EXMOOR NATIONAL PARK LOCAL PLAN 5 YEAR POLICY REVIEW

ECONOMY TOPIC PAPER: INTERIM REPORT NOV 2021

1. Introduction

This part of the topic paper relates to section 7 'Achieving a Sustainable Economy, Section 8 'Achieving Enjoyment for All' and Section 9 'Achieving Accessibility for All' of the adopted Local Plan. The policies cover a range of development from business and agricultural and forestry to recreation and tourism, transport and telecommunications development. The General Policies in section 3 of the Local Plan are relevant to all applications and cover National Park Purposes and Sustainable Development, the efficient use of land and buildings, the spatial strategy, and major development.

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

2. National Planning Policy and Legislation

Changes to the National Planning Policy Framework (NPPF) have been made since the Local Plan was adopted.[1] In addition, there have been national changes to the Use Classes Order which has been amended to create a new Use Class E (Commercial, Business and Service). This combines a broad range of uses such as retail, business, some residential institutions and indoor sport. A new use F (Local Community and Learning) has also been created.[2] Additionally, changes to permitted development rights have been introduced (although many do not apply in National Parks, and for some development it is necessary to obtain prior approval), consequently, unless there are other aspects of a proposal that require planning permission, the National Park Authority will not be notified of permitted development (PD). Two losses of business uses to market housing have been recorded, as PD rights outweighed Local Plan policies seeking to safeguard employment land and housing policy. However this right no longer applies in National Parks and further losses should therefore be avoided.

[1] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

[2] https://www.planningportal.co.uk/info/200130/common_projects/9/change_of_use

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

Officers have checked that adopted plan policies still reflect current national planning policy requirements in the 2021 NPPF. The analysis has focused on changes since the 2012 NPPF because an independent inspector concluded that the Exmoor Local Plan environment policies were in line with the 2012 NPPF and much of the 2021 NPPF has been carried forward from 2012.

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

There are relatively few changes to the NPPF in relation to **economic development in rural areas.** Those considered to be most relevant are considered. The NPPF seeks to enable appropriate development which respects the character of the countryside, this is particularly important in the National Park. There is a new emphasis on retention and development of *accessible* local services and community facilities.

A new paragraph recognises that suitable sites for business and community needs may need to be adjacent to or beyond existing settlements and in locations that are not well served by public transport. They should be sensitive to their surroundings. It also encourages the use of previously developed land, and sites that are physically well-related to existing settlements. The Local Plan enables employment development to be considered on the edge of/well related to settlements if suitable sites/buildings in settlements are not available in them. Siting most development close to existing services and facilities benefits communities, helps reduce the need to travel and is consistent with the Plan's overall approach in the spatial strategy (GP3), policies on community services and facilities, climate change, transport and the need to conserve the National Park's landscape.

The Local Plan encourages employment provision in the open countryside. This is through extensions to existing employment uses, reuse of existing buildings and, in some circumstances, redevelopment of existing sites.

The 2021 NPPF refers to sustainable rural tourism and leisure developments which respect the character of the countryside**.** This is unchanged from the 2012 version. **Recreation and tourism** is a key sector underpinning the National Park economy and helping support local services and facilities. Related to recreation and tourism polices in section 8 of the Local Plan, the 2021 NPPF notes the importance of high-quality open spaces. New wording recognises it can deliver **wider benefits for nature** and support efforts to **address climate change**. As well as recreation and tourism policies, this national policy is therefore relevant to a range of other Local Plan policies including biodiversity and green infrastructure in section 4, and community polices in section 6 of the Local Plan; particularly those that safeguard existing open space and recreational areas or enable new areas. NPPF references to protection of public rights of way and opportunities for improving them for users e.g. through better linkages are also relevant to section 8 of the Local Plan but the NPPF provisions are unchanged.

