

DARTMOOR NATIONAL PARK AUTHORITY

6 March 2020

FEEES AND CHARGES 2020/21Report of the Head of Business SupportRecommendation: **That Members**

- (i) **Approve the 2020/21 schedule of fees and charges as set out in Appendix 2 (subject to any further amendments proposed at the meeting)**
- (ii) **That delegated authority be given to the Chief Executive (National Park Officer) to terminate the service level agreement with West Devon Borough Council at the most effective date**

1 Background

- 1.1 The Authority is responsible for a number of services for which fees are permitted to be charged in order to offset the costs involved. The Government requires that Local Authorities should raise revenue wherever possible to cover costs, which means that fees and charges (which include suggested donations) are reviewed and approved on an annual basis.

2 Current Situation

- 2.1 The Authority needs to consider the fees and charges for each financial year during the budget setting process. Whilst many are not a major source of income, they do contribute to meeting the costs of delivering some services. The charges applied may be the difference between providing a service and having to withdraw it all together.
- 2.2 The fees and charges for the current year were approved by the Authority in January 2019 (NPA/19/001). Changes made for the 2019/2019 financial year included:
 - Charges for public path order work were increased to reflect increased costs (Officer time)
 - The new Youth Ranger Programme was introduced with a £50 per person charge
 - Where staff time is charged out either per hour or day, the prices were uplifted to reflect recent pay awards
- 2.3 The changes made in the previous year (i.e. 2018/19) were as follows:
 - Annual Ranger Ralph membership fee (first introduced in 2011 at £5) was increased to £10 (target price);
 - Guided walks adult charge was increased from £5 to £6;
 - Guided walks, children's Activities were increased from £4 to £5;
 - Education walks - the charge for walks up to 3 hour were increased from £55 to £60 and for walks up to 6 hours from £70 to £75;
 - Introduced formal car park charges at Haytor, Postbridge and Meldon Reservoir

- 2.4 Appendix 1 provides information on the budgeted level of income expected from fees and charges for 2019/20 i.e., the projected outturn against budget and the outturn comparator for 2018/19.
- 2.5 It should be noted that this report does not include Planning Application Fees as these are set centrally by Government.
- 2.6 The Authority started formally charging for car parking at Princetown in 2013 and at Haytor, Postbridge and Meldon Reservoir in 2018. A prudent budget was set in 2018/19 based on experience i.e. the income generated at Princetown since 2013. This was then updated for 2019/20. It is pleasing to note that income received from all of the car parks was £75,000 in 2018/19 and is anticipated to be the same for 2019/20. After deducting the initial installation and annual running costs, the surplus income is then used for maintenance and improvements.
- 2.7 The management of the Princetown car park is currently undertaken by West Devon Borough Council (WDBC), on our behalf, via a Service Level Agreement, taking 20% of the gross income as their fee. The other car parks are managed by the Authority.
- 2.8 Members decided in March 2019 not to increase car parking charges for the 2019/20 financial year, but asked Officers to look into the feasibility of introducing an annual pass or season ticket; as they believed there was a need. Officers undertook a public consultation / survey with the public during 2019 to ascertain their views and to gauge the potential take-up. The results of the survey were presented to the Park Management Working Panel on 11 October 2019; the outcome of which demonstrated take-up of an annual pass or season ticket would not be significant and costs would outweigh any benefits. Members agreed to not introduce this scheme.

3 Fees and charges for 2020/21

- 3.1 The proposed schedule of fees and charges for 2020/21 is attached at Appendix 2. Many often remain unchanged for several years at a time as they are individually so small, increasing them annually by just inflation for instance, would be inefficient.
- 3.2 Car parking charges have not changed since 2013 and Members have discussed the matter many times. There is a difficult balance to be struck between providing access and facilities (which cost money) with not putting barriers in place that might prevent access. Car parking charges are currently the only fees (within the Authority's control) that generate a significant revenue. Costs to maintain our car parks are significant, averaging £90k per annum and are projected to rise.
- 3.3 Members of the Audit and Governance Committee were consulted on proposals to increase car parking charges at their meeting on 7 February 2020. After considerable debate, recognising the increasing costs and the need to provide facilities and access to the public, along with financial modelling information, Members recommended that the following proposals be brought to the Authority for approval:
- Revisit the current Service Level Agreement (SLA) with West Devon Borough Council, with a view to possible withdrawal from the SLA, so that operational arrangements mirror those for Postbridge, Meldon and Haytor

- That contactless payment card readers are installed into all parking machines (to allow easier payment and reduce the need for small change to be carried or held at the Visitor Centres)
- That car parking charges are increased from 1 April 2020 as follows:

Car parking charges	2019/20	2020/21
Cars – Half day (up to 3 hours)	£1.00	£2.00
Cars – Full day	£2.00	£3.00
Blue Badge Holders	£1.00	£2.00
Coaches	£4.00	£5.00

3.4 It is anticipated that the software in the parking machines and any associated signage can be updated at the beginning of April. If the charges are approved today, we will arrange for advance notice signage to be displayed immediately.

3.5 Arrangements to end the SLA with WDBC will take a little longer, as notice need to be given to withdraw from the SLA and determination of future arrangements regarding the Off Street Places Parking Order in place at Princetown are to be confirmed. Officers are currently seeking advice and discussing this with WDBC.

4 Financial Implications

4.1 Most of the Authority's fees and charges (excluding planning fees) are not a major income source for the Authority and the income forecast for the end of the 2019/20 financial year is likely to be circa £95,000; which is approximately £10,000 less than 2018/19.

4.2 Car parking charges are providing a fairly substantial and stable income source, which is used to maintain the infrastructure that provides accessibility for the public. The proposed increase in charges for 2020/21 should generate enough income to sustain the current operational, maintenance and repair costs of circa £90k per annum.

4.3 The cost of installing contactless payment card readers in six machines, of £10,200, will be met from the 2019/20 Project Fund and will be carried forward if the install cannot be undertaken before the year end.

4.4 This new schedule of fees and charges has been incorporated into the 2020/21 Revenue Budget.

5 Equality and Impact Assessment

5.1 The implications for access to services and the economy of the area are fully considered and addressed in all of the Authority's policies, especially when considering charging for services. Consideration is given to proactively engaging those who may not otherwise access Dartmoor, being mindful of potential barriers and balancing the need to generate income and maintaining budgets that are flexible and responsive to the needs of service users.

DONNA HEALY

Background Papers: NPA/19/001; NPA/AG/20/002

Attachments: Appendix 1 - Income to date for 2019/20
Appendix 2 - Proposed fees and charges 2020/21

20200306 DH Fees and Charges 2020/21

Fees and Charges	2018/19 Outturn	2019/20 Budget	2019/20 Forecast Outturn	
	£	£	£	
Pre Application Advice	(8,995)	(16,000)	(12,000)	Pre-app service suspended for part of the year
Filming	(14,975)	0	(1,100)	
Room Hire & refreshments (Parke)		0	(300)	
Photocopying	(67)	(50)	(50)	
Guided Walks	(2,050)	(250)	(1,196)	
Education Events	(772)	0	(500)	
Education Walks	(3,165)	(2,600)	(2,600)	
Ranger Ralph	(1,038)	(950)	(950)	
Junior Ranger programme	(1,325)	(375)	(375)	
Youth Rangers	0	(500)	(500)	
Car Parking:				
Princetown	(24,335)	(20,000)	(25,000)	
Haytor Upper	(8,232)	(5,000)	(8,500)	
Haytor Lower	(14,008)	(9,000)	(15,000)	
Postbridge	(15,018)	(11,000)	(15,500)	
Meldon	(10,364)	(5,000)	(11,000)	
Total	(104,344)	(70,725)	(94,571)	

**DARTMOOR NATIONAL PARK AUTHORITY
FEES AND CHARGES 2017/18**

Appendix 2 to Report No. NPA/20/003

Description of Charges Levied (or Donations suggested)	Unit	2019/20 Rates (VAT @ 20%) £			2020/21 Rates (VAT @ 20%) £		
		NET (£)	VAT (£)	GROSS (£)	NET (£)	VAT (£)	GROSS (£)
Administration							
Photocopying - Black and White (charges for sizes over A3 as for plans below)	A4 per side	0.25	0.05	0.30	0.25	0.05	0.30
	A3 per side	0.25	0.05	0.30	0.25	0.05	0.30
Photocopying - Colour (charges for sizes over A3 as for plans below)	A4 per side	0.38	0.08	0.45	0.38	0.08	0.45
	A3 per side	0.38	0.08	0.45	0.38	0.08	0.45
Plan Copying – Colour (subject to copyright)	A4 per side	0.38	0.08	0.45	0.38	0.08	0.45
	A3 per side	0.38	0.08	0.45	0.38	0.08	0.45
	A2 per side	0.67	0.13	0.80	0.67	0.13	0.80
	A1 per side	1.17	0.23	1.40	1.17	0.23	1.40
	A0 per side	2.17	0.43	2.60	2.17	0.43	2.60
<i>NB: Copying charges that total less than £1 will be waived</i>							
Microfilm Copying		As photocopying			As photocopying		
Private Telephone Calls		Actual time			Actual time		
Private Faxes		Actual time			Actual time		
Development Management							
Planning Application Fees		See "Government Scale Charges"			See "Government Scale Charges"		
Pre Application Fees:							
Class A: Residential between 31-149 dwellings / Non-residential floor space 5,000-9,999 sq.m - 1 meeting		550.00	110.00	660.00	550.00	110.00	660.00
Class A: Additional meeting fee		275.00	55.00	330.00	275.00	55.00	330.00
Class B: Residential between 10-30 dwellings / Non-residential floor space 1,000-4,999 sq.m - 1 meeting		366.67	73.33	440.00	366.67	73.33	440.00
Class B: Additional meeting fee		183.33	36.67	220.00	183.33	36.67	220.00
Class C: Residential (including holiday lets) between 3-9 dwellings / Non-residential floor space 500-999 sq.m - 1 meeting		275.00	55.00	330.00	275.00	55.00	330.00
Class C: Additional meeting fee		137.50	27.50	165.00	137.50	27.50	165.00
Class D: Residential 1-2 dwellings (including replacement dwellings) including change of use to, conversion & holiday lets / Non-residential floor space up to 499 sq.m - 1 meeting		137.50	27.50	165.00	137.50	27.50	165.00
Class D: Additional meeting fee		45.83	9.17	55.00	45.83	9.17	55.00
Class E: Advertisements / telecommunications proposals/ Change of use where no operational development (except residential / holiday let) - 1 meeting		91.67	18.33	110.00	91.67	18.33	110.00
Class F: Listed Building where site visit involved		108.33	21.67	130.00	108.33	21.67	130.00
Class F: Additional meeting fee		54.17	10.83	65.00	54.17	10.83	65.00
Class G: Other minor development including agricultural based development - 1 meeting		70.83	14.17	85.00	70.83	14.17	85.00
Class G: Additional meeting fee		37.50	7.50	45.00	37.50	7.50	45.00
Class H: Domestic Scale Renewable energy - solar, wind, hydro Free unless site visit required		108.33	21.67	130.00	108.33	21.67	130.00
Class H: Non Domestic Scale Renewable energy - solar, wind, hydro		137.50	27.50	165.00	137.50	27.50	165.00
Class H: Additional meeting fee		45.83	9.17	55.00	45.83	9.17	55.00
Copy of Section 52/106 Agreement		Charge per page in scale of photocopying charges above subject to maximum charge of £10.00 (inc VAT)			Charge per page in scale of photocopying charges above subject to maximum charge of £10.00 (inc VAT)		
Copy of Decision Notice							
Copy of Enforcement Notice							
Copy of Appeal Decisions							
Copy of Appeal Statement							
Copy of Tree Preservation Order							
Planning Search		10.00	2.00	12.00	10.00	2.00	12.00
All postal requests carry a minimum £2 postage/administration charge. Actual postage will be charged if in excess of £2		1.67	0.33	2.00	1.67	0.33	2.00
Agenda – Copies of Minutes/Reports/One off requests		Charge per page (inc VAT)			Charge per page (inc VAT)		

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FEES AND CHARGES 2017/18**

Description of Charges Levied (or Donations suggested)	Unit	2019/20 Rates (VAT @ 20%) £			2020/21 Rates (VAT @ 20%) £		
		NET (£)	VAT (£)	GROSS (£)	NET (£)	VAT (£)	GROSS (£)
Meeting Room Hire							
Parke							
Meeting Room	Half Day (up to 4 hrs)	80.00	EXE	80.00	80.00	EXE	80.00
	All Day (over 4 hrs)	160.00	EXE	160.00	160.00	EXE	160.00
	Refreshments per delegate:						
	1st serving	1.92	0.38	2.30	1.92	0.38	2.30
	2nd serving	1.33	0.27	1.60	1.33	0.27	1.60
Cancellation charges	Notice of cancellation of 48 hours or more	No Charge			No Charge		
	Notice of cancellation 24 to 48 hours	50% Charge			50% Charge		
	Notice of cancellation less than 24 hours	Full Charge			Full Charge		
High Moorland Office							
Room 1	1 hour	20.00	EXE	20.00	20.00	EXE	20.00
	Half Day (up to 4 hrs)	45.00	EXE	45.00	45.00	EXE	45.00
	All Day (over 4 hrs)	70.00	EXE	70.00	70.00	EXE	70.00
	Evening Room Hire (per hour)						
	Refreshments per delegate:						
	1st serving	1.92	0.38	2.30	1.92	0.38	2.30
2nd serving	1.33	0.27	1.60	1.33	0.27	1.60	
Car Parking at Princetown, Haytor Upper and Lower, Postbridge, Meldon							
Cars - Full Day		1.67	0.33	2.00	2.50	0.50	3.00
Cars - Half day (up to 3 hours)		0.83	0.17	1.00	1.67	0.33	2.00
Blue Badge Holders		0.83	0.17	1.00	1.67	0.33	2.00
Coaches		3.33	0.67	4.00	4.17	0.83	5.00
Guided Walks and Education Walks							
Guided Walks	Adult	6.00	EXE	6.00	6.00	EXE	6.00
	14 years & under	FREE OF CHARGE			FREE OF CHARGE		
Children's Activities	Children (accompanying adult free)	5.00	EXE	5.00	5.00	EXE	5.00
Private talks	Higher Uppacott - per group (max 20)	60.00	EXE	60.00	60.00	EXE	60.00
Education Walks	Walks up to 3 hours (per guide = 25 children)	60.00	EXE	60.00	60.00	EXE	60.00
	Walks up to 6 hours (per guide = 25 children)	75.00	EXE	75.00	75.00	EXE	75.00
Ranger Ralph	Annual subscription (per child)	10.00	ZERO	10.00	10.00	ZERO	10.00
	Events	FREE OF CHARGE			FREE OF CHARGE		
Junior Ranger Programme	Annual subscription (per child)	25.00	ZERO	25.00	25.00	ZERO	25.00
Youth Ranger Programme	Annual subscription	50.00	ZERO	50.00	50.00	ZERO	50.00
Higher Uppacott	Bespoke Events	Delegated to Director of Conservation and Communities			Delegated to Director of Conservation and Communities		

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Legal Services							
Public Path Orders:							
Public path orders: Advertisements x 2	Per advert	See Below			See Below		
Preparing order, all officer time, administration, postage, legal costs, site visits, notices, negotiations with users etc.	Unopposed orders	£1,000.00 plus advertising costs (plus VAT)			£1,000.00 plus advertising costs (plus VAT)		
	Additional orders linked to above	£400.00 plus advertising costs (plus VAT)			£400.00 plus advertising costs (plus VAT)		
	Opposed orders	£2,000 - £3,000 plus advertising costs (plus VAT)			£2,000 - £3,000 plus advertising costs (plus VAT)		
	Temporary closures	£600.00 plus advertising costs (plus VAT)			£600.00 plus advertising costs (plus VAT)		
	Extending a Temporary closure & submission to Secretary of State	£60 per hour + Advertising costs + VAT (minimum charge £500)			£60 per hour + Advertising costs + VAT (minimum charge £500)		
	Informal Consultations (includes consulting with interested parties, summarising responses and Authority Report)	400	80	480	400	80	480
Legal charges	Per hour	80-140	OOS	80-140	80-140	OOS	80-140
Copy / Inspection of Deeds or Documents (held in secure storage)	Per document	37.50	7.50	45.00	37.50	7.50	45.00
Section 106 agreements	Per hour	Not applicable - service provided by DCC			Not applicable - service provided by DCC		
Certification of a document	Per document	4.17	0.83	5.00	4.17	0.83	5.00
Supply data to:	Non Public Body	40.00	8.00	48.00	40.00	8.00	48.00
Environmental Information Regulations		NET (£)	VAT (£)	GROSS (£)	NET (£)	VAT (£)	GROSS (£)
Disbursement Costs:							
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	A0 per side	2.17	0.43	2.60	2.17	0.43	2.60
Microfilm Copying		As photocopying			As photocopying		
Staff Time:	Search for Information. Identification & location of information. Retrieval of information. Copying of information. Collating & despatching of information.	£25 per hour (pro rata)			£25 per hour (pro rata)		
For every members of staff or agency staff involved in considering or dealing with a request for information		VAT will only be charged if the information could be obtained elsewhere			VAT will only be charged if the information could be obtained elsewhere		
Filming on DNP Land (owned or managed)		NET (£)	VAT (£)	GROSS (£)	NET (£)	VAT (£)	GROSS (£)
Feature films		From £2,500 plus VAT			From £2,500 plus VAT		
TV Feature / Mini series / Drama		From £500 to £1,500 plus VAT			From £500 to £1,500 plus VAT		
TV Documentary / Children's		From £250 to £1,000 plus VAT			From £250 to £1,000 plus VAT		
Advertising / Promotional		£,1,200 plus VAT			£,1,200 plus VAT		
Commercial Photo Shoot		From £1,000 to £2,000 plus VAT			From £1,000 to £2,000 plus VAT		
National Park staff time		£60 per hour / £360 per day plus VAT			£60 per hour / £360 per day plus VAT		
Aerial Footage (including stock footage)		Price on application			Price on application		
News, current affairs or educational / schools		Free of charge			Free of charge		
Officer support for Filming and / or Event Management		NET (£)	VAT (£)	GROSS (£)	NET (£)	VAT (£)	GROSS (£)
National Park staff time		£60 per hour / £360 per day plus VAT			£60 per hour / £360 per day plus VAT		

**DARTMOOR NATIONAL PARK AUTHORITY
FEES AND CHARGES 2017/18**

Description of Charges Levied (or Donations suggested)	Unit	2019/20 Rates (VAT @ 20%) £			2020/21 Rates (VAT @ 20%) £		
		NET (£)	VAT (£)	GROSS (£)	NET (£)	VAT (£)	GROSS (£)
Miscellaneous							
Closure of car parks for filming, large scale or other events (minimum charge)	Low season (1 Oct - 31 March)	150.00	30.00	180.00	150.00	30.00	180.00
	High season (1 April - 30 Sept)	300.00	60.00	360.00	300.00	60.00	360.00
Creation of maps for external bodies (GIS)	Fixed cost based on half day	41.67	8.33	50.00	41.67	8.33	50.00
	Hourly rate above half day	16.67	3.33	20.00	16.67	3.33	20.00
Gateway Repair	Per Gateway (per hour - minimum 2hrs)	45.00	9.00	54.00	45.00	9.00	54.00
	Drilling/Gluing per fixing	20.00	4.00	24.00	20.00	4.00	24.00
	Fittings	6.00	1.20	7.20	6.00	1.20	7.20
Gateposts	Repair per post - or individually priced	75.00	15.00	90.00	75.00	15.00	90.00
	Replacement - plus cost of commercially sourced post	75.00	15.00	90.00	75.00	15.00	90.00
Dartmoor Hill Farm Project Membership Scheme		50.00	10.00	60.00	50.00	10.00	60.00
Conservation Works Team - staff time		£60 per hour			£60 per hour		

DARTMOOR NATIONAL PARK AUTHORITY

6 March 2020

TREASURY MANAGEMENT AND INVESTMENT STRATEGY 2020/21Report of the Head of Business Support

Recommendation: That the Authority approves the 2020/21 Treasury Management & Investment Strategy (Appendix 1)

1 Introduction

- 1.1 In March 2018, following the publication of a revised Code of Practice for Treasury Management (the Code) the Authority adopted a revised Treasury Management Policy Statement together with a statement of its Treasury Management Practices (TMPs). No changes are proposed to these policies for 2020/21.
- 1.2 The policy requires the Authority to consider a treasury strategy report, setting out the strategy and plans to be followed in the coming year as part of the budget process. The Strategy for 2020/21 is consistent with that adopted for 2019/20.

2 Treasury Management and Investment Strategy

- 2.1 The Treasury Management and Investment Strategy is set out at Appendix 1. The Authority has investments that average circa £2.5m during the year 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 risk is therefore central to the Authority's prudent financial management. The overriding objective continues to be to invest prudently, with priority being given to security and liquidity before yield.
- 2.2 The Authority's capital spend is commonly of a small scale nature, e.g. acquisition of vehicles or IT. We are, however, currently building an extension to Postbridge Visitor Centre which is being 100% externally funded.
- 2.3 The Authority has no current plans to borrow and funds capital expenditure from National Park Grant, earmarked reserves, capital receipts (if held) or external funding (grant scheme bids) which means that many of the *Prudential Indicators* are not applicable to us. However, from 1 April 2020, due to the implementation of "*International Financial Reporting Standard 16 - Leasing*", the Authority will have external borrowing in relation to the leasing contracts that it currently holds or enters into in the future (for property, plant and equipment). All current "*operating leases*" unless of low value or of less than 12 months duration, will become "*finance leases*". This has the "*accounting*" effect of bringing lease liabilities onto the balance sheet, which counts as "*debt*" as far as the *Prudential Code* is concerned.
- 2.4 However, as this "*debt*" relates to transactions that the Authority has already approved, this will be purely an administrative task of increasing (or originating) *Prudential Code Indicator limits* reflecting the newly recognised "*historical debt*". The "*indicators and limits*" will just describe what has already happened, rather than providing any control. Until CIPFA issues full guidance and the *2021/22 Financial*

Reporting Code, only preparatory work can be done. The 2020/21 *Prudential Indicators* and the *Minimum Revenue Provision calculation* and Policy will be updated during the 2020/21 year, rather than at the start, once we have undertaken the work necessary to ascertain reliable lease liability values for the Balance sheet. Further information will also become available as we close the 2019/20 Financial Year.

3 Conclusion

- 3.1 The Authority's arrangements for treasury management are maintained at a high standard. The Head of Business Support continues to consult with Devon County Council's Assistant County Treasurer (Investments and Treasury Management) to investigate opportunities to maximise the Authority's investment income and will bring a report to the Authority for approval if changes to our practices are proposed.

DONNA HEALY

TREASURY MANAGEMENT AND INVESTMENT STRATEGY 2020/21

1. Introduction

The Treasury Management Strategy sets out the Authority's policies in relation to: the management its cash flows, its banking, borrowing and investment strategies, monitoring of the level of debt (if it has any) and funding of the capital programme. The Treasury Management Strategy should be read in conjunction with the Capital Strategy, which is included in the annual Budget Report.

In February 2018, following the publications of a revised Code of Practice for Treasury Management by the Chartered Institute of Public Finance and Accountancy (CIPFA) the Authority adopted a revised Treasury Management Policy Statement together with a statement of Treasury Management Practices (TMPs). No changes are proposed to these policies for 2019/20.

This Treasury Management Strategy document sets out:

- Minimum revenue provision;
- Capital expenditure funding;
- The current treasury position, debt and investments;
- Prospects for interest rates;
- The borrowing strategy;
- Prudential indicators on impact of capital financing and monitoring of the level and make-up of debt;
- The investment strategy.

2. Minimum Revenue Provision

Minimum Revenue Provision (MRP) is a charge to the Authority's revenue accounts to make provision for the repayment of external debt and internal borrowing; there is a statutory obligation to charge the revenue account an annual amount of MRP.

3. Capital Expenditure

The Authority rarely has a capital programme; capital spend is commonly of a small scale nature such as related to the acquisition of vehicles or IT. For any larger schemes, such as extending or building Visitor Centres, the Authority receives a specific report to support the decision making. The current Medium Term Financial plan period does contain proposals to replace three vehicles; the replacement of the Development Management IT system, the refurbishment of Higher Uppacott Cottage and the completion of the extension to Postbridge Visitor Centre; which will be funded from a mixture of National Park Grant, capital receipts and external funding.

4. Prudential Indicators

Capital Financing Requirement - this represents the Authority's underlying debt position, showing how the previous and future spend for capital purposes has been or will be financed by borrowing or entering into other long-term liabilities.

Authorised Limit for total external debt - this represents the level at which the Authority is able to borrow and enter into long-term liabilities. Additional borrowing beyond this limit is prohibited without Authority approval. The Authorised limit is currently set at £100,000 (representing the Authority's available bank overdraft facility).

Operational Boundary - this is based on the anticipated level of external debt needed during the year. Variations in cash flow can lead to occasional, short term breaches of the operational boundary that are acceptable. Sustained breaches would be an indication that there may be a danger of exceeding authorised limits. The Operational Boundary is currently set at £100,000 (representing the Authority's available bank overdraft facility).

Underlying Borrowing Requirement to Gross Debt - the Authority needs to ensure that its gross debt does not, except in the short term, exceed the Capital Financing Requirement.

Ratio of Financing Costs to Net Revenue Stream - this shows the relationship between Capital Financing Costs and the net Revenue Stream.

In the past, as the Authority was debt free many of the Prudential Indicators and the Minimum Revenue Provision charge did not apply, except those as set out above. However, due to the implementation of "*International Financial Reporting Standard 16 - Leasing*" from 1 April 2020, the Authority will have external borrowing in relation to leasing contracts that it currently holds, or for those it enters into in the future (for property, plant and equipment). All previously held "*operating leases*" unless of low value or of less than 12 months duration, will become "*finance leases*". This has the "*accounting*" effect of bringing lease liabilities onto the balance sheet, which counts as "*debt*" as far as the *Prudential Code* is concerned. However, as this "*debt*" relates to transactions that the Authority has already entered into this will be purely an administrative task of increasing (or originating) *Prudential Code Indicator limits* reflecting the newly "*recognised debt*". The "*indicators and limits*" will just describe what has already happened, rather than providing any control. Until CIPFA issues full guidance and the *2021/22 Financial Reporting Code*, only preparatory work can be done. The *2020/21 Prudential Indicators* (listed in this document) will be calculated and revised in the next few months and Members will be updated accordingly, once we have undertaken all of the work necessary to ascertain reliable lease liability values for the Balance sheet. This will also apply to the Minimum Revenue Provision calculation and Policy.

5. Treasury Management Prudential Indicators

These relate to the fixed and variable rates of interest on loans and borrowings. As the Authority does not have any external borrowing, these indicators do not apply.

6. Monitoring the Indicators

It is important to monitor performance against forward looking indicators and the requirement that borrowing should only be for capital purposes. If we had borrowing, it would be monitored daily against the operational boundary and authorised limit. If these limits were to be breached, a report would be brought to the Authority outlining what action would be necessary to prevent borrowing exceeding the limit and the impact on the revenue budget. The indicators for capital expenditure, capital financing requirement,

capital costs and the treasury management indicators are monitored monthly if they apply. Any significant variations would be reported to the Authority.

7. Analysis of Long Term Debt

The Authority has no long term debt.

8. Schedule of Investments

At the time of writing this report the all of the Authority's working capital was being held in its bank accounts and in a Barclays Treasury Deposit Account. The Authority's fixed rate investments as at 31 March 2019 and 31 January 2020 (current) are:

Bank	Maturing in	Actual 31.03.19	Interest Rate %	Current 31.01.20	Interest Rate %
Barclays - term deposits	<365 days	£2,500,000	0.764	2,300,000	0.570

The annual investment returns history and current position is set out below.

2012/13 Actual	2013/14 Actual	2014/15 Actual	2015/16 Actual	2016/17 Actual	2017/18 Actual	2018/19 Actual	2019/20 Forecast
£21,920	£15,000	£17,998	£19,162	£17,950	£10,616	23,505	£21,500

The Authority's cash balance available for investment varies during the year, with the balance building up on a quarterly basis when we receive National Park Grant; it then tapers down at the end of each quarter and towards the end of the financial year. It is anticipated that long term cash balances available for investment at 31 March 2020 will be circa £2 million.

The recent investment performance of the Authority's cash investments has been affected by the low interest rates introduced as part of the measures used to alleviate the global credit crunch. Interest rates have also been impacted by the introduction of new banking regulations requiring banks to hold higher levels of liquidity to act as a buffer.

The rates on offer during 2019/20 continued to be low in comparison to the past, and the returns on the Authority's cash investments are forecast to remain low levels for the foreseeable future. The Treasury Management Strategy will continue to be set in a manner that ensures a prudent and secure approach.

9. Prospects for Interest Rates

Forecasting future interest rate movements even one year ahead is always difficult. The factors affecting interest rate movements are clearly outside the Authority's control. Whilst short term rates are generally linked to the Bank of England's Base Rate, long term rates are determined by other factors e.g. the market in Gilts.

It has been of little surprise that the Bank of England's Monetary Policy Committee (MPC) has left the Bank Rate unchanged at 0.75% throughout 2019 due to the ongoing uncertainty over Brexit and the outcome of the general election. In its meeting on 7 November, the MPC became more dovish due to increased concerns over the outlook for the domestic economy if Brexit uncertainties were to become more entrenched, and for weak global economic growth: if those uncertainties were to materialise, then the MPC

were likely to cut Bank Rate. However, if they were both to dissipate, then rates would need to rise at a “gradual pace and to a limited extent”.

Brexit uncertainty has had a dampening effect on UK GDP growth in 2019, especially around mid-year. There is still some residual risk that the MPC could cut Bank Rate during 2020, as the UK economy is still likely to only grow weakly in 2020, due to continuing uncertainty over whether there could effectively be a no deal Brexit in December 2020, if agreement on a trade deal is not reached with the EU. Until that major uncertainty is removed, or the period for agreeing a deal is extended, it is unlikely that the MPC would raise Bank Rate. When budgeting for interest receipts a prudent approach has been adopted to ensure that, as far as is possible, the budget will be achieved.

10. Borrowing and Debt Management Strategy 2020/21 – 2022/23

As the Authority is debt free and has no current plans to borrow, there is nothing to report under this heading.

11. Investment Strategy 2020/21 – 2022/23

The Authority continues to adopt a very prudent approach to its cash investments and its investments will be “Specified Investments” as defined by the Ministry of Housing, Communities and Local Government (MHCLG). The lending policy is kept under constant review with reference to strict criteria for inclusion in the counterparty list. The Treasury Management Strategy will continue to be set to ensure a prudent and secure approach.

The Authority is required under the guidance in the CIPFA Treasury Management Code of Practice to approve an Annual Investment Strategy. The overall aims of the Authority’s strategy continue to be to:

- Limit the risk to the loss of capital;
- Ensure that funds are always available to meet cash flow requirements;
- Maximise investment returns, consistent with the first two aims; and
- Review new investment instruments as they come to the Local Authority market, and to assess whether they could be a useful part of our investment process.

The overriding objective will be to invest prudently, with priority being given to security and liquidity before yield.

The outlook for cash investment remains challenging. Whereas in the past there has been a perception that Governments would not allow banks to fail, the new regulatory environment has put more emphasis on the requirement for investors to take a hit by funding a “bail-in”. A bail-in is where the bank’s creditors, including local authorities depositing money with them, bear some of the burden by having part of the debt they are owed written off. The balance of risk is therefore changing, and as a result the Authority has considered alternative forms of investment in order to diversify its risk.

Under the Markets in Financial Instruments (MiFID II) directive, local authorities are now classed as retail clients by the Financial Conducts Authority (FCA). This has implications for the range of investments that are available to local authorities. While bank and building society deposits are unaffected by the regulations, some banks have determined that they will only take term deposits from professional clients and a range of alternative forms of investments are only available to professional clients. However, if the local authority meets

the criteria set by the FCA, then it can apply to be “opted up”. The Authority does not meet the criteria to do so.

Specified Investments

Specified Investments will be those that meet the criteria in the MHCLG Guidance i.e. the investment:

- Is sterling denominated;
- Has a maximum maturity of 1 year;
- Meets the “high credit quality” as determined by the Authority or is made with the UK government or is made with a local authority in England, Scotland, Wales or Northern Ireland or a parish or community council;
- The making of which is not defined as capital expenditure under section 25(1)(d) in SI 2003 No 3146 (i.e. the investment is not loan capital or share capital in a body corporate).

Specified investments will include bank and building society deposits. Security is achieved by the creation of an ‘Approved list of Counterparties’. These are the banks, building societies, money market funds and other public bodies with whom we are prepared to deposit funds. In preparing the list, a number of criteria will be used not only to determine who is on the list, but also to set limits as to how much money can be placed with them, and how long that money can be placed for.

Banks are expected to have a high credit rating. The Authority uses the ratings issued by all three of the major credit rating agencies, Fitch, Moody’s and Standard & Poor’s, made available to the Authority via Devon County Council’s Assistant County Treasurer (Investments and Treasury Management), who monitors them daily and advises the Authority accordingly.

The lowest rating published by any of the agencies is used to decide whether an institution is eligible for inclusion. Where the counterparty is only rated by two of the major ratings agencies, the lowest rating published by either of the two is used. This rating also determines the maximum amount which can be loaned to an individual counterparty. Non-Eurozone overseas banks that meet the criteria are included from countries with a high Sovereign rating. The time length of all deposits with financial institutions will be managed prudently, taking account of the latest advice from Devon County Council’s Assistant County Treasurer (Investments and Treasury Management). The Authority’s investments will continue to be in bank deposits.

The ‘Approved List of Counterparties’ specifies individual institutions, and is formally reviewed at least monthly. Notification of credit rating downgrades (or other market intelligence) is acted upon immediately, resulting in any further lending being suspended.

Counterparty Approved List criteria

Counterparty Type		Fitch	Moody’s	Standard & Poors
UK Banks	Not below	A- & F1	A3 & P-1	A- & A-1
UK Building Societies	Not below	A- & F1	A3 & P-1	A- & A-1
Non-Eurozone Overseas Banks	Sovereign rating of	AAA	Aaa	AAA
	And not below	A- & F1	A3 & P-1	A- & A-1
Other Local Authorities		N/A	N/A	N/A

Where the short term rating of a counterparty is one notch below the stated criteria, but the counterparty meets the long-term rating criteria, they may still be used, subject to the advice provided by Devon County Council, who will take into account a range of other metrics in arriving at their advice. The credit ratings shown in the table for banks and building societies allow for greater sensitivity in recognising counterparty risk.

Liquidity in investments is the second key factor in determining our strategy. Funds may be earmarked for specific purposes or may be general balances and this will be a consideration in determining the period over which the investment will be made. All known short-term commitments are covered before lending for over 1 month. Where cash is expected to be available long-term (up to a year) we will maximise the length of time for the deposit in order to obtain the best interest rate possible.

Non-Specified Investments

Non-specified investments are those that do not meet the criteria detailed above, but are intended to be a longer-term investment, generating a higher yield, but with a slightly higher degree of risk e.g. investment in commercial property. The Authority has no non-specified investments.

Interest Rate Targets

For the 2020/21 financial year it has been assumed that the average interest rate earned on short-term lending (to the bank) will be 0.75% p.a. The target rate takes into account that the Bank of England base rate has remained at 0.75% since November 2018. The target set for 2020/21 is considered to be prudent and achievable.

Given the degree of uncertainty about future economic prospects and the level of interest rates, Medium Term Financial Plan forecasts will be based on average rates for lending to banks and building societies continuing to be 0.75% for 2021/22 and 2022/23. However these will be reviewed in the light of changes to the rate on offer to the Authority over the MTFP period.

Investments that are not part of Treasury Management

The revised Code requires the Authority to report on investments in financial assets and property that are not part of treasury management activity, but where those investments are made primarily to achieve a financial return. The Authority does not currently have a policy of making commercial investments outside of its treasury management activity, for both financial and legal reasons. Any capital investment made or held is for the purposes of delivering operational services and must be in accordance with National Park Purposes.

Performance

The primary aim of the Treasury Management Strategy is to maximise interest receipts over the long term, whilst achieving annual budgets, without taking any undue risk.

DARTMOOR NATIONAL PARK AUTHORITY

6 March 2020

BUDGET AND MEDIUM TERM FINANCIAL PLAN 2020/21 to 2022/23Report of the Head of Business SupportRecommendations: **That Members:**

- (i) **approve 2020/21 Budget and Medium Term Financial Plan for the years 2021/22 and 2022/23 as shown in Appendices 1 - 3**
- (ii) **approve the use of Earmarked Reserves balances as set out in Appendix 6 and sections 3.4 and 4.0 of the report**
- (iii) **approve the Capital Investment Strategy as set out in section 5 of the report**

1 Background

- 1.1 The Authority is required by statute to set a balanced revenue budget for each financial year. The basis for the revenue expenditure is the pursuit of the 'Special Purposes' for which the National Parks were designated in the Environment Act 1995 (the Act). Section 65 of the Act determines the purposes as: conserving and enhancing the natural beauty, wildlife and cultural heritage of National Parks and of promoting opportunities for the understanding and enjoyment of the Parks by the public. The Authority also has a duty to seek to foster the economic and social well-being of local communities within the National Park.
- 1.2 The key source of funding for the Authority is National Park Grant (NPG) which is paid by the Department of the Environment, Food and Rural Affairs (Defra). Currently NPG accounts for over 80% of total income. At the time of writing this report Defra has yet to confirm how much NPG the Authority will receive in 2020/21 and beyond. The delay in announcing NPG has an obvious impact on our ability to plan over the medium term.

2 Financial Context

- 2.1 Government Departments were given a single year settlement in the Spending review of September 2019, the Chancellor announced: "This Spending round delivers the fastest planned real growth in day-to-day departmental spending in 15 years. From 2019/20 to 2020/21, day-to-day departmental spending will now grow at 4.1% in real terms"¹.
- 2.2 Defra received a 3.3% real terms increase in its resource budget for 2020/21 (compared to 2019/20).
- 2.3 In September 2019 the independent review of designated landscapes (National Parks and Areas of Outstanding Natural Beauty), led by Julian Glover, published its final report. Amongst the recommendations was the statement: "at the very least we want to see existing budgets for National Parks secured in real terms and sustained for at least a further five year period, so they can plan ahead with confidence".²

¹ <https://www.gov.uk/government/publications/spending-round-2019-document/spending-round-2019> (Section 1)

² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/833726/landscapes-review-final-report.pdf (page 22)

- 2.4 The Conservative and Unionist Party manifesto for 2019 General Election stated that: “We welcome the Glover review and will create new national parks and Areas of Outstanding natural Beauty; as well as making our most loved landscapes greener, happier, healthier and open to all”.³
- 2.5 It is on the basis of these public messages from Government, and in the absence of any other formal indication of NPG, that we have assumed that NPG for 2020/21 will be increased by at least 1.72%. The figure of 1.72% reflects the increase that we received, per annum, for the last Spending Review period (2015/16 to 2019/20). A 1.72% increase in NPG for 2020/21 would still be a further potential real terms cut in our core funding, as we have assumed that the local government pay award will be at least 2%.
- 2.6 The reality of our funding position is that:
- In 9 of the last 10 years we have seen real term reductions in our core funding on an annual basis.
 - The cumulative impact is that, in real terms, our core income has reduced by over 40 per cent since 2010/11
- 2.7 We have sought to mitigate these reductions by seeking to diversify our income base through other forms of external grant income, voluntary donations, sales, fees and charges. We have been successful (especially with external grants) but the harsh reality is that this success is no substitute for sustained core funding, which is essential to support delivery of our statutory purposes and facilitate the preparation external funding bids which take staff time to prepare and which require match funding.
- 2.8 If inflation protection is not passed on to National Park Authorities then we will have to find savings in year by reducing our work programmes and there is a real risk that we will not be able to deliver against the priorities identified in the draft Business Plan which, in turn reflect Government priorities as expressed in the 25 Year Environment Plan.
- 2.9 The current level of financial uncertainty makes it extremely difficult, if not impossible, to prepare a detailed and robust Medium Term Financial Plan (MTFP).

