

EXMOOR NATIONAL PARK LOCAL PLAN 5 YEAR POLICY REVIEW

ECONOMY TOPIC PAPER: MAY 2022

1. Introduction

This 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.

¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/100575/9/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 policies 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 policies 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 a baseline of business activity pre Covid-19 (data collection was completed approx. 6 weeks before the first lockdown).⁵

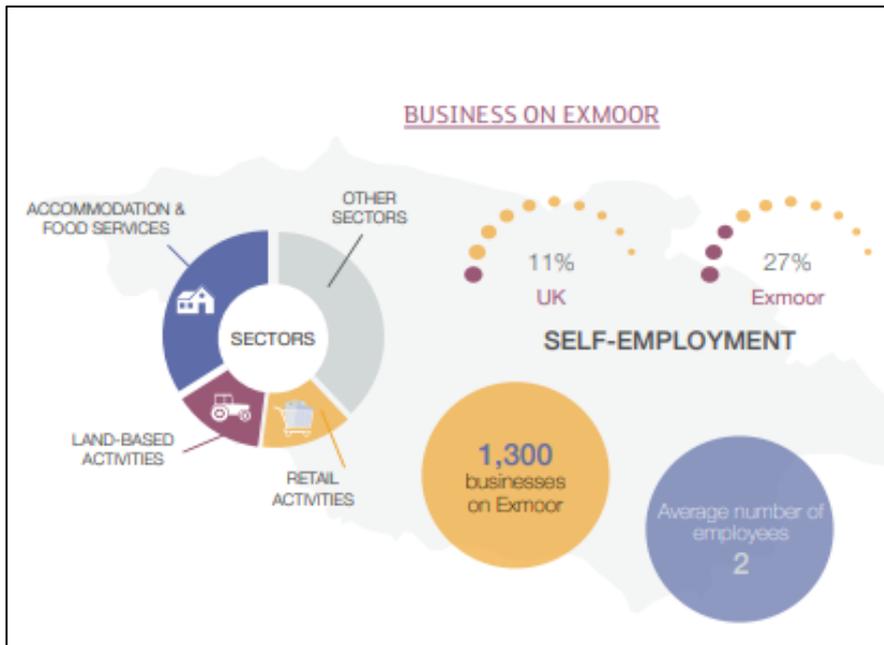
The report revealed a 60% increase in the number of businesses than had previously been identified through national data sets and provided a significant insight into business views. The findings showed that:

- 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.

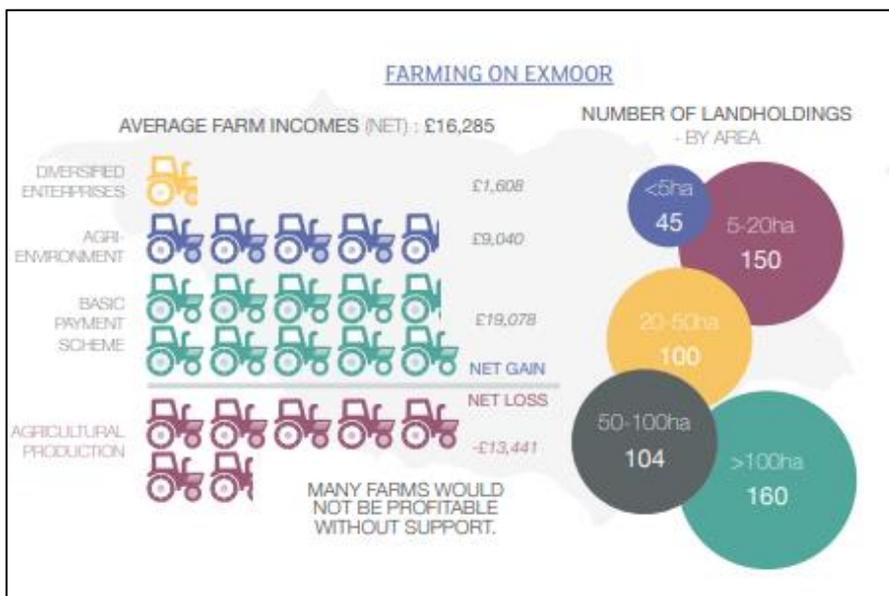
³ <https://www.exmoor-nationalpark.gov.uk/living-and-working/superfast-broadband>

