

Representation Statement

Regulation 12

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

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1. Introduction

- 1.1 Exmoor National Park Authority is required to prepare a Representation Statement to accompany the Rural Worker and Succession Farm Worker Dwellings Supplementary Planning Document (SPD), in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 [regulation 12]. It has since been updated to include details of the representation statement consultation.

2. Purpose of the Document

- 2.1 This statement explains how the consultation has been carried out at key stages in the preparation of the Rural Worker and Succession Farm Worker Dwellings SPD and addresses the following requirements:
- Illustrates the organisations and individuals who were invited to make representations,
 - Shows how they were invited to make representations,
 - Summarises the main issues raised as a result of the consultation, and
 - Shows how those main issues have been addressed in the Rural Worker and Succession Farm Worker Dwellings SPD.

Compliance with the Statement of Community Involvement (SCI)

- 2.2 The Authority's first SCI was adopted in August 2006; setting out the minimum requirements the Authority must carry out when consulting at each stage of the preparation of the Local Plan and on any other planning matters which includes the production of Supplementary Planning Documents (SPDs). A revised version of the SCI was prepared as a result of changes to the legislative framework for the planning system including the introduction of neighbourhood planning through the Localism Act 2011 and the publication of the National Planning Policy Framework. The SCI was adopted by the Authority on 3rd November 2015.
- 2.3 The Overarching Aims for Community Involvement in the Planning of Exmoor are as follows:
- Exmoor National Park Authority aims to ensure that all those with an interest in the National Park have the opportunity to submit their views in relation to planning matters, and that consultations are structured to facilitate active involvement and are tailored to the type of planning document involved subject to the constraints of the planning system, resources, and deadlines.
- 2.4 The Exmoor National Park Consultation Database maintains a record of all consultees and respondents. This data is maintained in compliance with the General Data Protection Regulation (EU) 2016/679 (GDPR) and Data Protection Act 2018. Some people request their information to be included on the database, whilst other specific and

general consultation bodies are directly contacted as a requirement of the Town and Country Planning (Local Plan) (England) Regulations 2012. All those who have expressed an interest in being consulted on planning matters were notified during the formal consultation process. In addition, in accordance with the requirements of the SCI, the Authority consulted on its draft SPD with statutory bodies, Parish and Town Councils, local interest groups and also local businesses.

2.5 In accordance with the SCI requirements, the Authority ensured that the SPD was formally made available for inspection at the National Park Authority offices at Exmoor House, and sent copies to Somerset West and Taunton and North Devon Councils so they could make them available, during the formal consultation process. In addition, copies were made available in local libraries and information points, press releases were sent out, and the consultation was publicised on the website.

3. Rural Worker and Succession Farm Workers Dwellings SPD – Engagement and Consultation

3.1 Table 3.1 sets out the consultation and engagement strategies employed by the Authority throughout the preparation of the Rural Worker and Succession Farm Worker Dwellings SPD; consistent with the adopted SCI.

TABLE 3.1 SPD ENGAGEMENT AND CONSULTATION

STAGE	DETAILS
INFORMAL CONSULTATION July 2018	Two workshops were held: - one with Exmoor Hill Farm Network on 2 July 2018 and one with Planning Agents on 19 July 2018. Invites were sent out by email. The key questions posed were: <ol style="list-style-type: none"> 1) What is helpful about the Guidance Note? 2) Is there anything that is unclear or unhelpful? 3) Do you have any suggestions as to how we could improve the Guidance Note? 6 representatives attended the Hill Farm Network meeting, and 3 Agents attended the Planning Agents informal consultation.
SEA SCREENING PROCESS CONSULTATION 13 March – 12 April 2019	The Statutory Consultees were consulted on the SEA screening process. An email was sent out 13 March 2019 to the Environment Agency, Natural England and Historic England giving notification of the consultation. Responses were received from the Environment Agency and Natural England. No response was received from Historic England.

STAGE	DETAILS
<p>FORMAL CONSULTATION 7 May – 31 July 2019</p>	<p>The formal consultation was originally planned for 7 May – 18 June. However, due to requests from Parish Councils for extension, the date was extended to 31 July to allow sufficient time for Parish Councils to respond.</p> <p><u>Publicity:</u> Press releases sent out publicising consultation to local press and Farming UK.</p> <p><u>Website:</u> Copies of consultation put online.</p> <p><u>Deposit points:</u> Copies of the consultation document were made available at statutory deposit points (ENPA offices, District Council offices, NP Centres) and local libraries.</p> <p>Notification of the statutory & general consultation bodies, & those on the consultation register.</p> <p>A Quick Guide and Q & A sheet was also produced, put on the website and circulated to consultees via email.</p> <p>19 responses were received, 16 with representations. More details on those consulted are set out in Appendix 3.</p>
<p>REGULATION 12 REPRESENTATION STATEMENT CONSULTATION 23 October 2019 – 13 January 2020</p>	<p>The formal consultation was originally planned for 23 October to – 20 November. However, due to a Parish Councils request for extension, the date was extended to 13 January.</p> <p>Notification of the statutory & general consultation bodies, & those on the consultation register.</p> <p><u>Website:</u> Copies of consultation put online.</p> <p><u>Deposit points:</u> Copies of the consultation document were made available at ENPA offices.</p> <p>6 responses were received. Of these, 2 contained a comment that came within the consultation parameters. 2 representations were acknowledging the invitation to make representations but to confirm that no comments were being submitted.</p>

SEA PROCESS

3.2 The Exmoor National Park Authority was required to determine whether or not the contents of the draft SPD required a Strategic Environmental Assessment (SEA). An SEA is required under European legislation for all plans which may have a significant effect on the environment.¹ The findings of the Screening Report concluded that the Draft SPD for Rural Worker and Succession Farm Worker Dwellings was unlikely to have a significant effect on the environment. The three Statutory Consultees were consulted – Historic England, Natural England and the Environment Agency. Responses were received with no objections, from Natural England and the Environment Agency. Historic England chose not to respond.

