

Exmoor National Park Local Plan 5-Year Review PAS Local Plan Review Assessment¹

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A	PLAN REVIEW FACTORS		
A1.	<p>The plan policies still reflect current national planning policy requirements.</p> <p>PROMPT: As set out above in the introductory text, in providing your answer to this statement consider if the policies in your plan still meet the ‘content’ requirements of the current NPPF, PPG, Written Ministerial Statements and the National Model Design Code (completing Part 2 of the toolkit will help you determine the extent to which the policies in your plan accord with relevant key requirements in national policy).</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence):</p> <p>While there have been changes to national policy, including in the NPPF, since the Local Plan was adopted, a detailed analysis of national policy changes in the NPPF, as well as Planning Practice Guidance against Exmoor National Park Local Plan policies (using the <i>PAS Local Plan Routemapper Toolkit Part 2 (Local Plan Review - Local Plan Form and Content Checklist)</i>, has indicated that the plan policies still reflect current national planning policy requirements.² The Model Design Code and National Design Guide will be taken account of as part of the forthcoming review of the Exmoor National Park Design Guide. The analysis of national policy changes is not considered to indicate the need for a review of Exmoor National Park Local Plan policies.</p>

¹ Based on the PAS Local Plan Route Mapper Toolkit Part 1:

² [Exmoor - Exmoor National Park Local Plan 5-Year Review \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk)

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A2.	<p>There has not been a significant change in local housing need numbers from that specified in your plan (accepting there will be some degree of flux).</p> <p>PROMPT: Look at whether your local housing need figure, using the standard methodology as a starting point, has gone up significantly (with the measure of significance based on a comparison with the housing requirement set out in your adopted local plan).</p> <p>Consider whether your local housing need figure has gone down significantly (with the measure of significance based on a comparison with the housing requirement set out in your adopted local plan). You will need to consider if there is robust evidence to demonstrate that your current housing requirement is deliverable in terms of market capacity or if it supports, for example, growth strategies such as Housing Deals, new strategic infrastructure investment or formal agreements to meet unmet need from neighbouring authority areas.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The standard methodology does not apply in National Parks. A review of the Local Plan Indicative Affordable Housing Need figure through a Local Housing Needs Assessment, carried out in 2021, has shown a small reduction in the need for new housing 2011- 2031 from 238 to 194 units (a change from an average of c. 12 p.a. to c. 10 p.a.).³</p> <p>The local housing needs assessment report says: <i>...the indicative affordable housing need figure arising in the (then) West Somerset part of Exmoor NP ... amounts to 238 dwellings over 20 years, or 12 per annum. The North Devon element of the figure is included in the North Devon & Torridge Local Plan housing requirement.</i></p> <p><i>Policy M1-S1 'Monitoring and Review of Affordable Housing Need and Provision' of the adopted Exmoor National Park Local Plan requires the National Park Authority to complete a review of the indicative affordable housing need figure for the Plan period set out in paragraph 6.32 of the Plan (238 affordable dwellings), on the basis of the latest available evidence. An increase of more than 20% in the Plan's indicative affordable housing need figure of 238 dwellings 2011-31 would trigger a full or partial review of the Plan. In this current study, we have reviewed the latest available evidence for housing needs for Exmoor NP within Somerset West & Taunton.</i></p> <p>Using more localised evidence than was set out in the Local Plan evidence base, we have found a small decrease in the figure and that</p>

³ [Local Housing Needs Assessment](#)

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			<p>the affordable housing need for the area 2011-31 is 194 dwellings or nearly 10 affordable housing units per annum. Therefore, the evidence provided in this current study is extremely consistent with, and slightly lower than, the indicative affordable housing need figure in the adopted Local Plan.</p> <p>There has not been a significant change in local housing need numbers from that specified in the adopted Local Plan. The analysis of the local housing need figure is not considered to indicate the need for a review of Exmoor National Park Local Plan policies.</p>
A3.	<p>You have a 5-year supply of housing land</p> <p>PROMPT: Review your 5-year housing land supply in accordance with national guidance including planning practice guidance and the Housing Delivery Test measurement rule book</p>	N/A	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The Housing Delivery Test does not apply to National Park Authorities⁴ The adopted Local Plan housing strategy (HC-S1 – Housing and associated policies) seeks to deliver housing needed by local communities, prioritising local need affordable housing through a rural exceptions approach without a housing target or allocations. The Local Plan Indicative figure for affordable housing has been reviewed (see above) and delivery is monitored through Authority Monitoring Reports and evidence is summarised in the Local Plan 5-Year Review Summary Report and Housing and Community Topic Paper.⁵</p>

