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19 November 2026

EXMOOR NATIONAL PARK AUTHORITY
PLANNING COMMITTEE

To: The Members of the PLANNING COMMITTEE of the Exmoor National Park Authority

A meeting of the Planning Committee will be held in the **Committee Room, Exmoor House, Dulverton** on **Tuesday, 1 December 2026 at 2.30pm.**

The meeting will be open to the press and public subject to the passing of any resolution under s.100(A)(4) of the Local Government Act 1972.

There is Public Speaking at this meeting, when the Chairperson will allow members of the public two minutes each to ask questions, make statements, or present a petition relating to any item on the Agenda. Anyone wishing to ask questions should notify the Democratic Support Officer as soon as possible, or at the latest by 4pm on the working day before the meeting of the agenda item on which they wish to speak, indicating a brief summary of the matter or matters to be raised (contact Committees@exmoor-nationalpark.gov.uk).

The meeting will be **recorded**. By entering the Authority's Committee Room and speaking during Public Speaking you are consenting to being recorded. We will make the recording available via our website for members of the public to listen to and/or view, within 72 hours of the meeting taking place.

Members of the public may use forms of social media to report on proceedings at this meeting. Anyone wishing to film part or all of the proceedings may do so unless the press and public are excluded for that part of the meeting or there is good reason not to do so. As a matter of courtesy, anyone wishing to film proceedings is asked to advise the Chairperson so that those present may be made aware.

(The agenda and papers for this meeting can be downloaded from the National Park Authority's website www.exmoor-nationalpark.gov.uk).



Sarah Bryan
Chief Executive

As set out above, the Authority welcomes public engagement with its work and believes that everyone attending a meeting of Exmoor National Park Authority or one of its Committees has the right to be treated with respect and to feel safe at all times, including before, during and after the meeting they attend.

The Authority understands that some situations can be difficult and lead to frustration; however, the Authority is committed to promoting an environment where everyone feels listened to and respected and is not subjected to unacceptable behaviour. Further guidance is provided in our Customer Notice, available on our website.

A G E N D A

1. Apologies for Absence

2. Declarations of Interest/Lobbying of Members/Unaccompanied Site Visits

Members are asked to declare:

(1) any interests they may have in relation to items on the agenda for this meeting;

(2) any lobbying by anyone concerned with a planning application and any unaccompanied site visits where contact has been made with any person concerned with a planning application.

3. Minutes

(1) To approve as a correct record the Minutes of the meeting of the Planning Committee held on 3 November 2026 (Item 3)

(2) To consider any Matters Arising from those Minutes.

4. Business of Urgency: To introduce any business which by reason of special circumstances the Chairperson, after consultation with the Chief Executive, is of the opinion should be considered as a matter of urgency and to resolve when such business should be ordered on the Agenda.

5. Public Speaking: The Chairperson will allow members of the public to ask questions, make statements, or present a petition on any matter on the Agenda for this meeting or in relation to any item relevant to the business of the Planning Committee. Any questions specific to an agenda item can be posed when that item is considered subject to the discretion of the person presiding at the meeting.

6. Appeal Decisions:

6.1 To note the decision of the Secretary of State in relation to the appeal for: White Rose Cottage, Queen Street, Lynton, EX35 6AA – ref: 6010935 (Item 6.1)

7. Development Management: To consider the report of the Head of Climate, Nature & Communities on the following:

Agenda Item	Application No.	Description	Page Nos.
7.1	EXM/26/041/FULL	Proposed conversion of the Grade II listed Former Dulverton laundry building into residential accommodation consisting of 6no 3-bed apartments in the main mill building; 2no 1-bed Cottages in the former boiler house and 1no. 2-bed Cottage in the former workshop – The Laundry, 8 Chapel Street, Dulverton, TA22 9HF	1 – 61

7.2	EXM/26/042/LBC	Listed building consent for the proposed conversion of the Grade II listed Former Dulverton laundry building into residential accommodation consisting of 6no 3-bed apartments in the main mill building; 2no 1-bed Cottages in the former boiler house and 1no. 2-bed Cottage in the former workshop - The Laundry, 8 Chapel Street, Dulverton, TA22 9HF	1 - 25

8. **Exmoor National Park Local Plan:** To consider the report of the Head of Climate, Nature & Communities (Item 8)

9. **Application Decisions Delegated to the Chief Executive**: To note the applications determined by the Chief Executive under delegated powers (Item 9)

10. **Site Visits**: To arrange any site visits agreed by the Committee (the next reserve date being Friday, 29 January 2027 (am)

Further information on any of the reports can be obtained by contacting the National Park Authority at the address and telephone numbers at the top of the agenda. Details of the decisions taken at this meeting will be set out in the formal Minutes which the Committee will be asked to approve as a correct record at its next meeting. In the meantime, details of the decisions can be obtained by emailing Committees@exmoor-nationalpark.gov.uk

Exmoor National Park Authority
Planning Committee
1 December 2026
Agenda Item 3

Minutes of the Planning Committee meeting held on Tuesday, 3 November 2026 at 1.30 pm in the Committee Room, Exmoor House, Dulverton

Present

Mr S J Pugsley (Chairperson)
Dr M Kelly (Deputy Chairperson)
Mr A Bray
Mr M Ellicott
Mr W Geen
Mr R Hopley
Mr M Kravis
Mrs F Nicholson
Mr J Patrinos
Mrs F Smith
Miss L Williams

In attendance:
The Chairperson welcomed Mr G Wren, Member of the Authority

44. Apologies for absence

Mr T Butt-Philip (substitute Mr M Kravis), Mr J Holtom (substitute Mr M Ellicott)

45. Declarations of interest / Lobbying of Members / Unaccompanied site visits

As the applicant for Item 6.1, Mr J Holtom had declared a conflict of interest and was absent from the meeting.

46. Minutes

Confirmation: The Minutes of the Authority's meeting on 6 October 2026 were agreed and signed as a correct record with one edit required. Officers would clarify and revise minute #40 (item 7.2), penultimate paragraph, to show Members had raised a query on whether the applicant had considered a proposal for a mobile home, and would require a separate discussion.

Matters arising: None.

47. Business of urgency:

There were none.

48. Public Speaking

There were none.

Development Management

49. Application No: EXM/26/148/FULL
Location: Little Close, Parracombe, Barnstaple, EX31 4QJ
Proposal: Proposed installation of 16no. ground mounted solar panels, together with associated works.

The Committee considered the report of the Head of Climate, Nature and Communities

The Committee's consideration

Officers presented the proposed application to the Committee, as the applicant was a Member of the Committee. The application site straddles the boundary of the Parracombe Conservation Area. Holwell Castle Scheduled Monument lies to the south and the field of the application site is recorded on the Exmoor National Park Historic Environment Record as an area of medieval or post-medieval ridge and furrow earthworks.

16 solar panels were proposed to be located at the edge of the field adjoining the rear garden, sitting at 1.9metres above ground level with a length of approximately 14.4 metres, adjacent to the existing boundary hedge. Officers highlighted the site plans detailing proposed planting near the public footpath crossing the field to soften the viewpoint from the footpath.

Members welcomed the addition of planting to reduce the visual impact to an acceptable level and recommended the application for approval.

Resolved:

To GRANT planning permission subject to the conditions set out in the report.

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50. Application decisions delegated to the Chief Executive

The Planning Committee noted the decisions of the Chief Executive determined under delegated powers.

51. Site Visits

The potential for a site visit before the December Planning Committee was raised.

52. Any Other Business

In October an Agents forum was held with planning officers and local planning agents who engage with the Authority, these take place twice annually. They are a good opportunity to explore any issues, concerns or common interest. The Chairman congratulated the officers and their team for this beneficial activity enabling a smoother operation of the planning system.

The meeting closed at 1.50pm

(Chairperson)

Planning Inspectorate

Appeal Decision

Site visit made on 2 September 2026

by S McIntyre BSc (Hons), CEng, MICE, MCIHT

an Inspector appointed by the Secretary of State

Decision date: 3 November 2026

Appeal Ref: 6010935
White Rose Cottage, Queen Street, Lynton EX35 6AA

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
- The appeal is made by Mr & Mrs Graham against the decision of Exmoor National Park Authority.
- The application Ref is EXM/26/062/FULL.
- The development proposed is a roof garden on existing flat roof.

Decision

1. The appeal is dismissed.

Preliminary Matters

2. The description of development in the banner heading above has been revised from that provided in the application form to remove wording that does not describe an act of development.

3. The development has been constructed, which I was able to view on my site visit, however the appeal has been decided on the basis of the submitted plan.

4. A revised National Planning Policy Framework (the Framework) was published on 17 August 2026, and the appellants and the Authority were invited to consider whether the revised Framework had relevance to their case, and I have considered submissions received.

Main Issues

5. The main issues are:

   - whether or not the proposal would preserve or enhance the character or appearance of the host dwelling and the contribution it makes to the Lynton Conservation Area (the CA), and having regard to the purposes of the Exmoor National Park (the NP); and

   - the effect of the development on the living conditions of occupants of neighbouring properties, with regard to privacy and noise.

Reasons

Character and appearance

6. The site is located in the Lynton Conservation Area (the CA) and I have a duty under section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (the Act) to pay special attention to the desirability of preserving or enhancing the character or appearance of the CA. It is also located within Exmoor

National Park (the NP) where there is a statutory duty on decision makers to seek to further the purposes of designation. The primary purpose in respect of the NP is to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park.

7. My assessment of the significance of the Lynton Conservation Area (the CA), accords with the Lynton Conservation Area Appraisal Document (2019) (the CA Appraisal) which states that it is rooted in its transition from medieval village to a 19th Century holiday resort with the 19th Century development the most noticeable today. Many buildings of this period and earlier have retained their original features and original shopfronts. The significance of the CA is, in part, drawn from the quality of its architecture and prevalent use of traditional materials.

8. The building in which the appeal site sits is a white rendered two-storey building, with a pitched slate roof and a flat roofed projection to the rear, the flat roof being at eaves level of the adjacent pitched roof. The property is noted as being a neutral building in the CA Appraisal but is located adjacent to buildings that positively contribute to the CA. While, as noted by the Heritage officer, the flat roof on which the appeal proposal sits is barely visible from public views, the area above the roof, on which development has taken place, is clearly visible from parts of the Lower Cross Street public car park. It would also be visible from windows that overlook the site.

9. In the vicinity of the site, roofs are predominantly pitched slate. The constructed roof terrace with timber balustrading and screening is visible and prominent in views from the Lower Cross Street public car park. Roof level amenity spaces are not characteristic of the area, it looks incongruous on the building and in the roofscape, disrupting views of traditional sloped slate roofs.

10. Consequently, the development is harmful to the character and appearance of the host building and area and fails to preserve or enhance the character or appearance of the CA. In light of this finding, and by virtue of its location in the NP, the appeal development is also harmful to the natural beauty and cultural heritage of the protected landscape. It is therefore contrary to policies CE-S5 and CE-S6 of the Exmoor National Park Local Plan (2017) (the Local Plan) which together require development to conserve and enhance its setting and the local identity and distinctiveness of Exmoor's built and historic environment. These policies are not materially inconsistent with policy DP3 of the Framework. Policy CE-S1 relates to the landscape setting of settlements and was not determinative to my decision.

11. The harm to the significance of the CA is to a low to moderate level. The result is that the duties under the Act to preserve or enhance the character or appearance of the CA, which I have given considerable importance and weight to, would not be met. In such circumstances the Framework advises that the harm should be weighed against any public benefits resulting from the proposal. The works, which would have resulted in some local spending, have already been completed and no other public benefits have been identified. Public benefits do not therefore outweigh the harm to the host building and to the character and appearance of the CA.

Living Conditions

12. The appeal site is on the flat roof of a rear projection to White Rose Cottage. The projection accommodates the kitchen and forms a boundary of a small, enclosed

courtyard garden to Stourton House (No 2 Queens Street). The kitchen windows look out on to the garden. On the flat roof of an adjacent property, which also forms a boundary to the garden, there is a roof garden/amenity space, which overlooks the garden. There is also a fire exit from a neighbouring retail unit (currently occupied by a North Devon Hospice charity shop) into the garden.

13. The appeal site is located close to neighbouring properties, and notwithstanding the balustrading and screening to the appeal development, the elevated position provides direct views into the garden, nearby windows including at first floor level, and the neighbours roof garden. Although some of these areas already experience a level of overlooking from the kitchen window at the appeal property and from the neighbour's roof garden/outdoor amenity area, this does not justify the further significant loss of privacy resulting from the development, which would be harmful to the living conditions of occupants of the neighbouring properties. No substantive evidence has been submitted to establish how often the fire door for the hospice charity shop is used but again its use does not justify a further loss of privacy.

14. Notwithstanding that the development is unlikely to result in a harmful increase in noise for occupants of 5A Queen Street, the appeal site is set within a small, largely enclosed area due to adjacent buildings, and activity at the appeal development would likely create an increase in noise that would be harmful to occupants of neighbouring properties when using their outdoor spaces within this enclosed space or when using rooms with windows on to the enclosed space. The development balustrading and screening would not adequately mitigate the harmful noise.

15. The appeal development therefore adversely affects the living conditions of occupants of neighbouring properties, with regard to privacy and noise. Consequently, it conflicts with policies GP1 and CE-S6 of the Local Plan which require development proposals to pay particular attention to the impact on the amenities of local residents and occupiers and that the use and activity of the development should not detrimentally affect the amenities of surrounding properties and occupiers including overlooking and other adverse environmental impacts. These policies are not materially inconsistent with policies L2-1(d) and P3-2(b) of the Framework.

Other Matters

16. White Rose Cottage is a one-bedroom flat which does not benefit from any other outdoor space. The appeal proposal therefore provides valuable outdoor amenity space which would improve the living conditions of the appellants and future occupants, and I afford this benefit significant weight. However, the benefit is not sufficient to outweigh the substantial harm identified.

17. The appellants consider that use of the roof garden for outdoor living would be limited by the weather. In this respect the proposal is similar to other outdoor garden spaces and this matter does not lead me to an alternative conclusion on the main issues.

18. It is noted by the appellants that the occupants of the neighbouring property, that has the adjacent roof garden, have not objected to the appeal development, but I need to consider the appeal on its planning merits and consider the living conditions of future occupants. Again, this matter has not led me to an alternative conclusion on the main issues.

19. The appellants have drawn my attention to the planning fees they have incurred and the fact that the decision was not made by committee, but these are not matters for my consideration in determining this appeal.

Planning Balance

20. The significant benefits of the appeal proposal to the living conditions of occupants of the appeal property do not outweigh the substantial harm identified. Consequently, the appeal proposal is in conflict with the development plan when read as a whole.

21. Policy S3 of the Framework applies a presumption in favour of sustainable development and for development within settlements Policy S4 of the Framework should be applied. Policy S4-1 of the Framework states that development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects when assessed against the national decision-making policies in the Framework.

22. Policy L2-1(d) of the Framework encourages creation of additional floorspace within settlements, including by use of airspace above existing residential development but that such proposals should be consistent with the overall street scene, not cause substantial harm to the character of a building and its surroundings and maintain acceptable living standards for neighbours with regard to privacy. I afford the harm to the character of the building and its surroundings and to the living conditions of occupants of neighbouring properties substantial weight.

23. Policy P3-2(b) of the Framework states that development proposals should not give rise to, or contribute to, an unacceptable level of noise for neighbouring residents and occupiers and I afford this harm substantial weight.

24. Policy N4-1 of the Framework states that substantial weight should be placed on the importance of conserving and enhancing wildlife and cultural heritage in National Parks. The development is in conflict with this policy, and I afford the harm substantial weight.

25. Policy HE6 of the Framework states that substantial weight should be given to the conservation of a designated heritage asset and where development would result in harm to the significance of a designated asset, the harm should be weighed against any public benefits of the proposal. No public benefits have been identified, and I therefore afford the harm to the significance of the CA substantial weight.

26. Policy DP3-1 of the Framework states that development proposals should respond to their context (the history, character and features of their site and its setting), so that they integrate with and enhance their surroundings. The appeal proposal is in conflict with this policy and there is no clear justification to support this and therefore, in accordance with Policy DP3-3 of the Framework, the proposal should be refused.

Conclusion

27. The proposal is in conflict with the development plan when read as a whole. With regard to the Framework, I conclude that the adverse effects of the development substantially outweigh the benefits when assessed against the national decision-

making policies. There are therefore no material considerations, including the presumption in favour of sustainable development set out in Policies S3 and S4 of the Framework, which indicate that a decision should be made otherwise than in accordance with the development plan. Consequently, the appeal should be dismissed.

S McIntyre

INSPECTOR

EXMOOR NATIONAL PARK

Committee Report

Application Number:	EXM/26/041/FULL
Valid Date:	6 February 2026
Target Determination Date:	4 December 2026
Extension of Time:	4 December 2026
Applicant:	Mrs Louise Bengtson
Agent:	Mrs Louise Crossman
Case Officer:	Yvonne Dale
Site Address:	The Laundry 8 Chapel Street Dulverton TA22 9HF
Proposal:	Proposed conversion of the Grade II listed Former Dulverton laundry building into residential accommodation consisting of 6no. 2-bed apartments in the main mill building; 2no. 1-bed Cottages in the former boiler house and 1no. 2-bed Cottage in the former workshop.
Recommendation:	Refused
Reason for bringing before Planning Committee:	The Officer's recommendation is contrary to that of Dulverton Town Council who support the application. In line with the Authority's Scheme of Delegation the application is brought before the Planning Committee for determination.
Pre-commencement conditions agreed:	N/A

Relevant History

Site Description & Proposal

The application site is the former Dulverton Laundry, a three-storey building constructed of natural stone, wooden panels between timber windows and a hipped slate roof of low pitch. The site lies within the Dulverton Conservation Area, and the former laundry is a Grade II listed building (1247917). It is also recorded on Exmoor's Historic Environment Record (MSO10842), which states that:

'Dulverton Laundry was a crepe factory. It dates to the late 18th/early 19th century and was partly refenestrated in the mid to late 20th Century'.

The site can be accessed from the north east via Chapel Street and from the south west via an access track off Bridge Street known as Duckpaddle.

Planning permission and Listed Building Consent (EXM/26/042LBC) is sought for the conversion of the former laundry building to provide nine residential units, comprising six 2-bed apartments within the main mill building, two 1-bed cottages within the former boiler house, and one 2-bed cottage within the former workshop.

The site is located within Flood Zone 3, and the impact risk zone for the Barle Valley Site of Special Scientific Interest. The site also lies approximately 0.4km south of the Exmoor & Quantock Oakwoods Special Area of Conservation (SAC).

The site occupies a constrained position close to Dulverton town centre, with residential and commercial properties in close proximity to the site and its access routes. The River Barle and mill leat lie immediately to the west/through the site and are relevant to its historic setting and flood-risk context. The relationship of the building to Chapel Street, Bridge Street and views into the Conservation Area from the west are also important to the assessment of the proposal.

Consultee Representations

INITIAL CONSULTATION FEBRUARY 2026

Historic England – 05/3/26:

Historic England Advice

The Significance of The Laundry

Dulverton Laundry is a good example of an early industrial building within the Dulverton Conservation Area which has evolved through several different uses. It has been listed at Grade II due to its special architectural and historical interest.

It originated as a likely early 19th century silk and crepe mill. By the later 19th century, the crepe mill had ceased trading and the building briefly became a joinery workshop, before then functioning as a laundry for over 100 years until its closure in 2018.

The main range is imposing, of three storeys in local rubble stone. It is heavily fenestrated reflecting a necessity for natural light in the silk and crepe-making processes. This interrelationship between the construction and the function of the building contribute greatly to its architectural interest and significance.

Smaller ancillary structures surround the main block, including a parallel range to the north which appears contemporary to the main block, the perpendicular boiler house and a later 20th century boiler house. While no original machinery remains in the building, the removal of the waterwheel and the building of boiler houses is reflective of the evolution in technology in industrial processes.

The building is within the Dulverton Conservation Area. The Conservation Area is well-preserved, with a good stock of late 18th and early 19th century buildings which make use of vernacular building materials, particularly local stone. As there are only a few instances of buildings higher than two storeys, the Laundry is a notably large building within the Conservation Area. It makes a positive contribution to its character, particularly in views down Chapel Street and into the Conservation Area from the west as one enters the town.

Impact of Proposals

We welcome the intention to find a new use for a substantial Grade II listed building within the Dulverton Conservation Area. Residential use can be an effective and appropriate re-use of redundant industrial buildings, and we believe that this site has the capacity to be converted to residential use. However, we have concerns regarding some elements of these proposals.

The scale, massing, and materiality of the newly built elements of the scheme are inappropriate in the context of the Dulverton Conservation Area. The massing of the altered south west boiler building competes with the main building in a way that the existing subservient building does not, with the altered orientation of the roof changing their relationship. The height of the vertically extended north range will block much of the view of the north elevation of the mill as one approaches via Chapel Street, a view which currently makes a positive contribution to the Conservation Area.

Of greater concern is the materiality of the altered boiler buildings. While the intent for the metal cladding to create an industrial character is recognised, this will result in a building which is massively out of place in a well-preserved Conservation Area. In this part of the conservation area, natural stone (often rendered) is predominant.

We recognise that the building being replaced is of later blockwork, so there is a higher capacity for change with regards to impact on the listed building. However, the metal cladding proposed is visually incongruous with the character of the Conservation Area. This is particularly harmful when views in towards the Conservation Area across the river from the west are considered. The massing of the building furthers the impact of the cladding. The harm this would cause to the Conservation Area, and to the listed building, is recognised in the Heritage Statement. This, however, has not been justified.

The scheme also proposes the demolition of the 20th century boiler house and multiple structures which surround the boiler houses and mill. The original functions and heritage value of these structures has not been clearly articulated. While these buildings are likely of lower significance than the main mill range, an understanding of their age and use should be demonstrated. This will enable your Authority to assess any harm caused by their removal, and whether any further justification is required.

We also observe that all windows are proposed for removal. Several of the windows (those multi-pane windows to the second floor) appear to have some heritage value. Their total replacement with the proposed modern windows causes harm not only to the listed building, but also to the positive contribution the building makes to the character of the Conservation Area. Options for retention have not been adequately explored, and therefore this harm has not been clearly and convincingly justified.

Policy

Great weight should be given to the conservation of heritage assets in decision making, and the more important the asset is – the greater this weight should be (National Planning Policy Framework (NPPF), Paragraph 212). The Laundry is Grade II listed and Dulverton Conservation Area is a designated heritage asset, therefore all efforts should be taken to conserve their significance.

Any harm to the significance of a designated heritage asset requires clear and convincing justification (NPPF, Paragraph 213). Several elements of the proposal have the potential to cause harm, which has not been justified. The re-use of a redundant building is not blanket justification for all harm caused, especially where less harmful design options have not been demonstrably explored.

Proposals leading to less than substantial harm to the significance of a designated heritage asset should be weighed against the public benefits of the proposal (NPPF, Paragraph 215). It is for your authority to weigh the public benefits of this proposal against the less than substantial harm that it will cause to The Laundry and to the Dulverton Conservation Area.

Historic England's Position

Historic England support the re-use of a redundant listed building within the Conservation Area, and we believe that the site has the capacity to deliver a residential scheme.

However, we also believe that the current designs will amount to less than substantial harm to the special character of Dulverton Conservation Area, and to the Grade II listed Laundry.

Primarily, we have concerns regarding the following;

- The extensive use of metal cladding to the exterior of the south west range is a jarring material choice within the context of the Conservation Area, especially as this site can be seen when entering Dulverton from the west
- The scale and massing of the north range and the south west range detract from views of the listed building which contribute positively to the Conservation Area.

While we are not opposed in principle to the loss of structures of lower significance, the age, use, and heritage value of the structures to be lost has not been adequately explained.

The removal of early windows has not been adequately justified, and will have a harmful impact on the building's contribution to the character of the Conservation Area.

Before the harm caused by these proposals is balanced against any public benefit of the scheme, this should be mitigated through the exploration of less visually harmful

designs. Additional information should also be provided regarding the significance of the structures to be demolished. The harm can otherwise not be considered justified.

Recommendation

Historic England has concerns regarding the applications on heritage grounds. We recommend your Authority requests amended designs which are less harmful to the character of the Conservation Area. It is then for your Authority to balance the harm of the proposals against any public benefit the scheme offers.

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the applications to meet the requirements of paragraphs 212 and 213 of the NPPF.

In determining these applications you should bear in mind the statutory duty of sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they posses, and of section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.
Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Environment Agency – 03/03/2026

Environment Agency Position

We object to this application due to an inadequate Flood Risk Assessment. Our flood risk concerns relate to the safety of users of the development over its lifetime, in particular the proposals to use the ground floor for residential usage.

Reasons

The building and access road/proposed car park area are located within flood zone 3 ‘high probability’ associated with the River Barle and Hollam Brook, the risk of flooding posing a marked hazard to users of the development.

The modes of flooding at the site are complex and have not been adequately demonstrated within the applicants flood risk assessment (FRA) by WCI Group Ltd Issue 4 dated 17.10.25. We do not agree with the flood risk assessment in terms of the assertion that the ground floor would be ‘suitable’ for ‘residential accommodation’ given the potential depths that could occur and onset/modes of flooding, and given general uncertainty as to ‘design’ an ‘extreme’ with climate change water levels that could occur.

In terms of the potential for damage to occur to both the fabric and contents of the proposal it should be noted that flood resistance measures require installation

following a warning and may not always be fitted in time or preclude flood waters. Whilst the NPPF does not expressly require residential usage to be free from internal flooding, the requirement to ensure users would be safe is quite explicit. Depths of over 0.5 m are deemed unsafe. Flood resistance measures are generally deemed as being unsuitable when water levels of more than 600mm are predicted to occur.

Overcoming our objection

It is evident that alternative 'less vulnerable' usages would be more appropriate for the ground floors of the building in question.

The applicant may wish to commission the production of a detailed hydraulic model and for the flood risk assessment and submissions be revised accordingly. This should include any reasonably foreseeable residual risks associated with the flood risk management infrastructure present.

In the absence of a detailed hydraulic model the FRA should be revised to;

- demonstrate the mode of flooding associated with overtopping of the flood alleviation scheme, from the leat inlcuding failure of its associated flow control sluice, and blockage of the Hollam Brook flood alleviation scheme flow diversion structure
- demonstrate how the levels of flood waters, as shown on photos within the flood risk assessment of the Dec 2012, and 1952, relate to site levels and floor levels.
- show the area of the site and its environs likely affected in the Dec 2012, and 1952,
- show the suggested design flood level of '135.362mA.O.D' on the proposal elevation and section drawings
- the time of onset of flooding from all sources and hazard users would be subjected to in times of flood.

The above is not exhaustive.

Your authorities emergency planner should be consulted with regard to the safety implications to users and their position and reasoning made transparent given safety is a material consideration. It is for the councils emergency planner to determine whether refuge and evacuation proposals are safe and acceptable.

Informatives

We take this opportunity to highlight the below,

- the Environment Agency do not own any assets at the site
- riparian rights and responsibilities will apply with regard to the leat. Such is important to recognise given the leat poses a pathway for flood waters.

- the Environment Agency hold discretionary powers to operate the sluice structures at the inlet to the leat and powers to rebuild/replace them but not a legal obligation to do so.
- we advise the developer establishes ownership and maintenance responsibilities associated with the leat and how such would be transferred, including any structures they will retain ownership of.

Note to applicant
Should you wish us to review any technical documents or want further advice to overcome our objection prior to formally submitting information to the LPA, we may do this as part of our charged for planning advice service.

Further engagement will provide you with the opportunity to discuss and gain our views on potential options to overcome our objection with us, before formally submitting further information as part of your planning application.

As part of our charged for service we will provide a dedicated project manager to act as a single point of contact to help resolve any problems. We currently charge £100 per hour, plus VAT. We will provide you with an estimated cost for any further discussions or review of documents. The standard terms of our charged for service are available.

ENPA Senior Ecologist – 06/03/2026

The application is for the residential development and conversion of a former mill and associated buildings. The biodiversity trigger list has been completed and appropriate reports covering the EcIA and consideration of BNG have been submitted comprising: - Ecological Impact Assessment (Bats and Birds), The Mill, Dulverton (25 September 2025), GE Consulting. Report reference 2971-EcIA-LW - Biodiversity Net Gain Statement and Assessment, The Mill, Dulverton (30 September 2025; GE Consulting, report reference 2971-BNG-RR - Statutory Metric for BNG completed 27 August 2025 (GE Consulting) The methods, presentation of results and recommendations within the reports are satisfactory. It is also noted that surveys were undertaken in 2023 (Richard Green Ecology) and the report has been provided. EcIA Habitats and designated sites.

The site lies within the Impact Risk Zone of Barle Valley SSSI. The site comprises the disused stone mill building with connected boiler house and workshop. A culverted leat runs underneath the mill building and drains into the River Barle around 30m from the site. Pollution prevention measures to avoid harm to adjacent/retained habitats, particularly the Mill Stream are required and should be detailed in a Construction Ecological Mitigation Plan.

Sensitive lighting during construction and operation of the site is also important to avoid harm to species associated with the SSSI habitats. Despite lying only 400m from the site, it does not fall within the bat consultation zone for the Exmoor & Quantock Oakwoods SAC. Impacts on the populations of Barbastelle and Bechstein's bat which are qualifying features are therefore unlikely.

It is also noted that neither species was recorded during these surveys and the site offers sub-optimal foraging habitat for bats as it is mainly hard-standing, surrounded by buildings with lighting. Bats Surveys have confirmed the presence of low numbers of roosting lesser horseshoe, serotine, common pipistrelle and soprano pipistrelle day roosts and a lesser horseshoe hibernation roost. A licence will need to be obtained from Natural England prior to the start of works which would otherwise cause an offence due to the destruction and/or modification of these roosts as a result of proposals. Mitigation will include sensitive timing of works (to avoid the hibernation roost), supervision of works and mitigation and compensatory roosts: a dedicated bat loft retaining (modified) the lesser horseshoe and soprano pipistrelle day roosts with appropriate access; a squeeze box in the bat loft for serotines; three ridge gaps and four bat access slates for common pipistrelles. Two additional slates/boxes will be provided as enhancement. Lighting will be minimised.

Birds Swift, wren and jackdaw were recorded nesting within the roof of the building, which offers numerous other opportunities.
The vegetation around the site (mainly scrub) also provides suitable nesting opportunities. Vegetation clearance will be timed to avoid the nesting bird season, or will require a nesting bird check by an experienced ecologist. Three general purpose bird boxes will be provided to compensate for the loss of nesting opportunities as well as two swift boxes for enhancement. Otter are known to use the River Barle and it is likely that they use the mill stream. However, no evidence of their presence was recorded on site.

Good practice must be followed during work to prevent harm, such as providing ramps to allow animals to exit excavations (or covering them if deep) and capping pipes, which will protect otters (and other mammals which may occasionally use the site such as hedgehogs) during works.

Pollinators

Removal of the bee nest should be undertaken by a registered professional when the bees are inactive. New planting should seek to provide opportunities for pollinators. Plants Montbretia, a Schedule 9 species, has been recorded adjacent to the site (off-site) and must be appropriately managed to avoid spread of this species, which would cause an offence.

BNG 1. Has the applicant provided a statement as to whether they believe planning permission would be subject to the biodiversity gain condition? Yes - BNG applies (major development) 2. Has the pre-development biodiversity value of the site been established? Yes Habitats - 0.06 units Hedgerows - 0.00 units Watercourses - 0.03 units 3. What metric has been used? V4 4. Who did the assessment (competent person test)? GE Ecology Rowan Roblyn BSc Louise Woolley BSc MCIEEM Experienced and trained ecologists, LW is accredited to use MoRPh5 5. Has the post-development biodiversity value of the site been established? Yes Habitats - 0.01 units (-85%) Hedgerows - 0.00 Watercourses - 0.03 units (0%) 6. When was the baseline established? 4 June 2025 Note, this is >3 months prior to submission of the application - needs checking it's still correct prior to submission of BGP. 7. Has degradation occurred? No 8. Are irreplaceable habitats present? No 9. Are priority habitats present? Yes 10. Are EPS present? Yes 11. Is 10% achievable on-site? No

12. If no, how do they propose to deliver 10% BNG? Off-site units (0.06 units) will be sought to provide sufficient BNG and meet trading rules.

The report discusses significance and refers to the LNRS and Somerset Council guidance, and concludes that the development is not providing 'significant BNG'. However, referring to the Technical Guidance Note for BNG on Exmoor, the site's position within close proximity to designated sites, does deem the development 'significant'. This should be reconsidered prior to submission of a BGP pre-commencement.

Whilst 10% BNG is not achievable on site, the project team have sought to follow the BNG hierarchy and seek gains on site, where possible, acknowledging the limitations of the site. The proposal therefore includes the purchase of BNG units from a habitat bank - details on what will be purchased is required alongside the BGP at pre-commencement stage and what is registered and allocated must be confirmed.

Conditions Please apply conditions to any permission granted ensuring: - An HMMP is submitted (and agreed) prior to the start of works (alongside a BGP to discharge the general biodiversity net gain condition) - A bat license is secured prior to the start of works - The recommendations within the report are adhered to, including mitigation and enhancement - Sensitive timing of works to avoid the bird nesting season, or a pre-works check is carried out by an ecologist - A Construction Ecological Mitigation Plan is submitted (and agreed) prior to the start of works, to include sensitive lighting during construction - A lighting strategy for bats is submitted (and agreed) prior to the installation of external lighting.

ENPA Senior Heritage Officer – 04/03/26

The building is perhaps the largest and best-known derelict listed building within the National Park. It has been empty since 2018 since the closure of the Laundry and its condition continues to be of great concern. It has been on the National Parks list of 'at risk' Listed Buildings since its closure. Its use as an industrial building is almost certainly in the past and it seems unlikely that any commercial use will not be forthcoming. A great deal of time and expense is required to bring it back into use. While I am currently opposed to the application, I am hopeful that my reasons for objecting can be overcome and that the building can be given a new use and be secured for many years to come.

This is a complex application with a number of areas to consider. During the pre-application process I advised that a level 3 building recording was carried out to inform the application. An existing report by Martin Watts was commissioned by the National Park Authority to provide a starting point for this understanding. I am grateful that a further survey has been carried out by Heritage Vision which contains a considerable amount of useful information. I will not comment on the proposed use regarding our policies on local needs affordable housing beyond stating that residential use seems to be the only viable option at the present time.

I am content that the building is capable of being converted to this use without causing substantial or unjustified harm to its significance when carried out in accordance with local and national heritage planning policies.

The building is an early 19th century industrial building built sometime between 1820 and 1838, it was likely originally designed to function as a crepe (textiles/silk) mill. This makes it an early example of a building of this type.

The design of the building is very functional with the large stone 'piers' supporting wide span open floors for the power looms. The large expanse of glazing would have provided ample natural light to the machining floors. The following description is provided in the level 3 assessment: "The building is an important example of the latest principles of factory design in the 1820's: The Dulverton factory is of only three stories and five bays but appears to have been purpose built for crepe production. It reflected some of the latest principles factory design of the 1820s, combining local stone with walls of distinctive pier and panel construction. The building was clearly intended to provide the maximum level of natural lighting. The narrow stone piers supporting the floor beams enable the use of wide casement windows in the intervening wooden panels. This gave an unusually high proportion of glazing in the side elevations.

Textile Mills of South West England, M Williams, English Heritage, 2013." The interior of the building would likely originally have been largely open-plan and full of machinery. As the use of the building has developed all the historic machinery and workings have been removed. Some partitions have been added in the 20th century and all floors are now sub-divided to some degree.

This is an extract from the level 3 report: "An inventory that was prepared for the factory in 1859 that helpfully describes the working of the building: the weaving of the silk took place on the ground floor on 11 power looms whilst the upper two floors transformed the fabric into crepe by wetting and drying it."

The textile industry in Dulverton appears to have ceased in around 1866 and the building was then used as a joinery workshop before the Dulverton Laundry Company was established in 1903. This ran until its closure in 2018. I have added the list entry for the building below for reference: "Crepe factory, now laundry, Late C18-early C19, partly refenestrated mid-late C20. Random rubble local stone, wooden panels between windows, shallow pitched hipped slate roof. Plan: rectangular block originally identical north south sides. Stairs east end. Three storeys, 5-bays, full height rubble piers, rubble plinth and cornice divided by many paned leaded wooden casements second floor, 6-light end bay, two 4-light, one 3-light and 5-light wooden panels below, first floor mostly replaced with C20 plate glass, ground floor north face masked by additions, south face some casements still remaining, end bay right panelled over with square headed entrance, recessed 8-panel door with inserted light, lit upper 2 storeys on returns. Commended by Pevsner as a good example of an early industrial building."

The building is highly significant to the history and development of Dulverton. Paragraph 210 of the National Planning Policy Framework (NPPF) states that. In determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable

communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness.

This paragraph shows the need to balance the harm that giving a building a new use may cause to it, against the benefit that this can bring in securing its conservation. However, this does not give an open door to cause harms which are without justification.

The conservation of heritage assets still carry great weight in the NPPF (para 212). Paragraph 215, is also a key consideration: Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. Exmoor Local Plan Policy CE-D3 Conserving Heritage Assets (5) states the following: "Redundant Heritage Assets and Assets at Risk a) development proposals that seek to bring heritage assets, that are redundant or at risk, into a viable use in ways that are consistent with their long term conservation will be encouraged; and b) proposals should be consistent with policy CE-S4 Cultural Heritage and Historic Environment and CE-S5 Principles for the Conversion or Structural Alteration of Existing Buildings to ensure they continue to positively enhance local character and distinctiveness."

The structural report confirms the building is capable of conversion without substantial alteration or reconstruction in accordance with CE-S5. I will comment on the various elements of the application in turn.

Demolitions: There is a significant amount of demolition proposed in the application. While the listing only refers to the main mill building, I would consider all the associated structures which are proposed for removal as being curtilage listed because of their age, because they have an ancillary use to the mill, and because they were seemingly where all in the same ownership at the time of listing. Many of the structures are physically attached to the main mill structure. The main structures of interest are the main mill building, the workshop to the north and the boiler room to the south west. All these structures are being retained, albeit with significant amount of stripping out. The other structures are of little historic merit and in some cases detract from the listed building. I am largely unconcerned about the elements shown as being removed.

Subdivisions of the mill: As already mentioned the mill likely had open working floors. The change of use to residential will necessitate the subdivision of these spaces and is in my view a justifiable alteration and the harm caused by this is outweighed by the public benefit the scheme provides.

Changes to the fenestration: This is the most changing aspect of the application. The external fenestration of the building is the most significant feature of the building and, clearly, subject to the most visible change. The multipaned windows are one of the buildings most significant features. It is clear from the list description that many of the windows had been altered in the late 20th century. Photographs provided from the c1950 show these windows survived at this time. However, there are still a large number of the small pane casements in place which may well date from the early 19th century. It is not known if they are original but they have clearly been in place

for a significant amount of time. The mix of window types and styles that have been added over time has had a negative impact on the building. I am concerned about the proposed windows. The suggested windows are 48mm triple glazed units which have no glazing bars and composite frames. The result is very different to the historic fenestration. I would disagree with the following statement contained in the design and access statement: "Replacement of the existing timber joinery and small paned windows present conflicts with current health and safety maintenance practice especially given the access challenges presented by the proximity of the leat". No evidence is provided in support of this statement.

The heritage significance of these windows would very likely outweigh any such concerns. That said, I accept that they are in a very poor condition and likely beyond repair. The proposed windows would not accord with the current Historic England guidance on windows. Where a historic window is to be replaced the preference is for this to be like-for-like replacement. When this is not possible it should match as closely as possible with secondary glazing used when required. Slim profile double glazing is accepted in some circumstances where the window is not historic. Full replacement of a historic multi pained window in a listed building with a composite 48mm triple glazed unit of a very different design would be without precedent from my research.

One option I would be open to considering in this instance is the use of vacuum glass which gives very good u-values that are equivalent to triple glazing and are only 7mm thick as opposed to the 48mm triple glazed units which are proposed. There is a limit to the glazing pane size and I expect the small panes that I would like to see replicated are too small and so applied glazing bars would be required. Having seen samples of these glazing bars applied to vacuum glass I would be confident that these windows would work in this situation. I would also be potentially open to the use of a pure metal window. Early industrial buildings often had metal windows, sometimes of cast iron. Companies such as Crittall provide glazing which I feel would be more appropriate to this building.

However, a timber windows is still preferable as there is no evidence this building ever had metal windows. It may also be possible to install double glazed timber casements to the design shown with single glazed casements to the multipaned design sat forward of these. The double glazed windows in effect working as a secondary double glazed unit. I am happy to discuss this further with the agent/applicant. I would not require the multipaned windows to the other areas such as the boiler house and the workshop but am of the view that the composite triple glazing is not appropriate for the listed building and does not accord with our policies on materials. I would also be opposed to the use of aluminium in the spandrels between the windows. It is not possible to know what these panels were originally but it seems likely that they were timber. This is strongly preferable and better accords with policies CE-S5 and CE-S6. I am not sure if there is evidence of an early finish behind the existing panels? It would be useful to know this.

Zinc interlocking panels are proposed on the extension to the boiler house. The Local Plan states that the materials and design elements of a new building or conversion of an existing building, should complement the local context through the use of traditional and natural sustainable building materials. The use of locally-

sourced sustainable building materials will be encouraged. I would suggest timber cladding is used. I am not opposed to a contemporary appearance to this element of the structure. Modified timber products are available which have long life guarantees. A corrugated metal cladding or a cor-ten steel maybe more appropriate if metal is desired.

Changes to the north range/workshop: I support this element of the scheme. It is clear this used to be a 2 storey structure with a dual pitched roof. The reinstatement of this is a benefit. I am also pleased to see the wheel pit will be retained and made visible.

Solar panels: Historic England guidance supports the use of solar panels on listed buildings provided they are not visually intrusive. The Laundry is the only 3 storey building in Dulverton and I am concerned about the prominence of the panels. There are a number of locations around Dulverton where you are in an elevated location and can look down onto the roofscape. However, there are only a few locations where the southern roof slope is visible. In Dulverton itself it would not be possible to see the panels. I therefore do not object to this element of the scheme. A vent is shown to the roof which presumably is associated with plant equipment. I would like additional detail on this. Is it glazed and openable?

Other points: There is a blocked fireplace in the east gable of the second floor. I would like to see this retained. I could not see it on the proposed floor plan. I would request a number of conditions around materials and samples should the application be approved. I would also request a WSI to monitor the stripping out works.

Somerset Council – Rural Housing Enabler – 19/02/2026

The applicant seeks permission to create nine separate dwellings through the conversion of both the main building, the former boiler house and the former workshop. Listed building consent is required due to the Grade II status and consequently the detail in the application is largely focussed on these matters, but this formal response does not attempt to address these and instead is focussed on the intended outcome in terms of tenure type.

The Exmoor Local Plan policy HC-D2 allows for conversions to dwellings where “there is a proven local need for the dwelling(s) which will meet an affordable local need, and the intended occupants meet the requirements of the local need occupancy criteria in perpetuity in accordance with HC-S3;

“and … the dwelling(s) will be affordable by size and type to local people and will remain so in perpetuity in accordance with HC-S2”
It further stipulates that market (principal residence) dwellings can be permitted in limited circumstances, where

“it is clearly and robustly demonstrated that an element of Principal Residence market housing (HC-S4) is required to enable delivery of local need affordable housing (HC-S3) which cannot be made financially viable without it”
and

“it is the minimum number of Principal Residence market dwellings required to support the delivery of the required affordable housing and will maximise the proportion of affordable homes within viability constraints”

In other words, the primary purpose of allowing such a conversion is to produce the locally required affordable housing with any market housing (restricted to principal residence) permitted only to the minimum number needed to produce any cross subsidy required to make the affordable element financially viable.

However, the applicant has presented the case for solely creating market dwellings and has cited viability issues preventing the inclusion of any affordable dwellings. The viability case is made in Appendix 4 of the Design and Access Statement which is not available in public domain due to commercial confidentiality. Clearly the planning authority will wish to verify that the data provided on viability is both accurate and robust before considering the implications.
However, my observation is that the applicant cannot argue that only a purely market housing scheme is viable because policy HC-D2 is framed around allowing market housing only in order to ensure the provision of (some) affordable housing. In my opinion if no affordable housing is being offered, there is no justification for any market housing being permitted under HC-D2, regardless of the economics.
If the applicant is able to overcome the viability issues, for example by working in partnership with a Registered Provider, such as a Housing Association, who may then be able to access subsidy in the form of a capital grant from Homes England in order to provide an element of affordable housing, then the following comments would apply.

As at 6th January 2026 there were 78 households registered on Homefinder Somerset citing a local connection to the parish of Dulverton, of whom 45 required a 1-bedroom dwelling and 20 required 2 bedrooms. This supports the provision of the proposed nine dwellings in terms of affordable housing for rent alone.

In the event that permission is granted, there should be a s106 Agreement enforcing perpetuity of any affordable housing and setting out the criteria for proposed occupants, both in terms of their inability to access suitable market solutions and their valid local connection to the Parish of Dulverton or adjacent parishes in accordance with current Local Plan policy HC-S3.

There are no other material observations.

Dulverton Town Council – 26/02/2026

The Council supports the proposal in principle with the following reservations:

Car Parking
There is only one car parking space allocated to each residence proposed on the basis that a reduced number of spaces can be justified as the location is close to the town centre and there is access to a regular bus service. The Council strongly disputes that there is an adequate bus service serving Dulverton.

Affordable Housing
Although the application states that Local Needs Affordable Housing is not viable the Council requests that Principle Residence Housing should be stipulated if the application is passed.

Rubbish Collection
The rubbish collection point is unclear on the application. The Council wishes to object to adding any more bins being placed for collection at the Chapel Street Collection Point due to the narrowness of the road. The existing large wheelie bin is for the use of No 1, 3 5 and 7 Chapel Street only.

Right of Access
Council notes that there are other residents who have a right of access along the entrance road to the development.

Proposed Materials
Council expressed concerns that the proposed replacement windows will be of aluminium. Council expressed concern that all proposed materials to be used should be in keeping with the Listed Building and should retain the historical integrity of the building.

Construction Traffic
Council expressed concern regarding the management of the building works that will need to be undertaken. Council requests that if permission is granted that consideration is given to the health and wellbeing of local residents and that a comprehensive traffic management plan be drawn up and adopted prior to the commencement of construction to ensure that time restrictions are in place regarding the transportation of materials and that potential congestion is avoided to mitigate any disturbances and protect the vitality and viability of nearby local businesses.

RE-CONSULTATION JUNE 2026

Historic England – 16/06/26
Summary
The Laundry is an imposing Grade II building which makes a positive contribution to the character of Dulverton Conservation Area. We previously expressed concern with the proposed massing, materiality and fenestration due to the harm caused to the character of the Conservation Area. While some of this has been mitigated, we do maintain some concerns with the scheme.

Historic England Advice
Proposals
The proposal aims to convert a disused former mill and later laundry building into residential accommodation. These amendments represent a small change to the openings of one range, and the change from proposed zinc cladding to timber cladding on the same range.

Significance of The Laundry

Dulverton Laundry is a good example of an early industrial building within the Dulverton Conservation Area which has evolved through several different uses. It has been listed at Grade II due to its special architectural and historical interest. It originated as a likely early 19th century silk and crepe mill. By the later 19th century, the crepe mill had ceased trading and the building briefly became a joinery workshop, before then functioning as a laundry for over 100 years until its closure in 2018.

The main range is imposing, of three storeys in local rubble stone. It is heavily fenestrated reflecting a necessity for natural light in the silk and crepe-making processes. This interrelationship between the construction and the function of the building contribute greatly to its architectural interest and significance.

Smaller ancillary structures surround the main block, including a parallel range to the north which appears contemporary to the main block, the perpendicular boiler house and a later 20th century boiler house. While no original machinery remains in the building, the removal of the waterwheel and the building of boiler houses is reflective of the evolution in technology in industrial processes.

The building is within the Dulverton Conservation Area. The Conservation Area is well-preserved, with a good stock of late 18th and early 19th century buildings which make use of vernacular building materials, particularly local stone. As there are only a few instances of buildings higher than two storeys, the Laundry is a notably large building within the Conservation Area. It makes a positive contribution to its character, particularly in views down Chapel Street and into the Conservation Area from the west as one enters the town.

Impact of Proposals

In our previous letter of 5th March 2026, we welcomed the principle of residential conversion for the Laundry but had some concerns regarding the materiality and massing of the buildings.

The change from zinc to timber cladding is positive, and while timber cladding itself is not common in the Dulverton Conservation Area, this is a natural material that is far less visually jarring with the modest character of the town. This is clearly delineated as a new phase of development.

The massing of the proposals has not changed, therefore the positive view to the mill as one approaches Chapel Street will still be eroded, harming the character of the Conservation Area.

Furthermore, the replacement of the windows with modern aluminium windows is still proposed. The removal of characterful windows and extensive use of aluminium windows across the elevations of this building will be of detriment to the character of the Conservation Area.

Position

Great weight should be given to the conservation of heritage assets in decision making (National Planning Policy Framework (NPPF), Paragraph 212). The Laundry is Grade II listed and Dulverton Conservation Area is a designated heritage asset, therefore all efforts should be taken to conserve their significance.
With this in mind, our concerns regarding the use of metal cladding have been mitigated. The change to timber will better conserve the character of the Conservation Area.

However, we maintain our concerns regarding the massing of the building and the fenestration scheme. We recognise that there are building regulation implications that have steered the choice of the windows, however there is a clear degree of harm caused by this proposal. Timber windows would of course be preferable, but if aluminium is necessary, we would recommend for the window character to be less overtly domestic than that which is proposed.

Your Authority must weigh the harm that the proposed scheme will cause to The Laundry and to the character of the Dulverton Conservation Area against the public benefit which the scheme offers (NPPF, Paragraph 215).

Recommendation
Historic England recommends that in determining this application your Council should weigh the harm which the proposed development would cause to the significance of the Laundry and Dulverton Conservation Area against such public benefits as the development may procure. In doing so, it should give great weight to the conservation of these designated heritage assets.

If there are any material changes to the proposals beyond those we have suggested, please contact us. If you propose to determine the application in its current form, please inform us of the date of the committee and send us a copy of your report at the earliest opportunity. Please also advise us of the decision in due course.

ENPA Senior Heritage Officer – 08/07/2026
I note in my response the comments made in objection by both Historic England and The Georgian Group. Their concerns are largely in line with my earlier comments dated March 6th which should also be referred to. It is important to state from the start that neither of these bodies, nor myself, are objecting to the proposed change of use of the building, and that our objections relate to design elements in the application. The listed status of the building is not a barrier to the proposed change of use.

While some welcome revisions have been made to the scheme, such as the timber cladding to the boiler house extension (although this is only shown on the south west elevation at present), I am still unable to support the application as it currently stands, The major remaining stumbling block for the application(s) is the window design and the wider treatment of the external fenestration. It is still proposed to use 48mm triple glazed composite windows with no glazing bars. These are very

different in design and appearance to the existing timber multipaned single glazed windows and will give the fenestration of the building a much more domestic appearance. To permit such a change of window design on a listed building in a conservation area would set a national precedent and be contrary to local and national planning policy. Therefore, I cannot support the scheme as it stands. Historic England and The Georgian Group have both come to the same view on this with the Georgian Group being of the view the proposals cause a substantial level of harm.

The justification provided for the use of the triple glazed, aluminium composite windows is primarily cost and to ensure the building complies with modern energy efficiency standards. While the costs provided for the windows is helpful I can only give this limited weight. As the Georgian Group state, a private financial benefit does not constitute a public benefit in the NPPF. The NPPF gives great weight to the heritage assets conservation irrespective of the level of harm. Part L of building regulations which relates to the conservation of fuel and power provides an exemption for the requirement of listed buildings to fully comply with energy efficiency requirements where the works would unacceptably alter the character or appearance of that building. The document requires the building control body to take into account the views of the local authorities conservation officer.

There are numerous highly listed mill buildings throughout the country which have been successfully converted while maintaining their original windows or with new windows being fitted which replicate the small pane glazing which is characteristic of such buildings.

I also object to the use of aluminium panels between the windows and would ask that timber is used instead. The material will look out of place on the listed building and will have a harmful impact on the conservation area.

I note the comments made by the Georgian Society regarding the solar panels. In my previous comment I supported the solar panels as I of the view that the visual impact will be slight. I maintain this view but agree that further detail on the impact on the roof structure and a energy strategy would be helpful.

Somerset Council – Rural Housing Enabler – 16/06/2026

I have received an alert stating amendments to these applications (both Full & Listed Building Consent) for repurposing the former laundry in Dulverton. Looking at the planning portal, it seems that these amends follow further discussion on site and consider details such as window types, use of aluminium flashings and rights of access. I have no comment on these matters.

However, the email from the agent appears to dismiss the points raised in my original formal response with respect to the requirement to provide affordable housing. Nothing in the amendments posted on the portal alters my substantive point, viz "… the applicant cannot argue that only a purely market housing scheme is viable because policy HC-D2 is framed around allowing market housing only in order to ensure the provision of (some) affordable housing. In my opinion if no affordable

housing is being offered, there is no justification for any market housing being permitted under HC-D2, regardless of the economics."

Dulverton Town Council – 23/06/2026
Members of the Planning Committee support this Planning Application

RE-CONSULTATION JULY 2026

Dulverton Town Council – 28/07/2026
Dulverton Town Council supports this application

Environment Agency – 04/08/2026
Environment Agency Position

Whilst the latest submissions are helpful in providing additional context and a clearer understanding of the overall proposal, these relate primarily to non-flood risk planning matters. As such, they do not alter our position previously set out on our consultation responses dated 29 June 2026 and 3rd March 2026 (Objection until an updated FRA / plans are received).

Observation
We note that 'Flood Protection Barriers' are shown on several of the 15/07/2026 'Created Date' submissions on your authorities planning portal.

Historic England – 20/07/2026

We have already provided advice on this application in our letter of 24th June 2026. That advice stands, and we have no additional comment to make in response to this further information. It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals.

Somerset Highways Authority – 21/07/2026
The latest amendments only show the building elevations, they do not take on board the comments of our Officer on the 18th June about the red line plan, please can this be addressed.

The Georgian Group – 30/06/2026
Thank you for consulting The Georgian Group about the above scheme with proposals comprising: Listed building consent for the proposed conversion of the Grade II listed Former Dulverton laundry building into residential accommodation consisting of 6no. 2-bed apartments in the main mill building; 2no. 1-bed Cottages in the former boiler house and 1no. 2-bed Cottage in the former workshop.

Having regrettably not been involved in the extensive pre-application discussions which took place, we are grateful for the Extension of Time so we could give this our proper consideration and, given the nature of the proposals, consult the expert advice of The Georgian Group's Casework Committee.

The Significance of the Dulverton Laundry

Dulverton Laundry, listed at Grade II and located within the Dulverton Conservation Area, is significant as a well-preserved example of a purpose-built silk mill associated with the South West silk industry, built c1820. Its later prolonged use as the town laundry illustrates Dulverton's economic shift during the 20th century from industry towards tourism.

Architecturally, the building still reflects its original function, through its open ground and first-floor spaces, which accommodated the looms and crepe-making processes. The north and south ranges illustrate associated ancillary uses and the transition from water power, evidenced by the surviving wheel pit, to alternative forms of power, generated from the boiler houses. Its relatively modest scale, for a mill, reflects its origins as a purpose-built silk mill, rather than the more common adaptation of a former woollen mill for silk production. It is heavily fenestrated, which is a highly significant architectural feature, reflecting the need for natural light in the silk and crepe making processes.

The Conservation Area is well preserved with a good stock of late 18th and early 19th century buildings in vernacular materials and form. Being of three storeys, the mill is taller than most buildings in the Conservation Area and is therefore a recognisable and distinctive building within the town, visible through views, in particular from Chapel Street to the west. It thus contributes positively to the character of the Conservation Area.

Impact of the Proposals
Change of Use

The application states that, despite marketing efforts, no interest has been received since the mill became vacant in 2018 for a use that would preserve its industrial heritage and layout. The LPA has therefore accepted the principle of a Change of Use to residential, and we do not question that position. Indeed, we welcome the return to meaningful use for this vacant building, noting that it is on your LPA's At Risk register.

Interior

On this basis, we are prepared to accept the proposed internal layouts, although we advise they would erode the building's industrial character and harm its significance through the loss of historic fabric. In particular, the insertion of domestic partitioning would irrevocably alter the open industrial character of the spaces, while the removal of the existing historic stairs would result in the loss of both fabric and the vertical circulation routes that have characterised the building's use for c200 years. Nevertheless, we acknowledge the proposed central stair and associated new central doorway is a reasonable means of access to the apartments.

This loss of significance amounts to a high degree of less than substantial harm resulting from loss of planform, historic circulation routes and historic fabric. However, we do not intend to refute the assertion that it may be considered justified

in order to secure a viable use for the building, as according to the terms of the NPPF.

Exterior

If Change of Use is accepted, and your Authority is minded to accept the nature of the conversion, we would therefore emphasise that it is the exterior of the building which should - and must - retain and sustain the architectural and historic Significance of the former mill / laundry, as its significance would have been Considerably eroded, if not entirely vitiated, within.

Unfortunately, we do not find the proposals preserve this. We focus our concern on the matter of the proposed fenestration, to which we register our strong objection.

The fenestration is of high intrinsic value to the significance of the building. The simplicity of the rubble walls is balanced by the complexity of the multi-pane fenestration. This is very distinctive and is characteristic of such industrial buildings. It is central to the architectural and historic interest of the main elevations, and hence to the overall significance of the building.

To replace the multi-pane fenestration as proposed would be entirely out of character (overtly domestic), would alter the proportions by introducing a bland verticality, would change materiality and would dilute visual interest. It would also comprise loss to the last remaining historic frames and glazing (which has not been properly assessed), which is counter to Historic England’s guidance on the care, repair and upgrading of traditional windows. We likewise do not support the proposed insertion of the aluminium external panels, which would be visually incongruous and introduce an alien material to the vernacular elevations.

We would make clear that these proposals are not only harmful to the intrinsic interest of the listed building itself, but also to the Conservation Area.

It is claimed that the proposed fenestration is necessary for financial viability. The Financial Viability Report has not been made publicly accessible on the planning site, so this cannot be assessed; however, any such claim must be subject to the highest scrutiny. The level of justification would have to be extremely high to legitimise an alteration of such grave and inherent harm to the remaining architectural and historic significance of a listed building. We remind your Authority that financial private benefit does not constitute a public benefit, for the terms of the NPPF.

Cumulative impact

Moreover, and of particular importance, we have serious concerns regarding the cumulative impact of the proposed changes. We advise that permitting such a fundamental alteration to the exterior would, when considered alongside the proposed internal interventions, result in the cumulative erosion of the building's surviving heritage significance to such an extent that they would place at risk the overall special interest of the building. For this reason, we would assign substantial harm to this aspect of the proposals.

Solar panels

The installation of solar panels on the south slope will impact the listed building (existing fabric and character), and also the Conservation Area. The south slope is visible from near and far.

Whilst not opposed to solar panels in principle, we do not find this element of the proposals currently sufficiently justified. They have not been presented as part of a holistic and comprehensive energy strategy for the development. Nor have the proposals been appropriately assessed in terms of methodology and the impact on existing / historic roofing fabric.

Solar generation should be a component of a wider green energy approach and not a ‘quick fix solution’ in place of alternative or complementary clean technologies. This is particularly pertinent when the proposals would carry harm to the listed building and Conservation Area, where alternative approaches might not.
We urge your Authority to seek further detail on the overall energy strategy, and the nature of the solar panel installation, in order to properly consider this element of the proposals.

Summary and recommendations

Whilst we do not object to the principle of change of use for Dulverton Laundry, and we are consequently prepared to accept a high degree of loss of significance to the interior of the mill, we advise that we cannot support the proposals as they stand.

If your Authority is minded to accept Change of Use and conversion to residential then (when considered alongside the impact of internal alterations) the window proposals would erode the building's special architectural and historic interest, resulting in a fundamental and profound change to its character and significance. We consider that the window proposals would result in substantial harm to the significance of the listed building through the removal of one of its principal surviving historic elements that contributes materially to its designation.

We recommend that the fenestration strategy should be revisited: to preserve the surviving historic windows through repair and reuse, and (where this is not possible as the historic windows have been previously lost) that replacement is more faithful to the architectural principles of the historic fenestration, in terms of form and material.

The Group considers this to be critical in order to preserve the special interest of the Grade II listed building.

We recommend that the applicant revises this element of the proposals. If they are unwilling to do this, the application should be refused.

We defer to the expertise of your Local Authority's Conservation Officer over all other matters in relation to this application.

RE-CONSULTATION OCTOBER 2026

Historic England – 19/10/2026
We have already provided advice on this application in our letters of 5th March, 16th June, and 20th July 2026. That advice stands, and we have no additional comment to make in response to this further information.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals.

Somerset Council – Environmental Health – 20/10/2026
The proposal is for a residential development on a former commercial laundry that could have used and stored various fuels and chemicals. The developer should be aware of the potential for contamination on the site and the possible risks to future users and workers during the redevelopment.

Therefore, it is recommended that the developer should investigate and assess the site for any risk. A condition is suggested (below) that requires the developer to take the appropriate steps if any contamination is found during the development.

Contaminated Land (Watching Brief) Condition.
Due to former uses of the site it would be advised to keep a watching brief for potential contamination and assess for visual and olfactory evidence of contamination during any groundworks.

If any unforeseen contamination is found during excavations, the Local Planning Authority shall be notified immediately.

Where remediation is deemed necessary by the Local Planning Authority, a remediation scheme shall be submitted to and approved in writing by the Local Planning Authority and then implemented in accordance with the submitted details.

NPPF s.184: Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.

Reason: To ensure that the land is suitable for the intended uses and to ensure that the development can be carried out safely without unacceptable risks to human health, controlled waters and other receptors both onsite and offsite, in accordance with section 11 and 15 of the National Planning Policy Framework.

Somerset Highways Authority – 20/10/2026
A SUBSTANTIVE response will follow

Somerset Highways Authority – 07/10/2026
No objection subject to conditions and/or S106 obligations detailed below.

I refer to the above planning application at The Laundry, 8 Chapel Street, Dulverton, TA22 9HF.

The application intends to utilise the existing vehicular access from Bridge Street, Dulverton in order to access the site and vehicular parking area. Whilst it is recognised that the access road is narrow in width, there is the existing use for vehicles at this site, accident data shows there have been no incidents recorded in the last 5 years. Due to the nature of Bridge Street, namely the Barle Bridge to the West of the site and the public car park opposite, vehicular speeds are expected to be low in this location. Furthermore, although there are a lower number of vehicular parking spaces proposed on the site, the application is located in a relatively sustainable area in the context of Exmoor, within walking distance of Dulverton's shops, amenities and public transport facilities.

Should the LPA be minded to approve the application, the Highway Authority recommends the following conditions be applied:

1) Before the development is occupied or utilised the cycle parking facilities shown on the submitted plans must have been constructed. Thereafter, these must be maintained, kept free from obstruction and available for the purposes specified.

2) The Development hereby permitted shall not be occupied until the proposed parking spaces for the dwellings and a properly consolidated and surfaced turning space for vehicles have been provided and constructed within the site in accordance with details which shall have been submitted to and approved in writing by the Local Planning Authority. Such parking and turning spaces shall be kept clear of obstruction at all times and shall not be used other than for the parking and turning of vehicles in connection with the development hereby permitted.

Informative:
It has been noted that there is potential encroachment onto the Highway in the proposed plans, therefore the applicant should obtain a Road Record to ensure that the red line of the site does not encroach, or a stopping up process is being pursued.

Dulverton Town Council – 22/10/2026
Members of the Planning Committee support this amended Planning Application

The Georgian Group – 27/10/2026
Thank you for re-notifying The Georgian Group about the above application, with proposals comprising: Proposed conversion of the Grade II listed Former Dulverton laundry building into residential accommodation consisting of 6no. 2-bed apartments in the main mill building; 2no. 1-bed Cottages in the former boiler house and 1no. 2-bed Cottage in the former workshop.

The re-submission has not addressed our heritage concerns, set out in our response dated 30th June (- attached again for your convenience).

Consequently, I refer you to that representation, and have no further comments to make.

ENPA – Historic Environment 03/11/2026
The proposed development comprises the removal of the ancillary buildings associated with Dulverton Laundry and modifications and adaptation of the principal building itself; this would include groundworks.
The two submitted reports provide a significant amount of useful information, but do not comprise a full Level 3 historic building record, as per the relevant guidelines (Historic England 2016).

Therefore, should planning permission be granted, a staged programme of historic building recording, historic building monitoring, and archaeological monitoring is recommended.

Firstly, a Level 4 building record of the elements to be demolished, and a Level 3 record of the standing structure, incorporating the results of the two earlier phases of fieldwork (Watts 2018; Heritage Vision 2025). This should take place prior to the development commencing. The record should also include any details revealed during the development (e.g. blocked openings revealed by stripping out works); this is likely to take place in stages according to the development schedule.

Secondly, the proposed development has the potential to both reveal further information about the functioning of the waterwheel and leat which supplied the building, and uncover remains which may pre-date extant structures on the site. An appropriate level of archaeological monitoring should take place during all groundworks on the site.

This should be supported by a Written Scheme of Investigation (WSI) setting out the required programme of archaeological work. The WSI should be based on national standards and guidance and be approved by the Exmoor National Park Authority - Historic Environment.

If a Written Scheme of Investigation is not submitted prior to determination we would advise, for the above reasons and in accordance with section HE10 of the National Planning Policy Framework (2026) and Policies GP1, CE-S4 and CE-D3 (Cultural Heritage and Historic Environment) of the Exmoor National Park Local Plan 2011-2031, that any consent your Authority may be minded to issue should carry the condition as worded below. The required WSI would be for a staged programme of archaeological fieldwork including Historic Building Recording and Archaeological Monitoring.

No development shall take place until the developer has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation (WSI) which has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out at all times in accordance with the approved scheme as agreed in writing by the Local Planning Authority.

Reason
To ensure, in accordance with Policies GP1, CE-S4 and CE-D3 (Cultural Heritage and Historic Environment) of the Exmoor National Park Local Plan 2011-2031 and

Section HE10 of the National Planning Policy Framework (2026), that an appropriate record is made of archaeological evidence that may be affected by the development.

AND

The development shall not be brought into its intended use until the post-investigation assessment has been completed in accordance with the approved Written Scheme of Investigation. The provision made for analysis, publication and dissemination of results, and archive deposition, shall be confirmed in writing to, and approved by, the Local Planning Authority.

Reason
To comply with Section HE10 of the NPPF, which requires the developer to record and advance understanding of the significance of heritage assets, and to ensure that the information gathered becomes publicly accessible

Environment Agency – 28/10/2026
Environment Agency Position
Having reviewed the flood risk assessment (FRA) Issue 6 dated Oct 2026 by WCI we can now support its scope and findings. We are satisfied that the FRA now adequately demonstrates the flood risks and hazards the development site and its immediate environments are at risk from. Therefore, we remove our objection subject to the inclusion of the following planning condition.

Condition
Should your authority be mindful to approve permission then we strongly advise the following condition to be included:

No development approved by this permission shall commence until details of the provision of flood resilience/resistance measures have been submitted to and approved in writing by the local planning authority, following which they must be implemented in full and retained for the lifetime of the development.

Reason: To minimise the risk of internal damage occurring to the proposed residential properties in situations when an extreme flood is occurring thus enabling faster recovery and reoccupation following a flood.

Flood Risk – Advice to LPA
Your authority's decision should be based upon an understanding that flooding poses a risk to 'all, including emergency services' with regard to the potential combination of depth and velocity of flood waters for the access road off Bridge Street next to G.C. Stanbury and Son, and car parking spaces associated with the development, and also that there is a risk of internal flooding of the proposed residential properties occurring in 'extreme' circumstances.

The decision as to whether the proposed flood warning and emergency evacuation strategy measures being put forward would render users of the development as being safe over its lifetime rests with your authority's emergency planners; we expand on such below.

Flood warning and emergency response - advice to LPA
Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network. We therefore do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out this type of role /responsibility during a flood.

Planning practice guidance (PPG) states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a design flood and to evacuate before an extreme flood needs to be considered. One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise LPAs to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you refer to 'Flood risk emergency plans for new development' and undertake appropriate consultation with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with paragraph 181 (inc. footnote 63) of the NPPF and the guiding principles of the PPG.

We have considered the findings of the flood risk assessment in relation to the likely duration, depths, velocities and flood hazard rating against the design flood for the proposal.

We agree that this indicates that;

- a danger for all people (i.e. the general public including the emergency services) would arise in circumstances when the access road off Bridge Street next to G.C. Stanbury and Son, and car parking spaces associated with the development, is flooded.
- lead in times of impending flooding would be limited albeit the EA aim to provide a minimum 2 hours warning of flooding, or flood warning updates;
- the adoption of duration of flooding of 4 hours is realistic for the purpose of appraising whether the proposed emergency evacuation strategy would help render users safe from the flood risks associated with this proposal.
- We remind you to consult with your emergency planners and the emergency
- services to confirm the adequacy of the proposed emergency evacuation strategy.

Other considerations
We take this opportunity to highlight the below,

- the Environment Agency do not own any assets at the site,
- riparian rights and responsibilities will apply with regard to the leat. Such is important to recognise given the leat poses a pathway for flood waters,
- the Environment Agency hold discretionary powers to operate the sluice

- structures at the inlet to the leat and powers to rebuild/replace them but not a legal obligation to do so,
- we advise the developer establishes ownership and maintenance responsibilities associated with the leat and how such would be transferred, including any structures they will retain ownership of.

Devon and Somerset Fire and Rescue Service – 10/11/2026
With reference to your consultation concerning the above application, the details of the proposals have been examined and the following observations are made:-

1. Access and Facilities for the Fire & Rescue Service
Access and facilities for Fire & Rescue Service appliances should comply with provisions contained within Approved Document B Volume 1, Part B5 of the Building Regulations 2010.

For dwellinghouses, access for a pumping appliance should be provided to within 45m of all points inside the dwellinghouse and every elevation to which vehicle access is provided should have a suitable door(s), not less than 750mm wide, giving access to the interior of the building.

For flats, either of the following provisions should be made:

a) Provide access for a pumping applicance within 45m of all points inside each flat of a block, measured along the route of the hose. Every elevation to which vehicle access is provided should have a suitable door(s), not less than 750mm wide, giving access to the interior of the building. Door(s) should be provided such that there is no more than 60m between each door and/or the end of that elevation (e.g. a 150m elevation would need at least two doors).
b) Provide fire mains.

Access routes and hardstandings should comply with the guidance in Table 3.1 with dead-end access routes longer than 20m requiring turning facilities as in Diagram 13.1.

Please note that Table 13.1 of Approved Document B Volume 1 provides guidance on “Typical fire and rescue service vehicles”. Note 1 in this table highlights that not all fire appliances are standardised. For your information, Devon and Somerset Fire and Rescue Service uses fire appliances (pumps) and aerial (high reach) appliances with different dimensions and weights. For the latest sizes please refer to our website: https://www.dsfire.gov.uk/aout-us/fleet-and-equipment

Devon and Somerset Fire and Rescue Service – 12/11/2026
Thank you for your query, which has been forwarded to me following our consultation response regarding the adequacy of emergency escape arrangements from the premises in the event of flooding.

As the Fire and Rescue Service, our statutory responsibilities relate to fire safety matters. We do not have any legal jurisdiction regarding means of escape from premises due to flooding.

However, I have reviewed the mitigation measures proposed as part of the development, including the raising of electrical outlets and associated electrical infrastructure. In my opinion, these measures appear appropriate in helping to reduce the risk of electrical fires and electrocution during flooding events.

In the event that occupants become trapped as a result of flooding, the Fire and Rescue Service has operational procedures in place to respond to such incidents. Where required, specialist rescue capabilities can be deployed to assist in the safe rescue of occupants.

Representations

Total – Objections	Total – Support	Total – No Objections
4	1	8

Summary of comments:

The matters raised in support of the application include:

- Reuse of an existing/redundant building
  The proposal is supported as a positive reuse of a building currently seen as underused or detrimental to the townscape.
- Heritage and conservation benefit
  Comments emphasise that the scheme would preserve a historic structure and retain existing fabric, presenting it as a conservation-led development.
- Provision of housing
  The proposal is seen as delivering valuable housing, even though affordable housing is not provided.
- Design quality and efficient use of space
  The design is described as sensible, making effective use of the existing building volume while minimising harm or compromise to the original structure.
- Viability of conservation projects
  There is recognition that the costs and viability challenges associated with conserving historic buildings may limit the ability to provide affordable housing.
- Balanced support despite highway constraints
  Although parking and access concerns are acknowledged, the comments suggest these issues are not unusual for Dulverton and should not, in the respondent's view, justify refusal.

The matters raised in objection of the application include:

- Access constraints and highway safety
  A central concern is the narrow alleyway, tight access, vehicle turning, obstruction, and whether the site can safely accommodate construction traffic, residents, visitors, deliveries and emergency vehicles.

- Parking inadequacy and reliance on public car parks
  Several comments challenge the proposed parking provision, including whether spaces are usable, whether existing rights of access may be obstructed, and whether public car parks can legitimately be relied upon.
- Construction impacts and deliverability
  There are concerns that the applicant has not shown how construction would be managed, how long works would last, or how disruption, safety risks and effects on neighbours/businesses would be controlled.
- Emergency access and fire safety
  Respondents ask for evidence that emergency vehicles can reach, operate at and leave the site safely, both during construction and once occupied.
- Character, heritage and conservation harm
  The comments argue that modern interventions, increased residential activity and acknowledged harm to the listed building/conservation area need to be properly assessed and weighed.
- Drainage and sewerage capacity
  Objections raise uncertainty about the existing sewer pipework, its age, condition, route, ownership and capacity to serve additional residential use.
- Challenge to transport assumptions
  Respondents dispute the claim that residential use would generate less traffic than the former laundry, arguing that there is insufficient evidence to support that comparison.
- Financial viability concerns
  Several comments question the weight being given to viability, arguing that financial viability is not itself a planning justification and should have been assessed earlier by the developer.

Other matters raised include:

- Traffic, access and highway safety
  Concern about constrained access via Chapel Street, Bridge Street, the alleyway, the vet's car park, the garage area and "Duckpaddle". Commenters question whether these routes can safely accommodate construction traffic, deliveries, residents' vehicles and day-to-day servicing.
- Construction impacts on residents and businesses
  Several comments stress that construction would affect nearby homes and businesses, with calls for a Construction Traffic Management Plan to control disruption, safety risks, deliveries, vehicle movements and working arrangements.
- Parking inadequacy and pressure on town parking
  There is concern that the proposed parking is insufficient for the number of dwellings, especially given limited public transport, and that overspill parking would put further pressure on existing town car parks and streets.

- Ongoing operational access after completion
  Concerns are not limited to construction; respondents also question how future residents, visitors, deliveries, bin collections and maintenance vehicles would access the site without causing obstruction or disturbance.
- Heritage, character and materials
  Comments support the move to timber cladding as more in keeping with the area but also stress the need to preserve the character and appearance of the listed/former laundry building through appropriate materials, cladding, windows and detailed conditions.
- Flood risk
  The Environment Agency's concern about the adequacy of the Flood Risk Assessment is noted, particularly in relation to risks to proposed ground-floor accommodation.
- Affordable housing and principal residence restriction
  Several comments challenge the absence of affordable housing and suggest that, if viability prevents affordable provision, the dwellings should at least be restricted to principal residence use rather than second homes or holiday lets.
- Electric vehicle charging and sustainability
  One specific issue raised is the apparent lack of electric vehicle charging provision within the proposed parking bays.
- Refuse/bin collection practicality
  There is concern that the proposed bin storage and collection arrangements appear impractical, particularly if bins are to be collected from Chapel Street while stored at the rear of the main building.
- Design scale and safety details
  Comments question whether the proposed workshop is taller than the existing structure and raise safety concerns about the open leat/French doors/metal balustrade arrangement.
- Legal/maintenance uncertainty over access routes
  Some comments raise uncertainty over ownership, surface wear, repair responsibilities and future maintenance of the alleyway/access route.
- Alternative layout or reduced scheme
  A respondent enquires as to whether reducing the scheme by one dwelling (the workshop) could allow improved access, more parking, dual access or a one-way arrangement.

Planning Context
Exmoor National Park Local Plan 2011-2031 (inclusive of minerals and waste policies):

GP1	Achieving National Park Purposes and Sustainable Development
GP3	Spatial Strategy
CE-S2	Protecting Exmoor's Dark Night Sky
CE-S3	Biodiversity and Green Infrastructure
CE-S4	Cultural Heritage and Historic Environment
CE-D3	Conserving Heritage Assets
CE-S5	Principles for the Conversion or Structural Alteration of Existing Buildings
CE-S6	Design & Sustainable Construction Principles
CC-S1	Climate Change Mitigation and Adaptation
CC-D1	Flood Risk
CC-D5	Sewerage Capacity and Sewage Disposal
HC-S1	Housing
HC-S2	A Balanced Local Housing Stock
HC-S3	Local Occupancy Criteria for Affordable Housing
HC-S4	Principal Residence Housing
HC-D1	Vacant Buildings in Settlements
HC-D2	Conversions to Dwellings in Settlements
SE-S1	A Sustainable Exmoor Economy
SE-D2	Safeguarding Existing Employment Land and Buildings
HC-D19	Safeguarding Local Commercial Services and Community Facilities
AC-S1	Sustainable Transport
AC-S2	Transport Infrastructure
AC-D2	Traffic and Road Safety Considerations for Development
AC-D3	Parking Provision and Standards

The National Planning Policy Framework (NPPF) is a material planning material consideration for all applications and must be taken into account in decision-making from the day of its publication.

Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the Local Planning Authority in considering whether to grant planning permission for development which affects a listed building or its setting to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that the Local Planning Authority has a statutory duty with respect to any buildings or other land in a conservation area that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

Planning Considerations

The main planning considerations in this case are:

- whether the proposed development would be appropriate taking account of the sustainable economy policies of the Local Plan
- whether the proposal would be appropriate taking account of the housing strategy of the Local Plan
- the effect of development on the character and appearance of the building, which is Grade II listed, and its locality including Dulverton Conservation Area
- whether the development would be appropriate taking account of flood risk
- the effect of development on protected species and habitats
- the effect of development on highway safety
- the effect of development on residential neighbours living conditions, particularly in respect of privacy, construction impacts and noise

SUSTAINABLE ECONOMY

The Exmoor National Park Local Plan seeks to foster the economic and social wellbeing of local communities while conserving and enhancing the special qualities of the National Park. Policy GP1 requires development to support the function and resilience of communities, including through the protection and strengthening of employment opportunities. This reflects the wider sustainable-development objective of achieving a sustainable economy alongside social and environmental objectives.

The former Laundry has a longstanding commercial and employment history. The proposal would result in the permanent cessation of that employment use and conversion of the site principally to residential accommodation. The loss of the employment use therefore engages the Local Plan policies concerned with retaining existing employment premises and managing their change to alternative uses.

Policy GP3 of the Local Plan states that the spatial strategy aims to ensure that communities across the National Park continue to thrive so that they are economically resilient, environmentally sustainable, socially mixed and inclusive. To facilitate sustainable development across the National Park, development proposals should accord with the spatial strategy.

For the purposes of this Policy, the application site lies within the Local Service Centre (named settlement) of Dulverton. Clause 3(a) of Policy GP3 states that development within the named settlements, in this case Local Service Centres, should ‘strengthen the role and function of the Local Service Centres to sustain and improve the wide range of services and facilities, to serve the needs of the settlement and surrounding communities, address locally identified needs for

housing and improve employment prospects for the local area'. It also states new build development for local need affordable housing, business premises, and community services and facilities will be acceptable in principle where it is well related to existing buildings in the settlements.

Policy S4 of the NPPF relates to the principle of development within settlements. Paragraph 1 of the Policy states that 'development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework'.

Paragraph 2(a)(ii) of the Policy states that in applying Policy S4, the circumstances in which the benefits of approving development are likely to be substantially outweighed by adverse effects include (but are not restricted to) situations where the development proposal would have a substantial adverse impact in relation to the application of the policies in this Framework for protected landscapes, amongst other things.

Policy GP4 of the Local Plan relates to the efficient use of land and buildings and states that development proposals will be encouraged which demonstrate the efficient use of land and buildings including through b) the re-use of existing buildings within the built extent of the named settlements, or within or well-related to hamlets and farmsteads.

Policy L2 of the NPPF relates to making effective use of land and states that substantial weight should be given to the benefits where a development proposal would achieve one or more of the following, amongst other things:

a) remediating despoiled, degraded, derelict, contaminated or unstable land;
b) making better use of vacant and underutilised land and buildings (such as: by bringing back into residential use empty homes and other suitable buildings; converting space above shops; redeveloping underutilised retail and business sites; and building on or above service yards, lock-ups, car parks and other transport infrastructure which are no longer required);

Exmoor National Park Local Plan Policy SE-S1 seeks to strengthen and diversify Exmoor's economy, businesses and employment land. Clause 4 sets out that existing employment land and buildings will be safeguarded in accordance with Policy SE-D2.

Policy SE-D2 of the Local Plan sets out that development proposals that would involve the loss of employment land and/or buildings will not be permitted unless it can be demonstrated that the site and/or buildings cannot be continued or made viable in the longer term.

As such, Policy SE-D2 establishes a sequential approach to the loss of existing employment land and buildings. In broad terms, the Policy seeks first to retain suitable sites in an employment-generating use and requires evidence that realistic opportunities to achieve that outcome have been appropriately explored before a non-employment use is accepted.

Local Plan Policy HC-D19 (Safeguarding Local Commercial Services and Community Facilities) is also relevant insofar as the Policy framework requires consideration of suitable alternative commercial, or community uses before residential conversion is pursued

In respect of this application, both Local Plan Policies, SE-D2 and HC-D19, have similar requirements that the applicant is required to demonstrate, in terms of alternative uses, access to grant funding/financial support, viability and realistic marketing for a minimum period of 12 consecutive months. In this case, as the site is an employment site, Policy SE-D2 is considered to be the main Policy in this regard and therefore provides the focus for this section of this report.

The application details explain that the 'Dulverton Laundry ceased trading in 2018, was sold prior to auction later that year and then again in 2022. While in this period the property has not been marketed continuously for 12 months, no viable employment generating use of the complex has come forward, in part due to the condition and size of the building and its location, but also due to the prevailing economic conditions for successful business activity within the locality'.

The statement goes on to reference an Employment Land Review (Review) commissioned by the Authority in 2009. The Review included an assessment of 45 B Class employment sites. Dulverton Laundry, whilst still in operation at that time, was not one of them.

The submitted statement says that more widely the Review's summary and recommendations note that Exmoor has a high proportion of older people, an economy dominated by small scale businesses, with a focus on non-B Class sectors such as tourism and agriculture. The statement also sets out that the Review notes that a balance has been achieved between the supply of and demand for employment space.

Notwithstanding that, it is recognised that the Employment Land Review was carried out in 2009 and conducted to inform the Local Plan in terms of Policy making. It is not site specific and is now over 16 years old. In other words, the Review does not assess the suitability of the former laundry as an on-going employment site within Dulverton, or whether there is a market demand for such use.

The applicant does not dispute that they proposed change of use and loss of the former laundry building in an economic use, as proposed, would not satisfy Local Plan Policy SE-D2, because it has not been marketed in accordance with the Policy requirements.

Nevertheless, the applicant advises that the site brings with it substantial additional costs relating to both flood risk and the need to respect its status as an important historic building. They state that the cost of an employment led scheme in relation to the potential return would be immense and that the amount of grant or other financial support necessary to bridge this gap would be disproportionate to the amount of employment space that could be delivered. The applicant is not aware

of any support that could have a material impact upon the viability of an employment led proposal.

There have been periods when the building has been marketed, although details of the marketing has not been submitted in support of the application. It has been in different ownerships and has remained unoccupied since 2018.

There is no dispute that the building requires significant investment and, as a Grade II listed building, is subject to constraints which affect the nature and extent of works which can appropriately be undertaken.

Nevertheless, these are challenges faced whether or not the building remains in employment use.

The evidence that an employment use may be difficult or financially challenging is not, in itself, equivalent to demonstrating compliance with Local Plan Policies SE-D2 including in terms of reasonable marketing for a minimum period of 12 months and the sequential requirements.

The submitted evidence does not demonstrate the full marketing period required by the adopted Policy. Nor does the evidence presently before the Authority demonstrate with sufficient clarity that each stage of the Policy sequence, including realistic alternative employment-generating and other qualifying uses, has been exhausted before residential use is pursued. The proposal therefore needs to be distinguished from a conclusion that no economically productive use of the building is possible.

National policy also seeks to build a strong and effective economy as part of sustainable development. The NPPF identifies the economic objective of sustainable development as helping to build a strong, responsive and competitive economy, including ensuring that land of the appropriate types is available to support growth, innovation and productivity. That national objective is complementary to, rather than a replacement for, the more locally specific requirements of the adopted Local Plan.

There is therefore evidence suggesting practical and financial obstacles to securing renewed employment use of the former Laundry, and this carries weight in the assessment. However, the evidence presently submitted does not demonstrate compliance with the specific sequential, marketing and evidential requirements of Local Plan Policies SE-D2. The residential conversion would therefore result in the loss of employment premises without the Policy requirements governing that loss having been fully satisfied. As such the proposal is contrary to Policy SE-D2 of the Local Plan.

HOUSING STRATEGY

In terms of the Housing Strategy, paragraph 6.1 of the adopted Local Plan states that the housing policies provide the framework to address the housing needs of the National Park's local communities and that 'the focus is on addressing the needs of those people who live and work in the area, prioritising the need for

affordable housing and ensuring that the National Park's housing stock as a whole meets the needs of all sections of the local community'.

Paragraph 6.52 of the Local Plan states that 'within the National Park, policies provide for new housing as an exception to normal policies of restraint'.
Clause 1 of Policy HC-S1 (Housing) states, amongst other things that:

'The purpose of housing development will be to address the housing needs of local communities. The principal community identified need is for affordable housing with local occupancy ties. Exceptionally, new housing development will be permitted where it addresses an identified local housing need for; a) affordable homes that remain affordable in perpetuity, and which will be occupied by local persons in proven housing need in accordance with the local occupancy definition in HC-S3'.

Clause 3 of HC-S1 says that 'consistent with an exceptions approach to housing, provision will not be made for housing solely to meet open market demand, and housing land will not be allocated in the development plan. The Policy goes on to say that Principal Residence market housing will only be permitted where:

a) it is essential to deliver local need affordable housing in a Local Service Centre or Village to meet an identified local need, and it accords with Policy HC-S4; or
b) the proposal relates to a Vacant Building in a Local Service Centre or Village (HC-D1)'.

The Local Plan, therefore, seeks that all new housing must meet an identified local need for affordable housing and be lived in by people who meet the local occupancy criteria in perpetuity. The Plan must be read as a whole. Policies HC-S1, HC-S4 and HC-D2 require that market dwellings would only be acceptable where they deliver affordable housing in a local service centre or village.

Policy HC-D1 of the Local Plan relates to "Vacant Buildings in Settlements". The Policy provides a tightly controlled route for a vacant building within a settlement to become Principal Residence market housing, rather than affordable housing.

HC-D1 allows Principal Residence market housing only exceptionally, either by:

- change of use/conversion of an existing vacant building; or
- redevelopment of a vacant building.

It is therefore not a general permission for vacant buildings to become unrestricted market housing. The proposal first has to satisfy the Policy's vacancy, location, affordable housing and viability tests, as well as the relevant requirements of HC-S1.

To accord with Local Plan Policy HC-D1, the proposal would need to satisfy all the relevant tests in Clause 1b. of the Policy, including that there is clear and robust evidence showing that affordable housing cannot be provided on the site or as part of the development, that the building is not abandoned, and that it has been unoccupied, without content and has been marketed for a minimum of 3 years.

The Policy is structured to prevent vacancy becoming an easy route around the Local Plan's affordable housing objectives. Principle Residence market housing only becomes available where robust evidence demonstrates that affordable housing cannot viably be provided.

In this context, the nature, continuity, price and scope of marketing are important to determining whether a proposal demonstrates satisfies the requirements of Policy HC-D1 of the Local Plan.

Whilst the building has been marketed since 2018, this has been for limited periods, and the applicant has owned the building since 2022. On the evidence submitted, the building has not been marketed continuously for the minimum three-year period required by Policy HC-D1 and only very limited details of marketing have been provided. The proposal therefore fails to satisfy this criterion of the Policy and, notwithstanding the viability evidence, does not presently demonstrate that it qualifies for the exceptional Principal Residence market housing route provided by Policy HC-D1 of the Local Plan.

The NPPF identifies the provision of a sufficient number and range of homes to meet the needs of present and future generations as one of the social objectives of sustainable development. Its housing policies also support the delivery of homes and require appropriate weight to be given to housing which responds to evidenced accommodation needs.

There is therefore national policy support for the principle of delivering additional housing and considerable relevance in the evidence of identified housing need in Dulverton. However, the NPPF does not displace the statutory development-plan starting point. The application must continue to be assessed principally against the more locally specific housing strategy in the Exmoor National Park Local Plan, with national policy treated as a material consideration.

The applicant has submitted a viability assessment alongside the application. The viability assessment sets out that the scheme cannot afford to contribute any form of affordable housing or financial contribution.

The Authority, at the expense of the applicant, commissioned an independent financial viability review (FVR) of the viability assessment submitted. This was carried out by Vickery Holman in April 2026. The FVR concluded that whilst areas of disagreement were identified with certain inputs and assumptions within the viability assessment submitted, the FVR confirms that, in line with the submitted viability assessment conclusions, the proposed development is not viable and generates a negative profit. On that basis, it is their opinion that there is no financial headroom to support any planning obligations for affordable housing in this case.

Officers have queried whether there is grant funding and/or the ability to work with Registered Housing Providers/Social Landlords to enable the provision of affordable housing within the scheme.

The agent has advised that they have not pursued this for a number of reasons and, mainly because there are limitations with the project around financial viability. Furthermore, it is their view that a Registered Housing Provider would not wish to be a partner within the scheme due to the constraints of the site, limitations in design, space and layouts. Officers have no evidence to dispute this and are not aware of a Registered Housing Provider that would wish to partner in the scheme and who would be able to access grant funding.

NPPF Policy DM5 refers to Development Viability. It states, amongst other things that, there may be circumstances in which a viability assessment demonstrates that it would not be possible for development to proceed on a policy compliant basis. In such circumstances, the submission of a viability assessment as part of a development proposal may be justified to ensure that the proposed development makes the maximum possible contribution to affordable housing and other infrastructure.

However, the NPPF does not say that a viability assessment automatically provides a general basis for departing from other substantive development-plan requirements, such as the separate vacancy and three-year marketing tests under Policy HC-D1. Planning law and paragraph 3 of the NPPF continue to require the application to be determined in accordance with the development plan unless material considerations indicate otherwise.

Overall, whilst the proposal would contribute additional housing and the independently reviewed viability evidence supports the applicant's case that the development cannot support affordable housing or an affordable housing contribution, viability is only one element of the policy assessment. The Local Plan establishes an exceptions-based approach to new housing, directed principally towards meeting the identified affordable housing needs of local communities, and Policy HC-D1 provides only a tightly defined exception through which a vacant building may provide Principal Residence market housing.

The evidence indicates that, although the building has been marketed at various points since 2018, it has not been continuously marketed for the minimum three-year period required by Policy HC-D1. The proposal therefore does not satisfy all of the requirements necessary to engage that Policy exception. The identified housing benefits and the conclusions of the independent viability review are material considerations to be weighed in the planning balance, but they do not in themselves demonstrate compliance with Local Plan Policies HC-S1, HC-S4, HC-D2 and HC-D1, which together provide an exceptions-based approached to new housing, directed principally towards meeting the identified affordable housing needs of local communities. Accordingly, there remains a material conflict with the Local Plan's housing strategy which should be weighed against the housing and other benefits of the proposal, having regard to the development plan as a whole and the relevant national decision-making policies in the NPPF.

CHARACTER AND APPEARANCE OF THE SITE AND BUILDING INCLUDING EFFECT ON HERITAGE ASSETS

The application site comprises the former Dulverton Laundry, a Grade II listed building situated within the Dulverton Conservation Area. The former mill is also recorded on the Historic Environment Record, while the leat associated with the site's former industrial operation is itself of historic interest. The building and its surroundings are therefore subject to a high level of heritage sensitivity.

In considering the application, the Authority is required to have special regard to the desirability of preserving the listed building, its setting and those features of special architectural or historic interest which it possesses, together with the statutory duties relating to conservation areas.

Policy GP1 of the Exmoor National Park Local Plan requires sustainable development within the National Park to conserve and enhance its natural beauty, wildlife and cultural heritage and its special qualities. Policies CE-S4 and CE-D3 provide the principal Local Plan framework for the historic environment. In relation to conservation areas, CE-D3 requires development to preserve or enhance their character or appearance and to deliver high-quality design using materials which reflect their scale, architectural quality and detailing. Development affecting heritage assets and their settings should positively respond to those assets through sensitive design and avoid unacceptable adverse and cumulative effects.

Policies CE-S5 and CE-S6 are also directly relevant. The Local Plan recognises that the adaptive reuse of existing buildings can contribute to sustainable development but requires conversion of traditional buildings to respond sympathetically to their intrinsic quality, character and appearance. The supporting text specifically identifies windows as an important consideration and states that existing windows should generally be repaired and retained or replicated where retention is not possible. CE-S6 requires materials and design elements used in conversion schemes to complement the local context through traditional and natural sustainable materials.

At national level, the NPPF identifies heritage assets as an irreplaceable resource whose significance should be conserved for the benefit of existing and future generations. The relevant national decision-making policies are contained within Chapter 20 of the August 2026 Framework and must be considered alongside the development plan and the statutory duties relating to listed buildings and conservation areas.

In accordance with NPPF Policy HE4. 2. any harm to, or loss of, the significance of a designated heritage asset (including from development within its setting) should have a clear and convincing justification in accordance with the policies in Chapter 20.

Policy HE6 of the NPPF requires amongst other things that substantial weight should be given to the heritage asset’s conservation. This is irrespective of whether any potential effect amounts to a positive effect, harm, substantial harm,

or total loss of its significance. And any harm will be a matter of considerable importance and weight.

Where a development proposal would harm the significance of a designated heritage asset, in accordance with Clause 4 of NPPF Policy HE6, this should be weighed against any public benefits resulting from the proposal. Important public benefits can include securing the long-term reuse of a vacant or underused listed building.

Policy DP3 of the NPPF relates to the key principles for well-designed places and Paragraph 1 of the policy states that development proposals should respond to their context (the history, character and features of their site and its setting), so that they integrate with and enhance their surroundings; such as through the arrangement of development plots and buildings, the use of materials and architectural features, and the restoration, reuse and integration of heritage assets. This should not preclude innovation or change where appropriate, especially where an increased scale or density of development is justified in accordance with policies L2 and L3 of the NPPF.

Paragraph 3 of Policy DP3 of the NPPF states that development proposals should be refused if, without clear justification, they conflict with paragraph 1 of this policy or relevant aspects of the principles in paragraph 2 and that substantial weight should be given to compliance with relevant development plan policies when assessing the design quality of proposals.

The former Laundry is important both individually as a Grade II listed building and for the contribution it makes to the Dulverton Conservation Area.

The evidence submitted with the application and the specialist consultation responses identify the principal building as an early nineteenth-century industrial building, originally constructed as a silk or crepe mill and subsequently used as a laundry for more than a century. Its three-storey rubble-stone form and unusually extensive fenestration reflect its original manufacturing function, when high levels of natural light were necessary within the working floors. The relationship between the solid stone piers and extensive areas of glazing is therefore integral to understanding the building's historic function and architectural interest.

The building is also unusually prominent within the Dulverton Conservation Area. Its three-storey scale distinguishes it from much of the surrounding historic townscape and it makes a positive contribution to views along Chapel Street and towards the Conservation Area from the west. Its significance therefore derives not only from its surviving historic fabric, but from its architectural form, industrial character, fenestration and contribution to the wider townscape.

There is substantial agreement between the heritage consultees that an appropriate residential conversion is capable, in principle, of providing a viable long-term use for the building.

The Authority's Senior Heritage Officer acknowledges the importance of securing a sustainable future for the building, which has been unused since 2018 and is

included on the Authority's Buildings at Risk Register. Historic England similarly welcomes the intention to find a new use for the listed building and accepts that the site has the capacity to accommodate an appropriate residential scheme. The Georgian Group also does not object to the principle of residential conversion.

There is consequently an important heritage benefit in securing the repair, active use and long-term maintenance of the building. The Local Plan itself recognises the sustainability benefits that can arise from adaptive reuse of existing historic buildings rather than demolition and replacement.

The principle of conversion does not, however, provide justification for alterations which would cause avoidable or inadequately justified harm to the significance of the listed building or Conservation Area.

The development includes alterations to the ancillary workshop and boiler-house ranges, including the introduction of first-floor accommodation.

Historic England has expressed concern that the increased massing of the north range would erode views towards the principal mill building on the approach along Chapel Street and consequently harm the character of the Conservation Area. The Authority's Senior Heritage Officer takes a different view, noting evidence that the workshop was formerly a two-storey structure with a dual-pitched roof and considering its reinstatement to represent a benefit.

Having considered the respective specialist views and the relationship between the ancillary ranges and principal mill building, Officers consider that the altered workshop and boiler-house ranges would remain subservient to the principal listed building. Their form, scale and massing would not, in themselves, result in an unacceptable effect upon the significance of the listed building or the character or appearance of the Conservation Area.

The amendment from zinc to timber cladding to the boiler-house extension is also an improvement. Historic England considers timber significantly less visually jarring in the Conservation Area, while the Local Plan supports the use of natural materials that respond to local context.

The proposed photovoltaic panels would provide renewable energy for the residential development. Although their installation would introduce modern equipment to the roof of the listed building, the Authority's Senior Heritage Officer considers that their visual impact would be limited because views of the relevant roof slope are restricted. Subject to appropriate detailed design and installation, Officers consider that the photovoltaic panels would not cause unacceptable harm to the significance of the designated heritage assets.

The development also has archaeological implications arising from demolition, alterations to the standing structures and groundworks close to the historic leat and former waterwheel arrangements. The Authority's Historic Environment advice recommends a staged programme comprising appropriate historic building recording, monitoring during alteration works and archaeological monitoring of groundworks, secured through a Written Scheme of Investigation. These

requirements could be secured by appropriately worded conditions if permission were otherwise granted.

The principal outstanding heritage issue is the proposed treatment of the fenestration.

The existing pattern of multipaned windows is one of the defining features of the former mill and directly expresses its industrial origins and historic requirement for extensive natural lighting. Although the building has undergone alteration and some windows date from later phases, surviving small-pane casements form an important element of its architectural character and significance.

The proposal would replace the existing windows with 48mm triple-glazed aluminium composite units without glazing bars and would introduce aluminium spandrel panels between the windows. The proposed units differ materially in form, detailing and material from the characteristic multipaned timber fenestration.

This is inconsistent with the approach to traditional buildings established by the Local Plan. The supporting text to CE-S5 expects existing traditional windows to be repaired and retained where possible and, where that is not possible, replicated. Particular attention is also required where fenestration is publicly visible, and any alternative material must achieve an appropriately high-quality appearance which complements the building and does not adversely affect heritage significance.

The Authority's Senior Heritage Officer objects to the proposed window treatment and considers that it would introduce a substantially more domestic appearance to the former industrial building. Alternative approaches have been identified during consideration of the application, including timber windows, vacuum glazing, alternative glazing arrangements and potentially appropriately detailed metal windows. The applicant has nevertheless elected to proceed with the aluminium composite system.

Historic England also maintains concern about the extensive replacement of the existing fenestration and considers that the modern aluminium windows would detract from the character of both the listed building and the Conservation Area. The Georgian Group takes a stronger position and considers that, cumulatively with the proposed internal alterations, the loss and replacement of the characteristic fenestration would result in substantial harm to the significance of the listed building.

For the purposes of this application, Officers consider that the wholesale replacement of the characteristic multipaned fenestration with aluminium composite triple-glazed units, together with the introduction of aluminium spandrel panels, would harm the architectural and historic significance of the Grade II listed building. It would diminish the relationship between the building's architecture and its former industrial function, introduce a more domestic character to its principal elevations and weaken the positive contribution that the building makes to the character and appearance of the Dulverton Conservation Area. The proposal would therefore harm the significance of these designated heritage assets.

In accordance with the relevant Local Plan policies and NPPF policies, where a development proposal would harm the significance of a designated heritage asset, the effect on the asset and its significance should be weighed against any public benefits resulting from the proposal.

The heritage assessment involves competing considerations.

Significant weight should be attached to securing the repair and long-term beneficial use of the Grade II listed former Laundry. It has been unused since 2018, is on the Authority's Buildings at Risk Register and requires substantial investment. Bringing it back into active use would constitute an important heritage and sustainability benefit. The Local Plan positively recognises the contribution that appropriate adaptive reuse can make to the long-term future of traditional buildings.

Against this must be weighed the harm arising principally from the proposed fenestration and aluminium spandrel treatment. The evidence demonstrates that fenestration is not an incidental feature of the building but an important expression of its architectural and industrial significance. Less harmful approaches have been discussed during the application process but have not been incorporated into the submitted scheme.

The heritage benefit of securing a viable long-term use for the former Laundry therefore attracts significant weight. However, that benefit must be balanced against the identified harm to the significance of the same designated heritage asset and to its positive contribution to the Dulverton Conservation Area. The fact that residential conversion may represent an appropriate means of securing the building's future does not, in itself, justify avoidable harm arising from the detailed design of that conversion.

Whilst the applicant states it would not be financial viable to incorporate a different window design and traditional materials, and while they have provided quotations setting out the cost of different window designs and materials, the applicants own viability assessment outlines that their preferred scheme is not financially viable and there is no assessment of whether savings can be made elsewhere in the scheme in order that suitable fenestration can be achieved. Therefore, Officers are not satisfied that less visual harmful fenestration design and materials cannot be secured. Consequently, the harm that would arise from the proposed development cannot be considered justified and would not be outweighed by the identified public benefits associated with the scheme.

The proposal would therefore conflict with Policies GP1, CE-S4, CE-D3, CE-S5 and CE-S6 of the Local Plan insofar as those policies seek to conserve the significance, architectural character and traditional appearance of heritage assets through sensitive design, materials and detailing. There would also be conflict with NPPF Policies HE4, HE6 and HE9.

FLOOD RISK

Policy CC-D1 of the Exmoor National Park Local Plan relates to flood risk and seeks to ensure that development is appropriately located and designed having regard to flood risk, including the effects of climate change. Policy CE-S6 also requires development to be future-proofed against climate change impacts, including flood risk.

The application site is wholly within Flood Zone 3. The site is, therefore, identified as having a high risk of flooding. The proposal involves the conversion of the existing buildings to residential accommodation, including residential use at ground-floor level.

The NPPF addresses development in areas at risk of flooding through Policies F5 to F8. Policy F6 applies to development within Flood Zones 2, 3a and 3b and requires development to be compatible with the relevant level of flood risk and, where applicable, to satisfy the exception test.

Policy F7 is particularly relevant to the consideration of safety. It requires development not to present a risk from flooding to potential occupiers, users or visitors, or increase flood risk elsewhere. Where development is proposed in an area known to be at risk of flooding, it should be refused unless, amongst other matters, the development would be safe throughout its lifetime, residual risk can be safely managed, safe access and escape routes are included where appropriate as part of an agreed emergency plan, appropriate flood-resistance and resilience measures are incorporated, and flood risk is not increased elsewhere.

A Flood Risk Assessment (FRA) has been submitted and subsequently revised during consideration of the application. Following its initial assessment, the Environment Agency objected because it considered that the flood risks associated with the site had not been adequately demonstrated, with particular concern regarding the safety of future occupiers and the use of the ground floor for residential accommodation.

Further information was subsequently provided and the FRA was updated. Issue 6 of the FRA, dated October 2026, identifies a design flood level of 135.51m AOD and assesses the expected flood depths, access and egress arrangements and proposed resilience measures. The FRA proposes that flood depths within the ground-floor dwellings would not exceed 600mm and that the four properties with the lowest ground-floor levels would have access to upper floors. Flood-resilience measures, surface-water management, flood warning and emergency evacuation arrangements are also proposed.

Following consideration of the revised FRA, the Environment Agency withdrew its technical objection on 28 October 2026. It confirmed that it was satisfied that the revised FRA adequately demonstrates the flood risks and hazards affecting the site and its immediate surroundings. It nevertheless recommends that, should permission be granted, a pre-commencement condition requires details of flood resilience and resistance measures to be submitted, approved and thereafter implemented and retained for the lifetime of the development.

The withdrawal of the Environment Agency's objection does not, however, resolve all matters relevant to the safety test in Policy F7. The Environment Agency specifically advises that flooding of the access road from Bridge Street and the proposed parking area would give rise to a danger for all, including the emergency services, and confirms that there remains a residual risk of internal flooding during extreme events. The Environment Agency also advises that warning lead-in times may be limited and considers a four-hour duration of flooding to be realistic for assessing the emergency evacuation strategy.

Importantly, the Environment Agency states that the judgement as to whether the proposed flood-warning and emergency-evacuation measures would ensure that future occupiers are safe throughout the lifetime of the development rests with the Authority, informed by Somerset Council emergency planners and, as appropriate, the emergency services. This directly engages NPPF Policy F7, which requires residual flood risk to be safely managed and safe access and escape arrangements to be provided where appropriate as part of an agreed emergency plan.

In terms of the sequential approach, the proposal relates to the reuse of an existing Grade II listed building and could not reasonably be relocated to another site without losing the principal purpose and heritage benefits of the scheme. In considering the exception test, the long-term repair and reuse of a vacant listed building, the provision of additional housing within Dulverton, and the reuse of existing built fabric represent sustainability benefits relevant to the assessment.

The revised FRA demonstrates that flood risk to the buildings can be addressed through proposed resilience and resistance measures, and the Environment Agency no longer objects to the development on technical flood-risk grounds. The proposed surface-water strategy would also introduce sustainable drainage measures and provide an improvement over the existing uncontrolled arrangements. These matters weigh in favour of the proposal's compliance with Local Plan Policy CC-D1 and the relevant national flood-risk policies.

Further to the recommendation of the Environment Agency the Civil Contingencies Unit at Somerset Council, the Avon and Somerset Police and the Devon and Somerset Fire and Rescue Service (DSFRS) have been consulted.

The Civil Contingencies Unit have not commented. The Avon and Somerset Police have commented in so far as they consider this to be a matter for the Fire and Rescue Service.

The Fire and Rescue Service have commented in relation to ensuring that the proposed development in terms of access and facilities for the service should comply with the provisions contained within Approved Document B Volume 1, Part B5 of the Building Regulations 2010. These provisions include access for pumping appliances, sufficient turning space for dead-end access routes longer than 20 metres and hardstandings.

In addition, the Fire and Rescue Service have reviewed the mitigation measures proposed as part of the development, including the raising of electrical outlets and associated electrical infrastructure and consider that these measures appear appropriate in helping to reduce the risk of electrical fires and electrocution during flooding events.

They also state that in the event that occupants become trapped as a result of flooding, the Fire and Rescue Service has operational procedures in place to respond to such incidents. Where required, specialist rescue capabilities can be deployed to assist in the safe rescue of occupants.

Planning Practice Guidance (PPG) (Paragraph 005) is clear in that when determining whether a proposed development will be safe for its lifetime the following should be assessed:

- the characteristics of a possible flood event,
- the safety of people within a building if it floods
- The safety of people around a building and in adjacent areas, including people who are less mobile or who have a physical impairment. This includes the ability of residents and users to safely access and exit a building during a design flood and to evacuate before an extreme flood.
- the structural safety of the building; and
- the impact of a flood on the essential services provided to or from a development.

Paragraph 043 of the PPG sets out that ‘one of the considerations to ensure that any new development is safe, including where there is a residual risk of flooding for flood risk management infrastructure, is whether adequate flood warnings would be available to people using the development. An emergency plan will be needed wherever emergency flood response is an important component of making a development safe’.

Access/egress from Bridge Street to the site and the car park has a flood hazard rating (using both the flood depth and velocity) as a ‘danger for all’, which includes emergency services. It would not therefore provide safe access or egress from the development in a flood event.

Therefore, in order to manage the flood events where there is a danger, the applicant proposes that safe access and exit points would be provided from the access point along Chapel Street, including for emergency services, where there is a dry route of escape.

The FRA includes an emergency evacuation strategy and states:

- Emergency evacuation routes will be eastwards towards Chapel Street with its higher topography and then onwards in a southeast direction towards the Dulverton Tennis Club. Residents egressing the three-storey mill will utilise the common parts to reach the Ground Floor entrance door and turn right along the footpath towards Chapel Street.

- Residents egressing the Workshop will turn left onto the same pedestrian link and move towards the higher ground on Chapel Street.
- Residents of Boiler House 1 and 2 have two routes available in an emergency egress scenario. On exiting both properties residents can turn left along the pedestrian link that runs around the south elevation of the development leading directly to the higher ground on Chapel Street. Alternatively, they can turn left and move westwards towards the car park and then northwards towards the pedestrian link between the mill and the workshop. In a flood scenario this is less likely as the first route is the quickest and shortest route to higher ground.
- The routes will be clearly sign posted through site directing people away from the current access road to Bridge Street, which will not be a designated evacuation route from site due to its low-lying topography and flood hazard rating.
- Both proposed Boiler House units and the Workshop benefit from first floor bedroom accommodation. In the event of a flood these will provide temporary safety. Equally, this means that residents will be at the higher level during the time of most risk when they are asleep. Apartments 1 and 2 have finished floor levels 245mm below the design flood level and this would be within the range of depth of water acceptable to the Environment Agency and would not hinder people leaving the apartments or exiting via the staircase from the apartments on the upper floors.
- The FRA sets out that a drainage strategy in relation to surface water drainage will be implemented that will look to improve the existing scenario and reduce flood risk through surface water flooding.

Flood preparation and warning advice is also set out in the submitted FRA with links to Somerset Council guidance and signing up to Environment Agency flood alert service.

Having considered the information submitted and the consultation responses received, particularly those of the Environment Agency and the emergency services, Officers are satisfied that the flood-resistance and resilience measures proposed are appropriate, that satisfactory safe access and escape routes in the event of a flood can be achieved as set out in the submitted emergency evacuation strategy, residual risk can be safely managed, flood risk is not increased elsewhere, and the submitted drainage strategy seeks to improve the existing scenario and reduce flood risk through surface water flooding.

Overall, it is considered that, through the measures set out within the submitted FRA and emergency evacuation strategy, the development would be safe throughout its lifetime in accordance with Policy F7 of the NPPF. Officers are also satisfied that the development is appropriately designed having regard to flood risk

including the effects of climate change and that the development complies with Policy CC-D1 of the Local Plan.

PROTECTED SPECIES AND HABITATS

Policy CE-S3 of the Local Plan relates to biodiversity and green infrastructure and states that the conservation and enhancement of wildlife, habitats and sites of geological interest within the National Park will be given great weight.

Policy N2 of the NPPF relates to improving the natural environment and Paragraph 1 (f & g) states that to contribute positively to the natural environment and support nature's recovery, development proposals should:

f) Minimise any adverse impacts on biodiversity and include features which support priority or threatened species such as swifts, bats and hedgehogs. Development proposals should incorporate integrated nest boxes (commonly known as swift bricks) into their construction unless there are compelling technical reasons which prevent their use, or would make them ineffective; and
g) Ensure that green infrastructure and other features to support nature are located and designed to minimise risk of future failure, and that appropriate measures are in place or any necessary long-term management.
An Ecological Impact Assessment (EcIA) dated September 2025 has been submitted alongside the application.
The site comprises the disused stone mill building with connected boiler house and workshop. A culverted leat runs underneath the mill building and drains into the River Barle around 30m from the site.

The EcIA recommends pollution prevention measures to avoid harm to adjacent/retained habitats, particularly the Mill Stream are required and should be detailed in a Construction Ecological Mitigation Plan. Sensitive lighting during construction and operation of the site is also important to avoid harm to species associated with the SSSI habitats.

Despite lying only 400m from the site, it does not fall within the bat consultation zone for the Exmoor & Quantock Oakwoods SAC. The EcIA considers that impacts on the populations of Barbastelle and Bechstein's bat which are qualifying features are therefore unlikely. It is also noted that neither species was recorded during surveys and the site offers sub-optimal foraging habitat for bats as it is mainly hard-standing, surrounded by buildings with lighting.

Surveys have confirmed the presence of low numbers of roosting lesser horseshoe, serotine, common pipistrelle and soprano pipistrelle day roosts and a lesser horseshoe hibernation roost. A licence would need to be obtained from Natural England prior to the start of works which would otherwise cause an offence due to the destruction and/or modification of these roosts as a result of proposals.

The applicant proposes mitigation including sensitive timing of works (to avoid the hibernation roost), supervision of works and mitigation and compensatory roosts: a dedicated bat loft retaining (modified) the lesser horseshoe and soprano pipistrelle day roosts with appropriate access; a squeeze box in the bat loft for serotines;

three ridge gaps and four bat access slates for common pipistrelles. Two additional slates/boxes will be provided as enhancement. Lighting will be minimised.

Swift, wren and jackdaw were recorded nesting within the roof of the building, which offers numerous other opportunities. The vegetation around the site (mainly scrub) also provides suitable nesting opportunities.

The EcIA recommends vegetation clearance will be timed to avoid the nesting bird season or will require a nesting bird check by an experienced ecologist. Three general purpose bird boxes would be provided to compensate for the loss of nesting opportunities as well as two swift boxes for enhancement.

Otter are known to use the River Barle and it is likely that they use the mill stream. However, no evidence of their presence was recorded on site.

Good practice is recommended to be followed during work to prevent harm, such as providing ramps to allow animals to exit excavations (or covering them if deep) and capping pipes.

The removal of the bee nest should be undertaken by a registered professional when the bees are inactive.

Montbretia, a Schedule 9 species, has been recorded adjacent to the site (off-site) and must be appropriately managed to avoid spread of this species, which would cause an offence.

The documents submitted set out that the application site supports ten bat roosts of Site importance and one of District importance. The proposed works will result in destruction of a lesser horseshoe bat, serotine bat, common pipistrelle bat and soprano pipistrelle bat day roost, as well as a lesser horseshoe bat hibernation roost. An EPS bat licence will be required before commencement of works.

Indicative mitigation and compensation for these impacts have been provided, avoidance measures and careful timing of works have been incorporated into the design to eliminate impacts to bats and other protected species including nesting birds, otter and hedgehog, as well as aquatic fauna associated with the mill stream and nearby River Barle.

This Authority's Senior Ecologist has commented on the application, raises no objection and sets out a list of conditions should planning permission be granted.

Provided the avoidance, timing of works and mitigation measures are carried out, the proposal is considered unlikely to have significant adverse effects on ecological features.

The proposed development is subject to the statutory Biodiversity Net Gain (BNG) requirements and a statement and assessment have been submitted.

This Authority's Senior Ecologist has commented on the statement and assessment as states 'The report discusses significance and refers to the Local

Nature Recovery Strategy and Somerset Council guidance and concludes that the development is not providing 'significant BNG'. However, referring to the Technical Guidance Note for BNG on Exmoor, the site's position within close proximity to designated sites, does deem the development 'significant'. This should be reconsidered prior to submission of a Biodiversity Gain Plan (BGP) pre-commencement.

Whilst 10% BNG is not achievable on site, the project team have sought to follow the BNG hierarchy and seek gains on site, where possible, acknowledging the limitations of the site. The proposal therefore includes the purchase of BNG units from a habitat bank - details on what will be purchased is required alongside the BGP at pre-commencement stage and what is registered and allocated must be confirmed'.

Having regard to the technical reports and ecologist advice, the development, through the use of appropriate licences, conditions, mitigation and enhancements, would not have an unacceptable adverse impact on protected species and habitats. The proposed development would therefore accord with Policy CE-S3 of the Local Plan.

HIGHWAY SAFETY

Policies AC-S1, AC-S2, AC-D2 and AC-D3 of the Local Plan relate to transport requirements, traffic levels and parking provision.

Policy AC-D2 of the Local Plan states that development, which will cause unacceptable levels of traffic in terms of the environmental or physical capacity of the local road network, or would prejudice road safety interests, will not be permitted.

Policy TR3 of the NPPF relates to locating development in sustainable locations and states so that development is located where it can support sustainable patterns of movement, enable good accessibility for different users and make the most of existing and proposed transport infrastructure, development proposals should reflect the principles set out in points a-e of Paragraph 1 of the Policy.

The site currently consists of a former commercial Laundry. The commercial use of the building would change to domestic properties. The submitted plans show that the property and its parking will be accessed via an existing access off Bridge Street. The existing access also serves a vehicle garage and a veterinary practice. There is an existing vehicular access on Chapel Street that is narrow but also serves other residential properties and community buildings/facilities (church, sports field, tennis courts and the sewage works). The submitted plans do not show a vehicular access into the site from Chapel Street.

The access off Bridge Street is narrow and there is visibility directly into the car park area. As noted above the access does serve other properties as well as the existing laundry building. Bridge Street lies within the 20mph zone that covers the town centre, as such It is considered that there would likely be low traffic speeds.

Policy AC-D3 ‘Parking Provision and Standards’ seeks to ensure that development within Exmoor National Park makes appropriate provision for parking for multiple vehicle types, stating that:

1. Proposals will be permitted where they make appropriate provision for parking including for bicycles, motorcycles, disabled users and car sharing, guided by the standards set out in Table 9.1.
2. Parking provision should take into account environmental constraints, be well designed and integrated with a high quality environment.
3. Developments in more sustainable locations that are well served by public transport or have good walking and cycling links will be considered appropriate for lower levels of car parking provision or in appropriate cases, no car parking provision. Proposals for higher levels of cycle parking will be favourably considered.

Policy AC-D3 sets out minimum requirements for parking spaces and states that for a 1 or 2 bedroom houses, 2 car parking spaces are required and that development in more sustainable locations that are well served by public transport or have good walking and cycling links will be considered appropriate for lower levels of car parking provision.

The proposed development would provide 7 2 bed dwellings and 2 1 bed dwellings. Policy AC-D3 therefore requires a minimum of 18 spaces. The proposed site plan shows 9 car parking spaces, one of which is disabled, 3 motorcycle parking spaces and 8 cycle storage spaces.

The proposed scheme falls short of the parking space standards outlined in Table 9.1. However, the proposed development lies within a more sustainable location and has regular public transport links to larger settlements such as Tiverton and Minehead, where lower levels of car parking provision can be considered.

In addition, the existing commercial use of the property, using the standards set out in Table 9.1, would fall short of the total number of car spaces and cycle spaces in relation to the size of the commercial space provided. The existing site should have provided 13 car spaces and 5 cycle spaces in accordance with Table 9.1.

Somerset Council Highways Authority have commented on the application and have no objection subject to conditions relating the provision of parking, turning and cycle parking prior to occupation/utilisation.

The Highways Authority note that, ‘Whilst it is recognised that the access road is narrow in width, there is the existing use for vehicles at this site, accident data shows there have been no incidents recorded in the last 5 years. Vehicular speeds are likely to be low in this location and that whilst there are a lower number of vehicle parking spaces proposed, the application is located in a highly sustainable area within Dulverton, with access to shops, amenities and public transport facilities.’

The Highways Authority also suggest the inclusion of an informative in relation to potential encroachment on the highway.

The proposal is not considered to result in severe harm to the safe, convenient and efficient movement of highway users.

As noted above the proposed scheme falls short of the parking space standards outlined in Table 9.1. However, the proposed development lies within a more sustainable location and has regular public transport links to larger settlements such as Tiverton and Minehead, where lower levels of car parking provision can be considered. The existing site does not provide the number of spaces that the parking standards require but continued to operate until its closure in 2018. In having regard to this, the proposal would not therefore prejudice road safety interests and would accord with Policies AC-S1, AC-S2, AC-D2 and AC-D3 of the Local Plan.

RESIDENTIAL NEIGHBOURS LIVING CONDITIONS

Policy GP1 of the Local Plan states that opportunities must be taken to contribute to the sustainable development of the area and particular attention will be paid to the impact on the amenities of local residents or occupiers of neighbouring properties. Policy CE-S6 states that development should not detrimentally affect the amenities of surrounding properties and occupiers including overlooking, loss of daylight, overbearing appearance, or other adverse environmental impacts.

Policy P3 of the NPPF relates to living condition and pollution and Paragraph 1 states that development proposals should be appropriate for their location, taking into account the likely effects (including cumulative effects) of pollution on health; living conditions and the natural environment. Paragraph 2 states that development proposals should provide healthy living conditions for occupiers and users in terms of adequate access to light, avoiding exposure to levels of air, noise, artificial light, water, soil or other forms of pollution on or beyond the site.

There are residential properties to the north, east and south of the application site.

The external changes to the former Laundry include the replacement of all windows, the creation of new openings, the removal of flues, additional storeys on the workshop and the boiler house to create additional first floor accommodation and replacement of roof materials with natural slate.

Thirteen public letters of representation have been received; one in support, four objecting and eight others. The comments are noted earlier in this report.

The closest residential neighbours to the site are to the north, 6 Chapel Street (The Old Bakehouse), 9 Chapel Street (Millstream Cottage); to the east, 22 Chapel Street (Hampshire House); and, to the immediate south, 10 Chapel Street (Lower Mill).

The owner of Lower Mill, the property to the immediate south of, and which shares a boundary with, the application site has initially raised particular objections in relation to overlooking from first-floor windows, increased activity, privacy impacts to their gardens, and potential disturbance from future residents, visitors, deliveries, bins, maintenance and right of access.

The proposed scheme has been amended in response to the concerns raised. The first-floor balcony on Boiler House 2 has been omitted, and the four full length French doors have been amended to one four-pane window. The car parking arrangements have been amended to ensure that the right of access to Lower Mill is not obstructed. Further amendments to the window at first floor on the south west elevation of Boiler House 2 have also been proposed and include a reduction in its size and a slightly higher position.

Further to these amendments, the owner of Lower Mill has advised that they are satisfied that their concerns regarding overlooking and loss of privacy have been addressed. However, they maintain concern that the existing sewage infrastructure does not have the capacity to accommodate the proposed development. This is a matter considered under other matters later in this report.

The main form of the building would not be altered in a way that would cause a material impact on daylight or overshadowing of neighbouring properties.

The proposed residential use is compatible with the existing residential use of the area. The former Laundry building is orientated at an oblique angle to the properties to the north/north east.

The introduction of residential accommodation would be likely to increase day-to-day activity at the site when compared with its current condition, including movements by future occupiers, visitors, delivery vehicles and refuse collection arrangements. However, given the existing nature and character of local development, and noting that the proposal is for residential development, this would not cause a harmful impact.

Construction impacts, including vehicle movements, deliveries, contractor parking, site storage and hours of working, have been raised, and are also likely to be sensitive given the restricted nature of the site and access route. Although temporary, such impacts could be significant if not properly managed. A detailed and enforceable Construction Traffic Management Plan and Construction Environmental Management Plan would therefore be necessary, should planning permission be granted.

Refuse Storage
The submitted proposed plans show the stationing of a bin store for the apartments within the workshop and the mill building itself to the north western side of the site. The bin store sits to the western side of The Old Bakehouse and immediately adjacent to a boundary wall.

The bin store will measure approximately 7.3 metres by 0.75 metres and approximately 1.1 metres high. The bin store is constructed of hit and miss timber

cladding and encloses the bins within the 7 designated bays with access doors on the western elevation.

Given the nature of the proposed scheme, it is not considered that the bin storage measures would cause harm to nearby residential properties.

Overall, concerns have been raised by neighbouring occupiers having regard to the constrained nature of the site and its close relationship with surrounding properties and businesses. The proposal may be capable of being made acceptable through robust conditions relating to refuse and servicing arrangements, parking and construction management.

Given the above, it is considered that, through the imposition of appropriate conditions, particularly in relation to refuse collection, and impacts during construction due the constrained nature of the site and surrounding residential properties, there would not be an unacceptable increase in overlooking or loss of privacy, the development would cause no adverse effect on the neighbouring occupiers or from overbearing, noise, loss of light or other adverse environmental impacts. Therefore, the proposed development would have an acceptable impact on the living conditions of neighbouring residents, in accordance with Policies GP1 and CE-S6 of the Local Plan.

OTHER MATTERS

Foul Sewerage and Drainage
The application submission indicates that the former laundry use required generous water supply and drainage infrastructure. The existing infrastructure offers significant capacity including a specific sump pumping station from the mains supply in the existing car park west of the complex.

The proposed development will utilise this following the existing provision including that for foul drainage where the complex is connected to main sewerage in line with Policy CC-D5 Sewerage Capacity and Sewage Disposal of the Local Plan.

The design approach is to utilise this following the existing provision including that for foul drainage where the complex is connected to main sewerage. Recognising the increased demands arising from climate change, rainwater calculations suggest that current predictions (using the methodology set out in Building Regulations) is less than the existing situation through removal of the infill structures and improved permeability of exterior surfaces. As set out in the FRA, permeability of the exterior finishes improve capacity for run off by 33 %.

Refuse Collection
Individual bin stores are proposed for each unit. The bin stores for the six units in the Mill building and the workshop would be positioned together and in a single a row adjacent to a boundary wall. The bin store for the two boiler house units in located along the southern boundary. The vet's refuse is collected currently, and refuse was collected from the site when it operated as the laundry. The submitted documents indicate that the existing arrangements with the vet’s refuse would also

serve the proposed development. No formal confirmation that this would be the case has been submitted. If planning permission is granted a condition could be added seeking confirmation of how/where the refuse would be collected including confirmation from Somerset Council that the submitted approach was achievable.

Site Management Plan
The application submission sets out that a construction site management plan will be prepared prior to construction commencing as is normal practice under the BSA/CDM Regulations. Execution of the work is naturally contained within the complex where existing walls and boundaries reduce the risk of overspill or impact into the leat or neighbouring properties. A Construction Ecological Mitigation Plan and a Construction Traffic Management Plan can be secured by condition should planning permission be granted.

Human Right

The provisions of the Human Rights Act 1998 and Equality Act 2010 have been taken into account in reaching the recommendation contained in this report.

Planning Balance and Conclusion

The starting point for the determination of this application is the development plan. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF is an important material consideration and confirms that decisions should be plan-led, while Policy S4 provides that development within settlements should be approved unless its benefits would be substantially outweighed by adverse effects when assessed against the national decision-making policies.

There are significant benefits associated with the proposal. Most importantly, it would bring the Grade II listed former Dulverton Laundry, which has been unoccupied since 2018 and is included on the Authority's Buildings at Risk Register, back into active use. The building requires investment and its repair, occupation and ongoing maintenance would help secure its long-term future. This is material heritage benefit to which significant weight should be given.

The proposal would also make use of an existing building within Dulverton and provide nine additional Principal Residence dwellings in a Local Service Centre However, given that the dwellings would not meet an identified local affordable need for housing, this benefit is afforded limited weight.

The scheme incorporates a number of more limited benefits, including the retention and interpretation of elements associated with the former industrial use, photovoltaic generation, biodiversity mitigation and enhancement, and improvements to surface-water management. There would also be economic and social benefits associated with the residential development through its construction and subsequent occupation. Taken together these add positively to the proposal, although they

attract less weight than the principal benefit of securing the future of the listed building and are limited by virtue of the scale of development proposed.

Against those benefits, the proposal conflicts materially with the economic strategy of the Local Plan Policies. The conversion would permanently remove the former Laundry from potential employment use without the evidence presently demonstrating compliance with the marketing, viability and sequential requirements of Policy SE-D2. In particular, the required continuous 12-month marketing exercise has not been demonstrated, and the evidence does not establish that the sequential alternatives required by the Policy have been exhausted. The difficulty and cost associated with renewed employment use are relevant considerations, but the evidence submitted does not demonstrate compliance with the Policy's specific marketing and sequential requirements.

There is additionally material conflict with the Local Plan's exceptions-based housing strategy. The proposal would provide nine Principal Residence market dwellings but no local needs affordable housing. The independent viability evidence is an important consideration and supports the conclusion that the proposed development cannot support an affordable housing contribution. Nevertheless, viability does not of itself displace the separate requirements governing the circumstances in which Principal Residence market housing may be accepted. However, given the viability issues in providing affordable housing within the scheme and acknowledging that Policy DM5 of the NPPF says that there may be circumstances in which a viability assessment demonstrates that it would not be possible for development to proceed on a policy compliant basis, this conflict attracts moderate weight.

A separate and particularly important consideration is the effect on the designated heritage assets. The proposal would secure the continued use of the listed building, and that is an important public benefit. However, the proposed wholesale replacement of its characteristic multipane fenestration with triple-glazed aluminium composite units without glazing bars, together with aluminium spandrel panels, would materially alter an architectural feature which contributes directly to an understanding of the building's industrial origins and significance. Less harmful alternatives have been identified during consideration of the application but have not been incorporated into the submitted scheme. The resulting harm would affect both the special architectural and historic interest of the Grade II listed building and its positive contribution to the Dulverton Conservation Area.

That harm must be afforded considerable importance and weight. National Policy HE6 requires substantial weight to be given to the conservation of designated heritage assets and requires any harm to be weighed against the public benefits of the proposal. National policy expressly recognises that securing the long-term reuse of a vacant or underused listed building can constitute an important public benefit. The heritage balance in this case therefore carries significant considerations on both sides.

In undertaking that balance, significant weight is given to securing the repair and long-term reuse of the former Laundry. However, the public benefit lies principally in securing an appropriate sustainable use for the heritage asset rather than necessarily in implementing the particular fenestration treatment currently proposed. The evidence does not demonstrate that the identified harm to its significant fenestration is an unavoidable consequence of bringing the building back into use. Alternative, less harmful treatments have been identified, and the evidence does not satisfactorily demonstrate that they are incapable of being delivered. The public benefits of the scheme therefore do not outweigh the identified and avoidable harm to the significance of the listed building and Dulverton Conservation Area.

Other considerations do not materially alter that balance. The Highway Authority raises no objection subject to conditions, ecological effects can be satisfactorily mitigated and statutory Biodiversity Net Gain delivered, and the revised Flood Risk Assessment has enabled the Environment Agency to withdraw its technical objection subject to appropriate flood resilience measures. These matters demonstrate that important technical constraints are capable of being addressed, but compliance or mitigation in these respects does not outweigh the identified development-plan and heritage conflicts.

Overall, considerable weight is afforded to the benefits of bringing a prominent unoccupied and at risk listed building back into long-term use. This is a substantial consideration in favour of the development. However, this must be weighed against material conflict with the Local Plan's employment and housing strategies and, importantly, harm to designated heritage assets arising from detailed elements of the conversion which have not been demonstrated to be necessary or unavoidable. Having regard to the development plan as a whole, the statutory duties relating to the historic environment and the relevant national decision-making policies, the identified benefits do not outweigh those adverse effects and policy conflicts. The proposal therefore does not accord with the development plan when read as a whole, and the material considerations identified do not indicate that a decision should be taken otherwise.

It is therefore recommended that planning permission be REFUSED for the reasons set out below.

Recommendation

Refused

1. The proposed wholesale replacement of the building’s characteristic multipane fenestration with 48mm triple-glazed aluminium composite units without glazing bars, together with the introduction of aluminium spandrel panels, would remove surviving historic fabric and materially alter the form, detailing, proportions and material character of the principal elevations of the Grade II listed former Dulverton Laundry. The proposed treatment would give the building a more domestic appearance, erode the architectural relationship between its extensive fenestration and former industrial function, and diminish

its special architectural and historic interest. It would also weaken the positive contribution that this prominent industrial building makes to the character and appearance of the Dulverton Conservation Area. Less harmful alternatives, including the repair or replication of the existing fenestration and appropriately detailed timber or other heritage-compatible window systems, have not been satisfactorily incorporated or demonstrated to be unfeasible. The identified harm has therefore not been clearly and convincingly justified and would not be outweighed by the public benefits of securing the building's reuse, repair and long-term maintenance. The proposal is contrary to Policies GP1, CE-S4, CE-D3, CE-S5 and CE-S6 of the Exmoor National Park Local Plan 2011–2031 and Policies HE4, HE6 and HE9 of the National Planning Policy Framework 2026.

2. The proposal would provide nine Principal Residence market dwellings without delivering any local needs affordable housing. The proposal would therefore not fulfil the purpose for which market housing may exceptionally be permitted under the development plan's housing strategy. Although an independently reviewed viability assessment concludes that the development cannot support affordable housing provision, that evidence does not demonstrate compliance with the separate policy requirements governing the principle and form of residential development, including the applicable vacancy, marketing and sequential tests. The proposal would consequently provide market housing without meeting the identified affordable housing needs of the local community or satisfying the exceptional circumstances established by the development plan, contrary to Policies GP1, HC-S1, HC-S4 and HC-D2 of the Exmoor National Park Local Plan 2011–2031.

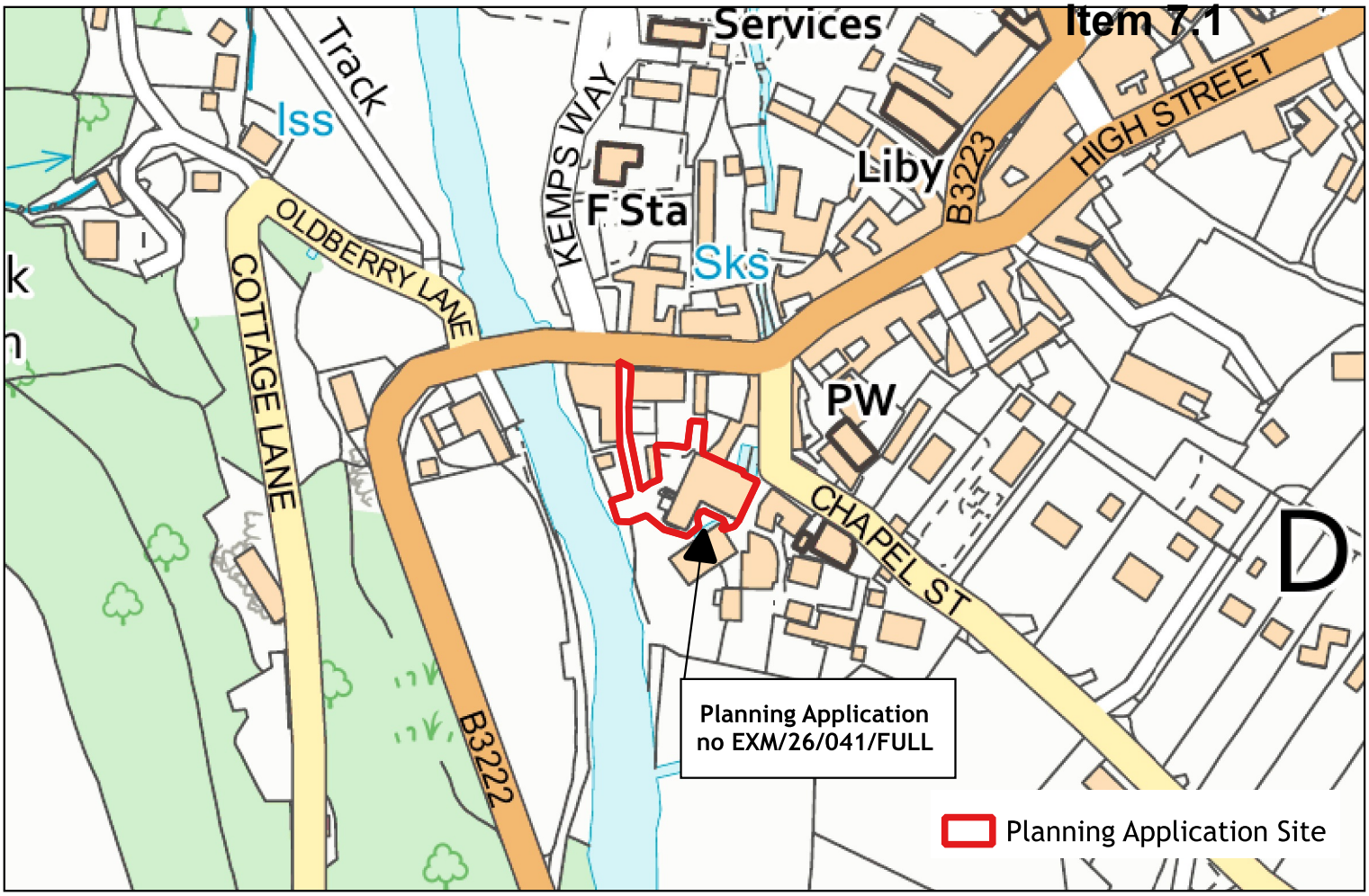
   Nor has it been demonstrated that the proposal qualifies for the separate exceptional route for Principal Residence market housing provided by Policy HC-D1, because the evidence does not demonstrate the required minimum three-year marketing period

3. The proposed change of use would result in the permanent loss of the former Dulverton Laundry as employment premises. The submitted evidence does not demonstrate that continued or alternative employment-generating use of the building is unviable over the longer term. In particular, the application is not supported by evidence of active and continuous marketing for employment uses for the minimum 12-month period required by the development plan, or evidence demonstrating that all realistic opportunities for grant funding, financial assistance, diversification, alternative employment uses and the retention or replacement of employment-generating floorspace have been fully investigated and found not to be feasible or viable. The proposal has therefore not demonstrated that residential use represents an acceptable final stage in the sequential approach to the loss of employment premises. The development would consequently result in the unjustified loss of an employment building within the Local Service Centre of Dulverton, contrary to Policies GP1 and SE-D2 of the Exmoor National Park Local Plan 2011–2031 and Policy S4 of the National Planning Policy Framework 2026.

Informatives

1. POSITIVE & PROACTIVE STATEMENT

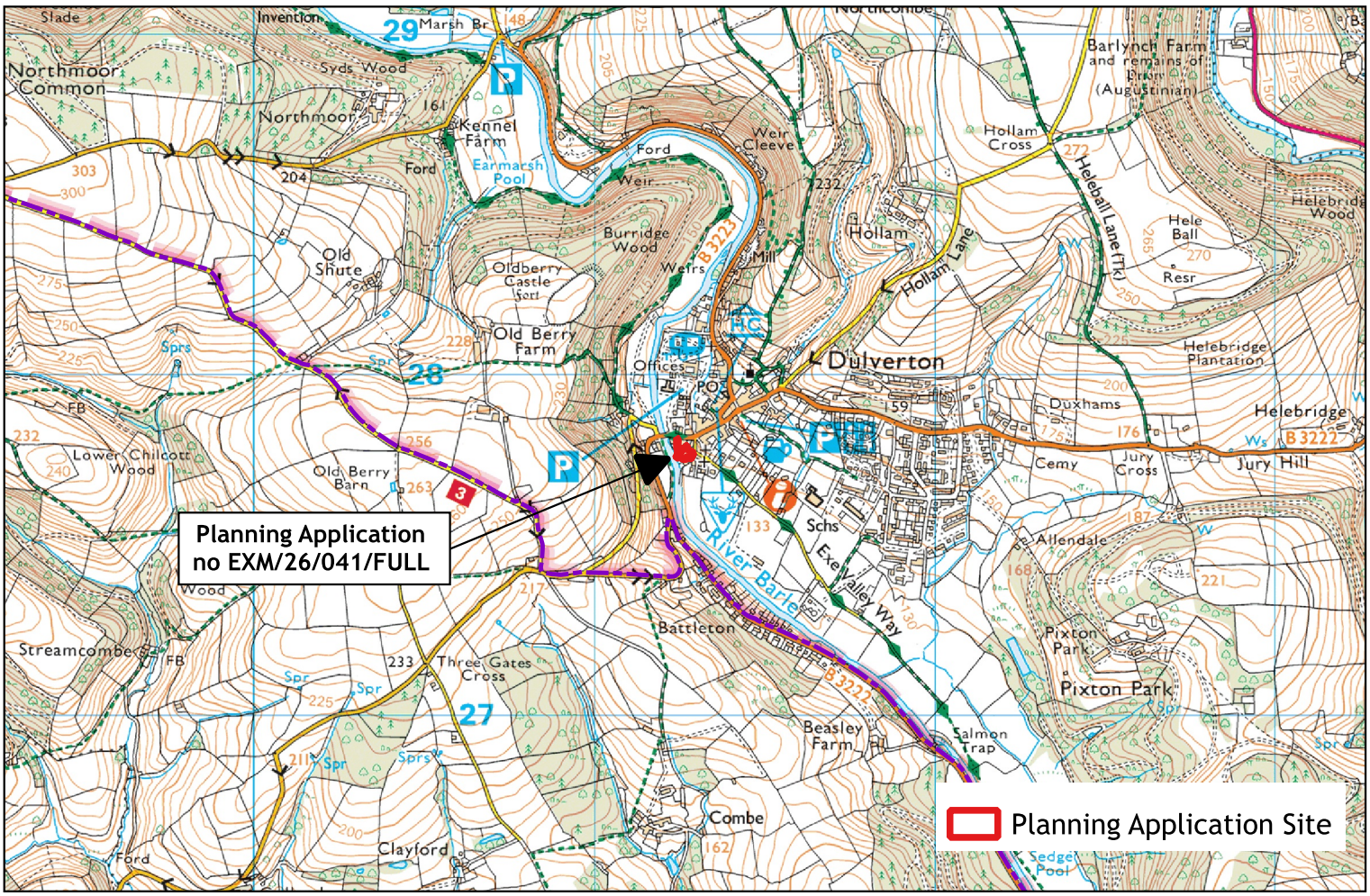
   This Authority has a pro-active approach to the delivery of development. Early pre-application engagement is always encouraged. In accordance with the requirements of Article 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015, in determining this application, Exmoor National Park Authority has endeavoured to work positively and proactively with the agent/applicant, in line with the National Planning Policy Framework, to ensure that all relevant planning considerations have been appropriately addressed to achieve a positive outcome. However, in this instance the relevant planning considerations have not been addressed and the application has therefore been refused.



Site Map

Scale

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Overview Map

Scale 1:20,000

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EXMOOR NATIONAL PARK

Committee Report

Application Number:	EXM/26/042/LBC
Valid Date:	6 February 2026
Target Determination Date:	4 December 2026
Extension of Time:	4 December 2026
Applicant:	Mrs Louise Bengtson
Agent:	Mrs L Crossman
Case Officer:	Yvonne Dale
Site Address:	The Laundry 8 Chapel Street Dulverton TA22 9HF
Proposal:	Listed building consent for the proposed conversion of the Grade ll listed Former Dulverton laundry building into residential accommodation consisting of 6no. 2-bed apartments in the main mill building; 2no. 1-bed Cottages in the former boiler house and 1no. 2-bed Cottage in the former workshop.
Recommendation:	Refused
Reason for bringing before Planning Committee:	The Officer's recommendation is contrary to that of Dulverton Town Council who support the application. In line with the Authority's Scheme of Delegation the application is brought before the Planning Committee for determination.
Pre-commencement conditions agreed:	N/A

Relevant History

6/9/11/140LB
Decision: Approved
Decision Date: 19/01/2012
Listed Building Consent for proposed improvements and repairs (retrospective).

6/9/87/120
Decision: Approved
Decision Date: 06/10/1987
Proposed extension to laundry at Dulverton Laundry, Dulverton as described in the plans and drawings submitted, as amended by revised plans received 18 August 1987

6/9/87/124LB
Decision: Approved
Decision Date: 06/10/1987
Proposed extensions to laundry at Dulverton Laundry, Dulverton as described in the plans and drawings submitted

7414
Decision: Approved
Decision Date: 16/02/1950
Proposed erection of boiler house

Site Description & Proposal

The application site is the former Dulverton Laundry, a three-storey building constructed of natural stone, wooden panels between timber windows and a hipped slate roof of low pitch. The site lies within the Dulverton Conservation Area, and the former laundry is a Grade II listed building (1247917). It is also recorded on Exmoor's Historic Environment Record (MSO10842), which states that: 'Dulverton Laundry was a crepe factory. It dates to the late 18th/early 19th century and was partly refenestrated in the mid to late 20th Century'.

The site can be accessed from the north east via Chapel Street and from the south west via an access track off Bridge Street known as Duckpaddle.

Listed Building Consent and planning permission is sought for the conversion of the former laundry building to provide nine residential units, comprising six 2-bed apartments within the main mill building, two 1-bed cottages within the former boiler house, and one 2-bed cottage within the former workshop.

The planning application, which is referenced EXM/26/041/FULL, is subject of a separate report.

The site occupies a constrained position close to Dulverton town centre, with residential and commercial properties in close proximity to the site and its access routes. The River Barle and mill leat lie immediately to the west/through the site and are relevant to its historic setting and flood-risk context. The relationship of the building to Chapel Street, Bridge Street and views into the Conservation Area from the west are also important to the assessment of the proposal.

Consultee Representations

Initial Consultation 13/2:
Historic England – 05/3/26:

Historic England Advice

The Significance of The Laundry

Dulverton Laundry is a good example of an early industrial building within the Dulverton Conservation Area which has evolved through several different uses. It has been listed at Grade II due to its special architectural and historical interest.

It originated as a likely early 19th century silk and crepe mill. By the later 19th century, the crepe mill had ceased trading and the building briefly became a

joinery workshop, before then functioning as a laundry for over 100 years until its closure in 2018.

The main range is imposing, of three storeys in local rubble stone. It is heavily fenestrated reflecting a necessity for natural light in the silk and crepe-making processes. This interrelationship between the construction and the function of the building contribute greatly to its architectural interest and significance.

Smaller ancillary structures surround the main block, including a parallel range to the north which appears contemporary to the main block, the perpendicular boiler house and a later 20th century boiler house. While no original machinery remains in the building, the removal of the waterwheel and the building of boiler houses is reflective of the evolution in technology in industrial processes.

The building is within the Dulverton Conservation Area. The Conservation Area is well-preserved, with a good stock of late 18th and early 19th century buildings which make use of vernacular building materials, particularly local stone. As there are only a few instances of buildings higher than two storeys, the Laundry is a notably large building within the Conservation Area. It makes a positive contribution to its character, particularly in views down Chapel Street and into the Conservation Area from the west as one enters the town.

Impact of Proposals

We welcome the intention to find a new use for a substantial Grade II listed building within the Dulverton Conservation Area. Residential use can be an effective and appropriate re-use of redundant industrial buildings, and we believe that this site has the capacity to be converted to residential use. However, we have concerns regarding some elements of these proposals.

The scale, massing, and materiality of the newly built elements of the scheme are inappropriate in the context of the Dulverton Conservation Area. The massing of the altered south west boiler building competes with the main building in a way that the existing subservient building does not, with the altered orientation of the roof changing their relationship. The height of the vertically extended north range will block much of the view of the north elevation of the mill as one approaches via Chapel Street, a view which currently makes a positive contribution to the Conservation Area.

Of greater concern is the materiality of the altered boiler buildings. While the intent for the metal cladding to create an industrial character is recognised, this will result in a building which is massively out of place in a well-preserved Conservation Area. In this part of the conservation area, natural stone (often rendered) is predominant.

We recognise that the building being replaced is of later blockwork, so there is a higher capacity for change with regards to impact on the listed building. However, the metal cladding proposed is visually incongruous with the character of the Conservation Area. This is particularly harmful when views in towards the Conservation Area across the river from the west are considered. The massing of

the building furthers the impact of the cladding. The harm this would cause to the Conservation Area, and to the listed building, is recognised in the Heritage Statement. This, however, has not been justified.

The scheme also proposes the demolition of the 20th century boiler house and multiple structures which surround the boiler houses and mill. The original functions and heritage value of these structures has not been clearly articulated. While these buildings are likely of lower significance than the main mill range, an understanding of their age and use should be demonstrated. This will enable your Authority to assess any harm caused by their removal, and whether any further justification is required.

We also observe that all windows are proposed for removal. Several of the windows (those multi-pane windows to the second floor) appear to have some heritage value. Their total replacement with the proposed modern windows causes harm not only to the listed building, but also to the positive contribution the building makes to the character of the Conservation Area. Options for retention have not been adequately explored, and therefore this harm has not been clearly and convincingly justified.

Policy

Great weight should be given to the conservation of heritage assets in decision making, and the more important the asset is – the greater this weight should be (National Planning Policy Framework (NPPF), Paragraph 212). The Laundry is Grade II listed and Dulverton Conservation Area is a designated heritage asset, therefore all efforts should be taken to conserve their significance.

Any harm to the significance of a designated heritage asset requires clear and convincing justification (NPPF, Paragraph 213). Several elements of the proposal have the potential to cause harm, which has not been justified. The re-use of a redundant building is not blanket justification for all harm caused, especially where less harmful design options have not been demonstrably explored.

Proposals leading to less than substantial harm to the significance of a designated heritage asset should be weighed against the public benefits of the proposal (NPPF, Paragraph 215). It is for your authority to weigh the public benefits of this proposal against the less than substantial harm that it will cause to The Laundry and to the Dulverton Conservation Area.

Historic England’s Position

Historic England support the re-use of a redundant listed building within the Conservation Area, and we believe that the site has the capacity to deliver a residential scheme.

However, we also believe that the current designs will amount to less than substantial harm to the special character of Dulverton Conservation Area, and to the Grade II listed Laundry.

Primarily, we have concerns regarding the following;

- The extensive use of metal cladding to the exterior of the south west range is a jarring material choice within the context of the Conservation Area, especially as this site can be seen when entering Dulverton from the west
- The scale and massing of the north range and the south west range detract from views of the listed building which contribute positively to the Conservation Area.
- While we are not opposed in principle to the loss of structures of lower significance, the age, use, and heritage value of the structures to be lost has not been adequately explained.
- The removal of early windows has not been adequately justified, and will have a harmful impact on the building's contribution to the character of the Conservation Area.

Before the harm caused by these proposals is balanced against any public benefit of the scheme, this should be mitigated through the exploration of less visually harmful designs. Additional information should also be provided regarding the significance of the structures to be demolished. The harm can otherwise not be considered justified.

Recommendation

Historic England has concerns regarding the applications on heritage grounds. We recommend your Authority requests amended designs which are less harmful to the character of the Conservation Area. It is then for your Authority to balance the harm of the proposals against any public benefit the scheme offers.

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the applications to meet the requirements of paragraphs 212 and 213 of the NPPF.

In determining these applications you should bear in mind the statutory duty of sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they posses, and of section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Environment Agency – 03/03/2026

Environment Agency Position

We object to this application due to an inadequate Flood Risk Assessment. Our flood risk concerns relate to the safety of users of the development over its lifetime, in particular the proposals to use the ground floor for residential usage.

Reasons

The building and access road/proposed car park area are located within flood zone 3 ‘high probability’ associated with the River Barle and Hollam Brook, the risk of flooding posing a marked hazard to users of the development.

The modes of flooding at the site are complex and have not been adequately demonstrated within the applicants flood risk assessment (FRA) by WCI Group Ltd Issue 4 dated 17.10.25. We do not agree with the flood risk assessment in terms of the assertion that the ground floor would be ‘suitable’ for ‘residential accommodation’ given the potential depths that could occur and onset/modes of flooding, and given general uncertainty as to ‘design’ an ‘extreme’ with climate change water levels that could occur.

In terms of the potential for damage to occur to both the fabric and contents of the proposal it should be noted that flood resistance measures require installation following a warning and may not always be fitted in time or preclude flood waters. Whilst the NPPF does not expressly require residential usage to be free from internal flooding, the requirement to ensure users would be safe is quite explicit. Depths of over 0.5 m are deemed unsafe. Flood resistance measures are generally deemed as being unsuitable when water levels of more than 600mm are predicted to occur.

Overcoming our objection

It is evident that alternative ‘less vulnerable’ usages would be more appropriate for the ground floors of the building in question.

The applicant may wish to commission the production of a detailed hydraulic model and for the flood risk assessment and submissions be revised accordingly. This should include any reasonably foreseeable residual risks associated with the flood risk management infrastructure present.

In the absence of a detailed hydraulic model the FRA should be revised to;

- demonstrate the mode of flooding associated with overtopping of the flood alleviation scheme, from the leat inlcuding failure of its associated

flow control sluice, and blockage of the Hollam Brook flood alleviation scheme flow diversion structure

- demonstrate how the levels of flood waters, as shown on photos within the flood risk assessment of the Dec 2012, and 1952, relate to site levels and floor levels.
- show the area of the site and its environs likely affected in the Dec 2012, and 1952,
- show the suggested design flood level of '135.362mA.O.D' on the proposal elevation and section drawings
- the time of onset of flooding from all sources and hazard users would be subjected to in times of flood.

The above is not exhaustive.

Your authorities emergency planner should be consulted with regard to the safety implications to users and their position and reasoning made transparent given safety is a material consideration. It is for the councils emergency planner to determine whether refuge and evacuation proposals are safe and acceptable.

Informatives

We take this opportunity to highlight the below,

- the Environment Agency do not own any assets at the site
- riparian rights and responsibilities will apply with regard to the leat. Such isimportant to recognise given the leat poses a pathway for flood waters.
- the Environment Agency hold discretionary powers to operate the sluice structures at the inlet to the leat and powers to rebuild/replace them but not a legal obligation to do so.
- we advise the developer establishes ownership and maintenance responsibilities associated with the leat and how such would be transferred, including any structures they will retain ownership of.

Note to applicant
Should you wish us to review any technical documents or want further advice to overcome our objection prior to formally submitting information to the LPA, we may do this as part of our charged for planning advice service.

Further engagement will provide you with the opportunity to discuss and gain our views on potential options to overcome our objection with us, before formally submitting further information as part of your planning application.

As part of our charged for service we will provide a dedicated project manager to act as a single point of contact to help resolve any problems. We currently charge £100 per hour, plus VAT. We will provide you with an estimated cost for any further discussions or review of documents. The standard terms of our charged for service are available.

Somerset Council – Rural Housing Enabler – 19/02/2026

The applicant seeks permission to create nine separate dwellings through the conversion of both the main building, the former boiler house and the former workshop. Listed building consent is required due to the Grade II status and consequently the detail in the application is largely focussed on these matters, but this formal response does not attempt to address these and instead is focussed on the intended outcome in terms of tenure type.

The Exmoor Local Plan policy HC-D2 allows for conversions to dwellings where "there is a proven local need for the dwelling(s) which will meet an affordable local need, and the intended occupants meet the requirements of the local need occupancy criteria in perpetuity in accordance with HC-S3;

"and … the dwelling(s) will be affordable by size and type to local people and will remain so in perpetuity in accordance with HC-S2"
It further stipulates that market (principal residence) dwellings can be permitted in limited circumstances, where

"it is clearly and robustly demonstrated that an element of Principal Residence market housing (HC-S4) is required to enable delivery of local need affordable housing (HC-S3) which cannot be made financially viable without it"
and

"it is the minimum number of Principal Residence market dwellings required to support the delivery of the required affordable housing and will maximise the proportion of affordable homes within viability constraints"

In other words, the primary purpose of allowing such a conversion is to produce the locally required affordable housing with any market housing (restricted to principal residence) permitted only to the minimum number needed to produce any cross subsidy required to make the affordable element financially viable.

However, the applicant has presented the case for solely creating market dwellings and has cited viability issues preventing the inclusion of any affordable dwellings. The viability case is made in Appendix 4 of the Design and Access Statement which is not available in public domain due to commercial confidentiality. Clearly the planning authority will wish to verify that the data provided on viability is both accurate and robust before considering the implications.

However, my observation is that the applicant cannot argue that only a purely market housing scheme is viable because policy HC-D2 is framed around allowing market housing only in order to ensure the provision of (some) affordable housing. In my opinion if no affordable housing is being offered, there is no justification for any market housing being permitted under HC-D2, regardless of the economics. If the applicant is able to overcome the viability issues, for example by working in partnership with a Registered Provider, such as a Housing Association, who may then be able to access subsidy in the form of a capital grant from Homes England

in order to provide an element of affordable housing, then the following comments would apply.

As at 6th January 2026 there were 78 households registered on Homefinder Somerset citing a local connection to the parish of Dulverton, of whom 45 required a 1-bedroom dwelling and 20 required 2 bedrooms. This supports the provision of the proposed nine dwellings in terms of affordable housing for rent alone.

In the event that permission is granted, there should be a s106 Agreement enforcing perpetuity of any affordable housing and setting out the criteria for proposed occupants, both in terms of their inability to access suitable market solutions and their valid local connection to the Parish of Dulverton or adjacent parishes in accordance with current Local Plan policy HC-S3.

There are no other material observations.

Dulverton Town Council – 26/02/2026

The Council supports the proposal in principle with the following reservations:

Car Parking
There is only one car parking space allocated to each residence proposed on the basis that a reduced number of spaces can be justified as the location is close to the town centre and there is access to a regular bus service. The Council strongly disputes that there is an adequate bus service serving Dulverton.

Affordable Housing

Although the application states that Local Needs Affordable Housing is not viable the Council requests that Principle Residence Housing should be stipulated if the application is passed.

Rubbish Collection

The rubbish collection point is unclear on the application. The Council wishes to object to adding any more bins being placed for collection at the Chapel Street Collection Point due to the narrowness of the road. The existing large wheelie bin is for the use of No 1, 3 5 and 7 Chapel Street only.

Right of Access

Council notes that there are other residents who have a right of access along the entrance road to the development.

Proposed Materials

Council expressed concerns that the proposed replacement windows will be of aluminium. Council expressed concern that all proposed materials to be used should be in keeping with the Listed Building and should retain the historical integrity of the building.

Construction Traffic

Council expressed concern regarding the management of the building works that will need to be undertaken. Council requests that if permission is granted that consideration is given to the health and wellbeing of local residents and that a comprehensive traffic management plan be drawn up and adopted prior to the commencement of construction to ensure that time restrictions are in place regarding the transportation of materials and that potential congestion is avoided to mitigate any disturbances and protect the vitality and viability of nearby local businesses.

Re-Consultation 10/6:
Historic England – 16/06/26

Summary
The Laundry is an imposing Grade II building which makes a positive contribution to the character of Dulverton Conservation Area. We previously expressed concern with the proposed massing, materiality and fenestration due to the harm caused to the character of the Conservation Area. While some of this has been mitigated, we do maintain some concerns with the scheme.

Historic England Advice
Proposals
The proposal aims to convert a disused former mill and later laundry building into residential accommodation. These amendments represent a small change to the openings of one range, and the change from proposed zinc cladding to timber cladding on the same range.

Significance of The Laundry

Dulverton Laundry is a good example of an early industrial building within the Dulverton Conservation Area which has evolved through several different uses. It has been listed at Grade II due to its special architectural and historical interest. It originated as a likely early 19th century silk and crepe mill. By the later 19th century, the crepe mill had ceased trading and the building briefly became a joinery workshop, before then functioning as a laundry for over 100 years until its closure in 2018.

The main range is imposing, of three storeys in local rubble stone. It is heavily fenestrated reflecting a necessity for natural light in the silk and crepe-making processes. This interrelationship between the construction and the function of the building contribute greatly to its architectural interest and significance.

Smaller ancillary structures surround the main block, including a parallel range to the north which appears contemporary to the main block, the perpendicular boiler house and a later 20th century boiler house. While no original machinery remains in the building, the removal of the waterwheel and the building of boiler houses is reflective of the evolution in technology in industrial processes.

The building is within the Dulverton Conservation Area. The Conservation Area is well-preserved, with a good stock of late 18th and early 19th century buildings which make use of vernacular building materials, particularly local stone. As there are only a few instances of buildings higher than two storeys, the Laundry is a notably large building within the Conservation Area. It makes a positive contribution to its character, particularly in views down Chapel Street and into the Conservation Area from the west as one enters the town.

Impact of Proposals

In our previous letter of 5th March 2026, we welcomed the principle of residential conversion for the Laundry but had some concerns regarding the materiality and massing of the buildings.

The change from zinc to timber cladding is positive, and while timber cladding itself is not common in the Dulverton Conservation Area, this is a natural material that is far less visually jarring with the modest character of the town. This is clearly delineated as a new phase of development.

The massing of the proposals has not changed, therefore the positive view to the mill as one approaches Chapel Street will still be eroded, harming the character of the Conservation Area.

Furthermore, the replacement of the windows with modern aluminium windows is still proposed. The removal of characterful windows and extensive use of aluminium windows across the elevations of this building will be of detriment to the character of the Conservation Area.

Position

Great weight should be given to the conservation of heritage assets in decision making (National Planning Policy Framework (NPPF), Paragraph 212). The Laundry is Grade II listed and Dulverton Conservation Area is a designated heritage asset, therefore all efforts should be taken to conserve their significance. With this in mind, our concerns regarding the use of metal cladding have been mitigated. The change to timber will better conserve the character of the Conservation Area.

However, we maintain our concerns regarding the massing of the building and the fenestration scheme. We recognise that there are building regulation implications that have steered the choice of the windows, however there is a clear degree of harm caused by this proposal. Timber windows would of course be preferable, but if aluminium is necessary, we would recommend for the window character to be less overtly domestic than that which is proposed.

Your Authority must weigh the harm that the proposed scheme will cause to The Laundry and to the character of the Dulverton Conservation Area against the public benefit which the scheme offers (NPPF, Paragraph 215).

Recommendation

Historic England recommends that in determining this application your Council should weigh the harm which the proposed development would cause to the significance oF the Laundry and Dulverton Conservation Area against such public benefits as the development may procure. In doing so, it should give great weight to the conservation of these designated heritage assets.

If there are any material changes to the proposals beyond those we have suggested, please contact us. If you propose to determine the application in its current form, please inform us of the date of the committee and send us a copy of your report at the earliest opportunity. Please also advise us of the decision in due course.

ENPA Senior Heritage Officer – 08/07/2026

I note in my response the comments made in objection by both Historic England and The Georgian Group. Their concerns are largely in line with my earlier comments dated March 6th which should also be referred to. It is important to state from the start that neither of these bodies, nor myself, are objecting to the proposed change of use of the building, and that our objections relate to design elements in the application. The listed status of the building is not a barrier to the proposed change of use.

While some welcome revisions have been made to the scheme, such as the timber cladding to the boiler house extension (although this is only shown on the south west elevation at present), I am still unable to support the application as it currently stands, The major remaining stumbling block for the application(s) is the window design and the wider treatment of the external fenestration. It is still proposed to use 48mm triple glazed composite windows with no glazing bars. These are very different in design and appearance to the existing timber multipaned single glazed windows and will give the fenestration of the building a much more domestic appearance. To permit such a change of window design on a listed building in a conservation area would set a national precedent and be contrary to local and national planning policy. Therefore, I cannot support the scheme as it stands. Historic England and The Georgian Group have both come to the same view on this with the Georgian Group being of the view the proposals cause a substantial level of harm.

The justification provided for the use of the triple glazed, aluminium composite windows is primarily cost and to ensure the building complies with modern energy efficiency standards. While the costs provided for the windows is helpful I can only give this limited weight. As the Georgian Group state, a private financial benefit does not constitute a public benefit in the NPPF. The NPPF gives great weight to the heritage assets conservation irrespective of the level of harm. Part L of building regulations which relates to the conservation of fuel and power provides an exemption for the requirement of listed buildings to fully comply with energy efficiency requirements where the works would unacceptably alter the character or appearance of that building. The document requires the building control body to take into account the views of the local authorities conservation officer.

There are numerous highly listed mill buildings throughout the country which have been successfully converted while maintaining their original windows or with new windows being fitted which replicate the small pane glazing which is characteristic of such buildings.

I also object to the use of aluminium panels between the windows and would ask that timber is used instead. The material will look out of place on the listed building and will have a harmful impact on the conservation area.

I note the comments made by the Georgian Society regarding the solar panels. In my previous comment I supported the solar panels as I of the view that the visual impact will be slight. I maintain this view but agree that further detail on the impact on the roof structure and a energy strategy would be helpful.

Somerset Council – Rural Housing Enabler – 16/06/2026

I have received an alert stating amendments to these applications (both Full & Listed Building Consent) for repurposing the former laundry in Dulverton. Looking at the planning portal, it seems that these amends follow further discussion on site and consider details such as window types, use of aluminium flashings and rights of access. I have no comment on these matters.

However, the email from the agent appears to dismiss the points raised in my original formal response with respect to the requirement to provide affordable housing. Nothing in the amendments posted on the portal alters my substantive point, viz "… the applicant cannot argue that only a purely market housing scheme is viable because policy HC-D2 is framed around allowing market housing only in order to ensure the provision of (some) affordable housing. In my opinion if no affordable housing is being offered, there is no justification for any market housing being permitted under HC-D2, regardless of the economics."

Dulverton Town Council – 23/06/2026
Members of the Planning Committee support this Planning Application

Re-Consultation 15/7:
Historic England 20/07/2026
Thank you for your letter of 2026-07-15 regarding further information on the above application for listed building consent.

We have already provided advice on this application in our letter of 24th June 2026 That advice stands, and we have no additional comment to make in response to this further information.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals.

Representations

Total – Objections	Total – Support	Total – No Objections
1	1	12

Summary of comments:

The matters raised in support of the application include:

- Reuse of an existing/redundant building
- The proposal is supported as a positive reuse of a building currently seen as underused or detrimental to the townscape.
- Heritage and conservation benefit
- Comments emphasise that the scheme would preserve a historic structure and retain existing fabric, presenting it as a conservation-led development.
- Provision of housing
- The proposal is seen as delivering valuable housing, even though affordable housing is not provided.
- Design quality and efficient use of space
- The design is described as sensible, making effective use of the existing building volume while minimising harm or compromise to the original structure.
- Viability of conservation projects
- There is recognition that the costs and viability challenges associated with conserving historic buildings may limit the ability to provide affordable housing.
- Balanced support despite highway constraints
- Although parking and access concerns are acknowledged, the comments suggest these issues are not unusual for Dulverton and should not, in the respondent's view, justify refusal.

The matters raised in objection of the application include:

- Access constraints and highway safety
- A central concern is the narrow alleyway, tight access, vehicle turning, obstruction, and whether the site can safely accommodate construction traffic, residents, visitors, deliveries and emergency vehicles.
- Parking inadequacy and reliance on public car parks
- Several comments challenge the proposed parking provision, including whether spaces are usable, whether existing rights of access may be obstructed, and whether public car parks can legitimately be relied upon.
- Construction impacts and deliverability
- There are concerns that the applicant has not shown how construction would be managed, how long works would last, or how disruption, safety risks and effects on neighbours/businesses would be controlled.

- Emergency access and fire safety
- Respondents ask for evidence that emergency vehicles can reach, operate at and leave the site safely, both during construction and once occupied.
- Character, heritage and conservation harm
- The comments argue that modern interventions, increased residential activity and acknowledged harm to the listed building/conservation area need to be properly assessed and weighed.
- Drainage and sewerage capacity
- Objections raise uncertainty about the existing sewer pipework, its age, condition, route, ownership and capacity to serve additional residential use.
- Challenge to transport assumptions
- Respondents dispute the claim that residential use would generate less traffic than the former laundry, arguing that there is insufficient evidence to support that comparison.
- Financial viability concerns
- Several comments question the weight being given to viability, arguing that financial viability is not itself a planning justification and should have been assessed earlier by the developer.

Other matters raised include:

- Traffic, access and highway safety
- Concern about constrained access via Chapel Street, Bridge Street, the alleyway, the vet's car park, the garage area and "Duckpaddle" and whether these routes can safely accommodate construction traffic, deliveries, residents' vehicles and day-to-day servicing.
- Construction impacts on residents and businesses
- Several comments stress that construction would affect nearby homes and businesses, with calls for a Construction Traffic Management Plan to control disruption, safety risks, deliveries, vehicle movements and working arrangements.
- Parking inadequacy and pressure on town parking
- There is concern that the proposed parking is insufficient for the number of dwellings, especially given limited public transport, and that overspill parking would put further pressure on existing town car parks and streets.
- Ongoing operational access after completion
- Concerns are not limited to construction; respondents also question how future residents, visitors, deliveries, bin collections and maintenance vehicles would access the site without causing obstruction or disturbance.
- Heritage, character and materials
- Comments support the move to timber cladding as more in keeping with the area but also stress the need to preserve the character and

appearance of the listed/former laundry building through appropriate materials, cladding, windows and detailed conditions.

- Flood risk
- The Environment Agency's concern about the adequacy of the Flood Risk Assessment is noted, particularly in relation to risks to proposed ground-floor accommodation.
- Affordable housing and principal residence restriction
- Several comments challenge the absence of affordable housing and suggest that, if viability prevents affordable provision, the dwellings should at least be restricted to principal residence use rather than second homes or holiday lets.
- Electric vehicle charging and sustainability
- One specific issue raised is the apparent lack of electric vehicle charging provision within the proposed parking bays.
- Refuse/bin collection practicality
- There is concern that the proposed bin storage and collection arrangements appear impractical, particularly if bins are to be collected from Chapel Street while stored at the rear of the main building.
- Design scale and safety details
- Comments question whether the proposed workshop is taller than the existing structure and raise safety concerns about the open leat/French doors/metal balustrade arrangement.
- Legal/maintenance uncertainty over access routes
- Some comments raise uncertainty over ownership, surface wear, repair responsibilities and future maintenance of the alleyway/access route.
- Alternative layout or reduced scheme
- A respondent enquires as to whether reducing the scheme by one dwelling (the workshop) could allow improved access, more parking, dual access or a one-way arrangement.

Planning Context

Exmoor National Park Local Plan 2011-2031 (inclusive of minerals and waste policies):
The works proposed under the Listed Building application must be considered under the Planning (Listed Buildings and Conservation Areas) Act 1990. Under Section 16, the Local Planning Authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural interest which it possesses.

Exmoor National Park Local Plan 2011 – 2031 (including minerals and waste policies)
GP1 – General Policy
CE-S6 – Design and sustainable construction principles

CE-S4 – Cultural Heritage and Historic Environment
CE-D3 – Conserving Heritage Assets
CE-S3 – Biodiversity and green infrastructure
The National Planning Policy Framework (NPPF) is also a material planning consideration.

Planning Considerations

The main considerations in this case are considered to be the effect of the proposed works on the listed building, the desirability of preserving the listed building or its setting or any features of special architectural interest which it possesses and whether the proposed works cause a degree of impact that would be unacceptable. The potential effect on protected wildlife species is also a consideration.

The former Dulverton Laundry is a Grade II listed building. The listing description states:

(Formerly listed under Chapel Lane (West Side))

GV
II

Crepe factory, now laundry, Late C18-early C19, partly refenestrated mid-late C20. Random rubble local stone, wooden panels between windows, shallow pitched hipped slate roof. Plan: rectangular block originally identical north south sides. Stairs east end. Three storeys, 5-bays, full height rubble piers, rubble plinth and cornice divided by many paned leaded wooden casements second floor, 6-light end bay, two 4-light, one 3-light and 5-light wooden panels below, first floor mostly replaced with C20 plate glass, ground floor north face masked by additions, south face some casements still remaining, end bay right panelled over with square headed entrance, recessed 8-panel door with inserted light, lit upper 2 storeys on returns. Commended by Pevsner as a good example of an early industrial building. (Pevsner, Buildings of England, South and West Somerset, 1958).

When making a decision on listed building consent applications for works that affects a listed building or its setting, a local planning authority must have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses (sec. 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 applies). Preservation in this context means not harming the interest in the building, as opposed to keeping it unchanged.

The Exmoor National Park Local Plan is a material consideration. Policy GP1 of the Local Plan requires sustainable development within the National Park to conserve and enhance its natural beauty, wildlife and cultural heritage and its special qualities. Policies CE-S4 and CE-D3 provide the principal Local Plan framework for the historic environment. Development affecting heritage assets and

their settings should positively respond to those assets through sensitive design and avoid unacceptable adverse and cumulative effects.

The Local Plan recognises that the adaptive reuse of existing buildings can contribute to sustainable development but requires conversion of traditional buildings to respond sympathetically to their intrinsic quality, character and appearance. Windows are identified as an important consideration and states that existing windows should generally be repaired and retained or replicated where retention is not possible. Local Plan Policy CE-S6 requires materials and design elements used in conversion schemes to complement the local context through traditional and natural sustainable materials.

At national level, the NPPF identifies heritage assets as an irreplaceable resource whose significance should be conserved for the benefit of existing and future generations. The relevant national decision-making policies are contained within Chapter 20 of the August 2026 NPPF and must be considered alongside the development plan and the statutory duties relating to listed buildings and conservation areas.

In accordance with NPPF Policy HE4. 2. any harm to, or loss of, the significance of a designated heritage asset (including from development within its setting) should have a clear and convincing justification in accordance with the policies in Chapter 20.

Policy HE6 of the NPPF requires amongst other things that substantial weight should be given to the heritage asset’s conservation. This is irrespective of whether any potential effect amounts to a positive effect, harm, substantial harm, or total loss of its significance. And any harm will be a matter of considerable importance and weight.

Where a development proposal would harm the significance of a designated heritage asset, in accordance with Clause 4 of NPPF Policy HE6, this should be weighed against any public benefits resulting from the proposal. Important public benefits can include securing the long-term reuse of a vacant or underused listed building.

The former Laundry is important both individually as a Grade II listed building and for the contribution it makes to the Dulverton Conservation Area.

The evidence submitted with the application and the specialist consultation responses identify the principal building as an early nineteenth-century industrial building, originally constructed as a silk or crepe mill and subsequently used as a laundry for more than a century. Its three-storey rubble-stone form and unusually extensive fenestration reflect its original manufacturing function, when high levels of natural light were necessary within the working floors. The relationship between the solid stone piers and extensive areas of glazing is therefore integral to understanding the building's historic function and architectural interest.

The building is also unusually prominent within the Dulverton Conservation Area. Its three-storey scale distinguishes it from much of the surrounding historic

townscape and it makes a positive contribution to views along Chapel Street and towards the Conservation Area from the west. Its significance therefore derives not only from its surviving historic fabric, but from its architectural form, industrial character, fenestration and contribution to the wider townscape.

There is substantial agreement between the heritage consultees that an appropriate residential conversion is capable, in principle, of providing a suitable long-term use for the building.

The Authority's Senior Heritage Officer acknowledges the importance of securing a sustainable future for the building, which has been unused since 2018 and is included on the Authority's Buildings at Risk Register. Historic England similarly welcomes the intention to find a new use for the listed building and accepts that the site has the capacity to accommodate an appropriate residential scheme. The Georgian Group also does not object to the principle of residential conversion.

There is consequently an important heritage benefit in securing the repair, active use and long-term maintenance of the building. The Local Plan, which is a material consideration, itself recognises the sustainability benefits that can arise from adaptive reuse of existing historic buildings rather than demolition and replacement.

The principle of conversion does not, however, provide justification for alterations which would cause avoidable or inadequately justified harm to the significance of the listed building, including its setting.

The proposed works include alterations to the ancillary workshop and boiler-house ranges, including the introduction of first-floor accommodation.

Historic England has expressed concern that the increased massing of the north range would erode views towards the principal mill building on the approach along Chapel Street and consequently harm the character of the Conservation Area. The Authority's Senior Heritage Officer takes a different view, noting evidence that the workshop was formerly a two-storey structure with a dual-pitched roof and considering its reinstatement to represent a benefit.

Having considered the respective specialist views and the relationship between the ancillary ranges and principal mill building, Officers consider that the altered workshop and boiler-house ranges would remain subservient to the principal listed building. Their form, scale and massing would not, in themselves, result in an unacceptable effect upon the significance of the listed building or the character or appearance of the Conservation Area.

The amendment from zinc to timber cladding to the boiler-house extension is also an improvement. Historic England considers timber significantly less visually jarring and the use of natural materials would respond to the traditional local context and historic character of the building and its setting.

The proposed photovoltaic panels would provide renewable energy for the residential development. Although their installation would introduce modern

equipment to the roof of the listed building, the Authority's Senior Heritage Officer considers that their visual impact would be limited because views of the relevant roof slope are restricted. Subject to appropriate detailed design and installation, Officers consider that the photovoltaic panels would not cause unacceptable harm to the significance of the designated heritage asset.

The proposed works would also affect historic fabric and structures associated with the building's former industrial use. The Authority's Historic Environment advice recommends appropriate historic building recording and archaeological monitoring. These matters could be satisfactorily addressed through conditions and do not constitute a reason for withholding listed building consent.

The principal outstanding heritage issue is the proposed treatment of the fenestration.

The existing pattern of multipaned windows is one of the defining features of the former mill and directly expresses its industrial origins and historic requirement for extensive natural lighting. Although the building has undergone alteration and some windows date from later phases, surviving small-pane casements form an important element of its architectural character and significance.

The proposal would replace the existing windows with 48mm triple-glazed aluminium composite units without glazing bars and would introduce aluminium spandrel panels between the windows. The proposed units differ materially in form, detailing and material from the characteristic multipaned timber fenestration.

The Authority's Senior Heritage Officer objects to the proposed window treatment and considers that it would introduce a substantially more domestic appearance to the former industrial building. Alternative approaches have been identified during consideration of the application, including timber windows, vacuum glazing, alternative glazing arrangements and potentially appropriately detailed metal windows. The applicant has nevertheless elected to proceed with the aluminium composite system.

Historic England also maintains concern about the extensive replacement of the existing fenestration and considers that the modern aluminium windows would detract from the character of both the listed building and the Conservation Area. The Georgian Group takes a stronger position and considers that, cumulatively with the proposed internal alterations, the loss and replacement of the characteristic fenestration would result in substantial harm to the significance of the listed building.

For the purposes of this application, Officers consider that the wholesale replacement of the characteristic multipaned fenestration with aluminium composite triple-glazed units, together with the introduction of aluminium spandrel panels, would harm the architectural and historic significance of the Grade II listed building. It would diminish the relationship between the building's architecture and its former industrial function, introduce a more domestic character to its principal elevations and weaken the positive contribution that the building makes to the character and appearance of the Dulverton Conservation Area. The proposal

would therefore harm the significance of the Grade II listed building designated heritage asset. In this regard, the harm is considered to be less than substantial to the significance of the designated heritage asset.

In accordance with the relevant NPPF policies, where a development proposal would harm the significance of a designated heritage asset, the effect on the asset and its significance should be weighed against any public benefits resulting from the proposal.

The heritage assessment involves competing considerations.

Significant weight should be attached to securing the repair and long-term beneficial use of the Grade II listed former Laundry. It has been unused since 2018, is on the Authority's Buildings at Risk Register and requires substantial investment. Bringing it back into active use would constitute an important heritage and sustainability benefit. The Local Plan positively recognises the contribution that appropriate adaptive reuse can make to the long-term future of traditional buildings.

Against this must be weighed the harm arising principally from the proposed fenestration and aluminium spandrel treatment. The evidence demonstrates that fenestration is not an incidental feature of the building but an important expression of its architectural and industrial significance. Less harmful approaches have been discussed during the application process but have not been incorporated into the submitted scheme.

The heritage benefit of securing a long-term use for the former Laundry therefore attracts significant weight. However, that benefit must be balanced against the identified harm to the significance of the same designated heritage asset. The fact that residential conversion may represent an appropriate means of securing the building's future does not, in itself, justify avoidable harm arising from the detailed design of that conversion.

Whilst the applicant has stated that alternative window designs and more traditional materials would not be financially viable and has provided quotations comparing the costs of different window systems, this does not demonstrate that the proposed treatment is necessary. The applicant's own viability evidence indicates that their preferred scheme is itself not financially viable, and no evidence has been provided to demonstrate whether savings could reasonably be achieved elsewhere in the development to enable a less harmful fenestration solution.

Officers are therefore not satisfied that reasonable, less harmful alternatives have been adequately explored or demonstrated to be unviable. Consequently, the identified harm has not been clearly and convincingly justified and is not outweighed by the public benefits associated with securing the building's reuse.

The proposal would not therefore preserve the building or its setting or features of special architectural or historic interest which it possesses. The proposed works would harm the significance of a designated heritage asset and the effect on the asset and its significance is not outweighed by any public benefits resulting from

the proposal, including securing the long-term reuse of the listed building. There would therefore also be conflict with NPPF Policies HE4 and HE6.

PROTECTED SPECIES AND HABITATS

Policy N2 of the NPPF relates to improving the natural environment and Paragraph 1 (f & g) states that to contribute positively to the natural environment and support nature's recovery, development proposals should:

f) Minimise any adverse impacts on biodiversity and include features which support priority or threatened species such as swifts, bats and hedgehogs. Development proposals should incorporate integrated nest boxes (commonly known as swift bricks) into their construction unless there are compelling technical reasons which prevent their use, or would make them ineffective; and
g) Ensure that green infrastructure and other features to support nature are located and designed to minimise risk of future failure, and that appropriate measures are in place or any necessary long-term management.

An Ecological Impact Assessment dated September 2025 has been submitted with the application. Surveys identified day roosts used by lesser horseshoe, serotine, common pipistrelle and soprano pipistrelle bats, together with a lesser horseshoe bat hibernation roost. The proposed works would result in the destruction or modification of these roosts and would therefore require a European Protected Species licence from Natural England before the relevant works commence.

The submitted assessment identifies mitigation and compensation measures, including the sensitive timing and supervision of works, provision of a dedicated bat loft, retention or replacement of suitable bat access points, installation of alternative roosting features and control of external lighting. Measures are also proposed to avoid harm to nesting birds and other protected species during construction.

The Authority's Senior Ecologist raises no objection, subject to the identified avoidance, mitigation and compensatory measures being appropriately secured and implemented. Officers are therefore satisfied that the effects of the proposed works on protected species could be adequately addressed through suitably worded conditions and would not provide a separate reason for withholding listed building consent.

Human Right

The provisions of the Human Rights Act 1998 and Equality Act 2010 have been taken into account in reaching the recommendation contained in this report.

Conclusion

The proposed replacement of the building's characteristic multipane fenestration with triple-glazed aluminium composite units without glazing bars, together with

aluminium spandrel panels, would materially alter the appearance and character of the former mill and erode an important element of its special architectural and historic interest.

Officers attach considerable importance and weight to the desirability of preserving the listed building and recognise the significant public benefit arising from securing the repair and long-term beneficial reuse of this Listed Building. However, the identified harm arises from elements of the detailed design for which less harmful alternatives have not been demonstrated to be unfeasible. The harm has therefore not been clearly and convincingly justified and is not outweighed by the public benefits of the proposal.

The proposal would consequently fail to preserve the special architectural and historic interest of the Grade II listed building, contrary to the statutory duty under section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the relevant heritage policies of the National Planning Policy Framework. Listed building consent should therefore be refused.

Recommendation

Refused

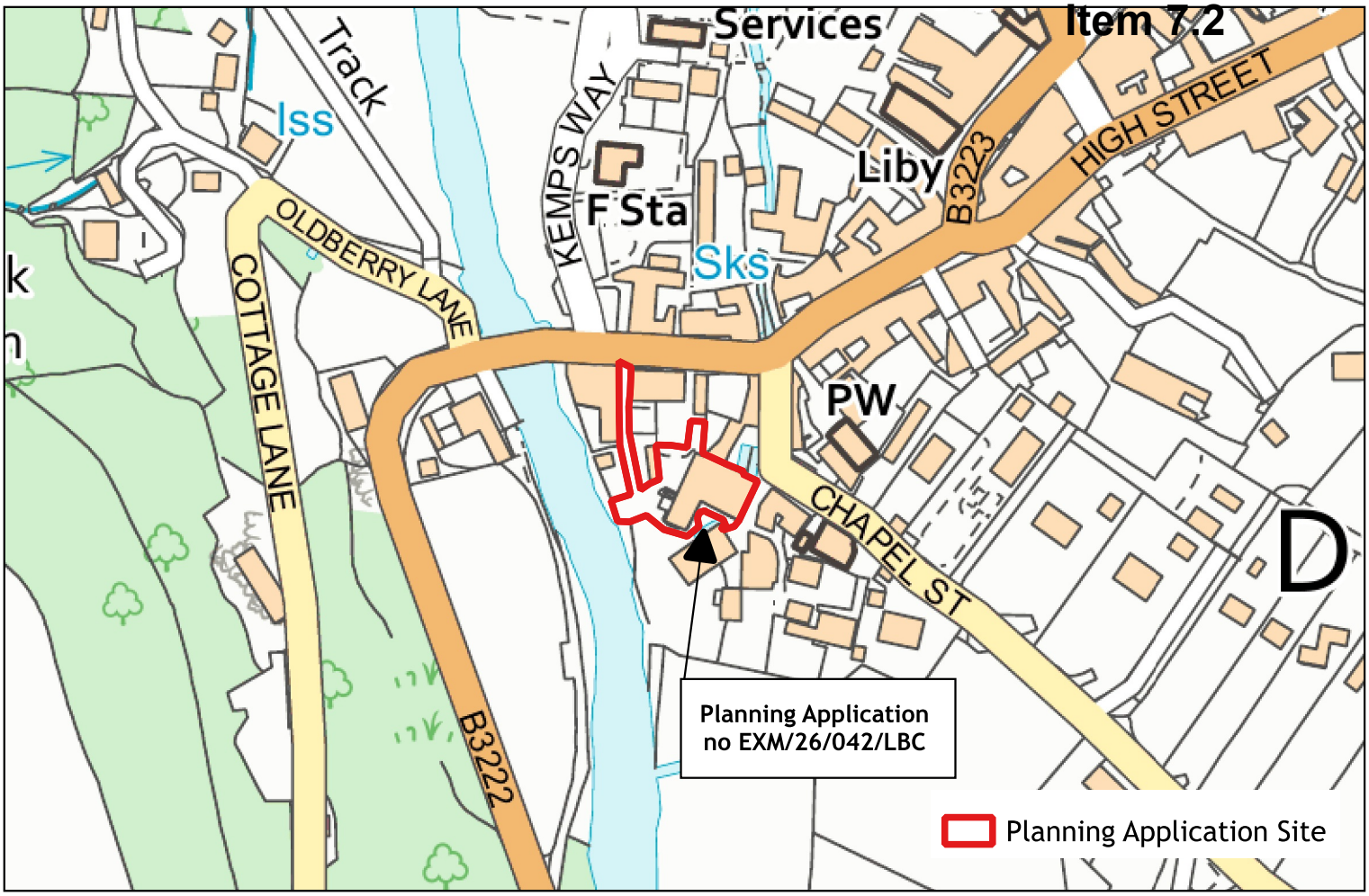
1. The proposed wholesale replacement of the building's characteristic multipane fenestration with 48mm triple-glazed aluminium composite units without glazing bars, together with the introduction of aluminium spandrel panels, would remove historic fabric and materially alter the form, detailing, proportions and material character of the principal elevations of the Grade II listed former Dulverton Laundry. The proposed treatment would erode the architectural relationship between the building's extensive fenestration and its former industrial function and would consequently harm its special architectural and historic interest. Less harmful alternatives, including retention, repair, replication or appropriately detailed alternative window systems, have not been satisfactorily explored or demonstrated to be unfeasible. The identified harm has therefore not been clearly and convincingly justified and is not outweighed by the public benefits associated with securing the repair and long-term reuse of the building. The proposal therefore fails to preserve the special architectural and historic interest of the listed building, contrary to section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and Policies HE4 and HE6 of the National Planning Policy Framework 2026

Informatives

1. POSITIVE & PROACTIVE STATEMENT

   This Authority has a pro-active approach to the delivery of development. Early pre-application engagement is always encouraged. In accordance with the requirements of Article 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015, in determining this

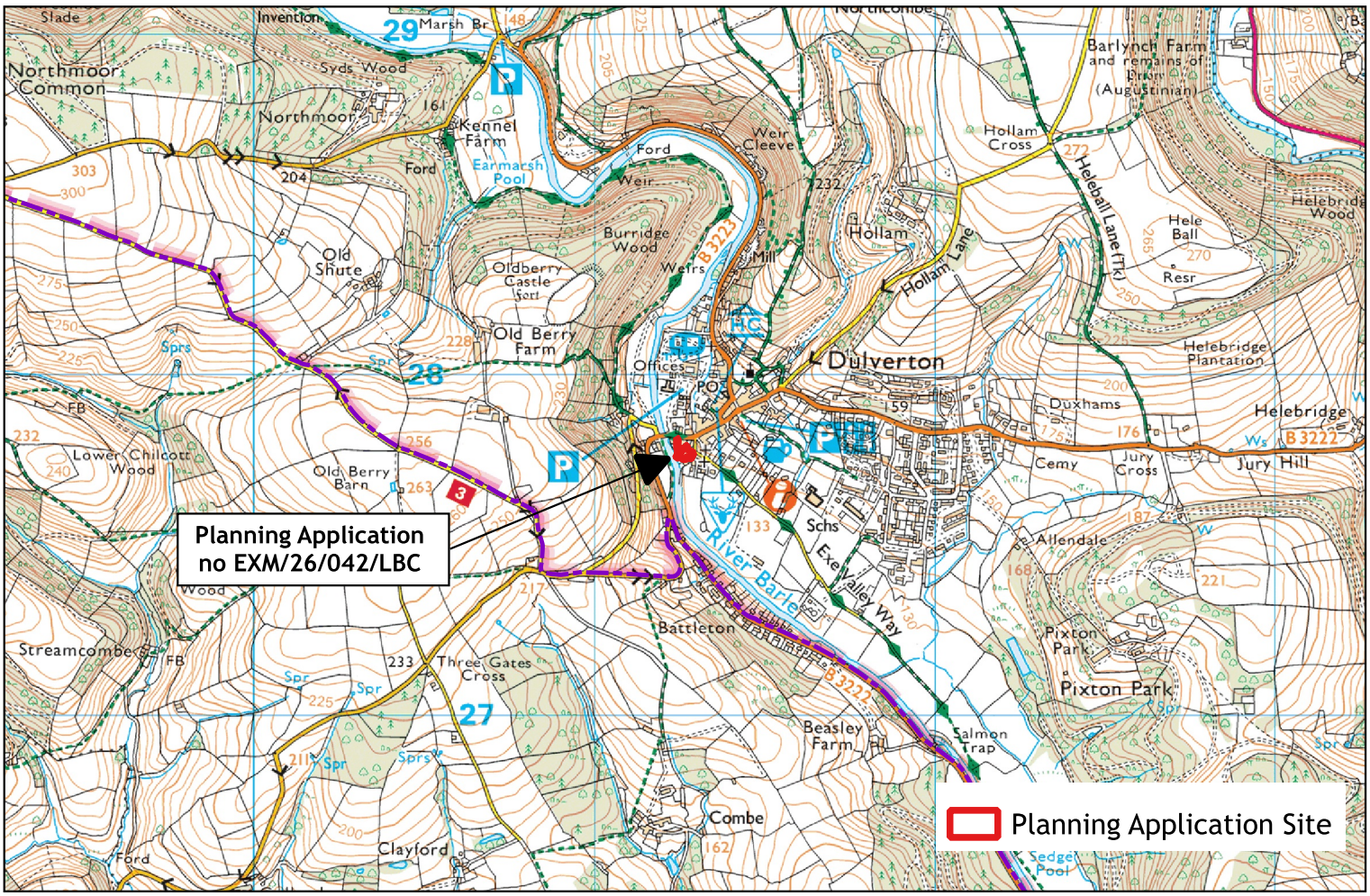
application, Exmoor National Park Authority has endeavoured to work positively and proactively with the agent/applicant, in line with the National Planning Policy Framework, to ensure that all relevant planning considerations have been appropriately addressed to achieve a positive outcome. However, in this instance the relevant planning considerations have not been addressed, and the application has therefore been refused.



Site Map

Scale

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Overview Map

Scale 1:20,000

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Exmoor National Park Authority
Planning Committee
1 December 2026
Agenda Item 8

Exmoor National Park Local Plan

New Exmoor Local Plan: Notice of Intention to Commence Local Plan Preparation, Local Plan Timetable and Scoping Consultation

Report of the Head of Climate, Nature and Communities

Purpose of Report

To seek Member approval to commence preparation of a new Local Plan and publish the Authority's Notice of Intention to Commence Local Plan Preparation; Local Plan Timetable; and Notice of Scoping Consultation.

Recommended Decision

That the Committee:

1. AGREE to commence preparation of a new Exmoor National Park Local Plan and the publication of the Notice of Intention to Commence Plan Making in December 2026 in accordance with regulatory requirements, formally beginning the plan-making process.
2. AGREE the publication of the Local Plan timetable in December 2026 in accordance with regulatory requirements and DELEGATE any subsequent changes to the Chief Executive.
3. AGREE the publication of the Notice of Scoping Consultation in advance of the scoping consultation in January 2027 in accordance with regulatory requirements.

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1. Introduction

1.1 As a local planning authority (LPA), Exmoor National Park Authority has a statutory duty to prepare and adopt a Local Plan to guide development over a minimum 10 year period. The Plan should provide a clear, deliverable and legally compliant spatial strategy and policy framework and set out priorities including for the environment, housing, employment, infrastructure and design.

1.2 The current Exmoor National Park Local Plan 2011-31 includes minerals and waste policies. It was adopted in 2017 and a new Plan must now be prepared.

2. Background

2.1 The Government has introduced a new plan-making system. This has changed how local plans are prepared. The legal framework for new-style local plans is set out in plan-making provisions in the Planning and Compulsory Purchase Act 2004 (as amended). This makes significant changes to plan-making. Accompanying secondary legislation in the Local Planning Regulations 2026 set out detailed procedural requirements for local plans, minerals and waste plans.

2.2 The new system introduces:

- A 30-month process and a framework for creating and adopting local plans;
- Three 'gateway' checkpoints;
- A 'digital-first' approach with standardised data formats and digital tools; and
- Updated national policy, guidance and tools for plan-makers.

2.3 The Government has re-confirmed the plan-led approach to decision-making. Once adopted, the local plan is the principal basis for making planning decisions.

3. Local Plan requirements

3.1 The new Local Plan will cover the whole of Exmoor National Park and needs to be for a period of at least 10-years from the date of adoption (expected 2029). At this stage a Plan period of 2026-2046 is proposed though it may be necessary to review this during plan preparation.

3.2 The Local Plan will build on the Exmoor National Park Management Plan (Partnership Plan) vision and will include a spatial strategy for the sustainable development of Exmoor. The spatial strategy will include areas considered, in principle, to be suitable for growth that is appropriate in a National Park context and policies will set out the approach to nature recovery, climate change mitigation and adaptation, and local community needs such as housing (including affordable housing) and employment. It is proposed, like the current adopted Plan, that the new plan should include minerals and waste policies for the area in the National Park.

3.3 Development management policies will need to focus on local issues including affordable housing, employment, recreational development and visitor accommodation and avoid duplication with new national decision-making policies in the National Planning Policy Framework (NPPF).

3.4 As the Local Plan is prepared it will be supported by a Strategic Environmental Assessment (SEA) which assesses how the plan contributes to improvements in environmental, social and economic conditions, as well as identifying and mitigating

any potential adverse effects that the plan might otherwise have. A Habitats Regulations Assessment (HRA) will also be carried out, which is a legal process used to determine whether a plan could harm protected wildlife sites and whether it can proceed safely.

3.5 The adopted Local Plan is supported by a Landscape Character Assessment and Rural Worker Supplementary Planning Documents (SPDs). Under the new plan-making system, SPDs are known as Supplementary Plans with the same status as the development (local) plan and subject to independent examination. The Authority will need to consider which aspects of the current SPDs are to be covered in the Local Plan or whether they are to be reviewed.

4. Governance

4.1 Local Plan preparation will involve close working between officers, members, and stakeholders. Effective project management will be needed to meet requirements and work within the Government's timescales, and a Project Initiation Document will be completed. Specialist legal advice may be required during the plan-making process.

4.2 The Planning Committee can make decisions regarding the commencement of the Local Plan process, scoping and consultation stages, evidence and preparatory work and other intermediate stages in preparing the Local Plan.

- Proposed decision making - Planning Committee will be responsible for agreeing the commencement of the Local Plan process and the draft/proposed Local Plan for consultation. The adoption of the Local Plan will be reserved to the Full Authority.
- Planning Policy Advisory Group (PPAG) - Members will play a key role through PPAG, guiding drafting of the Local Plan and receiving updates to inform consideration of other key Local Plan milestones. Local Plan issues and updates will be shared with PPAG meetings prior to Planning Committee/Authority decisions as above. In order to work within the Government's ambitious timescales, it is proposed to make use of existing powers, delegated from Planning Committee to the Chief Executive, for all key plan milestones except those to be agreed by the Planning Committee and Authority as set out above.
- Lead officers - The Policy and Community Manager has day to day responsibility for preparing the Local Plan, reporting to the Head of Climate, Nature and Communities. Lead officers will project manage the Local Plan reporting to Leadership Team. The Policy team is equivalent to 1.8 full time officers plus assistance from the Planning Technician as required and subject to workloads. Recruitment of an additional post is underway to support the team.

5. Work to date

5.1 PPAG has received updates on the new plan-making system and national policy changes. In July 2025, a workshop was held to consider the existing Local Plan policies and help guide and scope key areas of focus in advance of preparing a new Local Plan. The Group met in October 2026 to consider the proposed Local Plan timetable.

5.2 Early officer preparations for the new Local Plan have included ongoing monitoring of the adopted Local Plan, discussions with Authority officers, evidence gathering on community facilities with help from parish and town councils, and joint collaboration with neighbouring authorities. Housing and economic need, affordable housing need,

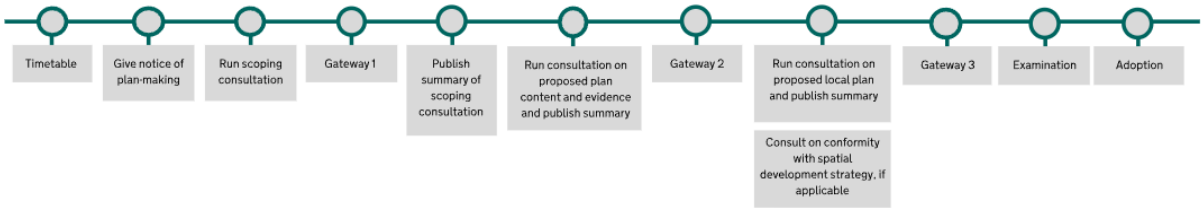
flood risk, playing pitch and sports facilities and gypsy and traveller assessments have been completed or are ongoing. Other information that may contribute to the evidence base includes the outcomes of an affordable housing delivery stakeholder workshop held in 2025 and evidence gathered as part of the 5-year review of the Local Plan concluded in 2022. Work to update the Local Plan contacts database and an engagement strategy are also underway.

6. Local Plan process overview

6.1 In addition to legal requirements, Government expectations for plan preparation and the 30 month timescales are set out in national guidance. The guidance includes the diagram below illustrating the main stages and timings in the 30-month process. At the start of the process is a minimum 'get ready' 4-month period.



6.2 A number of tasks in local plan-making are required by law.



Get ready' stage (first 4 months)

6.3 Before the 30-month period begins, several tasks are required by Local Plan Regulations to get ready for the Local Plan process. The Authority must produce and publish three notices: a Notice of Intention to Prepare a Local Plan, a Local Plan timetable and statement the timetable is to have effect; and a Notice of Scoping Consultation. The diagram below illustrates the main tasks to complete and the order in which they must happen.



6.4 **Notice of Intention to Prepare a Local Plan** - The 2026 Local Plan Regulations require the Authority to publish a formal notice of intention to prepare a Local Plan (a 'notice to commence') a minimum of 4 months' before beginning preparation of the new plan and at the latest by 31 December 2026. The notice will specifically mention that the new Local Plan will include minerals and waste policies – this is a legal requirement. The Regulations dictate its contents.

6.5 **Local Plan timetable** - The Authority must publish the first version of the Local Plan timetable and a statement the timetable is to have effect before or on the same day as the Notice of Intention to Prepare a Local Plan.

6.6 The timetable must include the key milestone dates for the process of preparing a plan which, as stated above, will also include minerals and waste policies. Authorities are required to check each month whether updates to the timetable are needed. Government advises there should not be a need for full approval each time the timetable is updated. The proposed timetable for required stages of the new Exmoor National Park Local Plan preparation is set out below.

Proposed Date	Stage
7-17 December 2026	Publish 'Notice of Intention to Commence Local Plan Preparation', Timetable and Notice of Scoping Consultation
18 January-1 March 2027	Scoping consultation
By 30 April 2027	Gateway 1: Publish Self-Assessment summary
November – December 2027	Consultation on proposed plan content and evidence
June 2028	Gateway 2 Assessment – check progress with the Planning Inspectorate
August – October 2028	Consultation on proposed Local Plan
March 2029	Gateway 3 Assessment- examination readiness
April 2029	Submission of the proposed Local Plan for independent Examination

Proposed Date	Stage
May 2029	Examination
November 2029	Adoption of the Local Plan

6.7 **Notice of Scoping Consultation** - The Local Plan timetable includes a scoping consultation - a required task in the first stage of getting ready to prepare a Local Plan. The Authority must publish a notice of a scoping consultation and it is proposed to publish this at a similar time to the above notices (it cannot be published before) to give advance notice to stakeholders of the intention to start the scoping consultation in January 2027.

6.8 Regulations require that the scoping consultation should include relevant matters the Authority considers appropriate to the preparation of the Local Plan including what the plan should contain, and how the Authority should engage with stakeholders and consultees as the plan is prepared.

6.9 Local Planning Authorities can consult on additional matters and current thinking is that it would be helpful to identify and ask for initial views on a draft vision, areas of focus and taking forward the approach to the spatial strategy.

6.10 The starting point is that the current Plan remains fit for purpose and there is much that remains relevant. However, a new Plan will need to take account of changes since the last plan was adopted in 2017, not least national policy changes in the August 2026 National Planning Policy Framework (NPPF) and the introduction of 'local plan–style' national decision-making policies that the NPPF says Local Plans should not duplicate, substantively restate or be inconsistent with.

6.11 The scoping consultation and approach to engagement will be discussed with Planning Policy Advisory Group in advance of the consultation in January. It is proposed to support the consultation with a current thinking document online. While Regulations require a minimum 3-week scoping consultation, it is proposed that for Exmoor it should be 6 weeks.

6.12 **Engagement** - Members will be involved in shaping the content and arrangements for public consultation. The aim will be meaningful and proportionate engagement with members, and stakeholders including local communities, parish / town councils, businesses, local groups, statutory bodies and other organisations throughout plan preparation. Engagement will take place at each plan making stage as required by Regulations. In line with government recommendations, engagement will use digital tools but will not be fully digital.

- Get ready – scoping and early participation. The scoping consultation will take place between January and March 2027 before the Gateway 1 self-assessment is completed which will start the formal 30-month local plan timetable.
- Prepare the plan – proposed content and evidence. Consultation is expected in late 2027.
- Prepare the plan – proposed plan. Consultation is expected in summer/autumn 2028 before progressing to Gateway 3 and public examination of the plan.

7. Legal and policy considerations

7.1 Strategic alignment – Local Plans will be required to align with Spatial Development Strategies (SDS). Currently, there is no SDS for the Exmoor area which, in time, will be covered by two SDSs. Early preparations for a SDS for Devon are underway while confirmation of its geographical coverage is awaited. A Wessex SDS for a number of Council areas, including Somerset, will also be prepared.

7.2 The Exmoor Local Plan will need to take account of cross-boundary issues, particularly for the new Somerset Local Plan and joint Local Plan for North Devon and Torridge (and the existing North Devon and Torridge Local Plan and West Somerset Local Plan pre-dating local government reorganisation in Somerset), Devon and Somerset Minerals and Waste Local Plans, and a range of other plans. Relevant Devon and Somerset-wide strategies include Local Nature Recovery Strategies.

7.3 Legal implications – As a Local Planning Authority, Exmoor National Park Authority has a statutory duty to prepare and adopt a Local Plan.

7.4 The Government has re-confirmed the plan-led approach to decision making. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that determination must be made in accordance with the plan unless material considerations indicate otherwise.

7.5 The legal and national policy framework for new-style local plans are set out in plan-making provisions in the Planning and Compulsory Purchase Act 2004, as amended by the Levelling-up and Regeneration Act 2023 with accompanying secondary legislation in The Town and Country Planning (Local Planning) (England) Regulations 2026 which sets out detailed procedural requirements for local plans, minerals and waste plans.

7.6 Following the recommendations of this report will enable the Authority to commence plan-making in line with legal requirements.

7.7 Equality implications – There are no foreseen adverse impacts on any protected group(s). Equalities impacts and the approach to engagement will be considered as part of Local Plan preparation to consider the needs of these groups in policy-making, and seek to reach protected groups and 'hard to reach' audiences during consultation and engagement.

7.8 Financial implications – The Authority has a budget for preparation of a new Local Plan.

7.9 Risk management implications – The preparation of the Local Plan to adoption is a significant and complex project and care will be needed to ensure that necessary procedures are followed. Risks will be considered as part of the Project Initiation Document before Gateway 1.

7.10 Climate implications – The Plan will help deliver the Exmoor Management Plan vision, objectives and targets to mitigate and adapt to climate change.

8. Conclusion and next steps

8.1 The Notice of Intention to Commence Plan Preparation, the Timetable and Statement that the timetable is to have effect will be published in December. It is intended that the Notice of Scoping will be published at a similar time but in any case in advance of the consultation taking place from January to March 2027 before the Gateway 1 self-assessment is completed in April. This will mark the end of the 'getting ready' stage and

the start of the formal 30-month local plan timetable in line with Government expectations.

8.2 At this stage it is anticipated that a consultation on the contents of the Local Plan will take place at the end of 2027 and then on a proposed or draft Local Plan in summer/autumn 2028. The Plan will then need to be independently examined (spring 2029) to enable adoption in November 2029.

8.3 The first steps starting in December are a formal legally required stage in the plan-making process to enable the Authority to prepare a new Local Plan and the Authority is required to publish a notice of intention by 31 December 2026 and make available a self-assessment summary by 30 April 2027. The Scoping Consultation will seek initial views on the new plan - no decisions on the content of the Plan have been made at this stage.

Ruth McArthur
Policy and Community Manager
rmcarthur@exmoor-nationalpark.gov.uk
17 November 2026

Appendices

- None

Background papers

- None

EXMOOR NATIONAL PARK PLANNING MEETING

Application decisions delegated to the Chief Executive

Application	Applicant	Decision Date	Decision
EXM/26/157/FULL	Mr Richard Jeffrey	06 Nov 2026	Approved with Conditions

Providence Methodist Chapel
Church Street
Timberscombe
TA24 7TR

Proposed Change of use from Use Class F1 & F2 to Residential Annexe under Use Class C3.

Application	Applicant	Decision Date	Decision
EXM/26/173/FULL	Cole	11 Nov 2026	Approved with Conditions

South Heasley, Heasley Mill, South Molton, Ex36 3Le

Proposal to create one new General Purpose Agricultural Building, together with the regularisation of a new farm track, hardstanding area and associated landscaping.

Application	Applicant	Decision Date	Decision
EXM/26/193/DOC	Dr Sarah Webb	26 Oct 2026	Withdrawn

Gate Cottage
Bossington Road
Selworthy
Minehead
TA24 8HJ

Discharge of Condition 3 (Ironmongery) of approved application 6/29/25/006LB

Application	Applicant	Decision Date	Decision
EXM/26/196/CLE	St Austell Brewery Company Limited	09 Nov 2026	Certificate Of Lawfulness Granted

The Blue Ball Inn, Countisbury Hill, Lynmouth, Lynton, Ex35 6Ne

Lawful Development Certificate for Existing Use/Development to begin the development of the erection of 4no. linked cabins for use as holiday lets set out in Planning Permission 62/11/22/019, work has been undertaken on the site in the form of digging a trench and excavation works. It is considered these works demonstrate that a material engineering operation has occurred on site as defined by Section 56(4) of the Town and Country Planning Act 1990.

Application	Applicant	Decision Date	Decision
EXM/26/203/HH	Ian Price	04 Nov 2026	Approved with Conditions

Winder Cottage
Minehead
TA24 8SL

Proposed Shepherds Hut Granny Annex.

Application	Applicant	Decision Date	Decision
EXM/26/206/HH	Nigel Jolley	02 Nov 2026	Approved with Conditions

Woodside
Roadwater
Watchet
TA23 0RG

Proposed replacement of rotten double doors and windows to an existing outbuilding.

Application	Applicant	Decision Date	Decision
EXM/26/217/HH	Mr & Mrs Philip & Anna Douglas & Coull	11 Nov 2026	Approved with Conditions

Morton House
Fairgarden Road
Wootton Courtenay
Minehead
TA24 8RE

Proposed erection of a two bay detached garage.

Application	Applicant	Decision Date	Decision
EXM/26/225/DOC	Mrs Karin Harwood	16 Nov 2026	Approved

Heather House
Brendon Hill
Watchet
Somerset
TA23 0LL

Discharge of Conditions 4 (Post WSI Report), 9 (Landscaping) & 11 (HMMP) & Statutory BNG & BGP of approved application EXM/26/143/FULL

Application	Applicant	Decision Date	Decision
EXM/26/238/DOC	Mr Richard Wolfstrome	28 Oct 2026	Approved

Lyn House
Lynway
Lynton
EX35 6AX

Discharge of Condition 3 (Roofing & Chimney) of approved application EXM/26/175/LBC

Application	Applicant	Decision Date	Decision
EXM/26/244/DOC	Tim Borrett	28 Oct 2026	Approved

The Nook
Parracombe
Barnstaple
EX31 4PE

Discharge of Condition 3 (Joinery details) of approved application EXM/26/159/LBC

Application	Applicant	Decision Date	Decision
EXM/26/245/DOC	Mr and Mrs I & A Poad	11 Nov 2026	Approved

Furzemoor
Exford
Minehead
TA24 7NA

Discharge of condition 6 (Landscaping) of approved application EXM/26/186/FULL

Application	Applicant	Decision Date	Decision
EXM/26/247/DOC	Russell Vowles	13 Nov 2026	Approved

Swiss Lodge
Parsons Street
Porlock
Minehead
TA24 8QN

Discharge of Conditions 3 (Drainage),4 (Landscaping),5 (Slate) & 6 (Cladding) of approved application EXM/26/014/VOC
