

Exmoor National Park Partnership Plan 2018-22

Consultation draft, September 2012

Consultation responses via email and online response form

The following table lists all the comments received on the draft Partnership Plan, in Plan order with the response and recommended action.

Responses received from:

001 Devon Cattle Breeders Society	018 Forum 21
002 RSPB	019 Individual
003 Exmoor Link Federation	020 Individual
004 Greater Exmoor Shoots Association	021 Woodland Trust
005 Highways England	022 Exmoor Society
006 Individual	023 Selworthy and Minehead Without Parish Council
007 Somerset Wildlife Trust	024 Exton Parish Council
008 Sport England	025 Exmoor Rivers and Streams Group
009 Brompton Regis Parish Council	026 Heart of the South West LEP
010 Devon Wildlife Trust	027 Individual
011 Individual	028 Lynton & Barnstaple Railway
012 South West Coast Path Association	029 Individual
013 Historic England	030 Individual
014 Individual	031 Individual
015 NFU	032 Exmoor Uprising
016 FWAG SW	033 West Somerset Council
017 Natural England	034 Kentisbury and Trentishoe Parish Council

No.	Respondent	Comment	Response & recommended action
Overall			
1.	Brompton Parish Council	At its meeting on 4th October Brompton Regis Parish Council considered this document and noted that the ambitions within it are well reflected in other National park plans, notably the Local Plan, and we welcome this.	Noted.
2.	Devon Cattle Breeders Society	You refer in a number of places to the importance of indigenous breeds of farmed livestock to the Park. We thoroughly endorse this view. However, when you refer to the specific breeds could you please replace your reference to "Red Devon cattle" with "Red Ruby Devon cattle" which is the correct nomenclature for the breed. It is a minor detail but good to get right for the avoidance of confusion by readers	Noted and agreed. We will make these changes in the document apart from the special qualities, which are not being changed to ensure that they are consistent with the newly adopted Local Plan
3.	Exmoor Link Federation	On behalf of the Exmoor Link Federation (East Anstey and Bishops Nympton Primary Schools) I would like to add my endorsement to this draft plan. I have read the full draft and agree with all ambitions included within the plan. Each section shows good merit and as learning partners with the national park I would like to suggest that this is adopted. The only additional comment I have is that the learning partnerships could receive a slightly higher profile.	Noted.
4.	Individual (006)	The ambitions need some targets that can be used as measures of success. Quantifying where we want Exmoor to be in X years time is a useful tool – even if it is sustaining 95% open access; 80% of moorland in good condition (with a definition for good). It is not about certainty, but about having a means of knowing where you are in relation to your ambition. Have we improved, under-performed, stood still?	Noted. It was decided not to identify specific targets for the Plan. Measures of success will be developed with the partnership groups

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		The other area for me is the relationships between the various ambitions and how they fit into a strategy map. How does improvement in one relate to the other .This helps develop what we have to do to achieve the ambitions and how we then continue to assess progress and adapt to change over time. A fundamental question for me is How do we create value for Exmoor stakeholders (residents, visitors, taxpayers, people off the moor who are impacted by it etc)	as part of the Delivery Programme
5.	Devon Wildlife Trust	There is no mention in this document of wild places in general, recognising the value of places where management is/could be limited or removed and where wildlife is able to set the pace of change. This would be a strong action to address climate change resilience and could affect many of Exmoor's habitats including: streams and rivers, woodlands, coastal areas (terrestrial and marine), grassland, moorland and mires.	There is a specific Ambition under 'Place' that refers to Exmoor being somewhere you can experience wildness. There is no policy to actively 're-wild' parts of Exmoor, although it is recognised that Exmoor's landscapes are constantly changing and in some areas the lack of management is leading to natural processes of vegetation change, and others where natural processes are being allowed to take their course

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6.	South West Coast Path Association	We welcome the ambitions set out in the draft plan, and wish to continue and enhance our work in partnership with the Authority to help deliver those ambitions, where appropriate to our objectives	Noted
7.	Historic England	Thank you for the opportunity to comment on the Partnership Plan. We won't be commenting on this occasion, but wanted to take this opportunity to say that we are pleased that our own partnership with you on matters relating to the Park's outstanding historic environment is positive and constructive	Noted
8.	Individual (014)	What proportion of the National Park is owned by the National Trust and what control do you have over their activities?	The National Trust owns around 2,000ha of land across Exmoor and is a partner in helping to deliver the Partnership Plan. The National Park Authority does not have any control over their activities or that of any other landowner, apart from our statutory functions (for example in relation to planning).
9.	NFU	We see this plan as very good and well laid out. It has a strong sense of purpose and is clearly both ambitious and focused on delivering quality. From a farming perspective it recognises the importance of farming but we would suggest that this could be made more overtly. Perhaps this can be done through the foreword?	Noted and agreed
10.	Natural England	Whilst we do not disagree with the plan, we would like to have seen a plan that is more ambitious and seeks to achieve greater environmental	The intention of the Plan was to be

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		<p>improvements than this consultation version. We note that the plan aims to identify opportunities and set ambitions for the next five years. In that light we suggest that the plan could contain:</p> <ul style="list-style-type: none"> • Ambitious restoration targets like the National Trust’s Land Outdoors and Nature Strategy; • Some inspirational place based projects such as landscape scale restoration along the coastal strip; • Lawton-inspired habitat initiatives, such as lowland heathland restoration from conifers, or woodland creation linking existing ancient woodlands and restoration of Plantations on Ancient Woodland Sites (PAWS); • Reversing declines in farmland wildlife by delivering better targeted schemes or selected de-intensification; and • Embracing more sustainable land management techniques such as catchment sensitive farming, natural flood management, soil husbandry and rewilding/naturalisation. 	<p>ambitious but also reflect the uncertainty over future policy, funding and delivery mechanisms. Many of the Ambitions such as the ones for wildlife and moorland are very ambitious, given the current trends which are heading in the opposite direction. The suggested bullet points would fit within the Place and Prosperity Ambitions and actions to take these forward with partners such as NE and NT could be highlighted in the Delivery Programme</p>
11.	Exmoor Society	<p>The Society recognises and supports the need to consult a wide range of people and organisations and commends the Authority for doing this so comprehensively. The well-illustrated plan is expressed in good clear language and is not as long or as detailed as previous ones, but with more straightforward aims and linkages, yet lacking clear targets and expected outcomes. The structure follows the other plans with the welcomed additional section of component landscapes where people, place and prosperity come together.</p>	Noted

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		Although the document is prepared by a public body, care must be taken not to sound too technical and mechanical or only concerned with any economic development; it should be counterbalanced by reference to the spirit of this unique place.	
12.	Exmoor Society	The emphasis on flexibility is understandable in these challenging times over the next 5 years, but leaving out any specific targets/milestones is questioned as going too far and will make monitoring the plan's successes and failures impossible. With no reference to the successes and failures of the last plan, what are the key priorities in the short term as opposed to the long term in the new one? Although partnerships are regularly mentioned there is usually only reference to the Authority's contributions. Each partner's expected or requested role and past contributions should be clearly identified and acknowledged e.g. private farmers, foresters and landowners proving extensive permissive access.	Noted. It was decided not to identify specific targets for the Plan. Measures of success will be developed with the partnership groups as part of the Delivery Programme. This will identify delivery partners
13.	Selworthy and Minehead Without Parish Council	The PC would like to support the Plan but has no comments	Noted
14.	Exton Parish Council	Exton Parish Council support the Plan and does not have any comments.	Noted
15.	Exmoor Rivers and Streams Group	We commend the general approach taken to the plan and in particular its simplicity and accessibility.	Noted
16.	Heart of the South West LEP	As is clearly described throughout the Plan, Exmoor national Park is an outstanding natural asset which forms a significant part of the "USP" and distinctiveness of the HotSW LEP region. In addition to the value of the visitor economy and the contribution made by the agriculture and food sectors in the Park, the natural capital of the area enhances the quality of life across our area. These are strengths that are reflected in the HotSW LEP Strategic Economic Plan which recognises the importance of our high-	Noted

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		<p>quality environment, tourism, agri-food and land-based industries and our social enterprises and communities.</p> <p>The HotSW LEP has been active in working with Exmoor National Park Authority and Local Nature Partnership colleagues across the region on how best to recognise and represent the value and potential of the region's unique environmental assets as natural Capital for input into future economic development strategies and plans. The Exmoor Partnership Plan is clearly consistent with this line of thinking and approach.</p> <p>We note that the Plan also includes a clear emphasis on prosperity and a strong sustainable local economy with vibrant communities and businesses supported by effective and efficient infrastructure networks. We support these aspirations which are in close alignment with the priorities for growth as set out in the HotSW LEP Strategic Economic Plan. We welcome the opportunity to engage with you going forward as your plans develop.</p>	
17.	Individual (027)	The emphasis of the Partnership Plan is (largely and correctly) about maintaining the special qualities of Exmoor, and also increasing accessibility for more people, more recreational facilities, more special event days and more user friendly paths.	Noted
18.	Kentisbury and Trentishoe Parish Council (034)	Kentisbury and Trentishoe Parish Council are encouraged that we are all working together and that local people have been listened to and building on the excellent work of the past.	Noted.
Our Vision (page 4)			
19.	RSPB	We have no specific comments on the individual statements that form the vision, other than when looking at them collectively, they do read as if produced in isolation, rather than forming a single cohesive vision. There are also some inconsistencies which could be ironed out, for example, some of the statements refer to raising awareness of a particular theme (landscape, historic environment), others do not, but arguably there is an equal need/opportunity for awareness raising across the themes. There is	Noted. It was decided not to amend the Vision at this stage as it is a joint vision with the newly adopted Local Plan.

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		also a general statement about raising awareness of the National Park, so perhaps there is scope for streamlining this a bit more?	
20.	Devon Wildlife Trust	<p>Point 2: requires mention of resilience to climate change</p> <p>Point 5: could Exmoor be better than carbon-neutral with its resource of mires and woodlands?</p> <p>General: There is no vision item on science, evidence, new technologies or innovation – inclusion of this this would send a strong message about robust decision making and forward thinking.</p>	Noted. It was decided not to amend the Vision at this stage as it is a joint vision with the newly adopted Local Plan.
21.	NFU	<p>The vision appears to be a list of objectives that are important to Exmoor and reflect the special qualities of the National Park. Traditionally a vision is a short statement that encompasses the big picture for ENPA and envisions where the ENPA is heading long term. Based on the list in the current vision the following could be an option</p> <p><i>“Exmoor National Park goes beyond maintaining the status quo and constantly strives for doing more and better for its people, environment, wildlife and businesses. Farming and forestry are the heart of Exmoor and enabling and growing them helps the soul of our communities and landscapes.”</i></p> <ul style="list-style-type: none"> - Landscape – agree but perhaps need to express who needs to be aware of its’ importance. Are these the local communities or farmers or lobby groups or tourists? What will they do with this information and what is it that the landscape could and or should be? Is this linked to planning in which case there needs to be an understanding that some changes to landscape in terms of buildings will help to ensure farming can remain viable. - Wildlife habitats – we support this objective. - Historic environment – we support this objective - Natural resources – we support this objective - Carbon-neutral – whilst we support this can the objective not be to be carbon- neutral? What does being carbon neutral look like for ENPA? Can it be achieved? 	Noted. It was decided not to amend the Vision at this stage as it is a joint vision with the newly adopted Local Plan.

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		<ul style="list-style-type: none"> - Public awareness – we support this objective. - Communities – we support this objective. - Strong, diverse and resilient economy – we support this objective and see this as a the key to Exmoor. Need to define “high quality food” . Is this branded Exmoor and food with a story? Is this value food which is still at a high standard or more expensive food which delivers much more across the different natural and social capitals? 	
22.	Individual (020)	It is pleasing that bullet point 7 includes Exmoor's communities retaining a continuity of connection with the land. I’m disconcerted however by the proposition “that communities are taking the lead in shaping future development to meet their needs and aspirations including access to services, housing, communications and infrastructure”. It is not clear how this relates to the National Park’s statutory purposes? Nor do they I suspect have the necessary expertise?	Noted. It was decided not to amend the Vision at this stage as it is a joint vision with the newly adopted Local Plan.
Special qualities (page 5)			
23.	RSPB	Good to see the addition of important bird populations in the fourth bullet.	Noted. It has subsequently been decided not to make any changes to the special qualities as these are also listed in the newly adopted Local Plan and Landscape Character Assessment and it would be confusing to have different wording for the special qualities in the Partnership Plan.