3 2020/21 Budget and Medium Term Financial Plan

- 3.1 The MTFP is a key feature of the Authority’s forward planning process and it is reviewed annually on a rolling three year basis. The MTFP is a key document for:
- Outlining the financial strategy for the continuance, improvement and development of the services provided;
 - Summarising the resources available (funding and staff capacity) for implementing Business Plan priorities and objectives; and
 - Providing an overview of the future financial position of the Authority

³ https://assets-global.website-files.com/5da42e2cae7ebd3f8bde353c/5dda924905da587992a064ba_Conservative%202019%20Manifesto.pdf

- 3.2 The financial planning process is guided by the Authority’s Business Plan Priorities, the actions in the National Park Management Plan – Your Dartmoor (pertinent to the Authority) and key Government policies such as the ‘25 Year Plan for the Environment’ and the ‘Eight Point Plan for England’s National Parks’. The Authority’s new three year Business Plan is also being presented to Members for approval today. The revenue budget and Business Plan priorities also reflect the vision and ambition outlined in the independent review of designated landscapes led by Julian Glover.
- 3.3 The MTFP can be found at Appendices 1 to 3 and provides details of the income and expenditure budgets for each service area for the next three financial years. The Authority does not build each annual budget on an incremental basis, choosing instead to zero-base each year. Assumptions used are:

- Pay Award: the single largest area of expenditure is staff salaries. An annual 2% increase in the staff salary bill has been assumed for all three of the MTFP (although the recent “employer offer” has been rejected by all of the three Trades Unions). An extra 1%, if awarded, would cost around £36,000; a provision for this is included within earmarked reserves
- Inflation and price increases: are only included after discussion with suppliers / service providers
- External grant income: only included if confirmed
- Fees and charges income: target budgets are estimated based on historical and trend data
- NPG: for planning purposes the MTFP assumes that funding continues to increase at the same rate as the previous three years (1.72%). This is a key assumption as NPG provides over 80% of our total income. A 1.72% increase is in real terms a cut, as it would not cover a 2% annual pay award (plus on-costs) and general price inflation.

- 3.4 It should be noted that all three years of the MTFP are in deficit even with an assumed increase of 1.72%. It is proposed that this budget gap is met from the Unallocated Match Funding and the Invest to Save Reserves.

NPG increased by 1.72% per annum	Deficit £
2020-2021	31,784
2021-2022	50,292
2022-2023	66,634
Total	148,710

- 3.5 If Defra does not approve annual uplift of 1.72% in each of the next three years, i.e. NPG remains flat at 2019/20 rate, the deficit (based on the current MTFP) would be:

No increase in NPG	Deficit £
2020-2021	96,822
2021-2022	183,034
2022-2023	267,464
Total	547,320

- 3.6 If increased core funding from Defra is not forthcoming this year, or through the Spending Review (or other sources) then we will need to take some tough decisions to adjust our work programmes in order to set an affordable and balanced budget in

future years. To make a call on Reserves for such significant amounts, over more than one year, is not sustainable. Similarly, as we have built the 2020/21 budget assuming a 1.72% increase, if this is not the case, a revised budget will have to be brought back to the Authority after the start of the financial year, so that Members can make decisions about how to rebalance the budget (and the MTFP).

- 3.7 The following table provides a summary of some of the most significant projects and income targets that have been included in the MTFP; some of which may become at risk if increased core funding is not forthcoming.

Projects and Programmes	2020/21 £	2021/22 £	2022/23 £
Holwell Tor Community Excavation Project			20,000
Monument Management Scheme Projects	21,000		
Eradication of Non-invasive Species	9,000		
Common Cause - national partnership project	10,000	10,000	10,000
Habitat Management	10,000		
Higher Uppacott barn cottage roof and cottage refurbishment		95,000	
Development Management IT system	50,000		
IT software			
Replace virtual server hosts	27,611		
Replacement desktops/laptops	6,750		
Access: miles without stiles, infrastructure and erosion repairs	11,000 10,000	15,000 10,000	10,000 10,000
Vehicle purchases: CWT and Rangers	50,000		
Parke House maintenance programme	14,800	10,000	10,000
Duchy Hotel maintenance programme	7,000	15,000	18,000
Visitor Centres - improvements	5,000	2,000	
Visitor Survey	5,300		
Car park maintenance & running costs	106,140	70,140	93,500
Car parking income	(75,000)	(75,000)	(75,000)
EV charging point - Princetown	8,000		
Local Plan Review Programme	55,000	28,000	10,000
Visitor Centres retail stock procurement	133,000	139,000	145,000
Visitor Centres sales income	(192,000)	(220,000)	(230,000)
Donate for Dartmoor (target not budget)	(30,000)	(30,000)	(30,000)

- 3.8 Financial provision (£16,000) for the National Park Management Plan process is held in an earmarked reserve, due to uncertainty around the amount and timing of spend.

- 3.9 The Authority has in the past taken on up to three apprentices each year; the 2020/21 budget contains the final year of just one apprenticeship; financial uncertainty and lack of capacity to properly manage and mentor apprentices is disappointing.

- 3.10 Members' attention is also specifically drawn to the following projects:

- (i) The Hill Farm Project is currently in the final year of agreed funding from the Prince's Countryside Fund, Heritage Lottery Fund and Duchy of Cornwall worth £130,197. Beyond March 2021 external funding for this project is not confirmed. The Authority is committing to support a three year post to help secure the future

of the Project and help the farming community transition to a new Environmental Land Management Scheme (ELMS), which is a key priority in the Authority's Business Plan.

- (ii) We previously secured external funding for Our Common Cause, a national partnership project, being led by the Foundation for Common Land with funding from the Heritage Lottery Fund. A second bid, to pull down further funding to expand this project for a further three years, has been submitted.
- (iii) An extended Parishscapes Programme using New Homes Bonus receipts. South Hams District Council, West Devon Borough Council and Teignbridge District Council have transferred an agreed proportion of the New Homes Bonus Grant attributable to new housing development in the National Park, to the Authority. We have agreed, with these Councils, that this money will be used as potential match-funding for a bid to the National Lottery Heritage Fund for a project aimed at supporting community engagement in local heritage (natural and built).
- (iv) The Authority is a delivery partner in the Defra funded South West Peatlands Project being led by South West Water which commenced in 2018/19. On Dartmoor, a programme of restoration is underway with a budget of approximately £1.8m being funded by: a capital grant of approximately £1.5m from Defra; and grants or contributions and in kind support from local partners including the Authority. The Authority set aside £150,000 in 2018/19 to support this project, which includes a full time Project Officer post.
- (v) The Authority is also a delivery partner for the Dartmoor Headwaters Project, which is being led by the Environment Agency (EA) to trial the delivery of natural flood risk management interventions. A budget of £260,000 has been secured from Defra via the EA, matched by DNPA in kind support (to the value of £36,000) for a 3 year project ending in March 2021. The Authority is hosting the employment of the Project Officer and is recharging all costs to the EA.
- (vi) In November 2017 we were invited to submit ideas to Defra for the proposed Environmental Land Management System. After much delay and further work to meet Defra funding requirements we were awarded a grant of £201,080 in December 2019. The Dartmoor Environmental Land Management Test and Trial has now commenced and will run for 18 months. It provides an exciting opportunity to work with the farming and land management community on developing proposals for the Government's Environmental Land Management System. It should be noted that this Test and Trial will not fund practical work.

3.11 In recent years the Authority has operated a Project Fund as part of its Revenue Budget. This Fund has enabled us to: buy-in additional support and capacity; to match-fund new projects; and to invest in new equipment during the financial year. This strategy has helped to provide flexibility and agility and it is therefore proposed that we continue with this approach for the life of the new MTFP. The amount allocated to the Project Fund for each year is summarised below:

Project Fund	£
2020/21*	100,000
2021/22	75,000
2022/23	75,000

*An extra amount has been included in 2020/21 for the replacement of PACS, the Development Management IT system. Subject to a full business case being brought forward, it is likely that a replacement system will be procured this year, and could take up at least half of the 2020/21 Project Fund balance.

- 3.12 The financial context for 2020/21 and beyond is particularly challenging, especially due to the lack of clarity about NPG. In building this MTFP, Leadership Team has had to make some hard decisions about which work programmes could realistically be supported. A list of project bids that have not been successful or been reduced can be found at appendix 4. Some of these are at an 'ideas in progress' stage and these will be kept on the back burner or worked up further if capacity is available. This provides us with a useful planning tool to help guide: future Business Plan priorities; future financial strategy; and future work programmes.
- 3.13 Other budget pressures includes our desire to implement actions set out in our Climate Action Plan. Given current financial uncertainty we are recommending that priority actions in the draft Climate Action Plan are funded from the balance of the £50,000 held in reserves, that Members authorised for expenditure to support our climate change ambitions. Expenditure above this will be subject to a further report to Authority.
- 3.14 The triennial valuation of the Local Government Pension Fund took place this year and the provisional results indicate that the Authority's funding level has improved from 90% in 2016 to 97.8% at 31 March 2019. In 2016 the Authority made a £0.5 million one-off contribution to the Pension Fund as an "invest-to-save" initiative. The aim being to potentially make long term cash savings over the 17 year deficit recovery period and to try to protect future revenue budgets against significant pension cost rises. An employer contribution target rate was subsequently set by the Actuary at 19% of pensionable pay, rather than 21%. This strategy is proving successful as borne out by the improved funding level in the 2019 valuation and the fact that the employer contribution rate can be maintained at the same level, even though the value of our liabilities has increased:
- The annual primary (future) contribution rate has increased from 15.2% to 17.4%;
 - The secondary (deficit) contribution rate has fallen from £272,590 to £108,959 (over a 3 year period).

4 Reserves

- 4.1 In 2010/11 the Audit & Governance Committee, at the request of the Authority, undertook work to formulate a risk based approach to determining the level and use of reserves required by the Authority. The outcome of that work was an agreed methodology (NPA/AG/10/014) which has been applied to determine the level of reserves held, on an annual basis.
- 4.2 Our reserve balances are regularly reviewed and are made up as follows:
- General Reserve (unallocated) - a contingency balance for emergency situations and is the minimum level that we have determined will always be maintained (and is in accordance with CIPFA guidance);
 - Contingency Reserves (allocated) - provisions set aside using a risk based analysis to cushion the impact of uneven cash flows, and unexpected events

where the timing of and / or amounts are uncertain (e.g. pay awards, pension contributions, loss of income);

- Earmarked Reserves (allocated) - consisting of ring-fenced grants and contributions received from third parties, sums set aside for capital schemes, commitments against future contracts and agreements and our external funding allocations where we are working in partnership with others.

4.3 The Risk Based analysis can be found at Appendix 5 and is at a summary level. Appendix 6 shows the likely General Fund Reserve Balances for the MTFP period at a detailed level. It can therefore be seen that the majority of our Reserve Balances are “allocated”. The following table is a summary of how reserves are currently being allocated in each year of the MTFP (based on an assumed increase in NPG) the detail of which can see found at Appendix 6:

Earmarked Reserves	2019/20 £	2020/21 £	2021/22 £	2022/23 £
Opening Balance	2,233,565	1,691,083	1,145,165	1,032,546
Movements	(542,482)	(545,919)	(112,618)	(66,634)
Closing Balance	1,691,083	1,145,164	1,032,546	965,912
General Reserve	500,000	500,000	500,000	500,000

- 4.4 Section 3.4 of this report sets out the overall budget deficit for the MTFP if NPG is increased by 1.72%. If NPG is not increased the MTFP will have to be revised. At the time of writing this report, NPG had still not been confirmed by Defra.
- 4.5 It can be seen that our Earmarked Reserve balances will be reduced by almost 43% at the end of this MTFP period based on current assumptions and scenario planning.
- 4.6 The General (unallocated) Reserve balance was increased to £500,000 last year, in order to maintain this reserve at approximately 12% of the net budget or circa three months’ worth of salary bill (for going concern purposes).

5 Capital Strategy and Prudential Indicators

- 5.1 As part of the annual budgeting process the Authority is required to produce an affordable Medium Term Capital Programme (MTCP) alongside its revenue budget, if relevant. There is also the requirement to produce a Capital Strategy in line with the CIPFA Prudential Code for Capital Finance in Local Authorities 2017. The Prudential Code is a professional code of practice to support local authorities when taking capital investment (fixed asset) decisions. The objectives are to ensure, within a clear framework, that capital investment plans are affordable, prudent and sustainable and that treasury management decisions are taken in accordance with good professional practice. A Treasury Management & Investment Strategy report is also being presented for approval today.
- 5.2 The obligation to have a Capital Strategy has arisen, as some authorities have become increasingly willing to invest significant amounts in commercial developments, in order to generate returns that will offset some of the financial impact of austerity.

- 5.3 This Authority rarely has a Capital Programme or the need for significant investment in physical assets in the same way as local authorities, who have responsibility for highways or housing. Capital spend for this Authority is commonly of a small scale nature such as related to vehicles or IT. For larger schemes such as new buildings or conversions, Members receive specific reports to support decision making; which provides background, the reasons why the scheme is being recommended and a cost benefit analysis; and will identify sources of finance. In advance of the report being presented to the Authority, Leadership Team will have scrutinised the proposed scheme.
- 5.4 The Authority historically has a low risk attitude toward capital investment; having never borrowed internally or externally to fund capital schemes; entered into long-term liabilities such as Private Finance Initiatives; nor invested for commercial purposes. Capital investment decisions are made to support National Park Purposes only.
- 5.5 We seek external contributions towards supporting our capital spend wherever possible. If capital receipts (sale of assets) become available, these must be used to finance capital spend. In the absence of both these, revenue income (via NPG or fees and charges) or revenue reserves are used to fund capital expenditure.
- 5.6 Stewardship of our assets is led by Leadership Team and delivered by various officers within the Authority; the portfolio is small. Assets are kept under review to assess their ability to deliver or support National Park Purposes, to identify and manage future liabilities and identify opportunities for disposal. Built assets are subject to regular condition assessments and have a repair and redecoration programme that is built into the MTFP.
- 5.7 The Authority's capital programme for the MTFP period currently consists of:

Capital Scheme/ Project	2020/21 £	2021/22 £	2022/23 £
Replacement Vehicles (Rangers and CWT)	50,000	0	0
Replacement of the Development Management IT system	50,000	0	0
Higher Uppacott cottage roof and internal refurbishment	0	40,000 55,000	0
Postbridge Visitor Centre - extension	171,581	11,999	0

Funded From	£	£	£
National Park Grant or Revenue Reserves	83,000	95,000	0
Capital Receipts	17,000	0	0
Rural Development Programme England	171,581	11,999	0

Further Capital Projects could be brought forward from the Climate Change Action Plan, subject to submission of a business case and the allocation of required funding.

- 5.8 The Authority has been successful in applying for 100% capital grant from the Rural Development Programme England (RDPE) to fund an extension to the Postbridge Visitor Centre (NPA/18/017). The capital cost to build the extension is £479,948. The build has commenced and is currently ahead of schedule, re-opening is scheduled for July 2020 and final grant monies (for the retention) will be received in 2022.

- 5.9 As the Authority has no “proper” external borrowing, the other prudential indicators do not normally apply. However, due to the implementation of *“International Financial Reporting Standard 16 - Leasing”* from 1 April 2020, the Authority will have external borrowing in relation to leasing contracts that it currently holds or enters into in the future (for property, plant and equipment). All previously held *“operating leases”* unless of low value or of less than 12 months duration, will become *“finance leases”*. This has the *“accounting”* effect of bringing lease liabilities onto the balance sheet, which counts as *“debt”* as far as the *Prudential Code* is concerned.
- 5.10 However, as this *“debt”* relates to transactions that the Authority has already entered into this will be purely an administrative task of increasing (or originating) *Prudential Code Indicator limits* equal to the newly recognised *“debt”*. The *“indicators and limits”* will just describe what has already happened, rather than providing any control. Preparatory is now being undertaken to confirm the number of leases held, the potential impact of valuation of assets and liabilities and therefore the impact on the balance sheet and revenue account.
- 5.11 As we will be bringing these historical liabilities onto the Balance Sheet, we will have to undertake work to ascertain what the figures are so that they can be reflected in the prudential indicators for 2020/21 and beyond. However it has not been possible to achieve this for the start of the 2020/21 financial year (during budget setting) and so Members will be updated later in the new financial year when reliable figures will be available for historical leases. If a new lease is entered into, the indicators can be calculated at the inception of the lease.
- 5.12 If sources of additional capital income become available during the year, for example via additional grants , external contributions or capital receipts, or if any other business decisions are proposed that will result in a change to the Capital Programme or the Prudential Indicators, the Authority will be presented with a business case for approval.

6 Risk Analysis and Financial Strategy

- 6.1 It should be noted that the 2020/21 budget is normally the most robust and accurate financial plan of the three year period; it is inevitable that future years’ financial plans can change for all sorts of reasons and influences, internal and external. However, as, at the time of writing, NPG has not been confirmed for 2020/21 (and beyond) there is a degree of uncertainty and there is a risk that the 2020/21 budget may have to be re-visited between now and 1 April. The Authority continues to actively manage its financial and non-financial risks and therefore makes allowances for them by promoting a culture of flexibility and agility to militate against threats, to be proactive and to embrace opportunities as they arise. Due to the current uncertainty, spending in quarter 4 of 2019/20 is being even more tightly controlled.
- 6.2 The budget and MTFP contains a number of assumptions that may or may not prove to be accurate. In addition, events may occur that have the potential to affect the Authority’s underlying finances. We must therefore consider and provide for ongoing risks and uncertainties such as:

Risk	Likelihood	Impact	Mitigating Factors
NPG is not as high as anticipated	High	High	Level of reserves held. NPG has not yet been notified and the Financial Grant Agreement will have to be re-issued and signed before 31 March. Budgets may have to be revised before or at 1 April
Pay awards higher than anticipated	Medium	High	Annual review of MTFP. A 1% increase is circa £36k. Provision (short term) made in reserves. Some notice will be provided which will enable a timely response.
Liabilities related to property estate (including car parks)	Medium	Medium	A contingency fund established in reserves. On-going maintenance programme and not all property costs need to be met immediately.
Pensions valuation may increase costs	Low	Medium	Previous investment by the Authority to contain future costs. 2019 valuation indicates stable costs for next three years and funding position at 97.8%. But reliant on investment returns, demographic changes and other changes in financial and non-financial assumptions
Economic situation could deteriorate & impact on self-generated income and costs. Income generation targets prove unrealistic	Medium	Low	MTFP constructed on 3 year timescale with annual review. Budgetary control arrangements in place to monitor income and expenditure. Reserve provision (short-term) made to manage immediate pressures. External income from fees and charges remains a small proportion of total income
Contributions from Devon County Council for maintenance of Public Rights of Way may be reduced	Medium	Medium	Subject to annual review, any reduction in income will be projected and reflected in the MTFP
External grant income reduced	High	Medium	We have an active programme of developing new project ideas but external funding sources are extremely competitive and we are unclear as to what will replace the Rural Development Programme.

6.3 The Authority continues to seek out new ways and ideas to generate additional revenue and diversify income streams; some of which are described below.

- 6.4 In 2016 we launched the Donate for Dartmoor campaign. The table below shows donations received (to date) and how those donations have been spent or are being allocated in 2019/20; the final balance, which will not be known until year end, will be allocated to projects aimed at improving the access network for all to use and enjoy.

	£
2016/17 Donations and Mend our Mountains	(19,994)
Nuns Cross Path and new footbridge across the River Teign on the Two Moors Way in 2016/17 & 2017/18	19,994
2017/18 Donations	(18,295)
Buckfastleigh Path project in 2018/19	15,000
Southern damselfly monitoring project in 2018/19	1,500
2018/19 Donations	(22,084)
Amicombe path repairs in 2018/19	5,000
Southern damselfly monitoring project in 2019/20	2,000
Survey and repair of Historic features in 2019/20	5,550
Path Network improvements in 2019/20	11,329
2019/20 Donations (at End Feb 2020)	(25,825)
Nuns Cross Path in 2019/20	1,670
Lambsdowen public right of way in 2019/20	3,000
Southern damselfly monitoring project in 2020/21	2,000
Archaeology minor works projects in 2020/21	8,000
Access: Miles without stiles in 2020/21	5,000
Longtimber wood pathway improvements in 2020/21	2,000
Balance (unallocated at time of writing)	(4,155)

- 6.5 In 2017 we undertook a public arts initiative called “Moor Otters”. The aim was to engage the public, support the local economy, promote positive key messages and generate an income to support key projects. The initiative was a huge success generating a £60,000 surplus which was allocated to three projects: Junior Ranger Programmes, Erosion repairs and eradication of non-native invasive species. During 2019/20 Members approved plans to run a second version of this project (NPA/19/015) and set aside £120,000 from reserves to pump prime it. The arts trail will run through the summer of 2020, culminating in an auction to sell off the otters.
- 6.6 In 2018 we introduced car parking charges as at Haytor, Postbridge and Meldon (at Princetown in 2013). The charges (not changed since 2013) replace the previous system of voluntary donations and we have promoted it as ‘pay and conserve/pay and enjoy’ rather than ‘pay and display’. Income from car park charges is used to fund car park maintenance and repairs, the costs of which are increasingly significant. The Audit and Governance Committee considered all of our fees and charges at their meeting in February and have recommended that parking charges be increased (see the separate report on this agenda). This has been incorporated into the MTFP.
- 6.7 The Authority’s cost base is increasing at a faster rate than its underlying funding and there are one-off and ongoing costs that need to be met. A MTFP has been produced bringing together sensible assumptions over the future direction of income and expenses. However, the reality will inevitably be different and we need to be prepared for less favourable scenarios. In particular NPG may not increase and could potentially be cut through the Comprehensive Spending Review; the Pension Fund revaluation occurs every three years and can result in increased costs; staff costs could continue

to rise; the Trade Union bodies have recently rejected the employer pay award offer of 2% for 2020/21.

7 Equality & Sustainability Impact

- 7.1 Consideration is given when deciding which areas of expenditure should be supported of the impact on under-represented groups, and the need to promote equal opportunities both as an employer and in respect of the services provided. The recently Climate and Environmental Emergency declaration does feature within the MTFP (see also the separate report on this agenda); however our ability to deliver significant projects could be hampered due to lack of resources (funding).

8 Conclusions

- 8.1 The 2020/21 budget is less robust than in previous years because of the uncertainty over National Park Grant for 2020/21 and beyond. Indeed, accurate financial planning and budgeting is impossible given the current uncertainty.
- 8.2 Clause 25 of part 2 of the Local Government Act 2003 requires the Chief Financial Officer (section 151 Officer) to report to Members, when calculating the net budget requirement, on the robustness of estimates made including the overall public sector financing climate. The 2020/21 budget is less robust than in previous years because of the uncertainty over National Park Grant for 2020/21 and beyond. Indeed, accurate financial planning and budgeting is impossible given the current level of uncertainty. I therefore must confirm that I do have some concern about the robustness of this MTFP; that reserves balances may have to be depleted at a faster rate than in previous years; and to that end we are exercising a degree of prudence with our revenue spending in the final quarter of 2019/20.
- 8.3 We have assumed a 1.72% increase in NPG for 2020/21. We believe this to be a cautious assumption given that senior politicians had publicly cited that 'austerity had ended' and Defra received a 3.3% real-terms increase in its revenue budget. A 1.72% increase in NPG would not even offer real-terms protection if the local government pay award is in excess of this amount. A continued period of austerity will threaten our ability to deliver National Park purposes, contribute to the targets in the 25 Year Environment Plan, meet our publicly stated objectives around climate change and also potentially question the Government's commitment to the Glover Landscapes Review.

DONNA HEALY

Attachments: Appendices 1, 2 & 3 – 2020/21, 2021/22 & 2022/23 Revenue Budgets
Appendix 4 – Budget bid cuts and reductions
Appendix 5 – Reserves risk based analysis
Appendix 6 – Reserve balances

20200306 DH 2020/21 Budget & MTFP

Appendix 1 to NPA/20/005

BUDGET 2020/21	Salaries	Travel	Transport	Premises	Projects: Supplies & Services	GROSS EXPENDITURE	Grants	Treasury	Fees & Charges	Sales	Rents & Other	INCOME	NET EXPENDITURE
	£	£	£	£	£	£	£	£	£	£	£	£	£
ENVIRONMENTAL LAND MANAGEMENT	28,162					28,162	(28,162)					(28,162)	0
BIO-DIVERSITY	81,902	1,400			51,933	135,235						0	135,235
LAND MANAGEMENT	65,031	600			27,240	92,871			(176)			(176)	92,695
WOODLANDS	41,463	300			1,800	43,563						0	43,563
PEATLANDS	40,350	1,200			395	41,945						0	41,945
DARTMOOR HEADWATERS PROJECT	39,164					39,164	(39,164)					(39,164)	0
HILL FARM PROJECT	50,829					50,829	(35,688)					(35,688)	15,141
NATURAL ENVIRONMENT	346,901	3,500	0	0	81,368	431,769	(103,014)	0	(176)	0	0	(103,190)	328,579
ARCHAEOLOGY	122,068	2,200			42,810	167,078	(48,740)		(3,500)			(52,240)	114,838
BUILT ENVIRONMENT	39,104	350				39,454						0	39,454
UPPACOTT				15,500		15,500					0	0	15,500
CULTURAL HERITAGE	161,172	2,550	0	15,500	42,810	222,032	(48,740)	0	(3,500)	0	0	(52,240)	169,792
VISITOR FACILITIES	71,475	500	4,705	14,376	145,423	236,479			(104,880)			(104,880)	131,599
ACCESS & RECREATION	83,830	950			41,540	126,320						0	126,320
PROW	103,086				57,261	160,347	(43,000)					(43,000)	117,347
SUSTAINABLE TOURISM & TRANSPORT	10,317	700			8,124	19,141						0	19,141
RECREATION MANAGEMENT	268,708	2,150	4,705	14,376	252,348	542,287	(43,000)	0	(104,880)	0	0	(147,880)	394,407
VISITOR CENTRES	247,067	1,900		22,265	160,965	432,197			(750)	(192,000)		(192,750)	239,447
COMMUNICATIONS	179,866	1,600			52,951	234,417			(29,000)			(29,000)	205,417
NATURALLY HEALTHY DARTMOOR					1,000	1,000						0	1,000
EDUCATION	204,793	1,350	6,618		22,970	235,731			(4,675)			(4,675)	231,056
PROMOTING UNDERSTANDING	631,726	4,850	6,618	22,265	237,886	903,345	0	0	(34,425)	(192,000)	0	(226,425)	676,920
RANGERS	395,232	100	64,050	3,671	21,676	484,729						0	484,729
CONSERVATION WORKS SERVICE	129,516	0	31,200	13,267	9,050	183,033						0	183,033
RANGERS, ESTATES & VOLUNTEERS	524,748	100	95,250	16,938	30,726	667,762	0	0	0	0	0	0	667,762
DEVELOPMENT MANAGEMENT	471,212	4,900			42,707	518,819	0		(192,000)			(192,000)	326,819
DEVELOPMENT MANAGEMENT	471,212	4,900	0	0	42,707	518,819	0	0	(192,000)	0	0	(192,000)	326,819
FORWARD PLANNING & COMMUNITY	196,844	1,000			68,900	266,744	0					0	266,744
FORWARD PLANNING	196,844	1,000	0	0	68,900	266,744	0	0	0	0	0	0	266,744
CORPORATE CENTRE	206,302	11,500			134,153	351,955		(8,000)				(8,000)	343,955
CORPORATE & DEMOCRATIC CORE	206,302	11,500	0	0	134,153	351,955	0	(8,000)	0	0	0	(8,000)	343,955
INFORMATION TECHNOLOGY	148,819	1,600			63,504	213,923			(2,225)			(2,225)	211,698
CORPORATE OPERATING COSTS			10,740		114,095	124,835						0	124,835
ADMINISTRATION AND FINANCE	205,323				10,868	216,191						0	216,191
LEGAL					60,000	60,000						0	60,000
HUMAN RESOURCES	112,739	930			50,968	164,637						0	164,637
OFFICE ACCOMMODATION (PARKE)	14,081			93,089		107,170						0	107,170
OFFICE ACCOMMODATION (PRINCETOWN)				49,331		49,331					(21,070)	(21,070)	28,261
CORPORATE SERVICES	480,962	2,530	10,740	142,420	299,435	936,087	0	0	(2,225)	0	(21,070)	(23,295)	912,792
PROJECT FUND					100,000	100,000						0	100,000
OTHER	0	0	0	0	100,000	100,000	0	0	0	0	0	0	100,000
TOTAL	3,288,575	33,080	117,313	211,499	1,290,333	4,940,800	(194,754)	(8,000)	(337,206)	(192,000)	(21,070)	(753,030)	4,187,770

Summary:

Gross Expenditure	4,940,800
Reserves	(265,081)
Income	(753,030)
Net Budget	<u>3,922,689</u>
National Park Grant	(3,890,905)
Deficit / (Surplus)	<u>31,784</u>

BUDGET 2021/22	Salaries	Travel	Transport	Premises	Projects: Supplies & Services	GROSS EXPENDITURE	Grants	Treasury	Fees & Charges	Sales	Rents & Other	INCOME	NET EXPENDITURE
	£	£	£	£	£	£	£	£	£	£	£	£	£
ENVIRONMENTAL LAND MANAGEMENT	18,798					18,798	(18,798)					(18,798)	0
BIO-DIVERSITY	84,980	1,400			19,285	105,665						0	105,665
LAND MANAGEMENT	66,964	600			15,947	83,511			(176)			(176)	83,335
WOODLANDS	42,344	300			6,800	49,444						0	49,444
PEATLANDS	9,767	500			395	10,662						0	10,662
HILL FARM PROJECT	52,273					52,273	(36,731)					(36,731)	15,542
NATURAL ENVIRONMENT	275,126	2,800	0	0	42,427	320,353	(55,529)	0	(176)	0	0	(55,705)	264,648
ARCHAEOLOGY	121,016	2,200			13,451	136,667	(27,242)		(3,500)			(30,742)	105,925
BUILT ENVIRONMENT	41,146	350				41,496						0	41,496
UPPACOTT				109,460		109,460					0	0	109,460
CULTURAL HERITAGE	162,162	2,550	0	109,460	13,451	287,623	(27,242)	0	(3,500)	0	0	(30,742)	256,881
VISITOR FACILITIES	74,488	500	4,705	13,751	127,332	220,776			(105,147)			(105,147)	115,629
ACCESS & RECREATION	87,136	950			44,840	132,926						0	132,926
PROW	105,606				61,756	167,362	(43,000)					(43,000)	124,362
SUSTAINABLE TOURISM & TRANSPORT	10,802	700			8,515	20,017			(500)			(500)	19,517
RECREATION MANAGEMENT	278,032	2,150	4,705	13,751	242,443	541,081	(43,000)	0	(105,647)	0	0	(148,647)	392,434
VISITOR CENTRES	270,579	1,900		18,941	160,977	452,397			(750)	(220,000)		(220,750)	231,647
COMMUNICATIONS	185,855	1,600			52,247	239,702			(30,000)			(30,000)	209,702
NATURALLY HEALTHY DARTMOOR					1,000	1,000						0	1,000
EDUCATION	209,263	1,350	1,718		22,375	234,706			(4,625)			(4,625)	230,081
PROMOTING UNDERSTANDING	665,697	4,850	1,718	18,941	236,599	927,805	0	0	(35,375)	(220,000)	0	(255,375)	672,430
RANGERS	404,960	100	31,550	3,179	24,641	464,430						0	464,430
CONSERVATION WORKS SERVICE	108,337		14,200	17,805	11,150	151,492						0	151,492
RANGERS, ESTATES & VOLUNTEERS	513,297	100	45,750	20,984	35,791	615,922	0	0	0	0	0	0	615,922
DEVELOPMENT MANAGEMENT	479,809	4,900			45,096	529,805	0		(192,000)			(192,000)	337,805
DEVELOPMENT MANAGEMENT	479,809	4,900	0	0	45,096	529,805	0	0	(192,000)	0	0	(192,000)	337,805
FORWARD PLANNING & COMMUNITY	165,310	1,000			36,500	202,810	0					0	202,810
FORWARD PLANNING	165,310	1,000	0	0	36,500	202,810	0	0	0	0	0	0	202,810
CORPORATE CENTRE	210,561	8,000			136,061	354,622		(8,000)				(8,000)	346,622
CORPORATE & DEMOCRATIC CORE	210,561	8,000	0	0	136,061	354,622	0	(8,000)	0	0	0	(8,000)	346,622
INFORMATION TECHNOLOGY	153,133	1,600			26,761	181,494			(2,725)			(2,725)	178,769
CORPORATE OPERATING COSTS			10,740		112,929	123,669						0	123,669
ADMINISTRATION AND FINANCE	212,396				10,980	223,376						0	223,376
LEGAL					60,000	60,000						0	60,000
HUMAN RESOURCES	115,773	930			51,512	168,215						0	168,215
OFFICE ACCOMMODATION (PARKE)	14,389			90,016		104,405						0	104,405
OFFICE ACCOMMODATION (PRINCETOWN)				60,489		60,489					(21,570)	(21,570)	38,919
CORPORATE SERVICES	495,691	2,530	10,740	150,505	262,182	921,648	0	0	(2,725)	0	(21,570)	(24,295)	897,353
PROJECT FUND					75,000	75,000						0	75,000
OTHER	0	0	0	0	75,000	75,000	0	0	0	0	0	0	75,000
TOTAL	3,245,685	28,880	62,913	313,641	1,125,550	4,776,669	(125,771)	(8,000)	(339,423)	(220,000)	(21,570)	(714,764)	4,061,905

Summary:	
Gross Expenditure	4,776,669
Reserves	(53,006)
Income	(714,764)
Net Budget	4,008,899
National Park Grant	(3,958,607)
Deficit / (Surplus)	50,292

Appendix 3 to NPA/20/005

BUDGET 2022/23	Salaries	Travel	Transport	Premises	Projects: Supplies & Services	GROSS EXPENDITURE	Grants	Treasury	Fees & Charges	Sales	Rents & Other	INCOME	NET EXPENDITURE
	£	£	£	£	£	£	£	£	£	£	£	£	£
BIO-DIVERSITY	88,128	1,400			19,785	109,313						0	109,313
LAND MANAGEMENT	69,287	500			15,947	85,734			(176)			(176)	85,558
WOODLANDS	43,214	300			7,100	50,614						0	50,614
HILL FARM PROJECT	20,067					20,067						0	20,067
NATURAL ENVIRONMENT	220,696	2,200	0	0	42,832	265,728	0	0	(176)	0	0	(176)	265,552
ARCHAEOLOGY	123,484	2,200			32,794	158,478			(3,500)			(3,500)	154,978
BUILT ENVIRONMENT	43,214	350				43,564						0	43,564
MTMTE						0						0	0
UPPACOTT				15,130		15,130					0	0	15,130
CULTURAL HERITAGE	166,698	2,550	0	15,130	32,794	217,172	0	0	(3,500)	0	0	(3,500)	213,672
VISITOR FACILITIES	77,169	500	4,705	14,126	153,633	250,133			(61,500)			(61,500)	188,633
ACCESS & RECREATION	89,429	950			39,350	129,729						0	129,729
PROW	108,220				61,972	170,192	(43,000)					(43,000)	127,192
SUSTAINABLE TOURISM & TRANSPORT	11,247	700			8,745	20,692			(500)			(500)	20,192
RECREATION MANAGEMENT	286,065	2,150	4,705	14,126	263,700	570,746	(43,000)	0	(62,000)	0	0	(105,000)	465,746
VISITOR CENTRES	277,004	1,800		19,138	162,055	459,997			(750)	(230,000)		(230,750)	229,247
COMMUNICATIONS	193,598	1,600			55,202	250,400			(31,000)			(31,000)	219,400
NATURALLY HEALTHY DARTMOOR					1,000	1,000						0	1,000
EDUCATION	213,538	1,350	1,718		21,350	237,956			(4,675)			(4,675)	233,281
PROMOTING UNDERSTANDING	684,140	4,750	1,718	19,138	239,607	949,353	0	0	(36,425)	(230,000)	0	(266,425)	682,928
RANGERS	415,061	100	31,550	3,187	24,620	474,518						0	474,518
CONSERVATION WORKS SERVICE	110,421		14,200	21,154	11,150	156,925						0	156,925
RANGERS, ESTATES & VOLUNTEERS	525,482	100	45,750	24,341	35,770	631,443	0	0	0	0	0	0	631,443
DEVELOPMENT MANAGEMENT	492,642	4,900			40,518	538,060	0		(192,000)			(192,000)	346,060
DEVELOPMENT MANAGEMENT	492,642	4,900	0	0	40,518	538,060	0	0	(192,000)	0	0	(192,000)	346,060
FORWARD PLANNING & COMMUNITY	105,341	1,000			17,000	123,341	0					0	123,341
FORWARD PLANNING	105,341	1,000	0	0	17,000	123,341	0	0	0	0	0	0	123,341
CORPORATE CENTRE	214,600	8,000			130,563	353,163		(8,000)				(8,000)	345,163
CORPORATE & DEMOCRATIC CORE	214,600	8,000	0	0	130,563	353,163	0	(8,000)	0	0	0	(8,000)	345,163
INFORMATION TECHNOLOGY	156,804	1,600			64,408	222,812			(2,225)			(2,225)	220,587
CORPORATE OPERATING COSTS			10,740		104,207	114,947						0	114,947
ADMINISTRATION AND FINANCE	218,164				11,190	229,354						0	229,354
LEGAL					60,000	60,000						0	60,000
HUMAN RESOURCES	118,481	800			52,017	171,298						0	171,298
OFFICE ACCOMMODATION (PARKE)	14,657			91,237		105,894						0	105,894
OFFICE ACCOMMODATION (PRINCETOWN)				64,414		64,414					(22,070)	(22,070)	42,344
CORPORATE SERVICES	508,106	2,400	10,740	155,651	291,822	968,719	0	0	(2,225)	0	(22,070)	(24,295)	944,424
PROJECT FUND					75,000	75,000						0	75,000
OTHER	0	0	0	0	75,000	75,000	0	0	0	0	0	0	75,000
TOTAL	3,203,770	28,050	62,913	228,386	1,169,606	4,692,725	(43,000)	(8,000)	(296,326)	(230,000)	(22,070)	(599,396)	4,093,329

Summary:	
Gross Expenditure	4,692,725
Reserves	
Income	(599,396)
Net Budget	4,093,329
National Park Grant	(4,026,695)
Deficit / (Surplus)	66,634

Budget Bid Reductions and Deletions			
Cost Centre	Description	Reduced by £	Deleted £
Access	Erosion Works	10,000	
Access	Training	1,300	
Archaeology	Holwell Tor Excavation Project		20,000
Biodiversity	Training	100	
Communications	Donate for Dartmoor promotion budget	1,000	
Communications	Brand development		500
Communications	Interpretation Boards	3,500	
Conservation Works Team	Hand tools replacement & equipment repairs	1,000	
Corporate	Replace video conf system		3,164
Education	Events	3,000	
Education	Education guides	1,000	
Forward Planning	Economic development		1,500
Human Resources	Team Dartmoor day	500	
Human Resources	HR team training	500	
Human Resources	OH & wellbeing initiatives	500	
Information Technology	Smartboard (interactive) meeting room		2,940
Information Technology	Tablets for Members		2,000
Property	Station Yard - replace soffits & fascias		5,000
Property	Parke - internal decorations		1,000
Property	Parke - path resurfacing		2,000
Property	Princetown - replacement fire system		9,400
Property	Princetown - new cairs for meeting room		1,400
Public rights of way	Longtimber woods pathways project	2,000	
Visitor Centres	Postbridge new furniture & IT (upstairs)		1,050
Visitor Centres	Training	750	
Visitor management	Grant to WDBC - Princetown toilets		1,000
Visitor management	Recycling/ litter	6,500	
Visitor management	Key campaigns	3,000	
Woodlands	Works on DNP land	4,000	
Totals		38,650	50,954

2020/21 RESERVES: RISK BASED ANALYSIS	Risk Level	Rate	2020/21 Opening Balance £'000
Grants & Contributions with Restrictions carried forward: Grants & Contributions with Restrictions	N/A	Actual	(377)
Employees: Maternity / Paternity Cover / Pay Awards	Medium	Est.	(52)
Costs & Awards: Appeals / Public Enquiries / Litigation	High	Est.	(250)
Loss of Income and / or Price Increases: Reduced Sales, Fees & Charges or Inflation cost	Low	Est	(35)
Capital Property: Repairs & Maintenance (sinking fund)	Medium	Est.	(200)
Vehicles: Provision for future replacement of vehicles (sinking fund)	N/A	Actual	(127)
Climate Change - Action Plan projects	N/A	Actual	(50)
Capital Receipts Unapplied	N/A	Actual	(25)
Known Commitments/Contracts Local Plan Review	N/A	Actual	(57)
National Park Management Plan	N/A	Est.	(16)
Match Funding Reserve Moor than Meets the Eye - Cash Flow	N/A	Actual	(125)
Greater Dartmoor LEAF 2015-2020	N/A	Actual	(7)
Moor Otters Project Surplus - allocated to projects	N/A	Actual	(9)
South West Peatland Partnership	N/A	Actual	(86)
Postbridge Visitor Centre - Extension Building Project	N/A	Actual	(53)
Public Arts Project - Moor Otters II	N/A	Actual	(60)
Unallocated fund balance	N/A	Actual	(13)
Revenue Budget Gap - 2020/21 to 2022/23	High	Actual	(149)
General Reserve - Minimum amount to cover unanticipated costs / emergencies	N/A	Actual	(500)
Total Reserve Balance			(2,191)

