

EXMOOR NATIONAL PARK LOCAL PLAN 5 YEAR REVIEW

ENVIRONMENT TOPIC PAPER: MAY 2022

1. Introduction

The environment is at the heart of the statutory purposes for the National Park. This topic paper relates to section 4 ‘Conserving and Enhancing Exmoor’ and section 5 ‘Responding to Climate Change and Managing Resources’ of the adopted Local Plan. The policies cover a whole range of subjects from nature, biodiversity, heritage, landscape and dark night skies to climate change, flood risk, coastal change, renewable energy, waste management and pollution. Design, sustainable construction and mineral development are also included because they are used in construction and the winning of them has a significant impact on the environment. 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.

2. National Planning Policy and Legislation

Changes to the NPPF have been made since the Local Plan was adopted. The Government has sought to reflect its priorities for the environment through these changes, in particular achieving the goals of the 25 Year Environment Plan (2018), see Appendix A. In addition, the Environment Act became law in November 2021, and introduces a number of new requirements relevant to planning, see Appendix B.

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 which strengthen **environmental protection** and the **response to climate change**. In particular, the definition of achieving sustainable development set out at the start of the NPPF has been amended to include reference to the United Nations 17 global sustainable development goals which address social progress, economic well-being and environmental protection. The ‘presumption in favour of sustainable development’ set out in the NPPF has also been refined to specifically refer to environmental improvement and climate change mitigation and adaptation, alongside meeting local needs: *‘all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and*

infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects’.



One of areas where the NPPF has been strengthened in relation to the environment is **biodiversity net gain**, reflecting the Government’s aspirations for nature recovery set out in the 25 Year Environment Plan and which are taken forward in the Environment Act 2021. The 2012 NPPF sought a biodiversity net gain ‘*where possible*’, this is removed in the 2021 NPPF and there is now a stronger requirement for net gains to be sought at plan and development management decision levels. Opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where appropriate. The Environment Act 2021 makes provision for biodiversity net gain to be a condition of planning permissions. The NPPF 2021 also introduces the concept of **natural capital**, requiring Local Plans to ‘*plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries*’ (para 175).

Another area of national policy that has been strengthened is in relation to **design and beauty**. Both versions of the NPPF seek high quality design and place creation, but the 2021 version takes this further stating that the ‘*creation of high quality, beautiful and sustainable buildings and places is fundamental*’. This focus on quality and design is reflected in amendments to the overarching purposes of the planning system set out in in NPPF, where the social, economic and environmental objectives for achieving sustainable development are set out. The social objective has been amended so that it now includes the fostering of ‘*well designed, beautiful and safe places*’, where the 2012 version referred to ‘*a high quality built environment*’.

The link between design and ‘beauty’ in the NPPF is new and features in a number of places in the NPPF, not all of which are relevant to Exmoor (for example in relation to large scale residential developments and density of development). Of more relevance, is achieving

well-designed places, *'The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.'* The NPPF does not define 'beauty' or 'beautiful places', instead this is described as a 'policy ambition' rather than a test, and planning authorities are expected to work with local communities and developers to decide what this should look like in their areas.

The focus on design is underpinned by the introduction of a new test that development should be well-designed (paragraph 133), if not permission should be refused, especially where it fails to reflect local design policies and government guidance on design. Conversely, *'significant weight'* should be given to development which does reflect local design policies and government guidance and to *'outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area'*.

Local Plans are expected to set out a clear design vision and provide maximum clarity about design expectations. The NPPF requires local planning authorities to create design guides or codes consistent with the National Design Guide and National Model Design Code which were published earlier this year. These can be produced as either part of a local plan or as a supplementary planning document. They can also be prepared at an area-wide, neighbourhood or site-specific scale, and can be prepared by landowners or developers for their own sites. The importance of community engagement in preparing design guides is emphasised, and they must reflect local aspirations for the development of their area.

Another area that is given greater emphasis in the NPPF is the role that **trees** play in contributing to local character, as well as helping in the response to climate change. Local plans and planning decisions are expected to ensure that new streets are tree-lined and to incorporate more trees in developments for example through local parks and orchards, as well as retaining existing trees. There is recognition that the right trees need to be planted in the right places and that these do not compromise highway safety.

