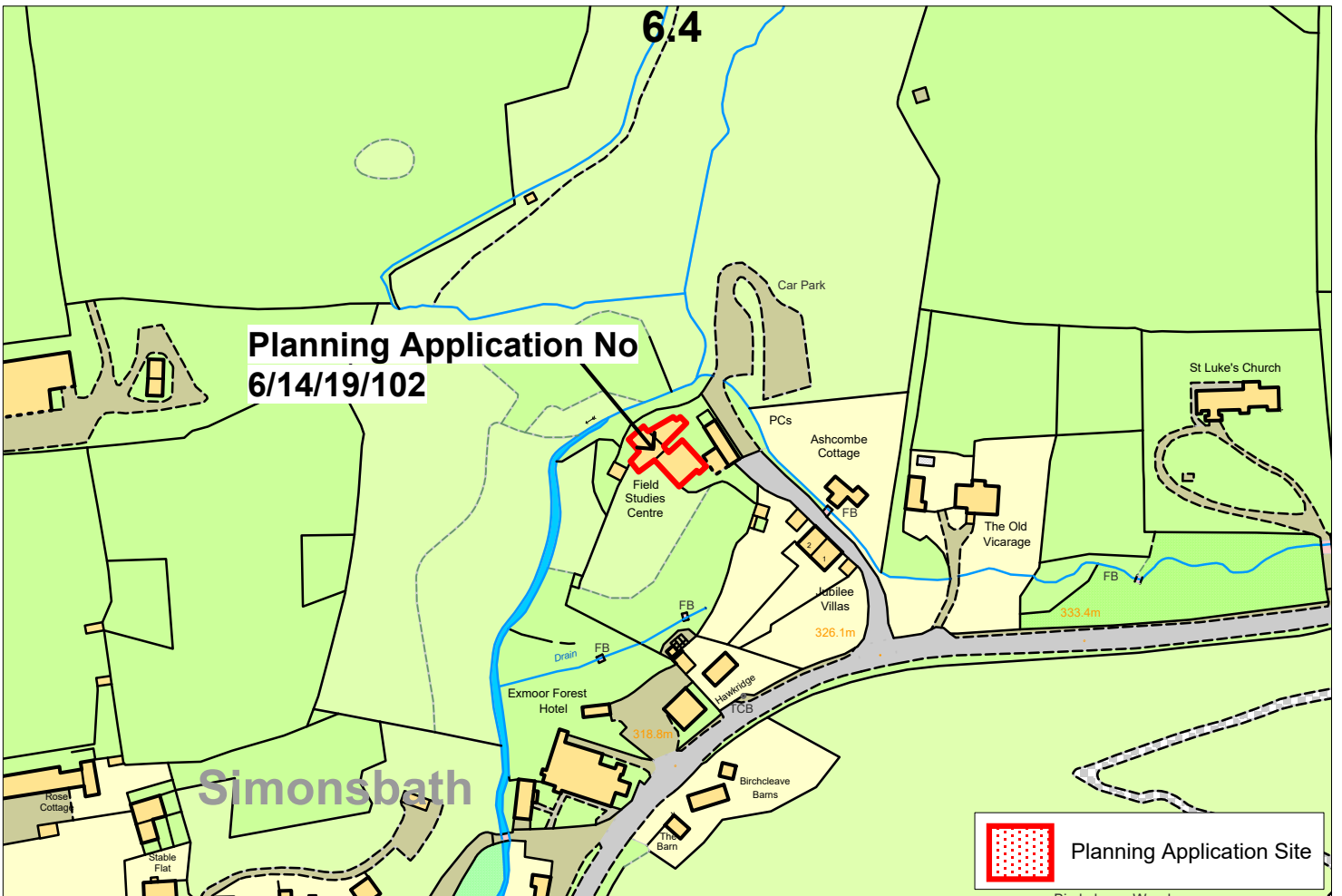
The applicant/developer is reminded that it is their responsibility to ensure that the requirements of each planning condition are met and that the works are undertaken in accordance with the approved plans. Any failure to meet the terms of a planning condition or work which does not accord with the 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.

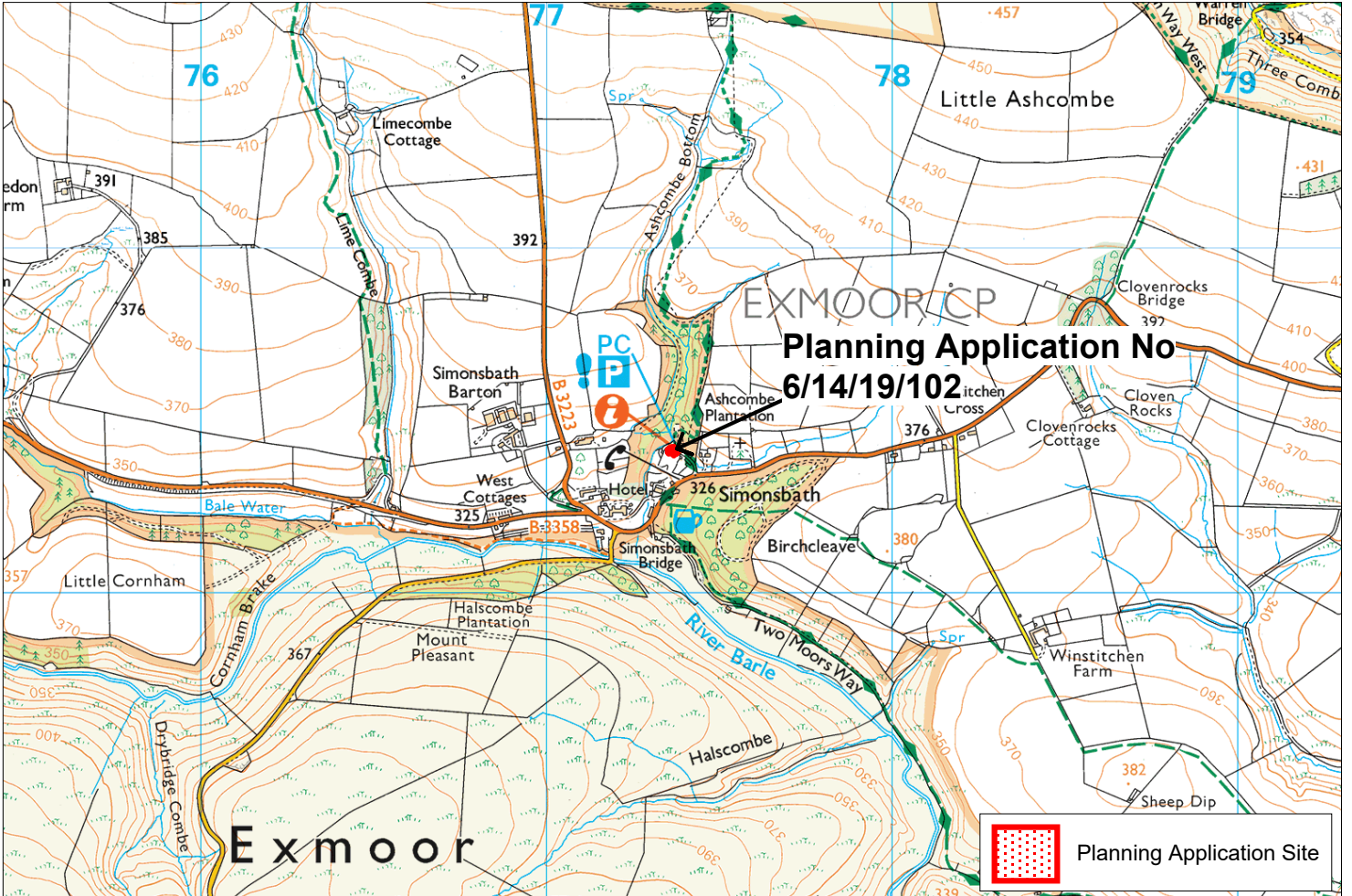
Please also note that due to other decisions of the High Court it is now not normally possible for the Local Planning Authority to agree to minor amendments to approved applications on an informal basis. The Department of Communities and Local Government have introduced a process whereby it is now possible to apply for a non-material amendment to a permission. 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.



Site Map
1:2500

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Overview Map
1:20000

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6.5

EXMOOR NATIONAL PARK AUTHORITY MEETING

Application No: **6/14/19/101**

Grid Ref. 272288 141133

Applicant: Miss G Hammond, Exmoor National Park Authority, Exmoor House, Dulverton, Somerset

Location: Pinkery Outdoor Education Centre, Simonsbath, Minehead, Somerset

Proposal: **Application under Regulation 3 of Town and Country Planning General Regulations 1992 for proposed removal of existing PV solar tiles and replace with 36 Trina 300w PV modules. (Full)**

Introduction: The application has been made by Exmoor National Park Authority and therefore comes before the Authority Committee for consideration.

The application site is Pinkery Outdoor Education Centre near Simonsbath. The application proposes the removal of existing solar tiles and replacement with 36 PV modules.

The existing solar tiles are 20 years old and at the end of their functional life. The proposal would see the tiles replacement with PV panels, over the same roof as the existing PV installation.

Pinkery accommodates groups of up to 36 students with 8 staff on a self-catered or fully catered basis.

The centre essentially comprises a grouped quadrangle of buildings and adjacent buildings.

The landscape is dramatic and sensitive. The North Exmoor Site of Special Scientific Interest (SSSI) is close to and within approximately 90 metres of the application site.

Consultee Response:

WEST SOMERSET COUNCIL: At the time of preparing this report the consultation period had not expired. Any comments that are received will be verbally update at the Committee meeting.

SCC - HIGHWAY AUTHORITY: No observations

LAND AGENT - ENPA: At the time of preparing this report the consultation period had not expired. Any comments that are received will be verbally update at the Committee meeting.

ARCHAEOLOGIST - ENPA: At the time of preparing this report the consultation period had not expired. Any comments that are received will be verbally update at the Committee meeting.

LANDSCAPE OFFICER - ENPA: At the time of preparing this report the consultation period had not expired. Any comments that are received will be verbally update at the Committee meeting.

WILDLIFE CONSERVATION OFFICER - ENPA: At the time of preparing this report the consultation period had not expired. Any comments that are received will be verbally update at the Committee meeting.

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EXMOOR NATIONAL PARK AUTHORITY MEETING

EXMOOR PARISH COUNCIL: At the time of preparing this report the consultation period had not expired. Any comments that are received will be verbally update at the Committee meeting.

PUBLIC RIGHTS OF WAY AND ACCESS OFFICER - ENPA: At the time of preparing this report the consultation period had not expired. Any comments that are received will be verbally update at the Committee meeting.

Public Response:

No comments received at the time of drafting this report. Comments that are received will be verbally report at the Authority Committee meeting.

RELEVANT HISTORY

- | | |
|--------------------|---|
| 6/14/79/008 | Proposed erection of a store and drying room - Educational at Pinkery Farm Exploration Centre, Simonsbath, as described in the plans and drawings submitted |
| Full | Approved |
| | 05 October 1979 |
| | Same Site |
| 6/14/09/102 | Application under Regulation 3 of the Town and Country Planning General Regulations 1992 for the extension and provision of porches. |
| Full | Withdrawn |
| | 01 July 2009 |
| | Same Site |
| 6/14/00/108 | Erection of 6kw wind turbine on 9 metre mast, extension to operate building, placement of 2000 litre oil tank |
| Full | Withdrawn |
| | 02 January 2001 |
| | Same Site |
| 6/14/13/107 | Application under regulation three of Town & Country Planning General Regulations 1992 for proposed demolition and re-construction of store building (bike shed). |
| Full | Approved |
| | 04 February 2014 |
| | Same Site |
| 75375/A | Proposed provision of additional toilet accommodation at Pinkery Farm, Simonsbath, as described in the plans and drawings submitted |
| Deemed | Approved |
| | 06 May 1971 |
| | Same Site |
| 75375/B | Proposed adaptation of open shed to allow use by students at Pinkery Farm, Simonsbath, as described in the plans and drawings submitted |
| Deemed | Approved |
| | 02 March 1972 |
| | Same Site |
| 75375 | Proposed use of Pinkery Farmhouse and adjoining barn together with an open area for tented camping, in connection with outdoor activities and field studies as described in the plans and drawings |

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EXMOOR NATIONAL PARK AUTHORITY MEETING

	submitted		
	Deemed	Approved	02 March 1970
	Same Site		
75375	Proposed use of Pinkery Farmhouse and adjoining barn together with an open area for tented camping, in connection with outdoor activities and field studies as described in the plans and drawings submitted		
	Deemed	Approved	02 March 1970
	Same Site		
75375/C	Proposed alterations to existing storage area to provide sleeping accommodation and storage areas at Pinkery Farm, Simonsbath, as described in the plans and drawings submitted		
	Deemed	Approved	18 September 1972
	Same Site		
6/14/16/102	Application under Regulation 3 of the Town and Country Planning General Regulations 1992 for proposed change of use of common room to residential unit of accommodation for staff.		
	Full	Approved	07 September 2016
	Same Site		
6/14/04/107	Application under Regulation 3 of the Town & Country Planning General Regulations 1992 for the erection of a replacement fire escape		
	Full	Approved	01 February 2005
	Same Site		
6/14/95/103	Proposed car and trailer parking area, Pinkery Outdoor Education Centre Simonsbath, as described in the plans and drawings submitted and amended plan received 12 July 1995		
	Deemed	Approved	05 September 1995
	Same Site		
6/14/02/102	Application under Regulation 3 of the Town & Country Planning General Regulations 1992 for an extension to the roof to create a ground floor passageway and for re-roofing of part of the building with natural slate and part with photovoltaic shingles		
	Full	Approved	11 March 2002
	Same Site		
6/14/84/103	Proposed erection of replacement classroom at Pinkery Farm Exploration Centre, Simonsbath as described in the plans and drawings submitted		
	Deemed	Approved	21 June 1984
	Same Site		
6/14/84/107	Proposed retention of Store and Drying Room at Pinkery Farm Exploration Centre, Simonsbath as described in the plans and drawings submitted		

6.5

EXMOOR NATIONAL PARK AUTHORITY MEETING

	Renewal	Approved	15 October 1984
	Same Site		
6/14/87/109	Proposed redevelopment of teaching , sleeping and storage accommodation: Provision of National Park Interpretation Centre, new generator house and additional gas storage tanks at Pinkery Farm Exploration Centre, Simonsbath as described in the plans and drawings submitted		
	Full	Approved	02 February 1988
	Same Site		
6/14/89/103	Proposed construction of timber sheds for storage at Pinkery Farm Simonsbath, Minehead as described in the plans and drawings submitted		
	Full	Approved	26 April 1989
	Same Site		
6/14/89/113	Proposed retention of store and drying room at Pinkery Farm Exploration Centre, Simonsbath as described in the plans and drawings submitted		
	Renewal	Approved	27 November 1989
	Same Site		
6/14/92/108	Proposed erection of generator shed, Pinkery Centre, Simonsbath Minehead, as described in the plans and drawings submitted		
	Deemed	Approved	19 January 1993
	Same Site		
6/14/94/102	Proposed demolition of generator shed/boot store, extension of classroom along with new link and covered way, alterations to form extra bedroom accommodation, Pinkery Outdoor Eductaion Centre, Simonsbath, as described in the plans and drawings submitted		
	Full	Approved	07 June 1994
	Same Site		
6/14/01/102	Erection of 6kw wind turbine on 9m mast, extension to generator shed to be used as battery store		
	Full	Approved	13 March 2001
	Same Site		
6/14/80/006	Proposed dining room extension and resiting of fire escape at Pinkery Farm Exploration Centre, Simonsbath, as described in the plans and drawings submitted		
	Full	Approved	20 August 1980
	Same Site		

Most Relevant Development Plan Policies:

EXMOOR NATIONAL PARK LOCAL PLAN 2011-2031
GP1 Achieving National Park Purposes and Sustainable Development
CE-S1 Landscape Character

CE-D1 Protecting Exmoor's Landscapes and Seascapes
CE-S2 Protecting Exmoor's Dark Night Sky
CE-S3 Biodiversity and Green Infrastructure
CE-S4 Cultural Heritage and Historic Environment
CE-D3 Conserving Heritage Assets
CE-S5 Principles for the Conversion or Structural Alteration of Existing Buildings
CE-S6 Design and Sustainable Construction Principles
CC-S1 Climate Change and Mitigation and Adaption
CC-S5 Low Carbon and Renewable Energy Development

The National Planning Policy Framework is a material consideration.

Observations:

The main planning issues are considered to be potential impact of the development on ecological interests and the impact of development on the character and appearance of the landscape.

Policy CC-S5 supports proposed for small scale renewable energy schemes that assist in contributing towards reducing greenhouse gas emissions and moving towards a carbon neutral National Park. The principle of development is therefore considered to be acceptable.

ECOLOGY

A bat and bird survey has been submitted in support of the application.

The roof affected in this case is over a building to the north east edge of the courtyard. While there is evidence of bats within the wider building complex, the roof void in the case of the building where the PV panels are proposed has no evidence of bats or bat habitat. The roof void has a plastic underlay below the existing PV tiles and mineral wool insulation.