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24.	NFU	We agree with all of the special qualities but as a farming organisation we would see the relationship of the farmer with the land as the key quality and the one that drives all the others. To this end this should be at the top. We would also link this with livestock farming in general and not necessarily link it with any particular species but more good management and best practice.	There is no intention of priority given in the list of special qualities
25.	Individual	If an opportunity crops up, consideration should be given to adding to the Special Qualities a fuller account of the distinctive qualities of Exmoor settlements?	Noted
26.	Exmoor Rivers and Streams Group	bullet point 2 – Amend to read <ul style="list-style-type: none"> • A distinct and diverse landscape of softly rounded hills and ridges, with heather and grass moors, spectacular coast, deeply incised wooded valleys, high sea cliffs, <u>unique rivers and fast flowing streams</u>, traditional upland farms and characteristic beech hedgebanks 	Noted. It has been decided not to make any changes to the special qualities as these are also listed in the newly adopted Local Plan and Landscape Character Assessment and it would be confusing to have different wording for the special qualities in the Partnership Plan.
27.	Exmoor Rivers and Streams Group	bullet point 4 – Amend to read <ul style="list-style-type: none"> • A mosaic of habitats supporting a great diversity of wildlife including herds of wild red deer, <i>nationally important bird populations</i>, <u>important spawning grounds for migratory salmon and trout</u>, rich lichen communities, rare fritillary butterflies, bats, and other species uncommon in southern Britain 	Noted. It has been decided not to make any changes to the special qualities as these are also listed in the newly adopted Local Plan and Landscape Character

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			Assessment and it would be confusing to have different wording for the special qualities in the Partnership Plan.
Ambitions (page 6)			
28.	Devon Wildlife Trust	<p>Tourism Ambition should contain the word ‘sustainable’ Current wording: The tourism economy is vibrant and growing, and celebrates Exmoor’s distinctive character</p>	Noted. The title of this section is ‘Thriving tourism built on sustainability’ and the supporting text 2 nd para clearly references sustainability so not considered necessary to add the word ‘sustainable’ to the Ambition
29.	Exmoor Society	<p>Wildness and Tranquillity Ambition Supplementary comment suggesting rewording of the Ambition to read: ‘The scenic quality and setting of the National Park will be conserved as well as Exmoor being a place where openness, tranquillity, wildness and dark night skies can be enjoyed. Land management, recreation and development will be sensitive to Exmoor’s special qualities.’</p>	Other Ambitions cover conservation of Exmoor’s landscapes, land management and recreation.
30.	RSPB (on behalf of Nature Conservation Advisory Panel sub-group)	<p>Wildlife Ambition The wording should be amended to bring it more in line with the strategy statements on page 22, which are better aligned with the Lawton principles for bigger, better and more joined up habitats. Amend the Ambition to read:</p>	Agreed.

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		Exmoor is richer in wildlife. Habitats are in good condition, <u>expanded, connected and support a greater abundance of species</u>	
31.	RSPB	<p>Working Landscapes Ambition Adding habitats and enhancement into this ambition would make it more encompassing and ambitious. Amend the Ambition to read: <u>'Exmoor's land-based communities and businesses are supported to provide healthy food and good quality timber, and ensure that Exmoor's landscapes and habitats continue to be well managed and cared for and are enhanced where necessary.'</u></p>	<p>The Plan should be read as a whole. The reference to Exmoor's landscapes would encompass all the components that make up landscape character including wildlife and historic environment. Enhancement of these landscapes is covered in the first Ambition under Place.</p>
32.	RSPB (on behalf of Nature Conservation Advisory Panel sub-group)	<p>Moorland Ambition We have some suggested wording for the ambition for the moorland section that we think would allow this to better dovetail with the nature conservation ambition/ strategy and reflect the range of habitats in moorland without the losing the openness and heather aspects of the ambition: Proposal to amend the Ambition to read: <u>'The extent of moorland is increased with the overall levels of openness retained. The habitats within it are enhanced and the area of heather is increased.</u> The loss of heather is halted and reversed'</p>	<p>The wording will be amended to reflect discussion with the Moorland Board, other Strategic Overview Groups and Authority members</p>
33.	RSPB	<p>It is useful to see the plan's structure set out clearly on a single page and to show how sections and themes fit together. (We also welcome the bullet point approach between pages 4 and 9 which helps make the plan be quickly accessible.)</p>	Noted

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34.	RSPB	Reading across the ambitions on page 6, nature conservation appears relatively hidden. It is currently just a single line at the bottom of the 'Place' list and we would like to see it have more profile to better reflect the National Park's first purpose.	The Plan has to be read as a whole and the reason for listing the Ambitions in a table at the front is to show them altogether without giving one prominence over another. National Park purposes are clearly stated on page 11 and form the basis for the Plan.
35.	NFU	We understand why the "people, place and prosperity" have been chosen as they would appear to be zooming from the individual to the community and to the environment and wider economy. i.e. placing the individual in context and with a wider perspective. Perhaps it could be themed as "individuals"; 'communities'; and 'businesses, landscape and environment'? Perhaps explaining some of this might help? We agree with each of the individual ambitions under each theme. They relate well to the vision and the special qualities	Noted. The 'People, Place and Prosperity' themes have been broadly welcomed and it is not considered necessary to change these.
36.	Forum 21	Woodland Ambition. We support the ambition and would like to add the following comments. We recommend measures to promote new broadleaved woodland planting on selected areas within farmland, to improve biodiversity, carbon storage and sequestration and natural beauty, in locations where new woodland would not affect the open nature of Exmoor's moorland landscape. This measure will be a major contribution towards achieving the National Park's vision of becoming a carbon-neutral National Park.	Noted. It is not considered necessary to amend the Ambition, but some wording will be added to the supporting text.

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		<p>We therefore recommend that the woodland ambition should be extended to include new woodland planting.</p> <p>Current wording: Exmoor’s woodlands are diverse, well-managed, productive and enhance the natural beauty, wildlife and cultural heritage of the National Park</p>	
37.	Individual (020)	<p>On overall structure I’d favour putting the pages concerning “Place” first - together with the statutory duties. Revised pages on “People” should follow. I’d suggest the pages headed “Prosperity” need a radical rethink. I have misgivings about the overall structure ie “People, Place, Prosperity”, and its possible implications. I would prefer simply “Place and People”. I’m not an economist, but I think that most of the economists I’ve met would regard as overblown the idea that “Prosperity” or “Thriving Communities” are within the gift of a National Park Authority - or its Partners? These are things that even a national government cannot sensibly promise. In so far the draft is describing an ambition to retain subsidies for farmers then I am content. And it clearly makes good sense to try to encourage skills and good practice, to provide the best possible education and the best public services on Exmoor. On the other hand there may be sacrifices involved in living in a National Park? Exmoor’s National Park boundary was drawn to effectively exclude larger settlements and therefore the nature of Exmoor’s small dispersed rural population effectively means that it is not possible to provide the full range of desired services and facilities within the National Park? These are generally provided at key urban centres surrounding the National Park such as Minehead, Taunton, Tiverton, South Molton, Barnstaple and Ilfracombe.</p>	<p>The Plan has to be read as a whole and the reason for listing the Ambitions in a table at the front is to show them altogether without giving one prominence over another.</p>
38.	Exmoor Rivers and Streams Group	<p>Rivers and Streams Ambition Proposal to amend to read as follows. Exmoor’s rivers, streams and water resources are in good condition, their native fauna and flora thriving, and flood risk reduced.</p>	Accepted.
Purpose of the Partnership Plan (Page 7-8)			

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39.	NFU	This very clearly and eloquently expresses why ENPA must and needs to work in partnership in order for it to prosper. This is perhaps the heart of the plan and might be better placed at the beginning especially as ENPA is looking to move away from having a management plan.	Noted. This will be looked at as part of the final design of the document. The intention is to have the key parts of the Plan including the 'Plan on a Page' at the front of the document to catch people's attention
40.	NFU	The only comment is on figure 1. We would add in that monitoring should be able to feedback into the delivery programme and actions so that activities can be constantly improved and refined.	Agreed
41.	Exmoor Rivers and Streams Group	<p>'Who is it for?' bullet point 2 – Proposal Amend final sentence to read:</p> <ul style="list-style-type: none"> • It's for our partners. The Plan can only be achieved if we work together to deliver it. This involves <u>land and property owners and a wide range of partners who all have an important role to play</u> 	Noted. It may be better to add a separate bullet point relating to land and property owners (see comment no.56)
Exmoor National Park: Our story (page 10)			
42.	RSPB	Exmoor's Highlights. We suggest this title is 'Some of Exmoor's highlights'. It is an interesting set of facts but is not all of Exmoor's highlights.	Agreed
43.	Exmoor Rivers and Streams Group	<p>P.10 paragraph 3 Proposal to amend final sentence to read: At just 693 square kilometres, the National Park is one of the UK's smallest. But what it lacks in size it more than makes up for in beauty and variety thanks to spectacular coastline, expansive moorland, steep wooded valleys <u>with fast flowing rivers and streams</u> and rolling farmland.</p>	Agreed

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44.	Exmoor Rivers and Streams Group	<p>Amend 4th paragraph to read: The value of Exmoor is not only aesthetic. From a conservation point of view, the moorlands and oak woodlands are designated internationally for the habitats and species they support <u>and our rivers provide important spawning grounds for migratory game fish.</u> And our archaeological and cultural heritage is remarkable: new sites and discoveries are frequent in the National Park, and we enjoy a rich tradition of local art, literature, music and food.</p>	<p>This section is an overview of the National Park and its important habitats and species. It would not be right to highlight one species here and not others. The importance of rivers for migratory fish is recognised in later sections.</p>
45.	Exmoor Rivers and Streams Group	<p>Exmoor's highlights Insert a new bullet point <u>Wild rivers</u></p>	<p>Not needed. This is only intended to provide a flavour of some of Exmoor's highlights and rivers and streams are well covered in other parts of the Plan</p>
National Park designation and statutory purposes (page 11)			
46.	Individual (020)	<p>The draft Partnership Plan anticipates that the primary statutory conservation purpose of the National Park can be reconciled with: (i) the encouragement of commercial activities “by enabling businesses to make the most of the unique opportunities that being located in the National Park provides”, and; (ii) increased visitor numbers, large events and outdoor recreational facilities, and; (iii) seeking to foster the economic and social well-being of local</p>	<p>Noted. The National Park has two statutory purposes and the Sandford principle applies where there is conflict between these that cannot be</p>

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		<p>communities with promises of “Prosperity” and “Thriving Communities”. I’m not convinced that these ambitions are achievable without Exmoor – and its settlements - becoming diminished assets. My fear is that Exmoor will be overexploited. The Government has adopted an objective of being the first generation to leave the natural environment of England in a better state than that in which we found it. Whether over five years, or longer, I’d suggest that the draft plan risks leaving Exmoor’s natural environment in a worse state than at present.</p> <p>The National Park Authority’s strategic plan cannot be all things to all people. This would lead to an incremental failure, over time, to achieve the National Park’s primary objective, with a loss of important special qualities such as wilderness and tranquillity and a loss of the distinctive qualities of its settlements.</p> <p>We might be at a tipping point when the purposes of National Parks may need to be rethought. An asset based approach as advocated by Professor Helm seems to offer many advantages. Many questionable initiatives are currently justified on the grounds that they “help the local economy” - but with no countervailing balance sheet adjustment for the fact that Exmoor’s traditional tranquillity, beauty and wildness might be diminished?</p> <p>As it stands I see the draft report giving too much weight to two particular pressures. Firstly, the voices of commerce eager to earn money from the special qualities of the National Park. Commerce is an essential part of our economy – but pushed too far in a special area like a national park it can become destructive. And secondly the totally understandable wish to achieve social and economic objectives. The danger is that the outcome will be incompatible with the National Park’s primary statutory function. Decisions will continue to be made on quite narrowly drawn arguments about the need for development without properly taking into account the costs.</p>	<p>reconciled, as set out on page 11.</p>