¹ European Directive 2001/42/EC1

INFORMAL CONSULTATION SUMMER 2018:

A SUMMARY OF THE MAIN ISSUES RAISED

3.3 The following tables set out the main issues raised by representations received at the meeting with the Hill Farm Network on 2 July 2018, and with Agents at the meeting on 19 July 2018.

Hill Farm Network comments	Response
Flow diagrams and tables recommended to illustrate process and simplify document	Inserted.
Stressed the importance of rural workers and succession farm worker dwellings remaining affordable for other rural workers in the long term.	Already in document, but wording amended to clarify and stress importance of the need for such a dwelling to remain affordable to other rural land based workers.
The flexibility provided in the Guidance for the size of a rural worker dwelling was welcomed.	Noted.

Agents comments	Response
The structure of the Guidance should follow the process of an application.	Structure amended accordingly.
Agents queried the use of the Agricultural Budgeting and Costing Book.	Query was discussed with Authority Advisors and wording amended accordingly.
Further detail required on what required and when in terms of business accounts, period of accounts	SPD amended to provide further clarification.
The flexibility provided in the Guidance for the size of a rural worker dwelling was welcomed.	Noted.

CONSULTATION SUMMER 2019:

A SUMMARY OF THE MAIN ISSUES RAISED

3.2 The following tables set out the main issues raised by representations received during the formal consultation on 7 May – 31 July 2019.

Comments relating to the whole SPD

Main Issues Raised	Response
A well put together document, offering flexibility.	Noted.
Document long and complex	A Quick Guide is available to applicants along with a Q & A Summary.
The policies providing for rural worker and succession farm worker dwellings, need to be widened out to other rural businesses	The policies are in accordance with paragraph 79 of the National Planning Policy Framework, and therefore do not provide for other rural businesses

1. Introduction

Policy / Plan Reference	Main Issues Raised	Response
Definition of a Rural Worker on page 4 of the Introduction.	A number of concerns raised with regard to the definition of a rural worker. Comments ranged from the definition not including a shepherd or herdsman, to not providing for the modern day farmer.	The definition of a rural worker is set out in policy HC-D9, and for a succession farm worker in policy HC-D10 of the adopted Local Plan and therefore cannot be changed at this stage.

2. Functional and Financial Tests

Policy / Plan Reference	Main Issues Raised	Response
<p>Paragraphs 2.1 & 2.15</p>	<p>A number of consultees raised concerns with regard to the term 'traditional land management' providing that it did not take account of modern farming practices.</p>	<p>It is acknowledged that the meaning of 'traditional methods and practices' can be misleading and unclear. The document has therefore been amended to focus on what the National Park Authority wants from the outcome of farming on Exmoor and provides that: the enterprise will contribute to the conservation or enhancement of the National Park in accordance with policies GP1 and CE-S1 (Landscape and Seascape Character) of the Local Plan, and provide for green infrastructure that incorporates measures to enhance biodiversity in accordance with policy CE-S3 Biodiversity and Green Infrastructure.</p>
<p>Paragraphs 2.9 & 2.17</p>	<p>The draft SPD provides that proposals should demonstrate that the occupation of the existing farmhouse by the current occupants is still essential and that they are available and present on site for the needs of the holding before it can be accepted that there is a need for an additional rural worker dwelling on the site.</p> <p>A representation has been made to say that the correct test would be to examine whether any existing dwelling is suitable and whether it can reasonably be held to be available to meet the needs of a holding for an agricultural worker to live on site.</p>	<p>In order to be flexible and provide discretion in decision making, the paragraphs have been amended to provide for what is 'reasonable' on a case by case basis.</p>

Policy / Plan Reference	Main Issues Raised	Response
Paragraph 2.9	Concerns were raised with regard to the unintended effect of occupancy conditions which are placed on rural dwellings and any existing dwelling(s) on the farm, upon the granting of planning permission for a new rural worker dwelling. Of particular concern, was the potential devaluation of a farm business and potential prevention from borrowing.	No proposed amendments: the SPD is consistent with wording in policy HC-D8 (3).
Page 12 Full Time Rural Worker Methodology	Concerns were raised with regard to how many hours should be worked and what methodology should be used.	Further advice was sought from our advisors to the Authority in such matters and the methodology has been amended to incorporate the use of an additional two methods: The John Nix Farm Management Pocket Book, and the Equine Business Guide. It has also been noted that prior agreement should be sought from the Authority if site specific anomalies need to be accounted for.

3. Size Requirements for A Rural Worker or Succession Farm Dwelling

Policy / Plan Reference	Main Issues Raised	Response
General	Comments were with regard to the size limit for a rural worker or succession farm worker dwelling, providing that the size of a dwelling should be larger for a farm house, where additional space is required for the farm business, and that the space should be equivalent to the functional needs of the farm	Since the Local Plan adoption further evidence work has been undertaken to assess the sizes of additional business space that farmers have been requiring in their planning applications, and this has provided a figure of between an additional 10 to 20 m ² . The additional habitable space which allows for a range of between 106-115sqm, is based on

