

# WRITTEN STATEMENT

Session 4:

SECTION 1 Introduction

SECTION 2 Vision, Objectives and Strategic Priorities

SECTION 3 General Policies

SECTION 10 Exmoor's Settlements

SECTION 11 Monitoring and Implementation; &

The Plan as a whole

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# 1 National Park purposes

## Question 4.1 Do section 1 and policy GP1 give adequate emphasis to the remoteness, wildness and tranquillity of the National Park? (RW)

- 1.1 Paragraph 1.2 of the Local Plan (SD1) provides the National Park context and references the two statutory purposes of the National Park and socio-economic duty, which form the starting point for the Local Plan. Further detail is given in paragraphs 3.3 to 3.4. Paragraph 3.5 and clause 2a) of GP1 refer to the 'Sandford Principle' whereby the first purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park would prevail in the event of an irreconcilable conflict between the two purposes, for example if the conservation and enhancement of the National Park was threatened by a recreation development proposal. Paragraph 1.28 explains that the General Policies are strategic policies and apply to all proposals within Exmoor National Park, in this way it is intended that GP1 Achieving National Park Purposes and Sustainable Development, will guide consideration of all development proposals.
- 1.2 Paragraph 1.24 explains the link between the Local Plan and the Exmoor National Park Partnership Plan, which sets out Exmoor's special qualities, including its remoteness, wildness and tranquillity. GP1 clause (1) defines sustainable development for Exmoor in the context of conserving and enhancing the National Park, its natural beauty, wildlife and cultural heritage and its special qualities. The special qualities of remoteness, wildness and tranquillity of the National Park would therefore be key considerations in development management decision-making.

## 2 Strategic Priorities

Question 4.2 Should the strategic priorities in section 2 include a presumption in favour of sustainable development, and provision of permanent and temporary housing for people working in the National Park? (BE)

- 2.1 The 'presumption in favour of sustainable development' is set out in the NPPF (para. 14) and therefore is a material consideration in planning decisions. There is no longer a requirement for Local Plans to include this presumption. Strategic Priorities 1 and 3 specifically refer to sustainable development in relation to Exmoor's local economy, communities and businesses, and details of how this will be achieved through the policy approach to guide development management decisions. Paragraphs 3.7 to 3.13 provide further explanation of sustainable development in relation to the NPPF, government policy and National Park purposes. This is reflected in GP1 which also provides a set of principles for how development proposals can contribute to the sustainable development of an area (GP1 Clause 3).
- 2.2 The provision of housing is focused on the delivery of local needs affordable housing, as evidenced in the Exmoor National Park Housing Topic Paper ([CE6](#)). The provision of housing for the specific needs of Exmoor's communities is included in strategic priority 2(i), which includes those who need to live near to their place of work (as set out in Policy HC-S3 Local Occupancy Criteria). Strategic priority 2(iii) encourages a balanced housing stock with a mix of sizes, types and tenures (HC-S2 A Balanced Housing Stock) which will benefit people working in the National Park. Strategic Priority 2(ii) also reflects the provisions in the Plan to enable the delivery of local needs affordable housing through cross-subsidy from some market housing (Principal Residence Housing – HC-S4) which may also help to meet the needs of employees within the National Park. Existing open market housing will also be available to employees.
- 2.3 Policy HC-D11 Residential Caravans allows for temporary housing in the form of residential caravans for rural workers where there is a proven essential need and the policy requirements are met. This is intended to provide temporary accommodation whilst a rural land based business is being established, after which it would be possible to apply for a rural workers dwelling as set out in HC-D9.