Many of the NPPF changes for **transport** relate to high growth areas and larger scale development and these are therefore not key considerations on Exmoor given the level of development expected in a National Park. This is recognised by the NPPF's continued recognition that opportunities to maximise sustainable transport solutions will vary between urban and rural areas. Section 9 of the Local Plan contains policies for transport. They apply principles such as seeking to reduce the need to travel appropriately in a local context which while recognising private transport will continue to be essential for most, focusing most development in named settlements through the spatial strategy is important in minimising the need to travel. Other changes in the NPPF on transport relate to:

- **Environmental impacts** and **improvement of air quality** and **public health**.
- **Integrating good design** (including transport and movement) **and responding to local character and design standards**. This links with the focus on design and beauty elsewhere in the NPPF. The NPA is preparing a design guide which will take account of the updated NPPF.
- An increased focus on **walking and cycling.** The 2021 NPPF applies a hierarchy approach prioritising pedestrian and cycle movements, and then access to public transport**.**
- **Spaces for charging plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations**. Electric vehicle charging was referred to in the 2012 NPPF. The NPPF is a material consideration in decision making.
- **Maximum parking standards** which should only be set to manage the local road network, or for new development well served by public transport. The Exmoor Local Plan sets out parking guidelines not maximum parking standards
- Developments generating significant amounts of movement should provide a **travel plan** and be supported by a **transport statement or assessment**. Local Plan Policy AC-D1 requires a Transport Assessment or Statement in such cases and in some circumstances, an air quality assessment and a Travel Plan.

Since 2012, NPPF changes on **electronic communications** reflect the Government's view that advanced, high quality and reliable communications infrastructure is essential for economic growth **and social well-being.** They include:

- Reference to **next generation mobile technology (such as 5G)** and **full fibre** broadband **connections.**
- **Access** to, **delivery** and **upgrading** of **high-quality digital infrastructure from a range of providers, prioritising full fibre connections to existing and new developments.**

Consideration of the NPPF is a material consideration in decision making. Roll out of broadband has been challenging in other remote rural areas as well as Exmoor. The NPA has been working with partners including through "Connecting Devon and Somerset" to improve access to broadband. Information on this is available on the ENPA website.[3]

– Use of existing masts, buildings and other structures for **new electronic communications capability (including wireless)** should be encouraged. Where new sites are required **(such as for new 5G networks),** equipment should be sympathetically designed and camouflaged where appropriate. Electronic communication policies are in Section 9 of the Local Plan. Policies AC-S4 and AC-D5 (pages 268-269 of the Plan) apply these principles consistent with the need to avoid unacceptable impacts on the National Park landscape. Other provisions are a material consideration in decision making.

3. New and Updated Evidence

Rural Enterprise Exmoor

The Rural Enterprise Exmoor Research Report was published in 2020.[4] It was commissioned to identify business activity across Exmoor. It provides an up-to-date baseline of business activity pre Covid-19 (data collection was completed approx. 6 weeks before the first lockdown).[5]

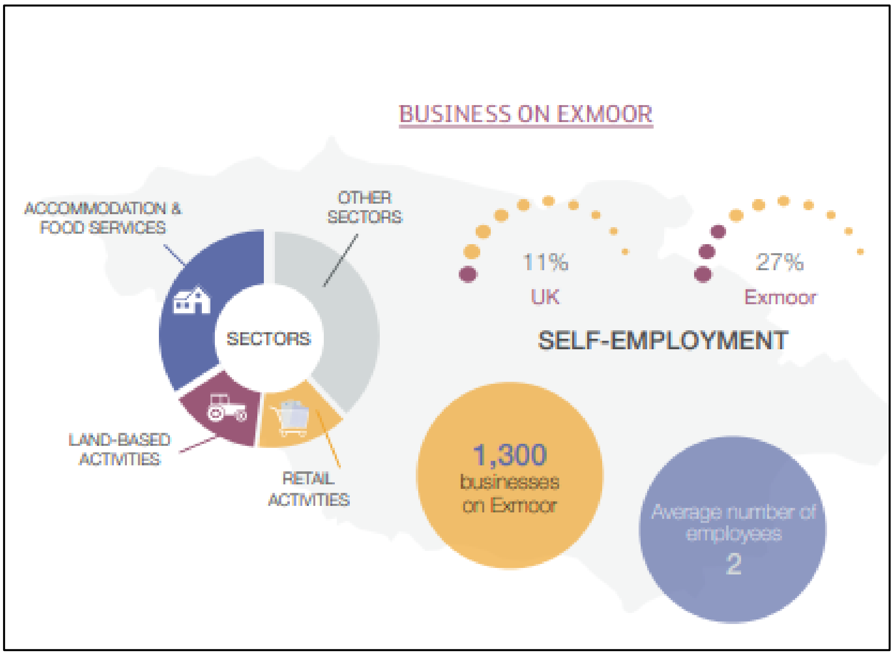
The report revealed a 60% increase in the number of businesses than had previously been identified through national data sets and provided a significant insight into business views. The findings showed that:

- Overall, there are 1,300 businesses providing an estimated 5,042 Full Time Equivalent (FTE) jobs across Exmoor National Park.
- Most businesses are micro (0-9 employees) in size with the average number of full-time paid workers at between 2 and 4 per business.
- Over a third of businesses are based from home (35%).
- Self-employment is over double the UK average (27% vs. UK 11%)
- Accommodation and food and drink services are the largest business sector - 38% of total businesses and 44% of all employment.

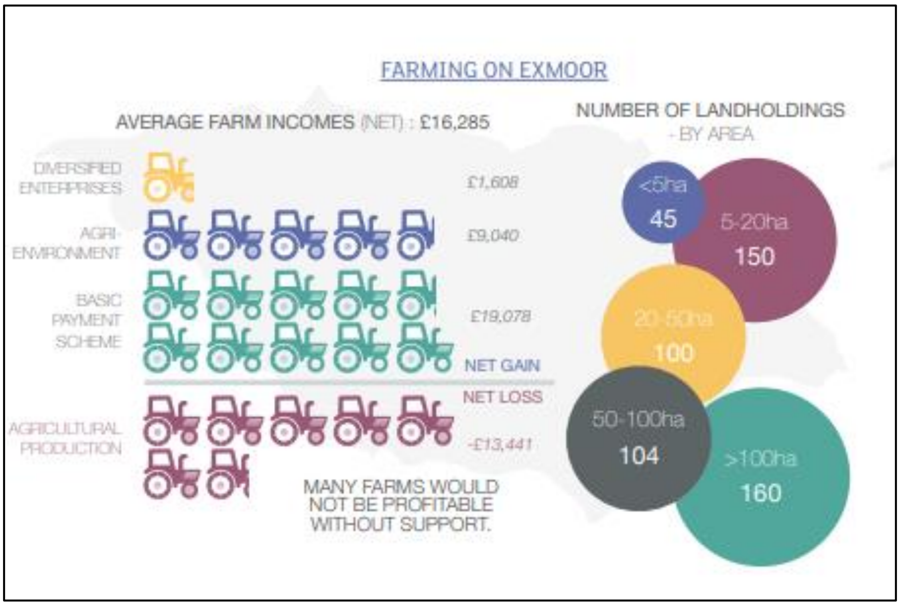
[3] https://www.exmoor-nationalpark.gov.uk/living-and-working/superfast-broadband

[4] https://www.exmoor-nationalpark.gov.uk/living-and-working/business-and-economy/rural-enterprise-exmoor-research

