

Consultation Statement

EXMOOR NATIONAL PARK LOCAL PLAN 2011 - 2031
PUBLICATION DRAFT
JUNE 2015

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1 Introduction

- 1.1 Exmoor National Park Authority is required to prepare a Consultation Statement to accompany the submission of the Exmoor National Park Local Plan 2011-2031 to the Secretary of State, in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 [regulation 17(d)].
- 1.2 This statement complements the following documents:
- LDF Stakeholder Consultation Report (2009) – scoping issues and options
 - Overall ‘Your Future Exmoor’ Feedback Report (2010) –Issues & Options
 - Local Plan: Vision, Objectives, General Policies & Options Consultation Report (2012)
 - Draft Local Plan: Schedule of Representations (2013)
- These documents together with the Consultation Statement demonstrate that Exmoor National Park Authority is compliant with the requirements set out in the Statement of Community Involvement and local planning regulations.

2 Purpose of the Document

- 2.1 The purpose of this document is to set out a statement of how the Authority has involved the local community, stakeholders and statutory bodies in the development of the Exmoor National Park Local Plan.
- 2.2 This statement explains how consultation has been carried out at key stages in the preparation of the Local Plan, which methods of communication were used and how the responses received have influenced the Pre-Submission Draft. The statement will address the following requirements:
- The organisations and individuals who were invited to make representations,
 - How they were invited to make representations,
 - A summary of the main issues raised as a result of the consultation, and
 - How those main issues have been addressed in the Local Plan.
- 2.3 The Consultation Statement will also summarise the results of the Draft Local Plan consultation, including the main points raised by those engaging with and contributing to the consultation. This will help to demonstrate how these points have been considered by the Authority and accounted for; illustrating that the consultation process has positively influenced the Local Plan.

- 2.4 This statement will also set out how the Authority has acted in accordance with the requirements set out in the Statement of Community Involvement (SCI). The SCI was adopted in August 2006 and sets out the minimum requirements which the Authority must carry out when consulting at each stage of the preparation of the Local Plan and on any other planning matters. The SCI is available to view at www.exmoor-nationalpark.gov.uk/planning/planning-policy .
- 2.5 An updated Draft SCI has been produced and will be consulted on in parallel with the Publication Draft Local Plan. This draft version brings the SCI up to date in terms of changes to the legislative framework for the planning system, incorporating the Authority's values and commitment to engagement, updating engagement methods and providing information about how we will use personal data in relation to the Data Protection Act 1998 and the Local Government (Access to Information) Act 1985.
- 2.6 Following the introduction of the Localism Act 2011, changes to the planning system were introduced in March 2012 with the publication of the National Planning Policy Framework (NPPF). The previous system of the Local Development Framework (LDF) was replaced with a Local Plan and the Publication Draft Local Plan reflects this; however references to the LDF and Core Strategy & Development Management Policies DPD will appear in this consultation statement as these were the correct titles at the time.

Table 3.1 Key Stages of Preparing the Exmoor National Park Local Plan

STAGE	DATE	DETAILS
SCOPING ISSUES AND OPTIONS	December 2008 – January 2009	Three stakeholder workshops were held to scope key issues and options as an important component of preparing for the Core Strategy & Development Management Policies DPD.
ISSUES AND OPTIONS (YOUR FUTURE EXMOOR)	July 2009 – December 2010	Extensive community and stakeholder engagement took place over a period of 18 months, to enable local communities, young people, individuals and representatives of other bodies/organisations to participate in shaping the Local Plan for Exmoor National Park. <u>July 2009 – February 2010: youth consultations</u> Working with children at the First, Middle and Primary Schools within the National Park and nearby colleges to gather the views of young

STAGE	DATE	DETAILS
		<p>people on how they would like to see Exmoor evolve in the future.</p> <p><u>January – March 2010: community events</u> 21 Your Future Exmoor events held in each of the parishes with towns and villages in the National Park. The events were tailored to individual parishes and designed to be interactive and gather views on the matters and issues important to the local community. Two versions of feedback reports were produced for each of the events. A full copy of all the results and comments was sent to the Parish and Town Councils and summary reports were made available to the local community in local services such as shops and pubs.</p> <p><u>March 2010: stakeholder event</u> Your Future Exmoor stakeholder event, based on the community events, for representatives of statutory bodies, organisations and businesses.</p> <p><u>October 2009 – June 2010: visitor survey</u> The survey ran from October 2009-January 2010 and was re-launched in May 2010 with a closing date of 11th June 2010.</p> <p><u>November 2009 – January 2010: resident questionnaire</u> This questionnaire formed a part of the community consultation process, (Your Future Exmoor), and took place in the early development stages of the Core Strategy for Exmoor as part of the LDF. The questionnaire was included within the Exmoor National Park Authority November 2009 edition of Parklife community newspaper.</p>

STAGE	DATE	DETAILS
		<p><u>November – December 2010: Topic Group Meetings</u></p> <p>Group discussions were held with individuals and members of organisations to discuss specific issues relating to housing, climate change, recreation and tourism in greater detail.</p>
<p>VISION, OBJECTIVES AND GENERAL POLICIES – LOCAL PLAN OPTIONS FOR HOUSING AND THE SPATIAL STRATEGY</p>	<p>November 2011 – January 2012</p>	<p>A consultation on the emerging Local Plan was held in parallel with the Exmoor National Park Partnership Plan 2012-2017 – both documents having a shared vision and objectives.</p> <p>In relation to the Local Plan the following aspects were consulted on:</p> <ul style="list-style-type: none"> ▪ The Vision & Objectives ▪ General Policies (overarching strategic policies) ▪ Options for the location of new development and the delivery of affordable housing
<p>DRAFT LOCAL PLAN</p>	<p>November – December 2013</p>	<p>The outcomes of previous consultation and engagement, together with a Sustainability Appraisal, informed the preparation of the Draft Exmoor National Park Local Plan (including minerals and waste policies). Consultation took place over a 6 week period - this was widely advertised and was available for inspection at a number of locations within and around the National Park.</p> <p>Four events were held with Town & Parish Councillors across the National Park and attendance at the Parish & Consultative Forum in Dulverton, to fully inform community representatives of the key aims of the Local Plan.</p>
<p>PUBLICATION DRAFT LOCAL PLAN (Pre-Submission)</p>	<p>June – July 2015</p>	<p>At this stage, the Local Plan is the document that the Authority considers ready for examination. The formal consultation on the Publication Draft Local Plan will be held for 6 weeks. It will be published together with other submission documents to enable representations to be made.</p>

STAGE	DATE	DETAILS
SUBMISSION	Late 2015 – Early 2016 ¹	The Local Plan (including minerals and waste policies) will be submitted to the Secretary of State alongside representations received in response to the pre-submission consultation.
EXAMINATION	Spring 2016 ²	The examination will be held by an independent Planning Inspector who will consider whether the plan is “sound” and legally compliant. Persons who comment on the Publication Draft Local Plan may be invited to appear at the examination.
INSPECTOR’S REPORT	Autumn 2016 ³	The Planning Inspector will produce a report for the National Park Authority which will be published as soon as practicable.
ADOPTION	Late 2016 – early 2017 ⁴	The Authority will formally adopt the Local Plan as its development plan following receipt of the Inspector’s Report.

¹ Indicative dates – timing dependent on the number and significance of consultation comments received at the Publication stage, and whether further amendments and consultation are required.

² Indicative dates – timing dependent on Planning Inspectorate availability

³ Indicative dates – timing dependent on Planning Inspectorate availability

⁴ Indicative dates – timing dependent on the outcome of consultation and public examination

3 Engagement on the Draft Local Plan

- 3.1 The preparation of the Draft Local Plan had regard to early engagement with stakeholder organisations, schools, and local communities. The preparation included close working with ENPA officers and the Local Plan Advisory Group comprising of 14 of the 22 Members of the Authority.
- 3.2 During this period the Localism Act 2011 was introduced in November 2011 which led to the publication of the National Planning Policy Framework in March 2012 and new regulations guiding the preparation of Local Plans in April 2012.
- 3.3 The Localism Act included provisions to revoke regional strategies and structure plans. The South West Regional Strategy and the Exmoor National Park and Somerset Joint Structure Plan Review were formally revoked in May 2013.
- 3.4 The preparation of the Draft Local Plan during this time meant there was opportunity to ensure that any amendments to the Plan that were required as a result of these national changes, could be incorporated prior to consultation.
- 3.5 Formal consultation on the Draft Local Plan was undertaken over a six week period during 4 November to 13 December 2013. The consultation was publicised to encourage engagement in the process in the following ways:
 - A double page feature was included in the November edition of Authority's Parklife newspaper which was delivered to all households within the National Park and some surrounding areas. This article provided a brief synopsis of the Plan and its key aims and advised how people could comment on the Local Plan and where copies would be available to view.
 - The Parklife article was used as a basis for an A4 leaflet to be distributed at key locations within and surrounding the National Park.
 - A summary booklet (A5 format) of the Draft Local Plan was produced which provided a précis of the policies within the Plan, including information on responding to the consultation. The summary booklet was well received as a plain English guide to the Local Plan.
 - Deposit Points: Full copies of the Draft Local Plan, Sustainability Appraisal (SA) and Habitat Regulations Assessment (HRA) were available for inspection at the main council offices for West Somerset Council in Williton and North Devon Council in Barnstaple. Copies were also available to view at the Authority's main office at Exmoor House, Dulverton. Full copies of the Plan were also sent to Parish and Town Councils, local libraries, Local Information Points, and the National Park Centres in Dulverton, Dunster and Lynmouth (both Dunster and Lynmouth had limited winter opening hours – however information was made available at other locations in these communities). At these points, copies of the summary booklet, leaflet and response forms were also made available. The Parish and Town Councils were also sent CDs to enable councillors to easily access the documents.

- Leaflets and posters were also sent for display to other local businesses within Exmoor communities, and leaflets were also sent to schools within the National Park for children to take home.
- A press release was sent out to local newspapers to publicise the consultation and encourage people to engage with the Local Plan.
- A short article was also sent to the editors of parish newsletters to include within the most appropriate edition in relation to the consultation period.
- The National Park website was updated to enable access to all the relevant Draft Local Plan documents including Proposals (Policies) Map from the Home Page. It provided opportunities for the Plan and response forms to be viewed online or downloaded and a link to an online consultation portal.
- North Devon Council kindly shared access to their Limehouse online planning consultation portal to enable consultees to respond via this method.
- Officers attended four meetings arranged with parish councillors across the National Park at Roadwater, Lynton, Winsford and Porlock and a subsequent meeting of the Parish & Consultative Forum at Dulverton. The meetings enabled officers to encourage Parish and Town Councils to respond to the consultation and to communicate the key messages from the Draft Local Plan.
- Individuals, statutory bodies and other organisations whose details are maintained on the ENPA Local Plan consultation database (in accordance with the Data Protection Act requirements) were formally notified of the consultation by letter or email. An email was sent on Tuesday 26th November 2013 to remind consultees of the end date for the Draft Local Plan consultation period.

4 Summary of Responses

Draft Local Plan

4.1 The consultation undertaken on the Draft Local Plan generated 917 separate representations from 144 responses (143 individuals and organisations). The representations are categorised in the following table.

Table 4.1 Representations on the Draft Local Plan

Type of Representation	Number of Representations	%
Support	539	58.8%
Support subject to amendments	59	6.4%
Objections	125	13.6%
General comments	194	21.2%

- 4.2 The representations were generally supportive of the Draft Local Plan with nearly two-thirds of respondents supporting and only 13.6% of comments objecting to aspects of the Plan. Representations were received in the following way: 261 (29%) via the online consultation portal (Limehouse); 564 (61%) via email; and 92 (10%) by letter.
- 4.3 Although the level of engagement was lower than that achieved through the Issues and Options stage during 2010, it is recognised that it would be difficult to achieve such a level of engagement at every stage of the Plan preparation and the resources available at that time were best utilised in engaging organisations and local communities at an early stage to ensure effective front loading of the Plan. Generally the number of responses and level of attendance of the parish meetings suggests a positive outcome in relation to the course of publicity and engagement undertaken.
- 4.4 The number of responses received at this stage far exceeded that of the consultation held during 2011 (in relation to the Local Plan Vision, Objectives, General Policies and Options) this is likely to be due to the fact that the 2011 consultation was held jointly with the National Park Partnership Plan⁵ which may have led to confusion or uncertainty regarding the status or intention of the documents being consulted on at the time, and the fact that only part of the Local Plan was available for comment.
- 4.5 All responses have been read and those received by letter or email were entered on to the database hosted by North Devon Council alongside those responses completed online. This database was used to enter and analyse all the representations to the Draft Local Plan, to produce a Schedule of Responses.⁶ The full Schedule of Responses includes the how these representations were evaluated and considered by officers and members of the Local Plan Advisory Group, in preparing the Publication Draft Local Plan. The responses, how they have been considered, and the agreed actions arising from these, are summarised in the following chapters. Where the responses are from a public body or organisation, these are identified. If not specified, then the response was from an individual.
- 4.6 It should be noted that some changes have been made to the Publication Draft Local Plan as a result of changes to national policy and guidance, or new evidence, as well as in response to consultation comments.

⁵ National Parks are required to prepare a management plan which sets out how a range of organisations will work together to achieve shared objectives for the future management of the National Park and looks 5 years ahead

⁶ Exmoor National Park Draft Local Plan – Schedule of Responses

5 Feedback Summary of the Draft Local Plan Consultation

Section 1: Introduction

Total number of responses to Section 1	43
Total number of responses in support	13
Total number of responses in support subject to amendment	4
Total number of responses in objection	3
Total number of responses providing a general comment	23

Summary of Responses

5.1 Comments were generally supportive of the Plan and its aims and some comments related to the Draft Local Plan as a whole. With regard to the responses received, the following key points are summarised below:

Sustainability Appraisal and Habitats Regulation Assessment:

- Natural England considered that the Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) provided an appropriately detailed and systematic assessment of the Draft Local Plan. Historic England had no specific comments on the SA.
- The next iteration of the SA should further explain the plan's relationship to those of neighbouring authorities and how potential conflicts and opportunities have been identified, and promote a coordinated cross boundary approach (Natural England).

Plan as a whole

- Generally there was a positive response to the Draft Local Plan as a whole as a framework for future development within the National Park including Natural England, Historic England, Exmoor Society, CPRE Somerset and Winsford PC.
- Support for the Plan received from supporters of the reinstatement of the Lynton & Barnstaple Railway.
- Comments regarding whether some of the illustrations would be in colour.
- General comments raised by West Somerset Council (WSC) specifically referred to inconsistent referencing and absence of consistent comparison of census based data in relation to neighbouring local planning authorities. Concern also raised in relation to the absence of a clearly defined development plan strategy making it difficult to identify strategic issues including those which are cross boundary.
- Specific advice regarding formatting of policies including - style of text and use of extensive cross referencing (WSC, The Crown Estate [TCE]).
- The length and complexity of policies to be addressed so as not to exclude potential readers (WSC, South West HARP).

- General layout criticised as not easy to navigate and pagination could be improved.
- Greater clarity required to easily differentiate between the strategic and development management policies and that strategic policies should have sufficient safeguards since development management policies can be altered by neighbourhood development plans – specific policies highlighted (National Trust).
- Concerns raised regarding reviewing the Plan to respond to new evidence/circumstances and retaining the links between the Local Plan and the Exmoor National Park Partnership Plan – as the Partnership Plan is reviewed and updated on a shorter timescale (Exmoor Society).
- Community engagement could be improved (Cutcombe PC).
- Your Future Exmoor consultation events appreciated by the schools.
- Plan provides opportunities for potential impacts to be minimised at the pre-application stage (Somerset County Council [SCC]).

Introduction

- WSC commented that the wording of the text implied that the National Park, in the production of the Local Plan, is exempt from the provisions of the NPPF due to paragraph 14 and its footnote in relation to the presumption in favour of sustainable development where specific policies in the NPPF indicate development should be restricted⁷. WSC considered that the footnote referred to recognises the special status conferred on such places is used as an example only and relates to their application in the context of other policies contained within the NPPF. National Parks are only specifically referred to in policy terms within the NPPF in paragraph 115.
- The National Parks Circular of 2010⁸ is specifically highlighted as having no mention of planning and the NPPF forms the latest government statement in relation to planning policy (WSC).
- The need for an assessment of open space, sport and recreation facilities (Sport England).

Officer Comments and Recommendations

- A number of comments related to the formatting and complexity of the Plan as a whole including the length of policies and cross referencing. It is recognised that the legibility of the Plan is important to users and the text and layout of the Plan will be reviewed and updated accordingly.
- In relation to the issue regarding Census statistics, it is worth noting that National Park areas only have a limited number of key statistics produced to enable

⁷ Footnote 9 of the NPPF states: For example, those policies relating to sites protected under the Birds and Habitats Directives (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion.

⁸ Defra (2010) - English National Parks and the Broads: UK Government Vision and Circular 2010; Department for Environment Food and Rural Affairs

comparison with neighbouring areas, and 2011 census statistics for National Parks did not include certain indicators identified in the 2001 census regarding travel to work. Specific tables are intended to be commissioned from the Office for National Statistics to help address this issue.

- A comment relating to community engagement was misinformed in relation to the extent that the consultation was publicised and materials made available to households, local businesses and communities across the National Park on the back of extensive community engagement events which helped shape the Local Plan. This information is set out within this Consultation Statement.
- In terms of reviewing the Plan, legislation allows for the review of Local Plan where evidence suggests there is a need. The Plan will be monitored on an annual basis to consider the effectiveness of the policies.
- The point raised regarding the absence of a clearly defined development plan strategy will be addressed through the provision of strategic priorities to align with the Vision and Objectives set out in Section 2 of the Plan. These priorities will be reflected in the ENPA Duty to Cooperate Protocol.
- It is not intended that the text within the introduction should read that the National Park is exempt from the NPPF, it is reflecting the wording of footnote 9 within the NPPF which highlights specific policies in the framework where development should be restricted (in relation to paragraph 14 and Local Plans meeting objectively assessed needs); this includes National Parks which have statutory purposes set out in legislation. The NPPF and the National Parks Circular are guidance and need to be taken account of in plan preparation but always with regard to the statutory purposes.
- The National Parks Circular is still extant and guides long term planning and strategic decision making including specific references to the key role National Park Authorities have as planning authorities in protecting the National Parks and fulfilling the socio-economic duty; including supporting the delivery of affordable housing and maintaining thriving rural economies.
- Preliminary work on the Open Space Strategy for Exmoor National Park has informed the Draft Local Plan. This work has been reviewed and updated and will be published as evidence underpinning the Publication Draft Local Plan. The OSS will provide an analysis of the open space, sport and recreation facilities within or adjoining settlements on Exmoor and identifies whether or not there are specific needs, deficits or surpluses of these facilities with regard to quality, quantity and accessibility.

Agreed actions

1. The next iteration of the SA to have regard to cross boundary relationships with neighbouring authorities.
2. The Publication Draft will be printed so all maps and illustrations within the document are in colour, and formatting and referencing will be checked and updated.

3. Review the length and complexity of policies, including cross referencing.
4. Ensure the Plan is legible.
5. Improve differentiation between strategic and development management policies.
6. Strategic priorities to be included within Section 2 to define the development plan strategy for Exmoor National Park together with the General Policy for the Spatial Strategy.
7. Publish the Exmoor National Park Open Space Strategy.

Section 2: Vision, Objectives and Strategic Priorities

Total number of responses to Section 2	9
Total number of responses in support	4
Total number of responses in support subject to amendment	1
Total number of responses in objection	1
Total number of responses providing a general comment	3

Section 2: Summary of Responses

- Comments broadly supported the vision and stated objectives of the Plan.
- Comment raised in relation to the process of measuring the objectives.
- WSC stated the need to have a clear development plan strategy to identify the strategic issues (including those which may be cross boundary to be addressed through the Duty to Cooperate).
- An amendment was suggested by Historic England (HE) to strengthen the vision in relation to the historic environment.
- An objection related to the promotion of sustainable transport to access key services and facilities and whether this was realistic given the limited opportunities available for residents/visitors to access these via alternative modes of transport given the dependence on the private car. Suggested that the text includes reference to cooperative working with neighbouring authorities to help achieve these aims (WSC).

Officer Comments and Recommendations

- The headline vision statements are shared with the published Exmoor National Park Management Plan 2012-2017 therefore there will be no scope to amend this aspect of the Plan; however, it is considered that the supporting text provides suitable context in relation to the conservation and enhancement of the historic environment.
- The Plan will have a monitoring framework to help assess whether the Plan is having the intended effect. The monitoring framework will be included within the Publication Draft version of the Local Plan and will consist of appropriate core and contextual indicators.

Agreed actions

1. An additional 'monitoring framework' section to be included within the Publication Draft Local Plan to explain how the Plan will be monitored.
2. Strategic priorities to be included within Section 2 to define the development plan strategy for Exmoor National Park.
3. The Authority's response to the Duty to Cooperate to be explained in Section 1 Introduction.

Section 3: Spatial Portrait

Total number of responses to Section 3	13
Total number of responses in support	2
Total number of responses in support subject to amendment	0
Total number of responses in objection	3
Total number of responses providing a general comment	8

Section 3: Summary of Responses

Support

- Comments in support of this section were specific to tourism and the reinstatement of the Lynton & Barnstaple Railway, and sustainable construction helping to reduce carbon emissions.

Objections

- WSC commented on the appropriate referencing of the 2011 census statistics, and the spatial context of how the larger settlements outside the National Park relate to the road network and settlements within the National Park, in the key diagram.
- A further objection related to the perceived marginalisation of the role of Greater Exmoor Shoots Association (GESA).

General Comments

The majority of responses were general comments relating to minor points such as corrections, referencing and citing appropriate sources of information. Other comments included:

- Supporting opportunities for employment and suitable housing to support a varied demographic.
- Encouraging cross boundary integration to enable access to services and facilities in larger centres outside the National Park through the Duty to Cooperate and providing a clear development plan strategy (WSC).
- No mention of disabled access in the Plan.
- Designating area/s in which mobile signals would be reduced or avoided to monitor impacts on wildlife.

Officer Comments and Recommendations

- It is noted that the spatial portrait is a snapshot of the National Park at one particular point in time based on the most up to date evidence available. New evidence will be available throughout the preparation of the Plan to enable the spatial portrait to accurately reflect the context of the National Park in terms of specific characteristics and how it relates to neighbouring areas.
- In relation to cross boundary integration the Plan does reflect that Exmoor's population access a range of key services in larger urban centres surrounding the National Park. The strategic priorities of the Plan will be inserted in section 2 of the Plan to support the development plan strategy. They will also be reflected in

ENPA's Duty to Co-operate Protocol setting out cross boundary strategic priorities where ENPA will need to cooperate with neighbouring authorities.

- The Achieving Enjoyment For All section provides greater detail in relation to the contribution of game shooting to Exmoor's economy. The Spatial Portrait provides an overview of the National Park characteristics and the issues the Local Plan seeks to address.
- In relation to disabled access, several aspects of the Plan address this issue including policies for design and sustainable construction, housing, and parking provision and standards.
- The policy approach for mobile infrastructure technology ensures that it is designed and sited appropriately to conserve and enhance the National Park including its wildlife.

Agreed actions

1. Review and update information in accordance with new evidence and ensure references are cited appropriately.
2. Strategic priorities to be included within Section 2 to define the development plan strategy for Exmoor National Park.
3. Maps and diagrams will be printed in colour.

Section 4: General Policies

Total number of responses to Section 4	83
Total number of responses in support	13
Total number of responses in support subject to amendment	9
Total number of responses in objection	44
Total number of responses providing a general comment	17

INDIVIDUAL GENERAL POLICY RESPONSES

Total number of responses to GP1 National Park Purposes & Sustainable Development	11
Total number of responses in support	2
Total number of responses in support subject to amendment	2
Total number of responses in objection	2
Total number of responses providing a general comment	5

GP1: Summary of Responses

Support

- We welcome GP1 and the clear identification and role of the historic environment in the policy (HE).
- Important for NDC to ensure that new development outside the National Park that could potentially affect the National Park's setting does not conflict with the vision and objectives (NDC).

Support subject to amendments

- Local Plan should ensure a balance is struck to both meet the overall purposes of the National Park and meeting the Park Authority's duty of fostering the economic and social well-being of local communities.
- The Exmoor Society accepts that GP1 must be the first and overarching general policy; however, a closer link should be made in GP1 to draw attention to the NPPF which states that Local Plans should meet objectively assessed needs unless specific policies indicate development should be restricted, and gives examples including National Parks. This would help to ensure an understanding, by the public, that many restrictions to development are not generated by the National Park itself, but are required by the NPPF.

Object

- Policy wording is far too prescriptive for an over-arching general policy. Much of the policy-wording is aspirational in content would be better located as part of an explanation or justification in the supporting text to the policy. Policy refers to the National Park's statutory purpose and duty which is unnecessary as the legal status will always have precedence over development plan policy (WSC).
- Text implies that National Park legislation and the status it confers extends beyond the National Park boundary (WSC).

General Comments

- Absence of a clearly defined development plan strategy for Exmoor National Park makes it difficult to identify the strategic issues both within and outside of the Exmoor National Park that may need addressing through the 'duty to co-operate' and to determine the focus of the development plan (WSC).
- The paragraph repeats the three sustainable development roles of the NPPF without stating or elaborating on how these are proposed to be applied within the National Park (WSC).
- More incentive should be given to replace poor quality buildings or those in poor condition with new and more sustainable buildings.
- The Park purposes are plain to understand and succinctly explained.
- I think it is important to ensure there is owner occupier housing available for middle income households who make significant economic contribution to a community and help to safeguard local services.
- Using the term 'where appropriate' is meaningless unless stating what is and is not appropriate. 'Where possible' would make more sense.

Officer Comments and Recommendations

- Policy GP1 aims to meet the statutory purposes of the National Park and address the social and economic duty which together achieves the key drivers of sustainable development. The Policy will be reviewed taking into account other strategic policies in the Plan, to ensure the Plan is clear, concise and deliverable.
- It is noted that the NPPF gives great weight to National Parks and the text explains that they are also protected through the legislation. Policy GP1 aims to give clarity over the general approach to development in the National Park set out through the National Park statutory purposes and duty and a series of principles for sustainable development. The written justification will have further explanation regarding the NPPF and sustainable development in the National Park.
- Any wording referring to the achievement of National Park statutory purposes will be carefully considered in relation to Section 11A(2) of the National Parks and Access to the Countryside Act 1949 and the Duty to Cooperate (Localism Act 2011). It is clear in legislation and planning practice guidance⁹ that relevant authorities (which include any public body) shall have regard to National Park statutory purposes in all decisions and activities that may affect land within a National Park including activities undertaken outside National Park boundaries that may affect land within them.¹⁰
- The strategic priorities of the Plan will be inserted in section 2 of the Plan to support the development plan strategy. They will also be reflected in ENPA's

⁹ Planning Practice Guidance (online June 2015) Natural Environment - Landscape Paragraph 003 Reference ID: 8-001-20140306 <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/landscape/>

¹⁰ Natural England (2010) England's statutory landscape designations: a practical guide to your duty of regard – Natural England

Duty to Co-operate Protocol setting out cross boundary strategic priorities where ENPA will need to cooperate with neighbouring authorities.

