



EXMOOR

NATIONAL PARK

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22 February 2024

EXMOOR NATIONAL PARK AUTHORITY

To: All Members of the Exmoor National Park Authority

A meeting of the Exmoor National Park Authority will be held in the **Committee Room, Exmoor House, Dulverton** on **Tuesday, 5 March 2024 at 10.00am.**

Please Note: To better manage Authority business, Agenda items relating to the Authority's role as sole **local planning authority** for the National Park area, including determination of planning applications, will commence at **1.30 pm.**

The meeting will be open to the press and public subject to the passing of any resolution under s.100(A)(4) of the Local Government Act 1972.

There is Public Speaking at this meeting, when the Chairperson will allow members of the public two minutes each to ask questions, make statements, or present a petition relating to any item relevant to the business of the Authority or relating to any item on the Agenda. Anyone wishing to ask questions should notify the Corporate Support Officer as soon as possible, or at the latest by 4pm on the working day before the meeting of the agenda item on which they wish to speak, indicating a brief summary of the matter or matters to be raised (contact Committees@exmoor-nationalpark.gov.uk).

The meeting will be **recorded**. By entering the Authority's Committee Room and speaking during Public Speaking you are consenting to being recorded. We will make the recording available via our website for members of the public to listen to and/or view, within 72 hours of the meeting taking place.

Members of the public may use Facebook and Twitter or other forms of social media to report on proceedings at this meeting. Anyone wishing to film part or all of the proceedings may do so unless the press and public are excluded for that part of the meeting or there is good reason not to do so. As a matter of courtesy, anyone wishing to film proceedings is asked to advise the Chairperson so that those present may be made aware.

(The agenda and papers for this meeting can be downloaded from the National Park Authority's website www.exmoor-nationalpark.gov.uk).

Sarah Bryan
Chief Executive

AGENDA

The meeting will be chaired by Miss A V Davis, Chairperson of the Authority.

1. Apologies for Absence

2. Declarations of Interest/Lobbying of Members/Unaccompanied Site Visits

Members are asked to declare:-

- (1) any interests they may have in relation to items on the agenda for this meeting;
- (2) any lobbying by anyone concerned with a planning application and any unaccompanied site visits where contact has been made with any person concerned with a planning application.

3. Chairperson's Announcements

4. **Minutes**
 - (1) To approve as a correct record the Minutes of the meetings of the Authority held on 6 February 2024 (Item 4)
 - (2) To consider any Matters Arising from those Minutes.

5. **Public Speaking:** The Chairperson will allow members of the public to ask questions, make statements, or present a petition. Questions of a general nature relevant to the business of the Authority can be asked under this agenda item. Any questions specific to an agenda item can be posed when that item is considered subject to the discretion of the person presiding at the meeting.

6. **Medium Term Financial Plan 2024-25 to 2028-29 and Budgets 2024-25:** To consider the report of the Chief Finance Officer (Item 6)

7. **Exmoor National Park Authority Corporate Plan 2024-25:** To consider the joint report of the Chief Executive and Head of Climate, Nature and Communities (Item 7)

8. **Treasury Management Strategy Statement 2024-25:** To consider the report of the Chief Finance Officer (Item 8)

9. **Scheme of Member Allowances 2024-25:** To consider the report of the Head of Finance and Operations (Item 9)

10. **Appointments to the Planning Committee:** To consider the report of the Head of Climate, Nature and Communities (Item 10)

11. Personnel Update

Starter

11/03/2024 – William Phipps – Exmoor Non-Native Invasive Species (ENNIS) Project Officer – fixed term

Leaver

31/03/2024 – Shirley Blaylock – Senior Conservation Officer (Historic Environment)

Staffing Changes to National Park Centres

The summer season is from 23/03/2024 to 03/11/2024 and the winter season from 04/11/2024 to 28/03/2025.

Dunster National Park Centre

- Peter Hoyland, Centre Manager, and Lisa Clarke, Information Advisor - 21 hours per week during summer season and ad-hoc hours during winter opening.
- Vacancy – Seasonal Information Advisor – 21 hours per week (summer only)

Dulverton National Park Centre

- Anne Brice, Centre Manager, will work 28 hours per week until 15/11/2024 when relocation to Exmoor House will commence.
- Shelley Trace – Seasonal Information Advisor – 21 hours per week (summer only)

Lynmouth National Park Centre - reduced winter opening hours:

- Julian Gurney – Centre Manager (Lynmouth) – 28 hours per week (summer season), and 20 hours per week (winter season)
- Bet Wilde – Information Advisor (Lynmouth) – 21 hours per week (summer season), and 15 hours per week (winter season 2024/25)
- Lynne Gurney – Information Advisor (Lynmouth) – 14 hours per week (summer season), and 10 hours per week (winter season 2024/25)
- Peter Haddock – Seasonal Information Advisor – 21 hours per week (summer only)

12. Any Other Business of Urgency

Agenda items relating to the Authority’s role as sole local planning authority for the National Park area including determination of planning applications. This section of the meeting will commence at 1.30 pm and will be chaired by Mr S J Pugsley, Deputy Chairperson (Planning). If the Deputy Chairperson (Planning) is absent, the Deputy Chairperson of the Authority shall preside.

13. Development Management: To consider the report of the Head of Planning and Sustainable Development on the following:-

Agenda Item	Application No.	Description	Page Nos.
13.1	6/29/23/006	Proposed demolition of existing bungalow and sheds. Erection of replacement eco-bungalow and new shed. (resubmission of application 6/29/21/121) – Hurlstone Bungalow, Allerford, Minehead, TA24 8HJ	1 – 36
13.2	62/43/23/009	Proposed variation of condition 2 of approved application 62/43/23/002 to extend the hours of operation (0700 – 1900hrs) – Woody Bay Station, Lynton & Barnstaple Railway Co Ltd, Parracombe, Devon, EX31 4RA	37 - 49

14. Application Decisions Delegated to the Chief Executive: To note the applications determined by the Chief Executive under delegated powers (Item 14).

15. Site Visits: To arrange any site visits agreed by the Committee (the reserve date being Friday, 29 March 2024 (am)).

Further information on any of the reports can be obtained by contacting the National Park Authority at the address and telephone numbers at the top of the agenda. Details of the decisions taken at this meeting will be set out in the formal Minutes which the Committee will be asked to approve as a correct record at its next meeting. In the meantime, details of the decisions can be obtained by emailing Committees@exmoor-nationalpark.gov.uk

ITEM 4

EXMOOR NATIONAL PARK AUTHORITY

MINUTES of the Meeting of the Exmoor National Park Authority held on Tuesday, 6 February 2024 at 10.00am in the Committee Room, Exmoor House, Dulverton.

PRESENT

Miss A V Davis (Chairperson)
Mr R Milton (Deputy Chairperson)
Mr S J Pugsley (Deputy Chairperson Planning)

Mr L Baker	Mrs Nicholson
Mr A Bray	Mr J Patrinos
Mr T Butt Philip	Mrs F Smith
Mrs M Chilcott	Mrs E Stacey
Mr M Ellicott	Mr N Thwaites
Mr B Geen	Dr S Warren
Mr J Holtom	Mrs L Williams
Dr M Kelly	Mr J Yabsley
Mrs C Lawrence	

Apologies for absence were received from Mr D Elson and Mr M Kravis.

76. DECLARATIONS OF INTEREST: There were no declarations of interest.

77. CHAIRPERSON'S ANNOUNCEMENTS:

- The Chairperson announced the recent sad passing of Mrs Suzette Hibbert, a valued former Member of the Authority. Members were asked to observe a minute's silence to remember Suzette and all she did for Exmoor.

78. MINUTES

- Confirmation:** The **Minutes** of the Authority's meeting held on 5 December 2023 were agreed and signed as a correct record.
- Matters arising:** There were no matters arising.

79. PUBLIC SPEAKING: There were no public speakers.

80. AUDITORS INTERIM ANNUAL REPORT (REVIEW OF VALUE FOR MONEY)

The Authority considered the **report** of the Chief Finance Officer

The Authority's Consideration

Mrs Justine Thorpe from Grant Thornton joined the meeting remotely via Microsoft Teams to present the findings of the Auditors Interim Annual Report (Review of Value for Money) 2022/23 to the Authority Committee.

Mrs Thorpe confirmed that no significant weaknesses in arrangements had been identified however two improvement recommendations had been made in relation to risk management:

- Integrate performance management and risk management through mapping risks to its corporate objectives and risk rating the performance delivery of these

objectives. It should discuss performance and risk at each of its monthly Leadership Team meetings with quarterly report of performance and risks to the Authority.

- The Authority should determine the risk appetite for each of its strategic risks once it has mapped them to the delivery of its corporate objectives.

The Management comments contained in the report confirmed that Leadership Team had taken on board these comments and had taken steps to implement them in the coming weeks.

Upon concluding her presentation, Mrs Thorpe advised that it was intended to present the Audit Findings Report to the Final Accounts Committee in March 2024 and this would be brought to the full Authority at the next subsequent meeting.

RESOLVED: To receive and note the Auditor's Interim Annual Report (Review of Value for Money) for the year ended 31 March 2023.

Mr Butt Philip joined the meeting during this item and was therefore not eligible to vote.

81. PERSONNEL UPDATE: The Authority noted the recent staff changes as set out on the agenda.

82. ANY OTHER BUSINESS OF URGENCY: There was none.

83. CONFIDENTIAL BUSINESS

RESOLVED: To pass a resolution pursuant to Section 100A(4) of the Local Government Act 1972 that the press and public be excluded from the meeting for the duration of Item 10 (ENPA Estate – Proposed Land Sale at East Anstey Common) on the grounds that publicity would be prejudicial to the public interest by reason of the confidential nature of the business arising in Item 10 below and that the following information would be considered which is exempt information as presented in Schedule 12A of the Act (as amended):-

Information relating to the financial or business affairs of any particular person (including the authority holding that information).

84. ENPA ESTATE – PROPOSED LAND SALE AT EAST ANSTEY COMMON

The Authority considered the confidential report of the Head of Access, Engagement and Estates.

RESOLVED: To approve the disposal of land at East Anstey Common as detailed in the report.

The meeting closed for recess at 10.58am

Items relating to the Authority's role as sole local planning authority for the National Park area including determination of planning applications. This section of the meeting was chaired by Mr S J Pugsley, Deputy Chairperson (Planning)

The meeting reconvened at 1.30pm

Mr Baker and Dr Warren left the meeting.

DEVELOPMENT MANAGEMENT

85. Application No: WTCA 24/01

Location: Chypleighs 3 Rosemary Lane, Dulverton, TA22 9DP

Proposal: Works to trees in a conservation area. To cut and lay Beech hedge and to fell 2 no. Cherry trees (2&3)

The Authority considered the [report](#)

RESOLVED: To grant permission for works to trees in Conservation Area.

86. Application No: 6/14/23/003

Location: Blackpitts, Simonsbath, Minehead, Somerset, TA24 7LB

Proposal: Application under Regulation 3 of the Town & Country Planning General Regulations 1992 lawful development certificate for the proposed recladding of building and works to existing walling and roof

The Authority considered the [report](#).

RESOLVED: To grant approval for a Lawful Development Certificate to be issued.

87. APPLICATION DECISIONS DELEGATED TO THE CHIEF EXECUTIVE: The Authority noted the [decisions of the Chief Executive determined under delegated powers](#).

88. SITE VISITS: There were no Site Visits to arrange.

The meeting closed at 1.49 pm.

(Chairperson)

EXMOOR NATIONAL PARK AUTHORITY

5 March 2024

MEDIUM TERM FINANCIAL PLAN 2024-25 TO 2028-29 AND BUDGETS 2024-25

Report of the Chief Finance Officer

Purpose of Report: To consider and approve a Medium-Term Financial Plan (MTFP) for 2024/25 to 2028/29 and to adopt the revenue budget for 2024/25 within the level of funding being provided by way of National Park Grant (NPG) from the Department for Environment, Food and Rural Affairs (DEFRA) and self-generated income.

RECOMMENDATIONS: The Authority is recommended to:

- (1) NOTE the month 9 budget monitoring position for 2023/24;
- (2) APPROVE the Core, Capital and Programmes, Partnerships and Contributions to Reserves Budgets for 2024/25 as summarised in Appendices 2, 3 and 4;
- (3) NOTE the position on reserves as detailed in Appendix 5; and
- (4) ADOPT the attached Medium Term Financial Plan at Appendix 6.

Authority Priority: Getting best value from our resources and improving our performance – Finance and Performance - Financial Management.

Legal and Equality Implications: Local Government Act 2003, Parts 1-3 (Capital Finance, Financial Administration and Grants), and Sections 1-39

Accounts and Audit (England) Regulations 2011, Part 2 (Financial Management and Internal Control).

The equality and human rights impact of the recommendations of this report have been assessed as having no adverse impact on any particular group or individual.

Financial and Risk Implications: The setting of a budget, Medium Term Financial Plan and Capital Strategy are the key elements in the management of financial risk. Section 9 details in more detail the risks surrounding the current budget and our future financial health.

Budgetary control and financial management arrangements are in place to minimise any risk of overspending and to ensure that spending is kept in line with the approved budget. The budget will be reviewed at the half year stage and a progress report made to the November 2024 meeting of the Authority. The budget may have to be revisited before this point if significant adjustments need to be made.

Climate Change Response: This report does not have an adverse impact on our ability to respond to Climate Change. Funds have previously been allocated and will be spent in 2024/25 from the Environmental Resilience Reserve.

1. Introduction

- 1.1 2024/25 is the final year of a three-year grant settlement from DEFRA. This settlement continues to provide a National Park Grant figure of £3,211,500. This is the sixth year that the NPG has been at this level and previous funding to the Authority was as high as £4,177,453 back in 2010/11.
- 1.2 This budget informs the 2024/25 Corporate Plan which is also being presented to this March Authority. That report is based upon the same financial assumptions as this and if the assumptions prove to be inaccurate then targets within the Corporate Plan may also have to be revisited.
- 1.3 This budget report provides additional statements and declarations from previous years. In particular, we are now showing an additional section on in-year budget monitoring, a capital budget and a formal declaration on the 'Adequacy of Estimates'.
- 1.4 Members will be aware that the budget setting process has been different this year from others. Members have been updated as the assumptions contained in the 2023/24 budget were updated and the savings target grew. There have been regular discussions around the Business Review process and Corporate Plan priority settings to ensure the best means of meeting the 2024/25-2027/28 budget gap. In December 2022 the Authority agreed to a new charging regime being introduced.

2. Budget Monitoring 2023/24

- 2.1 The Authority's External Auditors have recently suggested that in year budget monitoring be increased to three times a year. Members now receive statements on the new year when the previous year's accounts are closed, in November, at revised estimates stage and on month 9 when the forward year budget is presented.
- 2.2 Appendix 1 shows the month 9 income and expenditure figures for the Authority. The information in the statement provides the opportunity to highlight any issues that have arisen since the month 6 figures were provided with the Revised Budget in November. In particular:
 - Costs in the long running planning dispute continue to rise. The Legal Contingency will be applied to meet these and there is assumed to be an additional take from the General Contingency.
 - The Development Management budget whilst projected to end the year close to budget, has seen a reduction in planning fee income which is offset by carried staffing vacancies.
 - Conservation Advice and Support is expected to overspend at year-end following additional project spend which has exceeded the funding available.
 - Land, Property Services and Estates cost centres are projecting a large overspend. Primarily due to surveys and appraisals for elements of the Authority's estate (Driver, Wheel Eliza and Weir Cleave), however also due to timing differences in the receipt of CS and other contributions.
 - Interest received will be greater than that assumed within the Revised Budget.
- 2.3 The financial impact of these are reflected in the assumed take from reserves shown in Appendix 5.

3. Core Budget for 2024/25

- 3.1 The Core budget for the Authority reflects the anticipated income and expenditure for ongoing services in 2024/25. This is shown in Appendix 2.
- 3.2 The Authority is statutorily required to set a balanced budget in furtherance of the Purposes of its National Park designation. As described in 1.4, the budget setting process this year has been especially challenging, though Members have been fully supportive throughout.
- 3.3 A business review process commenced in 2022, this was implemented to ensure the best means of meeting the 2023/24-2027/28 budget gap. The process involved regular discussions around the Business Review process and Corporate Plan priority settings. The Business Review had two key drivers: the need to make savings, and the need to refocus our work. Since the publication of the Landscapes Review in 2019 and the Environmental Improvement Plan in 2023, DEFRA has asked National Parks to increase our emphasis on nature recovery, climate, diversity, and health and wellbeing. However at the same time, we have also had to work with a static grant from DEFRA. The business review is this organisations response to these challenges, to prepare the organisation for the future and to remain delivering out National Park Purposes.
- 3.4 Initial savings required to be achieved for 2023/24 were £255,000. Following the 2023/24 budget approval, a further savings requirement of £193,000 was identified for 2024/25, a combined total of £448,000. The actions below detail the Business Process measures which have contributed to this savings target being met and a balanced budget being set for 2024/25 and proposed for 2025/26 also:
- Our initial focus was on the Access and Rights of Way service, and we were able to secure additional and more secure funding from Somerset Council and Devon County Council until 2026. Other income streams and savings were identified to enable us to keep this service in-house. Priorities and work programmes of the team were changed to reflect this.
 - Delivery Team brought forward options for savings and opportunities for additional income from their teams which has fed into our financial forecasting.
 - Discussions with our local councils and other National Parks exploring opportunities for shared services have taken place and these will continue.
 - Expressions of interest for voluntary redundancy were sought, some of which we have taken forward.
 - Governance arrangements for the Authority and its meeting schedules have been reviewed and Members have agreed to a smaller Planning Committee and for the Authority to meet less frequently, for a trial period of a year. The Independent Member led a review of Member allowances. We no longer provide lunch for Members on Committee Day. The aim of these changes is to enable Members to contribute to the savings needed.
 - The Estate Strategy is driving work to make the most of the Estate and generate income, through rent reviews, Countryside Stewardship applications, a Landscape Recovery bid and making sure our buildings are put to good use.
 - Our Woodland team continues to find imaginative ways to fund staff and create new woodlands in the landscape.
 - We continue to emphasise opportunities for income including through sponsorship, introducing charges at some of our car parks, letting mobile

catering concessions at our car parks, and making best use of our assets such as letting the Dulverton Warehouse and Simonsbath Sawmill.

- We have offset some of our core staff costs with external funding for those staff whose roles deliver against the requirements of a funded project or programme. We have incorporated this into our savings but will need to review the situation as funding comes to an end and/or when other funding opportunities are confirmed.
- We will continue to find other savings such as service agreements, ensuring we get best value for money.

3.5 The opportunity was taken to make changes across the organisation, to realign structures and staffing to deliver the priorities that government expects of National Park Authorities. The budget set out in Appendix 2 reflects the Business Review structure.

3.6 Further changes to the layout include a complete revision to the subjective headings upon which budgets and actual spend are reported on. Back in 2010, when ENPA faced four years of unprecedented reductions in core grant, we refocused the organisation into 3 bubbles, Support to Land Managers, Support to National Park Users and Support to Communities and Businesses. This has served us very well for over a decade; however, this is now becoming fairly restrictive in terms of reporting to Defra, other Government departments and internally as part of our management accounts. As part of the Business Review process, our sections and cost centres have been reclassified across the following subjective headings:

- Conservation of Cultural Heritage
- Conservation of Natural Environment
- Forward Planning & Communities
- Development Management
- Promoting Understanding
- Rangers, Estates & Volunteers
- Recreation Management & Tourism
- Support Services
- Corporate & Democratic Core

3.7 The other changes to budgets can be explained by the assumptions that underpin it. The main assumption is that staff pay will increase by 3%. This is a key assumption as staff costs are such a high proportion of the Authority's overall costs.

3.8 2024/25 is the second year when the most recent Local Government Pension Scheme pension fund revaluation affects budgets. This sees a halving in our pensions deficit funding (down to £78,400pa) and an increase in the employer contribution rate from 18.5% to 21.3%. The net effect of these changes are broadly cash neutral. The budget also contains increases for utility bills and further reductions in travel budgets.

4. Programmes, Partnerships & Contributions to Reserves

4.1 The Programmes and Partnerships element of the budget is an important element in achieving National Park purposes and priorities through the engagement and influencing of partners and funding for initiatives aimed at achieving Partnership Plan priorities. We contribute to reserves on an ongoing basis to meet one-off costs that

do not arise in a consistent or predictable manner or to put money aside to meet pressures that arise in-year.

4.2 Attached at Appendix 3 is the proposed Programmes, Partnerships & Contributions to Reserves Budget for 2024/25. This shows £270,000 contributed to reserves and £30,000 top sliced for fixed term programmes.

4.3 Detail on the additions to reserves are listed below.

- Modernisation. A one off contribution of £100,000 to supplement our existing reserve in respect of Modernisation Funds. This is required to support the one-off transitional costs of implementing the Business Review process, ensuring our organisation is fit for purpose and able to continue to meet National Park Purposes.
- Woodlands. This draft budget recommends £25,000 added to the reserve to meet the costs related to Ash-Die back. This takes the total amount of funding on ADB to £300,000. Further tranches of funding will possibly be required before the work is complete.
- Estates Reserve. £50,000 is requested to contribute towards our projects at Driver Farm, repairs at Weir Cleave and the depot roof at Exford.
- Research & Development Reserve £50,000. £25,000 is required to add to the reserve to meet the costs of the Partnership Plan review, taking forward the Nature Recovery Vision and Monitoring, and the Climate Adaptation Strategy. A further £25,000 allocated to meet the reengineering required for our Local Plan.
- Interns. £20,000 is sought to continue the interns and staff development programmes.
- A reduced annual contribution of £25,000 (previously £50,000) to the Corporate Vehicle & Equipment reserve is planned.

4.4 Detail on the fixed term discretionary programmes included in this budget that are shown below. Both Tourism and the Exmoor Hill Farming Network are to receive a reduced level of support from 2024/25.

- Tourism (£10,000). This allocation provides support in relation to our 2nd purpose and includes support to the tourism sector to help promote Exmoor National Park as a special destination and to develop the Exmoor brand, providing advice and support to tourism businesses and those who provide services to visitors to improve their experience, in addition to seeking to grow the capacity of the industry. Work will be led by ENPA and partners such as Visit Exmoor.
- Exmoor Hill Farming Network (£5,000). ENPA has provided financial contributions to the successful and well-regarded Exmoor Hill Farming Network since its genesis, and on 31 January 2020 the Network took the significant step of becoming a Charitable Incorporated Company.
- Further top-sliced elements proposed for 2024/25 include £5,000 towards website development, £5,000 for SERC and DBRC bio records, and £5,000 for STEAM in respect of sustainable tourism information provision.

5. Capital Programme 2024/25

5.1 An intrinsic part of the Medium-Term Financial Programme is the Capital Programme/Capital Budget. This details planned spend on assets over the next

twelve months and, importantly, how they are due to be financed. Previously this was not shown as a separate statement, but as capital spend increases in scale and complexity it is now thought necessary. It brings greater attention to spend on assets and highlights the liabilities that come alongside property ownership.

5.2 Appendix 4 shows the existing capital approvals and budget for 2024/25. The existing capital approvals table highlights the extent of ongoing investment in assets we are undertaking. The 2024/25 budget shows one part internally funded scheme which is not referred to anywhere else within the budget papers. These are items that need funding this year and are described below.

- Driver Farm. Members in December 2023, 'approved the allocation of up to £550,000 from land sales (not yet secured) and the allocation of up to £50,000 from ENPA reserves for the renovation of the house at Driver, repairs to the modern farm building and other capital works as set out in the report'. Alongside this, a grant of £140,000 from the Farming in Protected Landscapes scheme was confirmed to enable repairs to the traditional barn on the East range.

5.3 Members will note that the scheme described above is due to be part funded from capital receipts. This has been made possible by the decision of the Authority in February 2023 to seek disposal of certain assets. If receipts are not generated in time, then funds will have to be found from an alternative source.

5.4 Please note that the capital budget contains assumptions over the future accounting treatment of the schemes described. However, when the accounts are closed there may be other schemes not included that will be treated as capital and schemes shown as capital in Appendix 4 that are not actually capitalisable. Funding decisions may also change at the year-end depending on the availability of capital receipts. Members will have full transparency on the final accounting and funding decisions regarding capital spend.

6. Capital Investment Strategy

6.1 The obligation to provide a Capital Investment Strategy has arisen as some local authorities nationally have become increasingly willing to borrow to invest significant amounts in commercial developments to generate returns to provide additional resources. The Capital Investment Strategy ensures that decision makers are fully briefed on the Authority's approach to managing assets and making investment decisions.

6.2 This is the second year where the Authority is presented a Capital Programme as part of the MTFP. This has become necessary to improve visibility to Members as our use of capital resources and investment in assets has increased in complexity. Previously, pretty much all capital spend was funded from revenue and was small scale or was a distinct scheme that had its own Authority paper.

6.3 Where capital schemes are recommended as part of the budget setting process, we will ensure that the financial implications of the scheme are fully laid out in that paper and that Members have sufficient detail. This will include how the scheme will be funded, why the scheme is necessary and any other financial consequence of the investment decision.

6.4 The Authority historically has a low-risk attitude towards capital investment and much lower need for capital investment than many other public authorities. Our capital schemes often involve maintaining or replacing existing assets rather than new ones. It has never internally or externally borrowed to fund capital schemes, nor has it entered into other long-term liabilities such as Private Finance Initiatives

and does not invest for commercial purposes. Capital investment decisions are made to support National Park purposes.

- 6.5 We seek external contributions towards supporting our capital spend wherever possible. Where capital receipts are available these may be used to finance spend. In the absence of both of these then revenue is applied.
- 6.6 Stewardship of our assets is delivered by a small Land and Property team with a qualified Chartered Surveyor post within the structure. The portfolio is large and diverse, and staff are drafting a new Estates Strategy and Lettings policy at the time of writing. The Authority's Acquisitions and Disposals policy was updated a few years ago. In early 2023, the Rural Surveyor identified assets in our possession that do not contribute towards park purposes and Members have agreed to their disposal. The proceeds will assist in financing the spend listed in 5.2.
- 6.7 Built assets are subject to regular condition assessment, with the majority on a 5-year cycle of external repair and redecoration. Rental income is optimised through regular rent reviews and other opportunities to generate income from property are maximised. The Leadership team are currently considering how best to manage the Estate to achieve park purposes and generate increased income (see 8.19).
- 6.8 Please note our existing risks attached to property liabilities in the table in section 9 also.

7. Reserves (level of)

- 7.1 Appendix 5 shows the anticipated level of reserves as at the end of 2023/24 and reflects the additions to reserves described in section 4 that are recommended as a part of this budget. The reserves position as at the end of 2023/24 includes £450k of funds received as legacies.
- 7.2 The following assumptions have been maintained as part of the review:
- The General Fund Reserve has been maintained at a level of approximately £350,000 as per the Medium-Term Financial Plan. It is the view of the Chief Finance Officer that this is sufficient to manage in-year fluctuations.
 - The Legal Support Reserve is due to fall to zero at the end of 2024/25. This is due to the long running planning case and other pressures described in 2.2. This pot should return to its prudent level when legal processes have completed in 2024/25.
 - The Authority's General Contingency is predicted to be maintained at the level of £350,000. It is the view of the Head of Finance that a general contingency of £350,000 is sufficient and necessary to meet one off pressures that can arise suddenly and need urgent funding. This is considered to be an adequate level of reserves in accordance with section 25 of the Local Government Act 2003.
- 7.3 In recent years there has been a gentle fall in the overall level of reserves and in 2024/25 there is a large reduction in the planned level of reserves. For the most part this is due to programmed spend in areas such the Modernisation Reserve, NPC Spend to Save Reserve, Corporate Vehicle and Equipment Replacement, Environmental Resilience, IT and the Estates Reserve. However, there is also the in-year need to find funds for the issues described in 2.2 and 7.2.
- 7.4 Though there is an assumed large take from reserves in 2024/25 it is important to note two key things. Firstly, that the overall level of reserves is still very good for a public body of the Authority's size and secondly that a budget for 2024/25 is being

recommended that doesn't take from reserves but adds to them. It is for these reasons that I am content to state that the level of reserves is adequate to meet future challenges.

- 7.5 It is a challenge to maintain the Authority's financial resilience in the context of high inflation, a National Park Grant that hasn't increased since 2019/20 and exceptional one-off pressures. We will continue to seek new areas of funding such as capital receipts, external grants or income streams to improve resilience.

8. Medium Term Financial Plan

- 8.1 The Medium-Term Financial Plan (MTFP) is a key feature of the Authority's forward planning process, and it is reviewed annually on a rolling five year basis. Numbers for 2024/25 and 2025/26 are budgets that determine income and expenditure levels whereas numbers from 2026/27 and beyond are projections that will be revisited before they formally become budgets. The MTFP is a key document for:

- outlining future resources, funding opportunities and cost pressures;
- highlighting key assumptions; and
- providing an overview of the future financial position of the Authority.

Appendix 6 details the overarching income and expenditure categories for the Authority for the next five financial years. It is the only Appendix that brings together the Core ongoing budget and investment in Programmes, Partnerships and Contributions to Reserves.

MTFP - Income

- 8.2 2024/25 is the third year of a three-year settlement from DEFRA. We were informed that the National Park Grant level would be cash neutral for the years 2022/23 to 2024/25. From 2025/26 we are continuing to assume a cash neutral NPG level. This is considered to be the more prudent assumption though it is quite possible that we will get small uplifts. Further cash neutral grant position after the current settlement period is the main reason why savings targets continue to increase over the period of the MTFP. These are significant assumptions as this grant provides approximately 75% of our funding. Analysis of the impact of more pessimistic and optimistic scenarios of NPG changes and other variables upon savings targets are shown in the table in 8.16.
- 8.3 In addition to NPG the Authority receives:
- income generated from fees, charges, rents, grants for joint works and from interest earned on the investment of funds held in reserves etc;
 - contributions from the County Councils towards the maintenance of the rights of way network; and
 - external funding for specific projects that either the Authority delivers in its own right or in partnership with others. This will be a key theme in accessing additional resources in the medium term.
- 8.4 The income figures in Appendix 6 show slight increases over the period of the MTFP. As part of the 2024/25 Corporate Planning process, we are refining our Corporate Income Generation Strategy to ensure maximise our non-NPG income and aid in mitigating future savings gaps. Trading income from Parking, Planning and the Pinkery Outdoor Education centre is forecast to continue to increase

gradually. The investment in our car parks is intended to improve the visitor experience and bring in additional funds.