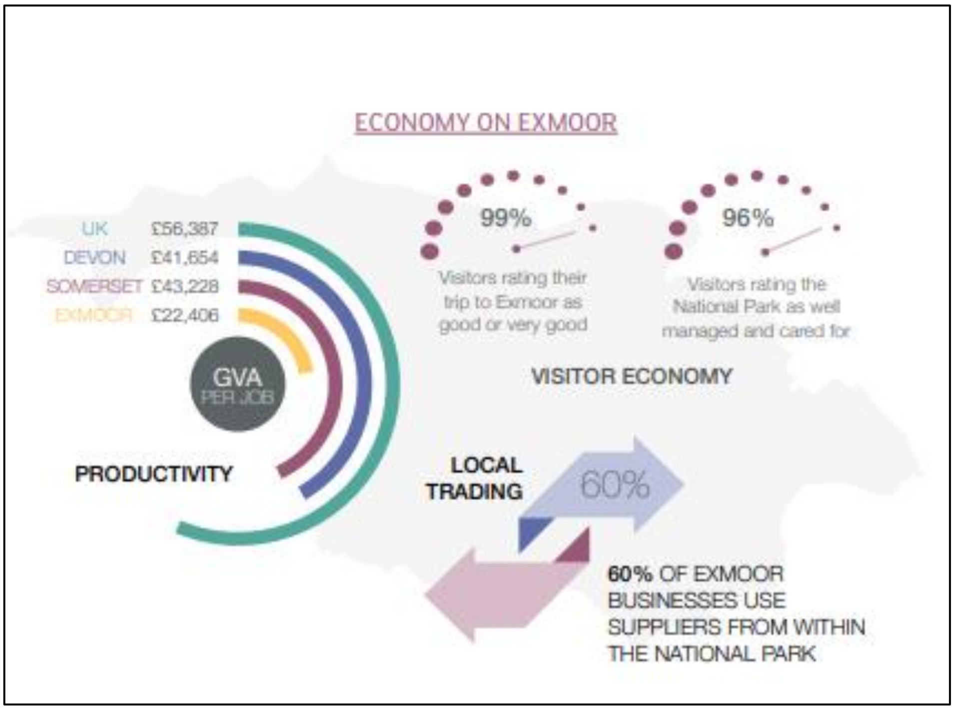
[5] Research commissioned in 2019 by a partnership including the Heart of the South West Local Enterprise Partnership, four local authorities for the National Park area and the NPA. In 2020 the project partnership was expanded to include representative business groups (Exmoor Hill Farming Network, Visit Exmoor, West Somerset Business Group and the Federation of Small Businesses)



- Agriculture and retail are the second largest sectors each accounting for 14% of total business and around 9% of employment. A summary of farming on Exmoor is below.



- Poor connectivity – both physical and digital networks – were seen as the biggest barriers to doing business on Exmoor.
- The status of the National Park and its natural and historic assets were highly valued for their ability to attract customers. Over half of businesses (52%) also identified wellbeing benefits for staff as important.
- 40% of businesses thought the National Park designation provided a positive opportunity; 10% considered the National Park designation presented challenges.



A long-term vision for Rural Enterprise on Exmoor (REE) has been developed in response to the research work, as well as the impacts of Covid-19 changes.[6] The starting point was recognition that Exmoor is a remote and deeply rural area. It has low social mobility, below average wages and higher than average house prices. The economy is highly reliant on two sectors (tourism and agriculture) both of which are linked to the delivery of National Park purposes, but which are vulnerable to external factors.

Exmoor's National Park designation, and its high-quality landscape, presented a number of unique opportunities and challenges requiring a specific approach to rural development to support the rural economy in harmony with Exmoor's status as a National Park.

The Rural Enterprise Exmoor Vision, launched in 2021, is a high-level vision for 2030 that has been developed on behalf of the REE Partnership.

The overarching ambition of the vision is to support "an economy building community wealth, sitting lightly in its environment and creating opportunities from its special qualities." It identifies: two significant 'drivers of change':

- An increasingly green agenda in response to the climate and nature emergencies;
- A technologically driven digital world.

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

[6] https://www.exmoor-nationalpark.gov.uk/living-and-working/business-and-economy/rural-enterprise-exmoor-vision

Key Findings were:

- Despite the smaller scale of the businesses operating in Exmoor National Park, 73% are established businesses looking to survive and grow, with 9% some type of lifestyle business.
- 16% of businesses operating on Exmoor were looking to recruit in the next 12 months though availability of labour was a barrier for over one-quarter of respondents. Transport connectivity was the most frequently cited barrier
- Broadband connectivity was seen as a challenge by 39% of businesses, and 44% of tourism related businesses.
- Local housing was seen as a key issue (see housing topic paper).
- Perception of Planning was seen as a challenge, though few themselves had actual experience with planning restricting what they could do. The ENPA planning team were also praised for their willingness to discuss ideas prior to planning applications (and their collaborative approach to planning proposals). The National Park Authority has had one of the highest planning approval rates in the country.

The REE Vision is now adopted but is not a traditional economic strategy in either its content or structure. No single organisation has a sole remit covering the breadth of activity incorporated. The Vision will be updated to take account of changing contexts and priorities, whilst maintaining a long-term approach. It provides suggestions to be discussed, agreed and delivered in ways which are appropriate to Exmoor and its particular circumstances.

Tourism Data

As part of the 5-year plan review, officers have analysed evidence from 'STEAM'. This is a model to estimate the volume and value of tourism, including visitor numbers, days, expenditure and employment. It is considered most accurate when considering trend data.[7]

Key findings are that between 2009 and 2019, visitor numbers grew by 6% whilst visitor days grew by 15% indicating stays of a longer duration. The data also indicates that there was an increase in average spend per head, and that:

- Serviced accommodation visitor days increased by 23,000
- Non-serviced accommodation visitor days increased by 240,000
- Employment in serviced accommodation fell by 44
- Non-serviced accommodation employment increased by 186
- Day visitor direct employment increased by 17

Trends 2009-2019

	2009	**2019**	% **change**
Economic Impact (m) – Historic Prices	£85.16m	**£133.62**	**57%**
Economic Impact (m) – 2019 Indexed	£114.7m	**£133.62m**	**17%**
Visitor Numbers (m) …	*1.38m*	***1.46m***	***6%***
Visitor Days (m)…	2.02m	**2.31m**	**15%**
Total Employment (FTE)…	2,056	**2,278**	**11%**

STEAM 2020 Data (Covid impacts)

- When 2019 is compared to 2020, visitor numbers decreased less than visitor days reflecting a higher proportion of day visits

[7] https://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0019/400843/Exmoor-NPA-Final-STEAM-2009-2020-23-Aug-21-CC.pdf

- Expenditure/employment saw a significantly bigger fall than visitor numbers/days indicative of non-spending visitors from May-July when the countryside was open, but businesses were closed

Headline figures for 2020 vs 2019

	2019	**2020**	**% change**
Economic Impact (m) – Historic Prices	£133.62m	**£69.48m**	**-48%**
Economic Impact (m) – 2020 Indexed	£137.21m	**£69.48m**	**-49%**
Visitor Numbers (m) ...	*1.46m*	***1.11m***	***-24%***
Visitor Days (m)...	2.31m	**1.52m**	**-34%**
Total Employment (FTE)...	2,278	**1,288**	**-43%**

- Serviced accommodation has been impacted the most in the past year, whilst day visitors have been least impacted
- Overall, 2019-2020 is similar to that seen in other National Parks

2020 vs 2019 by visitor type

	Serviced accommodation	**Non serviced accommodation**	**SFR**	**Day visitors**
Economic Impact (m) – Historic Prices	-59%	-47%	-50%	-40%
Visitor Numbers (m) ...	-60%	-50%	-52%	-16%
Visitor Days (m)...	-61%	-50%	-51%	-16%

Exmoor National Park Visitor Surveys

Exmoor National Park Authority conducts visitor surveys, usually carried out every two years. Their purpose is to improve understanding of a range of factors including the motivations for visits, where visitors have travelled from and the activities they take part in. The most recent 2020 survey was conducted virtually due to Covid restrictions. [8] The previous survey during the Local Plan period was the 2018 visitor survey. The results of the most recent (non-virtual) survey are expected in early 2022.

Exmoor Covid Recovery

As the primary data for the Rural Enterprise Exmoor work was collected prior to the impact of Covid-19 on the UK economy, a further survey was undertaken to sit alongside the baseline data collected to provide an overview of the economic impact of Covid-19 on the economy. The business impact survey was published alongside the main REE research report. The survey suggested two thirds of all Exmoor businesses had to cease trading with 89% reporting a negative impact on trading.