The bat and bird survey considers that there is no further action required in terms of protected species for the development proposed.

Having regard to the survey work carried out and the matter that no evidence of bats, birds of their habitat has been identified within the building, which is subject of the proposed development, the proposals are considered to have no impact on important wildlife interests.

Having said this, at the time of preparing this report, the comments of the Wildlife Officer are awaited. Although, from the information available, it is anticipated that the Wildlife Officer will be content, this will need to be confirmed and the Committee will be verbally updated by Officers at the Authority meeting.

LANDSCAPE CHARACTER AND APPEARANCE

The details submitted show that the proposed replacement PV panels would either be installed to sit within the roof slope with slate tiles covering the surround area of the roof, or with the PV panels siting approximately 120 millimetres above the plane of the slate covered roof slope.

The panels would be installed on a south facing roof slope of a single storey building and facing into the courtyard of the building group. This arrangement results in the roof slope being relatively inconspicuous from the wider area outside of the courtyard and the proposal, whether siting flush with the roof plane or marginally proud, is considered to have an acceptable impact on the character and appearance of the landscape and the building group.

CONCLUSION

The proposed solar PV panels would replace existing PV tiles. The principle of development is acceptable under CC-S5. There is no evidence of bats or birds within the roof space of the building subject of the proposed development and the proposal is considered to have an acceptable impact on the character and appearance of the landscape. On balance the proposal is considered to comply with the relevant planning policies and Officers would be minded to recommend that permission be granted, subject to the consideration of further comments that may be received through the consultation exercise, which is live until 3 April 2019 and after the Authority Committee meeting. Officers therefore request that the Committee delegate Authority to the Head of Planning and Sustainable Development to approve the application subject to any new material considerations received and in the event that these raise significant material considerations that have not been addressed with this report to report the application back to Authority Committee at the next available meeting.

Recommendation:

Approve subject to the following conditions

1. 1 Time limit for commencement of development (3 years)
2. The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans, as listed below;
 - the 1:1250 Location Plan ref PC4PA,
 - Proposed plans, drawing number SAS250, and
 - Typical Section, drawing number SAS250 03 or SAS250 04.
1. In accordance with the provisions of Section 91 of the Town and Country Planning Act 1990, (as amended by the Planning & Compulsory Purchase Act 2004).
2. For the avoidance of doubt and to ensure the development accords with the approved plans.

Notes to Applicant:

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

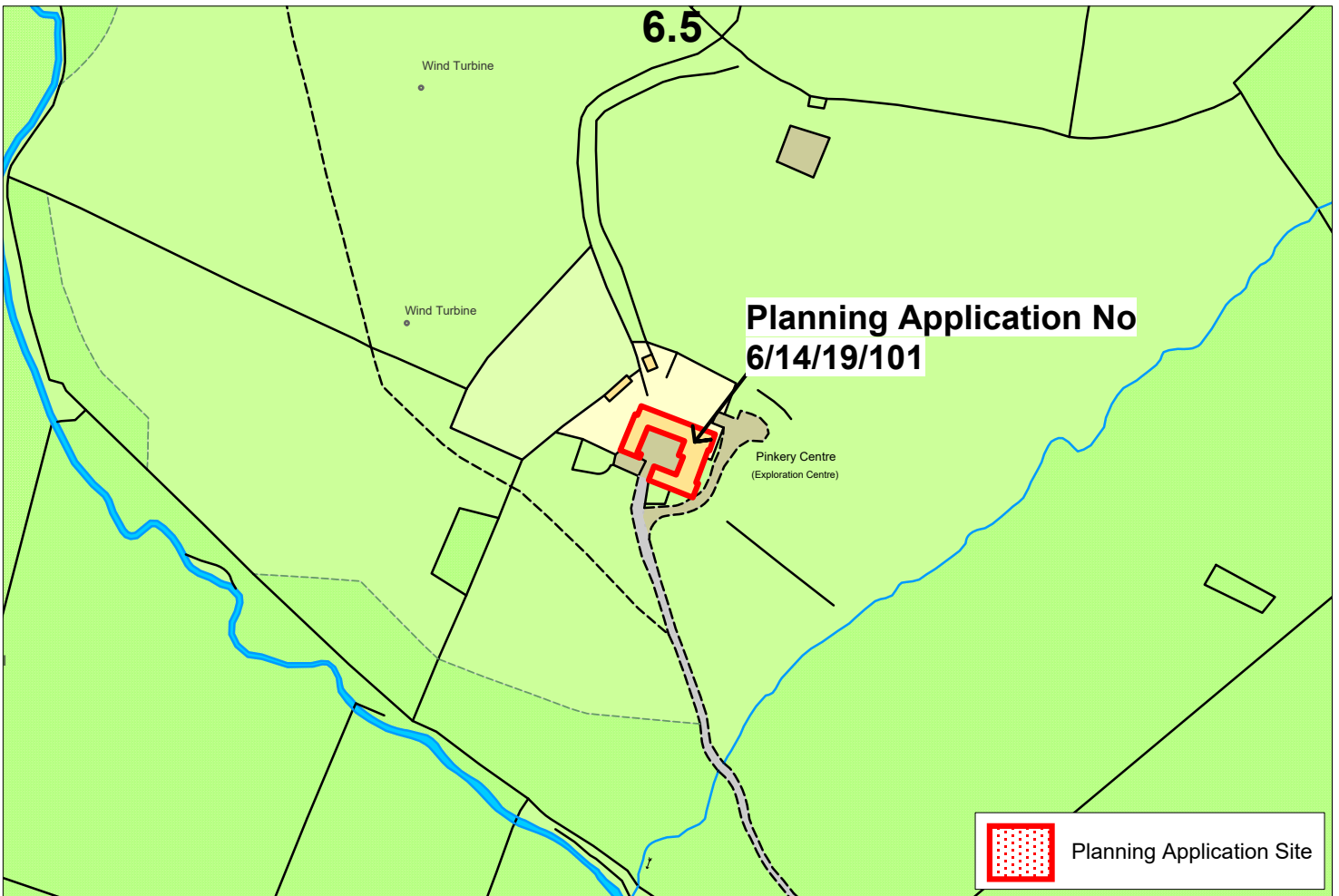
Please check all the conditions and informatives attached to this Decision Notice. If there are any conditions which require submission of details and/or samples prior to work commencing on site it is vital that these are submitted and agreed in writing by the Local Planning Authority before work starts. 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. 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.

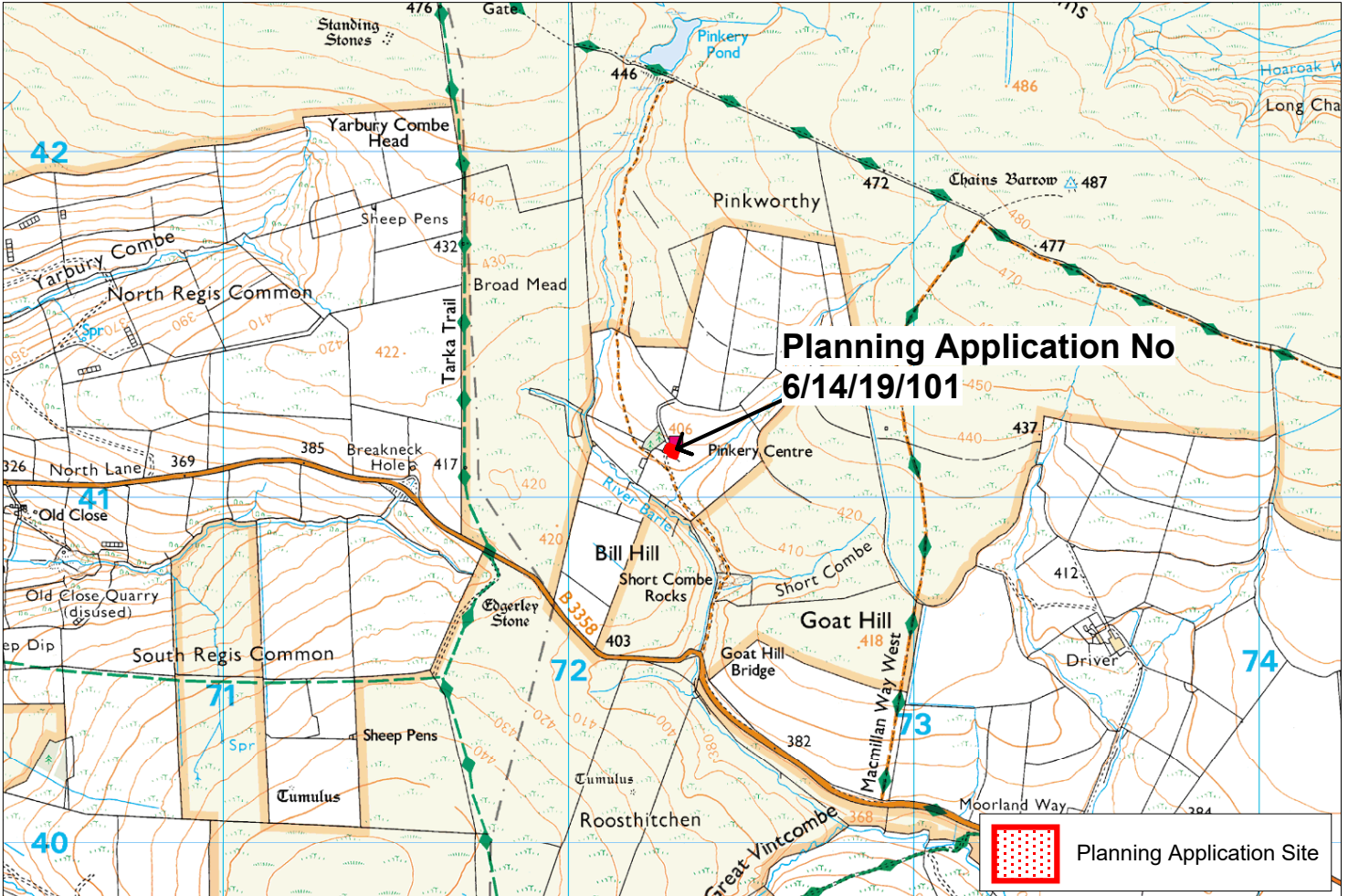
POSITIVE & PROACTIVE STATEMENT

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 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.



Site Map
1:2500

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Overview Map
1:20000

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6.6

EXMOOR NATIONAL PARK AUTHORITY MEETING

Application No: **6/13/19/104**

Grid Ref. 285528 138306

Applicant: Mr D Barnett, Exmoor National Park Authority, Exmoor National Park Auth Workshop
Auction Fields, Exford, Minehead, Somerset

Location: Exmoor National Park Workshop, Auction Fields, Exford, Somerset

Proposal: **Application under Regulation 3 of the Town & Country Planning General Regulations 1992 for proposed replacement log shed & extension to create timber store. (Full)**

Introduction: Planning permission is sought for the erection of a replacement log store and a timber store attached to an existing building. The application site is the Exmoor National Park depot, which is situated on the edge of Exford. The site consists of a main building with a larger storage building and smaller ancillary buildings within the yard. The site is accessed through a public car park and there is dedicated parking for the depot in front of the main building.

The nearest property to the depot is 1 Auction Fields. The garden of this property adjoins the north western boundary of the depot yard. Parts of the depot car park are within Flood Zones 2 and 3 but the depot itself and the adjoining yard are within Flood Zone 1. A public footpath runs through the car park.

The proposed timber store would be attached to the side elevation of an existing storage building. It would be finished in timber boarding under a corrugated metal roof. It would be used to store timber that is used in the construction of signposts, gates and fences.

The proposed log store would replace an existing log store on the same site. It would be finished in timber boarding under a fibre cement roof to match the existing building. It would be used to store logs that are used to run the wood burner in the main depot building.

This application comes before the Authority Committee as it is an application submitted by the National Park Authority for development on its own land.

Please note that at the time of writing this report, the consultation period for the application had not expired. It will expire on 29th March. Members will be updated should any responses be received before the Committee meeting on 2nd April.

Consultee Response:

WEST SOMERSET COUNCIL: No comment received

SCC - HIGHWAY AUTHORITY: Standing advice applies.

EXFORD PARISH COUNCIL: Four Councillors present supported the application and one abstained, but were concerned this was not a clear application with regard to the plans. There appeared to be confusion between the terms logs and timber. It was assumed the latter implied milled timber. If the application was for logs why did the ENP

need to store them?

SOUTH WEST WATER: South West Water has no objection.

WESSEX WATER AUTHORITY: Wessex Water has no objections to this application as there are no proposals to connect to our infrastructure.

ENVIRONMENT AGENCY SOUTH WEST: No comment received

SOMERSET COUNTY COUNCIL: We believe that this application is a minor application and falls below the requirements for LLFA statutory consultation. Therefore, the LLFA has no comments to make regarding this application. If you believe differently, please let us know.

WSC ENVIRONMENTAL HEALTH: No comment received

ARCHAEOLOGIST - ENPA: No comment received

LAND AGENT - ENPA: No comment received

LANDSCAPE OFFICER - ENPA: No comment received

PUBLIC RIGHTS OF WAY AND ACCESS OFFICER - ENPA: No comment received

WILDLIFE CONSERVATION OFFICER - ENPA: No comment received

Public Response:

None to date.

RELEVANT HISTORY

6/13/85/116	Proposed renewal of temporary siting of caravan at Auction Field, Exford as described in the plans and drawings submitted
	Renewal Approved 03 December 1985
	Same Site
6/13/86/114	Proposed extensions and alterations at Exford Depot, Exford as described in the plans and drawings submitted
	Consultation Approved 02 September 1986
	Same Site
6/13/92/101	Proposed contractors temporary working area, land alongside Exmoor National Park Depot, Exford, as described in the plans and drawings submitted
	Full Approved 04 February 1992
	Same Site
6/13/93/108	Proposed extension to Exford National Park Depot Yard and erection of timber storage shed, ENP Depot, Exford, Minehead, as described in the plans and drawings submitted
	Full Approved 03 August 1993
	Same Site
6/13/02/110	Application under Regulation 3 of the Town & Country Planning General Regulations 1992 for alterations and additions to existing Depot building, including dormer extension and external staircase. External alterations to yard area including re-location of gates and fence and chainsaw store, as additional plan dated 16.08.02 and amended plans dated 02/09/02 (Relocation of and redesign of chainsaw store.)

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EXMOOR NATIONAL PARK AUTHORITY MEETING

	Full	Approved	01 October 2002
	Same Site		
6/13/04/111	Application under Regulation 3 of the Town & Country Planning General Regulations 1992 for the erection of a flue in connection with a wood chip boiler		
	Full	Approved	07 July 2004
	Same Site		
6/13/87/113	Proposed extensions and alterations to Exford Depot, Exford as described in the plans and drawings submitted		
	Full	Approved	02 February 1988
	Same Site		
6/13/76/004	Proposed erection of depot building with storage enclosure at the Auction Field, Exford, as described in the plans and drawings submitted, as amended by plans received on 1 November 1976		
	Full	Approved	15 November 1976
	Same Site		
6/13/78/013	Proposed sawmill at Auction Field, Exford, as described in the plan and drawings submitted		
	Full	Withdrawn	02 October 1978
	Same Site		
36006/A	Proposed use of land for car park / picnic area and erection of a depot for Exmoor National Park Outside Staff		
	Outline	Approved	15 June 1972
	Same Site		
54867/A	Proposed erection of a dwelling and double garage on land adjoining the Auction Field, as described in the plans and drawings submitted		
	Full	Approved	02 June 1972
	Same Site		
6/13/81/016	Proposed use of land adjoining Exford Depot, Exford, for the storage of machinery, as described in the plans submitted		
	Full	Approved	13 October 1981
	Same Site		
6/13/11/118	Application under Regulation 3 of Town and Country Planning General Regulations 1992 for the proposed installation of 40 no. photovoltaic panels on roof.		
	Full	Approved	07 December 2011
	Same Site		
6/13/83/109	Proposed siting of caravan as temporary office accommodation at Auction Field, Exford as described in the plans and drawings submitted		
	Deemed	Approved	06 December 1983

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EXMOOR NATIONAL PARK AUTHORITY MEETING

	Same Site		
6/13/97/106	Picnic and amenity area for the village of Exford and visitors		
	Full	Rejected	05 August 1997
	Same Site		
6/13/15/103	Application under Regulation 3 of the Town and Country Planning General Regulations 1992 for proposed 6.5m x 2m solar kiln (for seasoning timber).		
	Full	Approved	07 July 2015
	Same Site		
6/13/15/113	Application under Regulation 3 of the Town and Country Planning General Regulations 1992 for proposed alterations to surface water drainage and installation of oil interceptor.		
	Full	Approved	02 February 2016
	Same Site		

Most Relevant Development Plan Policies:

EXMOOR NATIONAL PARK LOCAL PLAN 2011 - 2031

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 & Sustainable Construction Principles

CC-D1 - Flood Risk

SE-S1 - A Sustainable Exmoor Economy

SE-S2 - Business Development in Settlements

RT-D12 - Access Land and Rights of Way

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

Observations:

The main material planning considerations in this case are the principle of the development, the design, scale and materials, and the impact on the landscape, neighbouring amenity and biodiversity.