There are also some significant changes to the NPPF in the light of the **climate emergency**. As set out above, the definition of sustainable development now includes specific reference to climate change mitigation and adaptation, and reference to the global sustainable development goals also highlights climate action. The Government has stated that further changes to the NPPF relating to climate change and net zero targets are being considered.

The 2012 and 2021 NPPFs both require planning authorities to take a proactive approach to climate change. This is strengthened in the 2021 NPPF and there is an expectation that planning authorities will increase the use and supply of **renewable and low carbon energy** and heat by providing a positive strategy for energy from these sources, identifying suitable areas for renewable and low carbon energy sources, and identifying opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers (para 155).

Specific changes in the NPPF relate to **flood risk and coastal change**. This includes updated requirements for the sequential test for assessing flood risk, which now must take into account all sources of flood risk (including surface water and groundwater flooding) *and the current and future impacts of climate change* (Paragraph 161), and to steer new development to those areas with the lowest risk of flooding from any source. Residual flood risk should be managed by using opportunities for green infrastructure and natural flood management. Applications for some minor developments and change of use would not be subject to the sequential or exception test. However, for sites which are not currently subject to a Sequential Test, the Local Planning Authority may require that this is undertaken so that the risk from all sources of flooding can be tested.

No significant changes to the NPPF policies in relation to the **historic environment** have been identified. However, the overarching objective for the environment has been strengthened so that achieving sustainable development is expected to protect and enhance the natural, built and historic environment, rather than just 'contributing' to their protection (para 8c). Changes relating to design and beauty and creating places are also relevant to the historic environment, including the positive contribution that heritage can make to local character and distinctiveness (para 190).

There are some changes to the NPPF policies on **minerals**, including 'great weight' given to the benefits of mineral extraction in determining applications for new quarries.

3. 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.¹

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.

¹ 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)

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 environment, 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 providing a range of views.

Responses received to the survey have been analysed, reported to members and are set out in a responses schedule.² Feedback included some support for further work such as planning guidance.

Issues relevant to the Exmoor's environment highlighted during the stakeholder workshop and in response to the online survey are summarised below alongside the evidence analysed for the Local Plan 5-Year Review. There is, however, a cross over between, for example, climate change and nature recovery or design and sustainability.

Climate change and renewable energy

- Whether climate change has sufficient prominence - should it guide all other policies?
- Strengthening of policy from 'encourage' & 'promote' to mandatory requirements
- Climate change concerns regarding the Lynton and Barnstaple Railway
- Linking where people live and work to reduce the need to travel
- Development should demonstrate how it will use low carbon and renewable energy
- Opportunity for more locally generated power, especially hydro
- Support for community renewable energy (even if large scale)
- Need for enabling infrastructure for renewable energy
- More flexibility on renewables and listed buildings / Conservation Areas
- The need to retrofit existing housing stock
- Greater emphasis on retaining historic/traditional buildings because of their embodied energy
- Important to link nature and climate crises, allowing space for nature
- A Natural England response encourages the development of a separate approach to the climate change aspects of the plan in order to add further detail to existing policy hooks– linking to local nature recovery strategies and contributions to woodland creation and peat restoration through net gain.

The National Park Authority declared a climate emergency in 2019, along with the UK government, and since then the impact of planning proposals on the climate are specifically set out in all reports to the Planning Committee, in addition to impacts on the natural and historic features for which the National Park is designated. In the case of the Lynton and

² 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)

Barnstaple Railway planning permissions, detailed environmental assessments were taken into consideration and concluded that, although a minor increase in greenhouse gas emissions is unavoidable with any heritage steam railway, steps can and should be taken to mitigate emissions including the use of local and recyclable materials and the planting of trees and hedges. The report also noted that the newer locomotives being used are more efficient and powerful than some historic engines. Additionally, a condition of the planning permission is the requirement for a carbon plan. The railway is part of the history and cultural heritage of the National Park, and its reinstatement is seen as consistent with promoting opportunities for the understanding and enjoyment of those special qualities.