The most recent Exmoor Covid Recovery report (March 2021) recognises that tourism is the dominant contributor to Exmoor's economy accounting for approximately. 60% of all employment in the National Park. Its annual value in 2019 was nearly £134m.[9]

The Report highlights the considerable challenges of the Covid pandemic to a tourism-based economy as well as benefits from more people staying in the UK. STEAM data (above) indicated that visitor numbers were good outside of lockdown periods and most accommodation providers reported they were full for the summer once restrictions eased. However, many were reportedly former bookings carried over. Overall, there may be signs of the local economy improving as the majority of business restrictions have been lifted although businesses face continued challenges with rising costs and recruitment issues.

4. Duty to Co-operate Outcomes

A Duty to Co-operate meeting was held with local authority partners on 27 September 2021. No significant issues with the current adopted Local Plan economy policies were identified at the meeting. A number of areas relating to future work and updating of evidence were identified which will form the basis for ongoing future discussions. This includes the availability of suitable employment sites within and adjoining the National Park. A number of topics were discussed including:

- The economy, Rural Enterprise Exmoor work and vision, the effects of Covid restrictions on businesses, the post-Covid economic recovery plan
- Economic Development Strategy Innovation and the climate response, opportunities to work collaboratively on actions such as electric vehicle charge points, and energy plans (including renewable energy)

[8] https://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0015/332151/Exmoor-Virtual-Visitor-Survey-Covid-19-impact-final-results.pdf

[9]

- Visitor numbers and 'pop up' campsites through temporary extended permitted development rights
- Infrastructure and digital connectivity

5. The Exmoor National Park Authority Monitoring Report (AMR)

The Local Plan policies are monitored through the Authority Monitoring Report (AMR). Data is gathered on monitoring indicators linked to the objectives and the Plan's policies. Since Local Plan adoption, AMRs have been published for 2017/18 - 2018/19.[10] The 2019/20 and 2020/21 AMR is nearing completion and relevant data is summarised in this paper.

Business Development

The AMR monitoring indicates that policies are enabling new business uses although some have also been lost. 10 live work/homeworking applications have been permitted since the Local Plan was adopted.

Table 1 Business development					
Indicator		**2017/18**	**2018/19**	**2019/20**	**2020/21**
New employment premises (sqm) created, by location and use class (offices, research & development, light industry, general industry, storage & distribution, sui generis)	Named settlements	3 (186sqm)	0	0	1 (88sqm
	Open countryside	0	0	1 (55sqm)	2 (1532sqm)
Employment premises (sqm) lost, by location and use class (offices, research & development, light industry, general industry, storage & distribution, sui generis)	Named settlements	1 (66sqm	1 (116sqm)	0	0
	Open countryside	0	0	0	0
Number and area (sqm) of live-work units/homeworking spaces permitted		4 (85sqm)	0	2 (67.96sqm)	4 (86.85sqm)

Agricultural and forestry development

The AMR monitoring indicates that the policies are enabling agricultural and forestry development which is one of the most numerous forms of development proposal in the National Park. 75 agricultural and forestry buildings have been permitted since the Local Plan was adopted. 1,680m of agricultural and forestry track have been permitted since adoption of the plan.

[10] https://www.exmoor-nationalpark.gov.uk/planning/planning-policy/local-plan/annual-monitoring-reports

Table 2 Agricultural and forestry development				
Indicator	**2017/18**	**2018/19**	**2019/20**	**2020/21**
Number and area (sqm) of agricultural and forestry buildings permitted	26 (6153sqm)	15 (3624sqm)	19 (5943.2sqm)	15 (3803.77sqm)
Length of agricultural and forestry tracks permitted	865m	520m	0m	295.2m
Number/% of applications agricultural buildings refused	3 (10.3%)	2 (11.7%)	1 (5%)	5 (25%)

Serviced and non-serviced accommodation

Analysis of the AMR indicates that Plan policies are enabling tourism related development to come forward – 14 applications have been permitted since 2017. 6 serviced accommodation uses (hotels and guest houses) have been lost although one application was permitted in 2020/21. By contrast 17 non serviced accommodation (holiday lets) have been permitted since the Plan was adopted. Four were refused therefore the majority of applications have been approved.

Table 3 Recreation & tourism - serviced and non-serviced accommodation				
Indicator	**2017/18**	**2018/19**	**2019/20**	**2020/21**
Number and proportion of applications for tourism related development permitted	7 (100%)	0	3 (100%)	4 (100%)
Number and proportion of applications for tourism related development refused	0	0	0	0
Number and floor area (sqm) of serviced accommodation units permitted	0	0	0	1 (238sqm)
Number and floor area (sqm) of serviced accommodation units lost	0	3 (2627sqm)	2 (608.4sqm)	1 (80sqm)
Number and floor area of non-serviced accommodation permitted	2 (357sqm)	7 (678sqm)	2 (216sqm)	6 (1351.3sqm)
Number and floor area of non-serviced accommodation refused	0	0	4 (546.3sqm)	0

Camping and glamping accommodation

The AMR monitoring indicates that the policies are enabling relatively low numbers of camping accommodation including camping barns and alternative camping accommodation such as shepherd's huts. No tented campsites have been approved or refused since adoption of the local plan. The figures do not include ''pop up campsites' which can operate for a limited number of days per year within permitted development rights. The number of days has been increased temporarily during the Covid -19 pandemic from 28 to 56 days. A number of sites have been provided through this route.[11]

Table 5 Recreation & tourism - camping accommodation				
Indicator	**2017/18**	**2018/19**	**2019/20**	**2020/21**
Number of proposals for tented campsites permitted	0	0	0	0
Number of proposals for tented campsites refused	0	0	0	0
Number of proposals for camping barns permitted	1	2	0	0
Number of proposals for camping barns refused	0	0	1	0
Number of applications for conversion of static caravan sites to chalet developments or alternative camping sites permitted	1	0	0	0
Number of alternative camping accommodation proposals permitted	1	1	0	1
Number of alternative camping accommodation proposals refused	0	2	0	0

Recreational Development

Analysis of the AMR shows that Plan policies are enabling recreational development to come forward. In particular equestrian developments. Since the Plan was adopted four applications have been refused but 18 have been approved. Three shooting developments have been approved in 2919/20 and 2020/21.

[11] https://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0031/379318/Farm-Based-Camping-Guidance-Quick-Guide.pdf

No public rights of way have been created, lost or diverted as a result of development. However, changes to rights of way on Exmoor are generally as a result of work outside the planning system.

Table 6 Recreation development				
Indicator	**2017/18**	**2018/19**	**2019/20**	**2020/21**
Number and area of developments for shooting purposes permitted	0	0	1 (390sqm)	2 (21sqm)
Number and area of developments for shooting purposes refused	0	0	0	0
Number of equestrian developments permitted	3	5	7	3
Number of equestrian developments refused	0	2	2	0

Transport and electronic communications

AMR monitoring has shown, other than parking provision associated with developments, the relatively low number of proposals which have come forward related to transport matters reflecting the limited amount and scale of development in the National Park. 16 telecommunication masts have been permitted since 2017. The number of new masts permitted demonstrates that ENPA continues to respond to applications for masts for telecommunications infrastructure which are important for digital connectivity, and that they can be designed and sited carefully to avoid detracting from the landscape character. An appeal for a mast which has been allowed is of concern to the NPA.

There have been significant past efforts to support the roll out of broadband and mobile connectivity in the National Park including though 'Connecting Devon and Somerset'. This has been necessary because of the challenges that need to be overcome and because of the importance of digital connectivity for businesses and residents.

Table 7 Transport development and electronic communications				
Indicator	**2017/18**	**2018/19**	**2019/20**	**2020/21**
Number of permissions with car, motorcycle, cycle and disabled parking provision in development	X	X	9	12
Area of permanent and temporary car parking gained	0.95ha	0		

Table 7 Transport development and electronic communications				
Indicator	**2017/18**	**2018/19**	**2019/20**	**2020/21**
Area of permanent and temporary car parking lost	0	0		
Number of applications permitted with Transport Assessment/Statement, Travel Plan or AQA	X	X	1	1
Number of new masts permitted	9	1	1	5