GENERAL FUND RESERVE BALANCES

Appendix 6 to NPA/20/005

GENERAL FUND RESERVE BALANCES	2019/20 Opening Balance	2019/20 In-year Movements	2019/20 Transfers from Revenue at Year end	2019/20 Forecast Closing Balance	2020/21 Forecast Movements	2021/22 Forecast Movements	2022/23 Forecast Movements	2022/23 Forecast Closing Balance	Notes
	£	£	£	£	£	£	£	£	
Grants & Contributions with Restrictions									
Hill Farm Project	(8,957)	8,957	(7,617)	(7,617)	7,617				0 Cash balances are carried forward at each year end as allocated to expenditure
English Heritage: White Horse Hill	(20,036)			(20,036)	20,036				0 To fund new Interpretation at Postbridge Visitor Centre
Communities Fund Grant prior years contributions	(50,429)	29,196	(59,370)	(80,603)	80,603				0 Parishscapes II and carry forward for new HF funding bid
DCLG - Neighbourhood Planning Grant	(10,000)			(10,000)				(10,000)	0 Ringfenced
DCLG - Unringfenced Grants	(104,667)	37,173	(15,000)	(82,494)	41,491	41,003			0 Ringfenced - Allocated to Planning Enabler post & other external planning support
Donate for Dartmoor Balances	(18,879)	18,879	(21,265)	(21,265)	19,452			(1,813)	0 Allocated to projects after year-end
Historic England -PALS Grant	(9,891)	7,050		(2,841)	2,841				0 To be used over 3 years
Volunteer Award Prize money	(1,000)	1,000		0					0 C/fwd from 2018/19
Police & Crime Commissioner Grant	(5,000)			(5,000)	5,000				0 C/fwd from 2018/19
Heritage England - Monument Management Scheme	(7,781)	7,781		0					0 C/fwd from 2018/19
Heritage England - Adopt a monument	(252)	252		0					0 C/fwd from 2018/19
Peatland Partnership	(4,477)	4,477		0					0 C/fwd from 2018/19
South West water - Invasives Species Project	(5,000)	5,000		0					0 C/fwd from 2018/19
Wouth West Water - Environmental Land Management Project	(27,500)			(27,500)	27,500				0 C/fwd from 2018/19
Environment Agency - Dartmoor Headwaters Project	(1,524)	1,524	(115,000)	(115,000)	115,000				0 Cash balances are carried forward at each year end as allocated to expenditure
Woodland Trust - Eco Skills			(5,000)	(5,000)	5,000				
Budget Management Fund - Provisions (risk based)									
Employees	(52,000)			(52,000)				(52,000)	See risk assessment for breakdown
Costs and Awards: Appeals/Public Enquiries/Litigation	(250,000)			(250,000)				(250,000)	See risk assessment for breakdown
Loss of Income and Inflation	(34,500)			(34,500)				(34,500)	See risk assessment for breakdown
Invest to Save and / or Generate Projects	(83,733)	50,000	33,733	0				0	
Climate Change /Emergency Declaration		(50,000)		(50,000)	50,000			0	NPA/19/020 - See Action Plan - timing not confirmed
2018/19 Revenue Outturn	(69,394)	69,394		0				0	
Budget Gap 2020/21 to 2022/23			(148,710)	(148,710)	31,784	50,292	66,634	0	Taken from the unallocated match funding and invest to save reserves
Capital Expenditure Fund									
Vehicles - Sinking Fund - Replacement	(127,321)			(127,321)	33,000			(94,321)	To be allocated in 2020/21 MTFP
Capital Receipts unapplied			(24,781)	(24,781)	17,000			(7,781)	Allocated to Vehicle replacement
Property - Sinking Fund - Repairs & Maintenance	(210,000)	10,000		(200,000)				(200,000)	
Known Commitments									
Local Plan Review	(81,905)	24,500		(57,405)	55,000			(2,405)	Built into the MTFP - may need to top up
Local Plan Review Contracts - work in progress	(7,000)	7,000		0				0	C/Fwds at year end
All Moor Butterflies NPA/15/037	(7,500)	7,500		0				0	3 year programme
Farming Year Films	(10,000)	10,000		0				0	C/Fwd from 2018/19
National Parl Management Plan	(16,000)			(16,000)	16,000			0	To be used as required during plan process
Car park repairs	(50,340)	50,340		0				0	C/Fwd from 2018/19
Customer Relationship Manager IT system	(10,000)	10,000		0				0	C/Fwd from 2018/19
Prow IT system	(6,549)	6,549		0				0	C/Fwd from 2018/19
Shelving	(1,354)	1,354		0				0	C/Fwd from 2018/19
Historic Farm Buildings Grant Scheme Support	(14,392)	14,392		0				0	C/Fwd from 2018/19. 2019/20 costs being met from revenue
Match Funding Reserve									
Moor Than Meets the Eye match funding - Postbridge VC	(100,000)	100,000		0				0	
Moor than Meets the Eye - Cash Flow	(300,000)	175,000		(125,000)	(145,000)			(270,000)	Based on project cash flow - retention and final claim in year 5
Greater Dartmoor LEAF 2015-2020	(13,800)	6,900		(6,900)	6,900			0	NPA/14/038 for 6 years 2015-2020
Discovering Dartmoor's Wild Stories	(22,288)	22,288		0				0	Match against HLF Funding - ends 2019
Moor Otters	(38,000)	29,000		(9,000)	9,000			0	Project Surplus to be allocated to 3 projects in 2018/19 & 2019/20
Discover England Fund - Make Great Memories	(750)	750		0				0	NPA18/003 all contributions paid from within revenue budget
SW Peatland Partnership - Project Balance	(150,000)	63,677		(86,323)	65,000	21,323		0	NPA17/041 - 3 year project
Postbridge Visitor Centre Building Project	(140,000)	87,305		(52,695)	52,695			0	NPA18/017 - Oct 2019-May 2020
Public Arts Project 2020		(60,000)		(60,000)	60,000			0	NPA/19/015 - risk that costs will not be covered by income
Unallocated fund balance	(161,346)	33,277	114,977	(13,092)	(30,000)			(43,092)	
Total Earmarked Reserves	(2,233,565)	790,515	(248,033)	(1,691,083)	545,919	112,618	66,634	(965,912)	
General Reserve (unallocated emergency reserve)	(500,000)			(500,000)				(500,000)	
Total General Fund Balance	(2,733,565)	790,515	(248,033)	(2,191,083)	545,919	112,618	66,634	(1,465,912)	

DARTMOOR NATIONAL PARK AUTHORITY

6 March 2020

2020-2021 DRAFT BUSINESS PLANReport of the Chief Executive (National Park Officer) and the Director of Conservation and Communities

Recommendation: **That Members review the draft business plan for 2020/21 and delegate authority to the Chief Executive (National Park Officer), in consultation with the Chair of the Authority, to agree the final version.**

1 Background

- 1.1 The Business Plan is a strategic document and as such does not seek to describe everything that we do, rather it seeks to:
- Explain the vision for the Authority and outline the way we will work to achieve National Park purposes;
 - Identify the core values which will guide our work;
 - Set out the Authority's strategic priorities and the key actions to achieve these;
 - Detail the funding available to deliver the Business Plan.
- 1.2 It also provides a link between the National Park Management Plan, individual work programmes and staff appraisals. The review of the Management Plan is currently out for public consultation and although the final plan will not be adopted until part-way through 2020, the direction of travel is clear and we have therefore reflected the vision and emerging priorities in this draft Business Plan.
- 1.3 The draft Business Plan focuses on 2020/21 but identifies where actions/ programmes will continue beyond 2020/21 and, therefore, links to the Medium Term Financial Plan as well as the detailed revenue budget for 2020/21) (see NPA/20/005).
- 1.4 The national policy context for the draft Business Plan is provided by documents such as the Government's plan for the environment ([A Green future: Our 25 Year Plan to improve the Environment](#)); the [Eight Point Plan for National Parks](#) and its [Industrial Strategy](#) and productivity agenda. The Business Plan identifies the links to the Environment Plan, the findings of the Glover Review and Climate Emergency. With specific reference to the Glover Review, the draft Business Plan shares the ambition of being 'a positive force for the nation's wellbeing' and enhancing the National Park for people and nature.

2 Priorities for 2020/21

- 2.1 Members discussed priorities for 2020/21 and beyond at a workshop in September 2019. In no particular order they are:

- Adapting to and mitigating against climate change - particularly peatland restoration;
- Conservation and enhancement of the natural and historic environment;
- Work to support sustainable farming systems;
- Managing future visitors, to provide a quality experience and protect the National Park;
- Engaging with wider audiences (visitors and local residents), particularly young people;
- Work towards ensuring Dartmoor has a thriving local economy;
- Improve support to and engagement with local communities;
- Be an excellent organisation and, particularly, working to a carbon neutral Authority, seeking external funding and promoting the work we do.

2.2 The draft Business Plan (see Appendix 1) also sets out the way we will work. We have presented actions under three themes which reflect the new vision, our overall goal is to work in an integrated way (often with partners) to ensure that each work area or priority action considers and delivers across all themes and works towards carbon neutrality.

2.3 The draft Business Plan identifies key actions to help deliver the priorities identified by Members:

- **Engaging young people** - The next generation manifesto will engage young people in helping to deliver the Plan and things that are important to them. The new outreach and engagement strategy will have a focus on reaching out to young people and we will continue our Young Rangers offer which builds on Ranger Ralph and the award winning Junior Rangers programme;
- **Future direction of agriculture policy** – A number of the key actions contained in the draft Business Plan are aimed at helping to shape a future Environmental Land Management System ELMS that will be ‘good for Dartmoor’. These include the Hill Farm Project, Common Cause, Tests and Trails, the Countryside Stewardship Facilitation Fund, the Natural Flood Management and Peatland Restoration projects.
- **Supporting economic development and productivity** - The Authority’s work is focused on managing and enhancing a key economic asset – Dartmoor National Park. There are specific priorities in the draft Business Plan to support local communities and business. These include: Moor Otters 2, the Pathways Project and enabling good development - proactive planning for affordable housing delivery, economy and regeneration.
- **Climate change and enhancing nature** – The focus on peatland restoration and natural flood risk management supports this theme along with the work to deliver Biodiversity Net Gain through positive planning. Proposals for a green transport strategy will aim to reduce car travel and encourage other forms of transport – also contributing to health and well-being.
- **Engaging with people and communities** is reflected in a number of the key actions in the draft Business Plan including Moorscapes - an external funding bid to the National Heritage Lottery Fund to further develop the successful Parishscapes project and build links with communities of interest and other hard to reach groups; the outreach and engagement strategy aims to deliver a significant increase in the range and number of people who visit or engage with the National Park and develop a long lasting connection with the place.

- **External funding** – The draft Business Plan includes the delivery of Moor Otters2 and active promotion of Donate for Dartmoor. It also includes development of ‘Moorscapes’ (an application to the National Lottery Heritage Fund to extend Parishscapes) and, with learning from *Moor than meets the eye*, development of a larger external funding bid, to help us deliver key priorities in the Management Plan.

2.4 The Business Plan is supported by a performance management framework that comprises three elements:

Dashboards for key services/teams - these are intended to provide management information on how a service/team is performing and an opportunity to highlight key achievements and pressure points. They use existing data sets. Their primary value should be to the manager for that service area - for them to use, to review and potentially improve performance. They are also reported quarterly to Leadership Team (as part of the meeting that focuses on performance) and Leadership Team will reflect key issues in reports to Audit and Governance Committee. In addition, Audit and Governance Committee can request to see any dashboard. The dashboards help to demonstrate the ‘day job’ whilst the Business Plan focuses on key strategic projects.

Performance indicators (PIs) - these are data sets that we use to gauge the ‘quality of the service’ we provide and/or potential impact. The current set comprises a mixture of PIs: some are set nationally by Government (e.g. speed of planning decision); some have been agreed collectively by the English National Park Authorities so that we can benchmark performance; and some are agreed locally (i.e. by Dartmoor National Park Authority). The PI data is reported to Audit and Governance Committee. As part of the work on the Management Plan review we will be looking at the State of the Park PIs over the next 12 months.

Business Plan monitor - this document tracks progress with the key actions identified in the Business Plan. It is reported quarterly to Leadership Team and to Audit and Governance Committee. The intention is to better project manage the key actions identified in the Business Plan, ideally to ensure they are delivered on time and within budget, but also to identify, at an early stage, if there are any actions we are at risk of not delivering and to consider any support measures to address project slippage, or whether we signal to Members that action will not be completed and why.

3 Equality and Impact Assessment

3.1 Under the Equality Act 2010 (the Act) the Authority must prepare and publish one or more objectives it thinks it should achieve in pursuance of the general duty under the Act. Members will note that the Business Plan includes specific priorities to promote a positive experience of Dartmoor National Park for residents and visitors and to be an excellent organisation. These priorities will include actions which promote equality of access and awareness and understanding of diversity and have been incorporated into the performance monitoring framework.

4 Financial Implications

- 4.1 The draft Business Plan has been developed in parallel with the 2020/21 Revenue Budget. As noted in NPA/20/005 we still await our grant settlement from Defra; we believe this will be a one year settlement in advance of the Spending Review later in the year. Setting robust work programmes when we are unclear about future core funding is difficult. The draft Business Plan is ambitious in the work it proposes and includes key actions to diversify our income base. Nevertheless, the importance of sustained core funding is essential. External funding (grants, donations, sales and charges) should not be seen as a substitute for National Park Grant. The staff resource provided, funded by National Park Grant, is the main mechanism for delivering practical work, meeting our statutory obligations and purposes, and securing additional income.
- 4.2 2019/20 was the last year of the Heritage Lottery Funded Landscape Partnership which has been an important source of funds for practical conservation, access and community engagement work within the Partnership area. The draft Business Plan includes an action to develop a new 'landscape scale' partnership bid for Lottery funding. There is an opportunity cost in developing funding bids, especially if they are unsuccessful.
- 4.3 Some of the key actions are dependent on external funding (i.e. they will not happen if funding is not secured). It should also be noted that a reduction in National Park Grant will also mean that work programmes may not be completed.

5 Conclusion

- 5.1 The draft Business Plan is ambitious, with a blend of key actions that will deliver management and enhancement of the environment, opportunities for people to get engaged and promote the enjoyment and understanding of Dartmoor's special qualities. These actions will help support the Dartmoor economy and the communities that live within the National Park. The key ingredients for most of the actions are staff time and partnership working.
- 5.2 There is clear correlation between the ambition of the Government to enhance the environment and re-connect people with it, the declaration of climate emergency and the actions within the draft Business Plan. Whilst many of the actions are funded there are a number that relate to work programmes designed to develop future funding bids and/or secure other forms of funding (voluntary donations, commercial sponsorship etc.).

KEVIN BISHOP & ALLY KOHLER

DRAFT
DARTMOOR NATIONAL PARK AUTHORITY
BUSINESS PLAN 2020-2021

Welcome

Government commissioned an independent review of National Parks in 2019 led by Julian Glover. His report, published in Autumn 2019, outlines an ambitious vision to make all the National Parks in England better for people and better for wildlife. We welcome this agenda and hope the Government, and others, will help us deliver this shared vision by providing the support required.

In February the Authority consulted on a draft review of the National Park Management Plan. Many people have been involved in the development of the draft plan which has been undertaken within the context of the Government's 25 Year Environment Plan and the 8 Point Plan for National Parks. The Plan follows the spirit of the Glover Review findings and takes forward what is possible within current structures, powers and funding. In particular, the Plan embraces the challenge to be bold and ambitious in setting the future Vision for Dartmoor, which echoes the clear message from local communities and communities of interest during preparation of the Management Plan. The Plan sets a vision and ambition to make Dartmoor better for people, nature and heritage.

In May 2019 the UK Parliament approved a motion declaring a climate change emergency and for the Government to achieve net zero emissions before 2050. In July 2019 the Authority declared a climate and ecological emergency and have developed an active Action Plan for the Authority to be carbon neutral by 2025. Since 2010 we have already achieved a 40% reduction in Carbon Dioxide emissions from our own operations but want to do more both in our daily operations and through management of the National Park. This is a strong theme in the revised Management Plan alongside nature enhancement.

Our ambition is to act as a **powerful and effective enabler and advocate** for Dartmoor National Park, working with others to deliver a National Park that is thriving, inspirational and valued. The Business Plan sets out what this means in practice and how we will seek to achieve it. We have reflected the vision and ambition of the new draft Management Plan in the Business plan - there is always a close correlation between the Authority's priorities and those identified through consultation and engagement in the preparation of the Management Plan.

We seek to maintain and enhance Dartmoor's natural environment and to conserve and promote its internationally important cultural and historic environment. We want to welcome a wider range of people and in doing so increase the health and well-being benefit for individuals and to wider society. We accept that this will need careful management and help from our visitors to look after and care for the National Park. We want Dartmoor to be a great place to live and work for people of all ages; low carbon, thriving and resilient communities and businesses, a diverse economy with access to employment and housing. We aim to support the farming community in uncertain times

and help them prepare for the new ELMS scheme so that they can continue to farm on Dartmoor, delivering positive environmental outcomes whilst maintaining thriving farm businesses.

Our challenge is to **bring everybody together** to help deliver this new vision for Dartmoor: making choices that balance the needs of people and place, embrace positive change and inspire the next generation to help shape its future.

Pamela Woods, Chair

Kevin Bishop, Chief Executive

DRAFT

Vision for Dartmoor National Park

Dartmoor National Park is an extraordinary landscape: shaped by nature and humans over time, steeped in history but always changing, one of Britain's finest. It has the power to inspire and enrich lives.

Our Vision is to make Dartmoor better for future generations: climate resilient, nature rich, beautiful, connected to the past; a place where people of all ages and backgrounds can live, work or visit. A place that is loved, cherished and cared for.

It will be:

- **Alive with nature:** Networks of healthy habitats that are home to many different plants, insects and animals create a more resilient natural environment connected within and across the boundary of the National Park. Some areas will feel wilder as nature is allowed to take its course.
- **Celebrated and enhanced:** Dartmoor's natural beauty and rich cultural heritage is better understood, valued and looked after.
- **A warm welcome for all:** Enriching people's lives, reaching out to people from all backgrounds, connecting them with this special place. Transformative experiences will inspire people to care for the National Park.
- **A great place to live and work:** People of all ages can enjoy living and working in low carbon, flourishing communities that are connected physically and digitally. Farming and forestry businesses play a key role in delivering a high quality environment and local products alongside a range of other public benefits.
- **Carbon neutral:** Dartmoor's peatlands, soils and woodlands will store significantly more carbon. Responding to climate change will be embedded in our way of life, making the best use of natural resources and reducing carbon emissions.

Everyone will come together to deliver this Vision for Dartmoor, make choices that balance the needs of people and place, embrace positive change and inspire the next generation to help shape its future.

How we will deliver for Dartmoor National Park

"We will act as an enabler and advocate for Dartmoor National Park, working with others to deliver a National Park that is thriving, inspirational and valued."

By this we mean:

Enabler	Making things happen Generating and receiving ideas Experimenting and learning Prepared to take managed risks
Advocate	Raise the profile The voice for Dartmoor National Park Lead by example
Others	From local communities to Ministers
Thriving	From local businesses, farming, biodiversity to cultural heritage and local services
Inspirational	Through the work we do, and the special qualities of the National Park, inspire people to: <ul style="list-style-type: none"> • Engage, enjoy and help look after the National Park; • Support and demonstrate how to live differently (i.e. within environmental limits); • Encourage people to try new things, learn more.
Valued	Support for the National Park Recognition by local communities, visitors, Government and partners of the importance of the National Park and the work of the Authority

In addition a number of core values will underpin the way in which we work. We will:

- ensure that our relationships with the public, partners and each other are founded on honesty, transparency, impartiality and consistency, demonstrating equality and fairness in everything that we do and being open to challenge;
- value the people who work for Dartmoor - our staff, Members and volunteers, and seek to involve, empower and develop them;
- place the environment at the heart of everything we do.

Our Business Plan

Dartmoor National Park Authority is a small organisation with limited resources available to fulfil our two statutory purposes of:

- *conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park;*
- *promote opportunities for the understanding and enjoyment of the special qualities of the area by the public.*

In carrying out this work, we are also required to:

- *seek to foster the economic and social well-being of local communities within the National Park.*

In February 2020 we issued a consultation on the draft National Park Management Plan review. This is an important document for the National Park and the Authority, it sets out a future vision for the management of the National Park and key actions to achieve that vision. Many partners and stakeholders have helped shape the draft plan through workshops, themed working groups and a public consultation. We have sought to embed the central messages from the Glover Review in the draft and ensure that it relates to national priorities as expressed in the 25 Year Environment Plan. It is a bold and ambitious plan that will require a partnership approach if it is to be successfully delivered.

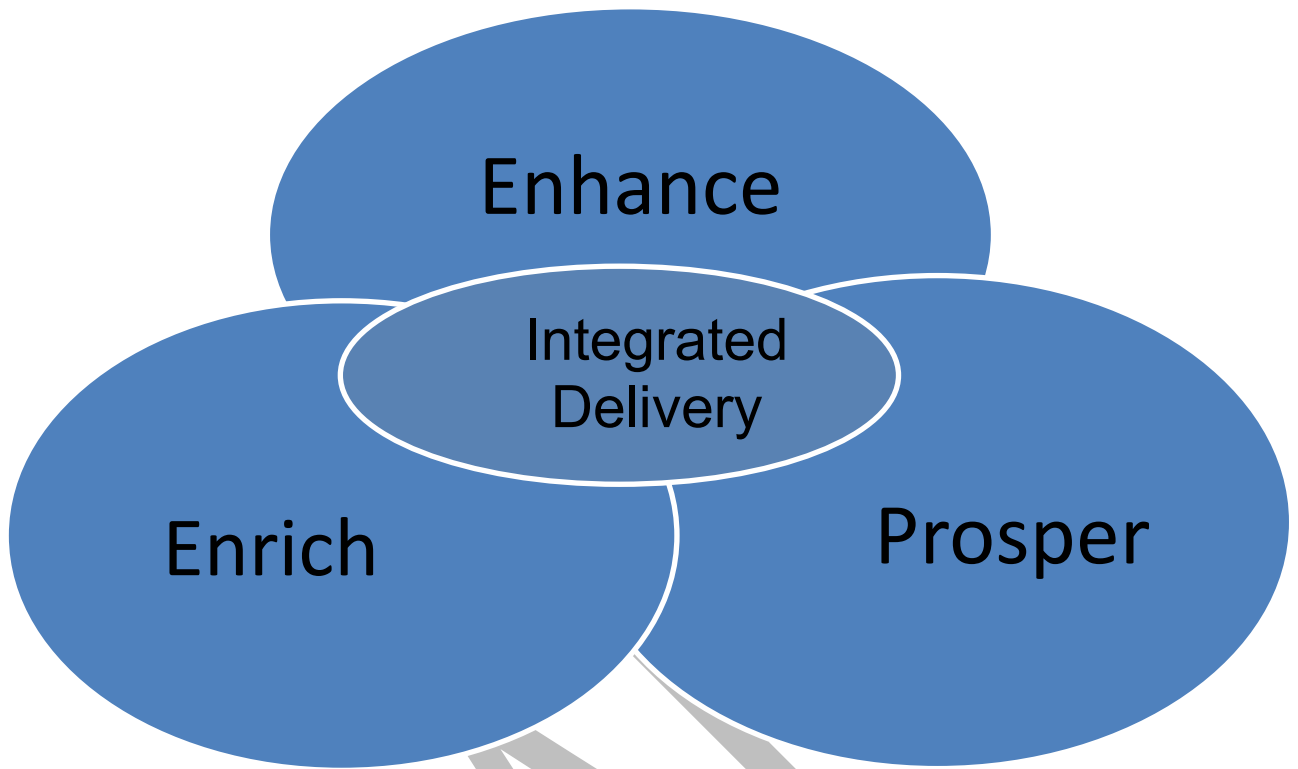
Much of the work we do is undertaken in partnership with others in order to achieve the best outcomes for Dartmoor National Park, the people who live and work here and those who visit this special place. Our partners range from our constituent authorities (Devon County Council, West Devon Borough Council, Teignbridge District Council, South Hams District Council and Mid-Devon District Council) to environmental Non-Governmental Organisations (NGOs), landowners, land managers and community groups.

The priorities in the Business Plan reflect the vision and key priorities as outlined in the draft Management Plan; they are informed by Government (in particular the 25 Year Environment Plan, 8 Point Plan for National Parks and the findings of the Glover Review) and they also reflect the views of Members and staff.

Due to the strong link to the National Park Management Plan, this Business Plan reflects the key themes of the Plan: Enhance, Enrich and Prosper.

The Way we Work

Whilst our work is presented under four themes our overall goal is to work in an integrated way (often with partners) to ensure that each work area or priority action considers and delivers across all themes and helps Dartmoor become carbon neutral.



Measuring progress

At the end of each financial year, the Authority completes an annual performance review which contains information about the progress made in delivering the actions in the Business Plan, together with achievement against a comprehensive set of performance indicators.

The Work of the Authority.

This plan sets out the key strategic actions we will develop in 2020/21 in support of our priorities. Our core business continues on a daily basis, this includes:

Enhance

Alive with Nature, landscape beauty and cultural heritage celebrated and enhanced, responding to climate change, making the best use of natural resources and reducing carbon emissions

Undertaking, researching and monitoring Dartmoor's biodiversity, cultural heritage and landscape	Over 26% of Dartmoor is of international importance for biodiversity. There is also an extensive network of County Wildlife Sites.
Implementing practical conservation and enhancement works for biodiversity, cultural heritage and landscape.	Over 1,000 Scheduled Monuments. Most important area of Bronze Age archaeology in Western Europe. Remove or reduce risk to over 10 Scheduled Monuments a year through proactive management, advice and significant volunteer effort.
Offering advice and supporting conservation on Dartmoor through practical projects and partnership working	100% of our key indicator species stable or increasing (in terms of population) supported by on-going partnership working for species such as fritillary butterflies and waders.

Enrich

A warm welcome for all. Responding to climate change will be embedded in the way we use Dartmoor

Managing and maintaining public rights of ways and open access land	734km public rights of way and 88% classified easy to use. 46,663ha of open access land.
Operating three visitor centres and a number of car parks and public toilets	170,000 visitors to Visitor Centres.
Providing opportunities for people to learn more skills through volunteering	9,000 volunteer days organised or supported.
Supporting formal education and life-long learning	1,300 school children involved in formal educational trips.

Prosper

A great place to live and work. Responding to climate change will be embedded in our way of life.

Enabling development that is 'good for Dartmoor' through our role as the Local Planning Authority	Circa. 600 planning applications per year.
Providing business support and training to over 350 hill farmers through the Dartmoor Hill Farm Project	90% of Dartmoor is farmed helping to deliver the landscape that millions enjoy every year.
Championing better communication networks	Securing funding for a wireless superfast broadband network that should ensure that over 90% of Dartmoor premises have access to superfast broadband.

Be an excellent organisation

A carbon neutral efficient and effective organisation that works with partners to deliver the best outcome for Dartmoor

Ensuring our financial processes are robust and suppliers are paid within 30 days	99% of invoices paid on time.
Bringing in excess of £4.8m each year to Dartmoor (in terms of funding for our core work and other partnership projects)	Every pound spent by the Authority generates over £4.00 for the local economy.
Managing our own estate, including the Higher Uppacott Grade 1 Listed Building and areas of open moorland such as Haytor	Higher Uppacott is a rare example of a medieval longhouse with an unaltered shippon (cattle shelter). Haytor is one of the most visited parts of the National Park – over 70,000 visits per annum - and an important habitat for rare species such as the Curlew and Cuckoo.
Reducing our carbon footprint	Since 2009/10 we have reduced our carbon emissions (Scope 1 and 2) by over 50%.

KEY ACTIONS TO DELIVER BUSINESS PLAN PRIORITIES

Priorities:

- P1 Better for Nature
- P2 Better for Cultural Heritage
- P3 Better for Farming and Forestry
- P4 Better for People
- P5 Better for Communities and Business
- P6 An excellent organisation

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Key Action	Outcome sought		Target start date	Target end date	Contribute to carbon neutral	25 Year Env Strategy	Glover Review
Deliver DNPA's Climate Action Plan	Carbon neutral Authority by 2025	P6	Started	2025	✓		
Implement Dartmoor Test and Trails and develop the moorland vision to cover the whole of the NP	A new ELMS that reflects Dartmoor's special qualities and provides scope to maintain and enhance a wide array of public benefits. A role for the Authority in co-designing the system and facilitating in its delivery through advice.	P1 P2 P3 P4 P5 P6	Started	2024	✓	✓	✓
An enhanced Visitor Centre Postbridge	An enhanced National Park Visitor Centre at Postbridge which will enable us to better interpret the archaeological and cultural importance of Dartmoor, support local economic development and enhance peoples' experience of the National Park.	P4 P5	Started	2020		✓	✓
Complete the revised Management Plan for Dartmoor National Park	A Management Plan that is owned and supported by stakeholders, outlines a clear vision for the National Park and provides a framework for partnership working.	P1 P2 P3 P4 P5 P6	Started	2020	✓	✓	✓
Deliver the Next Generation Manifesto	The next generation engaging with and influencing the future of the National Park; championing delivery of the next generation manifesto.	P1 P2 P3 P4 P5 P6	Started	On-going			

Key Action	Outcome sought		Target start date	Target end date	Contribute to carbon neutral	25 Year Env Strategy	Glover Review
Local Plan	An adopted Local Plan that (together with the Management Plan) provides a framework for the future development and management of the National Park, helps deliver National Park purposes and vibrant communities	P1 P2 P3 P4 P5	Started	2021	✓	✓	✓
Enabling development that is good for Dartmoor	Proactive planning enabling support for affordable housing delivery, economy and regeneration	P5	2020	Ongoing	✓	✓	✓
Delivering Biodiversity Net Gain	Start preparing a Supplementary Planning Document (SPD) to guide the delivery of a broad approach to Biodiversity Net Gain through emerging Local Plan policy. With potential for pilot project links with ELMS and NFM.	P1 P4 P5	2020	2021	✓	✓	✓
Peatland Restoration	Restoration and enhancement of 276ha of peatland on Dartmoor between 2018 and 2021. Agreed strategy and funding for future delivery.	P1 P3 P4	Started	Current programme funded until 2021	✓	✓	✓
Common Cause	Shared local visions for commons, showcasing new approaches to management of common land to deliver a range of public benefits. Improved public understanding of commoning. Contribute to thinking about ELMS.	P1 P2 P3 P4	Started	Subject to funding – decision expected March 2020	✓	✓	✓
Develop a network of landscape scale nature recovery areas	Test nature recovery at a landscape scale in two pilot areas working closely with farmers, landowners and local communities.	P1 P4	2020	2022 Implementation Subject to funding	✓	✓	✓

Key Action	Outcome sought		Target start date	Target end date	Contribute to carbon neutral	25 Year Env Strategy	Glover Review
Produce species re-introduction strategy	Strategic approach focusing on species that support the greatest environmental benefit and are supported by Dartmoor community.	P1 P4	2020	2022 Implementation Subject to funding	✓	✓	✓
Natural Flood Risk Management	Test natural approaches to flood management that deliver a range of public benefits in a way that supports the farming/land owning community. Agree future priorities and funding. Contribute to thinking on ELMS.	P1 P5	November 2018	Current project ends 2021	✓	✓	✓
Dark Night Skies	Ensure that our policy framework supports Dark Night Sky status and, subject to cost, apply for International Dark Sky status	P1 P2 P4 P5	Ongoing	2021	✓	✓	✓
Dartmoor Hill Farm Project	Support for farm businesses across the National Park to help them deliver a range of public goods as part of a sustainable business and promote effective collaboration.	P1 P2 P3 P5	Started	Funded until Feb 2023	✓	✓	✓
Love Moor Life	Changed behaviour of all visitors, locals and tourists, by improved understanding of Dartmoor and its special qualities leading to reduced number of incidents and bylaw offences	P1 P2 P3 P4 P5	Started	Ongoing		✓	
Pathways Project	Access routes and associated infrastructure that is in good condition, easy to use and helps support the Dartmoor economy; delivery supported by volunteers and fundraising.	P4 P5	Started	Ongoing		✓	✓

Key Action	Outcome sought		Target start date	Target end date	Contribute to carbon neutral	25 Year Env Strategy	Glover Review
Junior and Youth Rangers	An expanded programme that provides a range of young people from all backgrounds with an enjoyable experience and a better understanding of the National Park; nurturing the skills and passion and building a long term relationship between the young people, Dartmoor and the Authority. Future ambassadors.	P1 P2 P4	Started	Ongoing		✓	✓
Outreach and Engagement Strategy	A funded strategy delivering a significant increase in the range and number of people who visit or engage with the NP and develop a long lasting connection with the place.	P4	Started	Ambition of delivery will depend on external funding		✓	✓
A healthy future for local produce	Agreed programme of activity to further develop and help promote local produce; reducing food miles and supply chains	P3 P5	2020 subject to funding		✓	✓	
Moor Otters 2	A public arts trail that raises income for National Park projects, supports local businesses, helps engage new audiences and raises the profile of the National Park	P1 P4 P5 P6	Started	Summer 2020		✓	✓
Contribute to Government reviews and policy	Glover, CSR, Brexit A policy framework that supports National Parks and the work of the Authorities and provides for the future enhancement of the place and further improvements to the work of the authorities.	P6	Ongoing	Spending Review 2020 Government response to Glover 2020	✓	✓	✓
Moorscapes	A community grant scheme for projects that enhance the environment, respond to climate change and/or help a wider range of people understand or enjoy it.	P1 P2 P4 P5	June 2020	Subject to external funding	✓	✓	✓

Key Action	Outcome sought		Target start date	Target end date	Contribute to carbon neutral	25 Year Env Strategy	Glover Review
Develop a green transport and behaviour change strategy	Carbon emissions from traffic in the National Park are reduced as visitors and local communities have options for, and choose, greener travel.	P4 P5	June 2020	March 2021 Delivery will be subject to funding	✓	✓	✓
Deliver the revised Dartmoor Recreation Strategy	Projected increase in visitor numbers are positively managed to help people enjoy the National Park whilst supporting nature recovery and providing positive benefit to local businesses and communities	P1 P2 P3 P4 P5	Started	On-going	✓	✓	✓
Develop a new partnership project to deliver Management Plan priorities and apply for National Heritage Lottery Funding to deliver. <i>Or Develop new NHLF Application</i>	An external funding package to help deliver key priorities in the NPMP review including nature recovery, environmental enhancement, engaging and welcoming a wider range of people and supporting sustainable use of the NP.	P1 P2 P3 P4 P5	Started	2027	✓	✓	✓
Developing a strong evidence base	Strong partnerships with local Universities to develop, deliver and share research and/or expert knowledge to support decision making .	P1 P2 P3 P4 P5 P6	Ongoing	Summer 2021		✓	

Funding and expenditure

To be determined – subject to National Park Grant announcement and draft revenue budget.

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DARTMOOR NATIONAL PARK AUTHORITY

6 March 2020

LOCAL PLAN SUBMISSIONReport of the Head of Forward Planning and EconomyRecommendation: That Members:

- (i) Agree to submit the publication version (final Draft) Local Plan to the Secretary of State;
- (ii) Note the Habitat Regulations Assessment Addendum (Appendix 2);
- (iii) Endorse the updated Duty to Co-operate Statement of Common Ground (Appendix 1);
- (iv) Agree the procurement of the Programme Officer;
- (v) Delegate to the Chief Executive, in consultation with the Chair, authority to make minor changes to the submission documents, including the Environmental Reports, and the Statement of Common Ground, if considered necessary.

1 Introduction

- 1.1 This Report seeks Member agreement to submit the Local Plan to the Secretary of State (the Planning Inspectorate or 'PINS') for examination. Formal submission would commence the final stages of the Local Plan Review with the aim of adopting the final Plan in 2021.
- 1.2 The Local Plan is the starting point for all planning decisions made in the National Park. The review of the Local Plan started in 2016. The development plan is being reviewed in its entirety, leading to a single local plan covering strategic, local and site specific policies, as well as minerals and waste.
- 1.3 The Local Plan for submission is not included again within these papers, but Members all have printed copies, and the document has been online at www.dartmoor.gov.uk/localplanreview since September 2019.

2 Background

- 2.1 The Local Plan has been through a number of informal and formal consultation stages in line with the adopted Local Development Scheme (the 'timetable' for the local plan) and the Statement of Community Involvement. These have been well documented with Members throughout the process, and include in particular:
 - Issues Consultation – an informal consultation at the start of the process, designed to enable communities and other stakeholders to advise on the priorities and scope of the plan, and reflect on current adopted policy
 - Parish Councils consultation – a consultation specifically with Parish/Town Councils on the infrastructure, services and facilities within their communities
 - Sites Consultation – a focussed consultation in the larger settlements, on potential development site options

- Regulation 18 Consultation - the first formal consultation stage on a full first draft Local Plan
- Regulation 19 Consultation – a final draft or ‘publication version’ revised in response to the comments on the first draft. This version is proposed for Submission.

2.2 It is supported by a robust evidence base which has been available for comment alongside each stage of the Local Plan consultation, and is published on our web site (www.dartmoor.gov.uk/localplanreview).

3 Duty to Co-operate

3.1 The Duty to Cooperate is a legal test that requires active co-operation between local planning authorities and other public bodies to maximise the effectiveness of strategic policies in local plans. The Duty to Co-operate process should identify any strategic cross-boundary issues which the authorities/bodies should address. Importantly it is not a ‘duty to agree’, but the Authority must be able to demonstrate that the Local Plan has been prepared taking into account the Duty to Co-operate, and actively engaged on cross-boundary issues. We also seek to influence adjoining Authorities in pursuit of National Park purposes through the Local Plan, and leveraging the ‘Section 62 Duty’ for Authorities to have due regard to National Park purposes.

3.2 A revised Duty to Co-operate ‘Statement of Common Ground’ has been prepared (Appendix 1). The first iteration has been signed by some partners, who have confirmed that the revisions do not affect their interests. The revisions are a result of discussions with the Plymouth and South West Devon Joint Local Plan Authorities, Natural England and Teignbridge District Council, and relate to housing delivery, and Habitat Regulations Assessment. We would now seek formal agreement of this statement with the remaining partners. Members are asked to endorse this Statement.

3.3 As a result of the discussions around the Statement of Common Ground, Officers have prepared a Monitoring and Governance Topic Paper, which outlines specific processes in place to provide the partners with assurance around delivery once the Local Plan is adopted. This has been considered by the Local Plan Steering Group, and is published online (www.dartmoor.gov.uk/localplanreview).

4 Environmental Reporting

4.1 The Local Plan has been the subject of a number of appraisal/assessments. These are important assessments in adding value to the plan-making process, ensuring specific issues are taken into account in the drafting of policy. They are also important technical/legal requirements. The use of external consultants for this process adds value through independent third party scrutiny by professionals in their field. The following areas of appraisal have been completed:

4.2 Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)

SA/SEA is an iterative and ongoing process that informs plan-making by assessing developing elements of the plan, evaluating and describing the ‘likely significant effects’ of implementing the plan, and suggesting possibilities for mitigating significant adverse effects and enhancing positive effects.

- 4.3 At the Authority meeting held on the 6 September 2019 Members endorsed the SA/SEA (NPA/19/026). It is not necessary to update this report prior to submission. The SA report incorporates Strategic Environment Assessment, Equalities Impact Assessment, Health Impact Assessment and the conclusions of the Habitats Regulations report.
- 4.4 **Habitats Regulations Assessment (HRA)**
Habitats Regulations Assessment (HRA) is required to consider whether a plan or proposal will impact on the integrity of European habitat. The HRA screening identified that there were no Likely Significant Effects for air quality changes, disturbance, changes to water quality or levels, or habitat loss/fragmentation – alone or in-combination with other plans. However, it identified uncertainty with regard to the potential for Effects associated with air quality, disturbance and habitat loss or fragmentation on the three Special Areas of Conservation (SACs) located within the DNPA boundary.
- 4.5 This was investigated further through Appropriate Assessment. This determined that due to the small size and location of the proposed new development, together with policy mitigation, significant adverse impacts on air quality and habitat loss or fragmentation can be avoided, alone or in-combination with other plans.
- 4.6 An Addendum Report for the HRA (Appendix 2) has been prepared which considers in more detail the potential recreational impacts on the Plymouth Sound and Estuaries SAC and Tamar Estuaries Complex SPA. Members consider a report on this issue at their 10 January 2020 meeting. Subsequently, DNPA officers have met with officers of Natural England and the Plymouth and South West Devon Joint Local Plan Authorities to agree a way forward. The parties have agreed that the DNPA Local Plan HRA will recognise a potential recreational impacts, but that the Mitigation Strategy is already provided for by development outside of the National Park. This is documented in detail in the HRA Addendum, the Duty to Co-operate Statement of Common Ground (version 2) and a further ‘fall back’ position is provided for in DNPA’s Monitoring and Governance Topic Paper.
- 4.7 The Addendum Report also responds to representations and ongoing discussion with Natural England around the Recreational Impact of development outside the National Park, upon the SACs within it. DNPA and NE have agreed, based upon current available evidence, to conclude No Likely Significant Effects, but to continue to work at a strategic level to work together to consider the broader issue of recreational impacts upon Dartmoor National Park.