Nature recovery and biodiversity net gain

- Policy change not needed to implement biodiversity net gain (BNG)
- Preparation of Exmoor specific approach / guidance / Supplementary Planning Document (SPD) - provide clarity to applicants
- More proactive approach to engaging with Exmoor residents and guidance/advice needed to contribute to BNG & /or low carbon energy solutions
- Limitations of the standard biodiversity net gain calculator– useful for National Park to develop its own tool/metric.”
- Opportunities for gain through e.g. agriculture buildings and small-scale measures such as bird and bat boxes
- Positive contribution to historic environment
- National Park should go beyond minimum, set net gain at 20% and longer than 30 year habitat commitment
- Opportunity for off-site BNG to provide a new income stream for farmers - should include those who have already done a lot for biodiversity
- Important to ensure that off-site BNG is credible
- Biodiversity enhancement linked with climate emergency,
- Natural England confirmed that Biodiversity Net Gain (BNG) can be implemented without a change to policies, provided support for the development of an Exmoor specific approach with detail on environmental enhancement and the Exmoor strategy for implementing BNG to expand upon and support the policy
- It also suggested there was an opportunity to develop a green infrastructure strategy, that the plan should address best and most valuable agricultural land, soils, irreplaceable habitats and air quality especially impacts on the natural environment.

Design

- Revision of design guide welcomed - it can support existing policies and reflect the Government’s focus on beautiful design
- New guide should include modern design as well as traditional
- Landscaping important to enable more flexibility with design
- There is too much concern over preservation rather than adapting and changing
- Design requirements can make housing unaffordable
- Consider plan requirements for materials, particularly for windows

- Build nature into design as part of buildings

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.**

4. Duty to Co-operate Outcomes

A Duty to Co-operate meeting was held with local authority partners on 27 September 2021. No significant issues with the current adopted Local Plan environment policies were identified at the meeting. A number of topics were discussed including:

- nature recovery / local nature recovery strategies and opportunities for cross-boundary collaboration, potentially around biodiversity net gain and natural flood management
- 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 not anticipated to have a significant impact on Exmoor due to the very small part of the National Park affected. ENPA is also dealing with a number of applications where a SCAIL (Simple Calculation of Atmospheric Impact Limits) assessment is required, particularly for agricultural sheds close to European designated nature sites, which is slowing down the application process
- climate response and opportunities to work collaboratively on actions such as electric vehicle charge points, design guides and energy plans (including renewable energy)
- flood and coastal risk management and increasing impacts due to climate change
- minerals development, particularly the need for local stone
- sustainable development, building back beautiful and local character

A response to the online survey was received from Natural England relating to biodiversity, biodiversity net gain, environment enhancement, and climate change. The key issues of this responses are summarised alongside evidence and stakeholder consultation responses in Section 5 below.

Correspondence received from Historic England related to how the historic environment should be considered as part of a Local Plan review, including highlighting the inter-relationships between housing, community, economy and heritage assets, as well as between the natural and historic environments. It was noted that any particular issues relating to the conservation and management of heritage assets located on or near to the boundary of Exmoor National Park should also be discussed with neighbouring authorities, although Historic England was not aware of any such issues at that time.

A more recent response has been received from Historic England following attendance at the stakeholder workshop. The response noted:

- Historic England advice fed through into the interim topic papers, especially the environment and summary reports.
- the broad findings in relation to the NPPF and the historic environment,
- the progress on conservation areas and appraisals and heritage at risk; and

- intentions to consider the implications of the update to the Exmoor Historic Environment Research Framework and to progress a Design Guide SPD.

The response concluded that Historic England is comfortable with the proposed direction of travel for the Local Plan Review.

Correspondence with the Heart of the South West Local Enterprise Partnership (HotSW LEP) highlights the HotSW LEP Blueprint for Clean Growth.³ This is summarised in Section 3 and Appendix C. The response recognises opportunities to achieve carbon reductions but also to benefit the economy - activities include those linked to natural capital, food and farming he areas' high environmental quality and green tourism, and retrofitting of existing housing.

Somerset County Council mineral's team has noted existing close working between the County and Exmoor National Park Authority (ENPA) on the Local Aggregate Assessment prepared by Somerset County Council in partnership with the ENPA. The response recognises that, in the National Park, major quarry working is very unlikely. Small building stone working may take place, although at the current time, there are no working quarries. The County will continue to engage with the ENPA on this and any other relevant mineral and waste work. No other specific mineral or waste issues were identified but if any were to arise, they could be dealt with through future joint working. E.g. through the review of the mineral and waste plans through the change to a Unitary Council.