### 3 Principles for enhancement

#### Question 4.3 What is the purpose of paragraph 3.20, and what is its relationship to policy GP1?

- 3.1 Paragraphs 3.19 and 3.20 provide the key principles to achieve enhancement of the National Park, and accords with the first statutory purpose for National Parks.
- 3.2 This paragraph supports the requirement of policy GP1 (clause 1) to ensure that sustainable development will conserve and enhance the National Park. Therefore the principles listed in paragraph 3.20 provide an explanation in terms of how any enhancement should be achieved. In many cases this will be achieved through the support of other strategic policies relating to the quality of design and sensitivity to landscape and seascape character and visual amenity of the area.
- 3.3 A number of policies within the Plan are also intended to encourage specific enhancement opportunities, not just to mitigate the impact of new development, such as the redevelopment of existing sites and buildings within the National Park.
- 3.4 It is considered that paragraph 3.19 could be amended so the paragraphs, when read together, are clearer in their intention. The Authority is happy to propose an Additional Modification (AM) to the Inspector in this regard. These further modifications are set out in Table 3.1 below (changes shown in red).

Table 3.1

Ref	Additional Modification (AM)
AM4.1	<p>3.19 <del>The p</del> Paragraph <u>3.20</u> below sets out four principles to underpin opportunities for the enhancement of the National Park and reflecting the first statutory purpose. It takes forward objectives <u>1, 2, and 5, and will be achieved through strategic policy requirements</u> in the Plan. <u>including to:</u></p> <ul style="list-style-type: none"> <li><del>a) ensure that Exmoor's moorlands remain open, remote and relatively wild in character; that views are preserved;</del></li> <li><del>b) conserve and enhance Exmoor's landscapes as living working landscapes that remain predominately free from intrusive developments;</del></li> <li><del>c) ensure that the built tradition, character, distinctiveness and historic character of Exmoor's settlements, buildings, farmsteads, landscapes, archaeological sites and monuments is conserved and enhanced and that the cultural heritage of Exmoor is protected through the careful management of development.</del></li> </ul>

Ref	Additional Modification (AM)
	<p>3.20 Principles for the enhancement of the National Park:</p> <ul style="list-style-type: none"> <li>a) opportunities for enhancing the special qualities and valued features of the National Park should be identified and responded to.</li> <li>b) proposals to enhance the National Park should demonstrate a significant overall benefit to the natural beauty, wildlife and cultural heritage, including the historic environment, of the area and should not undermine the achievement of other Plan Policies.</li> <li>c) opportunities should be taken to enhance the National Park by the treatment or removal of intrusive structures or features in a way which conserves the special qualities or valued features of the site and its surroundings.</li> <li>d) opportunities which arise for the enhancement of natural resources, land (including contaminated land and the removal of pollutants) and access/transport should be taken.</li> </ul>

## 4 Major Development

Question 4.4 Is the policy approach to major development set out in policy GP2, supported by paragraphs 3.23-3.27, justified and consistent with national policy? (BE, NT)?

- 4.1 The NPPF does not define 'major development' in the context of National Parks (paragraph 116). The supporting text is based on evidence arising from case history and outlined in Maurici, J. (2014) Majors Opinion 2 - in the matter of the National Planning Policy Framework and in the matter of the South Downs National Park Authority [[EB20](#)], which provides that planning permission should be refused for major development in National Parks except in exceptional circumstances and where it can be demonstrated to be in the public interest. Whether a proposed development should be treated as a major development will be a matter for the relevant decision taker, taking into account the proposal in question and all its circumstances, and the local context. The NPPF is clear that great weight should be given to conserving landscape and scenic beauty in these designated areas irrespective of whether the policy in paragraph 116 is applicable.
- 4.2 The objection by the National Trust (NT) related to the question of soundness (not effective) of policy GP2 and supporting text.
- 4.3 The Authority proposed a change to the supporting text in paragraph 3.26 of the Plan [[SD5](#): ref 44, page 13] to provide clarification to major development in a 'local context' and 'the potential impacts on the National Park'. This is a matter of agreement between the Authority and the National Trust as set out in HD1 Statement of Common Ground between Exmoor National Park Authority and the National Trust.