⁴ [Housing Delivery Test measurement rule book \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/108122/housing-delivery-test-measurement-rule-book.pdf)

⁵ Exmoor National Park Authority Monitoring Report 2019-21 Interim Summary, ENP Local Plan 5-Year Review Summary Report and Housing and Community Topic Paper May 2022.

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A4.	<p>You are meeting housing delivery targets</p> <p>PROMPT: Use the results of your most recent Housing Delivery Test, and if possible, try and forecast the outcome of future Housing Delivery Test findings. Consider whether these have/are likely to trigger the requirement for the development of an action plan or trigger the presumption in favour of sustainable development. Consider the reasons for this and whether you need to review the site allocations that your plan is reliant upon. In doing so you need to make a judgement as to whether updating your local plan will support delivery or whether there are other actions needed which are not dependent on changes to the local plan.</p>	N/A	<p>The Housing Delivery Test does not apply to National Park Authorities⁶.</p> <p>The adopted Local Plan housing strategy seeks to deliver housing needed by local communities, prioritising local need affordable housing through a rural exceptions approach using an indicative affordable housing need figure and without a housing target or allocations.</p> <p>Policy M1-S1 'Monitoring and Review of Affordable Housing Need and Provision' of the adopted Local Plan requires a review of the indicative affordable housing need figure for the Plan period (238 affordable dwellings), on the basis of the latest available evidence. An increase of more than 20% in the Plan's indicative affordable housing need figure of 238 dwellings 2011-31 would trigger a full or partial review of the Plan. The 2021 local housing need assessment study reviewed the latest available evidence for housing needs for Exmoor National Park. This found a small decrease in the figure and that the affordable housing need for the area 2011-31 is 194 dwellings or nearly 10 affordable housing units per annum. Therefore, the updated evidence was extremely consistent with, and slightly lower than, the indicative affordable housing need figure in the adopted Local Plan.</p> <p>Affordable housing delivery has been monitored.⁷ Affordable housing delivery has been lower than hoped, however it is considered this is not due to plan policies but other factors.</p>

⁶ [Housing Delivery Test measurement rule book \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

⁷ Exmoor National Park Authority Monitoring Report 2019-21 Interim Summary, Local Plan 5-year Review Summary Report and Housing and Community Topic Paper May 2022 [Exmoor - Exmoor National Park Local Plan 5-Year Review \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk)

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			Further work is being considered to help support the delivery of local need affordable housing e.g., further guidance.
A5.	<p>Your plan policies are on track to deliver other plan objectives including any (i) affordable housing targets including requirements for First Homes; and (ii) commercial floorspace/jobs targets over the remaining plan period.</p> <p>PROMPT: Use (or update) your Authority Monitoring Report to assess delivery.</p>	No Plan targets. In the context of the Adopted LP, Agree	<p>Updated evidence required by Policy M1-S1 indicates that the affordable housing need for the area 2011-31 is 194 dwellings or nearly 10 affordable housing units per annum.</p> <p>The adopted Local Plan housing strategy seeks to deliver housing needed by local communities, prioritising local need affordable housing through a rural exceptions approach using an indicative affordable housing need figure - without a housing target or allocations.</p> <p>Affordable housing delivery has been monitored.⁸ Although affordable housing delivery has been lower than hoped, it is considered this is due to a number of (non-policy) factors rather than plan policies. Homes England affordable housing grants have been reinstated within the last 18 months for both housing authority areas in the National Park which provides the potential to enable affordable housing schemes to come forward through Registered Providers.</p> <p>Analysis of the Authority Monitoring Report and other evidence do not indicate the need for a review of Exmoor National Park Local Plan</p>