5. New and Updated Evidence

Climate change, nature recovery and biodiversity net gain

Since adoption of the Local Plan, Exmoor National Park Authority has declared a climate emergency, and has also adopted a Nature Recovery Vision. The climate emergency declaration commits the Authority to working towards carbon neutrality by 2030, and contributing to wider climate response activities in Somerset and Devon. Exmoor is also part of a commitment by all 15 UK National Parks to achieve net-zero as places by 2045. The National Park Authorities will lead collaborative efforts to pilot new technologies and strategies to reduce carbon emissions and increase carbon sequestration through land management and nature restoration.

The review has considered the Heart of the South West Local Enterprise Partnership Blueprint for Clean Growth.⁴ It identifies a number of cross-sector activities for the environment including on low carbon energy, energy efficiency and natural capital. The 'Clean Growth Priorities' are summarised in Appendix C.

The Blueprint recognises that the area's natural capital is key to tackling the climate emergency to achieve net zero carbon emissions -activity will need to be achieved through partnership working. The food and farming sector has an important role in reducing

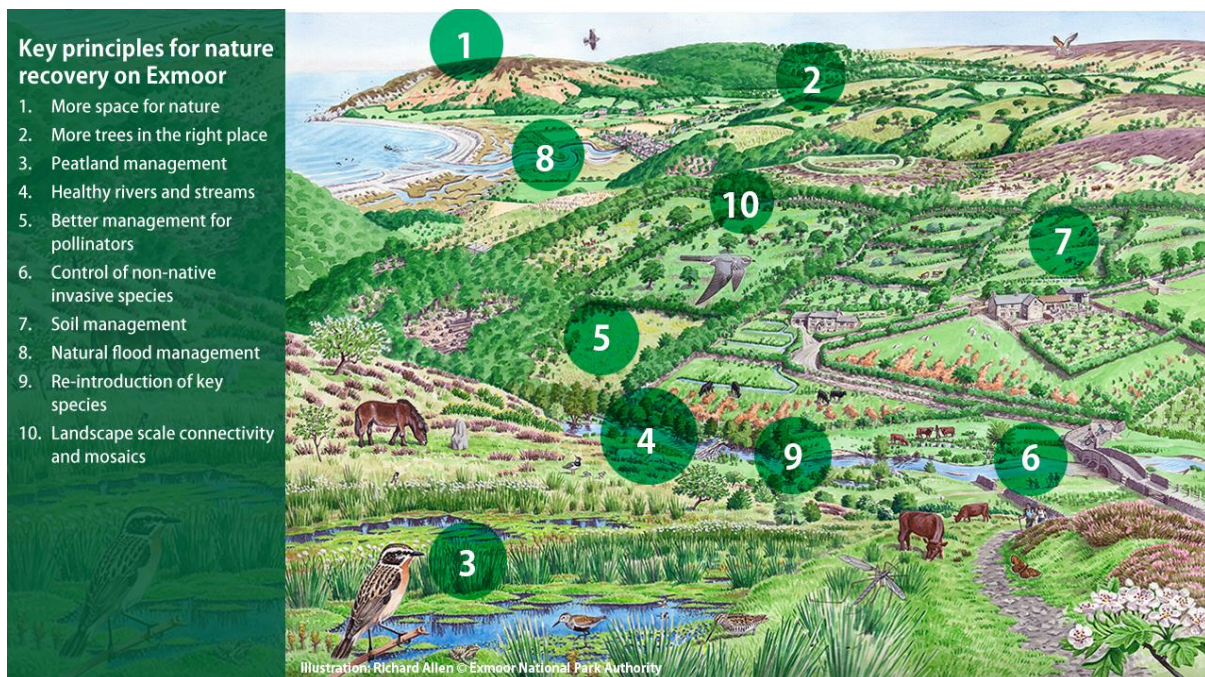
³ LEP [HotSW-LEP-Blueprint-for-Clean-Growth-Final.pdf \(heartofswlep.co.uk\)](https://www.heartofswlep.co.uk/HotSW-LEP-Blueprint-for-Clean-Growth-Final.pdf)

⁴ [HotSW-LEP-Blueprint-for-Clean-Growth-Final.pdf \(heartofswlep.co.uk\)](https://www.heartofswlep.co.uk/HotSW-LEP-Blueprint-for-Clean-Growth-Final.pdf)

emissions, as well as environmental land management. The HotSW LEP will encourage activities e.g. regenerative and sustainable farming and more carbon capture and storage to reduce emissions (including learning through Exmoor’s Farming in Protected Landscapes Programme). Some activity may fall within the scope of the planning system e.g. farm diversification.