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47.	Individual (020)	This statement of the statutory purposes is clearly vital and could be set out earlier in the Plan? It could also be made clearer by using the wording by the government inspector in his comments on the Local Plan that “it is important to note that the statutory duty to seek to foster the economic and social well-being of local communities within the National Park is to be met in pursuing the National Park purposes not independently of them”?	Noted. This will be looked at as part of the final design of the document. The intention is to have the key parts of the Plan including the ‘Plan on a Page’ at the front of the document to catch people’s attention. The Plan needs to be read as a whole.
48.	Exmoor Society	There will be constraints on people living, working and enjoying Exmoor because of the national park status and the national and international vision for these finest UK landscapes. It is not always possible either to reconcile different interests or to find lasting solutions to deep seated intractable problems. Although attempting reconciliation is the right approach to start with, there needs to be an awareness that difficult decisions have to be taken. For example, conflicts between different users of the Park need to be recognised and addressed e.g. ‘an active playground’ <i>versus</i> ‘tranquillity’. The Authority cannot be all things to all people especially when crucial decisions such as moorland land management regimes and socio-economic services are made by other public bodies. Exmoor’s boundaries were drawn very tightly to exclude larger settlements which today provide many of the services and facilities for the area and are the responsibility of the four respective Local Authorities.	Noted. The National Park has two statutory purposes and the Sandford principle applies where there is conflict between these that cannot be reconciled, as set out on page 11.
Changing landscapes: the challenges and opportunities facing Exmoor (page 12)			
49.	RSPB	Incremental and cumulative change (last para): We would like to see a broadening of the wording to the first sentence to include other pressures	Noted. This will be covered by changes to the text under the

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		on heather such as heather beetle and nitrogen deposition, as well as the pressures from native vegetation, which is itself of intrinsic value for wildlife.	Moorland Ambition (see comment 101)
50.	Greater Exmoor Shoots Association	<p>As to the public opinion survey and the comments reported on pages 13 & 14, we raised objection at the time on grounds of fairness which the questionnaire did not properly balance. It was biased.</p> <p>Some remarks identified changes (“incremental and cumulative” your Draft calls them) - and suggests game cover crops as an example. Such crops are good for wild life and many farmland birds are given significant advantages by these crops over winter and long after January, when the shooting season has ended. We know that keeping and game cover crops increase the number of birds and the species on participating farms both near woodlands used for pheasants, and also at a distance from the woodland edge.</p> <p>While it is clear that any change elicits adverse comment from the public, the plots of crops grown as part of the world-leading shooting success story on Exmoor are in many cases the same fields as the arable crops that were grown in a more self-sufficient farming system which created the pastoral landscapes of 50 or 60 years ago. This can be seen from the Second Land Utilisation Survey maps from the mid-1960s when every field was recorded with its crops at that time. Game cover crops replicate those patterns and also supply important diversity lost with the modernisation of farming when artificial fertilizers and mechanised silage systems were introduced.</p> <p>Although some changes that have previously been regretted by public comment continue to occur (for example, plastic bale wrapping) where we can mitigate impacts shoots are generally willing to adopt other strategies for minimising the effect of temporary or permanent features. Good communication between the National Park and shoots is a key to meeting the small but cumulative effects of these.</p>	<p>The public opinion survey was balanced in asking three questions relating to game shoots, covering a range of perspectives from the levels of shooting being about right, increasing levels of shooting to support the local economy, or greater controls over shooting to minimise negative impacts. The comments reported on pages 13-14 do not just refer to the public opinion survey but other concerns that have been raised by the public and through consultation. The value of game cover crops for wildlife is accepted, although there can be some impact on landscape</p>

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			character where these are located adjacent to the open moors. The wording of this section will be adjusted to refer more generally to the cumulative effects of shoots.
51.	NFU	We would perhaps add in a sentence at the beginning saying <i>“this plan is written in the year after Brexit and so much of the policy and regulatory framework for the future is still unknown at this time. This is a 5 year plan ...”</i>	Agreed
52.	NFU	It might also be useful to make some mention on demographics (the need for farming succession and the age of the population) as well as the skills and experience that need to be retained on the hills but could be lost through changes in farming, policy and funding. The skills part also relates to the challenge for helping farmers diversify their incomes or increase their farming income. Many will need support to do this.	Agreed. This will be picked up under the Working landscapes section
53.	NFU	Marketers and business analysts will often break issues into two areas “megatrends and disrupters”. The megatrends would look at issues including: economics and changing food habits and ability to take holidays; demographics which would include who visits, who lives and works in Exmoor; climate change. Disrupters would include: storms and droughts; livestock pests and diseases; devolution and localism. It might also help to do this section via PESTLE analysis? Otherwise we would support the challenges and opportunities as listed.	This section is based on the challenges and opportunities identified through the State of the Park Report and Landscape Character Assessment, and so is structured to be consistent with them.
54.	Individual (020)	Although already fairly lengthy I don’t think this section yet adequately describes the challenges. A full and accurate assessment is clearly critical.	This section is based on the challenges and opportunities identified

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		<p>Other forces for change are described in the Exmoor Landscape Character Assessment e.g.</p> <ul style="list-style-type: none"> - traffic impacting on perceptions of tranquillity, remoteness and wildness; - concentrations of visitor facilities potentially changing the character of the landscape to one dominated by recreation; - to manage valley-side areas which were formerly grazed but are now being encroached upon by scrub and bracken, or open to development. <p>In particular, while the Landscape Assessment is a valuable piece of work in many ways, I didn't come away with a clear view of the big picture? Nor do I from this draft. Neither adequately describes the forces for change acting on the settlements?</p>	<p>through the State of the Park Report and Landscape Character Assessment, and so is structured to be consistent with them. Further information on the issues highlighted are included in these more detailed documents.</p>
55.	Exmoor Society	<p>The State of the Park Report 2017 provides the key facts and figures to understand trends and issues that can be fed into the plan. Sometimes the evidence for the eight special qualities is insufficient. Examples include no up to date Section 3 Map, landscape quality of the different moorland blocks or overall loss to woodland (see three reports 2004 <i>Moorland at the Crossroads</i>, c.2012 <i>The NT Veteran Tree Report</i>, 2016 <i>Exmoor's Moorland Where Next?</i>) and no reference to the recommendations in 2013 report <i>Exmoor's Woodland Potential</i>. The Society is concerned with the structure, standard, limitations and inconsistencies of the Public Opinion Survey that was used to identify public preferences and concerns.</p>	<p>A full State of the Park Report is being produced to accompany the new Partnership Plan. The Public Opinion Survey was based on a previous survey carried out 10 years ago in order to identify if there are any significant changes in public opinion. It formed one of the information sources for the Plan along with the State of the Park Report and discussions with the</p>

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			Strategic Overview Groups
56.	Individual (029)	<p>It is noticeable that you do not mention the creation of additional employment opportunities under 'development led change'. Elsewhere you comment on the declining and ageing population. Your apparent lack of ambition to provide new employment opportunities particularly for young people will surely lead to an even greater decline in the population and an increasing average age.</p> <p>Unless employment opportunities are created, driven by a change in your planning policies regarding where new businesses can be created why would our younger people stay within the park. If the only employment opportunities for them lie outside the park they will surely move to the areas where employment can be found.</p>	<p>The plan should be read as a whole. Under the Prosperity section there are clear ambitions around a strong local economy including rural pathways to employment, sustainable (business) growth and increasing productivity.</p>
PEOPLE (page 14)			
57.	Exmoor Rivers and Streams Group	<p>Add new 2nd paragraph as follows. <u>Most of the National Park is privately owned and managed and its special qualities are largely maintained and enhanced by these efforts. The support and co-operation of Exmoor's land and property owners is therefore essential to the delivery of the plan.</u> (Note - This respects the contribution of owners whose role is otherwise omitted.)</p> <p>Supplementary comment to propose the wording on p12 to read 'We have a simple ambition for Exmoor National Park: that everyone <u>nurtures and enjoys it, whether private owner of land or other property</u>, resident, or visitor, and benefits from its special qualities.'</p>	<p>Noted. This might fit better on page 7 under 'Purpose of the Partnership Plan' (see Comment no. 40)</p> <p>Noted. The reference to 'private owner of land or other property' would be covered by 'resident'.</p>
PEOPLE. The Exmoor Experience (page 15)			

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58.	Sport England	<p>The Partnership Plan’s ambition that <i>‘More people enjoy Exmoor, are inspired, get involved and learn about its special qualities’</i> fits well with Sport England’s own outcomes.</p> <p>In 2015 we commissioned the Outdoor Industries Association to investigate how well the ‘supply’ of outdoor recreation activities matched market demand – and what steps might be taken to enable more people to benefit from being active outdoors. The report identified a number of actions the sector might take to meet the needs of people who are currently less likely to access outdoor recreation. The report can be accessed here: https://www.sportengland.org/research/understanding-audiences/getting-active-outdoors/ and can provide useful insight for Exmoor National Park Authority in taking forward its Partnership Plan.</p> <p>A Planning Perspective - Sport and National Parks</p> <p>National Parks are an important resource for sport, and provide opportunities for millions of people each year to participate in their chosen activity.</p> <p><i>We seek to maintain and improve opportunities for sport in the National Parks and to ensure that existing and new activities are managed and developed in a way which meets the purposes of National Park designation and sustainable development objectives.</i></p> <p>Sport England will promote policies and practices that:</p> <ul style="list-style-type: none"> • seek to maintain and improve opportunities for outdoor sport in National Parks; • promote the use of good management practices to balance the legitimate needs of sport with other interests; • do not seek to impose a blanket ban on certain sporting activities within National Parks; • take account of the sporting needs of the resident community within National Parks; and 	<p>Noted. Our proposals will actively support a wide variety of outdoor sport including running, horse riding and off-road cycling as well as water sports including canoeing and kayaking and we recognise the huge role outdoor sport can play within our sustainable tourism sector. We recognise that carefully designed infrastructure has an important role to play along with public information and outreach activities to help all kinds of people enjoy our National Park. Our policies and guidance welcome and support well managed sport events within the National Park and will continue</p>

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		<ul style="list-style-type: none"> • seek to identify sites for possible counter attractions which may relieve the pressure on the most sensitive areas. <p>National Parks provide some of the finest natural resources for sport. By far the greatest number of visits to National Parks are made by walkers, but the Parks are also an important specialist resource for sports such as climbing, caving and water sports, where the resource can be of national significance.</p> <p>Sport and Green Infrastructure (GI)</p> <p>It is clear that outdoor sport already takes place in areas that could be considered part of the existing green infrastructure network, river and green corridors provide space for sports such canoeing, sailing and horse riding events, and wider open space in the countryside plays host to climbing, all types of cycling events among many others.</p> <p>Sport and the Natural Environment</p> <p>Every year hundreds, if not thousands, of such sporting events take place that rely upon the natural environment. A lot are the transient, peripatetic sporting events that the organising club sets up, the competition takes place, and afterwards any equipment (e.g. signage, fences, ropes, show jumps) are dismantled and the land reverts to its original use. These events can include equestrian activities, motorsport, cycling, running, canoeing and climbing events.</p> <p>What all these sporting activities tend to have in common is a control point where participants assemble, register for the event, and it acts as the start/finish point for the competition; sometimes village halls can support this. Such activities may have some purpose built ancillary facilities, such as a floating pontoon, clubhouse, bunkhouses, changing rooms and storage units. Although not always essential this supporting infrastructure can be crucial to enable a good level of competition.</p> <p>Because of the transient nature of these types of events, they tend to operate outside the planning system and rely on the provisions of Class B,</p>	<p>to do so into the future.</p>