⁸ Exmoor National Park Authority Monitoring Report 2019-21 Interim Summary, Local Plan 5-year Review Summary Report and Housing and Community Topic Paper May 2022 [Exmoor - Exmoor National Park Local Plan 5-Year Review \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk)

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			policies although officers consider that other (non-policy) work is needed e.g., continued partnership working and planning guidance to support the delivery of local need affordable housing.
A6.	<p>There have been no significant changes in economic conditions which could challenge the delivery of the Plan, including the policy requirements within it.</p> <p>PROMPT: A key employer has shut down or relocated out of the area.</p> <p>Unforeseen events (for example the Covid-19 Pandemic) are impacting upon the delivery of the plan.</p> <p>Up-to-date evidence suggests that jobs growth is likely to be significantly more or less than is currently being planned for.</p> <p>Consider if there is any evidence suggesting that large employment allocations will no longer be required or are no longer likely to be delivered.</p> <p>You will need to consider whether such events impact on assumptions in your adopted local plan which have led to a higher housing requirement than your local housing need assessment indicates.</p> <p>Consider what the consequences could be for your local plan objectives such as the balance of in and out commuting and the resultant impact on</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>Changes since the adoption of the Local Plan have been considered. Analysis has included of stakeholder consultation responses on changes to farm-based businesses and the impact of the Covid-19 Pandemic on, in particular, the tourism sector, changes to working patterns and increases in house prices following the Covid-19 Pandemic as well as evidence on Covid Recovery for Exmoor. These are summarised in a Stakeholder Workshop Summary, Survey Responses Schedule, 5-Year Review Summary Report and three Topic Papers including on Housing and Community and the Economy.⁹</p> <p>It is recognised that this is a challenging time for land-based businesses as a result of a range of changes including to farm subsidies and for tourism businesses which have seen significant effects as a result of the Covid-19 Pandemic.</p> <p>Consequently there will have been changes as a result of unforeseen events (the Covid-19 Pandemic) which may have led to delays e.g., in progressing affordable housing although it is difficult to quantify and</p>

⁹ [Exmoor - Exmoor National Park Local Plan 5-Year Review \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk/exmoor-national-park-local-plan-5-year-review)

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	proposed transport infrastructure provision (both capacity and viability), air quality or climate change considerations.		<p>assess the degree to which the pandemic has affected delivery. Delays are not considered to be related to plan policies.</p> <p>Officers are not aware of other specific examples provided –</p> <ul style="list-style-type: none"> - <i>E.g. a key employer has shut down or relocated out of the area</i> Through Duty to Co-operate, consideration is being given to the potential for new employment sites in nearby towns. - <i>Up-to-date evidence suggests that jobs growth is likely to be significantly more or less than is currently being planned for.</i> Evidence including on Covid Recovery has been assessed and stakeholder consultations taken account of¹⁰ One area highlighted through consultation has been the effect on the housing market of people moving to the area linked, potentially, to more flexible and home-based working (SE-D1) which could see working age people and families able to move/ stay on Exmoor. This is also linked to good digital connectivity. It is considered to be too early to predict the changes, long-term effects & future response to changes including in land-based businesses and tourism that may be necessary. - <i>Evidence that large employment allocations will no longer be required or are no longer likely to be delivered:</i> The Local Plan does not contain employment allocations. Instead, the plan contains criteria-based employment policies (SE-S1-SE-S3) which enable a flexible approach to respond to future changes and enable development to come forward as needed.

¹⁰ Exmoor National Park Local Plan Summary Report, Economy Topic Paper May 2022, 5 Year Review Stakeholder Workshop Summary December 2021 and Exmoor National Park Local Plan 5 Year Review Survey Responses Schedule [Exmoor - Exmoor National Park Local Plan 5-Year Review \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk)