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

The aim of Exmoor’s Nature Recovery Vision is to increase the area for nature on Exmoor targets set out in the EU Biodiversity Strategy for 2030 and the Wildlife Trusts’ 30 by 30 campaign, and to contribute to the government’s national ‘Nature Recovery Network’. Exmoor is already rich in nature with 38% of the National Park internationally protected for its habitats and rare species, and a major priority will be bringing these into the best possible condition as nature-rich hubs. Additional nature corridors and buffers will be created, along with nature friendly framing areas, and areas of the National Park will be wilder areas in which wetlands, scrub and woodland would be given space to regenerate.



Exmoor’s nature recovery vision, credit Richard Allen

Already on Exmoor, great progress has been made towards nature recovery and responding to climate change through for example the Exmoor Mires Partnership, which as re-wetted over 2,600 hectares of peatland. A new Trees and Woodland Strategy is being prepared to

support new woodland creation and natural regeneration, towards the national target of 17% woodland cover, compared with 13% today.

A carbon footprint of the National Park was produced in 2010, and an updated version is planned, with further work to follow on the key sectors including farming and land management, travel, and domestic energy.

Historic environment and design

Since the current Local Plan was adopted, Exmoor's Conservation Area appraisals have been updated, and a number of new Conservation Areas are being considered, although not yet designated. A five year update of the Buildings at Risk register has been completed, which shows that there are 46 Listed Buildings at risk, of which 43 are Grade II plus two Grade II* Listed Buildings and one Grade II places of worship. An additional Grade II* building is at risk, but this is also a Scheduled Ancient Monument and so is not included in the figures to avoid double counting.⁵

Sixteen scheduled or listed sites have been conserved across the National Park, funded by Historic England. These sites included prehistoric stone settings, a medieval packhorse bridge, and Barlynch Priory, just to the north of Dulverton.

The Exmoor Historic Environment Research Framework is currently being updated which may provide further information for consideration in future Local Plan reviews. Historic England has also published a range of new or updated advice since 2017 which would inform future reviews.

Work on an updated Exmoor National Park Design Guide has restarted, following a design seminar in 2018 and follow up workshop with local architects, agents and landscape professionals. This will be consulted on and adopted as Supplementary Planning Guidance.

⁵ Historic England also produces a Heritage at Risk Register (2021) which includes Exmoor entries for Scheduled Ancient Monuments, Grade I and II* listings and grade II place of worship:
<https://historicengland.org.uk/advice/heritage-at-risk/>.

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

The Local Plan policies are monitored through the Authority Monitoring Report. 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 - 2018/19.⁶ The 2019-21 and AMR is nearing completion, relevant data is summarised in this paper and an interim summary 2019-21 is available on the website.⁷

Landscape

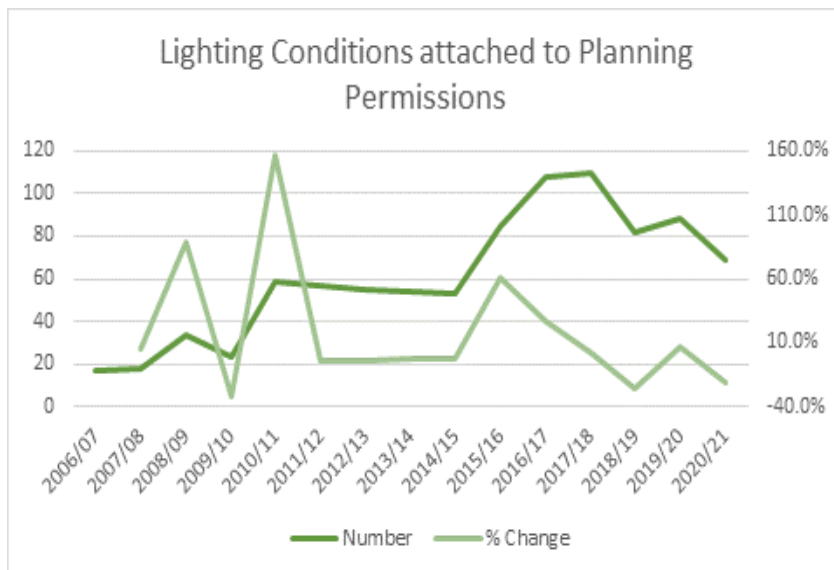
The AMR monitoring indicates that the policies are successfully being used to conserve and enhance Exmoor's landscape character. The number of new masts permitted demonstrates that ENPA continues to respond to applications for masts for telecommunications infrastructure which are important for digital connectivity, and that they can be designed and sited carefully to avoid detracting from the landscape character. One appeal has been lost on landscape grounds which is of concern to the NPA.