PRINCIPLE OF DEVELOPMENT

The existing use of the site is as a depot for the building and maintenance operations of Exmoor National Park Authority. One of the main operations at the depot is the construction of wooden signposts, gates and fences from locally sourced timber. Part of this process involves storing timber on site and leaving it to dry over a substantial period of time. Currently, there is no building space to store the timber under cover and so it is left to the elements. This can affect the quality of timber and its overall shape and appearance.

The other part of the proposal is for the erection of a replacement log store. The existing log store is a simple open fronted building that is also located within the depot yard. It is currently in a poor state and is at risk of collapse. There is a need to store logs on site for

6.6

EXMOOR NATIONAL PARK AUTHORITY MEETING

the wood burner located within the main depot building. A new building of similar scale with doors would provide a useable space to store the wood in dry conditions and also provide cover to chop the wood within the building.

Given that the proposed buildings would be erected within an existing depot yard that is located within a settlement, and taken into account the justified need for the buildings, it is considered that the proposed development is acceptable in principle, subject to other material planning considerations being satisfied.

DESIGN, SCALE AND MATERIALS

Policies GP1 and CE-S6 of the Local Plan require that design of developments should respond to local character, reflect local surroundings and materials. All development should be high quality, attractive and well designed so that it works well in the long term by paying attention to detail; giving consideration to layout, orientation, siting, density, scale, materials, landscaping and architectural detailing that conserves and enhances the area.

The timber store would be mono-pitched with an open front to allow air to circulate in order to dry the timber. The exterior would be clad in timber boarding above block walls and the roof would be clad in corrugated metal sheeting to reflect the building it would adjoin. The metal sheeting could be painted black or a similar dark tone to help soften its appearance and it is considered to be an acceptable use of this material given the use of it on the adjoining building.

The timber store would have an overall height at the open front of approximately 6 metres and this would fall to an approximate height at the rear of the building of 3 metres. This means that it would be approximately 2 metres taller than the building it would adjoin. The footprint would be approximately 93 square metres. It is considered that the height of the building is necessary to allow timber to be emptied directly into the building when taking account of the height of a tipping trailer, and the footprint is also necessary to accommodate the large amount of timber required to carry out the level of works that the depot does in relation to the construction of signposts, gates and fences. It is important to note that the timber is kept in the building for a substantial period of time and, therefore, there needs to be capacity to rotate the timber within the confines of the building.

The replacement log store would also have a mono-pitched roof to match the building it would replace. The external materials would also match the existing building with timber cladding on the external walls and fibre cement sheeting on the roof. The main difference would be the introduction of doors to enclose the building. These would be constructed from timber and are considered to be an acceptable addition. In terms of scale, the footprint would be the same as the existing building but there would be an increase in height of approximately 0.3 metres to allow better headroom within the building.

The design, scale and materials of the proposed development leads Officers to conclude that the proposal complies with Policies GP1 and CE-S6 of the Local Plan in respect of this material planning consideration.

IMPACT ON LANDSCAPE

Policy GP1 sets out the First Purposes of National Parks and states that development must conserve and enhance the National Park, its natural beauty, wildlife and cultural

6.6

EXMOOR NATIONAL PARK AUTHORITY MEETING

heritage and its special qualities.

Policies CE-S1 and CE-D1 require development to conserve and enhance the character and appearance of the landscape, and visual amenity.

The depot sits on the edge of Exford and is on the lower ground near to the River Exe. As it is siting on lower ground that is surrounded by rising land form, the site is not overtly visible from many public vantage points. This aside, any views of the depot that are achievable from public vantage points are seen in the context of the settlement as a whole.

It is noted that the proposed timber building would be an addition to the depot that would be larger than most of the ancillary buildings within the yard. However, in relation to the larger main depot building, it is considered that it would appear subservient in its proposed position at the rear of the site when viewed from the wider viewpoints. In addition, the rising backdrop of land behind it would mean that it should assimilate to a degree into the surrounding land form, particularly when taking into account the use of timber for the external wall cladding.

The log store would replace an existing building of similar scale and finishing materials, on the same site. As such, wider views into the site are not considered to be affected by this element of the proposed development.

There are few views into the depot from areas close to the site but members of the public do have access across the car park of the depot by virtue of a public footpath. The main depot building is the main feature from the footpath as it fronts directly on to the car park with no screening. The yard behind and to the side of the main building is screened from the footpath by high hedges and gates. The only views into the site from the footpath are when the gates are open. Both buildings would be visible when one of the gates are open.

The log store would sit in the same position as the existing log store and would be of similar scale. This means that it would not be materially noticeable from the footpath that this element of the proposed development has taken place. The timber store would be more noticeable from the footpath but it would be situated at the rear of the site, thereby increasing the distance between a user of the footpath and the building itself. Further to this, there is an existing building adjacent to the proposed site that would reduce the noticeability of the proposed timber store to a degree. The impact would be reduced further by the use of timber cladding against a rising backdrop of land. It is also important to consider that users of the footpath would expect such development to a degree as they are walking through the car park of a functioning depot. This is one brief view into the site and when taking into account the factors above, it is considered that the proposed timber store would not cause material harm to the enjoyment of users of the public footpath.

Taking the above into account, it is considered that the impact on the landscape as a result of the proposed development is compliant with Policies GP1, CE-S1 and CE-D1 of the Local Plan.

IMPACT ON NEIGHBOURING AMENITY

The nearest property to the sites for the log store and timber store would be 1 Auction

Fields. This property is situated approximately 48 metres from the site for the log store and approximately 50 metres from the site for the timber store.

The depot has regular activities within the main building and the yard that cause a level of noise as a base level. The log store would replace an existing building that has the same use. The timber store would cover an area of the site that is already used to store timber. As such, it is considered that the proposed development would not create new activities on site nor intensify existing activities on site. Officers consider that any noise emanating from the site would not be materially increased by the proposed development.

The distance of the proposed timber and log stores from the nearest neighbouring property, set out above, leads Officers to consider that the development would not overbear on, or cause loss of light to, this neighbouring property.

The proposed development is not considered to cause material harm to neighbouring amenity. It is, therefore, considered to comply with Policies GP1 and CE-S6 in respect of impact on neighbouring amenity.

IMPACT ON BIODIVERSITY

The only building to be removed as a result of the proposed development is the existing log shed. This is an open fronted building with a corrugated roof and is in a state of partial collapse. There is regular activity within the building in relation to the chopping of logs but there is potential for birds to nest within the building. It is considered that there a condition should be attached restricting works to outside the bird nesting season, unless an ecologist has checked for nesting birds and confirmed in writing to the Local Planning Authority that no birds will be harmed and/or that there are measures in place to protect birds that are nesting at the time of scheduled demolition.

Subject to the attachment of the above mentioned planning condition, the development is considered to comply with Policies GP1 and CE-S3 in terms of impact on biodiversity.

CONCLUSION

For the reasons outlined above the proposed development is considered acceptable and in accordance with the relevant development plan policies. Officers therefore recommend that the application be approved, subject to appropriate conditions.

Recommendation:

Approve subject to the following conditions

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.

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EXMOOR NATIONAL PARK AUTHORITY MEETING

2. The development hereby approved shall be carried out strictly in accordance with drawing numbers SAS257 PL04, SAS257 PL05, SAS257 PL06, SAS257 PL07 and SAS257 PL08, date stamped by the Local Planning Authority on 21st February 2019.

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

3. No demolition works shall commence between 1st March and 31st August, unless written approval is received from the Local Planning Authority confirming that they have received written confirmation from a qualified ecologist that he/she has undertaken a careful, detailed check of the vegetation for active birds' nests immediately prior to the demolition commencing and that no birds will be harmed and/or that there are appropriate measures in place to protect nesting bird interest on site.

Reason: To ensure the protection of nesting birds as they are afforded protection under the Wildlife and Countryside Act 1981 (as amended).

4. The external walls of the timber store hereby approved (labelled as such on approved drawing number SAS257 PL04) shall only be clad with timber boarding in accordance with the approved plans. The roof shall only be clad in black corrugated (not box profile) metal sheeting. The timber store shall be retained as such thereafter.

Reason: In the interests of the satisfactory appearance of the development upon completion.

5. The external walls of the log store hereby approved (labelled as such on approved drawing number SAS257 PL04) shall only be clad with timber boarding in accordance with the approved plans. The roof shall only be clad in anthracite grey fibre cement sheeting. The log store shall be retained as such thereafter.

Reason: In the interests of the satisfactory appearance of the development upon completion.

6. The buildings hereby approved shall only be used ancillary to the activities of the site edged in red on approved drawing number SAS257 PL08, for purposes incidental to the wider use of the site. They shall not be used for any other purposes.

Reason: To safeguard the amenity and character of the surrounding area by preventing potential uses that could be incongruous with the wider use of the site.

7. 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 buildings hereby approved 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.

Reason: In the interests of visual amenity, the conservation of protected species and habitats and to protect Exmoor's dark night sky.

Notes to Applicant:

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 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.

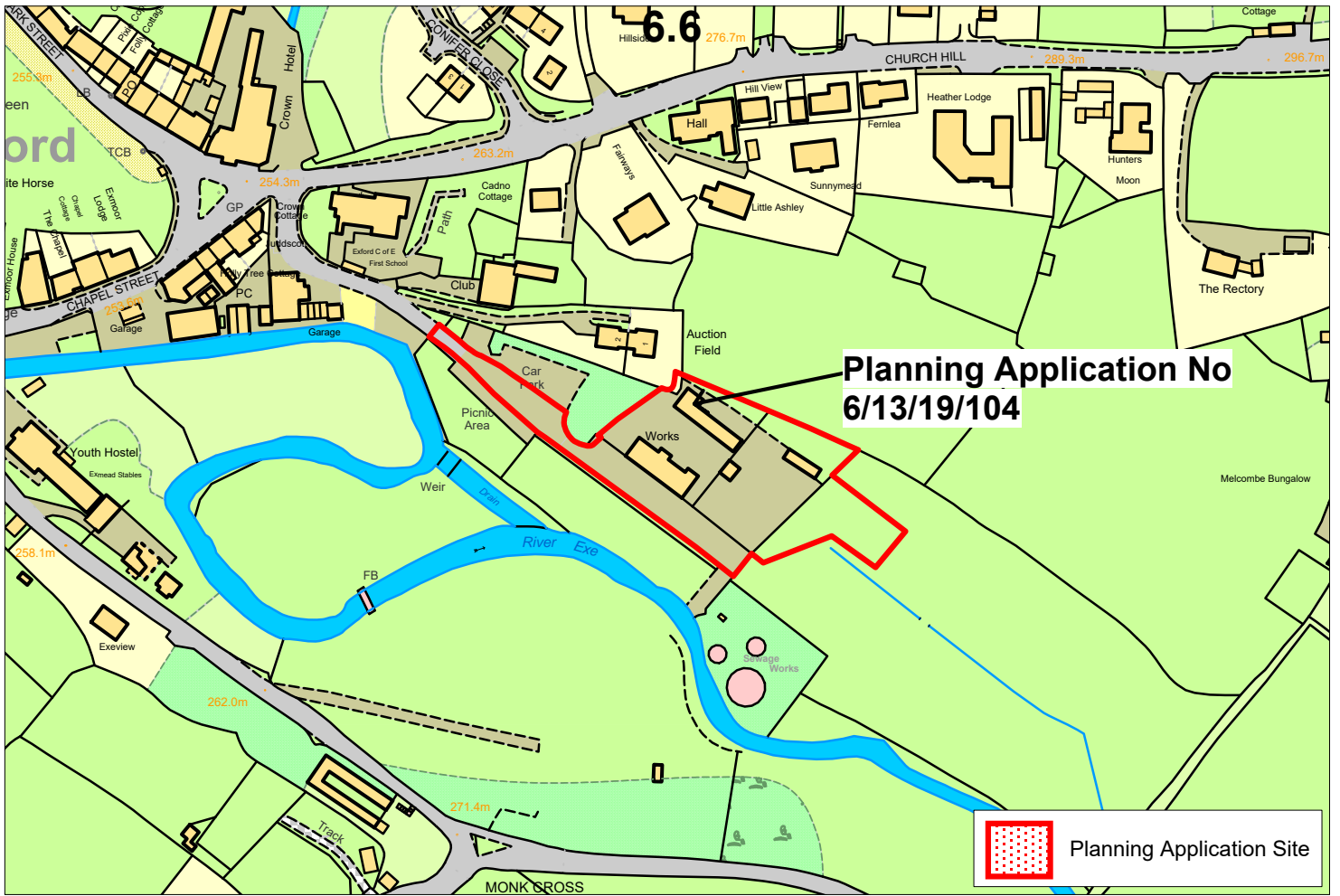
6.6

EXMOOR NATIONAL PARK AUTHORITY MEETING

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.

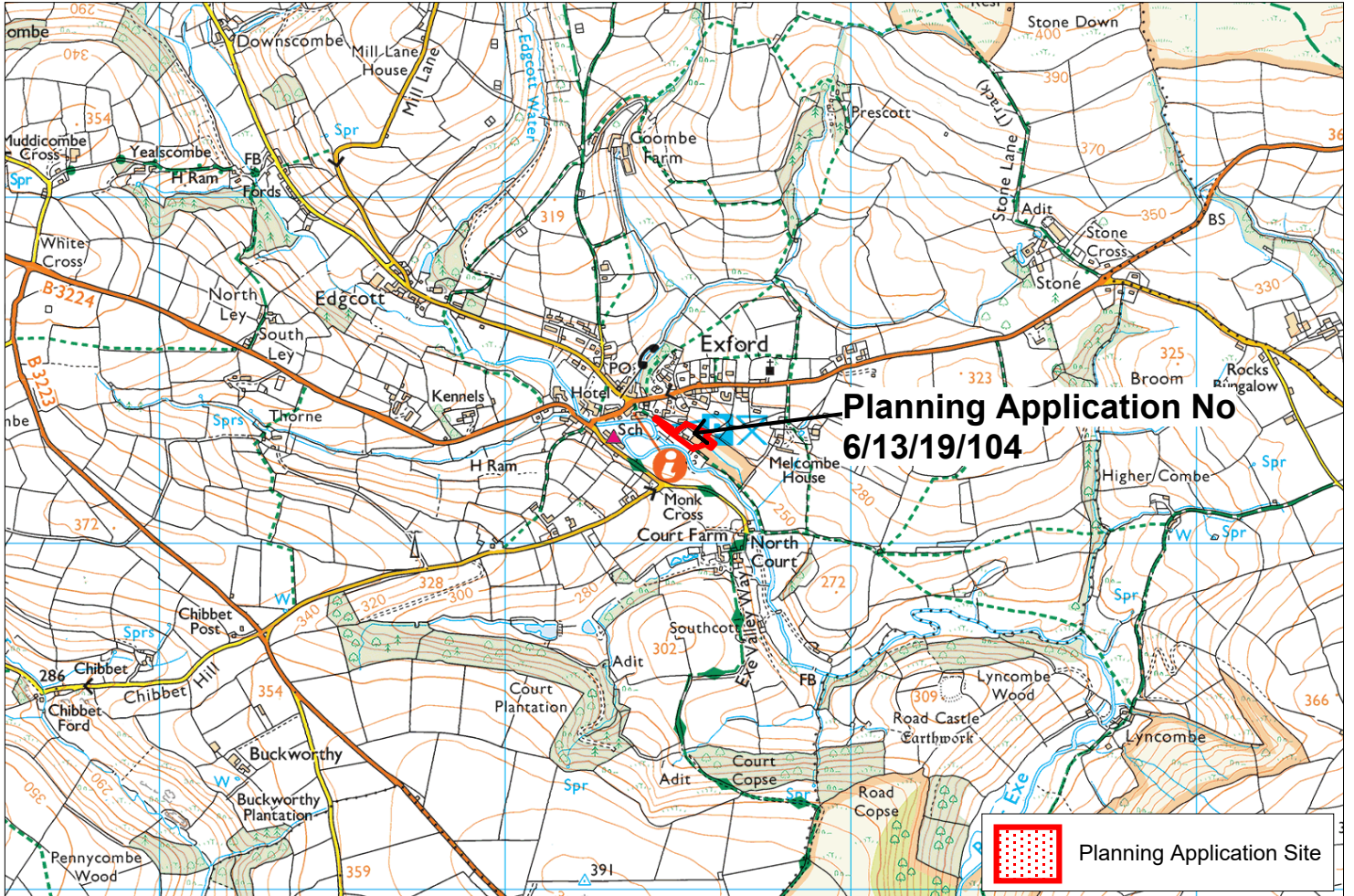
The Department of Communities and Local Government have introduced a process whereby it is now possible to apply for a non-material amendment to a permission. This can deal with changes to plans which do not fundamentally alter the form of permission but are a variation to the approval. The appropriate 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.