- The Achieving Thriving Communities section includes housing policies that allow for some market housing, as principal residence housing, to enable the delivery of affordable housing; this also applies to new units created through sub-division of existing dwellings.
- The terminology ‘where appropriate’ is considered to be suitable in the context of Policy GP1 which contains headline policy statements that are explained in greater detail in subsequent sections of the Plan.

Agreed actions

1. The written justification for policy GP1 will include further clarification regarding the presumption in favour of sustainable development and where development should be restricted.
2. Include information in relation to the Duty to Cooperate in Section 1 Introduction to explain how the Authority will engage constructively with neighbouring local planning authorities (amongst other organisations) to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary issues.
3. The policy will be reviewed in relation to other strategic policies in the Plan.

Total number of responses to GP2 Presumption in Favour of Sustainable Development	4
Total number of responses in support	1
Total number of responses in support subject to amendment	1
Total number of responses in objection	2
Total number of responses providing a general comment	0

GP2: Summary of Responses

Support

- Support received from Somerset Rural Youth Project.

Support subject to amendments

- Sport England supports the NPPF presumption in favour of development and states that the Exmoor National Park Local Plan should reflect National Planning Policy regarding protecting sport facilities for indoor and outdoor sport.

Object

- Policy implies that the National Park Authority is the only decision-making body in respect of use of the Local Plan (WSC).
- Policy refers specifically to the application of the NPPF. This is unnecessary in the text of the policy itself as the Local Plan and its policies have to reflect and be consistent with the guidance provided on sustainable development in the relevant paragraphs in the NPPF (WSC).

Officer Comments and Recommendations

- In relation to the provision of sport facilities, specific policy addresses this provision and safeguarding of existing facilities in the Achieving Thriving Communities section.
- Policy is consistent with model policy wording issued by the Planning Inspectorate following the publication of the National Planning Policy Framework and the wording is similar to variations used by other Local Plans that have been successful at examination.

Agreed actions

1. GP2 Presumption in Favour of Sustainable Development – this policy will be deleted as it is no longer required in Local Plans. It remains as a material consideration in the NPPF.

Total number of responses to GP3 Major Development	6
Total number of responses in support	2
Total number of responses in support subject to amendment	1
Total number of responses in objection	3
Total number of responses providing a general comment	0

GP3: Summary of Responses

Support

- NDC support the policy and major development outside the National Park should not conflict with the vision and objectives.
- Policy approach supported.

Support subject to amendments

- Historic England (HE) states that it would be more equitable to the aims of achieving sustainable development if similar weight were given to the historic environment in the policy, as the natural environment.

Object

- The National Trust (NT) suggests that anything falling within the definition of major development in The Town and Country Planning (Development Management Procedure) (England) Order 2010, be considered major but that the National Park make clear it retains the discretion to determine whether development of a lesser scale might also be deemed 'major' on a case by case basis.
- Policy implies that the National Park Authority is the only decision-making body in respect of use of the Local Plan (WSC).
- The text of the second part of the policy is more descriptive in content and would be better located in the supporting text to the policy itself (WSC).

Officer Comments and Recommendations

- Generally there was an even split between supporting and objecting comments on the major development policy. In the context of ‘major development’ as set out in paragraph 116 of the NPPF, there is no prescribed definition of what type of development this may involve. Appeal decisions have helped to inform a general view and in respect of such decision a legal opinion¹¹ has been provided for the South Downs National Park.
- It is considered that the definition of major development in the 2010 Order (Article 2) is only relevant to the order and should not be applied as the definition of ‘major development’ in the context of major development in National Parks set out in paragraph 116 of the NPPF. There have been more recent appeal decisions cited in the legal opinion regarding the similar major development policy in NPPF where inspectors have taken a different view to the appeal cited in the response.
- It is considered that the text in the second part of the policy is required in order to have the necessary weight to future decision making.

Agreed actions

1. Policy will be amended so it no longer refers to the National Park Authority as set out in clause 2.
2. Include reference to both the natural and historic environment.
3. The policy will be amended to define major development in the context of scale, character and nature; taking into account the potential impacts of the proposed development on the National Park and in its local context.

Total number of responses to GP4 Spatial Strategy	55
Total number of responses in support	5
Total number of responses in support subject to amendment	3
Total number of responses in objection	36
Total number of responses providing a general comment	11

GP4: Summary of Responses

There are several objections to this section; however objections may relate to one or more paragraphs in the supporting text and there will be some repetition for some specific objections (e.g. the same objection relating to a range of paragraphs will be counted separately for each paragraph it relates to) – the basis for these will be summarised in the section below.

Support

- Strongly support this choice of development allocation as it spreads the benefits most widely.

¹¹ Maurici, J. (July 2014): In the Matter of the National Planning Policy Framework and in the Matter of the South Downs National Park Authority - Opinion

- Porlock Parish Council very much welcomes the inclusion of Porlock Weir in the spatial strategy.
- The Exmoor Society strongly supports the policy and the inclusion of Rural Communities in the spatial strategy. Believe that confining building, in Rural Communities, to the provision of local need affordable housing with no cross subsidy is sound.
- The National Trust supports the designation of Dunster as a Local Service Centre.
- Dispensing with settlement boundaries and the adoption of the settlement hierarchy is sensible.

Support subject to amendments

- Concern that the policy is unnecessarily complicated and some of the policy criteria which, as drafted, are ambiguous and could lead to planning applications being determined in an overly cautious manner (South West HARP). Further clarification required relating to:
 - How the term 'low environmental value' (in relation to brownfield sites) will be addressed?
 - Definition of 'building group'.
 - How capacity of a settlement is intended to be assessed?
- Only allowing new build housing schemes within rural communities where it wholly satisfies local need affordable housing, and not permitting cross subsidy from 'principal housing' or 'specialist housing'. TCE state that this does not accord with the NPPF and the need for a glossary to define particular terms such as 'principal residence' and 'specialist housing'.
- NDC support the policy subject to criteria to clarify the sustainability requirements to new build proposals in the open countryside.

Object

- The following objections to this policy received from WSC include:
 - Absence of reference to any economic criteria and justification informing the choice of settlements within the settlement hierarchy. No reference to how Exmoor residents make use of key services and facilities by settlements outside of the National Park and how these external locations relate, in role and function terms, to settlements within it.
 - The village of Dunster has been elevated in status to that of a Local Service Centre, alongside the settlements of, Dulverton, Lynton & Lynmouth and, Porlock. No justification is provided for this in the accompanying text. This raises a number of issues with respect to the older part of the settlement and, how it relates to the surrounding area in terms of the role and function it provides to these residents, including: increase in dependence by the local population on Minehead, increase in dependence on the private car; pressure for further development at Dunster Marsh (outside the ENP) contrary to the emerging WSC Local Plan. (This point was reinforced by separate consultation response from WSC Housing Enabling Officer).

- The text of the Local Plan should acknowledge and reflect the influence of Dulverton on the surrounding communities both within and outside of the National Park.
- Text provides basic definitions of the different types of settlements in the 'settlement-hierarchy' but gives no indication of the criteria by which settlements are judged in terms of scale or, role and function.
- There may be spatial and strategic implications of the differences in development plan definitions for the two parts of the settlement (Monksilver and Withycombe) split by the National Park boundary. This could be a cross-boundary (LPA) issue that would best be dealt with as part of the 'Duty-to-Co-operate'.
- Concern that Porlock Weir is denied 'Village' status and instead a CCMA (Coastal Change Management Area) is to be prepared which will focus almost totally on replacing lost housing and facilities, with no prospect of Affordable Housing for the Porlock Weir community. Need to ensure that a comprehensive development proposal is produced for Porlock Weir which looks at the needs of the community and allows both for replacement facilities and the development of the community.
- Request to include the Lester Point area, at the western edge of the Exmoor National Park, as a settlement within the Local Plan.

General Comments

- In relation to Porlock Weir - the need for affordable housing exists because the settlement provides employment and services to both the local community and visiting public.
- The list of facilities at Porlock Weir omits any mention of the settlement's defining asset which is the harbour.
- There is a need to make consistently clear throughout this Local Plan that the 'capacity' for development identified in the Landscape Sensitivity Study is 'landscape capacity' only, as the study itself makes explicit.
- What happens if the settlements lose the services/facilities that help to identify it as a settlement within the spatial strategy?
- Subdivide the category of 'Village' even further to reflect the different challenges settlements face.
- The spatial strategy is very sensible and well-constructed.
- Concern over the low level of brownfield sites in the National Park.
- WSC comment that it is important to ensure that the two Local Planning Authority Area's Plans complement each other insofar as is possible in order to best meet the needs of communities - particularly where there are cases of split parishes.
- Simonsbath, perhaps should be considered a rural community rather than a 'village'.
- A statement should be added relating to the Landscape Sensitivity Study and the capacity for development within settlements.

Officer Comments and Recommendations

- Support for the spatial strategy was received from a number of organisations. However, there were a number of objections received from West Somerset Council in relation to the evidence supporting the strategy and particularly in relation to settlements split or adjoining the boundary between the National Park and the West Somerset local plan area; these being Dunster, Monksilver and Withycombe. There are spatial and strategic implications raised in relation to these settlements which are, as suggested, cross-boundary issues that should be dealt with as part of the 'Duty-to-Co-operate' and further work will be necessary to ensure that all the relevant evidence to support the spatial strategy is in place.
- The key issues for Duty to Cooperate discussions are the status of Dunster within the spatial strategy and to ensure there is a coherent cross boundary approach in relation to the settlements of Monksilver and Withycombe.
- To underpin the settlement hierarchy set out within the spatial strategy, a technical paper has been produced to consolidate all the relevant evidence relating to characteristics settlements (including information provided in tables within the Exmoor's Settlements section of the Plan - 11.1 Settlement Services and Facilities Overview and 11.2 Settlement Capacity). References to further information include that arising from the Strategic Housing Land Availability Assessment (SHLAA) in addition to the Quantitative Needs Assessment which provides information relating to retail and leisure sectors which will also provide detail regarding relationships with key centres outside the National Park. This objective assessment of available evidence to underpin the spatial strategy has resulted in Dunster changing status to a Village, which has been discussed through the Duty to Cooperate with WSC. The Plan will be amended accordingly.
- The status of settlements within the hierarchy was also raised by other respondents:
 - Porlock Weir – the approach in the Plan is to enable the relocation/replacement of properties at risk of coastal change over the Plan period. It is clear that the Draft Shoreline Management Plan statement of 'no active intervention' in relation to coastal management will have an impact at Porlock Weir. The Authority has therefore proposed that Porlock Weir is identified within a separate category of the spatial strategy; as a settlement at risk of coastal change. The suggestion that affordable housing should also be acceptable within the settlement will need to be considered in terms of the landscape capacity of the settlement to accept additional levels of development and the extent of the coastal change management area (CCMA).
 - Simonsbath – the status of this settlement within the spatial strategy has been questioned and the further work to provide objective evidence to underpin the strategy will help to confirm its status.

- Lester Point, Combe Martin – this small area of Combe Martin within the National Park, is defined as open countryside, as the main area of settlement and therefore the focus for development is outside the National Park within the North Devon local plan area. This area should remain as ‘open countryside’ as it is considered inappropriate to address affordable housing need in this area for Combe Martin as a whole, due to potentially unacceptable adverse impacts on landscape character and visual amenity affecting the setting of Combe Martin and the surrounding open landscape of Lester Cliff as a backdrop to the dramatic, elevated, open and exposed High Coastal Heaths landscape.
- Splitting the Village settlement category is not considered to be justified in relation to the type of development which can be supported. The settlements within the Village category have a range of services and facilities, not all being the same. The policy approach will enable the provision of housing and employment development to address local needs which will help to support existing community facilities
- Once adopted the status of settlements within the spatial strategy will not change unless the substantial evidence leads to a review of the Local Plan.
- On reflection, there is a need for further explanation regarding some of the terminology used in the policy and supporting text which has been highlighted through the consultation. This terminology will be reviewed (in revisiting the policy language as a whole) to check whether it is necessary, if it can be explained in another way, or a definition is provided.
- It is considered, for reasons of potential adverse impacts on the scale and character of small rural communities, that it would be inappropriate to provide for cross subsidy to fund affordable housing in these locations - consistent with National Park purposes. Rather it is envisaged that this policy approach would enable in principle self-build affordable local needs homes.
- In relation to comments on the absence of development boundaries, these have been not been drawn as the approach to housing in the National Park is based on a rural exceptions site¹² approach for affordable housing to address local needs.
- There is and has been historically generally a low level of identified brownfield sites within the National Park. However, brownfield sites may become available at any time through buildings and land becoming redundant or through change of use. The policy ensures that brownfield sites or existing buildings are considered before greenfield sites.

¹² A rural exceptions site is defined in the National Planning Policy Framework as: “Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. Small numbers of market homes may be allowed at the local authority’s discretion, for example where essential to enable the delivery of affordable units without grant funding.”

Agreed actions

1. Amend the spatial strategy following the production of the Settlement Hierarchy Technical Paper and subsequent discussions through the Duty to Cooperate. Change the status of Dunster to a Village.
2. Amend references to the term 'capacity' throughout the Plan so that it is preceded by 'landscape' in the appropriate context to ensure that the meaning of the term is clear.
3. The influence of Dulverton will be clarified The Exmoor's Settlements section with regard to the relationship with surrounding settlements of Battleton and Brushford (identified as Secondary Villages in the West Somerset Local Plan – Publication Draft 2015).
4. Correct policy to ensure the term 'local need' precedes 'affordable housing' under the Villages category.
5. Ensure new development in the open countryside cross references the appropriate policies in the Plan.
6. Glossary of terms to be included in the Publication Draft Local Plan.
7. Reduce the complexity/length of the policy and check whether specific terminology is explained or required.
8. Reference Porlock Weir harbour in the Exmoor's Settlement section.

Total number of responses to GP5 Securing Planning Benefits – Planning Obligations	3
Total number of responses in support	1
Total number of responses in support subject to amendment	1
Total number of responses in objection	1
Total number of responses providing a general comment	0

GP5: Summary of Responses

Support

- Sport England supported the approach to securing provision of new or enhanced places for sport through planning obligations or the community infrastructure levy (CIL).

Support subject to amendments

- TCE were generally supportive of the approach but stated that there should be an up to date Infrastructure Delivery Plan which would inform developers of known infrastructure constraints. Some further clarity regarding CIL was needed to form a judgement about this policy.

Object

- An issue was raised regarding the unquantified terminology for 'harm' which development should avoid, and the context in which the term 'limitations' is used. A further issue regarding CIL and whether the Authority needed to go

through this process given that development rates are low within the National Park.

Officer Comments and Recommendations

- The Authority recognises that an up to date IDP is required in relation to the implementation of the Local Plan and this particular policy. An IDP is being prepared and will be available at the publication stage of the Local Plan.
- The policy and supporting text will be reviewed in terms of the terminology used to check whether it is necessary, if it can be explained in another way, or a definition is provided. The intention of the policy, particularly in relation to a CIL will also be considered.

Agreed actions

1. To publish the IDP at the publication stage of the Local Plan so that the necessary information is in place to support the Local Plan.
2. Review the policy wording and terminology to ensure the intention of the policy is clear.

Total number of responses to GP6 Enhancing the National Park	4
Total number of responses in support	2
Total number of responses in support subject to amendment	1
Total number of responses in objection	0
Total number of responses providing a general comment	1

GP6: Summary of Responses

Support

- Support for the policy approach was received from Historic England.

Support subject to amendments

- Historic England (HE) suggested that there needed to be some clearer definition of and reference to the historic environment rather than simply referring to the cultural heritage of the area. The policy should be strengthened in terms of the design aspect and be clear in what it wants to achieve.

General Comments

- An error was highlighted.

Officer Comments and Recommendations

- Support from HE is welcomed and suggestions to improve the policy approach are noted.

Agreed actions

1. Review the policy in terms of reference to the historic environment and ensure policy aims are clear and concise.

Section 5: Conserving and Enhancing Exmoor

Total number of responses to Section 5	83
Total number of responses in support	37
Total number of responses in support subject to amendment	11
Total number of responses in objection	13
Total number of responses providing a general comment	22

LANDSCAPE

Includes comments on Section 5 as a whole.

Total number of responses to CE-S1 Landscape Character	11
Total number of responses in support	4
Total number of responses in support subject to amendment	0
Total number of responses in objection	4
Total number of responses providing a general comment	3

CE-S1: Summary of Responses

Support

- Policy CE-S1 Landscape Character was supported by Historic England (HE)¹³, Exmoor Society, and Exmoor Trust.
- NDC particularly recognise cross-boundary opportunities to conserve and enhance the landscape setting of the National Park in areas of contiguous landscape character.

Object

- The policy includes no mention of coast or seascape. Whilst the Heritage Coast is identified on map 5.2 the undeveloped coast has not been spatially defined on the Proposals Map which fails to provide cross-boundary consistency across administrative borders in line with the draft Devon Landscape Policy Group Advice Note (National Trust).
- There is concern over the inconsistency in which the Landscape Sensitivity Study¹⁴ has been applied. Also, the application of the testing was restricted to impact within the settlements rather than taking account of the potential land adjoining them (WSC).
- Concern raised that text suggests the Exmoor National Park Authority will seek to influence the nature and scale of development outside of its LPA area when referring to views into and out of the National Park and its setting. Issues involving the setting of particular landscape features which are of a cross-LPA boundary nature need to be addressed by negotiation. Where these are deemed to be of a strategic nature, these should be addressed through the 'Duty to Co-operate' (WSC)

¹³ Historic England – formerly English Heritage when responding to the Draft Local Plan consultation in 2013

¹⁴ Bryan, P. (2013): Landscape Sensitivity Study - Exmoor National Park Authority 2013

- Concern by the Greater Exmoor Shoot Association (GESA) that their role has been marginalised and some of the comments do not recognise the advantages of game shooting to the National Park and the surrounding area.

General Comments

- The Exmoor Society would like to ensure that all possible measures are undertaken to prevent damage to views into and out of the Park.
- Maps to be in colour.
- There is a need to make consistently clear throughout this Local Plan that the 'capacity' for development identified in the Landscape Sensitivity Study is 'landscape capacity' only, as the study itself makes explicit.

Officer Comments and Recommendations

- Whilst the seascape and Heritage Coast are specifically included within the supporting text and the policy, in terms of the undeveloped coast it is not considered that it is necessary to specifically identify this given the National Park designation. Instead the plan distinguishes between open countryside and settlements, considers landscape character types (some of which are specific to the coastal landscape), and the heritage coast designation. The landscape policy will be reviewed to incorporate reference to the Heritage Coast objectives. There will be a strategic policy in relation to coastal development to further clarify the approach to development on the coast.
- Any wording referring to the setting of the National Park will be carefully considered in relation to Section 62 of the Environment Act 1995 and the Duty to Cooperate (Localism Act 2011). It is intended that the plan should acknowledge the National Park's relationship within its wider context particularly in relation to its landscape setting, while ensuring that policies only relate to the area within its boundary.
- The Landscape Sensitivity Study 2013 was undertaken for the 22 named settlements identified in the Local Plan 2001-2011. This study is part of the evidence produced to underpin the Local Plan and builds on the Exmoor National Park Landscape Character Assessment 2007 to assess the sensitivity of the landscape 'within and adjoining' these settlements. The assessment of the landscape sensitivity of settlements informs their capacity to accommodate small-scale development (specifically housing) on greenfield sites within or adjoining the existing town, while conserving and enhancing the National Park's nationally important landscape.
- The supporting text relating to the setting of the National Park is not intended to imply that the Authority is seeking to plan outside of the National Park boundary but will work with partners and neighbouring authorities to ensure its setting is protected. The text will be amended to clarify that this is in accordance with duty to co-operate.

Agreed actions

1. Amend references to the term 'capacity' throughout the Plan so that it is preceded by 'landscape' in the appropriate context to ensure that the meaning of the term is clear.
2. Amend the text to ensure that the scope of the Landscape Sensitivity Study is clear and include a landscape sensitivity study of Porlock Weir.
3. Incorporate reference to the Heritage Coast designation and its objectives and a specific cross reference to the Coastal Development policy.
4. Coastal Development policy to be made a 'strategic' policy.
5. Maps and diagrams to be in colour in the Publication Draft version of the Local Plan.
6. Ensure that text relating to working with neighbouring authorities to protect the setting of the National Park should be in accordance with the Duty to Cooperate.

Total number of responses to CE-D1 Protecting Exmoor's Dark Night Sky	4
Total number of responses in support	2
Total number of responses in support subject to amendment	1
Total number of responses in objection	0
Total number of responses providing a general comment	1

CE-D1: Summary of Responses

Support

- Support received includes welcome recognition and protection of the Dark Sky Reserve (NDC).

Support subject to amendments

- A suggestion that intermittent lighting around remote properties is included for safety reasons.

General Comments

- Particular reference to why street lighting has not been turned off in a particular community.

Officer Comments and Recommendations

- The policy can only be applied to managing lighting for new development proposals. Outside the 'Dark Sky Core Area' there are opportunities for external lighting to be managed in an appropriate way to ensure no unacceptable adverse impacts on Exmoor's Dark Night Sky. The policy does provide for lighting for safety, security or community reasons.
- Street lighting is the responsibility of the County Councils and both Devon and Somerset County Councils advocate part-night lighting and have worked with several communities across Exmoor to achieve this.

Agreed actions

None required.

BIODIVERSITY & GREEN INFRASTRUCTURE

Total number of responses to CE-S2 Biodiversity	7
Total number of responses in support	1
Total number of responses in support subject to amendment	2
Total number of responses in objection	2
Total number of responses providing a general comment	2

CE-S2: Summary of Responses

Support

- Support in relation to provision of pre-application advice (Somerset County Council [SCC]).

Support subject to amendments

- The text/policy should reflect that mitigation is unlikely to succeed in replacing the habitat lost and that the replacement of some habitats is totally impossible e.g. ancient woodland (Exmoor Society).
- Policy should recognise opportunities for an ecosystem services approach to the delivery of new development and to conserving and enhancing cross-boundary biodiversity links to land adjacent to the National Park (NDC).

Object

- NDC recommend that this section ought to reference North Devon's Biosphere Reserve designated in 2002 as the western parts of the Park (catchment of the river Taw) fall within the Biosphere Reserve's Transition Area.
- Policy does not provide the absolute protection that ancient woodland requires and the policy should be amended to address this (Woodland Trust).

General Comments

- Query in relation to whether ENPA has sought expert advice on the potential benefits of large areas of uncontrolled bracken to wildlife and has the advice sought included full details of the potential benefits to wildlife that could be obtained by the control of the bracken and the management of those areas to achieve other forms of habitat.
- Sport England has an objective to maintain and improve sport opportunities for sport and encourage a 'positive for sport approach' in the Local Plan to help meet health and well-being agendas.

Officer Comments and Recommendations

- In relation to bracken and its management, the Exmoor National Park Partnership Plan 2012-2017 contains a priority to maintain the open character of moor and heath where the issue of changes to vegetation and the changes to the visual character of moorland are recognised.

- Maintaining and improving opportunities for sport specifically relate to policies in the Plan to safeguard and provide community facilities and recreation and tourism facilities. These policies recognise and encourage a positive approach to recreation. They also reflect the fact the National Park is an important natural resource for such activities particularly informal recreation based on the special qualities of the National Park.
- The need to specifically reference the protection of ancient woodlands and veteran trees is recognised. Further consideration will also be given to new evidence in relation to woodlands including ecological network mapping and the publication Unlocking Exmoor’s Woodland Potential¹⁵.

Agreed actions

1. The supporting text will be updated to include reference to the biosphere reserve, cross boundary biodiversity links, and ecosystem services.
2. The supporting text and policy will be amended to ensure the exceptional circumstances and requirements for mitigation and/or compensation are robust.
3. The policy and supporting text relating to biodiversity will be amended to reflect the significance of protecting ancient woodland and veteran trees.

Total number of responses to CE-S3 Green Infrastructure	5
Total number of responses in support	3
Total number of responses in support subject to amendment	0
Total number of responses in objection	1
Total number of responses providing a general comment	1

CE-S3: Summary of Responses

Support

- Support received from individuals regarding green infrastructure and access corridors and ensuring the protection of the historic environment.
- NDC welcomes recognition of cross-boundary linkages to help support ecosystem services.

Object

- Policy implies that the National Park Authority is the only decision-making body in respect of use of the Local Plan - wording of policy needs re-phrasing to make it more generic in this respect (WSC).

General Comments

- Sport England would encourage a 'positive for sport approach' Local Plan Policy to enable the existing and future users opportunity to take part in recreational activities that meet health and well-being agendas.

¹⁵ Silvanus et al (2013): Unlocking Exmoor’s Woodland Potential – published online www.exmoor-nationalpark.gov.uk

Officer Comments and Recommendations

- Support for the policy approach is welcomed.
- Maintaining and improving opportunities for sport specifically relate to policies in the Plan to safeguard and provide community facilities and recreation and tourism facilities. These policies recognise and encourage a positive approach to recreation. They also reflect the fact the National Park is an important natural resource for such activities particularly informal recreation based on the special qualities of the National Park.

Agreed actions

1. Policy will be amended to remove reference to the National Park Authority.

Total number of responses to CE-D2 Green Infrastructure Provision	2
Total number of responses in support	0
Total number of responses in support subject to amendment	1
Total number of responses in objection	0
Total number of responses providing a general comment	1

CE-D2: Summary of Responses

Support subject to amendments

- NDC supports the policy approach subject to adding more explicit recognition for recreational opportunities to enhance and expand the cross-boundary green infrastructure network, such as linking to the MacMillan Way, Tarka Trail, Two Moors Way and South West Coastal Footpath.

General Comments

- Sport England would encourage a 'positive for sport approach' Local Plan Policy to enable the existing and future users opportunity to take part in recreational activities that meet health and well-being agendas.

Officer Comments and Recommendations

- The Authority notes the recommendation to include reference to long distance trails which are important examples of cross boundary green infrastructure.
- Maintaining and improving opportunities for sport specifically relate to policies in the Plan to safeguard and provide community facilities and recreation and tourism facilities. These policies recognise and encourage a positive approach to recreation. They also reflect the fact the National Park is an important natural resource for such activities particularly informal recreation based on the special qualities of the National Park.