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

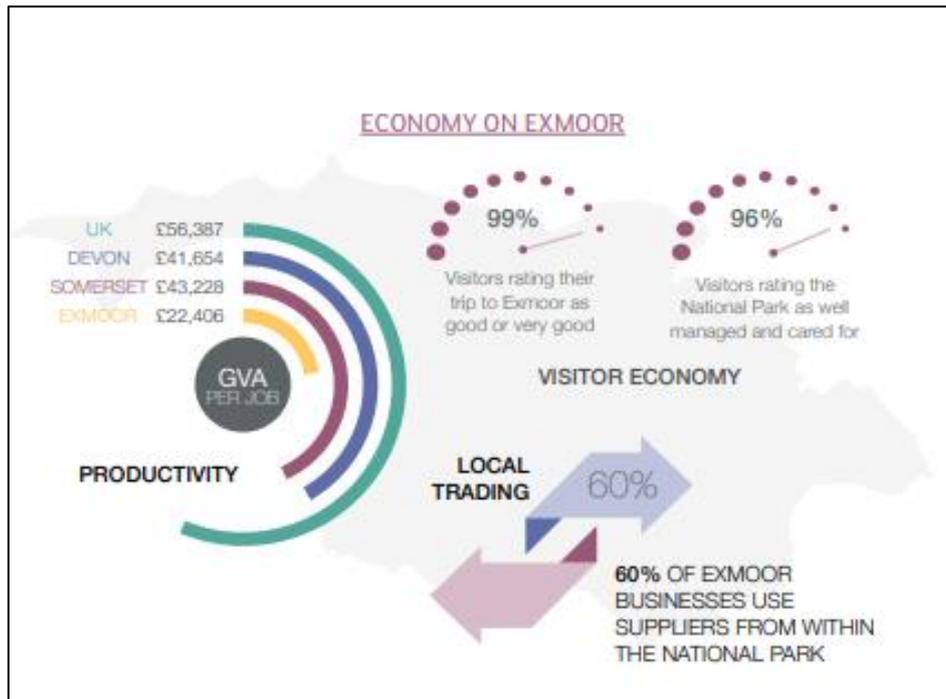
⁵ Research commissioned in 2019 by a partnership including the Heart of the South West Local Enterprise Partnership, four local authorities for the National Park area and the NPA. In 2020 the project partnership was expanded to include representative business groups (Exmoor Hill Farming Network, Visit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