- 8.5 The figures in Appendix 6 reflect the increased and now budgeted revenue and capital contribution from the County Councils towards the management of Public Rights of Way. From Somerset we have contributions indicated for the next two years and for Devon, these are still being confirmed. The MTFP assumes that the level of support continues however both authorities are under significant financial pressure also.
- 8.6 Rent from the estate has for many years been highlighted as potentially impacted by the UK's exit from the EU. Information on future Environmental Land Management Schemes and in particular Countryside Stewardship schemes is starting to become available but is not yet so clear that we can assess the financial impact. The MTFP reflects the known changes to Estates income for 2024/25 and rolls this forward, but the actual picture will be more volatile and less stable than that appears.
- 8.7 So far over the course of 2023/24 base rates have increased from 4% to 5.25%. This had led to large increases in anticipated returns on cash balances and very much helped to balance the budget in 2023/24 and 2024/25. It is very hard to reliably estimate interest on cash for the years after this but it could possibly provide returns in excess of that currently shown in the MTFP. We have prudently estimated £60,000 per annum from year 2 and onwards which equates to an invested balance of £2m at 3%.

MTFP - Expenditure

- 8.8 Appendix 6 also anticipates future expenditure over the MTFP period. The single largest areas of expenditure for ENPA is staff salaries. We don't yet know what the pay award will be for future years but following the significant increases in 2022/23 and 2023/24 we have budgeted 3% for next year, and then 2% for further years. This currently affects both Members expenses and staff pay.
- 8.9 Members will also recall that the Authority developed a new grading structure and undertook a Job Evaluation exercise in 2018-19. The financial impact of this has lasted for 6 years as staff who were affected move through the new increments. 2024/25 is the last year that this has an effect and this adds on an additional 1.5% p.a. on the salary estimates for this year. The Pensions Fund Revaluation was completed and the MTFP reflects the known costs for the years 2023/24 – 2025/26. We assume that those same trends continue for the last two years of the actuarial figures.
- 8.10 For other categories of cost to the Authority a small provision has been found for future years increases. Where increases are known, i.e. that related to the External Audit Fee which has increased by 151%, then provision is made for that. If this proves insufficient then additional resources will have to be found in future years. The MTFP assumes that the organisation undertakes the same activities in the future as it does now. The reality may be very different.

MTFP – Programmes, Partnerships & Contributions to Reserves

- 8.11 The plan in Appendix 6 summarises not only the income and expenditure projections across the period of the plan but also the proportions proposed for Core (the recurring costs and unavoidable commitments for essential services) and Programmes, Partnerships and Contributions to Reserves Budgets. Section 4

details the objectives of the Programmes & Partnerships budget area and planned use in 2024/25.

- 8.12 The MTFP developed includes a planning assumption that the Authority should have £100k set aside annually to meet pressures arising. It also assumes further reductions in support to external bodies, though this is still to be confirmed.

MTFP – Overview

- 8.13 The MTFP presented shows a balanced budget for 2024/25 and 2025/26 but then further savings targets required to be achieved in the final years of the plan. This is the key trend that has been highlighted as part of the process of developing this MTFP.
- 8.14 The Authority has historically monitored the proportion of National Park Grant that is needed to meet the costs of employing permanent staff. This is a proxy for the ability of the Authority to manage short term fluctuations in funding. Staff costs as a percentage of NPG are projected at 90% in 2024/25 (2023/24 78%) and are anticipated to continue to increase further to 98% over the period of the MTFP.
- 8.15 The historic budgetary aspiration of staff costs being only 70% of NPG and having £200,000 of uncommitted funds to meet one-off pressures (or a steep grant cut) is very much out of reach. However, our current level of General Fund and contingencies exceed this. These indicators are still mentioned as they provide some context to our current financial challenges.
- 8.16 Our future financial health will be determined by the accuracy of the assumptions supporting the MTFP and our ability to deliver savings. Overall I am content that the budget presented provides robust estimates and assumptions. However, it is important to show how the savings gap in the final section of Appendix 6 from year 2 onwards could be affected by movements in the key financial assumptions. This is provided for illustrative purposes.

No increase in NPG	Budget Gap/(Surplus) £
2024/25	0
2025/26	0
2026/27	31,000
2027/28	66,000
2028/29	123,000

Variable	Pessimistic Cost Pressure £	Optimistic Saving £
National Park Grant 1%	32,100	-32,100
Staff Pay Award 1% change (2% assumption in MTFP)	28,100	-28,100
Interest Received 1% change (c/f 3% Assumption in MTFP)	20,000	-20,000
Traded Income 1% change	5,000	-5,000

- 8.17 The scenario table shows the financial impact to the Medium-Term Financial Plan balances for a 1% change in core variables; National Park Grant, Staff Pay Award, Investment Interest and/or Traded Income (Planning & Parking Fees, national Park Centre and Pinkery Outdoor Education Centre income). We may also receive one-off capital funding from DEFRA for ad hoc asset spend, this has not been estimated in this report and on confirmation of funding a set of schemes will be considered and actioned. All the scenarios shown in the table above are entirely plausible. This table attempts to illustrate the effects of small changes in assumptions on the savings gap.
- 8.18 Whilst the Business Review described in sections 3.3 and 3.4 has delivered savings and maintained our financial health, there are still projected future savings gaps to meet in the later years of the MTFP (Appendix 6). Section 3.3 describes the savings that we are on course with to deliver a balanced budget in 2024/25. These are all ongoing savings, but we cannot assume that we can simply apply the same level of savings options to future years.
- 8.19 There are other savings options which cannot be precisely quantified but may still generate significant savings. This includes reducing the number of buildings that we maintain or sharing buildings with other public bodies. It is difficult to see charging bringing in a further large increase in income beyond that already projected in the MTFP. Perhaps the greatest opportunity for the Authority to improve its financial position comes from looking more closely at how the Estate can generate income including through the option of bringing land back in hand.

9. Risk Analysis

- 9.1 The budget and MTFP recommended, contain within them assumptions that may or may not prove accurate. In addition, events may occur that have the potential affect the Authority's underlying finances. The risk analysis is as follows:

Risk	Likelihood	Impact	Mitigating Factors
National Park Grant is reduced.	Medium	High	Level of Reserves held. Annual Review. Some notice will be provided of future funding reductions sufficient to enable a timely response.
Pay awards and other inflationary pressures may be higher than anticipated.	Medium	High	Annual review of MTFP Some variations containable.
Liabilities related to the Property or Woodlands Estate arise.	Medium	Medium	A Contingency fund has been established to meet one off costs that arise. Opportunities for developing a pot of capital receipts is being explored.
Contributions from County Councils and Public Rights of Way may reduce.	Medium	Medium	This is subject to an annual review. Reduction in income will be projected in the MTFP.

Economic situation could deteriorate and impact on self-generated income and costs. Areas of income generation in the budget prove unrealistic.	Medium	Medium	MTFP constructed on a five year time span with a review each year. Budgetary Control arrangements in place to monitor income and expenditure on a monthly basis.
An increased reliance on one-off funding sources. This could be a capital receipt, the proceeds from legal action or an external grant.	Medium	Medium	We need to ensure that the Authority's financial stability is independent of any individual one-off event or process.

9.2 A continued key risk in 2024/25 remains managing the consequences of inflationary pressures in the context of a cash neutral NPG and limited opportunities for additional traded income.

10. Conclusion and Financial Standing

- 10.1 It is the job of the budget setting process to ensure that resources are kept in balance while maintaining financial resilience. This report describes the process to achieve a balanced budget, the challenges in the medium term, the level of financial capacity and options available to us in future.
- 10.2 Within the Annual review of Risk Management it was stated that the extent of the financial challenge would be a major test of the leadership and governance of the Authority. So far the test has been passed and the Authority has done very well to get to the point where we are able to recommend a balanced budget for 2024/25. However major challenges remain and indications are that balanced budgets will be increasingly hard to set. In such circumstance, those external funding pots such as the Farming in Protected Landscape scheme or the proceeds of a Heritage Lottery Fund bid, or other schemes yet to be released become increasingly important to deliver key priorities.
- 10.3 Section 25 of the Local Government Act 2003, requires the Chief Finance Officer (S151 Officer) to report to Authority on the robustness of estimates made for the purposes of calculation of budget, and the adequacy of proposed reserves. This report confirms a balanced budget to be set for 2024/25, which is considered to be based on robust and realistic estimates and assumptions. Additionally, the level of reserves including forward year projection, has been assessed as being adequate. This Authority has an excellent record of managing its financial affairs within the resources that are made available and that it is able to generate. The Medium-Term Financial Plan and 2024/25 Budget continue this effective stewardship.
- 10.4 The proposed MTFP, Capital Programme, Core Budget and Programmes and Partnerships Budgets, and Reserves for 2024/25 are contained in Appendices 2-6 which the Authority is requested to approve.

Ben Barrett
Chief Finance Officer
February 2024

Section	Budget Heading	2023/24 Revised Budget £	Month 9 2023/24 Expenditure £	Month 9 2023/24 Income £	Month 9 2023/24 Net Expenditure £	23/24 Anticipated Outturn Position	Notes
Support to Land Managers	Access & Recreation	71,550	107,030	-18,560	88,470	broadly on budget	Includes Simonsbath Project, Includes BMW corporate sponsorship 2 Vacant posts carried in budget. Kubota excavator and Tracked Barrow funded by reserve, internal FST charging successfully implemented Includes Woodland, ENNIS, MIRE and FiPL projects. Some project recharges to be resolved before year-end Ranger EV Van funded by reserve
	Archaeology & Historic Environment	67,350	105,827	-65,000	40,827	broadly on budget	
	Field Services	251,325	265,059	-75,652	189,407	Large underspend	
	Conservation Advice & Support	249,525	813,794	-444,366	369,428	Overspend	
	Rangers	105,525	119,992	-889	119,103	broadly on budget	
Support to Land Managers Total		745,275	1,411,702	-604,467	807,235		
Support services to the Community	Development Management	270,525	331,686	-64,967	266,719	broadly on budget	Planning fee income lower than estimate, offset by carried vacancies Includes CareMore (£56k Income), NPC improvements to be reserve funded
	Planning & Community, Rural Enterprise	155,025	169,152	-11,090	158,062	broadly on budget	
Support services to the Community Total		425,550	500,838	-76,057	424,781		
Support to National Park Users	Education & Volunteers	82,275	97,305	-11,137	86,168	broadly on budget	NPC good performance with net profit to date Completion of decarbonisation works (mostly reserve funded) Tarr Steps borehole works completed (funded through underspend and increased car parking income)
	National Park & Information Centres	124,775	301,432	-185,014	116,418	broadly on budget	
	Information & Interpretation Management	99,300	117,240	-15,255	101,985	broadly on budget	
	Pinkery	0	158,648	-154,955	3,693	broadly on budget	
	Visitor Facilities	1,800	75,480	-73,100	2,380	broadly on budget	
Support to National Park Users Total		308,150	750,105	-439,461	310,644		
Strategy & Performance	Legal Support	52,500	63,582	0	63,582	large overspend	Continued take from legal contingency iro long-running planning case
	Strategy & Performance	230,800	220,159	0	220,159	broadly on budget	
Finance and ICT Services	Finance and ICT Services	267,750	309,880	-100,461	209,419	Large underspend	Interest received is over budget by £25k to date, awaiting finance system charges from SC
Land and Property Services	Land and Property Services & Estates	86,655	276,497	-121,075	155,422	Large overspend	EV Pool Car funded by reserve, Driver Farm Project expenditure, large outstanding FBT debtor from 2022/23
Support Services Total		637,705	870,118	-221,536	648,582		
Corporate Management	Corporate Management	97,875	95,310	-10,000	85,310	on budget	Income is BMW 23/24 Funding towards NPP subscription No invoices from SC to date Underspend on travel expenses
	Historic Pensions Contributions	78,000	0	0	0	on budget	
	Corporate Subscriptions	12,600	12,458	0	12,458	on budget	
	Members	74,325	67,929	0	67,929	Slight underspend	
Corporate Management Total		262,800	175,697	-10,000	165,697		
Total		2,379,480	3,708,460	-1,351,521	2,356,939	Slight underspend	1% positive variance, £22.5k

Section	Budget Heading	2023/24 Original Budget £	2024/25 Expenditure £	2024/25 Income £	2024/25 Original Budget £	Variance between 24/25 Original and 23/24 Original Budgets	Notes
Conservation of Cultural Heritage	Archaeology & Historic Environment	89,100	106,400	-1,200	105,200	16,100	
Conservation of Cultural Heritage Total		89,100	106,400	-1,200	105,200	16,100	
Conservation of Natural Environment	Woodlands	61,100	112,800	-44,000	68,800	7,700	
	Conservation Advice	268,500	219,300	-90,000	129,300	-139,200	23/24 included LT post, 24/25 income is £90k Grant Funding
Conservation of Natural Environment Total		329,600	332,100	-134,000	198,100	-131,500	
Forward Planning & Communities	Planning & Community	87,400	100,400	0	100,400	13,000	
	Rural Enterprise	117,500	125,600	0	125,600	8,100	
Forward Planning & Communities Total		204,900	226,000	0	226,000	21,100	
Development Management	Development Management	336,800	430,800	-116,000	314,800	-22,000	Removal of LT post and reorganisation of staffing
Development Management Total		336,800	430,800	-116,000	314,800	-22,000	
Promoting Understanding	National Park Centres	163,600	327,300	-139,500	187,800	24,200	Removal of Lynmouth Pavilion Rent to Estates, Impact of BR changes
	Grants and Contributions	7,200	3,700	0	3,700	-3,500	
	Pinkery	0	151,800	-151,500	300	300	
	Media & Communication	160,400	114,200	-16,000	98,200	-62,200	Cost centre was interpretation management in 23/24 staff changes
	Education & Interpretation	108,600	117,100	-24,000	93,100	-15,500	2023/24 Included Volunteer Engagement element
Promoting Understanding Total		439,800	714,100	-331,000	383,100	-56,700	
Rangers, Estates & Volunteers	Rangers	82,700	186,600	-58,000	128,600	45,900	Assistant FT Ranger post brought into core establishment
	Field Services	275,800	287,300	-63,500	223,800	-52,000	2 long term vacant posts removed from establishment
	Estates	-131,700	195,800	-391,000	-195,200	-63,500	CS income in relation to Driver Farm
	Volunteer Engagement	0	68,600	0	68,600	68,600	Previously within Education & Interpretation
Rangers, Estates & Volunteers Total		226,800	738,300	-512,500	225,800	-1,000	
Recreation Management & Transport	Access & Recreation	78,300	143,800	-61,000	82,800	4,500	
	Visitor Facilities	9,400	95,400	-95,000	400	-9,000	
Recreation Management & Transport Total		87,700	239,200	-156,000	83,200	-4,500	
Support Services	Finance	134,200	154,900	-60,000	94,900	-39,300	Removal of LT post offset by increased investment interest budget
	Human Resources & Performance	266,800	171,100	0	171,100	-95,700	Removal of LT post, Comms officer to Media & Communications
	ICT & GIS Services	249,400	252,100	0	252,100	2,700	
	Legal Services	70,000	70,000	0	70,000	0	
	Facilities	180,600	188,600	0	188,600	8,000	
Support Services Total		901,000	836,700	-60,000	776,700	-124,300	
Corporate & Democratic Core	Corporate Management	154,500	405,500	0	405,500	251,000	Includes Leadership Team posts (previously within services)
	Historic Pensions Contributions	78,400	78,400	0	78,400	0	
	Corporate Subscriptions	16,800	18,500	0	18,500	1,700	
	Members	98,300	96,200	0	96,200	-2,100	
Corporate & Democratic Core Total		348,000	598,600	0	598,600	250,600	
Core Funding & Partnership Fund	National Park Grant	-3,211,500	0	-3,211,500	-3,211,500	0	
	Reserves Transactions	193,800	270,000	0	270,000	76,200	Appendix 3
	Partnership Fund Top-Sliced	54,000	30,000	0	30,000	-24,000	Appendix 3
Core Funding & Partnership Fund Total		-2,963,700	300,000	-3,211,500	-2,911,500	52,200	
Total Core Budget		0	4,522,200	-4,522,200	0	0	

**EXMOOR NATIONAL PARK AUTHORITY
ANALYSIS OF PROGRAMMES, PARTNERSHIPS AND
CONTRIBUTIONS TO RESERVES**

2024/25

ORIGINAL BUDGET	300,000
 LESS: Contributions to Reserves	
Woodlands - ADB	25,000
Corporate Equipment & Vehicle Replacement	25,000
Estates Capital Projects	50,000
Modernisation	100,000
Internship & Trainee Fund	20,000
Partnership Plan & State of the Park Development & Surveys	25,000
Local Plan	25,000
	270,000
 LESS: Top sliced Programmes	
Tourism	10,000
Hill Farm Network	5,000
Website Development	5,000
SERC/DBRC Bio-records	5,000
STEAM	5,000
	30,000
 2024/25 Programmes & Partnership Fund	300,000

Exmoor National Park Authority 2024/25 Capital Programme

Pre existing approvals

Scheme	Amount	Method of funding	Name of funding source	Status
Valley of rocks car park improvements	12,000	revenue	estates reserve	Completed
Electric Minibus	25,000	revenue	Corp Equipment reserve	Completed
Accessibility Grant	42,000	external grant	Defra	Ongoing
Rights of Way Maintenance	80,000	external grant	County Councils	Ongoing
Display Trailer	7,000	external grant	Visitor Economy Support Programme	Completed
Secondary double glazing Exmoor House	28,000	revenue	Environmental Resilience Reserve	Completed
Pinkery decarbonisation	30,000	revenue	estates reserve	Completed
Pinkery decarbonisation	115,000	external grant	Salix - Treasury	Completed
Pinkery decarbonisation	31,000	revenue	Environmental Resilience Reserve	Completed
Pinkery Roof	62,000	revenue	estates reserve	Not yet commenced
Lynmouth NPC external work	15,000	revenue	estates reserve	Completed
Driver Farm	50,000	revenue	estates reserve	Ongoing
Dulverton NPC Roof/ Offices	15,000	revenue	estates reserve	
Adits and mines	40,000	revenue	estates reserve	Ongoing
Bye Wood	50,000	external grant	Forestry Commission	Completed
Photocopiers	12,000	revenue	Corp Equipment reserve	Completed
Rights of way - cap maint	80,000	external grant	row reserve	Ongoing
Weir Cleave	20,000	revenue	part capital	Ongoing
Tarr Steps bore hole	20,000	receipts	estates reserve	Completed
Pinkery water system	40,000	receipts	estates reserve	Ongoing
Corp equipment reserve	50,000	revenue	Corp equipment reserve	Ongoing
Car park improvements	30,000	receipts	estates reserve	Ongoing

854,000

Capital schemes to be approved as part of 2024/25 MTFP

Driver Farm	740,000	receipts/reserve/FiPL	Mixed
Corp equipment reserve	25,000	revenue	Corp equipment reserve

765,000

**EXMOOR NATIONAL PARK AUTHORITY
ANALYSIS OF RESERVES**

	Balance 31/03/23	2023/24 Budget Allocations	Projected Transfers (from) Reserves 2023/24	Anticipated Balance 31/03/24	2024/25 Budget Allocations	Projected Balance 01/04/24
	£	£	£	£	£	£
EARMARKED RESERVES						
Conservation of Cultural Heritage						
Ashcombe Garden Restoration	8,743			8,743		8,743
Archaeology	14,670		-4,670	10,000		10,000
Heritage Projects	23,897		-8,000	15,897		15,897
Conservation of Natural Environment						
Deer Monitoring Study	13,424			13,424		13,424
Woodland Mgt Reserve	53,362	30,000	-30,000	53,362	25,000	78,362
Ennis	14,292		-14,292	0		0
Nature Recovery Vision and Monitoring	0	10,000		10,000		10,000
Forward Planning & Communities						
Planning Policy	113,356			113,356		113,356
Caremoor For Exmoor	449,500		-100,000	349,500		349,500
Local Plan	12,283		-5,000	7,283	25,000	32,283
Rural Enterprise	63,218			63,218		63,218
Development Management						
Development of Planning Service	53,259		30,000	83,259		83,259
Promoting Understanding						
National Park Centres spend to save	16,236		-16,236	0		0
Health & Well-being	1,088		-1,088	0		0
Engagement & Outreach	27,738		-10,000	17,738		17,738
Rangers, Estates & Volunteers						
Authority Estate	304,234	40,000	-65,000	279,234	50,000	329,234
Get Involved Programme	1,349		-1,349	0		0
Recreation Management						
Rights of Way	192,452		-30,000	162,452		162,452
Support Services						
IT and Web Development	61,975	21,800	-20,000	63,775		63,775
Corporate Equipment & Vehicle Replacement	172,325	50,000	-67,050	155,275	25,000	180,275
Research & Development	21,901			21,901		21,901
Modernisation	199,306		-100,000	99,306	100,000	199,306
Internship and Trainee Fund	21,293	15,000	-20,000	16,293	20,000	36,293
Corporate & Democratic Core						
Environmental Resilience	50,481		-28,000	22,481		22,481
Partnership Plan Review	0	15,000		15,000	25,000	40,000
Capital Development Reserve	100,000			100,000		100,000
	1,990,382	181,800	-490,685	1,681,497	270,000	1,951,497
PROGRAMMES & PARTNERSHIPS						
Programmes - fixed term	117,635		-30,000	87,635		87,635
Partnership Fund/ small grants scheme	33,099		-15,000	18,099		18,099
	150,734	0	-45,000	105,734	0	105,734
GENERAL FUND AND CONTINGENCIES						
General Fund	354,293			354,293		354,293
Contingency Fund - General	349,966			349,966		349,966
Contingency Fund - Legal	369,500		30,000	399,500		399,500
	1,073,759	0	30,000	1,103,759	0	1,103,759
TOTAL RESERVES	3,214,875	181,800	-505,685	2,890,990	270,000	3,160,990

**Exmoor National Park Authority
 Medium Term Financial Plan 2024/25 - 2028/29**

	2023/24 Original £'000	Previous 2024/25 Projected £'000	Original 2024/25 Projected £'000	Revised 2025/26 Projected £'000	Revised 2026/27 Projected £'000	Revised 2027/28 Projected £'000	Revised 2028/29 Projected £'000
Income							
National Park Grant Income (Defra) - including one off funding	3,211	3,211	3,211	3,211	3,211	3,211	3,211
- Fees - planning,	103	106	116	121	124	127	130
- Fees - car parks	85	90	95	100	105	110	115
- Interest earned	80	30	60	60	60	60	60
- Rents	190	197	197	195	199	203	207
- Contributions	138	138	354	353	360	367	375
- National Park Centre Sales Income	110	113	121	119	122	125	128
- Grants	16	16	16	16	16	16	16
- Rights of Way Income	155	155	155	155	155	155	155
- Pinkery Trading Income	145	150	152	157	162	167	172
- Other	36	36	45	45	45	45	45
Total:	1,058	1,031	1,311	1,321	1,348	1,375	1,403
Total Income	4,269	4,242	4,522	4,532	4,559	4,586	4,614
Expenditure							
Core budget - Pay							
Current Establishment (excluding Pinkery)	2,682	2,816	2,814	2,883	2,942	2,999	3,058
Pension Costs - Fixed Element	75	78	78	78	81	84	87
Target Pay Budget	2,757	2,894	2,892	2,961	3,023	3,083	3,145
Core budget Non-Pay							
Member costs	98	99	96	98	99	100	101
Premises costs	223	226	232	225	228	231	234
Insurance	53	54	57	55	56	57	58
Travel / vehicle costs	98	100	99	100	102	104	106
Equipment	64	65	75	76	77	78	79
Contracted work (e.g. audit fees, legal services)	234	272	262	270	273	276	279
Grants and contributions	7	7	4	0	0	0	0
Subscriptions	22	22	24	24	24	24	24
National Park Centre Cost of Goods Sold	65	67	75	71	73	75	77
Consumables	62	63	60	60	61	62	63
ICT Expenditure	72	73	75	75	76	77	78
Communications	27	28	24	24	25	26	27
Toilet & car park costs	94	95	95	95	96	97	98
Pinkery	145	150	152	157	162	167	172
Total non-pay budget	1,264	1,321	1,330	1,330	1,352	1,374	1,396
Total Core Budget	4,021	4,215	4,222	4,291	4,375	4,457	4,541
Programmes, Partnerships & Contributions to Reserves							
Contributions to Reserves	182	70	270	161	135	115	115
Top Sliced Programmes	66	149	30	30	30	30	30
Partnership Fund - small grants scheme/ Contingency	0	0		50	50	50	50
Total available Programmes & Partnerships Budget	248	219	300	241	215	195	195
Total expenditure	4,269	4,434	4,522	4,532	4,590	4,652	4,736
Savings yet to be identified	0	-193	0	0	-31	-66	-123

EXMOOR NATIONAL PARK AUTHORITY

5 March 2024

EXMOOR NATIONAL PARK AUTHORITY CORPORATE PLAN 2024-25

Report of the Chief Executive and Head of Climate, Nature and Communities

Purpose of Report: To present to Members the draft Exmoor National Park Authority Corporate Plan for 2024-25.

RECOMMENDATIONS: The Authority is recommended to:

- (1) APPROVE the Exmoor National Park Authority Corporate Plan 2024-25 (Appendices 1-3)
- (2) DELEGATE to the Chief Executive and Chairperson authority to agree minor amendments following Member discussion, and production of the final Plan.

Authority Priority: The Corporate Plan outlines the priorities for the Authority for the period to end of March 2025.

Legal and Equality Implications: Section 65(4) Environment Act 1995 – provides powers to the National Park Authority to “do anything which in the opinion of the Authority, is calculated to facilitate, or is conducive or incidental to:-

- (a) the accomplishment of the purposes mentioned in s. 65 (1) [National Park purposes]
- (b) the carrying out of any functions conferred on it by virtue of any other enactment.”

The equality impact of the recommendations of this report has been assessed as follows: There are no foreseen adverse impacts on any protected group(s). Engagement through the outreach work within the plan is designed to have a positive impact on protected groups.

Consideration has been given to the provisions of the Human Rights Act 1998 and an assessment of the implications of the recommendations of this report is as follows: There are no implications for the Human Rights Act.

Financial and Risk implications: No financial or risk implications have been identified. Performance management exerts a positive influence on financial and risk management.

Climate Response: The Corporate plan includes action to respond to the climate emergency.

1. Background

- 1.1 The 2024-25 Corporate Plan sets out the key priorities for the Authority for the next financial year and reflects Government priorities for how National Parks can help to deliver national objectives.
- 1.2 The Authority’s priorities continue to be focused on delivering our two statutory purposes of conserving and enhancing the natural beauty, wildlife and cultural heritage of Exmoor, and promoting opportunities for enjoyment and understanding of its special qualities. In fulfilling these purposes, we are also responding to the

current priorities for the nation which include the nature and climate crises, enabling people from all parts of society to enjoy the National Park, and benefiting the nation's health and wellbeing.

2. Exmoor National Park Authority Corporate Plan 2024-25

- 2.1 This Corporate Plan for 2024-25 has been prepared within the context of a three year Strategy for ENPA 2023-2026 [Key Documents | Exmoor \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk), which gives staff, Members and the public a clear view of our strategic direction for the next three years. It describes our six priorities and the outcomes that we want to achieve. It reflects the emerging themes of the 2024–29 Exmoor National Park Partnership Plan and the priorities identified in Government's response to the Landscapes Review.
- 2.2 The Plan focuses on the six priorities set out in the Corporate Strategy, these are:
1. A clear response to the nature and climate crises
 2. A welcoming place for all, improving people's health and well-being
 3. A cared for landscape and heritage
 4. A place with flourishing, vibrant, communities and businesses
 5. A highly performing Estate, delivering National Park purposes
 6. A great place to work
- 2.3 The focus on these six priorities also helps us to manage the ongoing budgetary and resource constraints that we face. We continue to implement plans that will increase income and bring in external funding to support our work, in addition to the core grant funding we receive from Defra. However, there are still significant funding gaps in the latter years of our Medium-Term Financial Plan which means that we will have to continue to manage our budgets prudently and look to make savings/increase income generation opportunities.
- 2.4 In addition to the list of actions for 2024-25 in Appendix 2, a section has been added at the start of the plan (Appendix 1), setting out in more detail the services that the Authority delivers, and the indicators that are used to measure performance. This is to better reflect the range of work that officers deliver, and to provide a clear link to performance reporting.
- 2.5 As this year's Corporate Plan was being prepared, the Government launched the Protected Landscapes targets and outcomes framework, which includes a number of national targets that Government expects National Parks and National Landscapes to help deliver, along with a range of indicators for monitoring. These are targets for the National Park and are expected to be included in National Park Management Plans. Further work is being undertaken to consider these as part of the current review of the Exmoor National Park Partnership Plan. This will then inform the 2025-26 Corporate Plan, including a review of the indicators used in the Authority's performance management.

3. Monitoring progress

- 3.1 Progress is reported to Leadership Team and Delivery Team on a quarterly basis which enables managers to highlight key achievements and any issues regarding delivery. A six-month progress update is reported to the Authority in December and

at the end of each financial year an annual performance review is completed and reported at the Authority's Annual General Meeting. This provides information about the progress made in delivering the actions in the Corporate Plan, together with achievement against the Authority's set of performance indicators.

