

Exmoor National Park Local Plan Five Year Policy Review

Statement of Common Ground

1. Introduction

- 1.1. This Statement of Common Ground (SCG) is a jointly agreed statement between Somerset West and Taunton Council (SWT) and Exmoor National Park Authority (ENPA). The Exmoor National Park Local Plan was adopted in July 2017, and the Authority is conducting a five year review to assess whether the policies need updating, in accordance with the National Planning Policy Framework.
- 1.2. The SCG sets out the position and understanding with respect to the strategic cross-boundary matters relating to the review including housing, climate change, nature recovery, and economic development. It is not binding on either party, but sets out a clear and positive direction, at a particular time, to inform decisions on the five year review of the Exmoor National Park Local Plan.
- 1.3. The purpose of this SCG is to demonstrate clearly and concisely how matters raised by SWT in relation to the review have been positively explored and, where applicable, resolved.

2. Parties involved

- 2.1. The following local planning authorities have engaged in this SCG:
 - Exmoor National Park Authority
 - Somerset West and Taunton Council

3. Signatories

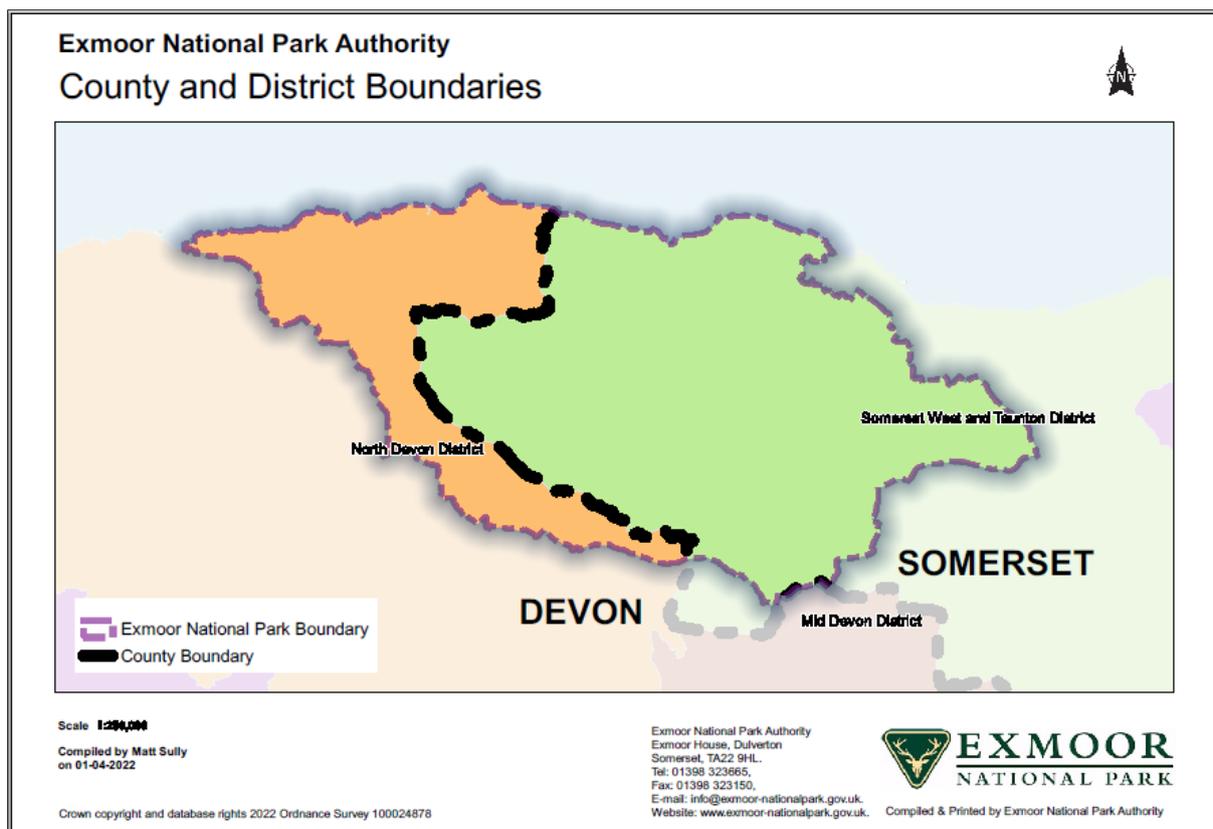
Clare Reid, Head of Strategy and Performance, for Exmoor National Park Authority

Councillor Mike Rigby, Portfolio Holder for Planning and Transportation, for Somerset West and Taunton Council

4. Strategic geography

- 4.1. This SCG covers the Somerset West and Taunton area within Exmoor National Park Authority. As illustrated from the map below (Fig.1), Exmoor National Park Authority (ENPA) is partly within the Somerset West and Taunton Council area, and partly within North Devon District Council area. Exmoor National Park Authority is the sole local planning authority for the National Park and responsible for reviewing the Local Plan.
- 4.2. Section 62 of the Environment Act 1995 requires all relevant authorities, including local authorities such as SWT, to have regard to the purposes of National Parks. These are:
- To conserve and enhance the natural beauty, wildlife and cultural heritage of the area;
 - To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

Figure 1: Map showing Exmoor National Park with County and District boundaries



5. Background

5.1. In undertaking the review of Local Plan policies, ENPA has followed national requirements set out in the NPPF (para 33) and guidance, including the Planning Advisory Service toolkit¹.

Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future. (NPPF para 33)

5.2. In line with legal and national requirements and guidance, ENPA carried out an initial review of the Local Plan, including:

- Assessment of changes in national policy and if the Local Plan is still policy compliant
- Monitoring the effectiveness of the current policies
- Preparing new and updated evidence including on local affordable housing need
- Reviewing housing delivery as required by Local Plan Policy M1-S1 and identifying whether external factors such as economic changes have impacted the viability of housing delivery
- Considering ENPA's appeals performance and whether this suggests specific policies need to be reviewed where appeals are being lost
- Exploring whether any new social, environmental or economic priorities may have arisen
- Engaging with neighbouring authorities and other relevant statutory / partner organisations as part of the Duty to Co-operate to consider cross-boundary issues and other strategic priorities
- Considering the implications of changes to the planning system including those set out in the Government's Planning White Paper 'Planning for the Future'².

¹ [**Updated NPPF 2021** Local Plan Route Mapper & Toolkit - reviewing and updating local plan policies | Local Government Association](#)

² [Planning for the future \(publishing.service.gov.uk\)](#)

- 5.3. A Duty to Co-operate meeting was held with SWT and other partners on 21 September 2021. The notes of this meeting were subsequently agreed with officers and are given at **Appendix 1**, and relevant extracts included in the strategic matters in section 6 below. **No significant issues with the adopted Local Plan policies were identified at the meeting.**
- 5.4. Having completed the initial assessments for the review, ENPA produced a series of topic papers setting out the interim conclusions of the five year check of Local Plan policies.³ These were discussed at a workshop for partners on 2 December 2021 which SWT officers attended. A summary of the points raised at the workshop is given at **Appendix 2**.
- 5.5. The topic papers also provided background information for responses to the online survey held in early 2022 which SWT officers also responded to. The extract of SWT's survey comments and ENPA's response are included in the strategic matters in **section 6 below**. **No significant issues with the adopted Local Plan policies were identified from the survey.**

6. Strategic matters

- 6.1. The main issues raised by SWT in relation to the five year review were:
- *Housing distribution and mix, and phosphates*
 - *Nature recovery and climate change*
 - *Economic development / employment sites*