Agreed actions

1. The text will be amended to ensure that reference to 'cross-boundary green infrastructure network' is reflected in Plan.

CULTURAL HERITAGE AND HISTORIC ENVIRONMENT

Total number of responses to CE-S4 Cultural Heritage and Historic Environment	5
Total number of responses in support	2
Total number of responses in support subject to amendment	2
Total number of responses in objection	0
Total number of responses providing a general comment	1

CE-S4: Summary of Responses

Support

- The policy and cultural heritage section is supported including by Historic England (HE).

Support subject to amendments

- Policy should include buildings and remains of industrial and commercial land.
- The opening paragraph of the policy could usefully include settings (HE).

General Comments

- Comment concerning isolated traditional buildings and whether it is financially viable and practicable to convert them to camping barns.

Officer Comments and Recommendations

- Buildings and the remains of industrial land that are of historic merit are likely to be included on the Historic Environment Record as heritage assets. The policy will be applicable to such assets.
- In relation to the conversion of isolated traditional buildings, the starting point for the Local Plan is the conservation and the enhancement of National Park. It is considered that where the change of use of isolated traditional buildings is proposed that they are best suited to camping barns (unless permitted development rights are applicable). The Draft Local Plan explains that isolated traditional farm buildings are particularly sensitive in terms of their setting and are not suitable for many adaptive uses these can detrimentally impact the setting of the building and landscape character of the area.

Agreed actions

1. Include reference to 'settings' in the policy.

Total number of responses to CE-D3 Conserving Heritage Assets	9
Total number of responses in support	6
Total number of responses in support subject to amendment	0
Total number of responses in objection	2
Total number of responses providing a general comment	1

CE-D3: Summary of Responses

Support

- Support for the policy with a suggestion that industrial archaeological heritage assets should be included.
- SCC support pre-application approach in relation to proposals likely to affect heritage assets.
- Support for specific aspects of the text and the policy (HE).
- Allowing some form of development, in line with the policy criteria, mean viable uses can be found which ensure their survival where necessary (The Crown Estate).

Object

- The wording of the paragraph implies that the National Park Authority is the only decision-making body in respect of use of the Local Plan – wording of the paragraph needs re-phrasing to make it more generic in this respect (WSC).
- Concerns are raised that this policy, whilst well-intentioned, does not align well with the NPPF tests in relation to harm (National Trust).

General Comments

- Comment concerning isolated traditional buildings and whether it is financially viable and practicable to convert them to camping barns.

Officer Comments and Recommendations

- The objection regarding reference to the text implying that the National Park Authority is the only decision making body is not considered to be applicable. The wording in the paragraph is considered appropriate in its context.
- The policy aims to conserve and enhance Exmoor’s historic environment in accordance with National Park purposes. The NPPF will be a material consideration in the determination of any proposals that are likely to result in harm to a designated heritage asset.
- With reference to isolated traditional buildings, please see the officer response to this in relation to the policy above, where the same comment was made.

Agreed actions

None required.

THE CONVERSION OR STRUCTURAL ALTERATION OF BUILDINGS

Total number of responses to CE-S5 Principles for the Conversion or Structural Alteration of Traditional Buildings	8
Total number of responses in support	4
Total number of responses in support subject to amendment	2
Total number of responses in objection	1
Total number of responses providing a general comment	1

CE-S5: Summary of Responses

Support

- Text and policy supported by HE.
- Support for the re-use of redundant traditional 'old' farm buildings, in an effort to allow succession farm dwellings (Exmoor Trust).
- Support for the reuse of traditional farm buildings (National Trust).

Support subject to amendments

- The recent change in permitted development rights associated with the conversion of agricultural buildings was highlighted, and proposals for extending permitted development rights to allow an agricultural building to change use to a dwelling house. ENPA are advised to consider the relaxation of the policy to allow conversions of traditional buildings in principle (The Crown Estate).
- Comment noted that the building should be suitable for the new purpose and conversion of corrugated iron structures is considered to be unreasonable.

Object

- The conversion of traditional buildings should refer to sustainable locational criteria with a requirement for any such conversion to be in an accessible location consistent with the objectives of the NPPF (NDC).

General Comments

- The policy appears to take a balanced approach to the conversion of redundant buildings in line with Government policy (National Trust).

Officer Comments and Recommendations

- Support for the policy is welcomed.
- The changes to permitted development rights for changes of use of agricultural buildings to flexible uses is noted. The Government's report on responses to the consultation Greater Flexibilities For Change of Use has been published. In terms of extending permitted development rights for the reuse of agricultural buildings to a dwelling house, National Parks have been exempted from this proposed change. It is considered that the policies in the plan support the sensitive conversion of existing buildings to housing; providing flexibility for the change of use of existing traditional farm buildings to homes that will meet the needs of local communities on Exmoor.
- The supporting text provides a definition of traditional buildings which can include buildings clad in corrugated iron sheeting in certain circumstances. The policy requires that traditional buildings should be capable of conversion without substantial reconstruction.
- In terms of the issue of locational considerations raised by NDC, these are addressed in other policies within the plan that set out where conversions are considered to be appropriate in terms of specific uses. The policy sets out the key principles in relation to the process of conversion or structural alteration which should be considered and states that proposals should accord with the relevant policies in the Plan in terms of the intended use.

Agreed actions

1. Update the text in relation to changes to the General Permitted Development Order – in the Achieving a Sustainable Economy section.

Total number of responses to CE-S6 Principles for the Conversion or Structural Alteration of Non-Traditional Buildings	5
Total number of responses in support	0
Total number of responses in support subject to amendment	2
Total number of responses in objection	1
Total number of responses providing a general comment	2

CE-S6: Summary of Responses

Support subject to amendments

- Comment noted that the building should be suitable for the new purpose and conversion of corrugated iron structures is considered to be unreasonable.
- Support subject to an additional criterion requiring: any such conversion to result in an enhancement in the immediate setting of the building; no harm to the character and appearance of the rural area; and the need for any such conversion to be in an accessible location consistent with the objectives of the NPPF which seeks to reduce the need to travel and promote sustainable transport choices (NDC).

Object

- Policy implies that the National Park Authority is the only decision-making body in respect of use of the Local Plan – wording of policy needs re-phrasing to make it more generic in this respect (WSC).

General Comments

- The policy appears to take a balanced approach to the conversion of redundant buildings in line with Government policy (National Trust).
- If the property were to be in a climatically damp environment would mean modern materials would be more sustainable than traditional (Porlock PC).

Officer Comments and Recommendations

- The Plan states that some community buildings clad in corrugated iron sheeting may also be considered a traditional building of historic interests (e.g. the church at Porlock Weir). Corrugated steel sheeting has been widely used as a roofing material since the middle of the 19th century and has become part of the farm building vernacular. The policy requires that buildings should be capable of conversion without substantial reconstruction.
- In terms of design and materials, the overriding consideration is the conservation and enhancement of the National Park consistent with statutory purposes. The link to the design policy provides for appropriate use of natural sustainable materials that reflect the vernacular context. This approach was supported at the Your Future Exmoor consultations.

- Agree to refer to enhancement to the setting of the building consistent with NPPF. In terms of accessibility, location and sustainable transport, these principles are specifically in relation to conversion and structural alteration; locational and accessibility considerations are addressed in other policies in the Plan.

Agreed actions

1. Delete the wording “by the National Park Authority” from the policy text.

DESIGN

Total number of responses to CE-S7 Design and Sustainable Construction Principles	12
Total number of responses in support	2
Total number of responses in support subject to amendment	1
Total number of responses in objection	1
Total number of responses providing a general comment	

CE-S7: Summary of Responses

Support

- Support for specific reference in the text and the policy from HE.

Support subject to amendments

- Specific comment relating to the environmental performance and energy/water efficiency of new developments. Specific reference suggested for low emission sustainable designs and high quality SAP design assessments to be submitted. A further recommendation to delete reference to the Design Guide SPG (WSC).

Object

- Standards set too high make low cost housing impossible to build. Only people from outside area can afford to build/buy (Nettlecombe PC).

General Comments

- Need to make consistently clear throughout this Local Plan that the 'capacity' for development identified in the Landscape Sensitivity Study is 'landscape capacity' only (Old Cleeve PC).
- There should be more vigorous control of simple signage (Porlock PC).
- Wherever possible housing needs to be designed to high levels of sustainability and energy efficiency – this does not necessarily need housing to have to comply with specific standards such as 'Lifetime Homes' or the 'Code for Sustainable Housing' as these are not always 'rural proofed' (Rural Housing Project).
- The shading of properties by large trees can be a real problem.
- If the property were to be in a climatically damp environment would mean modern materials would be more sustainable than traditional (Porlock PC).
- Encourage new developments to be designed in line with the Active Design principles (checklist) which could be Local Plan Policy (Sport England).

- Recommendation to use wood as a building/cladding material for new housing on Exmoor and opportunities for prefabricated wooden dwellings to save energy and cost (Exmoor Uprising).

Officer Comments and Recommendations

- The Government's response to the Housing Standards Review¹⁶ has resulted in the consolidation of many technical standards to be included within building regulations. This and the move to zero carbon homes by 2016 will mean that the Code for Sustainable Homes standards are superseded. The Standard Assessment Procedure (SAP) is a technical methodology used to compare the energy and environmental performance of dwellings through Part L of Building Regulations. Part L will be updated to help achieve zero carbon homes by 2016. In rural areas off-gas it is recognised that the main form of heating has been from domestic oil or electricity. The Carbon Neutral Exmoor project has helped a number of communities and businesses across Exmoor benefit from renewable/low carbon energy and has generally provided advice to individuals who wish to install renewable energy technologies. The policy encourages methods to generate energy efficiencies and reduce carbon emissions, however the Government has also introduced changes which negate the need to refer to high quality SAP within the policy. The policy will be amended to make specific reference to reducing carbon emissions and how this may be achieved.
- It is not considered that the policy tests will make low cost housing impossible to build. Sustainability measures are encouraged which also help to reduce running costs (e.g. for energy and water) over the long term. Whilst the aim of providing affordable homes through a rural exception site approach is to ensure land values remain low to help reduce the overall costs to buy or rent (set out in the Achieving Thriving Communities section of the Local Plan).
- Comment relating to signage is more applicable to policy CE-D4 Advertisements, Shopfronts and Private Road Signs, which ensures that the National Park is protected from unnecessary clutter arising from signage and adverts.
- On Exmoor the overriding consideration is the conservation and enhancement of the National Park. The design policy provides for appropriate use of traditional and natural sustainable materials that reflect the vernacular context. This approach was supported at the Your Future Exmoor consultations.
- Active Design principles advocated by Sport England are appropriate for major new housing and master-planning large sites. It is not be practicable to apply these to small-scale development proposals that occur within the National Park.
- The supporting text for the Design and Sustainable Construction Principles policy includes a section relating to materials, design elements and detailing which

¹⁶ DCLG (7 May 2015) Policy paper 2010 to 2015 government policy: building regulation - Appendix 5: technical housing standards review – published online www.gov.uk

specifically refers to timber as a versatile local sustainable material. Such materials will be encouraged in the design of new developments particularly where local sources are used. This policy also encourages sustainable construction methods so that buildings are energy efficient and therefore cheaper and easier to manage. In relation to prefabricated wooden homes, consideration would be given to the scale, massing and appearance of the building in the context of its surroundings and such proposals would be determined in accordance with this policy.

Agreed actions

1. The term capacity will be preceded by the term 'landscape' to ensure clarity.
2. The reference to the 1995 Exmoor Design Guide will be removed.
3. Amend the sustainable construction section of the policy to include reference to reducing carbon emissions including through renewable and low carbon technologies.

Total number of responses to CE-D4 Advertisements, Shopfronts and Private Road Signs	2
Total number of responses in support	2
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	0

CE-D4: Summary of Responses

- Support received from SCC in relation to providing opportunities to protect tranquillity, and Historic England supports the policy.

Officer Comments and Recommendations

- Support welcomed.

Agreed actions

- None required.

MINERALS

Includes comments received regarding the 'Minerals' sub-section of the Plan.

Total number of responses to CE-S8 Small Scale Working or Re-working for Building and Roofing Stone	9
Total number of responses in support	7
Total number of responses in support subject to amendment	0
Total number of responses in objection	1
Total number of responses providing a general comment	1

Support

- The policy approach to the small scale extraction of building stone was supported (Devon County Council [DCC]), HE, National Farmers Union [NFU]).
- Opportunities to protect tranquillity were supported (SCC).
- Small quarries supported by individuals.

Object

- The policy was considered to be too restrictive to enable local quarrying (Nettlecombe PC)

General Comments

- Banking of stone arising from site excavation was proposed and the potential for a small scale building stone extraction without the need for planning approval (Old Cleeve PC).

Officer Comments and Recommendations

- The policy approach allows for small-scale quarrying of building stone within the National Park. Given the National Park's statutory purposes, care must be taken to avoid any unacceptable adverse impacts on the surrounding area and local amenity.
- The policy relating to Waste and Resource Management seeks to minimise construction and demolition waste and reuse on site or through appropriate waste management off-site, which may include banking of building stone resources.
- The suggestion for small scale mineral working without formal planning application would be consistent with putting a local development order (LDO) in place – further investigation would be needed to ensure that this type of LDO would be an appropriate measure within the National Park.

Agreed actions

None required.

Total number of responses to CE-S9 Major Mineral Extraction	2
Total number of responses in support	2
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	0

CE-S9: Summary of Responses

- Support received from DCC regarding the policy approach and the adequate availability of crushed rock aggregate from outside the National Park.
- SCC supported the opportunity to protect tranquillity.

Officer Comments and Recommendations

- Support welcomed.

Agreed actions

None required.

Total number of responses to CE-D5 Interim Development Order Permissions	2
Total number of responses in support	2
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	0

CE-D5: Summary of Responses

- Historic England supported the policy approach.
- SCC supported the opportunity to protect tranquillity.

Officer Comments and Recommendations

- Support welcomed.

Agreed actions

- None required.

Section 6: Responding to Climate Change and Managing Resources

Total number of responses to Section 6	160
Total number of responses in support	134
Total number of responses in support subject to amendment	6
Total number of responses in objection	6
Total number of responses providing a general comment	14

- 5.2 The overwhelming majority of comments received in relation to this section of the Local Plan were in support of the policy aims. In particular, responses from the Environment Agency (EA) formed 110 of the supporting comments throughout the section.
- 5.3 Support from the EA as a specific consultation body, was particularly welcomed in relation to this section which gives assurance to the Plan strategy in responding to climate change impacts and mitigating its effects, managing waste, and seeking to minimise pollution.
- 5.4 Support from adjoining local planning authorities (DCC and NDC) also demonstrates the effectiveness of joint working across boundaries to manage development effectively whilst ensuring the National Park’s statutory purposes are achieved.

CLIMATE CHANGE ADAPTATION AND MITIGATION¹⁷

Total number of responses to CC-S1 Climate Change Mitigation and Adaptation	25
Total number of responses in support	20
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	5

CC-S1: Summary of Responses

Support

- The majority of support for the policy and paragraphs within the supporting text was received from the Environment Agency (EA).
- Further support for the section as a whole was received from NDC particularly with regard to ensuring that renewable energy development outside (but potentially affecting the setting of the National Park) does not conflict with the vision and objectives.
- HE supported the policy approach.

¹⁷ Includes comments on Section 6 as a whole.

General Comments

- Concern raised regarding the merits of reducing carbon emissions. The focus should be on coastal defences and protecting the Porlock coast.
- Concern that the implementation of the policies relating to Climate Change and Renewable Energy may become increasingly difficult without sufficient staff resources (Cutcombe PC).
- Porlock PC recognise the impact of climate change and support the joint initiative on the development of Porlock Marsh as a natural environment asset.
- No mention of orientation of new build or adaptations to maximise south facing aspect of roofs to facilitate installation of solar photovoltaic units.
- Need to encourage small scale hydro-electric schemes.

Officer Comments and Recommendations

- Support for the policy approach welcomed. Support from the EA as a specific consultation body, was particularly welcomed in relation to this section which gives assurance to the Plan strategy in responding to climate change impacts and mitigating its effects.
- With regard to resources available to mitigate and adapt to climate change, the Exmoor National Park Partnership Plan has a priority to make progress towards becoming a carbon neutral National Park. The Authority will continue to work with partners to respond to climate change.
- The policy for Design and Sustainable Construction Principles aims to ensure that new development demonstrates the integration of passive design and sustainable construction methods to improve or generate energy efficiencies and reduce carbon emissions.
- The measures set out in policy CC-S1 and the policy for Low Carbon and Renewable Energy Development will enable small-scale hydro schemes to come forward.

Agreed actions

None required.

Total number of responses to CC-D1 Flood Risk	19
Total number of responses in support	17
Total number of responses in support subject to amendment	0
Total number of responses in objection	1
Total number of responses providing a general comment	1

CC-D1: Summary of Responses

Support

- The majority of support for the policy and paragraphs within the supporting text was received from the Environment Agency (EA).

- Further support for catchment wide land management techniques that utilise ecosystem services to reduce run-off, was received from NDC.

Object

- The Woodland Trust would like reference to using the natural environment (particularly woodland and trees) to help mitigate flood risk.

General Comments

- Comment regarding land management and water storage to minimise flooding.

Officer Comments and Recommendations

- The importance of woodlands in managing flooding is included within the supporting text. The role of land management (including woods and trees) in helping to reduce flood risk is recognised in Policy CC-S1 *'Promoting land management which reduces the overall risk of flooding in and around the area, working with natural processes.'* It was felt to be more relevant within a strategic policy rather than Policy CC-D1, which is a development management policy.
- The policy for water conservation aims to ensure measures are in place to conserve water including on-farm water storage.

Agreed actions

None required.

Total number of responses to CC-D2 Coastal Development	13
Total number of responses in support	11
Total number of responses in support subject to amendment	0
Total number of responses in objection	1
Total number of responses providing a general comment	1

CC-D2: Summary of Responses

Support

- The total number of supporting comments for the policy and paragraphs within the supporting text was received from the EA. EA stated that they would like to be consulted on any sea defence works.

Object

- The Exmoor National Park Local Plan should also include a strategic policy establishing a presumption against development within or affecting Devon's undeveloped coast (Woodland Trust).

General Comments

- Concern that this policy will deter development of the Porlock Marsh area (Porlock PC).

Officer Comments and Recommendations

- Support from the EA welcomed.

- In terms of the Woodland Trust objection, it is not considered necessary to identify undeveloped coast given National Park designation. Instead the plan distinguishes between open countryside and settlements, considers landscape character types which also includes coastal landscapes, and the heritage coast designation as referred to in the written justification. However, the need to change the Coastal Development policy to a strategic policy (CC-S2) is justified as it sets out where development on the coast will and will not be permitted. Reference is also made to Policy CE-S1 Landscape Character which includes Heritage Coast.
- The aim of this policy is to protect the undeveloped coast. Any proposed development at Porlock Marsh should demonstrate that it meets the policy tests.

Agreed actions

1. Change the policy status to a strategic policy.

Total number of responses to CC-S2 Responding to Coastal Change	12
Total number of responses in support	9
Total number of responses in support subject to amendment	1
Total number of responses in objection	0
Total number of responses providing a general comment	2

CC-S2: Summary of Responses

Support

- The total number of supporting comments for the policy and paragraphs within the supporting text was received from the EA. EA stated that they would like to be consulted on and involved in all aspects and any impacts on the Shoreline Management Plan (SMP)¹⁸.

Support subject to amendments

- HE supported the policy approach but recommended that the proposed strategy for Porlock Weir, should consider the impacts upon historic environment and could be linked to policies on recording the historic environment.

General Comments

- Money should be spent on building sea defences to keep out the floods and the Porlock coast should be saved, not abandoned to the waves.
- The policy approach to be expanded so that the plan for Porlock Weir goes further than merely looking at replacement facilities and also looks at the housing needs of the community with a presumption in favour of allowing affordable housing in this settlement which should have "Village" status.

¹⁸ North Devon and Somerset Coastal Advisory Group (2010) North Devon and Somerset Shoreline Management Plan Review Final (October 2010) Hartland Point to Anchor Head

Officer Comments and Recommendations

- Support from the EA welcomed and the reference to consultation on aspects/impacts on the SMP are noted, in relation to the strategy for future development at Porlock Weir.
- In relation to impacts of coastal change upon the historic environment, the supporting text recognises such impacts. Detailed specification for the strategy for Porlock Weir will address such implications.
- In terms of the need for future sea defences, the SMP is a long term Plan for the management of coastal change and has put forward a no active intervention approach at Porlock Weir. In accordance with this approach the Local Plan policy aims to manage the impact of coastal change on communities such as Porlock Weir through the relocation and adaptation of existing buildings at risk of coastal change.
- Porlock Weir – the approach in the Plan is to enable the relocation/replacement of properties at risk of coastal change over the Plan period. It is clear that the SMP statement of ‘no active intervention’ in relation to coastal management will have an impact at Porlock Weir. The Authority has therefore proposed that Porlock Weir is identified within a separate category of the spatial strategy; as a settlement at risk of coastal change. The suggestion that affordable housing should also be acceptable within the settlement will need to be considered in terms of the landscape capacity of the settlement to accept additional levels of development and the extent of the coastal change management area (CCMA).

Agreed actions

None required.

Total number of responses to CC-D3 Water Conservation	5
Total number of responses in support	4
Total number of responses in support subject to amendment	0
Total number of responses in objection	1
Total number of responses providing a general comment	0

CC-D3: Summary of Responses

Support

- Support received from the EA who recommended that a reference to the Water Framework Directive was made.
- Wessex Water also supported the policy and the need for water efficiency measures and the need for development proposals to complete necessary assessments and demonstrate capacity arrangements.

Object

- WSC objected to the policy in relation to the following points:

- It was considered to replicate Part G of building regulations (water efficiency),
- There was a need to ensure a sufficient supply of water in the first instance.
- Missing references.
- Local private abstractions can be a critical local resource – including some shallow aquifers which are vulnerable to periods of extreme weather.
Recommended policy change to address this particular issue.

Officer Comments and Recommendations

- See agreed actions

Agreed actions

1. Clarify the Water Framework Directive as a key policy driver in the supporting text.
2. Address missing references.
3. Add text regarding private water supplies and potential impacts on existing water supplies.

Total number of responses to CC-S3 Low Carbon and Renewable Energy Development	11
Total number of responses in support	8
Total number of responses in support subject to amendment	2
Total number of responses in objection	1
Total number of responses providing a general comment	0

CC-S3: Summary of Responses

Support

- Received support from SCC regarding the importance of protecting tranquillity.
- Support for small scale solar photo-voltaic (PV) panels in accordance with current regulations.
- Support received from the EA which regulates and permits many types of renewable energy technologies – recommend early consultation with the EA to minimise delays.
- HE supported reference to the historic environment in the supporting text, and the policy in relation to landscape and visual impact considerations.

Support subject to amendments

- WSC supported the policy approach but noted that the policy does not appear to support community projects including in relation to hydro-power and biomass. Further consideration should be given to the risk of higher PM10 levels affecting local air quality. Recommended that the local authority is notified of any biomass boilers over 50kW and subject to the approval of the local planning authority.

- HE supported the principle of this policy, however, it could be clearer that it applies to the historic environment. This would assist in forming part of the strategy for the historic environment.

Object

- The National Trust suggested reference should be made to the Devon-wide best practice guidance in the; 'Devon Landscape Policy Group Advice Note 2: Accommodating Wind and Solar PV Developments in Devon's Landscape: Guidance on minimising harm to the distinctive character and special qualities of Devon's landscape through sensitive siting and design'.

Officer Comments and Recommendations

- Support from specific consultation bodies (SCC, HE and EA) welcomed.
- Many solar roof mounted PV arrays have the benefit of permitted development, however small scale solar freestanding solar arrays can be considered under policy CC-D5. Large scale solar arrays would be contrary to National Park purposes and would not be acceptable.

Agreed actions

1. Text will be amended to advise that applicants should consult with the Environment Agency.
2. Reference to the historic environment will be added the policy.
3. Reference to the 'Devon Landscape Policy Group Advice Note 2: Accommodating Wind and Solar PV Developments in Devon's Landscape' will be made in the supporting text.

Total number of responses to CC-D4 Small-Scale Wind Turbines	4
Total number of responses in support	1
Total number of responses in support subject to amendment	2
Total number of responses in objection	0
Total number of responses providing a general comment	1

CC-D4: Summary of Responses

Support

- Support received from SCC who consider that the Exmoor Plan has provided good opportunity to stress the importance of protecting tranquillity.

Support subject to amendments

- NDC supported the policy approach subject to an amendment to delete the criterion restricting height of a small scale turbine to 20m which is not considered to be necessary given the remaining policy criteria.
- HE suggested better reference could be made in the policy in relation to the historic environment.

General Comments

- Porlock PC raised issues of noise impacts resulting from wind turbines and other activities within the National Park.

Officer Comments and Recommendations

- This is a development management policy, and therefore it is not considered necessary to specifically reference the historic environment as proposals will also be assessed against the strategic policy (Low Carbon and Renewable Energy Development) which includes specific reference to the historic environment.
- With regard to omitting the criterion relating to a maximum of 20m height to rotor tip of a wind turbine, it is felt that criterion (a) is essential to the policy as it has been extensively debated by Officers and Members.
- The policy and supporting text addresses the impacts of noise pollution and a further strategic policy for Pollution specifically has regard to noise pollution in general.

Agreed actions

None required

Total number of responses to CC-D5 Freestanding Solar Arrays	7
Total number of responses in support	7
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	0

CC-D5: Summary of Responses

Support

- Support received in relation to the policy and supporting text from the Environment Agency.
- Support also received from Historic England and Porlock PC.

Officer Comments and Recommendations

- Support for the policy, including from specific consultation bodies, is welcomed.

Agreed actions

None required.

RESOURCES

Total number of responses to CC-S4 Waste Management	14
Total number of responses in support	9
Total number of responses in support subject to amendment	0
Total number of responses in objection	2
Total number of responses providing a general comment	3

CC-S4: Summary of Responses

Support

- The majority of support received in relation to the policy and supporting text, was from the Environment Agency (EA).
- Devon County Council (DCC) supported the approach to waste management and stated that DCC's Waste Plan will make appropriate provision for managing waste arising within the National Park.
- Historic England also supported the policy.

Object

- Policy implies that the National Park Authority is the only decision-making body in respect of use of the Local Plan – wording needs rephrasing to make it more generic (WSC).
- Criterion 3 of this policy (which does not allow waste to be imported from surrounding communities) with regards to AD is unrealistic and unworkable – should be more flexibility to encourage a sustainable form of managing waste (The Crown Estate).