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			<ul style="list-style-type: none"> - <i>Whether such events impact on assumptions in your adopted local plan which have led to a higher housing requirement than your local housing need assessment indicates: the Local Plan does not contain a housing target, instead it has an indicative figure for affordable housing need to be delivered through a rural exceptions approach without site allocations. This needs-led approach enables local need affordable housing to come forward flexibly where it is needed. The Plan also provides for other local needed housing – rural worker, succession farm, extended family and accessible and adaptable housing.</i> - <i>Consider what the consequences could be for your local plan objectives such as the balance of in and out commuting and the resultant impact on proposed transport infrastructure provision (both capacity and viability), air quality or climate change considerations.</i> <p>These factors are potentially linked – home working could reduce commuting, fuel use and lead to younger working age people able to move to/stay on Exmoor but could push up the demand for existing housing and lead to increases in house price and thereby the need for affordable housing for local communities. Currently, it is difficult to predict the changes, the long-term effects and future response to changes necessary.</p> <p>A detailed analysis of Local Plan policies by officers has concluded that they are sufficiently flexible to respond to changes as they arise while ensuring the conservation and enhancement of the National Park.</p> <p>As such it is considered that there have been no significant changes or information on the nature of changes in economic conditions, their long term effects and the responses that may be necessary which could</p>

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			challenge the delivery of the Plan, including the policy requirements within it and evidence does not indicate the need for a review of Exmoor National Park Local Plan policies.
A7.	<p>There have been no significant changes affecting viability of planned development.</p> <p>PROMPT: You may wish to look at the Building Cost Information Service (BCIS) All-in Tender Price Index, used for the indexation of Community Infrastructure Levy (CIL), or other relevant indices to get a sense of market changes.</p> <p>Consider evidence from recent planning decisions and appeal decisions to determine whether planning policy requirements, including affordable housing, are generally deliverable.</p> <p>Ongoing consultation and engagement with the development industry may highlight any significant challenges to delivery arising from changes in the economic climate.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The Housing strategy in Policy HC-S1 – Housing and associated policies sets out that new affordable housing will be delivered through a ‘Rural Exceptions’ approach which means that sites which would otherwise not be considered suitable in principle for new housing may come forward where there is an identified local need for affordable housing. Generally, 100% local need affordable housing at social rent levels will not be viable and will rely on affordable housing grants.</p> <p>Grants for social rent housing were not available for Exmoor at the point of Local Plan submission. As a consequence, Local Plan policies (HC-S4, HC-D2, HC-D3) provide for the potential to consider Principal Residence housing as cross subsidy where essential to deliver local need housing. Proposals will be considered on a case by case basis through viability assessment using an ‘open book’ approach. This provides flexibility to take account of changes to e.g., build costs which have reportedly seen sharp increases.</p> <p>Evidence on delivery of affordable housing delivery is summarised in AMRs 2017-19, the interim AMR Summary 2019-21, Local Plan 5-Year Review Summary Report and the Housing and Community Topic Paper. There have been no appeal decisions which indicate that a change to</p>

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			<p>the housing strategy is necessary.¹¹ Affordable housing is being delivered - although levels of delivery are lower than hoped. The Rural Housing Enabler's view through consultation was that there is a pipeline of affordable housing and policies are working. It is considered that the reintroduction of grants can help schemes to come forward. However the policy approach is flexible - enabling consideration of Principal Residence where cross subsidy is essential to deliver affordable housing.</p> <p>The reintroduction of national affordable housing social rent grants through identification of North Devon and SWT as areas of affordability challenge has since 2021 provided an uplift in the level of grants available to Registered Providers for schemes of affordable housing across Exmoor. It is considered that this has been a positive change which can significantly improve viability.</p> <p>It is considered that the evidence does not indicate the need for a review of Exmoor National Park Local Plan policies.</p>

¹¹ Exmoor National Park Authority Monitoring Report 2019-21 Interim Summary, ENP Local Plan 5-Year Review Summary Report and Housing and Community Topic Paper May 2022, Appeal Decisions in Exmoor National Park July 2017 - March 2022 and Exmoor National Park Planning and Enforcement Allowed Appeals 2017-2022 [Exmoor - Exmoor National Park Local Plan 5-Year Review \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk)