Policy / Plan Reference	Main Issues Raised	Response
	<p>business. However, other comments were received applauding the additional allowance for space in both the informal and formal consultation.</p>	<p>nationally described space standards, and is therefore consistent with the Local Plan which provides for 93 m² for a dwelling - the minimum space standard for a three-bedroom, two-storey, 5 person dwelling. If both additional business and habitable space is demonstrated as a requirement for a larger dwelling and this can be justified; then this could result in a dwelling of up to a maximum of 135sqm. The Guidance therefore applies additional flexibility to that of the policy and provides clear expectations as to the justification for additional space.</p>
<p>Paragraphs 3.1 & 3.2</p>	<p>Concerns raised over consistency in the wording with regard to size allowed for a rural worker and succession farm worker dwellings: The Guidance indicates a “maximum gross internal area of 93 square metres”, while the Local Plan includes the proviso “unless it is demonstrated that a larger dwelling is required”.</p>	<p>Paragraph 3.1 and 3.2 have been amended to ensure wording accords with that in the Local Plan</p>
<p>Paragraph 3.4</p>	<p>A number of concerns were raised over the need to detail investment in machinery, land and buildings to justify a larger dwelling.</p>	<p>In acknowledging concern, the paragraph has been amended to read:</p> <p>Evidence of investment over the last 5-10 years that demonstrates a commitment to the business would be considered favourably. This could include for example investment in machinery, livestock, land or buildings.</p>

Policy / Plan Reference	Main Issues Raised	Response
Paragraph 3.5	Consultees argued that the whole income from the farm should be considered in determining the need for a rural worker dwelling or a succession farm worker dwelling, as many farm businesses depend on diversification for the financial sustainability of their enterprise.	Clarification has been provided to provide that incomes derived from diversification or other non-agricultural activities will not usually be considered as justification for additional space, when they do not contribute functionally to the farming activity and therefore do not demonstrate the sustainability of the farming enterprise in its own right.

4. A New Dwelling – Consideration of Location, Siting and Design

Policy / Plan Reference	Main Issues Raised	Response
Paragraph 4.27	Concerns raised as to why there was no reference to promoting eco-friendly buildings and/or renewable energy	SPD amended to encourage provision of on-site low carbon or small-scale renewable energy in accordance with local plan policy CC-S5 Low Carbon and Renewable Energy.

12. Appendix 1: Local Plan Policies

No comments received.

13. Appendix 2: Policy Checklist

No comments received.

REPRESENTATION STATEMENT CONSULTATION OCTOBER 2019 - JANUARY 2020:

A SUMMARY OF THE MAIN ISSUES RAISED

- 3.5 The Regulation 12 consultation was held from 23 October 2019. Following a request for an extension, the consultation period was extended from 20th November until 13th January 2020. The consultation documentation and information made clear that comments should be on how previous consultation responses had been addressed or on changes made to the document since the previous consultation. Respondents were requested not to provide any comments that had been made previously as these had already been considered.
- 3.6 Comments were received from North Devon Council (who were content with the draft SPD) and Cutcombe and Winsford Parish Councils. Natural England and Devon Wildlife Trust responded to confirm that they would not be submitting comments.

Responses to Regulation 12 Representation Statement Consultation

- 3.7 Of those responses considered to meet the consultation requirements the following points were made:
- Disappointment was expressed that some key points made previously have not been included;
 - The Guidance was considered to be too restrictive and more restrictive than the provisions in the Plan.

Additional comments which did not come within the scope of the consultation and which, in some cases, had been submitted through previous consultation were made by the parish councils and the CLA.

All representations within the scope of the consultation have been considered and taken account of by the National Park Authority including whether changes to the draft SPD are appropriate. It is considered that no further changes to the guidance are necessary.

Attachment 1: Informal Consultation Summer 2018

Examples of emails informing of the Informal Consultation.

Email sent 24 June 2018

The Exmoor National Park Authority has been drafting a guidance note to provide more clarity with regard to policies on rural worker and succession farm worker dwellings. We would like to invite you to a meeting to discuss this guidance at an early stage. Please note that this is an **informal consultation on a first draft. A formal consultation will take place in the Autumn** where you will be asked for more detailed comments. The questions we will be asking at this stage are:

What is helpful about the Guidance Note?

Is there anything that is unclear or unhelpful?

Do you have any suggestions as to how we could improve the Guidance Note?

The meeting will take place at **Exmoor House in Dulverton on Thursday 19th July 4.30-5.30pm.**

Please confirm if you are able to attend.

I look forward to hearing from you.

Kind regards

Jo Symons

Policy and Community Manager

Exmoor National Park Authority

Exmoor House, Dulverton, Somerset TA22 9HL

Email sent 5 June 2018

Dear Katherine

The Policy team have been working on producing guidance on rural worker and succession farm worker dwellings in order to provide further clarity and information on the policies as provided in the adopted Local Plan 2017. We are shortly to go out to informally consult with a small number of groups including yourself and agents. We would therefore be grateful if we could attend one of your forthcoming meetings to present and discuss the guidance. Please let me know if this would be ok and of any dates you may have in mind.

I look forward to hearing from you.

Kind regards

Jo Symons

Policy and Community Manager

Exmoor National Park Authority

Exmoor House, Dulverton, Somerset TA22 9HL

Attachment 2: Strategic Environmental Assessment Consultation

Document and consultation email

Strategic Environmental Assessment Consultation

Email sent 13 March 2019

The Exmoor National Park Authority has prepared a draft Supplementary Planning Document (SPD) for Rural Worker and Succession Farm Dwelling Guidance; and this has been approved by the Authority for formal consultation. As required by the Environmental Assessment of Plans and Programmes Regulations 2004, it has produced a draft Strategic Environmental Assessment and Habitats Regulations Screening Report and I have attached this, together with the SPD itself. In accordance with the Regulations, the Authority is notifying you of the draft SPD so that you may comment prior to the Authority commencing wider consultation.

I would therefore welcome any comments you have and would be grateful if you could respond if at all possible by Friday 12th April 2019.

I look forward to hearing from you.