Site Map
1:2500

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Overview Map
1:20000

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Application decisions delegated to the Chief Executive

<u>Ref and Grid Ref</u>	<u>Applicant & Location</u>	<u>Decision and Date</u>
6/13/19/101LB SS844389	Mrs M Johnson - Listed building consent for proposed replacement of french doors and window. (Listed Building), Luckesses, Exford, Minehead, Somerset	Approved 01-Mar-2019
6/10/19/101 SS991438	Mr I Bigley - Proposed replacement of 4 no. window frames and glazing to front of property. (Householder), Priory Gate, 4 The Ball, Dunster, Somerset	Approved 04-Mar-2019
62/41/19/002 SS716492	Mr J Arthur - Proposed enlargement of existing dormer and formation of new dormer to rear elevation, together with, the formation of new door at first floor level and bridge to garden. As per additional information and plan. (Householder), 19 Park Gardens, Lydiate Lane, Lynton, Devon	Approved 01-Mar-2019
6/10/19/102LB SS991438	Mr I Bigley - Listed Building Consent for the proposed replacement of 4 no. window frames and glazing to the front of the property. (Listed Building), Priory Gate, 4 The Ball, Dunster, Somerset	Approved 04-Mar-2019
6/3/18/104 SS954314	Mr R Cowling - Proposed demolition of existing agricultural building together with the erection of an agricultural building (389sqm)(Amended description and additional information and plan). (Full), Combeland, Brompton Regis, Dulverton, Somerset	Withdrawn 04-Mar-2019
6/40/18/117 SS901375	Mr & Mrs T Merrington - Proposed change of use of existing agricultural building to a mixed use of agriculture and equestrian together with a hardcore yard and washdown area (retrospective). (Amended description) As per amended plans and information. (Full), Oldrey Bungalow, Oldrey Lane, Winsford, Somerset.	Approved 15-Mar-2019

Application decisions delegated to the Chief Executive

<u>Ref and Grid Ref</u>	<u>Applicant & Location</u>	<u>Decision and Date</u>
WTPO 19/02 SS865476	Mr M Fair - T1 Oak - fell due to large amounts of decay. (Works to trees subject to Tree Preservation Order), Brackenwood, Tor Road, Porlock, Somerset	Approved 11-Mar-2019
6/13/18/101 SS821399	Mr O Edwards - Lawful Development Certificate for the existing seasonal use of fields for camping and caravanning (1 March to 31 October). Amended description. As per additional information and amended plan. (CLEUD), Westermill Farm, Exford, Minehead, Somerset	Withdrawn 06-Mar-2019
62/63/18/002 SS800317	Mrs S Pickard - Proposed erection of two storey extension and demolition of single storey extension. (Householder), Blindwell Cottage, Twitchen, Devon	Approved 28-Feb-2019
6/23/18/102 ST072376	Mr J Stace - Proposed single storey extension to the south elevation of the property. As per amended plans. (Householder), The Green, North End Road, Monksilver, Somerset	Approved 12-Mar-2019
6/13/19/102 SS847383	Dr C Osborne - Proposed variation of condition 5 (Notwithstanding the provisions of the Town & Country Planning (General Permitted Development) Order 2015, as amended (or any order revoking and re-enacting that order with or without modification) express planning permission shall be obtained for any development within Class A of part 1 of the Schedule 2 of the order) of approved application 6/13/18/104. (Amended description). (Alteration/Lift Condition), Stockleigh Lodge, Exford, Somerset	Approved 19-Mar-2019
62/50/18/007 SS671447	Mr & Mrs Harding - Proposed change of use of stone agricultural building to dwelling together with amalgamation of existing cottage into adjoining farmhouse and the installation of septic tank to serve proposed dwelling. (Full), Sunnyside Farm, Parracombe, Devon	Withdrawn 11-Mar-2019

Application decisions delegated to the Chief Executive

<u>Ref and Grid Ref</u>	<u>Applicant & Location</u>	<u>Decision and Date</u>
6/26/18/111 ST032383	Mr R Wetheridge Roadwater Village Community Shop Limited - Proposed extension to existing shop together with resurfacing of forecourt area to include patio area. As per amended plans, additional plan and additional information. (Full), Community Shop and Post Office, Roadwater, Somerset	Approved 13-Mar-2019
62/41/19/001 SS722495	Ms C Glover - Proposed replacement of canopy roof finish. (Full), Bath Hotel, The Flat, Lynmouth Street, Lynmouth, Devon	Approved 01-Mar-2019
6/9/19/102 SS934267	Mr R Caring - Lawful Development Certificate for the existing timber frame conservatory. (CLEUD), The Game Larder Cottage, Pixton Weir, Dulverton, Somerset	Approved 13-Mar-2019
6/9/19/106 SS887304	Mr D Wallace - Proposed erection of porch. Re-submission of withdrawn application 6/9/18/104. (Householder), Mounsey Farm, Dulverton, Somerset	Approved 20-Mar-2019
6/9/19/107LB SS914279	Mr P Ogilvie - Listed building consent for the proposed replacement of existing back door. (Listed Building), 1 Church Lane, Dulverton, Somerset	Approved 20-Mar-2019
62/41/17/017 SS718493	Livewest Homes Ltd - Application to modify Section 106 Agreement under 62/41/03/018 to vary mortgagee exclusion clause. (Full), Flats 2, 3 & 5 Jubilee Court, Lynton, Devon	Approved 05-Mar-2019

Application decisions delegated to the Chief Executive

<u>Ref and Grid Ref</u>	<u>Applicant & Location</u>	<u>Decision and Date</u>
6/10/19/103 SS988433	Dr I Kelham - Proposed variation of condition 5 (The hard and soft landscape works for the development hereby approved shall be carried out strictly in accordance with those details agreed under planning permission 6/10/12/121 and shall be provided prior to the first use of the medical centre hereby approved, or such other timescale as maybe agreed in writing by the Local Planning Authority.) of approved application 6/10/15/109 to retain landscaping already carried out on site and not provide additional landscaping as previously approved to the northern boundary, including the provision of a native hedge and additional shrub planting along the leat to either side of the pedestrian access bridge. (Amended description) (Alteration/Lift Condition), Dunster Surgery, West Street, Dunster, Somerset	Withdrawn 20-Mar-2019
6/13/19/103 SS852383	Exmoor Hospitality Inns Ltd - Proposed glamping pod together with erection of raised walkway. Retrospective. (As per additional information). (Full), Exemead Youth Hostel, Exford, Somerset	Withdrawn 20-Mar-2019

EXMOOR NATIONAL PARK AUTHORITY

2 April 2019

Exmoor National Park Authority Corporate Plan 2019/20

Report of the Head of Strategy and Performance

Purpose of Report: To present to Members the draft Exmoor National Park Authority Corporate Plan for 2019/20

RECOMMENDATIONS: The Authority is recommended to:

- (1) APPROVE the Exmoor National Park Authority Corporate Plan 2019/20.
- (2) DELEGATE to the Chief Executive and Chairman authority to agree minor amendments following member discussion, and production of the final Plan.

Authority Priority: The Corporate Plan outlines the priorities for the Authority for the period to end of March 2020.

Legal and Equality Implications: Section 65(4) Environment Act 1995 – provides powers to the National Park Authority to “do anything which in the opinion of the Authority, is calculated to facilitate, or is conducive or incidental to:-

- (a) the accomplishment of the purposes mentioned in s. 65 (1) [National Park purposes]
- (b) the carrying out of any functions conferred on it by virtue of any other enactment.”

The equality impact of the recommendations of this report has been assessed as follows: There are no foreseen adverse impacts on any protected group(s). Engagement through the outreach work within the plan is designed to have a positive impact on protected groups.

Consideration has been given to the provisions of the Human Rights Act 1998 and an assessment of the implications of the recommendations of this report is as follows: There are no implications for the Human Rights Act.

Financial and Risk implications: No financial or risk implications have been identified. Performance management exerts a positive influence on financial and risk management.

1. Background

- 1.1 The 2019-2020 Corporate Plan sets out the key priorities for the Authority for the next financial year. This is the final year of the agreed four year funding period, which introduced a period of funding stability after many years of declining grant. We do not as yet know what funding we will receive after this point, consequently the Authority will use 2019/20 as a year of transition to move into a new funding era.

2. Exmoor National Park Authority Corporate Plan 2019-2020

- 2.1 The Corporate Plan is closely aligned with the Exmoor National Park Partnership Plan 2018 – 2023. This is a Statutory Plan for the National Park as a whole, for everyone who cares about Exmoor, the place, its communities and the benefits the National Park provides to the nation. The Corporate Plan sets out how the Authority will lead delivery of the Vision and Ambitions set out in the Partnership Plan, working with our partnership groups. It also closely follows the priorities set out by Defra in its *8-Point Plan for England's National Parks* and the Government's 25 year Environment Plan, to ensure the Authority helps to deliver these national objectives.
- 2.2 2019/20 is likely to be a period of change and transition for the Authority. The outcomes of Brexit negotiations are as yet unknown, but are likely to be far reaching. In the autumn we expect the *Glover Report* into National Parks and Areas of Outstanding Natural Beauty and we will need to respond to its recommendations.
- 2.3 Against this background of change and uncertainty we will need to continue to deliver effective and efficient services while taking forward a number of specific priorities in the year ahead. Our knowledgeable and dedicated staff team are a key resource in ensuring we deliver this Corporate Plan. We will continue to assess and review our operations to improve the service provided and ensure we work efficiently and effectively.
- 2.4 We will continue to work with partners on a range of innovative projects across the National Park. In particular: we hope to be working with Defra and others to help trial the New Environmental Land Management Scheme; completing a review of the Authority's assets; continuing restoration work at White Rock Cottage and Ashcombe gardens; developing our research priorities, including on the local economy, game shoots and heather moorland; encouraging opportunities for wildlife enhancement and implementing a programme of control of invasive species; promoting local food and international tourism; continuing to improve our Outreach and Get Involved programmes particularly around the 2019 Year of Green Action, and leading celebrations of the 70th anniversary of the National Parks and Access to the Countryside Act.

3. Monitoring progress

- 3.1 The Authority carries out a six month progress update and at the end of each financial year completes an annual performance review. This provides information about the progress made in delivering the actions in the Corporate Plan, together with achievement against the Authority's set of performance indicators.

Clare Reid

Head of Strategy and Performance

April 2019

Appendix 1 Draft Exmoor National Park Authority Corporate Plan 2019-2020



**Exmoor National Park Authority
Corporate Plan
2019-2020
DRAFT**

Exmoor National Park Authority Corporate Plan 2019-2020

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Welcome to the 2019/20 Exmoor Corporate Plan

Last year we launched our 2018 - 23 Partnership Plan for Exmoor. The Partnership Plan sets out how we will work with our partners, local communities, businesses and user groups to further National Park purposes. This document, our “*Corporate Plan*” details how we will help to achieve the priorities in the Partnership Plan over the coming year.

2019/20 year is likely to be a period of change and transition for the Authority. The outcomes of Brexit negotiations are as yet unknown, but are likely to be far reaching. In the autumn we expect the *Glover Report* into National Parks and AONBs and we will need to respond to its recommendations. Against this background of change and uncertainty we will need to deliver effective and efficient services while taking forward a number of specific actions in the year ahead.

We will need to work closely with farmers, foresters, and the team at *Defra* to help shape the *New Environmental Land Management Scheme*, which will be critical to the future management of our landscape, environment, our land based economies and tourism industry. We will work with partners to explore opportunities to enhance wildlife and to expand our work in controlling non-native invasive species.

We will continue to deliver Defra’s 8 Point Plan through a targeted outreach programme, development of volunteering opportunities and joint working with others to maximise the benefits of Exmoor’s environment on people’s health and well being.

We will complete a review of our Assets which currently includes over 24 buildings, 600 hectares of woodland and 4,225 hectares of moorland, to ensure that we are making the most of these resources. As a first step in improving these assets, we will be working with the local community and volunteers to restore White Rocks cottage and the “lost gardens” at Ashcombe.

We be looking closely at our programmes of research and monitoring to ensure that we understand the state of Exmoor and are aware of changes in the landscape and economy. This will include research into the management of heather moorland, impacts of commercial pheasant shooting and the scale and nature of Exmoor’s businesses, all of which have emerged as priorities in the Partnership Plan.

As this year is the final of our 4 year funding settlement, we will be focussing on ensuring that the Authority is in a good shape and firm financial footing to meet the opportunities and challenges ahead.

And of course we particularly look forward to celebrating 70 years of National Parks, with our committed staff team, with our residents and visitors, our many partners and friends, both on Exmoor and across the family of National Parks.

Sarah Bryan
Chief Executive

Robin Milton
Chair of the Authority

The Role of Exmoor National Park Authority

National Park Authorities fulfil two statutory purposes established within the Environment Act 1995:

- To conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park
- To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public

In taking forward these two purposes, we have a duty to seek to foster the economic and social well-being of local communities within the National Park.

Our 22 Members have responsibility for setting the strategic direction of the Authority and ensuring we achieve our objectives through effective use of our resources:

- 12 are appointed by the County and District Councils with land within the National Park
- 5 are nominated by and elected from the Parish Councils within the National Park
- 5 are appointed by the Secretary of State for Environment, Food and Rural Affairs

Members meet monthly as an Authority to consider priorities and make decisions relating to our duties as a National Park Authority, including determining planning applications for development on Exmoor. These are public meetings that anyone can attend.

We employ a team of around 60 core staff but we additionally employ project and seasonal staff, deliver through partnerships and through shared services. Our knowledgeable and dedicated staff team are a key resource in ensuring we deliver this Corporate Plan. Working with partners and sharing services not only helps us make the best use of our resources but also benefits all parties through shared learning and understanding.

The Corporate Plan is closely aligned with the Exmoor National Park Partnership Plan 2018 – 2023. This is a statutory Plan for the National Park as a whole: whilst led by the Authority, it is a Plan for everyone who cares about Exmoor, the place, it's communities and the benefits the National Park provides to the nation. The Corporate Plan sets out how the Authority will lead delivery of the Vision and Ambitions set out in the Partnership Plan, working with our partnership groups.

Much of what we do would simply not be possible without our partners, local communities, interest groups and volunteers. We are committed to working closely with others to deliver National Park purposes and protect the special qualities of Exmoor. We will continue to develop close working relationships with local businesses and communities alongside our regional and national partners, and provide opportunities for people to get involved in the delivery of our plans.

Regular meetings of the Exmoor Consultative and Parish Forum provide a forum for consultation and discussion about matters affecting the National Park and an opportunity to promote understanding between the Authority, local communities and other bodies with an interest in the National Park. The Forum meets at different venues across the National Park and members of the public are welcome to attend.

Monitoring progress

The Authority carries out a six month progress update and at the end of each financial year completes an annual performance review. This provides information about the progress made in delivering the actions in the Corporate Plan, together with achievement against the Authority's set of performance indicators.

What We Do to Deliver National Park Purposes	
Conservation Projects and Programmes	Developing projects to help conserve and enhance Exmoor's landscape, wildlife and cultural heritage, working with farmers, woodland owners, game shoot managers, conservation organisations, the local community and the general public.
Public Rights of Way and recreation	Maintenance and improvement of the 986km of rights of way on Exmoor, picnic sites and access land and promotion of the diverse range of recreational activities and opportunities available
Ranger Service	Public access management and liaison with land managers and recreational users of the National Park to promote and conserve its special qualities and help to manage the impacts of public recreation on Exmoor's special qualities
Public Facilities	Maintenance and improvement of Authority owned picnic sites, toilets and car parks
Education/Volunteers/Outreach	Provision of formal and informal education, training, volunteer opportunities and greater involvement of non-traditional users, including health and wellbeing initiatives
Information/Interpretation	Information and interpretation of Exmoor's special qualities through publications, website, social media, display boards
National Park Centres	Centres in Lynmouth, Dulverton and Dunster providing information about Exmoor National Park, with informative displays, maps, publications and staff with specialist knowledge about the area
Sustainable Economy	Engagement with business sector and local communities and liaison with local authority economic development services to help sustain a thriving economy on Exmoor
Development Management	Ensuring that development is of the right scale, directed to appropriate locations and conserves and enhances the character and appearance of the National Park
Planning Policy	Support to communities, neighbourhood planning and policy guidance, including development and implementation of Local Plan policies
Land Management	Management of Authority land for landscape, wildlife and recreation benefits. Opportunities to demonstrate best practice and emerging land management techniques.

Corporate Plan at a Glance

Graphic to be inserted

People

Exmoor for all: where everyone feels welcome

- **The Exmoor Experience**
- **Well-managed Recreation and Access**
- **Thriving Tourism built on Sustainability**

Place

Inspiring Landscapes: diverse and beautiful, rich in wildlife and history

- **Celebrated Landscapes**
- **Wildness and Tranquillity with Dark Night Skies, and Sensitive Development**
- **Valued Historic Environment and Cultural Heritage**
- **Rich in Wildlife**

Prosperity

Working landscapes: thriving communities and a vibrant local economy

- **Working Landscapes**
- **Strong Local Economy**
- **Thriving Communities**
- **A Valued Asset**

Monitoring and Research

Corporate Priorities

- **Transition to a new funding era**
- **Work with communities, businesses and partners to deliver the National Park Partnership Plan and statutory purposes**
- **Develop and maintain effective and efficient services**
- **Manage the Authority's Estate and operations to support delivery of National Park purposes**

PEOPLE

This section sets out how the Authority will work to ensure that Exmoor is for all, and where everyone feels welcome.