## 5 Settlement Strategy

### Question 4.5: Is there justification for the allocation of settlements to the categories in Table 3.1? (CE, RW)

- 5.1 The evidence to support the spatial strategy and the categorisation of the settlements within the strategy is included within [CE14](#) Spatial Strategy Local Plan Topic Paper. A thorough analysis of all the settlements identified in the settlement hierarchy within the adopted Local Plan 2001-2011, and additional smaller communities with some service provision, has been undertaken in terms of their population, service provision, and constraints to development. The settlement selection was scrutinised through the SA/SEA process and Habitat Regulations Assessment.
- 5.2 The spatial strategy includes Local Service Centres which are identified as the largest centres in the National Park and provide a wide range of services to the settlements and the surrounding hinterland – because of their specific service role these settlements have been identified separately from villages which have slightly fewer services. However, the policy approach in policy GP3 Spatial Strategy is exactly the same. Paragraph 3.39 explains that development should be of a scale that does not harm their form, setting or character – consistent with clause 2 of GP3 spatial Strategy. Paragraph 3.39 also reinforces the fact that the Local Service Centres are not any larger than many villages elsewhere in Devon and Somerset and it is their relative isolation, the extent of the area they serve and the influence of tourism which sustains the level of services in these settlements. The term ‘Local Service Centres’ is considered to reflect the role of Dulverton, Lynton & Lynmouth and Porlock in the National Park context.
- 5.3 The evidence [\[CE14\]](#) also demonstrates that Withycombe, like many other small communities on Exmoor has relatively few services or facilities, and in addition to this only a very small proportion of the settlement lies within the National Park boundary. The remainder of the settlement lies within West Somerset local planning authority area and is not recognised as an identified settlement within their Submission Draft Local Plan. However, clause 3.d) of policy GP3 Spatial Strategy does provide opportunities for self build local affordable housing in sustainable locations and references policy HC-D5 (Custom/Self Build Housing in Rural Communities) accordingly – this policy enables the provision of self build affordable homes within rural communities that have at least one service (a shop, pub or community meeting place). A number of communities listed in paragraph 6.132 of the Plan [\[SD1\]](#), including Withycombe, would meet these criteria.

- 5.4 The category of 'Rural Communities' was included within the Draft Local Plan (November 2013), but removed from the Publication Draft Local Plan [[SD1](#)] following the introduction of S106 thresholds for affordable housing to Planning Practice Guidance (PPG) through the Written Ministerial Statement dated 28 November 2014. However, the policy approach in the Publication Draft Local Plan still provides for the same type of development within these smaller communities without the need to include them within Table 3.1 and policy GP3 Spatial Strategy.
- 5.5 Therefore, it is considered that the allocation of settlements into the three categories is justified.

Question 4.6: Should any other settlements be added to Table 3.1? (CE)

- 5.6 Based on the statement provided under question 4.5, it is considered that no further settlements should be added to Table 3.1.

## 6 Development in the Open Countryside

### Question 4.7: Should paragraph 3.44 have policy status, and should it also include self-build housing? (CE)

- 6.1 Similar text to paragraph 3.44 was formerly included within the Spatial Strategy policy in the Draft Local Plan (November 2013). This section was removed from the policy to reduce the length and complexity of the policies, an issue raised through consultation responses on the Draft Local Plan. The paragraph is simply meant to be an informative regarding the types of development that may be considered in the Open Countryside, which are set out within Policy GP3 and other policies in the Publication Draft Local Plan. Clause 3.d) [clause 4 in [SD5](#) Schedule of Proposed Changes, ref 56, page 17-19] of policy GP3 provides the policy approach to new build development within the Open Countryside.
- 6.2 The Authority accepts that 3.44 a) should include reference to policy HC-D5 (Custom/Self Build Housing in Rural Communities) and the introductory text should be amended to be read as an informative rather than a policy requirement. The Authority is happy to propose an Additional Modification (AM) to the Inspector in this regard. These further modifications are set out in Table 3.2 below (changes shown in red).