5 Publication – Representations (comments) received

- 5.1 The Regulation 19 version of the Local Plan was published between 16 September and the 1 November 2019. During this period a number of outreach sessions were held in communities, and a Parish Council Workshop hosted at Parke.
- 5.2 The Reg 19 Local Plan attracted 932 Representations from 214 individual respondents. At this formal stage consultees are asked targeted questions in respect of the tests of soundness and legal compliance, in line with PINS guidance. Unless the Representations received indicate to the Authority that further changes are needed to the Local Plan to make it sound (in which case a further round of

consultation would be required) the Local Plan, together with the Representations received and the evidence base, are submitted to PINS for examination.

- 5.3 Officers are of the opinion that the Local Plan is sound and legally compliant, and therefore should be submitted. The Representations received, which may be considered by the Inspector as part of the Examination process, are summarised in Table 1 (note this is not an exhaustive list, but an overview of key points raised).

Table 1. Summary of Reg 19 Local Plan Representations

Subject	Issue raised in Representations
National Park Purposes and Duty	Inconsistency in the wording with national policy, or the emphasis or weight of the purposes, duty, or presumption in favour of sustainable development.
Major Development	Inconsistency with the language NPPF
Climate Change	Policy could be clearer in respect of mitigation and adaption. Local Plan should go further in respect of climate change response.
Spatial Strategy	General support for strategy. Some Local Centres could take a greater share of housing development. Greater emphasis needed on brownfield over greenfield. Additional settlements should be included within the settlement strategy.
Dark Night Skies	Should have greater emphasis, and be referenced in individual policy areas
Biodiversity policy	Policy could be clearer in respect of mitigation hierarchy; should conserve <i>and</i> enhance; clearer reference to irreplaceable habitat needed; International sites definition should be extended; exceptional circumstance should not be allowed.
Biodiversity Net Gain	Policy could be clearer in respect of Net Gain v biodiversity enhancement
Sustainable construction	Some confusion between space standards and Building Regulations; policy should not repeat or anticipate government policy change.
Housing Strategy	Housing figure should be based upon a full Housing Market Needs Assessment; figure should be higher to meet need; higher figure is not justified; higher figure will not be delivered; figure should be expressed as a target.
Affordable housing	Discount for affordability should be greater; size restriction to maintain affordability is too restrictive.
Householder extensions	Greater consideration should be given to outbuildings within the allowance.
Gypsy and traveller policy	Criteria-based approach is not adequate to meet needs
Low impact residential development	Requirement to locate in more sustainable locations is overly restrictive; policy criteria are too onerous.
Agricultural Workers dwellings	Tying the new dwelling to the land will make development unviable
Transport	Local Plan should safeguard the former Okehampton to Tavistock rail route
Electric Vehicle Charging Points	Policy is welcome; policy should be left to government and not set locally.

Town centres	Threshold for the town centre sequential test is not appropriate; marketing periods are not long enough
Tourist accommodation	Should encourage camping pods and shepherd huts
Minerals development	Policy should refer to large scale, and not major.
Renewable energy	Large scale renewable energy development should be allowed
Site allocations	Promotion of specific 'omission' sites for development in addition/substituting allocated sites, including at South Brent, Buckfast, Buckfastleigh, Mary Tavy, Moretonhampstead, Yelverton
Site allocations	Objections to specific sites for development, including at Yelverton, Moretonhampstead, Buckfastleigh
Site allocations	Support for the inclusion of indicative site yields; objection to specific indicative site yields

5.4 Officers have prepared a detailed report of the Representations received, which has been noted by the Local Plan Steering Group. A summary of the Representations and the Authority's response to those is included in the Statement of Consultation (known as the Regulation 22 Statement).

5.5 The Representations received would now be considered by an Inspector, though the Authority may through the examination process propose or agree modifications in response to these, including through specific statements of common ground.

6 Examination

6.1 Submission of the Local Plan to the Secretary of State (in practice the Planning Inspectorate) will begin the process of public examination of the Local Plan.

6.2 The Local Plan examination process is likely to take around 12 months and include the following key steps:

- Submission to the Secretary of State
- Questions from the Inspector
- Public Hearings (at which those who have made a Representation may be invited by the Inspector, to participate)
- Proposed Modifications (changes to the plan required to make it sound)
- Appraisal of and consultation on Proposed Modifications
- Inspectors Report of the Examination
- Adoption

6.3 Officers are in the process of appointing a Programme Officer, who acts as the liaison between the Authority, the Inspector, and Respondents. The Programme Officer is responsible for the day to day administration of the examination before, during and sometimes after the hearing sessions, and will need to be in post when the Local Plan is submitted.

6.4 The appointment of the Programme Officer is budgeted for; however, as it is consultancy expenditure in excess of £5,000 Members are requested to agree this.

7 Status of the Draft Local Plan

- 7.1 The National Planning Policy Framework sets out that decision-takers may give weight to relevant policies in emerging plans according to their stage of preparation, the extent to which there are unresolved objections to relevant policies, and their degree of consistency with policies in the National Planning Policy Framework.
- 7.2 On this basis, some policies of the submitted Local Plan will begin to carry weight at this stage. The adopted Core Strategy and Development Management DPD must remain the principal policies for the consideration of planning applications, however, officers will advise in due course which policies may be taken into account in decision making.

8 Financial Implications

- 8.1 The review of the Local Plan is a significant project for DNPA. It is budgeted for within the earmarked reserves. This is on the basis of the project plan which provides for a single draft (Regulation 18) and then publication (Regulation 19) consultation leading to submission. The timescales for the examination and associated costs are estimated.
- 8.2 The project plan includes a risk assessment which considers costs. Significant alterations arising from consultation, procedural failures, national policy or legislative change could lead to variation from the expected programme. This could cause extension of timescales, resulting in additional officer resource requirements, and costs associated with the updating of evidence.
- 8.3 Whilst the risk cannot be fully mitigated, the project plan included early public engagement with the non-statutory Issues consultation, Member engagement through the Steering Group, workshop, and Direction of Travel paper, and careful programming through upcoming procedural stages.

9 Conclusions and Recommendations

- 9.1 Members are invited to agree to submit the Local Plan to the Secretary of State, noting the Habitat Regulations Assessment Addendum and endorsing the Duty to Co-operate Statement of Common Ground. Officers will then assemble the submission documents, with a view to submitting the Local Plan by the end of March 2020.

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Attachments: Appendix 1 - Duty to Co-operate Statement of Common Ground
Appendix 2 - Habitat Regulations Assessment Addendum

Duty to Co-operate

Statement of Common Ground

Dartmoor Local Plan 2018 - 2036

[September-February 2019 \(V2\)](#)



Contents

Dartmoor National Park Local Plan	3
1 Introduction and context.....	3
1.1 Purpose of this Document	3
1.2 Context	4
2 Location and administrative areas covered by the statement Statement of Common Ground	5
3 Key Strategic Matters	6
4 Signatories to the Statement of Common Ground.....	7
5 Other Duty to co-operate partners	8
6 Strategic Matters for Co-operation	9
7 Strategic Priorities	10
7.2 National Park Purposes, Natural and Historic Environment.....	10
7.3 Spatial Strategy	11
7.4 Housing.....	12
7.5 Economy, Business and Leisure	16
7.6 Sustainable Communities, Services and Infrastructure	20
7.7 Minerals, Waste and Energy	22
8 Adjoining Local and Strategic Plans	22
9 Governance arrangements and review of the cooperation process	23
10 Timetable.....	25
Appendix 1: Assessment of Strategic Matters for Duty to Co-operate.....	26

Dartmoor National Park Local Plan

Statement of Common Ground

1 Introduction and context

1.1 Purpose of this Document

- 1.1.1 This document has been produced in response to the requirement in the National Planning Policy Framework (NPPF) that authorities ‘should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these’ (para 27).
- 1.1.2 Dartmoor National Park Authority is preparing a new Local Plan. At the start of the process, the Authority carried out a review of the strategic matters for co-operation under the Duty to Co-operate (DtC) for the Dartmoor National Park Local Plan. This was documented in the Duty to Co-operate Scoping Report (May 2017) which identifies who the Authority expects to engage with throughout the development of the new Local Plan, on what matters, and the ways the Authority will work with Duty to Co-operate partners. The Authority consulted DtC partners on the Scoping Report to confirm that the relevant strategic matters for co-operation had been identified. A few comments were received and the report was updated in the light of comments received.
- 1.1.3 A Draft Statement of Common Ground was produced to inform the consultation on the draft Plan (Regulation 18) in the autumn of 2018, sent to relevant partners and published on the Authority’s website. This provided a record of progress in addressing the cross-boundary issues affecting the Dartmoor National Park Local Plan.
- 1.1.4 This document is a [second](#) updated version prepared for the submission of the Local Plan (published alongside Regulation 19). ~~It and~~ has been revised taking into account comments from partners received during August 2019, [and subsequent comments and discussions which have taken place since \(including since some organisation have signed\)](#). [Following revision to areas specific to their interests only, a](#) formal sign off by [those remaining](#) partners is now sought. Whilst DNPA considers the draft statement to truly and accurately reflect the cooperation undertaken and the areas of agreement and disagreement with relevant bodies, until this is completed, final changes to the document may still be necessary if any errors, omissions or inaccuracies are identified by any of those bodies.
- 1.1.5 The Statement of Common Ground is a new process within the more established Duty to Co-operate framework, and the process is little tested. It is clear that the Duty to Co-operate is an ongoing process through plan preparation and the Statement should be “made publicly available through the plan process” (NPPF

para 27). The assessment of strategic matters for co-operation has been kept under review and updated throughout the plan preparation process.

- 1.1.6 Updated Planning Practice Guidance (Revision 15/03/2019) provides guidance on what should be included in the Statement of Common Ground:

“a. a short written description and map showing the location and administrative areas covered by the statement, and a brief justification for these area(s);

b. the key strategic matters being addressed by the statement, for example meeting the housing need for the area, air quality etc.;

c. the plan-making authorities responsible for joint working detailed in the statement, and list of any additional signatories (including cross-referencing the matters to which each is a signatory);

d. governance arrangements for the cooperation process, including how the statement will be maintained and kept up to date;

e. if applicable, the housing requirements in any adopted and (if known) emerging strategic policies relevant to housing within the area covered by the statement;

f. distribution of needs in the area as agreed through the plan-making process, or the process for agreeing the distribution of need (including unmet need) across the area;

g. a record of where agreements have (or have not) been reached on key strategic matters, including the process for reaching agreements on these; and

h. any additional strategic matters to be addressed by the statement which have not already been addressed, including a brief description how the statement relates to any other statement of common ground covering all or part of the same area.

The level of cooperation detailed in the statement is expected to be proportionate to the matters being addressed. The statement is expected to be concise and is not intended to document every occasion that strategic policy-making authorities meet, consult with each other, or for example, contact prescribed bodies under the duty to cooperate. The statement is a means of detailing key information, providing clear signposting or links to available evidence on authorities’ websites”.

1.2 Context

- 1.2.1 Dartmoor National Park was established in 1951 under the National Parks and Access to the Countryside Act 1949. The purposes of National Park designation are enshrined in national legislation. First set out in the National Parks and Access to

the Countryside Act 1949, and amended by the Environment Act 1995, the two statutory purposes of National Park designation are:

- to conserve and enhance the natural beauty, wildlife and cultural heritage; and
- to promote opportunities for the understanding and enjoyment of the special qualities of the area by the public.

1.2.2 When National Parks carry out these purposes they also have the duty to seek to foster the economic and social well-being of local communities within the National Parks.

1.2.3 Section 62 of the Environment Act 1995 requires Local Planning Authorities and other public bodies to have regard to the purposes for which National Parks are designated.

1.2.4 At 954 square kilometres (368 square miles), Dartmoor is the largest open space in southern England. It has wild open moorland, granite tors and wooded river valleys. Dartmoor is an internationally renowned landscape, which has been shaped by thousands of years of human interaction with its demanding environment. It has a rich diversity of habitats resulting in part from non-intensive husbandry and land management.

1.2.5 The national status of the National Park is given great weight in national planning policy and para 172 of the NPPF (2019) states *'great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues.*

2 Location and administrative areas covered by the statement Statement of Common Ground

2.1.1 Dartmoor National Park Authority is the local planning authority and the minerals and waste planning authority for the whole of the National Park It is not responsible for other matters, such as transport, education, health or flood risk planning which are undertaken by Devon County Council. District Councils are responsible for other functions, such as economic development, housing, and environmental health.

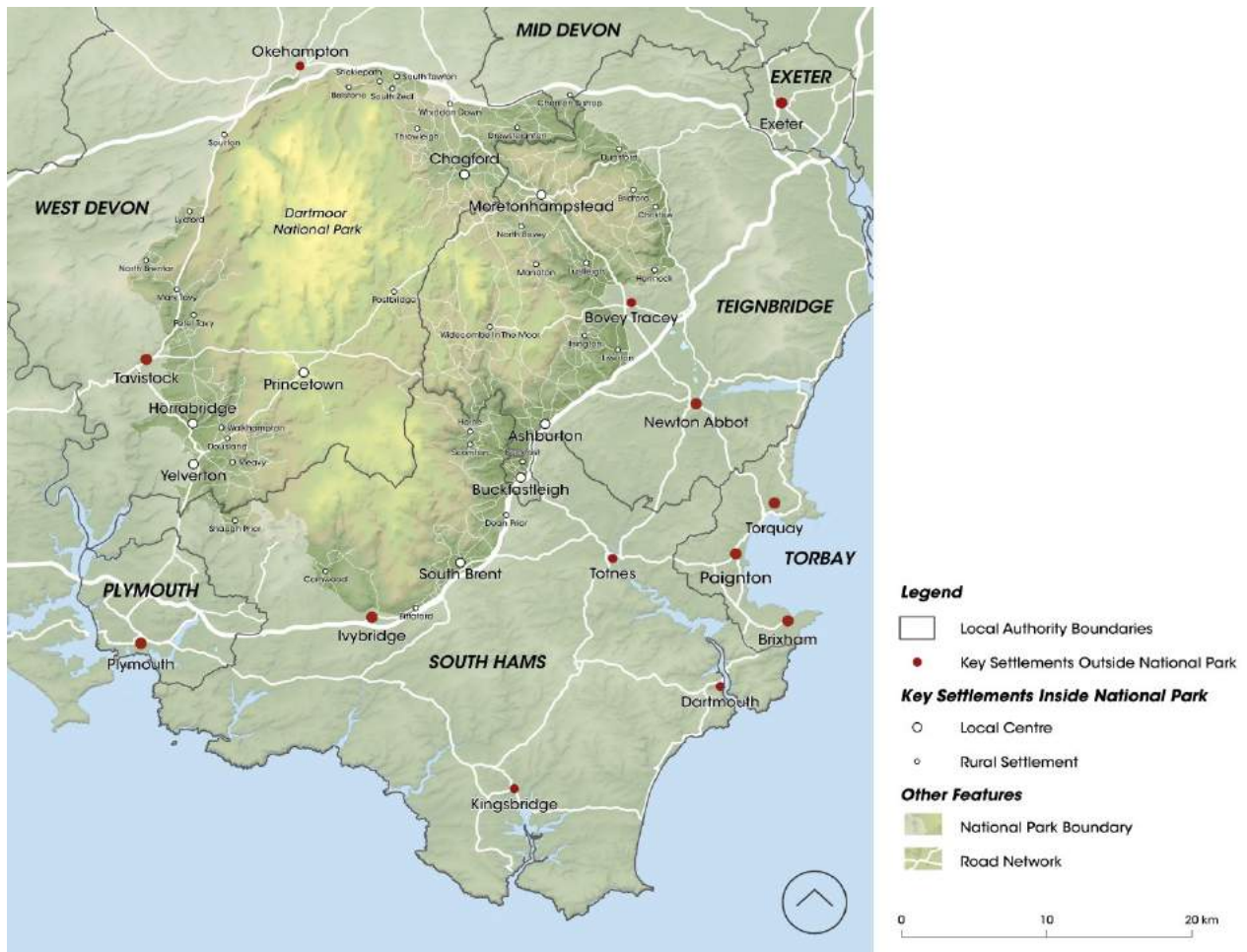


Figure 1. Map showing Dartmoor National Park and adjoining authority areas

3 Key Strategic Matters

3.1.1 The Statement of Common Ground is expected to contain the key strategic matters which require cross-boundary cooperation to address. In providing guidance on how to identify strategic matters National Planning Practice Guidance advises that *‘Paragraphs 20-23 of the NPPF (Feb 2019) sets out the matters that the strategic policies should make provision for, this is not an exhaustive list and authorities will need to adapt this to meet their specific needs. For local planning authorities this is linked to matters set out in sections 33A(4) and 19(1B) to 19(1E) of the Planning and Compulsory Purchase Act 2004.’ NPPF (2019) paragraph 20 states:*

“Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision³ for:

(a) housing (including affordable housing), employment, retail, leisure and other commercial development;

(b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

(c) community facilities (such as health, education and cultural infrastructure); and

(d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation”.

- 3.1.2 NPPF (2019) paragraphs 21 and 22 state plans should include strategic policies to cover relevant cross-boundary issues (para 21) and that plans should look ahead a minimum of 15 years from adoption, to take account of long term requirements and opportunities (para 22).
- 3.1.3 The NPPF also highlights the importance of joint working to meet development requirements that cannot be wholly met within a single local planning area – for instance, because of a lack of physical capacity or because to do so may cause significant harm to the principles and policies of the NPPF. This is particularly relevant to the National Park.
- 3.1.4 The Strategic Matters for the Dartmoor National Park Local Plan review are described in section 6, below.

4 Signatories to the Statement of Common Ground

- 4.1.1 The following partners are signatories to this Statement of Common Ground. The particular matters relevant to each Authority are noted in Appendix 2.
- Devon County Council
 - Mid Devon District Council
 - South Hams District Council
 - Teignbridge District Council
 - West Devon Borough Council
 - Exeter City Council
 - Plymouth City Council
 - Torbay Council
- 4.1.2 Dartmoor National Park is located wholly within Devon County, and is split between Teignbridge District Council, South Hams District Council, West Devon Borough Council, and a small part of Mid Devon District Council. These Authorities are therefore important partners for the preparation of the Local Plan.
- 4.1.3 Plymouth City Council, Torbay Council and Exeter City Councils are nearby Authorities which are responsible for significant growth areas that will have important implications for the National Park, and as such are also important partners for the preparation of the Local Plan.

5 Other Duty to co-operate partners and additional signatories

5.1.1 The other bodies subject to the Duty to Co-operate are listed in the legislation or Guidance as:

- the Environment Agency
- Historic England (the Historic Buildings and Monuments Commission)
- Natural England
- the Civil Aviation Authority
- Homes England (formerly the Homes and Communities Agency)
- each Clinical Commissioning Group established under section 14D of the National Health Service Act 2006
- the National Health Service Commissioning Board
- the Office of Rail and Road (formerly the Office of Rail Regulation)
- each Integrated Transport Authority
- each Highway Authority within the meaning of section 1 of the Highways Act 1980 (including the Secretary of State, where the Secretary of State is the highways authority)
- the Aggregate Working Party
- the Mayor of London
- Transport for London
- the Marine Management Organisation

5.1.2 Duty to co-operate partners are not necessarily signatories to this Statement of Common Ground, but the statement is sent to them and they have the opportunity to confirm the accuracy of the Statement. NPPG states ‘additional signatories will be those bodies who have a role in the matters covered in a statement of common ground, and with whom an authority needs to cooperate in order to plan for these matters’.

5.1.3 A number of these organisations are not considered relevant to the Dartmoor National Park Local Plan, namely the Mayor of London, or Transport for London. Dartmoor does not have a coastline and no strategic matters for co-operation with the Marine Management Organisation have been identified.

5.1.4 Natural England is a non-departmental body responsible for ensuring that England’s natural environment is protected and improved, including by identifying and overseeing SSSIs and SACs. Two matters related to Dartmoor’s SACs in which Natural England have a specific role are identified which justifies their inclusion as an ‘additional signatory’ to this statement of common ground. These matters are:

1. The recreational impact of housing development on the National Park’s special qualities, including its Special Areas of Conservation (SACs)
2. The preparation of guidance for the South Hams SAC and specifically the greater horseshoe bats for which the site is in part designated

5.1.5 The South West Aggregate Working Party (SWAWP) is an ‘additional signatory’ with regard to the Minerals Plan. Cornwall Council can be relevant in respect of strategic minerals provision, and is engaged through the SWAWP. Local Enterprise Partnerships (LEPs) and Local Nature Partnerships (LNPs) are not subject to the

requirements of the duty to cooperate, but local planning authorities must cooperate with them and have regard to their activities when they are preparing their Local Plans, so long as those activities are relevant to local plan making. DNPA is actively involved in working with both the Heart of the South West LEP and the Devon Nature Partnership on areas of mutual interest, but they do not have a specific role in the matters identified within this Statement of Common Ground.

- 5.1.6 A much wider range of bodies, not covered by the Duty to Co-operate, have an interest in the development of the Local Plan. Details of how DNPA engages with them are set out in the Statement of Community Involvement.

6 Strategic Matters for Co-operation

- 6.1.1 Dartmoor National Park Authority has undertaken a review of the strategic matters where co-operation may be required during the preparation of the Local Plan. This has been informed by the statutory purposes and duty of the National Park along with the Devon-wide Duty to Co-operate Protocol.
- 6.1.2 The table in **Appendix 1** lists the strategic matters and provides an assessment of those where co-operation is required. **Appendix 2** provides a summary of which topics are relevant to each of the Duty to Co-operate partners.
- 6.1.3 In summary, the key strategic matters we have identified are:
- Conserving and enhancing the **natural beauty and cultural heritage** of the National Park and its setting (including landscape character and tranquillity);
 - Conserving and enhancing **biodiversity** (including ecological and green infrastructure networks);
 - The **spatial strategy** for managing development in the National Park and surrounding areas;
 - The delivery of new **homes**, including affordable homes, pitches for Gypsies and travellers and the needs of an ageing population including residential care;
 - Support for the **rural economy** including the agricultural and forestry sectors and the promotion of sustainable **tourism**;
 - The sustainable management of **recreation** and associated infrastructure, with regard to demand arising from development in areas surrounding the National Park;
 - Provision of **community services** and **infrastructure** required to support sustainable development in Dartmoor (including education, health, transport, telecommunications, flood risk management) where compatible with National Park purposes; and
 - The sustainable management of **waste** and **minerals** development, bearing in mind the status and purposes of the National Park.
- 6.1.4 The Strategic Environmental Assessment / Habitats Regulations Assessment screening and scoping was also used to inform the strategic issues for co-operation. This did not identify any new issues, but highlighted in particular the cross-boundary issues arising from predicted increases in recreation arising from planned growth in the region, and the potential effects on Dartmoor's environment (including SACs) and local communities. This is considered in more detail in section

7.5. Other evidence-based studies were also used to inform discussion on strategic matters as preparation of the Local Plan progressed.

7 Strategic Priorities

7.1.1 The following topics have been identified as the emerging strategic priorities for the Local Plan, and an Issues Consultation was carried out on these topics during October 2016 to January 2017:

7.2 *National Park Purposes, Natural and Historic Environment*

7.2.1 The protected status of the National Park and the great weight given to this in national planning policy is a significant factor in the development of the local plan, and cross-boundary discussions regarding the scale and distribution of development. National Park status and statutory purposes constrain the scale and type of development that is appropriate within the National Park, meaning that this needs to be accommodated in adjoining areas. Local Planning Authorities have a duty under section 62 of the Environment Act 1995 to have regard to National Park purposes when coming to decisions or carrying out their duties which includes potential impacts on the setting of the National Park or historic environment designations from development outside the National Park.

7.2.2 The Environment section of the draft Local Plan considers the Natural and Historic environment, identifying the most appropriate policy approaches to protecting Dartmoor's nationally and internationally important landscapes, cultural heritage, biodiversity and water environment. Consideration of the historic environment will require co-operation between DCC and Dartmoor National Park Authority. Paragraph 187 of the NPPF sets out that local planning authorities should maintain or have access to a historic environment record. Effective partnership working between DCC and DNPA on evidence sharing enables the maintenance of a single Historic Environment Record which improves consistency of data across the area.

7.2.3 Strategic Policy 2.1 seeks to ensure development in the National Park respects Dartmoor's landscape character. Evidence has been prepared which is consistent with the overarching and adjoining Landscape Character Assessments. This area of policy is largely unchanged.

7.2.4 Strategic Policy 2.1 also requires the Authority to seek to ensure that proposals coming forward outside the National Park, in its landscape setting, respects Dartmoor's landscape character. Reflecting our existing working relationship, this puts a requirement on the Authority to work with its neighbouring County, Unitary and District Authorities and ensure that due regard is given to National Park purposes under Section 62 of the Environment Act.

7.2.5 Dartmoor National Park contains extensive habitats of international, national, regional and local importance. Habitats and ecological networks cross boundaries and co-operation is needed to protect and enhance healthy, functioning ecosystems. There are opportunities to strengthen connectivity between habitats across boundaries, guided by Living Dartmoor (the National Park biodiversity strategy) and as part of green infrastructure networks. Living Dartmoor is developed

from the Strategic Nature Areas of the South West Nature Map and is consistent with neighbouring Authorities' identified cross-boundary habitat links. Strategic Policy 2.2 and its supporting text present a stronger emphasis on local natural networks (which incorporates green and blue infrastructure) and the value of cross-boundary connectivity.

- 7.2.6 The Authority identified the three European sites (Special Areas of Conservation) on Dartmoor (the Dartmoor SAC, South Hams SAC and South Dartmoor Woods SAC) as a strategic matter where co-operation is required regarding potential impacts on the SACs. The Authority has been working with Devon County Council, South Hams District Council, Teignbridge District Council and Torbay Council, in association with Natural England, on the preparation of guidance for the South Hams SAC and specifically the greater horseshoe bats for which the site is in part designated. This aims to ensure a consistent approach amongst the authorities in relation to the SAC, to ensure that development plans (including the Dartmoor National Park Local Plan) and planning decisions, meet requirements relating to the protection of the SAC. The guidance was consulted on as a Supplementary Planning Document (SPD) during Spring 2018. It is currently being progressed as guidance by each of the Authorities it affects.
- 7.2.7 Strategic Policy 2.2 seeks to ensure that new development sustains and enhances Dartmoor's designated and priority habitats and species, and the ecological networks which support them. Following the Regulation 18 consultation, DNPA has amended the Local Plan to include specific reference to the South Hams SAC, and particularly its importance for Greater horseshoe bats. If there is potential for development to have a likely significant effect on the SAC's greater horseshoe bat population, a Habitats Regulations Assessment (HRA) should be carried out. The Local Plan policies map and Map 2.1 have been amended to show the greater horseshoe bat [flyways and sustenance consultation](#) zones. Following the Habitats Regulations Assessment, and advice from Natural England, the draft Local Plan allocations also identify where further HRA and detailed bat surveys will be required.
- 7.2.8 The draft Local Plan has also been amended to reflect the Government's recent proposals on biodiversity net gain and the Natural Environment Topic Paper 1 sets out the evidence to support the approach taken. The policy recognises that off-site biodiversity enhancement should occur where it is most environmentally beneficial and this should not be limited by administrative boundaries.

7.3 Spatial Strategy

- 7.3.1 The draft Local Plan sets out the spatial strategy which describes where different types of development are acceptable in different areas of the National Park. It aims for most new development, such as housing and new business premises, to go in the 8 largest towns and villages. There is then more of a focus on local needs housing and expansion of existing businesses in smaller villages, which are split into two categories to reflect their function and ability to support development both in the context of infrastructure, and environmental effects. Outside of these towns and villages opportunities for new development are more limited, and focussed on farming or other rural activities and development which need to be in the open

countryside. DNPA has also taken into account housing, employment, services, facilities and other infrastructure outside of the National Park in considering the spatial strategy.

- 7.3.2 DNPA has worked with adjoining authorities to ensure a consistent policy approach for settlements / parishes which are split between two Local Plan areas or closely linked in terms of role and function. These settlements are Yelverton (WDBC), South Brent (SHDC), Ashburton and Buckfastleigh (TDC) and Cheriton Bishop (MDDC).
- 7.3.3 In relation to Yelverton, South Brent, Ashburton and Buckfastleigh, the settlements fall within DNPA although the parishes themselves are split, and the spatial strategy for the settlements is set by the Local Plan policies. All four settlements are identified as Local Centres in Strategic Policy 1.4 Spatial Strategy where development intended to serve the needs of the settlement and its rural hinterland will be acceptable in principle including to meet identified local housing needs; maintain and improve employment development where appropriate opportunities exist; and maintain or enhance a range of services which serve the settlement and its wider rural hinterland. Sites are allocated in these settlements. Strategic Policy 3.1 sets out the housing need required to support residential development in these settlements will be derived from the entire parish and the adjoining parishes which are wholly or substantially within the National Park.
- 7.3.4 The majority of the settlement of Cheriton Bishop is outside the National Park but there is a small area south of the A30 which is within the National Park. The policy approach is consistent. The MDDC Submission draft Local Plan Policy S13 Villages identifies Cheriton Bishop as a rural settlement suitable for limited development including small scale housing, employment, tourism and leisure; services and facilities serving the locality; and other limited development which enhances community vitality or meets a local social or economic need. This is consistent with the draft Dartmoor National Park Local Plan Strategic Policy 1.4 Spatial Strategy which identifies Cheriton Cross/ Bishop as a Rural Settlement where development intended to meet the needs of the settlement and its parish will be acceptable in principle including meeting identified local housing needs; opportunities for small scale employment development; and to maintain or enhance a range of services and facilities which serve the settlement. Strategic Policy 3.1 sets out the housing need required to support residential development in this settlement will be derived from the entire parish and the adjoining rural parishes which are wholly or substantially within the National Park.

7.4 *Housing*

- 7.4.1 The 2019 NPPF refers to National Parks in paragraph 172 where it states great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited. It does not however exclude National Park Authorities from other requirements,

including those relating to the provision of housing which are set out in Section 5: Delivering a sufficient supply of homes. The requirements in this section provide the underpinning framework for the housing policies in Local Plans, including in paragraphs 77 to 79, for its delivery in rural communities.

- 7.5 The National Parks Circular 2010 requires that in furthering their statutory purposes the Parks give sufficient weight to socio-economic interests to fulfil their duty to sustain strong rural communities. This requires that they provide clear and consistent advice on what are acceptable forms of development. It states that:

Para 78. The Authorities have an important role to play as planning authorities in the delivery of affordable housing. Through their Local Development Frameworks they should include policies that pro-actively respond to local housing needs. The Government recognises that the Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them. The expectation is that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services.

Para 79. The Government expects the Authorities to maintain a focus on affordable housing and to work with local authorities and other agencies to ensure that the needs of local communities in the Parks are met and that affordable housing remains so in the longer term.

- 7.5.1 The Circular remains the extant government position. This position has been reinforced recently by the exclusion of National Parks from the Standard Methodology for calculating housing needs. This confirms that government still considers National Parks to occupy a unique position as Local Planning Authorities in respect of housing supply.
- 7.5.2 This national policy context forms the foundation for the Housing Strategy in the Local Plan. This strategy is to seek to meet the identified local affordable housing need in the National Park, in those communities where it arises, and to do so with a mix of market housing that itself is meeting local need and responding to the demographic trends identified. But that the National Park does not seek to influence the affordability of housing by significantly increasing supply, nor is it appropriate for it to meet needs arising from outside of its area.
- 7.5.3 There are four separate Housing Authorities covering Dartmoor. The National Park sits within two Housing Market Areas (HMAs) – the Plymouth HMA which includes the parts of West Devon and South Hams inside the National Park, and the Exeter HMA which includes the parts of Teignbridge and Mid Devon inside the National Park. The scale and distribution of housing across the Housing Market Areas is an important element of Duty to Co-operate discussions. DNPA has worked together with its partner authorities within the respective HMAs to understand the housing needs of the National Park within the context of the two HMAs. The revised NPPF (2018) introduced a standard methodology for assessing housing need. There is no methodology for National Parks but instead the Authority “*may continue to identify a housing need figure using a method determined locally, but in doing so will need to consider the best available information on anticipated changes in households as well as local affordability levels.*” (Reference ID: 2a-014-20190220)
- 7.5.4 Both HMAs have joint / strategic plans in preparation outside the National Park. DNPA was invited to consider joint plan making arrangements but, in the context of the special purpose of the National Park, the Authority took the decision to produce a standalone Local Plan for the National Park. The Plymouth and South West

Devon Joint Local Plan was adopted by the constituent authorities in March 2019 and covers the administrative areas of Plymouth City, South Hams District and West Devon Borough. DNPA responded to the draft Joint Local Plan and appeared at the Examination hearings. The Greater Exeter Strategic Plan (GESP) is not as advanced, with the draft Plan timetabled for 2019, although this timetable is under review. DNPA has been involved in discussions at officer level regarding the scale and distribution of housing and also the Habitats Regulations Assessment of the strategic site allocations. There has also been extensive joint evidence gathering and an ongoing dialogue at officer level.

- 7.5.5 The policy approach to National Parks and their statutory purposes sets out that the National Park is not generally a suitable location for unfettered market housing development; a stance established by the 2010 Government Circular and Vision for National Parks and the Broads. Dartmoor National Park's Local Plan policies therefore facilitate housing delivery in order to support local needs, subject to the landscape capacity to do so and the wider objectives of the National Park. Levels of need in the National Park are small compared to the overall housing needs of the HMAs. Importantly the NPPF also notes "*the scale and extent of development within these designated areas should be limited*" (para 172).

Housing delivery

- 7.5.6 The Dartmoor Local Plan continues the Authority's established local needs-led approach to housing delivery. However this has been developed at a point of flux in national policy in assessing housing need for plan-making purposes. The Authorities within the Plymouth and Exeter HMAs, which cover the National Park, have worked collaboratively to identify need, and development plans which meet the need in such a way as it respects Dartmoor's National Park status and the great weight to be applied to that in planning new development.

Plymouth HMA

- 7.5.7 The adopted Joint Local Plan (JLP) covers the city of Plymouth, and the areas of South Hams and West Devon which lie outside the National Park. The housing need for the HMA is met, largely through the JLP, but also taking into account an allowance of 600 dwellings over the JLP plan-period, which is expected to be delivered within the National Park. This figure was derived before the review of the Dartmoor Local Plan started, and is based upon the historic level of delivery within the South Hams and West Devon parts of the National Park. Within these areas, sites are allocated in Local Centres currently, and in the draft Local Plan, to meet locally identified affordable housing need, including an element of cross subsidy on sites to support delivery and create balanced communities. The overall figure for indicative housing delivery has in the draft Dartmoor Plan risen from 50 per year, to 65 per year, across the National Park, meaning that there will be likely a slightly higher number than anticipated arising from the Dartmoor 'allowance'.
- 7.5.8 The JLP Authorities (Plymouth City Council, West Devon Borough Council and South Hams District Council) made representations at the Regulation 18 Stage of the Dartmoor Local Plan, setting out that they believed that the local plan should set out a housing requirement figure in order to provide certainty that the 'Dartmoor Allowance' set out in the Plymouth and South West Devon Joint Local Plan would

be delivered, and would provide a clearer basis for setting out a housing trajectory, a 5 Year Land Supply, and monitoring housing delivery to ensure that the needs of the HMA are being met in full. Discussions have been undertaken to explore this issue in more depth, and DNPA recognises that the JLP Authorities would favour greater commitment to the delivery of the figure which is expressed in the Dartmoor Local Plan as an indicative housing delivery figure.

[7.5.9](#) DNPA considers that the Dartmoor allowance is, in the HMA context, a small amount of housing. DNPA maintains that the approach taken is sound in the National Park context, and has confidence in the delivery of housing to meet identified needs within the South Hams and West Devon parts of the National Park. The key concerns of both DNPA and the JLP Authorities are to ensure that housing delivery takes place as set out in the JLP and the Dartmoor Local Plan.

~~[7.5.97.5.10](#)~~ ~~Therefore, i~~n order to ensure that the Dartmoor Allowance is delivered in full over the plan period, DNPA commits to setting out a clear understanding of housing land supply and delivery, ~~and a detailed monitoring and governance process in partnership with the JLP Authorities, which is described~~ in the revised Housing Topic Paper. ~~Within a further Monitoring and Governance Topic Paper DNPA has set out. This sets out that if a formal framework, which describes how if~~ monitoring indicates clear under-delivery within these parts of the National Park such that the Dartmoor Allowance and local affordable housing need is not being met, and such that any under delivery impacts upon the meeting of need across the HMA, this may necessarily lead to a review in whole or part of the plan. ~~This Topic Paper has been prepared with and agreed by the JLP Authorities.~~

Exeter HMA

~~[7.5.107.5.11](#)~~ Teignbridge and Mid Devon are working with East Devon and Exeter to prepare the Greater Exeter Strategic Plan as a statutory joint local plan. This will provide the overarching strategy for the constituent local planning authorities including the overall level and distribution of housing. Housing provision within Greater Exeter will include strategic sites allocated within the GESP itself, and other housing sites allocated in subsequent local plans prepared by the individual councils based on strategic guidance provided by the GESP. Teignbridge has commenced an update of the Teignbridge Local Plan. The GESP is currently considering housing need on the basis of the standard methodology, the results of which therefore include an element of need arising from household growth within the Dartmoor National Park portion of the Exeter HMA. The GESP authorities agree that any provision within the Exeter HMA element of Dartmoor would be designed to meet local Dartmoor need, using DNPA's locally determined methodology. In preparing the GESP, the Greater Exeter authorities will consider to what extent this provision should be taken into account within the overall GESP housing targets.

Key issues for housing

~~[7.5.117.5.12](#)~~ In the Dartmoor National Park Local Plan review key issues for housing are: understanding local affordable housing need, development viability (at a strategic and site level), self-build/custom build housing, conversions and agricultural dwellings. DNPA has worked closely with district housing officers to inform the

policy approach to these issues. This has included housing policy meetings and attendance at the viability workshop. DNPA has a Joint Advisory Committee (JAC) for housing on Dartmoor which has DNPA, Local Housing Authority membership at an officer and Member level, as well as attendance of Housing Enablers and Homes England. Officers from the districts attended the consultation events on housing held during the Regulation 18 consultation.

~~7.5.127~~ [5.13](#) Strategic Policy 3.1 describes the Local Plan indicative housing delivery figure for Dartmoor. Further detail on the rationale behind this approach is set out in the supporting text, and in more detail in the Housing Topic Paper and evidence gathered jointly with relevant duty to cooperate partners. The distribution of this figure is set out broadly in the Local Plan, in respect of the settlement hierarchy, beyond this the distribution is responsive to local needs in line with the overarching strategy.

~~7.5.137~~ [5.14](#) DNPA has also worked with Devon County Council and district councils on a joint Gypsy and Traveller Accommodation Assessment which indicated a very low level of need for Dartmoor National Park. Consequently, the Local Plan does not identify a pitch target for Gypsy and Traveller sites. Instead a criteria based policy is set out which enables suitable sites to come forward where a need is identified.