Table 1 Landscape				
Local Plan Indicator	2017/18	2018/19	2019/20	2020/21
Number of planning applications refused on landscape grounds	6	9	9	9
Length of traditional hedgerow lost (approved via Hedgerow Removal Notices)	81m	30m	15m	4m
Number of new masts permitted	9	1	1	5

Exmoor's designation as a Dark Skies Reserve means that we need to take care that these dark skies are protected from light pollution. The Local Plan policies promote good lighting management and design, and protect the core of the reserve from permanent illumination. Since 2017, 349 lighting conditions have been added to planning permissions to ensure that development does not detract from enjoyment of the dark night skies.

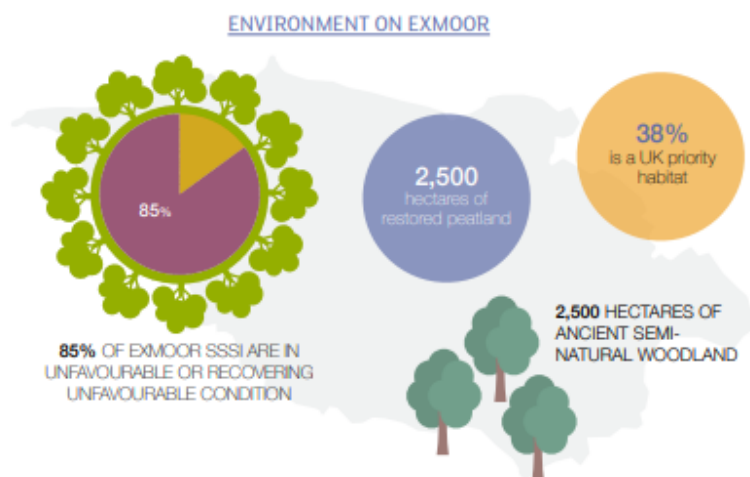
⁶ [Exmoor - Annual Monitoring Reports \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk)

⁷ [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)



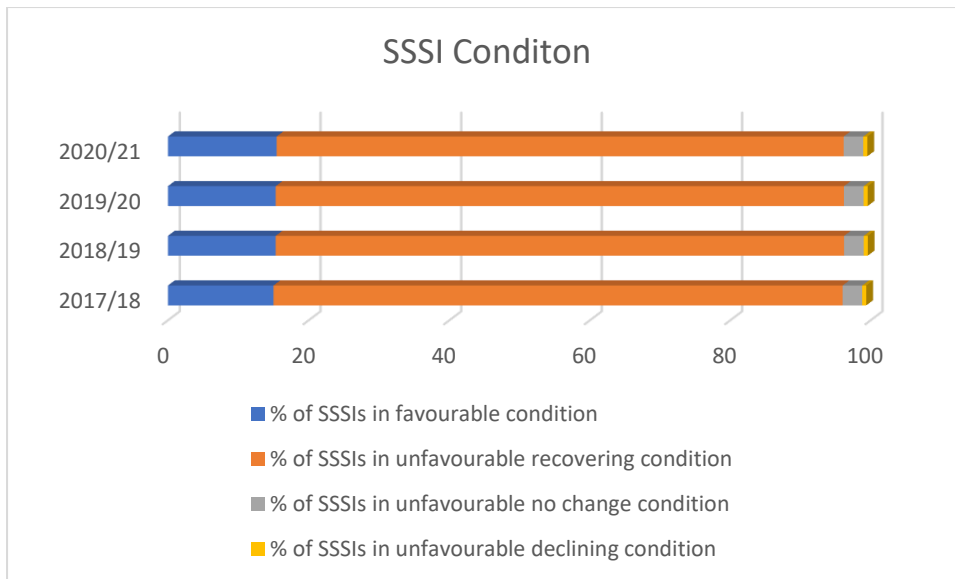
Wildlife

Exmoor has a rich mosaic of wildlife habitats and associated diversity of species.