General Comments

- Concern raised by a local resident about the imminent closure of the Lyn Down local recycling point and the increase in fly-tipping.
- Concern that small-scale anaerobic digesters may not be viable.
- Text should also refer to Devon waste operators.

Officer Comments and Recommendations

- Support welcomed from DCC and the EA in relation to waste management and effective cooperation in relation to the cross boundary strategic issue of managing waste.
- In terms of the wording of the policy referring to the National Park Authority – this wording relates to working with the waste collection and disposal authorities to ensure the sustainable management of waste arising in the National Park. The wording of the policy is considered to be appropriate.
- In relation to the waste stream for small scale anaerobic digesters it is considered that the policy should be amended to provide for a mixed waste stream from within the National Park, or from parishes adjoining the National

Park for those farms located near the boundary where this is the most sustainable option.

- Policy CC-S4 allows for the development of community scale recycling facilities; however, the closure of existing facilities is beyond the remit of the planning system.
- In terms of the issue of viability, it is not appropriate to provide for large scale anaerobic digesters given the potential adverse impacts these are likely to have on the National Park.

Agreed actions

1. Amend policy to enable the sourcing of feedstock and waste from within the National Park and/or from parishes adjoining the National Park, for small scale anaerobic digesters on farms.
2. Wording of policy will be amended to refer to ‘partner organisations’ rather than identifying specific waste operators.

Total number of responses to CC-D6 Sewerage Capacity and Sewage Disposal	21
Total number of responses in support	20
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	1

CC-D6: Summary of Responses

Support

- The majority of supporting comments, relating to the policy and supporting text, were received from the Environment Agency (EA).
- Wessex Water supported robust provisions for sewerage infrastructure.
- Somerset County Council supports reference to pre-application technical advice within the supporting text to help minimise the impact of some development, and considered that the policy protects tranquillity.

General Comments

- Wessex Water provided confirmation that they can utilise development restraint zones around sewage treatment works to assist consultations.

Officer Comments and Recommendations

- Support from EA and Wessex Water in relation to the policy and supporting text, is welcomed.

Agreed actions

1. Reference to be made to 'development restraint zones' in the supporting text to the policy.

Total number of responses to CC-S5 Pollution	29
Total number of responses in support	28
Total number of responses in support subject to amendment	1
Total number of responses in objection	0
Total number of responses providing a general comment	0

CC-S5: Summary of Responses

Support

- Somerset County Council (SCC) – support received in relation to protecting the environment and tranquillity in considering the noise impact from development.
- The majority of supporting comments, in relation to the text and policy, were received from the EA.

Support subject to amendments

- SCC suggested that further explanation could be given in relation to noise impacts and the Noise Policy Statement of England 2010.

Officer Comments and Recommendations

- Support welcomed from the EA and SCC.
- In relation to noise pollution further definition relating to 'noise' as a material planning consideration will be provided and the supporting text to be strengthened by reference to planning obligations as a tool to help mitigate any potential noise to ensure that it does not erode the tranquillity of the area.

Agreed actions

1. Strengthen the supporting text in relation to minimising noise pollution to an acceptable level, providing a definition of noise, and cross referencing to general policy Securing Planning Benefits – Planning Obligations as a tool to mitigate potential noise impacts.

Section 7: Achieving A Thriving Community

Total number of responses to Section 7	127
Total number of responses in support	35
Total number of responses in support subject to amendment	14
Total number of responses in objection	41
Total number of responses providing a general comment	37

HOUSING

Total number of responses to HC-S1 Housing	58¹⁹
Total number of responses in support	6
Total number of responses in support subject to amendment	5
Total number of responses in objection	27
Total number of responses providing a general comment	20

HC-S1: Summary of Responses

Support

- Rural Housing Project supports the approach of providing for local needs affordable housing to help conserve the National Park landscape.
- The emphasis on affordable housing, including in small communities, and the prioritising of specialist housing for the vulnerable and for rural workers welcomed by Carhampton PC.
- Assistance for the provision of affordable housing welcomed.
- Support received from Dulverton Town Council regarding the flexibility to enable the delivery of affordable housing with some principal residence market housing.
- NDC supported the recognition of the Northern Peninsula SHMA 2008 and recent updates and that the strategic housing need for the North Devon area of the National Park will be met outside the National Park.
- NDC also supported the policy approach for the principal housing need being identified local housing needs with new housing of a size, type and tenure to meet the needs of Exmoor's communities.

Support subject to amendments

- ENPA should lobby for an increase in council tax for second home owners to support the construction of affordable housing.
- Agree with the need for affordable housing but funding for affordable housing should be provided by a government body rather than using profits from open market sales.
- Extended family dwellings are welcomed but should not have such an onerous binding mechanism that may prevent its delivery (WSC).

¹⁹ Includes three comments which address Section 7 as a whole

- West Somerset Affordable Housing Group supports the idea of Lifetime Homes but this would not be feasible with the need for smaller one-bed properties and the impact on viability and delivery.
- Whilst The Crown Estate accept that the provision of affordable homes should remain a priority, the policy does not take account of viability. The policy should address the issue of enabling the delivery of affordable homes through cross subsidy from a proportion of market housing.

Object

- The Woodland Trust would like to see more in this section in relation to planning for health and well-being with regard to the role that green infrastructure (especially trees and woods) can have in delivering positive health outcomes. Specific reference to be made in the supporting text.
- WSC objected to a number of statements within the text, raising the following points²⁰:
 - Wording of the text implies that the National Park, in the production of the Local Plan, is exempt from the provisions of the National Planning Policy Framework (NPPF) due to paragraph 14 and its footnote. The footnote referred to makes clear that it recognises the special status conferred on such places is used as an example only and relates to their application in the context of other policies contained within the NPPF. National Parks are only specifically referred to in policy terms within the NPPF in paragraph 115 in relation to the weight to be attributed to conserving landscape and scenic beauty and, paragraph 144 in relation to minerals planning applications. Whilst the former includes a reference footnote to the National Parks Circular of 2010 this makes clear that it is only in relation to, 'the statutory purposes, management and other matters' but no mention of planning. As the NPPF post-dates the Defra Circular, it forms the latest Government statement in respect of planning policy and all relevant parts, with the exception of those specifically referred to above, apply to all LPA's including National Parks.
 - The text suggests that the housing provision for the National Park contained in the former, emerging Regional Spatial Strategy (RSS) for the South West was in some way different from the requirements provided for other LPA's. The NPPF makes it clear that all local planning authorities are expected to have an up-to-date understanding of the housing markets that affect them and how this translates into a figure of objectively identified housing need, which they are expected to plan for.
 - The text acknowledges the differences in house-prices inside and outside of the National Park but does not provide an explanation as to why this is. It recognises that this discrepancy makes the prospects of being able to live in the National Park as less affordable than similar properties outside which impacts on open market rents and consequently 80% 'affordable rents' are

²⁰ Note some of these comments were entered a number of times as they related to more than one paragraph in the Draft Local Plan.

unaffordable to most local people. Text should reflect this more clearly and how the Plan seeks to address this issue.

- Use of the data is misleading in relation to the sale of affordable housing units within the National Park and the use of the monies by registered Providers on schemes outside of the National Park.
- The text seems to imply that through the Landscape Sensitivity Study that there is a finite capacity to the development of the settlements within the National Park and this is predicated on the assumption that the settlements themselves cannot expand. The justification for the non-expansion of the settlements is based on the arbitrary assumption that the landscape outside of these places is all of the same high sensitivity to development and should not, therefore, be considered. Whilst the National Park's special status is derived from a legal designation, this of itself does not mean that all of the landscape within the area is of equal quality and sensitivity. The development strategy of the draft Local Plan would appear to conflict with the National Park Circular which cites that their primary role should be performed in the context of; '...that they should ensure they are exemplars in achieving sustainable development, helping rural communities to thrive.' By restricting development in the settlements in the National Park in the way proposed, this will make it more likely that the residents will become more dependent on settlements outside of the National Park for essential day-to-day services and facilities, thus generating lifestyle patterns and movements that are contrary to the principles of sustainable development.
- The picture concerning how the National Park intends to deal with housing need (objectively assessed need [OAN]) across its Local Planning Authority area is confused and lacks a consistency of approach in relation to the OAN evidence for the West Somerset and North Devon areas of the National Park – with the absence of a clear figure for the North Devon area of the National Park. It is essential for LPA's to identify what OAN is likely to be so that it can be managed and planned for. The approach for the North Devon area (for the OAN for this area to be met outside the National Park) would mean more commuting and a less sustainable option.
- The need within the Somerset area of the National Park to be met, as and when it arises, would conflict with the purpose of development plans to plan and manage. Further reference was made to the absence of a 5 year land supply and the implication that the National Park Circular does not specifically refer to planning – the NPPF forms the latest Government statement in respect of planning policy.
- Concern was expressed regarding the 90sqm internal floorspace restriction for affordable needs housing as many local people are self-employed and require space to store tools/equipment - nor would it accommodate a growing family (Cutcombe PC).

- Concern is expressed that Registered Housing Providers will be allowed to 'exercise their own discretion' about the eligibility of occupants and that 'planning permission is unlikely to be required' should such housing providers purchase and create new housing units through subdivision (Cutcombe PC).

General Comments

- Concern raised that nothing that addresses the importance of small businesses and how they can add to the enjoyment of visitors.
- HBF stated that the Plan provided no housing requirement figure and highlighted that the updated SHMA Report for North Devon & Torrington 2012 did not identify housing needs within the National Park. HBF recommended that there should be an objective assessment of housing need and the inclusion of a housing requirement figure within a policy of the Local Plan should also be considered.
- WSC stated that as there is a choice-based lettings scheme that operates county wide, the terms such as 'waiting list' and 'register' are no longer appropriate.
- WSC stated that the Draft Local Plan did not contain any data on existing supply of social housing stock or re-lets. It was recommended that it would be useful to have this contextual information included as the re-let figures indicate that the majority of need could be met from the existing stock. The re-lets data was considered to also help to focus any future new build where it is most needed.
- WSC queried completions data and that the figures seemed to indicate that against the figures cited in the formerly emerging Regional Spatial Strategy 2006-2028 (20 dwellings per annum), ENPA was currently overproviding.
- WSC concerned that text relating to housing design will only encourage pastiche developments.
- WSC highlighted a growing need for smaller 1-bedroom accommodation and lack of existing supply to meet this need.
- West Somerset Affordable Housing Group would welcome the publication of the Exmoor National Park Housing Supplementary Planning Document.
- Reference should be provided for the proportion of self-employed people cited in the text.
- Comment on the average household income level being inappropriate for the Porlock area as many households will have a far lower income, and the affordable rents within Porlock are not affordable to those in housing need (Porlock PC).
- Concern raised that S106 agreements can harm future business development and provision of jobs which will impact on young people moving away in search of affordable homes. Also comment relating to the limit on the size of affordable homes and difficulty in obtaining finance for self-build (intermediate) affordable homes.
- Exmoor Uprising provided information relating to options for affordable wooden homes on affordable plots (possibly with temporary permission for housing), and raised the possibility of mobile or temporary prefabricated homes to address Exmoor's housing needs.

- Utilising existing buildings for affordable housing – using ENPA headquarters suggested.
- The Rural Housing Project stated that housing should be designed to high levels of sustainability and energy efficiency; being able to be adapted to the changing needs of the occupants.
- Porlock PC concerned that the size limit of affordable homes does not meet the social needs of a modern family structure.
- HBF stated that the 2008 viability assessment is out of date and recommend that an updated assessment is carried out to ensure the Plan is compliant with NPPF requirements.
- The expectation that all new affordable homes should be built to comply with Lifetime Homes standards was felt to be unnecessary and would be another burden to the delivery of affordable housing (South West HARP).

Officer Comments and Recommendations

Support

- Support welcomed from the Rural Housing Project and local town and parish councils.
- Support for the overarching housing strategy received from North Devon Council was particularly welcomed, underpinning the Duty to Cooperate.

Support subject to amendment

- Although the issue of the impact of second homes within the National Park is recognised, it is beyond the scope of the planning system to control council tax.
- The Local Plan policies seek to provide 100% affordable housing as a starting point; however, the level of public housing grant available for Registered Providers to build affordable housing is too low to allow house builders to build affordable housing without some other form of funding (e.g. cross subsidy from principal residence market homes).
- It is no longer considered appropriate to require Lifetime Homes standards for all new residential development. The policy approach to ensure a balanced housing stock in the National Park will meet the needs of Exmoor's communities and use flexible standards to enable dwellings to be adapted to the needs of people over their lifetime. More specific guidance relating to specialist homes for older and more vulnerable people will be set out in a forthcoming supplementary planning document for housing (also applies to a general comment made by South West HARP).
- In Exmoor National Park, housing policies for settlements in the draft Plan require affordable housing as a starting point but provide, because of current reductions in public housing grant, some flexibility for cross subsidy in specific circumstances, including for conversions and new build in identified Local Service Centres and Villages, where it is demonstrated that it is required to deliver needed affordable housing. In this way, the viability of sites will be tested on a case by case basis. For clarity this approach will be set out in policy HC-S1.

Object

- Green infrastructure including trees and woodlands are referred to in Section 5 Conserving and Enhancing Exmoor and specifically within CE-S3 Biodiversity and Green Infrastructure, where the benefits for health and well-being are particularly highlighted. Within the Achieving A Thriving Community Section, the benefits of green infrastructure for health and well-being are referred to in relation to the policy for Important Visual Amenity Land. It is considered that these benefits are appropriately referenced within the Plan.
- Available information on house prices will be reviewed including land registry data for sale values and recent SHMA Updates. The housing section of the Local Plan and Housing Topic Paper will be reviewed to ensure that key information such as the reasons for high house prices in the National Park are clear including statistics and analysis. Evidence shows that Exmoor's housing market is subject to high external demand as National Parks are desirable places to live - particularly by those moving into the area for retirement or to purchase a second home. The housing section will be reviewed to ensure that key information such as the reasons for high house prices in the National Park are clear. In relation to affordable (80% rents), the Plan states that the Authority will consider schemes on a case by case basis to assess whether potential rental levels are likely to be genuinely affordable to households in local housing need. Evidence of income and affordable rent levels indicates that to be truly affordable rent is likely to be lower and based on social rent levels.
- Draft Local Plan policies provide for affordable housing within Exmoor National Park through a rural exceptions approach where it will meet a local affordable need and, importantly, will be consistent with National Park purposes. This approach has been applied in the National Park since the adoption of the 2005 Local Plan with a good track record of affordable housing delivery in the National Park. A SHLAA Report will also provide evidence on suitable housing sites in the National Park.
- The supporting text relating to objectively assessed need (OAN) for housing will be reviewed and updated as a result of more recent evidence including Strategic Housing Market Assessment (SHMA) Updates and the Strategic Housing Land Availability Assessment (SHLAA) Report²¹ to inform the Local Plan and address the NPPF requirements in the context of the National Park's statutory purposes as set out in legislation. The Draft Local Plan set out housing need figures from the draft Exmoor in West Somerset SHMA Update²² since that was the most up to date information available at the time. Since then the SHMA Update has been finalised and further updates produced as a result of emerging evidence. The Publication Plan will reflect these updated reports.

²¹ Exmoor National Park Authority (2014) Exmoor National Park Authority Strategic Housing Land Availability Assessment Report

²² Housing Vision (2014) SHMA Update: Exmoor National Park in West Somerset

- The representation from WSC refers to the fact that for the North Devon part of the National Park, the draft Local Plan reflected housing need figures for the Exmoor and Downland Fringe from the Torridge and North Devon SHMA Update²³. This is correct as the North Devon area of the National Park was included in the SHMA update. Recent SHMA Update for Exmoor National Park²⁴ disaggregates a specific affordable housing figure from the Exmoor and Downland Fringe Sub-Area as well as providing an overview of the National Park as a whole drawing on previous SHMAs; resulting in a combined (discrete) figure for the affordable housing need for the National Park. The North Devon Local Plan proposes to help meet the strategic housing needs for the North Devon part of the National Park (outside the National Park boundary); in co-operating with the National Park Authority, North Devon Council recognises that opportunities to deliver open market and affordable housing within the National Park are limited due to the National Park designation. However, the Authority will still aim to provide for identified local affordable housing need within the North Devon area of the National Park where landscape capacity and suitable housing sites exist.
- The NPPF sets out policy relevant to the work of all planning authorities. Its content must be balanced against the content of other relevant policy and legislation including the purposes of National Parks and duties of relevant bodies set out in the Environment Act 1995 (sections 61 and 62) which in themselves provide the context for interpreting policy. The NPPF (paragraph 47) in referring to meeting housing requirements uses the term “should”; this provides an opportunity for a balanced consideration. It also refers to meeting an objectively assessed figure for housing ‘as far as is consistent with the policies set out in this Framework’ (see below).
- The NPPF states that the OAN for housing should be met unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole, or where specific policies indicate development should be restricted; this includes National Parks. National Parks do not have the capacity to accommodate the full OAN without seriously harming National Park purposes. Adjustments to the provision of identified needs therefore must be made so that the level and type of housing development is sustainable and appropriate to the protection and status of the designation. The NPPF is clear that National Parks are protected areas and that their statutory purposes (landscape, scenic beauty, wildlife conservation and cultural heritage) should be given great weight.
- The supporting text to policy HC-S1 and a Housing Topic Paper underpinning the strategy for the delivery of housing in the National Park will clearly explain how Government guidance for National Parks including the NPPF and the National

²³ Housing Vision (2012) SHMA Update: North Devon and Torridge

²⁴ Housing Vision (2015): SHMA Update – Exmoor National Park

Parks Circular is being applied within a National Park context through the Local Plan strategy for housing and Plan policies.

- The English National Parks and the Broads Vision and Circular still forms part of the guidance for National Parks. It has been reviewed and has not been cancelled. The NPPF refers to the Circular which sets out the 2030 vision for National Parks to guide “their long-term planning and strategic decision-making”. Furthermore it specifically refers to planning and management of the National Park areas and the key role the Authorities have as planning authorities in protecting the National Park and fulfilling its socio-economic duty. It also highlights the local need for affordable housing as part of sustainable local rural communities and economies; recognising that National Parks are not suitable locations for unrestricted housing and general housing targets are not provided. The Circular states that National Park Authorities should include policies that pro-actively respond to local housing needs.
- In response to the comment relating to the 90sqm floorspace for affordable homes (and general comment stating that the size of affordable homes in unrealistic), the policies provide for affordable homes to meet local affordable needs and in the case of housing controlled by Registered Providers, floor space can be greater than 90sqm depending on the need identified. It is essential that for owner occupied affordable dwellings that size is controlled in order to ensure they remain affordable in perpetuity. However, the policies provide for ancillary buildings for storage and home-based businesses.
- The point raised about planning permission not being required is only in relation to Registered Providers purchasing existing homes on the open market to add to their stock of affordable homes; these homes would then be subject to the choice based letting that operates on a county-wide basis. Some Registered Providers also apply a ‘local preference’ when letting their existing stock (with no local occupancy legal agreement) within the National Park. Planning permission would be required if new homes were to be created through the sub-division of existing properties.

General Comments

- Where there is an identified need for one bedroom accommodation, policies would enable this. The Authority will consider schemes on a case by case basis to assess whether potential rental levels are likely to be genuinely affordable to households in local housing need.
- The draft South West Regional Spatial Strategy (RSS)²⁵ did not contain a housing requirement, but accepted that in the region’s National Parks, there should be an estimated provision against local needs only. By setting out an ‘estimate’ of provision, the Plan approach for National Parks was different from that of other areas because it was an estimate of need and not a target and enshrined a needs

²⁵ South West Regional Assembly (2006) Draft Regional Spatial Strategy for the South West 2006-2026 - SWRA, Taunton

led approach to ensure that housing would only be provided where a need was demonstrated.

- In relation to the comment regarding the sale of affordable housing units within the National Park, no evidence was provided to suggest that there was no identified on-going need for the specific properties identified for sale, since it would appear that they were not advertised as being available before the decision was taken to sell the specific units.
- Paragraph relating to housing design will be reviewed to avoid repetition of the 'Design and Sustainable Construction Principles' policy and text. It is important that all development, including housing development, contributes to the conservation and enhancement of the National Park consistent with statutory purposes. The NPPF states that it is proper to seek to promote or reinforce local distinctiveness and character.
- Comments received from Exmoor Uprising regarding the provision of affordable homes are consistent with Local Plan policies that seek to provide for local affordable housing in the National Park where there is a proven need. The cost of new housing relates to factors including materials, provision of services, and land value. In the National Park, policies are based on a rural exceptions approach which has kept land values in reach of local householders. Affordable homes that are owner occupied are kept more affordable than open market equivalents by a local needs tie, and ensuring that their size does not exceed 90sqm floorspace. Policies encourage energy efficiency and locally sourced sustainable materials; a number of timber self build houses have been constructed in the National Park and policies would enable, in principle, timber to be used for housing where the location, siting and design accord with other policies in the Plan and are otherwise in keeping with the National Park.
- Temporary homes are only provided in appropriate circumstances for example for workers of rural land based businesses. It is not felt that these suggested temporary uses are appropriate for rural housing needs where a more permanent solution is required. Opportunities for self-build affordable homes in small rural communities is included in the Plan.
- Policies allow for the conversion and change of use of redundant buildings in the National Park. Any land or buildings used for business would be safeguarded for that use unless it can be demonstrated that the business use is no longer viable.
- In relation to sustainability and energy efficiency of new homes, this is addressed in the policy relating to Design and Sustainable Construction Principles.
- Currently, the level of public housing grant available for registered providers to build affordable housing is too low to allow house builders to build affordable housing without some other form of funding such as cross subsidy from principal residence market housing.
- With regard to the comment made by HBF regarding an up to date viability assessment to satisfy the requirements of the NPPF, paragraph 54 of the NPPF says that 'in rural areas... planning authorities should be responsive to local

circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate'. Local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs. In Exmoor National Park, housing policies for settlements in the draft Local Plan require affordable housing as a starting point but provide some flexibility as set out in the NPPF for cross subsidy in settlements where it can be robustly demonstrated and NPA considers that it is required to deliver needed affordable housing. In this way, the viability of sites will be tested on a case by case basis.

Agreed actions

1. Update house price information and analysis arising from annual Exmoor National Park House Price Surveys and recent SHMA Updates.
2. Include a clause setting out the approach for principal residence market housing only where it is essential to deliver an identified need for local need affordable housing.
3. Reference to the proportion of self-employed economically active people in the National Park will be updated in relation to the 2011 Census.
4. Utilise new evidence to support the OAN for the National Park, including updated SHMA Reports taking account of 2012-based sub-national population projections, and a separate report addressing housing needs within Exmoor National Park (both North Devon and West Somerset element to provide a discrete OAN figure for the National Park), and the SHLAA Report. This evidence will inform the following:
 - a. The underlying strategy for policy HC-S1 Housing
 - b. Housing Topic Paper
 - c. Duty to Cooperate Statement
5. Terminology in this section will be reviewed to ensure it is consistent with that used by housing authorities.
6. Remove text relating to housing design – cross reference to Design and Sustainable Construction Principles policy.

Total number of responses to HC-S2 Housing Conservation and Enhancement	2
Total number of responses in support	2
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	0

HC-S2: Summary of Responses

Support

- Support received from The Crown Estate in relation to the approach of supporting conversion of listed buildings and buildings of locally significant historic or architectural interest for residential use.
- Historic England support the policy approach.

Officer Comments and Recommendations

- Support welcomed.

Agreed actions

None required.

Total number of responses to HC-S3 Local Occupancy Criteria	10
Total number of responses in support	1
Total number of responses in support subject to amendment	2
Total number of responses in objection	4
Total number of responses providing a general comment	3

HC-S3: Summary of Responses

Support

- Support for the local occupancy criteria was received from the Exmoor Society.

Support subject to amendments

- Support for a subsequent cascade for a 5 year local connection for re-lets was welcomed by WSC (on behalf of the West Somerset Affordable Housing Group); however, a suggestion was made to word the clause as 'where properties are vacant' to introduce greater flexibility if difficulties arise on a first let.
- The Crown Estate comment the approach adopted by the Authority by introducing some flexibility but have reservations if there are no local people satisfying the criteria. Recommend that the policy is monitored for its effectiveness.

Object

- Cutcombe PC raised concern regarding the inflexibility of the local occupancy criteria and the minimum period of 10 years permanent and continuous residency in the parish – would like to see some leeway on this with regard to key workers.
- WSC raised the following objections:
 - Consider that unreasonable demands are placed on the applicant by insisting that they use named organisations for a local housing need survey to support their proposal – suggest a model questionnaire is drafted that applicants could use.

- Supporting text expects that land/property owners will be willing to agree to have assets considered in this way; in relation to finding suitable housing or existing buildings that may be available locally before applying for a new dwelling.
- Supporting text suggests that the Authority is attempting to behave like a local housing authority which is not its function; in relation to assessment of need and applicant's income and savings.

General Comments

- Text appears to be missing from the start of this paragraph which makes it difficult to comprehend or put in context (WSC).
- Exmoor Uprising commented that Parish Councils should be able to determine who occupies new local need affordable homes.
- Clarification is required as to whether the reference to 'adjoining parish' includes adjoining parishes outside the Exmoor National Park boundary (WSC).

Officer Comments and Recommendations

- Support welcomed from the Exmoor Society,
- In relation to the comment regarding the cascade to a 5 year local connection for vacant dwellings, it is considered that the suggested amendment is acceptable to ensure that vacant affordable properties can be let.
- The policy includes clauses which set out the final cascade for affordable homes managed by Registered Providers and owner-occupied affordable homes. The policy will be monitored through the Annual Monitoring Report which monitors the implementation of policies to ensure that they are having the intended effect.
- The objection in relation to the 10 year local connection is considered to be unfounded as the wording of the proposed policy is the same as the Local Plan 2001-2011 policy. There is additional flexibility in that for a 10 year connection within the National Park as a whole. Those Exmoor workers who meet the requirement for affordable housing will be also eligible for occupancy and this does not require a 10 year local connection - further guidance on Exmoor workers will be provided in a future supplementary planning document
- The intention of the paragraph highlighted by WSC regarding individuals or groups to examine the availability of properties and existing buildings in their own or adjoining parishes before new affordable housing is considered, is correct, this approach is in line with the spatial strategy to consider brownfield sites before greenfield.
- It is not the intention to obtain information from the local housing authority in relation to individual incomes, but only to assess their ability to afford existing housing. The paragraph will be clarified to avoid any unnecessary confusion.
- In relation to the comment raised by Exmoor Uprising, the choice based letting system is a legal requirement for homes let through registered providers and is therefore outside of local planning control; including Parish Councils.