7.6 *Economy, Business and Leisure*

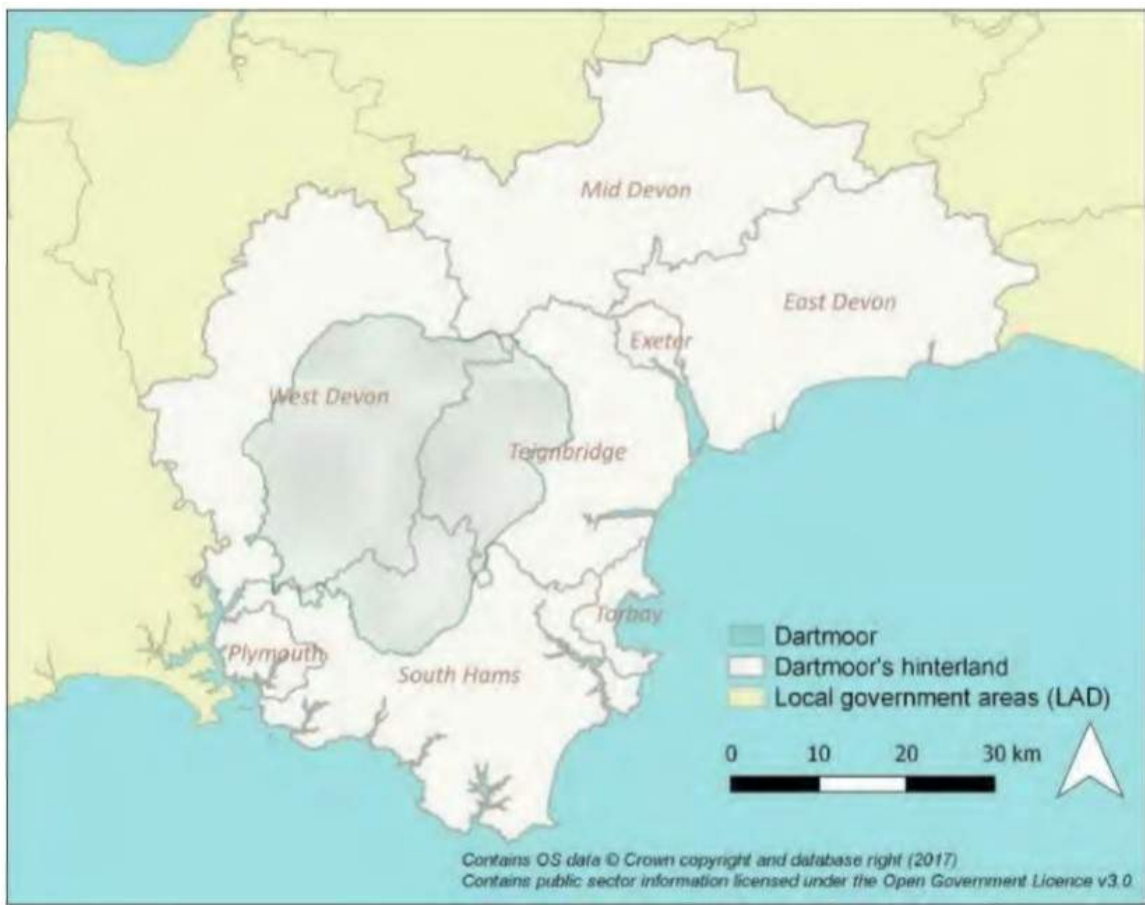
7.6.1 One of the key aims of the Local Plan review is to encourage a sustainable and diverse economic base for Dartmoor, which is both sensitive to the environment, and the needs of local communities. Key issues identified for the Local Plan include support for existing businesses to thrive and expand within the National Park, opportunities for new businesses appropriate for Dartmoor, tourism development and support for the agricultural sector, and home working. DNPA is not an economic development authority and so co-operation is required to help deliver strategic economic priorities in the National Park. As part of developing the evidence base for the economy policies in the Local Plan, DNPA held a workshop with key partners including officers from Devon County Council, South Hams, West Devon, and Teignbridge District Councils. This did not identify any specific cross-boundary issues.

7.6.2 Tourism and recreation are a major part of Dartmoor's economy, and rely heavily on Dartmoor's special qualities, beautiful landscape and picturesque towns and villages. Around 2.31 million people visit Dartmoor each year, spending around £139.5m (DNPA tourism statistics). Planning policy needs to carefully balance the protection of Dartmoor, with the need to respond to changing visitor trends and demands. The growth of surrounding areas will likely place additional pressures on Dartmoor such as more traffic on Dartmoor roads, or additional visitors to popular Dartmoor 'honey pot' sites. This can have an impact upon biodiversity, recreational infrastructure and/or tranquillity which are special qualities of the National Park. Cross-boundary co-operation will be important to consider these pressures and how they can best be managed.

7.6.3 The impact of large scale housing development close to the National Park has been subject of discussion in the context of the review of the National Park Management Plan. DNPA has worked with the South West Partnership for Economic and

Environmental Prosperity (SWEEP) at Exeter University to better understand the scale of growth around the National Park, and the impacts this may have in terms of increased recreational use. A report has been prepared which has been the subject of discussion with Duty to Co-operate partners.

7.6.4 The report highlights that Office of National Statistics population projections show that over the 25 years from 2014 to 2039, the overall population in the region (the eight local authority areas of East Devon District Council, Mid Devon District Council, Exeter City Council, Teignbridge District Council, West Devon Borough Council, South Hams District Council, Torbay Council and Plymouth Council) is projected to increase by 13% from around 1 million people in mid-2014 to 1.1 million in mid-2039. The areas predicted to see greatest growth are the main urban areas of Exeter and Plymouth and their associated new communities, as well as along the A30 and A38 corridors around Okehampton and Newton Abbot.



7.6.5 Modelling undertaken by Exeter University for the study estimates that Dartmoor currently receives around 7.8 million day visits over the course of a year. The majority of these (92%) come from the 8 neighbouring local authority areas, the remainder from the rest of England. Of all trips, 30% are 'new' visits, i.e. outdoor recreation would not take place anywhere else but in the National Park. When the additional growth predicted in the neighbouring local authorities is taken into account, the modelling suggests that by 2039, this will result in more than 870,000 additional annual visits to Dartmoor per year, a rise of around 12%. The study went on to consider the potential effects of this predicted increase in recreation, including the value of these visits and the health and wellbeing benefits, as well as the

potential costs in relation to path erosion, disturbance to wildlife and damage to habitats.

- 7.6.6 Given the majority of the recreational visits arise in the adjoining areas, DNPA considers that this is primarily an issue for adjoining Local Plans rather than the Dartmoor National Park Local Plan, and will be dealt with through the provision of green infrastructure, open space, sport and recreation facilities in the surrounding areas. Plans for managing the likely increase in recreational visits to Dartmoor, and mitigating any negative impacts, are being addressed through the review of the Dartmoor National Park Management Plan, which includes updating the Dartmoor Recreation Strategy. The Authority is continuing to work with neighbouring authorities through Duty to Co-operate discussions including by encouraging them to consider the implications of the likely increase in recreation in their local plans and to help DNPA develop a mitigation strategy to manage impacts into the future, including by supporting additional research if necessary.
- 7.6.7 Many of the areas where impacts are forecasted to increase are designated as or close to Special Areas of Conservation (SACs). The SWEEP Report identifies 12 species that stand as examples of species that might be vulnerable to disturbance from increased intensity of recreational activity. ~~For these 12 listed species, 4 are relevant for the Dartmoor SAC: the Greater Horseshoe Bat as an Annex II species is the primary reason for the designation of the site; Southern Damsel fly is also listed as an Annex II species; the Atlantic Salmon and Otter are listed as qualifying features (details in Appendix I of this report). The sensitivity of the Greater Horseshoe Bat to recreational impacts is identified as high and likely. For the Southern Damsel fly and the Atlantic Salmon, the sensitivities are considered to have possible, minor impacts from recreational activities; recreational impacts for the Otter were determined as unlikely for this species.~~
- 7.6.8 The research indicates potential impacts within the National Park, which results in some uncertainty around potential ~~in combination~~ effects on ~~the integrity of designated and non-designated habitat~~ Dartmoor's SACs from recreational disturbance arising from new development planned outside the Dartmoor Park boundary. Natural England has noted that the evidence is National Park wide, and not SAC specific, and has recognised an opportunity to work with DNPA to explore whether further research would be of merit, to understand the potential recreational impact arising from new development around the National Park. ~~therefore advises that in order to consider impacts and mitigation specifically on the SACs in more detail, and to identify a potential strategic response, further evidence is required. Taking a precautionary approach, it will be for adjoining plans and new development to ensure that there are no adverse effects on the integrity of the SACs, including in combination with the Dartmoor National Park Local Plan. These plans and any individual development proposals could require Appropriate Assessment, in order to assess and satisfy that their plans and projects (either alone or in combination) will not adversely affect the integrity of any European Site. Natural England did not comment on the HRA during the Regulation 18 consultation, but subsequently DNPA and NE have agreed that the SWEEP evidence is valid, but requires further detailed modelling specific to the SACs before any further conclusions could be drawn. The SWEEP report has also been made available to inform the HRA for the GESP, including cumulative effects and there is~~

~~in principal support to identify the evidence needed to inform the potential impacts, mitigation and solutions in more detail.~~

7.6.9 The Local Plan includes policies to support public access and recreation but to ensure that associated development does not negatively impact on the National Park's special qualities. This includes policies in the Environment section to protect the landscape character, wildlife and cultural heritage of the National Park. Strategic Policy 4.9 The Access Network seeks to ensure that development within or outside the National Park which is likely to increase harmful recreational pressure on Dartmoor's Special Qualities, particularly biodiversity, cultural heritage and the access network, is appropriately mitigated. Although much of the increase in recreation pressure is predicted to arise outside the National Park, the Local Plan also includes requirements for developments to support public open space and sports facilities (Strategic Policy 4.2) which will provide alternative green spaces and play areas for residents, and will help to minimise the impact of new housing development on more sensitive areas of the National Park.

7.6.10 The HRA for the Local Plan is informed by the study carried out to better understand the potential recreational impacts of new development on the Plymouth Sound and Tamar Estuaries European sites. That study identifies that part of Dartmoor National Park lies within the Zone of Influence (Zol) for recreational users potentially visiting the site.

7.6.11 As part of this work, the Tamar Estuaries Consultative Forum (TECF) has developed a Mitigation Strategy, which, via contributions from new residential development within the Zol, seeks to avoid likely significant effects upon the integrity of the sites. This Mitigation Strategy (the Recreation Mitigation Management Scheme Nov 2019¹) is costed based upon the level of growth planned for within the Plymouth, South Hams, West Devon and Cornwall areas; the small level of residential development anticipated within the Zol within Dartmoor National Park was not factored in. Subsequently this has been estimated at 16 homes per year.

7.6.12 The level of development within the National Park part of the Zol is negligible within the context of growth across the whole Zol. The potential impact of seeking financial contributions from new housing within the Dartmoor part of the Zol would be significant, in the context of the priorities for development within the National Park. On this basis the parties have agreed that whilst new residential development within the National Park would be within the Zol, it would not be required to make a financial contribution, as the contributions from the quantum of development elsewhere in the Zol will deliver the mitigation strategy.

7.6.13 This is agreed by the relevant Local Planning Authorities and Natural England, and a framework which will be used for the governance and monitoring of the mitigation of the Plymouth Sound SAC and Tamar Estuaries SPA in respect of Dartmoor National Park is set out in the Dartmoor Local Plan Monitoring and Governance Topic Paper.

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¹ <http://www.plymouth-mpa.uk/wp-content/uploads/2019/11/Recreation-Mitigation-and-Management-Scheme.pdf>

7.7 Sustainable Communities, Services and Infrastructure

- 7.7.1 Dartmoor is a challenging environment to support robust and vibrant communities. Isolated rural villages can rely heavily on the private car, young people can struggle to stay in their local communities with difficulties to access housing, education and employment, services and facilities face challenges to remain viable. The Sustainable Communities section of the draft Local Plan includes policies to enable communities to thrive and continue to be viable and sustainable places to live and work.
- 7.7.2 Many of the settlements on Dartmoor include local convenience stores, with some of the Local Centres having a wider range of shops. However the main retail offer is provided by the cities and larger settlements outside the National Park. Future retail requirements will be considered through district retail assessments and it is not anticipated that there will be any requirement for strategic retail development requiring cross-boundary co-operation.
- 7.7.3 Devon County Council (DCC) is the Local Education Authority and is responsible for the provision of schools and school places. DCC has identified capacity issues at primary and secondary schools which have catchments within the National Park. These include primary schools at Ashburton, Ilsington, Horrabridge, Meavy, South Tawton, and Widecombe-in-the-moor, and Okehampton secondary school, where investment may be needed over the plan period. DCC has an established policy approach for Section 106 contributions. Government funding to DCC does not cover new pupil places arising as a result of new development. The Local Plan recognises (including through viability assessment) that new development may attract a requirement to contribute towards the funding of educational facilities or transport. This does not require any further strategic co-operation and the need for developer contributions in respect of the locations identified above will be considered through development management on a site by site basis.

DCC evidence demonstrates that across its area affordable housing generates pupils, and therefore that it would request contributions for education from affordable housing where there is a lack of capacity. DNPA considers that within the National Park, tightly drawn local occupancy restrictions for affordable housing may mean that new affordable housing will not necessarily generate new pupil places at the same rate. Irrespective of this, DNPA recognises that DCC does not receive new pupil place funding from other sources. A significant portion of affordable housing in the National Park is delivered through funding from Homes England, which can only be used for the purpose of delivering affordable housing. Within the National Park there is a focus upon affordable housing delivery, and the Local Plan states clearly that this is a strategic priority. DNPA would note that where an LPA is a CIL charging authority (as is the case for many other LPAs within the County), and includes education on its Regulation 123 list, a social housing relief would be applied. The intention of this relief, applied nationally, is to ensure that affordable housing is not unduly burdened by additional planning obligations. DNPA would

therefore seek to apply the same principle through S106, particularly given the Local Plan's affordable housing focus.

- 7.7.4 Pupil forecasts for Ashburton Primary School identify that pupil numbers will exceed the school's current capacity and that the school, in its current form, will be unable to meet the need arising from additional development in Ashburton. The existing school site also has limited scope for extension and the development planned in the Dartmoor Local Plan is not on its own sufficient to fund the school's relocation.. DNPA is working closely with DCC and the local schools to enable local education needs to be met by creating additional capacity in the area. Discussions are ongoing.
- 7.7.5 The provision of facilities and services to support health and wellbeing will require co-operation including meeting the needs of an ageing population and the provision of residential care. It is important to establish a broad approach to housing suitable for older people which supports the draft Local Plan aim of supporting homes for a working age population, and limiting the increasing proportion of the population which is older people. The provision of green infrastructure may also support health and wellbeing. No specific strategic cross boundary issues requiring co-operation have been identified. However individual site specific proposals may come forward that require co-operation - these will be considered on a site by site basis.
- 7.7.6 Transport and communications is another area where co-operation is required including the approach to traffic management, freight transport, telecommunications and the provision of routes for more sustainable modes of transport including walking and cycling. Co-operation with Devon County Council as Highway Authority and Local Transport Authority, and Highways England as Strategic Highway Authority, currently takes place to cover these themes. The provision of infrastructure across boundaries for mobile phone coverage, and roll out of super-fast broadband will also need to be considered. Whilst the provision of infrastructure may include elements of partnership working on a case by case or project basis, there are currently no cross-boundary strategic issues. Policy 4.3 Enabling Sustainable Transport has been added to the draft Local Plan to encourage and enable sustainable travel by protecting, enhancing and providing new walking, cycling, and sustainable transport routes.
- 7.7.7 The management of flood risk will require co-operation with DCC as the lead local flood authority and the Environment Agency, including in particular any further revision or update of the evidence base to support the Local Plan including the Strategic Flood Risk Assessment and the Critical Drainage Areas identified on Dartmoor. No specific strategic cross boundary issues requiring co-operation have been identified. However, projects, or individual site specific proposals may come forward which require co-operation in relation to flood risk management - these will be considered on a site by site basis.
- 7.7.8 We do not usually see major infrastructure projects coming forward in Dartmoor National Park, however the Local Plan will consider the provision of infrastructure to support sustainable development. The preparation of the Infrastructure Delivery Plan (IDP) included co-operation with prescribed bodies and infrastructure providers but has not identified any strategic cross-boundary infrastructure

requirements required to support delivery of the Local Plan. The Regulation 18 consultation identified the capacity issue at Ashburton Primary School and the Regulation 19 Draft consultation will provide a further opportunity for prescribed bodies and providers to comment and inform any necessary update of the IDP.

7.8 Minerals, Waste and Energy

- 7.8.1 Dartmoor National Park Authority is the Mineral and Waste Planning Authority for the area. However, like many other National Park Authorities, the level of planning involvement in mineral matters within the Dartmoor National Park Authority does not justify a specialist minerals team or officer. The Authority therefore works closely with the adjoining mineral and waste planning authority, Devon County Council (DCC), in particular with regard to evidence and reporting. As such there will need to be ongoing co-operation with DCC and other Minerals Planning Authorities regarding the assessments of minerals demand and production, and assessments of waste arisings and disposal, bearing in mind National Park purposes. There are adequate reserves in the crushed rock aggregate landbank calculated for Devon together with adjoining authorities and National Park Authorities to provide for ongoing sales beyond the minimum number of years advised in the NPPF. No need has been identified for new sources of building stone beyond a strategic desire to provide for material which enables conservation of the National Park's distinctive character. The Plan includes Minerals Safeguarding Areas some of which are cross boundary and consistent with the approach of the Devon Minerals Plan. Dartmoor National Park is included with the Devon Local Aggregate Assessment, and a member of the South West Aggregates Working Party. No new strategic waste management facilities are needed within the National Park. Both the DCC Minerals Plan and the DCC Waste Plan are consistent with the approach set out in the Local Plan, that new larger scale development to meet minerals and waste needs will be met outside the National Park as far as is practical. There are therefore not considered to be any strategic cross-boundary minerals and waste issues. Any site specific issues will be dealt with on a case by case basis.
- 7.8.2 The Minerals, Waste and Energy section of the draft Local Plan includes discussion and policy for energy, and in particular renewable energy development in the National Park. There is already co-operation regarding policy advice and evidence on renewable energy developments through the Devon Landscape Policy Group. The Authority will continue to work with this group and neighbouring authorities to avoid impacts of renewable energy schemes on the special qualities and setting of the National Park. No specific strategic cross-boundary issues requiring co-operation in relation to energy policies for the Local Plan have been identified. Any site specific issues will be dealt with on a case by case basis.

8 Adjoining Local and Strategic Plans

- 8.1.1 The Plymouth and South West Devon Joint Local Plan was adopted in March 2019. It covers the administrative areas of Plymouth City, South Hams District and West Devon Borough and is a single strategic plan dealing with land use and

development. It sets out proposals that will balance the needs for housing, employment and the environment through to 2034.

- 8.1.2 The local authorities of East Devon, Exeter, Mid Devon and Teignbridge and Devon County Council are working together, engaging with stakeholders and communities, to prepare a Greater Exeter Strategic Plan (GESP). This formal statutory document will provide the overall spatial strategy and level of housing and employment land to be provided up to 2040.
- 8.1.3 Alongside the GESP, adjoining Local Planning Authorities are preparing their own Local Plans. The Mid Devon Local Plan Review 2013 -2033 is currently at examination. Teignbridge is at the early stages of a review of its adopted Local Plan.
- 8.1.4 DCC has an adopted Devon Minerals Plan (2017) and Devon Waste Plan (2014), which cover these matter outside the National Park. DNPA was a duty to co-operate partner in the preparation of the Plans.
- 8.1.5 At an early stage of these joint Plan processes there was discussion regarding the inclusion of Dartmoor National Park. A report (NPA/16/015) setting out the options was presented to the Dartmoor National Park Authority, which set out the rationale for not including the National Park within the Plymouth or Greater Exeter Strategic Plans and this was approved by members. The report proposed that instead, there would be positive engagement between the authorities in evidence gathering, and a clear position for each authority as a stakeholder in the preparation of the respective plans.

9 Governance arrangements and review of the cooperation process

- 9.1.1 There are a number of existing mechanisms to support co-operative working across boundaries. The following key principles illustrate how engagement and cross authority working is embedded in DNPA's approach to both plan-making and decision-taking:
 - The National Park Authority comprises members of each of the key local authorities which cover the National Park area.
 - The National Park Management Plan, whilst led by DNPA is a shared plan for a range of stakeholders including; prescribed bodies such as Natural England, Environment Agency, Historic England, as well as local authorities and a range of other partners.
 - Section 62 of the Environment Act 1995 makes it a duty for all relevant authorities to have regard to national park purposes when coming to decisions or carrying out their duties. This duty means the DNPA has long established relationships with government departments and agencies and a range of other local and public bodies in delivering national park purposes.
 - The Authority's remit differs from a local authority, DNPA is a Local Planning Authority but does not have statutory responsibilities in, for example; housing, economic development, environmental health, education, and highways, beyond its planning role. This means we work closely with these local authority

departments in both plan-making and decision-taking. This enables strong connection with other authorities at an officer level.

9.1.2 Officers continue to engage with other local authorities and agencies on the duty to co-operate around strategic issues for the area; this includes:

- Specific work on a duty to co-operate protocol led by Devon County Council to which DNPA is a signatory;
- Involvement with the Plymouth, West Devon and South Hams Joint Local Plan;
- Involvement with the Greater Exeter Strategic Plan (Teignbridge District Council, Mid Devon District Council, East Devon District Council, Exeter City Council and in partnership with Devon County Council);
- Involvement with adjoining and other relevant Local Planning Authorities in preparation of their Local Plans, including in particular Mid Devon, Teignbridge, Exeter and Torbay.
- Continued liaison with statutory bodies, for example with the Environment Agency, Natural England, Homes England, Defra and Historic England;
- Work with Devon County Council on economic development and infrastructure planning, and Minerals and Waste evidence base;
- Engagement with relevant Minerals and Waste Planning Authorities including through the Aggregate Working Party, and the Waste Technical Advisory Body;
- Involvement in cross-Devon landscape policy through the Devon Landscape Policy Group;
- The Authority is an active member of the Devon Local Nature Partnership (LNP);
- Engagement with the Local Enterprise Partnership (LEP) including joint work with Exmoor National Park on a Rural Productivity Plan;
- Neighbourhood Planning support - liaison between officers supporting Neighbourhood Plans through the South West Neighbourhood Plans Officers network to support consistency and good practice; and
- DNPA is an active member of the Devon Climate Emergency Response Group working to address the climate emergency across Devon.

9.1.3 A Devon-wide duty to co-operate protocol² was agreed in 2014 to guide strategic planning across local boundaries. Dartmoor National Park Authority is a signatory to the protocol, along with the other local authorities and other partners including the LEP, LNP and statutory environmental agencies (Natural England and Environment Agency).

9.1.4 The protocol sets out a strategic framework to enable efficient, coordinated and consistent co-operation on agreed matters. This does not preclude co-operation arrangements between organisations on specific spatial issues as is appropriate. Such relationships will specifically operate between Authorities covered by the protocol and other neighbouring Councils. The protocol also identifies the topic areas which may require specific co-operation between some, or all, of the organisations listed.

² <https://www.devon.gov.uk/planning/planning-policies/the-duty-to-co-operate>

10 Timetable

10.1.1 The timetable for the Local Plan review is set out below, along with an indication of how engagement with duty to co-operate partners will be undertaken.

Stage	Timeframe	Engagement
Evidence gathering	2016 onwards	Informal consultation Joint working on evidence base studies Officer liaison meetings
Issues	Winter 2016/17	Consultation
Options	Summer/Autumn 2017	Consultation Officer liaison meetings
First draft Local Plan (Reg 18 consultation)	Autumn/Winter 2018	Formal Consultation Follow up responses Officer liaison meetings
Revised draft Local Plan (Reg 19 consultation)	Autumn/Winter 2019	Formal consultation Follow up responses Officer liaison meetings
Submission and Examination	Spring 2020 onwards	Participate in Examination

Appendix 1: Assessment of Strategic Matters for Duty to Co-operate

Topic	Strategic Priorities for Dartmoor National Park Local Plan	DtC Partners	Evidence base	Assessment of co-operation
1. Population change/ demographic forecasting	To co-operate on assessing population change and demographics including housing need	DCC TDC WDBC SHDC MDDC PCC ECC	Edge Analytics Understanding Data	Yes. Topics 1 & 2 require cross-boundary co-operation regarding the need for and distribution of housing
2. Housing need and provision	To provide a co-ordinated approach to the distribution of housing across the housing market area, including joint studies where appropriate. To co-operate on meeting identified housing needs across the Housing Market Areas, including accommodating the needs arising from the National Park in adjoining authorities where appropriate.	DCC TDC WDBC SHDC MDDC PCC ECC HCA HA	SHMA (Plymouth) SHMA (Exeter) LAA Local Housing Needs Assessments Topic Paper 6: Housing Indirectly - Landscape Sensitivity Study	Yes. Topics 1 & 2 require cross-boundary co-operation regarding the need for and distribution of housing. See also No. 21 regarding Gypsy & Traveller provision and No. 19 health and wellbeing regarding the provision of housing needs for an ageing population.
3. Spatial strategy / settlement strategy	To ensure a consistent policy approach for settlements which are split between two Local Plan areas or closely linked in terms of role and function	TDC WDBC SHDC MDDC HA	Settlement strategy Topic Paper 4 Vision and Spatial Strategy	Yes. Co-operation is required regarding a number of settlements, particularly in relation to Yelverton (WDBC), Ashburton and Buckfastleigh (TDC) and Cheriton Bishop (MDDC)
4. Economic development and	To co-operate on strategic issues across functional economic areas including the protection of existing employment land,	DCC TDC WDBC	GESP EDNA ELR SHLAA	Yes. Support for key sectors and provision of an appropriate policy framework require cross-

Topic	Strategic Priorities for Dartmoor National Park Local Plan	DtC Partners	Evidence base	Assessment of co-operation
employment strategy	<p>support for key sectors including tourism and agriculture/forestry, and any proposals for strategic retail, leisure, industrial or other economic development.</p> <p>To work with the LEP to ensure that Local Plan policy framework and Strategic Economic Plan are consistent and mutually supportive.</p>	<p>SHDC MDDC PCC ECC HoSW LEP HA</p>	<p>HoSW Strategic Economic Plan, Growth Plan Dartmoor/Exmoor Rural Productivity Plan Topic Paper 8 Economy</p>	<p>boundary / agency co-operation</p>
5. Transport and communications	<p>To manage the impacts of transport and communications policy and provision of infrastructure across boundaries including the impact on the National Park of development in surrounding areas.</p> <p>To provide a consistent approach to traffic management, freight transport, telecommunications and the provision of routes for more sustainable modes of transport including walking and cycling.</p>	<p>DCC HoSW LEP ORR CAA HA</p>	<p>DCC LTP IDP Topic Paper 7 Transport</p>	<p>Yes. Transport policy and infrastructure provision including telecommunications and the promotion of sustainable transport require co-operation</p>

Topic	Strategic Priorities for Dartmoor National Park Local Plan	DtC Partners	Evidence base	Assessment of co-operation
6. Education / skills	To ensure the provision of necessary infrastructure for education and skills to support the needs of local communities and businesses	DCC HoSW LEP	DCC IDP	Yes. The provision of necessary educational facilities and infrastructure will be a matter for co-operation with DCC (see No.20). No specific strategic cross boundary issues requiring co-operation have been identified. However individual site specific proposals may come forward that require co-operation - these will be considered on a site by site basis.
7. Recreation, Leisure, culture and sport	To assess and avoid or mitigate impacts on the National Park from recreation and leisure pressure arising from housing development outside the National Park	DCC TDC WDBC SHDC MDDC PCC ECC TC	OSS District assessments and relevant strategies DNP Access and Recreation Strategy SWEEP Recreation Futures Topic Paper 8 Economy	Yes. Co-operation is needed to consider cross-boundary impacts of development leading to increased recreational pressure in the National Park. This could be the impacts of specific development proposals but also the cumulative impact of the scale of growth in surrounding areas given the growth ambitions of Plymouth and the Greater Exeter area.
8. Green infrastructure	To support climate change mitigation and adaptation measures across boundaries, including ecological networks and green infrastructure.	DCC TDC WDBC SHDC MDDC PCC ECC EA NE DLNP	IDP Living Dartmoor Topic Paper 1 Natural Environment	Yes. Cross-boundary co-operation on ecological networks and green infrastructure. See also Topic no.14.

Topic	Strategic Priorities for Dartmoor National Park Local Plan	DtC Partners	Evidence base	Assessment of co-operation
9. National Park purposes, special qualities and setting of the National Park	<p>To ensure that adjoining Local Plans include policies to protect designated areas, including the setting of the National Park and historic designations.</p> <p>To ensure that strategic allocations and planning proposals in adjoining areas are consistent with National Park statutory purposes through appropriate consultation, location, master-planning, design, and landscaping.</p>	All partners	<p>State of the Park Report</p> <p>National Park Management Plan</p> <p>Topic Paper 4 Vision and Spatial Strategy</p>	<p>Yes.</p> <p>Topic Nos. 10, 12 and 15 require co-operation as National Park status and statutory purposes constrain the scale and type of development that is appropriate within the National Park, meaning that this needs to be accommodated in adjoining areas. Local Planning Authorities have a duty under section 62 of the Environment Act 1995 to have regard to National Park purposes when coming to decisions or carrying out their duties which includes potential impacts on the setting of the National Park or historic environment designations from development outside the National Park</p>
10. Coastal and marine planning	Dartmoor National Park does not have a coastline and consequently does not have any direct responsibility for coastal and marine planning. The National Park covers the headwaters of several major river catchments and the majority of waterbodies are classified as 'good' or 'moderate' under the Water Framework Directive.	N/A	N/A	<p>No</p> <p>No strategic matters for co-operation have been identified relating to coastal and marine planning</p>

Topic	Strategic Priorities for Dartmoor National Park Local Plan	DtC Partners	Evidence base	Assessment of co-operation
11. Landscape	See Topic 9 above	DCC TDC WDBC SHDC MDDC PCC NE	National Park Management Plan Dartmoor Landscape Character Assessment Dartmoor Landscape Sensitivity Study Devon Landscape Character Assessment Devon Landscape Policy Group advice Topic Paper 1 Natural Environment	Yes. See Topic 9 above
12. Energy conservation, renewable energy and low carbon development	To support climate change mitigation and adaptation measures across boundaries, and to avoid impacts of renewable energy schemes on the special qualities and setting of the National Park.	DCC TDC WDBC SHDC MDDC	Topic Paper 1 Natural Environment Devon Landscape Policy Group Advice	No. This would be covered under Topic 9 above. No specific strategic cross-boundary issues requiring co-operation have been identified in relation to energy development. Any site specific issues will be dealt with on a case by case basis, for example, the Climate Emergency Response Group

Topic	Strategic Priorities for Dartmoor National Park Local Plan	DtC Partners	Evidence base	Assessment of co-operation
13. Biodiversity, biodiversity networks and ecosystem services	To ensure a consistent approach to the protection and enhancement of biodiversity across boundaries, including ecological networks and green infrastructure.	DCC TDC WDBC SHDC MDDC PCC TC NE DLNP	National Park Management Plan Topic Paper 1 Natural Environment Living Dartmoor	Yes. Habitats and ecological networks/green infrastructure cross boundaries and co-operation is needed to protect and enhance healthy, functioning ecosystems. There are opportunities to strengthen connectivity between habitats across boundaries, guided by Living Dartmoor (the National Park biodiversity strategy). Co-operation is also needed to ensure a consistent approach to statutory designations including SACs and protected species.
14. Heritage considerations	See Topic 9 above	DCC TDC WDBC SHDC MDDC HE	National Park Management Plan Topic Paper 2 Historic Environment Conservation Area Appraisals	Yes. See Topic 9 above. Consideration of the historic environment will require co-operation between DCC and DNPA in respect of HER. Potential cross boundary historic rail infrastructure (e.g. Wray Valley Trail, Drake's Trail)
15. Minerals	To ensure that a co-ordinated strategic approach is adopted to minerals and that strategic planning policies and proposals for minerals development are consistent with National Park purposes. Given the limited scope for minerals exploitation within Dartmoor National Park, DNPA and Devon County Council will work together to co-ordinate local assessments of aggregate production.	DCC	Devon Minerals Plan 2017 LAA (annual) Minerals research/topic papers (DCC) Topic Paper 5 Minerals and Waste Development	Yes. Dartmoor National Park Authority is the Minerals Planning Authority for the National Park and the local plan will include policies relating to minerals for the whole of Dartmoor National Park. As such there will need to be co-operation with DCC and other Minerals Planning Authorities regarding the assessments of demand and production, bearing in mind National Park purposes.

Topic	Strategic Priorities for Dartmoor National Park Local Plan	DtC Partners	Evidence base	Assessment of co-operation
16. Waste	To ensure that a co-ordinated strategic approach is adopted to waste and that strategic planning policies and proposals for waste management are consistent with National Park purposes.	DCC	Devon Waste Plan 2014 Topic Paper 5 Minerals and Waste Development	Yes. Dartmoor National Park Authority is the Waste Planning Authority for the National Park and the local plan will include policies relating to waste for the whole of Dartmoor National Park. As such there will need to be co-operation with DCC and other Waste Planning Authorities regarding the assessments of waste arisings and disposal, bearing in mind National Park purposes
17. Flood risk management	To manage flood risk particularly the cross-boundary upstream and downstream impacts of strategic planning and development	DCC EA	Dartmoor SFRA update Catchment Flood Management Plans	Yes. The preparation of the evidence base to support the Local Plan including the SFRA update and Critical Drainage Areas designated on Dartmoor will require co-operation with the Environment Agency and Devon County Council as the Lead Local Flood Authority. No specific strategic cross boundary issues requiring co-operation have been identified. However individual site specific proposals may come forward that require co-operation - these will be considered on a site by site basis.

Topic	Strategic Priorities for Dartmoor National Park Local Plan	DtC Partners	Evidence base	Assessment of co-operation
18. Health and wellbeing	To ensure a consistent approach to considering health and wellbeing in the development of planning and infrastructure related policy	DCC Clinical Commissioning Groups National Health Service Commissioning Board	IDP SA/SEA DLNP Naturally Healthy initiative Devon Joint Strategic Needs Assessment Devon Joint Health and Wellbeing Strategy 2016 Devon transforming Care Partnership Plan 2016	Yes. The provision of facilities and services to support health and wellbeing will require co-operation including meeting the needs of an ageing population and the provision of residential care. The provision of green infrastructure and the historic environment which may support health and wellbeing is covered in topics 9 and 14, and the impacts of increased recreational pressure arising from development are included in No.8. No specific strategic cross boundary issues requiring co-operation have been identified. However individual site specific proposals may come forward that require co-operation - these will be considered on a site by site basis.
19. Infrastructure planning, funding, delivery, phasing and implementation	To ensure adequate and effective infrastructure provision with regard to for example, transportation, telecommunications, energy, waste water, water quality, water supply, education and health facilities for the communities of the respective authorities consistent with NP purposes	DCC TDC WDBC SHDC MDDC PCC ECC EA NE HCA HA HoSW LEP DLNP	IDP	Yes. The preparation of the Infrastructure Development Plan will include co-operation with prescribed bodies and infrastructure providers to identify any infrastructure requirements required to support delivery of the Local Plan.

Topic	Strategic Priorities for Dartmoor National Park Local Plan	DtC Partners	Evidence base	Assessment of co-operation
20. Gypsy and traveller policy (particularly regarding accommodation of need and provision)	To ensure a consistent approach and evidence base for identification of the need for, and provision of, Gypsy & Traveller sites	DCC TDC WDBC SHDC MDDC	Devon GTAA assessment 2014 District and Joint Strategic Plan GTAAs Topic Paper 6 Housing	Yes. See Topic Nos 1 & 2.
21. Neighbourhood Plans	To provide a consistent approach to supporting Neighbourhood Planning in Parishes that span two Local Plan areas	TDC WDBC SHDC MDDC		No. Neighbourhood Plans are required to be in conformity with the strategic policies of Local Plans and as such it is not expected that any additional strategic cross-boundary issues will arise. A Protocol is being developed between DNPA and the District Authorities to ensure effective support for Neighbourhood Planning groups where Plans cross boundaries.
22. Procedural considerations	To support co-operation, best practice and efficiency in plan making	DCC TDC WDBC SHDC MDDC PCC ECC NE EA HE		No. This is not a cross boundary strategic planning issue. However DNPA will work with other prescribed bodies and partners to co-operate in relevant discussions regarding best practice and efficiency in Local Plan preparation. A report (NPA/16/015) setting out the rationale for not including Dartmoor National Park within the Plymouth or Greater Exeter Strategic Plans was approved by members.

Appendix 2: Summary table of Duty to Co-operate topics and relevant partners

Topic	DCC	TDC	WDBC	SHDC	MDDC	PCC	ECC	TC	EA	NE	HisE	HomE	HigE	CAA	CCGs/ NHSCB	ORR	HoSW LEP	DLNP
Population change/ demographic forecasting	X	X	X	X	X	X	X											
Housing need and provision	X	X	X	X	X	X	X					X	X					
Spatial strategy / settlement strategy	X	X	X	X	X								X					
Economic development and employment strategy	X	X	X	X	X	X	X						X				X	
Retail planning		X	X	X	X	X	X										X	
Transport	X												X	X		X	X	
Education / skills	X																X	
Recreation, leisure, culture and sport	X	X	X	X	X	X	X	X										
Green infrastructure	X	X	X	X	X	X	X	X	X	X								X
National Park purposes & special qualities	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

Topic	DCC	TDC	WDBC	SHDC	MDDC	PCC	ECC	TC	EA	NE	HisE	HomE	HigE	CAA	CCGs/ NHSCB	ORR	HoSW LEP	DLNP
Landscape	X	X	X	X	X	X				X								
Energy conservation, renewable energy and low carbon development	X	X	X	X	X													
Biodiversity, biodiversity networks and ecosystem services	X	X	X	X	X	X		X		X								X
Heritage considerations	X	X	X	X	X						X							
Minerals	X																	
Waste	X																	
Flood risk management	X								X									
Health and wellbeing	X														X			
Infrastructure planning	X	X	X	X	X	X	X		X	X		X	X				X	X

Topic	DCC	TDC	WDBC	SHDC	MDDC	PCC	ECC	TC	EA	NE	HisE	Home	HigE	CAA	CCGs/ NHSCB	ORR	HoSW LEP	DLNP
Gypsy and Traveller policy	X	X	X	X	X													
Neighbourhood Plans	X	X	X	X	X													
Procedural considerations	X	X	X	X	X	X	X		X	X	X							

Key:

DCC – Devon County Council (also Highways Authority, Education Authority and Lead Local Flood Authority)

WDBC – West Devon Borough Council

MDDC – Mid Devon District Council

ECC – Exeter City Council

EA – Environment Agency

HisE – Historic England

DLNP – Devon Local Nature Partnership

HigE –Highways England

SHDC – South Hams District Council

PCC – Plymouth City Council

TC – Torbay Council

NE – Natural England

Home –Homes England

HoSW LEP – Heart of the South West Local Enterprise Partnership

NHSCB – National Health Services Commissioning Board

CCGs – Clinical Commissioning Groups

ORR – Office of Rail and Road

TDC – Teignbridge District Council

CAA – Civil Aviation Authority



**DARTMOOR NATIONAL PARK AUTHORITY
LOCAL PLAN REVIEW 2020-2036**

**HABITATS REGULATIONS ASSESSMENT
(HRA) SCREENING &
APPROPRIATE ASSESSMENT
ADDENDUM**

February 2020

DARTMOOR NATIONAL PARK AUTHORITY LOCAL PLAN 2036 HABITATS REGULATIONS ASSESSMENT REPORT: ADDENDUM

Contents:

The Dartmoor Local Plan Review 2020-2036
Habitats Regulations Assessment (HRA) & Appropriate Assessment (AA)
Duty to Cooperate and Statements of Common Ground
This HRA Addendum Report
Recreational Disturbance on Dartmoor SAC & South Dartmoor Woods SAC
South Hams SAC & SPD
Plymouth Sound & Estuaries SAC/Tamar Complex SPA
Summary HRA Conclusions

The Dartmoor Local Plan Review 2020-2036

- 1 Dartmoor National Park Authority (DNPA) is undertaking a review¹ of the Dartmoor Local Plan. The emerging new Dartmoor Local Plan has been developed through continuing technical studies together with wide engagement and consultation. The preparation of the Local Plan has been informed by Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA). The DNPA commissioned independent specialist consultants Enfusion Ltd to undertake the statutory SA process and the HRA process for the Dartmoor Local Plan (DLP).
- 2 The DNPA invited comments on the key issues and evidence identified during winter 2016. During the autumn 2017, engagement events were held with Town/Parish Councils and local communities. The first draft of the new Local Plan was published for consultation in the winter 2018 (Regulation 18 stage) and the final draft Local Plan was published for further consultation during the autumn 2019 (Regulation 19 stage). Comments received will be submitted with the draft plan and its supporting evidence for independent examination in 2020.

Habitats Regulations Assessment (HRA) & Appropriate Assessment (AA)

- 3 The DNPA made available an Initial HRA Screening Report (July 2017) for wider public consultation alongside the SA Scoping Report. The HRA Screening & Appropriate Assessment Report (September 2018) that accompanied the draft Local Plan on Regulation 18 formal consultation was also made available on the website for wider public consultation. The statutory nature conservation body, Natural England, advised that they had no detailed comments at this stage. They indicated that the recreational disturbance issue is the greatest concern, but they were not clear about a solution at that time.
- 4 The HRA Screening & AA Report (June 2019) updated the assessment in line with the development of the final draft DNPLP (September 2019). It also took into account the recent Court of Justice of the European Union (CJEU) judgments that mean that it is not permissible to take account of measures intended to avoid or reduce the harmful effects of the plan or project on a European site at the screening stage.
- 5 The HRA screening identified that due to the small size and location of proposed new development in the DNPLP area, and the limited potential environmental pathways for impacts to the European sites outside of the National Park, there were no Likely

¹ <https://www.dartmoor.gov.uk/living-and-working/planning/planning-policy/local-plan-review>

Significant Effects (LSEs) for air quality changes, disturbance, changes to water quality or levels, or habitat loss/fragmentation – alone or in-combination with other plans, specifically the Plymouth & South West Joint Local Plan (P&SWJLP) and the emerging Greater Exeter Strategic Plan (GESP). The screening assessment identified uncertainty with regard to the potential for LSEs associated with air quality, disturbance and habitat loss or fragmentation on the three SACs located within the DNPA boundary (Dartmoor, South Dartmoor Woods, and South Hams SACs).