	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%

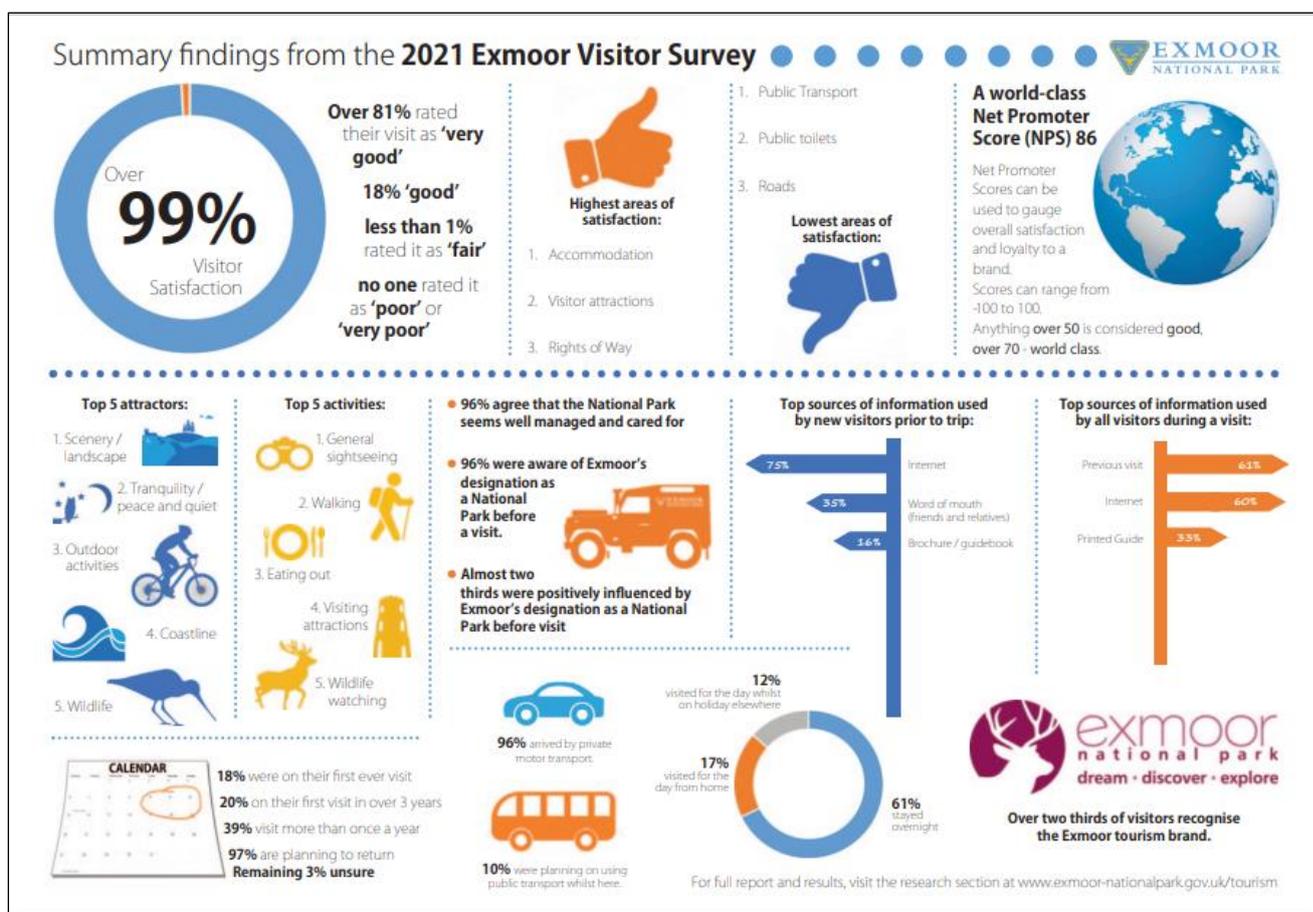
- Serviced accommodation was impacted the most, whilst day visitors were least impacted
- Overall, 2019-2020 is similar to that seen in other National Parks

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 2021 survey was the first face-to-face survey conducted since the start of the Covid-19 pandemic. There have been two previous surveys during the Local Plan period – in 2018 and 2020 (the latter was conducted virtually due to Covid restrictions).⁸



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.

⁸ [Exmoor - Tourism Research \(exmoor-nationalpark.gov.uk\)](http://www.exmoor-nationalpark.gov.uk)

The Exmoor Covid Recovery Plan (March 2021) recognised 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 has highlighted 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, reportedly, many were 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.

Heart of the South West Blueprint for Clean Growth

The review has considered the Heart of the South West Local Enterprise Partnership Blueprint for Clean Growth.¹⁰ It identifies a number of cross-sector activities for the environment and the economy including on low carbon energy, energy efficiency and natural capital. The ‘Clean Growth Priorities’ are summarised in Appendix A.

The Blueprint brings together aspirations from the Government’s Ten Point Plan for a Green Industrial Revolution, the South West Local Industrial Strategy and the Build Back Better Plan. It recognises the role of the area’s natural capital in tackling the climate emergency to achieve net zero carbon emissions to be achieved through partnership working. The food and farming sector has an important part to play in reducing emissions. The HotSW LEP will encourage activities e.g. regenerative and sustainable farming and more carbon capture and storage to reduce emissions. Some activity may fall within the scope of the planning system e.g. farm diversification.

The Blueprint identifies decarbonisation of the area’s existing housing stock as a priority - the Heart of the South West has a high proportion of the UK’s hard to treat homes, many within Exmoor National Park. This is also seen as a significant economic opportunity - supporting employment as well as helping to address fuel poverty.