Many thanks.

Kind regards

David Clews

Policy Officer

Exmoor National Park Authority

Exmoor House, Dulverton, Somerset TA22 9HL



Exmoor National Park Authority

Draft Supplementary Planning Document

Rural Worker and Succession Farm Dwelling Guidance

Strategic Environmental Assessment and Habitats Regulations Screening Report

1. Introduction

- 1.1 Formal planning documents must not breach, and otherwise must be compatible with EU obligations. These include the Strategic Environmental Assessment (SEA) Directive and Habitats Directive.
- 1.2 A Strategic Environmental Assessment (SEA) is required under European legislation² for all plans which may have a significant effect on the environment. “The Habitats Directive requires authorities to assess the impact of plans or projects that may have a significant effect on “European sites”. Authorities cannot consent to plans or projects they determine may have an “adverse effect on the integrity of a European site” (Special Areas of Conservation and Special Protection Areas) following such an assessment”. A Habitats Regulations Assessment (HRA) is a process which looks at the potential impact of proposals within a plan on European sites.
- 1.3 The Exmoor National Park Authority (ENPA) is required to determine whether or not the contents of the draft supplementary planning document (SPD) for Rural Worker and Succession Farm Dwelling Guidance requires a Strategic Environmental Assessment (SEA).

2. Legislative Background

- 2.1 The basis for Strategic Environmental Assessments and Sustainability Appraisal legislation is transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, known as the SEA Regulations (from here on referred to as “the Regulations”). Detailed Guidance on these regulations can be found in the Government publication ‘A Practical Guide to the Strategic Environmental Assessment Directive’³ and the National Planning Practice Guidance⁴.
- 2.2 The Habitats Regulations requires that any plan or project likely to have a significant effect on a European site must be subject to an Appropriate Assessment; part of the Habitats Regulations Assessment process is to ensure the plan is not likely to have a significant effect on a European site.
- 2.3 The Planning and Compulsory Purchase Act 2004 (as amended) requires a Sustainability Appraisal, incorporating SEA, to be carried out for Local Plans. The National Planning Practice Guidance (NPPG) explains that there is no legal requirement for supplementary planning guidance to have a sustainability appraisal⁵, but may in exceptional circumstances require a SEA if they are likely to have significant environmental effects that have not already been assessed during the preparation of the Local Plan. This Screening Opinion is intended to take account of Schedule 1 of the 2004 Regulations to decide whether significant environmental effects are likely.
- 2.4 Whether a plan requires a strategic environmental assessment, and (if so) the level of detail needed, will depend on what is proposed in the draft plan. A strategic environmental assessment may be required, for example, where:

² European Directive 2001/42/EC1

³ <https://www.gov.uk/government/publications/strategic-environmental-assessment-directive-guidance>

⁴ GOV.UK Strategic environmental assessment and sustainability appraisal 2015

⁵ [Strategic environmental assessment and sustainability appraisal - GOV.UK](#) Paragraph: 008 ID:11-008-20140306

- the plan allocates sites for development;
- the area contains sensitive natural or heritage assets that may be affected by the proposals in the plan;
- the plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

2.5 To decide whether an emerging plan might have significant environmental effects, its potential scope should be screened at an early stage against the criteria set out in Schedule 1 the Regulations⁶.

3. The draft supplementary planning document for Rural Worker and Succession Farm Dwelling Guidance

- 3.1 The draft SPD intends to assist those who are seeking to provide a rural worker or succession farm worker's dwelling. It expands on the provisions of the adopted Local Plan Policies HC-D9 (Rural Workers) and HC-D10 (Succession Farming – Second Dwellings on Established Farms). These Policies require development of this nature to meet certain functional and financial tests and the guidance explains in more detail how these issues should be addressed. It also explains size requirements and provides advice on considerations of location, siting and design.
- 3.2 The starting point of this guidance are the Exmoor National Park Local Plan policies, which along with any neighbourhood plans, forms the development plan for the Exmoor National Park. Planning law requires that planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise
- 3.3 Planning applications for rural workers' or succession farm workers' dwellings will be assessed against the Exmoor National Park Local Plan policies, which are set out in full in the Exmoor National Park Local Plan⁷.
- 3.4 National policy⁸ is that in rural areas, housing should be located where it will enhance or maintain rural settlements, and that new isolated homes in the open countryside should be avoided unless there are special circumstances, including for the essential needs of rural workers to live permanently at or near their place of work in the countryside.
- 3.5 It is important to emphasise that housing in the open countryside for rural workers is an exception to national policies of restraint for new development outside settlements. This is particularly the case in National Parks, which have the highest status of protection for landscape.⁹
- 3.6 The Rural Worker and Succession Farm Dwelling Guidance sits within the framework set by the Adopted Local Plan Policies which focus new build development in settlements identified in Policy GP3¹⁰. However, recognising that the housing needs of the farming community may arise outside of settlements, Local Plan policies make provision for rural workers' and succession farm

⁶ http://www.legislation.gov.uk/ukxi/2004/1633/pdfs/ukxi_20041633_en.pdf

⁷ <http://www.exmoor-nationalpark.gov.uk/planning/planning-policy>

⁸ Ibid

⁹ NPPF 2018 Paragraph 172

¹⁰ GP3 SPATIAL STRATEGY

workers' dwellings¹¹ where they are essential for the needs of the farm business and where the need cannot be met through existing or planned development; through:

- the extension or subdivision of an existing home;
- the conversion of an existing building in accordance with HC-D7 Conversions to Dwellings in the Open Countryside or HC-D5 for an Extended Family Dwelling;
- the provision of a temporary residential caravan in accordance with HCD11¹¹ of the Local Plan.
- Through the provision of a new dwelling in accordance with policy HC-D9 for a rural worker or HC-D10 for a succession farm worker.