The Exmoor Experience

Partnership Plan Ambition: More people enjoy Exmoor, are inspired, get involved, and learn about its special qualities

We have a simple ambition for Exmoor National Park: to enable as many people as possible to feel connected to Exmoor's landscape, whether they come from near or far. That way, they can learn more about the National Park, perhaps get involved through volunteering, acquire new skills, have fun, enhance their wellbeing and help to maintain Exmoor's special qualities.

We will:

1. Promote and support a wide range of volunteering opportunities that deliver National Park purposes through the Get Involved Programme and working with partners.
2. Promote the health and well-being benefits that Exmoor provides, including support for the naturally healthy month in May 2019. Deliver targeted programmes of nature based interventions to enhance health and well-being of communities in Bridgwater (Hamp Estate) and Taunton (Halcon Estate).
Throughout the document, a few actions will be illustrated with pictures and additional information as shown in the right hand box
3. Deliver the Learning and Outreach Service (including Pinkery Centre for Outdoor learning) engaging with young people and professional staff teams.
4. Provide National Park Centres at Lynmouth, Dunster and Dulverton.
5. Deliver a range of public engagement events including Big Adventures, Family Campouts, Historic Building Festival (Sept 2019), Dark Skies Festival (Oct/Nov 2019), and attend local shows.
6. Deliver Families United through Nature (FUN) Project.

The National Park works with a range of partners to match volunteers with projects that support National Park purposes. From family volunteering to traditional practical conservation projects, the Get Involved Project has opportunities for everyone.

Recognised by Public Health England as an 'honorary public health specialist', the National Park Authority works extensively with public health and social care partners to promote the benefits of nature-based interventions to enhance physical and mental health and wellbeing.

Well-managed Recreation and Access

Partnership Plan Ambition: Exmoor has a first class rights of way network. Our paths, open access and recreational facilities are enhanced to offer more and better experiences for people who want to explore and enjoy the National Park

Maintaining Exmoor's high-quality network of paths and recreational facilities requires significant levels of resource each year. In addition, we are continually looking to offer more and better experiences for people who want to explore and enjoy the National Park. While there are great opportunities to promote enjoyment of the National Park, and the number of visitors to Exmoor can generally be accommodated without significant impact, there are some popular countryside visitor locations and settlements where pressures need to be carefully managed to ensure that public enjoyment is enhanced while minimising negative impacts

We will:

7. Maintain the Public Rights of Way network on Exmoor, ensuring that at least 95% are open and easy to use and that key permitted paths and access land are available. Ensure the network meets the modern needs of all users through a range of legal, practical and information based activities.
8. Carry out a range of major path repairs that help to reduce sediment run off, and also benefit public use, partly supported through the Headwaters of the Exe project.
9. Assist Natural England with the implementation of the England Coast Path on Exmoor through surveys, landowner negotiation and ground works project implementation.
10. Promote at least 10 short, accessible walks with clear, high quality information in order to assist new visitors with an introduction to Exmoor.
11. Carry out a feasibility study into the potential to create new family friendly cycle trails within or linking to the National Park. Take to planning permission stage if possible.
12. Complete fundraising for Woodside Bridge and 'Great Bradley Bridge', agree permissions and implement works if funding and permissions allow.
13. Provide support, guidance and monitoring for large public recreational events to help ensure they do not unduly affect others enjoyment or normal economic activity.
14. Continue ongoing management of our most popular locations including public liaison to ensure that they offer an enjoyable visitor experience without being damaged.

Thriving Tourism Built on Sustainability

Partnership Plan Ambition: The tourism economy is vibrant, innovative and growing, and celebrates Exmoor's distinctive character

Tourism is of fundamental importance to Exmoor. It contributes to the economic and social vibrancy of our communities. With that in mind, we seek to sustainably extend the value that tourism brings to the local economy, making sensitive use of the National Park's special qualities and retaining high levels of visitor satisfaction.

We will:

15. Complete initial project developing English National Park Experience Collection, seeking opportunities to bolster project activity locally to secure long-term benefits from increased international and domestic visitors.
16. Develop and deliver a pilot series of short activity breaks available to the public at Pinkery.
17. Continue Ranger Experience Days pilot for a further year, evaluating before committing to long term proposals.
18. Celebrate Exmoor's literary associations through promotion of local activities to mark the 150th anniversary of the Lorna Doone publication.
19. Initiate further work to support Astro Tourism opportunities supporting local businesses (utilising Interreg funding through AtlanticNetSky Project if available).
20. Develop Phase 2 of the Eat Exmoor project focusing on supporting local retailers in promoting and adding value to local produce. Work with the industry to highlight food events with a strong local produce focus. Further develop the CareMoor Dining Club working with local businesses to offer a series of dining events featuring Exmoor produce in aid of CareMoor for Exmoor.
21. Develop a revised programme of 'green tourism' training for local tourism providers.

PLACE

This section outlines how the Authority will work with partners to ensure that Exmoor continues as a place of living, inspiring landscapes that are diverse and beautiful, rich in wildlife and history.

Celebrated Landscapes

Partnership Plan Ambition: The natural beauty, distinct character and diversity of Exmoor's landscapes are celebrated, conserved and enhanced

Exmoor is remarkable, even among other National Parks, for the very diversity of its landscapes. It is the natural beauty of these landscapes that justifies Exmoor's status as a National Park, and is the primary draw for visitors. Exmoor's magnificent landscapes have changed over time and will continue to change. We want to ensure these beautiful places continue to be looked after, celebrated and understood.

We will:

22. Co-ordinate a range of activities to contribute to 2019 Year of Green Action and help celebrate the 70th anniversary of the National Parks and Access to the Countryside Act 1949.
23. Develop a programme to understand and halt if possible the loss of heather moorland.
24. Complete the renovation of White Rock Cottage and commence a programme of works to restore Ashcombe gardens. Work with the local community and partners to support establishment of a Trust to take on future responsibility for the site.
25. Scope and develop enhancement projects of the natural and built environment, including on our own land at Culbone and North Hill, and working with partners.
26. Develop measures to replace character trees outside woods in response to disease and other pressures. Work with CareMoor and local initiatives to raise and allocate funds for new landmark trees in prominent locations.

Wildness and Tranquillity with Dark Night Skies, and Sensitive Development

Partnership Plan Ambition: Exmoor is somewhere you can experience tranquillity, openness, wildness and dark night skies. Development is sensitive to the National Park's special qualities and conserves its scenic quality and setting

National Parks are our breathing spaces, and Exmoor is one of the few places in southern Britain where you can enjoy remoteness, wildness and tranquillity via its diverse landscapes and a dark night skies. Within the National Park, planning policies help to ensure that necessary development can be accommodated, while protecting the essential character of this very special place. We want to ensure that Exmoor's wild and tranquil character and its dark night skies are preserved; and that development, land management, and recreation are sensitive to Exmoor's special qualities and enhance these qualities wherever possible.

We will:

27. Promote and raise awareness of the Landscape Character Assessment to help guide development and land management change. Use this to evidence forces for change, threats and identify opportunities to conserve landscape quality.
28. Continue to use Exmoor's Dark Skies Reserve status to educate and raise awareness, including through guidance and promotion of exemplar projects.
29. Establish a Design Group to work with the Authority to encourage high quality, locally distinctive design in the National Park which conserves and enhances the National Park.

Valued Historic Environment and Cultural Heritage

Partnership Plan Ambition: Exmoor's historic environment is better understood, cared for and protected. Its cultural heritage and rural traditions are valued for their place in telling Exmoor's story and shaping its future

Exmoor's historic landscapes provide a record of how people have lived here for thousands of years. Exmoor is particularly important because there are so many undisturbed archaeological sites and monuments and probably more to be discovered. We want to ensure that the whole of Exmoor's historic environment, cultural landscapes, customs, and traditions are understood, well-managed and better protected.

We will:

30. Undertake conservation works to monuments at risk via the Historic England part funded Monuments Management Scheme.
31. Complete Conservation Area Assessments and Listed Building condition surveys.
32. Promote the new Historic Environment Record (HER) website and undertake an audit of the HER to ensure that it continues to meet nationally agreed standards.
33. Increase understanding of the historic environment by completing phase 2 of the rapid coastal zone assessment study, and research through the Mires restoration programme.

Rich in Wildlife

Partnership Plan Ambition: Exmoor is richer in wildlife. Habitats are in good condition, expanded, connected, and support a greater abundance of species

Exmoor's spectacular range of wildlife and habitats is one of the key attractions for people visiting the National Park, and is also highly valued by people living and working here. Thanks to careful management by farmers and land managers, much of Exmoor's wildlife is faring well compared with other parts of the country. But there are many forces for change and threats affecting Exmoor's wildlife, some of them global, others very localised in effect. While we may not have control over all of these impacts, we need to understand and be aware of these changes so that we can respond and adapt to them for the future. We need to ensure that Exmoor's wildlife is in good condition, well

connected, and resilient so that we can pass on the richness and diversity of habitats and species to future generations.

We will:

34. Encourage opportunities for wildlife enhancement by developing and promoting a vision for ecological recovery networks on a landscape scale, including woodland planting and enhancement opportunities.
35. Commence a new two year Exmoor Non-native Invasive Species (ENNIS) Project funded by the Water Environment Grant including trials of organic knotweed control methods, carrying out practical work with volunteers such as Himalayan balsam clearance and signal crayfish control.

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PROSPERITY

This section outlines how the Authority will work with our partners to encourage prosperity in Exmoor, with thriving communities and a vibrant local economy.

Working Landscapes

Partnership Plan Ambition: Exmoor's land-based communities and businesses are supported to provide healthy food and good quality timber, and ensure that Exmoor's landscapes continue to be well managed and cared for

Exmoor's landscapes have been created through the interaction of people and nature over centuries. But there are many challenges ahead, particularly the uncertainty over future policy and funding, the viability of many upland farm businesses. We need to ensure that Exmoor's land managers are prepared for the future through collaborative working, innovation and marketing, supporting good quality local produce from Exmoor and ensuring that land management continues to provide a balanced contribution to Exmoor's special qualities and local economy. We also need to continue to support Exmoor's iconic local breeds, Red deer and Exmoor ponies.

We will:

36. Work with Defra to help develop the New Environmental Land Management Scheme (NELMS) in partnership with Exmoor Hill Farming Network and woodland managers.
37. Work with game shoot managers and others to help ensure game shoots provide a positive overall impact on Exmoor's special qualities through a strategy of better information, encouraging good practice and improved communication.
38. Promote benefits of increased local sustainable timber production including products and markets, through development of Grown in Britain on Exmoor.
39. Complete delivery of the Exmoor Landscape Conservation Grant Scheme and work with Devon and Somerset Hedge Groups to support hedgerow management.
40. Work with partners to investigate opportunities for integrated catchment management to ensure that Exmoor's rivers, streams and associated catchments are in good condition.
41. Continue delivery of the Headwaters of the Exe project through advice and grant aid to farmers and woodland managers to help maintain and improve the management of water and deliver multiple benefits to the environment and communities.
42. Help promote and conserve the iconic Exmoor Pony breed through delivery of the Exmoor Pony genome project and management of the Authority's pony herds.
43. Provide continued Countryside Stewardship advice to enable land managers to make informed applications that support delivery of National Park purposes.
44. Assist and advise land owners with swaling and undertake swales on ENPA land. Monitor and report on annual swaling activity.

Strong Local Economy

Partnership Plan Ambition: The local economy is more sustainable with increased innovation, entrepreneurship and improved economic prospects

Exmoor has always been home to entrepreneurs and innovators, and it is important that this continues, where consistent with National Park purposes. We are keen to support new ideas and investment and to encourage sustainable economic activity in the National Park, which supports National Park purposes and builds resilience.

We will:

45. Deliver a research project on Exmoor's Economy to provide enhanced business intelligence, informing future work programmes and a more integrated approach to economic support and development management work.
46. Contribute to collective work with English National Parks to influence post-Brexit Rural Development funding opportunities in National Parks.

Thriving Communities

Partnership Plan Ambition: Exmoor's local communities are thriving with strong connections to the National Park

There is a strong sense of identity and community on Exmoor, which contributes to the sense of place and fosters a spirit of self-sufficiency. But these communities face significant challenges including an ageing population, the cost of housing, and lack sustainable transport. We want to ensure that Exmoor's communities are thriving, rural services and facilities are sustained in the National Park's settlements and surrounding towns, and that there is high-quality development.

We will:

47. Deliver a small grants programme via the Partnerships Fund supporting community efforts to further National Park Purposes.
48. Provide support to communities including community planning, Exmoor Rural Housing Network and rural housing initiatives to secure community facilities and support delivery of affordable housing on Exmoor.
49. Support implementation of the Local Plan, advising on policy and producing guidance including on rural worker dwellings. Work with neighbouring authorities and partners to fulfil Duty to Co-operate requirements. Produce the Authority Monitoring Report and carry out a review of affordable housing provision.
50. Work with the police and other agencies to combat rural crime particularly poaching, unauthorised off-road driving and fly-tipping.

A Valued Asset

Partnership Plan Ambition: Exmoor is celebrated for the value it brings to the region and nationally

National Parks are national assets, and we want to ensure that the value Exmoor brings to the wider region and nationally is recognised and enhanced. As a working landscape, Exmoor's distinctive natural and cultural assets provide key public benefits. Our focus is on understanding and valuing the different services and benefits that the environment provides, and seeking investment to maintain and enhance them for the future.

We will:

51. **Support collective initiatives across the National Park family and respond to national policy initiatives including the outcome of the Glover Review of Protected Landscapes. Commence preparations and planning for hosting the National Parks Conference in 2021.**
52. Work with Exeter University and Dartmoor National Park Authority to carry out an audit of Natural Capital on Exmoor and investigate options for future application of natural capital approaches.
53. Encourage greater use of the Exmoor 'Dream Discover Explore' brand by local businesses.
54. Work with Heart of the South West (HotSW) Local Enterprise Partnership (LEP) Joint Committee to contribute to and benefit from sub-regional economic work.

Monitoring and Research

Partnership Plan Ambition: Our knowledge and understanding of Exmoor's special qualities is increased through monitoring and research to inform future decision making and delivery of our Ambitions

We can only achieve the National Park purposes if we understand what makes Exmoor special, the issues and challenges facing these special qualities, and the opportunities for conserving and enhancing them, celebrating and telling their stories. In light of potential future changes to funding we also need to ensure that decisions are made on the basis of the best available evidence so that we can make the most of the funding and resources available.

We will:

55. Continue to monitor Exmoor's special qualities (through undertaking our own monitoring and gathering data from other sources), to feed into performance monitoring and State of Park reporting. Review the State of Park Monitoring Framework and support new monitoring and research to address gaps in information.

CORPORATE PRIORITIES

This section outlines the corporate priorities for the Authority and how we will work to deliver the Corporate Plan and wider Partnership Plan Ambitions.

Corporate Priority: Transition to a new funding era

This year is the last of a four year funding settlement agreed by Government. We do not yet know what the future funding commitment will be, and also what the outcome of external factors such as Britain leaving the European Union, and the outcome of the Glover Review of Protected Landscapes. Therefore, this year will be a period of change and transition.

We will:

56. Undertake the necessary financial planning and analysis to ensure that the Authority is in a position to enter a potentially less stable funding era. The organisational and service impact of this will be led by the Leadership Team.
57. Increase income from the 'CareMoor for Exmoor' fundraising scheme, and continue to explore potential initiatives with the public sector, to support delivery of National Park purposes.
58. Build on successful initiatives to grow our income base through our services, commercial partnerships and business ventures, delivering National Park purposes.
59. Undertake a review of procurement to ensure that policies and practices remain up to date in the developing legislative framework, and provide relevant training for staff.

Corporate Priority: Work with communities, businesses and partners to deliver the National Park Partnership Plan and statutory purposes

We know that achievement of our Ambitions can only be done in partnership. We will continue to work collaboratively with a wide range of organisations, land managers, local communities, businesses, and volunteers.

We will:

60. Lead the implementation of the National Park Partnership Plan, working with the Partnership Groups, local communities, businesses and user groups.
61. Review the Exmoor Consultative and Parish Forum to refresh and strengthen links and co-operation with all parish councils in the National Park, representatives of local organisations and individuals.
62. Continue to support Exmoor Hill Farming Network and Exmoor Young Voices to engage with farming communities and young people.

Corporate Priority: Develop and maintain effective and efficient services

Our knowledgeable and dedicated staff team are a key resource in ensuring we deliver this Corporate Plan. We will continue to assess and review our operations to improve the service provided and ensure we work efficiently and effectively.

We will:

63. Build a more positive perception of the planning service through implementing a new planning application management system, and consider improvements to ways of working and communications.
64. Continue to develop online resources and simplify processes both internally and for the customer. This includes reviewing the website and developing a new intranet to internally manage documents and information.
65. Develop and support our staff team to enable the best use of our knowledge, skills and experience in delivering National Park purposes. Complete the Job Evaluation review process. Continue to review and update our HR policies and procedures, and ensure the Authority's processes and staff continue to meet the requirements of the General Data Protection Regulations.
66. Provide opportunities for young people interested in a career with National Parks through short study/work placements, paid apprenticeships and internships. Work with English National Parks to develop appropriate apprenticeship standards for careers in countryside land management.
67. Provide a comprehensive support service for Authority Members including administration of Authority Meetings, Member Training and Study Tours.