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		<p>Part 4 of the Town and Country Planning (General Permitted Development) Order 1995. Part 4 allows for the temporary change of use of land for either 14 or 28 days a year. Because of this, many local authorities do not even know that the events are taking place in their area. Occasionally some events do require planning permission and this tends to be where permitted development rights do not apply, or that the events have taken place more than 14 or 28 days per year and therefore exceed their permitted development rights.</p> <p>These events tend to use a range of different landscapes such as forests, waterways, moorland, old quarries, natural features such as rock faces and agricultural fields. Whilst some rely on using the rights of way network, other might use permissive routes such as private moorland tracks with the land owner's consent. Horse riding and mountain biking do also rely on manmade and more permanent cross county courses, which can sometimes require planning consent depending on scale and engineering work required.</p> <p>Sport on manmade routes and more peripatetic activities do happen in areas with landscape protection designations. The Scott Trial (see case study), for example, takes places in part on a Site of Special Scientific Interest, with the consent of the local planning authority and Natural England. Many rock faces are also designated SSSIs but still accommodate climbing competitions through a managed access protocol. Therefore landscape protection does not necessarily rule out a sporting event taking place.</p>	
PEOPLE. Well managed recreation and access (page 16)			
59.	South West Coast Path Association	We welcome the ambition “ paths, open access and recreational facilities are enhanced to offer more and better experiences for people who want to explore and enjoy the National Park” on page 16 of the draft plan. We also welcome the recognition, on the same page, that “rights of way network includes wild and rugged paths for adventurous exploration and accessible	Noted

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		paths for quiet enjoyment". This page also recognises the iconic nature of the Coast Path, which is considered to be one of the world's greatest walks	
60.	Individual	What control do you have over cycling and other forms of "aggressive recreation" over moorland in the National Park?	We have a variety of tools and powers to help management of any damaging activities on our moorland. Adventurous outdoor recreation has long history in our National Parks though new equipment brings changes that need to be carefully considered.
61.	Individual (020)	<p>Sir Roy Strong complained recently that the National Trust was being turned into a branch of the leisure industry. Perhaps National Parks are too? Promoting access, walkers and visitors have long been central planks of Government policy towards National Parks. More recently outdoor recreation has also become a priority. Here's an extract from the Government's National Parks Plan 2016:</p> <p><i>"....realise the immense potential for outdoor recreation in National Parks. In 2015, the Government published its new strategy on sport and physical activity, Sporting Future: A New Strategy for an Active Nation. The strategy recognises the importance of ensuring that people have the opportunity to get active outdoors as well as the need to support initiatives that encourage this kind of activity and the infrastructure to facilitate it".</i></p> <p>Exmoor does indeed enjoy an exceptional rights of way network, with historic routes that are often rugged and narrow in character, along with</p>	We do not consider it wise to delete the references to 'new & enhanced routes or other recreational facilities'. The access network does need to change and adapt to meet the modern needs of the public though of course we recognise that any proposed changes need to be carefully

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		<p>extensive areas of open country and permitted access, providing opportunities for walking, riding and cycling. By continually improving these beyond a certain point however - and seeking to widen the use of - footpaths we risk threatening both Exmoor's historical legacy and qualities such as tranquillity? Upgrading footpaths to bridleways can have an undesirable impact on the amenities of local residents, and other visitors here to enjoy the quiet enjoyment of the National Park.</p> <p>I'd suggest deleting the undertakings in the draft to provide "new and enhanced routes" and to create "other recreational facilities".</p>	<p>considered and consulted upon.</p>
62.	Individual (020)	<p>I'd suggest instead the following:</p> <ul style="list-style-type: none"> - a review by the ENPA of procedures for agreeing and handling sporting and fund raising events and facilities within the National Park? Are existing powers of the ENPA, and/or town and parish councils, sufficient? - attach adequate weight to Exmoor's tranquillity and wildness in the Partnership Plan? eg the inclusion of the objective contained in an earlier plan: "to ensure recreational activities are compatible with the principle of quiet enjoyment and the activities of persons living and working in the National Park"? - events should be held in the National Park only when the National Park is appropriate. Encourage activities which respect the special nature of Exmoor's landscape and wildlife, and resist those which do not need to take place within the National Park? eg promote tourists who are interested more in the wildlife and cultural heritage of Exmoor rather than seeing it is a playground for outdoor activities. - Appeal to Companies, Charities and Fundraisers for self restraint? The Institute of Fundraising's guidance used to suggest that careful thought be given to organising large scale funding events in alternative, less sensitive areas. The new Fundraising Regulator's Code of Fundraising Practice however seems rather less helpful: 	<p>Our procedures for monitoring, managing and supporting outdoor recreational events have recently been reviewed and we will continue to keep these under review as necessary. Our evidence regarding the impact of outdoor recreational events does not back up a need review our procedures again at this point in time or pursue further powers however we will continue to monitor this issue.</p>

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		<p>https:// www.fundraisingregulator.org.uk/15-0-events/.</p> <p>- Mountain bike events are encouraging landowners to make available additional, temporary camping facilities under the 28 day loophole. Urge Central Government to end the loophole.</p>	<p>Outdoor recreational events are recognised as an important way for many people to enjoy the special qualities of the National Park and can also bring valuable income for local business and charities.</p>
63.	Individual (027)	<p>There needs to be a reference to the fact that if many footpaths and access routes are (in effect) sanitised for easier access, then they will lose the very 'ruggedness' that the Partnership Plan states is a key feature of Exmoor. The sanitising and upgrading of footpaths etc must be done in a limited and considered way that reflects the desires of visitors to see a 'rugged' countryside rather than a flat walking surface which can be found in other parts of the country. The wishes of the many should not in all cases be taken in precedence to the needs of the few. ALL people need to be considered.</p> <p>Possible actions could include:</p> <ul style="list-style-type: none"> • Restriction on increased paths and access routes. • Good signage so that there is less possibility that people will 'stray' from the current paths. • Constant surveillance and upgrading of current 'furniture' around Exmoor which people rely on for map reading purposes. • VERY IMPORTANTLY Better policing of, and penalties given, to all irresponsible hunters! (Was it a Treasure Hunt I witnessed whilst at Tarr Steps during the last weekend in August when my husband was nearly run down by a landrover driver?) This during a frenzied cavalcade of 	<p>We support the points you make here and will ensure this is incorporated into any action plans that are developed.</p> <p>The incident you refer to at Tarr Steps was a group of people following the Devon and Somerset Stag Hounds. With support from the police we have and will continue to work with our local hunts to help ensure that issues of ground damage, tranquillity and local highway</p>

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		about 40 4 x 4 wheel trucks that crashed through the river nearly killing dogs and running down children! There was a police vehicle among this group that did absolutely nothing! Apart from raise his eyebrows at the frightened onlookers whilst keeping his place in the cavalcade.	disruption are minimised.
PLACE. Thriving Tourism built on sustainability (page 17)			
64.	South West Coast Path Association	We also welcome the recognition on page 17 of the importance of sustainable tourism to the local economy,	Noted
65.	NFU	CareMoor and the Exmoor Brand appear to be a very key part of the ENPA and could perhaps be brought out more and linked to the partnership aspect of the plan	These are included as Strategy bullet points
66.	Individual (020)	<p>As numbers of visitors and recreational and fund raising events increase, so does the possible negative impact on the National Park Authority's current primary statutory purpose - the conservation and enhancement of the natural beauty, wildlife and cultural heritage of Exmoor National Park. The life of residents can also be made less pleasant, and the fabric and everyday life of historic settlements can change for the worse? Maybe the tide of History is turning with complaints growing around the world about the adverse impacts of tourism? https://www.cntraveler.com/.../barcelona-bhutan-places-that-l... The draft promises broad encouragement of commercial activities "enabling businesses to make the most of the unique opportunities that being located in the National Park provides". The theory of the Tragedy of the Commons on the other hand would see this as another way in which Exmoor's Special Qualities could be overexploited. If overexploitation is to be avoided then measures must be in place to determine who can and cannot access the public good. It requires an active management decision to exclude a variety of economic activities that would otherwise over exploit the resource? Who should be able to use the special qualities of the National Park to generate income? Such a</p>	<p>The strategies drafted to deliver the tourism Ambition make a clear and strong reference to the philosophy of celebrating our distinctive character and in particular to caring for Exmoor with businesses and visitors contributing to keeping Exmoor special, helping to conserve Exmoor's special qualities.</p> <p>Underpinning the prosperity Ambition are strategies around</p>

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		<p>question is not a comfortable one. Not least it runs counter to ideas of economic efficiency, to the doctrine of free trade, and might produce problems for trade agreements. But National Parks are protected areas. As far as existing businesses on Exmoor are concerned there is an understandable wish to increase visitor numbers and to extend business activity around the year. The biggest problem is perhaps that of scale? What is tolerable for the special qualities of Exmoor - and its residents - on a small scale can be intolerable on a big scale. The 'polluters pays' principle holds that those who produce pollution of one sort or another should bear the costs of managing it? Perhaps we should encourage only commercial activities which respect the special nature of Exmoor's landscape and wildlife, and resist those which do not need to take place within the National Park eg promote tourists who are interested more in the wildlife and cultural heritage?</p>	<p>sustainable growth (i.e. encouraging only increased business development which is compatible with Exmoor's special qualities. Much of this is dealt with through the planning process and the newly adopted Local Plan that sits alongside this Partnership Plan for planning policies.</p>
67.	028 Lynton & Barnstaple Railway	We fully support the promotion of a thriving Tourism sector which can bring prosperity to the park residents	Noted
68.	West Somerset Council	<p>The Plan reads really nicely and sustainable tourism is at its heart, along with local distinctiveness, while protecting the environment on which it all depends. Just two things which you may consider (although I don't know whether they are necessarily appropriate in the context that you work within).</p> <p>1) Where it mentions about using the Exmoor brand to promote the National Park. Should this not allude to working with partners to use the Exmoor brand to promote the Greater Exmoor area – a reference to the fact that marketing of the area is more effectively done in partnership and that the National Park needs involvement from businesses outside the park boundary in order to get its messages across and successfully achieve its ambitions. Watchet and South Molton visitors are Exmoor visitors etc.</p>	Noted. This will be picked up through the Delivery Programme

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		2) Hinkley could be a potential challenge across the lifetime of the plan in terms of traffic movements, the experience and migration of less well paid seasonal jobs to better paid ones at HPC. So maybe there is something about again working with partners to limit challenges and maximise opportunities from the development to ensure the National Park prospers and thrives.	
PLACE. Celebrated Landscapes (page 19)			
69.	Devon Wildlife Trust	The Ambition and Strategy should capture how this is still a changing landscape and how we should continue adapting while protecting important and special features	Agreed. Wording to be moved to this section from p20 'Exmoor's magnificent landscapes have changed over time and will continue to change.
70.	South West Coast Path Association	We welcome the ambition to conserve the character and celebrate the beauty of the Park, on page 19	Noted
71.	Exmoor Rivers and Streams Group	Amend paragraph 1 to read Exmoor is remarkable, even among other National Parks, for the very diversity of its landscapes. It is justly famous not only for windswept, open, heather moors, but also dramatic high coastal cliffs, seascapes, intimate wooded valleys and rivers and attractive enclosed farmland.	Agreed.
72.	Individual (031)	The landscape and its character needs to be able to change and should not be fixed	Agreed. Wording to be moved to this section from p20 'Exmoor's magnificent landscapes have changed over time