4. Assessment of need for SEA

- 4.1 Table 1 assesses whether the draft supplementary planning document for Rural Worker and Succession Farm Dwelling Guidance will require a full SEA.

¹¹ The Exmoor National Park Local Plan has introduced a policy for Succession Farm Dwellings – an additional dwelling on a farm holding. The intention of the policy is to enable the older generation to reduce work through working part time (minimum of 0.5 equivalent), and the younger generation to assume responsibility for the full-time role on the farm. ¹¹ HC-D11 Residential Caravans

Table 1 - Assessment of need for SEA

CRITERIA (Schedule 1 of Environmental Assessment of Plans and Programmes Regulations 2004)	EXMOOR NATIONAL PARK AUTHORITY RESPONSE	Likely Significant Environmental effect
The characteristics of the plan having regard to -		
(a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.	<p>The draft SPD seeks to guide the development of additional farm dwellings to ensure the future economic viability of holdings and to seek to contribute to the conservation of the National Park.</p> <p>Guidance is provided in the SPD to ensure that the location, siting and design of buildings are appropriate and in accordance with other Local Plan policies. The Local Plan contains a range of policies, which must be read as a whole. The draft SPD sets out practical guidance on the implementation of the Local Plan, which has been subject to SEA/HRA. As a National Park, there is a suite of detailed policies to ensure development is consistent with National Park Purposes, including the conservation and enhancement of the area.</p>	No
(b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy.	The draft SPD augments policies within the adopted Local Plan, itself in accordance with the NPPF. The SPD also has regard to National Park Purposes.	No
(c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.	Policy GP1 of the adopted Local Plan seeks to ensure that all development should achieve National Park Purposes and sustainable development; the draft SPD does not alter this requirement.	No

(d) environmental problems relevant to the plan or programme.	As long as the guidance is followed and planning applications meet the required functional and financial tests; and other policies in the Local Plan are complied with, the environmental effects are likely to be minimal. The draft SPD sets out practical guidance on the implementation of the Local Plan, which has been subject to SEA/HRA.	No
(e) the relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).	The Guidance has to be in general conformity with the Local Plan, which itself complies with European legislation. It does not relate directly to other environmental programmes.	No
Characteristics of the effects and of the area likely to be affected, having regard, in particular to -		
(a) the probability, duration, frequency and reversibility of the effects.	The draft SPD allows for relatively small scale development throughout the National Park; therefore, some element of environmental change will take place. However, the overall impacts will be in accordance with the adopted Local Plan and unlikely to have a significant effect. The draft SPD sets out practical guidance on the implementation of the Local Plan, which has been subject to SEA/HRA.	No
(b) the cumulative nature of the effects.	The relatively small scale developments permitted by the draft SPD will be sparsely distributed throughout the National Park, so their cumulative impact is likely to be low.	No
(c) the transboundary nature of the effects.	The guidance contained within the draft SPD applies only to areas within the National Park, so there will be no transboundary effects.	No

<p>(d) the risks to human health or the environment (for example, due to accidents).</p>	<p>There is limited risk to human health or environment as a result of the guidance within the draft SPD.</p>	<p>No</p>
<p>(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected).</p>	<p>The draft SPD relates to the whole of the National Park, but the numbers of households that require additional dwellings on farms is likely to be relatively low. Such accommodation would also need to be justified in terms of functional and financial tests.</p>	<p>No</p>
<p>(f) the value and vulnerability of the area likely to be affected due to</p> <ul style="list-style-type: none"> i. special natural characteristics or cultural heritage; ii. exceeded environmental quality standards or limit values; or iii. intensive land-use. 	<p>The National Park includes a National Nature Reserve; SSSIs; Special Areas of Conservation; County/ Local Wildlife Sites; an International Dark Sky Reserve; Heritage Coast; National Priority Habitats and Species; Ancient Woodland; and Listed Buildings and Conservation Areas. However, the draft SPD does not alter the protection that the adopted Local Plan gives to these environmental, cultural and historic areas and features, so the direct environmental effects of the draft SPD are likely to be limited. The draft SPD sets out practical guidance on the implementation of the Local Plan, which has been subject to SEA/HRA.</p>	<p>No</p>
<p>(g) the effects on areas or landscapes which have a recognised national, Community or international protection status.</p>	<p>The National Park, (itself an International landscape designation) includes a National Nature Reserve; Special Areas of Conservation; International Dark Sky Reserve and Heritage Coast. However, the draft SPD does not alter the protection that the adopted Local Plan gives to these environmental features, so the direct effects of the draft SPD are likely to be limited.</p>	<p>No</p>
<p>Conclusion</p> <p>The Draft Supplementary Planning Document for Rural Worker and Succession Farm Dwelling Guidance is unlikely to have a significant effect on the environment.</p>		

Attachment 3: Formal Consultation Summer 2019

Examples of posters, leaflets, parish newsletters, press releases, other publicity

Email sent 16 April 2019

Dear Sir or Madam

I am writing to advise you of a forthcoming consultation on a Draft Supplementary Planning Document (SPD) relating to Rural Workers and Succession Farm Dwellings, following which the Document will be adopted and used in the consideration of planning applications.

The draft SPD intends to assist those who are seeking to provide a rural worker or succession farm worker's dwelling. It expands on the provisions of the adopted Local Plan Policies HC-D9 (Rural Workers) and HC-D10 (Succession Farming – Second Dwellings on Established Farms). These Policies require development of this nature to meet certain functional and financial tests and the guidance explains in more detail how these issues should be addressed. It also explains size requirements and provides advice on considerations of location, siting and design. The draft Guidance does not alter Local Plan policies and these will remain unchanged.