Table 3.2

Ref	Additional Modification (AM)
AM4.2	<p>3.44 <del>D</del> <u>The type of d</u> development considered to be acceptable in the open countryside <del>should be in accordance with</del> <u>is set out in policy GP3 (in terms of new build development) and</u> other policies in this plan and <del>specifically</del> includes development that:</p> <p>a) is essential for the operation of rural land-based enterprises (HC-D8 New Build Dwellings in the Open Countryside, HC-D9 Rural Workers, HC-D10 Succession Farming – Second Dwellings on Established Farms, SE-S4 Agricultural and Forestry Development);</p> <p>b) relates to recreation and tourism development that promotes the understanding and enjoyment of Exmoor;</p> <p>c) <u>provides for local affordable self-build homes in a rural communities (HC-D5);</u></p> <p>d) <del>e</del> involves the conversion and change of use of existing buildings for local affordable homes, extended family dwellings, business uses, visitor accommodation, and residential institutions;</p> <p>e) <del>e</del> forms an extension to existing dwellings or business premises;</p> <p>f) <del>e</del> replaces or subdivides an existing dwelling;</p>

Ref	Additional Modification (AM)
	<ul style="list-style-type: none"><li data-bbox="454 241 1220 309">g) <del>f</del> is regarded as householder development - including opportunities for home-based businesses;</li><li data-bbox="454 324 1284 392">h) <del>g</del> relates to essential utilities infrastructure and renewable energy requirements; or</li><li data-bbox="454 407 1252 443">i) <del>h</del> facilitates the small-scale extraction of building stone.</li></ul>

## 7 Spatial Strategy

### Question 4.8: Should policy GP3 specifically express support for the growth of businesses, and should the words “rural land-based” be deleted from policy GP3, clause 3(d)? (BE)

- 7.1 Policy SE-S1 A Sustainable Economy is the over-arching strategic policy within Section 7 and specifically encourages business and employment development which strengthens, enhances and diversifies the Exmoor economy. It is considered that this policy supports business growth on Exmoor providing there will be no unacceptable adverse impacts on the National Park.
- 7.2 Clause 3.d) of policy GP3 Spatial Strategy [clause 4 in [SD5](#) Schedule of Proposed Changes, ref 56, page 17-19] reflects the circumstances where new build development is considered to be acceptable in relation to the operation of rural land-based businesses, new rural worker dwellings, succession farm dwellings, or self-build affordable homes in small rural communities that have at least one service (a shop, pub or community meeting place). This is consistent with policies within 'Section 7 Achieving a Sustainable Economy' which provide further detail regarding new business development including within the open countryside.
- 7.3 New build business development is considered to be more suitable in sustainable locations identified in the spatial strategy as Local Service Centres, Villages and Porlock Weir, where the scale of development is consistent with the settlement size. However, in the Open Countryside the Plan supports the growth of businesses through extensions to existing business premises (Policy SE-S3) and flexibility for new business space within the curtilage of dwellings to meet the needs of home-based businesses (Policy SE-D2) – which reflects the fact that 37% of people aged 16 or over in employment within the National Park, work at or from home.<sup>1</sup>
- 7.4 The Authority considers that clause 3.d) of policy GP3 Spatial Strategy does not require alteration in respect of the deletion of “rural land-based”, and given the positive support for business development in SE-S1 this does not necessarily need to be repeated in GP3 given that the Plan should be read as a whole. However, the Authority accepts that SE-D2 does refer to the opportunity for new build home-based business premises including in the Open Countryside and proposes a Main Modification (MM) to clause 3.d) in Policy GP3 [[SD5](#): ref 56, page 17-19] to the Inspector to make the Policy fully effective in this regard. These further modifications are set out in Table 3.3 below (changes shown in red).

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<sup>1</sup> ONS (2015) Table CT0418 Origin Destination Workplace – Method of travel to work (2001 specification) by distance travelled to work – published online at [www.ons.gov.uk](http://www.ons.gov.uk)

Table 3.3

REF	Main Modification (MM)
<b>MM4.1</b> Change to GP3 (incorporating proposed change in <a href="#">SD5</a> : ref 56, page 17-19)	<b>4.-d)</b> Outside the named settlements the area is identified as the Open Countryside where the focus of new build development will be on improving the sustainability of rural land-based businesses ( <del>HC-D7, HC-D8, HC-D9 and SE-S4</del> ), <b>providing opportunities for home-based businesses (SE-D2)</b> and enabling self-build opportunities for local affordable housing in sustainable locations ( <del>HC-D5, HC-D8, HC-D9, HC-D10 and SE-S4</del> ).