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			and will continue to change.
PLACE. Wilderness and tranquillity (page 20)			
73.	Devon Wildlife Trust	Decide whether wilderness or wildness	Noted. The title will be corrected to 'wildness'
74.	Individual	<p>Priorities for Exmoor National Park Plan need to include maintaining:</p> <ul style="list-style-type: none"> • wilderness, • tranquillity, and • difference. <p>MAINTAINING DIFFERENCE</p> <p>Anything that bureaucratises Exmoor should be tested for its effect, and potentially unintended consequences, on wilderness and tranquillity, before being permitted. A place which is different from the elsewhere in the country is a national breathing space for all.</p> <p>Exmoor and the Park must acquire the powers to minimise interventions and regulation which imitate suburban countryside eg commercial and other hoardings on the Moor; 1 mile of road currently home to 22 Highways signs.</p> <p>All signs, especially road signs, need to be subject to planning, not the sole responsibility of external agencies which are not necessarily stakeholders in maintaining Exmoor's difference.</p> <p>Major events on the Moor have a saturation point and need a limit. Focus most of these around the periphery not the centre. Avoid manicured footpaths.</p>	<p>Noted. The Ambitions include maintaining Exmoor's wildness and tranquillity, and the Plan highlights what makes Exmoor special and different. The newly adopted Local Plan provides the planning policies for control of development such as signage, although not all signs require planning permission. Concerns over large scale events are noted, please see response to comment 62.</p>
PLACE. Valued historic environment and cultural heritage (page 21)			
75.	Lynton & Barnstaple Railway	The valued historic environment (Page 21) can be enhanced by restoration project such as the Lynton & Barnstaple Railway	Noted

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76.	Individual (031)	Not sure who the "our" is. It seems an exclusive rather than inclusive term.	Agreed. This will be changed to 'Exmoor's'
PLACE. Rich in Wildlife (page 22)			
77.	RSPB	As suggested above, we would like to see the ambition for 'Rich in Wildlife' reworded as above, and renamed ' Richer in Wildlife ', and for this section to be moved up, perhaps to sit under Celebrated Landscapes.	The Plan has to be read as a whole and the reason for listing the Ambitions in a table at the front is to show them altogether without giving one prominence over another.
78.	RSPB	In paragraph 2, suggest tweaking this wording to ' A wide variety of birds can also be seen in Exmoor, both common and <u>rarer</u> species..... and seabirds along Exmoor's coast '.	Noted and agreed.
79.	RSPB	Paragraph 3. The second sentence mixes the relative unknowns of climate change with the more tangible affects of land management. Proposal to reword as follows: 'But Changes in climate and land management favour some <u>habitats and species</u> over others, leading inevitably to 'winners and losers' and climate change is adding to the challenges faced by many species.'	Noted and agreed.
80.	RSPB	Delivery of the wildlife ambitions are intrinsically linked to other themes in the plan, primarily relating to land management but also recreation and potentially other uses of the National Park. Integration of the wildlife ambition and actions with other overview groups will be vital for it to be successful.	Noted and agreed.
81.	Somerset Wildlife Trust	It is, as always, very well put together.	Noted.

No.	Respondent	Comment	Response & recommended action
		As a trust the main issues we are looking to see in such a plan is the encouragement of biodiversity, ecological networks, green infrastructure and nature/wellbeing elements all of which I found in the plan.	
82.	Brompton Regis Parish Council	It was noted that (page 22) kestrels are observed in various parts of the national park and it is to be hoped that the population of these and other species may be increased through careful land management.	Noted.
83.	Devon Wildlife Trust	Strategy Point 1: requires the word 'connected' and change the word 'improved' to 'enhanced' due to agricultural improvement connotations and potential misunderstanding Proposal to reword as follows: Conserve and enhance wildlife: Exmoor's rich mosaic of wildlife habitats and their associated diversity of species are maintained, improved, <u>connected</u>, <u>enhanced</u>, expanded, and therefore made more resilient	Agreed. Amend to read Conserve and enhance wildlife: Exmoor's rich mosaic of wildlife habitats and their associated diversity of species are maintained, improved, <u>enhanced</u>, expanded, and therefore made more <u>connected and resilient</u>
84.	Exmoor Rivers and Streams group	paragraph 2 – Amend last sentence to read The beautiful rivers that rise on Exmoor are important and sensitive habitats that support a wide range of wildlife <u>including the internationally vulnerable Atlantic salmon</u>	Noted and agreed
85.	West Somerset Council	Invasive species ; The EA plus partners has rolled out Plant Tracker; http://www.plantracker.org.uk/ as their preferred vehicle to report invasive species in UK. Your plan makes no reference to this important tool to ensure site locations are in the public domain.	Noted. This will be considered by the Nature Conservation Advisory Panel in relation to the Delivery Programme

No.	Respondent	Comment	Response & recommended action
PROSPERITY (page 23)			
86.	Lynton & Barnstaple Railway	Encouraging productivity and routes to employment especially for young people can be achieved by providing apprentice opportunities in trades/skills that are transferable to the general local economy.	Agreed and this will form part of the action plans developed to guide delivery of the strategic ambitions currently set out.
87.	Individual (029)	<p>Again, no clear strategy is demonstrated to create jobs. I fear ENP is wanting to just rely on tourism and farming to take care of all the employment issues. The number of younger people who move away should make you realise this is a flawed strategy.</p> <p>Relax your planning rules, incentivise employers to set up businesses here which employ reasonable numbers of people and this will encourage young people to stay, help reverse the ageing problem and make schools more viable.</p> <p>It is all very well focussing on craft units and similar where individuals can work but without conventional employment you will not change what is happening with the younger generation.</p>	<p>Please see response to no.66.</p> <p>The strategy refers to farming and tourism, as these are dominant in our economy. However there is also reference to supporting other businesses, in particular micro businesses within the area with capacity to be grown sustainably. The strategy also has a focus on rural pathways to employment with a particular focus on young people. Planning policies are beyond the scope of this document and are</p>

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			dealt with in the newly adopted Local Plan for Exmoor, which sits in parallel to the Partnership Plan.
PROSPERITY. Working landscapes (page 24)			
88.	RSPB	<p>Strategy. The first five points contribute to the National Park’s special qualities and are linked in some way in delivering these, in particular through appropriate livestock grazing using traditional breeds, and the related support and markets. The link is less clear though for the final point relating to shoots.</p> <p>The last three strategy statements imply maintaining the status quo, rather than setting a direction of travel, or giving some indication that maintaining the current situation is a challenge and therefore part of the ambition. It would be good to draw this out so it is clearer.</p>	Noted. The Strategy bullet points respond to the challenges set out in the State of the Park report and summarised in the Changing Landscapes section section.
89.	Greater Exmoor Shoots Association	<p>I note the comments at page 25 “Game Shoots: game shooting continues to provide a balanced contribution to Exmoor’s special qualities and local economy”.</p> <p>I may be able to add further information on the estimated turnover of shooting (for profit and not intended for profit, being approximately equal in the activities).</p> <p>A large proportion of the money spent on Exmoor game shoots goes to the land managers (farmers and foresters) who are actually in control of the land within the National Park and whose land it is that has been designated for its special qualities.</p>	Noted. Further information from GESA would be welcomed.
90.	Devon Wildlife Trust	Strategy Point 1: supporting the future of hill farming and forestry should add ‘where this supports and enhances landscape, wildlife and heritage features’	This is included in the Ambition wording and does not need to be repeated. The Plan

No.	Respondent	Comment	Response & recommended action
		Current wording : Prepare for the future: collaborative working that influences future agricultural, forestry and environmental policy and funding to support the future of hill farming and forestry on Exmoor	should be read as a whole.
91.	Devon Wildlife Trust	Strategy Point 3: add 'where sustainable' to this Current wording: Grown on Exmoor: the market for local produce such as healthy food and good-quality timber continues to grow	Not needed.
92.	Devon Wildlife Trust	Strategy Point 6: add 'where this is demonstrably not detrimental to landscape, wildlife and heritage features' Current wording: Game shoots: game shooting continues to provide a balanced contribution to Exmoor's special qualities and local economy	This is included in the wording of the Strategy with reference to the 'balanced contribution to Exmoor's special qualities'.
93.	NFU	The environmental, landscape and human capital of natural parks is the result of millennia of livestock farming. Livestock farming is critical to the future of ENP and needs to be fully recognised as such within the plan. We know that ENPA has a strong relationship with the farmers across Exmoor and this is shown from the high engagement in ENPA and also the Exmoor Hill Farm Network that the NFU supports	Noted and agreed.
94.	NFU	There should be some mention of the need to integrate the farming aspects within the wider landscape deliver and natural capital aspects. We agree with the need to be innovative. This should include having a more outcomes focus on delivery and enabling the farmers to shape the schemes.	Noted. The link between farming and landscape is stated in the first paragraph. There is a clear commitment in the first bullet point to a collaborative approach to influencing future policy and funding

No.	Respondent	Comment	Response & recommended action
95.	FWAG SW	There's quite a strong emphasis on the impact of policy which is obviously a big driver with a lot of unknowns. Is there merit including reference to other drivers within the sector from cash flow due to narrow margins and fluctuations in input costs and market value of beef and sheep. Also changing demographics and supporting young farmers and new entrants. These are good drivers to support the strategy described in that section	Agreed. Add supporting text
PROSPERITY. Strong local economy (page 25)			
96.	Individual (020)	<p>my scepticism of how much of this within the gift of a National Park Authority - or its Partners. It does however clearly make good sense to try to encourage skills and good practice, to provide the best possible education and the best public services on Exmoor.</p> <p>I find the references to "capacity increases" disconcerting - even though there are welcome caveats about being consistent with National Park purposes. I am also sceptical about the sorts of option trailed by from the Heart of the South West:</p> <p><i>"South West LEPs should explore and develop the concept of 'environmental enterprise zones' that put an area's natural and cultural assets at the heart of economic development, creating opportunities for small and micro-businesses to capitalise on these distinctive assets."</i></p> <p>The wording in the draft again promises broad encouragement of commercial activities enabling businesses to make the most of the unique opportunities that being located in the National Park provides. And I'd again repeat my warning that the theory of the Tragedy of the Commons on the other hand would see this as another way in which Exmoor's Special Qualities could be overexploited.</p> <p>There is a general question about whether commercial interests represent a threat or a benefit in National Parks?</p> <p>We applaud many who earn money from National Parks. Farmers have largely created the landscape that many enjoy. Foresters manage trees which many appreciate. Businesses in settlements have provided them with</p>	Please see response to no. 66. Whilst the 'powers' of the National Park Authority are largely limited to planning, the Plan sets out Ambitions and acts as a tool to work with other partners to inform and influence. It is noted that the references to increasing capacity can be misleading and the wording is being reviewed. In this instance, we are looking at long-term resilience and strength of the sectors and not focusing solely on numerical growth.

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		<p>supplies. Each has also contributed in an important way to the National Park. Can a distinction be made with companies and charities who use National Parks to generate income but who bring with them costs and problems rather than making a contribution? Perhaps we should encourage only commercial activities which respect the special nature of Exmoor's landscape and wildlife, and resist those which do not need to take place within the National Park? eg promote tourists who are interested more in the wildlife and cultural heritage of Exmoor rather than seeing it is a playground for outdoor activities? The former might also produce a higher level of income for local businesses with a smaller footprint in terms of numbers of people? Encouraging rural businesses to generate profit through the delivery of environmental benefits might be a further approach? Finally, it seems likely - and desirable - that Exmoor's farmers after Brexit will receive agri-environment payments for production of "public goods". What would this mean if, for example, it became clear that the same farmers were at the same time having an adverse impact on the environment by diversifying into other business and recreational activities?</p>	<p>CareMoor for Exmoor provides an opportunity to work with those that benefit from the moors to contribute to conservation initiatives.</p> <p>A series of work is proposed under Place to explore the future opportunities around agri environmental schemes as a result of Brexit.</p>
PROSPERITY. Thriving communities (page 26)			
97.	South West Coast Path Association	We echo the concern on page 26 which recognises the lack of public transport. This is important to long and medium distance walkers. The ever-decreasing provision of public transport militates against them, and the economic benefit they bring	Noted
98.	Individual (019)	<p>HOUSING AND HOMES</p> <p>There are enough buildings and homes if we make use of those already here - minimise new build. Support self-build</p> <p>POPULATION</p> <p>Young adults and young families, needing to live and work on Exmoor, are the priority for Exmoor's rapidly ageing, retirement and second home population.</p>	Noted. The Delivery Programme will pick up many of these issues, working with partners through the partnership groups.