- Clarification regarding the term ‘adjoining parishes’ is set out in the supporting text.

Agreed actions

1. A minor wording change to the policy will be made to state “properties are vacant” in accordance with West Somerset Affordable Housing Group suggested amendment.
2. Supporting text will be amended in relation to missing text.
3. Supporting text will be reviewed to clarify the approach to assessing affordable housing need.

Total number of responses to HC-S4 Financial Contributions for Affordable Housing	0
Total number of responses in support	0
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	0

HC-S4: Summary of Responses

No comments received.

Officer Comments and Recommendations

None required.

Agreed actions

None required.

Total number of responses to HC-S5 Principal Residence Housing	12
Total number of responses in support	5
Total number of responses in support subject to amendment	3
Total number of responses in objection	2
Total number of responses providing a general comment	2

HC-S5: Summary of Responses

Support

- The Rural Housing Project supported the policy approach in allowing principal residence market housing only where this is needed to facilitate that affordable housing as a practical mechanism for aiding delivery of small housing schemes.
- Support also received from Exmoor Society, NDC and The Crown Estate for the policy approach for principal residence housing to enable the delivery of affordable housing.

- Support for principal residence housing to enable local affordable homes in the main settlements – such as Dulverton.

Support subject to amendments

- Clarification is needed as to who, the National Park Authority envisages, will deliver these 'principal residence' market dwellings - it is likely that this type of housing will be delivered by private developers rather than Registered Providers. (WSC on behalf of the West Somerset Affordable Housing Group).
- The opportunity to provide a small amount of market housing provides a welcome source of cross subsidy which can ensure viability of a development. South West HARP do not see why the Authority should not be more overt about its intention and refer explicitly to cross-subsidy in the policy text.

Object

- Provision should be made for a local person who is not in housing need but wants to improve their situation and is in the position to build a house within the local service centres/villages as their principal residence, without having to provide affordable housing.
- Unclear as to how 'Principal Residence Housing' will be monitored and enforced, especially when a property is sold on (WSC).
- Negatively worded policy. If it is to be proceeded with suggest; 'Open market housing will only be permitted where it can demonstrate it is essential in order to enable the delivery of... (WSC).

General Comments

- The provision for affordable housing should have a certain amount of flexibility because the amount of land/buildings suitable for development is limited. So in two different service centres/villages have a principal residence in one and affordable housing in another. To encourage the use of renewable energy. A provision should be included for a passive house as a principal residence for a local with no ties attached.
- The policy should be broadened to allow people with a proven local connection to the National Park to build a house for their own use despite not needing 'affordable' housing. Somebody building a house for their own use will not necessarily want the affordable housing right next door or demand for the affordable housing may not be in that locality.

Officer Comments and Recommendations

- Support for the principal residence housing policy was welcomed.
- It is agreed that this type of housing (principal residence) may be delivered by private developers who may also be Registered Providers, or that private developers build the dwellings, the affordable element of which are subsequently owned or managed by a Registered Provider.
- It is considered that the term 'cross subsidy' will be used in the supporting text to policies HC-D1 Conversions to Dwellings in Settlements and HC-D2 New Build Dwellings in Settlements.

- New build housing should not come forward unless there is a proven local affordable need for it. Evidence shows in Exmoor National Park that suitable land for housing is in short supply and the principal need of local communities is for local affordable housing. In providing for affordable housing, there is some flexibility for the provision of principal residence housing where required to deliver the affordable housing. Account needs to be taken of the existing housing stock the great majority of which, can be lived in by anyone who is not in affordable need.
- It is recognised that there are monitoring implications for this policy. Any occupancy restrictions will be recorded on a local property search for future purchasers to consider.
- The supporting text to policy HC-S1 (and the policy) and will clarify the statement that *‘open market housing will not be permitted’* and it will be removed from the Principal Residence Housing policy.
- Policy HC-D2 New Build Dwellings in Settlements defines the approach that principal residence housing and affordable housing will be integrated on the same site as this gives greater certainty to delivering the affordable housing where the need is identified.
- New build housing should not come forward unless there is a proven local affordable need for it.

Agreed actions

1. Phrase ‘open market housing will not be permitted’ will be removed from the policy.
2. Use the term ‘cross subsidy’ in the supporting text to HC-D1 and HC-D2 to be explicit about where this will apply.

Total number of responses to HC-D1 Conversions to Dwellings in Settlements	4
Total number of responses in support	0
Total number of responses in support subject to amendment	0
Total number of responses in objection	2
Total number of responses providing a general comment	2

HC-D1: Summary of Responses

Object

- Text talks of a housing capacity of the settlements but the source is not identified. The Proposals Map and settlement inset maps do not show any form of development limits or identify specific sites for development. It is assumed that the 333 new-build housing figure derives from the Landscape Sensitivity Study and concern is raised how has been applied. The text in the paragraph suggests that the application of the sensitivity testing has been applied to all the

named settlements in the plan whilst the methodology itself reveals that only the 22 named locations in the adopted Local Plan were assessed (WSC).

- Policy makes reference to extant legislation and could conflict with the provisions in the Development Management Procedure Order (WSC).

General Comments

- There is a need to make consistently clear throughout this Local Plan that the 'capacity' for development identified in the Landscape Sensitivity Study is 'landscape capacity' only, as the study itself makes explicit (Old Cleeve PC).
- All applications must be examined on a case by case basis with consideration of local need and not simply be required to meet all clauses without consideration. These are policies not laws (Winsford PC).

Officer Comments and Recommendations

- The Landscape Sensitivity Study will be referenced accordingly²⁶. The Landscape Sensitivity Study builds on the Exmoor National Park Landscape Character Assessment 2007 to assess the sensitivity of the landscape within and adjoining the 22 named settlements in the Local Plan 2001 – 2011. Part of the evidence needed for the Local Plan is an assessment of the landscape sensitivity of settlements that informs their capacity to accommodate small-scale housing development on greenfield sites within or adjoining the existing settlements, while conserving and enhancing the National Park's nationally important landscape. The proposed approach in the emerging Local Plan is to have no development boundaries as the delivery of housing is based on a rural exception site approach in the Local Service Centres and Villages across the National Park.
- The term capacity will be preceded by the term 'landscape' to ensure clarity in relation to the Landscape Sensitivity Study.
- All planning applications are considered on a case by case basis to assess whether they are in accordance with policies in the Development Plan (i.e. the Local Plan).

Agreed actions

1. Ensure the Landscape Sensitivity Study is referenced accordingly.
2. Ensure the term 'capacity' is preceded by 'landscape'.
3. Check reference to legislation and relocate to supporting text.

Total number of responses to HC-D2 New Build Dwellings in Settlements	8
Total number of responses in support	2
Total number of responses in support subject to amendment	1
Total number of responses in objection	2
Total number of responses providing a general comment	3

²⁶ Bryan, P. (2013) Exmoor National Park Landscape Sensitivity Study – *Exmoor National Park Authority, Dulverton*

HC-D2: Summary of Responses

Support

- Support local needs affordable housing and allowing some open market housing in the main settlements such as Dulverton.
- The Crown Estate welcome the policy approach that provides for all new market residential development will be expected to contribute towards the provision of affordable housing.

Support subject to amendments

- South West HARP were supportive of the policy but would reiterate the same point as above, that the term cross subsidy is more common place and should be used in this instance.

Object

- This Plan continues the approach in settlements of seeking all new build housing to be affordable housing to meet local needs. Concern is expressed that this policy means that a successful person cannot aspire to build his own house with the ENPA's boundaries (Cutcombe PC).
- Middle income families, be they from the area or new to Exmoor, are important for the long term economic and social health of the community. I think the balance should be actively redressed.

General Comments

- There is a concern by the West Somerset Affordable Housing Group that the policy approach will encourage schemes being contrived on a 51%-49% basis in relation to cross subsidy (WSC).
- The concept of affordable housing is fully supported but additional market housing should be encouraged within the National Park (Winsford PC).
- Concern that there are no opportunities for existing residents to be able to downsize from their existing property.

Officer Comments and Recommendations

- In preparing the Local Plan housing policies, account has been taken of the whole existing housing stock, the great majority of which can be lived in by anyone. In providing for affordable housing, some additional flexibility is proposed to enable principal residence housing in order to fund the delivery of affordable homes in Local Service Centres and Villages through conversions and new build. The Plan also includes a policy for specialist housing (for older or more vulnerable people) which would not require an affordable occupancy requirement but instead has a local tie as part of a larger needs led affordable scheme. Both 'principal residence' housing and 'specialist housing' enable the provision of new homes that can be lived in by those who are not in affordable housing need, including existing residents who need to downsize.
- In terms of housing for middle income families, evidence shows that even those with average household incomes living in the National Park are unable to afford

mean average house prices on Exmoor; therefore affordable housing (which may include intermediate forms of affordable housing such as shared-ownership or self-build affordable homes) is now needed by middle income families and the Local Plan provides for this. Principal residence housing to enable the delivery of affordable homes, is available to anyone to buy as long it is their principal home.

Agreed actions

1. Use the term 'cross subsidy' in the supporting text to be clear about the approach to delivering affordable homes where there are no other means of funding.

Total number of responses to HC-D3 Specialist Housing for Exmoor's Communities	1
Total number of responses in support	0
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	1

HC-D3: Summary of Responses

General Comments

- West Somerset Affordable Housing Group raised a number of queries in relation to the following points: how will 'an identified need for specialist housing' be assessed? What is the definition of 'Specialist Housing' in terms of this policy? Regarding affordable housing owned by Registered Providers, there is already a supply of Specialised Extra Care Housing and Sheltered Housing across the National Park, some of which is currently being de-commissioned due to a lack of need. Such accommodation also requires revenue funding in order to maintain the service; therefore the existing supply situation should be fully taken into account. Policy HC-D3 should acknowledge, that Specialist Housing may be required also by young people who require support to develop life skills to enable them to live independently.

Officer Comments and Recommendations

- The issues raised will be clarified in a future Housing supplementary planning document (SPD). In addition, the Strategic Housing Market Assessment (SHMA) Update has some additional evidence specific to specialist housing needs which will be incorporated in the Plan.
- Specialist housing is allowed for more vulnerable members of the community who require support and assistance, but will not necessarily be able to access extra-care and sheltered housing owned by Registered Providers. This again will be clarified in the Housing SPD.

Agreed actions

1. Include reference to the SHMA findings for specialised housing in the supporting text.

Total number of responses to HC-D4 Conversions to Dwellings in the Open Countryside	5
Total number of responses in support	2
Total number of responses in support subject to amendment	1
Total number of responses in objection	2
Total number of responses providing a general comment	0

HC-D4: Summary of Responses

Support

- Support received from Historic England in relation to the supporting text and policy criterion.

Support subject to amendments

- The Crown Estate (TCE) supports the policy approach for conversions to dwellings on farms to meet the needs of rural workers, extended families and those in affordable housing need. However, TCE feel that the policy is over-restrictive given that the NPPF (para 55) new housing in the countryside could be located where the development 'would re-use redundant or disused buildings and lead to an enhancement to the immediate setting'. TCE feels that there should be a criterion within the policy which allows for development along these lines and which would be in accordance with national policy.

Object

- Two objections were received from Somerset County Council (SCC) regarding the supporting text and policy. SCC does not support encouraging new residential in the countryside in isolation (i.e. without a business use or community service). This creates an unsustainable situation and is likely to increase the need for vehicular trips.

Officer Comments and Recommendations

- The NPPF sets out policy relevant to the work of all local planning authorities. Its content must be balanced against the content of other relevant policy and legislation. In the National Park's case the purposes of National Parks and duties of relevant bodies set out in the Environment Act 1995 (sections 61 and 62) carry great weight and in themselves provide the context for interpreting policy. Because of the overriding constraints within National Parks recognised in the NPPF, the limited opportunities for housing development should focus on the delivery of housing to address local and affordable housing needs. This is recognised in the National Parks Circular (para 76) as a critical link to the provision of support for business development in National Parks.²⁷

²⁷ DEFRA (2010) English National Parks and The Broads – UK Government Vision and Circular 2010

- Housing provided through the conversion of existing buildings in isolated locations is likely to harm rather than enhance the natural beauty of the National Park because the alterations required to ensure a building is suitable for a residential use, the ancillary activities associated with a conversion and other requirements such as the provision of mains electricity and the need for a curtilage are likely to have a harmful effect on the character of the buildings, its setting and the wider landscape.
- Policy HC-D4 applies to conversions to dwellings in the open countryside. For rural worker accommodation, it is intended this would avoid the need for new dwellings in the countryside for a rural worker associated with a rural land-based business. Where it relates to local need accommodation, the building must be located in a hamlet or farmstead where there is an existing dwelling. This is to ensure there is existing service provision, including refuse collection. As it is for a local need, in many cases, the person may be residing in the existing dwelling and there would be no additional travel movements generated.

Agreed actions

None required.

Total number of responses to HC-D5 New Dwellings in the Open Countryside	0
Total number of responses in support	0
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	0

HC-D5: Summary of Responses

No responses received.

Officer Comments and Recommendations

None required.

Agreed actions

None required.

Total number of responses to HC-D6 Rural Workers	2
Total number of responses in support	2
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	0

HC-D6: Summary of Responses

Support

- Support received from National Farmers Union and Historic England.

Officer Comments and Recommendations

- Support welcomed.

Agreed actions

None required.

Total number of responses to HC-D7 Succession Farm Dwellings – Second Dwellings on Established Farms	4
Total number of responses in support	3
Total number of responses in support subject to amendment	1
Total number of responses in objection	0
Total number of responses providing a general comment	0

HC-D7: Summary of Responses

Support

- Support received from the Rural Housing Project, Exmoor Trust and Historic England.

Support subject to amendments

- The Crown Estate were supportive of the policy approach but feel that it is unlikely to be financially unviable without some form of cross subsidy from conversions of other buildings on the farmstead to market dwellings.

Officer Comments and Recommendations

- The tests for a succession farm dwelling are similar to those of a rural land based worker, in that they require a proven functional need for the dwelling. It would therefore be inappropriate to allow an open market dwelling to fund the succession farm dwelling. This policy provides additional flexibility to current policy.

Agreed actions

None required.

Total number of responses to HC-D8 Extended Family Dwellings Criteria	4
Total number of responses in support	2
Total number of responses in support subject to amendment	1
Total number of responses in objection	0
Total number of responses providing a general comment	1

HC-D8: Summary of Responses

Support

- Support received included comments from Historic England regarding criteria b and e.

Support subject to amendments

- The policy approach was supported by West Somerset Affordable Housing Group but stated that any binding mechanism should not be so onerous as to prevent delivery.

General Comments

- Exmoor Uprising noted that one bed bungalows for retirees should be considered or mobile homes.

Officer Comments and Recommendations

- A planning obligation would need to be in place to ensure the occupancy of the dwelling is consistent with the policy requirements. However, the Plan does provide flexibility in allowing the occupancy to change to meet local affordable need or as a self-catering let where the policy requirements are met. This should help to ensure that this type of dwelling does not become redundant/vacant.
- It is not considered that specialist housing for older people or extended family dwellings could realistically and satisfactorily be provided through mobile homes. The policy approach for extended family dwellings is provision through the conversion of existing buildings within the residential curtilage or well-related to the farmstead grouping.

Agreed actions

None required.

Total number of responses to HC-D9 Residential Caravans	0
Total number of responses in support	0
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	0

HC-D9: Summary of Responses

No responses received.

Officer Comments and Recommendations

None required.

Agreed actions

None required

Total number of responses to HC-D10 Replacement of Rural Workers Occupancy Conditions	0
Total number of responses in support	0
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	0

HC-D10: Summary of Responses

No responses received.

Officer Comments and Recommendations

None required.

Agreed actions

None required

Total number of responses to HC-D11 Replacement of Holiday Occupancy Conditions and Extended Family Occupancy Ties	1
Total number of responses in support	1
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	0

HC-D11: Summary of Responses

Support

- Support received from Historic England.

Officer Comments and Recommendations

- Support welcomed.

Agreed actions

None required.

Total number of responses to HC-D12 Subdivision of Existing Dwellings	1
Total number of responses in support	1
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	0

HC-D12: Summary of Responses

Support

- Support received from Historic England.

Officer Comments and Recommendations

- Support welcomed.

Agreed actions

None required.

Total number of responses to HC-D13 Residential Extensions	1
Total number of responses in support	1
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	0

HC-D13: Summary of Responses

Support

- Support received from Historic England.

Officer Comments and Recommendations

- Support welcomed.

Agreed actions

None required.

Total number of responses to HC-D14 Outbuildings	1
Total number of responses in support	1
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	0

HC-D13: Summary of Responses

Support

- Support received from Historic England.

Officer Comments and Recommendations

- Support welcomed.

Agreed actions

None required.

Total number of responses to HC-D15 Replacement Dwellings	2
Total number of responses in support	1
Total number of responses in support subject to amendment	0
Total number of responses in objection	1
Total number of responses providing a general comment	0

HC-D15: Summary of Responses

Support

- Support received from Historic England.

Object

- An objection received strongly agreed with the attempt in this policy and others to realise more 'affordable' homes on Exmoor, however this policy attempts to achieve this by ensuring that the size of any replacement dwelling is not 'materially' or 'substantially' larger in terms of net floor area than the building it replaces. The draft wording of the policy may have a detrimental effect on the replacement of dwellings and the supply of housing (affordable or otherwise) over the coming years as smaller post-war timber frame properties (often in large curtilages) may not be replaced. Suggested amendments included allowing smaller properties to be replaced with the same net area but with permitted development rights to extend. Larger properties (90 – 160 sqm floorspace) to be replaced with a net floorspace of 117sqm (90sqm + 30% extension) or the net floorspace of the dwelling – whichever is the larger. Also to give incentives for larger replacement dwellings that meet certain energy efficiency standards.

Officer Comments and Recommendations

- The aim of the policy is not to achieve 'affordable' housing²⁸ through enabling the replacement of poorly constructed dwellings that have an adverse impact on the local area, but to ensure that smaller dwellings that are likely to be 'more affordable' are not replaced by larger, more expensive dwellings. This helps to ensure a balanced housing stock across the National Park.
- It is considered that in terms of the replacement of small dwellings (<90 sqm floorspace) the policy will be amended to ensure that replacement dwellings are no larger in size than the original dwelling or 90sqm internal floorspace (whichever is the larger). This approach, in relation to the replacement of smaller dwellings, will help to ensure a stock of smaller more affordable open market dwellings is retained across the National Park. The occupancy of these dwellings is not restricted in any way, but potentially provides a means for those living and/or working locally to afford to buy smaller units of open market housing if they have the means to do so. Permitted development rights will only be removed for those smaller dwellings up to 90sqm.
- The policy relating to Design and Sustainable Construction Principles sets out the key tests for new build development. Proposals should therefore demonstrate the integration of passive design and sustainable construction methods to improve or generate energy efficiencies. This policy is referenced in the policy for

²⁸ The term 'affordable housing' is defined in the National Planning Policy Framework as "Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision"

Replacement Dwellings. Higher standards of energy efficiency will also be met through improved Building Regulations coming into force in 2016.

Agreed actions

1. Amend policy to state “be no larger in size than the original dwelling or 90 square metres net internal floorspace, whichever is the larger.”
2. Amend policy to only remove permitted development rights in respect of extensions on dwellings of less than 90 square metres to ensure they do not exceed this size.

Total number of responses to HC-S6 Travelling Communities	1
Total number of responses in support	0
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	1

HC-S6: Summary of Responses

General Comments

- Exmoor Uprising stated that travellers are given priority and special sites which should also be applied to working people on Exmoor.

Officer Comments and Recommendations

- The policy has been drafted in accordance with national planning guidance. Recent evidence shows that there is no pitch requirement for gypsy and traveller accommodation in the National Park.

Agreed actions

None required.

COMMUNITY SERVICES AND FACILITIES

Total number of responses to HC-S7 Local Commercial Services and Community Facilities	4
Total number of responses in support	2
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	2

HC-S7: Summary of Responses

Support

- Support received for the policy included Nettlecombe PC.

General Comments

- Sport England noted that the importance of sport should be recognised as a key component of development plans, and not considered in isolation. Existing facilities should be protected and enhanced and new provision to meet demand.
- Winsford PC requested that the green area surrounding the car park in the middle of the village, which includes the tree planted in 2012 for The Diamond Jubilee was included as local green space.

Officer Comments and Recommendations

- The Open Space Strategy for Exmoor National Park provides an assessment of existing open space provision including sports facilities. The aim of the policy is to seek to protect and enhance existing community facilities (including recreation space) and encourage provision of new facilities in appropriate locations.
- The area identified by Winsford PC is already allocated as 'Important Visual Amenity Space' and has policy safeguards to ensure development will not cause harm or detriment to these areas. The Policies inset map for Winsford will be reviewed to ensure the whole area around the car park is included.

Agreed actions

1. Ensure the Policies Inset Map for Winsford includes the entire green area around the car park as Important Visual Amenity Space.

Total number of responses to HC-D16 Local Commercial Service Provision	1
Total number of responses in support	1
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	0

HC-D16: Summary of Responses

Support

- Support received from Nettlecombe PC.

Officer Comments and Recommendations

- Support welcomed.

Agreed actions

None required.

Total number of responses to HC-D17 Safeguarding Local Services and Community Facilities	2
Total number of responses in support	0
Total number of responses in support subject to amendment	1
Total number of responses in objection	0
Total number of responses providing a general comment	1

HC-D17: Summary of Responses

Support subject to amendments

- Sport England stated that they will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of, all or any part of a playing field, or land last used as a playing field. A suggested amendment to the Local Plan was that it should reflect the National Planning Policy Framework (NPPF) regarding protecting sport facilities for indoor and outdoor sport.

General Comments

- The benefits of local libraries were identified as important community facilities.

Officer Comments and Recommendations

- The supporting text preceding the strategic policy reflects the NPPF and seeks to protect sport and recreation facilities (as community facilities) in line with government guidance. This is then stated in the strategic policy for Local Commercial Services and Community Facilities and the criteria for safeguarding such facilities are included within policy HC-D17. An Open Space Strategy will be produced to inform this section.

Agreed actions

1. Publish the Exmoor National Park Open Space Strategy as evidence to underpin this section of the Plan.

Total number of responses to HC-D18 Important Visual Amenity Space	2
Total number of responses in support	1
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	1

HC-D19: Summary of Responses

Support

- Support received from Historic England.

General Comments

- Winsford PC were concerned that some of the areas identified are privately owned and some are untidy or overgrown.

Officer Comments and Recommendations

- Many areas designated as Important Visual Amenity Space are in private ownership and policy HC-D18 seeks to protect them from development that would cause harm to the visual amenity of the area.

Agreed actions

None required.

Total number of responses to HC-S8 Residential Institutions	1
Total number of responses in support	1
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	0

HC-S8: Summary of Responses

Support

- Support received from Somerset County Council in relation to the opportunity of stressing the importance of tranquillity.

Officer Comments and Recommendations

- Support welcomed.

Agreed actions

None required.

Section 8: Achieving a Sustainable Economy

Total number of responses to Section 8	37
Total number of responses in support	14
Total number of responses in support subject to amendment	4
Total number of responses in objection	3
Total number of responses providing a general comment	16

A SUSTAINABLE ECONOMY

Total number of responses to SE-S1 A Sustainable Exmoor Economy	19²⁹
Total number of responses in support	6
Total number of responses in support subject to amendment	1
Total number of responses in objection	0
Total number of responses providing a general comment	12

SE-S1: Summary of Responses

Support

- Three comments supported the section Achieving a Sustainable Economy as a whole including Historic England who stated that they support the reuse and alteration of traditional buildings in this context.
- Support for the policy received from Historic England and North Devon Council.
- Another comment supported the policy approach but questioned why the rebuilding of railways was not included.

Support subject to amendments

- Local Plan objectives 1 and 5 were considered to predicate against economic development and should be moderated so as not to be used as an overwhelming reason against economic development.

General Comments

- Cutcombe PC were concerned at the very short section on agriculture considering the importance of farming within the National Park.
- Cutcombe PC also noted the difficulty the Authority may face to implement the policies outlined in this section.
- A comment stated the difficulty in applying planning obligations to permissions that can make business development unviable impacting on local jobs and such a situation would lead to more young people moving away to find employment and affordable housing. The issue of limiting the size of affordable housing and the local occupancy tie was also raised in relation to obtaining mortgages.
- Somerset Rural Youth Project stated that transport initiatives should be supported to allow people to work locally.
- WSC stated the following:

²⁹ Includes reference to comments made in relation to the section as a whole.

- that further contextual information was needed relating to lower than average earnings, the definition of seasonal work, and whether the high proportion of self-employment is masking the fact the many people are under-employed or employed within the 'black economy';
 - that over-reliance on the tourism economy is a particular risk in case of a further outbreak of Foot & Mouth Disease or the vagaries of the weather;
 - glad to see encouragement of employment opportunities for young people, but this is reliant on economic growth;
 - support flexible, criteria based policies that will be responsive to changing circumstances; and
 - would strongly recommend that the need for economic development is balanced with the protection of the landscape, as the relocation of a business to a location outside the National Park could have a significant impact on the local community in terms of job losses.
- The Crown Estate (TCE) considered that the wording of the policy was unclear, and implied that all criteria should be met. Some of the points were repeated in subsequent policies and TCE suggested that this should be avoided.

Officer Comments and Recommendations

- Support welcomed for the section and policy SE-S1.
- Agriculture is also considered in the Exmoor National Park Partnership Plan as agriculture is more specific to land management, whereas the Local Plan influences development and land use. The section relating to agriculture and forestry is only in relation to buildings and tracks requiring planning permission. The majority of this particular section (policy SE-S4) relates to agriculture.
- The policies within this section do not specifically reference the requirement for a planning obligation. Legislation and practice guidance set the parameters for the use of planning obligations in that they should be reasonably related in scale and kind to the development, directly related to the development, and are necessary to make the development acceptable in planning terms (see policy relating to Securing Planning Benefits). Maintaining the affordability of owner occupied homes for people living or working locally, is achieved through a local occupancy tie and keeping the size of properties to less than 90sqm net floorspace which helps to ensure that these properties continue to meet the future needs of the community for affordable housing.
- Although the Local Plan sets out planning policies which set the framework for transport and development, the National Park Authority is not a Highways Authority and more detailed policies for transport are set out the transport plan for the respective authorities within the National Park.
- In relation to WSC comments:
 - The high costs of housing within the National park and relatively low incomes are set out in the housing section and within the spatial portrait. The term seasonality is used in relation to the tourism season employment patterns.