Source: Rural Enterprise Exmoor Vision

The condition of SSSIs has not really changed over the Plan period, however this is not considered to be due to the Local Plan policies, as most of the issues relating to SSSI condition are outwith the planning system, particularly in relation to land management. There also been a time lag in the SSSI condition assessments being updated. In 2019/20, a new SSSI was designated on ENPA land at Pinkworthy and Driver Farm, so the figures have been adjusted to include this new designation.



As of 2019, 51.4% of monitored watercourses with high or good ecological status. Surveys are conducted on a 3-year basis so the next results on monitored watercourses on Exmoor can be expected in the next AMR. The other AMR indicators suggest that the policies are helping to protect and enhance Exmoor’s biodiversity, including the protection of important species and provision of green infrastructure.

Table 2 Wildlife				
Local Plan Indicator	2017/18	2018/19	2019/20	2020/21
Number and proportion of applications refused for reasons of harm to protected/important species	0	0	3	1
Number of developments with provision for protected/important species	36	42	54	47
Number of developments incorporating green infrastructure provision (including enhancements for wildlife)	X	X	58	57
% of monitored rivers achieving good or high ecological status (under Water Framework Directive)	X	52%	51.40%	N/A
Number of recorded water pollution incidents on Exmoor	24	37	15	13

Historic Environment

The AMR monitoring shows that the Local Plan policies are being used to protect heritage assets. The increase in listed buildings at risk is due to the updated survey done in 2018/19. There has been a reduction in conversions of traditional buildings.

Table 3 Historic Environment				
Local Plan Indicator	2017/18	2018/19	2019/20	2020/21
Number of scheduled monuments affected by development	0	0	1	1
Number of applications refused for reasons of harm to the setting or significance of a scheduled monument	0	0	0	0
Number of applications refused due to adverse impacts on heritage assets and/or their settings	5	2	2	4
Number and % of listed buildings on the 'at risk' register	27 (3.6%)	33 (4.4%)	47 (6.3%)	N/A
Number of applications refused due to adverse impact on historic parks or gardens	0	0	0	1
Number of applications refused due to adverse impact on listed buildings	2	1	2	5
Number of applications permitted for conversions of traditional buildings to different use classes (all classes)	10	8	4	2
Number of applications refused for conversions of traditional buildings to different use classes (all classes)	1	1	0	3

Design

The AMR policies highlight that the policies are supporting high quality design, and that poor design is being refused. The use of traditional materials for roofing is now consistently being applied. In 2019-20 83% of new residential buildings were roofed in traditional materials. An exception to this is one building that was built with a green roof, incorporating native species. Although beneficial for biodiversity, green roofs are not considered 'traditional' across Exmoor.

Table 4 Design				
Local Plan Indicator	2017/18	2018/19	2019/20	2020/21
% of new residential building roofed in traditional materials	50%	100%	83%	100%
Number of planning applications refused on design grounds	10	6	4	8

Climate change

The number of applications relevant to these policies is low, apart from the flood risk policies. Although these numbers seem high, this does not infer that these developments are new developments, but instead include a variety of approvals ranging from extensions, change of use, external alterations and internal alterations, among others. Each application was approved based on its location within a flood risk zone, with reasons for approval including:

- First floor level development only, would not constitute a more vulnerable use
- EA have no objection
- Submitted FRA has suitable mitigation to safeguard development
- No increase in building footprint
- Works only relate to roof

Table 5 Climate Change				
Local Plan Indicator	2017/18	2018/19	2019/20	2020/21
Number of applications refused on the grounds of flood risk or coastal change	0	1	1	0
Number of development (granted permission) located in Flood Risk Zones 2 and 3	X	X	31	16
Number of developments incorporating Sustainable Drainage Measures	X	X	2	0
Number of renewable energy/energy conservation projects permitted in named settlements (Wind, Solar, Hydro, Biomass)	2	2	2	0
Number of renewable energy/energy conservation projects permitted in the Open Countryside (Wind, Solar, Hydro, Biomass)	1	0	1	3
Number of buildings lost and/or replaced due to coastal change	0	0	0	0
Number of water storage facilities permitted	0	0	0	2

Minerals

No applications have been received relating to minerals development.