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		<p>PARTNERSHIPS Responsibilities on Exmoor, currently managed by District, County and Town Councils, Housing Assocs, Health Services, Police, Fire and Rescue, environment agencies, rivers authorities, forestry and game activities, need to be Partners in, and responsible to, the National Park Plan for their interventions. The villages, hamlets, parishes, and towns need to be in a closer, structured partnership with the National Park - partners with a say in paradise, not rivals.</p>	
99.	Individual (020)	<p>My scepticism of how much of this within the gift of a National Park Authority - or its Partners. And perhaps we need to acknowledge that there may be sacrifices involved in living in a National Park? Exmoor's National Park boundary was drawn to effectively exclude larger settlements and therefore the nature of Exmoor's small dispersed rural population effectively means that it is not possible to provide the full range of desired services and facilities within the National Park? These are generally provided at key urban centres surrounding the National Park such as Minehead, Taunton, Tiverton, South Molton, Barnstaple and Ilfracombe. The Exmoor National Park Authority - like other planning bodies - is clearly under great pressure from Central Government to promote new house building. But I'd suggest that many Central Government initiatives appear perhaps not to have been fully thought through in relation to National Parks? If we go on as we are then the essence of what people value in the Exmoor National Park is very much at risk. It is not possible to have many more people, many more cars and many more houses without spoiling the essence of Exmoor. The total number of cumulative consents that are being granted for sensitive rural settlements in and adjoining Exmoor National Park is disturbing? Perhaps we should keep in mind that taking up residence in a National Park in the US is no longer allowed? Affordable housing for local people is a laudable aim but what's the track record? Has</p>	<p>Within Exmoor National Park, there are special circumstances in delivering housing: National Parks have the highest status of protection in relation to landscape and scenic beauty. Where constraints exist, national policy allows for fewer homes to be planned for against housing need projections, recognising that National Parks are not suitable locations for unrestricted housing and general housing</p>

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		<p>anybody studied what the results have been so far? How many have found their way on to the free market making a profit for their initial residents? Young people are leaving rural areas right across Europe (indeed most of the world). From a dismal economics point of view it can only be stopped in National Parks by subsidy? Why? It's not economically efficient. Particularly if it has costs in terms of the environment in a protected area? And many youngsters might actually do better by moving to urban areas - at least for a period?</p>	<p>targets are, therefore, not provided. The expectation is for local plans to prioritise affordable housing for local needs.</p> <p>The newly adopted Local Plan seeks to address the housing needs of Exmoor's communities, while ensuring the area is conserved and enhanced. The Local Plan is monitored and an annual Authority Monitoring Report produced which is available on the National Park Authority website.</p>
100.	Individual (020)	<p>I welcome the ambition that Exmoor's local communities should retain strong connections to the National Park - and I'd suggest that interest in, and knowledge of, the National Park is not perhaps as high as it should be? Imaginative schemes like the Exmoor Curriculum at the Dulverton Middle School aimed at helping children in the larger settlements to better understand Exmoor have ceased.</p> <p>A possibly related thought which the Authority might consider? There are probably now many thousands, or tens of thousands, of descendants of</p>	<p>Noted. This will be passed on to the Learning and Engagement Panel to consider in relation to actions for the Delivery Programme</p>

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		<p>people from Exmoor and its surrounding area in Canada, the USA, New Zealand and Australia. Many are starting voyages of research into their family history. We do get a fair sprinkling coming through already and staying at local B&Bs and knocking on peoples doors asking for further information! There are of course the Devon and Somerset record offices, and lots of online genealogy facilities. There is nothing however remotely as polished or sophisticated as the help the Irish currently offer. There may be a lot of mileage here both in generating significantly higher spending by visitors, and even more significantly in strengthening the ties between the people of the past and the present on and around Exmoor?</p>	
101.	Lynton & Barnstaple Railway	<p>Encouraging productivity and routes to employment especially for young people can be achieved by providing apprentice opportunities in trades/skills that are transferable to the general local economy. Perhaps an 'Economy' section could be added to support the prosperity ambition to include provision and support for facilities that generate employment and encourage particularly young workers to stay in the local area.</p> <p>The re-instatement of the Lynton & Barnstaple Railway within the Park is perhaps the most significant potential boost to prosperity and employment that will occur during the next five years in the western Park.</p> <p>Current planning applications provide part of this with the route into Lynton as the following stage.</p>	<p>Please see response to No. 87.</p> <p>Within the Prosperity ambition are specific ambitions around 'A strong local economy' including pathways to employment for young people. Corresponding actions will be developed with partners in the delivery action plans.</p>
102.	Exmoor Uprising	Support the Ambition and the Strategy bullet points listed	Noted
A Valued Asset (page 27)			
103.	Individual (020)	<p>This section seems a bit of a muddle? It promotes Exmoor as an asset ready for commercial exploitation? If this page remains I'd suggest that it sets out instead a discussion of Professor Helm's ideas of looking at Exmoor as a set of natural capital assets?</p>	<p>Noted. The intention is for this section to link to work being undertaken in relation to Exmoor's natural</p>

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			and cultural capital but also to recognise the role of the National Park and its value to the nation as a whole
Moorland. (Page 29-30)			
104.	RSPB	Currently, the ambition for moorland and its supporting text does not adequately capture the importance of the habitat components of moorland. We welcome the sentence at the beginning of paragraph three, but it is important that it is clear that this mosaic includes the gorse, bracken and scrub component of moorland and that the plan recognises these as habitats in their own right. It is this diversity that makes the moorlands so important for birds. We would like to see these habitats described more positively as part of the moorland narrative, while recognising they need to be managed to provide a mosaic and landscape that meets the needs of wildlife and moorland users alike.	Noted and agreed. Amend para 3 to add reference to mosaic of moorland habitats including gorse, bracken and scrub and the need to maintain a mix, although the focus of the Ambition is to redress the current balance between these and reverse the loss of heather.
105.	RSPB	Our strategy – moorland conservation. We welcome the strategy for management practices that conserve wildlife. It is important that this dovetails with the ‘Rich in wildlife’ ambitions and the actions being developed through the Nature Conservation Action Plan.	Noted and agreed
106.	Devon Wildlife Trust	Strategy Point 2: add to end ‘as part of a dynamic mosaic of habitats and landscapes’ Current wording Moorland conservation: the causes of change are understood. Management practices maintain open moorland landscapes, conserve	Noted. This would be covered by the proposal to amend para 3 to add reference to mosaic of moorland habitats in

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		wildlife and the historic environment, and build resilience to climate change	response to comment 104.
107.	Individual	You have drawn attention to the Knight family's transformation of moorland into grassland and in theory breaking up the iron pan to facilitate drainage could transform much of the remaining moorland to grassland. What control do you have over agricultural practices in the National Park?	Noted. The National Park Authority has no control over agricultural practices other than in relation to our statutory functions (such as planning)
108.	Forum 21	<p>Moorland. While we support this ambition we note from the State of National Park report the issue of under-grazing on many areas of moorland, and the changes to habitat extent and condition that arise from this. We also note, as discussed in our comments on farming systems above, the risks and opportunities that may arise very soon from changes in agricultural policy. Putting these two issues together there may be a risk that it will become even more difficult to rely on integration of moorland management with active farmed systems. Responses to this will need innovative management practices and a willingness to contemplate significant habitat change in some areas. Judgements of the desirability of such change should be based on rigorous, ecosystem service-based assessments of management and habitat options, and not simply be based on recent vegetation states being regarded as the optimum. It could be, for example, that, for habitats other than heather moorland, habitats different than the existing habitats would deliver biodiversity benefits while retaining open moorland character.</p> <p>We note from supporting evidence that key species formerly using moorland habitats, such as lapwing and ring ouzel, have been lost to Exmoor in recent decades. This suggests that habitat extent and condition is not optimum for these species. We would recommend that feasibility of</p>	Noted. The inclusion of a specific Ambition on Monitoring and Research reflects the need for a strong evidence base. The Delivery Programme will include specific actions for example monitoring vegetation change. It will also include natural capital assessments.

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		habitat management designed to encourage the return of these species is researched and tested.	
109.	Individual (031)	Needs a more imaginative, realistic and ecologically based ambition.	Noted. This Ambition has been extensively debated with partners including the Moorland Board and Nature Conservation Advisory Panel and is worded to be ambitious but recognising the real challenges in achieving it
Farmland (Page 31-32)			
110.	RSPB	We welcome the reference to wildlife rich habitats in the supporting text, including the importance of unimproved grassland. We trust that emphasis on protecting and enhancing this habitat will be a focus for delivery. We also welcome reference to the importance of hedges for wildlife, though would argue that hedges with a mix of native shrubs are better for wildlife if appropriately managed, than a pure beech hedge. It is also important to recognise the importance of mixed farming in providing habitat for wildlife. For example, the farmland bird surveys from 2002 and 2010 which covered three areas of Exmoor (Porlock Vale, Withycombe and the Brendon Hills), showed that mixed farmland offered the best habitat for birds, with declines and losses of species in areas dominated by dry, improved grassland, despite a network of good hedges. We would therefore like the plan to consider the mix of farmland habitats as part of delivering the ambition for a 'healthy natural environment'.	Noted and agreed.
111.	RSPB	Our strategy – we welcome the High Nature Value farming reference and providing a home for nature alongside food production. As with moorland, it	Noted.

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		will be important consider the farming and wildlife actions together to maximise delivery against both themes.	
112.	Devon Wildlife Trust	Strategy Point 3: suggests nature comes second in this relationship. Consider changing to 'Exmoor's nature and farming find an equal home in the farmed landscape' Current wording: High nature value farming : farmland provides a home for nature alongside food production	Noted and agreed.
113.	NFU	There is no mention of succession for farming. Given its importance within the structure of a farming business this should be noted. There should also be some mention of supporting farms to modernise their infrastructure. The farmland section essentially considers only on the conservation and heritage side of farming. Much of this is dependent on having a strong core part of the farm within the more open moorland. There is a need for recognising the productivity of the grassland and livestock.	Noted. This is covered in the Working Landscapes Ambition under Prosperity
114.	FWAG SW	The section covers the wildlife, landscape and heritage. Is there space to reference how extensive grassland farming systems can protect other elements of natural capital such as carbon in soils, water quality (you may consider this is covered in Rivers and Streams but that tends to river more to the channel and riparian habitats). Supporting these within the strategy is important as they will need to form a core element of any future agri-environment scheme on Exmoor if we are to make the case for the maximum income.	Noted and agreed. Add text in the Working Landscapes Ambition under Prosperity
115.	Forum 21	Farmland. While we support the ambition we believe that the radical changes in agricultural financial support systems that are likely to be a consequence of the UK's exit from the European Union may bring strong pressures for changes in land-use, especially in severely disadvantaged areas. If this is the case then the NPA will need to have a framework in place to lead or quickly respond to these changes. Application of such a framework need not necessarily lead to retention of active farmed systems throughout; such an outcome may be unachievable in practical terms due	Noted. The implications of Brexit for future policy and funding are highlighted in challenges and opportunities set out in the 'Changing landscapes section'

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		<p>to the new economic conditions and revised agricultural support systems. It will be vital for the NPA to understand the implications of various policy options and to influence change as far as is possible in the direction of core National Park purposes.</p> <p>We note the striking statistics presented in the supporting evidence, State of National Park report, 2017, regarding the breakdown of farm business incomes, which show that in the latest year presented Exmoor farm businesses:</p> <ol style="list-style-type: none"> 1. Averaged an extremely modest net income per farm that must mean that many farms are already of marginal viability. 2. Made a net loss on agricultural production. 3. Generated net income only through a relatively modest proportion of farm diversification and, most strikingly, for the most part through Single Payment Scheme and Agri-Environment schemes, both of which derive from the EU's Common Agricultural Policy. <p>This evidence underlines the vulnerability of Exmoor upland farms to changes in agricultural support systems and market conditions that may arise from the UK's forthcoming exit from the EU. We note that many pro-Brexit politicians currently argue that Brexit gives an opportunity to reduce "distorting farm subsidies". While the government has given undertakings to continue current levels of support through to the planned next election date in 2022, the end date of this partnership plan, trading and market conditions within the planned period are much more uncertain. It is therefore possible, or even likely, that significant changes will commence before 2022, and we believe that the Partnership Plan should acknowledge and plan for the risks and opportunities that such changes may bring.</p> <p>We support a key recommendation of the Policy Exchange report, Farming Tomorrow¹, published August 2017:</p>	<p>and also under the 'Working landscapes' Ambition. ENPA is working with partners including the Exmoor Hill Farming Network to influence the future direction of policy and funding, including the potential to pilot a future scheme on Exmoor which would take an outcomes-approach and look at payments for ecosystem services</p>