## 8 Efficient Use of Land and Buildings

### Question 4.9: As currently worded, is policy GP4, clause 1 effective?

- 8.1 The Authority recognises that this particular issue was raised in [EX2](#) Inspector's Initial Assessment Letter with Queries within the list of points on which the meaning of the Plan's policies may require clarification.
- 8.2 The Authority accepts that the meaning of clause 1 of Policy GP4 requires clarification and proposes a Main Modification (MM) to the Inspector to make the Policy fully effective in this regard. These further modifications are set out in Table 3.4 below (changes shown in red).

Table 3.4

REF	Main Modification (MM)
MM4.2 Change to GP4	<p>1. Development proposals <b>will be encouraged which-should demonstrate the efficient use of land and buildings including through:</b></p> <p>a) <b>the redevelopment of</b> brownfield land located within the built extent of the named settlements that does not have a high ecological value; <b>or</b></p> <p>b) <b>the re-use of existing buildings within the built extent of the named settlements, or within or well-related to hamlets and farmsteads.</b></p>

## 9 Securing Planning Benefits

Question 4.10: Will policy GP5 be effective in securing necessary infrastructure provision without compromising the viability of development? (CE, HBF)

- 9.1 The Infrastructure Delivery Plan (EB25) does not identify any particular infrastructure needs to be funded over the Plan period. However, the policy provides the flexibility to review the need for CIL subject to changing circumstances. The main financial contributions from development will be required for affordable housing where in exceptional circumstances, it cannot be feasibly provided on site. Further guidance in relation to these contributions will be provided in a forthcoming Housing supplementary planning document (SPD).

## 10 Lynton and Lynmouth Neighbourhood Plan

### Question 4.11: Are the provisions of policy ES-S2 consistent with relevant legislation and national policy? (HBF)

10.1 Policy ES-S2 ensures that development proposals are determined in accordance with the neighbourhood plan and the strategic policies of the Local Plan. As a result of the consultation response from HBF, the Authority has proposed changes to the supporting text and Policy ES-S2 which are included within [SD5 Schedule of Proposed Changes](#) [refs 431 and 432, pages 189-190]. These changes provide further clarification to ensure that strategic policies of the Local Plan have precedence in the determination of planning proposals within the neighbourhood plan area.

## 11 Historic Settlement Core

### Question 4.12: Does the Plan make it sufficiently clear what are the policy implications of the “historic settlement core” shown on each of the settlement inset maps?

11.1 The supporting text to policy CE-S4 Cultural Heritage and Historic Environment references the ‘historic settlement core’ within paragraph 4.100 of the Plan [[SD1](#)] in terms of where an application affects or has the potential to affect heritage assets with an archaeological interest. A definition of the historic settlement core is provided in footnote 114. The Authority has proposed to include a definition of the term Historic Settlement Core in the Glossary [[SD5](#): ref 455, page 197] for clarification.

11.2 The following methodology was used by ENPA Conservation Officers for the Historic Environments to redraw the historic settlement cores:

- Tithe Maps (1838-1840) – include the buildings and the rear boundaries of associated plots within the settlement core areas. This includes farmsteads (with immediate paddocks but not entire fields) etc. which are on the edge of the main settlement areas.
- 1st Edition– include buildings and gardens only.
- 2nd Edition Ordnance Survey Maps - not in use.

### 4.13 Is the “historic settlement core” for Dulverton defined appropriately? (RW)

11.3 The Iron Age hillfort, Oldberry Castle, is a designated Scheduled Monument which lies to the east of Dulverton above and partially within Burr ridge Wood.

11.4 The Authority considers that the Oldberry Castle is not part of the historic settlement core of the settlement as the location of the hillfort would not meet the requirements set out in the methodology – particularly as it is not within or adjoining the settlement core areas, and it is only partially included on [Inset Map 7](#) for Dulverton.

11.5 The Map of Oldberry Castle and Dulverton (Appendix 1) shows the relative distance between the historic settlement core of Dulverton and this Scheduled Monument. The Authority considers that the historic settlement core for Dulverton has been defined appropriately in accordance with the methodology used (see para. 11.2 above).