The consultation is likely to take place soon after the local government elections in May and will continue for a period of six weeks. Following this consultation, the comments received will be reported to a meeting of the Authority, with recommendations for any proposed changes. I am just letting you know in advance that I will be sending you the draft document in due course and that you will be invited to comment.

Yours faithfully

David Clews
Policy Officer
Exmoor National Park Authority
Exmoor House, Dulverton, Somerset TA22 9HL

Tel: 01398 323665

Working together for Exmoor

Press Release for Formal Consultation June 2019

NEW GUIDANCE AIMS TO KEEP EXMOOR FAMILIES FARMING

Exmoor National Park Authority is inviting comments on new guidance into how new homes for rural workers and farming families in the National Park can be applied for, as part of a public consultation running for six weeks until 18th June 2019.

The draft “Rural Worker and Succession Farm Dwelling Guidance” applies to those working in land-based businesses in the National Park, such as farming or forestry, and is supplementary to existing national guidelines as well as those set out in the Local Plan for the National Park.

Nationally, homes in the open countryside are only permitted in exceptional circumstances, such as needing a full-time worker permanently on site to tend livestock. Local planning policy further recognises that maintaining the fabric of Exmoor’s farming community is intrinsic to conserving the distinct landscapes and habitats of the National Park, along with the centuries-old farming practices that help sustain them.

For example, there is extra flexibility to help older farmers retire and a younger generation to take on responsibility for the farm business, or for larger dwellings to be applied for if the scale or nature of the enterprise demands it and the need can’t be met through alternative arrangements. But equally the rules are necessarily stringent around the impact of any new dwelling on the landscape to ensure they are sensitive to the unique character and scenic beauty of the National Park. These new guidelines are intended to help balance these two obligations.

Robin Milton, Chairman of the National Park Authority, said: “This is an important document for Exmoor and its communities to ensure there are opportunities for new housing where it is essential to working people being able to live locally and to conserve and enhance this beautiful area. It is intended to help applicants and all those involved in planning for farm dwellings in the National Park and we would love to hear people’s views.”

Martin Dewdney, Chairman of the National Park Authority Planning Committee, added: “If adopted this document will form part of an extensive toolkit on offer to help with these kinds of planning applications that also includes regular planning surgeries and free pre-application advice. As the Local Plan is already adopted, it won’t form part of the consultation, but we warmly welcome any comments focused on this latest guidance.”

The draft guidelines and comments form are available from the planning policy section of the Exmoor National Park Authority website* and as hard copies at the following locations: National Park Centres in Dulverton, Dunster and Lynmouth, Lynton and Porlock libraries, Exmoor House in Dulverton and West Somerset and North Devon Council Offices in Williton and Barnstaple.



Exmoor National Park Authority
Exmoor House
Dulverton
Somerset TA22 9HL
Tel: 01398 323665
www.exmoor-nationalpark.gov.uk
info@exmoor-nationalpark.gov.uk

A member of National Parks England and National Parks UK

This matter is being dealt with by:
David Clews

Tel: (01398) 323665

Date 7th May 2019

Dear Sir or Madam

**Rural Worker and Succession Farm Dwelling Guidance
Draft Supplementary Planning Document**

I am writing to advise you that the above Draft Supplementary Planning Document (SPD) has been approved by the Authority for public consultation. Responses received will be considered and any necessary changes made to the Document, after which it is intended that it will be adopted and used in the consideration of planning applications.

The draft SPD intends to assist those who are seeking to provide a rural worker or succession farm worker's dwelling. It expands on the provisions of the adopted Local Plan Policies HC-D9 (Rural Workers) and HC-D10 (Succession Farming – Second Dwellings on Established Farms). These Policies require development of this nature to meet certain functional and financial tests and the guidance explains in more detail how these issues should be addressed. It also explains size requirements and provides advice on location, siting and design considerations.

The starting point of this guidance are the Exmoor National Park Local Plan policies, which along with any neighbourhood plans, forms the development plan for the Exmoor National Park. Planning law requires that planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise. This guidance does not alter the provisions of the Local Plan policies and these will remain unchanged.

The consultation period runs from 7th May to 18th June 2019. I have attached the draft document for information; and also a form on which responses can be provided. Copies are available at Exmoor House, the National Park Centres at Dulverton, Dunster and Lynton; Porlock and Lynton Libraries; and the offices of North Devon District Council and Somerset West and Taunton Council. Please be aware that all representations received will be publicly available and will appear on the Exmoor National Park Authority website. However, all personal contact details will be removed. Following this consultation, the comments received will be reported to a meeting of the Authority, with recommendations for any proposed changes. Please ensure that any comments on the Draft SPD are received by the Authority no later than **18th June 2019**.

Yours Faithfully

David Clews
Policy Officer
Tel: 01398 323665
dclews@exmoor-nationalpark.gov.uk

Working
together
for **Exmoor**

**Draft Rural Worker and Succession
Farm Dwelling Guidance
Supplementary Planning Document
Consultation Response Form**



- This draft Supplementary Planning Document (SPD) has been approved by the Authority for public consultation.
- Please use this form if you wish to support or object to the Guidance.
- Representations received after 18th June 2019 will not be accepted.