- In relation to tourism, this section and the plan as a whole also provide a flexible approach to provide for a range of business and other employment opportunities and the text states that the policies aim to encourage development which will strengthen and diversify the Exmoor economy.
- The plan encourages economic growth appropriate to the scale and designation of the area as a National Park consistent with National Park purposes.
- The intention of the supporting text in relation to in relation to growth and intensification is to recognise that while it is important to encourage new businesses and the expansion of successful businesses there may be occasions when further and continued growth and intensification may not be appropriate or may need a new sustainable location to accommodate it.
- The comment relating to rebuilding of the railways is addressed through policies RT-D13 and RT-S2 in the Achieving Enjoyment for All section - these deal address the safeguarding of land along former railways and the reinstatement of the Lynton and Barnstaple Railway.
- Further consideration will be given to rationalising the policy wording to avoid unnecessary repetition.

Agreed actions

1. Rationalise the supporting text, reduce repetition and ensure the policy intention is clear.

Total number of responses to SE-S2 Business Development in Settlements	3
Total number of responses in support	3
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	0

SE-S2: Summary of Responses

Support

- Supporting comments received from Historic England and North Devon Council.

Officer Comments and Recommendations

- Support welcomed.

Agreed actions

None required.

Total number of responses to SE-S3 Business Development in the Open Countryside	5
Total number of responses in support	2
Total number of responses in support subject to amendment	0
Total number of responses in objection	2
Total number of responses providing a general comment	1

SE-S3: Summary of Responses

Support

- Support received from Historic England and the National Farmers Union (NFU).

Object

- The Greater Exmoor Shoots Association (GESA) raised concern regarding the marginalisation of their role in the Local Plan and suggest that the growth of this sector (game-bird shooting) of the Exmoor economy has been noticeably greater than in any other area, and is entirely without public funding. Comments on diversification do not relate to shooting which provides a secondary use of the land.
- The Crown Estate (TCE) stated the following:
 - that the wording of the policy is unclear, should be re-worded and avoid unnecessary repetition so that it is set out in a simpler and more coherent way;
 - it is unsuitable to constrain new build development to be solely within Local Service Centres and Villages;
 - businesses that are viable within the rural setting of the Park and which satisfy all other policies contained within the plan should not be constrained in this way - would welcome a policy that is less restrictive to the development of new build schemes; and
 - The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2013 deemed development consisting of a change of use of a building and any land within its curtilage from use as an agricultural building to a flexible use class as permitted development.

General Comments

- WSC raised concerns about how the viability of a farm is assessed in terms of what ratio of farm diversification activity is considered acceptable in planning terms and that the principle of applying ties to existing buildings on a farm where diversification activity is taking place, could be a major barrier to future investment and leverage of additional capital.

Officer Comments and Recommendations

- Support for the policy approach is welcomed.
- The supporting text sets out a brief summary of game shooting and development on Exmoor as a form of farm diversification. It is not intended to reflect all aspects of the activity which is only one, though an important form, of farm

diversification on Exmoor. Much shooting activity in any case has not been subject to planning. Further detail is set out in the section Achieving Enjoyment for All, specifically in relation to the RTD10 Recreational Development policy.

- In relation to the points raised by TCE:
 - The complexity of the plan as a whole will be reviewed to ensure that it is clear and not repetitive.
 - As a National Park there is a requirement to conserve and enhance the natural beauty of the area, which is affected by amount, scale and appearance of new development. Ensuring that Exmoor remains a landscape relatively free from intrusive development requires the National Park Authority to manage the impact of development on the landscape. The policy aims to ensure appropriate development for business through reuse of existing buildings that are part of a hamlet or farm group because to provide new buildings or conversion of isolated buildings would introduce a potentially harmful use in terms of the agricultural and traditional character of the National Park's countryside. The economy of the area is underpinned by the high environmental quality of the area.
 - It is recognised that subsequent changes to the General Permitted Development Order 2015 enable permitted development rights in certain circumstances for the change of use of agricultural barns to flexible uses - including isolated barns and this will be referenced in the supporting text.
 - The plan seeks to provide for both the reuse of existing buildings and new build in or adjoining settlements to allow for sustainable communities where housing and jobs can be provided close by and support existing services and businesses such as local shops rather than potential issues with sustainability providing for new build businesses away from settlements increasing the need for people to travel to their place of work.
 - The Local Plan is encouraging of appropriate diversification which supports farm holdings and provides for increased flexibility in this regard for the reuse of modern 'non-traditional' buildings.
 - In the open countryside there is scope for new buildings, associated with a dwelling, to support home-based businesses (SE-D1 Home Based Businesses).

Agreed actions

1. Include reference to the changes to permitted development rights for agricultural buildings in the text.
2. Remove clause relating to planning obligations.
3. Review the policy to reduce repetition and ensure the policy intention is clear.

Total number of responses to SE-D1 Safeguarding Existing Employment Land and Buildings	3
Total number of responses in support	1
Total number of responses in support subject to amendment	0
Total number of responses in objection	1
Total number of responses providing a general comment	1

SE-D1: Summary of Responses

Support

- Support received from SCC regarding opportunities to promote the importance of tranquillity.

Object

- The Crown Estate (TCE) commented that the Authority has given no consideration to the possibility of converting existing buildings to a live/work arrangement nor made any reference to new build live/work schemes that could be (where viable) affordable and/or tied as a 'Principal residence'.

General Comments

- WSC commented that the creation of Rural Work Hubs should be encouraged that can be used by home workers to over-come some of the issues cited by them, and help support the viability and growth of their business activity.

Officer Comments and Recommendations

- Support welcomed.
- The concept of live/work units is acceptable where proposals are otherwise consistent with policies in the plan – this will be clarified in the policy and supporting text.
- The potential value of rural work hubs is acknowledged and in principle proposals could be brought forward under Policy SE-S2. Reference to rural work hubs will be included in text to Policy SE-S2 Business Development in Settlements.

Agreed actions

1. Include reference to live/work units in the policy and supporting text, cross referencing to housing policies in the Plan.
2. Include a reference to home-working hubs in the supporting text to SE-S2 Business Development in Settlements.

Total number of responses to SE-D2 Home Based Businesses	0
Total number of responses in support	0
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	0

SE-D2: Summary of Responses

No responses received.

Officer Comments and Recommendations

None required.

Agreed actions

None required.

Total number of responses to SE-S4 Agricultural and Forestry Development	7
Total number of responses in support	2
Total number of responses in support subject to amendment	3
Total number of responses in objection	0
Total number of responses providing a general comment	2

SE-S4: Summary of Responses

Support

- The Local Plan is clear and has a good understanding of the issues and opportunities facing agriculture and the policy is within current guidelines (NFU).

Support subject to amendments

- Historic England support the recognition of historic farmsteads in the supporting text and recommend that a link to policy CE-S4 Cultural Heritage and Historic Environment could be usefully mentioned in the policy.
- Exmoor Society were concerned about the impact of large agricultural buildings on the landscape, including those in isolated locations. Concern was raised regarding clause 1.f) and whether it afforded sufficient protection. Consideration should be given to moving the clause up so it is closely linked to clause 1.c) in relation to location.

General Comments

- Large agricultural buildings are noted to have become more noticeable in the Exmoor landscape in recent years. Concern was also raised about the impact of livestock in relation to greenhouse gas emissions, and other agricultural practices that negate the potential for wildlife, such as hedgerow removal.

Officer Comments and Recommendations

- Support welcomed.
- Agree to move clause 1.f) and review the wording of the clause. The Plan should be read as a whole and therefore policies that specifically relate to the National Park statutory purposes and landscape character would also be considered in the determination of any agricultural building proposals and appropriate references will be used.

- Many of the points raised under ‘general comments’ relate to land management rather than development, and are addressed as far as possible in the Exmoor National Park Partnership Plan. Policies relating to landscape character (CE-s1) seek to retain important landscape features such as hedgerows and information is also set out in relation to the circumstances where landowners need to apply for a Hedge Removal Notice.
- Neither the National Park Authority nor the Local Plan can control the types of farming which take place, although extensive farming practices are encouraged. The Local Plan contains policies to guide development within the National Park and policies seek to ensure that development such as agricultural buildings respond and reinforce landscape character.

Agreed actions

1. Include reference to policy CE-S4 Cultural Heritage and Historic Environment in the policy.
2. Move clause 1.f) below 1.c). Review the wording of the clause to ensure the design and siting of agricultural and forestry buildings responds to and reinforces landscape character.

Section 9: Achieving Enjoyment For All

Total number of responses to Section 9	288
Total number of responses in support	268
Total number of responses in support subject to amendment	6
Total number of responses in objection	5
Total number of responses providing a general comment	9

5.5 A considerable number of supporting comments were received in relation to this section of the Plan. These were predominantly related to policies that provide for the safeguarding of former railway lines and the reinstatement of the Lynton & Barnstaple narrow gauge railway.

RECREATION & TOURISM

Total number of responses to RT-S1 Recreation and Tourism	16
Total number of responses in support	13
Total number of responses in support subject to amendment	2
Total number of responses in objection	0
Total number of responses providing a general comment	1

RT-S1: Summary of Responses

Support

- Support received from Historic England and North Devon Council.
- Several comments on the section as a whole and the supporting text in relation to the tourism economy were supported by individuals who were in favour of the reinstatement of the Lynton & Barnstaple Railway.

Support subject to amendments

- The Crown Estate (TCE) aim to develop and enhance the tourism industry in Exmoor with the aim of increasing public awareness and the enjoyment of the National Park. However, TCE raise concerns regarding the emphasis place on the 'quiet enjoyment' of the National Park and the 'experience of tranquillity'. The Authority is therefore urged to look more closely at this issue and define its terms.
- The Plan is very positive but should consider whether future extensions to the Lynton & Barnstaple Railway would be desirable or useful.

General Comments

- Sport England stated that they would encourage a "positive for sport approach" Local Plan Policy to enable the existing and future users opportunity to take part in recreational activities that meet social, health and well-being agendas.

Officer Comments and Recommendations

- Support welcomed from specific consultation bodies Historic England and North Devon Council.
- The supporting text explains the types of recreational pursuits that would be considered to have an unacceptable impact on the quiet enjoyment of Exmoor's special qualities and the experience of tranquillity. It is not the intention that the policy will not permit any actively which generates noise.
- Policies RT-D10 Recreational Development, RT-D11 Equestrian Development and RT-D12 Access Land and Rights of Way, are considered to be positive for sport and recreation within the National Park. The written justification to policy RT-S1 particularly highlights key opportunities for sport and recreational activities on Exmoor including national events that utilise the rights of way infrastructure and the natural environment Exmoor has to offer.
- The strategic policy RT-S2 Reinstatement of the Lynton & Barnstaple Railway, sets out the key principles for the reinstatement of the Lynton and Barnstaple railway. Part of the reinstatement and potential extension of the line to Lynton is addressed within the Lynton & Lynmouth Neighbourhood Plan (applies within Lynton & Lynmouth civil parish area).

Agreed actions

None required.

TOURISM ACCOMMODATION

Total number of responses to RT-D1 Serviced Accommodation	1
Total number of responses in support	1
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	0

RT-D1: Summary of Responses

Support

- Support received from Historic England.

Officer Comments and Recommendations

- Support welcomed.

Agreed actions

None required.

Total number of responses to RT-D2 Staff Accommodation	1
Total number of responses in support	1
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	0

RT-D2: Summary of Responses

Support

- Support received from Porlock PC.

Officer Comments and Recommendations

- Support welcomed.

Agreed actions

None required

Total number of responses to RT-D3 Safeguarding Serviced Accommodation	3
Total number of responses in support	3
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	0

RT-D3: Summary of Responses

Support

- Support received for the policy approach allowing some flexibility for changes of use to residential where hotels/guesthouses were formerly a single dwelling.
- Support for the policy also received from Historic England.

Officer Comments and Recommendations

- Support welcomed.

Agreed actions

None required.

Total number of responses to RT-D4 Non-Serviced Accommodation	2
Total number of responses in support	2
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	0

RT-D4: Summary of Responses

Support

- Support received from Somerset County Council (SCC) in relation to highlighting the importance of protecting tranquillity.
- Support for the policy also received from Historic England.

Officer Comments and Recommendations

- Support welcomed.

Agreed actions

None required.

Total number of responses to RT-D5 Tented Camp Sites	2
Total number of responses in support	2
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	0

RT-D5: Summary of Responses

Support

- Support for the policy approach received from Historic England and The Crown Estate.

Officer Comments and Recommendations

- Support welcomed.

Agreed actions

None required.

Total number of responses to RT-D6 Camping Barns	1
Total number of responses in support	1
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	0

RT-D6: Summary of Responses

Support

- Support for the policy approach received from The Crown Estate.

Officer Comments and Recommendations

- Support welcomed.

Agreed actions

None required.

Total number of responses to RT-D7 Certificated Caravan and Touring Caravan Sites	1
Total number of responses in support	1
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	0

RT-D7: Summary of Responses

Support

- Support for the policy approach received from Historic England.

Officer Comments and Recommendations

- Support welcomed.

Agreed actions

None required.

Total number of responses to RT-D8 Static Caravan Sites	0
Total number of responses in support	0
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	0

RT-D8: Summary of Responses

No responses received.

Officer Comments and Recommendations

None required.

Agreed actions

None required.

Total number of responses to RT-D9 Alternative Camping Accommodation	2
Total number of responses in support	2
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	0

RT-D9: Summary of Responses

Support

- Support for the policy received from Historic England.
- The Crown Estate (TCE) stated that it was pleased to see that alternative accommodation has been given more flexibility than the traditional camping sites.

Officer Comments and Recommendations

- Support welcomed.

Agreed actions

None required.

RECREATION

Total number of responses to RT-D10 Recreational Development	8
Total number of responses in support	4
Total number of responses in support subject to amendment	0
Total number of responses in objection	2
Total number of responses providing a general comment	2

RT-D10: Summary of Responses

Support

- Support for the policy received from SCC in relation to the opportunity to minimise the impact of some development at a pre-application stage and provides opportunity to highlight the importance of protecting tranquillity.
- Support for the policy received from Historic England.
- TCE was supportive of the above policy and were pleased to see that, where appropriate and where it can demonstrated to be appropriate, development can be located outside of local service centres and villages.

Object

- The Greater Exmoor Shoots Association (GESA) stated that their role had been marginalised in the Local Plan and some comments are grudging or lack an understanding of the advantages of game shooting to the National Park. GESA suggested that there should be some balancing reference to the benefits to the environment that shooting brings.
- GESA stated the supporting text relating to where planning permission may be required for game shooting activities were imprecise and unclear.

General Comment

- Porlock PC highlighted that further shoots around Porlock were not wanted due to noise, and risks to traffic and walkers.
- Sport England stated they would encourage a "positive for sport approach" Local Plan Policy to enable the existing and future users opportunity to take part in recreational activities that meet social, health and well-being agendas.

Officer Comments and Recommendations

- Support welcomed.
- It is considered that GESA continues to be reflected in the Local Plan with regard to its partnership working with the Authority in relation to the encouragement of good environmental management of the shoots across Exmoor. The supporting text in relation to game shooting states that activities and development associated with shoots such as rearing pens, game crops, feeding equipment can individually and cumulatively adversely impact the National Park and access to and enjoyment of it. This infers that these are potential impacts that should be considered in relation to landscape management and for any development proposals that may come forward. The wording of the supporting text will be reviewed to ensure the intention is clear.
- The Plan cannot be precise because of the nature of game-shooting activities and its status within planning means that there will be occasions where planning permission is required and other instances where development is classified as permitted development. This is stated in the draft Exmoor Shoot Guidelines available on the National Park website.
- Strategic policy RT-S1 and development management policy RT-D10 sets out tests for recreational development which would apply to any shooting activity that is considered to require planning permission.

Agreed actions

3. Review the supporting text for policy RT-D10 in relation to game shooting on Exmoor.

Total number of responses to RT-D11 Equestrian Development	2
Total number of responses in support	2
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	0

RT-D11: Summary of Responses

Support

- Support received from Historic England and SCC.

Officer Comments and Recommendations

- Support welcomed.

Agreed actions

None required

Total number of responses to RT-D12 Access Land and Rights of Way	0
Total number of responses in support	0
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	0

RT-D12: Summary of Responses

No responses received.

Officer Comments and Recommendations

None required.

Agreed actions

None required.

FORMER RAILWAYS

Total number of responses to RT-D13 Safeguarding Land Along Former Railways³⁰	33
Total number of responses in support	31
Total number of responses in support subject to amendment	1
Total number of responses in objection	1
Total number of responses providing a general comment	0

RT-D13: Summary of Responses

Support

- Support from a wide range of individuals including supporters of the reinstatement of the Lynton & Barnstaple Railway.
- Support received from Historic England.
- North Devon Council recognise cross -boundary opportunities for enhancing the network, including the former Lynton and Barnstaple Railway, through opportunities for cross boundary linkages. It complements the policies in the emerging North Devon and Torrington Local Plan.

Support subject to amendments

- One concern was raised in relation to the Lynton and Barnstaple Railway and that the route should be reserved for rail purposes. This need not exclude the creation of alternative parallel access routes where other environmental factors allow this.

Object

- The former trackbed of the Lynton and Barnstaple Railway should be excluded from the statement in the supporting text which stated that the safeguarding of

³⁰ Relates specifically to comments on this policy (RT-D13) and comments relating to paragraphs in the supporting text which relate to safeguarding (including 9.108, 9.111-112)

former railways does not imply the acceptance of the principle for a reinstated railway scheme.

Officer Comments and Recommendations

- Support welcomed.
- Policy RT-D13 and this paragraph relate to both the West Somerset Mineral Line and the former Lynton and Barnstaple Railway. In the case of the former there are no reinstatement plans and it is considered that it is important given its existing and potential recreational value to ensure that it is safeguarded as an access route.
- Policy RT-S2 Reinstatement of Lynton & Barnstaple Railway defines the measures that any proposed reinstatement should take account of when submitting planning applications. The supporting text will be reviewed to ensure the policy approach is clear.

Agreed actions

1. Review the supporting text in relation to the principle of the reinstatement of the Lynton & Barnstaple Railway.

Total number of responses to RT-S2	215
Total number of responses in support	204
Total number of responses in support subject to amendment	3
Total number of responses in objection	2
Total number of responses providing a general comment	6

RT-S2: Summary of Responses

Support

- Considerable support for the policy and supporting text was received from a large number of individual supporters of the Lynton & Barnstaple Railway.
- Support also received from specific consultation bodies including Historic England and North Devon Council who stated that the reinstatement of the route complemented Policy BAR16 in the emerging North Devon and Torridge Local Plan.

Support subject to amendments

- Lynton & Barnstaple Railway Trust (L&BRT) strongly supported the inclusion of a specific policy for its eventual reinstatement. Concern at unnecessarily detailed and repetitive commentary and policy which are considered to be inaccurate or overreach the appropriate scope of the Plan. Suggest that the policy and text could be better and more succinctly expressed and that the commentary should contain the specific objectives for the reinstatement of the railway and that Policy RT-S2 contains the requirements by which these objectives should be achieved. It was suggested that the commentary could also briefly cross

reference the other policies of the plan that the reinstatement of the railway engages.

- L&BRT also suggest that the commentary and policy effectively attempt to prejudge the likely nature of the railway reinstatement proposals when the full detail is not known, particularly in relation to the policy requirement that the proposal should not generate the need for a new dwelling – where if a dwelling is required it should be judged against the housing policies in the Plan. It is also suggested in relation to parking requirements that if the provision of parking (including peak parking) is acceptable in terms of impacts on the environment of the Park then there should be no need to minimise it.
- Concern was also raised in relation to the railway reinstatement 80 years after it closed, during which time changes affecting the route of the former railway and the buildings and other structures associated with it have occurred. The use of the reinstated railway is also noted to be different; the majority of users visiting the railway as a recreational resource. The requirement of clause 1.a) relating to the replication of the railway, was considered unduly onerous (L&BRT).
- Also suggested, was that Paragraph k) of Policy RT-S2 is not workable (legal agreement will be sought to ensure the line is retained as a continuous linear access route in the event that it becomes redundant) as the contracts for the purchases which the railway have already made which often contain an agreement that the previous landowner may repurchase the land. In many cases this was a requirement of the sale (L&BRT).
- Paragraph b) i) of Policy RT-S2 requires that the reinstatement should 'Seek to re-use the original buildings associated with the former railway both within and outside the National Park.' Buildings outside the National Park fall within the jurisdiction of a different planning authority. We are therefore unclear as to the intended purpose of this element of policy, or how it is envisaged it could operate (L&BRT).
- A further suggestion was made for the plan to consider whether future extensions to the railway would be desirable or useful.

Object

- Objection received in relation to the text and policy requiring the railway to be safeguarded as a linear access route if the use of the reinstated railway becomes redundant – the comment received stated that this would only be feasible if the agreement for the land acquisition permits this.
- A further objection related to the requirement of further details for the extension of the railway to Lynton, and the Plan should be clear that these details are not included.

General Comments

- L&BRT stated that they did not see how the reinstatement of the railway could be construed as major development in terms of the reasoning and examples used in the commentary of the Plan, and if it were how it could be justified as acceptable in line with the Silkin Test principles and the principal elements of

Policy GP3 of the plan. It was suggested that the sentence in the supporting text should be removed.

- Supporting text unnecessarily creating red tape.
- Railway will be subject to an environmental assessment.
- Railway will relieve pressure on local roads.
- Land associated with the railway can provide a protected corridor for wildlife.
- Reference in the text should be to Devon County Council (not Somerset and Devon County Councils) regarding the reinstatement of the railway.

Officer Comments and Recommendations

- Support welcomed for the policy approach and supporting text.
- The text relating to securing a legal agreement will be removed following further investigation into the purchase of the land by the Lynton & Barnstaple Railway Trust.
- The Lynton & Lynmouth Neighbourhood Plan was formally brought into force as part of the development plan for the Lynton & Lynmouth neighbourhood area (aligned with the boundary of the civil parish) in December 2013. The proposal for the reinstatement and/or extension of the railway within the Lynton & Lynmouth parish area will therefore be determined using the neighbourhood plan policy E12 Lynton & Barnstaple Railway and policies in the Exmoor National Park Local Plan which are strategic policies or that relate to aspects on which the Neighbourhood Plan is silent.
- In relation to the points raised by the L&BRT:
 - The text and policy will be reviewed to ensure policy is not repetitive and does not include unnecessary cross referencing – in relation to replication it is considered that clause 1.c), relating to generating the need for a dwelling, will be removed.
 - It is considered that any proposals should seek to replicate the railway and this should be a crucial principle underpinning any reinstatement. Indeed, a proposal which seeks to achieve this has the potential to conserve and enhance the National Park, including cultural heritage as well as promoting the public enjoyment and understanding consistent with the National Park statutory purposes. The draft policy seeks to balance this aspiration with a degree of flexibility in recognition of practical difficulties that reinstatement may bring, some considerable time after closure of the original line.
 - It is considered that parking is likely to form part of a proposal for reinstatement of the railway and is also one of the issues which, unless carefully managed, has great potential to cause harm in what is open countryside of both the National Park and its setting. The impact of parking is likely to be directly related to its extent, and the clause will be amended to cross reference policies directly relating to parking provision in the Local Plan that will help ensure that scale of parking provision is appropriate and take into account environmental constraints. There is a presumption against

providing for peak parking demand, however temporary solutions for peak parking may be employed where necessary and appropriate.

- Clause 1.b)i) will be amended to remove the text ‘both within and outside the National Park’ as this implies the Plan applies outside the National Park boundary. The supporting text explains the joint working between North Devon Council and the Authority to ensure a consistent policy approach to the reinstatement of the railway.
- The National Planning Policy Framework (para. 116) sets out the tests for major development in designated areas including National Parks and the policy for Major Development (see comments relating to GP3 Major Development) will be amended to give further clarity. However, it will be a matter of planning judgement whether a development is considered to be major depending on the scale, character and nature of the proposal in the context of the National Park and the local area.
- In relation to the comment regarding unnecessary red tape; whilst it is recognised that the railway did operate until 1935, the designation of the National Park subsequently occurred in 1954. The statutory purposes of National Park designation are established in legislation. It is therefore important that measures are in place to ensure that there are no unacceptable adverse impacts on the natural beauty, wildlife and cultural heritage of the National Park.
- The Plan should be read as a whole. Policy CE-S2 Biodiversity seeks to conserve and enhance wildlife, habitats and sites of geological interest. Environmental Impact Assessment (EIA) regulations set out the procedure for identifying certain types of development likely to have significant effects on the environment.

Agreed actions

1. Review the supporting text and policy to ensure the policy intention is clear and avoids unnecessary repetition and cross-referencing.
2. Remove clause 1.k) relating to seeking a legal agreement to ensure the railway is retained as a linear access route.
3. Remove clause 1.c) relating to the proposal not generating the need for a separate dwelling.
4. Clause 1.b)i) will be amended to remove the text ‘both within and outside the National Park’.

Section 10: Achieving Access For All

Total number of responses to Section 10	47
Total number of responses in support	12
Total number of responses in support subject to amendment	4
Total number of responses in objection	3
Total number of responses providing a general comment	28

TRANSPORT

Total number of responses to AC-S1 Sustainable Transport	7
Total number of responses in support	3
Total number of responses in support subject to amendment	1
Total number of responses in objection	0
Total number of responses providing a general comment	3

AC-S1: Summary of Responses

Support

- Support received from individuals regarding the need for essential traffic management systems and the reinstatement of the Lynton & Barnstaple Railway to improve off-road accessibility for tourists.
- Support received from North Devon Council for the chapter as a whole.

Support subject to amendments

- A comment related to the need for a balance being required in relation to sustainable transport so economic development is not disadvantaged.

General Comments

- Somerset County Council (SCC) encouraged ENPA to specify that electric charging points should be 16amp. This is because some electric vehicle models will not charge at 13amp.
- An individual commented on the possibility of a light railway from Dulverton to Brushford and Exebridge.
- Porlock PC highlighted the importance of the 300 coastal bus service and the hope for continued ENPA support for this service.

Officer Comments and Recommendations

- Support welcomed.
- It is not the intention of the Plan to stymie appropriate economic development in the National Park. Policy AC-S1 encourages sustainable modes of transport by working with appropriate agencies.
- The amp required for charging electric vehicles is likely to change over time as newer models due soon will have larger capacity on-board chargers fitted which will enable them to accept 32 amp and therefore charge twice as fast. The wording will be amended to refer to suitable charging requirements, to enable flexibility to adapt to what these might be in future.

- The potential or need for such an infrastructure scheme between Dulverton and Exebridge has not been identified.
- The Plan recognises the importance of public transport as a means of sustainable travel for local communities and visitors alike. The future funding of public transport services is beyond the remit of the planning system.