## 12 Duty to Co-operate

Question 4.14 Has the duty to co-operate in preparing the Plan been met?

12.1 The Authority has complied with the duty to co-operate, as set out in [SD10](#) ENPA Duty to Co-operate Statement.

## 13 Monitoring and Implementation

### Question 4.15 Are the provisions for monitoring and implementing the Plan appropriate and effective?

- 13.1 The provisions for monitoring and implementation of the Plan are set out in [SD1](#) section 11. The monitoring framework identifies the indicators that will be used to monitor the effective implementation of each policy, including some existing indicators (which will provide trend information), and also some new or changed indicators to ensure that all the policies are covered appropriately. The monitoring framework also identifies links to the Plan objectives and to the relevant sustainability appraisal objectives, to demonstrate how the Plan's contribution to sustainable development will be monitored.
- 13.2 The Authority produces an Annual Monitoring Report ([CE18](#)) which details the progress that has been made in implementing the Plan and will also identify whether adjustments need to be made to particular policies or if there needs to be a review of the Plan. The AMR also reports any activity relating to the duty to co-operate.

## 14 Small Scale Development and Referencing

### Question 4.16 Should the Plan as a whole contain fewer references to “small-scale” development, and fewer cross-references? (BE, CE)

- 14.1 The words ‘small-scale’ are used in various sections of the Plan to ensure that development does not have unacceptable adverse impacts on the natural beauty, wildlife and cultural heritage of the National Park and generally represents the scale of existing development within the sparsely populated rural context of Exmoor. The term is used in both the local and wider context to ensure that certain developments do not harm the landscape character or visual amenity of the area, whilst ensuring that policies are flexible to enable local communities and businesses to thrive.
- 14.2 A review of the use of the term ‘small-scale’ was undertaken following the objection raised by Business Exmoor. On balance it was considered that the use of the term was justified in its use either as a factual, descriptive statement or as a policy requirement where it is important to define a scale that is acceptable and appropriate to the area or local needs (e.g. policies CE-S7 Small-Scale Working or Re-Working for Building and Roofing Stone, and CC-D3 Small Scale Wind Turbines). The term often references an established and continued policy approach consistent with National Park purposes.
- 14.3 Small-scale in relation to the development of buildings is a scale that meets a local need and should be of a scale or size that is appropriate to the character of: its setting; the surrounding National Park landscape or seascape character; and the size of the building group it is associated with (whether that is a farmstead, hamlet or named settlement). The scale of a proposal will be a matter of planning judgement and will be considered against policies in the Local Plan including GP1, CE-S1, CE-D1 and CE-S6.
- 14.4 One iteration of ‘small-scale’ is proposed to be deleted [[SD5](#): ref 147, page 65].

## 15 Plan Review

### Question 4.17 Should the Plan make explicit provision for a review? (RW)

15.1 [SD1](#) section 11 sets out how implementation of the Plan will be monitored. The Authority produces an Annual Monitoring Report ([CE18](#)) which details the progress that has been made in implementing the Plan and will also identify whether adjustments need to be made to particular policies or if there needs to be a review of the Plan. In addition, and in accordance with Planning Practice Guidance (Paragraph: 008 Reference ID: 12-008-20140306), the Authority will consider on a five yearly basis whether the Local Plan requires updating in whole or in part.

15.2 SECTION 1 Introduction; SECTION 2 Vision, Objectives and Strategic Priorities; SECTION 3 General Policies; SECTION 10 Exmoor's Settlements; SECTION 11 Monitoring and Implementation; & The Plan as a whole

Question 4.18 Are the policies in these sections of the Plan sound in all other respects, are they effectively drafted to achieve their intended purpose, and do they provide a clear indication of how a decision-maker should react to a development proposal?

15.3 The Authority is satisfied that, with the proposed changes in the Schedule (SD5) and subject to further changes identified in the written statements for soundness, the Plan is sound in all other respects and provides a clear indication of how decisions will be made in response to development proposals.

# 16 Appendix 1: Map of Dulverton and Oldberry Castle