- 6 The appropriate assessment (AA) determined that the mitigation provided through the relevant DNPLP Policies such as Strategic Policy 2.2 Biodiversity; the small size, location and site-specific requirements of certain site allocations for project level HRAs; and the advice in the emerging updated guidance² for the South Hams SAC, are sufficient to ensure that significant adverse impacts on air quality and habitat loss or fragmentation can be avoided, alone or in-combination with other plans. The assessment also concluded that these mitigation measures were sufficient to ensure that significant adverse impacts arising from recreational disturbance can be avoided for the Dartmoor Local Plan alone.
- 7 Studies (SWEEP, September 2018) on the predicted recreational use of the National Park suggested that there could be significant adverse in-combination effects arising from recreational disturbance on the SACs within the Dartmoor boundary. This is due to the extensive new development planned around the outskirts of the National Park through the P&SW JLP and the emerging GESP. Whilst there is policy mitigation in the extant plans that should protect the European sites, the appropriate assessment suggested that the new evidence indicates that there is some uncertainty regarding in-combination effects on the integrity of the Dartmoor, South Dartmoor Woods and the South Hams SACs from recreational disturbance arising from new development planned outside the Dartmoor Park boundary.
- 8 In their formal response (November 2019) to the consultation on the final draft DNPLP and its accompanying HRA/AA report, NE made suggestions for strengthening draft DNPLP policies, including site allocations, and provided comments on the HRA that may be summarised, as follows:
 - NE does not concur with the conclusion that there could be significant adverse effects arising from recreational disturbance on Dartmoor SAC and South Dartmoor Woods SAC
 - NE advised that the need for project level surveys should be referred to in the relevant site-specific policies for proposed site allocations at Ashburton, Buckfastleigh and South Brent
 - NE advised that the HRA needs to address the impact of recreational disturbance arising from proposed housing within the plan area within the Zone of Influence for the Plymouth Sound & Estuaries SAC/Tamar Complex SPA. The Zone of Influence has been established through development of the adopted P&SWJLP.

Duty to Cooperate and Statements of Common Ground

- 9 The DNPA set out its approach to strategic cross-boundary matters in its Duty to Cooperate Scoping Report (May 2017) and various draft Statements of Common

² Interim Guidance agreed by local authorities & published October 2019 – please see <https://www.devon.gov.uk/planning/planning-policies/other-county-policy-and-guidance/south-hams-sac-guidance>

Ground³ that were consulted upon at both the Regulation 18 and Regulation 19 stages of plan-making. Discussions about the matters raised by Natural England continued through October to December 2019 between the DNPA, Natural England, Plymouth Council, South Hams District and West Devon Borough Councils. These culminated in a meeting on 27 January 2020 at which various key points were agreed and a potential way forward was proposed by the DNPA. Discussions remain ongoing but it was agreed – to prepare an addendum to the DNPA Local Plan HRA that reports the issues raised and resolutions proposed. It may be noted that comments on the DNPA HRA were received from NE and Teignbridge Council – no comments were received from the other neighbouring councils.

This HRA Addendum Report

- 10 The purpose of this HRA Addendum Report is to set out a summary of the plan-making and HRA processes undertaken and reported, together with an outline of the timeline and responses made to consultation stages. It seeks to explain the ongoing discussions between Natural England and the relevant neighbouring local authorities. The HRA Addendum addresses each of the three matters raised by NE at the plan-making Regulation 19 consultation stage. The Addendum builds upon the HRA Report published in autumn 2019 alongside the final draft DNPLP. It updates the situation and aims to compile the relevant information into one document to aid understanding and decision-making. It will be provided with other evidence and the final draft DNPLP for submission to the Secretary of State for independent examination.

Recreational Disturbance on Dartmoor SAC and South Dartmoor Woods SAC

- 11 The HRA (July 2019) of the final draft DNPLP (September 2019) reported that there could be significant adverse in-combination effects arising from recreational disturbance – due to the extensive new development planned around the outskirts of the National Park and as evidenced by the SWEEP Report (September 2019). The HRA suggested that it will be for these plans (P&SWJLP and the GESP) and the new development to ensure that there are no adverse effects on the integrity of the SACs, including in-combination with the DNPLP.
- 12 In response to the Regulation 19 consultation, NE advised that they do not concur with the conclusion that there could be significant adverse effects arising from recreational disturbance. NE advised that recreational impacts were not identified as a pressure or threat for the SACs as evidenced by the Site Improvement Plans (SIPs)⁴. It is agreed that the SIPs (2014) do not identify recreational impacts as a pressure or threat. The HRA included consideration of the characterisation of designated sites as set out in the Natura 2000 standard data forms (2014)⁵ and detailed in Appendix I of the HRA Report. Appendix I provides the information set out on the JNCC Data Forms (updated January 2016) including pressures and threats; summaries of key characteristics are provided in the main text of the HRA report at paragraph 3.5 with discussions regarding recreational pressures through paragraphs 3.22-3.33.

³ <https://www.dartmoor.gov.uk/living-and-working/planning/planning-policy/background-evidence/background-evidence-and-research/preparing-the-local-plan?a=1416789>

⁴ South Dartmoor Woods SIP222 and Dartmoor SIP054 – please see <http://publications.naturalengland.org.uk/category/5458594975711232>

⁵ <https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0030370.pdf>

- 13 Appendix I records that the JNCC data form for the South Dartmoor Woods SAC does not include recreation (GO1)⁶ or other human disturbance (GO5) as a high threat. For the Dartmoor SAC, 'other human intrusions & disturbances' (GO5) are listed as a high threat⁷; recreation (GO1) is not included as a high threat.
- 14 Recreational pressures arising from the extensive new development proposed around the boundary of the National Park had been identified at an early stage of engagement and plan-making. Such concerns continued through plan-making and the initial consultation stage at Regulation 18 for the emerging draft plan and its accompanying HRA/AA. At that time, Natural England advised that they considered that the recreational disturbance issue is the greatest concern, but they were not clear about a solution at that time. It is not clear whether this comment referred to all potential recreational pressures or just those associated with the South Hams SAC (and please see following section).
- 15 It is understood from informal discussions with NE that they consider that the SWEEP report deals with the whole of Dartmoor and is not specific to the Dartmoor and South Dartmoor woods SACs. Therefore, NE concluded that there is currently no evidence to show that there are likely significant (cumulative) effects from new development on the designated features of these two SACs. NE suggested that it would be useful to undertake a recreational impacts study including visitor surveys, and DNPA is in discussion with NE to consider whether this may be a broader (i.e. designated and non-designated habitat) study to ascertain the longer term implication of increased numbers of visitors and where they come from.
- 16 It had been assumed that NE and the neighbouring local authorities considered that there were sufficient mitigation measures in plan policies and site-specific allocations (adopted P&SWJLP, emerging GESP) to ensure no cumulative effects. It may be noted that the HRA/AA (updated 2018)⁸ of the P&SWJLP concluded that there will be no likely significant effect either alone or in combination with other plans or projects on the integrity of the designated European sites arising from the JLP. The HRA of the adopted JLP concluded that the recreational impacts on designated sites arising from planned residential development, either alone or in combination with other plans or projects needs to be addressed - and the draft SPD (November 2019)⁹ considers mitigation measures in respect of impacts on the Plymouth Sound & Estuaries SAC/SPA and the South Hams SAC, but not impacts on the Dartmoor & Dartmoor Woods SACs. The preparation of the GESP is still at an early stage but it may be noted that the European site sensitivity (April 2019)¹⁰ undertaken to inform the emerging HRA includes impact pathways for recreational impacts for the Dartmoor SAC (Salmon & Otter habitats linked to the SAC) and notes the need to evaluate recreational impacts with DNPA and Teignbridge Council.
- 17 The DNPA are confident in the research that was undertaken and the findings that are presented in the SWEEP report (September 2018). The studies used existing visitor information to model predicted future levels of recreational activities on Dartmoor taking into account the population projections from the surrounding new Local Plans. The studies identified key areas where path erosion could be a significant issue, and key habitats/species with areas where wildlife disturbance could be a significant issue.

⁶ The JNCC data form applies codes for different types of threats & pressures

⁷ <https://sac.jncc.gov.uk/site/UK0012929>

⁸ <https://www.plymouth.gov.uk/sites/default/files/UpdatedSustainabilityAppraisalHabitatsRegulationAssessment.pdf>

⁹ <https://www.plymouth.gov.uk/sites/default/files/JLPSPD2019.pdf>

¹⁰ Saunders, G. & Hoskin, R. (2019) Habitats Regulations Assessment and mitigation strategy for the Greater Exeter Strategic Plan European site sensitivity analysis. Unpublished report for the Greater Exeter Strategic Plan authorities

The research identified that detailed information on path erosion is limited; whilst there is comprehensive scientific literature on a wide range of impacts from recreational activities on wildlife disturbance, detailed science on threshold levels of recreation at which species incur disturbance is limited.

- 18 The DNPA has shared this research with NE and relevant neighbouring local authorities. The SWEEP report indicates where the key sensitivities and pressures might arise; other studies are ongoing, for example, those associated with the preparation of the GESP. DNPA also describes this issue in Topic paper No 1 Natural Environment¹¹ which links with the policy response in the Local Plan. DNPA is continuing to discuss these matters with NE and the relevant neighbouring local authorities as described in the Statement of Common Ground. It recognises at this stage that NE concludes there is not the evidence which would suggest there are recreational impacts in respect of the Dartmoor SACs, and therefore concludes no Likely Significant Effect, and will endeavour to consider broader investigation (beyond the requirements of HRA) in partnership with NE.
- 19 In conclusion, there are reasonable measures in place to investigate and evaluate concerns about any future cumulative recreational impacts arising on Dartmoor National Park from the extensive new development around its boundaries. This further investigation, considered alongside NE's view that there currently is no evidence of a Likely Significant Effect on the Dartmoor SACs means that mitigation is not currently required. The HRA of the draft DNPLP, including this HRA addendum, is relevant, valid and reflects the latest understanding and agreement.
- 20 There is policy mitigation in the extant plans that should protect the European sites on the basis of the current evidence of potential impacts. However, it will be for these plans and new development to ensure that there are no adverse effects on the integrity of the SACs, including in-combination with the DNPLP, taking into account any further evidence which may come forward in the future.

South Hams SAC & SPD

- 21 At the DNPLP Regulation 19 consultation stage, NE advised the need for project level surveys to be referred to in the relevant site-specific policies for proposed site allocations at Ashburton, Buckfastleigh and South Brent. The site allocations include a requirement for "*evidence to inform an appropriate assessment (Habitats Regulations) in order to establish that development of this site will have no adverse impact on the South Hams Special Area of Conservation*". This should be considered in conjunction with the approved South Hams SAC Guidance, and the further individual references in the published Site Briefs, which specifically advise where a survey may be required for development site. DNPA considers that this is sufficient guidance for developers to provide evidence to ensure that there are no adverse effects on the integrity of the SAC.

Plymouth Sound & Estuaries SAC/Tamar Complex SPA and JLP SPD

- 22 At the DNPLP Regulation 19 consultation stage, NE advised that the HRA needs to address the impact of recreational disturbance arising from proposed housing within the plan area on the Plymouth Sound & Estuaries SAC/Tamar Complex SPA. The JLP Authorities and Cornwall Council have, through the Tamar Estuaries Consultative Forum (TECF), commissioned evidence that has identified a Zone of Influence (ZoI)

¹¹ <https://www.dartmoor.gov.uk/living-and-working/business/planning-policy/background-evidence/background-evidence-and-research/topic-papers>

which includes the western and southern edges of Dartmoor National Park. Subsequently the JLP Authorities have prepared a draft SPD, which includes specific provisions on the Plymouth Sound & Estuaries European Marine Sites Recreation Plan (November 2019)¹² that was on public consultation until 6 January 2020.

- 23 The DNPA has expressed its concerns regarding the draft SPD for the JLP, in particular around engagement, and the evidence around the Zol and held a meeting with NE and the relevant neighbouring LPAs on 27 January 2020. Following the meeting, the JLP authorities will respond in writing to the DNPA's outstanding questions on the evidence base to order to inform the DNPA Members with regard to further decision and plan-making. The DNPA has agreed to prepare this HRA Addendum that explains the situation and references the evidence study including the Zol.
- 24 The JLP Authorities published a report in November 2019 on the Plymouth Sound and Estuaries EMS Recreation Mitigation and Management Scheme¹³ (The 'Mitigation Strategy') and it is understood that these studies informed the preparation of the draft P&SWJLP SPD. This document refers to a Zone of Influence of 12.3km of the boundaries of the European Marine Site (EMS) based on the zone from which 75% of coastal visitors live who visit the SAC/SPA. Accordingly, a package of mitigation measures was compiled in consultation with NE and includes developer contributions calculated for every net additional dwelling within the 12.3km Zol. This has been taken forward into the draft JLP SPD through policy DEV26 and with further guidance in Appendix 6.
- 25 The Mitigation Strategy proposed must be proportionate to the level of development coming forward within the Zol. It is important to note that the level of development anticipated in the Zol that is not located in Dartmoor National Park is sufficient to deliver the Mitigation Strategy – without additional contributions from the National Park. Thus, this has already recognised the very small level of development occurring within the National Park - and supports the strategic priorities of the Dartmoor Local Plan, in particular the provision of affordable housing to meet local needs.
- 26 The HRA screening stage of the HRA (June 2019 para 3.34) of the draft DNPLP considered the likelihood of environmental pathways and the potential for likely significant effects on water levels and water quality for the Plymouth Sound & Estuaries SAC/SPA. The boundaries of the SACs are some 3.5km from the nearest boundary of the Dartmoor National Park. It was considered that the level of development proposed in this part of the National Park was very small and therefore, there would be no Likely Significant Effects. This issue was not taken forward for further Appropriate Assessment.
- 27 The HRA screening also considered recreational disturbance for the Plymouth Sound & Estuaries SAC/SPA (HRA para 3.23). the screening stage concluded that the small amount of new development was proposed for the existing communities of Dartmoor such that it is unlikely that there will be significant increased access to the SAC/SPA and therefore, no LSEs alone or in-combination - and this issue was not taken for further appropriate assessment.
- 28 It is now understood that the studies undertaken for the JLP Authorities and Cornwall Council, have identified a 12.3km Zol for new development as part of the Mitigation Strategy (November 2019) being developed for the P&SWJLP, as described above. It

¹² <https://www.plymouth.gov.uk/spdconsultation2019>

¹³ <http://www.plymouth-mpa.uk/wp-content/uploads/2019/11/Recreation-Mitigation-and-Management-Scheme.pdf>

should be noted that there are outstanding detailed queries from the DNPA about the surveys and evidence reported – and these are being addressed by Plymouth City Council officers.

- 29 The level of development anticipated within the Zol where it lies within the Dartmoor National Park is very low; approximately 16 homes per year. In the context of the Local Plan strategy, a high proportion of these homes would be affordable housing, and therefore occupied by households already living and/or working in the area. On this basis the potential in combination effect of the Dartmoor Local Plan housing provision upon the SAC/SPA is negligible.
- 30 This HRA Addendum notes the additional information available through the evidence compiled for the Mitigation Strategy that informs the draft JLP SPD. The supporting evidence for the Mitigation Strategy does not include consideration of the small amount of new development within the National Park in its estimation of impacts or Strategy viability. Therefore, additional contributions are not necessary from within the National Park as the Mitigation Strategy is delivered without these additional negligible contributions. This also enables the strategic priorities of the Local Plan to be pursued without additional pressure upon development viability. This enables adjoining Authorities (and Natural England) to meet their duty to have regard to National Park purposes when coming to decisions or carrying out their activities relating to or affecting land in the National Park (section 11A of the 1949 Act and section 17A of the 1988 Act).
- 31 This HRA Addendum considers that although there are small sites allocated within Yelverton, Horrabridge and Mary Tavy, and a small anticipated amount of windfall development within the Zol, it is negligible in the context of growth within the whole Zol. Development inside the Zol and within the National Park will continue to be screened under HRA as necessary, on a case by case basis. Standing advice may be used for new residential units within the Zol. Furthermore it is considered that, given new residential development in the National Park is principally affordable housing restricted to local people, the increased recreational use/disturbance arising as a result is of a significantly lower likelihood. Having considered both of these points, any potential residual impact is mitigated through the Mitigation Strategy funded by development elsewhere in the Zol.
- 32 To ensure appropriate ongoing review, DNPA has prepared a Monitoring and Governance Topic Paper, which sets out a framework for the collective monitoring of development levels within the Zol, ensures monitoring of the implementation of the Mitigation Strategy, and describes a joint process of review should the circumstance described above change, meaning that this appropriate may need to be reviewed.

Summary HRA Conclusions

- 33 This HRA Addendum has reported the comments received from the nature conservation body, Natural England, and addressed the 3 key issues raised:
- Dartmoor & South Dartmoor Woods SAC – the HRA concludes no Likely Significant Effects in respect of cumulative impacts arising from the extensive new development proposed around the National Park boundary, but supports a broader study to understand impacts on other designated and non-designated habitat

- South Hams SAC – the DNPA consider that proposed policy wording and supporting guidance is appropriate to enable for applicants to provide evidence to ensure that there are no adverse effects on the SAC's integrity
 - Plymouth Sound & Estuaries SAC/Tamar Complex SPA and JLP SPD – the HRA has noted the new evidence, including the Zol, and considers that the extent of new development within the Zol is negligible and is for principally affordable housing. The strategic Mitigation Strategy is delivered without additional contributions from within the National Park part of the Zol, and therefore additional contributions towards mitigation are not required. This is agreed, but will be monitored under the framework set out in the Monitoring and Governance Topic Paper.
- 34 Strategic mitigation measures remain in place through the ongoing discussions between the DNPA, NE and the relevant neighbouring LPAs, and preparation of Statements of Common Ground.

DARTMOOR NATIONAL PARK AUTHORITY

6 March 2020

DARTMOOR NATIONAL PARK AUTHORITY CLIMATE ACTION PLANReport of the Chief Executive (National Park Officer) and the Forward Planning Officer**Recommendation: That Members:**

- (i) **Approve the draft Climate Action Plan and, in particular, the key actions identified for 2020/21 in table 1;**
- (ii) **Agree that the Climate Action Plan needs to be reviewed on an annual basis and note that there will be on-going resource implications (financial and staff);**
- (iii) **Note that the £50,000 earmarked in reserves to support action on climate change will be used to fund key actions in 2020/21. Any cost above this will be subject to separate Authority approval as there is no provision in the draft Revenue Budget for 2020/21 for further expenditure associated with the Climate Action Plan; and**
- (iv) **Agree that the Chair of the Authority and Chief Executive (National Park Officer) should highlight the need for an agreed carbon accounting framework to ensure consistency across both emissions and sequestration of carbon.**

1 Background

- 1.1 In July 2019 the Authority declared a climate and ecological emergency (NPA/19/020) and agreed to work towards the Authority (i.e. the organisation) being carbon neutral by 2025. The declaration was subject to the preparation of a detailed action plan (by March 2020) so that Members could consider the implications of becoming carbon neutral and the practicality of the 2025 target date. The Action Plan is attached to this report (see Appendix 1) and key actions summarised in this report.
- 1.2 Officers have developed the Action Plan in parallel with work at a county level to produce a Devon-wide Carbon Plan. Collaboration on the 'carbon agenda' is essential to share information, knowledge, pool resources and ensure that we take a co-ordinated approach.
- 1.3 We are also working as part of the National Park family with all English National Park Authorities looking to be carbon neutral by 2040 (or before) and a task and finish group has been established to develop a co-ordinated approach at both an organisation and National Park level. At the UK level we are exploring the potential to feed into the COP 26 conference that is being hosted in Glasgow and National Parks Partnerships are exploring the potential for a sponsorship arrangement for electric vehicles involving all 15 UK National Parks.

2 Carbon Footprint

Carbon Emissions

- 2.1 Dartmoor National Park Authority has been monitoring carbon emissions since 2009. We have used the methodology developed by Government and done this in parallel with the other nine National Parks in England. The guidance requires that emissions monitoring is structured within 'Scopes':

Scope 1	Direct emissions, for example from boilers and owned vehicles
Scope 2	Indirect emissions from the energy we purchase (e.g. electricity)
Scope 3	Other indirect emissions from activities such as business travel (not using Authority vehicles), good and services we buy (and sell), our investments (e.g. Pension Fund) and commuting by Members and staff

- 2.2 The carbon footprint is measured in terms of carbon dioxide equivalent (tCO_{2e}), this allows different greenhouse gases to be compared on a like for like basis relative to one unit of CO₂.
- 2.3 Compared to the 2009/10 baseline we have already achieved a 51.6% reduction in carbon emissions (scope 1 and 2). In 2009/10 we were responsible for 304.7 tCO_{2e}, in 2018/19 our scope 1 and 2 emissions were 157.1 tCO_{2e}.
- 2.4 Diesel (for our vehicle fleet) and purchased electricity account for 75% of our scope 1 and 2 emissions (based on 2018/19 figures). Electricity is the next biggest source of carbon emissions (accounting for 27% of scope 1 and 2 total emissions in 2018/19).
- 2.5 As part of the action plan process we have sought to calculate our scope 3 emissions (see above for definition). It is important to note that an organisation's scope 3 emissions will form part of another's scope 1 and 2 emissions. This means that there is the potential for double counting between organisations when monitoring. Scope 3 emissions are not easy to calculate and are not in the direct control of the Authority, but we think it is important to consider them as part of our overall footprint. From the calculations to-date we know scope 3 emissions to be at least 170 tCO_{2e} in 2018/19. This is not a complete figure as we have not been able to calculate emissions associated with all of the goods and services we procure and the goods that we sell. Staff and Member commuting is the most significant source of scope 3 emissions (account for 67% of total scope 3 emissions).

Carbon Accounts for DNPA land-holdings

- 2.6 In calculating our carbon footprint we have taken account of our buildings and premises but not factored in the impact of our land holdings. We have scoped this area of work and undertaken a basic analysis, but as outlined below there is a need for further work. This work is important as our scoping exercise indicates that the Authority could already be carbon positive (i.e through the land that we own and manage we sequester more carbon than we emit).

- 2.7 There is not an adopted national standard for developing carbon accounts for different habitats and land management options. We believe that this is a serious omission and one that needs to be addressed if there is to be a consistent approach to carbon accounting.
- 2.8 We have conducted a quick review of a number of approaches, but the values and assumptions made vary significantly reducing confidence in the figures. The most useful was as part of a natural capital account for RSPB nature reserves. The Authority has undertaken a basic baseline estimate of the carbon sequestered in our various land holdings (woodland, peatland, valley mires, acid grassland and bracken) using the RSPB approach, with values and assumptions that are most relevant to our land holdings.
- 2.9 Currently that baseline data does not include the other side of the balance sheet i.e. the amount of CO_{2e} emitted from activities to manage the land and this is necessary to give a meaningful figure. Our best and most accurate forecast would be for our own woodland where Authority staff manage the land with very little intervention and therefore the activity is already accounted for in our scope 1 and 2 footprint. Using the same assumptions that have been made in equivalent studies we could conclude that the carbon sequestered in our Wray Valley woodlands (71ha) alone, per annum, is potentially more than we emit through scope 1 and 2.
- 2.10 However, the professional view of officers is that more work needs to be done in this area to both 'ground truth' data and to establish an agreed accounting framework, in partnership with other organisations where possible. A priority action must be to undertake a more detailed assessment of our holdings to calculate both the estimated amount of carbon sequestered and the carbon emissions from current management so that we can balance the account and make informed decisions about future management which seeks to maximise the multiple benefits for biodiversity, carbon, water and other factors. This would be a useful study both for our own holding but for other land across our National Parks and supporting our work on the Environmental Land Management Scheme.

3 Action Planning

- 3.1 We have adopted a hierarchy of priorities:

- Be lean – actions to reduce demand (e.g. turn of lights, reduce need to travel)
- Be clean – actions to improve efficiency (e.g. energy efficient lighting)
- Be green – source from low carbon and renewable sources
- Offset – offset the impact of unavoidable emissions

- 3.2 The draft Climate Change Action Plan presents a series of potential actions which we have identified through consultation with staff and Members and input from our consultants. For each of these actions we have sought to undertake a cost benefit analysis that considers overall cost, potential emissions savings and potential financial savings. The analysis shows that achieving carbon neutrality by 2025 (for scope 1 and 2 emissions) is achievable subject to investment. Our proposed key actions for year 1 are summarised in Appendix 2.

- 3.3 The top priority action for 2020/21, in terms of reducing our carbon footprint, is to source renewable energy (specifically electricity) for our premises.
- 3.4 We can (through our existing broker) procure electricity via a green tariff using a Renewable Energy Guarantee of Origination (REGO). As noted in the Climate Change Action Plan (see appendix 1) there are concerns about the REGO model, notably that there could be mis-selling and that the model does not incentivise the required further investment in renewable energy production. An alternative to the REGO or green tariff option is to enter into a power Purchase Agreement (PPA). A PPA is a contract between a supplier and consumer of energy, it can set out how the electricity will be generated and the price it will be bought for. The advantage of the PPA is that it can provide direct investment in new renewable energy production – an audited and certified route. Our preference is to enter into a PPA and this is being actively explored by Devon County Council. The PPA option is not open to us at present due to the ongoing work addressing legal issues, financing etc. The recommendation is that we initially switch to a Green Tariff via our existing broker as from 1 October 2020 (first date that we can do this) and then enter into a PPA if this is pursued at a Devon level. If the PPA is not deemed suitable then we will report back to Members and consider direct procurement via a supplier that can guarantee purchase of renewable energy via their own infrastructure or Power Purchase Agreement.
- 3.5 Once we can guarantee that the electricity we are using is from renewable sources this unlocks the emissions benefits of switching to electric vehicles. A switch to electric vehicles would help us reduce the carbon emissions associated with the use of pool vehicles (75% of our total carbon footprint for scope 1 and 2). Switching before we can guarantee charging electric vehicles from renewable sources provides negligible benefits in terms of reducing carbon emissions especially if you factor in potential replacement batteries. We also have an issue in terms of the lack of availability of a 4 x 4 electric option and the current range of electric vehicles. In the interim we will weight CO₂ emissions in the procurement of replacement vehicles so that we can take steps to reduce our carbon footprint prior to a switch to electric.
- 3.6 As noted in paragraph 2.10, a detailed carbon account of our land estate that assess the net carbon footprint is another priority for 2020/21.
- 3.7 In terms of our Scope 3 emissions the most significant investment that the Authority makes is via the Local Government Pension Fund. This investment is managed on a collective basis by the Brunel Pension Partnership who have recently published a Five Point Plan to Build a Financial System Fit for a Carbon Zero Future. In summary, the Five Point Plan commits the Partnership to use its leverage to influence the businesses that it invests in to reduce climate risk and support the transition to renewable energies, energy efficiency and adaptation to climate change.

4 Financial Implications

- 4.1 At the Authority meeting in July 2020 Members approved the allocation of £50,000 from reserves to support our climate change work. The consultancy support that we have paid for to develop the Climate Change Action Plan has been absorbed within

the 2019/20 revenue budget. The costs of the key actions in Table 1 will be a call on this ear-marked reserve as they have not been included in the revenue budget.

5 Conclusion and Recommendation

- 5.1 The Authority has, over the last 10 years, taken steps to reduce its carbon emissions and achieved a reduction of 45 per cent against a 2009/10 baseline (scope 1 and 2). The Climate Change Action Plan produced in response to the declaration of a 'Climate and Ecological Emergency' demonstrate that we can achieve carbon neutral status by 2025 and we may already be 'carbon positive' if we factor in carbon sequestered via our land estate.
- 5.2 The key priority action for 2020/21 is to procure renewable energy from a guaranteed supply. When we achieve this we will effectively reduce our scope 1 and 2 emissions by a further 27 per cent and then make procurement of an electric vehicle fleet a feasible option (subject to budget and practical constraints). Electric vehicles will enable us to reduce the carbon footprint associated with our pool vehicles (diesel for use in our pool vehicles is our single most source of carbon emissions). Our preferred route for procuring renewable energy is via a Power Purchase Agreement and we are pursuing this in partnership with Devon County Council.
- 5.3 In developing the Climate Change Action Plan we have not focused on our land estate but prioritised actions to further reduce our carbon emissions. During the next 12 months we need to commission a more detailed study of our land estate to calculate a carbon account (the amount of carbon we are sequestering, the amount we are emitting via land management practices and the potential for further sequestration). This study is important as it will provide an evidence base to determine whether we are already carbon neutral as an organisation or even carbon positive. We need to do this prior to setting an off-setting policy for the Authority.
- 5.4 The Authority's carbon footprint is relatively small. There is a bigger question about how we reduce the carbon emissions associated with use and management of the National Park. This question forms part of the consultation on the National Park Management Plan. If we were able to secure the financial resources, landowner and commoner support to restore the actively eroding peat on Dartmoor then we calculate that we could sequester over 35,000 tCO_{2e} per annum which compares to our total carbon emissions in 2018/19 of almost 330 tCO_{2e}¹. At a simplistic level this provides an indication of where we might prioritise action to ensure that Dartmoor is contributing to the Government's net zero target by 2050.
- 5.5 It is recommended that Members:
- (i) Approve the draft Climate Action Plan and, in particular, the key actions identified in table 1.
 - (ii) Agree that the Climate Action Plan needs to be reviewed on an annual basis.
 - (iii) Note that the £50,000 earmarked in reserves to support action on climate change will be used to fund key actions in 2020/21. Any cost above this will be subject to separate Authority approval as there is no provision in the draft

¹ Area of peatland actively eroding and affecting eco-hydrology is taken from the University of Exeter Peatland Investigation and Mapping report commissioned by the Authority in 2016. Estimates of the tCO_{2e} sequestered is derived using Defra figures (Capital Grant Scheme for the Restoration of Peatland in England)

Revenue Budget for 2020/21 for further expenditure associated with the Climate Change Action Plan.

- (iv) Agree that the Chief Executive (National Park Officer) should highlight the need for an agreed carbon accounting framework and 'national action plan for carbon' to Government.

ALEX GANDY AND KEVIN BISHOP

Appendix 1: Draft Climate Change Action Plan

Appendix 2: Summary of key actions from the draft Climate Change Action Plan for 2020/21

20200306 AG/KB Climate Change Action Plan



Climate Action Plan 2020

DARTMOOR NATIONAL PARK AUTHORITY
MARCH 2020



Contents

Non-technical Summary	3
1. Introduction	4
What the Authority has achieved already	5
2. Methodology	5
Developing the National Park Authority's footprint.....	7
3. DNPA's 2018/19 Carbon Footprint	10
4. The Action Plan	11
Aim	11
Strategy	11
Methodology	12
Scope 1 Projects	14
Scope 2 projects.....	17
Scope 3 projects.....	21
5. Project summary and carbon offsetting.....	25
Offsetting projects.....	26
Offsetting costs.....	30
Prioritising projects	30
6. Conclusions and discussion.....	31

NON-TECHNICAL SUMMARY

This carbon action plan has been produced in response to Dartmoor National Park Authority's (DNPA) declaration of a climate emergency and ambition to be carbon neutral by 2025.

The action plan analyses DNPA's carbon footprint and found the Authority's 2018/19 Scope 1 and 2 footprint (i.e. direct emissions from fuel burned and energy used) was 157.1 tonnes CO₂e. This is a 51.6% reduction in carbon emission compared to the 2009/10 footprint, 304.7 tonnes CO₂e.

More work needs to be done to understand the Authority's Scope 3 footprint (i.e. indirect emissions from the goods we buy and sell, the services we procure, our investments, waste production, land assets etc.).

Projects to help the Authority reduce its emissions are recommended and their potential emissions savings estimated where possible. Project costs are estimated where sufficient information is available, these are initial costs, based on assumptions and will be liable to change. The below summarises the project areas recommended in the action plan:

Project area	Summary
Purchase or generate renewable energy	Essential for a significant reduction in emissions and unlocking the benefit of electric vehicles. This will require partnership working.
Reduce fuel use	Using a variety of methods, including purchasing electric vehicles, promoting travel alternatives and enabling staff to commute sustainably.
Ensure efficient buildings and appliances	There has been lots of good work in this area already, but opportunities remain to improve our use of buildings and electrical equipment, including reducing our printing.
Unknown emissions	There are many emissions that the Authority cannot currently measure, more work is needed to close this gap.
Behaviour change	Success is reliant on the organisation as a whole working effectively and adjusting their behaviours.
Land assets	DNPA has large land assets relative to its size, but we know little about what they sequester or emit. More work is needed to understand this. Early estimations suggest it may be possible to offset the Authority's emissions through effective management of its land assets. This will be most robust when done in partnership.

The action plan should be considered an iterative exercise, it is inaccurate in places and it will need to change to respond to new opportunities. A review of the climate action plan is recommended at least every two years.

1. Introduction

- 1.1 Dartmoor National Park Authority (DNPA) was established in 1997 as an intergovernmental body to conserve and enhance the National Park's natural beauty, wildlife, cultural heritage and special qualities, and promote their enjoyment and understanding.
- 1.2 In July 2019 Dartmoor National Park Authority joined the UK Parliament and many other Councils and organisations in declaring a climate emergency¹. This was a response to the overwhelming and unequivocal evidence that human induced climate change is occurring. And that this climate change could fundamentally change life on earth, with potentially drastic consequences for our environment², our economy³ and our quality of life⁴.
- 1.3 There is no precise definition of what constitutes action to meet a climate emergency, but the purpose of the declaration is to put climate (and the environment) at the centre of policy and practice.
- 1.4 The declaration of a climate change emergency marks a renewed sense of urgency in tackling this issue. DNPA's climate emergency declaration included a commitment to work towards the National Park Authority (as an organisation) becoming carbon neutral by 2025, subject to a detailed action plan which sets out a strategy and course of action for addressing DNPA's greenhouse gas emissions.
- 1.5 This organisational action plan represents the first step in achieving this commitment. This climate action plan is the most detailed assessment of its climate impact the Authority has ever undertaken. It has been completed by officers with consultant support from Clearlead Consulting. The action plan does not address how climate change should be tackled across the National Park as a place, this is the role of the Dartmoor Local Plan, Management Plan and emerging Devon Carbon Plan.

What does it mean to be carbon neutral?

Carbon neutrality, or having a net zero carbon footprint, means achieving net zero carbon dioxide emissions by either balancing emissions with carbon removal or eliminating carbon emissions altogether.

Importantly, the emissions required to be reduced or offset to achieve carbon neutrality is not defined, but a decision made by the organisation, informed by their carbon footprint. Therefore the accuracy of the footprint, and what is included and excluded from it, is critical. Unfortunately these details are rarely made available by organisations and this can make it difficult to know what emissions are actually being reduced or offset.

¹ [DNPA \(2019\) 'Authority report – Climate emergency declaration'](#)

² [US Global Change Research Program \(USGCRP\) 2017, Fourth Climate Assessment.](#)

³ [House of Commons Environmental Audit Committee \(2018\) 'Greening Finance: embedding sustainability in financial decision making – seventh report of session 2017-19'](#)

⁴ [IPCC \(2018\) 'Summary for Policymakers'](#)

1.6 When declaring a climate emergency DNPA also signed the Devon Climate Declaration⁵ and confirmed the Authority would support the Devon Carbon Plan, an inter-organisational climate plan for Devon which is considering the earliest credible date that should be set for net-zero emissions across Devon⁶. This work is on-going and is not within the scope of this organisational action plan.

WHAT THE AUTHORITY HAS ACHIEVED ALREADY

1.7 As part of the National Park 'family' in England, DNPA has monitored its carbon emissions since 2009 and has been working to reduce these emissions year on year. We have already achieved a 51.6% reduction in carbon emissions compared to the 2009/10 baseline (304.7 tCO_{2e}).

1.8 This has been achieved through a range of measures including:

- the installation of further insulation and secondary glazing where possible and appropriate;
- new, more energy efficient heating systems at key premises including a gas boiler at Parke and biomass boiler at Princetown sourcing woodchips from sustainable local forestry;
- LED lighting installation;
- removal of inefficient electric storage heaters and extension of wet water heating at Parke;
- server and desktop computer virtualisation significantly reducing the electrical consumption associated with ICT systems;
- smart meters at all premises, which are monitored remotely;
- improved emissions from electricity sourced from the grid; and
- the organisation's reduction in size.

2. Methodology

2.1 For transparency, the method the Authority use for monitoring its carbon emissions is provided below.

2.2 As part of the National Park family DNPA has monitored its emissions since 2009, in a way compliant with Government guidance for organisations⁷. Guidance requires that emissions monitoring is structured within 'Scopes'. A summary diagram below shows what is within each of the three Scopes. To summarise, Scope 1 is the emissions we produce directly (e.g. burning fuel), Scope 2 is indirect emissions from the energy we purchase (e.g. electricity) and Scope 3 is other indirect emissions from our activities which are not within our control (e.g. the goods we buy and sell, staff commuting, the services we procure, our investments, waste production, business travel etc.).

⁵ <https://www.devonclimateemergency.org.uk/devon-climate-declaration>

⁶ <https://www.devonclimateemergency.org.uk/devon-carbon-plan/>

⁷ Defra (2009) 'Guidance on how to measure and report your Greenhouse Gas Emissions'

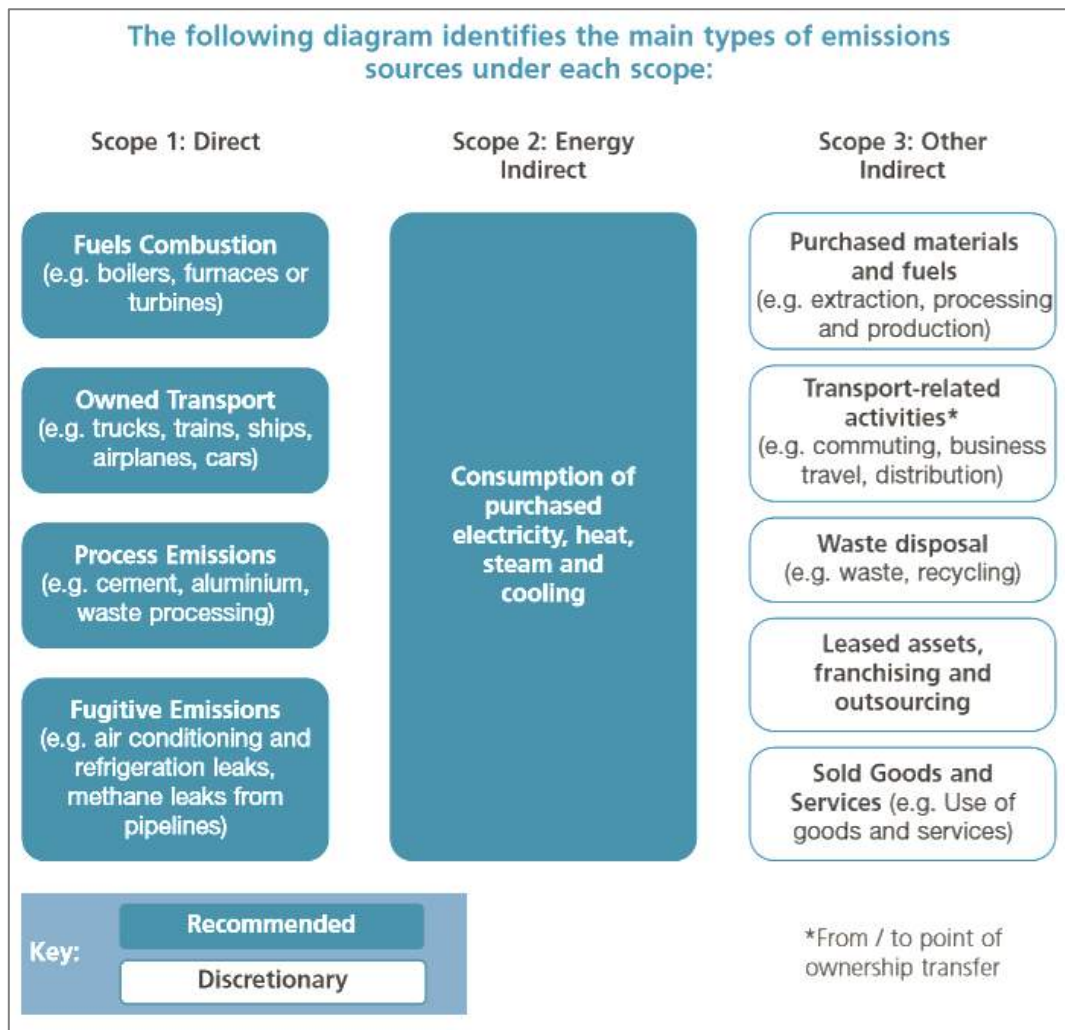


Figure 1 Summary of emission sources for Scope 1, 2 and 3 for all organisations
(Source: Defra)

2.3 It is important to understand that an organisation’s Scope 3 emissions will form part of another’s Scope 1 and 2 emissions. Therefore there is the potential for double counting between organisations when monitoring Scope 3 emissions. Scope 3 emissions can also be difficult to measure because they rely on other organisations monitoring their emissions accurately. Scope 3 emissions are always not in direct control of the monitoring organisation. Nevertheless, tackling Scope 3 emissions allows collaboration both upstream and downstream of the Authority and can be used to use the Authority’s influence and buying power to encourage other organisations and companies to reduce their emissions.