Corporate Priority: Manage the Authority's Estate and operations to support delivery of National Park purposes

The National Park Authority's estate extends to some 5,000 hectares and includes moorland, farmland, woodland, a farmstead, an historic sawmill, public conveniences, car parks, National Park Centres, Exmoor House, Exford Depot and the Pinkery Centre. The effective management of these assets is an important element of how we support delivery of National Park purposes.

We will:

68. Complete a review of the Authority's assets to inform future decisions on management, acquisitions and disposal.
69. Consider and agree future options for Pinkery Centre for Outdoor learning.
70. Develop a pilot management plan for ENPA owned land assets demonstrating enhanced provision of public goods underpinned by natural capital principles.

71. Undertake exemplary management of the ENPA estate to optimise the delivery of National Park purposes, through working with tenants and wider stakeholders. Continue to manage the ENPA Woodland Estate in line with the Vision and Objectives laid out in the 2017 – 2042 Woodland Strategy to ensure that Countryside Stewardship targets are met, partnerships with Plantlife and Butterfly Conservation deliver agreed outcomes and volume of timber produced is maintained or increased.
72. Continue ongoing maintenance programme for the Authority's estate, implement priority maintenance projects and complete planned major works.
73. Produce a strategy to reduce use of single-use plastics across the Authority's operations as part of our on-going commitment to managing our operations sustainably.

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Use of our resources

The summary **Medium Term Financial Plan** set out below provides a projection of Authority income and expenditure to 2023/24.

The four year period to 2019/20 introduced a period of funding stability after many years of declining grant. We do not as yet know what funding we will receive after this point but our Medium Term Financial Plan assumes that the grant will continue to grow at the same rate. Whatever funding is provided, the Authority will be working hard to use the resources available to implement the Partnership Plan and work with Defra to deliver their priorities for England's National Parks.

	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
	Original	Projected	Projected	Projected	Projected	Projected
	£'000	£'000	£'000	£'000	£'000	£'000
<u>Income</u>						
National Park Grant Income (Defra)	3,157	3,211	3,266	3,322	3,378	3,435
- Fees - planning,	85	88	88	88	88	88
- Fees - car parks	55	60	60	60	60	60
- Interest earned	18	20	20	19	18	17
- Rents & Contributions	286	286	286	286	286	286
- National Park Centre Sales Income	92	92	95	98	101	104
- Grants	10	10	10	10	10	10
- Rights of Way Income	50	50	50	50	50	50
- Pinkery Trading Income	130	155	160	165	170	175
- Other	15	13	13	13	13	13
Total:	741	774	782	789	796	803
Total Income	3,898	3,985	4,048	4,111	4,174	4,238
<u>Expenditure</u>						
Core budget - Pay						
Current Establishment (excluding Pinkery)	2,124	2,192	2,247	2,303	2,361	2,420
Pension Costs - Fixed Element	140	140	140	140	140	140
Target Pay Budget	2,264	2,332	2,387	2,443	2,501	2,560

Core budget Non-Pay						
Member costs	92	94	96	98	99	100
Premises costs	184	185	187	189	191	193
Insurance	46	46	46	46	46	46
Travel / vehicle costs	109	108	110	112	114	116
Equipment	51	61	61	61	61	61
Contracted work (e.g. audit fees, legal services)	243	245	247	249	251	253
Grants and contributions	11	11	11	11	11	11
Subscriptions	34	38	38	38	38	38
National Park Centre Cost of Goods Sold	55	56	58	60	62	64
Consumables	82	76	77	78	79	80
ICT Expenditure	63	63	64	65	66	67
Communications	36	36	36	36	36	36
Toilet & car park costs	93	93	94	95	96	97
Pinkery	130	155	160	165	170	175
Total non-pay budget	1,229	1,267	1,285	1,303	1,320	1,337
Total Core Budget	3,493	3,599	3,672	3,746	3,821	3,897
Programmes, Partnerships & Contributions to Reserves						
Contributions to Reserves	210	188	226	214	203	191
Top Sliced Programmes	145	148	101	101	101	101
Partnership Fund - small grants scheme	50	50	50	50	50	50
Total available Programmes & Partnerships Budget	405	386	377	365	354	342
Total expenditure	3,898	3,985	4,048	4,111	4,174	4,238

EXMOOR NATIONAL PARK AUTHORITY

2 April 2019

ANNUAL GOVERNANCE REVIEW

Joint Report of the Solicitor and Monitoring Officer & Chief Finance Officer

Purpose of Report: To report compliance with the Authority's Code of Corporate Governance and consider the Annual Governance Statement.

RECOMMENDATIONS: The Authority is recommended to:

- APPROVE the Annual Governance Review; and
- APPROVE the Annual Governance Statement as set out in the attached Appendix for inclusion with the Annual Accounts for 2018/19.

Authority Priority: Achieve Best Value from our resources and improve our performance.

Legal and Equality Implications: Local Government Act 2003, Parts 1-3 (Capital Finance, Financial Administration and Grants), and Sections 1-39

Accounts and Audit (England) Regulations 2011, Sections 4 (Responsibility for Financial Management), 5 (Accounting Records and Control Systems) and 6 (Internal Audit).

High standards of corporate governance are essential in ensuring all business is transacted lawfully and with propriety.

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: The report has no financial implications but the risks to the Authority could be substantial for non-compliance with the Code.

1. INTRODUCTION

- 1.1 Sound governance arrangements and accountability are critical to the Authority to fulfil National Park purposes, deliver the intended outcomes in the National Park Partnership Plan and the Corporate Plan and operate in an effective, efficient and ethical manner. Good governance leads to good management, good performance, good stewardship of public money, good public engagement and ultimately good outcomes for the public and service users.
- 1.2 The Authority has endorsed the "Delivering Good Governance in Local Government Framework (2016)" that has been produced by CIPFA (Chartered Institute of Public Finance and Accounting) and SOLACE (Society of Local Authority Chief Executives and Senior Managers) which has the support of the Department for Communities and Local Government.

- 1.3 The CIPFA/SOLACE framework is based on the following seven core principles of good governance:
- A. Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law.
 - B. Ensuring openness and comprehensive stakeholder engagement.
 - C. Defining outcomes in terms of sustainable economic, social, and environmental benefits.
 - D. Determining the interventions necessary to optimise the achievement of the intended outcomes.
 - E. Developing the entity's capacity, including the capability of its leadership and the individuals within it.
 - F. Managing risks and performance through robust internal control and strong public financial management.
 - G. Implementing good practices in transparency, reporting, and audit to deliver effective accountability.

1.4 These seven principles are reflected in the Authority's Code of Corporate Governance. The CIPFA/SOLACE Framework sets out a number of supporting principles for each of the seven core principles and these are translated into a range of governance arrangements that the Authority has in place. This report summarises the Authority's compliance with these principles during 2018/19.

2. A. Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law

2.1 The governance arrangements the Authority has in place to achieve these principles are:

- codes of conduct which define the standards of conduct and personal behaviour to which members, staff and agents of the Authority are required to subscribe.
- an effective Standards Committee.
- arrangements and mechanisms to ensure all codes of conduct continue to operate in practice, to ensure that members and staff are not influenced by prejudices, bias or conflicts of interest in dealing with the public and stakeholders.
- arrangements for reporting concerns at work (whistleblowing) which are accessible to all staff and contractors.
- shared values to act as a guide for decision making and as a basis for developing positive and trusting relationships within the Authority.
- member training and induction.
- a register of gifts and hospitality and comply with anti- bribery and money laundering legislation.
- partnerships underpinned by a common vision that is understood and agreed by all partners.

2.2 In year Commentary

- (i) Following the abolition of the Standards Board through the Localism Act 2011, new arrangements have been implemented and were approved in June 2012. The Authority has also appointed an 'Independent Person' to provide an external perspective on any investigations undertaken by the Standards Committee. Guidance on member interests and adoption of a new Code of Conduct have been approved by full Authority.
- (ii) The Whistleblowing Policy was recently reviewed and no changes have been considered necessary in recent years.
- (iii) An annual reminder is sent to all staff reminding them of their responsibilities and the requirement to comply with all policies, procedures, standing orders (including contract standing orders) and financial regulations.

3. B. Ensuring openness and comprehensive stakeholder engagement

3.1 The governance arrangements the Authority has in place to achieve these principles are to:

- meet on a regular basis with meetings open to the public except where reasons of commercial or individual confidentiality require the meeting to be closed.
- undertake a number of parish consultative committees throughout the year as a forum for discussing common issues.
- engage with local councils and the Local Enterprise Partnership to ensure that National Park priorities are heard.
- produce effective consultation and communication arrangements.
- undertake regular surveys of visitors and businesses to ensure that balanced and representative opinions are available to inform decision making.
- enable a complaint or request for information regarding any aspect of the Authority's activities to be easily lodged and to ensure it is properly addressed.

3.2 In year Commentary

- (i) Extensive consultation arrangements are in place. The Corporate Plan continues to compare performance against the objectives set for the previous year and sets the targets for the forthcoming year.
- (ii) During 2018/19, the Partnership Panel and Partnership Groups continued to operate. Together with Authority representatives the Partnership Groups enable progress to be monitored and further opportunities for co-operation between these Partnership Groups in support of Partnership Plan action plans and further partner engagement to be realised.
- (iii) The Authority continues to consult widely with interested parties and holds a number of meetings of the Exmoor Consultative and Parish Forum at which questions relating to the activities and services of the Authority can be raised.

4. C. Defining outcomes in terms of sustainable economic, social, and environmental benefits

4.1 The governance arrangements the Authority has in place to achieve these principles are to:

- produce a National Park Partnership Plan, reviewed every five years, which contains a vision for Exmoor, key challenges, priorities and targets.
- publish a Corporate Plan and performance report presenting an objective and understandable account of its activities and achievements, its financial position and performance and an assessment of plans to maintain and improve service quality.
- produce a Medium Term Financial Plan which estimates income and expenditure over a five year period to ensure that obligations can be met.
- engage with young people and a wide variety of community groups to ensure that the value of national parks is appreciated into the future.
- ensure that the forward year budget includes a risk assessment.
- assess the impact on community groups before recommendations are made.
- work positively with Natural England and DEFRA to ensure the long term role and funding of national parks is secured.

4.2 In year Commentary

- (i) The Corporate Plan report for 2017/18 was issued to the Authority at the July 2018 meeting and has continued to guide the Authority's activities during the year.
- (ii) The Annual Statement of Accounts for 2017/18 received an unqualified opinion from the Auditor, Grant Thornton LLP in July 2018. Complaints procedures are in place, are easily accessible and are easy to use. Requests for information under the Freedom of Information Act, 2000 are dealt with in accordance with the statutory requirements. Reports on both complaints and Freedom of Information Act requests were submitted to the National Park Authority.
- (iii) Partnership working continues to be a key feature of the Authority's working, the most significant during the past year being the Headwaters of the Exe and Exmoor Mires Projects with South West Water, "Get Involved" Volunteers programme and the "Moor to Enjoy" Health & Wellbeing partnership with funding from both Devon and Somerset County Councils. Clear understandings are agreed with Partners and where the Authority takes the lead role, all matters are conducted in accordance with the Authority's Standing Orders and Financial Regulations.
- (iv) The State of the Park report was produced giving the opportunity to monitor the National Park's special qualities and help identify the issues and trends affecting them.

5. D. Determining the interventions necessary to optimise the achievement of the intended outcomes

5.1 The governance arrangements the Authority has in place to achieve these principles are:

- considering a full range of options before recommendations are presented to members of the Authority.
- undertaking regular surveys of visitors and businesses to ensure that balanced and representative opinions are available to inform decision making.
- producing a Corporate Plan setting out objectives and targets for the period ahead.
- monitoring the achievement of these targets in year, and publicly reporting performance at the year end.
- producing a Medium Term Financial Plan (MTFP) which estimates income and expenditure over a five year period, agreeing annual budgets which implement the Corporate Plan and are informed by the MTFP.
- the Finance and Performance Advisory Panel which will provide scrutiny over the budget setting process.
- when assessing options for capital investment the Authority, considering the life-cycle costs of the asset and the cost of capital financing.

5.2 In year Commentary

- (i) The Authority's decision making processes are based on a slim line structure embracing the principle that there should be no duplication of effort. The Authority is not required to provide executive arrangements which were introduced in the Local Government Act 2000 and apply only to local authorities.
- (ii) The present Authority structure meets all the requirements of the Local Government Act. In March 2015, revised Standing Orders, Powers, Duties and Functions of the Authority Meeting, Scheme of Delegation and Financial Regulations were all approved by Authority and the Members' Code of Conduct and Standing Orders were reviewed and last revised by the Authority in December 2018.
- (iii) The scheme of delegation of functions to Authority Committee and to the Chief Executive works well and is kept under review. In any public authority, decisions are being made all the time and it is important to strike the right balance between those that require Member consideration and those that can be taken by Officers. The scheme of delegation is set out fully in the Authority's standing orders. All decisions by Officers must accord with all Authority policies and must where appropriate involve consultation with Members. Whether a Member or Members should be consulted on any particular issue is a matter of judgement but it is the practice to consult committee chairmen and deputy chairmen on some issues and indeed local Members, that is to say those representing a division, ward or parish. An overriding safeguard in the delegation scheme is that the Chief Executive is required in all cases to consider whether, rather than proceed under the scheme, she should refer the matter to a committee for decision. Where any controversy is likely, it is always the policy to refer such matters to committee for decision.
- (iv) The Finance and Performance Advisory Panel establishes greater budgetary scrutiny and oversight of investment decisions.

6. E. Developing the entity's capacity, including the capability of its leadership and the individuals within it

6.1 The governance arrangements the Authority has in place to achieve these principles are:

- ensuring the Chief Executive is responsible and accountable to the Authority for all aspects of operational management.
- ensuring induction programmes are arranged for new members and new staff.
- ensuring members are provided with the necessary training to perform their roles including member review and member briefing arrangements.
- ensuring that staff are competent to perform their roles and that arrangements are in place for all staff to have a Personal Development Review.
- ensuring mechanisms are in place to maintain the health, safety and wellbeing of staff at work.
- ensuring that the roles and responsibilities of members and staff are documented including those of the statutory officers namely Chief Executive, Chief Finance Officer and Monitoring Officer.
- providing arrangements that are designed to encourage individuals from all sections of the public to engage with, contribute to and participate in the work of the Authority.
- ensuring meetings are held on a regular basis, are open to the public except where reasons of commercial or individual confidentiality require the meeting to be closed.

6.2 In year Commentary

- (i) Induction Programmes were carried out during 2018/19 for new Members and new staff and these have been developed and refined over a number of years. Members identify the subject areas for briefings/updates each year and this has been supplemented by a monthly informal Members' Forum where Members can request an updating or briefing on any topic or area of activity.
- (ii) Members have adopted a job description outlining the role and responsibility of members and an annual Member review is conducted by the Chairman and Deputy Chairman.
- (iii) All members of staff received an annual performance and development review which included ensuring their job description was up to date, reviewed progress against current individual objectives and sets new objectives for the coming year. These objectives are directly linked to those contained in the Corporate Plan.
- (iv) Many organisations are committed to taking a lead role in the achievement of actions in the National Park Partnership Plan and these comprise local authorities, statutory agencies, voluntary organisations and partnerships. All contribute to the periodic updating of progress against the targets.
- (v) The National Park Partnership Plan sets out a long term vision for the National Park and provides a focus on Exmoor's special qualities. The vision of "Working

together for Exmoor" and its wider interpretation is understood and accepted by members and staff.

- (vi) Managers of the Authority have undertaken a leadership and management training programme to increase capability and resilience in this area.

7. F. Managing risks and performance through robust internal control and strong public financial management

7.1 The governance arrangements the Authority has in place to achieve these principles are:

- to produce and agree an annual risk register and risk management policy.
- to maintain an effective risk management system including systems of internal control and internal audit.
- a Health and Safety Committee and focus groups to ensure that accidents and incidents are reported and appropriate management action taken to reduce risk.
- information management, e-mail, internet and ICT policies that are communicated and understood.
- targets for performance in the delivery of services on a sustainable basis.
- ensuring the Chief Finance Officer advises on all financial matters, keeps proper financial records and accounts and maintains an effective system of internal financial control.
- to produce an annual governance statement for inclusion in the Annual Statement of Accounts.
- to operate a Final Accounts Committee and the Finance and Performance Advisory Panel to provide an additional level of oversight and challenge.
- an Internal Audit service to provide reassurance over the operation of internal control and processes.