A key sector that relies on the natural environment is tourism, particularly important for Exmoor. The LEP aim is for the area to be a green tourism destination, reducing the sector’s carbon footprint whilst growing visitor numbers and raising awareness amongst visitors. The LEP is seeking to encourage integration of sustainable tourism initiatives into the Regional Tourism Recovery Plan, including greater collaboration with local communities.

⁹ [Exmoor - Exmoor COVID 19 - Recovery Plan \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk/exmoor-covid-19-recovery-plan)

¹⁰ [HotSW-LEP-Blueprint-for-Clean-Growth-Final.pdf \(heartofswlep.co.uk\)](https://www.heartofswlep.co.uk/HotSW-LEP-Blueprint-for-Clean-Growth-Final.pdf)

4. Stakeholder Engagement

Stakeholder Workshop

A stakeholder online event was held on 2nd December 2021. All those on the Local Plan contacts database were invited to the workshop, along with representatives from Exmoor's parish and town councils. 29 people attended the workshop representing a range of organisations, local authorities, parish/town councils or as individuals. ENPA members and officers also attended.

Background and a progress update on the Local Plan 5-Year Review were presented followed by a series of workshops to hear views on the Plan. Participants were divided into three groups to ensure everyone had an opportunity to participate in a discussion on every topic. The workshop considered a series of questions. A summary of issues raised through the workshop is available.¹¹

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

Online Survey

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

Responses received to the survey have been analysed, reported to members and are set out in a schedule.¹² Feedback included some support for further work such as planning guidance.

Issues relevant to Exmoor's local economy that were highlighted during the stakeholder workshop and in response to the online survey are summarised under four headings below although there is cross-over between them.

Farming and the land-based economy and farm diversification

- Changes to farming / current uncertainty
- Changes may impact on viability and farms may need to be bigger to survive
- A challenging time for land based businesses policies that further support diversification opportunities will allow businesses to plan for further change and upheaval.

¹¹ Exmoor National Park Local Plan 5-Year Review Stakeholder Workshop Summary December 2021 [Exmoor - Exmoor National Park Local Plan 5-Year Review \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk)

¹² Exmoor National Park Local Plan 5-Year Review Survey Responses Schedule [Exmoor - Exmoor National Park Local Plan 5-Year Review \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk)

- Changes to farming may lead to the farming operation being subsidiary to other income e.g. diversification - diversification into tourism was not thought to suit everyone.
- Agricultural ties for housing may prevent diversification
- Intensive farming / large buildings for livestock farming are not supported by policy. Alternative view was that there may be a lack of familiarity with the policies.
- Enable variation / extension of existing businesses needed locally (e.g. engineering fabrication on farms)
- Farming activities are supported by other micro business which need to be in the National Park.
- The current policies are too restrictive.
- Policies generally balance diversification and the environment appropriately.

Tourism, economic diversification and business

- Current Policies may be too restrictive and need change
- Need to understand impact of increased tourism and appropriate balance and whether the impacts outweigh benefits.
- A need to diversify to other industries. Examples of alternatives to diversification into tourism could include emerging carbon bank / natural capital markets
- High proportion of micro-businesses on Exmoor
- Diversify economy for higher skilled, better paid jobs – more/larger business premises and sites - micro businesses may not provide high-paid skilled jobs
- Policies should prevent ad hoc economic development intrusive to local communities and / or landscapes

Working from Home/Home-based Businesses

- Opportunities, especially Post Covid, for those who work from home to move to Exmoor - could include micro-businesses which may also provide employment.
- Way to retain younger people / encourage working people to be based on Exmoor. Need for space / small buildings/ garden offices to enable people to work from home.
- Linked to digital communication.
- Work from home linked to climate changes as it contributes to carbon reductions from reducing the need to travel. High speed digital infrastructure is therefore essential

Digital communications

- There are known problems: poor signal and internet, patchy coverage; need for a strategy to roll out improvements
- Vital for successful businesses
- Masts still needed now but technology may change e.g. cable or fibre, 2025 loss of copper phone service
- Impacts of masts (and ground based infrastructure) on the National Park

A response from Natural England indicated support for policies which highlight landscape character as a determining factor in the siting of communications infrastructure. It advised

that the landscape impacts of any further infrastructure proposals should be carefully considered before permission is granted.