¹ <https://policyexchange.org.uk/publication/farming-tomorrow/>

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		<p><i>The UK should replace the CAP with a new British Agricultural Policy which focuses on payments for ecosystem services (or natural capital) and phases out production subsidies and income support by 2025. Any remaining subsidies should be redirected towards protection for natural and public goods, and increasing R&D to boost innovation and the sector's long-term productivity</i></p>	
Woodland. (Page 33-34).			
116.	RSPB	<p>We welcome the strong reference to the wildlife importance of woodlands and fully support the ambition. However, in the third paragraph of the supporting text, while we recognise there will be opportunities to grow different types of tree from a timber perspective, there are potential risks here to wildlife habitats and associated species. There could also be a potential reduction in habitat for nightjar if forestry clear fell systems move towards continuous cover. We suggest a slight adjustment to the end of this sentence: '...but also bring additional threats for our woodlands in terms of pests and diseases and potential risks to native wildlife'.</p>	<p>Agreed. It is not likely that continuous cover would fully replace clear fell systems. However, reference to the wildlife implications of changes will be added. There should also be a reference to landscape impacts of such changes.</p>
117.	Devon Wildlife Trust	<p>We have concern that while bringing all of Exmoor's woodlands into management might have good intentions (i.e. for wildlife and landscape as well as productivity), the outcome may be woodlands managed for productivity at the expense of other features. Perhaps better to say 'we would like to see all of Exmoor's woodlands well managed for their landscape, wildlife, heritage and, where appropriate, productivity'.</p>	<p>This is covered by the wording of the Ambition</p>
118.	Devon Wildlife Trust	<p>There is no mention of planting new trees and woodlands, which could be effective measures for increasing resilience</p>	<p>Agreed. Add wording in supporting text</p>
119.	Forum 21	<p>Woodland. We support the ambition and would like to add the following comments.</p>	<p>Noted. This is something that the Woodland and</p>

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		We recommend extension of Community Woodland approaches to woodland management. Community Woodlands can deliver biodiversity gains and a range of benefits to people - physical and mental health through recreational activity and access to nature, woodfuel delivery to people in fuel poverty, carbon emission displacement, for example.	Forestry Advisory Group will consider for the Delivery Programme.
120.	Woodland Trust	<p>We welcome the opportunity to comment on the Exmoor Partnership Plan and are pleased to be working with you in the area.</p> <p>The Woodland Trust welcomes the recognition of the distinctive, unique and precious woods, trees and hedges within Exmoor and the importance of protecting and conserving these for landscape character, for wildlife and for people.</p> <p>We welcome the commitment to increase the level of woodland across Exmoor that is in effective management.</p> <p>However, we would again emphasise three vital elements that we would like to see promoted within the Partnership Plan:</p> <p>1) Protection of irreplaceable ancient woodland</p> <p>The length at which ancient woodland takes to develop and evolve (centuries, even millennia), coupled with the vital links it creates between plants, animals and soils accentuate its irreplaceable status. The varied and unique habitats ancient woodland sites provide for many of the UK's most important and threatened fauna and flora species cannot be re-created and cannot afford to be lost.</p> <p>Approximately one quarter of priority UK Biodiversity Action Plan species are associated with woodland habitats. Forests, woods, and trees make a significant contribution to biodiversity, and ancient sites are recognised as being of particular value. Due to their longevity, ancient woodlands are more species rich, and are often refuges for specialist woodland species that struggle to colonise new areas.</p> <p>Strong protection and good management of ancient trees is essential, as is the development of a succession of future ancient trees through new</p>	Agreed. Add wording in supporting text

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		<p>tree planting and new wood pasture creation, and to raise awareness and understanding of the value and importance of ancient trees. Some ancient and veteran trees are reaching maturity and it is essential that a long term view is taken to plant, restore and manage the ‘ancients of the future’.</p> <p>2) Restoration of planted ancient woodland sites Conifer crops lead to low light levels which threaten the survival of native plants, fungi and animals that have established over hundreds of years. The Woodland Trust aims to promote restoration work with the aim of gradually letting the light back in to encourage plants to recover and reverse years of decline. We believe this work is essential on Exmoor to restore the biodiversity of ancient woodland.</p> <p>3) Targeted creation of new woodland Trees & woods can play a significant role in sustaining the landscape scale connectivity that underpins ecological resilience and helps combat climate change effects. The addition of new and diverse woodland creation to buffer and extend our depleted and fragmented habitats can all significantly help resilience and help combat climate change effects. All of these issues have particular salience in the context of Exmoor’s diverse landscape character. The Woodland Trust looks forward to continuing to work with the National Park, and other partners, in securing woodland management and the planting of new trees and woodlands in and around Exmoor. We would welcome the opportunity to work with you on the detail of the Delivery Programme.</p>	
121.	West Somerset Council	<p>Exmoor WoodCert; There is an accredited wood supplier scheme now launched in UK (Woodsure ready to burn – see attached; http://woodsurre.co.uk/firewood-ready-to-burn/). UK emission inventories show particulate matter (PM) emissions to have increased significantly since 1990 from biomass combustion. Small particulate matter emissions</p>	Noted. This will be considered by the Woodlands and Forestry Advisory Group

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		are known to have adverse health impacts. An accredited supplier scheme is preferred to others without such QA. Fuel switching ; The UK's Air Quality Expert Group (Defra, 2017) showed the choice of appliance is important (fuel switching) especially the more harmful PM. There are appliances already on the market ready for new Eco Design standards, that are factors lower than conventional stoves / boilers.	
Rivers and streams (Page 35)			
122.	Devon Wildlife Trust	Ambition is a cold statement that doesn't capture the life of these features including wildlife, people and culture	Noted. Proposed changes to the Ambition will pick up some of these points
123.	FWAG SW	Can farmers be included under the reference to the Headwaters of the Exe	Agreed
124.	Exmoor Rivers and Streams Group	we have 3 main areas of concern in respect of content. In our view there is: <ul style="list-style-type: none"> - a relatively weak focus on rivers and streams which are a defining aspect of Exmoor's landscape and of vital significance as a wildlife habitat; - an understatement of the importance of the unique riverine fauna and flora; - and an almost complete absence of any recognition of the fact and relevance of the role of owners in safeguarding Exmoor's special qualities. 	A number of changes have been made throughout the document in response to detailed comments from the Exmoor Rivers and Streams Group
125.	Exmoor Rivers and Streams Group	Include new separate 2nd bullet point under 'Our Strategy' as follows <ul style="list-style-type: none"> • Enhanced habitats: the ecological status of Exmoor's rivers and streams is improved as a habitat, <i>and the wide range of flora and fauna they support is publicly valued and effectively monitored</i> • <u>Riverine Fauna and Flora: are better publicly understood and valued and their condition effectively monitored</u> 	Agreed

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		(Note – This separation results in an obvious amendment to the existing 1st bullet point but achieves a clearer focus for a distinct range of actions in the Delivery Programme.)	
Coast (Page 36)			
126.	Somerset Wildlife Trust	Our main activity with respect to Exmoor NP is along the coast as you doubtless know as we continue the first complete Somerset inter-tidal survey. With this coastal work especially in mind we would be interested in a closer working relationship with the ENPA and with Exmoor NP generally	Noted. Offer of closer working is welcomed
127.	Devon Wildlife Trust	Strategy Point 4: This is weak and doesn't really deal with the issue. Consider amending to read: Prepare for the future: changes in the coastline are responded to, and new opportunities secured. Particular issues to be addressed include renewable energy, coastal change and flood risk Coastal changes are viewed as natural processes which create new opportunities for nature. Naturalising of the coast will also help address flood risk. Sensitive sustainable economic opportunities including renewable energy will be explored and where appropriate supported'	The wording of the strategy point is intended to reflect the uncertainty over future changes which might be much wider than allowing natural processes to take their course, although there may be scope for this in some circumstances.
128.	South West Coast Path Association	We are concerned about the perceived conflict between the ambitions set out in this document, and a recent decision made by the Authority. This concerns the report published by Natural England on the section of the South West Coast Path which covers Exmoor. This report proposed a number of improvements to the path, designed to enhance access to and enjoyment of the coast, an ambition contained on page 36 of the draft plan. It was most disappointing that the Authority decided to oppose the plan to create a new alternative path around Hurlstone Combe, designed to improve access to the coastline, and avoid a steep and difficult descent,	We note the difficult decision and range of views regarding route safety around Hurlstone Point and remain committed to ensuring walkers have a great experience on

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		particularly as that plan was formulated by Natural England, the landowner, the Association, and the ENP's own ranger team. Clearly, the ambitions contained in the draft plan will only be achieved if the Authority takes them into account when reaching their decisions	the South West Coast Path.
129.	West Somerset Council	Bathing Water Quality; There is no mention also to EU bathing water quality and maintaining these recreational waters, plus informing the public / tourists of these standards and the work with local community and other stakeholders (EA, RNLI / Parish Councils) on initiative to notify of short-term pollution events.	Noted. Issues affecting Bathing Water Quality will be picked up in the Delivery Programme
Settlements and the Built Environment (Page 37)			
130.	Individual (011)	I think that the National Park could and should put some emphasis on the ports and harbours in the Park. There are several which are real honeypots for visitors and are easily accessible by road and can be "hubs" along the S.W.Coast path. Even Watchet which is outside the park gets a lot of interest from visitors (not just because of the mud).	Noted. This will be considered in relation to relevant actions for the Delivery Programme
131.	Individual (020)	I also welcome the ambition that "local distinctiveness and historic character and Exmoor settlements and built environment are conserved and enhanced". Planning and policy on the settlements also requires further thought? The role of the National Park Authorities in the settlements seems at present to be restricted to planning approvals and designating Conservation Areas? Should National Park Authorities have additional powers for instance to offer funding and advice for enhancement and/or possibly town planning type advice in pursuit of National Park objectives? Traffic (including large vehicles, commercial deliveries, and rat runs across the National Park) and car parking, are pressing concerns, I'd suggest the new Partnership Plan seeks to reconcile the interests of residents, visitors and tradespeople, whilst preserving the uniqueness of Exmoor – and particularly its tranquillity and relative wildness. The National Park Authority should also continue to work with the Highway Authorities, Parish and District Councils and other	The National Park Authority has worked with a number of communities and partner organisations over the years to deliver a range of enhancement schemes in settlements across the National Park, and continues to do so. The Partnership Plan is an important means

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		<p>interest groups in order to explore and implement mutually acceptable traffic management measures to ease the problems caused by traffic congestion within settlements.</p> <p>The new Plan should monitor the pressures and trends affecting settlements on Exmoor, including the costs imposed by tourism and events. The biggest problem is perhaps that of scale? What is tolerable for the Special Qualities and residents on a small scale can be intolerable on a big scale.</p> <p>Some ideas for action:</p> <ul style="list-style-type: none"> - there is a very deep gulf between policy on about Exmoor’s settlements and on Exmoor’s landscape. The focus is very much on the latter - with an overwhelming emphasis on “landscape” and “views”. The relationships between the two merits further study if the special qualities of Exmoor are to be successfully preserved? - the new Partnership Plan should monitor the pressures and trends affecting settlements on Exmoor, including the costs imposed by new housing, new and enlarged businesses, traffic, visitors and tourism and events. The biggest problem is perhaps that of scale? What is tolerable for the Special Qualities of the National Park - and for residents - on a small scale can be intolerable on a big scale? - should National Park Authorities have additional powers for instance to offer funding and advice to town councils for enhancement and/or possibly town planning type advice in pursuit of National Park objectives? 	<p>of setting out this approach – and future actions may develop opportunities (including identifying the potential for funding) and for such enhancement schemes.</p> <p>Two communities have commissioned traffic management solutions that help to conserve and enhance the settlement whilst addressing key traffic issues. However, availability of funding is not always sufficient to implement such engineered schemes, as a one-off solution. These schemes are therefore likely to become a longer-term aim.</p>
Monitoring and Research (Page 39)			
132.	Devon Wildlife Trust	We are concerned that this has an ambition but no strategy for delivery. In light of the current political and funding climate, it will be essential to identify	The need for specific monitoring and