Please ensure your response is returned to Exmoor National Park Authority by

18th June 2019

Please post to: Draft Rural Worker Consultation, Exmoor National Park Authority, Exmoor House, Dulverton, Somerset TA22 9HL

Or Email to: localplan@exmoor-nationalpark.gov.uk

Website www.exmoor-nationalpark.gov.uk

Part A – Contact Details

For your response to be valid you must provide your name and contact details below

Personal Details	Agent's Details (Please complete if applicable) <small>Where an agent is used, the agent will be the point of contact.</small>
TITLE	AGENT TITLE:
INITIAL	INITIAL
SURNAME	SURNAME
ORGANISATION <small>IF APPLICABLE</small>	COMPANY NAME:
ADDRESS	ADDRESS
POSTCODE	POSTCODE
EMAIL	EMAIL
TELEPHONE:	TELEPHONE
Signature:	Date:

*Please note that representations should be attributable to named individuals or organisations at a postal address. We are required to report comments received to the Authority. **Please be aware that all representations received by the National Park Authority will be publically available including on our website.** Any personal contact details received will be removed and will otherwise only be used by the Authority to keep the respondent informed of the Supplementary Planning Document's (SPD) progress if requested to do so.*

Please tick here to confirm you give your consent to the above use of your contact details

Please tick here to indicate if you wish to be kept informed of progress on the SPD

The Authority's Privacy Policy can be found on its website here: <http://www.exmoor-nationalpark.gov.uk/home/privacy>

Part B – YOUR CONSULTATION RESPONSE		
<i>Please note that only comments on the draft guidance document can be accepted</i>		
Paragraph or page number	State: Support / Object / General Comment	COMMENT

All documentation and further information on the Draft SPD is available at www.exmoor-nationalpark.gov.uk

Rural Worker and Succession Farm Dwelling Guidance Consultation – Website Text

Draft Rural Worker and Succession Farm Dwelling Guidance together with the Strategic Environmental Assessment and Habitats Regulations Screening Report are published for public consultation from **Tuesday 7th May** until **Tuesday 18th June 2019**

The draft document intends to assist those who are seeking to provide a rural worker or succession farm worker's dwelling. It therefore sets out detailed guidance on the practical aspects of making planning applications for new homes for those working in land based businesses in the National Park. Adopted Local Plan policies require such development to meet certain tests and the draft guidance explains in more detail how these issues should be addressed. It also explains size requirements and provides advice on location, siting and design considerations.

The document is intended to be formally adopted as a Supplementary Planning Document to enable greater weight to be given to it when deciding relevant planning applications. This public consultation exercise provides an opportunity for you to have your say on the proposed guidance.

Details on the consultation and how you can view the documents are available below. The response form is also available to view and download to enable you to provide comments. If you need more space, then further forms can be printed or photocopied or additional sheets appended. Comments can only be made on the draft guidance as the Local Plan is already adopted and therefore it does not form part of the consultation.

Copies of the reports are available at

- Exmoor House in Dulverton;
- the National Park Centres at Dulverton, Dunster and Lynmouth;
- Lynton and Porlock libraries; and
- Somerset West and Taunton Offices in Williton and North Devon Council Offices in Barnstaple.

CONSULTATION DOCUMENTS

Covering Letter Notification Document	PDF
Draft Rural Worker and Succession Farm Dwelling Guidance document	PDF
Strategic Environmental Assessment and Habitats Regulations Screening Report	PDF
Response Form	Word

Representations must be in writing and should be sent to the Authority by **18th June** either By post:

Draft Rural Worker Consultation,
Exmoor National Park Authority,
Exmoor House,
Dulverton,
Somerset
TA22 9HL

Or email: localplan@exmoor-nationalpark.gov.uk

Email sent 27 June 2019

Dear Sir or Madam

Following a request from several parish councils, we have agreed to extend the end date of the consultation period for the Draft Rural Worker and Succession Farm Guidance from 18th June to 31 July. This is to ensure that there is sufficient time for all consultees to consider the document and provide responses.

Kind regards

David

David Clews

Policy Officer

Exmoor National Park Authority

Exmoor House, Dulverton, Somerset TA22 9HL

Tel: 01398 323665

Working together for Exmoor

Consultees

Statutory Consultees
Environment Agency
Natural England
Historic England
Other Consultees
North Devon District Council
West Somerset Council
Somerset County Council
Devon County Council
Exmoor Parish/ Town Councils
Exmoor Society
Exmoor Young Voices
Exmoor Hill Farm Network
Exmoor Uprising
Exmoor Trust
Farmers Weekly
National Trust
Country Land and Business Association
National Farmers Union
Addington Fund
Woodland Trust
Exmoor Farmers
Local Architects, Estate Agents, Surveyors and Planning Agents.
Representatives on the Local Plan Consultation Database

Attachment 4: Regulation 12 Representation Consultation Autumn/Winter 2019/20

Examples of emails and website text

Rural Worker and Succession Farm Dwelling Guidance

Email Sent: 23 October 2019 16:02

Subject: Public Consultation on the Representation Statement and draft final Rural Worker and Succession Farm Worker Dwellings Guidance

I am writing to let you know that a Representation Statement has been produced which explains how the consultation has been carried out at key stages in the preparation of the Rural Worker and Succession Farm Worker Dwellings Guidance and addresses the following:

- Illustrates the organisations and individuals who were invited to make representations,
- Shows how they were invited to make representations,
- Summarises the main issues raised as a result of the consultation, and
- Shows how those main issues have been addressed in the Rural Worker and Succession Farm Worker Dwellings SPD.

This Statement and the amended draft final Rural Worker and Succession Farm Worker Dwellings Guidance are published for public consultation from Wednesday 23 October until Wednesday 20th November.

The guidance is due to be finalised in November and will be widely publicised once adopted.

Copies of the documents are attached and are available in hard copy at Exmoor House in Dulverton during office hours. They are also available for download from the website <https://www.exmoor-nationalpark.gov.uk/planning/planning-policy/rural-worker-and-succession-farm-dwelling-guidance-consultation>.