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

5. Duty to Co-operate Outcomes

A Duty to Co-operate meeting was held with local authority partners on 27 September 2021. 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)
- Visitor numbers and 'pop up' campsites through temporary extended permitted development rights
- Infrastructure and digital connectivity

Statements of Common Ground have been agreed with local authorities within Exmoor National Park.¹³ -

In terms of economy, Natural England contributed comments to the online survey on digital connectivity and these are referred to above.

6. 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 - 2018/19.¹⁴ The 2019/20 and 2020/21 AMR is nearing completion. Relevant data is summarised in this paper and a 2019-21 AMR Interim Summary is available.¹⁵

¹³ Statements of Common Ground [Exmoor - Exmoor National Park Local Plan 5-Year Review \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk/planning/planning-policy/local-plan/annual-monitoring-reports)

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

¹⁵ Exmoor National Park Authority Monitoring Report 2019-21 Interim Summary [Exmoor - Exmoor National Park Local Plan 5-Year Review \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk/planning/planning-policy/local-plan/annual-monitoring-reports)

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.

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.¹⁶

¹⁶ https://www.exmoor-nationalpark.gov.uk/data/assets/pdf_file/0031/379318/Farm-Based-Camping-Guidance-Quick-Guide.pdf

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 2019/20 and 2020/21.

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

Table 6 Recreation development				
Indicator	2017/18	2018/19	2019/20	2020/21
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 through '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		
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

7. Officer Conclusions on Economy

The Local Plan was adopted in 2017 and 5years on, **there do not appear to be grounds to suggest changes are needed to planning policies relating to the economy**, including employment, business, recreation and tourism and accessibility, based on the review of national policy, updated evidence, Duty to Co-operate discussions, stakeholder engagement and monitoring.

Appendix A Extract from the Heart of the South West LEP Blueprint for Clean Growth

CLEAN GROWTH PRIORITIES

Low Carbon Energy	<p><u>Nuclear</u>: Create a pipeline of long term opportunities to achieve a sustainable legacy from HPC and accelerate innovation in future advanced nuclear technologies, including fusion.</p>	<p><u>Offshore Renewables</u>: Explore the potential for tidal energy opportunities in the Severn Estuary.</p>
	<p><u>Offshore Renewables</u>: Actively engage in FLOW activity to accelerate investment and secure benefits for the area and establish Ocean Futures as a global centre of excellence for the testing, development and manufacture of autonomy, digital and clean ocean technologies, helping to address many of the technology challenges presented in offshore renewables.</p>	<p><u>Hydrogen</u>: Establish a plan for green hydrogen to become a transport fuel source and support delivery of demonstrator projects.</p>
		<p><u>Other Low Carbon Technologies</u>: Stimulate an increase in installation of low carbon renewable energy and heat technologies, developing a local area energy plan for the Heart of the South West and supporting demonstrator projects for geothermal and bioenergy.</p>
		<p><u>Grid Capacity</u>: Identify ways to unlock grid capacity constraints both to large scale energy generation and key employment sites.</p>
		<p><u>Local Energy System</u>: Transform the energy system by supporting the testing and commercialisation of solutions such as local energy markets, distributed systems and energy storage.</p>
Greening Businesses	<p><u>Research and Innovation</u>: Support research and innovation in environmental science and data, including the planned Environmental Intelligence Accelerator.</p>	<p><u>Business Support</u>: Provide advice for SMEs on how to achieve net zero and a circular economy.</p>
	<p><u>Low Carbon Clusters</u>: Accelerate development of the Low Carbon Enterprise Zones and continue to expand network of Rural Enterprise Centres.</p>	<p><u>Skills</u>: Develop a skills programme to support delivery of clean growth priorities, including targeted training opportunities and curriculum development.</p>