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		key strategic areas for this ambition. This could simply be to carry out the State of the Park report and to identify opportunities for future research, monitoring, enhancement and delivery	research will be identified through the Delivery Programme and will feed into future updates of the State of the Park Report.
133.	Forum 21	We welcome the State of National Park report, but would like to see it made more comprehensive and up-to-date. For example, we could not locate any data on progress made towards the National Park's ambition to become a carbon-neutral National Park, an objective that has been in place since 2013. The insightful data on farm business incomes would be even more helpful if it was more current than 2011-2014, and with more analysis of the breakdown of cost-centres identified.	The State of the Park Report is based on the most up to date information available. Data is not always available on a National Park basis which means that specific studies have to be commissioned. The purpose of updating the State of the Park Report every five years is to review the evidence base and enable the limited resources available to be targeted at the most significant gaps. Further details about farm business incomes is available in the source document

No.	Respondent	Comment	Response & recommended action
			'The State of Farming on Exmoor 2015' by CCRI
134.	Forum 21	As for future monitoring and research we recommend that, in addition to the excellent programmes already included, a major priority should be a comprehensive assessment of the Park's Natural Capital, together with the ecosystem services that flow from this capital, and the benefits provided to people. Such an assessment will be essential to underpin evidence-based decision making at a time that, due to the UK's exit from the European Union, may bring the most fundamental changes to the area since the National Park was established.	Noted. A project to produce Natural capital accounts for Exmoor and Dartmoor National Parks is just commencing, led by Exeter University as part of the South West Economy and Environment Programme
Delivery (Page 40)			
135.	RSPB	<p>Because the delivery plan is separate to the partnership plan, it may be helpful for this section to explain more about the various groups, their membership and role. At this stage, it is not always clear how ambitious the ambitions are, and the number and scale of actions needed to deliver them is not known and therefore nor is the scale of the resource needed. An important part of the delivery process will be the co-ordination of actions where there is cross over between themes, to maximise delivery opportunities and facilitate the transformative actions/projects to achieve the plan's ambitions.</p> <p>It is also important that the action plans/delivery programme is available publically so that it is clear how the plan will meet its ambitions. This is especially important for a partnership plan owned by all.</p> <p>Finally, it would be good to include a statement in the plan on how the outcomes will be measured and reported</p>	Noted. Further information about the Delivery Programme and partnership groups will be made available on the ENPA website.

No.	Respondent	Comment	Response & recommended action
136.	NFU	The change of the name of the plan from Management Plan to Partnership Plan is very understandable and helpful and reflects well the duty in the Environment Act 1995 to “have regard to” the purposes of the National Park. This obviously applies to statutory bodies but also includes farmers, landowners, NGOs, local communities, local businesses and people that come to the area for leisure and recreation. A key challenge will be how these relationships are governed and add value to each other. The plan could give a listing of different partners and their role in helping to achieve the ambitions of the plan. This could be shown within the stakeholder ladder of engagement where at the bottom some are purely interested in information sharing and at the top some are co-deliverers	Further details of the partnership groups and how the Plan will be delivered will be made available on the Exmoor National Park Authority website.
137.	Exmoor Society	The Society assumes that strategic overview groups (a new name?) will decide the delivery of the actions for the plan. These groups have grown in number from the 12 in the present plan and some are made up of single issues, neglecting the bigger picture such as the fact that the environment is part of the economy and they are linked together, not separate. Further, it is timely to remember that the Government Inspector reporting on the recently adopted Local Plan, said ‘It is important to note that the statutory duty to seek to foster the economic and social wellbeing of the local communities within the national park is to be met in pursuing the national park purposes, not independently of them.’ Multiple objectives across the plan need to be integrated otherwise unintended consequences and even failure can occur. The Society is not clear on how this integration will be achieved, nor on how and how often monitoring will be reported during the lifetime of the Plan.	Further details of the partnership groups and how the Plan will be delivered will be made available on the Exmoor National Park Authority website. A review of the existing groups is underway to consider their fit with the new Partnership Plan and improve linkages across groups
138.	Individual (030)	The Delivery Programme is the most important part of the Plan as it will set out the actions and partners responsible for implementing them. There are too many actions in the current plan in my opinion, and also too many partners responsible for implementing them in some cases. This makes	The Plan is deliberately called a Partnership Plan in recognition of the wide range of partners who

No.	Respondent	Comment	Response & recommended action
		<p>accountability more difficult. Has there been an evaluation of the current Partnership Plan?</p>	<p>are involved in its delivery. The actions are included in a separate Delivery programme to enable flexibility for these to be updated and changed and to avoid the Plan itself becoming outdated.</p>

Comments from consultation events, meetings and farm postcards

Consultation briefing events

- Generally welcome the Plan which is well written and accessible
- Would like to see Exmoor ponies, red deer and distinctive breeds specifically referenced in the Ambitions
- Need an action to monitor improvement in the pure bred Exmoor ponies to demonstrate the benefit of the breed
- Welcome the acknowledgement in the Plan that things need to change and the intention is not to preserve Exmoor in aspic. Cultural heritage is not one point in the past but an ongoing process of how communities develop
- The long term sustainability of the National Park relies on how people respond to it
- Exmoor brand is really important. Need to use this to explain why Exmoor National Park is so special
- Moorland Ambition. Support this. Need to map moorland and where restoration could occur
- Agree that farming is important but also need to accept that natural processes will be a part of how we manage landscapes in the future. This doesn't necessarily need to conflict e.g. areas where natural regeneration of woodland (or new woodland planting) would be beneficial.
- Thriving Communities Ambition - Question the Strategy point relating to an effective transport network. This might be true in the west of the Park but not in the east.
- Delivery. Need to explain who is on the partnership groups and the role of partners. Ensure that partners work together and not across each other
- Tb in red deer is a big problem in some areas (e.g. Grabbist). Lack of hunting is allowing diseased deer to survive and spreading the disease.
- Inherent conflict between promoting more visitors and conservation e.g. Porlock Marsh where increased access by dog walkers is affecting wildlife
- Seeing a lot more large motor homes on the moors
- Moorland Ambition. Support this. Current management is not delivering. Reduction in livestock numbers and lack of winter grazing has led to increase in scrub, birch, gorse & bracken (e.g. on Dunkery). Putting stock out in the summer won't control scrub as there is too much grass available. Need to do more mechanical cutting.
- Support sustainable tourism and links to farming e.g. Exmoor Horn Sheep wool project

Comments from farm postcards

- Support for continued upland livestock farming
- Continued support for broad environmental management not just specific sites

- Development of niche markets for local farm produce
- Support for local housing and opportunities for new farm entrants
- Promotion of Exmoor as a farmed environment
- Capital grants for hedging and walling will help the landscape and keep young people on Exmoor
- NP logo given to businesses – free use ‘ we are in the Park and proud of it’
- Open access to all areas, e.g. Kipscombe Common – keep the fences/metal posts less intrusive (especially when weathered – New Zealand use black ones)
- EFHN – must continue – aims of organisation are vital
- Do not follow NT’s lead
- Work with people – all on similar wave length. Rather than just advising – they have ownership and NT achieves aims
- Reasonably priced houses but not starter/ affordable homes
- Proactive – encourage you to improve things – advice/support
- NP extension of NG – how seen but NP not doing very much – promote activities more
- Allow winter common grazing – 12 month use – better use of active management - more cattle on moor (TB restricted – NP sign up good)
- Research done ought to be conveyed in simple terms to farmers and ways in which management can be tweaked/improved
- Hedge grants good – keep funding
- Peaceful pastoral atmosphere for the psychological wellbeing of visitors to Exmoor
- Small grazed fields, not large monocultures
- Annual maintenance payments should be available for the continuance of the rural idyll of Exmoor
- Capital grants should be made available for hedge laying and maintenance for environmental and leisure reasons
- Annual payments should reward open access biodiversity – public goods
- PES should be negotiated to reward benefits to commercial companies, e.g. carbon sequestration and water storage/cleaning
- Keeping young people on the moor
- Soil management and training
- Hemlock Water Dropwort – this native invasive and extremely toxic plant is widespread and dense over all of Exmoor’s waterways. Perhaps it is time for a discussion with ENPA, the EA and land owners to check and eradicate this plant. We have spoken about this before after I lost a cow. I wonder how many have lost stock from eating Hemlock.
- Your ambitions are strong on people (in this case not farmers) enjoying Exmoor. In many cases they have a right to do so. The Plan should stress that every right has an obligation associated with it. Obligations include following a Country Code or an Exmoor code. Keep away from cows with calves, shut gates, etc.

- Research into the importance of permanent pasture and soil types for carbon capture and water retention, plus best practice re management
- Help for local breed societies (Exmoor Pony Society, Devon Cattle Breeders, Exmoor Horn and Devon Closewool) to promote the breeds (rather than direct payments to farmers)
- Help with controlling Hemlock Water Dropwort and Ragwort (could be done at the same time as Japanese Knotweed spraying, which has been very successful)
- A programme of farm visits throughout the summer for visitors, along the lines of open farm Sundays and help with all the rules and regulations concerned.
- More about farming year in Exmoor Visitor
- Sadly, I think an Exmoor Brand for meat is a non-starter due to the wide variety of breeds, seasonality of supply and lack of local abattoirs
- Shooting is ruining Exmoor, for locals and visitors
- Thank you for all the support the ENPA is giving to its farmers. It is appreciated!
- Continued agri-funding/subsidies but in a fairer more targeted system, i.e. getting paid for actions/projects rather than area of land
- Advertising or making public more aware of a new system like that so the public perception of farm subsidies is improved
- More flexible working partnerships between landlords and tenants with better consultation/communication to achieve a common goal (rather than a them and us mentality)
- Improved links with local supermarkets to ensure local people are eating local products
- Focussed effort on encouraging succession rights are offered to young farmers hoping to take on family farms; or
- Sensible length FBT's offered as first refusal to young farmers hoping to take on farms to provide them with a stable platform to start their own business

Comments from Exmoor Hill Farm Network consultation event

- Each ambition has a series of problems/challenges. Who do we take these to?
- What is the situation with heather beetle and apparent lack of swaling?
- Ambitions seem to slant towards visitors predominantly.
- Where are the economics for people who visit and live here?
- The Partnership Plan 'brushes' across this, but what do visitors actually take away with them? Do they learn about Exmoor's grass- fed food?
- B&B guests frequently complain that the high hedges and narrow roads are difficult. But no subsidies to help manage hedges.

- The lack of visitors keep Exmoor special. Too many will spoil it.
- What percentage of Exmoor's Income comes from farming, tourism and forestry? If farming decreases, will tourism have to increase?
- Educating tourists- to become Exmoor ambassadors. Pleased to hear suggestions re farm-based education. Help to train farmers to run events/training sessions.
- Missing generation of 20-30 year old visitors.
- Many international students walking SW coast path.
- Next 10 years more cattle and sheep needed. Dependant on next payment system, next generation of farmers. For young farmers the principle objective is farming, not diversification, they are entrepreneurial. Helping youngsters is the best way to keep farmers on Exmoor.
- Mobile phone reception- issues with Airband which doesn't work well for some properties. Not suitable for the topography. It would be better for local contractors to put in the infrastructure. Same with Western Power- take too long and too expensive. Could there be a local partnership to deal with contracting for things like this? Would support local contractors and be more cost-effective.
- Not much mention of being innovative, taking a risk in the PP- There's an appetite to 'try our own thing'. The Exmoor Ambition has it but it should be in the whole Partnership Plan. Recognition that there might be times when we get it wrong, but that's acceptable.
- How do we join up different interest groups? SOG's, eg., B& B businesses and farmers?