The response form is also attached and available to view and download from our website. If you need more space, then further forms can be printed or photocopied or additional sheets appended. **Please do not respond to this email but send any responses or queries to localplan@exmoor-nationalpark.gov.uk OR send any hard copies to Ruth McArthur, Exmoor National Park Authority, Exmoor House, Dulverton, Somerset EX22 9HL**

Please do not provide any comments that have been made previously as these have already been considered.

Please be aware that all representations received will be publicly available and may appear on the Exmoor National Park Authority website. However, all personal contact details will be removed. Please ensure that any comments on the Draft SPD are received by the Authority no later than **20th November 2019**.

Kind regards

Jo Symons

Policy and Community Manager

Email Sent: 29 November 2019 12:15

To: localplan <localplan@exmoor-nationalpark.gov.uk>

Subject: Public Consultation on the Representation Statement and draft final Rural Worker and Succession Farm Worker Dwellings Guidance

Further to the email below, I am writing to let you know that a Representation Statement has been produced which explains how the consultation has been carried out at key stages in the preparation of the Rural Worker and Succession Farm Worker Dwellings Guidance and addresses the following:

- Illustrates the organisations and individuals who were invited to make representations,
- Shows how they were invited to make representations,
- Summarises the main issues raised as a result of the consultation, and
- Shows how those main issues have been addressed in the Rural Worker and Succession Farm Worker Dwellings SPD.

This Statement and the amended draft final Rural Worker and Succession Farm Worker Dwellings Guidance were published for public consultation from Wednesday 23rd October until Wednesday 20th November. I am writing to tell you that **the consultation period has been extended and comments will now be accepted until 13th January 2020.**

The guidance is due to be finalised in early 2020 and will be widely publicised once adopted.

Copies of the documents are attached and are available in hard copy at Exmoor House in Dulverton during office hours. They are also available for download from the website <https://www.exmoor-nationalpark.gov.uk/planning/planning-policy/rural-worker-and-succession-farm-dwelling-guidance-consultation>.

The response form is also attached and available to view and download from our website. If you need more space, then further forms can be printed or photocopied or additional sheets appended.

Please do not respond to this email but send any responses or queries to localplan@exmoor-nationalpark.gov.uk OR send any hard copies to Ruth McArthur, Exmoor National Park Authority, Exmoor House, Dulverton, Somerset TA22 9HL

- Please do not provide any comments that have been made previously as these have already been considered. Instead this consultation provides an opportunity for comments on how your previous consultation response has been addressed or on the changes made to the Draft Final Rural Worker and Succession Farm Workers Guidance document since the previous consultation.

Please be aware that representations should be attributable to named individuals or organisations at a postal address. We are required to report comments received to the Authority. **Please note** therefore that all representations received will be publicly available and may appear, with your name / organisation on the Exmoor National Park Authority website. However, all personal contact details will be removed. Please ensure that any comments on the Draft SPD are received by the Authority no later than **13th January 2020.**

Kind regards

Ruth McArthur
Policy and Community Manager

Rural Worker and Succession Farm Dwellings Guidance Consultation Findings

A Representation Statement has been produced which explains how the consultation has been carried out at key stages in the preparation of the Rural Worker and Succession Farm Worker Dwellings Guidance and addresses the following:

- Illustrates the organisations and individuals who were invited to make representations,
- Shows how they were invited to make representations,
- Summarises the main issues raised as a result of the consultation, and
- Shows how those main issues have been addressed in the Rural Worker and Succession Farm Worker Dwellings SPD.

This Statement and the amended draft final Rural Worker and Succession Farm Worker Dwellings Guidance were published for public consultation from Wednesday 23 October until Wednesday 20th November. **The deadline has been extended and representations will now be accepted until 13th January 2020.**

The guidance is due to be finalised early in 2020 and will be widely publicised once adopted.

The draft Guidance intends to assist those who are seeking to provide a rural worker or succession farm worker's dwelling. It therefore sets out detailed guidance on the practical aspects of making planning applications for new homes for those working in land based businesses in the National Park. Adopted Local Plan policies require such development to meet certain tests and the draft guidance explains in more detail how these issues should be addressed. It also explains size requirements and provides advice on location, siting and design considerations. The document is intended to be formally adopted as a Supplementary Planning Document to enable greater weight to be given to it when deciding relevant planning applications.

Copies of the documents are available at Exmoor House in Dulverton during office hours, and are available for download below. The response form is also available to view and download to enable you to provide comments. If you need more space then further forms can be printed or photocopied or additional sheets appended.

Comments should be on how your previous consultation response has been addressed or the changes made to the document since the previous consultation. Please do not provide any comments that have been made previously as these have already been considered.

**Draft Final Rural Worker and
Succession Farm Dwelling Guidance
Supplementary Planning Document
Consultation Response Form**



- The draft Supplementary Planning Document (SPD) has been amended in response to representations received during the Public Consultation in the Summer 2019.
- **Please use this form only if you wish to make any comments on how your previous consultation response has been addressed or changes made to the document since the previous consultation.**

Please ensure your response is returned to Exmoor National Park Authority by

13th January 2020. Representations received after this date will not be accepted

Please post to: Draft Final Rural Worker Consultation, Exmoor National Park Authority, Exmoor House, Dulverton, Somerset TA22 9HL

Or Email to: localplan@exmoor-nationalpark.gov.uk
Website www.exmoor-nationalpark.gov.uk

Part A – Contact Details

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Please tick here to confirm you give your consent to the above use of your personal details

Please tick here to indicate if you wish to be kept informed of progress on the SPD

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Part B – YOUR CONSULTATION RESPONSE <i>Please note that only comments on the draft guidance document can be accepted</i>		
Paragraph or page number	State: Support / Object / General Comment	COMMENT

All documentation and further information on the Draft SPD are available at www.exmoor-nationalpark.gov.uk