

## Response to 'Planning for the Future' Consultation, October 2020

The Exmoor Society is an independently run charity that has campaigned for over 60 years to inspire everyone to enjoy and look after Exmoor National Park.

- Exmoor National Park is home to rare and beautiful landscapes, habitats and key environmental resources, all concentrated within a very small area. It is shaped by farming and peculiarly vulnerable to development and unsympathetic land use even on a small scale. Many of the benefits that Exmoor provides, including economic growth from tourism and farming, well-being to its residents and visitors, scenic beauty, wildlife and ecosystem services like water provision and carbon storage, rely on the high quality of its environment. We are concerned that the current proposals place too little emphasis on the wider role that planning plays in protecting this environment and delivering the statutory purposes of National Parks.
- Exmoor National Park Authority along with other NPAs has the responsibility both for plan making and planning decisions within its area – this is exceptional for England where planning is usually undertaken by the local authority. Comprising both local and national members appointed for their relevant expertise, the National Park Authorities are a successful part of the current system. The constitution of their committees means that they represent the balance of interests that allows them to oversee the fulfilment of the Parks' statutory purposes while responding to local development needs. It is of concern that there is no reference to the working of the National Park Authorities in the white paper as it is critical to the protection of National Parks that a dedicated planning authority, including nationally appointed members, remains in place.
- *Planning for the Future* provides an opportunity to reinforce the principles underpinning the 25 Year Environment Plan and emerging environmental legislation. Planning can help to address the climate and ecological crises and the Exmoor Society would encourage an approach that puts the enhancement of Natural Capital, including both natural and cultural assets, at the heart of any planning system. It is concerned that as the proposals stand there is not sufficient emphasis on the role of planning in advancing a broad environmental and conservation agenda.
- The Exmoor Society welcomes the ambition to 'build beautiful' but is concerned that the current proposals do not articulate a similar ambition for the protection of landscape character and quality. At the moment the proposals contain no reference at all to natural and scenic beauty or cultural heritage, all very important considerations when making planning decisions which affect National Parks.
- It is vital that while the planning system provides strong support for the protection and improvement of designated landscapes it must also recognize that they are living and working places. It is important to clarify that the zoning for 'protection' will still allow for the development of Exmoor's local communities within the constraints of National Park purposes.
- Planning has a role in delivering the purposes of National Parks and *Planning for the Future* is an opportunity to address shortcomings in their existing protection. Julian Glover's *Landscapes Review* proposes that the weak duty of neighboring planning authorities to 'have regard' to the purposes of the National Park when they consider the impact of any planning decisions urgently needs to be strengthened to the duty of 'furthering' the National Parks' purposes. Likewise, Glover proposes that Permitted Development Rights within protected landscapes need to be clarified. Currently this enables excessive and often unsympathetic development in open countryside and farms, something to which Exmoor is especially exposed. The Exmoor Society endorses both these proposals.
- In their pursuit of a system that will produce planning speed and clarity, the proposals reduce the opportunity for democratic oversight and input from the National Park Authorities. A system that only allows input at the early and more abstract stage of the development of a local plan - rather than on individual applications as and when they are made - is too inflexible and unlikely to garner the participation a democratic process requires. Importantly, National Parks will also require bespoke policies and delivery approaches for the provision of affordable housing.