How are greenhouse gas emissions measured and estimated?

A carbon footprint is measured in tonnes of carbon dioxide equivalent (tCO_{2e}). Carbon dioxide equivalent (CO_{2e}) allows the different greenhouse gases to be compared on a like-for-like basis relative to one unit of CO_{2e}. CO_{2e} is calculated by multiplying the emissions of each of the six greenhouse gases by its 100 year global warming potential (GWP).

A carbon footprint considers all six of the Kyoto Protocol greenhouse gases: Carbon dioxide (CO₂), Methane (CH₄), Nitrous oxide (N₂O), Hydrofluorocarbons (HFCs), Perfluorocarbons (PFCs) and Sulphur hexafluoride (SF₆).

Each year the UK Government publishes emission factors for converting activity data, such as fuel and energy use, into a value of tonnes of carbon dioxide equivalent (tCO_{2e}). This can be used for measuring Scope 1 and 2 emissions and some Scope 3 emissions in a carbon footprint. However, the factors are not exhaustive and do not generally consider the emissions involved in the production and manufacture of goods purchased. They are therefore of limited use for measuring Scope 3 emissions and, where available, up to date scientific studies or data from manufacturers are generally relied upon for this purpose.

DEVELOPING THE NATIONAL PARK AUTHORITY'S FOOTPRINT

- 2.4** Dartmoor National Park Authority has a broad variety of land, property and machinery assets which all needed to be taken into consideration when developing the footprint. The following lists significant assets leased, owned and rented by DNPA:

Property:

- Parke House, Bovey Tracey
- Duchy Hotel, Princetown
- 3 x Visitor Centres at Haytor, Princetown (Duchy Hotel) and Postbridge
- Works and storage depot at Bovey Tracey
- Heritage property at Uppacott Cottages, Poundsgate
- Various storage buildings, car parks, laybys and public toilets

Land holdings:

- Approximately 110Ha of woodland
- Approximately 1,015Ha of moorland and heathland with some woodland

Vehicle fleet:

- 3 small diesel pool cars
- 12 diesel 4x4s
- 6 diesel vans of various sizes.

- 2.5** The following table summarises how DNPA monitors its Scope 1 and 2 emissions. It also includes Scope 3 emissions and whether they can be monitored at the current point in time.
- 2.6** The accuracy of the carbon footprint can always be improved, and calculating accurate emissions is an iterative exercise that should be repeated as more data and information becomes available. The Authority will work to improve the accuracy

of its carbon footprint and seek to accurately calculate emissions for activities it currently has no data for. This process forms part of the carbon action plan.

Scope 1		Accuracy (over / under estimate)
Diesel and petrol	Consumption (Litres) in DNPA's vehicle fleet is monitored through the corporate fuel scheme, consumption is converted to carbon emissions using the government emission conversion factors.	High
Natural Gas	Consumption monitored through provider (kWh) and converted to carbon emissions using the government emission conversion factors.	High
Woodchip	Woodchip is purchased from local sustainable forestry (Brimpts Farm), emission factors are not available from the supplier so the government emission conversion factors are used (likely an overestimate).	Medium (overestimate)
Oil	Consumption is monitored through orders and converted to carbon emissions using the government emission conversion factors.	High
Scope 2		
Electricity	Consumption monitored through provider (kWh) and converted using the government emission conversion factors.	High
Scope 3		
Grey fleet	Staff use of personal vehicles for business is monitored through mileage claims and converted to carbon emissions using government emission conversion factors for a medium-sized Diesel car. There is the potential for over / under estimate where staff cars vary in size and type.	Medium (unknown)
Water supply	Consumption monitored through the provider (m ³) and converted using the government emission conversion factors.	High
Water treatment	Consumption monitored through the provider (m ³) and converted using the government emission conversion factors.	High
Business travel	Monitored through travel claims and converted to carbon emissions using the government emission conversion factors for coach, train and air travel.	High
Staff Commuting	Monitored through a staff survey (65% response rate) which asks staff and Members to summarise their commuting patterns including the type of vehicle used. The corresponding factors were then used to estimate annual carbon emissions for each respondent and extrapolated to estimate the total carbon emissions for the whole organisation.	Low-medium (unknown)
Internal Printing	Monitored with software and converted using emission factors from paper and ink manufacturers.	High

Enjoy Dartmoor	Electricity emissions provided by the manufacturer. Paper emissions calculated using government emission conversion factors. Emissions from ink not calculated.	Medium (unknown)
Investments	Not yet available. DNPA is in the process of transferring its Local Government Pension Scheme investments to the Brunel Pension Partnership. At the September 2019 Investment and Pension Fund Committee it was agreed to commission a carbon footprint analysis of the Fund's investments, a report is expected for the February 2020 committee.	-
Procured goods	Not yet available.	-
Procured services	Not yet available.	-
Land assets	Not yet available.	-

3. DNPA's 2018/19 Carbon Footprint

Emission source	Scope 1				Scope 2				Scope 3				Total	%
	Consumption	Unit	Emission factor kgCO ₂ e/unit	tCO ₂ e	Consumption	Unit	Emission factor kgCO ₂ e/unit	tCO ₂ e	Consumption	Unit	Emission factor kgCO ₂ e/unit	tCO ₂ e		
Natural gas	121,227	kWh	0.18	22.3					121227	kWh	0.02	2.9	25.2	7.7%
Oil	2,253	L	2.54	5.7					2253	L	0.05	0.1	5.8	1.8%
Diesel	28,948.9	L	2.59	75.1					28948.9	L	0.06	1.7	76.8	23.4%
Petrol	163	L	2.21	0.4					163	L	0.06	0	0.4	0.1%
Wood chip	191	tonnes	59.03	11.3					191	tonnes	30.4	5.8	17.1	5.2%
Electricity					165719	kWh	0.3	42.4	165719	kWh	0.02	3.6	46	14%
Grey fleet									44601	miles	0.28	12.2	12.2	3.7%
Water supply									1422	m ³	0.34	0.5	0.5	0.1%
Water treatment									1279.8	m ³	0.71	0.9	0.9	0.3%
Business travel flights									18847	pax.km	0.28	5.3	5.3	1.6%
Business travel coach									113	pax.km	0.03	0	0	0%
Business travel rail									37224	pax.km	0.05	1.8	1.8	0.6%
Commuting												114.2	114.2	34.7%
Enjoy Dartmoor Magazine												20.8	20.8	6.3%
Internal printing												1.5	1.5	0.5%
Total	114.7				42.4				170				328.5	100%

4. The Action Plan

AIM

- 4.1 This action plan seeks to identify actions that will enable DNPA to become a carbon neutral organisation by 2025. There is no established framework for calculating carbon neutrality or determining what emissions are and are not included. There is therefore a need for DNPA to clarify its objectives.
- 4.2 DNPA does not have a complete and accurate Scope 3 footprint, and therefore by definition DNPA cannot currently be carbon neutral against its Scope 3 emissions. Many Scope 3 emissions may also be monitored as Scope 1 and 2 by other organisations, albeit this risk is considered minimal because of the relatively few organisations currently completing carbon footprints and the relatively small size of organisation DNPA generally do business with.
- 4.3 DNPA propose to focus on becoming carbon neutral against Scope 1 and 2 emissions by 2025. DNPA will continue to monitor and calculate its Scope 3 emissions and reduce and offset them on a case by case basis where practical and appropriate.

STRATEGY

- 4.4 Various strategies can be employed to achieve carbon neutral status and there is very little consensus over their effectiveness. For example, it is still possible to achieve carbon neutrality by only offsetting emissions through projects such as tree planting, and not reducing emissions.

What does it mean to carbon offset?

A carbon offset is an action intended to compensate for the emissions of carbon dioxide and other greenhouse gas emissions into the atmosphere as a result of human activity.

Various commercial schemes exist (e.g. Voluntary Carbon Credits) from which carbon offset credits can be purchased. Offsetting may also be undertaken by an organisation directly on their own land assets. These will generally be considered as carbon sinks, unless they are formally registered under an offsetting scheme.

- 4.5 DNPA wants to ensure this action plan is used effectively to address climate change. On this basis, the action plan should be used to bring about change and help reduce DNPA's direct climate impacts, rather than offsetting its impact and allowing emissions to remain unchanged. DNPA would like the action plan to eventually work towards the Authority being close to carbon zero (i.e. emitting 0 carbon) when the technology and processes allow. When implementing the action plan DNPA will therefore use the energy hierarchy to inform how projects are prioritised. The hierarchy prioritises actions as follows:

Be lean: reduce demand - e.g. use less fuel and electricity
Be clean: improve efficiency - e.g. use technology which allows less energy to be used
Be green: source requirements from low carbon and renewable sources - e.g. green electricity from solar and wind installations
Offset: offset the impact of unavoidable emissions - e.g. by helping someone else reduce their emissions or investing in a natural or mechanical way of removing carbon from the atmosphere, such as tree planting.

- 4.6** The target to be carbon neutral by 2025 can work to disrupt this hierarchy. To be carbon neutral DNPA will likely need to balance its resources between emission reduction, efficiencies, sourcing green energy and offsetting. Where insufficient resources are available to invest in emissions reduction, efficiencies and green energy to achieve the 2025 target, the temptation will be to invest in offsetting. In working to this hierarchy, DNPA will need to carefully consider at what point emissions are considered unavoidable and can reasonably be offset. There is no consensus on this, but it is recommended that DNPA consider the possibility of not meeting the 2025 target where it is clear that investment in emission reduction, efficiencies, and sourcing green energy, rather than offsetting, would deliver greater societal and environmental benefit for current and future generations.
- 4.7** In addition to this DNPA will as far as possible examine the lifecycle emissions of any projects so the full impact of actions can be appraised before they are committed to. As discussed above, the lifecycle emissions of products are not generally considered by government emission conversion factors, but can be critically important to overall emissions. This is particularly the case with high-tech items such as electric vehicles, where much of a products' emissions over its lifetime are contained within its manufacturing stages at the beginning of the product's life.
- 4.8** There can also be a temptation to concentrate on visible leadership rather than invisible leadership. For example, prioritising purchasing electric vehicles that can be seen, rather than renewable energy which would have a greater impact but is invisible. DNPA will pursue the most effective strategies to reduce its climate impact, where these are invisible DNPA will work to promote them through its communications outlets.
- 4.9** The action plan has been compiled with input from staff and Members. It is an iterative piece of work and will continue to be refined as knowledge, data, innovations and budgets change.

METHODOLOGY

- 4.10** The proposed carbon reduction projects are presented in the next section. The projects are presented by scope and each project has costs, carbon saving estimations and other calculations which allow the projects to be compared. A description of the structure used for each project is provided below:

Project Number: Project title

Cost: The overall cost of the project (any assumptions or items not included are noted in the project summary).

Potential emission savings per annum: Estimate of how much CO_{2e} the project will save each year.

Cost saving: Estimate of how much money the project will save through efficiency savings.

Mitigated offsetting cost: The estimated cost of offsetting the project's carbon savings were it not pursued. Based on £190/tonneCO_{2e}.

Payback: The number of years it will take the project to pay for itself through efficiency savings and mitigated offsetting costs.

£/CO_{2e}: How much each tonne of CO_{2e} saved will cost for the project. Where the project requires a single one-off investment this improves with time, and so a number of values are given at various years in the project. It should be acknowledged however that the value is calculated using today's emission conversion factors, these will change with time and so the £/CO_{2e} value will change too.

Project Summary: Description of the project, assumptions made and any need for further work.

SCOPE 1 PROJECTS

Project 1: Purchase electric vehicles

Cost	£142,656
Potential emission savings per annum:	17.84 tCO _{2e} (assuming renewable energy used)
Cost saving	£1,815/year
Mitigated offsetting cost:	£3,389/year
Payback:	27 years
£/CO_{2e}:	Year 1: £8,000 Year 5: £1,600

Project Summary:

Purchase electric vehicles to reduce fuel use on current DNPA vehicles, current emissions are:

- 12 x 4x4s - 48.9 tCO_{2e} (71%) [25mpg]
- 4 x Vans - 13.2 tCO_{2e} (19.4%) [29mpg]
- 3 x Pool Cars - 6 tCO_{2e} (8.8%) [51mpg]

The initial proposal involves reducing emissions from the ranger 4x4 vehicles by 20-30% over 5 years. 4x4 capacity is required to be maintained to maintain an effective Ranger service. The Land Rover Defenders would be replaced with a mix of more efficient diesel vehicles (Toyota Hilux, Isuzu, and Suzuki Jimny vehicles) and one electric hybrid (Mitsubishi Outlander PHEV). This would keep most of the Ranger's existing capacity (electric vehicles cannot currently achieve 100% of what DNPA Rangers require) whilst also trialing the performance of alternative vehicles. The proposal also involves replacing one of the pool vehicles with an electric alternative, a staff transport survey suggested that a vehicle with a 100 mile range would be adequate for the vast majority of users.

Lifecycle analysis studies⁸ compare emissions from the manufacture and use of electric and traditional vehicles. Whilst there is significant variation, studies generally show the benefit of electric vehicles becomes negligible if charging vehicles from the UK grid, the majority of benefit is achieved when charging using 100% renewable electricity. The emissions from production of the battery are a high proportion of the lifecycle carbon emissions and the case for electric vehicles is particularly worsened if a replacement battery is needed after 8-10 years' service.

Project costs do not currently factor in potential savings from maintenance of the current vehicle fleet. It also does not consider costs for installation of charging points at various sites to support charging. The carbon savings stated are based on renewable energy being used to charge the vehicles. The cost of renewable energy is assumed at a renewable tariff of 20p/kWh.

In summary:

- Significant overall emission savings are unlikely to be considerable unless electric vehicle purchase is combined with renewable energy purchase
- Purchasing early can help support an emerging sector
- Costs and benefits of electrifying further DNPA vehicles needs to be considered.

⁸ <https://www.eea.europa.eu/publications/electric-vehicles-from-life-cycle>
<https://theicct.org/publications/EV-battery-manufacturing-emissions>

Project 2: Promote travel alternatives

Cost	£0
Potential emission savings per annum:	1.83 tCO _{2e}
Cost saving	£783/year
Mitigated offsetting cost:	£348/year
Payback:	0 years
£/CO_{2e}:	£0
<p>Project Summary: Discourage travel to unnecessary meetings and on avoidable trips. Promote existing dial-in and video conferencing options as suitable alternatives. Encourage home-working where appropriate, bearing in mind this can lead to additional emissions from heating and electricity use at home during the winter. This needs to be carefully implemented and it acknowledged that not all staff will be able to work from home or avoid trips and meetings due to the nature of their work. Face to face meetings and a populated work environment are essential to much of DNPA's work and it will often not be appropriate to discourage them. An appropriate balance will need to be struck between each Officer and managers.</p> <p>10% saving has been assumed to show potential emission savings. Current emissions from grey fleet and pool vehicles combined is 18.3tCO_{2e}. This may overestimate potential savings.</p>	

Project 3: Review Buildings Efficiency

Cost	To be assessed
Potential emission savings per annum:	
Cost saving	
Mitigated offsetting cost:	
Payback:	
£/CO_{2e}:	
<p>Project Summary: Significant improvements have already been made. This project seeks to ensure the potential for further improvement is always under review and cost/benefit analysis of options is always being considered. Potential opportunities include:</p> <ul style="list-style-type: none"> Monitoring building use patterns Draft proofing Air tightness Improved room layouts relative to heating sources Secondary glazing / insulation Replace remaining gas / oil boilers Conduct data analysis to review baseline Heating controls review <p>Identified projects will then form individual projects on the action plan.</p>	

Project 4: Purchase electric land management equipment

Cost	To be assessed
Potential emission savings per annum:	0.36 tCO _{2e} (assuming renewable energy used)
Cost saving	£180.93/year
Mitigated offsetting cost:	£68/year
Payback:	to be assessed
£/CO_{2e}:	to be assessed
Project Summary: Purchase electric tools, such as strimmers, chainsaws etc., to prevent use of fuel in traditional tools. The Authority use 121L of petrol in 2018/19, equivalent to 268kgCO _{2e} . The vast majority of this is from land management tools. Cost of electric alternatives to be looked at and cost-benefit analysis completed. Given emissions are very small and costs likely to be high, this is not considered a priority. Costs of replacement electric equipment should be considered when existing equipment has reached the end of its useful life. The emission savings assume renewable electricity is used to charge equipment. Cost savings do not take into consideration the additional electricity cost for charging machinery.	

SCOPE 2 PROJECTS

Project 5: Purchase renewable energy (3 options)

Option 1

Cost	Negligible
Potential emission savings per annum:	42.4tCO _{2e}
Cost saving	£0
Mitigated offsetting cost:	£8,056/year
Payback:	No payback
£/CO_{2e}:	to be assessed
<p>Project Summary: Purchase green tariff via existing energy provider. This is very low cost (appx £80/year).</p> <p>Green tariffs use the trading of Renewable Energy Guarantees of Origination (REGOs). When a renewable generator produces green energy they receive a REGO from Ofgem which can then be kept (if they want the carbon credential) or sold. Prices for REGO certificates on the market are very low, far too low to incentivise the installation of more renewable energy infrastructure. For this reason they are not seen as being sufficient to increase the overall supply of renewable energy supply in the UK. The Committee on Climate Change has concluded we need a quadrupling of renewables in the UK if we're to achieve our climate targets⁹. Ofgem has stated that it has seen no evidence that green tariffs "could materially support the production of renewable energy over and above what is already in place".</p>	

Option 2:

Cost	Negligible (risk of £2,000 per year)
Potential emission savings per annum:	42.4tCO _{2e}
Cost saving	Negligible (potential for £1,700 per year)
Mitigated offsetting cost:	£8,056/year
Payback:	No payback
£/CO_{2e}:	Worst case: £47 Best case: - £40
<p>Project Summary: Combine with other Local Authority bodies and purchase renewable energy via a power purchase agreement (PPA). A PPA is a contract between the supplier and consumer of energy, it can set out how the electricity should be generated and the price it will be bought for as well as other details. This allows a group of energy purchasers to get certainty they will generate renewable energy equivalent to their consumption and also that the price they purchase energy at will be utilised for the development of renewable energy infrastructure.</p> <p>This approach is currently being pursued in partnership with Devon County Council and other Councils and public bodies in Devon. Initial cost estimates suggest costs will be neutral over 17 years. However, the PPA is effectively hedging and there is</p>	

⁹ Committee on Climate Change (2019) 'Net Zero: The UK's contribution to stopping global warming'

financial risk involved. Against current BEIS price forecasts this risk is currently estimated to be an average £2,000 cost or £1,700 saving per year over a 17 year period, assuming DNPA's 2018/19 consumption remains constant (it is forecast to rise). This risk can be mitigated to some degree by only purchasing a portion of electricity through the PPA, in which case were electricity prices from the grid to be lower than forecast, this would serve to compensate the costs associated with the PPA. This approach would not however allow DNPA to reduce emissions associated with its electricity consumption to zero.

It's important to understand that the PPA will not provide DNPA with renewable electricity on an electron by electron basis. The renewable energy produced will be fed into the National Grid and used by general consumers and DNPA will continue to draw its energy from its existing electrical connections to the National Grid. There is no way of knowing the precise source of the grid electricity that DNPA uses. The PPA enables DNPA to:

- generate an amount of renewable energy which is equivalent to its annual consumption; and
- have confidence this arrangement has led to additional renewable energy infrastructure which will feed into the National Grid, that would not otherwise be justified by the energy market.

Option 2 requires further investigation and scoping which is kindly being led and supported by officers at Devon County Council. At this stage, this is the preferred option for sourcing renewable energy.

Option 3:

Cost	£8,286/year
Potential emission savings per annum:	42.4tCO _{2e}
Cost saving	£0
Mitigated offsetting cost:	£8,056/year
Payback:	No payback
£/CO_{2e}:	£195/year

Project Summary:

Purchase electricity via Ecotricity or similar supplier who guarantees purchase of renewable electricity through their own infrastructure or power purchase agreement. This option is complex and requires DNPA to withdraw from the DCC framework agreement which has long been financially advantageous.

There would be an approximate 5p/kWh premium (assuming 20p/kWh tariff), and so annual premium of £8,286 based on 2018/19 usage, and £41.5k cost over 5 years.

Project 6: Installation of Solar PV at Haytor Visitor Centre

Cost	£6,000
Potential emission savings per annum:	0.606tCO _{2e}
Cost saving	£540/year
Mitigated offsetting cost:	£131/year
Payback:	9 years
£/CO_{2e}:	Year 1: £9,360 Year 5: £1,980 Year 10: £990
<p>Project Summary: Installation of solar PV panels to generate electricity for use at premises. Ensures energy is renewable and potential for electricity cost savings, particularly at higher renewable energy rate.</p> <p>Other potential installation sites to be reviewed include: Haytor Bovey Tracey Depot Parke</p> <p>Insufficient electrical load capacity or installation opportunities at other sites.</p> <p>For the Haytor Visitor Centre, estimates have been obtained for a 3kWh system (10 x 300W+ panels). Similar units are known to generate approximately 2,700kWh per year in Bovey Tracey (sourced from private systems). This equals a cost saving of £405/year and £2,025 over 5 years.</p> <p>Lifecycle emissions to be taken into consideration when accounting for potential emissions savings¹⁰. Maintenance costs need to be considered. Carbon savings assume electricity would otherwise be sourced from the grid, emission conversion factors for the National Grid are due to improve and so it is likely the £/CO_{2e} figure will worsen with time. Cost savings assume electricity would otherwise need to be sourced from renewable sources at a tariff of 20p/kWh.</p>	

Project 7: Audit of high demand electrical items

Cost	To be assessed
Potential emission savings per annum:	
Cost saving	
Mitigated offsetting cost:	
Payback:	
£/CO_{2e}:	
<p>Project Summary: Review all electrical items rated over 1kW and determine whether these are necessary or can be replaced by more efficient alternatives. Where specific items have been identified already they form distinct projects within the action plan.</p>	

¹⁰ <https://www.theccc.org.uk/wp-content/uploads/2013/04/Ricardo-AEA-lifecycle-emissions-low-carbon-technologies-April-2013.pdf>
<https://www.sciencedirect.com/science/article/pii/S0301421513010719>

Project 8: Convert Parke electric shower to wet system

Cost	£500
Potential emission savings per annum:	0.607tCO _{2e}
Cost saving	£475/year
Mitigated offsetting cost:	£115
Payback:	1 year
£/CO_{2e}:	£824
Project Summary: Remove high use electrical item and install shower which makes use of hot water already created by immersion boiler. Consider whether there is an opportunity to use shower refurbishment as a way to encourage staff to commute by more sustainable means. This would likely provide higher overall emissions savings.	

Project 9: Install LED lighting to Parke Car Park

Cost	£2,000
Potential emission savings per annum:	0.608tCO _{2e}
Cost saving	£488/year
Mitigated offsetting cost:	£116
Payback:	3.5 years
£/CO_{2e}:	£3,289
Project Summary: Parke car park comprises 6 x 1kW lights used for 4 hours each day Monday to Friday during winter months (2,640kWh consumed annually assuming 5.5 months use). LED alternative would be 6 x 100W LED lights (264kW consumed annually assuming 5.5 months use). Cost savings based on renewable tariff of 20p/kWh. Carbon savings assume electricity sourced from grid.	

Project 10: Install LED lighting to Princetown Duchy Hotel

Cost	To be assessed
Potential emission savings per annum:	
Cost saving	
Mitigated offsetting cost:	
Payback:	
£/CO_{2e}:	
Project Summary: Consider installation of LED lighting to frequently used rooms at the Duchy Hotel Princetown, 1 st Floor (Ground floor already converted to LED).	

SCOPE 3 PROJECTS

Project 11: Carbon footprint Land Assets

Cost	To be assessed
Potential emission savings per annum:	
Cost saving	
Mitigated offsetting cost:	
Payback:	
£/CO_{2e}:	
<p>Project Summary: Calculating emissions from the use and management of DNPA land assets is likely to be large source of carbon emissions and/or sequestration. A detailed assessment of the carbon footprint of DNPA's land assets will provide essential information to support DNPA's ambition to be carbon neutral. Identifying where there are opportunities, issues to address and action that could support further sequestration to support the Authority's ambition to be carbon neutral, potentially even carbon negative. The Authority own approximately 1300Ha of woodland, moorland and other assets.</p> <p>This will likely be an iterative exercise as research and understanding of DNPA's land assets and their carbon credentials improves over time. Various studies review recent data on emissions from land assets and can be used to begin to understand DNPA's land assets¹¹¹², albeit there can be significant scope for error when applying these studies in different contexts.</p>	

Project 12: Investments

Cost	To be assessed
Potential emission savings per annum:	
Cost saving	
Mitigated offsetting cost:	
Payback:	
£/CO_{2e}:	
<p>Project Summary: DCC is in the process of transferring its Local Government Pension Scheme (LGPS) investments to the Brunel Pension Partnership. At the September 2019 DCC Investment and Pension Fund Committee it was agreed to commission a carbon footprint analysis of the Fund's investments. This is now underway and a report is expected for the 28 February 2020 committee. Dependent on the results, a project may be required to help influence how the LGPS is invested.</p> <p>Significant progress has already been made by the Brunel Pension Partnership and DNPA are currently committed to working with the Partnership and other local government bodies to influence how investment decisions are made and shareholder voting rights are used. Various recent articles and news updates summarise Brunel's recent actions to address climate change in the finance sector¹³.</p>	

¹¹ Natural England (2012) 'Carbon storage by habitat'

¹² RSPB (2017) 'Accounting for nature: A natural capital account for the RSPB's estate in England: Annex 7'

¹³ Brunel Pension Partnership (2020) 'Brunel clients collaborate with ShareAction to demand lenders address climate change'

Brunel Pension Partnership (2020) '£30bn Pension Partnership calls finance sector 'not fit for purpose' for addressing climate change'

Project 13: Carbon Footprint of procured items

Cost	£0
Potential emission savings per annum:	
Cost saving	
Mitigated offsetting cost:	
Payback:	
£/CO_{2e}:	
<p>Project Summary: DNPA is currently unable to monitor the carbon footprint of items that it procures. DNPA therefore doesn't currently know the emissions associated with work it outsources. As a first step in understanding this, it is proposed to request that contractors submit carbon emissions information when responding to Tenders and Invitations to Quote. They will be required to provide their annual footprint and a forecast of the likely emissions involved in completion of the contract.</p> <p>This requirement will be voluntary at first, with the potential to become compulsory in the future. Importantly, any new approach or request for information must ensure that SMEs and micro businesses are not over-burdened.</p>	

Project 14: Digital by default

Cost	To be assessed
Potential emission savings per annum:	0.3326tCO _{2e}
Cost saving	£350/year
Mitigated offsetting cost:	£63/year
Payback:	To be assessed
£/CO_{2e}:	To be assessed
<p>Project Summary: DNPA prints approximately 28,000 sheets of paper each month and approximately 350,000 sheets per year. Although we have tested recycled paper, good print quality has so far only been achieved through use of non-recyclable paper.</p> <p>Savings of 20% have been assumed to show potential benefits of a digital by default project.</p> <p>Project options, include</p> <ol style="list-style-type: none"> 1. Purchase technology to allow staff and members to use digital devices, rather than paper 2. Review all DNPA processes which rely heavily on printing and develop processes which avoid printing, including purchasing software where necessary. 3. Use certified carbon neutral paper stocks where printing is necessary 	

[The Guardian \(2020\) '£30bn pension fund: we'll sack asset managers that ignore climate crisis'](#)
[The Guardian \(2020\) 'Pension funds urge Barclays to stop lending to fossil fuel firms'](#)

Project 15: Encourage sustainable commuting

Cost	To be assessed
Potential emission savings per annum:	11.59tCO _{2e}
Cost saving	£350/year
Mitigated offsetting cost:	£2,202/year
Payback:	No payback
£/CO_{2e}:	
Project Summary: Ensure staff have sufficient access to facilities which allow them to travel sustainably and are encouraged to do so. Commuting patterns were analysed through a staff survey and options for reducing this are: <ul style="list-style-type: none">- Improve shower and changing facilities- Subsidise public transport costs- Install one or more electric vehicle charging points- Encourage staff to purchase fuel through offset schemes- Facilitate car sharing by promoting a car share map- Consider how home working could reduce commuting emissions- Promote the cycle to work scheme A carbon saving of 10% has been assumed to show the potential benefit of the projects identified.	

Project 16: Review procurement strategy for Visitor Centres

Cost	To be assessed
Potential emission savings per annum:	
Cost saving	
Mitigated offsetting cost:	
Payback:	
£/CO_{2e}:	
Project Summary: Review strategy for ensuring goods sold in shops are, where possible, locally sourced, plastic free, recyclable and have limited carbon emissions.	

Project 17: Review waste strategy

Cost	To be assessed
Potential emission savings per annum:	
Cost saving	
Mitigated offsetting cost:	
Payback:	
£/CO_{2e}:	
<p>Project Summary: Review existing contractor to ensure they are the most efficient and recycle where possible.</p> <p>Explore the possibility of installing sorting bins to allow recycling of currently non-recyclable items via Terracycle.</p>	

Project 18: Review Enjoy Dartmoor magazine distribution strategy

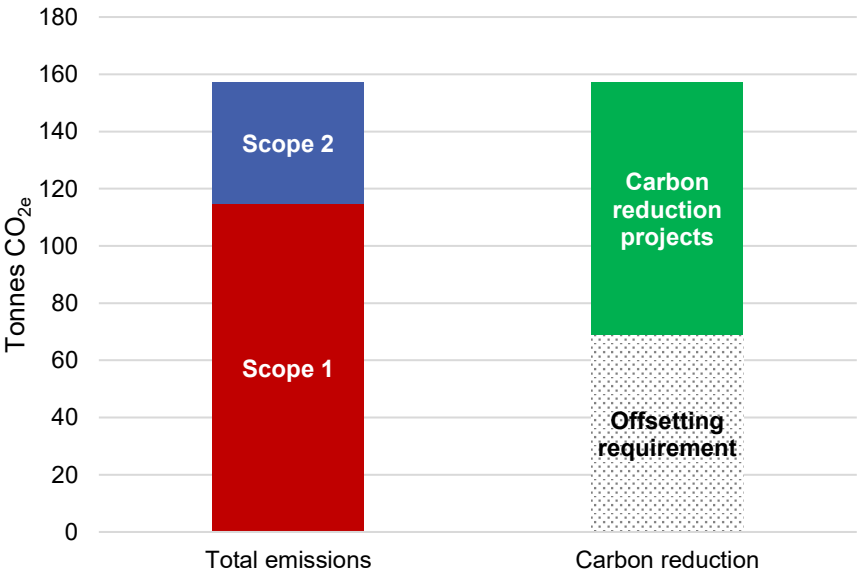
Cost	To be assessed
Potential emission savings per annum:	10.4tCO _{2e}
Cost saving	
Mitigated offsetting cost:	
Payback:	
£/CO_{2e}:	
<p>Project Summary: Currently 100,000 copies of Enjoy Dartmoor are printed and distributed and this contributes to 6.3% of DNPA's footprint as currently calculated.</p> <p>Options for reviewing how effective this distribution format is include: Survey readers to establish their view of the content and how they would prefer to consume it Shorten and digitise all or part of the magazine Monitor wastage through distributors and revise total print numbers</p> <p>50% savings have been assumed to approximate potential carbon savings following an ambitious project.</p>	

Project 19: Behaviour change campaign

Cost	To be assessed
Potential emission savings per annum:	
Cost saving	
Mitigated offsetting cost:	
Payback:	
£/CO_{2e}:	
Project Summary: Raise awareness of the impact of DNPA and how this can be reduced by actions from the staff. Encourage behavior change in key areas, such as: Driving - to meetings and commuting Switching off equipment - lights and office equipment Printing Heating controls - turning down heating, shutting windows, shutting doors etc. Reducing overnight consumption Procurement	

5. Project summary and carbon offsetting

5.1 The below summarises DNPA’s total Scope 1 and 2 carbon emissions. It also shows the combined effect of the discussed carbon reduction projects from this action plan, where emission savings data is currently available. As a result of implementing the discussed Scope 1 and 2 projects DNPA’s footprint would reduce from 157.1 tCO_{2e} to 69.28tCO_{2e}, a reduction of 44% over the 2018/19 baseline and 77.3% over the 2009/10 baseline.



5.2 Importantly, the proposed projects are not sufficient on their own to achieve carbon neutral status. As it stands it will be necessary to offset DNPA’s remaining scope 1 and 2 emissions with carbon offsetting projects to achieve carbon neutrality. As the plan and projects are implemented, new ideas may be added which would further reduce carbon emissions, however, it is likely

that there will always be a small proportion of emissions which require offsetting.

- 5.3 Various carbon offsetting options exist, these options and their relative merits are discussed below in further detail.

OFFSETTING PROJECTS

Offsetting Project 1: Community Climate Fund

Cost required to offset:	£30,000 annually
£/tCO₂e:	£191
Project Summary: Establish a fund to support community projects which would reduce carbon emissions. The first year's carbon savings from each funded project could be claimed as an offsetting credit and subtracted from DNPA's footprint. The costs and savings would be dependent on what works were funded. The Authority could set its own funding criteria and a maximum value for money threshold of approximately £190/tCO ₂ e (equivalent to Salix Finance Ltd. funding which is a BEIS funded independent company ¹⁴). At this level it would cost approximately £30,000 annually to offset the Authority's current emissions. This could be a significant underestimate if high quality value for money projects are not forthcoming.	

Offsetting Project 2: Purchase of renewable energy

Cost required to offset:	£98,286 annually
£/tCO₂e:	£626.03
Project Summary: Purchasing renewable energy to feed-in to the grid and offset the energy use of others is a valid way offset carbon emissions. 450MWh would be needed to offset DNPA's Scope 1 footprint (115tCO ₂ e). DNPA's Scope 2 footprint would not need to be offset if this was covered by renewable energy at a cost of approximately £8,286 per year as proposed in the action plan.	

Offsetting Project 3: Generate renewable energy

Cost required to offset:	To be assessed
£/tCO₂e:	
Project Summary: Costs of DNPA investing directly in various electricity generating infrastructure are currently being investigated.	

¹⁴ www.salixfinance.co.uk/

Offsetting Project 4: Land purchase for tree planting

Cost required to offset:	£730,080 one-off investment (will not achieve 2025 target)
£/tCO₂e:	<p>Year 5 (1.1 tCO₂e/Ha): £22,468</p> <p>Year 10 (4.5 tCO₂e/Ha): £5,492</p> <p>Year 30 (164.9 tCO₂e/Ha): £150</p> <p>Year 100 (560.7 tCO₂e/Ha): £44</p>
<p>Project Summary: Purchase sufficient land to plant trees that will sequester enough carbon to offset the impact of DNPA's Scope 1 and 2 emissions.</p> <p>A study by Exmoor National Park¹⁵ estimates that 1Ha Native Woodland sequesters 560.7tCO₂e over 100 years with most of this occurring between 15 year and 60 year maturity.</p> <p>Assuming an average of 5.6tCO₂e per hectare per year. DNPA would need 28Ha of woodland to offset its current Scope 1 and 2 emissions. However, trees sequester far less CO₂ at the beginning and end of their life. The reality is that in the first 5 years of a broadleaf planting scheme only 0.2tCO₂ is likely to be sequestered per hectare per year. So roughly 142Ha of trees would be needed for the Authority to be carbon neutral by 2025. This does not take into consideration emissions associated with planting, managing and monitoring these assets.</p> <p>80% funding for planting is available through the Woodland Carbon Fund¹⁶ for planting schemes of 10Ha or more, comprising 70% productive tree species and with costs capped at £6,800 per hectare, this is considered conservative and unlikely to cover labour.</p> <p>Land costs would likely be in the region of £10,000 per acre, with 28 Ha costing approximately £692,000 and 142Ha costing £3.5m.</p> <p>Planting costs for 28Ha would be £190,400. £38,080 with 80% grant funding.</p> <p>Capital costs for land and planting 28Ha would therefore be very roughly £730,080. Capital costs would be one off and therefore the benefit improves with time. The emission savings above have been calculated using the more accurate variable sequestration rate within the Exmoor study.</p> <p>Ongoing management, maintenance and other revenue costs would also need to be assessed and their potential emissions fully considered.</p>	

¹⁵ [Exmoor National Park Authority \(2013\) 'Quantifying carbon storage and sequestration in woodlands in Exmoor National Park'](#)

¹⁶ <https://www.gov.uk/guidance/woodland-carbon-fund>

Offsetting Project 5: Habitat restoration on DNPA land assets

Cost required to offset:	To be assessed
£/tCO₂e:	

Project Summary:

The potential to use DNPA's existing land assets to sequester carbon is currently being appraised and costs calculated. This is a complicated exercise. The carbon footprinting exercise discussed in project 11 of the action plan has been included to help identify opportunities for carbon sequestration on DNPA's land assets to offset our emissions and also understand the likely emissions which occur from the management of those assets. in accordance with DNPA's existing land management plans and agri-environment schemes for each asset.

Where possible, it is likely that completing offsetting projects on DNPA's existing land assets will be more cost effective than purchasing energy or new land. To provide some examples of how this might work the below table summarises some scientific studies that have studied the carbon sequestration rate of different habitat changes. The table shows how much land area would be required to offset DNPA's 2018/19 Scope 1 and 2 emissions by targeting a selection of example habitat changes.. Data for this exercise is taken from a 2012 Natural England publication¹⁷.

Habitat change	Annual carbon sequestration rate (tCO₂e /Ha /year)	Area needed to offset Scope 1 and 2 emissions in 1 year (157tCO₂e)
Improved grassland to woodland	-7.83 to -13.7	20 - 11Ha
Grassland to wetland	-2.39 to -14.3	66 - 11Ha
Restore unimproved grassland	-6.96	23Ha
Improved grassland to pollen and nectar mix	-5.87	27Ha

It is important to note that this is a very rough exercise and the level of detail given in the above table provides a misleading impression of the accuracy which can be achieved when estimating carbon sequestration rates. Even in the case of habitat areas, it can often be difficult to define the extent of a particular habitat to any great level of accuracy. There are also considerable levels of uncertainty associated with the matching of habitat types with published sequestration values, and also in the precision of measurement within studies. The ability of this type of approach to ever establish precisely the sequestration rate of a habitat change is very limited and should be treated with caution and likely considerable over supply of land to ensure the stated benefits are achieved in reality. Establishing accurate and robust sequestration rates will present a significant knowledge gap for the Authority and likely prove a major obstacle to pursuing this offsetting strategy. There is no nationally agreed carbon accounting framework. However, many are facing similar issues and there is an opportunity for the Authority to work in partnership and help bring more clarity to this area of study.

¹⁷ Natural England (2012) 'Carbon storage by habitat'

To put this into practice as a rough example, the existing management plans for DNPA's five major land holdings at Holne and White Moor, Haytor, Plaster Down, Hawnes and Dendles and at the Wray Valley Woodlands are looking to create approximately 120Ha of scrub and woodland, 25Ha of heathland and 6Ha of valley mire by 2030. By using published sequestration rates, such as those above, it appears that, in theory at least, more than enough land exists to offset the Authority's unavoidable emissions on its existing land assets. However, more detailed analysis is required of the habitat changes occurring, the condition of the habitats establishing, and the relevance of the sequestration rates being applied before we can have any certainty of what is occurring in reality.

What is clear is that pursuing this project in a way which balances carbon sequestration objectives with biodiversity, climate change adaptation, water resources, air quality and other environmental indicators would use and build on the wealth of knowledge and experience within the Authority. It could better position DNPA to advise across the National Park and beyond, and prepare DNPA for the Government's emerging focus on nature recovery, emphasised in the Environment Bill, emerging Environmental Land Management Schemes framework, Glover Review, and emerging biodiversity net gain and Local Nature Recovery policies.

Offsetting Project 6: Purchase fuel from Shell

Cost required to offset:	£0 (75.1tCO ₂ e maximum offset)
£/tCO₂e:	
Project Summary:	
Shell have committed to offsetting the emissions associated with production and consumption of its business Shell Card customers.	
Businesses are eligible for using the Shell Card and it would replace DNPA's current fuel scheme. Limited Shell garage availability is a concern. Feasibility, costs and emissions of increased journey times to garages to be further considered.	