Housing and phosphates

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

³ [Exmoor - Local Plan 5-Year Review Survey \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk)

6.3. The Local Plan does not include a target for housing: national policy is that National Parks have the highest status of protection and that the scale and extent of development should be limited.⁴ The focus for housing delivery in National Parks is on affordable housing and Local Plans should respond to local housing needs and prioritise local need affordable housing.⁵ The Exmoor National Park Local Plan therefore includes an *indicative* figure for local affordable housing of 238 dwellings over the plan period (an average of 12 affordable dwellings a year). This covers the Somerset side of the National Park as housing needs in the Devon side are included in the North Devon and Torridge Joint Local Plan. Updated evidence prepared for the review gave an updated affordable housing need of 126 dwellings (11 dwellings per annum) for the remaining plan period 2020 to 2031. The updated affordable housing need figure for the whole plan period of 2011-31 also decreased from 238 to 194 dwellings or nearly 10 affordable housing units per year. **Importantly for this review process, the updated evidence for the Local Plan indicative affordable housing need figure does not trigger a Local Plan review.**

6.4. The Duty to Co-operate meeting included updates on Local Plans in adjoining Districts and Exmoor National Park including the current situation regarding housing delivery. **No significant issues with the adopted Local Plan housing policies were identified at the meeting.**

6.5. The meeting noted the following points to be taken forward as a helpful basis for future discussions:

- *Ongoing collaboration over updated evidence base and methodology for assessing housing need. A joint methodology for assessing availability of housing and employment sites, to ensure a consistent approach* ENPA inputted to the update of the SWT local housing need assessment⁶ and SWT inputted to work commissioned by ENPA to update evidence and review the Local Plan affordable housing need figure.⁷ The same methodology was used, to provide a consistent basis for identifying the size, type and tenure of homes that will be needed in the future, and the housing needs of different groups, including affordable housing. The

⁴ National Planning Policy Framework (July 2021) paragraph 176
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

⁵ DEFRA, English National Parks and the Broads UK Government Vision and Circular 2010
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/221086/pb13387-vision-circular2010.pdf, para 78.

⁶ [SWT Local Housing Needs Assessment Aug 2021 \(somersetwestandtaunton.gov.uk\)](https://www.somerssetwestandtaunton.gov.uk)

⁷ [2021-11-29-FINAL-ORS-Exmoor-NPA-Ind-LHNA.pdf \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk)

updated evidence for the Local Plan indicative affordable housing need figure does not trigger a Local Plan review.

- *Future joint work through duty to co-operate to consider the need for inclusion of National Park housing needs in other plan housing requirements.*

This has been raised as an issue that will need to be considered as part of future plan-making. Work has not progressed due to the creation of the new Somerset Unitary Authority (which will come into being in April 2023), which has meant that work on the Somerset West and Taunton Local Plan has been halted, although work is still being carried out to provide information and evidence to feed into the new Unitary Authority Local Plan work.

- *The impact of phosphates on European designated nature sites in Somerset.*

This is currently restricting housing development in areas outside the National Park, but it is not anticipated to have a significant impact on Exmoor due to the very small and rural area of open countryside in the National Park which falls within the Tone catchment. For this reason, officers have concluded that it is not likely to trigger a review of the Exmoor National Park Local Plan. This issue has been regularly discussed at Somerset Strategic Planning Officer meetings, which ENPA attends. The completion of a phosphates strategy is awaited and, in the meantime, ENPA will continue to be kept informed on this issue including on the precise boundary of the Tone catchment within Exmoor National Park.

- *Provision for Gypsy and Traveller accommodation.*

Currently there is no identified need for sites on Exmoor, but the Authority will continue to work with the Districts on an updated evidence base for this.

6.6. ENPA also received two officer responses to the online survey seeking views on the interim conclusions of the Local Plan review. The comments received on Question 10 and ENPA's response are set out in **Appendix 3**.

Nature recovery and climate change

6.7. The Exmoor National Park Local Plan has policies to conserve and enhance the environment, and to respond to climate change. The interim conclusions of the review set out in the Environment Topic Paper indicated that **there is no need to review the environment policies**. The paper highlighted that the climate change policies could be strengthened in the light of the climate emergency declaration, and that additional guidance is needed to support implementation

of the new national Biodiversity Net Gain (BNG) requirements introduced by the Environment Act.

6.8. Both ENPA and SWT have declared climate emergencies, and are collaborating on the response to climate change including via the Somerset Climate Change Strategy. Councils across Somerset are also collaborating on the implementation of BNG. The Duty to Co-operate meeting included updates regarding nature recovery, climate change and on work to prepare for the introduction of BNG. **No significant issues with the adopted Local Plan environment policies were identified at the meeting.**

6.9. The meeting noted the following points to be taken forward as a helpful basis for future discussions:

- *Nature recovery / local nature recovery strategies and opportunities for cross-boundary collaboration, potentially around biodiversity net gain and natural flood management*

SWT are working on a strategy and action plan for responding to the declaration of an Ecological Emergency. ENPA adopted the ENP Nature Recovery Vision in November 2020 which aims to increase the area for nature via targets to 2030 and 2050.

SWT and ENP Local Plans both have policies which provide a hook that can be used to seek biodiversity net gain. ENPA and SWT are keen to pursue a common position on how BNG can be secured in advance of the Environment Act requirements coming into force. Further joint work is required including on the potential merit of focusing off-site BNG towards locations within the National Park, which will likely need to emerge via the Local Nature Recovery Strategy.

ENPA and SWT have collaborated on a joint Somerset response to the BNG consultation. ENPA is proposing to undertake further work on BNG and is likely to produce a Supplementary Planning Document and will engage with SWT on this through Duty to Co-operate and wider officer discussions.

- *Climate response and opportunities to work collaboratively on actions such as electric vehicle charge points, design guides and energy plans (including renewable energy)*

SWT have produced a guidance note on Climate Positive Planning in relation to how the climate emergency is addressed in existing planning policies and will influence decision making as a material consideration. It requires submission of a Climate Emergency Checklist to help demonstrate how applicants have considered and are responding to key aspects in relation to the Climate Emergency

SWT and ENPA collaborated on the joint Somerset Electric Vehicle Charging Strategy.

SWT adopted a District-wide Design Guide SPD in December 2021 which includes design processes to address climate change working towards zero-carbon. ENPA is also preparing a Design SPD and will engage with SWT on this through Duty to Co-operate and wider officer discussions.

SWT is keen to move forward with a renewable energy study to provide a planning evidence base for future renewables energy policy development and allocations/areas of search. The ENP Local Plan contains criteria-based policies for small-scale wind and solar energy, underpinned by evidence using on a landscape character approach and identifies suitable areas. Further work to explore opportunities for renewable energy across the District would be welcome but would need to take into account potential impacts on the National Park including its setting and views from or into the National Park. This work is currently stalled, due to cost and also the establishment of the new Somerset Unitary Authority.

- *Flood and coastal risk management and increasing impacts due to climate change*

The Districts are considering fluvial change management areas with the aim of slowing floodwater, with the potential for sites upstream to be identified (including in the National Park) and then funded by housing development in settlements. It was agreed that that it would be beneficial to work on an agreed approach of how to identify and fund them.

- *Minerals development, particularly the need for local stone*
Sources of local building stone are limited and there are no working quarries in ENP although the Local Plan has policies to enable small scale quarries for building stone as this would benefit local distinctiveness.
- *Sustainable development, 'building back beautiful' and local character*
The SWT and ENPA Design Guide SPDs will support the Government's aspirations for 'building back beautiful', and local character.
- *Dark Skies and Setting of Exmoor National Park*
Exmoor National Park is designated as a Dark Skies Reserve and the Local Plan includes policies to protect the reserve core area and buffer zone from light pollution. Joint working on lighting design would be helpful for developments outside the National Park which might affect the Reserve. A Dark Sky Management Plan would help to achieve better outcomes in

terms of lighting design and impacts - whether through planning applications or through lighting through permitted development. There is also a need to reduce the impact of lighting for roads and signage and joint working with the counties could assist in minimising impacts from lighting on A roads near the National Park.

6.10. ENPA ran an online survey in January-February 2022 to gather views on the interim conclusions from the Local Plan review. SWT officers submitted a response to the survey. The comments and ENPA's response are given in **Appendix 3**.

Economic development / employment sites

6.11. The Exmoor National Park Local Plan policies cover a range of development from business and agricultural and forestry to recreation and tourism, transport and telecommunications development. National policy is that the scale and extent of development within National Parks should be limited. The rural economy on Exmoor is characterised by small businesses. Recent research carried out by ENPA⁸ into 'Rural Enterprise Exmoor' revealed a 60% increase in the number of businesses than had previously been identified through national data sets. The majority of businesses are micro-businesses with under ten employees, with over a third based from home, and double the UK average of self-employment.

6.12. The Duty to Co-operate meeting included updates on Local Plans in adjoining Districts and Exmoor National Park including the current situation regarding housing delivery. **No significant issues with the adopted Local Plan economy policies were identified at the meeting.**

6.13. In July 2021 SWT consulted ENPA, at an early stage, on a number of potential employment sites being considered by SWT around Minehead including a site within the National Park. Following the Duty to Co-operate meeting held on 27 September 2021, SWT raised, via an email of 28th September, the issue of employment sites near Minehead. As a site being considered is in the National Park, and the land between Minehead and Dunster is open countryside, a question was asked about whether this matter in principle is something that needs to be reviewed. SWT then also raised the matter via the online survey in early 2022. SWT comments on the survey are set out in **Appendix 3**. ENPA has separately provided comments to SWT on these sites, including on landscape impacts from development between Minehead and Dunster- both within the National Park and in its setting, and will seek ongoing involvement in sites being considered.

⁸ <https://www.exmoor-nationalpark.gov.uk/living-and-working/business-and-economy/rural-enterprise-exmoor-research>

6.14. A number of areas relating to future work and updating of evidence were identified which will form the basis for ongoing future discussions:

- *Rural Enterprise Exmoor work and vision, the effects of Covid restrictions on businesses, the post-Covid economic recovery plan*

ENPA and SWT collaborated on research to improve understanding of the businesses on Exmoor and issues affecting them, through Rural Enterprise Exmoor, and a joint vision was agreed for the ENP economy, connectivity, digital connectivity and communities.

ENPA and SWT worked together on a Covid Tourism Recovery and Response Plan⁹.

- *Infrastructure and digital connectivity*

No issues were identified relating to water supply and treatment, minerals and waste, or transport. Education provision within the National Park was discussed and further updates are awaited regarding a potential education hub in Dulverton, and educational requirements from developments.

Conclusions

6.15. SWT and ENPA will continue to work together on joint evidence, preparation of further guidance on a number of topics, and will continue to liaise over delivery issues including phosphates, employment sites and education contributions.

There are no outstanding Duty to Co-operate issues suggesting that a review of the Exmoor National Park Local Plan is required.

7. Governance arrangements

7.1. This SCG has been signed by the Planning and Transportation Portfolio Holder for SWT and the Head of Strategy and Performance on behalf of Exmoor National Park Authority.

8. Timetable for review and ongoing cooperation

8.1 The strategic issues identified in this SCG (housing and phosphates, nature recovery and climate change, and economic development / employment sites) will be managed on an ongoing basis.

⁹ [Exmoor-Covid-19-Tourism-Recovery-Plan-V3.1-updated-18032021.pdf \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk/exmoor-covid-19-tourism-recovery-plan-v3.1-updated-18032021.pdf)

8.2 Future Duty to Co-operate meetings will enable progress to be shared and communicated and any further actions to be identified.

<i>Signed on behalf of Somerset West and Taunton Council:</i> 	<i>Signed on behalf of Exmoor National Park Authority:</i> 
<i>Position: Portfolio Holder for Planning and Transportation</i>	<i>Position: Head of Strategy and Performance</i>
<i>Date: 9 May 2022</i>	<i>Date: 31st May 2022</i>

Appendix 1 - Notes of Duty to Co-operate Meeting

Exmoor National Park 5-Year Local Plan Review

Minutes of the Duty to Co-operate Officer Meeting

27 September 2021 1.30– 4.00pm

(Teams meeting)

Present:
Exmoor National Park Authority (ENPA): Ruth McArthur (RM); Robert Paddison (RP) Clare Reid (CR)
Devon County Council (DCC) Emily Harper (EH)
North Devon Council (NDC): Andrew Austen (AA);
Somerset County Council (SCC) Andrew Gunn (AG)
Somerset West and Taunton (SWT) Paul Browning (PB); Laura Higgins (LH); Kate Murdoch (KM), Ann Rhodes (AR), Graeme Thompson (GT)

Item	Action
<p>Plans Update</p> <p>NDC –North Devon & Torridge Local Plan was adopted in 2018. Members have decided to review the plan, including to address the climate and biodiversity emergencies. It is likely to be a full review and will be a joint local plan with Torridge.</p> <p>(LH provided an update on SWT plan making. Following the decision on a Somerset unitary authority, there will now be a joint Somerset Local Plan rather than a new SWT Local Plan. The team is working on evidence gathering such as site assessments but are mindful of the need to ensure studies will be relevant. The local housing need assessment is being updated (ORS) - this has involved working with Exmoor NPA.</p> <p>DCC adopted the Waste Local Plan in 2014. A 5-year review concluded policies are up to date. The 2017 Minerals Local Plan is due to be reviewed.</p>	

Item	Action
<p>previously the potential merit of focusing off-site net gain towards locations within the National Park, but more work was needed and approach will likely need to emerge via the Local Nature Recovery Strategy.</p> <p>SWT (PB) provided an update on phosphates, following the Natural England advice note in August 2020 that all new development, including residential, has to be phosphate neutral. A phosphates calculator is complete. Consultants are establishing the area of risk (including in the National Park) and producing a strategy to manage the impact of development. It is hoped these will be available in October / November. There will also be strategies for each river catchment and a County-wide SPD.</p> <p>113 planning applications are currently stalled - there may be interim measures to allow some development. National concerns are about river water quality. To date, river quality has not been included as part of biodiversity net gain.</p> <p>Solutions may not allow sufficient housing to meet the housing requirement and there is a need to invest in sewage treatment works. Funding has been requested from the government. OFFWAT are being asked to consider environmental as well as economic matters.</p> <p>ENPA asked if there are solutions in the strategy which affect the National Park. PB responded that the best / most cost-effective solution is wetland, but there may need to be safeguarded strips near water courses. The issue is also a function of geology and soil types. Water saving measures in existing council-owned housing stock may enable the release of 750 - 1350 dwellings. ENPA noted that there appear to be no details for the National Park to take note of at the moment.</p> <p>Devon Nature Recovery Strategy, Biodiversity Net Gain SPD, Biosphere Nature Recovery Plan and Use of Building with Nature Standards</p> <p>NDC – The Biosphere Nature Partnership has prepared and consulted on a nature recovery plan - it is not yet a formally</p>	<p>ENPA to await release of the phosphates strategy and keep engaged on the issue. ENPA to await the nature recovery and biodiversity net gain strategies.</p>

Item	Action
<p>adopted SPD. It contains a requirement to use Building with Nature Standards. Subject to member agreement, this may be adopted by N Devon & Torridge in a new Local Plan. It is not a consideration for DtC yet, it may form part of future DtC discussions including as part of any future ENP Local Plan review.</p> <p>SWT (GT) – In Somerset, SWT are will soon be working on a strategy and action plan for responding to the declaration of an Ecological Emergency. Climate Positive Planning has been produced as a guidance note in relation to how the climate emergency is addressed in existing planning policies and will influence decision making as a material consideration. It requires submission of a Climate Emergency Checklist to help demonstrate how applicants have considered and are responding to key aspects in relation to the Climate Emergency including in relation to Biodiversity Net Gain. Local Plan policy provides a hook which can be used, informally, to seek biodiversity net gain. The next iteration of Climate Positive Planning will include improved focus on this issue.</p> <p>ENPA – The Authority adopted the ENP Nature Recovery Vision in November 2020 which aims to increase the area dedicated to nature via targets to 2030 and 2050. This will potentially provide multiple public benefits and a starting point for Farming in Protected Landscapes (FiPL) / conversations with stakeholders. The Vision will feed into Biodiversity Net Gain.</p> <p>SWT (GT) – Officers are seeking an ecologist assessment to help with a response to the nature emergency. The contact is Sue Tomlinson.</p>	<p>ENPA to circulate link to the ENP Nature Recovery Vision once available.</p> <p>ENPA to continue to work with Somerset on the nature emergency.</p>
<p>Climate change mitigation and adaptation</p> <p>Implications of new July 21 NPPF changes</p> <ul style="list-style-type: none"> - Design Codes, building beautiful, building in stone 	

Item	Action
<p>GT said that a District-wide Design Guide SPD will be adopted in December and include design processes to address climate change working towards zero-carbon as well as aspirational building standards beyond building regulations linked to the LETI standards. SWT have procured a district-specific quality review panel and set out in the District-wide Design Guide SPD when new developments should be considered by it.</p> <p>The phosphates issue is stalling applications so it is not clear how successful this approach is being/will be as yet.</p> <p>SCC – In terms of ‘beauty/beautiful design and the use of natural stone, AG asked if there a problem sourcing building stone locally as there are no working quarries in ENP. Rm responded that local stone types vary across the National Park. Development tends to be rendered and also because cost is often an issue. It would be beneficial for local distinctiveness to have sources of local stone. Farmers can win their own stone. There is a small quarry to the north -east outside but close to the National Park.</p> <p>DCC – The Minerals Plan is supportive of local building stone. There are not many quarries for building stone in Devon.</p> <p>NDC –Quarries in North Devon are mainly for aggregates; there are no building stone quarries.</p>	
<p>Potential areas of search for wind energy (incl. offshore renewables)</p> <p>NDC – Areas of search in North Devon were seen as politically controversial and none were identified in the district. The new Local Plan may take a different approach and may identify areas of search. This would take into account the effect on the National Park, and would be discussed with the NPA. There will be land based areas of search in N Devon - landscape sensitivity mapping will need to be completed.</p> <p>ENPA The ENP Local Plan contains a criteria-based wind energy policy underpinned by evidence using on a landscape character approach which identified areas considered as unsuitable for turbines (the remaining as suitable).</p> <p>SWT (GT) SWT is keen to move forward with a renewable energy study to provide a planning evidence base for future renewables</p>	<p>NDC to discuss areas of search for wind energy in North Devon with the NPA as part of the North Devon / Torridge Local Plan review</p>

Item	Action
<p>energy policy development and allocations/areas of search. In conversations with all the Somerset authorities in relation to taking this forward, but currently stalled, primarily due to the impasse on Local Plan development caused by Unitary amongst other things.-In terms of wind, West Somerset has similar problems as N Devon. Somerset has fewer opportunities for wind turbines though tidal power may be an option. GT asked whether there would be ENPA interest in jointly producing a consultants brief on the topic.</p> <p>ENPA noted that impacts on the coast and seascape and the infrastructure associated with tidal power were matters ENPA have raised in consultations - the South-West Marine Plan contains enabling renewable energy policies. ENPA would keep in contact with Somerset as the study develops. PB said a test for offshore renewables was views from the top of the Quantocks.</p> <p>Retrofit impacts</p> <p>CR explained that retrofit impacts (for more sustainable energy use and generation) are difficult in the National Park particularly on / near Listed Buildings and in / near Conservation Areas. Would there be opportunities to work jointly on this issue. GT suggested SWT is in the process of adapting the Net Zero Carbon Toolkit published by Cotswold, West Oxfordshire and Forest of Deane Councils and this includes a focus on providing guidance for best practice in retrofit. AA considered it was positive to use best practice and work across counties. It was agreed that it was useful if all LPAs were encouraging the same thing.</p> <p>Natural Flood Management opportunities</p> <p>Flood resilience (Flood and Coastal Resilience Innovation Programme)</p> <p>NDC is considering fluvial change management areas with the aim of slowing floodwater and whether sites upstream could be identified and then funded by housing development in towns. It could potentially include sites in the National Park (may need a specific proposal and location for the mitigation). Considerations</p>	<p>All – keep in touch on fluvial change management thinking / funding</p>

Item	Action
<p>could also include other climate change impacts e.g. drought and dry rivers.</p> <p>AR said SWT are interested in fluvial change management areas. S106 money could fund it. GT suggested there are other benefits in addition to flood relief - it would be beneficial to work on an agreed approach of how to fund them.</p>	
<p>Economy</p> <p>Post Covid Impacts and recovery</p> <p>ENPA– Dan James has developed a post Covid economic recovery plan. ENPA has also worked with consultants and stakeholders through Rural Enterprise Exmoor (REE) looking at businesses on Exmoor National Park; this work has identified many micro businesses which did not previously appear in statistics. A REE Vision has been adopted and is ready for launch, it has a broad vision of the ENP economy, connectivity, digital connectivity and communities.</p> <p>SCC carried out a survey into the effect of Covid which has had little impact on quarry operators, although import of machinery has been an issue. HS2 and Hinckley have created strong demand for minerals in Somerset.</p> <p>ENPA People visited the countryside more during Covid lock down. Overall, the number of visitors was slightly down. Visitor locations changed with increased visits to the open countryside and fewer to Exmoor’s settlements. Changes to permitted development allowed more campsites. The lack of staff, e.g. chefs has caused difficulties for businesses.</p> <p>SWT (GT) – The Economic Development Strategy Innovation District based on natural capital and clean energy are central themes - Mark Wathen is the contact.</p>	
<p>Infrastructure</p> <p>Water supply</p> <p>AA asked whether, with drier summers and stormy wetter winters whether there is a need for new or expanded reservoirs</p> <p>Waste Water Treatment</p> <p>Oil and Gas MoU (Somerset)</p>	

Item	Action
<p>Waste and Mineral Site safeguarding AG (SCC) highlighted that wastewater; oil and gas and minerals safeguarding were issues for districts and the NPA to give consideration to. There were no other issues currently. SWT members voted to oppose fracking in the district.</p> <p>Transport including Car Charging etc New Hospital in Devon AA updated the meeting: the North Devon link road is being upgraded. At North Devon Hospital in Barnstaple, a new hospital is replacing existing buildings on site.</p> <p>DCC had nothing specific to raise on roads or minerals and waste [see email update dated 29/09/2021 set out below)</p> <p>Education PB raised educational attainment for ENP residents who have to travel outside the National Park to e.g. Taunton. SWT (KM) noted that the County were considering a project in Minehead to improve access to higher education. There have also been discussions on a remote hub at Dulverton school.</p> <p>Existing school requirements Two schools are situated within Exmoor (Lynton & Parracombe), with Kentisbury, Combe Martin and East Anstey close. These are small rural schools with very low cohorts/demographics. There are no plans to expands these schools.</p> <p>CIL ENPA had questions on:</p> <ul style="list-style-type: none"> - whether DCC have double contributions (CIL and S106) for major schemes, - If Councils are still using CIL (the pooling limit has been lifted). DCC sent information on CIL and education contributions after the meeting (see below). <p>SWT (KM) – View was that the CIL system should be retained as is. The County are seeking educational charges on top of CIL and phosphate costs – this has implications for site viability. PB explained that Somerset have not determined any major applications for 12 months. Phosphate will have first charge on</p>	<p>SCC to investigate what is happening with the hub?</p>

Item	Action
<p>viability with a knock-on effect on other demands such as affordable housing and infrastructure. The most likely impact will be on sites which have agreed land deals which do not take account of phosphates.</p> <p>Following the meeting DCC provided the following information on education contributions through S106s:</p> <p><u>S106 approach</u></p> <p>DCC's current approach to education contributions is set out in the February 2020 document: PDF S106 Approach February 2020.pdf</p> <p>An update is due to be presented at Devon Planning Officers Group in October 2021. The main changes include:</p> <ul style="list-style-type: none"> - An increase in build costs in line with the DfE scorecards (for example, 2020 cost per place for a primary extension = £16,432, the new cost is £17,097). It also increases the % of pupils requiring specific SEN provision from 1.5% to 2%. - Confirming the way contributions are requested in CIL charging areas, DCC is requesting S106 from development where CIL has been adopted and the CIL programme does not include funding for specific education infrastructure or there is no approved programme. S106 contributions will also be requested where the commitment from the district council is not sufficient to meet the full need arising from the development. Clarification that school transport requests are managed through the S106 process rather than CIL as school transport is not considered to be education infrastructure in the same context as school buildings. - A differentiation in establishing existing capacity in urban areas (the rural approach, which Exmoor is subject to, remains the same). 	<p>SCC (AG) and DCC (EH) agreed to provide updates in relation to schools on Exmoor</p>
<p>Habitats Regulations Assessments</p> <ul style="list-style-type: none"> - Cumulative impacts on Habitats Regs Assessment 	

Item	Action
<p>NDC had no current issues, but HRA will need to be discussed as a part of duty to co-operate in the future.</p>	
<p>Dark Skies and Setting of Exmoor National Park</p> <p>ENPA asked whether lighting guidance can be discussed with councils. Joint working on lighting design would be helpful as well as the need for a Dark Sky Management Plan. New guidance on lighting design has been produced by the UK Dark Skies Partnership and it will be available on the NPA web site - it is not an SPD. It is hoped the guidance will achieve better outcomes in terms of lighting design and impacts - whether through planning applications or through lighting through permitted development. SWT. There is also a need to reduce the impact of signage and joint working with the counties PB said lighting on, for example, A roads near the National Park should be directed downwards. SCC said a Somerset District had received expert advice on improvement of lighting.</p> <p>AA would welcome working with the ENPA on guidance for developments outside the National Park, but which might affect it – NDC would share the draft approach with ENPA.</p> <p>The meeting closed at 4pm</p>	

Exmoor National Park Local Plan 5 Year Review

STAKEHOLDER WORKSHOP

2nd December 2021

Summary notes

Housing and Communities

(Including housing delivery, local housing, community facilities)

<u>Housing</u>	<u>Community</u>
<ul style="list-style-type: none"> • Delivery of affordable housing – need to establish whether it is a policy issue • Affordable housing viability. Cross-subsidy as an option to deliver more affordable housing • No unrestricted market homes - become second and holiday homes • Definition of ‘affordable’ thought to help some people – on lowest incomes- but not others • Local housing - employees of local businesses / local workers with a local but not local affordable need tie e.g. as in Yorkshire Dales • Local connection criteria too stringent. Should include workers (in addition to agricultural and forestry or jobs benefiting the National Park) e.g. contributing to local economy • ENPA needs to look at interpretation of the current Local Plan • Local connection criteria and bordering parishes - Brushford • Lack of staff accommodation • Maximum floor space of 93m² too small e.g. for self-builds. Why does it apply to conversions? Different size limits on owner occupied compared to Registered Provider controlled housing. Larger housing to move to 	<ul style="list-style-type: none"> • Ageing and declining population and the impact on local community services and economy • Example of Community Land Trust shop underway at Parracombe • Other community shops set up, e.g., Exford, Winsford • Concern over Winsford pub no longer accepting customers unless booking for a meal

Housing cont.

- Policies are good and progress is being made – patience is needed as development is a long process
- Affordable self-builds permitted through the Local Plan - policy is working. Other factors may be affecting delivery
- Non-policy related issues raised include:
 - The loss of the Rural Housing Enabler – now reinstated (in Somerset part of ENP) things seems to be happening - hoped will lead to development
 - Loss of affordable housing grants for Registered Providers (RPs) - recently reinstated
 - difficulties with Homefinder - does not reflect all local housing need
 - RPs and scale of sites
 - Concern over second / holiday homes(19.4% in 2011) and shortage of rented housing compared to holiday lets
 - High cost of living on Exmoor
 - Potential to look at managed (custom) build options
 - Opportunities for landowners to release land for affordable housing as lower agricultural values on Exmoor

Environment

(including biodiversity net gain, climate change, design)

Climate Change

- Does climate change have sufficient prominence in Local Plan, should it guide all other policies
- Important to link nature and climate crises, allowing space for nature
- Links between where people live and work, to reduce the need to travel
- Need to retrofit existing housing stock
- Place greater emphasis on retaining historic/traditional buildings for embodied energy

Biodiversity Net Gain

- Support for further guidance /SPD to provide clarity to applicants
- Standard calculator has limitations – useful for NP to develop own tool/metric
- Positive contribution to historic environment too
- NP should go beyond minimum, set net gain at 20% and longer than 30 year commitment for habitat
- Opportunity for off-site BNG to provide a new income stream for farmers, this should include those who have already done a lot for biodiversity
- Important to ensure that off-site BNG is credible

Renewable Energy

- Strengthen current LP wording so that development must demonstrate how it will use low carbon and renewable energy, not just 'have regard to'
- Opportunity for more locally generated power, especially hydro
- More flexibility on renewables and listed buildings / Conservation Areas
- Need the enabling infrastructure for renewable energy
- Support for community renewable energy (even if large scale)

Design

- Revision of design guide welcomed
- Too much concern over preservation rather than adapting and changing
- New guide needs to include modern design not just traditional
- Design requirements can make housing unaffordable
- Build nature into design as part of buildings
- Look at LP requirements for materials, particularly for windows

Economy

(including farming, tourism and diversification, digital communications)

Farming and Land Based Economy

- There will be many changes to farming over the next 18 months and beyond which may impact on viability
- Some people felt Intensive farming is not supported by policy
- Others suggested it may not be the policies but getting used to using them
- Farming activities are supported by other micro business which need to be in the park.
- May need to find land for them
- Farms may need to be bigger to survive

Diversification and Tourism

- Current Policies may be too restrictive and need change
- Agricultural ties for housing may prevent diversification
- Farms may have tried tourism, but this may not suit them
- Are tourism impacts too great?
- Need to diversify to other industries
- Concern over attaching greater weight to the environment than food production
- Policies generally get balance right between diversification and the environment

Digital Communications

- Series of well known problems, poor signal and coverage, poor internet, patchy good areas
- Loss of copper phone service in 2025
- Masts still needed at the moment
- Technology may change e.g. cable or fibre
- Vital for successful businesses
- Need to know what the strategy is to roll out improvements

Other Businesses

- Micro businesses may not provide high paid skilled jobs
- Need allocations to help this or allow more farm diversification
- On Farm holdings; farming may become less important than these other income streams; a subsidiary business?

List of Participants

Carl Beneyworth	Heart of the South West LEP
Sarah Buchanan	Clerk, Brompton Regis Parish Council
Matthew Byrne	Community Council for Somerset
Charles Carter	North Devon District Council (Housing)
Ian Cowling	Lynton & Barnstaple Railway Trust
Donna Crabtree	National Trust
Elizabeth Dee	North Devon District Council (Planning)
Christine Dubery	Chair, Dulverton Town Council
Chris Edwards	Quantock Hills AONB
Mike Ellicott	Chair, Exford Parish Council (and ENPA Member)
Victoria Eveleigh	West Ilkerton Farm (and Exmoor Society Trustee)
Louise Flagg	CVS Health Promotion Group
Philip Griffin	Wootton Courtenay Parish Council
Victoria Hancock	Torrige District Council (Planning)
Rebecca Harfield	Historic England
Harry Harrison	Individual
Jeremy Holtom	Chair, Parracombe Parish Council (and ENPA Member)
Tim Jones	Individual/South West Business Council
Mike Kelly	ENPA Member
Frances Nicholson	ENPA Member (and Somerset County Councillor)
Ed Parr-Ferris	Devon Wildlife Trust
Angela Percival	Vice Chair, Brendon & Countisbury Parish Council
Steven Pugsley	ENPA Member, Chair of Planning (and Somerset West and Taunton District Councillor)
Mark Sanders (with Brian Dinnis & Isabella Pine)	Acorn Rural Property Consultants
Anne-Marie Spalding	Western Somerset & Somerset Levels & Moors LEADER Heart of the South West Local Enterprise Partnership, Somerset West and Taunton District Council (Housing)
Sue Southwell	
Roger Webber	Individual
Vivian White	Chair, Cutcombe Parish Council (and ENPA Member)
Colin Wilkins	Chair, Winsford Parish Council
Claire Wright	CLA Devon and Somerset

ENPA officers

Clare Reid, Ruth McArthur, Becky Wroe, Hazel Malcolm, Dean Kinsella, Robert Paddison, Ellie Woodcock, Sarah Bryan

Appendix 3 - Somerset West & Taunton responses to the ENP Local Plan 5 Year Review online survey

Responses from Somerset West and Taunton Council were received from Nicola Kemp, (Housing Enabling Team) and James Holbrook

Housing

Question 10: Our analysis to date (in the summary paper and interim housing and community topic paper) suggests that although fewer homes have been delivered than expected, there are other factors outside the planning system impacting on the delivery of sufficient affordable housing for local people. As such, changes are not needed to the housing policies to enable the delivery of local need homes. To what extent do you agree or disagree with this statement?

Name/Organisation	Response	Comments	ENPA Response
Nicola Kemp, Somerset West and Taunton	Strongly agree	Strong pipeline with number of potential sites in pre-planning system and growing awareness and interest locally in affordable housing. Rural Housing Enabler has been in post for 15 months of 5 year programme that will continue to support progress. Significant progress has been seen during last 15 months.	Noted. The RHE post plays a vital role in supporting delivery of affordable housing on Exmoor working with the National Park Authority as the local planning authority and other partners to bring forward locally needed affordable housing.
James Holbrook/ Somerset West and Taunton	Disagree	<p>Since the adoption of the Local Plan, Exmoor National Park has declared a climate emergency. The importance of Biodiversity Net Gain needs to be considered as this will have an impact on any proposed residential development coming forward and being developed in the National Park.</p> <p>In addition, the topic papers refer to the Phosphates issues currently impacting planning applications in Somerset West and Taunton and the Somerset Levels and the topic paper states that it is not "anticipated" that phosphates will impact upon Exmoor National Park.</p>	<p>The ENP Local Plan includes policies to conserve <i>and enhance</i> biodiversity. This provides a policy hook to implement BNG, which as national legislation and policy, does not need to be repeated in Local Plan policies. ENPA will prepare further guidance on BNG to provide further guidance on how to implement the requirements within the National Park.</p> <p>The situation regarding phosphates and the impact on housing delivery in Somerset has been identified through Duty to Co-operate discussions and will be kept under review. (see paras 6.3-6.5 in the SoCG above).</p>

Name/Organisation	Response	Comments	ENPA Response
		<p>Whilst, it is agreed that it might not directly, it could indirectly if Somerset West and Taunton were unable to support Exmoor National Park in meeting their housing need due to the lack of a phosphates solution in our area. Options and solutions are being considered but in the short term, there may be additional pressure from developers looking outside of the areas impacted by the phosphates issue.</p>	<p>The adopted ENP Local Plan housing strategy furthers statutory National Park purposes and the National Park Authority duty to local communities and is in line with national policy which is that National Parks have the highest status of protection and that the scale and extent of development should be limited.¹⁰ The focus for housing delivery in National Parks is on affordable housing and Local Plans should respond to local housing needs and prioritise local need affordable housing.¹¹ The Exmoor National Park Local Plan therefore includes an <i>indicative</i> figure for local affordable housing. Updated evidence of housing need carried out by ENPA and SWT to common methodologies and summarised in the ENP Local Plan 5 Year Review Interim Topic Paper¹² demonstrates that the figures for local affordable housing need in the National Park are slightly reduced, and so can be accommodated within the current ENP Local Plan policies.¹³ It is not considered that this is a reason to trigger a review of the ENP Local Plan.</p>

¹⁰ National Planning Policy Framework (July 2021) paragraph 176

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

¹¹ DEFRA, English National Parks and the Broads UK Government Vision and Circular 2010

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/221086/pb13387-vision-circular2010.pdf, para 78.

¹² [Local-Plan-Review-Interim-Housing-Topic-Paper.pdf \(exmoor-nationalpark.gov.uk\)](#)

¹³ [2021-11-29-FINAL-ORS-Exmoor-NPA-Ind-LHNA.pdf \(exmoor-nationalpark.gov.uk\)](#)

Question 12: Updated evidence (summarised in the interim housing and community topic paper) shows there have been continued rises in house prices and an increased affordability gap between house prices and wages within the National Park, and therefore affordable housing for local communities remains a priority. To what extent do you agree or disagree with this statement?

Name/Organisation	Response	Comments	ENPA Response
Nicola Kemp, Rural Housing Enabler - Somerset West and Taunton	Strongly agree	Local intelligence supports this answer - also is a national problem as house prices continue to rise faster than wages	Noted
James Holbrook/ Somerset West and Taunton	Agree	-	Noted

Question 14: Our analysis to date (in the summary paper and housing and community topic paper) suggests that changes are not needed to the housing strategy and housing policies. To what extent do you agree or disagree with this statement?

Name/Organisation	Response	Comments	ENPA Response
Nicola Kemp, Rural Housing Enabler - Somerset West and Taunton	Disagree	We don't believe the policies within the Local Plan are too restrictive, however, more quantitative details such as including plot values to provide clear guidance to potential landowners and developers, and a regular review process for values could be helpful.	Noted. ENPA is preparing additional guidance to support affordable housing delivery
James Holbrook/ Somerset West and Taunton	Disagree	Changes may not be required to housing policies but the strategy may need to be updated to include reference to the Exmoor National Park climate emergency and the importance of biodiversity net gain. Please see additional points in Somerset West and Taunton Councils response to Question 11.	Noted

Question 16: The Rural Enterprise Exmoor (REE) Vision talks about more housing for local people in general, which would widen the focus of the current Plan which is for local people who need affordable housing. A link to information on the vision can be found on the Local Plan 5-Year Review webpage. As well as prioritising local affordable housing including for local workers and through self or custom build, the Local Plan has policies enabling a variety of

other housing for local people such as rural workers, succession farming, extended family and accessible and adaptable housing. Widening the policies further to consider any local (but not affordable) housing could have consequences in terms of the ability to deliver affordable housing for local people. What do you see as the potential negative or positive consequences of allowing more local housing?

Name/Organisation	Response	ENPA Response
Nicola Kemp, Rural Housing Enabler - Somerset West and Taunton	Widening the policies may have an impact on plot and property values which could have a detrimental effect on affordable housing availability. However, if the policies were widened, we would like to see a restriction to homes being available for local people as their principal residence to mitigate the impact.	Agreed
James Holbrook/ Somerset West and Taunton	The two significant 'drivers of change' which include an increasingly green agenda in response to the climate and nature emergencies are a positive consequence.	Noted

Question 17: Monitoring suggests there has been some loss of community facilities due to permitted development changes, but that policies have enabled some to be replaced or diversified to help with their long-term viability. Our analysis to date suggests that changes are not needed to policies to continue supporting community facilities. To what extent do you agree or disagree with this statement?

Name/Organisation	Response	Comments	ENPA Response
Nicola Kemp, Rural Housing Enabler - Somerset West and Taunton	Neutral	No comment	-
James Holbrook/ Somerset West and Taunton	Agree	-	-

Question 19: Please indicate from the following options which statement is closest to your views on the Local Plan policies on housing and community.

I fully support the policies in the Local Plan on housing and community
I support the housing and community policies in the Local Plan but would like ways to be found to improve their delivery
I am neutral on the policies in the Local Plan on housing and community

I generally support the intentions of the policies in the Local Plan on housing and community but feel that they may need some updating and fine tuning to make them more effective
I consider that the policies on housing and community are out of date when considered against the latest national policies and up to date evidence

Name/Organisation	Response	Comments	ENPA Response
Nicola Kemp, Rural Housing Enabler - Somerset West and Taunton	I support the housing and community policies in the Local Plan but would like ways to be found to improve their delivery	Staff shortages have put pressure on implementation. More resources would support the delivery.	Noted. The RHE post plays a vital role in supporting delivery of affordable housing on Exmoor and SWT funding for this five year post is very welcome
James Holbrook/ Somerset West and Taunton	I support the housing and community policies in the Local Plan but would like ways to be found to improve their delivery	-	-

Question 21: Please provide additional comments on the questions above or other policies in the housing and community topic. Please tell us which policies your comment refers to, be as specific as possible, providing examples and a brief outline of your reasons. If you have no further comments to make, please indicate this by entering 'N/A' into the text box.

Name/Organisation	Response	ENPA Officer Response
Nicola Kemp, Rural Housing Enabler - Somerset West and Taunton	N/A	-
James Holbrook/ Somerset West and Taunton	In relation to sustainable development and in reference to the Duty to Cooperate meeting held with Local Authority partners on 27th September 2021, Somerset West and Taunton would like to reiterate the importance of considering neighbouring settlements, such as Minehead as a named settlement in the Local Plan. This specifically relates to Policy SE-D2 and the impacts of biodiversity net gain, economic development opportunities and flood management.	This issue was raised via a SWT officer email following the meeting in September 2021. The built area of Minehead lies within the Somerset West & Taunton local planning authority area and Minehead is a

Name/Organisation	Response	ENPA Officer Response
		<p>named settlement in the West Somerset Local Plan. It is considered that a change to the Exmoor National Park Local Plan spatial strategy to classify land in the National Park between Minehead and Dunster as a named settlement would be inappropriate because of the likely landscape impacts/harm resulting from new development between Minehead and Dunster. There are significant concerns about the principle of amending the spatial strategy to enable new development / the growth of Minehead into a nationally protected landscape given the statutory purposes of, and national policy for, National Parks.</p> <p>Policy SE D2 seeks to safeguard existing employment sites in the National Park.</p>

Environment

Question 23: Biodiversity net gain (BNG) is a new legal requirement for development, and/or land management, that aims to leave the natural environment in a measurably better state than it was beforehand. The interim environment topic paper explains that current Local Plan policies refer to biodiversity enhancement rather than net gain, but it is considered that the legal requirement for BNG can be implemented within current policy, and no changes are necessary. To what extent do you agree or disagree with this statement?

Name/Organisation	Response	Comments	ENPA Response
James Holbrook/ Somerset West and Taunton	Neither agree or disagree	Given that Exmoor National Park have declared a climate emergency, ENP will need to ensure that they are satisfied that their policy approach takes into account the emerging legal requirements of Biodiversity Net Gain (BNG).	Noted. The current Local Plan policies enable BNG and ENPA is working on Planning Guidance to support delivery of the new legal requirements. It is not necessary for national legislation and policy to be repeated in Local Plans

Question 25: It has been suggested that the Authority should prepare an Exmoor-specific approach and guidance to implementing BNG as this could be helpful for applicants and landowners. To what extent do you agree or disagree with this statement?

Name/Organisation	Response	Comments	ENPA Response
James Holbrook/ Somerset West and Taunton	Neither agree or disagree	Given that Exmoor National Park have declared a climate emergency, ENP will need to ensure that they are satisfied that their guidance takes into account the emerging legal requirements of Biodiversity Net Gain (BNG). Emerging guidance nationally may provide enough suitable guidance to help applicants and landowners in the National Park.	Noted. The current Local Plan policies enable BNG and ENPA is working on Planning Guidance to support delivery of the new legal requirements. It is not necessary for national legislation and policy to be repeated in Local Plans

Question 27: Exmoor National Park Authority has declared a climate emergency and there is greater awareness of the urgency to respond to climate change. Contributions to date include responding via land management e.g. through peatland restoration and woodland creation. Whilst there is a limit to what planning can control and the scale of development in the National Park, there are positive Local Plan policies enabling renewable energy schemes, adaptation to flood risk and coastal change. Therefore, it is considered that at this stage there is no need to amend the policies to respond to the climate emergency. To what extent do you agree or disagree with this statement?