Table 6 Minerals				
Local Plan Indicator	2017/18	2018/19	2019/20	2020/21
Number of quarries for local building materials permitted	0	0	0	0
Number of other mineral applications permitted	0	0	0	0

Appendix A

25 Year Environment Plan (2018)

This 25 Year Environment Plan sets out government action to help the natural world regain and retain good health. It aims to deliver cleaner air and water in our cities and rural landscapes, protect threatened species and provide richer wildlife habitats. It calls for an approach to agriculture, forestry, land use and fishing that puts the environment first.

The Plan looks forward to delivering a Green Brexit – seizing this once-in-a lifetime chance to reform our agriculture and fisheries management, how we restore nature, and how we care for our land, our rivers and our seas.

The government claims these ambitious proposals will tackle the growing problems of waste and soil degradation – issues that affect our urban areas as well as our countryside. They seek to improve social justice by tackling the pollution suffered by those living in less favourable areas, and by opening up the mental and physical health benefits of the natural world to people from the widest possible range of ages and backgrounds.

They also set out how they will tackle the effects of climate change – still perhaps the most serious long-term risk to the environment given higher land and sea temperatures, rising sea levels, extreme weather patterns and ocean acidification, which harms marine species.

The 25 Year Goals

By adopting this Plan the government seeks to achieve:

1. Clean air.
2. Clean and plentiful water.
3. Thriving plants and wildlife.
4. A reduced risk of harm from environmental hazards such as flooding and drought.
5. Using resources from nature more sustainably and efficiently.
6. Enhanced beauty, heritage and engagement with the natural environment.
7. In addition, the government will manage pressures on the environment by:
 - Mitigating and adapting to climate change.
 - Minimising waste.
 - Managing exposure to chemicals.
 - Enhancing biosecurity.

Main Policies

The government have identified six key areas around which action will be focused:

- Using and managing land sustainably
- Recovering nature and enhancing the beauty of landscapes

- Connecting people with the environment to improve health and wellbeing
- Increasing resource efficiency, and reducing pollution and waste
- Securing clean, productive and biologically diverse seas and oceans
- Protecting and improving the global environment

Analysis

There are key areas of this 25 Year Plan which are relevant to the national park which was produced after the ENP Local Plan was adopted in 2017. Many of the policy areas tie in with the purposes and aims of the national park, but also places a greater emphasis on safeguarding and improving the natural environment which is directly relevant to the national park.

It is considered that this approach lends greater weight and strength to the approach to the environment in the local plan.

Appendix B

Environment Act 2021

The Environment Bill received Royal Assent on 9 November 2021, meaning it is now an Act of Parliament.

Mandatory biodiversity net gain (BNG) as set out in the Environment Act applies in England only by amending the Town & Country Planning Act (TCPA) and is likely to become law in 2023. The Act sets out the following key components to mandatory BNG:

- Minimum 10% gain required calculated using Biodiversity Metric & approval of net gain plan
- Habitat secured for at least 30 years via obligations/ conservation covenant
- Habitat can be delivered on-site, off-site or via statutory biodiversity credits
- There will be a national register for net gain delivery sites
- The mitigation hierarchy still applies of avoidance, mitigation and compensation for biodiversity loss
- Will also apply to Nationally Significant Infrastructure Projects (NSIPs)
- Does not apply to marine development
- Does not change existing legal environmental and wildlife protections

The timelines for introduction of mandatory BNG are dependent on a number of factors. The below is our current understanding of the likely timetable towards mandatory BNG.

- 9 Nov - Environment Bill gets Royal Assent - now the Environment Act
- Government consultation on BNG statutory instruments and regulations
- Spring 2022: Government response to consultation
- Spring 2023: BNG site register and statutory credits sales platform go live

- Winter 2023: Biodiversity net gain expected to become mandatory for all planning developments

Analysis

It is clear that this Act is seeking a step change in biodiversity net gain and there are to be a range of new approaches which will help deliver this through the planning system. This will also lead to new monitoring and ways to implement net gain on and off site with many details of the new regime to be resolved.

Appendix C 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

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. There may be opportunities in 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 including wind and solar.
- **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.
- **Natural capital -carbon offsetting. As a National Park, there are opportunities on Exmoor to address both the climate and nature emergencies through nature recovery and increasing the extent and linking existing woodlands and restoring peat.**