OFFSETTING COSTS

5.4 The below summarises the costs of offsetting for each costed scenario before and after implementation of the proposed action plan. It serves to emphasise the need to prioritise carbon reduction over offsetting.

	Offsetting for 2018/19 Scope 1 and 2 emissions	Offsetting for Scope 1 and 2 emissions after project implementation
Total tCO₂e	157	69
Community fund cost required	£29,830	£13,089
Purchasing renewable electricity	£98,286	£43,125
Tree planting within the park	£730,080	£303,630

PRIORITISING PROJECTS

5.5 Using project numbers from the action plan, the below evaluates how easy it would be to implement each of the proposed projects (where carbon saving information is available) against the potential climate benefit. It assists in project prioritisation, showing those projects that are a clear priority for action and those which are less so.

	Big	15			
			1, 5(3), 18		
Benefit			9	6, 8	2
	Small	4			5(1), 14
		Difficult		Easy	
		Ease of implementation			

5.6 When further detail about the proposed projects is available it is recommended that projects are mapped on a Marginal Abatement Cost Curve (MACC) which more accurately estimates the volume and cost of opportunities to reduce emissions in a given year.

5.7 Using this prioritisation it is possible to begin to establish a timeline for implementing the proposed projects.

Year	Projects
2020	Project 1: Purchase more fuel efficient vehicles Project 2: Promote travel alternatives Project 5: Purchase renewable energy (option 1) Project 6: Installation of Solar PV at Haytor Visitor Centre Project 7: Audit of high demand electrical items Project 9: Install LED lighting to Parke Car Park Project 11: Carbon footprint Land Assets Project 14: Scope digital by default Project 15: Scope encourage sustainable commuting Project 19: Scope Behaviour change campaign
2021	Project 1: Consider case for electric vehicles Project 5: Purchase renewable energy (option 2) Project 8: Convert electrical shower (consider refurbishment) Project 14: Implement digital by default Project 15: Implement encourage sustainable commuting Project 16: Review procurement strategy for Visitor Centres Project 18: Review Enjoy Dartmoor magazine distribution strategy Project 19: Implement behaviour change campaign Offsetting Project: Scope habitat restoration on DNPA Land Assets
2022	Review Carbon Action Plan Project 1: Consider case for electric vehicles Offsetting Project: Evidence habitat restoration on DNPA Land Assets
2023	Pursue alternative offsetting project if necessary

6. Conclusions and discussion

6.1 This climate action plan has broadly assessed Dartmoor National Park Authority's carbon emissions. The plan should be seen as 'work in progress' in that it will need to be reviewed and up-dated on a regular basis as our knowledge increases and we become clearer about feasible actions and priorities to reduce our carbon footprint.

6.2 The following offers a summary of the plan's findings a reflection on how the action plan should be viewed internally and externally, and how it should be embedded within the organisation.

- DNPA's existing carbon footprint is small, particularly when considered against the positive climate impacts inherent in the Authority's work seeking to conserve and enhance Dartmoor National Park
- DNPA's work to tackle its carbon emissions over the last decade is impressive, already exceeding international targets for emission reductions
- More can and must be done to continue this good work
- DNPA should prioritise securing renewable energy, reducing vehicle emissions, assisting staff to reduce their emissions, and promoting behaviour change
- DNPA should seek to better understand how its land assets are now and can in the future sequester carbon to offset emissions
- Implementing the projects in this action plan needs to be a corporate priority and built into the work programmes of all teams and staff. This

process has started. Our aim is for 'low carbon' to be part of our organisational culture.

- We will need to keep the Action Plan under review.
- The Plan will change as our knowledge increases, we share our learning and learn from others
- Whilst the focus of this plan has been on the organisation we need to be careful that our desire to be low carbon does not impact on our wider work programmes to make Dartmoor low carbon.

Summary of key actions from the draft Climate Change Action Plan for 2020/21

Theme	Key Action	Carbon saved tCO _{2e}	Cost
Be Lean	<p>'Climate Awareness Campaign' focused on staff and Members to:</p> <ul style="list-style-type: none"> - engage staff and Members and empower them to take small but practical steps such as switching off lights and not leaving windows open if the heating is on etc. To 'Think before you travel'. We recognise that meetings are a key and important part of the way we work and do business/build partnerships, but we want staff and Members to think before they travel– could they meet virtually using conference call, video conferencing, use a pool car etc. <p>Encourage car sharing between staff and Members where appropriate</p> <p>Modal shift – we have already revised our Cycle to Work scheme to make it potentially more appealing by increasing the maximum amount available to 'borrow' through the salary sacrifice.</p>	TBD	TBD
Be Clean	Review energy efficiency of our buildings	TBD	TBD
	Audit of high demand electrical items	TBD	TBD
	Led lighting in the Parke car park	0.608	Circa £2,000

Theme	Key Action	Carbon saved tCO _{2e}	Cost
	Digital by default – switch to paperless public meetings (ie. Authority, Development Management and Audit and Governance meetings) by the end of 2020/21	TBD	TBD
Be Green	Source renewable energy	42.4	TBD
	Install solar panels at Haytor National Park Visitor Centre	1	Circa £6,000
	Use our limited purchasing power and investments to contribute to a carbon neutral future	TBD	TBD
Offset	Commission a detailed study to calculate the carbon account of our land estate (i.e. the amount of carbon sequestered and the carbon emissions from current management) and make recommendations on how to maximise carbon capture from our estate whilst also delivering other benefits	TBD	TBD
	Subject to the findings of the carbon account we may need to develop an Offset Policy setting out how we will pay for our remaining carbon emissions to be offset. The Climate Action Plan outlines five off-setting options.	TBD	TBD

DARTMOOR NATIONAL PARK AUTHORITY

6 March 2020

RENEWAL OF ACCESS AGREEMENT – USE OF DISUSED RAILWAY WALKHAMPTON COMMON AND PEEKHILL FARM

Report of the Head of Recreation, Access and Estates

Recommendation: **That Members authorise completion of two access agreements at Peekhill Farm and Walkhampton Common as set out in paragraph 2**

1 **Background**

- 1.1 The Authority had access agreements along the route of the disused Princetown railway line between 1998 and 2017. The route runs across common land; land designated under the Countryside and Rights of Way Act (CROW) and enclosed farmland (see plan at Appendix 1). Between 2007 and 2017 the section of route across common land was included in a Higher Level Stewardship agreement, but provisions for access are not currently available through the Countryside Stewardship Scheme. Since 2017 there has not been any agreement in place for cycling the length of the route or for walking the section of route through Peekhill Farm and, therefore, public access to the route is not guaranteed.
- 1.2 The cycle route is very popular with both experienced off road cyclists and less experienced riders and families. The route is shown on the Authority's *Off Road Cycling Map* and is of strategic importance. The track also forms part of a circular route from the National Park Visitor Centre at Princetown and serves as a valuable recreational resource and economic asset. The lack of agreement on the route over the past two years means that we have not been able to actively promote the route or update information for cyclists. The surface of the track is durable and hence provides a safe and sustainable route giving enjoyment to many people, including people with limited mobility using tramper type vehicles. A people counter, installed and working on the site in 2015, showed 13,000 cyclists and over 25,000 walkers use the route annually. Unfortunately, the counter has been out of order for the past two years but plans are in place to replace the counters with more up to date models.
- 1.3 A new bridge to make safe the road crossing at Peekhill was delivered in 2015 funded through the joint DNPA/DCC Granite and Gears project. This bridge will be maintained by DCC .

2 **New Agreement for Peekhill Farm**

- 2.1 The landowners are interested in entering into new access agreements commencing on 1 April 2020 to formalise what is currently unauthorised access. Two agreements will be required; one for the Common/CROW Act land and one for the land through Peekhill Farm, reflecting different ownership; both will be managed by one agent. The owners have requested that the Authority install new people counters and aims

to erect information boards at appropriate locations along the route to help people better understand and enjoy the history, wildlife and farming activity of the area. This is to be welcomed. There are some works required to the surface at the south western end of the route; if the agreement is confirmed works will be undertaken in 2020/21 from within existing budgets/resources.

- 2.2 It is proposed that the two new agreements will contain the Authority's standard access provisions and payments; they will each have a term of 10 years, with a break clause at 5 years. Our standard access provisions are attached at Appendix 2. There is just one change from the standard provisions: the owner has asked that the Authority undertake annual management of hedges through Peekhill Farm. The hedges were erected in 2015 as part of the works to erect the new road bridge. Officers have considered this and are happy that it will not be a significant cost.
- 2.3 **Agreement 1 – Peekhill Farm** - The route is 1570 metres and the annual payment is £1,413.00 per annum plus a payment for reasonable legal fees (£400.00). The route is shown on the plan at Appendix 1 as a bold solid red line. The agreement provides for access on foot and cycle.
- 2.4 **Agreement 2 – Walkhampton Common** - The route is 7,420 metres and the annual payment is £3,339.00 per annum plus a payment for reasonable legal fees (£400.00). The route is shown on the site Plan at Appendix 1 as a solid blue line. The agreement provides for access on cycle only; access on foot is already provided.

3 Financial Implications

- 3.1 The financial commitment of the two agreements is £4,752 per annum plus a one off payment of up to £800 for legal fees. Members will note that the proposed new agreement is at standard payment rates.
- 3.2 It is proposed that the two new agreements will run for 10 years, with a 5 year break clause and therefore there is a longer financial commitment for the Authority which Members should note.
- 3.3 If Members agree to proceed, the annual payments for 2020/21 would be funded via the 2019/20 Project Fund as a commitment. Future payments would be built into the Medium Term Financial Plan as a core cost and ongoing commitment for the Authority.

5 Equality and Sustainability Impact Assessment

- 5.1 The route is a traffic free cycle route with gentle gradients and accessible gates along the route. It provides opportunities for everybody; the young, elderly or less fit will all find this route manageable and enjoyable.

6 Conclusion and Recommendations

- 6.1 The Authority has invested in securing access to the disused railway line between Princetown and Burrator for over 15 years. The Granite and Gears project enabled a significant and overdue improvement to the crossing of the B3212 by the erection of a new bridge. The route as a whole provides a strategic and well used recreational route for a range of users including experienced cyclists and family groups. Not only

is this route attractive for local people, it is also a draw for tourists. If we can finalise the agreement we can confidently promote the route via our Visitor Centre at Princetown. Without the agreement we are unable to promote the route and there is a real risk that access to the route, in the future, could be lost.

- 6.2 Given the strategic importance, the recent investment and improvements to the route and the level of use it receives, it is recommended that the Authority authorises the completion of two new 10 year access agreements, to allow walking and cycling along the section of the disused railway line at Peekhill Farm and cycling along the missing link to the disused railway on Walkhampton Common. These agreements will provide a safe, predominantly off road route between Plymouth and Princetown – promoting sustainable travel as an alternative to the car and contributing to our targets to reduce CO₂ emissions.

ANDREW WATSON

Background Papers: Authority Report NPA/09/004

Attachments: Appendix 1 - Site Plan
Appendix 2 - Standard Access Provisions

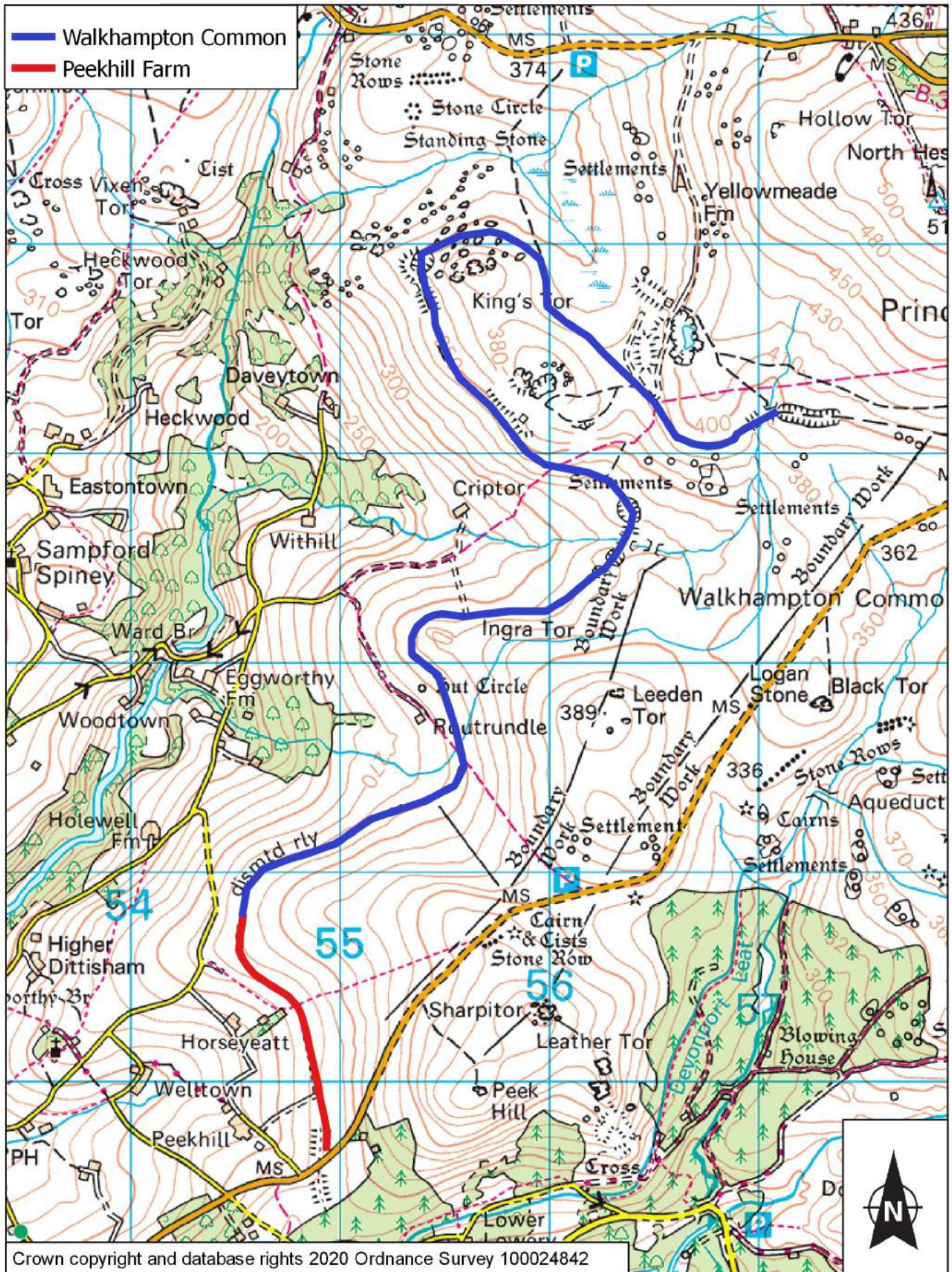
20200306 AW Princetown Railway Access Agreement

Princetown Cycle Way



Scale 1:24,999

Compiled by jmannning on 17/2/2020



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Standard Access Provisions

The Authority covenants as follows:

To undertake all reasonable and necessary works to ensure that the surface of the Route remains in a reasonable state of repair suitable for the agreed use and not materially worse than the condition at the date hereof **PROVIDED ALWAYS** that the Authority shall have no duty to repair or make good any damage caused or resulting in whole or in part otherwise than from the agreed use of the Route

To maintain all field furniture and gates on the Route which facilitate public access

To provide and maintain signs on the Land, in locations agreed by the Parties, to explain the access provisions under this Agreement

To be responsible for any claims by third parties in respect of the condition of the surface of the route and the maintenance of any signs and/or gates

To maintain proper and adequate insurance for any claim that may arise from the condition or maintenance of the route, field furniture, gates and signs erected under this Agreement.

To include the Route in normal patrols by the Authorities Ranger Service

The Owner and the Tenant separately covenant as follows:

- 1 To permit Access over the Route for the purpose of quiet recreation and enjoyment.
- 2 Except as is expressly provided for in this Agreement, or may from time to time be agreed in writing by the Parties, not to limit or restrict Access over the Route or make any request or requirement for payment or prior notice
- 3 To be responsible for erecting and maintaining boundary fences and planting and maintaining boundary hedges
- 4 Not to do anything or permit anything to be done on the Land which is likely to impede or discourage Access over the route for quiet recreation and enjoyment
- 5 Not to permit a bull to be at large upon the Land other than in accordance with the criteria set out in Section 59 (2)(a) and (b) of the 1981 Act
- 6 Not to exercise shooting rights on the Land or permit any person to exercise shooting rights on the Land so as to prevent or impede Access over the Route
- 7 To give not less than 72 hours public notice by signs placed at agreed points in the car park of any intention to exercise or permit the exercise of any shooting rights on the Land.
- 8 To maintain a valid policy or policies of insurance in respect of the Land, including cover for Occupiers Liability and Public Liability in a sum not less than £5 million

sufficient to meet any claim arising otherwise than from the condition or maintenance of the Route, field furniture, gates and signs erected under this Agreement.

- 9 Not to seek to temporarily suspend Access to the car park by agreement between the Parties save in exceptional circumstances such as:
- (i) serious damage to conservation value
 - (ii) exceptionally high fire risk
 - (iii) outbreak of notifiable disease
 - (iv) need for harmful or potentially dangerous management operations

DARTMOOR NATIONAL PARK AUTHORITY

6 March 2020

SHIPLEY BRIDGE CAR PARK AND TOILETSReport of the Director of Conservation and Communities**Recommendation: Members agree:**

- (i) **That the Authority agrees a Deed of Variation with South West Water (SWW) on our Head Lease and enters into a new 10 year Sub Lease with South West Lakes Limited (SWLL) for the management and maintenance of Shipley Bridge car park and toilets. Heads of terms for the proposed Sub Lease are detailed in paragraph 3 of this report.**
- (ii) **That the Authority supports the introduction, by South West Lakes Ltd, of formal charging in the form of pay and display parking, to fund the future management and maintenance of the site.**

1 Background

- 1.1 The Authority leases Shipley Bridge car park from South West Water (SWW). The Lease runs for a term of 99 years from the 29th day of September 1976 and allows the land to be used as a car park and toilets. There is no break clause. The Lease cannot be assigned or underlet other than to a district or parish council (for the purposes of running the toilet facilities) without consent from South West Water. The rent is £1.00 per annum. The Authority is responsible for any rates and taxes associated with the land and for maintenance. Under the Lease the Authority is not able to run commercial operations on the land.
- 1.2 The toilets, although on South West Water land, are owned by the Authority.
- 1.3 In 2005, through an exchange of letters, South Hams District Council took on full responsibility for the maintenance and cleaning of the toilet block. DNPA continued to be responsible for the car park. The Council has operated an honesty box at the site for a number of years to help fund the toilets.
- 1.4 In recent years South West Lakes Trust has authorised a mobile vending unit in the car park.
- 1.5 During 2019 South Hams District Council confirmed that it would be terminating its interest in the toilets from September 2019. Since September the Authority has been paying for the cleaning of the toilets. This was agreed with South Hams District Council to allow continued opening of the toilets whilst we continued to negotiate future arrangements to try and keep the toilets open in the longer term.

2 Future Management

- 2.1 South West Lakes Trust expressed an interest in managing the car park and toilets given the location close to the Avon Dam and reservoir. The Trust already has an

interest in the site through the mobile vending contract. The Trust has confirmed that it would install pay and display machines to raise income to fund management and maintenance of the toilets and car park (including cleaning of the toilets). This option was discussed with Members at the Park Management Working Panel in March 2019; there was a clear steer that Members would prefer not to take back responsibility for the toilets if alternative arrangements could be made.

2.2 Under the Head Lease the Authority would need to get a Deed of Variation from SWW before entering into a Sub Lease agreement with South West Lakes Trust; this would cover future management and maintenance of the toilets and car park, installation of pay and display meters and the ability to grant a trading licence which would require landlord's consent. Officers have been negotiating with SWW and South West Lakes Trust to agree terms for the Deed of Variation and Sub-Lease.

3 Proposed Sub Lease

3.1 Draft heads of term for the Lease are set out below and it is anticipated that these will be agreed by all parties before the meeting on 6 March 2020. Members will be alerted to any necessary changes at the meeting.

- The Sub Lease is for a term of ten years with effect from the 1 April 2020, with a break clause on the 5th anniversary (ie 1 April 2025) subject to six months' notice.
- The annual rent to be a nominal £1 per annum if demanded.
- DNPA will carry out a spring clean of the WCs prior to the grant of the Sub Lease during March 2020.
- South West Lakes Ltd shall be responsible for keeping the repair and decoration of the buildings erected on the site and the maintenance of the car park and remaining environs in no worse condition than evidenced by a photographic schedule of condition to be completed prior to the completion of the Sub Lease.
- South West Lakes Ltd to be responsible for maintaining, servicing, testing, repairing and inspecting, all items of plant and equipment at the Premises to keep them in good working order and condition throughout the Term.
- South West Lakes Ltd to use the demised premises for the purposes of a car park and toilets only.
- Installation of Pay & Display Car Parking Meters. Subject to the Head Landlord's consent South West Lakes Ltd will be permitted to install car parking meters provided that the meters are removed if so required by the DNPA (or Head Landlord) and reinstate the site to the reasonable satisfaction of the DNPA prior to the expiry date of the Sub Lease.
- South West Lakes Ltd will install pay and display machines and introduce car parking charges for the car park within the demised land of £2 for up to two hours and £4 for all day parking. Any review of these car parking charges are to be agreed with the DNPA.

- South West Lakes Ltd shall not make any alterations to the premises during the term of the Sub Lease.
- The Sub Lease will not permit South West Lakes Ltd to assign, sub let or part with possession (including hiring) the whole or any part of the demised premises, apart from the granting of a trading licence (for mobile vending) subject to DNPA approval.
- South West Lakes Ltd will be responsible for all electricity, gas, water charges and any other outgoings from the use and occupation of the premises.
- South West Lakes Ltd will be responsible for any business rates.
- South West Lakes Ltd shall maintain Public Liability and Third Party Insurance in the sum of £5m or such other amount as the Dartmoor National Park Authority may specify from time to time.
- South West Lakes Ltd to arrange buildings and contents insurance cover for the toilet block (and any other infrastructure installed?).

3.2 The above terms and conditions are subject to contract.

4 Financial Implications

4.1 DNPA will contribute £500 plus VAT towards South West Water's costs for the preparation of the Deed of Variation. The Authority and South West Lakes Limited shall be responsible for their own costs in this matter.

4.2 Members should note that there are financial obligations for the Authority in the Head Lease. If the Sub Lease is not agreed the financial responsibility for maintaining the car park and toilets would fall to the Authority. If the Authority wanted to close the toilets, permission would be required from the landlord (SWW) and SWW has alerted officers of our contractual obligation to keep the property "free of all rubbish and litter and to make proper arrangements for the disposal and removal thereof". If the Authority were to close the toilets, it would need to provide assurances that the property will still be managed appropriately and that SWW's land is not fouled on, leading to odour and fly problems and at the close of the Lease there would still be a requirement to reinstate the land in full. Clearly there remain financial implications here which cannot be avoided by the Authority.

4.3 The estimated annual costs of maintaining the car park and toilets is £8,000 based upon figures from South Hams District Council and our own costs to repair the car park over the past five years.

4 Conclusion and Recommendation

4.1 The toilets and car park at Shipley Bridge are a well-used, year round visitor facility. This site provides good access for the south moor for those wanting to explore further and the easy access path leading from the car park to Avon Dam is used by

a range of people including families with young children and less mobile visitors. Closure of the toilets at this location is not desirable.

- 4.2 South Hams District Council gave notice to stop cleaning the toilets at Shipley Bridge in September 2019. Over the past year the Authority has been negotiating with SWW and South West Lakes Ltd to try and find a long term solution to keep the toilets open. A clear steer from Park Management Working panel was to try and find alternative arrangement for the site.
- 4.3 South West Lakes Ltd has expressed an interest in taking responsibility for the car park and toilets; given the location close to the Avon Dam, it is a good place to tell the story of water from the Moor. In order to do this South West Lakes Ltd will need to introduce formal car park charges to fund the management and maintenance costs. This is understandable and reflects the approach adopted by South West Lakes Ltd across its other sites. This would be a good solution which works for both parties.
- 4.4 A Deed of Variation to our Head Lease with South West Water and a new Sub Lease with South West Lakes Ltd is required to implement the proposal. The cost to the Authority is minimal; £500 costs to South West Water and a deep clean of the toilets before the exchange takes place with South West Lakes Ltd. In the longer term this will prevent additional costs for the Authority to maintain and manage the facilities at Shipley Bridge.
- 4.5 It is recommended that the Authority agrees a Deed of Variation with South West Water on our Head Lease for the site and enters into a new 10 year Sub Lease with South West Lakes Limited South West Lakes Ltd for the future management and maintenance of Shipley Bridge car park and toilets. With consent from South West Water, as landowner, it is also recommended that the Authority supports the introduction by South West Lakes Ltd, of formal charging in the form of pay and display parking to fund future management and maintenance of the site.

ALLY KOHLER

DARTMOOR NATIONAL PARK AUTHORITY

AUDIT AND GOVERNANCE COMMITTEE

Friday 7 February 2020

Present: Members
K Ball, A Cooper (Chairman), G Gribble, P Harper, G Hill, J McInnes,
C Pannell, R Parkinson, P Sanders, D Webber

Officers
K Bishop, A Kohler, D Healy, N White, A Watson (part), S James (part)

In attendance: Nigel Tigwell (Independent Person)

Apologies: J Nutley, P Vogel, P Woods

516 Minutes of the meeting held on 1 November 2019

The minutes of the meeting held on 1 November 2019 were signed as a correct record.

517 Declarations of Interest

None.

518 Items Requiring Urgent Attention

None.

519 Public Participation

None.

520 Internal Audit Report – Key Financial Systems Review 2019-20

Members received the Key Financial Systems Review 2019-20, presented by Mr Robert Hutchins, Head of Devon Audit Partnership.

Mr Hutchins drew Members' attention to Section 2 of the report – Audit Opinion. He advised that a 'High Standard' opinion has been given which Members can draw comfort from. Only minor recommendations have been made with the aim of further enhancing the Authority's already sound procedures. Section 4 provides more detail of areas covered in the review.

In response to a query, Members were advised that the National Park Authority has always maintained high standards. Recommendations are accepted by management who also ensure that issues raised are resolved promptly.

The Deputy Chairman recorded Members' thanks to the Head of Business Support, her Finance Team and the wider cohort of Authority staff for these excellent results.

521 Financial Management 1 April to 31 December 2019 and Forecast Financial Outturn 2019/20

Members received the report Head of Business Support (NPA/AG/20/001).

The 2019/20 net budget, approved by the Authority in March 2019, is funded from National Park Grant (NPG) (this is the last year of a confirmed three year settlement period), fees and charges, external grants and partnership income, together with our own reserve balances. Various work programmes and associated income streams were brought forward from 2018/19, which means that the net budget has increased by just over £31,000. Based on the current status the forecast is for a potential surplus of £116,998 at the end of the financial year. This is due to increased income, as outlined in section 2.3 of the report. External grant income has increased significantly, due in no small part to the successful submission of external funding bids or levered in partnership contributions for projects. The Authority has also been awarded a 100% capital grant for Postbridge Visitor Centre. A breakdown of the external funding received to date is detailed in section 2.4. Some external funding will inevitably be carried forward as projects span more than one financial year.

With regard to the variance analysis there are no surprises, most of the variations have occurred due to planned and managed interventions during the year. However, items not in our control include advertising income from Enjoy Dartmoor and information boards which is forecast to reduce and recruitment costs which are not planned for. The Pre-application service was paused for a while due to staff shortages but is now operating again and the fee income is recovering.

The Head of Business Support drew Members' attention to the following projects:

Postbridge VC interpretation project (part of the *Moor than meets the eye* project) - part funded by Heritage Fund Grant income and Authority reserves. Phase 1 was completed before the centre closed; Phase 2 (funded from our own resources) will be implemented once the extension is complete (May 2020). Officers have submitted claims to the Heritage Fund which, if successful, could reduce the costs incurred up to the end of February 2020.

Postbridge VC extension project – revenue costs incurred to enable a bid to be submitted are just under £128k and have been met from our reserve balances. The build has now commenced, and is 100% externally funded. The contractor is making good progress.

Moor Otters II – the project is well underway, funded from reserves, a separate report features elsewhere on the agenda.

Moor than meets the eye – this scheme is almost complete and formally ends at end of February. The Project Manager is focused on maximizing as much draw down of grant as possible. It is anticipated that there may be an additional contribution required from the Authority of around £30k to balance the books at the very end; this will be met from reserves.

With regard to the Project Fund, this is an unallocated pot of money that allows officers to bid for money in-year to enable new unplanned projects to start, to add capacity to teams if required and meet unforeseen expenditure and pressures. Details of these are set out in section 2.7 of the report.

With regard to the Capital Programme, the Head of Business Support advised that the replacement of Ranger vehicles has been delayed whilst an analysis of the full fleet requirement has been undertaken; this is now progressing. Whilst the Authority is debt free and has no plans to borrow the other prudential indicators do not apply. However, sections 3.4 to 3.6 set out a summary of the implications of a new accounting requirement that comes into effect from 1 April 2020 i.e. the 2020/21 financial year. This means that all current “operating leases” must be treated as “finance leases” and both an asset and a liability must be brought onto the balance sheet, e.g. for vehicle, land and property leases. This will entail a considerable amount of work by the Head of Business Support and the Authority’s external valuer, in consultation with auditors. The work has started, but will not be completed quickly. There are also implications for the setting of the 2020/21 budget as clearly there are now Prudential Indicators that apply.

The 2020/21 Budget and new Medium Term Financial Plan is being worked up and therefore reserve balances may change. New provisions set aside since the budget was approved in March include £50k for climate change and £120k for Moor Otters II.

The Authority is yet to be advised of the level of NPG for 2020/21. However, we do know that it will just be a one year settlement, and that it will be challenging – negotiations are on-going. A one year settlement also makes long-term business planning very difficult.

The current forecast surplus of £116,988 represents a minus 2.76% variance against budget, this is primarily income related, which is a good news story. Since writing the report the Authority has successfully disposed of a whole range of obsolete equipment, a trailer and two tractors which has resulted a further £29K of income. This will be used to offset the cost of a replacement vehicle for the Conservation Works Team next year. Budget management is being closely monitored and challenged; Members will be kept informed if new pressures arise that give rise for concern.

In response to Member queries, the Chief Executive (National Park Officer) advised that there is no indication of when the Authority may receive notification of NPG for 2020/21. The Authority is aware that Defra officials have made recommendations to Ministers. The Head of Business Support drew Members’ attention to Appendix 4 which provides details of Reserves, particularly the £52k held in relation to employees, covering maternity/paternity cover and pay awards. This reserve would cover an extra 1% pay increase if awarded. Members commented that whilst it was impressive to see that staff have managed to bring in additional funding during the course of the year to date, it was important to note that this is non-recurring funding and therefore cannot be relied upon year-on-year.

RESOLVED: Members NOTED the content of the report.

522 Fees and Charges 2020-21

Members received the report of the Head of Business Support (NPA/AG/20/002). The Authority is required by Government to generate income streams whenever possible and lawful to do so. This does not include planning fees which are set centrally by Government. A formal review of the fees and charges is undertaken annually as part of the budget setting process. Appendix 1 to the report details the forecast outturn.

Many charges remain the same for several years as they are so small it would be inefficient to increase them by small amounts; this is one of those years.

With regard to car parking charges, the Authority started formal charging at Princetown in 2013; Haytor, Postbridge and Meldon followed in 2017. Payments received from parking (once costs of provision are deducted) are used to maintain and improve the car parks and ancillary infrastructure. The current charges are modest; once VAT and processing costs have been deducted the net amount received is reduced by at least 25%. In March 2019 when the 2019/20 budget and Medium Term Financial Plan was presented to Members, attention was drawn to the fact that there was a need for a significant car park resurfacing programme. Around £90k is spent annually on operational and maintenance costs (this does not include staff time). At that time, Members determined not to increase charges, rather, asked officers to look at a season ticket / permit scheme. This was not considered viable.

At least £90k will be required to cover the cost of maintenance of car parks and associated infrastructure.

Having undertaken some financial modelling based on the historical and, therefore, anticipated usage of the car parks, Members discussed various revised charging rates:

Half day	from £1.00 to £2.00
Full day	from £2.00 to £3.00
Blue badge	from £1.00 to £2.00
Coaches	from £4.00 to £5.00

which could potentially provide an income of between £95 and £115k. The Authority could also install card readers for non-cash payment. In response to a Member query regarding the possible withdrawal from the Service Level Agreement with West Devon Borough Council regarding the car park at Princetown, the Head of Business Support advised that one month's notice would be required. This service would need to be replaced with more G4S collections, ticket roll replacement etc. Members commented that they were in support of the installation of card readers; the Authority needs to ensure that it is up to date with technology and ensure every payment option is covered.

A Member commented that visitors arriving by coach are using a more sustainable form of transport than those using a private motor car; the Authority should bear this in mind when raising prices. Members are aware that other Local Authorities are

planning to increase their prices and, therefore, DNPA would not be alone in making changes.

In response to other Member comments and queries, the Head of Recreation, Access and Estates advised that all of the parking meters are relatively new, the oldest ones being situated in Princetown. These are, however, the most reliable, due to their being connected to mains electricity. If prices were to increase the changes to the tariff software would cost £200 per machine; signage is undertaken in-house. Card readers would be an additional cost of £1500 per machine.

Mr Sanders proposed the following to be recommended to the next Authority meeting on 6 March 2020:

- (i) Increase in charges as follows:
 - Half day from £1.00 to £2.00
 - Full day from £2.00 to £3.00
 - Blue Badge from £1.00 to £2.00
 - Coaches from £4.00 to £5.00;
- (ii) Add Card Readers to all machines;
- (iii) Revisit the current Service Level Agreement (SLA) with West Devon Borough Council, with a view to possible withdrawal from the SLA to mirror Postbridge and Haytor.

The proposal was seconded by Mr Gribble.

Mr Ball declared a personal interest in this agenda item due to his being a member of West Devon Borough Council.

- RESOLVED:** Members:
- (i) recommended a forward looking strategy to go before Authority as follows
 - Increase in charges as follows:
 - Half day from £1.00 to £2.00
 - Full day from £2.00 to £3.00
 - Blue Badge from £1.00 to £2.00
 - Coaches from £4.00 to £5.00;
 - Install Card Readers to all machines;
 - Revisit the current Service Level Agreement (SLA) with West Devon Borough Council, with a view to possible withdrawal from the SLA to mirror Postbridge and Haytor.
 - (ii) recommended that the Authority approves the 2020/21 schedule of fees and charges as set out in Appendix 2, amended as per (i) above.

523 Business Plan Monitoring 2091/20

Members received the report of the Head of Organisational Development (NPA/AG/20/003). He informed Members that the report outlines the Authority's performance, at quarter three, in delivering the 21 key actions in the current Business Plan. Key Action 21 was added to the Business Plan Monitor following the declaration of a Climate Change and Ecological Emergency by the Authority in July 2019.

Members were advised that no further work is planned with regard to two projects – ‘Terrific Towns and Vital Villages’ (Action 13) and work to develop the Food Economy (Action 14) – unless external funding can be secured.

In response to a Member query the Chief Executive (National Park Officer) confirmed that with regard to Action 21 - Climate Change and Ecological Emergency, the Authority is working as part of the Devon Climate Emergency Response Group.

With regard to Action 1 – relating to the new Environmental Land Management System (ELMS) – a new officer has been recruited and has commenced work. After long negotiations with Defra the contract was issued in November/December 2019. The Authority’s contribution towards the ELMS project – Test and Trials is an 18 month programme and consists of four elements:

- development of a Payment by Results proposal for common land;
- land management plans for Commons and home farms;
- role of the National Park Authority – local priorities setting;
- blended finance – public and private money eg., South West Water contribution of £27k.

The national pilot is due to commence in 2021 and will run until at least 2024. Full introduction is set for 2027.

Mr Sanders proposed that the Authority’s level of success was to be commended; he requested that praise for officers be formally recorded, which was seconded by Mr Ball and agreed by Members.

RESOLVED: Members NOTED the content of the report.

524 Performance Indicators 2019/20

Members received the report of the Head of Organisational Development (NPA/AG/20/004). He stated that the report sets out the indicator targets agreed for 2019/20 and progress to date at the end of the third quarter (31 December 2019). He advised that those indicators shaded amber are, in most cases, cumulative indicators where it is possible that the target will not be met.

There are continued improvements with regard to reducing sickness absence levels. With regard to Member attendance at formal committee meetings (S14), this rose during quarter three, resulting in the year to date attendance meeting the target. The Development Management team is now close to full strength and it is hoped that performance will improve in the coming months. With no appeals having been allowed during quarter three, this is a good reflection of the Authority’s decision making and policy framework.

The staff survey, carried out in November 2019, was completed by 75% of staff. Most responses were positive, which is good news, particularly in light of some uncertainties such as Brexit, the Glover Review and future funding. Responses are to be benchmarked against other National Park Authorities and this will inform the planned review of the Organisational Development Strategy during 2020/21.

A Member suggested that some of the targets should be revisited, in particular, the targets around social media use.

The Head of Organisational Development introduced the Deputy Head of Development Management and the Planning Officer (Enforcement & Development Management) who attended the meeting in order to provide an update on Enforcement, detailed below.

The number of 'new cases' received during the past couple of years had gradually reduced. The Authority continues to be successful in resolving cases without having to resort to formal legal action – consistently over 90% success rate over the past five years. The number of 'active cases' currently stands at 132; this is a real achievement as the Authority currently has only one dedicated Enforcement Officer.

With regard to Enforcement Appeals, the average success rate over the last five years stands at 70%.

A notable achievement for 2019 is the cessation of the unauthorised residential use of land at Steward Wood and the removal of all unauthorised structures. This case commenced in 2000; it involved five planning applications, eight enforcement notices, an injunction and three public enquiries.

There are, currently, no major enforcement cases being investigated. Smaller, but no less important to the complainant and the landowner, are issues regarding field shelters, caravans, containers and sheds, as well as changes of use of buildings and land. These need to be investigated in order to maintain good customer service and the Authority's reputation.

In response to a Member query the Deputy Head of Development Management advised that some monitoring of S106 Agreements is undertaken by the Forward Planning Team but this is not done routinely. The Planning Officer (Enforcement and Development Management) advised that he carried out a number of site visits on behalf of Forward Planning in 2014/15 to ensure that works had commenced; this proved very effective but has not been repeated. With regard to the regular surveys that are made regarding occupancy issues, letters regarding ancillary accommodation are scheduled to go out in March 2020. This is done every four years in order to avoid the risk of immunity. A review of Enforcement processes was last carried out in February 2014; a lighter review is due to be undertaken this year.

The Chief Executive (National Park Officer) thanked the Planning Officer (Enforcement and Development Management) and the Deputy Head of Development Management. The way in which they handle enforcement cases is to be commended. They are respected by the public. Members echoed his comments and thanks.

RESOLVED: Members NOTED the content of the report.

525 More Moor Otters Dartmoor Public Arts Initiative

Members received the report of the Marketing and Fundraising Officer (NPA/AG/20/005).

In May 2019 Members agreed to support the development of a public arts trail for 2020 and allocated £120k from reserve balances.

The project is picking up speed with sponsorship coming from South West Water in the sum of £10k plus a lot of 'in kind' support from other organisations including The Jolly Roger, Bovey Castle, Western Morning News, Bearnas Littlewood & Hampton, Mail Boxes Ltd, BRS Images and Absolute PR and Marketing.

60 otters will be positioned on five trails. Four of these will be across Dartmoor and one will be in Plymouth for the Mayflower celebrations. 20 of these otters will be situated in gateway towns.

Sustainability is a key theme for the trails and a variety of transport methods will be suggested. The Plymouth trail will be walkable. The public will be encouraged to use public transport, the Haytor Hoppa, car share, cycling etc for the other trails. In addition, the trail maps will be made available on-line as well as printed, messaging throughout will be on how to be a sustainable otter spotter. Plinths will be used to display interesting facts about otters on Dartmoor.

With regard to the schools project, around 55 smaller models (48cm in height) will be distributed to nine schools on Dartmoor plus one other in Plymouth, for students to decorate as exam relaxation, group art and other projects. These will be exhibited at Princetown Visitor Centre in August 2020. Certificates will be awarded and schools will be able to auction their own otters to raise funds for the school.

It remains for the few remaining hosts to be secured and the trails to be finalised; maps, catalogue and promotion materials to be written; schools secured; organise the Bovey Castle launch and a few other pieces of work to be completed.

The More Moor Otters Dartmoor Public Arts Initiative is, as Members stated, a good news story. An impressive amount of work has been undertaken to date; the potential for public engagement is incredible.

RESOLVED: Members NOTED the content of the report.