Agreed actions

1. Wording will be amended to refer to suitable charging requirements, to enable flexibility to adapt to what these might be in future.

Total number of responses to AC-S2 Transport Infrastructure	3
Total number of responses in support	1
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	2

AC-S2: Summary of Responses

Support

- Historic England supported clauses 1. a), b) and c) of this policy.

General Comments

- Vigorous control of simple signage was stated as being required as it was considered that there was not enough monitoring or enforcement at present (Porlock PC).
- A further comment stated that clause 1.g) should include reference to damage to local businesses as well as to the environment during the maintenance or construction of transport infrastructure.

Officer Comments and Recommendations

- Support welcomed.
- Comment regarding monitoring and enforcement noted and passed to the relevant team.
- The comment referring to clause 1.g) relates to road closures and cannot be considered as a planning matter.

Agreed actions

None required.

Total number of responses to AC-D1 Transport and Accessibility Requirements for Development	2
Total number of responses in support	1
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	1

AC-D1: Summary of Responses

Support

- Support received from Historic England.

General Comments

- SCC encouraged ENPA to specify that electric charging points should be 16amp. This is because some electric vehicle models will not charge at 13amp. In addition, the NPPF tends to use the word 'severe' in this context, it may be helpful to use this wording here for sake of consistency.

Officer Comments and Recommendations

- Support welcomed.
- The wording has been changed to 'significant' in line with NPPF wording (para 32). This was checked with SCC and confirmed was the correct interpretation of the NPPF.

Agreed actions

1. Change the term 'severe' to 'significant' in clause 2 to ensure this terminology is consistent with the NPPF.

Total number of responses to AC-S3 Traffic Management and Parking	7
Total number of responses in support	0
Total number of responses in support subject to amendment	0
Total number of responses in objection	1
Total number of responses providing a general comment	6

AC-S3: Summary of Responses

Object

- SCC stated that it was not clear how the figures in 10.1 were derived. Parking standards should be clearly evidenced and based on current policy. Any such standards should be robust enough to be defended during the Local Plan examination process.

General Comments

- Nettlecombe PC noted the importance of trees to provide shading for vehicles.
- Exmoor Trust stated that road works and road closures are something which cause much anxiety and some hardship amongst local people and suggest that there should be a way of signing a shorter route for cars and smaller vehicles.

- SCC noted that there was a need to consider adverse impacts on the highway relating to reserving car parks specifically for residents.
- The A396 is not noted as a freight route in the Somerset Freight Map and the Plan should not promote its use by HGVs (SCC).
- Missing reference to Table 10.1 in the text noted and grammatical errors in the text.

Officer Comments and Recommendations

- The parking standards set out in Table 10.1 are based on the Somerset's County wide Zone C (rural) standards. They are identical in all cases for car parking except for residential standards which incorporate some variations to reflect local circumstances by rounding those standards which include a half a car parking space. This is because the scale of housing development in the National Park is low and even where a scheme of more than one residential unit is proposed; it will often only include one dwelling of a specific size. The parking standards in table 10.1 will be amended to include standards for motorcycle, cycle and disabled parking. These are based on the SCC standards except where the size thresholds are too high for Exmoor, in which case lower thresholds are used, based on existing Exmoor standards
- In relation to the comment raised by Nettlecombe PC, text will be added to note that trees and other planting schemes are also useful in landscaping and screening any parking provision.
- The comment relating to diversions is an issue which is important to local communities, however it is not a planning matter.
- The impacts of any decision on other users in relation to specific parking provision will be considered in determining proposals. The needs of local businesses are also an important part of the National Park's communities, and would also be taken into account in assessing and addressing community needs for parking.
- The Somerset wide network does not identify a route network for the National Park and so at a local level an approach has been identified partially based on the map in the Somerset Freight Strategy 2011 and the South West Regional Freight Map. The A396 is not identified as a County Freight Route (only the A399 in the North Devon area of the National Park), but is identified as an 'A Road'. The supporting text will be amended to ensure that the explanation of the Exmoor Route Network is clear.

Agreed actions

1. Amend the table relating to parking standards to include standards for motorcycle, cycle, and disabled parking and reference the Somerset County Council Parking Standards.
2. Add reference to trees and planting schemes in relation to landscaping and screening parking provision.

3. Ensure the supporting text relating to the Exmoor Route Network is clear.
4. Reference and errors to be amended in the text.

Total number of responses to AC-D2 Parking Provision and Standards	3
Total number of responses in support	0
Total number of responses in support subject to amendment	2
Total number of responses in objection	0
Total number of responses providing a general comment	1

AC-D2: Summary of Responses

Support subject to amendments

- An individual comment noted that parking restrictions should not have negative effect on economic development or viability.
- SCC would encourage ENPA to include specific parking standards for disabled users to ensure the needs of these users are not omitted during the design of a development.

General Comments

- Porlock PC considered that the parking standard for hotels was unrealistic in Porlock.

Officer Comments and Recommendations

- Parking provision, unless carefully managed, has great potential to cause harm to the National Park. The impact of parking is likely to be directly related to its extent and therefore it merits a specific policy to provide clarity on the principles by which an application would be judged. Policy AC-S3 Traffic Management and Parking states that there is a ‘presumption against providing for peak parking demand’. However, there are opportunities for temporary parking solutions as defined in policy AC-D3 Temporary Parking.
- The supporting text states the design and dimensions for disabled parking bays should be in accordance with current Regulations. However, it is considered that parking standards for disabled users should be added to Table 10.1.
- The parking standards are based on the Somerset Parking Strategy for low population areas to be used for any new hotels that may come forward through the conversion and change of use of suitable buildings. The supporting text also states that “there may be circumstances such as change of use, or new development in restricted locations where it is not possible to accommodate parking...the NPA will take into account the proximity of public parking...”

Agreed actions

1. Amend the table relating to parking standards to include standards for disabled parking and reference the Somerset County Council Parking Standards.

Total number of responses to AC-D3 Temporary Parking	0
Total number of responses in support	0
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	0

AC-D3: Summary of Responses

No responses received.

Officer Comments and Recommendations

None required.

Agreed actions

None required.

ELECTRICITY AND COMMUNICATION NETWORKS

Total number of responses to AC-S4 Electricity and Communication Networks	16
Total number of responses in support	3
Total number of responses in support subject to amendment	1
Total number of responses in objection	0
Total number of responses providing a general comment	12

AC-S4: Summary of Responses

Support

- Support received from SCC in relation to the opportunity to minimise the impact of development at pre-application stage.
- Historic England support the policy approach.
- Another supportive comment related to the need for Exmoor inhabitants to be able to access fast broadband.

Object

- Mobile Operators Association (MOA) objected to clause 2.a) of policy AC-S4. In accordance with NPPF, the Mobile Network Operators aim to keep the environmental impact of communications infrastructure to a minimum. In some instances however, the provision of a high quality electronic communications network, in line with national policy, may result in some minor impact on the character or appearance of the surrounding area. In order to ensure that the policy is consistent with NPPF, we would also suggest a minor addition to the wording of criterion 2a. as follows: 'the location, siting, scale and design of structures will not cause any unacceptable adverse impacts on landscape and/or seascape character

General Comments

- The Plan needs to give much greater priority and reflect a stronger sense of urgency of improved communications for this remote rural community, and ensure mobile phone coverage is available in all parts of the moor for residents and visitors.
- Improved broadband would bring added business to Exmoor and huge improvements to those already here in the holiday and tourism trade, including those who work from home, farmers, the elderly, emergency services and for online shopping (Exmoor Trust).
- Western Power Distribution (WPD) sought to confirm that policy AC-S4 (3) does not include local distribution on wood poles as the word 'high voltage' is anything above 1000 volts and would include 11kV and 33kV wood pole lines which exist on most of Exmoor and which are an essential requirement for Exmoor homes and businesses.
- National Grid stated that they are committed to ensuring that all work carried out in, or affecting National Parks, is done in a manner which reflects the duties on National Grid under the National Parks and Access to the Countryside Act 1949 and other relevant legislation, including The National Parks (Scotland) Act 2000, in particular the duty to have regard to National Park purposes.
- National Grid noted policy AC-S4 Electricity and Communication Networks and will seek to avoid major new developments in National Parks unless there are circumstances where a development is of national interest and no reasonably practicable alternative is available.
- In respect of the provision of new and improved infrastructure: AC-D5 Fixed Line Transmission Infrastructure, National Grid has made particular commitments in respect of National Parks (see above) and will seek to avoid major new developments in National Parks unless there are circumstances where a development is of national interest and no reasonably practicable alternative is available.
- MOA highlighted a correction to a reference.
- Winsford PC stated that improvements to broadband and mobile coverage were fundamental to the National Park.
- Importance of the telephone network was highlighted by an individual and a further comment encouraged the improvement of aerial and satellite based internet access.
- Nettlecombe PC highlighted the importance of broadband provision.

Officer Comments and Recommendations

- Support welcomed for the policy approach, including comments from SCC and Historic England.
- The specific point raised by the MOA in relation to adding the word 'unacceptable' to clause 2.a) is considered to be suitable and the policy will be amended accordingly.

- The importance of broadband and mobile phone coverage for residents, businesses and visitors are noted. Whilst the policy approach is supportive of broadband provision across the National Park in terms of the development required, actions in the Exmoor National Park Partnership Plan go further in support of broadband provision in the National Park. Action C1.6 aims to work in partnership to improve access of communities and businesses in Exmoor to high speed broadband and other communications by ensuring that broadband roll out benefits Exmoor and improving mobile phone coverage.
- The supporting text to policy AC-S4 clarifies that a mix of technologies will be required in rural areas to increase improvement of internet access.
- The comments made by National Grid in relation to their commitment to have regard to National Park purposes are noted. Policy AC-S4 refers to GP3 Major Development which sets out the tests for major development as stated in the NPPF. In relation to the comments made in relation to AC-D5 Fixed Line Transmission Infrastructure, AC-S4 is the strategic policy preceding Policy AC-D5 and therefore also applies.

Agreed actions

1. Update clause 2.a) to include the term ‘unacceptable’ preceding ‘adverse impacts’.
2. Correct reference to MOA.
3. Clarify the meaning of transmission lines in terms of local distribution on wood pole lines, in the supporting text.

Total number of responses to AC-D4	4
Total number of responses in support	2
Total number of responses in support subject to amendment	1
Total number of responses in objection	0
Total number of responses providing a general comment	1

AC-D4: Summary of Responses

Support

- Support received for the policy approach, including from Historic England.

Support subject to amendments

- MOA supported the inclusion of policy AC-D4 but considered the wording of the sequential approach set out in clause 1 to be overly restrictive. It was stated that the NPPF (para 43) does not specifically mention that options for infrastructure should be sequential. Further reference was made to the 2013 Code of Practice that planning policies should support economic growth in rural areas while also giving appropriate weight to conserving landscape and scenic beauty in National Parks.

General Comments

- Porlock PC questioned whether siting equipment on trees was suitable in relation to safety considerations.

Officer Comments and Recommendations

- It is considered that a sequential approach is justified in the National Park; however, further consideration will be given to the policy and text to ensure that the policy tests for future telecommunications infrastructure proposals are reasonable whilst ensuring that it can be clearly demonstrated that there will be no unacceptable adverse impact on the National Park.
- Criteria 1b will be amended so that once it is established that sharing existing masts without height increase is not possible, the siting of apparatus on existing masts (which could be raised in height) can be considered along with other structures. Criteria 1b will also be amended to replace the reference to 'trees' with 'other structures'.
- Criterion 1c will be amended to read 'an acceptable appearance in the landscape, including through camouflage as a natural or traditional feature'. Reference will be made to the Code of Best Practice 2013 and the updated Joint Accord between National Parks England (NPE) and the MOA.
- It is noted that it would not be possible to enforce a condition where land is not in control of the applicant and this would be taken into consideration in the determination of a planning application.
- In relation to the comment raised by Porlock PC, health and safety considerations are taken into account in any planning proposal.

Agreed actions

1. Amend clause 1.b) to include siting on existing masts (without the qualifier to state no increase in height) and include reference to 'other structures'.
2. Amend clause 1.c) to include the following 'an acceptable appearance in the landscape, including through camouflage as a natural or traditional feature'.
3. Provide updated references in the text to the 2013 Code of Best Practice and the Joint Accord between MOA and NPE.

Total number of responses to AC-D5	4
Total number of responses in support	1
Total number of responses in support subject to amendment	0
Total number of responses in objection	1
Total number of responses providing a general comment	2

AC-D6: Summary of Responses

Support

- Support received from Historic England.

Object

- Western Power Distribution (WPD) objected to policy AC-D5 as a policy which requires power lines to only go underground is considered to directly conflict with Western Power Distribution's legal obligations under the Electricity Act 1989. Whilst Western Power Distribution recognises the National Park's position with regard to environmental impact and their obligations under National Park legislation they request that the wording be changed to provide a more balanced policy which takes into account economic factors.

General Comments

- Western Power Distribution feel the wording in paragraph 10.65 is too strong and does not recognise the need to provide overhead lines where the cost of underground lines is prohibitive.
- WPD stated that The Electricity Act 1989 allows service lines at low voltage and 11kV to single dwellings to be overhead without planning permission so a condition on new development may not be enforceable.

Officer Comments and Recommendations

- Support from Historic England welcomed.
- This response does not clarify which section of the Electricity Act the policy may conflict with. Furthermore this Act predates the duty for statutory undertakers to have regard to National Park statutory purposes under section 62 of the Environment Act 1995. There are specific clauses in the policy which would allow for overhead lines where undergrounding would cause harm to the historic environment or biodiversity. Legal advice is that the S.62 of the Environment Act would take precedent and there are caveats in the policy (for reasons of biodiversity or historic environment) where undergrounding may not be suitable. Economic factors will be dealt with through the recharging of customers which electricity companies tend to do for connections to properties.
- Section 62 of the Environment Act 1995 provides that all statutory undertakers should have regard to National Park purposes and the wording of this paragraph is based on recognised guidelines for selecting routes for overhead lines and is accordance with National Park purposes.

Agreed actions

None required.

Total number of responses to AC-D6	1
Total number of responses in support	1
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	0

AC-D6: Summary of Responses

Support

- Support received from Historic England.

Officer Comments and Recommendations

- Support welcomed.

Agreed actions

None required.

Section 11: Exmoor's Settlements

Total number of responses to Section 11	25
Total number of responses in support	5
Total number of responses in support subject to amendment	0
Total number of responses in objection	3
Total number of responses providing a general comment	17

SETTLEMENT INFORMATION AND INSET MAPS

Total number of responses to Section 11 (excluding policies)³¹	19
Total number of responses in support	3
Total number of responses in support subject to amendment	0
Total number of responses in objection	2
Total number of responses providing a general comment	14

Section 11 (excluding policies): Summary of Responses

Support

- Historic England welcomed the identification and characterisation of the settlements in the section and asked whether appropriate conservation area appraisals and management plans were used to inform this work.
- The National Trust supported the inclusion of Dunster Castle in the Historic Settlement Core of Dunster in Inset Map 2.
- Porlock PC pleased to see the inclusion of Porlock Visitor Centre.

Object

- WSC objected to the absence of development limits/boundaries for any of the settlements that are identified in Table 4.1. An explanation as to the removal of the development limits from the new Local Plan should be included. If their removal is that the Local Planning Authority seek to regulate all future new development as an 'exception', this would suggest that the overall planning policy strategy for the National Park is one of no development. This would be contrary to the NPPF, which seeks to enable and promote development in sustainable locations.
- WSC reiterated their objection relating to the elevation of Dunster to a Local Service Centre (as stated within GP4 Spatial Strategy).

General Comments

- Porlock PC stated that the Porlock inset map needed to be amended showing the revised Conservation Area and a correction to the number of affordable homes provided.
- Nettlecombe PC questioned the notation on the inset maps.

³¹ Section 11 mainly provides an overview of all the settlements included in the spatial strategy and their respective inset maps (components of the Local Plan Policies Map).

- A respondent noted that the line of the dismantled Lynton & Barnstaple Railway needs to be changed to reflect the correct route.
- Correction required to the public transport availability in Dulverton.
- Dunster PC supports the objectives of the Local Plan and requested that the Authority supports the community of Dunster in achieving the aims of the Dunster Action Plan.
- Cutcombe PC raised a number of points:
 - Questioned the designation of Important Visual Amenity Land between Wheddon Cross and Cutcombe.
 - Highlighted an error with the inset map in relation to roads.
 - Questioned the status of Luckwell Bridge and whether a local affordable home could be built in this location.
 - Whether the Authority will financially support the provision of public conveniences.
- A respondent stated that the sports ground should be referenced in Exford and the need for a small number of affordable industrial units.
- The church at Simonsbath should be referenced as a public building used for public meetings and used for the Simonsbath Festival. The use of the Sawmill in Simonsbath was also questioned.
- Winsford PC highlighted some corrections to the facilities available in the village and questioned the landscape capacity of the village for further housing.
- A need to make consistently clear throughout the Local Plan that the 'capacity' for development identified in the Landscape Sensitivity Study is 'landscape capacity' only (Old Cleeve PC).
- The only figures quoted on the capacity of settlements for development in Table 11.2, they take on undue prominence. Given their limited scope they offer no meaningful representation of a settlement's overall capacity for development but they may be taken to indicate precisely this. Old Cleeve stated that the Authority might consider the removal of this table as the data is freely available in the published study itself on the Park's website.

Officer Comments and Recommendations

- Support welcomed from the National Trust and Historic England. Conservation Area Character Appraisals were used to inform the characterisation of those settlements with conservation areas.
- In the adopted Exmoor National Park Local Plan 2001 – 2011, only the Local Rural Centres have development boundaries (not the Villages). The development boundaries do not make a considerable difference to the policy approach and were carried forward from the 1997 Local Plan. The proposed approach in the Draft Local Plan is to have no development boundaries as the delivery of housing is based on a rural exception site approach within and adjoining the Local Service Centres and Villages across the National Park. This policy approach is consistent with National Park purposes and has been applied in the National Park since the adoption of the

2005 Local Plan with a good track record of affordable housing delivery in the National Park.

- The justification of the settlement hierarchy, including the status of Dunster, is explained in a supporting technical paper which has been subsequently produced as evidence to objectively assess the criteria used to define each settlement category within the settlement hierarchy and explain more fully the role and function of each category of settlement in relation to its context within the National Park settlement hierarchy and how this relates to neighbouring districts. The status of Dunster has been reviewed in relation to this technical paper and further discussed through the Duty to Cooperate and will be changed to a Village.
- The scheduled ancient monuments due to the scale of the Policies Map appear as dots rather than a dashed outline. The legend will be changed so this is clear.
- The line of the dismantled Lynton & Barnstaple Railway will be reviewed to ensure it is correct.
- In response to the points raised by Cutcombe PC:
 - Consultation on the designation of important visual amenity space took place at the YFE events (members of the community were asked to identify important green space). A question in the Draft Local Plan under Important Visual Amenity Space asked if people agreed with the designation of these areas. It is therefore considered that opportunities for challenging the designation of important visual amenity space were given during this consultation process on the draft Local Plan³².
 - Policy HC-D18 sets out what the Important Visual Amenity Space designation means in practical terms.
 - Roads: the mapping of roads on the Policies Map within the Exmoor Route Network will be reviewed.
 - Luckwell Bridge is classified as a hamlet within the open countryside where there are opportunities for new dwellings through the conversion of existing buildings (to local need affordable homes or extended family dwellings) and subdivision of existing dwellings. Opportunities for new build exist through policies for rural worker dwellings and succession farm dwellings.
- The Dunster Action Plan is referenced in this section. The Exmoor National Park Partnership Plan 2012-2017 provides action C1.1 which states to work with Parish and Town Councils and local communities to identify priorities that can be supported through the planning process and community led planning and this is reinforced by policy ES-S1.
- Whilst Exford has a number of thriving businesses, and policies support the improvement of employment prospects within Villages, it is considered that there should be clear evidence of need for developing this type of employment space at Exford. A number of industrial units have been developed nearby at Cutcombe

³² Cutcombe PC when subsequently consulted on this designation were not supportive and it will be removed from the inset map for Cutcombe and Wheddon Cross – see comments under policy ES-D2.

Market. Any proposal for development should be the subject of a planning application.

- It is not considered appropriate for the Local Plan to include management of the National Park Authority buildings (i.e. the Sawmill). A project addressing how to look after and make the most of Simonsbath’s unique heritage (including the Sawmill) is underway.
- The landscape capacity for new build dwellings in Winsford is set out in the Exmoor National Park Landscape Sensitivity Study.
- Table 11.2 and its categories will be reviewed as part of the justification of the settlement hierarchy in a supporting technical paper which has been produced as evidence to objectively assess the settlement hierarchy (this will also include the information included within Table 11.1).

Agreed actions

1. The preparation of a Technical Paper to support the settlement hierarchy within the spatial strategy and review the status of the settlements, has resulted in a change to the status of Dunster to a Village, this has been agreed through the Duty to Cooperate. The Plan will be amended accordingly.
2. Change the Conservation Area boundary for the Porlock inset map.
3. Change the legend for scheduled monuments.
4. Correct the line of the dismantled Lynton & Barnstaple Railway on the Policies (Proposals) Map for Parracombe.
5. Review the road classification used on the Policies Map.
6. Amend text in relation to comments raised by respondents in relation to their towns and villages.
7. Remove Tables 11.1 and 11.2 (including paragraphs 11.220 – 11.225) within the Local Plan and include the relevant information in a supporting Technical Paper for the settlement hierarchy.

SETTLEMENT POLICIES

Total number of responses to ES-S1 Supporting Local Communities	0
Total number of responses in support	0
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	0

ES-S1: Summary of Responses

No comments received.

Officer Comments and Recommendations

None required.

Agreed actions

None required.

Total number of responses to ES-S2 Lynton & Lynmouth Neighbourhood Plan	3
Total number of responses in support	2
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	1

ES-S2: Summary of Responses

Support

- NDC supported the policy and noted that it was important to ensure that any proposals will not have adverse cross-boundary impacts. The Lyn Plan was supported in taking priority over the Local Plan should a conflict arise between policies.

General Comments

- The Home Builders Federation (HBF) stated that further consideration should be given to proposals under policy ES- S2 Lynton and Lynmouth Neighbourhood Plan to ensure that there is no over-ruling of the strategic policies of the Local Plan.

Officer Comments and Recommendations

- Support from NDC welcomed.
- In response to the comment from the HBF, the Authority considers that Policy ES-S2 provides clarity to the position on strategic policies in the Local Plan and the Neighbourhood Plan policies.

Agreed actions

None required.

Total number of responses to ES-D1 Dulverton Community Safeguarding Area	0
Total number of responses in support	0
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	0

ES-D1: Summary of Responses

No responses received.

Officer Comments and Recommendations

None required.

Agreed actions

None required.

Total number of responses to ES-D2 Cutcombe & Wheddon Cross Community Safeguarding Area	2
Total number of responses in support	0
Total number of responses in support subject to amendment	0
Total number of responses in objection	1
Total number of responses providing a general comment	1

ES-D2: Summary of Responses

Object

- The landowner stated that there should be no reason for the School Field at Wheddon Cross (that is already safeguarded for the community on part of the field) to be also identified as an Important Visual Amenity Space (YFE)³³ and given higher protection than any other piece of land in or around Cutcombe or Wheddon Cross. The land is used as agricultural land at present there is no desire at the current time to change that. Questioned why the land should be of higher status as any development would require planning permission before such action.

General Comments

- Cutcombe PC wanted clarification of the word ‘allocated’ as the land to the rear of the school is safeguarded for an extension to the school site but is not owned by the school.

Officer Comments and Recommendations

- This area of land (adjacent to the community safeguarding area referred to in policy ES-D2) was identified at the Your Future Exmoor community consultation events as ‘important green space’. Such areas have been assessed in relation to certain criteria for Important Visual Amenity Space – set out in the supporting text to policy HC-D18 in the Draft Local Plan. Further consultation with the Parish Council has clarified that this area should not be designated as Important Visual Amenity Space and the Policies Inset Map for Cutcombe and Wheddon Cross will be amended accordingly.
- This policy is carried forward from the existing Local Plan and the policy wording remains the same. The School was consulted and wished to retain this designation. The term ‘allocated’ will be replaced with ‘safeguarded’ to be consistent with the policy title.

Agreed actions

1. Remove the Important Visual Amenity Space (YFE) designation from the Cutcombe and Wheddon Cross inset map.
2. The word ‘allocated’ will be replaced with ‘safeguarded’ (policies ES-D1 and ES-D2).

³³ Important Visual Amenity Space identified at the Your Future Exmoor events held during 2010

Section 12: Annex 1: The Conduct of Archaeological Work and Historic Building Recording

Total number of responses to Section 12	2
Total number of responses in support	2
Total number of responses in support subject to amendment	0
Total number of responses in objection	0
Total number of responses providing a general comment	0

Summary of Responses

- Support received from Historic England as part of the fundamental strategy for the historic environment.
- SCC support the opportunity to minimise impact of some development at the pre-application stage.
-

Officer Comments and Recommendations

Support welcomed from Historic England and SCC.

Agreed actions

No actions necessary.