Name/Organisation	Response	Comments	ENPA Response
James Holbrook/ Somerset West and Taunton	Neither agree or disagree	Given that Exmoor National Park have declared a climate emergency, ENP will need to ensure that they are satisfied that their policy approach takes this into account.	Noted. ENPA's interim conclusions are set out in the Topic Papers. While it is acknowledged that there is scope to strengthen Plan policies, it is

Name/Organisation	Response	Comments	ENPA Response
			<p>considered that this does not trigger the need for a Local Plan review because existing policies e.g. GP1 provide the means to seek action on climate change. GP1 requires that all development proposals must take opportunities to contribute to the sustainable development of the area including particular attention to:</p> <ul style="list-style-type: none"> - using sustainable building techniques, materials and minimise energy use and waste; and - the needs of future generations through sustainability and resilience to climate change and adapting and mitigating the impacts of climate change. It is considered that more action is however needed to ensure that opportunities are taken including updating the local list of validation requirements and producing further planning guidance.

Question 29: There is now a much greater emphasis on design in national policy. As a National Park, the Local Plan already has detailed policies on design and the Authority is also working on an updated Design Guide which will expand upon the policies. The analysis to date in the interim environment topic paper has not identified a need for policies to be changed. To what extent do you agree or disagree with this assessment?

Name/Organisation	Response	Comments	ENPA Response
James Holbrook/ Somerset West and Taunton	Agree	-	-

Question 31: Please indicate from the following options which statement is closest to your views on the Local Plan policies on the environment.

I fully support the policies in the Local Plan on the environment
I support the environment policies in the Local Plan but would like ways to be found to improve their delivery
I am neutral on the environment policies in the Local Plan
I generally support the intentions of the environment policies in the Local Plan but feel that they may need some updating and fine tuning to make them more effective
I consider that the policies on the environment are out of date when considered against the latest national policies and up to date evidence

Name/Organisation	Response	Comments	ENPA Response
James Holbrook/ Somerset West and Taunton	I generally support the intentions of the environment policies in the Local Plan but feel that they may need some updating and fine tuning to make them more effective	-	-

Question 33: Please provide additional comments on the questions above or other policies in the environment topic. Please tell us which policies your comment refers to, be as specific as possible, providing examples and a brief outline of your reasons. If you have no further comments to make, please indicate this by entering 'N/A' into the text box.

Name/Organisation	Response	ENPA Response
James Holbrook/ Somerset West and Taunton	N/A	-

Economy

Question 35: The Rural Enterprise Exmoor evidence highlights the very high proportion of micro-businesses on Exmoor. Local Plan policies provide for a flexible approach to business development in settlements and the open countryside as well as home-based businesses. The analysis to date in the interim economy topic paper has not identified a need for policies to be changed. To what extent do you agree or disagree with this statement?

Name/Organisation	Response	Comments	ENPA Response
<p>James Holbrook/ Somerset West and Taunton</p>	<p>Neither agree or disagree</p>	<p>In relation to sustainable development, consider whether Minehead should be a 'named' settlement in the ENP local plan? Whilst being on the ENPA boundary, Minehead is not currently a named settlement in the Local Plan but this could address issues with biodiversity net gain, economic development and flood management. Applicable policy is SE-D2.</p>	<p>The built area of Minehead lies within the Somerset West & Taunton local planning authority area and Minehead is a named settlement in the West Somerset Local Plan. It is considered that a change to the Exmoor National Park Local Plan spatial strategy to classify land in the National Park between Minehead and Dunster as a named settlement would be inappropriate because of the likely landscape impacts/harm resulting from new development between Minehead and Dunster. There are significant concerns about the principle of amending the spatial strategy to enable new development / the growth of Minehead into a nationally protected landscape given the statutory purposes of, and national policy for, National Parks.</p> <p>Policy SE D2 seeks to safeguard existing employment sites in the National Park.</p>

Question 37: The coronavirus pandemic has impacted on the tourism sector and it is difficult to predict what the long-term effects will be and therefore changes that might be considered in the future to respond to these effects. From the evidence to date, the Local Plan policy approach is considered to be sufficiently flexible to enable future recovery. To what extent do you agree or disagree with this statement?

Name/Organisation	Response	Comments	ENPA Response
James Holbrook/ Somerset West and Taunton	Neither agree or disagree	-	-

Question 39: There are many challenges and changes facing the farming and land management sector including the coronavirus pandemic and leaving the European Union and it is difficult to predict what the long-term effects will be and therefore any changes that might be considered in the future to respond to these effects. From the evidence to date, the Local Plan policy approach is considered to be sufficiently flexible to respond to future needs and changes in this sector. To what extent do you agree or disagree with this statement?

Name/Organisation	Response	Comments	ENPA Response
James Holbrook/ Somerset West and Taunton	Agree	-	-

Question 41: The Rural Enterprise Exmoor Vision highlights digital connectivity as a key objective. Monitoring data shows a high number of permissions granted for telecommunications masts and mobile communications infrastructure. The analysis to date suggests that the Local Plan policies provide an appropriate basis to support the future roll out of digital connectivity in the National Park.

To what extent do you agree or disagree with this statement?

Name/Organisation	Response	Comments	ENPA Response
James Holbrook/ Somerset West and Taunton	Neither agree or disagree	It is noted that a long-term vision for rural enterprise on Exmoor (REE) has been developed and that one of the significant 'drivers of change' is 'a technologically driven digital world'.	Noted. ENPA's conclusions are set out in the interim Topic Papers. It is recognised that digital connectivity is a significant driver of change. However, the monitoring, evidence and analysis carried out for the review

Name/Organisation	Response	Comments	ENPA Response
			indicate that the Local Plan policies are enabling appropriate development within the National Park'

Question 43: Please indicate from the following options which statement is closest to your views on the Local Plan policies on the economy.*

I fully support the policies in the Local Plan on the economy
I support the economy policies in the Local Plan but would like ways to be found to improve their delivery
I am neutral on the economy policies in the Local Plan
I generally support the intentions of the economy policies in the Local Plan but feel that they may need some updating and fine tuning to make them more effective
I consider that the policies on the economy are out of date when considered against the latest national policies and up to date evidence

Name/Organisation	Response	Comments	ENPA Response
James Holbrook/ Somerset West and Taunton	I generally support the intentions of the economy policies in the Local Plan but feel that they may need some updating and fine tuning to make them more effective	-	-

Question 45: Please provide additional comments on the questions above or other policies in the economy topic. Please tell us which policies your comment refers to, be as specific as possible, providing examples and a brief outline of your reasons. If you have no further comments to make, please indicate this by entering 'N/A' into the text box.

Name/Organisation	Response	ENPA Response
James Holbrook/ Somerset West and Taunton	-	-

Final Comments

Question 46: The content of this survey has been structured around the three topics of housing and community, the environment and the economy. If you wish to provide comments on other areas of the Plan or wish to draw our attention to other evidence, please do so below. If you have no further comments to make, please indicate this by entering 'N/A' into the text box.

Name/Organisation	Response	ENPA Response
Nicola Kemp, Rural Housing Enabler - Somerset West and Taunton		
James Holbrook/ Somerset West and Taunton	Thank you for providing Somerset West and Taunton Council with the opportunity to comment on the three topic papers and Exmoor National Parks five year local plan review. SWT are keen to ensure that we continue to support each other in aligning evidence base and any joint work and hope that the comments, predominantly relating to Biodiversity Net Gain and phosphates are of benefit.	Noted and the comment on joint working is welcomed. ENPA and SWT will continue to work together on these topics and in relation to the Duty to Co-operate