7.2 in year Commentary

- (i) The Corporate Plan sets out the priorities and objectives for each financial year with periodic reports to those charged with governance on achievements/progress.
- (ii) Annual reports have been made to the National Park Authority on the Risk Management Strategy, the Business Continuity/Disaster Recovery Plan and the Internal Audit Service. The Auditor, Grant Thornton LLP presented their Annual Governance Report to the Committee in July 2018 with an unqualified opinion for the year ended 31 March 2018 and an unqualified conclusion that the Authority had adequate arrangements to secure economy, efficiency and effectiveness in the use of resources.
- (iii) Our Health and Safety practices have been externally appraised and a new Health, Safety & Welfare policy has been drafted.

8. G. Implementing good practices in transparency, reporting, and audit to deliver effective accountability

8.1 The governance arrangements the Authority has in place to achieve these principles are:

- ensuring meetings are held on a regular basis, are open to the public except where reasons of commercial or individual confidentiality require the meeting to be closed.
- arrangements designed to encourage individuals and groups from all sections of the public to engage with, contribute to and participate in the work of the Authority.
- ensuring that all activities are legally correct, fully documented, appropriately authorised and carried out in a planned manner.
- ensuring the Chief Executive is responsible and accountable to the Authority for all aspects of operational management.
- ensuring that the roles and responsibilities of officers are documented including those of the statutory officers namely Chief Executive, Chief Finance Officer and Monitoring Officer.
- publishing an Annual Statement of Accounts each year in accordance with statutory requirements.
- arrangements to enable a complaint or request for information regarding any aspect of the Authority's activities to be easily lodged and to ensure it is properly addressed.
- ensuring the Chief Finance Officer maintains proper records to ensure the annual statement of accounts show a true and fair view and that expenditure has been properly authorised and allocated in an appropriate manner.
- commissioning an Internal Audit service to provide reassurance over the operation of internal control and processes.
- inclusion of an annual governance statement in the Statement of Accounts.
- a Corporate Plan setting out the objectives and targets for the period ahead and annual reports on performance against targets.
- an annual update on the progress of the Authority and its partners on the implementation of the National Park Partnership Plan.
- auditing of the Authority's financial position and performance every year via an External Audit of the final accounts.

8.2 In year Commentary

- (i) Extensive consultation arrangements are in place. The Corporate Plan continues to compare performance against the objectives set for the previous year and sets the targets for the forthcoming year.
- (ii) Annual reports have been made to the National Park Authority on the Risk Management Strategy, the Business Continuity/Disaster Recovery Plan and the Internal Audit Service. The Auditor, Grant Thornton LLP presented their Annual Governance Report to the Committee in July 2018 with an unqualified opinion

for the year ended 31 March 2018 and an unqualified conclusion that the Authority had adequate arrangements to secure economy, efficiency and effectiveness in the use of resources.

- (iii) The Finance and Performance Advisory Panel has been established, terms and reference have been agreed and greater budgetary scrutiny and oversight has been made possible.
- (iv) The Authority now has the capability for the audio and video recording of its meetings and they can be viewed over the internet.

Gordon Bryant
Chief Finance Officer

Simon Clarey
Solicitor & Monitoring Officer



ANNUAL GOVERNANCE STATEMENT

1. **Scope of responsibility**

- 1.1 Exmoor National Park Authority is responsible for ensuring that its business is conducted in accordance with the law and proper standards, and that public money is safeguarded and properly accounted for, and used economically, efficiently and effectively. The Authority also has a duty under the Local Government Act 1999 to make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness.
- 1.2 In discharging this overall responsibility, the Authority is responsible for putting in place proper arrangements for the governance of its affairs, facilitating the effective exercise of its functions, and which includes arrangements for the management of risk.
- 1.3 Exmoor National Park Authority has approved and adopted a code of corporate governance, which is consistent with the principles of the CIPFA/SOLACE Framework *Delivering Good Governance in Local Government*. A copy of the code can be obtained from the Chief Executive, Exmoor House, Dulverton, TA22 9HL. This statement explains how the Authority has complied with the code and also meets the requirements of regulations 4(3) of the Accounts and Audit (England) Regulations 2011 in relation to the publication of an annual governance statement.

2. **The purpose of the governance framework**

- 2.1 The governance framework comprises the systems and processes, and the culture and values, by which the Authority is directed and controlled and its activities through which it accounts to, engages with and the leads the community. It enables the Authority to monitor the achievement of its strategic objectives and to consider whether those objectives have led to the delivery of appropriate, cost-effective services.
- 2.2 The system of internal control is a significant part of that framework and is designed to manage risk to a reasonable level. It cannot eliminate all risk of failure to achieve policies, aims and objectives and can therefore only provide reasonable and not absolute assurance of effectiveness. The system of internal control is based on an ongoing process designed to identify and prioritise the risks to the achievement of the Authority's policies and aims and objectives, to evaluate the likelihood of those risks being realised and the impact should they be realised, and to manage them efficiently, effectively and economically.
- 2.3 A governance framework has been in place at Exmoor National Park Authority for the year ended 31 March 2018 and up to the date of approval of the Corporate Plan and statement of accounts.

3. **The Governance Framework**

3.1 The key elements of the governance framework include:

- A National Park Partnership Plan that contains a vision, priorities and a corporate strategy to meet National Park purposes;
- An annual review of the Authority's priorities as contained in the National Park Partnership Plan;
- The production of a Medium Term Financial Plan taking account of the anticipated level of National Park Grant;
- The production of a Corporate Plan that includes data on performance and objectives both achieved and planned;
- Committee papers that are linked to National Park Partnership Plan or Corporate Plan objectives and in compliance with equality and human rights legislation;
- Standing orders and financial regulations to regulate the conduct of the Authority's affairs;
- A Scheme of Delegation which sets out the functions and workings of the Authority and the powers delegated to Committees and the Chief Executive;
- Formal codes of conduct which define the standards of personal behaviour of members and staff. The code for Members was initially adopted in 2012 along with the establishment of a Standards Committee comprising 5 Authority members and the appointment of an "Independent Person" under the provisions of the 2011 Localism Act. A further process was the provision of guidance on the registration of interests. This was reviewed and refined in August 2012 with recommendations to Authority for standards arrangements and for the provision of member training on the new standards regime;
- Responsibility for audit matters are retained by the Authority;
- A Solicitor and Monitoring Officer who has a statutory responsibility supported by the Chief Finance Officer and financial regulations to ensure the legality of transactions, activities and arrangements the Authority enters;
- Financial management arrangements of the Authority which conform with the governance requirements of the CIPFA Statement on the role of the Chief Financial Officer in Local Government (2010) ;
- A Complaints procedure and a whistle-blowing policy in place for members of the public, members, staff or contractors;
- An Anti Fraud, Corruption and Bribery Policy;
- An ICT Acceptable Use Policy;
- Risk Management Policy, Registers and Business Continuity and Disaster Recovery systems which are approved, in place and subject to annual regular review;

- Extensive arrangements for partnership working on a range of projects. Partnership working is crucial to the achievement of the priorities set out in the National Park Partnership Plan.
- A staff performance and development review process which identifies training and development needs;
- Training, briefing and induction programmes for members; and
- Wide consultation with interested parties and an Exmoor Consultative and Parish Forum meets to engage with the community and a Local Access Forum considers access and rights of way issues. Numerous diverse organisations are represented on these consultative mechanisms.

4 Review of Effectiveness

4.1 Exmoor National Park Authority has responsibility for conducting at least annually, a review of effectiveness of its governance framework including the system of internal control. The review of effectiveness is informed by the work of the Chief Executive and Heads of Section within the Authority who have responsibility for the development and maintenance of the governance environment, the annual report on internal audit, and by the Annual Governance Report of the external auditors.

4.2 The process that has been applied in maintaining and reviewing the effectiveness of the governance framework is:

- The adoption of an updated Code of Corporate Governance in March 2017 with an annual review by the National Park Authority carried out by the Authority's Solicitor and Monitoring Officer to ensure compliance with the Code and audited by the Chief Finance Officer;
- Adoption of Standing Orders, the scheme of delegation and financial regulations which are periodically reviewed, updated and approved;
- Reports to the Authority on performance management including sustainability and the corporate planning and performance framework;
- Annual reports presented to the Authority in respect of internal audit which is a contracted service, and from the external auditor appointed by the Audit Commission;
- Annual reports presented to the Authority on risk management, performance indicators and treasury management; and
- An internal audit service is contracted from the Devon Audit Partnership and an annual work programme is agreed with the Chief Finance Officer with the internal auditors producing an annual report covering their activities for presentation to the Authority.

5. Significant governance issues

5.1 In general the governance and internal control systems within the Authority are working effectively and have been reviewed by the Solicitor and Monitoring Officer and the Chief Finance Officer and are independently validated by the internal and external auditors.

5.2 During 2019/20 the Authority will be:

- Continuing the communication and implementation of the 2018-23 National Park Partnership Plan;
- Producing guidance on the recently adopted Local Plan;
- Working with Defra to deliver the eight points of the recently developed National Parks Plan;
- Monitoring new legislation and changes in policy to ensure that account is taken of the impact on National Parks and National Park communities;
- Responding to the Glover review;
- Continuing to operate within limited resources while increasing revenue from alternative sources;
- Develop options to ensure the continued management of resources in a new funding era;
- Implement the results of the job evaluation review;
- Undertake a review of procurement policies and practices;
- Continuing to develop customer service standards and culture; and
- Monitoring the performance of the Corporate Plan.

5.3 We propose over the coming year to take steps to address the above matters to further enhance our governance arrangements. We are satisfied that these steps will address the need for improvements that were identified in our review of effectiveness and will monitor their implementation and operation as part of our annual review.

Signed

Mrs S Bryan, Chief Executive

R Milton, Chairman

Date

EXMOOR NATIONAL PARK AUTHORITY

2 April 2019

EXTERNAL AUDIT PLAN FOR THE YEAR ENDING 31 MARCH 2019

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.

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 (England) Regulations 2011, Part 2 (Financial Management and Internal Control)

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 2018/19 budget to cover the costs of both external and internal audit.

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 Geraldine Daly, Associate Director at Grant Thornton UK LLP, Julie Masci, Engagement Lead and Anopa Gumbie, Audit Manager are responsible for undertaking the relevant work. They are not able to attend today's meeting but their report is attached at Appendix 1.

Gordon Bryant
Chief Finance Officer
March 2019



External Audit Plan

Year ending 31 March 2019

Exmoor National Park Authority

18 March 2019



Contents



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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.

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Introduction & headlines

Purpose

This document provides an overview of the planned scope and timing of the statutory audit of Exmoor National Park Authority ('the 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 (PSAA), the body responsible for appointing us as auditor of Exmoor National Park Authority. We draw your attention to both of these documents on the [PSAA website](#).

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
- Value for Money arrangements in place at the Authority for securing economy, efficiency and effectiveness in your use of resources.

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 business and is risk based. We will be using our new audit methodology, LEAP, for the 2018/19 audit. It will enable us to be more responsive to changes that may occur in your organisation.

Significant risks

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

- Valuation of the pension fund liability
- Valuation of property, planet and equipment
- Management override of controls

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 planning materiality to be £104,000 (PY £100,000), which equates to 2% of your gross expenditure for the prior year. 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 £5,200 (PY £5,000).

Value for Money arrangements

Our risk assessment regarding your arrangements to secure value for money has not identified any VfM significant risks.

Audit logistics

Our interim visit will take place in February and our final visit will take place in June. Our key deliverables are this Audit Plan and our Audit Findings Report.

Our fee for the audit will be no less than £9,004 (PY: £11,693) for the Authority.

Independence

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.

Key matters impacting our audit

Factors

The wider economy and political uncertainty

Local Government funding continues to be stretched with increasing cost pressures and demand from residents. For Exmoor National Park Authority, the its grant levels have increased since 2016/17 due to the 4 year funding period that ends in 2019/20. The National Park Grant for 2018/19 is £3,157k . Core expenditure is forecast to be £4.9m in 2018/19. In real terms, a 2% pa increase against the inflationary environment is an anticipation that costs will remain stagnant which is consistent with other bodies in the sector as all players continue their efforts to control their costs

Going forward there is a degree of uncertainty around the National Park Grant funding since the current settlement period ends after the 2019/20 financial year.

At a national level, the government continues its negotiation with the EU over Brexit, and future arrangements remain clouded in uncertainty. The Authority will need to ensure that it is prepared for all outcomes, including in terms of any impact of contracts, on service delivery and on its support for local people and businesses.

Changes to the CIPFA 2018/19 Accounting Code

The most significant changes relate to the adoption of:

- IFRS 9 Financial Instruments which impacts on the classification and measurement of financial assets and introduces a new impairment model.
- IFRS 15 Revenue from Contracts with Customers which introduces a five step approach to revenue recognition.

Our response

- We will consider your arrangements for managing and reporting your financial resources as part of our work in reaching our Value for Money conclusion.
- We will consider whether your financial position leads to material uncertainty about the going concern of the Authority and will review related disclosures in the financial statements.
- We will keep you informed of changes to the financial reporting requirements for 2018/19 through on-going discussions and invitations to our technical update workshops.
- As part of our opinion on your financial statements, we will consider whether your financial statements reflect the financial reporting changes in the 2018/19 CIPFA Code.

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 & conclusions
The revenue cycle includes fraudulent transactions	<p>Under ISA (UK) 240 there is a rebuttable presumed risk that revenue may be misstated due to the improper recognition of revenue.</p> <p>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 due to the predictability of a majority of the revenue; and• The culture and ethical frameworks of local authorities, including Exmoor National Park Authority, mean that all forms of fraud are seen as unacceptable <p>Therefore we do not consider this to be a significant risk for Exmoor National Park Authority.</p>
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. .</p> <p>Management over-ride of controls is a risk requiring special audit consideration.</p>	<p>We will:</p> <ul style="list-style-type: none">• gain an understanding of the accounting estimates, judgements applied and decisions made by management and consider their reasonableness• obtain a full listing of journal entries, identify and test unusual journal entries for appropriateness• evaluate the rationale for any changes in accounting policies or significant unusual transactions.

Significant risks identified

Risk	Reason for risk identification	Key aspects of our proposed response to the risk
Valuation of property, plant and equipment	<p>The Authority revalues its land and buildings on an annual basis to ensure that carrying value is not materially different from fair value. This represents a significant estimate by management in the financial statements.</p> <p>We identified the valuation of land and buildings revaluations as a risk requiring special audit consideration.</p>	<p>We will:</p> <ul style="list-style-type: none"> • Review of management's processes and assumptions for the calculation of the valuation. • Review of the competence, expertise and objectivity of any management experts used. • Test the completeness and accuracy of information provided to the valuation expert • Determine whether the valuation report adequately documents the work performed by the valuation expert, including conclusions reached • Testing of revaluations made during the year to ensure they are input correctly into the Authority's asset register • Evaluation of the assumptions made by management for any assets not revalued during the year and how management has satisfied themselves that these are not materially different to current value.
Valuation of pension fund net liability	<p>The Authority's pension fund asset and liability as reflected in its balance sheet represent a significant estimate in the financial statements.</p> <p>We identified the valuation of the pension fund net liability as a risk requiring special audit consideration.</p>	<p>We will:</p> <ul style="list-style-type: none"> • Identify the controls put in place by management to ensure that the pension fund liability is not materially misstated. We will also assess whether these controls were implemented as expected and whether they are sufficient to mitigate the risk of material misstatement. • Confirm validity of the source data provided to the actuary by agreeing to the Authority payroll and/ or accounting records. • Evaluate the competence, expertise and objectivity of the actuary who carried out your pension fund valuation. We will gain an understanding of the basis on which the valuation is carried out. • Undertake procedures to confirm the reasonableness of the actuarial assumptions made. • Agree the pension fund asset and liability and disclosures in notes to the financial statements with the actuarial report from your actuary.

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 Report in July 2019.

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 to check that they are consistent with the financial statements on which we give an opinion and consistent with our knowledge of the Authority.
- We carry out work to satisfy ourselves that disclosures made in your Annual Governance Statement are in line with the guidance issued by CIPFA.
- We carry out work on your consolidation schedules for the Whole of Government Accounts process in accordance with NAO group audit instructions, as required.
- We consider our other duties under legislation and the Code, as and when required, including:
 - Giving electors the opportunity to raise questions about your 2018/19 financial statements, consider and decide upon any objections received in relation to the 2018/19 financial statements;
 - issue of a report in the public interest or written recommendations to the Authority under section 24 of the Act, copied to the Secretary of State.
 - Application to the court for a declaration that an item of account is contrary to law under Section 28 or for a judicial review under Section 31 of the Act; or
 - 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 risks identified in this report.

Going concern

As auditors, we are required to "obtain sufficient appropriate audit evidence about the appropriateness of management's use of the going concern assumption in the preparation and presentation of the financial statements and to conclude whether there is a material uncertainty about the Authority's ability to continue as a going concern" (ISA (UK) 570). We will review management's assessment of the going concern assumption and evaluate the disclosures in the financial statements.

PSAA Contract Monitoring

Exmoor National Park Authority opted into the Public Sector Audit Appointments (PSAA) Appointing Person scheme which starts in 2018/19. PSAA appointed Grant Thornton as auditors. PSAA is responsible under the Local Audit (Appointing Person) Regulations 2015 for monitoring compliance with the contract and is committed to ensuring good quality audit services are provided by its suppliers. Details of PSAA's audit quality monitoring arrangements are available from its website, www.psa.co.uk.