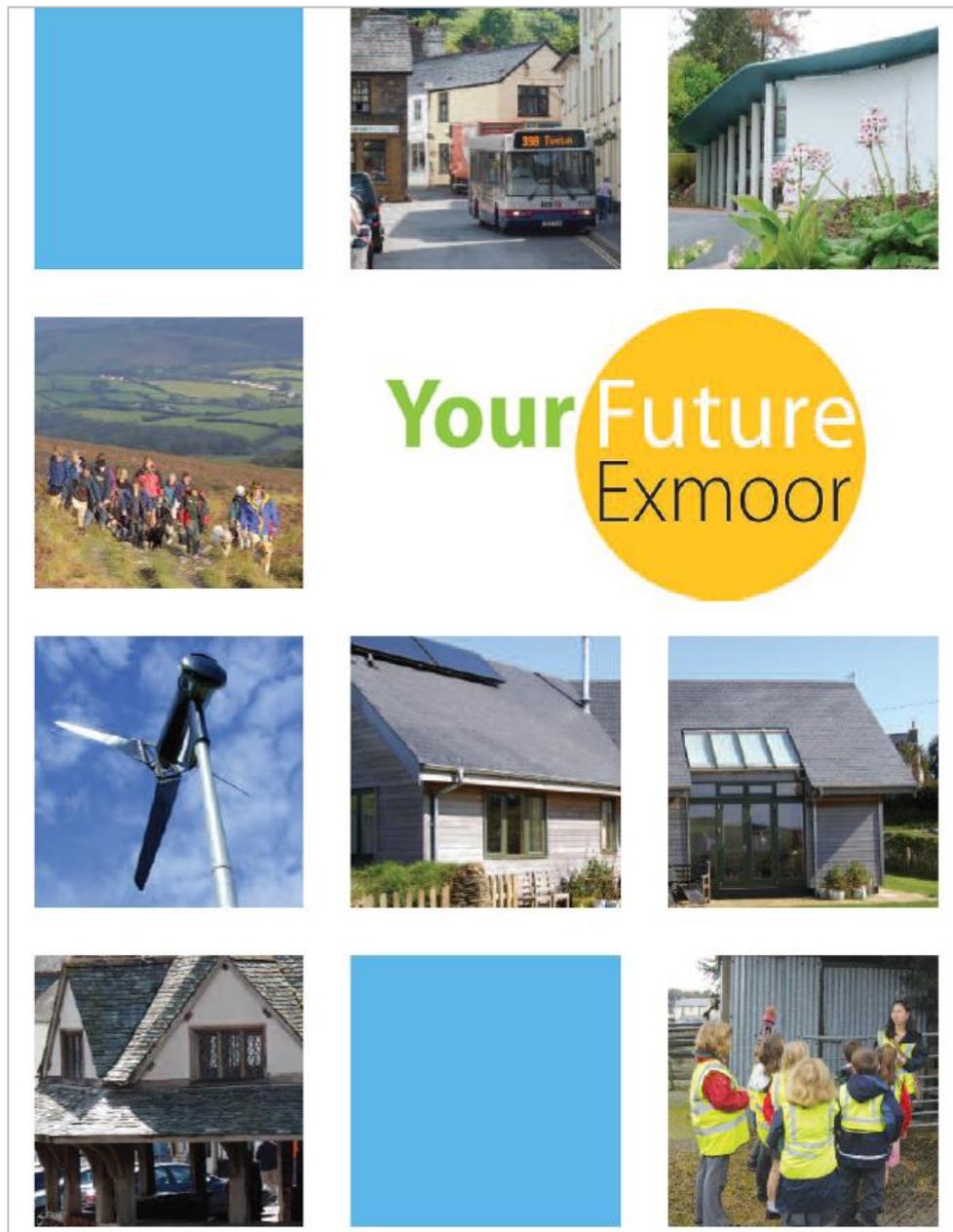
Section 13: Annex 2: Rural Land Based Worker Dwellings

5.6 No comments were received on this section of the Draft Local Plan.

6 Appendix 1: Your Future Exmoor early engagement

Examples of posters, leaflets, parish newsletters, press releases, other publicity

Your Future Exmoor (YFE) Leaflet (November 2009) – front page showing the YFE logo.



Centre pages:



Get Involved And Have Your Say!

We want to know how you would like to see your community evolve in the future and how we can work together to achieve this. A series of events are to be held in villages and towns across Exmoor.



Farm Shop, Dulverton

This is a real opportunity for communities to contribute towards the new planning document for Exmoor National Park called 'Your Future Exmoor' and help decide important issues such as where new housing and business development should be provided over the next 15-20 years.

The events are intended to gather views on the matters and issues important to you. They will be tailored to individual parishes. You can also share your views by completing the questionnaire in the November edition of Park Life this can be found at:

www.exmoor-nationalpark.gov.uk/consultations



Westcott Mead, Exford

We have also been working with children at the First Schools and Primary Schools within the National Park. Details of their ideas and work will be displayed at the community events for everyone to see.

The outcome of each of these consultation events will be made available and will include comments and responses from those unable to attend. We will be sending copies of the feedback reports to parish councils and publishing them on the National Park Authority website. There will then be further opportunities for people to participate and comment on the new planning document as it develops through to the final published plan.

Following the community events, a number of group discussions in relation to specific issues will be held; which you can sign up to at the parish events so that we can ensure we have a wide cross-section of views.

If you have any queries regarding the community events or wish to attend one of the discussion groups, please let us know by phoning the Policy & Community Team on 01398 323665, or email via: ldf@exmoor-nationalpark.gov.uk.

There will be an event for each of the parishes with towns and villages in the National Park. For some Exmoor villages an event will be held either for part of the afternoon and early evening or there may be two 'replica events' held in neighbouring parishes at different times of the day to enable people to attend in one of the parishes at a time convenient for them. Please see the timetable on the back for your nearest event.



Youth Consultation, Lynton

Rear page showing list of community events:

Provisional Community Consultation Dates

Venue	2010	Time
January		
*Cutcombe - Moorland Hall	Monday 18 th	3.00 - 7.00pm
Dulverton Town Hall	Thursday 21 st	2.00 - 7.00pm
*Parracombe Village Hall	Monday 25 th	3.00 - 7.00pm
Lynton - United Reform Church Hall	Thursday 28 th	2.00 - 7.00pm
Brompton Regis Village Hall	Monday 1 st	3.00 - 7.00pm
February		
Porlock Village Hall	Monday 8 th	2.00 - 7.00pm
Bridgetown Village Hall	Thursday 11 th	12.00 - 4.00pm
*Winsford Village Hall	Thursday 11 th	2.45 - 6.45pm
Wootton Courtenay Village Hall	Monday 22 nd	3.00 - 7.00pm
Timberscombe Village Hall	Thursday 25 th	12.00 - 4.00pm
Dunster Tithe Barn	Thursday 25 th	3.00 - 7.00pm
March		
Brendon Village Hall	Monday 1 st	3.00 - 7.00pm
Monksilver - EMN Village Hall	Thursday 4 th	3.00 - 7.00pm
Luccombe Village Hall	Thursday 11 th	12.00 - 4.00pm
Allerford Community Hall	Thursday 11 th	3.00 - 7.00pm
Withypool Village Hall	Thursday 18 th	12.00 - 4.00pm
Exford Memorial Hall	Thursday 18 th	3.00 - 7.00pm
Challacombe Methodist Hall	Thursday 25 th	12.00 - 4.00pm
*Simonsbath - Exmoor Forest Inn	Thursday 25 th	3.00 - 7.00pm
Luxborough Village Hall	Monday 29 th	12.00 - 4.00pm
Roadwater Village Hall	Monday 29 th	3.00 - 7.00pm

NB Confirmed dates are marked with a * (as of 3/11/09).

YFE event poster for Parracombe:



Your Future Exmoor

Get involved and have your say!

This is your chance to come to your event, tell us what you think and to influence planning in the National Park. This will help decide important issues such as where new housing and employment should be provided over the next 15-20 years.

Your event will be:

Monday
25 January 2010
3pm-7pm
Parracombe Village Hall
(for the parishes of Parracombe, Martinhoe, Trentishoe, Combe Martin and Kentisbury)

www.exmoor-nationalpark.gov.uk/ldf

Example of an issues and options board displayed at the YFE events:

i **Current Access to Local Needs Affordable Housing**
 To move into a local needs affordable home a person currently needs to:

1. **Have a local connection** which means:
 - a. having lived in the parish or an adjoining parish continuously for 10 years in the last 20 years, or
 - b. needing to live close to another person for age or medical reasons who has lived in the parish (or adjoining parish) for 10 years continuously in the last 20 years, or
 - c. needing to live close to their place of work in the parish (or adjoining parish) - work of value to the National Park and communities.AND
2. **Be in housing need** (decided by the Housing Authority - North Devon or West Somerset Councils - and Housing Associations).AND
3. **Be unable to afford to rent or buy accommodation** in the area.

This approach helps to keep the owner-occupied homes affordable by reducing land values. If these criteria are weakened it is likely that more people will qualify to buy and the land value may increase (i.e. reducing future affordability and availability of sites).

QUESTIONS

(i) How long do you think people should need to have lived locally to occupy new affordable housing?

	Agree 	Comment 
5-9 years		
As now, 10 or more years		
At least 15 years		

(ii) What local area do you think people should have lived in to occupy new affordable housing in your parish?

	Agree 	Comment 
Your parish only		
As now, your parish and/or its adjoining parishes		
The area of North Devon OR West Somerset within the National Park		
Anywhere within the National Park		

(iii) Please give us your views on the types of workers who should qualify for affordable housing on Exmoor: 

Photographs of the YFE events:



Brompton Regis



Dulverton

Letter inviting neighbouring local authorities, local police, and registered providers to attend YFE events.

Fit one full page to window



Exmoor National Park Authority
Exmoor House, Dulverton
Somerset TA22 9HL
Tel: (01398) 323665 Fax: (01398) 323150
www.exmoor-nationalpark.gov.uk
E-mail: ldf@exmoor-nationalpark.gov.uk

23 December 2009

Dear Sir/Madam,

**'YOUR FUTURE EXMOOR' COMMUNITY CONSULTATION EVENTS
EXMOOR NATIONAL PARK LOCAL DEVELOPMENT FRAMEWORK**

You are invited to attend a series of interactive community consultation events to be held throughout Exmoor National Park between January and March 2010.

The events will be a 'drop in' format and are designed to gather the local communities' views to inform the preparation of a Local Development Framework for the National Park. The Local Development Framework will be a collection of planning documents replacing the 2005 Local Plan, covering a wide range of topics including the natural and cultural environment, housing, employment, transport and climate change.

We would very much welcome your attendance as an opportunity for you to engage with Exmoor's communities and also to enable people to get information and ask questions of you directly. The reply slip includes the full list of dates – you are invited to come to all those you feel would be useful. We would be grateful if you can return the enclosed reply form to us by 11 January 2010, or simply email me the event(s) and times you are attending. Alternatively, please feel free to forward this invitation on to an appropriate colleague.

We hope to see you at one of our events. If you have any queries please do not hesitate to contact me on 01398 322 258.

Yours sincerely,

**POIE-YEE LI
ASSISTANT PLANNING POLICY OFFICER**



Dear Resident

A series of events are being held in villages and towns across Exmoor. This is a real opportunity for you to contribute towards the new planning document called "Your Future Exmoor" which will help decide important issues such as where new housing and employment should be provided over the next 15-20 years.

Your nearest event will be on:

Thursday 28th January 2010
2pm-7pm
United Reform Church Hall, Lynton
 (for Lynton & Lynmouth Parish)

www.exmoor-nationalpark.gov.uk/ldf



An example of postcard reminders to local residents



Get Involved and Have Your Say!

We want to know how you would like to see your community evolve in the future and how we can work together to achieve this. This is your chance to have your say and to contribute towards the new planning document for Exmoor National Park called 'Your Future Exmoor' which will help decide important issues such as where new housing and employment should be provided over the next 15 – 20 years.

A series of drop in events are to be held in Lynton, Brendon and Parracombe. Your nearest events will be:

AT: Parracombe Village Hall (for Parracombe, Martinhoe, Trentishoe, Kentisbury and Combe Martin parishes)
WHEN: 3.00pm – 7.00pm
 Monday 25th January

AT: Lynton United Reform Church Hall (for Lynton and Lynmouth parish)
WHEN: 2.00pm – 7.00pm
 Thursday 28th January

AT: Brendon Village Hall (for Brendon & Countisbury and Oare parishes)
WHEN: 3.00pm – 7.00pm
 Monday 1st March

The events will be very informal with a chance to come along and give your views and ideas. Refreshments will be provided and there will be a children's corner with activities!

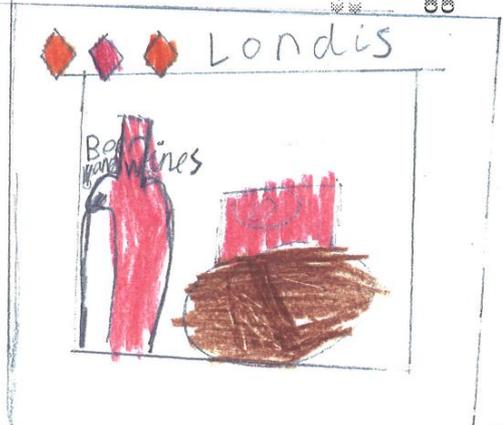
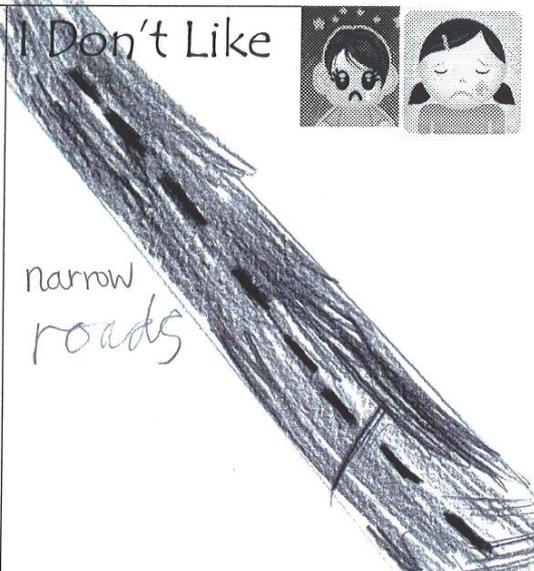
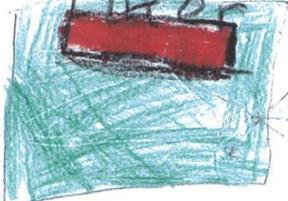
Details regarding further events can be found at:
www.exmoor-nationalpark.gov.uk/ldf

If you require any further information contact Tessa Saunders or Emily Rubin in the Policy & Community Team
 Tel: 01398 323665
 E-mail: ldf@exmoor-nationalpark.gov.uk

Article for the Lyn Valley News parish magazine

Youth Consultations

- Picture template for First Schools and Primary Schools

<h2>I ATTEND CUTCOMBE FIRST SCHOOL</h2>	
My Name is <i>Chloe</i>	I Live in <i>Cutcombe</i>
<h2>IN CUTCOMBE/WHEDDON CROSS</h2>	
I Like  	I Don't Like   narrow roads
I would like to see around about in  play ground	No dog bowling in this area.  dog poo bins.
more litter bins. 	more swimming pools 

Completed drawings – informed a feedback report sent to the school and published on the National Park website. The drawings were also displayed at locally held YFE events

Images of school workshops exploring their community:



Parracombe Primary School



St Dubricius First School - Porlock

7 Appendix 2: Draft Local Plan Publicity

A leaflet was produced to encourage people to respond to the Draft Local Plan consultation (4 November to 13 December 2013). The leaflets were distributed to Local Information Points, libraries, National Park Centres, local schools, shops and businesses together with a poster publicising the consultation.



Exmoor National Park Draft Local Plan Consultation



The Draft Local Plan for Exmoor is out for consultation from 4th November 2013 to 13th December 2013.

The Plan seeks to address the social and economic needs of Exmoor's communities whilst conserving and enhancing Exmoor's high quality environment. The Plan provides policies for development and use of the land, and indicates what kind of development will and will not be permitted in planning applications.

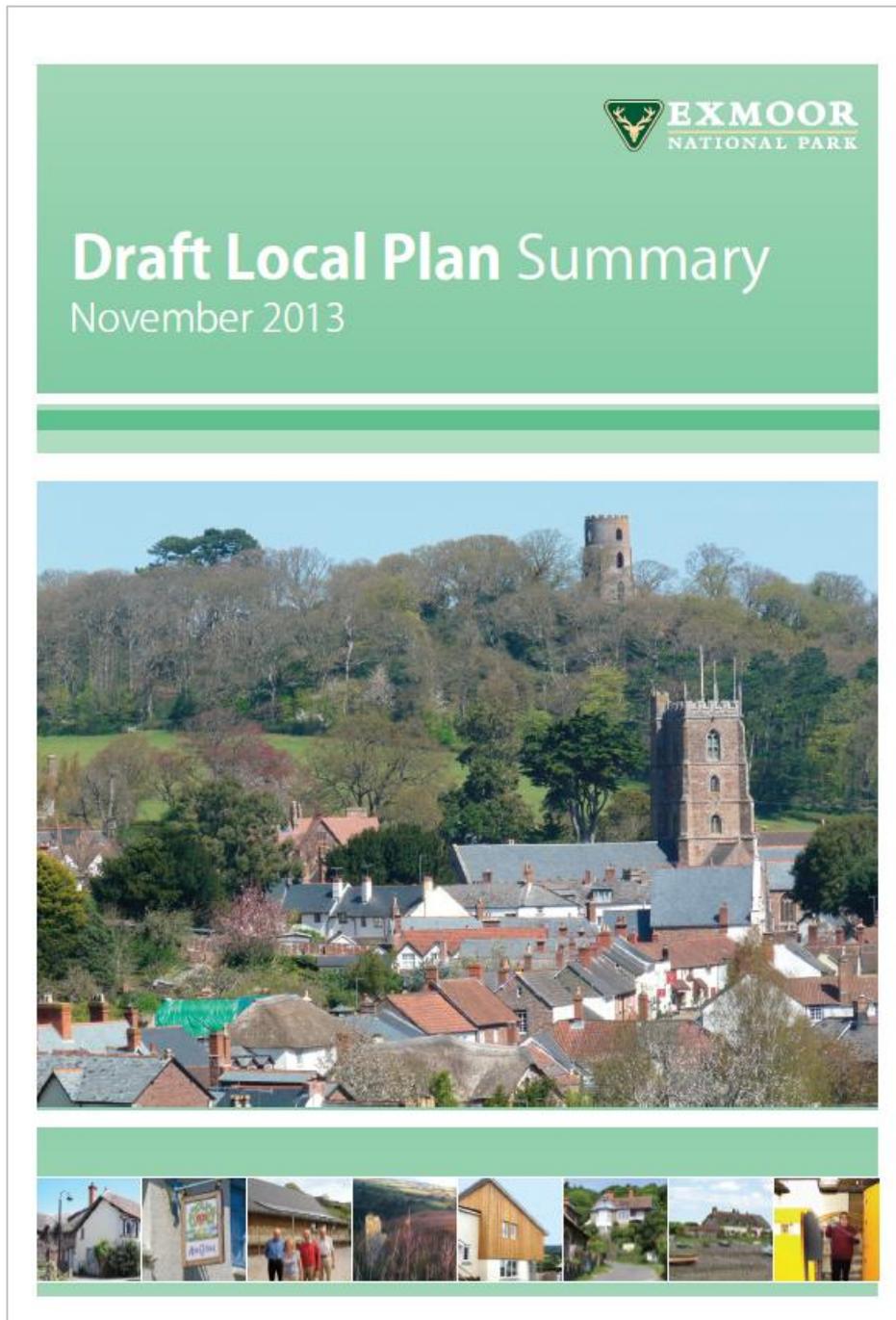
Highlighted are some of the issues which may affect you, as a resident, landowner, business or visitor to Exmoor. We welcome your thoughts and comments on the Plan.

Please note that the information contained in this leaflet is a summary and there are detailed criteria in each policy.

A 32 page A5 summary guide to the Local Plan policies was also distributed to Parish Councils together with full copies of the Local Plan and CDs with the full range of consultation documents including Sustainability Appraisal, Habitats Regulations Assessment and response forms.

Summary guides and posters were also:

- sent to Local Information Points, libraries and National Park Centres; and
- made available at the parish meetings held at Roadwater, Lynton, Porlock, Winsford and the Parish & Consultative Forum at Dulverton.



Email sent to consultees

Tessa Saunders

From: Tessa Saunders
Sent: 04 November 2013 09:07
To: localplan
Subject: Draft Exmoor National Park Local Plan Consultation

Dear Consultee

Exmoor National Park Authority has prepared the Exmoor National Park Draft Local Plan following detailed evidence gathering, including extensive consultation with local communities and organisations. The Local Plan sets out policies that will be used to determine planning applications for future development within the National Park; helping to shape Exmoor over the long term. It includes policies to:

- help support businesses and communities;
- assist in providing local needs affordable housing,
- respond to the challenges of climate change,
- encourage access to the broadband and telecommunications network, and
- conserve and enhance Exmoor's environment.

Views on the Draft Exmoor National Park Local Plan are invited between **4 November and 13 December 2013**. The Plan can be downloaded from the Authority's website at www.exmoor-nationalpark.gov.uk or there are reference copies available at the following locations:

- Exmoor National Park Authority Offices at Exmoor House, Dulverton;
- North Devon District Council Offices, Civic Centre, Barnstaple; and
- West Somerset District Council Offices, West Somerset House, Killick Way, Williton.
- Dulverton, Dunster and Lynmouth National Park Centres
- Libraries at: Taunton, Minehead, Bampton, Dulverton, South Molton, Porlock, Lynton and Combe Martin

A response form is available to download from our website. Please send your comments to us in writing or by email by **Friday 13 December 2013**. If you have any further queries, please do not hesitate to contact us on 01398 323665 or email localplan@exmoor-nationalpark.gov.uk

Kind regards

Tessa Saunders
Planning Policy Officer

Exmoor National Park Authority
Exmoor House, Dulverton, Somerset, TA22 9HL
Tel: 01398 323665
Direct Line: 01398 322246
Fax: 01398 323150

Visit Our Website at <http://www.exmoor-nationalpark.gov.uk>

'Enhancing the qualities that make Exmoor special'

Letter to Parish Councils to invite councillors to a consultation meeting:



Exmoor National Park Authority
Exmoor House, Dulverton
Somerset TA22 9HL
Tel: (01398) 323665 Fax: (01398) 323150
www.exmoor-nationalpark.gov.uk
E-mail: info@exmoor-nationalpark.gov.uk

8 October 2013

Dear Parish Clerk

Draft Exmoor Local Plan Consultation

We warmly welcome you and your Councillors to discuss the Draft Exmoor Local Plan at any one of our forthcoming consultation meetings in November. This is your opportunity, before the Plan is implemented in practice, to have your say on policies which provide for development and use of the land and indicate what kind of development will be permitted in planning applications in Exmoor National Park.

The Draft Local Plan is an important Plan that will help shape Exmoor for the years to come and can affect you as a resident, landowner, business or visitor to Exmoor. The Plan provides policies on a wide range of issues including a continued focus on affordable housing, support for business and communities, responding to the challenges of climate change, encouraging access to broadband and telecommunications, and conserving and enhancing Exmoor.

A large amount of consultation, including the Your Future Exmoor events, has gone into shaping the policies, and policies have been reviewed and changed where considered appropriate. The consultation meetings will provide an opportunity to discuss how the policies will apply across all areas of Exmoor as well as those proposals that may affect individual Parish areas. The meetings will also look at new policies and changes to existing policies that have been made as a result of consultation, evidence or government policy. This will be important to you as a Parish Council when considering planning proposals in your Parish.

The Plan is out for consultation from 4 November to 13 December. Meetings with Parish Councillors will be held throughout November and the table below shows the location, dates and times of these meetings. We have tried to avoid local Parish Meetings as much as possible but appreciate that there may be some clashes, which is why we have arranged a series of meetings.

Location	Date	Time
Roadwater Village Hall	Monday 11 November	6.30pm for 7pm – 8.30pm
Lynton and Lynmouth Town Hall (Main Hall)	Wednesday 13 November	6.30pm for 7pm – 8.30pm
Porlock Village Hall (Small Hall)	Monday 18 November	6.30pm for 7pm – 8.30pm
Parish and Consultative Forum Exmoor House, Dulverton	Thursday 21 November	10.30am – 1pm
Winsford Village Hall	Tuesday 26 November	6.30pm for 7pm – 8.30pm



All Parish Councillors and Clerks are very welcome to attend one or more of the events. To help with an estimate of how many people are coming to each event, it would be helpful if you could indicate numbers for each of the events below, and respond to us by email, phone or post. However, if you still wish to attend an event and have not contacted us, you would still be very welcome.

Copies of the Draft Local Plan will be available from your Parish Council from 4 November, and will also be displayed at Local Information Points, National Park Centres and libraries. Each Parish Councillor will receive a Summary and Leaflet about the Draft Local Plan.

If you have any further queries please do not hesitate to contact us.

Yours sincerely

Richard Edgell

David Wyborn

Chair of Planning Committee

Head of Planning and Sustainable Development

Parish/Town Council

Please indicate numbers wishing to attend each event:

Roadwater Village Hall	<input type="checkbox"/>	Lynton and Lynmouth	<input type="checkbox"/>
Porlock	<input type="checkbox"/>	Winsford	<input type="checkbox"/>
Parish & Consultative Forum	<input type="checkbox"/>		

Please return to Ellie Woodcock by Monday 4 November:

Email: ewoodcock@exmoor-nationalpark.gov.uk

Telephone: 01398 322231

Address: Exmoor National Park Authority, Exmoor House, Dulverton, TA22 9HL



List of deposit points for the Exmoor National Park Draft Local Plan (November 2013):

- Exmoor National Park Authority reception, Exmoor House, Dulverton
- North Devon Council reception, Civic Centre, Barnstaple
- West Somerset Council reception, West Somerset House, Williton
- National Park Centres:
 - Dulverton
 - Lynmouth
 - Dunster
- Local libraries within and around the National Park at:
 - Williton
 - Bampton
 - South Molton
 - Porlock
 - Dulverton
 - Taunton
 - Minehead
 - Lynton
 - Combe Martin

A Draft Local Plan was also sent to each Parish Council within/partly within the National Park and one parish adjoining.

8 Appendix 3: Supporting Documents

- 8.1 The Local Plan Consultation Database maintains a record of all consultees and respondents to the Local Plan. This data is maintained having regard to the Data Protection Act 1998, some people request their information to be included on the database, whilst other specific and general consultation bodies are directly contacted as a requirement of the Town and Country Planning (Local Plan) (England) Regulations 2012.
- 8.2 The following documents also support the Consultation Statement 2015 and can be found on the National Park website www.exmoor-nationalpark.gov.uk
 - a. Statement of Community Involvement 2006
 - b. Draft Statement of Community Involvement 2015
 - c. Your Future Exmoor - Issues and Options Consultation – full feedback report
 - d. Your Future Exmoor – Youth Consultation – feedback reports
 - e. Exmoor National Park Local Plan Consultation: Vision & Objectives, General Policies, and strategic options for housing and spatial strategy.
 - f. Draft Local Plan Consultation – Schedule of Responses

9 Glossary

CCMA	Coastal Change Management Area
CIL	Community Infrastructure Levy
DCC	Devon County Council
EA	Environment Agency
GESA	Greater Exmoor Shoots Association
HBF	Home Builders Federation
HE	Historic England
IDP	Infrastructure Delivery Plan
L&BRT	Lynton and Barnstaple Railway Trust
LDO	Local Development Order
MOA	Mobile Operators Association
NDC	North Devon Council
NFU	National Farmers Union
NPE	National Parks England
NPPF	National Planning Policy Framework
OAN	Objectively Assessed Need
PC	Parish Council
PM10	Particulate Matter (up to 10 microns in size)
PV	Photo Voltaic
SCC	Somerset County Council
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SMP	Shoreline Management Plan
South West HARP	South West Housing Associations and Registered Providers
TCE	The Crown Estate
WSC	West Somerset Council
YFE	Your Future Exmoor