	<u>Digital Connectivity</u> : Improve digital connectivity, connecting places across the Heart of the South West and reducing the need to travel.	<u>Supply Chain</u> : Deliver a local supply chain programme to support businesses in the energy sector, with an initial focus on energy efficiency in response to the drive to retrofit existing buildings.
		<u>Finance</u> : Explore opportunities to develop a green finance deal to support enterprise and business start-ups that are developing innovative products and services for new clean growth markets.
		<u>Agriculture</u> : Identify initiatives to increase uptake of agri-tech solutions and encourage regenerative and sustainable farming.
		<u>Tourism</u> : Incorporate ambitious sustainable tourism initiatives into the Local Tourism Recovery Plan to enable the Heart of the South West to become a green tourism destination.
Sustainable Communities	<u>Sustainable Construction</u> : Require high sustainable construction standards in all new developments, transitioning to the new Future Home Standard when available.	<u>Energy Efficient Housing</u> : Develop a social housing retrofit programme, leveraging funding from the new Social Housing Decarbonisation Fund and integrating it with a skills and supply chain programme.
		<u>Community Energy</u> : Support the SW Energy Hub to secure additional funding for local community energy initiatives.
		<u>Garden Communities</u> : Support the sustainable development of planned new garden communities, ensuring green infrastructure forms an integral part of the masterplans.
Decarbonised Transport	<u>Strategy</u> : Work with Peninsula Transport to ensure a clean strategic transport strategy is in place, incorporating our transport decarbonisation priorities.	<u>Walking and Cycling</u> : Encourage cities and towns to reduce carbon emissions through improved walking and cycling routes.

	<u>Aviation</u> : Establish a Smart Aviation Cluster around Yeovil and Exeter & East Devon, building on Project 2ZERO.	<u>Electric Vehicles</u> : Enable delivery of a reliable electric vehicle charging network along the main strategic road corridors, integrating this with the roll out of electric vehicle charging in cities and towns.
		<u>Public Transport</u> : Promote more sustainable public transport provision, including electrification of the Great Western Mainline.
		<u>Rural Transport</u> : Establish a rural mobility challenge fund as part of a Heart of the South West Rural Productivity Programme.
		<u>Aviation</u> : Develop the proposal for a Future Flight Demonstration Zone in preparation for Phase 3 of the Future Flight Programme.
		<u>Maritime</u> : Pioneer clean maritime by developing innovative pilot demonstrators that build a broad ecosystem, incorporating electrification and hydrogen and exploiting regional specific assets such as offshore energy.
		<u>Freight</u> : Support activity that reduces the carbon impact of freight transport and enables good intermodal connections.
Natural Capital	<u>Investment Fund</u> : Use the LEP's Natural Capital Demonstration Fund to invest in innovative and replicable projects.	<u>Offsetting</u> : Work with partners to explore the potential for a Heart of the South West green and blue carbon offset scheme.
	<u>Best Practice</u> : Actively promote and share best practice on how to embed natural capital into projects, with an initial focus on the Getting Building Fund projects.	<u>Innovation</u> : Organise a regional seminar with stakeholders to explore new innovative finance mechanisms for natural capital.

Analysis: There are opportunities for Exmoor National Park to contribute to the Blueprint for Clean Growth activity. For example:

- **Low carbon energy - low carbon renewable energy and heat opportunities** appropriate in a protected landscape, Existing planning policies provide for small scale renewable energy technologies.
- **Greening business including** through **digital technologies, regenerative farming and green tourism**



- **Sustainable communities - energy efficient housing.** An overarching Local Plan Policy requires that opportunities are taken for sustainable building to minimise energy use and to mitigate and adapt to climate change. Policies also seek to encourage energy efficient development and to encourage carbon reductions beyond Building Regulations e.g. improving energy efficiency. Future work planned for Exmoor includes a review of the design guide. It will address the retrofitting of existing buildings – given the high percentage of historic buildings on Exmoor this will need to provide guidance on sympathetic and appropriate retrofitting.
- **Decarbonised transport – walking and cycling and rural transport**
- **Natural capital -carbon offsetting.** There are opportunities on Exmoor to address both the climate and nature emergencies e.g. offsetting that conserves and enhances the area, innovative financial models for natural capital.