Our contract with PSAA contains a method statement which sets out the firm's commitment to deliver quality audit services, our audit approach and what clients can expect from us. We have set out commitment as set out in appendix B to deliver a high quality audit service in the attached presentation. We hope this is helpful. It will also be a benchmark for you to provide feedback on our performance to PSAA via its survey in Autumn 2019.

Materiality

The concept of 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. Misstatements, including omissions, are considered to be material if they, individually or in the aggregate, could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements.

Materiality for planning purposes

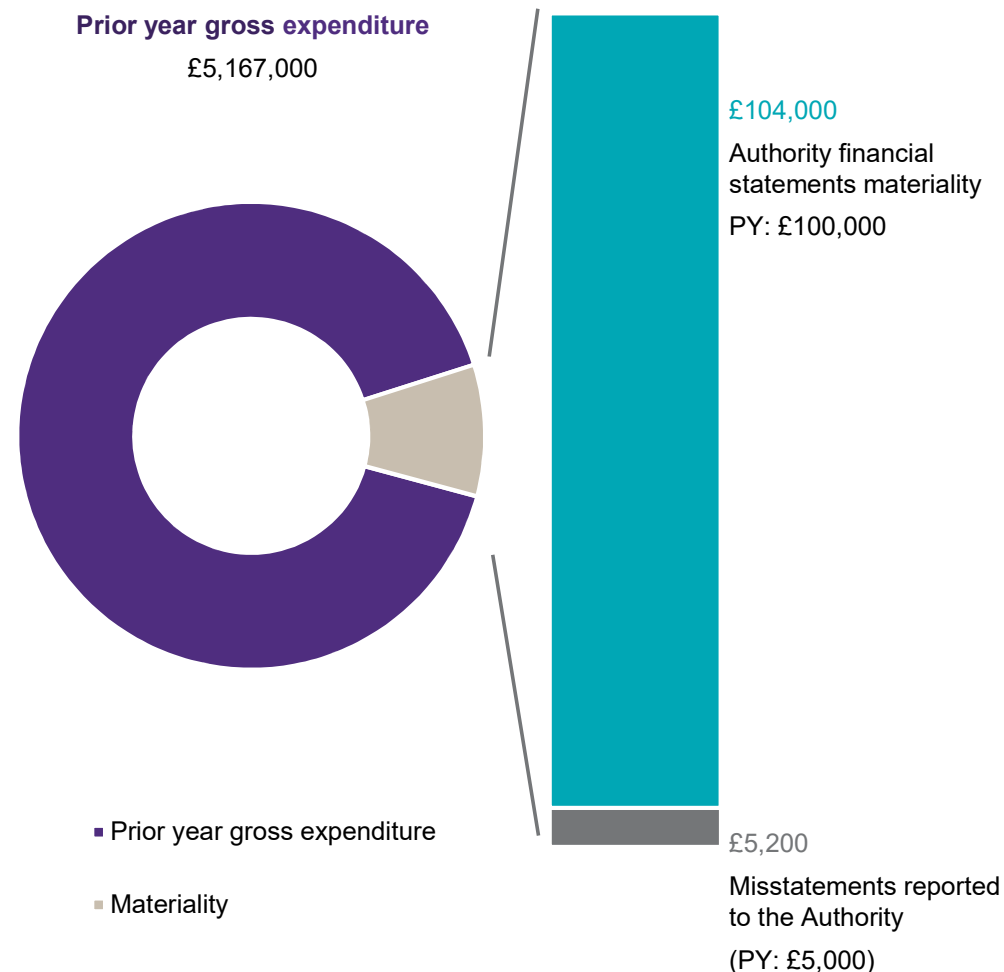
We have determined financial statement materiality based on a proportion of the gross expenditure of the Authority for the financial year. In the prior year we used the same benchmark. Materiality at the planning stage of our audit is £104,000 (PY £100,000) for the Authority, which equates to 2% of your prior year gross expenditure for the year. We design our procedures to detect errors in specific accounts at a lower level of precision which we have determined to be £10,000 for Senior officer remuneration.

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.

Matters we will report to the Authority

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. 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. 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 £5,200 (PY £5,000).

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.



Value for Money arrangements

Background to our VFM approach

The NAO issued its guidance for auditors on Value for Money work in November 2017. The guidance states that for Local Government bodies, auditors are required to give a conclusion on whether the Authority has proper arrangements in place to secure value for money.

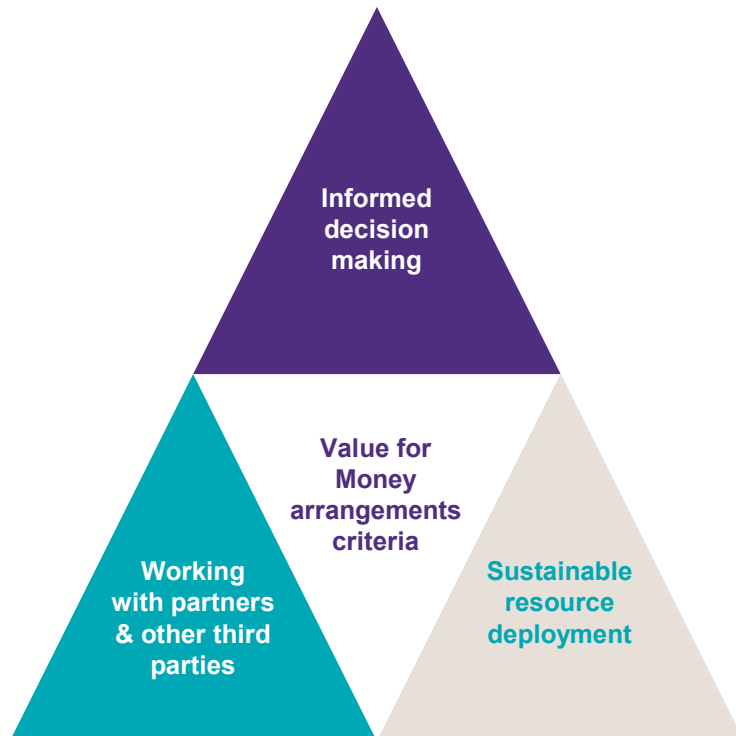
The guidance identifies one single criterion for auditors to evaluate:

“In all significant respects, the audited body takes properly informed decisions and deploys resources to achieve planned and sustainable outcomes for taxpayers and local people.”

This is supported by three sub-criteria, as set out below:

Significant VFM risks

We have not identified any significant risks from our initial risk assessment. We will continue our review of your arrangements, including reviewing your Annual Governance Statement, before we issue our auditor's report.



Audit logistics, team & fees



Julie Masci, Engagement Lead

Responsible for overall quality control; accounts opinions; final authorisation of reports; attendance at Final Accounts Committee.



Anopa Gumbie, Audit Manager

Responsible for the overall management of the audit; consideration of VFM work; quality assurance of audit work and outputs.



Steph Thayer, Audit Incharge

Responsible for management of audit fieldwork, including accounts, coordination of work completed by audit assistants, coordination of work of specialists and advisors where delegated by the Manager.

Audit fees

The planned audit fees are £9,004 (PY: £11,696) for the financial statements audit completed under the Code, which are inline with the scale fee published by PSAA. In setting your fee, we have assumed that the scope of the audit, and the Authority and its activities, do not significantly change.

Our requirements

To ensure the audit is delivered on time and to avoid any additional fees, we have detailed our expectations and requirements in the following section 'Early Close'. If the requirements detailed overleaf are not met, we reserve the right to postpone our audit visit and charge fees to reimburse us for any additional costs incurred.

Early close

Meeting the 31 July audit timeframe

In the prior year, the statutory date for publication of audited local government accounts was brought forward to 31 July, across the whole sector. This was a significant challenge for local authorities and auditors alike. For authorities, the time available to prepare the accounts was curtailed, while, as auditors we had a shorter period to complete our work and faced an even more significant peak in our workload than previously.

We have carefully planned how we can make the best use of the resources available to us during the final accounts period. As well as increasing the overall level of resources available to deliver audits, we have focused on:

- starting work on final accounts audits as early as possible, by agreeing which authorities will have accounts prepared significantly before the end of May
- seeking further efficiencies in the way we carry out our audits
- working with you to agree detailed plans to make the audits run smoothly, including early agreement of audit dates, working paper and data requirements and early discussions on potentially contentious items.

We are satisfied that, if all these plans are implemented, we will be able to complete your audit and those of our other local government clients in sufficient time to meet the earlier deadline.

Client responsibilities

Where individual clients 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 clients. We will therefore conduct audits in line with the timetable set out in audit plans (as detailed on page 10). Where the elapsed time to complete an audit exceeds that agreed due to a client 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 a client not meeting their obligations we are not able to guarantee the delivery of the audit by the statutory deadline. Such audits are unlikely to be re-started until very close to, or after the statutory deadline. In addition, it is highly likely that these audits will incur additional audit fees.

Our requirements

To minimise the risk of a delayed audit or additional audit fees being incurred, you need to ensure that you:

- produce draft financial statements of good quality by the deadline you have agreed with us, including all notes, the narrative report 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
- ensure that all appropriate staff are available on site throughout (or as otherwise agreed) the planned period of the audit
- respond promptly and adequately to audit queries.

In return, we will ensure that:

- the audit runs smoothly with the minimum disruption to your staff
- you are kept informed of progress through the use of an issues tracker and weekly meetings during the audit
- we are available to discuss issues with you prior to and during your preparation of the financial statements.

Independence & 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.

We confirm that we have implemented policies and procedures to meet the requirements of 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 December 2017 and PSAA's Terms of Appointment which set out supplementary guidance on ethical requirements for auditors of local public bodies.

Other services provided by Grant Thornton

For the purposes of our audit we have made enquiries of all Grant Thornton UK LLP teams providing services to the Authority. No other services were identified

Appendices

A. Audit Approach

B. Our commitment to you

Audit approach

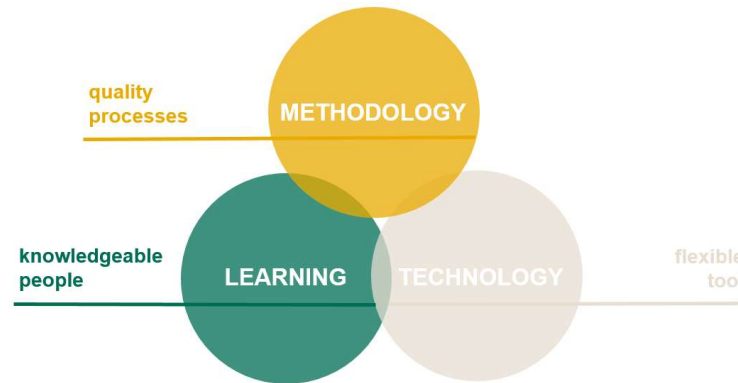
Use of audit, data interrogation and analytics software

LEAP



Audit software

- A globally developed ISA-aligned methodology and software tool that aims to re-engineer our audit approach to fundamentally improve quality and efficiency
- LEAP empowers our engagement teams to deliver even higher quality audits, enables our teams to perform cost effective audits which are scalable to any client, enhances the work experience for our people and develops further insights into our clients' businesses
- A cloud-based industry-leading audit tool developed in partnership with Microsoft



IDEA



- We use one of the world's leading data interrogation software tools, called 'IDEA' which integrates the latest data analytics techniques into our audit approach
- We have used IDEA since its inception in the 1980's and we were part of the original development team. We still have heavy involvement in both its development and delivery which is further enforced through our chairmanship of the UK IDEA User Group
- In addition to IDEA, we also use other tools like ACL and Microsoft SQL server
- Analysing large volumes of data very quickly and easily enables us to identify exceptions which potentially highlight business controls that are not operating effectively

Appian



Business process management

- Clear timeline for account review:
 - disclosure dealing
 - analytical review
- Simple version control
- Allow content team to identify potential risk areas for auditors to focus on

Info



Cloud based software which uses data analytics to identify trends and high risk transactions, generating insights to focus audit work and share with clients.



REQUEST & SHARE

- Communicate & transfer documents securely
- Extract data directly from client systems
- Work flow assignment & progress monitoring



ASSESS & SCOPE

- Compare balances & visualise trends
- Understand trends and perform more granular risk assessment



VERIFY & REVIEW

- Automate sampling requests
- Download automated work papers



INTERROGATE & EVALUATE

- Analyse 100% of transactions quickly & easily
- Identify high risk transactions for investigation & testing
- Provide client reports & relevant benchmarking KPIs



FOCUS & ASSURE

- Visualise relationships impacting core business cycles
- Analyse 100% of transactions to focus audit on unusual items
- Combine business process analytics with related testing to provide greater audit and process assurance



INSIGHTS

- Detailed visualisations to add value to meetings and reports
- Demonstrates own performance and benchmark comparisons

Our commitment to our local government clients

- Senior level investment
- Local presence enhancing our responsiveness, agility and flexibility.
- High quality audit delivery
- Collaborative working across the public sector
- Wider connections across the public sector economy, including with health and other local government bodies
- Investment in Health and Wellbeing, Social Value and the Vibrant Economy
- Sharing of best practice and our thought leadership.
- Invitations to training events locally and regionally – bespoke training for emerging issues
- Further investment in data analytics and informatics to keep our knowledge of the areas up to date and to assist in designing a fully tailored audit approach

Local Government audits 2018/19 and beyond Grant Thornton's External Audit commitment

Our relationship with our clients– why are we best placed?

- We work closely with our clients to ensure that we understand their financial challenges, performance and future strategy.
- We deliver robust, pragmatic and timely financial statements and Value for Money audits
- We have an open, two way dialogue with clients that support improvements in arrangements and the audit process
- Feedback meetings tell us that our clients are pleased with the service we deliver. We are not complacent and will continue to improve further
- Our locally based, experienced teams have a commitment to both our clients and the wider public sector
- We are a Firm that specialises in Local Government, Health and Social Care, and Cross Sector working, with over 25 Key Audit Partners, the most public sector specialist Engagement Leads of any firm
- We have strong relationships with CIPFA, SOLACE, the Society of Treasurers, the Association of Directors of Adult Social Care and others.
- We propose a realistic fee, based on known local circumstances and requirements.

New opportunities and challenges for your community

The Local Government economy

Local authorities face unprecedented challenges including:

- Financial Sustainability – addressing funding gaps and balancing needs against resources
- Service Sustainability – funding gaps and pressure on services
- Transformation – new models of delivery, greater emphasis on partnerships, more focus on economic development
- Technology – cyber security and risk management

At a wider level, the political environment remains complex:

- The government continues its negotiation with the EU over Brexit, and future arrangements remain uncertain.
- We will consider your arrangements for managing and reporting your financial resources as part of our work in reaching our Value for Money conclusion.
- We will keep you informed of changes to the financial reporting requirements for 2018/19 through on-going discussions and invitations to our technical update workshops.

Delivering real value through:

- Early advice on technical accounting issues, providing certainty of accounting treatments, future financial planning implications and resulting in draft statements that are 'right first time'
- Knowledge and expertise in all matters local government, including local objections and challenge, where we have an unrivalled depth of expertise.
- Early engagement on issues, especially on ADMs, restructuring, partnership working, inter authority agreements, governance and financial reporting
- Implementation of our recommendations have resulted in demonstrable improvements in your underlying arrangements, for example financial management, reporting and governance.
- Robust but pragmatic challenge – seeking early liaison on issues, and having the difficult conversations early to ensure a 'no surprises' approach – always doing the right thing
- Providing regional training and networking opportunities for your teams on technical accounting issues and developments and changes to Annual Reporting requirements
- An efficient audit approach, providing tangible benefits, such as releasing finance staff earlier and prompt resolution of issues.

Grant Thornton in Local Government

Our client base and delivery



- We are the largest supplier of external audit services to local government
- We audit over 150 local government clients
- We signed 95% of our local government opinions in 2017/18 by 31 July
- In our latest independent client service review, we consistently score 9/10 or above. Clients value our strong interaction, our local knowledge and wealth of expertise.

Our connections



- We are well connected to MHCLG, the NAO and key local government networks
- We work with CIPFA, Think Tanks and legal firms to develop workshops and good practice
- We have a strong presence across all parts of local government including blue light services
- We provide thought leadership, seminars and training to support our clients and to provide solutions

Our people



- We have over 25 engagement leads accredited by ICAEW, and over 250 public sector specialists
- We provide technical and personal development training
- We employ over 80 Public Sector trainee accountants

Our quality



- Our audit approach complies with the NAO's Code of Audit Practice, and International Standards on Auditing
- We are fully compliant with ethical standards
- Your audit team has passed all quality inspections including QAD and AQRT

Our technical support



- We have specialist leads for Public Sector Audit quality and technical
- We provide national technical guidance on emerging auditing, financial reporting and ethical areas
- Specialist audit software is used to deliver maximum efficiencies

"I have found Grant Thornton to be very impressive.....they bring a real understanding of the area. Their insights and support are excellent. They are responsive, pragmatic and, through their relationship and the quality of their work, support us in moving forward through increasingly challenging times. I wouldn't hesitate to work with them."

Director of Finance, County Council



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