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A8.	<p>Key site allocations are delivering, or on course to deliver, in accordance the local plan policies meaning that the delivery of the spatial strategy is not at risk.</p> <p>PROMPT:</p> <p>Identify which sites are central to the delivery of your spatial strategy. Consider if there is evidence to suggest that lack of progress on these sites (individually or collectively) may prejudice the delivery of housing numbers, key infrastructure or other spatial priorities. Sites may be deemed to be key by virtue of their scale, location or type in addition to the role that may have in delivering any associated infrastructure.</p>	N/a, In the context of the Plan strategy, Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The adopted Local Plan does not contain any site allocations. For housing, this is consistent with the Plan housing strategy (HC-S1 - Housing and associated policies) which seeks to deliver housing needed by local communities, prioritising local need affordable housing through a rural exceptions approach without a housing target or allocations. Commentary on affordable housing delivery is provided above.</p> <p>As a high proportion of Exmoor’s businesses are micro-businesses (some of which are very small, even within the context of the national definition of a micro-business), and high levels of self-employment, the Local Plan employment strategy (SE-S1, SE-S2, SE-S3) does not allocate land for employment. Instead the focus is on safeguarding existing employment / business sites to ensure a future supply of sites and buildings and a flexible criteria based approach to enable new employment/business proposals, including home-based businesses (SE-D1) to come forward as needed. Monitoring evidence is set out in the AMR Interim Summary 2019-21, the Local Plan 5-Year Review Summary Report and Economy Topic Paper.¹²</p>

¹² Exmoor National Park Authority Monitoring Report 2019-21 Interim Summary, ENP Local Plan 5-Year Review Summary Report and Economy Topic Paper May 2022, [Exmoor - Exmoor National Park Local Plan 5-Year Review \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk)

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A9.	<p>There have been no significant changes to the local environmental or heritage context which have implications for the local plan approach or policies.</p> <p>PROMPT: You may wish to review the indicators or monitoring associated with your Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) / Habitats Regulations Assessment (HRA).</p> <p>Identify if there have been any changes in Flood Risk Zones, including as a result of assessing the effects of climate change.</p> <p>Consider whether there have been any changes in air quality which has resulted in the designation of an Air Quality Management Area(s) or which could result in a likely significant effect on a European designated site which could impact on the ability to deliver housing or employment allocations.</p> <p>Consider whether there have been any changes to Zones of Influence / Impact Risk Zones for European sites and Sites of Special Scientific Interest or new issues in relation to, for example, water quality.</p> <p>Consider whether there have been any new environmental or heritage designations which could impact on the delivery of housing or employment / jobs requirements / targets.</p> <p>Consider any relevant concerns being raised by statutory consultees in your area in relation to the determination of individual planning applications or</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The Local Plan 5-Year Review Summary Report and Environment Topic Paper provide a review of evidence, including consultation responses related to the environment.¹³ Natural England have confirmed that biodiversity net gain can be delivered within the existing policies and raising a number of matters which are either addressed through the Local Plan or which can be addressed through appropriate environmental requirements as part of decision-making.</p> <p>Historic England have confirmed their view that policies do not need to be reviewed.</p> <p>The NPA has declared a climate emergency. Climate change has been raised by a number of stakeholders – views include that the policies should be stronger.¹⁴ It is considered that while there is potential to strengthen existing policies, adopted plan policies such as GP1 address climate change. GP1 requires opportunities to be taken to consider the needs of future generations and resilience / adaptation to climate change, CC-S3 and associated policies enable actions to mitigate and adapt to climate change including appropriate renewable energy technologies CC-S5, CC-D3 and CC-D4).</p>

¹³ Exmoor National Park Authority Monitoring Report 2019-21 Interim Summary, ENP Local Plan 5-Year Review Summary Report and Environment Topic Paper May 2022. [Exmoor - Exmoor National Park Local Plan 5-Year Review \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk)

¹⁴ Exmoor National Park Local Plan 5-Year Review Stakeholder Workshop Summary, Survey Responses Schedule, 5-Year Review Summary Report and Environment Topic Paper, Authority Monitoring Report 2019-21 Interim Summary. [Exmoor - Exmoor National Park Local Plan 5-Year Review \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk)

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	<p>planning appeals which may impact upon your plan - either now or in the future.</p>		<p>Appeal decisions do not indicate a need to review policies, several have confirmed the flexibility working within existing policies in relation to materials in certain circumstances.¹⁵</p> <p>It is considered that the evidence does not indicate the need for a review of Exmoor National Park Local Plan policies.</p> <p>However further work is being considered to provide additional guidance and raise awareness for applicants e.g. through updating the Local Verification Checklist and planning guidance. A forthcoming Review of the Exmoor National Park Local Plan will consider guidance on sustainability.</p>