Clare Reid

Head of Climate, Nature and Communities

February 2024

Appendix 1: The Role of Exmoor National Park Authority and service delivery

Appendix 2: Corporate Actions 2024-25

Appendix 3: Use of our Resources

ENPA Corporate Plan

The Role of Exmoor National Park Authority and service delivery

What we do to deliver National Park purposes

The Authority delivers a number of core services for visitors, local communities and land managers to fulfil National Park purposes to:

- Conserve and enhance natural beauty, wildlife and cultural heritage, and
- Promote understanding and enjoyment of the special qualities of the National Park.

In carrying out these purposes, the Authority has a duty to promote the socio-economic well-being of local communities.

Our 22 Members have responsibility for setting the strategic direction of the Authority and ensuring we achieve our objectives through effective use of our resources:

- 12 are appointed by the Unitary, County and District Councils with land within the National Park
- 5 are nominated by and elected from the Parish and Town Councils within the National Park
- 5 are appointed by the Secretary of State for Environment, Food and Rural Affairs

Members consider priorities and make decisions relating to our duties as a National Park Authority, including determining planning applications for development on Exmoor. Authority meetings and the Planning Committee are public meetings that anyone can attend.

We employ a team of around 60 core staff but we additionally employ 10-15 project and seasonal staff, deliver through partnerships and through shared services. Our knowledgeable and dedicated staff team are a key resource in ensuring we deliver this Corporate Plan. Working with partners and sharing services not only helps us make the best use of our resources but also benefits all parties through shared learning and understanding.

The Corporate Strategy is closely aligned with the emerging themes for the new Exmoor National Park Partnership Plan 2024-2029 which is currently being prepared and the new Plan will be adopted by the Authority in 2024. This is a statutory Plan for the National Park as a whole: whilst led by the Authority, it is a Plan for everyone who cares about Exmoor, the place, its communities and the benefits the National Park provides to the nation. The Corporate Strategy sets out how the Authority will lead delivery of the Partnership Plan, working with our partnership groups.

Much of what we do would simply not be possible without our partners, local communities, interest groups and volunteers. We are committed to working closely with others to deliver National Park purposes and protect the special qualities of Exmoor. We will continue to develop close working relationships with local businesses and communities alongside our regional and national partners, and provide opportunities for people to get involved in the delivery of our plans.

Delivering our services

Conservation

We deliver advice and develop projects to conserve and enhance Exmoor's landscape, wildlife and cultural heritage, working with farmers, woodland owners, game shoot managers, conservation organisations, the local community and the general public.

We measure our performance by:

- % SSSI land in favourable and unfavourable but recovering condition in the National Park
- % identified sites treated for invasive species
- Number and % of listed buildings and scheduled monuments at risk & number conserved
- % of Conservation Areas with up-to-date appraisals

Access & recreation

We carry out public access management and engagement with land managers and recreational users of the National Park to promote and conserve its special qualities and help to manage the impacts of public recreation on Exmoor's special qualities.

ENPA has devolved responsibility from our local highway authorities for maintenance of our 1000km of public rights of way and associated legal work. We also have statutory responsibility for the 18,000 ha of Access Land on Exmoor, and maintain many permitted paths alongside improvement works, care for promoted routes and other work to help everyone enjoy Exmoor.

We measure our performance by:

- % rights of way open and easy to use (target 80%)
- % of rights of way network inspected
- % reported network faults resolved within 3 months (target 80%)
- Total number of major works completed
- Number of legal orders made (e.g. path diversions and temporary closures)
- Public satisfaction with the rights of way network
- Number of consultations relating to recreational events

Outreach, learning & engagement

We provide formal and informal education, training, volunteer opportunities and greater involvement of new audiences, including health and wellbeing initiatives. This includes our Pinkery Outdoor Education Centre providing residential experiences for schools, and also for hire for private groups, we are the only National Park to offer this service. We provide a wide range of educational day visits as well as outreach work within and beyond the National Park.

We measure our performance by:

- Occupancy levels and number of users at Pinkery Outdoor Education Centre
- Number of Engagement Days for Residential Stays, Day visits and Outreach at Pinkery Outdoor Education Centre
- Number and value of volunteers

- Number of volunteer days attended by ‘under-represented groups’
- Number of people attending events to promote understanding of the National Park
- Number of new audiences engaged

National Park Centres

We run three Centres in Lynmouth, Dulverton and Dunster providing inspiration and information about Exmoor National Park, with interpretive displays, maps, publications and staff with specialist knowledge about the area.

We measure our performance by:

- Number of visitors to National Park Centres
- Net income from National Park Centres and online shop and profit margins
- Spend per visitor in National Park Centres
- Customer satisfaction

Communications

We provide information and interpretation of Exmoor’s special qualities through digital and print media, website, social media, display boards.

We measure our performance by:

- Total social media audience (followers across all channels)
 - o Facebook annual reach & content interactions
 - o Instagram annual reach & content interactions
 - o X (twitter) followers and post impressions
- Number of media articles / interviews across international, national, regional and local outlets
 - o % positive, neutral, negative
- Total website page views and unique users
- Total e-news subscribers (Constant contact)
- Usefulness and quality of publications (from Visitor Surveys completed every 2-3 years)

Planning

ENPA is the local planning authority for the National Park, and is responsible for developing and implementing planning policy through the Local Plan, and ensuring that development is of the right scale, directed to appropriate locations and conserves and enhances the character and appearance of the National Park. This includes determining applications for planning permission, listed building consent, tree preservation orders, as well as taking enforcement action against planning breaches.

We measure our performance by:

- % major applications determined within 13 weeks (target 60%)
- % minor and other applications determined within 8 weeks (target 70%)
- % planning approval (all determined applications)
- % applications registered within target time
- Number of appeals successfully defended

- Number of enforcement cases recorded and number resolved

Rural Enterprise

We engage with the business sector, local communities and with local authority economic development services to help sustain a thriving economy on Exmoor, while maximising the opportunity for businesses to contribute to keeping Exmoor special. There is a particular focus on working with tourism partners to ensure that Exmoor is a leading visitor destination and tourism is promoted and managed sustainably for the benefit of all.

We measure our performance by:

- Value of CareMoor donations, broken down by % from:
 - o businesses
 - o legacies & large gifts (+£1k)
 - o personal donations
 - o events & fundraising
- Number of CareMoor champions
- Number of Park Partners

Estate and Facilities

ENPA owns 4,586 hectares of land (around 7% of the National Park), comprising mostly open moorland, along with 553 hectares of woodland. The estate also includes a number of buildings, including its head office – Exmoor House, National Park Centres, a field services Depot at Exford, an outdoor education centre at Pinkery, an historic farmstead, other historic assets as well as a number of ancillary properties. Such a large estate is unusual amongst National Park Authorities within the UK, but for a small National Park Authority, it is unique. We manage Authority land for landscape, wildlife, historic environment and recreation benefits, which also provides opportunities to demonstrate best practice and emerging land management techniques. We also maintain and improve Authority owned public facilities including picnic sites, toilets and car parks to provide a positive experience for visitors and locals accessing and enjoying the National Park.

We measure our performance by:

- Condition of SSSIs in ENPA ownership (% in favourable and unfavourable but recovering condition)
- % identified sites in ENPA ownership treated for invasive species
- % of ENPA woodland under appropriate management (with current Forestry Commission approved UK Forestry Standard long-term plan)
- Amount and value of ENPA timber harvested
- Number and % of Scheduled Monuments / Listed Buildings in ENPA ownership at risk and number conserved

Corporate and governance

The operational running of the organisation is supported through HR, Finance, ICT, GIS, Corporate Planning, Administration and Governance.

We measure our performance by:

- % change in annual GHG emission from ENPA operations
- Sickness absence levels

- Total number of staff accidents and number reportable to the Health & Safety Executive
- Number of formal complaints received
- % undisputed invoices paid within 30 days
- Average time to respond to ICT help-desk queries
- Total amount of external income brought in

Corporate Actions 2024-25

In addition to our ongoing service delivery, we identify a number of actions that will be undertaken during the year. These include a mix of priority actions for the Authority, those relating to business change, and actions relating to specific projects.

Cross-cutting Actions	
1.	Priority action: Consult on and adopt the National Park Partnership Plan 2024-2029
2.	Priority action: Submit final application for the 5 year 'Exmoor Pioneers' programme, and if successful begin delivery, including nature recovery, heritage conservation, skills, volunteering, engagement with new audiences and interpretation. This programme is funded by the National Heritage Lottery Fund, the Cynthia Hadley legacy (CareMoor for Exmoor) and BMW.
3.	Priority action: Deliver the Defra-funded Farming in Protected Landscapes programme on Exmoor, supporting farmers to transition to the new environmental land management schemes. Target: allocate £700,000 of funds in 2024-25
4.	Priority action: Develop overall strategy for income generation, being more commercial across our activities. Update and implement the External Project Funding strategy and Prospectus, and pursue funding opportunities for projects
5.	Priority action: Initiate 2-year Development Phase of the 'Reviving Exmoor's Heartlands' Landscape Recovery programme
6.	Priority action: Progress plans for Driver <ul style="list-style-type: none"> • Implement capital works programme for the house • Apply for national Farming in Protected Landscapes funding for repairing the traditional barn • Develop and confirm the operating model, and • Begin delivery of Countryside Stewardship scheme
Corporate Priority 1: A clear response to the nature and climate crises	
7.	Work with the Local Nature Partnerships to input to the Somerset and Devon Local Nature Recovery Strategies, including local habitat mapping, identifying priorities and opportunities for enhancing biodiversity
8.	Continue to develop landscape scale proposals for the Exmoor coast, to take forward ambitions set out in the Nature Recovery Vision, including: <ul style="list-style-type: none"> • Developing plans for ENPA Estate within the National Trust Holnicote Landscapes Recovery project

<ul style="list-style-type: none"> Developing ideas for a cross-boundary coastal project for National Lottery Protected Landscapes funding with North Devon Coast and Quantock Hills National Landscapes
9. <u>New action</u> : Investigate the impact of atmospheric pollution on Exmoor's designated wildlife sites and develop a strategy to mitigate and manage these impacts
10. Deliver the 2 nd year of the Sowing the Seeds project funded by Farming in Protected Landscapes programme and explore ongoing funding. Target: 300 ha of meadows established
11. Work with partners to progress species recovery projects including the Two Moors Pine Marten Project, and marsh fritillary and water vole as part of the Landscape Recovery Scheme and Exmoor Pioneers project
12. <u>New action</u> : With support from the RSPB, deliver the Exmoor Moorland Breeding Bird Survey covering all Section 3 moorland and including SSSI condition monitoring where breeding bird assemblages are included
13. Implement the Exmoor Non-Native Invasive Species (ENNIS) Project funded by FiPL. Consider future priorities for non-native species control, and future funding routes including through Countryside Stewardship. Target: treat or monitor 70% of sites that can be treated using herbicide. Conduct at least two treatments on all Rootwave trial sites
14. Work with Natural England on SSSI monitoring programme for North Hill in 2024, and agree a programme for remaining SSSIs with target completion by 2028
15. Support peatland restoration working with the South West Peatland Partnership, including offering support and advice and employing the Historic Environment Officer
16. Continue delivery of 'Exmoor's Temperate Rainforest' project by increasing tree cover in combes around Simonsbath, including the creation of Kings Wood and delivery of the 'Recharge in Nature' project funded by BMW.
17. Work with partners to support delivery of national ambitions for appropriate woodland expansion, increasing canopy cover and management of existing trees and woodland to ensure resilient wooded landscapes delivering a range of public goods
18. Work with Somerset Wildlife Trust, Somerset Council and National Landscapes on year two of the "Forest for Somerset" partnership funded by the Woodland Creation Accelerator Fund (WCAF). The project aims to expand and connect trees and woodlands across Somerset; embed trees and woodlands as part of the green economy; protect and improve existing trees and woodlands; and connect people with trees and woodlands. Work with Somerset Council, Regional and National Partners to submit a New Forest for the Nation Bid. Target: support the creation of 240ha new woodland pa across Somerset
<p>19. Priority action: Continue to deliver actions in the ENPA Climate action plan to achieve carbon neutral ENPA by 2030:</p> <ul style="list-style-type: none"> Implement building decarbonisation options at Driver Farm and explore farm carbon toolkit

- Explore woodland carbon toolkit to develop best practice in line with Woodland Estate performance and actions to expand woodland and tree cover. **Target: trial revised forestry contract specifications and management as appropriate to align with recommended actions for 24/25 work season**
- Continue to replace ENPA fleet vehicles with electric vehicles. **Target: One this year**
- Continue to pursue carbon offsetting opportunities on ENPA Estate including woodland creation and peatland restoration
- Complete replacement of lighting at National Park Centres with LEDs
- Install EV charging points at ENPA car parks utilising BMW funding. **Target: Two this year**

20. New action: Work with UK National Park Authorities to join Race to Zero and develop action plan.

21. **Priority action: Commission a climate adaptation and risk assessment for Exmoor National Park to feed into the Partnership Plan and action planning.**

Corporate Priority 2: A welcoming place for all, improving people's health and well-being

22. **Priority action: Deliver an inspiring and inclusive learning and engagement programme, reaching out to people from a wider range of backgrounds and providing opportunities for increased connection to Exmoor's special qualities. Including, if funding successful, Young Rangers programme and Generation Green 2. Target: diversify formal education offer (day and residential visits) by attracting three new schools from target audiences.**

23. Develop and deliver a volunteer strategy to promote and support a wide range of volunteering opportunities within Exmoor, with a particular focus on removing barriers to engagement. Audit existing volunteer demographics and opportunities and develop links between volunteering and other areas of work including Young Rangers and health and well-being work.

24. Promote the health and well-being benefits that Exmoor provides by delivering the 'Nature prescriptions' project; further developing and delivering our "Welcome to Exmoor" days as part of Exmoor Pioneers; and working with partners to actively remove the barriers to targeted groups accessing Exmoor for their health and wellbeing. **Target: deliver eight Welcome to Exmoor days**

25. Complete relocation of Dulverton National Park Centre to Exmoor House and continue to maximise NPCs' contribution to National Park purposes and income generation. Develop and deliver a revised Retail Strategy. **Target: 5% increase in net spend whilst maintaining 40% margins**

26. Continue to expand the Authority's online shop, including integrated marketing alongside core ENPA messages, to generate increased income and engagement with the National Park. **Target: 5% increase in gross profit year on year**

27. Assist with visitor management in the National Park (including popular locations and large events) to ensure that visitors are able to enjoy Exmoor responsibly and sustainably
28. Priority action: Maintain a safe rights of way and access network with resources focused on the most popular routes to ensure the majority of users enjoy a high-quality experience. Ensure that any works help to make the network more resilient to climate change and to meet the needs of all users. Target: open and easy to use score above 80%.
29. Deliver business change in our Public Access and Field Services Team work – including revised processes and charging to adapt to reduced funding and realignment of staff priorities
30. Deliver year 3 of Defra special funding to improve disability access infrastructure relating to routes, facilities, equipment, signage, and supporting information
31. Open and celebrate the England Coast Path
32. Implement enhancement works for ENPA car parks with a focus this year on Haddon Hill and Exford
33. Complete the construction of Great Bradley Bridge. Carry out preparatory work and scoping to replace Hinds Pitt Bridge (Tarr Steps Circuit)
34. New action: Work with Visit Exmoor to ensure Exmoor is adequately represented within emerging Local Visitor Economy Partnerships, (LVEPs) accredited by VisitEngland
35. Work with the Exmoor Tourism Network to develop a shared good tourism plan
36. New action: Complete Exmoor Visitor Survey and publish results
37. New action: Scope the establishment of an Exmoor Nature Festival, for potential launch in May 2025
Corporate Priority 3: A cared for landscape and heritage
38. Continue the restoration of Ashcombe Gardens with volunteers. Fundraise for new bridges to improve access
39. Review the management of Ashley Combe in the light of recommendations from Bristol University to continue restoration of the designed landscape
40. Engage people in Exmoor's dark skies through delivery of the 2024 Dark Skies Festival. Work with the Exmoor Dark Skies steering group to develop a community engagement project with grant funding for community lighting actions to target priority areas to reduce light pollution
41. Draft and consult on a Design Supplementary Planning Document to encourage high quality, locally distinctive design and take account of national design guidance /code

42. Work with volunteers to build understanding of Exmoor's heritage assets, undertake condition surveys on ENPA's Estate within the Royal Forest, and complete a programme of assessment of Exmoor's Scheduled Monuments and local heritage list sites, funded through Exmoor Pioneers. Target: complete condition surveys on ENPA owned sites on the royal forest
43. Progress work on Conservation Area appraisals, new designations, guidance for homeowners, and Article 4 directions. Target: Apply Article 4 Directions to Conservation Areas along with homeowner guidance.
44. Maintain the Historic Environment Record (HER)
Corporate Priority 4: A place with flourishing, vibrant, communities and businesses
45. Support businesses and partners to deliver the Rural Enterprise Exmoor vision
46. Promote philanthropic giving via CareMoor for Exmoor with a focus on promoting legacy opportunities. Target: Increase general donations (excluding large gifts over £1,000) by 5%.
47. Work with partners to support increased use and promotion of local produce including further roll out of Eat Exmoor branding and supporting the delivery of the 2024 Exmoor Young Chef Competition
48. Through ENPA's planning role, oversee implementation of the Local Plan and work in partnership to support delivery of locally needed affordable housing and produce guidance. Prepare for the review of the Local Plan
49. Priority action: Deliver the National Park Planning service, maintaining performance within targets of 60% major applications and 70% of minor applications determined on time. Utilise Planning Delivery Skills funding to address the planning backlog
50. Implement the new statutory Biodiversity Net Gain requirements through development management
51. Continue to implement improvements to digitise the National Park planning service in line with government objectives to make the planning process more accessible <ul style="list-style-type: none"> • Explore options for a new planning database • Work with Land Registry to provide digital access to local land charges.
52. Update the local list of requirements for validating planning applications by end of Q2
Corporate Priority 5: A highly performing Estate, delivering National Park purposes
53. Priority action: Progress the ENPA Estate Strategy with a particular focus this year on: <ul style="list-style-type: none"> • Implementing plans of Driver Farm (see action 6) • Preparing management plans for specific sites including baseline surveys • Progress plans for reuse of 7-9 Fore St

• **Progress planned disposal of assets as approved by Members**

54. Continue exemplary management of ENPA woodland estate including continuous cover productive woodland, managing woodland of high biodiversity value, climate resilience and adaptation for priority species and tree safety. Continue to develop the tree nursery to self-supply planting, restocking, adaptation needs. Introduce low-carbon practices into management

55. Help promote and conserve the iconic Exmoor Pony breed through management of the Authority's pony herds

Corporate Priority 6: A great organisation to work for

56. **Priority action: Implement the Organisational Development Strategy to support our staff team and enable the best use of our knowledge, skills, and experience in delivering National Park purpose. The focus this year will be on updating ENPA's values, reflecting on our culture and reconnecting with each other and the priorities of the organisation through internal communications, staff events and training. We will complete the actions in the Organisational Development Strategy for 2023 and progress the actions for 2024**

57. Take positive action to support the Authority's commitment to Equity, Diversity, and Inclusion. Specific focus this year on adopting an EDI strategy and developing action plans for teams. Adopt EDI strategy and raise awareness amongst staff and Members through guidance and training

58. New action: Formulate an overarching ENPA External Communications Strategy – focusing on our role for the place – identifying key messages, audiences and channels:

- Plan and develop regular Exmoor Park Life (*name tbc*) e-news
- Evolution of current Exmoor Parish and Consultative Forum to a twice-yearly National Park Forum (*name tbc*).
- Maximise PR opportunities associated with our 70th anniversary

59. Fully integrate Risk Management with Performance Management through the mapping of risks to corporate objectives and risk rate performance delivery of objectives. Once mapped, each strategic risk will be assessed to enable the Authority to determine its risk appetite

60. Fully implement the new ESRI Geographical Information System (GIS). Use ESRI products to provide a user-friendly interface creating immersive experiences, maintaining and enhancing our online web-based platform for Planning, Public Rights of Way or Natural Environment Record. Utilise ESRI tools to help staff perform data capture and editing, find assets and information.

Appendix 3

Use of our Resources

The summary Medium-Term Financial Plan (MTFP) set out below provides a projection of ENPA income and expenditure for 2024/25 through to 2028/29.

We continue to work within an annual grant allocation from Defra. We do not know what funding we will receive in future years, but the MTFP assumes zero growth in National Park Grant from 2024/25 onwards. Whatever funding is provided, the Authority will work hard to use the resources available to implement the Partnership Plan and work with Defra to deliver their priorities for England's National Parks.

Exmoor National Park Authority

Medium Term Financial Plan 2024/25 - 2028/29

	2023/24 Original £'000	Previous 2024/25 Projected £'000	Original 2024/25 Projected £'000	Revised 2025/26 Projected £'000	Revised 2026/27 Projected £'000	Revised 2027/28 Projected £'000	Revised 2028/29 Projected £'000
Income							
National Park Grant Income (Defra) - including one off funding	3,211	3,211	3,211	3,211	3,211	3,211	3,211
- Fees - planning,	103	106	116	121	124	127	130
- Fees - car parks	85	90	95	100	105	110	115
- Interest earned	80	30	60	60	60	60	60
- Rents	190	197	197	195	199	203	207
- Contributions	138	138	354	353	360	367	375
- National Park Centre Sales Income	110	113	121	119	122	125	128
- Grants	16	16	16	16	16	16	16
- Rights of Way Income	155	155	155	155	155	155	155
- Pinkery Trading Income	145	150	152	157	162	167	172
- Other	36	36	45	45	45	45	45
Total:	1,058	1,031	1,311	1,321	1,348	1,375	1,403
Total Income	4,269	4,242	4,522	4,532	4,559	4,586	4,614

	2023/24 Original £'000	Previous 2024/25 Projected £'000	Original 2024/25 Projected £'000	Revised 2025/26 Projected £'000	Revised 2026/27 Projected £'000	Revised 2027/28 Projected £'000	Revised 2028/29 Projected £'000
Expenditure							
Core budget - Pay							
Current Establishment (excluding Pinkery)	2,682	2,816	2,814	2,883	2,942	2,999	3,058
Pension Costs - Fixed Element	75	78	78	78	81	84	87
Target Pay Budget	2,757	2,894	2,892	2,961	3,023	3,083	3,145
Core budget Non-Pay							
Member costs	98	99	96	98	99	100	101
Premises costs	223	226	232	225	228	231	234
Insurance	53	54	57	55	56	57	58
Travel / vehicle costs	98	100	99	100	102	104	106
Equipment	64	65	75	76	77	78	79
Contracted work (e.g. audit fees, legal service)	234	272	262	270	273	276	279
Grants and contributions	7	7	4	0	0	0	0
Subscriptions	22	22	24	24	24	24	24
National Park Centre Cost of Goods Sold	65	67	75	71	73	75	77
Consumables	62	63	60	60	61	62	63
ICT Expenditure	72	73	75	75	76	77	78
Communications	27	28	24	24	25	26	27
Toilet & car park costs	94	95	95	95	96	97	98
Pinkery	145	150	152	157	162	167	172
Total non-pay budget	1,264	1,321	1,330	1,330	1,352	1,374	1,396
Total Core Budget	4,021	4,215	4,222	4,291	4,375	4,457	4,541
Programmes, Partnerships & Contributor							
Contributions to Reserves	182	70	270	161	135	115	115
Top Sliced Programmes	66	149	30	30	30	30	30
Partnership Fund - small grants scheme/ Contingency	0	0		50	50	50	50
Total available Programmes & Partnerships Budget	248	219	300	241	215	195	195
Total expenditure	4,269	4,434	4,522	4,532	4,590	4,652	4,736
Savings yet to be identified	0	-193	0	0	-31	-66	-123
Percentages							
Target Pay Budget as % of NPG	86%	90%	90%	92%	94%	96%	98%
Total non-pay Budget as % of NPG	38%	38%	41%	41%	42%	43%	43%
Pro & Part Budget as % of NPG	8%	7%	9%	8%	7%	6%	6%
Target Pay Budget as % of Total Income	65%	68%	64%	65%	66%	67%	68%
Total non-pay Budget as % of Total Income	30%	31%	29%	29%	30%	30%	30%
Pro & Part Budget as % of Total Income	6%	5%	7%	5%	5%	4%	4%
Reserves							
woodlands	30,000		25,000				
R & D (Local Plan & Partnership Plan)	25,000	-	50,000	50,000	25,000	25,000	25,000
IT	21,800	-	-	-	-	-	-
Corporate Equipment & Vehicle Replacemer	50,000	50,000	25,000	25,000	25,000	25,000	25,000
Internship and Trainee Fund	15,000	20,000	20,000	16,000	15,000	15,000	15,000
Modernisation	-	-	100,000	20,000	20,000	-	-
Estates - various	40,000		50,000	50,000	50,000	50,000	50,000
	181,800	70,000	270,000	161,000	135,000	115,000	115,000
LESS: Top sliced Programmes							
Contingency		100,000					
Tourism	10,000	10,000	10,000	10,000	10,000	10,000	10,000
Potential Pinkery overspend	20,000	15,000	-	-	-	-	-
Hill Farm Network	15,000	10,000	5,000	5,000	5,000	5,000	5,000
HLF Bid	7,000						
Website Development	5,000	5,000	5,000	5,000	5,000	5,000	5,000
SERC/DBRC Bio-records	5,000	5,000	5,000	5,000	5,000	5,000	5,000
STEAM	4,000	4,000	5,000	5,000	5,000	5,000	5,000
	66,000	149,000	30,000	30,000	30,000	30,000	30,000

ENPA Budget 2024/25

Section	Budget Heading	2023/24 Original Budget £	2024/25 Expenditure £	2024/25 Income £	2024/25 Original Budget £	Variance between 24/25 Original and 23/24 Original Budgets	Notes
Conservation of Cultural Heritage	Archaeology & Historic Environment	89,100	106,400	-1,200	105,200	16,100	
Conservation of Cultural Heritage Total		89,100	106,400	-1,200	105,200	16,100	
Conservation of Natural Environment	Woodlands	61,100	112,800	-44,000	68,800	7,700	23/24 included LT post, 24/25 income is £90k Grant Funding
	Conservation Advice	268,500	219,300	-90,000	129,300	-139,200	
Conservation of Natural Environment Total		329,600	332,100	-134,000	198,100	-131,500	
Forward Planning & Communities	Planning & Community	87,400	100,400	0	100,400	13,000	
	Rural Enterprise	117,500	125,600	0	125,600	8,100	
Forward Planning & Communities Total		204,900	226,000	0	226,000	21,100	
Development Management	Development Management	336,800	430,800	-116,000	314,800	-22,000	Removal of LT post and reorganisation of staffing
Development Management Total		336,800	430,800	-116,000	314,800	-22,000	
Promoting Understanding	National Park Centres	163,600	327,300	-139,500	187,800	24,200	Removal of Lynmouth Pavilion Rent to Estates, Impact of BR changes Cost centre was interpretation management in 23/24 staff changes 2023/24 Included Volunteer Engagement element
	Grants and Contributions	7,200	3,700	0	3,700	-3,500	
	Pinkery	0	151,800	-151,500	300	300	
	Media & Communication	160,400	114,200	-16,000	98,200	-62,200	
	Education & Interpretation	108,600	117,100	-24,000	93,100	-15,500	
Promoting Understanding Total		439,800	714,100	-331,000	383,100	-56,700	
Rangers, Estates & Volunteers	Rangers	82,700	186,600	-58,000	128,600	45,900	Assistant FT Ranger post brought into core establishment
	Field Services	275,800	287,300	-63,500	223,800	-52,000	2 long term vacant posts removed from establishment
	Estates	-131,700	195,800	-391,000	-195,200	-63,500	CS income in relation to Driver Farm
	Volunteer Engagement	0	68,600	0	68,600	68,600	Previously within Education & Interpretation
Rangers, Estates & Volunteers Total		226,800	738,300	-512,500	225,800	-1,000	
Recreation Management & Transport	Access & Recreation	78,300	143,800	-61,000	82,800	4,500	
	Visitor Facilities	9,400	95,400	-95,000	400	-9,000	
Recreation Management & Transport Total		87,700	239,200	-156,000	83,200	-4,500	
Support Services	Finance	134,200	154,900	-60,000	94,900	-39,300	Removal of LT post offset by increased investment interest budget
	Human Resources & Performance	266,800	171,100	0	171,100	-95,700	Removal of LT post, Comms officer to Media & Communications
	ICT & GIS Services	249,400	252,100	0	252,100	2,700	
	Legal Services	70,000	70,000	0	70,000	0	
	Facilities	180,600	188,600	0	188,600	8,000	
Support Services Total		901,000	836,700	-60,000	776,700	-124,300	
Corporate & Democratic Core	Corporate Management	154,500	405,500	0	405,500	251,000	Includes Leadership Team posts (previously within services)
	Historic Pensions Contributions	78,400	78,400		78,400	0	
	Corporate Subscriptions	16,800	18,500		18,500	1,700	
	Members	98,300	96,200	0	96,200	-2,100	
Corporate & Democratic Core Total		348,000	598,600	0	598,600	250,600	
Core Funding & Partnership Fund	National Park Grant	-3,211,500	0	-3,211,500	-3,211,500	0	
	Reserves Transactions	193,800	270,000		270,000	76,200	Appendix 3
	Partnership Fund Top-Sliced	54,000	30,000		30,000	-24,000	Appendix 3
Core Funding & Partnership Fund Total		-2,963,700	300,000	-3,211,500	-2,911,500	52,200	
Total Core Budget		0	4,522,200	-4,522,200	0	0	

EXMOOR NATIONAL PARK AUTHORITY

5 March 2024

TREASURY MANAGEMENT STRATEGY STATEMENT 2024/25

Report of the Chief Finance Officer

Purpose of Report: To remind Members of the requirements of the CIPFA Prudential and Treasury Management Codes, and the Local Government Act 2003 Guidance on Investments, and to adopt the proposed Treasury Management Strategy for 2024/25.

RECOMMENDATION: The Authority is recommended to:

- (1) NOTE the report of the Chief Finance Officer.
- (2) APPROVE the proposed Treasury Management Strategy for 2024/25 as set out in sections 2 and 3 of this report.
- (3) NOTE the Prudential Indicators for 2024/25 to 2026/27 as set out in section 4 of this report (Although some are currently set at zero, all Treasury Management indicators are included for completeness of information and others may well be used in the future).

Authority Priority: Achieve Best Value from our resources and improve our performance. A highly performing Estate, delivering National Park Purposes.

Legal and Equality Implications: The Local Government Act 2003 (LGA 2003), specifically Guidance under Section 15(1)(a) 3rd Edition, effective from 1st April 2018.

The CIPFA Treasury Management in the Public Services: Code of Practice and Cross-Sectoral Guidance Notes: Revised 2021 Edition (CIPFA TM Code).

The CIPFA Prudential Code for Capital Finance in Local Authorities: Revised 2021 Edition (CIPFA Prudential Code).

Financial and Risk Implications: Interest from investments forms part of the revenue income of the Authority. This income is impacted by the market fluctuations in interest rates. As from 1st April 2023 the Authority's cash was aggregated with that of the newly formed Somerset Council. Somerset Council invest sizeable sums into the London Money Market in its name only. ENPA will receive the interest rate that is achieved by Somerset Council on its cash investments, minus 5 basis points. For this, Somerset Council will assume the risk to capital of counterparty default, but any loss of interest would reduce the overall return of the cash balances.

1. Introduction and Background

- 1.1 Treasury management is the management of the Authority's cash flows, borrowing and treasury investments, and the associated risks. The Authority has no debt but has investments that averaged over £3.1m for the year to date and is therefore exposed to financial risks including the loss of invested funds and the revenue effect of changing interest rates. The successful identification, monitoring and control of financial risks are therefore central to the Authority's prudent financial management.

- 1.2 Treasury risk management at the Authority is conducted within the framework of the CIPFA Treasury Management in the Public Services: Code of Practice 2021 Edition (the CIPFA Code) which requires the Authority to approve a treasury management strategy before the start of each financial year. This report fulfils the Authority's legal obligation under the Local Government Act 2003 to have regard to the CIPFA Code.
- 1.3 Under Section 3 of the LGA 2003 (duty to determine affordable borrowing limit), a Local Authority must have regard to the CIPFA Prudential Code. This code requires the setting of a number of Prudential Indicators, benchmarks within which Treasury and Investment Management, and Capital Financing are managed. The setting of Prudential Indicators for Treasury Management requires Authorities to recognise key implications of their borrowing and investment strategies. These relate to the affordability of overall borrowing limits, the maturity structure of borrowing, and longer-term investments.
- 1.4 In formulating the Treasury Management Strategy, and the setting of Prudential Indicators, Exmoor National Park Authority (ENPA) adopts the Treasury Management Framework and Policy recommended by CIPFA. These can be found in Appendix A.

External Context

- 1.5 The impact on the UK from higher interest rates and inflation, a weakening economic outlook, an uncertain political climate due to an upcoming general election, together with war in Ukraine and the Middle East, will be major influences on the Authority's treasury management activity for 2024/25.
- 1.6 The Bank of England (BoE) increased Bank Rate to 5.25% in August 2023, before maintaining this through to December. At the December meeting, members of the BoE's Monetary Policy Committee voted 6-3 in favour of keeping Bank Rate at 5.25%. The three dissenters wanted to increase rates by another 0.25%.
- 1.7 Office for National Statistics (ONS) figures showed CPI inflation was 3.9% in November 2023, down 0.7% from the previous month and below expectations of 4.3%. Looking ahead, using the interest rate path implied by financial markets, the BoE expects CPI inflation to continue falling, but taking until early 2025 to reach the 2% target.
- 1.8 ONS figures showed the UK economy shrank by 0.3% between July and September 2023. The BoE forecasts GDP will likely increase modestly by 0.1% in Q4, a deterioration in the outlook compared to the August MPR. The BoE forecasts that higher interest rates will constrain GDP growth, which will remain weak over the entire forecast horizon.
- 1.9 The labour market appears to be loosening, but only very slowly. The unemployment rate rose slightly to 4.2% between June and August 2023, from 4.0% in the previous 3-month period, but the lack of consistency in the data between the two periods made comparisons difficult. Earnings growth remained strong, with regular pay (excluding bonuses) up 7.8% over the period and total pay (including bonuses) up 8.1%. Adjusted for inflation, regular pay was 1.1% and total pay 1.3%.
- 1.10 Having increased its key interest rate to a target range of 5.25-5.50% in August 2023, the US Federal Reserve paused in September, November, and December, maintaining the Fed Funds rate target at this level. It is likely this level represents the peak in US rates.
- 1.11 Eurozone inflation has declined steadily since the start of 2023, falling to an annual rate of 2.9% in October 2023. Economic growth has been weak, and GDP was shown to have contracted by 0.1% in the three months to September 2023. In line

with other central banks, the European Central Bank has been increasing rates, taking its deposit facility, fixed rate tender, and marginal lending rates to 3.75%, 4.25% and 4.50% respectively.

- 1.12 Although UK inflation and wage growth remain elevated, the Council's treasury team forecasts that Bank Rate has peaked at 5.25%. The Bank of England's Monetary Policy Committee will cut rates in the medium term to stimulate the UK economy but will be reluctant to do so until it is sure there will be no lingering second-round effects. Rate cuts are forecast from Q3 2024 to a low of around 3% by early to mid-2026.

Internal Context

- 1.13 As at 31st December 2023 ENPA had no external debt. The investments of ENPA as at 31st December 2023 stood at just over £2.89m

	Balance on 31/03/2023 £000	Rate as at 31/03 %	Balance on 31/12/2023 £000	Rate as at 31/12 %	Average Balance YTD £000
Balances / Rates	2,302	4.25	2,891	5.33	3,141

- 1.14 In receiving funding for its functions, the National Park Authority effectively turns over approximately £6.5m a year. This represents significant cash movements, and it is important that the Authority has strategies and policies in place to manage such turnover effectively.

- 1.15 The Authority currently manages its investments and cash flow via service arrangements with the Finance and Treasury Management sections of Somerset Council. In so doing it needs to adopt policies consistent with the Council's. The Authority is, however, formally separated with its own bank accounts, and it is therefore important that it adopts a Strategy of its own, albeit following very closely that of Somerset Council.

2. Borrowing Strategy

- 2.1 The Authority is currently debt free. Any potential borrowing would be driven by the capital plan. There are no plans that would necessitate borrowing during 2024/25. As stated in previous strategy statements, when future borrowing is agreed, and Prudential Indicators set, the Chief Finance Officer will make specific decisions with regard to the timing of any borrowing and the length of maturities. Borrowing would be undertaken to minimise borrowing costs and would be consistent with the Authorities' Prudential Indicators.
- 2.2 The Chief Finance Officer has the delegated power to raise capital finance from such sources as is deemed appropriate within the statutory limitations that apply to the Authority. These are termed 'borrowing instruments' and include: -
- PWLB loans – Fixed or Variable
 - Transferable loan instruments
 - Non-transferable loan instruments
 - Local bonds
 - Other (e.g. commercial loan)
 - Bank overdraft
- 2.3 Sources of borrowing: For such long-term funding as may be required, the most likely source would be the Public Works Loan Board (PWLB). Short-term borrowing will be

sought via Somerset Council from the money market direct from lenders or from the Authority's bankers in the form of overdraft or otherwise. Internal resources may be used in lieu of external borrowing, and leasing or soft loans will form an alternative to borrowing where appropriate. No new borrowing will be in the form of LOBOs.

2.4 Debt rescheduling: The Authority is currently debt free.

3. Investment Strategy

3.1 In 2018, the MHCLG (now DLUHC) issued revised Statutory Guidance on Local Government Investments (3rd Edition). It states "Investments made by local authorities can be classified into one of two main categories:

- Investments held for treasury management purposes; and
- Other investments.

3.2 "Where local authorities hold treasury management investments, they should apply the principles set out in the Treasury Management Code. They should disclose that the contribution that these investments make to the objectives of the local authority is to support effective treasury management activities. The only other element of this Guidance that applies to treasury management investments is the requirement to prioritise Security, Liquidity and Yield in that order of importance".

3.3 This strategy applies only to investments held for treasury purposes. Any non-treasury investments would be dealt with in a separate Investment Strategy.

3.4 The Authority's current arrangement with Somerset Council for the provision of treasury management services includes investment management. As from 1st March 2023 there has been no Comfund. All the Authority's cash has been aggregated with that of the newly formed Somerset Council. Somerset Council invests sizeable sums into the London Money Market in its name only. ENPA will receive the interest rate that is achieved by Somerset Council on its cash investments, minus 5 basis points. For this, Somerset Council assumes the risk to capital of counterparty default, but any loss of interest would reduce the overall return of the cash balances.

3.5 Strategy: With the new arrangements in place with Somerset Council, there will be no need to identify separate pots of cash. All funds will be invested within the Somerset portfolio and will receive the rate achieved minus 5 basis points.

3.6 Credit rating: As Somerset Council will be the only counterparty to the Authority there is no need for specific policies or procedures regarding counterparty creditworthiness, to be set out in this strategy. Full details of the Somerset Council counterparty policy and procedures will be available on their website when approved by Full Council. For information the current 2023-24 Somerset Council counterparty criteria is included at Appendix B.

3.7 Somerset Council has constructed and will maintain a counterparty list based on the criteria set out in Appendix B. The minimum credit quality is proposed to be set at A- or equivalent. The credit standing of institutions (and issues if used) will be monitored and updated on a regular basis.

3.8 Somerset Council will continuously monitor counterparties creditworthiness. All three credit rating agencies' websites will be visited frequently, and all ratings of proposed counterparties will be subject to verification on the day of investment. (DLUHC guidance states that a credit rating agency is one of Standard & Poor's, Moody's Investor Services Ltd, and Fitch Ratings Ltd). All ratings of currently used counterparties will be reported to senior finance officers of Somerset Council monthly.

- 3.9 New counterparties must be approved by the Somerset Council Section 151 Officer (Executive Director of Finance & Corporate Resources) before they are used. Any changes to ratings that put the counterparty below the minimum acceptable credit quality whilst SC have a deposit, or a marketable instrument will be brought to the attention of the SC Section 151 Officer immediately, and an appropriate response decided on a case-by-case basis. Sovereign credit ratings will be monitored and acted on as for financial institution ratings. Investment limits are set by reference to the lowest published long-term credit rating from the three rating agencies mentioned above. Where available, the credit rating relevant to the specific investment or class of investment is used, otherwise the counterparty credit rating is used.
- 3.10 Other information on the security of investments: SC understands that credit ratings are good, but not perfect predictors of investment default. Full regard is therefore given to other available information on the credit quality of the organisations in which it invests, including those outlined below.
- Credit Default Swaps and Government Bond Spreads.
 - GDP and Net Debt as a Percentage of GDP for sovereign countries.
 - Likelihood and strength of Parental Support.
 - Banking resolution mechanisms for the restructure of failing financial institutions, i.e. bail-in.
 - Market information on corporate developments and market sentiment towards the counterparties and sovereigns.
 - Underlying securities or collateral for 'covered instruments'.
 - Other macroeconomic factors

4. Prudential and Treasury Management Indicators

- 4.1 The Authority measures and manages its exposures to treasury management risks using the following indicators.
- 4.2 Authored limit and Operational Boundary: The Authority is required to set an authorised limit for total external debt, gross of investments, separately identifying borrowing from other long-term liabilities. The Authority is also required to set an operational limit separately identifying borrowing from other long-term liabilities. This prudential indicator is referred to as the operational boundary. They are both set for the forthcoming, and the following two years. The authorised limit will, in addition, need to provide headroom over and above the operational boundary sufficient for example to accommodate unusual cash movements. A contingency limit of £100,000 has been set for each.

	2024/25	2025/26	2026/27
	£000	£000	£000
Authorised limit			
Borrowing	100	100	100
Operational boundary			
Borrowing	100	100	100

- 4.3 Maturity Structure of Borrowing: The Authority has set for the forthcoming year, both the upper and lower limits with respect to the maturity structure of its borrowing.

	Upper Limit	Lower Limit
Under 12 months	100%	0%
>12 months and within 24 months	100%	0%
>24 months and within 5 years	100%	0%
>5 years and within 10 years	100%	0%
>10 years	100%	0%

4.4 Principal sums invested for periods longer than a year: The purpose of this indicator is to control the Authority's exposure to the risk of incurring losses by seeking early repayment of its investments. As all investments are with SC and ENPA have immediate access to all funds, an indicator of zero is appropriate.

	2024/25	2025/26	2026/27
	£m	£m	£m
Prudential Limit for principal sums invested for periods longer than 1 year	0	0	0

4.5 Credit Risk Indicator: All of the Authority's investments are placed with SC, as a result the Authority do not believe that adopting a credit risk indicator would be appropriate.

4.6 Liability Benchmark: A new prudential indicator, the liability benchmark has been introduced, but as ENPA has no debt and all investments are in effect instant access, this indicator is irrelevant for ENPA.

5. Other Matters

5.1 The CIPFA Code requires the Authority to include the following in its treasury management strategy.

5.2 Derivative Instruments: The code requires that the Authority must explicitly state whether it plans to use derivative instruments to manage risks. The general power of competence in Section 1 of the Localism Act 2011 removes much of the uncertainty over local authorities' use of standalone financial derivatives (i.e. those that are not embedded into a loan or investment). However, the Authority does not intend to use derivatives.

5.3 Should this position change, the Authority may seek to develop a detailed and robust risk management framework governing the use of derivatives, but this change in strategy will require Full Authority approval.

5.4 External Service Providers: The code states that external service providers should be reviewed regularly and that services provided are clearly documented, and that the quality of that service is controlled and understood.

5.5 Officers from the Somerset Council Treasury Management team report investment positions and performance via a monthly statement. As required by the CIPFA TM Code, the Chief Finance Officer reports to the Authority on its treasury activities in the form of a mid-year review and an Annual Treasury Management Report.

5.6 Markets in Financial Instruments Directive II (MiFID II): As a result of the second Markets in Financial Instruments Directive (MiFID II), from 3rd January 2018 local authorities were automatically treated as retail clients but could "opt up" to professional client status, providing certain criteria was met. This included having an investment balance of at least £10 million and the person(s) authorised to make investment decisions on behalf of the Authority have at least a year's relevant professional experience. In addition, the regulated financial services firms to whom this directive applies have had to assess that that person(s) have the expertise,

experience and knowledge to make investment decisions and understand the risks involved.

- 5.7 Somerset Council has met the conditions to opt up to professional status and has done so in order to maintain its erstwhile MiFID II status prior to January 2018. As a result, SC, and thereby ENPA, will continue to have access to products including money market funds, pooled funds, treasury bills, bonds, shares and to financial advice.

6. Background papers

- Local Government Act 2003 – Guidance under section 15(1)(a) 3rd Edition, effective from 1 April 2018.
- The CIPFA ‘Treasury Management in the Public Services’ Code of Practice: Edition 2021.
- The CIPFA Prudential Code for Capital Finance in Local Authorities: Edition 2021.
- Note: For sight of individual background papers please contact the report author.

Ben Barrett
Chief Finance Officer
February 2024

Treasury Management Policy Statement

1. Introduction and Background

- 1.1 The Exmoor National Park Authority (ENPA) adopts the key recommendations of CIPFA's Treasury Management in the Public Services: Code of Practice (the code), as described in Section 5 of the Code
- 1.2 Accordingly, ENPA will create and maintain, as the cornerstones for effective treasury management:
- A treasury management policy statement, stating the policies, objectives and approach to risk management of its treasury management activities.
 - Suitable treasury management practices (TMPs), setting out the manner in which the organisation will seek to achieve those policies and objectives, and prescribing how it will manage and control those activities.
 - Investment management practices (IMPs) for investments that are not for treasury management purposes.
- The content of the policy statement, TMPs and IMPs will follow the recommendations contained in Sections 6, 7 and 8 of the TM Code, subject only to amendment where necessary to reflect the particular circumstances of this organisation. Such amendments will not result in the organisation materially deviating from the TM Code's key principles.
- 1.3 ENPA will receive reports on its treasury management policies, practices and activities, including, as a minimum, an annual strategy and plan in advance of the year, a mid-year review, and an annual report after its close, in the form prescribed in its TMPs.
- 1.4 ENPA delegates responsibility for the implementation and regular monitoring of its treasury management policies and practices, and for the execution and administration of treasury management decisions to the Chief Finance Officer as Section 151 Officer, who will act in accordance with the organisation's policy statement and TMPs and, if he/she is a CIPFA member, CIPFA's Standard of Professional Practice on Treasury Management.
- 1.5 ENPA nominates the full Authority to be responsible for ensuring effective scrutiny of the treasury management strategy and policies.

2. Policies and Objectives of Treasury Management Activities

- 2.1 ENPA defines its treasury management activities as: -
- “The management of the organisation's borrowing, investments and cash flows, including its banking, money market and capital market transactions, the effective control of the risks associated with those activities and the pursuit of optimum performance consistent with those risks.”*
- 2.2 ENPA regards the successful identification, monitoring and control of risk to be the prime criteria by which the effectiveness of its treasury management activities will be measured. Accordingly, the analysis and reporting of treasury management activities will focus on their risk implications for the organisation, and any financial instruments entered into to manage these risks.

- 2.3 ENPA acknowledges that effective treasury management will provide support towards the achievement of its business and service objectives. It is therefore committed to the principles of achieving value for money in treasury management, and to employing suitable performance measurement techniques, within the context of effective risk management.
- 2.4 ENPA's borrowing will be affordable, sustainable and prudent and consideration will be given to the management of interest rate risk and refinancing risk. The source from which the borrowing is taken, and the type of borrowing should allow ENPA transparency and control over its debt.
- 2.5 ENPA's primary objective in relation to investments remains the security of capital. The liquidity or accessibility of ENPA's investments followed by the yield earned on investments remain important but are secondary considerations.

Appendix B

Somerset Council Lending Counterparty Criteria 2023-24

The following criteria will be used to manage counterparty risks to Somerset Council investments for new deposits / investments from 1st April 2023.

Please note that the limits in this appendix apply only to Treasury Management Investments, not to those detailed in the separate Investment Strategy.

Where deposits held were made under previous criteria, there will be no compulsion to terminate those deposits to meet new criteria, where a penalty would be incurred.

Deposits

Any Financial Institution that is authorised by the Prudential Regulation Authority to accept deposits in the UK, or is a UK Building Society can be lent to, subject to the rating criteria below at the time of the deposit.

Unrated Building Societies

Unrated Building Societies as identified by Treasury Advisors can be used, with a maximum of £1m per Society and a maximum maturity of 1 year.

Marketable Instruments – Any bank, other organisation, or security whose credit ratings satisfy the criteria below: -

Rating of Counterparty or Security

Deposits or instruments of less than 13 months duration (refer to long-term ratings)

Fitch A- or above

S&P A- or above

Moody's A3 or above

The maximum deposit / investment amount for any authorised counterparty or security that has as a minimum at least two ratings of the three above will be £20m. This is approximately 4.4% of investment balances held at 30th September, or 6.5% of investment balances minus strategic funds held at 30th September. The % may be significantly less if borrowing up to the CFR is taken early in the year.

The maximum deposit / investment amount for any authorised counterparty or security that has as a minimum - Fitch AA-, S&P AA-, and Moody's Aa3, will be £25m. This is approximately 5.5% of investment balances held at 30th September, or 8.1% of investment balances minus strategic funds held at 30th September. The % may be significantly less if borrowing up to the CFR is taken early in the year.

Deposits or instruments of more than 13 months duration (refer to long-term ratings)

Fitch AA- or above

S&P AA- or above

Moody's Aa3 or above

The maximum deposit / investment amount for more than 13 months for any authorised counterparty or security that has as a minimum at least two ratings of the three above will be £10m. This figure is to be included in the overall figure above.

The allowed deposit amounts above are the single maximum per counterparty at any one time, and that counterparty or security must be rated as above or better by at least two of the three agencies. Short-term ratings will be monitored and considered in relative rather than absolute terms.

It remains the Council's policy to suspend or remove institutions that still meet criteria, but where any of the other factors below give rise to concern. Also, when it is deemed prudent, the duration of deposits placed is shortened or lengthened, depending on counterparty specific metrics, or general investment factors. Where deposits held were made under previous criteria, there will be no compulsion to terminate those deposits to meet new criteria, where a penalty would be incurred.

Operational Bank Accounts

As the Council's current bankers, NatWest are currently within the minimum criteria. If they should fall below criteria, the instant access Call Account facility may still be used for short-term liquidity requirements and business continuity arrangements. This will generally be for smaller balances where it is not viable to send to other counterparties or in the event of unexpected receipts after the daily investment process is complete. Money will be placed in the instant access NatWest call account overnight.

Public Sector Bodies

Any UK Local Authority or Public Body will have a limit of £15m and a maximum maturity of 5 years.

The UK Government, including Gilts, T-Bills, and the Debt Management Office (DMADF) will be unlimited in amount and duration.

The table below gives a definition and approximate comparison of various ratings by the three main agencies: -

Definitions of Rating Agency Ratings

	Fitch		Moody's		S&P	
Short-Term	F1+	Exceptionally strong	P-1	Superior	A-1+	Extremely strong
	F1	Highest quality			A-1	Strong
	F2	Good quality	P-2	Strong	A-2	Satisfactory
	F3	Fair quality	P-3	Acceptable	A-3	Adequate
	B	Speculative	NP	Questionable	B and below	Significant speculative characteristics
	C	High default risk				
	(+) or (-)		(1,2, or 3)		(+) or (-)	
Long-Term	AAA	Highest quality	Aaa	Exceptional	AAA	Extremely strong
	AA	V High quality	Aa	Excellent	AA	Very strong
	A	High quality	A	Good	A	Strong
	BBB	Good quality	Baa	Adequate	BBB	Adequate capacity
	BB	Speculative	Ba	Questionable	BB and below	Significant speculative characteristics
	B	Highly Speculative	B	Poor		
	CCC	High default risk	Caa	Extremely poor		

Financial Groups

For Financial Groups (where two or more separate counterparties are owned by the same eventual parent company) investments can be split between entities, but an overall limit equal to the highest rated constituent counterparty within the group will be used.

Country Limits

Excluding the UK, there will be a limit of £30m collectively to all organisations domiciled in one Sovereign County. This is approximately 6.6% of investment balances held at 30th September, or 9.7% of investment balances minus strategic funds held at 30th September. The % may be significantly less if borrowing up to the CFR is taken early in the year.

Money Market Funds

Any LVNAV Money Market Fund used must be rated by at least two of the main three ratings agency, and must have the following ratings.

Fitch AAmmf	Moody's Aaa-mf	Standard & Poor's AAAM
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Subject to the above, deposits can be made with the following limits: -

The lower of £15m or 0.5% of the total value for individual Funds.

No more than 50% of total treasury investments outstanding are to be held in LVNAV MMFs.

VNAV and other Pooled Funds

Currently, not all Variable Net Asset Value (VNAV) Funds carry a rating. Many VNAV bond funds are not rated. Equity, multi-asset and property funds are also not credit rated.

A full review of Pooled Funds after the amalgamation of the five Council's portfolios will determine strategy and investment in these longer-term assets. It is the Council's intention to not invest further in Pooled Funds until the review is complete.

It is Somerset Council's ambition that any strategic investments within the treasury assets in pooled funds invested in bonds/equities or property would be held exclusively against general and earmarked reserves of the Council or cash and the Council will not borrow or use existing debt to support such investments. Depending on the position inherited from the 5 predecessor Councils a period of adjustment may be needed to realise this ambition and consideration must be given to waiting for the correct pricing point to obtain best value for the Council.

The decision to stay invested / invest further / disinvest / rebalance the Pooled Funds portfolio will be primarily based on the liability benchmark, and specifically whether the duration of debt and the necessary level of reserves supports longer-term investments. As potential investment would lock away capital for 3 to 5-years plus, the level of prudent investment would be commensurate with the level of core balances and reserves available for/during that timeframe.

Diversification of asset classes/funds and the overall level of investment will be determined by the Section 151 Officer with reference to the level of core balances and reserves. Secondly, it will consider the evaluation of the risk/reward characteristics including volatility, expected income return and potential for capital growth of individual funds.

It may be decided that a percentage of core balances and reserves is deemed the most appropriate limit for Pooled Funds, but in any case, this will not exceed the £144.3m in total currently held, or £20m in any one fund. (with the exception of the amalgamated CCLA Property Fund holding which is £31m).

Other Indicators

The Council will continue to use a range of indicators, not just credit ratings. Among other indicators to be taken into account will be:

- Credit Default Swaps and Government Bond Spreads.
- GDP, and Net Debt as a Percentage of GDP for sovereign countries.
- Likelihood and strength of Parental Support.
- Banking resolution mechanisms for the restructure of failing financial institutions, i.e. bail-in.
- Share Price.
- Market information on corporate developments and market sentiment towards the counterparties and sovereigns.
- Underlying securities or collateral for covered instruments.
- Other macroeconomic factors

EXMOOR NATIONAL PARK AUTHORITY

5 March 2024

SCHEME OF MEMBERS' ALLOWANCES 2024/25

Report of the Head of Finance and Operations

Purpose of the report: To consider and adopt a Scheme of Members' Allowances for 2024/25, including adopting a new Dependents Carer's Allowance.

RECOMMENDATION: To ADOPT the Scheme of Members' Allowances 2024/25 as set out in Appendix 1, subject to future adjustments to Members' Allowances as linked to staff cost of living pay awards.

Authority Priority: Achieve best value from our resources and improve our performance.

Legal and Equality Implications: The Local Authorities (Members' Allowances) (England) Regulations 2003 require the Authority to adopt a scheme of allowances before the start of each financial year. The equality and human rights impact of the recommendation of this report has been assessed as having no adverse impact on any particular group or individual.

Financial and Risk Implications: Provision was made within the Core Budget for a 3.88% increase in the Scheme of Allowances for 2023/24 and for 3% in 2024/25. If the actual increase differs to this then there will be the opportunity when the Revised Budget is set in November 2024 to make the necessary adjustments.

Climate Change Response: It has been assessed that this report does not have an adverse impact on our ability to respond to climate change.

1. Introduction

1.1 Under the Local Authorities (Members' Allowances) (England) Regulations 2003, the Authority is required to publish a Scheme of Members' Allowances every 12 months and the Scheme for 2024/25 should be published before the start of the 2024/25 financial year on 1 April 2024.

2. Local Government Pay and the Basic Allowance

2.1 Under the Authority's Scheme of Members' Allowances, adjustments to the Basic Allowance are linked to staff cost of living pay awards. As of February 2024, the staff pay award for 2024/25 has yet to be announced. When this has been agreed, members allowances will be uplifted and backdated to reflect this change.

2.2 The Scheme of Members' Allowances will therefore be revised to reflect this.

2.3 The Basic Allowance is payable in recognition of time devoted by Members, including; dealing with correspondence; attendance at meetings; training; conferences and workshops and incidental costs such as, the use of their private telephone and postage.

3. Special Responsibility Allowances

- 3.1 Special Responsibility Allowances are payable to Members who have been given significant responsibilities on the basis of the multipliers set out below.

Chairperson of the Authority	2 x basic allowance
Deputy Chairperson of the Authority	1.5 x basic allowance
Chairperson of the Planning Committee	1.5 x basic allowance
Chairperson of the Standards Committee	.25 x basic allowance
Chairperson of the Exmoor Consultative and Parish Forum	.5 x basic allowance

4. Dependents Carer's Allowance

- 4.1 The Authority's Scheme of Members Allowances has not previously included a Dependents Carer's Allowance. As its name suggests, this type of allowance is intended to reimburse some of the expenses of arranging child or adult dependent care incurred by a Member when carrying out specified duties, such as attending meetings. Making provision for this new allowance is one small step in our wider activities to encourage a greater diversity of Membership of the Authority. The suggested amendments to give effect to this proposal are shown in the scheme attached to this report.
- 4.2 Members should note that the Local Authorities (Members' Allowances) (England) Regulations 2003 gave County and District Councils an express power to pay a dependents' carers' allowance. The regulations do **not** give this express power to English National Park Authorities (nor do they prohibit payment). The General competency power provided to English National Park Authorities (section 65A of the Environment Act 1995), provides the requisite legal power to provide such allowance.
- 4.3 All three constituent local authorities (Somerset Council, Devon County Council and North Devon Council) include a dependents' carers' allowance in their schemes, as well as a small number of other National Park Authorities (Lake District, Yorkshire Dales and North York Moors).

5. Mileage and Subsistence Claims

- 5.1 Mileage allowance rates are paid to Members and staff in accordance with the Authority's Green Travel Plan.
- 5.2 Levels of subsistence allowances for Members and staff are broadly based on the movement of indices provided by others, such as the Consumer Price Index, and the scheme provides flexibility for allowances to be updated as necessary. The current levels of subsistence allowances are set out in the attached draft Scheme of Allowances.

Ben Barrett
Head of Finance and Operations
February 2024

**EXMOOR NATIONAL PARK AUTHORITY
SCHEME OF MEMBERS' ALLOWANCES 2024-25**

1. Introduction

Exmoor National Park Authority's scheme provides for payment of:-

- A **Basic Allowance** which is a flat rate payable to each Member;
- A **Special Responsibility Allowance** for Members undertaking additional roles as defined by the Authority.

2. General Points

The term "Member" in these notes means a Member of the Exmoor National Park Authority.

Members have the option of not claiming all or part of any allowance. The Head of Finance and Operations must be notified in writing if a Member chooses this option.

All enquiries relating to Members allowances should be made to our Member Services Team (tel 01398 323665) or e-mail membersupport@exmoor-nationalpark.gov.uk.

3. Basic Allowance

- Is payable to all Members.
- Is £3,095.28 per annum from 1 April 2024, payable in arrears in monthly instalments. This is paid automatically (unless a Member has opted not to receive it in whole or in part) and Members do not need to claim it.
- Recompenses Members for time devoted to their work as a Member and is intended to cover
 - preparation for and attendance at Authority, committee, sub-committee, panel and working group meetings (including travel time to and from meetings)
 - preparation for and attendance at seminars, conferences and training sessions
 - representing the Authority on "outside organisations"
 - dealing with correspondence
 - single Member duties
 - other incidental costs for which no other specific provision is made, including use of Member's home
- Adjustments to the annual Basic Allowance will be linked to staff cost of living pay awards.
- Where the Member's term of office begins or ends at any time other than the start of the financial year, they are entitled to the appropriate proportion of the annual allowance.

4. Special Responsibility Allowance

- Is payable in addition to the Basic Allowance.
- Is payable to Members who have been given significant responsibilities e.g. Chairperson, Deputy Chairperson and Chairperson of the Planning Committee.
- Is allocated on the degree of responsibility and upon the perceived call on the Member's time, as agreed by the Authority, with no Member receiving more than one Special Responsibility Allowance at any one time.
- Is paid in arrears in 12 equal instalments automatically (with no need for the Member to claim) and where applicable is apportioned for part year entitlements.
- Is intended to cover:-
 - significant additional work preparing for meetings
 - meetings with officers
 - meetings with fellow chairmen
 - acting as the spokesperson for their area of special responsibility
 - dealing with correspondence
 - visits directly connected to the performance of a Special Responsibility Allowance, e.g. official openings, fact finding visits
- Does not include any element for travel expenses, which are claimable in the normal way for any Special Responsibility Allowance duty.
- Is banded on multiples of the basic allowance to reflect the work and responsibilities that have to be undertaken and will be paid as follows:-

Chairperson of the Authority	2 x basic allowance
Deputy Chairperson of the Authority	1.5 x basic allowance
Chairperson of the Planning Committee	1.5 x basic allowance
Chairperson of the Standards Committee	.25 x basic allowance
Chairperson of the Exmoor Consultative and Parish Forum	.5 x basic allowance

- To cater for changes in circumstances that can occur during the year and to ensure that no individual cases of exceptional hardship are experienced, the Chief Executive and the Head of Finance & Operations in consultation with the Chairperson of the Authority can agree Special Responsibility Allowances temporarily for individual Members as considered necessary.

4. Dependents Carer's Allowance

5.1 Subject to paragraphs 5.2 and 5.3, Dependents Carer's Allowance (DCA) may be claimed where a Member arranges paid care in respect a spouse/partner, child or parent, or a person living with you in the same household (but not as an employee, tenant, lodger or border), or someone who is involved in an emergency where you are the only person who can help.

5.2 Payment of DCA is:-

- claimable for any **approved duty**, and for attending meetings or events covered by a **special responsibility payment** ; payable for the duration of the meeting or event attended, plus travelling time to and from the meeting;

- paid on the basis of the actual expenditure incurred, subject to a maximum hourly rate and a maximum annual allowance, as specified in Appendix 2;
- not payable where a Member already receives a carer's allowance from the Department for Works and Pensions;
- not payable where the care provided is by a parent of the dependent, a person who is part of the Member's household or someone under 16;
- claimed monthly on the Members' claim form.

5.3 All claims for DCA must be supported by receipts.

5. Travel Allowance

- Current rates are shown in Appendix 2.
- Can only be claimed for an approved duty (which is set out in Appendix 3) or one covered by a Special Responsibility Allowance.
- Should be claimed promptly at the end of each month on the Members' claim form.
- For official journeys outside Somerset and Devon see policy as set out in Appendix 2.
- Train fares are normally reimbursed at the standard class rate. Members eligible for a Railcard who regularly use the train for Authority business may reclaim the cost of the railcard.

NB The Member Services Team can obtain pre-booked tickets for Members; such advance bookings attract cheaper fares and reserved seats.

- Wherever possible, Members should share transport.
- Taxi fares will be reimbursed in exceptional circumstances on production of receipts.
- Expenditure on tolls, parking fees, etc may be claimed for re-imburement on production of receipts.
- Members are advised to check the position with their insurer to ensure they have adequate vehicle insurance cover in place to include use of their vehicle for Authority business.

6. Subsistence Allowance

- Is claimable for the actual cost of the meal or overnight expenses (excluding alcoholic drinks) up to the same maximum set out for staff which is updated annually. Current rates are shown in the attached Appendix 2.
- Subsistence claims should not include receipts for the purchase of alcoholic drinks.
- Is claimable for any approved duty or Special Responsibility Attendance exceeding 4 hours which spans the agreed meal time periods where additional expenditure is incurred.
- Should be claimed promptly at the end of each month on the Members' claim form and receipts must be attached to support the claim. Claims made without proof of expenditure will only be paid in special circumstances and will be

referred for the approval of the Head of Finance and Operations in consultation with the Chairperson or Deputy Chairperson of the Authority.

- Is not claimable if a meal is provided free of charge.
- For special circumstances the Head of Finance and Operations can agree allowances in excess of the maximum where this is considered necessary and appropriate.

7. Non Claimable Duties

- For the avoidance of doubt, the following duties are **not** approved for the purpose of claiming travel or subsistence allowances:-
 - Single Member duties
 - Attendance at Parish Council meetings
 - Attendance at any committee, panel or working group meetings to which a Member has not been appointed, unless as a previously named substitute

8. Payment of Allowances

- Basic Allowances and Special Responsibility Allowances are paid automatically monthly after completion of:-
 - Written undertaking to comply with the Code of Conduct for Members
 - Declaration of interests
 - Tax, National Insurance and Bank detail pro-formas

These allowances are treated as imbursements and subject to Tax and National Insurance Contributions under PAYE regulations.

- Travel and subsistence must be claimed monthly on the Members' Claim Form. Mileage Allowances are taxed according to the profit element which is calculated by comparing the amounts paid per mile with the Inland Revenue's Authorised Mileage Rates. Reimbursement of subsistence and other expenses incurred (car park fees, tolls, taxis etc) should not give rise to a tax or national insurance contribution liability as there is no profit element involved.
- Fuel receipts which predate the dates of travel should be attached to the monthly mileage claim form in order that VAT can be reclaimed on the expenses paid.
- Claims must be submitted monthly. Claims not received by the Member Services Team by the 5th day of the following month will not be paid that month.
- A supply of claim forms can be obtained from the Member Services Team.
- Allowances must not be claimed where the Member is entitled to receive payment from another body for the same duty/activity.
- Payments are made through Somerset Council which provides a payroll bureau service to Exmoor National Park Authority.
- Payment has to be made directly into a Bank or Building Society account.
- Members can request a PAYE code from the Inland Revenue for the taxable payments, otherwise payments will be taxed at the basic rate of tax. Some Members may be able to obtain an exemption card for national insurance. Some female Members may be able to obtain a reduced rate certificate (married

women or widows). Members seeking advice on the national insurance calculation matters should contact their tax office or the Head of Finance and Operations.

- The Authority regularly reviews expenditure on Members Allowances to ensure the budget is not overspent. In order to assist with the monitoring of the budget Members are asked to submit claims monthly, no matter how small.
- Claims older than 2 months will be referred for the approval of the Head of Finance and Operations in consultation with the Chairperson or Deputy Chairperson of the Authority and therefore payment may be delayed or refused.

9. Unemployment Pay and Statutory Sick Pay

- Members who are unemployed normally do not lose entitlements to unemployment benefit as a result of receiving a Basic Allowance or Special Responsibility Allowance, even though the earnings rule may be exceeded. Members entitled to Disability Benefits may find this entitlement is affected. In such cases Members should clarify the situation with their Tax Office.
- Members are regarded as “employees” under the Social Security and Housing Benefits Act 1982 and are entitled to receive sick pay for the first 28 weeks of sickness a year. If Members wish to pursue claims for sickness benefit, the period of sickness should be in excess of 3 consecutive days and the Member Services Team must be given prompt notification of sickness.

**EXMOOR NATIONAL PARK AUTHORITY
TRAVEL AND SUBSISTENCE**

1. **Mileage Rates** (up to 8500 miles per annum after which reduced rates apply) for journeys within Somerset and Devon, and between Members' homes and Dulverton:-
 A flat rate allowance: **46.9p**, Passenger supplement: **5p** per passenger per mile
 The rate for use of a motor cycle is 21p per mile.

2. **Journeys Outside Devon and Somerset** For journeys outside Devon and Somerset Members should use public transport whenever possible and appropriate. Recognising that there are situations when it would be more appropriate to travel by private vehicle the rate of **35.2p** per mile is payable unless a case can be made for payment of the full mileage rate and this is subject to PRIOR approval by the Chairperson or Deputy Chairperson of the Authority. Travel by car can be either by the use of a hire car or by the payment of the normal mileage rates for the journey. Situations where such prior approval is appropriate are on the grounds of:-
 - sustainability where two or more people are sharing a vehicle
 - inadequacy where public transport is not available or the journey is too time consuming involving changes of trains and taxis
 - economy where the costs of using public transport are significantly greater, overnight stays would be avoided, etc.
 - efficiency where savings in staff and Members time could justify the payment of the full rate

NB Members must ensure that they have adequate insurance cover for journeys made by them in respect of Exmoor National Park Authority business.

3. **Subsistence Allowances**

Breakfast	£7.50	Claimable if away from normal place of residence for more than 4 hours before 11.00am.
Lunch	£10.15	Claimable if away from normal place of residence for more than 4 hours including the lunch time period of 11.30am and 2.30pm.
Tea	£4.30	Claimable if away from normal place of residence for more than 4 hours including the period 3pm to 6pm and cannot be claimed if Evening Meal Allowance is also claimed.
Dinner	£14.00	Claimable if away from the normal place of residence more than 4 hours, ending after 7pm and cannot be claimed if tea is also claimed.
Overnight	£120.00	Claimable if away overnight from normal place of residence for overnight accommodation including breakfast.
Out of Pocket	£5.80 p/nt £23.25 p/wk	Claimable for residential courses and conferences.
Receipts must be submitted to obtain subsistence allowances up to maximum allowances above.		
Dependents' Carers' Allowance Hourly rate paid up to the national living wage. Maximum annual allowance (equivalent to 100 hours per Member per year)		Up to £11.44/hr from 1/4/24 £1,144

Notes: Members will be taxed at their marginal rate for the cost of travelling between home Exmoor House. Reimbursement of all other receipted subsistence and other expenses should give rise to a tax or national insurance liability.

**EXMOOR NATIONAL PARK AUTHORITY
LIST OF APPROVED DUTIES FOR THE PAYMENT OF
TRAVEL AND SUBSISTENCE ALLOWANCES**

Each of the following duties shall be regarded as authorised by the ENPA:-

- Attendance at any
 - Exmoor National Park Authority meeting
 - Meeting of any Authority Committee or Sub Committee to which the Member is formally appointed by the Authority or specifically invited by the Chairperson
 - Meeting of the Planning Committee where the Member is not formally appointed but where the Member wishes to address the Committee on an item of business being considered at that meeting
 - Working group or panel meetings to which the Member has been appointed by the Authority
 - “ad hoc” meetings and site visits set up by the ENPA or its committees when attending as an appointed Member
 - Association of National Park Authorities meetings as agreed by the Authority
- The undertaking of any duty associated with the ENPA or its committees and sub-committees, including briefing sessions, site visits, meetings with outside bodies or individuals, by:
 - the Chairperson and Deputy Chairperson of the Authority
 - the Chairperson of the Planning Committee
 - the Chairperson of the Standards Committee
 - the Chairperson of the Exmoor Consultative and Parish Forum
- Attendance on Authority, committee and sub-committee tours of inspection and at Members' conferences or seminars where formally appointed by the ENPA
- Attendance as the ENPA's nominee or representative at meetings associated with approved bodies
- Attendance at Open Days, official ceremonies where the Member is performing a specific function
- Attendance at any approved conference where appointed by the ENPA or a committee or sub-committee
- Any other attendance for which prior approval has been given by the Chairperson or Deputy Chairperson of the Authority

NB A duty cannot be approved, in retrospect, for the purpose of paying allowances

EXMOOR NATIONAL PARK AUTHORITY

5 March 2024

APPOINTMENTS TO THE PLANNING COMMITTEE

Report of the Head of Climate, Nature and Communities

Purpose of the report: In accordance with the amendments to Standing Orders which will come into effect from 1 April 2024, to set out the appointments to be made to the Planning Committee.

RECOMMENDATION: To make appointments to the Planning Committee as detailed in this report, or as agreed by the Authority Committee.

Authority priorities: The Authority's appointments to its various Committees are central to the achievement of each of the Partnership Plan and Corporate Plan priorities.

Legal and equality implications: The meetings and proceedings of a National Park Authority are regulated by local government law as if the National Park Authority was a local authority. The equality impact of the recommendations of this report have been assessed as having no adverse impact on any particular group or individual.

Financial and risk implications: There are no significant financial or risk implications of the recommendation of this report.

Climate change implications: It has been assessed that this report does not have an adverse impact on our ability to respond to climate change.

1. Introduction

- 1.1 At the 7 November 2023 Authority Meeting, Members agreed to a number of changes to the Authority's meeting structures and governance
- 1.2 One of the recommendations adopted was the creation of a Planning Sub Committee made up of 12 Members with delegated responsibility to carry out the planning functions of the ENPA.
- 1.3 It was further agreed that the Planning Committee would come into effect in April 2024 for a trial period of up to 12 months. To represent local and national interests it was recommended that the Planning Committee should be made up as follows:
 - 4 Somerset Council
 - 1 Devon County Council
 - 1 North Devon District Council
 - 3 Secretary of State
 - 3 Parish Council

2. Appointments to the Planning Committee

2.1 All Members were invited to put forward their expressions of interest in being appointed to the Planning Committee, which it is proposed would run until the Member appointments process at the AGM in July 2025.

2.2 The expressions of interest received are as follows:

4 Somerset Council

- Christine Lawrence
- Frances Nicholson
- Steven Pugsley
- Fran Smith

1 Devon County Council

- Jeremy Yabsley

1 North Devon District Council

- John Patrinos

3 Secretary of State

- Dominic Elson
- Mike Kelly
- Evelyn Stacey

3 Parish Council

- Andrew Bray
- Mike Ellicott
- Bill Geen
- Jeremy Holtom

2.3 As four Parish Council Members have put their names forward for the three places available, all Members will be asked to cast a vote by secret ballot to decide which three Parish Members should sit on the Committee.

2.4 In line with the overall appointment process for Parish Members to the Authority, it is proposed that there be at least one representative from Devon and one from Somerset. The third Parish Member can be from either area of the Park.

Clare Reid
Head of Climate, Nature and Communities
February 2024

13.1



Committee Report

Application Number:	6/29/23/006
Registration Date:	23-May-2023
Target Determination Date:	12-Jul-2023
Extension of Time:	
Applicant	Mr I Carew
Agent:	
Case Officer:	Joe White
Site Address:	Hurlstone Bungalow, ALLERFORD, MINEHEAD, TA24 8HJ
Proposal:	Proposed demolition of existing bungalow and sheds. Erection of replacement eco-bungalow and new shed. (resubmission of application 6/29/21/121)
Recommendation:	Refusal
Reason for bringing before Authority Committee:	This application is brought to Committee in accordance with the Scheme of Delegation and acknowledging that the Committee has previously held a site visit for the application.

Relevant History

6/29/21/121 Proposed demolition of existing bungalow and erection of replacement bungalow, Withdrawn 11/04/2023

Site Description & Proposal

The application site lies in the open countryside, adjacent to the South West Coast Path, in a position to the north of Bossington. Access to the site is through a ford and along a track, known as Hurlstone Lane, which also carries the Coast Path from the National Trust car park in Bossington. It lies within the Heritage Coast designation and the High Wooded Coast, Combes and Cleaves landscape character type of the Landscape Character Assessment of Exmoor.

The site itself is a relatively slender strip of land immediately adjacent to the Coast Path. A dwelling dating from the 1920s occupies the site. The dwelling is in a relatively poor state of repair, and it appears it was last occupied in 2016.

The site of the dwelling itself lies in Flood Zone 1. However, part of the access lies within Flood Zone 3.

13.1

The site lies within the Impact Risk Zone of nearby Sites of Special Scientific Interest (SSSI). It borders Exmoor Coastal Heaths SSSI and is in close proximity to Exmoor Heaths Special Area of Conservation (SAC).

The proposed development scheme would be a replacement dwelling. It would be single storey with a linear form and stepped roof. The proposed dwelling would have a larger footprint than the existing dwelling and it would be constructed with timber clad walls and reclaimed clay roof tiles with integrated solar panels. Vehicle parking would be to the northern side of the dwelling. A new outbuilding would accommodate a biomass boiler. No changes are proposed to the access track.

The scheme has been amended since the initial submission of the application. It also follows a previous planning application (ref 6/29/21/121) that was withdrawn.

Consultee Representations

COMMENTS MADE AGAINST INITIAL SUBMISSION

South West Coast Path Association – (9 June 2023) This representation is on behalf of the South West Coast Path association, the charity that supports the South West Coast Path National Trail (SWCP), provides information on the route for the public and raises funds for improvements. The association is dedicated to ensuring the SWCP benefits from the best possible environment, as befits a route of national importance.

The Association notes the amended version of this application. It is acknowledged that the proposal is for a smaller and arguably less visible development than that put forward in the previous applications of January and May 2022; however, this is still considerably larger and more prominent than the existing building on site, and would thus result in an adverse impact on the SWCP and consequently for its users.

In this context, in policy terms Exmoor National Park Local Plan policy HC-D17 requires that a replacement dwelling should reflect the massing and scale of the original. This requirement does not appear to be met.

In addition, the proposal still requires use of the SWCP as the means of vehicular access. It is accepted that such rights may exist legally, but active use of such rights resultant on the proposal would impact on the character of the route and introduce a safety issue for users not currently experienced. These issues would be especially exacerbated during the construction phase, when substantial amounts of material would need to be transported along the SWCP.

In view of these issues impacting upon the environmental integrity of the SWCP, the Association objects to this application.

13.1

South West Water – (24 May 2023) As the site is outside our catchment, South West Water has no comment or concern.

Environment Agency – (26 May 2023 and 4 August 2023)

Flooding Advice

The building is in flood zone 1 so not at risk of flooding. However, the access and egress are in flood zone 3. Please find attached our standard planning advice note on access and egress which will help you determine whether the proposal is appropriate.

Main River Advice

It does not look like the development will take place near the main river but I have attached the Main River Advice should this not be the case. If there is to be any development or land raising within 8 meters of the main river, please reconsult us for further comment.

(23 August 2023) – Environment Agency Position No objection on flood risk grounds. Thank you for reconsulting us and confirming that no works are proposed to the existing access route, the river or ford. The development remains in flood zone 1, as such we have no objections on flood risk grounds.

SCC Highways Authority – (31 May 2023) Standing Advice – FYI access is onto/via a Bridleway WL 21/6, therefore Rights of Way should also be consulted on this Application.

National Trust – (16 June 2023) The National Trust is a conservation charity that looks after nature, beauty and history for the nation – for everyone, for ever.

The Trust is the custodian of the Holnicote estate, with its wild rugged moorland, shingle beaches, ancient woodland, and charming villages. The estate has some 150 miles of footpaths and bridleways for local people and visitors to enjoy. As the estate lies within the National Park, it is part of a nationally designated landscape.

To the north of Bossington, a track – which is a bridleway and the route of the South West Coast Path – heads up to Hurlstone Point. This is a popular route for local people, visitors to Exmoor, and long-distance walkers. Most of the land to the east of the bridleway is designated for its ecological importance (SSSI/SAC).

The track passes the land in the applicant's ownership, which includes a simple timber building (Hurlstone Bungalow). The surrounding land forms part of the Holnicote estate, in National Trust ownership. There is a vehicular right of access along the track to the land in the applicant's ownership. The previous owners also leased a parcel of land to the north for parking and vehicular access. The applicant has included this land, the cesspit, and the route to the public highway within the application site.

13.1

The Trust respects the historic use of the applicant's land, and its vehicular rights of access. However, we continue to have significant concerns about the applicant's proposed re-development of the site, as set out in the following pages.

Scale and design

We understand ENPA is viewing the existing building as a dwelling that has not been abandoned, hence a replacement dwelling might be supported in principle. As an initial point on the submitted plans, it is important that full proposed north and south elevations are provided (not just the end walls) to clearly show what is being proposed.

Turning to the planning merits, we have concerns about compliance with Local Plan policy HC-D17. This states that replacement dwellings should "reflect the massing and scale of the original dwelling". We believe the proposed dwelling would be notably larger in its floorspace, external area, length of building and ridge height of tallest element – compared to the existing timber cabin. The proposed dwelling has also been designed as four separate blocks of building. A more appropriate solution would be for a simpler design and form, in keeping with the character and scale of the existing.

Landscape and visual

The applicant's "Landscape Viability Appraisal" shows that the existing bungalow is visible from the track/Coast Path and also from Bossington Beach (partially concealed by trees). It concludes that the proposed dwelling would be largely concealed and would become increasingly so as the hedge in front increases in size. We question how much weight can be given to screening by a relatively ephemeral feature such as a hedge. A larger dwelling – with more windows – is likely to have a greater impact.

Site layout and parking

Page 7 of the Planning Statement shows vehicles parked within the residential curtilage (understood to be on the approved shed foundations). The proposed development involves a more elongated form of dwelling, spreading the development to the north, and limiting the scope for on-site car parking. In the previous application, the applicant proposed to excavate a parking area in the southern part of the site. The current application proposes to use the parcel of land to the north for vehicular access and parking. The Trust leased this land to the previous owners. The applicant wishes to continue with this arrangement. However, this is not currently apparent on the proposed site plan. Moreover, in planning terms, it may be preferable to ensure that space is retained within the residential curtilage for associated vehicle parking.

Construction access

The development site is accessed via a bridleway track that is in parts steep and in parts narrow, which fords the River Horner, and is frequented by users of the Coast Path. It is important that construction operations do not disrupt the local community and visitors or harm the local environment. We have reviewed the vehicle

13.1

management plan (VMP) and construction method statement (CMS) and have continued concerns:

- To note, we understand the property has been unoccupied since 2006, so there has been very limited use of the track by vehicles since then.
- The premise of the VMP is that the track is in regular use by agricultural tractors up to 3T. In reality, the use of this track has declined considerably over the years; the agricultural tenant rarely uses the track in a tractor (c. 6-7 times a year).
- Regarding 'Access Rights' and 'Site Access' in the CMS, the easement restricts the weight of any vehicles to 3.5 tonnes or under unless the National Trust gives written consent (not to be unreasonably withheld). The easement also precludes vehicles from parking or obstructing access along the route.
- The CMS states that "most of the unloading (and some loading) will necessarily need to be undertaken outside of the site". Previously using the public highway and National Trust land at Bossington Green was proposed. We objected to this. We are now unclear as to where unloading onto 4x4 vehicles would take place.
- Construction access is needed for a 7-month period. The area is busy with visitors in summer, whilst the ford is impassable at certain times of the year.

Main river

In respect of the River Horner, we previously advised the applicant that the eroded bank level with the end of the play area wall would need stabilising to allow for construction access to the development site. We understand that the Environment Agency (EA) was involved at pre-application stage and has commented on the current application – asking to be re-consulted if there is any development or land raising within 8 metres of the main river. It would be helpful to have the EA's feedback on construction access, given our comment about stabilisation and the river-related mitigation proposed in the VMP.

Conclusion

Having reviewed the current application, the Trust continues to have significant concerns about the size/scale and wider impacts of the proposed development in this sensitive rural location reached via the Coast Path. And regarding construction access and management, and the potential impacts for the local community, visitors and the local environment. We therefore continue to object to the proposed development.

Campaign for the Protection of Rural England (CPRE) – (19 June 2023)

CPRE Somerset objected to the previous application 6/29/21/121. There is no significant changes in the new application and our core objections remain extant. We remain concerned by the larger footprint and note objections stating that the footprint calculations do not reflect the external floorspace, the veranda space, and space of the separate large shed.

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The stepped design of roofs and large separate shed will give the impression of four dwellings on the site, in our view, or alternatively of a substantial dwelling with an urbanised design featuring different roof heights. The design bears no relation in character or form to the original simple and modest rural structure. This over-scaled proposal will change the tranquil and undeveloped character and appearance of the location.

In our view the best solution would be repair and renovation, given that it appears now to be accepted that the site was not abandoned.

The Planning Statement says that repair and renovation of the existing structure would require extensive structural upgrading works and external insulation cladding and concludes that 'this approach is likely to result in a compromise in creating a sustainable dwelling and a visually pleasing building'. This statement is an unverified assertion as no planning application has been made yet to repair and renovate. It has at least now been acknowledged that repair and renovation is possible and feasible. The further reason given for not renovating and repairing - that it would be quicker to demolish and put up the proposed structure - is a spurious argument in our opinion. It would be better to take more time, and to repair and renovate.

Selworthy & Minehead Without Parish Council – (21 June 2023) Following on from the Parish Council meeting held on Monday 19 June, Selworthy and Minehead without Parish Council feel unable to reach any kind of decision other than pass this back to ENPA for your consideration. This planning application is, as you will appreciate complex and highly contentious within our community. We would urge you to carefully consider all the correspondence you have received in favour and against this application, along with those of organisations such as the CPRE and take these into consideration when forming your decision.

Natural England – (26 July 2023) No Objection

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites.

European sites

Based on the plans submitted, Natural England considers that the proposed development will not have likely significant effects on statutorily protected sites and has no objection to the proposed development. To meet the requirements of the Habitats Regulations, we advise you to record your decision that a likely significant effect can be ruled out.

Sites of Special Scientific Interest

Based on the plans submitted, Natural England considers that the proposed development will not have likely significant effects on statutorily protected sites and has no objection to the proposed development.

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(21 September 2024)

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England have previously responded to the Exmoor National Park Authority with no objection. Based on the plans submitted, we consider that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites and therefore our previous comments still stand.

Please note, as stated in the bat survey report, an EPS mitigation licence must be obtained from Natural England to permit the proposed works affecting the bungalow to proceed.

Exmoor Society – (26 July 2023) The Exmoor Society, a charity promoting the protection of Exmoor National Park for the benefit of all, has the following concerns:

1. The site plan shows that the sheds are to be demolished and a new hedge planted. Demolition of the sheds requires ecological assessment, not included.
2. The traffic management statement mentions that Hurlstone Lane already has vehicular use. In practice, there is only occasional tractor use along the wide stretch as far as the large field adjacent to the Horner Water, and virtually no vehicle use along the narrow section between the junction of the field gate and existing bungalow. On rare occasions, National Trust Rangers use a Quad bike or Mule there for countryside management. Near the bungalow, the SW Coast Path/public bridleway is very narrow, so hazardous for pedestrians and vehicles sharing the same route.
3. The bridleway from Bossington is part of the SW Coast Path. Well-used by walkers, families with dogs, cyclists and horse riders, additional vehicular traffic will have a negative impact on people's amenity, enjoyment, and experience of tranquillity. The bridleway is already eroded and often the ford cannot be crossed in winter. Also, the right of way is very narrow in places and the SW Coast Path will be compromised.
4. The Landscape Viability Appraisal contradicts others' opinion that the sensitive coastal location within the Heritage Coast will have a negative impact on landscape character: specifically, in daylight, visibility from Bossington Beach, the two public footpaths around Bossington Hill and above the property; at night, extra light pollution in this remote part of Exmoor Dark Skies Reserve. The proposal to mitigate visibility of the intended bungalow and its associated structures by increasing frontal hedge height and thickness should be a requirement.

Exmoor Natural History Society – (3 July 2023) As Chair of Exmoor Natural History Society I would like to object to this application on behalf of the society. This development will cause damage and disturbance to the wildlife and habitats in this

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special tranquil area. We do not feel that the ecological issues have been thoroughly addressed.

Future Landscapes Officer – (7 July 2023) Object.

The revised application has a number of amendments that address concerns raised in the previous application. However, I would like clarification on whether the parking next to the dwelling would involve the creation of hard standing, and if so, what is proposed?

The omission of the parking area adjacent to the track

This removes the need for substantial excavation of the bank and disposal of material onsite. It also takes parked vehicles out of the public realm and no longer in full sight from the PRoW, retains more of the stone face bank alongside the property boundary and addresses safety concerns over visibility and vehicles needing to use the track for turning.

Concerns over the impact of construction traffic on the track (Hurlstone Lane)
Further documentation has been provided in the Vehicle Management Plan and Construction Method Statement. They indicate the level of caution, protective measures and mitigation to minimise risk of damage to the track and river bank and also safe passage for pedestrians and should be adhered to by all construction/delivery personnel.

Visual impact

Visibility of the site is primarily from the adjacent track and Bossington Beach. There are a number of other amendments that have been incorporated that would reduce the visual impact of the development. This includes:

- The relocation of the steps to the end of the plot, enabling a continuous hedgerow boundary screen along the frontage of the building
- Thickening up and gap filling of the hedgerow along the frontage for increased screening
- Aligning the steps to minimise views in, towards the dwelling
- The inclusion of integrated slimline solar roof panels
- The positioning of the boiler shed at the rear of the site (as amended in the previous application)

Whilst a stepped roof and façade does break up the massing more than a single rectangular building would, I still have concerns over the massing and scale of the proposed dwelling and its appropriateness in this location.

Wildlife Officer – (6 July 2023) Object.

Thank you for consulting me on this application which is a resubmission of a previous application. It is clear that work has been done to address concerns I had relating to the previous application. The specific outstanding concerns I had were:

- Potential impacts of construction-related traffic crossing the ford

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- Potential impacts of construction-related traffic resulting in erosion/collapse of the river bank
 - Ensuring no net-loss of biodiversity on site and seeking net gain in line with local and national policies
 - Ensuring appropriate management of invasive non-native species on site (specifically three-cornered leek)
 - Clarification of the proposed use of the area to the north of the property

These have largely been addressed and further information provided upfront including the Ecological Mitigation and Enhancement Strategy and a Landscape and Ecological Management Plan. Unfortunately, I do however have concerns about bat surveys for the sheds as detailed below.

Documents submitted in support of the application with particular relevance to ecology include:

- Update Ecological Walkover, Seasons Ecology, April 2023 (letter dated 3 May 2023)
- CEMP, EMES and LEMP, Seasons Ecology (Issue 1, 10 May 2023) + updated figure (030723)
- Vehicle Management Plan (Milestone, undated)
- Bat Survey Report, Smart Ecology, July 2022 (Issue 2, October 2022)
- Badger Survey Report, Smart Ecology, July 2022 (Issue 1, July 2022)
- Preliminary Ecological Appraisal, Seasons Ecology, February 2022 (Issue 3, March 2022)

The methods, presentation of results and recommendations within the ecological reports are satisfactory.

The site has been identified as comprising a bungalow and shed within a landholding which comprises semi-improved grassland, scrub, trees, introduced shrubs and hedgerows with fencing and retaining walls. The bungalow was identified as having high suitability for roosting bats and has been found to support a summer day roost for low numbers of common pipistrelle bats (maximum count of one bat) and a summer day roost for low numbers of lesser horseshoe bats (identified by DNA analysis of droppings). The shed and other outbuildings provided night roosting opportunities but no evidence of this has been recorded in the shed. The outbuildings were not surveyed as it was understood they would not be impacted at the time of the further surveys*. At least six species of bat were recorded during the bat surveys, including rarer and more light sensitive species such as greater and lesser horseshoe. In addition, the site provides opportunities for other protected/notable species including bluebell, badger (dung recorded on site), dormice, other mammals such as hedgehog, nesting birds (confirmed in the shed) and reptiles. No badger setts were recorded on or within 30m of the site and no signs of badger activity were recorded during a further survey in July 2022 (following identification of badger dung in January 2022 which indicates that badger are active in the area). Three-cornered leek, an invasive non-native species listed on Schedule 9 of the Wildlife and Countryside Act has been recorded on site.

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I note the application now includes the demolition of the two sheds to the north of the property. These were assessed within the original PEA (Seasons Ecology, February 2022) and identified as having opportunities as a feeding/night roost. An internal inspection was recommended during the active season to confirm use as a feeding/night roost. However, this was not undertaken during 2022 as the proposals were not affecting these buildings at that time. A survey to confirm use as a feeding/night roost therefore needs completing prior to determination. This is my reason for objection at this stage.

Appropriate recommendations have been included in the survey reports including: an EPSL will be required prior to works commencing that would otherwise cause an offence with bat mitigation including a compensatory bat roost in the roof of the boiler shed, the exact details of which will need to be agreed by Natural England post-planning but which seems appropriate to me; construction environmental management plan; precautionary methods of work with respect to dormice; a pre-commencement survey and careful working methods with respect to badger; consideration to the nesting bird season; precautionary methods of work with respect to reptiles; safe removal and disposal of three-cornered leek to prevent spread of INNS.

As recommended the CEMP, EMES and LEMP includes recommendations for protective measures to be undertaken prior to and during construction. It also demonstrates landscaping proposals for the site which show hedgerow, tree and shrub planting and areas of grassland which will be managed as a meadow for wildlife. Prescriptions for management are aimed at wildlife and are acceptable.

The vehicle management plan details consideration of potential impacts of construction-related traffic on the ford (and sensitive habitats downstream) and the riverbank. Mitigation proposed appears to be appropriate and must be adhered to. If any concerns are raised about the condition of the river or banks then work will have to stop until a solution is found.

Recommendations:

- The site lies directly adjacent to Exmoor Coastal Heaths SSSI and around 60m from the boundary of Exmoor Heaths SAC. Consultation with Natural England is required for all planning applications (except householder) in this Impact Risk Zone (IRZ), please do so, if not already completed.
- To ensure the 'strict protection' of European protected species I suggest we require a copy of the European protected species licence to be submitted to the Local Planning Authority prior to commencement.
- The recommendations within the CEMP, EMES and LEMP should be secured by way of appropriate condition, with evidence of the work completed by the Ecological Clerk of Works including a Toolbox Talk and supervision of work being submitted to the LPA to discharge the condition. This should also include evidence of the toolbox talk being given to all new members of the site team as part of their induction by the Biodiversity Champion. Let me know if you want to discuss the wording for this.

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- A pre-works survey for badger should be conditioned.
 - Evidence of nesting birds was found and therefore precautionary measures have been recommended. I recommend a suitable condition is attached to any planning permission granted to ensure no vegetation removal or demolition works take place between 1st March and 31st August inclusive, unless a competent ecologist has undertaken a careful, detailed check for active birds' nests immediately before the work and provides written confirmation that no birds will be harmed and/or that there are appropriate measures in place to protect nesting bird interest on site. Any such written confirmation should be submitted to the Local Planning Authority by the ecologist.
 - No external lighting is proposed, and I suggest this is also secured by way of appropriate condition.
 - The recommendations within the vehicle management plan should be secured by way of appropriate condition.

(9 August 2023) No Objection.

Further to my previous comments, dated 6 July 2023, in which I objected due to the lack of survey information for the sheds which will be demolished, we have now received an updated bat survey report:

- Smart Ecology, Bat Survey Report, ref 2022-069, dated 26 July 2023.

The report has been updated to include the results of an emergence survey of the bungalow and internal inspections of the sheds in July 2023. The methods presentation of results and recommendations within the report are satisfactory. The sheds were identified as providing suitable night or feeding roost opportunities within the Preliminary Ecological Appraisal (Seasons Ecology, SET_485.01, 16 March 2022). An internal inspection during the active season was recommended if any impacts on the buildings were anticipated. Therefore, given they are now proposed for demolition, Smart Ecology undertook an inspection both before and after the emergence survey on 18 July 2023 to look for bats or evidence of bats, particularly droppings/or feeding remains. No bats or evidence of bats were identified within the sheds. It was therefore concluded that they are not used as night or feeding roosts. I have also discussed this with the ecologist who undertook the survey to ascertain how easy it was to check the buildings for evidence and he is confident that signs would have been visible and the buildings are not being used by bats. I can therefore remove my objection.

Please refer back to my previous comments for recommendations, which remain relevant.

Somerset County Council Lead Local Flood Authority – (25 August 2023) We believe that this is a minor application as there are less than 10 dwellings. As this is a minor application, and falls below the requirements for LLFA statutory consultation, the LLFA has no comments to make regarding this application. However, if there is anything specific that you require the LLFA to comment on, please let us know.

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COMMENTS MADE FOLLOWING 6 DECEMBER 2023 AMENDMENTS

South West Water – (6 December 2023) As the site is outside our catchment, South West Water has no comment or concern.

Devon & Somerset Fire & Rescue Service – (6 December 2024) With reference to your letter dated 06 December 2023 concerning the above application, the details of the proposals have been examined and the following observations are made:

The proposal must comply with the functional requirements of Approved Document B of the Building Regulations. This includes access requirements for Fire Service Vehicles (B5). These include vehicle access, including minimum road widths, turning facilities for fire service vehicles and maximum reversing distances of 20 meters. I refer you to our website (<https://www.dsfire.gov.uk/about-us/fleet-and-equipment>) for the size/weight of the current appliances that Devon and Somerset Fire and Rescue use.

In addition, the provision of appropriate water supplies for firefighting (Street Hydrants) including appropriate flow rates will need to be achieved. Information on this should be sourced from the National guidance document on the provision of water for firefighting (3rd edition; Jan 2007).

Somerset County Council Lead Local Flood Authority – (11 December 2023) We believe that this is a minor application as there are less than 10 dwellings. As this is a minor application, and falls below the requirements for LLFA statutory consultation, the LLFA has no comments to make regarding this application. However, if there is anything specific that you require the LLFA to comment on, please let us know.

SCC Highways Authority – (12 December 2023) Standing Advice.

Exmoor Natural History Society – (18 December 2023) Exmoor Natural History Society objects to this planning application for the following reasons:

Bats

It should be considered whether a Habitat Regulations Assessment is needed because although the proposed development is small scale it is in a sensitive area being within or adjoining 2 SAC zones (Exmoor Heaths and Exmoor & Quantocks Woodlands) and adjoining and within the impact zones of 2 SSSIs (Exmoor Coastal Heaths and Porlock Ridge & Saltmarsh). There is known to be heavy Barbastelle bats foraging activity around the coastguard building at Hurlestone Point which is near to the site and the whole area is likely to provide foraging for them. Further surveys should be done and data should also be obtained from the Somerset Environmental Records Centre (SERC) to find species records for this sensitive area covering at least a 2 km radius of the site. This would help with assessing the likely impacts of the development.

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We are extremely concerned that this development is expected to cause the destruction of 2 bat roosts – a Common Pipistrelle day roost and a Lesser Horseshoe day roost. Bats could also be killed/injured while works are being carried out unless mitigation is implemented.

Lighting

There is no lighting assessment provided for this development as no external lighting is proposed. However the large windows proposed in this plan will spill a lot of light which could affect foraging and commuting by bats, particularly Horseshoe bats which are very light sensitive. Activity surveys should be done to determine how important the site and adjacent habitats are for bat activities. An EPS mitigation licence from Natural England would be required before any works can proceed.

The timing of works on this development is very restricted as during the winter access can often be impossible due to high water levels making the ford impassible for vehicles. During the spring/summer months although access may be easier the detrimental effect on wildlife would be significant with impacts on nesting birds as well as bats and other woodland species.

Change of Access arrangements

The increased use of the entrance to the north of the site by the changes to the parking arrangements would result in more disturbance to any wildlife and increased risk to the numerous walkers using this path. We are also concerned about the disturbance to the river bed by the number of crossings of the ford which would be necessary to take and remove materials to/from the site.

Exmoor Wildlife Checklist

We would query the completion of Section 2 of this checklist as the site is adjacent to two SSSIs and two SACs all of which WILL be impacted by this development and the form has not included this. There will also be an impact on Woodland/Trees which surround the site and this has also not been recorded on the form.

South West Coast Path Association – (19 December 2023) This representation is on behalf of the South West Coast Path Association, the charity that supports the South West Coast Path National Trail (SWCP), provides information on the route for the public and raises funds for improvements.

The Association is dedicated to ensuring the SWCP benefits from the best possible environment, as befits a route of national importance. The Association notes the newly amended version of this application. However, the impact on the integrity of the SWCP remains as with the previous applications, and the Association maintains its position as expressed for those applications. The proposal is for a building which is significantly larger and more prominent than the existing building, and would thus result in an adverse environmental impact on the SWCP and consequently its users.

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In this context, in policy terms Exmoor National Park Local Plan policy HC-D17 requires that a replacement dwelling should reflect the massing and scale of the original. This requirement is not met by this proposal.

Further, the proposal requires use of the SWCP as a means of vehicular access. It is accepted that such rights may legally exist, but active use of such rights resultant on the proposal would impact on the character of the route and introduce a safety issue for users which is not currently experienced. These issues would be exacerbated during the construction phase, when substantial amounts of material would need to be transported along the SWCP.

Given the above issues impacting on the environmental integrity of the SWCP, the Association objects to this proposal.

The Association notes with concern that the Planning Officer's report on the earlier version of this application claimed that no comment had been received from the Association, this in spite of the fact that the Association had formally objected to all three previous iterations of this application. The Association would hope and expect that this current objection is reported and considered appropriately.

Natural England – (19 December 2023) Thank you for your consultation.

Natural England has previously commented on this proposal and made comments to the authority in our response dated 26/06/2023, reference number 435431.

The advice provided in our previous response applies equally to this amendment. The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal. Please ensure due consideration is given to:

Priority habitats and Species

Priority habitats and Species are of particular importance for nature conservation and are included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. A list of priority habitats and species can be found on Gov.uk.

Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found here.

Public Rights of Way and Access Officer – (22 December 2023) Thank you for consulting me on the above application. I have already commented twice before on the original application (6/29/21/121) and would ask that all these previous comments are referred to please.

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Public bridleway WL21/6 runs along Hurlstone Lane which also coincides with vehicular access to the development site. The bridleway also carries the South West Coast Path National Trail, soon to formally become part of the King Charles III England Coast Path.

Looking at the new application, I have the following comments to make:

1. I am pleased to see that the parking area has been moved off the bridleway as this was a major cause of concern for the safety of users of the bridleway/South West Coast Path.
2. Under section 01.2 Vehicular Access of the Planning Statement, I am pleased to see that my previous advice has been taken on board and that “the public right of way will remain open and safe to use at all times during construction”.
3. The Construction Method Statement seems to adequately address the concerns I expressed in my original comments about construction traffic mixing with the public using the bridleway. I would like to repeat my request that deliveries during construction are not permitted on Saturday mornings as this is a very popular time for bridleway/South West Coast Path use.

I have also repeated my general advice for development in the vicinity of public rights of way below.

Public rights of way should be open (easy and safe to use) at all times.

Please note the following:

- Care should be taken to avoid obstructing or interfering with the public rights of way or creating a hazard for users. If it is impossible to avoid interference or potential danger, the appropriate legal steps (e.g. path closure application) should be taken in advance of any works. If this is likely to be necessary, please contact ENPA (who act on behalf of the Highway Authority) or seek legal advice as soon as possible.
- Any disturbance to the surface of rights of way should be avoided but if any such disturbance does occur due to the owner/occupier or their agents' use of the way, the surface should be reinstated.
- Where planning permission is granted, this does not authorise any person to stop up or divert any public right of way. Separate legal steps are needed for this.
- The driving of a vehicle is only permitted on a public bridleway/footpath where the driver has lawful authority to do so.
- Parking on the public right of way may be deemed to constitute an obstruction
- Changes to the surface/drainage of a public right of way require prior authorisation from the Highway Authority (in this case ENPA as its agent).
- New furniture (e.g. gates) being needed along a public right of way require prior authorisation from the Highway Authority (in this case ENPA as its agent). Where an increase in vehicular traffic or other alteration in the private use of a public right of way this route is expected as a result of the development, there will be other considerations such as the impact on the maintenance requirements of the right of way.

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CPRE – (2 January 2024) 1. The amended plans convey minimal information. We cannot see an updated Planning Statement. The Drawings P.006 and P.015 are unhelpful, as they contain cursory and meaningless comments such as 'Position Bungalow', 'Bungalow length reduced' and 'Parking Annotation'. They appear not to be drawn to scale as they are stamped 'Do not Scale. All dimensions to be checked on site'. No measurements or visual comparison are provided to show by much the bungalow length has been reduced, but it appears to be a minimal reduction. In the context of the previously proposed 88% increase in frontage compared to the existing bungalow, the reduction now in bungalow length appears to be insignificant.

2. The building continues to resemble five buildings including the boiler-house. It would be highly visible in the landscape. The stepped design does not 'minimise visual impact'. If it did, that argument would justify an even larger frontage than the 88% increase now proposed.

3. The 88% increase in frontage would change the character of the location from remote and tranquil with a modest workman's bungalow to one of a designer house location with cars and delivery vans plying up and down the national coastal path.

4. The tests in the Replacement Buildings policy as regards scale, massing and footprint have clearly not been met, and there is no rational justification for departing from the Local Plan given the high landscape sensitivity of this location..

5. The over-arching policy requirement is GP1-Achieving National Park Purposes and Sustainable Development. This specifically says that all proposals for new development will demonstrate that they do not conflict with other policies in the Local plan.

6. Other overarching policies are relevant eg CE S2-Protecting Exmoor's Dark Skies. The proposed fenestration is 5X as much as in the existing bungalow. The light spill will be visible for miles. The large proposed increase in frontage and extensive fenestration conflicts with CE-S1 -Landscape and Seascape Character, and CE-D1 - Protecting Exmoor's landscapes and Seascapes.

Conclusion

The proposal should be refused so that a new proposal can come forward for a modest bungalow of the same dimensions and appearance as the existing one. If it can only have 1-2 bedrooms due to modern space standards, then so be it.

Wessex Water Authority – (16 January 2024) With no proposal to connect to Wessex Water assets we have no comments regarding the planning application.

Future Landscapes Officer – (12 January 2024) Object.

Amendments to dwelling position and size

The amended plans show the dwelling moved by some 2.5m to the south to provide space for parking immediately to the north of the dwelling. Positioning the parking

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next to the dwelling is an improvement, reducing the apparent linear spread of domestic use. The length of the building footprint does not appear to be any different from the previous drawings, but the external veranda has been omitted from the southern elevation. The width of the rooms at the northern end (bedrooms and bathroom) are shown deeper towards the back of the plot. I understand this discrepancy is being resolved.

These slight changes do not alter the overall scale and massing of the dwelling. Further information in the Planning Statement (submitted in January 2024) provides additional information on the height of the building which will be 1m higher than the existing dwelling, to allow for a steeper pitch to the roof (due to the use of clay tiles).

My concerns over the footprint, scale and massing of the proposed dwelling remain as per previous comments on this application and the withdrawn planning application. The existing dwelling, with its small footprint and low height, does not appear dominant and is visually unobtrusive. In a locality where the nearest development is in Bossington, at approx. 0.5km in distance, and where there is a strong sense of naturalness and tranquillity on this coastal margin, the dwelling is sympathetic in scale, does not impose itself on its remote wooded setting nor detract from the sense of place. The proposed dwelling makes more of a statement in terms of architectural design and detailing and, when combined with the larger footprint, increased height and steep roof, would have a greater prominence in the landscape and a greater impact on the naturalness of the setting, tranquillity and sense of place. The appearance of a small, low-key cabin in the woods would be lost and replaced with a larger, more prominent dwelling that is less sympathetic in scale and has greater impact on the landscape.

Glazing

The full-length fenestration is one of the stand out design features. Concerns have been raised over the amount of glazing and the potential for light spill from internal lighting, particularly from the full height glazing on the western elevation. Without measures to reduce it, light spill in this remote location, where there are no other light sources for quite some distance, would be apparent if curtains or blinds are not fitted or closed at night. Design measures that could be considered include the reduction in the amount of glazing, such as shortening the full height glazing. Other mitigation could include the use of low visible light transmission (VLT) glass and automated internal blinds. Given its location within the Exmoor National Park International Dark Sky Reserve, the development should seek to reduce the impact of light pollution on the dark skies of the National Park.

National Trust – (24 January 2024) Note: These comments supplement our original representation dated 16th June 2023, which provides further context.

Scale and Design

We remain of the view that the proposal would not comply with the policy HC-D17 requirement to “reflect the massing and scale of the original dwelling”. The proposed

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dwelling would be nearly twice as long as the existing bungalow/cabin, and the ridge height of its highest ridge would be notably taller. The external footprint would be 35% greater than the existing. The proposed dwelling would also be made up of four different 'blocks' of building. We continue to favour a simpler scale and form of building, in keeping with the existing.

Landscape and visual

The proposed replacement dwelling – which would be larger, longer and with more windows – is likely to be more visible in the landscape, including from Bossington beach (in winter months) and from the coast path immediately adjacent. We continue to question the reliance being placed on new hedge planting to remove any additional impacts. Site boundaries (and parking) Looking at the amended site plan, we note that the applicant now proposes car parking within the curtilage, adjacent to the dwelling. From our perspective, the parcel of National Trust land to the north – which remains in the red line site boundary – should only be used for access to the applicant's land. We would not want to see any change of use to residential. Site boundaries (and sewerage) The application site also includes the location of the existing septic tank on National Trust land. The application states that this is "...in order for works to progress for the septic tank drainage field. These works have been agreed with the National Trust". However, whilst we understand that a new tank or treatment facility is needed... (a) such works are likely to require planning permission and do not form part of the current application, and (b) the Trust's approval is still required.

Construction access

The applicant's land is accessed via a bridleway track that is in parts steep and narrow, which fords the River Horner (and is impassable at certain times) and is part of the South West Coast Path (which is busy in the summer). We continue to be concerned about the use of the track for construction access and the resultant impacts on people heading to/from Hurlstone Point.

Main river

In respect of the River Horner, the Environment Agency raises no objection, yet this is based on their understanding that "no works are proposed to the existing access route, the river or ford". As per our original representation, we previously advised the applicant that the eroded bank level with the end of the play area wall would need stabilising to allow for construction access to the site.

Conclusion

Our conclusion remains as before:

Having reviewed the current application, the Trust continues to have significant concerns about the size/scale and wider impacts of the proposed development in this sensitive rural location reached via the Coast Path. And regarding construction access and management, and the potential impacts for the local community, visitors and the local environment. We therefore continue to object to the proposed development.

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Wildlife Officer – (17 January 2024) Object.

Overall, the amendments to the proposal, moving the building 2.5m south to provide space for parking spaces adjacent to the dwelling and minimally changing the size and shape of the dwelling do not alter my overall comments made regarding ecology dated 6 July 2023 and 9 August 2023.

However, we have received an objection from Exmoor Natural History Society (December 2023) which must be carefully considered. I have tried to accurately summarise their concerns and have responded to each below:

Bats – due to the site's proximity to two SACs and two SSSIs and the use of the site by bats associated with the SAC (Barbastelle are known to forage around Hurlstone point) we have been asked to consider whether an HRA should be undertaken. ENHS have suggested further surveys and a data search from SERC should be undertaken. They are also extremely concerned about the destruction of two bat roosts – a common pipistrelle day roost and lesser horseshoe day roost.

With respect to the HRA, Natural England have made no objection and have advised us to record no Likely Significant Effect. However, we can continue to consider this in light of the information provided and if an impact from light cannot be ruled out then I agree an HRA should be undertaken.

ENHS are correct that no data search has been carried out, which it could have been. However, the desk study undertaken by the consultant ecologists included records (via EPSLs) of common pipistrelle, greater horseshoe, lesser horseshoe, soprano pipistrelle, serotine, brown long-eared and Natterer's bats within 2km of the site and barbastelle, Brandt's and whiskered bats between 2 and 4km from the site, which is useful information.

ENHS have suggested activity surveys are carried out to assess use of the site by foraging and commuting bats. We do have some information on this from the emergence surveys completed – four surveys were completed at dusk between May and July 2022 and in July 2023 which recorded common pipistrelle, greater horseshoe, lesser horseshoe, soprano pipistrelle, Myotis and serotine bats passing the site. Most activity was from common and soprano pipistrelle. In addition to this, we know that Hurlstone point is important for foraging barbastelle bats. These species can therefore be assumed to be present on site.

Bat activity surveys in relation to SAC bats are usually triggered by proposed changes to foraging or commuting habitats. In this instance, subject to avoidance of external lighting/light spill, there will not be a significant effect on foraging or commuting habitat. However, concerns have been raised about light spill (below) and I do think we need to consider this further, particularly given the sensitivity of barbastelle and greater and lesser horseshoe bats to light.

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The loss of two bat roosts is unfortunate, but the appropriate process has been followed here and I therefore cannot object to this. The surveys have been undertaken in accordance with current guidelines and appropriate mitigation has been incorporated into the proposals which should provide suitable roosting opportunities for the species affected (common pipistrelle and lesser horseshoe) in the long-term. A licence will need to be obtained from Natural England prior to the start of works which would otherwise cause an offence.

Lighting – ENHS point out there is no lighting assessment provided as no external lighting is proposed. However, they raise concerns about the potential impacts of light spill from the large windows on the western aspect of the building and the affect his could have on foraging and commuting bats. Activity surveys are suggested to determine the importance of the site and adjacent habitats for bats.

ENHS are right to highlight the extent of glazing on the western aspect of the house particularly, with large full-length windows. Could the applicant consider reducing this glazing, for example, through reducing the height of the windows?

If further information can be provided to show that there will be negligible light spill due to the design of windows, design of internal lighting and mitigation measures such as automated blackout blinds and/or low transmission glass then I do not think further assessment is needed. However, if significant light spill cannot be ruled out then, further surveys and an HRA should be considered.

I therefore recommend that a lighting assessment is requested which demonstrates the design type for internal lighting, the glazing proposed (including the anticipated VLT) and the window coverings proposed. If this shows unacceptable light spill levels or is not possible then a further assessment is likely to be required.

Timing of works – it is noted that works will be very restricted during winter due to high water levels making the ford impassable, however during summer months when the ford is likely to be passable, the works will have a greater impact on nesting birds, bats and other wildlife.

The crossing of the ford is something that has concerned me during the application process, but the practicalities of whether the site is accessible during winter is not something I think I can consider from my position.

Representations

6 letters of SUPPORT have been received as part of initial consultation, including a letter from Exmoor Young Voices. The comments in support include:

- The exodus of young workers and families from the Park has become a serious problem affecting hospitality, agriculture, environment, business, the professions, housing, communications, population balance, education, and small communities.

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- A self-build, low cost, low carbon, off grid eco project of the type proposed for Hurlstone Bungalow is now almost the only way, other than by living at home or on the farm, for local young workers, talent, and families to remain on Exmoor.
 - Every effort needs to be made by authorities and rural communities, rather than proliferating new sites, to support rebuild and conversion projects of this nature. If not, then second homes, holiday cottages, Airbnb will proliferate leaving an elderly population without services, young workers, and community facilities.
 - A self-build home, as here, also needs to have generous outdoor space, covered and open, for local working practices - wet outdoor clothing, tools, animals, vehicles - as well as for children's play and growing produce.
 - EYV commends this regeneration and renewal project, and hopes that all concerned will support a vital development for a young, local family.
 - The building has been deteriorating, unattractive and in decline. It is as it stands ecologically utterly unsatisfactory.
 - The 30% increase in size would be perfectly reasonable.
 - It is a sympathetic design with some notable improvements in materials.
 - The proposal shows that sustainable and vernacular design can be combined successfully in protected areas such as Exmoor.

29 letters of OBJECTION have been received as part of the initial consultation, including letters from the same person, and a letter signed by 58 households in the Selworthy and Minehead Without and Porlock parishes. A letter from a group of 62 households has also been received dated 2 October 2024, which was sent to Committee Members. The letters raised concerns including:

- The landscape is beautiful, and the proposal would be harmful to character and appearance.
- Concern regarding ecological impact, including bats, birds, butterflies and other insects.
- The building has been uninhabited for some time.
- Noise and disruption, and effect on users of the South West Coast Path.
- Over development of the site.
- The new building would be larger and more visible causing harm to its surroundings.
- There is no justification for the development.
- Concern regarding access and disruption as a result of vehicles accessing the site, including through the construction period.
- The existing track is currently little used by vehicles.
- The track is narrow and has no passing places, leading to potential conflict between vehicles and users of the public right of way.
- Concerns regarding liability if an accident occurs on the access.
- Detrimental impact on landscape and wildlife.

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- The proposed outbuilding also leads to increase in scale of development leading to greater harm.
 - Contrary to Local Plan policy, including Policy HC-D17.
 - The area is quiet and dark, frequented by bats, insects and birds. Extra light would be harmful.
 - If planning permission is granted it should only be on the same footprint.
 - Poor design and loss of trees.
 - There has not been parking in the adjacent field before.
 - The west facing full length windows and solar panels are all at odds with policy.
 - The stepping of the roof actually makes the proposed development look like four dwellings.
 - Changes in this application do not address the primary concerns.
 - Issues regarding feasibility of parking.
 - The applicant's own Landscape Viability Assessment is not a full LVIA.
 - The application should be accompanied by a satisfactory scheme for surface water drainage.
 - A lighting assessment is required.
 - Concerns regarding the suitability of the septic tank.
 - Harm to landscape character, the Heritage Coast and Dark Sky Reserve.
 - Mass and scale, and visual impact concerns.
 - Concerns regarding accuracy of plans.
 - The existing building is relatively inconspicuous because it is painted dark green.

41 letters of OBJECTION have been received as part of the reconsultation following amended plans on 6 December 2023, including letters from the same person, and two letters from households in the Selworthy and Minehead Without and Porlock parishes, one letter signed by 93 houses and one letter signed by 100 households. The letters raised concerns including:

- Apart from not using the National Trust land, this is basically the same mass and scale with large windows creating light pollution.
- Harm to landscape. It would be a blot on the landscape, clearly visible from the beach below and harmful to users of the South West Coast Path.
- Concern regarding safety of users of the public right of way.
- Access concerns/access is inadequate. Erosion of the lane will be substantial and unpredictable.
- As well as a National Park, the site lies in the Heritage Coast, Special Area of Conservation, SSSI and section 3 Moor and Heath.
- The bungalow and boiler room would be much larger than the current building, particularly in frontal areas in views from the path.
- Reference to long standing use of the track by traffic is misleading. Very few vehicular access journeys were made by previous occupants.
- The proposal to use lay-by's on the A 39 for transfer and storage of materials clearly shows that the construction site is too small and unsafe.

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- Access through Bossington village would be severely affected and is unsafe for construction vehicles particularly from Easter to October during the tourist season.
 - The proposed building continues to be significantly larger than the footprint and frontage of the original and its scale and visibility makes it inappropriate for its location on this iconic and unique stretch of National Park coastline.
 - I understand from responses made by the Head of Planning at the Porlock Consultation meeting on 20 October that the ENPA approach on GIA is only to include the main building and not the boiler shed in the comparison with the existing property. My view is that, in this case, the boiler shed is an integral part of the residential accommodation, albeit sited separately. Other sheds or garages for which the planning policy HC-D16 (Outbuildings) applies are usually not so critical to the residential space.
 - The proposed main building and boiler house will significantly increase the sense of mass and scale of the property as viewed from the footpath.
 - The demolition and construction of the new dwelling will affect the use of the tranquil, nature filled path over a considerable length of time due to access constraints and subject to weather conditions.
 - The ford is impassable on occasions during the year due to heavy rain.
 - Development scheme would be contrary to Local Plan Policies CE-S2, HC-D16 and HC-D17.
 - The existing building doesn't have an adverse visual impact, and is much admired by the large number of passers-by who use the track in front of the building.
 - There are design errors on the submitted drawings.
 - This change in massing will be most notable from the west, the elevation seen by people on the track and beach. The existing building has a west frontage of 48 sqm, whereas the proposed building has a west frontage of 96 sqm.
 - The proposed building's footprint aspect ratio is 3 to 1 (length to average width) (long and thin), whilst the existing building's footprint is only 1.3 to 1 (nearly square).
 - The existing dwelling has a volume of 257 cu m (excluding veranda), and the proposed boiler shed 93 cu m - 36% that of the existing dwelling. The west frontage of the existing building is 48 sqm, and the west frontage of the boiler shed 30 sqm – 63% of the existing building. It seems to me that if just the shed of a proposed application is over a third the volume, and nearly two thirds the frontage of the existing house, then the scale of the overall proposal is too big.
 - The proposed west frontage has 4.3 times as much glass as the existing west frontage, and this coupled with the much brighter lighting that will be used, will introduce light pollution where previously there was very little.
 - The submitted drawings aren't consistent enough (dimensions of some elements vary from view to view), or detailed enough for such a sensitive site (for instance, no gutters or downpipes are shown).

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- For such a sensitive site the submitted drawings are too ambiguous and not detailed enough to allow for an informed planning decision to be made, or for a house to built.
 - Disagree that it was ever occupied as a holiday home. The property is abandoned and now part of nature no further planning should ever take place here.
 - The standby generator will be needed for more than 50 hrs per annum.
 - As a new soakaway system is needed/proposed; the existing, single chamber septic tank will need to be replaced and must confirm to the latest building regulations.
 - There is a need for a full and detailed assessment of the additional amount of roof and hardstanding (both of which are considerable) and how it will be dealt with to ensure no runoff to adjoining land in storm events taking tested infiltration rates into account. The site lies directly above the South West Coast Path and there is a significant danger that excess surface water will end up on the path potentially eroding it.
 - Although no external lighting is proposed given west-frontage fenestration of the current design is almost 5 times greater than the existing building we believe the Authority does require a lighting assessment to deal with light spillage from internal lights both from the perspective of the site lying within a Dark Skies Reserve and the presence of “rarer and more light sensitive species [of bats] such as greater and lesser horseshoe bats” [Ali Cockburn Wildlife Conservation Officer 6 July 2023].
 - We are curious to understand how a property reliant on “spring fed water” (described as barely a trickle by previous occupants) and a yet-to-be-dug bore hole can provide security of water volume and pressure to supply a sprinkler system which will be paramount given fire vehicles will not be able to reach the site.
 - The building continues to resemble five buildings including the boiler-house and is highly visible in the landscape. The stepped design does not minimise visual impact of the proposed development.
 - The increase in frontage changes the character of the location from remote and tranquil with a modest workman’s bungalow to one of a designer house with vehicular traffic using what is essentially a pedestrian pathway comprising part of the coastal path.
 - The over-arching policy requirement is GP1-Achieving National Park Purposes and Sustainable Development. This specifically says that all proposals for new development will demonstrate that they do not conflict with other policies in the Local plan. It is not clear that this is the case.
 - The Exmoor Natural History Society suggest that a Habitat Regulations Assessment is needed.
 - The planning statement says that the roof height above the main living area, has to be raised, in respect to the existing roof height of the existing building, in order to meet building regulations. Surely this building regulations requirement can be met by lowering the existing ground level so that the 'new roof line' is no longer higher than the existing building.

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- Condition 2(c) of the Policy requires replacement dwellings to reflect “the massing and scale of the original dwelling”. Given the most recent changes to the proposed building are barely perceptible in terms of length, height and width, the design still necessitates nearly doubling the length of the original building, and a projected surface area of walls and roof of the existing building’s west elevation that is 2.4 times the original. Therefore, we believe this condition is not met.
 - Of concern is the group’s recent discovery that the actual height of the existing bungalow is significantly lower than originally portrayed by the applicant. Having measured the bungalow using a Leica Disto scanner under the direction of a skilled professional, we believe the ridge and chimney heights are respectively 0.8m and 0.8m lower than shown in the applicant’s original drawings. Critically, this means the ridge of the proposed building at its highest point would be 1.8m higher than the current ridge height, and the chimney 0.9m higher.
 - We believe the red line on the location plan has been draw incorrectly. Our understanding is that any area impacted by the development needs to be marked in red, and any additional land owned by the applicant in the vicinity marked in blue. Thus, the red line marked on the location plan should only encompass the route of access across the adjacent field to the north, which is owned by the National Trust. In their objection dated 25 January 2024, the Trust themselves say: “From our perspective, the parcel of National Trust land to the north – which remains in the red line site boundary – should only be used for access to the applicant’s land. We would not want to see any change of use to residential.” To ensure the residential planning unit is not extended, we request the red line on the location plan be amended. In addition, given the sheds in the field are no longer shown on the amended proposed site plan, and the applicant indicates he will be planting a hedge along the boundary where the sheds would have been, confirmation is required that the applicant will not be removing the sheds owned by the National Trust.
 - The applicant has amended the SuDS supporting information document and added soakaways to the amended proposed site plan. We reiterate there is a need for a full and detailed assessment of the volume of water from the additional amount of roof and hardstanding (both of which are considerable), and how it will be dealt with to ensure no runoff to adjoining land in storm events, taking tested infiltration rates into account. Simply drawing a soakaway on a plan does not address this issue – we would hope the applicant would seek to understand if a soakaway would work.
 - We believe there is an urgent need for a lighting assessment given the huge increase in full-height fenestration on the western elevation (at least a fourfold increase).
 - Once again, revisions to the application do little to address the significant objections identified above, many of which fundamentally rest with the design of the building. We understand policy exists to ensure that replacement dwellings are an enhancement to the special landscape

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qualities of the National Park. Surely exacting care and rigour should be taken with this application given the fragility of the beauty and ecology of the site.

Policy Context

EXMOOR NATIONAL PARK LOCAL PLAN 2011 - 2031
GP1 Achieving National Park Purposes and Sustainable Development
GP4 The Efficient Use of Land and Buildings
CE-S1 Landscape and Seascape Character
CE-D1 Protecting Exmoor's Landscapes and Seascapes
CE-S2 Protecting Exmoor's Dark Night Sky
CE-S3 Biodiversity and Green Infrastructure
CE-S4 Cultural Heritage and Historic Environment
CE-D2 Green Infrastructure Provision
CE-S6 Design & Sustainable Construction Principles
CC-S1 Climate Change Mitigation and Adaptation
CC-D1 Flood Risk
CC-S5 Low Carbon and Renewable Energy Development
CC-D5 Sewerage Capacity and Sewage Disposal
CC-S7 Pollution
HC-S1 Housing
HC-S2 A Balanced Local Housing Stock
HC-D16 Outbuildings
HC-D17 Replacement Dwellings
AC-S1 Sustainable Transport
AC-D2 Traffic and Road Safety Considerations for Development
AC-S3 Traffic Management and Parking
AC-D3 Parking Provision and Standards
RT-D12 Access Land and Rights of Way

The National Planning Policy Framework (Framework) is a material planning consideration.

Planning Considerations

The main planning issues in this case are whether the principle of the development is acceptable having regard to matters of 'abandonment' and Local Plan policy, the effect of the proposed development on the character and appearance of the surroundings, ecology, flood risk and drainage, and access.

Principle

The existing dwelling is in a poor state of repair and has not been occupied for some years. Whether the use of the site as a dwelling has been abandoned has been

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raised by some interested parties. Having regard to this, it is reasonable for the Authority to consider whether it has been abandoned as part of this application.

Abandonment is a legal concept used by the courts to describe the circumstances in which rights to resume a use which has been lawfully carried out in the past, may be lost because of the cessation of that use. Assessments of whether 'abandonment' has occurred is a matter of fact and degree.

Case law has established that the cessation of a use is not the same as abandonment. Merely ceasing to use the building for residential purposes does not amount to abandonment of that right.

The applicant has submitted a statement of historic use. The more recent history of the building has included the occupation of the dwelling from 1982 to 2006. During this time the building was occupied as a tenancy from the KI Robins Will Trust. From 2006 until 2010 it is reported that the building was used as a holiday home before being let under an assured short-hold tenancy. In 2011, works were carried out to the building to replace windows, insulation and solar panels as well as improvements to the water supply. The agreement for short hold tenancy ended in 2013, after which it was used as a holiday let. In 2016 the building was subject to vandalism, with windows and doors being broken and wider internal damage. Evidence has been provided of the reported incident and subsequent insurance claim. Repairs were carried out to the property in December 2016. Further evidence has been provided that during 2016 to 2019 various visits were carried out and emails sent to the insurance company regarding the damage caused by vandalism. The insurance claim was settled in August 2019. The COVID-19 pandemic prevented any further work being carried out and the applicant then entered into pre application discussions with the Authority in 2021.

The four factors that have been established as relevant to an assessment of abandonment are:

- The physical condition of the building;
- The length of time which the building has not been used;
- Whether it had been used for any other purposes; and
- The owner's intentions.

The existing dwelling dates to the 1920s. It is in a poor state of repair and has been vacant since 2016 when significant damage to the building occurred. Nevertheless, the building has four complete walls and a roof, which appear solid but in need of repair and maintenance. Officers have noted that gas bottles appeared to provide a gas supply to the property and the electricity connection was evident even though it is understood to be disconnected.

There are footings for a garage building which was granted planning permission in 2002. However, no walls or other meaningful development for the garage is apparent.

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No other use of the site appears to have taken place since the use of the dwelling ceased in 2016.

The onus of proof rests on the applicant and the test to be applied in this case would be the “balance of probability”. Case law has established that abandonment considerations rely on the balancing of the four factors outlined above. Having regard to the evidence available, the building has been used for residential use. It is capable of repair and restoration to continue a residential use of the site, and the applicant had no intention to abandon the residential use of the site.

As such, it is concluded that even though the property has been unoccupied, on the balance of probabilities, the residential use of the building and site has not been abandoned and the use of the site as a dwelling is lawful.

Having regard to the above, Policy HC-D17 of the Local Plan permits the erection of a replacement dwelling. Whilst detailed elements of the proposed scheme are considered below in this report, the principle of development is acceptable in accordance with Policy HC-D17.

Character and appearance

The landscape within the vicinity of the application site consists of open countryside comprising woodland along the lower hill slopes with moorland on higher ground, overlooking enclosed farmland within a coastal setting of Exmoor’s Heritage Coast. The site lies away from the settlement of Bossington. The naturalness of this coastal margin, as well as a marked lack of built development, combine to contribute to a prevailing sense of tranquillity, natural and undeveloped character.

Whilst the existing dwelling lies alongside and would be visible to users of the South West Coast Path, it is relatively plain, low in height and modest in scale and appearance. These factors, together with its established nature, goes some way to help the bungalow visually fit into its setting.

Policies CE-D1 and CE-S6 of the Local Plan, amongst other things, require that development delivers high quality sustainable designs that conserve and enhance Exmoor’s landscapes and the distinctiveness of Exmoor’s built environment. Policy CE-S2 refers to Exmoor’s dark night sky and advises that, amongst other things, the tranquillity and dark sky experience of Exmoor National Park Dark Sky Reserve and the National Park as a whole, will be maintained and improved.

These policies are consistent with the Framework and the protection of the National Park and have regard to the purposes of designated National Parks and their status.

Policy RT-D12 relates to safeguarding access land and Rights of Way in terms of their condition, users’ interests and character and appearance. Where proposals would adversely affect the network, it will be necessary to meet a number of criteria

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including that there is a need for the development, that there is no appropriate alternative location, and any harm will be kept to a minimum.

The replacement dwellings policy, Policy HC-D17, of the Local Plan requires that the replacement dwelling be sited on or close to the footprint of the existing dwelling, unless an alternative position can be justified. It requires that the replacement dwelling be no larger than the original dwelling or 93 square metres gross internal area, that it reflects the massing and scale of the original dwelling and accords with Policy CE-S6.

Some interested parties have disputed the accuracy of the submitted plans, including the accuracy of the drawings depicting the elevations of the existing dwelling. Consequently, the applicant has submitted revised existing elevation drawings, which show the dwelling to have a lower height than initially shown. According to the east elevation drawings, there would be more than 1.5 metres difference in height at the tallest part of the roof between the existing and proposed dwellings. The proposed dwelling would also be more than nine metres longer in its west elevation.

The development scheme would be over the footprint of the existing dwelling and would not exceed 93 square metres. It would be constructed from a timber frame with timber cladding, consistent with the existing dwelling. It is acknowledged that the applicant intends to relocate the pedestrian entrance to the site to help conceal the dwelling and create a sustainably constructed dwelling. However, the proposed three-bedroom house would be taller than the existing dwelling with a stepped roof, it would have an elongated form and would constitute a substantial increase in size and scale of house on the site. The relative modesty of the residential building scale and appearance would be lost from the site. In combination with its scale and mass, the house's stepped and longer form, and more extensive fenestration would draw the eye.

Within the predominately natural and undeveloped setting of this remote site, these factors would emphasise the proposed dwelling's presence, and would result in a visually jarring intrusion of conspicuous built form within the countryside setting. Moreover, even though no external lighting is proposed, the greater potential for light spill as a result of the more extensive fenestration would lead to greater potential for the dwelling's presence to be emphasised particularly during winter months and darker evenings. This would erode, and so fail to conserve, the area's predominantly natural, tranquil and undeveloped landscape character, and lead to harm of the dark sky.

Even though a condition could require the submission of alternative glazing for the windows, no details are before Officers to consider. As such, Officers are not satisfied that this would address the harm identified.

The applicant has provided a Landscape Viability Appraisal which assessed the proposed development from several viewpoints. However, despite this, the adverse

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impact of the proposed development would be particularly noticeable from the South West Coast Path, which passes alongside the site offering clear views up into the development, as well as from wider views, including from Bossington Beach through views between trees.

The applicant has advised that, in addition to retained vegetation, additional landscaping around the site boundaries would be carried out. However, given the conspicuous scale and appearance of the proposed scheme and the open character of the site from the South West Coast Path, as well as the potential limitation in screening effectiveness of tree and hedge planting, with potential seasonal leaf fall, the visually softening effect of landscaping on the proposed development would be limited. Moreover, with any new planting, its longer-term management and survival is not guaranteed. As such, Officers are not persuaded that the proposed landscaping would be effective in concealing or significantly softening the proposed development or significantly reducing the visual and perceptible impact.

Even though there is an extant planning permission for a garage building on the site and existing sheds in the field to the north would be demolished, this would not outweigh the harm caused by the proposed dwelling and its outbuilding.

For the above reasons, Officers conclude that the proposed development would have a significantly harmful effect on the character and appearance of the surrounding area. In this regard, the proposal would be contrary to Policies GP1, CE-S1, CE-S2, CE-D1, RT-D12 and HC-D17 of the Exmoor National Park Local Plan. Together these policies, amongst other things, seek high quality in terms of design that respects and complements local character and the character and appearance of the National Park landscapes, including tranquillity and dark sky experience of Exmoor National Park as a whole, and the interests of users of public rights of way.

Ecology

The site lies directly adjacent to Exmoor Coastal Heaths SSSI and around 60m from the boundary of Exmoor Heaths SAC. The Conservation of Habitats and Species Regulations 2017 (as amended) (the Habitats Regulations) require that permission may only be granted after having ascertained that it will not affect the integrity of a European site, such as the SAC.

The site has been identified as comprising a bungalow and shed within a landholding which comprises semi-improved grassland, scrub, trees, introduced shrubs and hedgerows with fencing and retaining walls. The bungalow was identified as having high suitability for roosting bats and has been found to support a summer day roost for low numbers of common pipistrelle bats and a summer day roost for low numbers of lesser horseshoe bats. The shed and other outbuildings provided night roosting opportunities.

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Appropriate recommendations have been included in the survey reports including that a European Protected Species Licence would be required prior to works commencing that would otherwise cause an offence with bat mitigation including a compensatory bat roost in the roof of the boiler shed; construction environmental management plan; precautionary methods of work with respect to dormice; a pre-commencement survey and careful working methods with respect to badger; consideration to the nesting bird season; precautionary methods of work with respect to reptiles; safe removal and disposal of three-cornered leek, which would prevent spread of invasive non-native species.

The desk study undertaken by the consultant ecologists included records of common pipistrelle, greater horseshoe, lesser horseshoe, soprano pipistrelle, serotine, brown long-eared and Natterer's bats within 2km of the site and barbastelle, Brandt's and whiskered bats between 2km and 4km from the site.

Bat activity surveys in relation to SAC bats are usually triggered by proposed changes to foraging or commuting habitats. In this instance, subject to avoidance of external lighting/light spill, there will not be a significant effect on foraging or commuting habitat. However, concerns have been raised about light spill and the Authority's Wildlife Officer has advised that this matter requires further consideration, particularly given the sensitivity of barbastelle and greater and lesser horseshoe bats to light.

Even though Natural England have made no objection and have advised the Authority to record no Likely Significant Effect, being mindful of other objections that have been received, the Authority would be entitled to continue to consider this matter. If an impact from artificial light cannot be ruled out, then an Appropriate Assessment under the Habitats Regulations should be undertaken.

Whilst no external lighting is proposed, having regard to the concerns raised about the potential impacts of light spill from the large windows on the western aspect of the building and the affect this could have on foraging and commuting bats, there is insufficient evidence to demonstrate that the proposal would have an acceptable impact on statutory protected species. Consequently, the proposed development would be contrary to Policies GP1 and CE-S3 of the Local Plan which together, amongst other things, seek to ensure development does not harm legally protected species, or lead to the loss of or damage to their habitats. It would also be contrary to the Framework's objectives for the protection of biodiversity and the conservation of the natural environment.

Flood risk and drainage

Policy CC-D1 of the Local Plan states, amongst other things, that proposals will be permitted where they are consistent with the sequential test and where it has been demonstrated that the site has little or no risk of flooding.

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The dwelling itself lies within Flood Zone 1 (low probability of flooding). The proposed development is therefore appropriate at this location. However, the access and egress, near the ford, lie within Flood Zone 3 (high probability of flooding).

The River Horner, through which vehicular access to the site passes, is occasionally impassable by vehicles following prolonged periods of heavy rainfall. A Flood Risk Assessment (FRA) has been submitted as part of the documents supporting the application.

The FRA advises that because part of the access road is located within Flood Zone 3, a site-specific Flood Emergency Plan has been developed for the site as a preparedness strategy designed to mitigate the risks and manage the impacts of a flood event.

The FRA concludes that, as the proposal consists of the erection of a replacement building, there would be no significant increase in surface water runoff from the site. It also considers that the development would not give rise to backwater affects or divert water towards other properties. The FRA demonstrates that the proposal would be safe, in terms of flood risk, for its design life and would not increase flood risk elsewhere.

Moreover, the site has a current lawful use for residential purposes. The proposed development would not materially alter this and, as such, occupants at the proposed dwelling would be at no greater risk from flooding or as a result of flooding.

The Environment Agency have considered the submitted evidence and raise no objection. Whilst it would not override planning requirements, the disposal of surface water is an obligation under Building Regulations and includes a requirement for adequate provision to be made for rainwater from the building. The development would be relatively limited in scale, and the risks associated with surface water flooding are likely to be low.

Having regard to the above, the proposed development is considered to be acceptable in terms of flood risk and drainage. It would comply with Policy CC-D1 of the Local Plan.

Access

Policy AC-D2 of the Local Plan says that development which will cause unacceptable levels of traffic in terms of the environmental or physical capacity of the local road network, or would prejudice road safety interests will not be permitted. Policy RT-D12 states that the public rights of way access network will be safeguarded.

Whilst objections have been received in relation to the adequacy of the existing access track, over which the South West Coast Path passes, and the potential for conflict between vehicles using the track to access the dwelling and other users of the

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Coast Path, the site has a lawful use as a dwelling. As such, even though the existing dwelling has been little used over recent years, it is unlikely that there would be a material increase in traffic movements as a result of the proposed development.

Although it has been explained that an area of track has subsided, there is no substantive evidence to consider that its repair would be anything other than what would be typical maintenance of the track.

Traffic/access management information, including a Construction Method Statement, has been provided in support of the application. This outlines that delivery of materials to the site would be carried out using four wheeled drive vehicles and trailers to minimise the weight of vehicles.

It is understood that the existing dwelling benefits from vehicle access rights. The proposed development would not alter this. The proposal would retain a single dwelling on the site and, as such, there would unlikely be a material increase in traffic to the site. Whilst there may be greater traffic movements during the construction period, it would be possible to agree a Construction Management Plan under planning condition, and any such impact would be temporary.

For these reasons, the proposed development would be unlikely to have a significant or unacceptable impact on the existing access.

Other matters

Concerns have been raised regarding fire safety and the potential for emergency vehicle access. Devon & Somerset Fire & Rescue Service have been consulted and their reply has been outlined earlier in this regard. The need to comply with relevant Building Regulations has been set out. The applicant has advised of the ability to install a sprinkler system within the building. Moreover, it is unlikely that the proposed dwelling would be at any greater risk of fire or subject of more challenging access than the existing dwelling.

The applicant has referred to precedents for development. However, a number of those examples do not appear to be in Exmoor National Park. The example of an off-grid self-build dwelling on Exmoor was for a local need affordable dwelling within a different landscape setting and context of built environment. Accordingly, those cases are of little weight in the consideration of this planning application.

Whilst the applicant has advised the proposed replacement dwelling would be for a local family, there is no mechanism in place to ensure that the dwelling would be occupied by a local family. Even though the works may require Building Regulations approval, there is no substantive evidence to demonstrate that the proposal would not be able to provide an acceptable foul drainage scheme.

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Officers note the applicant's view that the development scheme would have a very low/zero carbon footprint and would include renewable energy generation facilities. There would also be opportunity for improvement to the landscaping of the site. These are benefits of the proposal, albeit the benefits are limited by the scale of the development and would not outweigh the harm identified.

Having regard to the historic use of the site, the development would be appropriate in terms of flood risk and access. However, given the existing dwelling is not as visually prominent as the proposed development would be, this would not outweigh the harm to the character and appearance of the area.

Planning Balance

The starting point for any planning decision is Section 38(6) of the Planning and Compulsory Purchase Act 2004 which requires decisions to be made in accordance with the development plan unless material considerations indicate otherwise.

The scheme would offer an improvement to the National Park's housing stock with a new, modernised low/zero carbon dwelling. Some benefits would be likely to arise as a result of additional planting. Nevertheless, given the scale of development and the potential for increased artificial light spill these benefits attract limited weight.

The proposal would lead to significant harm to the area's character and appearance, and there is insufficient evidence to rule out harm to statutory protected species. As such the proposed development scheme conflicts with the development plan as a whole.

These harms weigh substantially against the proposal. The benefits that would arise would not outweigh the harms identified above. Consequently, the proposal would conflict with the development plan as a whole and there are no material considerations, including the provisions of the Framework, which justify a decision otherwise than in accordance with the development plan.

Human Rights

The provisions of the Human Rights Act 1998 and Equality Act 2010 have been taken into account in reaching the recommendation contained in this report.

Conclusion

On balance, for the reasons given above, the proposal is not considered to comply with the relevant Local Plan policies. Consequently, it is recommended that planning permission be refused for the reasons set out below.

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Recommendation

REFUSE for the following reasons:

1. The development proposed would cause unacceptable harm to the scenic beauty and character of this part of the National Park landscape. The proposed development would therefore fail to comply with policies GP1, CE-S1, CE-S2, CE-D1, RT-D12 and HC-D17 of the Exmoor National Park Local Plan 2011-2031 and would be contrary to Paragraph 182 of the National Planning Policy Framework.
2. Whilst no external lighting is proposed, having regard to the concerns raised about the potential impacts of light spill from the large windows on the western aspect of the building and the affect this could have on foraging and commuting bats, there is insufficient evidence to demonstrate that the proposal would have an acceptable impact on statutory protected species. Consequently, the proposed development would be contrary to Policies GP1 and CE-S3 of the Exmoor National Park Local Plan 2011-2031. It would also be contrary to the National Planning Policy Framework's objectives for the protection of biodiversity and the conservation of the natural environment.

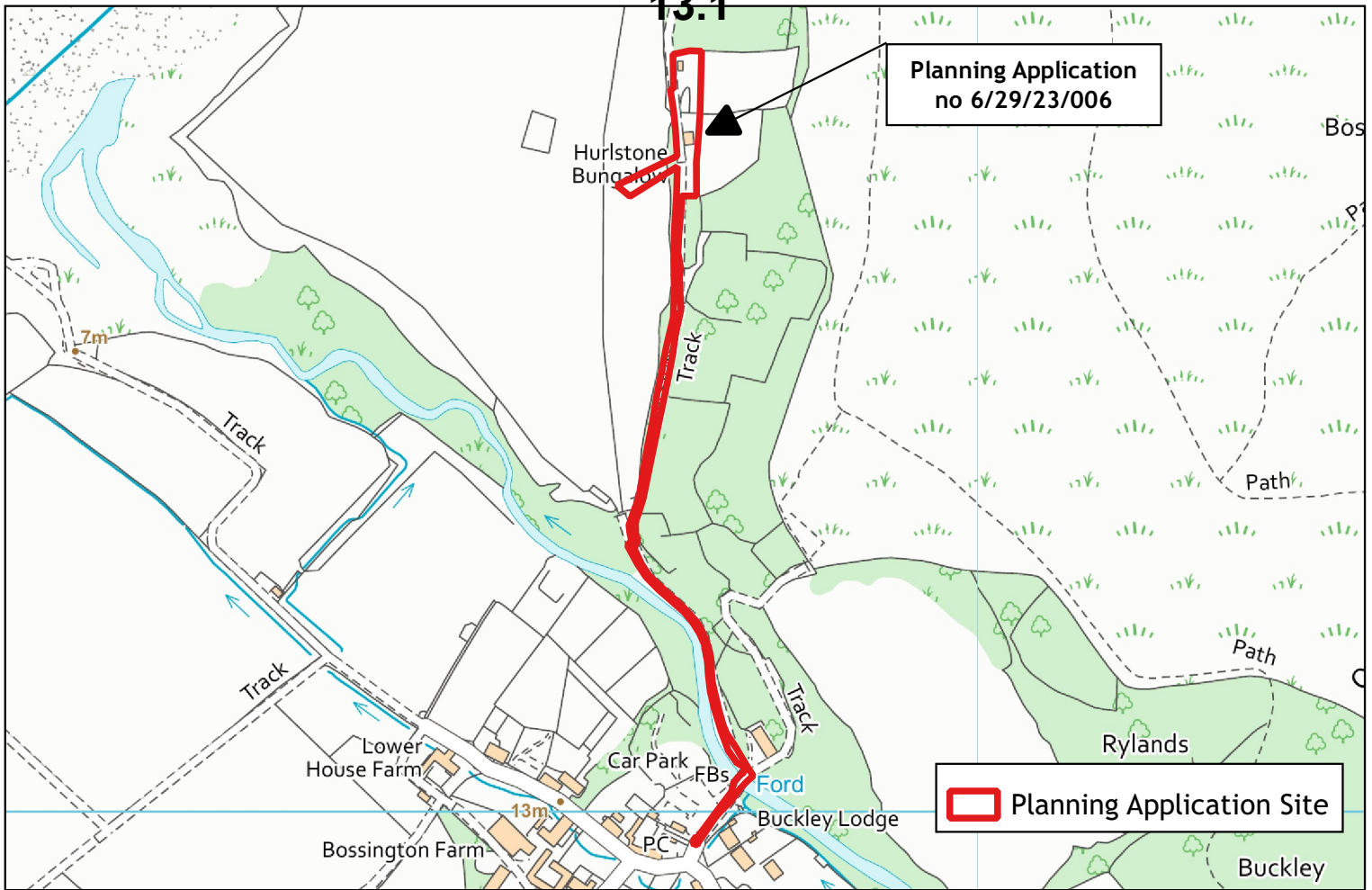
Informatives

POSITIVE & PROACTIVE STATEMENT

This Authority has a pro-active approach to the delivery of development. Early pre-application engagement is always encouraged. In accordance with the requirements of Article 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015, in determining this application, Exmoor National Park Authority has endeavoured to work positively and proactively with the agent/applicant, in line with the National Planning Policy Framework, to ensure that all relevant planning considerations have been appropriately addressed to achieve a positive outcome. However, in this case, matters relating to character and appearance and statutory protected species have not satisfactorily been addressed.

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Planning Application no 6/29/23/006



Site Map
Scale 1:5,000

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Planning Application no 6/29/23/006



Overview Map
Scale 1:20,000

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Committee Report

Application Number:	62/43/23/009
Registration Date:	01-Dec-2023
Target Determination Date:	24-Jan-2024
Extension of Time:	
Applicant	Mr. P Miles, Lynton & Barnstaple Railway Trust
Agent:	Mr. R Auger
Case Officer:	Charlotte Spiers
Site Address:	Woody Bay Station, Lynton & Barnstaple Railway Co Ltd, Parracombe, Devon, EX31 4RA
Proposal:	Proposed variation of condition 2 of approved application 62/43/23/002 to extend the hours of operation (0700 – 1900hrs).
Recommendation:	Approve with conditions
Reason for bringing before Authority Committee:	The Officer recommendation is contrary to the recommendations of Martinhoe Parish Meeting and Parracombe Parish Council

Relevant History

62/43/23/002 – Proposed continued use of Rolling Stock Shed, Water Tank and Miniature Railway Facilities. As approved under applications 62/43/03/003, 62/43/10/002, 62/43/13/001 and 62/43/13/002. – Approved 18 September 2023

62/43/13/002 – Proposed variation of condition 2 (The miniature railway and associated covered rolling stock storage shed hereby permitted shall be sited on site for a limited period only. Before 1 June 2013 the miniature railway and associated covered rolling stock storage shed shall be removed and the site reinstated to its former condition unless a further planning permission is granted) to approved application 62/43/10/002 to permit retention on site of the miniature railway and covered rolling stock storage shed until 1 June 2023. – Approved 29 April 2013

62/43/13/001 – Proposed variation of condition 3 (The locomotive shed and water tank hereby permitted shall be for a limited period only expiring on 1 June 2013 or before which date the building and water tank hereby permitted shall be removed and the site reinstated to its former condition unless a further planning permission is granted before the expiration of such period) of approved application 62/43/03/003 to permit retention on site of the rolling stock shed and water tank until 1 June 2023. – Approved 29 April 2013

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62/43/10/002 – Proposed installation of miniature railway together with covered rolling stock storage shed for railway equipment (part retrospective). As per additional information 10.08.10. – Approved 05 October 2010

62/43/03/003 – 1). Erection of rolling stock shed with adjoining water tank and water crane. 2). Reconstruction of original goods sheds for use as toilets, equipment store and staff rest room as an alternative to that permitted under Application 62/43/95/004. Related external landscaping changes. 3). Construction of underground sewage treatment plant, as amended drawings dated 12/06/03 – Approved 07 July 2003

Site Description & Proposal

The application site concerns Woody Bay Station. The site fronts onto the A39 close to Martinhoe Cross. The site lies in open countryside with a small number of dwellings and a hotel in the vicinity. The Station site lies within the Parish of Martinhoe with the boundary of the Parishes of Parracombe and Lynton and Lynmouth nearby.

Planning permission was granted in March 1996 for the change of use of dwelling to a railway station with associated shop, café/museum uses, erection of locomotive shed and reinstatement of $\frac{3}{4}$ mile of railway track. The planning permission was granted subject to conditions under reference 62/43/95/004.

The popularity of the Station has grown over the years and the site is a popular visitor attraction.

The planning history below shows that the site has developed since the initial application in 1995.

In July 2003 under application reference 62/43/03/003 temporary planning permission was granted for a rolling stock shed with adjoining water tank and water crane, and in October 2010 under application reference 62/43/10/002 temporary planning permission was granted for the installation of a miniature railway together with rolling stock storage shed for the miniature railway for the associated railway equipment. These permissions were extended for a further period of ten years under application references 62/43/13/001 and 62/43/13/002 in April 2013. The period of these temporary permissions expired on 01 June 2023. Permission was granted in September 2023 for the permanent siting and usage of the structures previously granted temporary permission in 2003, 2010 and 2013 (ref 62/43/23/002)

The current proposal is for the variation of condition 2 of approved application 62/43/23/002 to allow for extended hours of usage of the rolling stock/locomotive shed only (07.00 to 19.00).

Consultee Representations

Martinhoe Parish Meeting –

The parish OBJECTS to this application. We are given to understand that the Lynton and Barnstaple Railway Co Ltd missed their deadline for raising funds at the beginning of this year and have to start again from scratch. We therefore do not understand why it would suddenly be necessary to extend their hours of operation for maintenance etc by 3 hours thereby increasing noise inconvenience, particularly for hotel guests and neighbours immediately adjacent. If the railway were to succeed in this application then it would have an immediate invasive and negative impact on the area. There is no reason for this application except to try to increase permissions by stealth; to persistently put in small applications which they hope will be useful to them in the future. We are on Exmoor, we are not in an urban situation. People visit Exmoor expecting peace and tranquility with any rural noise being of a rural nature. If anything these hours should be reduced since they are only serving 1 mile of track.

Parracombe Parish Council –

The Cllrs of Parracombe Parish Council (PPC) discussed the proposal (at PPC meeting on 2/1/24) and resolved to object to the application as they were unable to understand why L&BR would want or need an extension to the hours of operation at this point in time, after many years of working successfully within the existing hours of operation. The Cllrs would be happy to look at the application again in the future, if further information can be provided regarding why the existing conditions need to be changed.

Lynton & Lynmouth Town Council –

No objection.

ENPA Assistant Woodlands Officer –

No observations

Environmental Health Officer –

I have reviewed this application in relation to Environmental Health matters on behalf of North Devon Council's Environmental Protection service. I have no objection to the proposed variation of Condition 2 of Permission 62/43/23/002.

North Devon District Council –

No Observations

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Representations

Exmoor National Park Authority has received six representations from members of the public in relation to this application. All representations have objected to the proposal. These are summarised below.

- Residents live in an Area of Outstanding Natural Beauty that should not be disturbed at 7am by the noise of a tourist attraction starting engines and doing maintenance work.
- Most people visiting Exmoor wish to enjoy peace and quiet and this would disrupt that.
- The value of neighbouring properties would be affected.
- The railway has been working well for 20 years so the need for the extension in hours is unclear.
- Fears raised that the approval of this present application would lead to further requests for extensions of the café hours or the running of trains outside the hours of 9-6.
- The proposal would be invasive and have a negative impact on the neighbouring community.
- The current permissions are adequate and do not need revision in relation to extended times.
- The peace and tranquillity of Exmoor must be protected.
- There is no valid reason for the extension of hours for maintenance.
- Given the short section of track the existing hours should be reduced and not extended.
- There would be an immediate negative impact on the area.
- Noise travels and people visit Exmoor expecting peace and tranquillity, not being woken up by railway associated noise at 7am.

Policy Context

Exmoor National Park Local Plan 2011 – 2031 (including minerals and waste policies)

GP1 – General Policy

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CE-D1 – Protecting Exmoor’s Landscapes and Seascapes
CE-S2 – Protecting Exmoor’s Dark Night Sky
CE-S6 – Design and Sustainable Construction Principles
CC-S1 – Climate Change Mitigation and Adaptation
CC-S5 – Low Carbon and Renewable Energy Development
RT-S1 – Recreation and Tourism
RT-D10 – Recreational Development
RT-S2 – Reinstatement of The Lynton and Barnstaple Railway

The National Planning Policy Framework (NPPF) is also a material planning consideration.

Planning Considerations

The existing condition (number 2) of planning permission 62/43/23/002 means that the use of the existing locomotive shed is restricted to the hours of 09.00 to 18.00 in line with the hours of operation of the Lynton and Barnstaple Railway. The applicant wishes to vary those hours to allow for the use of the shed only between 07.00 and 19.00. The operation of trains along the railway line itself would not be altered by the proposal.

It is noted that the railway is a popular visitor attraction, attracting additional visitors to Exmoor. It is further noted that the railway currently attracts visitor numbers in the region of 45,000 per year. Local planning policy acknowledges the importance of tourism to the economy of Exmoor and supports the reinstatement of the Lynton and Barnstaple Railway whilst also seeking to safeguard the flora, fauna, landscape and special character of the National Park through Policy RT-S2.

The main matters of this case, in terms of acceptability of the proposal, are considered to be functional need, impact upon the living conditions of neighbouring occupiers with particular regard to noise disturbance, and impact upon the landscape and ecology.

Functional need for the change in hours

It is noted that the previous applications for temporary planning permission relating to the rolling stock shed (62/43/03/003 & 62/43/13/001) did not impose conditions restricting the hours of operation on the aforementioned shed. As such, the terms of these previous temporary permissions meant that the shed was available for use 24 hours per day and 365 days per year.

The applicant has indicated that a restriction to the hours of operation for the rolling stock shed will mean that locomotive preparation, maintenance and inspection will have to take place during the operating hours of the railway. This would have a direct

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impact on train running and would result in a reduced timetable. A further email received from the applicant in response to the concerns raised by the parishes and local residents confirms that, as there was no restriction previously on the hours of use for the rolling stock shed, there will be no practical change in operation on site from the use of the shed prior to the imposition of condition 2 of planning permission 62/43/23/002 in September 2023. The applicant has further indicated that adherence to condition 2 restricting the hours of use for the rolling stock shed to 09.00 to 18.00 would mean that the railway be unable to run the current timetable, which would have a practical impact on visitor numbers and the running of the attraction. In addition, the applicant has confirmed that the use of the rolling stock shed between the hours of 07.00 and 19.00 will not impact on or alter the operational times of the railway, which will remain as 09.00 to 18.00 and which have been previously secured by condition on applications for the running of the railway.

Research undertaken by Officers indicates that the time needed to 'fire up' a steam locomotive safely from cold to running can take between 1 and 6 hours, with the average time needed to fire up a small narrow gauge locomotive being between 2 and 3 hours.

It is noted that the standard running timetable for the Lynton and Barnstaple Railway for 2024 (not including special events for which the timetable is not yet available) indicates that the first train of the day will leave Woody Bay Station at 10.45, with the last train departing at 16.00. From the details provided on the railway website, a round trip from Woody Bay Station to Killington Lane takes approximately 20 minutes. This gives an approximate arrival time for the final train on a standard running day of 16.20.

Given an average firing time of between two and three hours for a small narrow gauge locomotive, in order to meet the existing running times firing up of locomotives at the Lynton and Barnstaple Railway would need to commence between 7.45 and 8.45 in the morning, which is outside the operating hours allowed by condition 2 of 62/43/23/002.

It is noted that, as previously stated, there were previously no restrictions on operating hours for the rolling stock shed prior to the granting of 62/43/23/002 in September 2023. Given that the current timetable for standard running for 2024 matches that of previous years, going back to at least 2016, it can be demonstrated that the rolling stock shed has been used outside of the hours of 09.00 to 18.00 for some years.

It is therefore acknowledged that restricting the hours of use for the rolling stock shed to 09.00-18.00 in line with the operating hours of the railway, would directly impact upon the running timetable for the railway; with a start time of 09.00 meaning that the first train of the day would not be able to run until somewhere between 11.00 and 12.00. In addition, there would be a direct impact on maintenance and inspection times.

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As such, Officers consider that there is a functional need for the variation of Condition 2 of 62/43/23/002 to allow work to be undertaken within the rolling stock shed outside the times of 09.00 to 18.00 in order to allow the continued functioning of the railway and adherence to the existing timetable.

Impact upon neighbouring amenity

The concerns of local residents and Martinhoe Parish Meeting regarding the potential impacts on amenity through increased noise are acknowledged. Given that prior to September 2023, however, there was no restriction on the hours of operation for the rolling stock shed, and given that the timetable over the last seven years for which evidence has been obtained indicates that the rolling stock shed would have been in use prior to 09.00 on each running day, with locomotives being fired-up prior to operating on the railway line and locomotive maintenance taking place, and that no complaints have previously been received with regards to operating noises from the rolling stock shed, it is considered that the noise generated will not be of sufficient level as to represent an unacceptable loss of residential amenity through noise pollution. It is also noted that the Environmental Health Officer has raised no objection to the proposal on the grounds of noise pollution.

The concerns of Martinhoe Parish Meeting with regards to the effect of the variation of condition upon the Moorlands Hotel, which lies adjacent to Woody Bay Station and is the nearest neighbouring property to the application site, are noted. It is further noted, however, that no concerns have been raised by the owners of the property itself.

As such, Officers consider that the variation of Condition 2 of 62/43/23/002 to allow for the use of the rolling stock shed between the hours of 07.00 and 19.00 will not cause an undue or unacceptable erosion of residential amenity for neighbouring properties.

Impact upon the landscape

Policy CE-S1 seeks to conserve and enhance the “*high quality, diverse and distinct landscapes and seascapes of Exmoor National Park*” with development being informed by and complementing the distinctive characteristics of the landscape areas and character types as defined in the Exmoor National Park Landscape Character Assessment.

Similarly, Policy CE-D1 states that:

“1. Development will be permitted where it can be demonstrated that it is compatible with the conservation and enhancement of Exmoor’s landscapes and seascapes through ensuring that:

a) The visual impact of the development in its immediate and wider setting is minimised through high quality design that reflects local landscape character with particular regard to scale, siting, materials and colour; and

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b) *The cumulative and/or sequential landscape and visual effects of development do not detract from the natural beauty of the National Park and the experience of tranquillity.*

2. *Within Exmoor's Heritage Coast development should be appropriate to the coastal location and conserve the undeveloped nature of the coast consistent with Heritage Coast purposes.*

3. *Landscaping schemes should reinforce local landscape or seascape character and where these are required, conditions will be attached to protect important landscape characteristics and elements and whether appropriate replacement or additional landscape elements will be required.*

4. *Proposals which are significant in terms of scale and/or impact should provide a Landscape and Visual Impact Assessment as part of the application submission."*

It is noted that no changes affecting the landscape are proposed from the previously permitted developments.

As such, Officers consider that the proposal will not have an undue detrimental effect on the surroundings and is in line with planning policy and acceptable.

Ecology

Policy CE-S3 seeks to protect, conserve and enhance biodiversity within Exmoor National Park. In particular CE-S3 3(b) states that:

"Development likely to cause harm to legally protected species, or lead to the loss of or damage to their habitats, will not be permitted unless this can be mitigated or then offset so that local populations are at least maintained."

It is noted that the Wildlife Conservation Officer has chosen not to comment on the proposal. It is further noted that there will be no physical changes to the site. Officers therefore consider that in terms of ecology the proposal is in accordance with policy and is acceptable.

Other Matters

Climate Change

In May 2019 the UK government declared a climate emergency, Exmoor National Park followed this by declaring a Climate Emergency in October 2019. To help meet this challenge the Local plan includes policies which seek to influence, contribute and challenge development to help meet the Climate Emergency.

Policy GP1 of the Local Plan sets out that the need to consider future generations, through sustainability and resilience to climate change and adapting to and mitigating the impacts of climate change. Policy CC-S1 states that climate change mitigation will be encouraged, development which reduces demand for energy, using small scale

13.2

low carbon and renewable energy, looks to situate development which avoids sites that would put wildlife at risk together with measures which avoids the risk of flooding. Policy CC-S5 seeks to support small scale renewable energy schemes that assist in contributing towards reducing greenhouse gas emissions and moving towards a carbon neutral National Park and Policy CE-S6 seeks to incorporate sustainable construction methods which future proof against climate change impacts, including flood risk.

Paragraph 157 of the National Planning Policy Framework prescribes that the planning system should support the transition to a low carbon future in a changing climate taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

There would be a negligible impact on the climate resulting of this proposal.

Neighbour Concerns

It is noted that the concern regarding property prices is not a material planning consideration and so cannot be considered as part of this present recommendation report. Equally, the concerns raised with regards to the potential for further applications to increase the hours of train running or café opening hours are speculative at this stage. Planning recommendations must be for the proposed scheme only and cannot consider potential future applications, which would be determined on their own merit.

Human Rights

The provisions of the Human Rights Act 1998 and Equality Act 2010 have been taken into account in reaching the recommendation contained in this report.

Conclusion

The current proposal is considered to be acceptable. It is therefore considered that the application should be approved subject to the implementation of planning conditions.

Recommendation

Approve with conditions:

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason:

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In accordance with Section 91 of the Town and Country Planning Act 1990 (as amended).

2. The development hereby permitted shall not be carried out except in complete accordance with the submitted site plan, location plan and drawings numbered WB/501 Rev 0, WB/502A Rev 1 and WB/502B Rev 1 date stamped 01/12/2023 unless otherwise required by condition below.

Reason:

For the avoidance of doubt and to ensure the development accords with the approved plans.

3. The locomotive shed hereby permitted shall be used for the storing of locomotives and rolling stock used on the adjoining railway line, including related minor repairs and maintenance, and associated access in conjunction with the permitted railway use on this whole site. The use of the rolling stock shed shall not take place other than between the hours of 0700 and 1900 on any day.

Reason: To control the use of the locomotive shed to protect the amenities of this rural area.

4. The water tank hereby permitted shall be finished and thereafter maintained in external elevations of matt black, unless an alternative colour and finish is agreed in writing with the Local Planning Authority.

Reason: To protect the visual amenities of the area.

5. The miniature railway and storage building hereby approved shall only be used in conjunction with the miniature railway line included within the application site red outline and the movement on the track for the miniature railway within this site shall only operate between the hours of 0900 and 1800 on any day and consistent with those times approved for the main railway line at Woody Bay Station.

Reason: In order to reduce potential noise nuisance and disturbance to those residents in the vicinity of the storage shed and the associated railway.

6. No oil, fuel or chemical tanks shall be erected without the prior agreement in writing of the Local Planning Authority.

Reason: To prevent pollution of the water environment.

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7. There shall be no discharge of foul or contaminated drainage or trade effluent from the site into either groundwater or any surface water, whether direct or via soakaways.

Reason: To prevent pollution of the water environment.

Informatives

POSITIVE & PROACTIVE STATEMENT

This Authority has a pro-active approach to the delivery of development. Early preapplication engagement is always encouraged. In accordance with the requirements of Article 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015, in determining this application, Exmoor National Park Authority has endeavoured to work positively and proactively with the agent/applicant, in line with the National Planning Policy Framework, to ensure that all relevant planning considerations have been appropriately addressed to achieve a positive outcome.

MONITORING OF DEVELOPMENT

The applicant/developer is reminded that it is their responsibility to ensure that the requirements of each planning condition are met and that the works are undertaken in accordance with the approved plans. Any failure to meet the terms of a planning condition or work which does not accord with the approved plans leaves the applicant/developer liable to formal action being taken. The National Park Authority endeavours to monitor on site the compliance with conditions and building works. This has benefits for applicants and developers as well as the National Park. To assist with this monitoring of development the applicant/developer is requested to give at least fourteen days notice of the commencement of development to ensure that effective monitoring can be undertaken. The Planning Section can be contacted at Exmoor National Park Authority, Exmoor House, Dulverton, Somerset, TA22 9HL or by telephone on 01398 323665 or by email plan@exmoor-nationalpark.gov.uk.

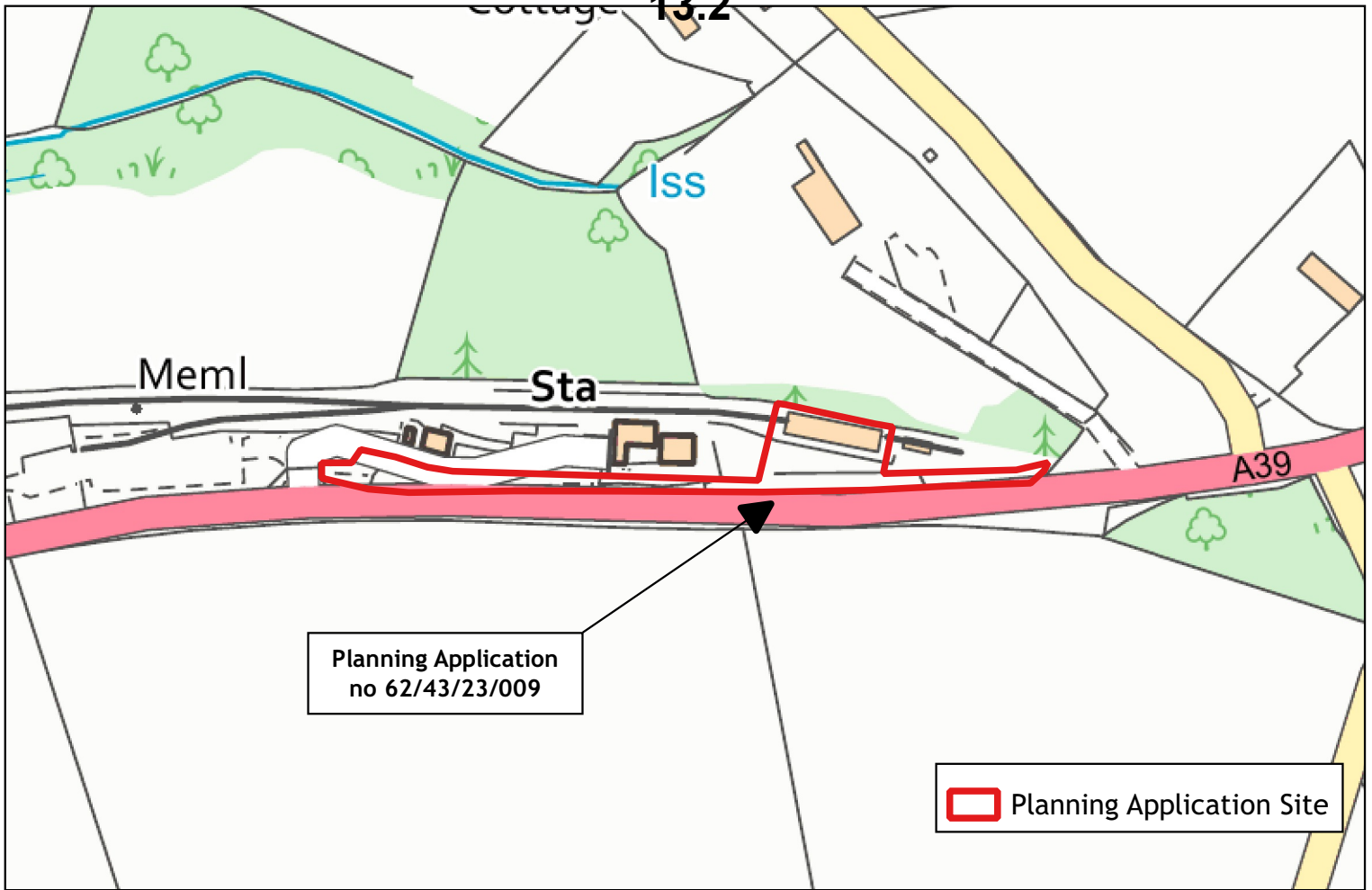
CONDITIONS AND INFORMATIVES AND THE SUBMISSION OF FURTHER DETAILS

Please check all the conditions and informatives attached to this Decision Notice. If there are any conditions which require submission of details and/or samples prior to work commencing on site it is vital that these are submitted and agreed in writing by the Local Planning Authority before work starts. Given the High Court's interpretation of the Planning Acts and their lawful implementation it is unlikely that the Local Planning Authority will be able to agree to a sample/details after the commencement

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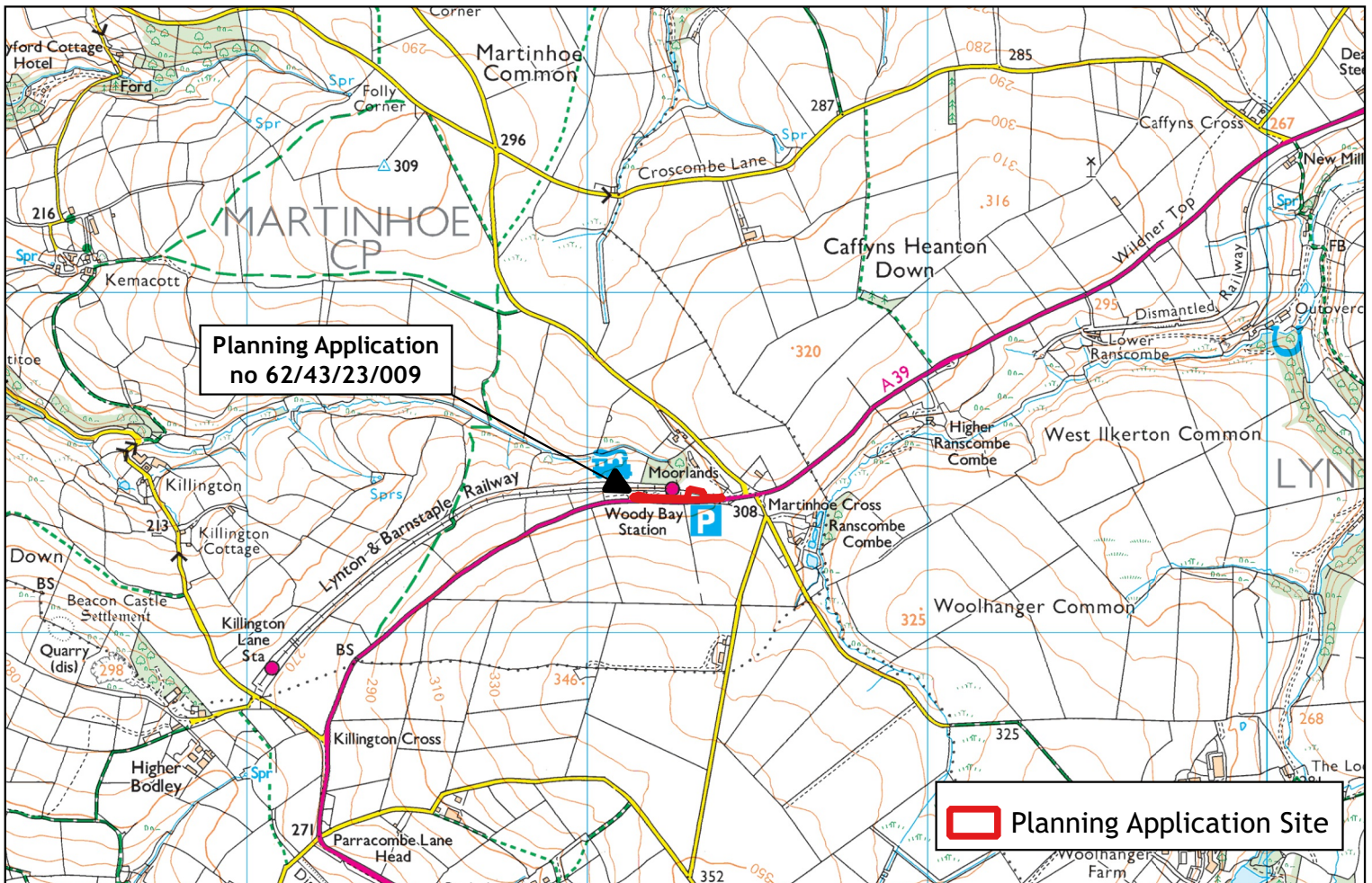
of works if that sample/details should have been approved prior to commencement. If a sample/detail is not agreed as required prior to commencement and works have started then it is likely that this matter may only be able to be rectified by the submission of another application. To avoid delay, inconvenience and the need to submit a further application, please ensure that all appropriate details/samples are submitted and agreed at the specified time.

Please also note that due to other decisions of the High Court it is now not normally possible for the Local Planning Authority to agree to minor amendments to approved applications. It will be necessary to adopt a formal approach and that if changes to approved plans are proposed then it will be necessary to make a new planning application. Please ensure that works comply with the approved plans so as to avoid the possibility that works are unauthorised and liable for enforcement action.



Site Map
Scale 1:2,500

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Overview Map
Scale 1:20,000

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Application decisions delegated to the Chief Executive

Application Ref	Applicant & Location	Decision and Date
62/62/24/002DC	Mr D Orton - Proposed Discharge of Condition 3 (Glazing) of approved application 62/62/22/004LB (Discharge of Condition) - TRENTISHOE COOMBE, TRENTISHOE, PARRACOMBE, BARNSTAPLE, EX31 4QB	20-Feb-2024 Approved
6/29/24/002DC	Mrs M Briggs - Proposed discharge of condition 3 (Fixings) of approved application 6/29/23/013LB (Discharge of Condition) - TITHE BARN COTTAGE, SELWORTHY, MINEHEAD, TA24 8TW	31-Jan-2024 Approved
WTCA 24/02	Mr Paul Sams - Works to trees in a conservation area: Crown reduction of 2no Damson trees by 30% and shape. (WTCA) - OLD TYTHE, WINSFORD, MINEHEAD, TA24 7JE	19-Feb-2024 Approved
6/9/23/022	Ms R Calvert-Smith - Proposed erection of porch extension. (Householder) - 27, AMORY ROAD, DULVERTON, TA22 9DY	15-Feb-2024 Approved with Conditions
GDO 23/13	The Home Office - Prior notification for Relocation of 3 no. Emergency Services Network antennas and MHAs to a new slimline antenna mount increasing the height of the structure to 17.4m, installation of 3 no. new Shared Rural Network antennas and 5 no. ground-based equipment together with the installation of remote radio units, mast head amplifiers, GPS nodes and associated apparatus and ancillary works. (GDO - Telecomms) - HALSE FARM, WINSFORD, MINEHEAD, TA24 7JL	02-Feb-2024 Prior Approval Not Reqd
62/11/23/013LB	Mr. P Gribbin, St Austell Brewery - Listed Building Consent for the proposed installation of defibrillator to East Elevation. (Listed Building Consent) - THE BLUE BALL INN, COUNTISBURY, LYNTON, EX35 6NE	05-Feb-2024 Approved with Conditions
6/43/23/015LB	Mr & Mrs N Popplewell - Listed building consent for the proposed erection of summerhouse (16ft x 10ft) (Listed Building Consent) - MANOR HOUSE, WOOTTON COURTENAY, MINEHEAD, TA24 8RD	05-Feb-2024 Listed Building Consent Not Required
6/43/23/014	Mr & Mrs N Popplewell - Proposed erection of summerhouse (16ft x 10ft) (Householder) - MANOR HOUSE, WOOTTON COURTENAY, MINEHEAD, TA24 8RD	07-Feb-2024 Approved with Conditions

Application decisions delegated to the Chief Executive

Application Ref	Applicant & Location	Decision and Date
6/19/23/004LB	Ms S Wilson - Listed building consent for the proposed erection of porch (1.2m x 3m) to south elevation. (Listed Building Consent) - BURROWHAYES FARM, WEST LUCCOMBE, MINEHEAD, TA24 8HT	05-Feb-2024 Approved with Conditions
62/41/23/032	Mr I Sefi - Proposed conversion of dwelling to self-catering holiday unit at ground floor with owners accommodation on first floor together with erection of first floor extension and external staircase (Full) - BAKERS COURT HOUSE, LEE ROAD, LYNTON, EX35 6BS	02-Feb-2024 Refused
6/29/23/013LB	Mrs M Briggs - Listed Building consent for the proposed Installation of secondary glazing. (Listed Building Consent) - TITHE BARN COTTAGE, SELWORTHY, MINEHEAD, TA24 8TW	25-Jan-2024 Approved with Conditions
6/9/23/021	Mr & Mrs Crisp - Proposed change of use of of B&B (use class C1) to residential dwelling (use class C3). (Full) - Town Mills, 1 High Street, Dulverton, Somerset, TA22 9HB	14-Feb-2024 Approved with Conditions
62/13/23/001	Mr G. Taylor, Shoulsbarrow Farmhouse - Proposed creation of dormer (retrospective). (Householder) - SHOULSBARROW FARM, CHALLACOMBE, BARNSTAPLE, EX31 4TS	05-Feb-2024 Refused
62/43/23/008	Mr H Rees - Proposed change of Use from a Hotel (Use Class C1) to Dwellinghouse (Use Class C3) (Full) - The Old Rectory, Martinhoe, Parracombe, Devon, EX31 4QT	31-Jan-2024 Approved with Conditions
6/26/23/011	Ms. T Patrick, Matric Developments (Roadwater) - Subdivision of 1no 4/5 bed house to 2no 1/2 bed flats together with the associated building works including alterations to the roadside fenestration. (Full) - OLD POST OFFICE, ROADWATER, WATCHET, TA23 0QY	02-Feb-2024 Approved with Conditions
6/14/22/104	Mr R Rowe - Proposed erection of Agricultural building (36.5m x 33.5m). Retrospective. (Full) - HORSEN FARM, SIMONSBATH, MINEHEAD, TA24 7LG	14-Feb-2024 Withdrawn