¹⁵ Exmoor National Park Planning and Enforcement Allowed Appeals 2017-2022, [Exmoor - Exmoor National Park Local Plan 5-Year Review \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk/exmoor-national-park-local-plan-5-year-review)

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A10.	<p>No new sites have become available since the finalisation of the adopted local plan which require the spatial strategy to be re-evaluated.</p> <p>PROMPT:</p> <p>Consider if there have been any new sites that have become available, particularly those within public ownership which, if they were to come forward for development, could have an impact on the spatial strategy or could result in loss of employment and would have a significant effect on the quality of place if no new use were found for them.</p> <p>Consider whether any sites which have now become available within your area or neighbouring areas could contribute towards meeting any previously identified unmet needs.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The adopted Local Plan does not contain any site allocations. For housing, this is consistent with the Plan housing strategy (HC-S1 - Housing and associated policies) and the Local Plan employment strategy (SE-S1, SE-S2, SE-S3)</p> <p>Duty to Cooperate discussions with neighbouring authorities have not raised concerns. Statements of Common Ground have been agreed. Matters for future discussion and opportunities for joint working including though Duty to Co-operate have been identified including the potential for employment sites around Minehead. Local Plan 5-Year Review Duty to Co-operate outcomes are summarised in the Local Plan 5-Year Review Summary Report and Topic Papers.¹⁶</p>

¹⁶ [Exmoor - Exmoor National Park Local Plan 5-Year Review \(exmoor-nationalpark.gov.uk\)](http://exmoor-nationalpark.gov.uk)

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A11.	<p>Key planned infrastructure projects critical to plan delivery are on track and have not stalled / failed and there are no new major infrastructure programmes with implications for the growth / spatial strategy set out in the plan.</p> <p>PROMPT: You may wish to review your Infrastructure Delivery Plan / Infrastructure Funding Statement, along with any periodic updates, the Capital and Investment programmes of your authority or infrastructure delivery partners and any other tool used to monitor and prioritise the need and delivery of infrastructure to support development.</p> <p>Check if there have been any delays in the delivery of critical infrastructure as a result of other processes such as for the Compulsory Purchase of necessary land.</p> <p>Identify whether any funding announcements or decisions have been made which materially impact upon the delivery of key planned infrastructure, and if so, will this impact upon the delivery of the Local Plan.</p>	N/A In the context of the Plan strategy, Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>In Exmoor National Park, infrastructure is generally small scale. Duty to Co-operate discussions with neighbouring authorities have not raised any concerns including the need for infrastructure. Statements of Common Ground have been signed with neighbouring authorities. Opportunities have been identified as future matters for joint working through Duty to Co-operate.</p>

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A12.	<p>All policies in the plan are achievable and effective including for the purpose of decision-making.</p> <p>PROMPT: Consider if these are strategic policies or those, such as Development Management policies, which do not necessarily go to the heart of delivering the Plan’s strategy.</p> <p>Identify if there has been a significant increase in appeals that have been allowed and /or appeals related to a specific policy area that suggest a policy or policies should be reviewed.</p> <p>Consider whether there has been feedback from Development Management colleagues, members of the planning committee, or applicants that policies cannot be effectively applied and / or understood.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>An analysis of appeals has been carried out, while there has been some increase in the number of appeals from a very low number immediately after adoption, this is not considered to be significant. Internal discussions have been held with officers and members to assess implementation of Plan policies. Evidence from appeal decisions and officer/member discussions do not indicate that a review of plan policies is needed.¹⁷</p> <p>Consideration is being given to the potential for future working to communicate opportunities provided by policies.</p>

¹⁷ ENP Local Plan 5-Year Review Summary Report May 2022, Appeal Decisions in Exmoor National Park July 2017 - March 2022 and Exmoor National Park Planning and Enforcement Allowed Appeals 2017-2022 [Exmoor - Exmoor National Park Local Plan 5-Year Review \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk)