

# **SCHEDULE OF RESPONSES TO THE EXMOOR NATIONAL PARK PUBLICATION DRAFT LOCAL PLAN 2011 - 2031**

**REGULATION 19 CONSULTATION: 15 JUNE – 31 JULY 2015**

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The following schedule sets out the responses received during the consultation on the Exmoor National Park Publication Draft Local Plan 2011-2031. The consultation was held between 15 June and 31 July 2015 in accordance with regulation 19 of the Town and Country Planning (Local Plan) (England) Regulations 2012. The Draft Statement of Community Involvement was also available for consultation during this period.

The responses are set out in respondent order (not in order of the plan) so all the comments made by an individual or organisation are listed collectively. The table provides the following information:

- **Respondent no.** – the number assigned to the individual or organisation responding to the consultation.
- **Representation no.** – the number which identifies the individual/organisation and the individual comment.
- **Name / organisation** – lists the name of the individual and/or organisation they represent (some organisations are represented by an agent which is not listed in the table) – no personal contact information is made available.
- **Legal Compliance** – respondent may indicate whether or not they consider the Plan complies with the legal tests set out under regulation 20(5)(a) of the Planning and Compulsory Purchase Act – where is not indicated “not stated” is entered.
- **Complies with Duty** – respondent may indicate whether or not they consider the Plan complies with the Duty to Co-operate which requires that a local planning authority engages constructively, actively and on an ongoing basis with relevant or prescribed bodies to maximise the effectiveness of the plan – where is not indicated “not stated” is entered.
- **Local Plan sound?** – respondent may indicate whether or not they consider the Plan is sound (positively prepared, justified, effective and consistent with national policy) – where is not indicated “not stated” is entered.
- **Comments relating to soundness** – general comments relating to the soundness of the Plan (see above).
- **Local Plan Section, Paragraph, Policy or Map Number** – explains the part of the Plan the respondent is commenting on.
- **Detail of representation** – the main content of the response to the Plan – this may include evidence to support the response.
- **Modifications sought** – modifications to the Plan suggested by the respondent.

Please note that some text may be repeated where an individual/organisation makes the same comment in relation to a number of policies. Other representations may not appear as they were submitted as various parts of the response may relate to different areas of the Plan and may be split accordingly; whilst text may be redacted for potentially defamatory, erroneous or pejorative words or phrases.

Any queries relating to the content should be sent to [localplan@exmoor-nationalpark.gov.uk](mailto:localplan@exmoor-nationalpark.gov.uk)

Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
0001	0001/01	Mr Peter Bowes	Yes	Yes	Yes		8 8.105- 8.111 RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY		
0002	0002/01	Mr Colin Styles	Not Stated	Not Stated	Not Stated		8 RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	<p>I am so thrilled to read in your plan that provisions are to be made for the complete reinstatement of the Lynton and Barnstaple Railway. This is excellent news and will be a huge boost to those dedicated people who have worked and are working so hard to rebuild it for future generations.</p> <p>Once completed it will be a major asset to Exmoor and can only enhance and do good for the environment, the local inhabitants and visitors.</p> <p>Well done, you have my total support.</p>	

Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
0003	0003/01	Mr Timothy Roy	Yes	Yes	Yes		RT-D13 - Safeguarding Land Along Former Railways	As a long-standing member of the Lynton & Barnstaple Railway Trust I fully endorse the draft policy. It is vital to protect the track bed from other developments in order to achieve re-instatement of the railway. The re-instatement of the railway supports the plan objectives of achieving a sustainable economy and enjoyment for all the National Park. The railway will spur to tourism which is the main driver of the economy. The original railway is world-renowned, and the re-instated railway will draw visitors from all over the UK and abroad wishing to enjoy the experience of travelling by such iconic trains through such a beautiful landscape. Due to the relatively isolated location, visitors are likely to visit other attractions in the area too, and significantly increase income in the local hospitality and leisure sectors.	

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0003	0003/02	Mr Timothy Roy	Yes	Yes	Yes		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	As a long-standing member of the Lynton & Barnstaple Railway Trust I fully endorse the draft policy. It is vital to protect the track bed from other developments in order to achieve re-instatement of the railway. The re-instatement of the railway supports the plan objectives of achieving a sustainable economy and enjoyment for all the National Park. The railway will spur to tourism which is the main driver of the economy. The original railway is world-renowned, and the re-instated railway will draw visitors from all over the UK and abroad wishing to enjoy the experience of travelling by such iconic trains through such a beautiful landscape. Due to the relatively isolated location, visitors are likely to visit other attractions in the area too, and significantly increase income in the local hospitality and leisure sectors.	
0004	0004/01	Mr Tony Shackell	Yes	Yes	Yes		8 8.98	The Lynton and Barnstaple Railway have done a wonderful job at Woody Bay rebuilding the railway which blends in nicely with the landscape, by extending it parts of the national park i.e. Whistlandpound Reservoir would be easier to access and communities along the route like Parracombe would see an increase in visitors to village shops, pubs etc. making the village more sustainable.	

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0005	0005/01	Mr Andrew Lowe	Yes	Yes	Yes		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	Although I live in Northumberland, I visit Exmoor Park several times a year, and last year I purchased a week's timeshare in a property located within the Park. The reinstatement of the Lynton and Barnstaple Railway will not only enhance the visitor's experience of the Exmoor National Park, but will bring economic benefits to the area, and reduce the number of private car journeys. I am supportive of the Plan.	
0006	0006/01	Mr John West	Yes	Yes	Yes		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	Broadly I am in support of the railway restoration and the Policy RT-S2 Reinstatement of the Lynton Barnstaple Railway Policy 1. Sub paras a) to i). My concern is that there should be discretion to allow the railway to be reinstated without the word being too pedantically applied.	

0007	0007/01	Mr David Cook	Not Stated	Not Stated	Not Stated		6 Achieving a Thriving Community	<p>We are unsure which sections of the form, part B, if any, would apply to our concerns and do not wish to incur the costs of employing a professional.</p> <p>Our concern is simple and we believe would apply to many of the long term residents of the park: we have spent the majority of our working lives in and adjacent to the park; me as a builder and, my wife, in the education and health sectors. After seven years of looking for a property we were able to afford, in 1979 we purchased a property and built the house we now live in.</p> <p>The land is split in two sections by a farm access track. From the outset, our plan for our retirement was to build a smaller house on the other side of the track, enabling us to have the same aspect from the property we have owned and enjoyed for the past 36 years and to stay in the village we love.</p> <p>We believe there should be a provision in the new plan for people like ourselves who have planned their future to remain in the park in a house suited for their retirement and in the position they planned.</p> <p>Please contact us, if you consider our concern would apply to any of the items 2-8 of the form, part B.</p>	
0008	0008/02	Mr Andrew Keene	Not Stated	Not Stated	Yes		RT-D13 - Safeguarding Land Along Former Railways	Pleased to see that land along former railways will be safeguarded.	

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0009	0009/01	Miss Carla Jackson Natural England	Not Stated	Not Stated	Not Stated			Comment on Draft Statement of Community Involvement	
0010	0010/01	Dr David Rosenthal	Yes	Yes	Yes		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	I have been a supporter of the reinstatement of the Ffestiniog and Welsh Highland railways in Snowdonia since these efforts started and have observed their significant positive effects on the local economy. Accordingly, I have supported reinstatement of the Lynton & Barnstaple railway. I believe the RT-S2 policies, especially concerning the re-use and replication of historic buildings and structures, will contribute to similar positive effects while mitigating some of the negative aspects, for example the use of portable but as it turned out not very temporary station buildings on the WHR.	
0011	0011/01	Mr John Heys	Yes	Yes	Yes		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	I fully support the reinstatement of the Lynton & Barnstaple Railway. This will form an important transport link and create significant local employment both on the railway itself and in tourist-related enterprises in the Exmoor National Park area.	



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0011	0011/02	Mr John Heys	Yes	Yes	Yes		RT-D13 - Safeguarding Land Along Former Railways	I fully support the safeguarding of land along former railways, in order that these linear heritage routes can be preserved for long term public access and enjoyment, ideally by re-opening as railways, especially the Lynton & Barnstaple.	
0012	0012/01	Mr John Daniel	Yes	Yes	Yes		9	The broad aims are sound but more needs to be done to encourage the use of public transport/reduce car visits to the National Park.	Specifically, more emphasis is needed on protection of the L&B railway trackbed and planning encouragement of the restoration/reopening throughout from Barnstaple to Lynton. This will encourage car-free travel and provide a unique, low-impact attraction. I envisage a public transport round trip (unique in UK but modelled on "Norway in a Nutshell") with one/three day round trip via Exeter and Taunton using Network Rail, narrow gauge steam, standard gauge steam (WSR), cliff railway, open-top bus and perhaps, steamship. A great marketing opportunity will be lost if more emphasis isn't placed on L&B trackbed protection.

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0013	0013/01	Mr Tim Lewis	Yes	Yes	Yes		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	I fully support the re-instatement of the Lynton & Barnstaple Railway as mentioned in the Local Plan.	
0014	0014/01	Rev Bernard Lane	Yes	Yes	Yes		8.105 - 8.111	Since 'discovery' of the present Woody Bay project my family and I have visited the area staying locally (Caffyns) and have booked to stay in December - just one example of how the Railway can only benefit the area economically and provide employment whilst providing an alternative to the car to travel in the area. A brilliant and bold plan which deserves the full support of all. Fully support the consultation proposals.	

0015	0015/01	Mr Nigel Furze	No	Not Stated	No	It is considered that the new draft Local Plan does not accord with the National Planning Policy Framework regarding the re-use of brownfield sites and the local plan should be amended accordingly.	7 7.14	<p>A core principle in the National Planning Policy Framework (NPPF) published March 2012 is to encourage the effective use of land that has been previously developed (Brownfield Land) rather than use virgin agricultural greenfield land, provided that is not of high environmental value. That should not mean that all brownfield sites within the Exmoor National Park received a blanket refusal of all planning applications to re-use or redevelop these sites for new or alternative forms of development. Every Planning applications must be considered on its own merits taking into account the latest guidance and policies. The failure to reuse these lawful previously developed sites whether within a settlement or in the countryside will without doubt lead to a reduction in the land available for business/commercial uses (which induces the tourism industry) and consequently loss of employment opportunities both directly and indirectly.</p> <p>The NPPF stresses the importance (paragraph 17 (that the overarching roles of the planning system should play is a set of core land-use planning principles. The key words are "Land-use" and not as suggested in the Exmoor National Park Local plan where policies refers on a number of occasions to "Buildings". Buildings are built on land but within the curtilage of the buildings there can be significant associated uses which become part of the overall planning use of land. The National Park Authority has a very restricted interpretation of the term of "buildings" which does not include any non-building structure of the use of associated land. Examples of this are shown in paragraph 7.14, policies SE-S1, SE-S2</p>	<p>Below are parts of the local plan which it is respectfully asked should be amended. In the red lettering are the suggested revisions to the wording and highlighted in yellow are the parts of text that are questioned and why.</p> <p>7.14 7.14 Recent economic development has shown that the vitality of the local economy has been sustained without the need for high levels of new build development as much has been delivered through the re-use of existing buildings. The National Park Authority encourages this approach in principle, as the re-use of existing buildings [and the redevelopment of brownfield land] minimises greenfield development and is therefore a more sustainable approach in a National Park, given the limited supply of suitable greenfield land {this highlights the need to generally retain brownfield sites where ever they are} within and adjoining the settlements (GP4 The Efficient Use of Land and Buildings). The change of use to employment can, if carried out sympathetically, also help secure the retention of a</p>
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						<p>and SE-S3.</p> <p>It is also suggested that the Draft Exmoor National Park Local Plan does accord with the following section of the NPPF in particular attention is drawn to the points which have been embolden below.</p> <p>3. Supporting a prosperous rural economy  <b>28. Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should:</b></p> <ul style="list-style-type: none"> <li>• support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings [last part emboldened from 'and'];</li> <li>• promote the development and diversification of agricultural and other land-based rural businesses;</li> <li>• support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres; and [emboldened]</li> <li>• promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship [emboldened].</li> </ul>	<p>building’s character whilst also supporting the local economy in accordance with Policy CE-S5 Principles for the Conversion or Structural Alteration of Existing Buildings.</p>
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								<p>The National Planning Policy Framework recognises the need to create and maintain a vibrant local rural economy and the importance to the tourism and recreational businesses to these areas not only in terms of the development itself but how in can assist other local enterprises.</p>	

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0015	0015/02	Mr Nigel Furze	No	Not Stated	No	It is considered that the new draft Local Plan does not accord with the National Planning Policy Framework regarding the re-use of brownfield sites and the local plan should be amended accordingly.	7 7.29	Paragraph 7.29 seem to ignore the fact that there are sites in the countryside remote from settlements and farmstead which have lawful businesses uses which offer the potential subject to the normal planning safeguards to generate new business opportunities, which in sustainability terms are to the reuse of farm building even with the construction of suitably designed modern day structure. The Draft Local plan is negative in its restricted and should adopt a positive approach to the reuse of all brownfield sites and not just "Buildings". The local plan seeks further restrictions in term of their location having to be within or close to a settlement. Changing practices and other particular use but the manner in which the local plan is drafted is prejudicial in so far as these lawful sites cannot be used for alternative uses and there is no mention of what will become of these brownfield sites. Is it the National park wish that they become neglected, dangerous and have significant impacts on the visual amenities of the countryside?	The alternative is to allow these brownfield sites particularly where there has been a previous lawful commercial/business use to make a future contribution to the economic well being of the Exmoor National Park where it accords with other objectives of the local plan.

0015	0015/03	Mr Nigel Furze	No	Not Stated	No	It is considered that the new draft Local Plan does not accord with the National Planning Policy Framework regarding the re-use of brownfield sites and the local plan should be amended accordingly.	SE-S1 - A SUSTAINABLE EXMOOR ECONOMY	The NPPF stresses the importance (paragraph 17) that the overarching roles of the planning system should play is a set of core land-use planning principles. The key words are "Land-use" and not as suggested in the Exmoor National Park Local plan where policies refers on a number of occasions to "Buildings". Buildings are built on land but within the curtilage of the buildings there can be significant associated uses which become part of the overall planning use of land. The National Park Authority has a very restricted interpretation of the term of "buildings" which does not include any non-building structure of the use of associated land. Examples of this are shown in paragraph 7.14, policies SE-S1, SE-S2 and SE-S3.	SE-S1 A SUSTAINABLE EXMOOR ECONOMY 1. In order to strengthen, enhance and diversify the Exmoor economy, business and employment development will be encouraged. 2. Proposals for business development, including extensions and/or the growth and intensification of existing businesses, should demonstrate they will not have an unacceptable adverse impact including in terms of their operations, activity, and scale, on local amenity, landscape character, cultural heritage, sensitive habitats and wildlife. 3. Opportunities for home working and home based employment will be encouraged in accordance with policy SE-D1 home based businesses. 4. Existing employment land and buildings will be safeguarded in accordance with policy SE-D2. [Not in the Countryside]
0015	0015/04	Mr Nigel Furze	No	Not Stated	No	It is considered that the new draft Local Plan does not accord with the National Planning Policy Framework	SE-S2 - BUSINESS DEVELOPMENT IN SETTLEMENTS	The NPPF stresses the importance (paragraph 17) (that the overarching roles of the planning system should play is a set of core land-use planning principles. The key words are "Land-use" and not as suggested in the Exmoor National Park Local plan where policies refers on a number of	SE-S2 BUSINESS DEVELOPMENT IN SETTLEMENTS 1. In the named settlements proposals for business development or extensions to existing businesses should

						regarding the re-use of brownfield sites and the local plan should be amended accordingly.		occasions to "Buildings". Buildings are built on land but within the curtilage of the buildings there can be significant associated uses which become part of the overall planning use of land. The National Park Authority has a very restricted interpretation of the term of "buildings" which does not include any non-building structure of the use of associated land. Examples of this are shown in paragraph 7.14, policies SE-S1, SE-S2 and SE-S3.	accord with policy SE-S1 and be located within the settlement or where no suitable buildings/sites are available, well-related to existing buildings. 2. Proposals will be permitted where: a) they reuse existing traditional buildings wherever possible, in a way that maintains and enhances their character, or where no suitable buildings are available; b) they reuse non-traditional buildings, or previously developed [brownfield] sites and proposals achieve enhancement, or where this cannot be achieved; c) a replacement of a non-traditional building, or a new site/building may be permitted. 3. In addition to clause 1, any proposals for new build development in Porlock Weir, other than extensions to existing premises, should be: a) small-scale to reflect the form and character of the of the settlement; and b) compatible with industries associated with the settlement.
0015	0015/05	Mr Nigel Furze	No	Not Stated	No	It is considered that the new draft Local Plan does not accord with the National Planning Policy	SE-S3 - BUSINESS DEVELOPMENT IN THE OPEN COUNTRYSIDE	The NPPF stresses the importance (paragraph 17 (that the overarching roles of the planning system should play is a set of core land-use planning principles. The key words are "Land-use" and not as suggested in the Exmoor National Park	SE-S3 BUSINESS DEVELOPMENT IN THE OPEN COUNTRYSIDE 1. Business development will be permitted for the [redevelopment of existing



						<p>Framework regarding the re-use of brownfield sites and the local plan should be amended accordingly.</p>		<p>Local plan where policies refers on a number of occasions to "Buildings". Buildings are built on land but within the curtilage of the buildings there can be significant associated uses which become part of the overall planning use of land. The National Park Authority has a very restricted interpretation of the term of "buildings" which does not include any non-building structure of the use of associated land. Examples of this are shown in paragraph 7.14, policies SE-S1, SE-S2 and SE-S3.</p>	<p>lawful brownfield land where there is no adverse impact on other adopted planning policies and the] change of use and conversion of an existing traditional building that is well-related to an existing group of buildings on a farmstead or in a hamlet where there is an existing dwelling, in accordance with policies SE-S1 and CE-S5.</p> <p>2. Proposals for extensions to existing business sites or buildings that are well-related to an existing group of buildings on a farmstead or in a hamlet where there is an existing dwelling will be permitted in accordance with SE-S1 and where the scale and appearance of the development are compatible with local landscape character.</p> <p>3. Additionally, proposals for the diversification of existing agricultural, or other primary businesses responsible for land management, through the re-use/change of use of an existing non-traditional building for business development may be permitted where the following will be achieved:</p> <p>a) they are well-related to an existing group of buildings on the farmstead and accord with policy CE-S5;</p>
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								<p>b) it can be demonstrated that the agricultural use of the existing building(s) to be re-used is redundant;</p> <p>c) the proposed business development supports an existing agricultural or other primary business responsible for land management and does not conflict with the existing farming or land management activity; and</p> <p>d) where proposals relate to the change of use of an existing building from an agricultural use to a business use (use classes B1, B2, B8 or sui generis), a condition may be attached to the permission to enable the building to be used for the purposes of agriculture or the permitted business use.</p> <p>4. The erection of new business premises in the open countryside will not be permitted.</p> <p>5. Business use in buildings which stand alone or which do not relate well to existing buildings and are not part of a farm group or hamlet will not be permitted.</p> <p>{There seem no sustainability issues in asking for business premises to be closely related to farmsteads etc. rather than a</p>
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									<p>few hundred metres up the road. If employment is to be generated staff may need to travel which is difficult on Exmoor. Alternatively is this an attempt to restricted the use so that only the farmer/family can have a business use in which case it will be so restrictive that it may difficult to finance a scheme. The policy has little benefit.}</p>

0015	0015/06	Mr Nigel Furze	No	Not Stated	No	<p>It is considered that the new draft Local Plan does not accord with the National Planning Policy Framework regarding the re-use of brownfield sites and the local plan should be amended accordingly.</p>	8.49	<p>The weakness of the local plan is further highlighted for example in paragraph 8.49 where the following is stated:                  " Camping barns are also often referred to as bunkhouses, backpacker accommodation and hostels. They usually provide very basic accommodation and in more isolated locations very few facilities are provided apart from basic shelter; these are often referred to as 'stone tents'. There are very few camping barns on Exmoor, especially those which are available to the wider public – some remote hostels for example are owned by organisations or private charitable trusts. Camping barns include those well-established facilities at Northcombe Farm near Dulverton and Woodadvent Farm near Roadwater, and establishments run by the Youth Hostel Association (Pinkery and Minehead) within the National Park. Opportunities exist for a network of this type of accommodation to be created, particularly close to existing long distance trails such as the South West Coast Path, Two Moors Way and the Coleridge Way."</p> <p>In this case the Planning Authority has presumably found evidence of the shortage for this type of accommodation but policy RT-D6 is so restricted that again it looks to existing agricultural building which have to be in proximity to farm or hamlet it ignores the fact that there are lawful previously used land building which could be suited for redevelopment to a new use of provided holiday accommodation, subject to normal planning safeguards being introduced. The statement also suggests that the provision of holiday accommodation does not to have welfare facilities within the building. It must surely be</p>	
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								recognised that in the 21st century there is a basic personal hygiene requirement in terms of providing toilet and washing facilities (even on holiday that this should perhaps be provided within the building particularly in remote locations to safeguard other significant environmental considerations.	

0015	0015/07	Mr Nigel Furze	No	Not Stated	No	It is considered that the new draft Local Plan does not accord with the National Planning Policy Framework regarding the re-use of brownfield sites and the local plan should be amended accordingly.	RT-D6 - Camping Barns	The National Planning Policy Framework recognises the need to create and maintain a vibrant local rural economy and the importance of the tourism and recreational businesses to these areas not only in terms of the development itself but how it can assist other local enterprises.	<p>RT-D6 CAMPING BARNs</p> <ol style="list-style-type: none"> <li>1. Proposals for the [redevelopment of a lawful previously used brownfield land to camping barn(s) or hostel or] change of use and necessary alteration of a traditional building to a camping barn or hostel accommodation will be permitted where it complements the historic character and appearance of the building, biodiversity interests, and its setting within the landscape.</li> <li>2. Where the existing building is in a farmstead or hamlet in close association with an existing dwelling, or in a named settlement:             <ol style="list-style-type: none"> <li>a) parking and access arrangements should be incorporated within the hamlet/farmstead without detrimentally impacting on landscape character and visual amenity; or</li> <li>b) parking and access arrangements in a settlement are consistent with policies AC-D1 and AC-S3; and</li> <li>c) utility and service supplies will be routed underground.</li> </ol> </li> <li>3. The change of use and conversion of a traditional barn or building in an isolated location to provide basic shelter</li> </ol>
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									<p>in a camping barn (stone tent) with limited facilities for walkers, will be permitted where it can be demonstrated that:</p> <ul style="list-style-type: none"> <li>a) the building can be managed effectively without new access provision;</li> <li>b) the proposal does not involve alterations to the external fabric and surroundings of the building that would materially affect the character or appearance of the building and its setting;</li> <li>c) the building is well related to the rights of way network or access land; and</li> <li>d) any bat and barn owl roosts that may be present are maintained or replaced.</li> </ul>

0016	0016/01	Mr David Grob	Not Stated	Not Stated	No		8.98	<p>Paragraph 8.98, Removal of the words Reinstatement of the Lynton to Barnstaple Railway.</p> <p>The existing imprint of the old railway should be preserved as it is very much a part of the parks</p> <p>I believe the reinstatement to be a gross misuse of public and private funds and detrimental to the park on many levels.</p> <p>The current plan will turn the western gate to the National Park into a Theme Park, basically a funfair ride from one car park to another. The only justification for reinstatement would be as a transport system and as one it was a complete failure, twice.</p> <p>There is already a loss making railway at the Eastern gate to the Park.</p> <p>The existing imprint of the old railway should be preserved as it is very much a part of the parks history but a reinstatement of the railway would be no different than a reinstatement of Holywell Castle in Parracombe.</p>	<p>Paragraph 8.98, Removal of the words Reinstatement of the Lynton to Barnstaple Railway.</p> <p>The existing imprint of the old railway should be preserved as it is very much a part of the parks history but a reinstatement of the railway would be no different than a reinstatement of Holywell Castle in Parracombe.</p> <p>The existing imprint of the old railway should be preserved as it is very much a part of the parks</p> <p>I believe the reinstatement to be a gross misuse of public and private funds and detrimental to the park on many levels.</p> <p>The current plan will turn the western gate to the National Park into a Theme Park, basically a funfair ride from one car park to another. The only justification for reinstatement would be as a transport system and as one it was a complete failure, twice.</p> <p>There is already a loss making railway at the Eastern gate to the Park.</p>
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0017	0017/01	Mr Duncan Jeffrey Exmoor Society	Not Stated	Not Stated	Not Stated		Whole Plan	<p>The Exmoor Society was consulted on the earlier draft of the Local Plan in November and December 2013. We responded to this consultation and are pleased to see that many of our concerns, expressed at the time, have been taken into account in this latest draft. The Society makes the following general points. The document is:</p> <ul style="list-style-type: none"> <li>• Masterly and clever and infinitely better than the earlier draft.</li> <li>• Precise and detailed and has reduced much ambiguity</li> <li>• Supported by evidence, by documentation of all relevant reports</li> <li>• Easily accessible and decision-making should be easier for the public, applicants, officers and members</li> <li>• The document has made the changes as a result of listening to the consultation exercises</li> <li>• Has worked with difficult circumstances with a moving target of government changes</li> <li>• Is flexible to accommodate future changes</li> <li>• Is positive about what people can do unless special conditions apply.</li> </ul> <p>Specific comments on Changes since the previous Draft Local Plan</p> <p>Whole Plan: There is now adequate cross-referencing in the policies to see how they are linked with others.</p> <p>Final Comment on the Role of the Local Plan: The Society still has reservations on the link between the Local Plan covering the period up to 2031 and the ENPA Partnership Plan (Management Plan), which is a statutory requirement for a 5-year period. How are these two time-scales to be reconciled, and is there</p>	
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Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
								sufficient flexibility in the wording of the Local Plan to accommodate changes within the Partnership Plan and vice versa? Are there circumstances in which the Local Plan could override the statutory purposes of the National Park Authority and if so how will these be reconciled?	
0017	0017/02	Mr Duncan Jeffray Exmoor Society	Not Stated	Not Stated	Not Stated		1	The duty to cooperate is much stronger and the Society welcomes this. It is pleasing to see the spatial portrait at the forefront of the document as it sets the whole scene.	
0017	0017/03	Mr Duncan Jeffray Exmoor Society	Not Stated	Not Stated	Not Stated		2	This section recognises that delivery of statutory National Park purposes is the primary responsibility of the authority. The Society is pleased to see vision 8, but suggests the order is wrong in that it might indicate priorities.	It is the Society's view that Priorities 6, 7 and 8 should be listed above Priority 5.
0017	0017/04	Mr Duncan Jeffray Exmoor Society	Not Stated	Not Stated	Not Stated		3	The presumption in favour of sustainable development, seen as a golden thread throughout the document, is now supported by the Society. The policies supporting National Park purposes are stronger than in the previous document and therefore, as written, should enable a stronger adherence to these statutory purposes.	
0017	0017/05	Mr Duncan Jeffray Exmoor Society	Not Stated	Not Stated	Not Stated		4	The Society is pleased to see that this is a much improved section with greater emphasis on landscape, Heritage Coast and seascape with greater detail provided.	

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0017	0017/06	Mr Duncan Jeffray Exmoor Society	Not Stated	Not Stated	Not Stated		CE-D5 - Advertisements and Private Road Signs	However, four recent planning applications to the Authority have revealed that there is no policy which specifically constrains the use of signs in open country. Policy CE-D5 (Advertisements and Private Road Signs) does not appear to be sufficiently specific to control applications for such signs.	Although the more general policies designed to protect landscape, such as CE-S1 and CE-D1 can be used the Society would press for an additional policy to control signage in open country and in particular on Section 3 land.
0017	0017/07	Mr Duncan Jeffray Exmoor Society	Not Stated	Not Stated	Not Stated		6	The Society believes that this an imaginative approach to the problem of affordable housing, taking into account the very small population and size of settlements within Exmoor.	
0017	0017/08	Mr Duncan Jeffray Exmoor Society	Not Stated	Not Stated	Not Stated		7	Objective 15 is so important within Exmoor as it integrates economic development with environmental achievement. It indicates that the ENPA's involvement in the land economy needs to be developed. The Society believes that Objective 15 should take priority over Objective 14.	
0017	0017/09	Mr Duncan Jeffray Exmoor Society	Not Stated	Not Stated	Not Stated		8	It is not clear whether large-scale events have to apply for planning permission. Is there a threshold that should be introduced that would trigger a planning application? This would be to ensure that recreation did not take precedence over conservation. Reinstating the Lynton and Barnstaple railway is sensible.	

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0017	0017/10	Mr Duncan Jeffray Exmoor Society	Not Stated	Not Stated	Not Stated		10	The Society recognises that much work with local communities has been undertaken by the ENPA in preparation of this section.	
0017	0017/11	Mr Duncan Jeffray Exmoor Society	Not Stated	Not Stated	Not Stated		11	The Society hopes that the ENPA recognises that its officers and members will require extensive training in order to become familiar with the many details of the Local Plan.	

0018	0018/01	Mrs Louise Grob	No	No	No		8.98, 8.103 RT-D13 - Safeguarding Land Along Former Railways	<p>I agree that former railways are important heritage assets, but not that the Lynton and Barnstaple Railway should be reinstated. It was built before road transport as a link for transport and haulage between Lynton and Barnstaple - 2 isolated rural locations. The railway failed twice historically because it was unfavourable, unsafe, uncomfortable and unreliable and expensive. It was not the favoured geological route and was flawed in construction and cost from the outset. The Lynton &amp; Barnstaple Railway Trust do not operate a railway or transport network, this is an unjustified tourist attraction without plausible potential to become a viable or sustainable transport network. It is a narrow gauge line with mock copy carriages with little heritage authenticity.</p> <p>As a tourist business, it is speculative and out of touch with reality or current trends and tourist requirements therefore it cannot justify its claims to redevelopment and change to rural livelihoods and family continuum on Exmoor. In most parts the historic line is not a public right of way, and on my land the conditions with flooding and river crossing would be an impossible access network, or in the ideals of interest - it should be noted that when the railway failed in favour of better road access which suited the terrain of Exmoor more favourably, a by-pass round Parracombe was built to avoid the 1 in 4 hill - which forms part of the A39 - and is in the 'users interest'. It follows the route of the former track bed in part, so there is no additional advantage of taking a tourist ride which is expensive compared to the bus and the road and only gets you from car park to car park. This negates the need and benefits of</p>	<p>The removal of the text "REINSTATEMENT OF LYNTON AND BARNSTAPLE RAILWAY". As this tourist recreation is NOT A RAILWAY nor is it a transport network - and I do not believe having taken into consideration its proposals to date that its aspirations beyond The Calvert Trust are real or achievable. Nor is any of it deliverable financially, as they have not raised money.</p> <p>Paragraph 8.103 cut entirely as it is short term speculative unsupported by finance or business sense. Its proposal is a total fabrication with a delusion expectation and has not addressed the landowners and businesses beyond Blackmoor Gate. Therefore I do not believe that it can be considered as a viable transport proposal. At best it is a recreational development and as such has no rights to public rights of way and pressure on farmers and landowners.</p>
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								<p>reinstatement, while the A39 is the viable and more sustainable alternative. The division of the line around the combe, would make the land unfavourable and to be effective as a structure would require substantial building ground works and land reinforcement to carry a carriage safely - (the existing tourist mile is built on the easy straight without inclines and cross winds, woodland and flooding which exist along the aspirational extension, which this clause seeks to safeguard and reinstate. There is nothing GREEN or sustainable about this proposal. The LBR enthusiasts are not local farmers or landowners and it is totally unjustifiable to move farmers and landowners out in favour of part time, fine weather recreational tourist ride, which would make our land unfavourable and disrupt the peace and tranquillity of the area, as well as the wildlife habitats of protected species and crowd roads which struggle to support local traffic and make our homes and community unfavourable. The noise and smell of the train is unacceptable and history describes it as echoing through the combe noisily. This is not the sort of access and enhancement to the enjoyment of Exmoor that I think benefits the area or complies with National policy.</p>	

0018	0018/02	Mrs Louise Grob	No	No	No	Not consistent with national policy - misleading by definition.	8.104, 8.106, 8.109, 8.110 RT-D13 - Safeguarding Land Along Former Railways	<p>Remove the statement REINSTATEMENT OF THE FORMER LYNTON AND BARNSTAPLE RAILWAY. The aspirations of the Lynton and Barnstaple Railway Trust are speculative and do not stand up to question and scrutiny. It currently functions as a tourist ride, one mile from a car park and back again. This is 'recreation' not a railway or transport network. So it is confusing to the public to describe the "narrow gauge" ride as either historic or as a link or transport let alone a railway. It is also a seasonal attraction and would never be a viable full time ride as the weather and terrain does not favour up hill narrow gauge (which rolls from side to side and derailed at times when in practice formerly) in bad conditions. Water was also a problem historically as the ride was prone to water shortage in summer and closed on peak tourist sunshine outing days. The aspiration is unsound.</p> <p>Built for transport and haulage on rebuild would be a change of use to recreation and tourism which could fundamentally change the nature of Exmoor. Already its community has been diluted by outside weekend railway enthusiasts.</p> <p>The aspirations of the Barnstaple Railway Trust are highly speculative and not anchored or measured with sense, prudence, historic value, sustainability, an understanding of tourism or viable as a stand alone tourist attraction/businesses or have any viable potential as a transport network between Lynton and Barnstaple.</p> <p>Nearby West Somerset Railway loses money annually and fails to attract interest in an age of</p>	<p>Paragraph 8.104, Policy RT-D13: Remove the word "RECREATION" as it is a change of use from the historic purpose of "transport and haulage" and has nothing to do with sustainable modes of travel or alternative access to Exmoor.</p> <p>Remove the words "potential for sustainable modes of travel within Exmoor National Park" as the LBR is not sustainable or a viable mode of transport - from one car park to another and a cost which triples that of the bus offering no different scenic view or links on Exmoor.</p> <p>8.106 There has been no consultation by LBR to take over outbuildings currently owned by landowners and used for agriculture and for the entitlement of the owners own development aspirations.</p> <p>8.109 Safeguarding LBR does not encourage sustainable transport. A regular bus service working evenings and weekends along A39 between Lynton and Barnstaple would do more for the environment and neighbourhood, aiding young, old and unwell. The A39</p>
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								<p>high speed networks - one of which , road, rail or broadband meet or reach this north Devon location needs.</p> <p>It is a short term speculative which does not constitute as a viable or legal clause. It seeks to compulsory purchase land and devalue properties. There has been no compromise or cooperation with landowners. I do not see merit legality or justification for disrupting and robbing the long term residence of the area of their livelihoods and homes of generations whose lives and livelihoods have been in preserving the history and nature of Exmoor authenticity. Caring for its environment agriculturally and socially, in favour of a 'recreational' tourist development which is without funding and cannot justify its claims to deliver economic recovery for the area and rival the Eden Project. I think it would destroy the area disrupting wildlife habitats and the tranquillity of the area. Landowners have not been properly consulted about the change of use of their farm land to recreational use and the additional buildings to be commissioned for railway use, as well as maintenance, access and ground works. It is a gross misinterpretation of what a National park should be and provide.</p>	<p>flanks the historic LBR line and is more financially viable and sustainable throughout the year and is effective within this unusual rural terrain and extreme weather conditions.</p> <p>Current road links from major towns could not support access to the LBR attraction.</p>



0018	0018/03	Mrs Louise Grob	No	No	No		8.110, 8.111 RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	<p>The LBR is not a justifiable transport link, or an effective tourist attraction. Its preparation has not been positive or cooperated appropriately with home owners and landowners affected by its proposal. As a tourist ride on a narrow gauge short line between car parks, I do not think it meets the intention of national policy , as it does not open Exmoor to more people's enjoyment or experience in any way. It is a huge expense of public money which would be better spent on real high speed transport, road, rail and broadband as well as tourist initiatives.</p> <p>It should not be reinstated and could not be reinstated without significant destruction to wildlife and change of character to the area. Farmers do safeguard the route as for most it is their hard line across soft fields making their essential access to their productive farmland. It would be unfarmable if divided between the A39 and river bed. And only maintainable for a very few weeks a year as a ride which are becoming increasingly difficult to predict. It does not have potential to form part of the transport infrastructure. The extended route which would only be deliverable with enforced compulsory purchase (and it cannot be argued as being in the National Interest) and money raised through public and private sources.</p>	<p>RT-S2. change REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY to 'preserving the historic track bed" (as with Holywell Castle). 1.c)i) and with owners cooperation or approval. Farmers have the right to develop barns for their own use and use for agriculture and storage and develop tied dwellings for relatives. There has been no cooperation or consultation to take over sheds and store barns. And large areas for development works. 1.c)ii) where purchased or with owner approval and consultation. 1.c)iii) new build on land purchased, where access is agreed and not taken out of private ownership for railway workers - when there are many houses on the market available for purchase. 1.c)iii) "buildings suitable for re-use" - buildings suitable for change of use recent history very old temporary history versus development. 1.f) It is impossible to construct a bridge that meets any of the criteria or sensitivities. It would be dangerous to the traffic on the adjacent A39. 1. g) I do not like the suggestion</p>
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								<p>that the line becomes a public right of way as it is privately owned land not subject to footpaths or bridleways.</p> <p>1.h) There is no parking suitable in Parracombe and there is not a legal highway through Churchtown, the top of Church Lane by Parracombe Halt, joining the A39, across 150 yards of bridleway, unmade up, maintained by residents.</p> <p>1.i) Within the highways, and not upsetting the historic St Petrocks Church and land protected by covenant.</p> <p>In addition, it should not seek use of privately owned water supply in Churchtown.</p>	

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0019	0018/01	Mr Thomas Wreford	Yes	Yes	Yes		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	<p>The reinstatement of the L&amp;B Railway is not only of local benefit i.e. less traffic in the National Park, increased revenue to the local economy, the possibilities of some further employment vacancies.</p> <p>Historically it is very important, a potential national if not world known heritage attraction, which can only boost the local long standing visitor potential to the North Devon area.</p>	
0020	0020/01	Mr Alan Wreford	Yes	Yes	Yes		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	<p>I fully support RT-S2 and the fully reinstated Lynton &amp; Barnstaple Railway. I consider this reinstatement of the railway is vital for the local economy and tourist industry, but further more is of a world heritage importance!! Also with a fully operational railway, it would help and support the rest of the transport infrastructure in the area, as it was designed to do.</p>	

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0021	0021/01	Mr Ian Cowling Lynton & Barnstaple Railway Trust	Yes	Yes	Yes		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	The Authority has consulted at length with the Lynton & Barnstaple Railway about the re-instatement of the railway in its true and authentic style. The original route is fully accessible except for one residential property in Parracombe constructed on top of the original track-bed. This property can be replaced to the side of the track-bed to allow the linear connection to be achieved. At Lynton the railway can avoid residential development around the original station site and use a route towards the centre of Lynton as described in the Lynton Neighbourhood Plan.	
0022	0022/01	Mr Graham Rider	Not Stated	Not Stated	Yes		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	I support the restoration of the L&B railway and associated plans to protect the route. I visit regularly along with many others and consider the line to be important in attracting visitors to the area as well as contributing to the heritage of the area.	
0022	0022/02	Mr Graham Rider	Not Stated	Not Stated	Yes		RT-D13 - Safeguarding Land Along Former Railways	I support the restoration of the L&B railway and associated plans to protect the route. I visit regularly along with many others and consider the line to be important in attracting visitors to the area as well as contributing to the heritage of the area.	

Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
0023	0023/01	Mr Justin Milward Woodland Trust							

0023	0023/02	Mr Justin Milward Woodland Trust	Yes	Yes	No		CE-S3 - BIODIVERSITY AND GREEN INFRASTRUCTURE	We are pleased to see sub-paragraph 3 of Policy CE-S3 setting out absolute protection of ancient woodland and ancient trees, and also paragraph 7 relating to the expansion of green infrastructure habitats. However the importance of trees & woods to Exmoor in terms of landscape, wildlife, climate change, health & recreation – as set out in the report Unlocking Exmoor’s Woodland Potential: Final Report, Exmoor National Park Authority; Silvanus et al. (2013) – is such that we would like to see a separate dedicated policy for trees & woods on their own.	<p>Proposed addition of new policy -</p> <p>Policy XX-XX Exmoor’s Trees, Woods &amp; Forests</p> <p>Exmoor’s trees, woods &amp; forests make up an unique habitat that requires protecting, conserving and expanding –</p> <ol style="list-style-type: none"> <li>1. Ancient woodland and veteran trees will be protected from development likely to have direct or indirect adverse effects on their conservation objectives, including notified features and ecological functioning of cited habitats and species.</li> <li>2. New native tree planting will be promoted to increase the ecological resilience of existing semi natural habitats including ancient woodland, and also to support the creation of new green infrastructure.</li> <li>3. The restoration of Plantations on Ancient Woodland sites (PAWS) to native broadleaf cover will be supported.</li> </ol> <p>This will make the trees &amp; woods section of the draft Local Plan more justified, effective</p>
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									<p>and positively prepared and will reflect national overarching policy such as the Government’s Forestry Policy Statement of January 2013 and local policy such as ENPA’s own ‘Unlocking Exmoor’s Woodland Potential’ report.</p>

0023 0023/03	Mr Justin Milward Woodland Trust	Yes	Yes	No		CC-S1 - CLIMATE CHANGE MITIGATION AND ADAPTATION	<p>Whilst we are pleased to see Policy CC-S1 and its support for the use of woodland, the current wording of sub-paragraphs 1(d) and 2(c) does not fully explain the benefits of trees and woods in this regard.</p> <p>Woods, trees and hedgerows can play a key role in water management whether reducing flood risk, improving water quality or helping freshwater wildlife thrive and survive - see the Woodland Trust publication Woodland actions for biodiversity and their role in water management (pdf) - <a href="https://www.woodlandtrust.org.uk/mediafile/100083927/Woodland-actions-for-biodiversity-and-their-role-in-water-management.pdf">https://www.woodlandtrust.org.uk/mediafile/100083927/Woodland-actions-for-biodiversity-and-their-role-in-water-management.pdf</a>. Trees can deliver the following water environment benefits.</p> <p>Water quality and river ecology</p> <ul style="list-style-type: none"> <li>• Trees trap and retain nutrients (such as phosphates and nitrates) and sediment in polluted run-off before it reaches rivers and streams.</li> <li>• They can also prevent spray drift of pesticides by providing a physical barrier between fields and watercourses.</li> <li>• Trees provide shade that is essential in helping prevent a rise in river temperatures and helping freshwater wildlife adapt to climate change.</li> <li>• Trees can also provide a source of woody debris in rivers and streams which is beneficial for many species of plants, invertebrates and fish.</li> </ul> <p>Flood risk Trees and woodland can reduce localised flooding and alleviate the effects of larger floods in a</p>	<p>We would therefore like to see amendments to sub-paragraphs 1(d) and 2(c) of policy CC-S1 as set out below (upper case amendments –</p> <p>1(d) – “Measures that support the management of uplands and woodlands INCLUDING NEW TREE PLANTING to assist in carbon sequestration and storage”.</p> <p>2(c) – “Promoting land management which reduces the overall risk of flooding in and around the area, working with natural processes INCLUDING MANAGEMENT AND CREATION OF WOODLAND”.</p> <p>This will make policy CC-S1 more justified, effective and positively prepared and will reflect national policy on the use of woods &amp; trees for climate change mitigation and adaptation.</p>
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							<p>variety of ways, including:</p> <ul style="list-style-type: none"> <li>• Water penetrates more deeply into the woodland soils (higher infiltration rates) leading to less surface run-off.</li> <li>• Trees, shrubs and large woody debris alongside rivers and streams and on floodplains act a drag on flood waters, slowing down floods and increasing water storage.</li> <li>• Trees protect soil from erosion and reduce the sediment run-off, which help the passage of water in river channels, reducing the need for dredging.</li> <li>• The greater water use of trees can reduce the volume of flood water at source.</li> <li>• Trees slow the speed at which rain reaches the ground, with some rain evaporating into the atmosphere - even in winter native deciduous trees intercept up to 12% if rainfall.</li> </ul> <p>Drought</p> <p>Trees can reduce the impact of drought as, under the right conditions, shelterbelts can enable crops to use water more efficiently which could reduce the need for irrigation and lead to less abstraction.</p> <p>A joint Environment Agency/Forestry Commission publication Woodland for Water: Woodland measures for meeting Water Framework objectives states clearly that: 'There is strong evidence to support woodland creation in appropriate locations to achieve water management and water quality objectives' (Environment Agency, July 2011- <a href="http://www.forestry.gov.uk/fr/woodlandforwater">http://www.forestry.gov.uk/fr/woodlandforwater</a> ).</p> <p>The Government's Independent Panel on Forestry (Defra, Final Report, July 2012) has emphasised</p>	
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							<p>these benefits by stating that:                  ‘One of the many benefits of woods and trees is their ability to help us respond to a changing climate, better enabling us to adapt to future temperature increases. We know that trees, in the right places, help us to adapt to climate change by reducing surface water flooding; reducing ambient temperature through direct shade and evapo-transpiration; and by reducing building heating and air-conditioning demands. A landscape with more trees will also help increase the resilience of our rural areas, by reducing soil erosion and soil moisture loss. Improving the condition of existing woodlands, and the creation of a more resilient ecological network of associated habitats, will help wildlife adapt to climate change and other pressures’. This has been endorsed by the response in the Government Forestry Policy Statement (Defra Jan 2013) with the key objective (p.23) ‘Work with other organisations and initiatives to support the further development of markets in forest carbon and other ecosystem services such as water and biodiversity’, together with a Cumbria case study (p.22 - SCaMP) on water benefits from woodland creation.</p> <p>Woodland can help adaptation strategies cope with the high profile threats to water quality and volume resulting from climate change. The Forestry Commission’s publication, The Case for Trees in development and the urban environment (Forestry Commission, July 2010), explains how: ‘the capacity of trees to attenuate water flow reduces the impact of heavy rain and floods and can improve the effectiveness of Sustainable Urban Drainage Systems’.</p>	
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							<p>woodland can help mitigate peak flood flows. The report is available at -  <a href="https://www.woodlandtrust.org.uk/mediafile/100083903/Planting-trees-to-protect-water-RBC-Bluewater-farming-report-evidence.pdf">https://www.woodlandtrust.org.uk/mediafile/100083903/Planting-trees-to-protect-water-RBC-Bluewater-farming-report-evidence.pdf</a>.</p> <p>The Environment Agency and Forestry Commission, together with the Woodland Trust, have developed a Midlands ‘Woodland for Water’ opportunity mapping exercise to prioritise those areas where woodland creation would most benefit water flow and quality -  <a href="http://www.forestry.gov.uk/website/forestresearch.nsf/ByUnique/INFD-97XGXX">http://www.forestry.gov.uk/website/forestresearch.nsf/ByUnique/INFD-97XGXX</a>. The project is hoping to deliver some planting schemes this financial year in Staffordshire at Milwich and Handsacre but are also looking a future potential planting areas such as on the Scotch Brook and possibly around Tittesworth Reservoir. Staffordshire County Council staff are aware of this.</p> <p>The Woodland Trust has carried out partnership riparian planting projects within the Teme Catchment in conjunction with Severn Rivers Trust.</p> <p>As an example of good policy supported by other Local Panning Authorities, the Forest of Dean District Council - Adopted Core Strategy February 2012 sets out that:</p> <p>Policy CSP.2 - Climate Change          Policy - Climate Change Adaptation (Strategic objective: thriving sustainable communities)          3 Biodiversity          1. Developments must support green</p>	
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								<p>infrastructure corridors that link to existing habitat features and networks. They must show that the integrity of any affected nature conservation sites is not compromised by the development proposed. Proposals that prevent or restrict network connections will not be supported.</p> <p>2. Developments will be required to make long lasting biodiversity enhancements which could include the creation of new habitats where these would be appropriate. They should support existing features (trees, ponds, hedgerows etc.), provide and manage public open space and should also provide additional features for a wide variety of species and habitats in appropriate locations throughout the development. Additional features provided should be consistent with the characteristics of the surrounding area.</p> <p>(para) 6.13 Planning has a key role for preparing for climate change(5). All development will be required to adapt to climate change and in doing so will need to show that the appropriate considerations have been taken into account. These include Strategic Flood Risk Assessments which can influence the location of development. Positive land management (either as part of the planning system or outside it) such as native tree planting can for example address flood risk and heating and cooling while providing other environmental benefits. Climate Change, including adaptation, is a core priority within both Community Plans and the Council's Corporate Plan. Associated risks are identified on the council's risk register in terms of the both council operations and potential impacts on the community.</p>	
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Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
0024	0024/01	Mr John Wilkes	Yes	Yes	Yes		8 8.98 - end of section	Safeguarding the land for the Lynton and Barnstaple Railway rebuilding is most important so that the line can be redeveloped in its original form, so preserving the character of the area.	
0025	0025/01	Mrs Deborah Martin	Not Stated	Not Stated	Not Stated		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	I would like to register my support for the plans to expand the Lynton and Barnstaple railway. A very precarious rural economy has the potential to be lifted year on year, with employment for all ages and abilities. Without doubt visiting tourists will welcome the expansion and the entire project will be a showcase for the whole area as well as a beacon for other heritage railways.	
0026	0026/01	Mr Malcolm Harvey	Not Stated	Not Stated	Not Stated		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	Although not a resident, I come to North Devon for walking long weekends every year. Most years this is for eight to ten long weekends. I support the plan to extend the L&B railway with enthusiasm. Already I use the Minehead steam railway as part of my walking weekends.  I believe that an extended L&B railway will be a very positive asset to North Devon. Plus it would allow me to stay in Parracombe and no longer need to use my car whilst on my walking weekends.	

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0027	0027/01	Mr Patrick Armstrong	Not Stated	Not Stated	Not Stated		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	I wish to record my support for the re-instatement of the above railway	
0028	0028/01	Mr Graham Millwood	Yes	Yes	Yes		RT-D13 - Safeguarding Land Along Former Railways		
0028	0028/02	Mr Graham Millwood	Yes	Yes	Yes		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY		
0029	0029/01	M Grace	Not Stated	Not Stated	Not Stated		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	I strongly support the proposal to continue with the rebuilding of the Lynton & Barnstaple Railway. The progress made so far shows the enthusiasm generated by such a project. The work undertaken in restoring rolling stock and the construction of a replica of the engines originally used demonstrates the expertise which is available. There is countrywide support which has made it one of the greatest restoration projects of heritage lines in the country. The team running the railway has to be congratulated in the way that they keep members of the society informed of progress being made.	

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0030	0030/01	Mr David Smith	Yes	Yes	Yes		8.98-8.111		
0031	0031/01	Mrs Maureen Smith Low Carbon Partnership - West Somerset and Exmoor (Strategic Overview Group)	Yes	Yes	Yes		5 Responding to Climate Change		



Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
0032	0032/01	Mr Michael Leslie Smith	Yes	Yes	Yes		8.98-8.111	<p>I FULLY SUPPORT THE REFERENCES AND POLICIES WHICH APPLY TO THE LYNTON &amp; BARNSTAPLE RAILWAY (L &amp; B), AS SET OUT IN THE DRAFT LOCAL PLAN. THE REINSTATEMENT OF THE L &amp; B WILL BRING SIGNIFICANT ECONOMIC, SOCIAL AND RECREATIONAL BENEFITS AND WILL PROVIDE A SUSTAINABLE MODE OF TRANSPORT INTO THE NATIONAL PARK.</p> <p>I WOULD CITE THE EXAMPLE OF THE WELSH HIGHLAND RAILWAY, OF SIMILAR LENGTH TO THE ORIGINAL L &amp; B, THE RESTORATION OF WHICH STIMULATES THE LOCAL ECONOMY TO THE TUNE OF £15 MILLION PER ANNUM. (STUDY BY BANGOR UNIVERSITY). I AM CONFIDENT THAT THE RESTORATION OF THE L &amp; B WILL CONFER AN EQUAL OR GREATER BENEFIT ON THE LOCAL COMMUNITY IN NORTH DEVON.</p> <p>I WOULD URGE THE INSPECTOR TO RETAIN THE WORDING AND SPIRIT OF THIS PART OF THE PLAN AS BEING SPECIFIC TO THE RESTORATION OF THE L &amp; B RATHER THAN A REFERENCE TO A GENERAL RECREATIONAL USE, AS IT IS VITAL THAT THE PLAN FACILITATES THE RESTORATION OF THE L &amp; B, WHICH WILL RESULT IN TREMENDOUS BENEFITS TO THE COMMUNITY.</p>	

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0032 0032/02	Mr Michael Leslie Smith	Yes	Yes	Yes		RT-D13 - Safeguarding Land Along Former Railways	<p>I FULLY SUPPORT THE REFERENCES AND POLICIES WHICH APPLY TO THE LYNTON &amp; BARNSTAPLE RAILWAY (L &amp; B), AS SET OUT IN THE DRAFT LOCAL PLAN. THE REINSTATEMENT OF THE L &amp; B WILL BRING SIGNIFICANT ECONOMIC, SOCIAL AND RECREATIONAL BENEFITS AND WILL PROVIDE A SUSTAINABLE MODE OF TRANSPORT INTO THE NATIONAL PARK.</p> <p>I WOULD CITE THE EXAMPLE OF THE WELSH HIGHLAND RAILWAY, OF SIMILAR LENGTH TO THE ORIGINAL L &amp; B, THE RESTORTION OF WHICH STIMULATES THE LOCAL ECONOMY TO THE TUNE OF £15 MILLION PER ANNUM. (STUDY BY BANGOR UNIVERSITY). I AM CONFIDENT THAT THE RESTORATION OF THE L &amp; B WILL CONFER AN EQUAL OR GREATER BENEFIT ON THE LOCAL COMMUNITY IN NORTH DEVON.</p> <p>I WOULD URGE THE INSPECTOR TO RETAIN THE WORDING AND SPIRIT OF THIS PART OF THE PLAN AS BEING SPECIFIC TO THE RESTORATION OF THE L &amp; B RATHER THAN A REFERENCE TO A GENERAL RECREATIONAL USE, AS IT IS VITAL THAT THE PLAN FACILITATES THE RESTORATION OF THE L &amp; B, WHICH WILL RESULT IN TREMENDOUS BENEFITS TO THE COMMUNITY.</p>	

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0032	0032/03	Mr Michael Leslie Smith	Yes	Yes	Yes		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	<p>I FULLY SUPPORT THE REFERENCES AND POLICIES WHICH APPLY TO THE LYNTON &amp; BARNSTAPLE RAILWAY (L &amp; B), AS SET OUT IN THE DRAFT LOCAL PLAN. THE REINSTATEMENT OF THE L &amp; B WILL BRING SIGNIFICANT ECONOMIC, SOCIAL AND RECREATIONAL BENEFITS AND WILL PROVIDE A SUSTAINABLE MODE OF TRANSPORT INTO THE NATIONAL PARK.</p> <p>I WOULD CITE THE EXAMPLE OF THE WELSH HIGHLAND RAILWAY, OF SIMILAR LENGTH TO THE ORIGINAL L &amp; B, THE RESTORATION OF WHICH STIMULATES THE LOCAL ECONOMY TO THE TUNE OF £15 MILLION PER ANNUM. (STUDY BY BANGOR UNIVERSITY). I AM CONFIDENT THAT THE RESTORATION OF THE L &amp; B WILL CONFER AN EQUAL OR GREATER BENEFIT ON THE LOCAL COMMUNITY IN NORTH DEVON.</p> <p>I WOULD URGE THE INSPECTOR TO RETAIN THE WORDING AND SPIRIT OF THIS PART OF THE PLAN AS BEING SPECIFIC TO THE RESTORATION OF THE L &amp; B RATHER THAN A REFERENCE TO A GENERAL RECREATIONAL USE, AS IT IS VITAL THAT THE PLAN FACILITATES THE RESTORATION OF THE L &amp; B, WHICH WILL RESULT IN TREMENDOUS BENEFITS TO THE COMMUNITY.</p>	

Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
0033	0033/01	Mr Tim Hambly Environment Agency	Yes	Yes		We also consider that it is sound, subject to the following comments:	4.63	We would ask that the Environment Agency should be mentioned here.	
0033	0033/02	Mr Tim Hambly Environment Agency	Yes	Yes		We also consider that it is sound, subject to the following comments:	5.23	This paragraph mentions surface water run-off and sustainable drainage (SUDs) etc. This needs to be updated because from 16 April 2015, we no longer deal with surface water or sustainable drainage relating to new planning applications. This is now led by and reviewed in planning by the Lead Local Flood Authority. If there is an existing planning application on which we have previously made a comment regarding surface water drainage, then we will still provide a response.	
0033	0033/03	Mr Tim Hambly Environment Agency	Yes	Yes		We also consider that it is sound, subject to the following comments:	5.118	There is a typing error in the second sentence of the paragraph which I have underlined: ‘To safeguard[ed] environmental quality and the health and amenity of the National Park’s residents, sewerage capacity and sewage disposal (including the process of disposal) must be appropriately managed’.	

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0033	0033/04	Mr Tim Hambly Environment Agency	Yes	Yes		We also consider that it is sound, subject to the following comments:	Page 307	In the table on this page, the proposed Local Plan Monitoring Indicator for policies CC-S7, CC-D2 and CC-D5 is “Length and % length of monitored rivers achieving 'good' or 'high' ecological status (under the Water Framework Directive).” We do not consider that this could be monitored in this way. Our understanding of the Water Framework Directive is that it does not break rivers down into lengths for the purposes of assessment, but will instead provide an overall assessment for a waterbody.	A suggest re-wording would read “% of monitored rivers achieving ‘good’ or ‘high’ overall waterbody status (under the Water Framework Directive)”.
0034	0034/01	Mr John Barton	Yes	Yes	Yes		RT-D13 - Safeguarding Land Along Former Railways	I fully support this policy to safeguard existing heritage features and to enable potential future reinstatement of the Lynton & Barnstaple Railway under RT-S2	
0034	0034/02	Mr John Barton	Yes	Yes	Yes		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	I fully support this policy to enable the full reinstatement of the Lynton and Barnstaple Railway because of the proven positive heritage, economic and environmental benefits such an enterprise can deliver whilst also providing sustainable access to some of the most beautiful countryside in the country. The North York Moors Railway, The Ffestiniog Railway and the Welsh Highland Railway are all excellent long standing examples of re-instated railways operating within National Parks which now are major contributors to their communities and environments.	

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0035	0035/01	Susan Davidson Marine Management Organisation	Not Stated	Not Stated	Not Stated		Whole Plan	<p>Work has not yet commenced on the South West Plans but will do so in the near future, with the Exmoor National Park falling into this plan area. Until such time as a marine plan is in place for the South West Plan Areas we advise you to refer to the Marine Policy Statement (MPS) for guidance on any planning/management activity that includes the marine environment. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the UK Marine Policy Statement unless relevant considerations indicate otherwise. Statutory agencies are also expected to provide any advice in accordance with the relevant marine plan or MPS.</p> <p>Marine planning will complement and support existing measures including site-specific objectives and management plans. For reference, the East marine plans provide an example of how marine plans may relate to the South West Plan Areas (East Inshore and Offshore Marine Plans), however these relationships will continue to develop as the marine planning process and associated evidence matures.</p>	

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0036	0036/01	Mr Duncan Lorimer	Yes	Yes	Yes		8 section 8.98		
0037	0037/01	Mr Francis Smith	Yes	Yes	Yes		8.98	I am totally in favour of the reinstatement of the Lynton and Barnstaple Railway.	

0038	0038/01	Mr Derek Montague	Not Stated	Not Stated	Not Stated		<p>RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY</p>	<p>Apart for being a member of the Lynton and Barnstaple Railway, I have been an active member of the Swanage Railway for over 30 years. During that time, I have seen it grow from operating one steam locomotive with two carriages on one mile of track to what it is today, operating up to seventeen trains per day on six miles of track between Swanage and Norden.</p> <p>The benefits which this development has brought to the Purbeck area are, in my opinion, the same as the potential benefits to North Devon and the Exmoor area and can be summarised as follows:</p> <ol style="list-style-type: none"> <li>1. Both railways are situated in Areas of Outstanding Natural Beauty which people want to visit and enjoy. The Swanage Railway provides a park and ride facility of over 600 spaces adjacent to its station at Norden which significantly reduces pressure on car parking spaces in Corfe Castle and Swanage. The Lynton and Barnstaple Railway would be able to provide the same benefit to visitors wishing to enjoy Exmoor.</li> <li>2. The Swanage Railway is a significant tourist attraction in itself, having been rebuilt in the manner of the Southern Railway in the 1950s. The L&amp;B was the only narrow-gauge railway owned by one of the 'big four' railways companies (the 'Southern') and is therefore unique amongst narrow gauge railways in this country, and it too would become an even greater attraction.</li> <li>3. The Purbeck area gains considerable economic benefit from the Swanage Railway as it is visited by over 200,000 each year. In addition, the Swanage Railway provides full-time and part-time employment as well as many volunteering opportunities. I am sure that the re-opening of</li> </ol>	
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								the Lynton and Barnstaple Railway would bring similar benefits to the North Devon area.	

0039	0039/01	Mr Nick Dodson	Yes	Yes	Yes		Section 8 RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	<p>In support of proposals – Chapter 8 I write in support of the Exmoor Park Consultation document and in particular the sections that relate to matters featured in Chapter 8 and items within RT-S2.</p> <p>In appreciation of a lost piece of our heritage, here is an opportunity to reinstate a rail line that will provide opportunities ....</p> <p>1. Environmentally, reinstatement would allow visitors to enjoy the National Park from a unique vantage point. Leaving their motor transport out of the equation. The reinstatement of the railway provides scope for the transit of visitors in numbers through the Park. As such comparisons with the successful reinstated Welsh Highland Railway in Snowdonia should be avoided. There is every reason for that model to be followed successfully here, with reinstatement of the L&amp;B line. A bonus to those in search of Access for All (section 9).</p> <p>2. This would also be a “recreational development” that would lead to the attraction of more tourists to the National Park with resultant further employment within the rural community and thus sustainability of community life and lifestyle.</p> <p>In supporting reinstatement of the railway, the inspecting Officer should consider that within the report there are golden opportunities to preserve and create, to conserve and appreciate.</p>	
0040	0040/01	Mr Philip Lane	Yes	Yes	Yes		8 8.98-9.0	Having read this plan I thoroughly endorse the proposals as laid out, and specifically wish to endorse the proposal to reinstate the Lynton to Barnstaple Railway, pp184 8.98-9.00. Our family	

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								<p>have been members for many years and are impressed with the quality and authenticity with which all restoration has been carried out. Attention to detail, use of local materials, careful and impressive restoration of rolling stock, and a commendable approach of consolidation prior to progress, assures that each and every mile will be of enormous visual and economic value to the Exmoor National Park. It is also of great appeal to the younger generation and makes another attraction to the usual beaches and adventure parks. Great Britain is almost unique in the western world in its love of railways, and desire to retain its history. This is a beautiful part of England where scenery, atmosphere and history are the main assets. A similar scheme to reinstate the Welsh Highland Railway through National Park is now acclaimed as a huge success by everyone. Having been involved for many years through aerial photography of the route, and met the committed and hard-working volunteers, I am certain that the Trust will ensure that the return of this picturesque country railway line will be done sympathetically, and will bring huge benefits to all the tourist dependent concerns, to both the immediate area, and the larger Exmoor towns and villages.</p>	

0041	0041/01	Mr William Grob	Not Stated	No	No		8.98, 8.103 RT-D13 - Safeguarding Land Along Former Railways	<p>2. RT-D12, paras 8.98; 8.103</p> <p>4. Reinstatement of the Lynton and Barnstaple Railway</p> <p>I agree that former railways are important heritage assets and that rail transport and haulage could be more sustainable and environmentally friendly. The aspirations of the Lynton and Barnstaple Railway Trust are speculative and do not stand up to business questioning. Their 4 phase plan is unsound and not deliverable; as a 2 phase plan it is not justifiable or desirable.</p> <p>The extension planned here does not form any sort of transport network, as it goes from a car park several miles from the nearest destination to another car park 10+ miles from Barnstaple. And has no hope of ever joining the 2 destinations of Lynton to Barnstaple without the use of a BUS. It is NOT a railway, it is a tourist ride on a NARROW GUAGE line, with carriages made to resemble the historic ones, it has little heritage authenticity. It could not replicate the construction of the line and meet health and safety requirements.</p> <p>The line is parallel to the A39 road and offers no better view and cannot run for more than a few seasonal weeks p.a. An improved bus service for locals and tourists would be of far greater benefit. It does not justify the grotesque expense required for reinstatement, with public and gifted money, when our primary high speed networks, rail, road and broadband are in need of major improvements.</p> <p>Historically it was documented to be uncomfortable, unsafe, there were derailments due to wet leaves, wind and rain and the steep</p>	<p>Remove: “Reinstatement of Lynton &amp; Barnstaple Railway” - As this is a tourist ride for recreation and is not a transport network. It is not a well-conceived tourist initiative. The plan is not deliverable and is not financially viable or sustainable. Its aspirations are speculative and other local comparisons do not justify the numbers and proposal that “the Trust puts forward in its proposal”. It is a delusional waste of money which they have not yet raised through the public.</p> <p>Cut: Paragraph 8.103 – Short term speculative, unsupported financially with no business sense for tourism or deliverability. It has not addressed businesses and landowners beyond Blackmore Gate. I do not think it has a viable right to create new rights of way over privately owned farmland and gardens and homes for an expensive novelty ride.</p>
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								<p>climb and tight bends filled passengers with fear! It failed twice as a viable network. Part of Exmoor history but not an effective form of transport or use of money.</p> <p>The plan has not addressed landowners appropriately and has underestimated the geological restraints and difficulties whilst playing down the terrible impact on wildlife in the areas which require significant structural build; and the access required.</p> <p>Parracombe does not have the infrastructure or services to support a significant tourist attraction, nor does it have good enough road access and parking.</p> <p>The position of the line makes the land between it and the A39 difficult to farm and the land between it and the river unfarmable.</p> <p>I do not think this highly speculative proposals improves and adds access and enjoyment to visitors and locals; it would not enhance the area and risks alienating more from the area than it could possibly attract. Improvements to the A39 would be preferable effective and deliverable for a justifiable need and cost.</p>	

0042	0042/01	Miss Ella Hunt	No	No	No		<p>8.98, 8.103 RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY</p>	<p>2. RT-D12, paras 8.98; 8.103 4. Reinstatement of the Lynton and Barnstaple Railway</p> <p>I agree that former railways are important heritage assets and that rail transport and haulage could be more sustainable and environmentally friendly with improved infrastructure.</p> <p>The aspirations of the Lynton and Barnstaple Railway Trust are speculative and do not stand up to business questioning. Their 4 phase plan is unsound and not deliverable as either a transport network, or as a tourist attraction. As a 2 phase plan it is not justifiable or desirable to locals or landowners. Neither the 4 phase plan nor the 2 phase plan could operate out of season, or in bad weather conditions (this was a historical oversight in practice, building and expense).</p> <p>The extension planned here, requiring compulsory purchase of farmland, and its CHANGE OF USE; would not form any sort of transport network, as it goes from a car park several miles from the nearest destination to another car park 10+ miles from Barnstaple. And has no hope of ever joining the 2 destinations of Lynton to Barnstaple without the use of a BUS. It is NOT a railway, so cannot justify taking away the livelihoods and continuum of farmers and landowners; it is a “recreation” tourist ride on a NARROW GAUGE LINE, with carriages made to resemble historic ones, it has little heritage authenticity. It could not replicate the construction of the line and meet health and safety requirements.</p> <p>The weather and terrain does not favour narrow gauge.</p>	<p>RT-S2: Change “Reinstatement of the LBR” to “preserving the historic track bed”. As with the local Hollywell Castle.</p> <p>1.c) i With owners cooperation or approval. Farmers may want to develop barns for their own family use and future business plans. There has been no cooperation/consultation to take over sheds, stone barns and access, let alone development ground works sites.</p> <p>1.c) ii – Where purchased with owner approval/consultation</p> <p>1.c) iii – New build on land purchased, where access is agreed – not taken out of private ownership for railway workers who have not grown up in the area. When there are many homes on the market available to purchase – currently devalued by the LBR proposal.</p> <p>1.c) iv – “buildings suitable for re-use” and “change of use”.</p> <p>1.d) This statement contradicts current building recommendations “building should complement the character of Exmoor NOT the character of the original railway – which was very short-lived and temporary.</p> <p>1.f) The construction of</p>
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							<p>The line is parallel to the A39 road and offers no better view and cannot run for more than a few seasonal weeks p.a.</p> <p>An improved bus service for locals and tourists would be of far greater benefit.</p> <p>It does not justify the grotesque expense required for reinstatement, with public and gifted money, when our primary high speed networks, rail, road and broadband are in need of major improvements.</p> <p>Historically it was documented to be uncomfortable, unsafe; there were derailments due to wet leaves, wind and rain, and the steep climb and tight bends filled passengers with fear! It failed twice as a viable network. Part of Exmoor history, but not an effective form of transport, or use of money for the future.</p> <p>The plan has not addressed landowners appropriately.</p> <p>It has underestimated the geological restraints and difficulties whilst playing down the terrible impact on the wildlife, and the significant ground works and structural build; and the access required as well as the acquisition of our farm buildings.</p> <p>Parracombe does not have the infrastructure or services to support a significant tourist attraction, without a complete change of character, nor does it have good enough road access and parking.</p> <p>The position of the line makes the land between it and the A39 difficult to farm and the land between it and the river unfarmable.</p> <p>It is not a positively prepared tourist initiative. It would have a destructive impact on the land and wildlife and upset the tranquillity for residents.</p> <p>I do not think this highly speculative proposal improves or adds access and enjoyment to visitors</p>	<p>Parracombe bridge cannot meet sensitive construction methods or preserve wildlife habitats.</p> <p>1.g) I do not like the suggestion here that the line become a public right of way as it is largely on privately owned land – not subject to footpaths or bridleways. This is because the route was historically a compromise and not placed in the most geologically suitable location, as it was opposed by landowners for good reason.</p> <p>The footpath and bridleway networks in the area are sound and logical and make the most of direct access to locations.</p> <p>They match the ancient historical access that is described throughout ‘Lorna Doone’ whose author lived here in Parracombe.</p> <p>1.h) There is no parking provision in Churchtown – Parracombe; which is accessed only by a bridleway and flanked by church ground, protected by a covenant and privately owned land. There is a small car park on Church Lane, which has inappropriate access to Parracombe Holt, and 1 in 4 hill on single lane passed the village school.</p> <p>There has been no</p>
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								and locals; it would not enhance the area and risks alienating more from the area than it could possibly attract. Improvements to the A39 would be preferable, effective and deliverable for a justifiable need and cost.	consideration or consultation within the LBR plans for access and parking. Or for consideration of the Preservation of St Petrocks ancient church and the privately owned spring water in Churchtown. The aspiration has been based on assumption and that requires a complete rebuild of the area, changing it completely, without the cooperation of the locals who have lived here for generations. I am third generation in Parracombe and most of the railway enthusiasts do not even live here or have moved to pursue their recreation in the past 4 years.



0043	0043/01	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	<p>I am pleased to provide a schedule of comments to the Publication draft Exmoor National Park local plan which is currently out for consultation. North Devon Council considered the plan at their Executive meeting on 14 July 2015, where the schedule of comments was agreed.</p> <p>Overall the draft Local Plan is considered to be well written and is supported. There are no objections to the soundness or legal compliance of the plan and there has been extensive cooperation between the NPA and North Devon Council on a range of cross-boundary issues which have been recognised and addressed adequately through the Local Plan.</p>	GP1 - GENERAL POLICY: NATIONAL PARK PURPOSES AND SUSTAINABLE DEVELOPMENT	Support	
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						The main issues raised relate to clarifying the wording of some policies to minimise opportunities for misunderstanding and inconsistent interpretation.			
0043	0043/02	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	Table 3.1 Settlement Hierarchy	Support – the proposed settlement hierarchy is supported.	
0043	0043/03	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	GP3 - GENERAL POLICY: SPATIAL STRATEGY	Support – a criteria based approach to development, rather than settlement boundaries, is supported to reduce ‘cramming’ within a boundary and by ensuring development is proportionate to the size of each settlement, and appropriate for its landscape character and settlement form.	
0043	0043/04	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	GP4 - GENERAL POLICY: THE EFFICIENT USE OF LAND AND BUILDINGS	Support – reuse of previously developed land and its efficient use is supported, whilst protecting the best and most versatile agricultural land.	

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0043	0043/05	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	CE-S1 - LANDSCAPE CHARACTER	Support – NDC will recognise cross-boundary opportunities to conserve and enhance the landscape and seascape setting of the National Park.	
0043	0043/06	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	CE-D1 - Protecting Exmoor's Landscapes and Seascapes	Support – protection of the natural beauty and tranquillity of Exmoor's landscapes and seascapes are supported.	
0043	0043/07	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	CE-S2 - PROTECTING EXMOOR'S DARK NIGHT SKY	Support – recognition and protection of the dark sky reserve and the proposed criteria for achieving it are welcomed. The North Devon and Torridge Local Plan will resist any light spillage from outside the national park which would harm the reserve's integrity.	

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0043	0043/07	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	4.44-4.50	Conditional Support – this section on ‘Internationally and Nationally Designated Biodiversity Assets on Exmoor’ should include reference to the Transition Area of the North Devon Biosphere Reserve designated by UNESCO in 2002, the first new style Biosphere Reserve in England, which covers the western part of the park. It is mentioned elsewhere (paragraph 4.76) under green infrastructure. The spatial implications of the Biosphere Reserve are considered to complement the Local Plan’s wider aims and objectives including: delivery of green infrastructure networks, promoting ecosystem services through an integrated landscape-scale approach, effective water management, local food production and as a test-bed for sustainable development showcase living sustainably within areas of high environmental quality.	
0043	0043/08	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	CE-S3 - BIODIVERSITY AND GREEN INFRASTRUCTURE	Support – protection and enhancement of biodiversity assets is supported and recognition of cross-boundary green infrastructure networks to help support ecosystem services is welcomed.	
0043	0043/10	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	CE-D2 - Green Infrastructure Provision	Support – strengthening connectivity and resilience of ecological networks and opportunities to access open space and enjoyment of the national park are supported. The national trails and long distance footpaths crossing the park are referenced in paragraph 4.81.	

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0043	0043/11	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	CE-S4 - CULTURAL HERITAGE AND HISTORIC ENVIRONMENT	Support – inclusion of conservation for locally important non-designated heritage assets is supported, together with protection of their settings. Design to enhance local distinctiveness of settlements’ historic character is supported.	
0043	0043/12	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	CE-D3 - Conserving Heritage Assets	Support – inclusion of conservation for locally important non-designated heritage assets is supported, together with protection of their settings. Design to enhance local distinctiveness of settlements’ historic character is supported.	
0043	0043/13	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	CE-S5 - PRINCIPLES FOR THE CONVERSION OR STRUCTURAL ALTERATION OF EXISTING BUILDINGS	Conditional Support – the listed requirements are supported but conversion of buildings should refer to sustainable locational criteria with a requirement for any such conversion to be in an accessible location consistent with the objectives of the NPPF seeking to reduce the need to travel and promote sustainable transport choices. Criterion 3(b) requiring a conversion of any non-traditional building to result in an environmental and visual enhancement of the building and its setting is supported.	
0043	0043/14	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	CE-S6 - DESIGN & SUSTAINABLE CONSTRUCTION PRINCIPLES	Support – the listed design principles and sustainable construction principles are supported, including adequate provision for storage of recycling waste.	

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0043	0043/15	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	CE-S7 - SMALL SCALE WORKING OR RE-WORKING FOR BUILDING AND ROOFING STONE	Support – the small scale provision of local building stone to maintain and enhance the character of settlements, built heritage and landscape character are supported. The restrictions on supply, where similar stone cannot be sourced sustainably from elsewhere, or where quarrying would harm local amenities, health or the environment, are supported.	
0043	0043/16	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	CE-S8 - MINERALS SAFEGUARDING AREAS	Objection – safeguarding mineral reserves from non-mineral development so as not to compromise future extraction of local building stone is supported in principle.	Map 4.3 indicates the broad location for mineral safeguarding area, but the extent of such safeguarded areas needs to be shown more clearly on the relevant Policies Map for this policy to be effective for development management purposes.
0043	0043/17	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	5.10 - 5.11	Support for land management techniques that utilise ecosystem services to slow down and reduce runoff rates, such as controlling headwater drainage, increasing flood storage and woodland planting. It is important for this approach to be implemented on a catchment-wide basis through cooperation between Local Authorities.	

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0043	0043/18	Mr Andrew Austen North Devon Council	Yes	Yes	Yes		CC-S1 - CLIMATE CHANGE MITIGATION AND ADAPTATION	Support – reducing demand for energy and water and supporting carbon sequestration and storage are supported. Land management and working with natural processes to reduce risk of flooding and avoiding development in areas at risk of flooding across river catchments are supported.	
0043	0043/19	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	CC-D1 - Flood Risk	Conditional Support – the sequential approach to minimise flood risk is supported. It is unclear whether Criteria 1(a) to 1(e) are all required or whether any one of them is required. Amend accordingly with either ‘and’ or ‘or’ after criterion (d).	
0043	0043/20	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	CC-S2 - COASTAL DEVELOPMENT	Support – conserving the undeveloped character of the coast and avoiding future risks from coastal change is supported.	
0043	0043/21	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	CC-S5 - LOW CARBON AND RENEWABLE ENERGY DEVELOPMENT	Conditional Support – Proposed criteria to make potential impacts of small-scale renewable energy schemes acceptable are supported. However, a maximum height (defined as 20 metres to rotor tip) may be unnecessary if it can satisfy all the other criteria including no unacceptable landscape impact. References to a maximum height would be more appropriate in the supporting text (paragraph 5.96 & 5.97) rather than in criterion 1(a) of Policy CC-D3.	

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0043	0043/22	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	CC-D3 - Small-Scale Wind Turbines	Conditional Support – Proposed criteria to make potential impacts of small-scale renewable energy schemes acceptable are supported. However, a maximum height (defined as 20 metres to rotor tip) may be unnecessary if it can satisfy all the other criteria including no unacceptable landscape impact. References to a maximum height would be more appropriate in the supporting text (paragraph 5.96 & 5.97) rather than in criterion 1(a) of Policy CC-D3.	
0043	0043/23	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	CC-S6 - WASTE MANAGEMENT	Support – the waste hierarchy of minimising waste then managing and reusing residual waste onsite where appropriate is supported. Opportunities for small scale waste management facilities to meet needs of individual communities is supported.	
0043	0043/24	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	CC-S7 - POLLUTION	Support – avoiding pollution of air, land, soil, light, noise then minimising residual pollution is supported.	
0043	0043/25	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	6.29	Support – NDC can confirm that the housing needs arising from the North Devon parts of the National Park (205 homes) will be met within North Devon district outside the National Park, located close to and accessible to the National Park's boundaries.	



Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
0043	0043/26	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	HC-S1 - HOUSING	Support – the principle of affordable housing with local occupancy restrictions and the identified exceptions is supported. The approach for any open market housing to be only as a principal residence within identified local centres and villages and through conversion/vacant building credit is supported as appropriate for a national park.	
0043	0043/27	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	HC-S1 - HOUSING	Objection – the meaning of criterion 1(b) is unclear. Clarify whether it means either D7 or D8, (in either case with D9); or D8 and D9 together (as an alternative to D7). Similar clarification of wording is required with D10 in lieu of D9.	
0043	0043/28	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	HC-S2 - A BALANCED LOCAL HOUSING STOCK	Conditional Support – the principle of the policy is supported but it is unclear whether Criteria 1(a) to 1(c) are all required or whether only one of them is required. Amend accordingly with either ‘and’ or ‘or’ after criterion (b).	
0043	0043/29	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	6.83 -6.84 HC-S3 - LOCAL OCCUPANCY CRITERIA	Conditional Support – the cascade approach is supported but clarification is required as to what will trigger there being no local people meeting criteria 1. For how long does a property need to be marketed or advertised to demonstrate no qualifying need? Would an identified future need qualify? This could be clarified in the supporting text or proposed future Exmoor Housing SPD.	

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0043	0043/30	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	HC-S4 - PRINCIPAL RESIDENCE HOUSING	Conditional Support – market housing from conversions, or required to enable the delivery of affordable housing as being ‘principal residence’ housing to restrict its use for second and holiday homes, is supported. Policies HC-D1 (3e) and H2-D2 (2a ii) indicate the minimum market housing required to make it viable, which is an approach supported. It may be helpful to cross reference or clarify this in the supporting text (paragraph 6.87).	
0043	0043/31	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	HC-D1 - Conversions to Dwellings in Settlements	Support	
0043	0043/32	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	HC-D2 - New Build Dwellings in Settlements	Conditional Support – does ‘named settlements’ refer to those identified in the settlement hierarchy (table 3.1 and GP3) as all settlements have a name? It should do to support sustainable patterns of development. Clarification would be assisted by defining the term ‘named settlements’ in the Glossary.	
0043	0043/33	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	HC-S6 - LOCAL COMMERCIAL SERVICES AND COMMUNITY FACILITIES	Support – provision of new or extended local commercial services and community facilities will help sustain these communities.	

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0043	0043/34	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	SE-S1 - A SUSTAINABLE EXMOOR ECONOMY	Support – strengthening, enhancing and diversifying the local economy, business and employment development on Exmoor are supported.	
0043	0043/35	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	SE-S2 - BUSINESS DEVELOPMENT IN SETTLEMENTS	Conditional Support – new and extended business are supported within the local service centres and villages, if that is where is meant by ‘named settlements’ (see comments to HC-D2).	
0043	0043/36	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	SE-S2 - BUSINESS DEVELOPMENT IN SETTLEMENTS	Conditional Support – reuse of existing traditional and non-traditional buildings for business development is supported to enhance and diversify the local economy. However, the requirements of criterion 2 are unclear and need rephrasing, otherwise proposals are supported simply where no suitable buildings are available, which doesn’t appear to be the intention.	Moving ‘where no suitable buildings are available’ to the start of (b), and moving ‘where this cannot be achieved’ to the start of (c) would make the three criteria sequential and reflect the supporting text in paragraph 7.21.
0043	0043/37	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	SE-S3 - BUSINESS DEVELOPMENT IN THE OPEN COUNTRYSIDE	Conditional Support – the identified opportunities for business use of existing buildings is supported, but criterion 3(d) is unclear. It indicates a condition may be attached but without any clarification in the policy or supporting text as to when this may be the case.	Either change ‘may’ to provide clearer policy guidance or provide clarification of when it may apply in the supporting text.
0043	0043/38	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	SE-D1 - Home Based Businesses	Support – live-work units being in accordance with housing policies of the plan will help to deliver a pattern of sustainable development.	

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0043	0043/39	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	RT-S1 - RECREATION AND TOURISM	Conditional Support – the principle of delivering a high quality visitor experience is fully supported but it is unclear whether Criteria 2(a) to 2(g) are all required or whether only one of them is required.	Amend accordingly with either 'and' or 'or' after criterion (f).
0043	0043/40	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	RT-D2 - Staff Accommodation	Conditional Support – the intentions of the policy are supported but the requirements of criterion 1 are unclear and need rephrasing, otherwise proposals could be supported simply 'where this is not possible'.	Moving 'where this is not possible' to the start of (b), would make the criteria sequential and reflect the supporting text in paragraph 8.26.
0043	0043/41	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	RT-D6 - Camping Barns	Objection – the meaning of criterion 2(b) is unclear. Clarify whether it means either (a) or (b), (in either case with (c)); or (b) and (c) together (as an alternative to (a)).	
0043	0043/42	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	RT-D13 - Safeguarding Land Along Former Railways	Support – safeguarding the route of the former Lynton and Barnstaple Railway is supported. It complements the policies in the emerging North Devon and Torridge local plan and demonstrates opportunities for cross-boundary expansion of the green infrastructure access network.	
0043	0043/43	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	Support – the reinstatement of this route complements Policy BAR16 in the emerging North Devon and Torridge local plan.	

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0043	0043/44	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	AC-S1 - SUSTAINABLE TRANSPORT	Support – encouraging sustainable modes of transport and opportunities for cross-boundary linkages for walking, cycling and horse-riding are supported.	
0043	0043/45	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	AC-S3 - TRAFFIC MANAGEMENT AND PARKING	Conditional Support – the traffic management principles are supported but the full meaning of criterion 3 is unclear.	Clarify whether it means either (a) or (b), (in either case with (c) and (d)); or (b), (c) and (d) together (as an alternative to (a)).
0043	0043/46	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	AC-S4 - ELECTRICITY AND COMMUNICATIONS NETWORKS	Support – accessibility to improved telecommunications networks is supported where the national park’s special qualities are conserved.	
0043	0043/47	Mr Andrew Austen North Devon Council	Yes	Yes	Yes		10.2	Add Mineral Safeguarding Areas (see comments to CE–S8).	
0043	0043/48	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	Inset map legend	The disclaimer should refer to the Policies Map rather than the Proposals Map.	
0043	0043/49	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	See above	ES-S2 - LYNTON AND LYNMOUTH NEIGHBOURHOOD PLAN	Support – clarification of the relative weights to be given to any policies is welcomed where there is potential conflict between this local plan and the Lyn Plan.	

0044	0044/01	Mr Michael Calder National Trust	Not Stated	Not Stated	No		<p>3 - GENERAL POLICIES 3.25 GP2 - GENERAL POLICY: MAJOR DEVELOPMENT</p>	<p>The Trust agrees with a case by case approach to determine if a proposal constitutes major development in terms of paragraph 116 of the NPPF. The national Planning Practice Guidance (PPG) makes clear that: "whether a proposed development in these designated areas should be treated as a major development, to which the policy in paragraph 116 of the Framework applies, will be a matter for the relevant decision taker, taking into account the proposal in question and the local context." [Reference ID: 8-001-20140306] However, to make the Local Plan more effective in providing consistency and in providing a practical framework within which decisions on planning applications can be made in line with the NPPF core principle (NPPF, para17), it should be made clearer in the supporting text to the local plan, under paragraph 3.26, that in coming to a decision whether a proposed development should be treated as major development, consideration should be given to the following: - The local context. This should include taking into account the nature and sensitivity of the site, including the physical surroundings and the size of any local settlement, as well as the historical context of change locally, in terms of the level and scale of past development and the degree of change over time. - The potential to harm the natural beauty and special qualities of the National Park. The decision should not be on the basis of likely impact after that harm is reduced through mitigation: The extent to which harm could be moderated would be considered as part of the assessment process in relation to the NPPF tests for major development as set out in paragraph 116.</p>	<p>Insert into paragraph 3.26: ... in coming to a decision whether a proposed development should be treated as a major development, consideration should be given to the following: - The local context. This should include taking into account the nature and sensitivity of the site, including the physical surroundings and the size of any local settlement, as well as the historical context of change locally, in terms of the level and scale of past development and the degree of change over time. - The potential to harm the natural beauty and special qualities of the National Park. The decision should not be on the basis of likely impact after that harm is reduced through mitigation: The extent to which harm could be moderated would be considered as part of the assessment process in relation to the NPPF tests for major development as set out in paragraph 116.</p>
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0044	0044/02	Mr Michael Calder National Trust	Not Stated	Not Stated	No		4 - CONSERVING AND ENHANCING EXMOOR 2.3; 4.15 CE-D1 - Protecting Exmoor's Landscapes and Seascapes	Objective 1, or a new additional second objective, under paragraph 2.3 should mention seascape, to establish the primary importance of this issue. The North Devon and Exmoor Seascape Character Assessment (SCA) commissioned by key local partners, including Exmoor National Park and the National Trust, and being undertaken by Land Use Consultants, should be tied into the local plan. The client brief for the SCA states that: "the longer term aspiration is to seek adoption of the Assessment as a supplementary document to Local Plans." Such an aspiration requires the Local Plan to refer to the intended supplementary document, especially as the SCA is intended to have application in decision-making, to link to LCA, and to uphold the special qualities of the coastline. The SCA should be mentioned in supporting text and in Policy CE-S1	Objective 1, or a new additional second objective, under paragraph 2.3 should mention seascape, to establish the primary importance of this issue. Policy CE-S1 should be amended and titled: Landscape and Seascape Character 2. (add to the sentence) ... and forthcoming Seascape Character Assessment (SCA)

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0044	0044/03	Mr Michael Calder National Trust	Not Stated	Not Stated	No		4 - CONSERVING AND ENHANCING EXMOOR 4.15 CE-S1 - LANDSCAPE CHARACTER	Paragraph 4.15 states that policies CE-S1 and CC-S2 "aim to ensure that development proposals retain the character of the predominately undeveloped nature of the Heritage Coast". Paragraph 5.31 states that: "To protect the undeveloped nature of the Exmoor coastline, new development should be located in named settlements." However, for the named settlements no development boundaries are drawn (Policy GP3: Spatial Strategy). In relation to potential development proposals on the edge of the named settlements it would seem reliance is placed on Policy CE-D1 (Protecting Exmoor's Landscapes and Seascapes) which requires development to "conserve the undeveloped nature of the coast", and yet that policy is not cross-referenced in paragraphs 4.15 and 5.31, or in Policy CC-S2	Cross reference policy CE-D1 in paragraphs 4.15 and 5.31 Modify policy CC-S2 as follows: Policy CC-S2 Coastal Development 2.c) is appropriate to the setting and character of the coastline and conserves the undeveloped nature of the coast (CE-S1 and CE-D1), and does ....



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0044	0044/04	Mr Michael Calder National Trust	Not Stated	Not Stated	No		4. CONSERVING AND ENHANCING EXMOOR CE-D1 - Protecting Exmoor's Landscapes and Seascapes	Paragraph 4.15 states that policies CE-S1 and CC-S2 "aim to ensure that development proposals retain the character of the predominately undeveloped nature of the Heritage Coast". Paragraph 5.31 states that: "To protect the undeveloped nature of the Exmoor coastline, new development should be located in named settlements." However, for the named settlements no development boundaries are drawn (Policy GP3: Spatial Strategy). In relation to potential development proposals on the edge of the named settlements it would seem reliance is placed on Policy CE-D1 (Protecting Exmoor's Landscapes and Seascapes) which requires development to "conserve the undeveloped nature of the coast", and yet that policy is not cross-referenced in paragraphs 4.15 and 5.31, or in Policy CC-S2	Cross reference policy CE-D1 in paragraphs 4.15 and 5.31 Modify policy CC-S2 as follows: Policy CC-S2 Coastal Development 2.c) is appropriate to the setting and character of the coastline and conserves the undeveloped nature of the coast (CE-S1 and CE-D1), and does ....

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0044	0044/05	Mr Michael Calder National Trust	Not Stated	Not Stated	No		5. RESPONDING TO CLIMATE CHANGE 5.31 CC-S2 - COASTAL DEVELOPMENT	Paragraph 4.15 states that policies CE-S1 and CC-S2 "aim to ensure that development proposals retain the character of the predominately undeveloped nature of the Heritage Coast". Paragraph 5.31 states that: "To protect the undeveloped nature of the Exmoor coastline, new development should be located in named settlements." However, for the named settlements no development boundaries are drawn (Policy GP3: Spatial Strategy). In relation to potential development proposals on the edge of the named settlements it would seem reliance is placed on Policy CE-D1 (Protecting Exmoor's Landscapes and Seascapes) which requires development to "conserve the undeveloped nature of the coast", and yet that policy is not cross-referenced in paragraphs 4.15 and 5.31, or in Policy CC-S2	Cross reference policy CE-D1 in paragraphs 4.15 and 5.31 Modify policy CC-S2 as follows: Policy CC-S2 Coastal Development 2.c) is appropriate to the setting and character of the coastline and conserves the undeveloped nature of the coast (CE-S1 and CE-D1), and does ....

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0044	0044/06	Mr Michael Calder National Trust	Not Stated	Not Stated	No		4. CONSERVING AND ENHANCING EXMOOR CE-S4 - CULTURAL HERITAGE AND HISTORIC ENVIRONMENT	To be effective, and to ensure consistency with national policy, Policy CE-S4 (para 4) should make clear that a systematic approach to the assessment of the impact of development proposals on the setting of heritage assets is required, and that this should be investigated following best practice [Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets, March 2015]	Suggested revised wording of Policy CE-S4 - To make the plan sound, the Trust suggests a revised positive policy wording, with the following added to paragraph 4: In relation to development of proposals which affect the setting of a heritage asset a systematic assessment is required following Historic England Guidance, published in March 2015; Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets, or any replacement guidance, sufficient to understand the potential impact of the proposal on the significance of the asset and contribution made by its setting. <a href="http://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/">Http://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/</a>

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0045	0045/01	Mrs Pauline Clarke	Yes	Yes	No		8. ACHIEVING ENJOYMENT FOR ALL 8.94 RT-D12 - Access Land and Rights of Way		Modify third sentence to read "ENPA will work with farmers, land owners and land managers to ...." otherwise it appears to favour large landowners whilst alienating small. Modify final sentence to read "be sought and national guidelines followed to safeguard different user groups interests and avoid conflict" - This will provide a benchmark to work from and uniformity across the network. These modifications will assist with the plan's effectiveness and deliverability by being fair to all.
0046	0046/01	Mr Paul Hickson Somerset County Council	Not Stated	Not Stated	No		4. CONSERVING AND ENHANCING EXMOOR 5.112 CE-S6 - DESIGN & SUSTAINABLE CONSTRUCTION PRINCIPLES	We suggest that the supporting text to policy CE-S6 would usefully cross-refer to paragraph 5.112 / the sub-section on C&D waste. A small point, and a short sentence/phrase would do it. The danger is that the waste audit / C&D waste considerations become more aligned with waste development issues than an everyday principle associated with sustainable construction/design. And if that occurs, the use of waste audits and opportunities for supporting recycling/recovery will diminish.	We suggest that the supporting text to policy CE-S6 would usefully cross-refer to paragraph 5.112 / the sub-section on C&D waste. A small point, and a short sentence/phrase would do it.

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0046	0046/02	Mr Paul Hickson Somerset County Council	Not Stated	Not Stated	No		4. CONSERVING AND ENHANCING EXMOOR CE-S8 - MINERALS SAFEGUARDING AREAS	The wording of the safeguarding policy could be clarified. How will ENPA handle an application where the exceptional criteria are deemed to apply?	It is suggested that the opening sentence to the policy be reviewed and amended. One way to achieve this would be to move the word "not" from before "compromise" to before "permitted".
0046	0046/03	Mr Paul Hickson Somerset County Council	Not Stated	Not Stated	No		5. RESPONDING TO CLIMATE CHANGE 5.109 CC-S6 - WASTE MANAGEMENT	Paragraph 5.109 refers to "Both Councils agree with the ENPA ..." I'm not disputing that we agree; but wonder if this might be phrased to refer to respective Devon and Somerset waste plans rather than summarising things in this way. As ENPA will recall we included a number of paragraphs on coverage of Exmoor National Park in the Somerset Waste Core Strategy (2.5 - 2.12 in particular) and our policies will clearly be used to determine relevant applications. In the same paragraph, reference is made to commercial composting and recycling plants being inappropriate. The wording in this sentence may be a little inflexible, potentially conflicting with policy CC-S6 and/or making support for welcome, small-scale/community composting initiatives more difficult. Surely these would still need to be commercially viable, even if they are not large-scale?	Change the middle sentence to something like: "The Somerset Waste Core Strategy and Devon Waste Plan articulate this relationship with Exmoor National Park, acknowledging that the provision of large scale waste facilities for disposal, processing, recovery and recycling is inappropriate on Exmoor due to the area's designation as a National Park."

0046 0046/04	Mr Paul Hickson Somerset County Council	Not Stated	Not Stated	No	<p>We suggest clarifications to paragraph 5.112 as follows:</p> <ul style="list-style-type: none"> <li>- In the middle sentence there's reference to "where re-use on site may result in a risk .... .. off site waste management or disposal will be required". Whilst this is correct, could the language be tweaked to state a preference for off site-recycling or recovery above disposal? In this way it would align more closely with the waste hierarchy that is embedded in National Planning Policy for Waste (Appendix A). Reference to the waste hierarchy would be a solution in this regard.</li> <li>- Could the final two sentences be moved to paragraph 4.159, given space for waste is mentioned in policy CE-S6? We</li> </ul>	<p>5. RESPONDING TO CLIMATE CHANGE 5.112 CC-S6 - WASTE MANAGEMENT</p>	<p>We suggest clarifications to paragraph 5.112 as follows:</p> <ul style="list-style-type: none"> <li>- In the middle sentence there's reference to "where re-use on site may result in a risk .... .. off site waste management or disposal will be required". Whilst this is correct, could the language be tweaked to state a preference for off site-recycling or recovery above disposal? In this way it would align more closely with the waste hierarchy that is embedded in National Planning Policy for Waste (Appendix A). Reference to the waste hierarchy would be a solution in this regard.</li> <li>- Could the final two sentences be moved to paragraph 4.159, given space for waste is mentioned in policy CE-S6? We suggest also an additional element to this text.</li> </ul>	<p>With regard to the final two sentences of paragraph 5.112, we welcome reference to the Somerset Waste Partnership's Developer Guidance (in the paragraph and in footnote 218). Note this also relates to access for waste collection vehicles as well as space for storage. We request that those final two sentences currently in paragraph 5.112 be amended with that in mind.</p> <p>As you may have noted, the Somerset Waste Core Strategy refers to the possibility if a Supplementary Planning Document on this topic and for your information we have begun to look at this more closely.</p>
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						suggest also an additional element to this text.			

0047	0047/01	Mr Mike Highfield Somerset County Council	Not Stated	Not Stated	Not Stated		5.151	<p>Looking back I see I responded to Tessa Saunders on 2/12/13 on the first draft and raised the following point:</p> <p>I note the statements in 6.173 (LIGHT AND NOISE POLLUTION) refer to terms of 'significant adverse impact' and 'adverse impact' and I consider some clarification of these terms may be of benefit. The Exmoor Plan currently makes no reference to the Noise Policy Statement of England 2010 and this policy and definition of similar terms has been provided at (<a href="http://planningguidance.planningportal.gov.uk/blog/guidance/noise/when-is-noise-relevant-to-planning/">http://planningguidance.planningportal.gov.uk/blog/guidance/noise/when-is-noise-relevant-to-planning/</a>). If the terminology of the NPSE is appropriate to the Exmoor Plan then it may be beneficial to clarify an intention to broaden the consideration of noise impact from residential locations to those locations associated with recreational and tourism land use. An objective that the Exmoor Plan might consider, would be to ensure development noise impacts are kept below the lowest observed adverse effect level (LOAE) in regions of valued tranquillity. This would infer by definition that 'noise can be heard, but does not cause any change in behaviour or attitude. Can slightly affect the acoustic character of the area but not such that there is a perceived change in the quality of life.' This may then help to ensure development proposals provide more distant consideration of noise impact, extended beyond residential locations and afford better planning opportunity to avoid the gradual erosion of tranquillity where this may have a greater effect on the character of an area and influence tourism. The World Health Organisations document on the Guidelines for Community Noise</p>	<p>Looking at the revised draft I would still recommend the inclusion of a reference to the Noise Policy Statement of England within Light &amp; Noise Pollution (section 5.151) as this is a significant document with respect to noise and planning that has not been superseded by the NPPF. The Noise Planning Practice Guidance would also indicate this when it states that the NPPF 'reflects the Noise Policy Statement'.</p> <p>I would also suggest revision to the statement in 5.151 that suggests 'Tranquillity [which] results from the experience of a combination of low noise and dark night sky' because tranquillity is a feature to consider at all times and is also associated with other contextually appropriate landscape features. I would suggest the statement should indicate 'night-time tranquillity' if it is this period that is of particular importance within the statement and this comment would also apply to paragraph 1.4.</p>
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								1999 could also provide further helpful wording in suggesting that existing quiet outdoor areas should be preserved by ensuring the ratio of intruding noise to natural background sound be kept low.	
0047	0047/02	Mr Mike Highfield Somerset County Council	Not Stated	Not Stated	Not Stated		1.4		I would also suggest revision to the statement in 5.151 that suggests 'Tranquillity [which] results from the experience of a combination of low noise and dark night sky' because tranquillity is a feature to consider at all times and is also associated with other contextually appropriate landscape features. I would suggest the statement should indicate 'night-time tranquillity' if it is this period that is of particular importance within the statement and this comment would also apply to paragraph 1.4.

0048	0048/01	Mr Hugh Thomas Greater Exmoor Shoots Association	Not Stated	Not Stated	Not Stated		8.73	Please note my suggested amendments to Para 8.73	<p>8.73</p> <p>Certain activities relating to the shooting of game may need planning permission. Where birds are reared and shot for sporting purposes for more than 28 days in a calendar year it is likely that planning permission is required even if the activity takes place on existing agricultural land unless the shoot has a long established use in planning terms.</p> <p>"In determining whether a use is exceptional, the tests are duration and reversion. If the agricultural use of the land is not impeded by the temporary shooting over it, and the agricultural use continues throughout the year, the permitted 28 day period will not be triggered. If the use has been in excess of 28 days, over a period of time exceeding 10 years, and has been of an exceptional scale that is not part of a mixed use of land, an established right may have been established".</p> <p>The National Park Authority will provide advice on whether planning permission is required. Proposals for [commercial] "full time professional" game shooting in the Exmoor</p>
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									context should also demonstrate that they are part of a farm diversification scheme (SE-S4 Agricultural and Forestry Development). "Natural England's consent within SSSIs should be sought under a separate application".
0049	0049/01	Mr Philip Hale South West Aggregates Working Party	Not Stated	Not Stated	Not Stated		4	SWAWP's response is only to note that the Devon and Somerset LAAs account for Exmoor NP as appropriate and that the MPA has worked with both MPAs to ensure that the needs of the NP are taken into account in their plans, that only building stone resources are specifically safeguarded but that large scale mineral working will be permitted in exceptional circumstances. It is considered that this approach is consistent with and reflects the position in the emerging Devon Minerals Plan.	

0050 0050/01	Laura Kelly National Grid	Not Stated	Not Stated	No	<p>SPECIFIC COMMENTS</p> <p>National Grid responded to the previous version of the Draft Local Plan (December 2013) and raised concerns in relation to the proposed policy wording relating to Electricity Communication Networks and Fixed Line Transmission Infrastructure, we note that these concerns have not been addressed in the Publication Draft.</p> <p>National Grid considers that the Publication Draft of the Local Plan as currently proposed is not in line with National Policy as set out in National Policy Statements (NPSs) under the Planning Act 2008, particularly NPS EN1 and EN5, and the National Planning Policy Framework (NPPF). It is National</p>	AC-S4 - ELECTRICITY AND COMMUNICATIONS NETWORKS	<p>National Grid infrastructure within the Exmoor National Park Authority. Electricity Transmission - National Grid has no electricity transmission assets within the Exmoor National Park Authority (NPA). National Grid has provided information in relation to electricity transmission assets via the following internet link:  <a href="http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/">http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/</a>                      Gas Transmission - National Grid has no high pressure gas transmission pipelines within the Exmoor NPA. National Grid has provided information in relation to the gas transmission network via the previous link.</p> <p>Electricity and Gas Distribution - Western Power Distribution owns and operates the local electricity distribution network in the Exmoor NPA, whilst Wales and West Utilities owns and operates the Gas Distribution network. Contact details can be found at <a href="http://www.energynetworks.org.uk">www.energynetworks.org.uk</a>.</p> <p>Draft Policy AC-S4 'Electricity and Communication Networks'</p> <p>Draft policy AC-S4 (point 3) states:                      "Major and nationally significant transmission infrastructure including high voltage pylon transmission lines, substations and other above ground structures from large scale offshore renewable energy schemes will be resisted (GP2 Major Development)."</p> <p>National Grid considers that the proposed policy contradicts paragraph 5.9.10 of NPS EN1, which provides that development consent for Major Infrastructure Projects may be granted within nationally designated landscapes in exceptional circumstances. Paragraph 5.9.10 of NPS EN1 is</p>	<p>Accordingly the proposed policy wording in AC-S4 conflicts with national policy in the NPSs and NPPF. National Grid therefore submits that in order for the policy to be considered 'sound' the draft policy should be amended to provide consistency with national policy.</p> <p>It should be noted that in line with our statutory obligations and the national policy context set out above, National Grid has made particular commitments in respect of National Parks and will seek to avoid major new development unless there are circumstances where a development is of national interest and no reasonable practical alternative is available.</p> <p>National Grid's Stakeholder and Community Engagement Policy (Schedule 9) provides a framework that promotes genuine and meaningful stakeholder and community engagement whilst developing and maintaining a culture that delivers this.</p>
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				<p>Grid’s view that in order for the plan to be considered ‘sound’, the draft plan requires amendment in order to provide consistency with National Policy.</p> <p>National Grid has considered the proposed policies in light of the tests of soundness set out in paragraph 182 of the NPPF. Policies AC-S4 and AC-D6 specifically fail to provide consistency with national policy. The draft plan therefore represents a departure from NPS and NPPF policy, with no clear or convincing reasoning to justify the approach taken available. In light of these issues, the draft plan is not considered to be sound.</p>		<p>repeated below:  “Nevertheless, the IPC may grant development consent in these areas in exceptional circumstances. The development should be demonstrated to be in the public interest and consideration of such applications should include an assessment of:</p> <ul style="list-style-type: none"> <li>• the need for the development, including in terms of national considerations, and the impact of consenting or not consenting it upon the local economy;</li> <li>• the cost of, and scope for, developing elsewhere outside the designated area or meeting the need for it in some other way, taking account of the policy on alternatives set out in Section 4.4; and</li> <li>• any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”</li> </ul> <p>This policy position and the requirement to demonstrate exceptional circumstances is also reflected in paragraph 116 of the NPPF which echoes the NPS policy.</p>	
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0050 0050/02	Laura Kelly National Grid	Not Stated	Not Stated	No	<p>SPECIFIC COMMENTS</p> <p>National Grid responded to the previous version of the Draft Local Plan (December 2013) and raised concerns in relation to the proposed policy wording relating to Electricity Communication Networks and Fixed Line Transmission Infrastructure, we note that these concerns have not been addressed in the Publication Draft.</p> <p>National Grid considers that the Publication Draft of the Local Plan as currently proposed is not in line with National Policy as set out in National Policy Statements (NPSs) under the Planning Act 2008, particularly NPS EN1 and EN5, and the National Planning Policy Framework (NPPF). It is National</p>	AC-D6 - Fixed Line Transmission Infrastructure	<p>National Grid is also concerned that draft policy AC-D6 is not consistent with national policy.</p> <p>National Grid is particularly concerned with the wording in AC-D6 (point 1) which states that “proposals for new transmission lines will only be permitted where they are routed underground”. National Policy regarding the planning and consenting of new overhead transmission lines is set out in the NPSs. NPS EN1 3.7.10 states: “...there is an urgent need for new electricity transmission and distribution infrastructure (and in particular for new lines of 132 kV and above) to be provided. The IPC should consider that the need for any given proposed new connection or reinforcement has been demonstrated if it represents an efficient and economical means of connecting a new generating station to the transmission or distribution network, or reinforcing the network to ensure that it is sufficiently resilient and has sufficient capacity (in the light of any performance standards set by Ofgem) to supply current or anticipated future levels of demand.”</p> <p>NPS EN1 3.7.10 continues: “in most cases, there will be more than one technological approach by which it is possible to make such a connection or reinforce the network (for example, by overhead line or underground cable) and the costs and benefits of these alternatives should be properly considered as set out in EN-5 (in particular section 2.8) before any overhead line proposal is consented.”</p> <p>Regarding undergrounding, NPS EN5 2.8.8 states: “Paragraph 3.7.10 of EN-1 sets out the need for new electricity lines of 132kV and above, including overhead lines. Although Government</p>	<p>In light of the above national policy context, policy AC-D6 as currently drafted does not align with national policy which explicitly does not lay down any general rule about when an overhead line should be considered unacceptable. National Grid therefore submits that the draft policy should be amended to be made consistent with national policy.</p>
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				<p>Grid’s view that in order for the plan to be considered ‘sound’, the draft plan requires amendment in order to provide consistency with National Policy.</p> <p>National Grid has considered the proposed policies in light of the tests of soundness set out in paragraph 182 of the NPPF. Policies AC-S4 and AC-D6 specifically fail to provide consistency with national policy. The draft plan therefore represents a departure from NPS and NPPF policy, with no clear or convincing reasoning to justify the approach taken available. In light of these issues, the draft plan is not considered to be sound.</p>	<p>expects that fulfilling this need through the development of overhead lines will often be appropriate, it recognises that there will be cases where this is not so. Where there are serious concerns about the potential adverse landscape and visual effects of a proposed overhead line, the IPC will have to balance these against other relevant factors, including the need for the proposed infrastructure, the availability and cost of alternative sites and routes and methods of installation (including undergrounding).”</p> <p>The NPS EN5 at paragraph 2.8.9 states that “The impacts and costs of both overhead and underground options vary considerably between individual projects (both in absolute and relative terms). Therefore, each project should be assessed individually on the basis of its specific circumstances and taking account of the fact that Government has not laid down any general rule about when an overhead line should be considered unacceptable. The IPC should, however only refuse consent for overhead line proposals in favour of an underground or sub-sea line if it is satisfied that the benefits from the non-overhead line alternative will clearly outweigh any extra economic, social and environmental impacts and the technical difficulties are surmountable...”</p>	
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0051	0051/01	South West HARP Planning Consortium	Not Stated	Not Stated	Not Stated		GP3 - GENERAL POLICY: SPATIAL STRATEGY	We support the changes made to this policy which makes the policy clearer.	
0051	0051/02	South West HARP Planning Consortium	Not Stated	Not Stated	Not Stated		GP5 - GENERAL POLICY: SECURING PLANNING BENEFITS - PLANNING OBLIGATIONS	We welcome the changes made to this policy as recommended by our previous representation on the Draft Local Plan in December 2013 (Reference: EB/CB M5/1003-04).	
0051	0051/03	South West HARP Planning Consortium	Not Stated	Not Stated	Not Stated		HC-S1 - HOUSING	We support the amendments to this Policy.	



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0051	0051/04	South West HARP Planning Consortium	Not Stated	Not Stated	No		6 6.26-6.31	Objectively Assessed Housing Need across North Devon Peninsula: We do however note that the Councils across the North Devon Peninsula (including North Devon, Torridge, West Somerset and the Exmoor National Park Authority) have failed to demonstrate how the Objectively Assessed Housing Need (OAHN) has been derived. The National Park Authority’s objectively assessed need is based upon a full Strategic Housing Market Assessment (SHMA) published in 2008. Subsequent “Updates” to the SHMA followed in 2012 and January 2015; with an additional Exmoor-specific update published in March 2015. The 2012 SHMA was based on outdated data, and no single document provided the evidence of the housing target. The March 2015 SHMA unfortunately does not reflect release of the 2012-based household projections from February 2015. Consequently, the last full assessment of the Councils’ OAHN was undertaken in 2008. This is clearly out of date, and represents a clear failure to positively prepare the Plan, which should be based at the outset on a full objectively assessed need.	It would be useful if the Councils within the North Devon Peninsula were to commission a further review based on this evidence which will provide better trend data. This would be in accordance with the latest PPG advice: “The examination of Local Plans is intended to ensure that up-to-date housing requirements and the deliverability of sites to meet a five year supply will have been thoroughly considered and examined prior to adoption, in a way that cannot be replicated in the course of determining individual applications and appeals” (Paragraph: 033 Reference ID: 3-033-20150327, our emphasis).

0051 0051/05	South West HARP Planning Consortium	Not Stated	Not Stated	No	<p>The assumptions and outcomes of the Viability Assessment are now four years old. It is considered these are out of date, and are contrary to Paragraph 158 of the National Planning Policy Framework, which states:</p> <p>“Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and</p>	6	<p><b>Viability</b></p> <p>The Housing Topic Paper (June 2015) makes reference to evidence produced by a Viability Study published in 2012. This study concerned residential conversions. It is considered the study referred to by the Topic Paper was the 2011 Housing Viability Assessment, it can only be assumed this was an error.</p> <p>The assumptions and outcomes of the Viability Assessment are now four years old. It is considered these are out of date, and are contrary to Paragraph 158 of the National Planning Policy Framework, which states:</p> <p>“Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals”. (Our emphasis)</p> <p>Also, one of the key issues arising from the Viability Assessment includes that “it is unlikely that 100% affordable housing schemes will be viable unless sites can be purchased for less than £100k/ha although again this is dependent on an individual sites circumstance. Another alternative would be to allow an element of private housing as an enabler to the affordable housing development”. Considering the National Park Authority’s commitment to making provision for local need affordable housing, these findings are of minor concern.</p>	<p>The recent introduction of the five-unit threshold for affordable housing in designated rural areas (including National Parks) in the Planning Practice Guidance has inevitably not been calculated within the Viability Assessment. This is an important consideration.</p>
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						economic signals". (Our emphasis)			
0051	0051/06	South West HARP Planning Consortium	Not Stated	Not Stated	Not Stated		HC-D3 - Specialist Housing for Exmoor's Communities	We support the inclusion of these policies but consider the content to be unnecessarily restrictive. Point 1.a) of HC-D3 essentially sets a sequential test on the development of specialist housing for older people, which is both impractical and unnecessary. The large older person population in the National Park is acknowledged by the NPA, which should allow flexibility to enable development by specialist providers, including Housing Associations to deliver according to local market knowledge. The local occupancy and other restrictions should suffice to control these developments.	
0051	0051/07	South West HARP Planning Consortium	Not Stated	Not Stated	Not Stated		HC-S7 - RESIDENTIAL INSTITUTIONS	We support the inclusion of these policies [refers to HC-D3 and HC-S7].	

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0052	0052/01	Anthony Meakin Lynton & Lynmouth Town Council	Not Stated	Not Stated	Not Stated		Whole Plan	<p>Lynton &amp; Lynmouth Town Council are pleased to review the plan which is comprehensive and detailed, yet a readable document. The authors are to be congratulated for such a clear uncomplicated style which made the review easier to achieve.</p> <p>In conclusion Lynton &amp; Lynmouth Town Council are supportive of the Plan and look forward to its application in partnership with the Lyn Plan for the coming years for the benefit of ENPA and importantly to retain and develop our community in Lynton and Lynmouth in the west of the Park.</p> <p>Broadly, LLTC support the plan and are pleased it acknowledges many cornerstones of the Lyn Neighbourhood Plan, adopted in 2012 [sic 2013]. Council wish the two plans continue to be linked in a positive way for the community benefit whilst preserving all that is good about the National Park.</p>	
0052	0052/02	Anthony Meakin Lynton & Lynmouth Town Council	Not Stated	Not Stated	Not Stated		HC-D3 - Specialist Housing for Exmoor's Communities	<p>Especially we welcome all aspects of the Plan which give support and encouragement to local ties, extended family heritage and support for traditional skills and hereditary behaviours [HCD3; HCD4; HCD5; HCD14]</p>	

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0052	0052/03	Anthony Meakin Lynton & Lynmouth Town Council	Not Stated	Not Stated	Not Stated		HC-D4 - Extended Family Dwellings Criteria	Especially we welcome all aspects of the Plan which give support and encouragement to local ties, extended family heritage and support for traditional skills and hereditary behaviours [HCD3; HCD4; HCD5; HCD14]	
0052	0052/04	Anthony Meakin Lynton & Lynmouth Town Council	Not Stated	Not Stated	Not Stated		HC-D5 - Custom/Self Build Local Need Housing in Rural Communities	Especially we welcome all aspects of the Plan which give support and encouragement to local ties, extended family heritage and support for traditional skills and hereditary behaviours [HCD3; HCD4; HCD5; HCD14]	
0052	0052/05	Anthony Meakin Lynton & Lynmouth Town Council	Not Stated	Not Stated	Not Stated		HC-D14 - Subdivisions of Existing Dwellings	Especially we welcome all aspects of the Plan which give support and encouragement to local ties, extended family heritage and support for traditional skills and hereditary behaviours [HCD3; HCD4; HCD5; HCD14]	
0052	0052/06	Anthony Meakin Lynton & Lynmouth Town Council	Not Stated	Not Stated	Not Stated		RT-D3 - Safeguarding Serviced Accommodation	The Plan represents Councils view regarding Local Affordable Housing Needs and necessary deconstruction of unviable serviced accommodation into principal resident dwellings. [RTD3]	
0052	0052/07	Anthony Meakin Lynton & Lynmouth Town Council	Not Stated	Not Stated	Not Stated		HC-S4 - PRINCIPAL RESIDENCE HOUSING	Council reiterate support for some market housing to avoid an unintended 'stagnation' of the community as a potential negative outcome of a rigid Principal Residence policy [HCS4].	

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0052	0052/08	Anthony Meakin Lynton & Lynmouth Town Council	Not Stated	Not Stated	Not Stated		6	There are concerns locally regarding the supply of housing which Councils believes would be worsened through selling further social housing units. Council would seek resistance from ENPA were this to be proposed.	
0052	0052/09	Anthony Meakin Lynton & Lynmouth Town Council	Not Stated	Not Stated	Not Stated		7	Further observation from the Council concerns provision of light industrial and lock-up storage facilities in Lynton itself. Consultation with our community indicates this as a prime source of frustration and disincentive to local trades persons which needs addressing as a priority.	
0052	0052/10	Anthony Meakin Lynton & Lynmouth Town Council	Not Stated	Not Stated	Not Stated		CC-S3 - PORLOCK WEIR COASTAL CHANGE MANAGEMENT AREA	Council noted CC-D2 Coastal Change Management for Porlock Weir [sic CC-S3 Porlock Weir Coastal Change Management Area] as a necessary protection of the coastal hamlet. They were surprised not to see Lynmouth mentioned in similar vein as it too will have to contend with rising sea levels and coastal erosion. Is it possible to explicitly include Lynmouth and seek CCMA status for it like Porlock Weir considering the impact of 2013/14 floods and subsequent damage to property and businesses.	
0052	0052/11	Anthony Meakin Lynton & Lynmouth Town Council	Not Stated	Not Stated	Not Stated		RT-D7 - Certificated Caravan and Touring Caravan Sites	Finally the working party noted a lack of direct reference to 'motorised homes' under the policy relating to Caravans and Mobile Homes. For the sake of completeness and to remove ambiguity could the entire spectrum of this holiday format be included in the Plan?	

0053	0053/01	Mr David Alford West Somerset Council	Not Stated	Not Stated	Not Stated		CE-S6 - DESIGN & SUSTAINABLE CONSTRUCTION PRINCIPLES	<p>With regard to the draft Local Plan I would like to make the following comments;</p> <p>1. Policy CE-S6(2) refers to 'proposals for new development should also demonstrate how they will incorporate sustainable construction methods that'...'reduce carbon emissions by improving or generating energy efficiencies including through renewable and low carbon technologies'.</p> <p>I have previously provided comments in relation to this policy and would like to add,, that it appears not clear how a developer should demonstrate this reduction in emissions other than using the Standard Assessment Procedure tool (SAP) at the design stage, now the Code for Sustainable Homes has been recommended for withdrawal (Housing Standards Review). Demonstrate implies more than literal descriptor.</p> <p>Further guidance is needed in support of this statement, which could include matters such as;</p> <ul style="list-style-type: none"> <li>* Does the design SAP as submitted with the Design and Access Statement refer to any examples of best practice? Does the Design and Access Statement predict the DER will be significantly better than the TER (if so by what percentage)?</li> <li>* Is the site close to any of the 51 viable locations for micro-hydro identified by Loughborough University?</li> <li>* Has the applicant considered communal heating scheme?</li> </ul>	
0053	0053/02	Mr David Alford West Somerset Council	Not Stated	Not Stated	Not Stated		CC-D2 - Water Conservation	<p>Policy CC-D2 (3) Water Conservation refers to 'development proposals which lead to an increase in the demand for water in locations where the existing water supply is inadequate or cannot be satisfactorily improved, or where the additional</p>	<p>Section 5.50 should be reworded, 'it is therefore important that any proposals for new development on private water supply are able to</p>

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								<p>abstraction will have an adverse effect on existing supplies'....'will not be supported'.</p> <p>Section 5.50 should be reworded.</p>	<p>demonstrate that sufficient water [supplies are] is available, and that existing water supplies and the environment are not adversely affected by the additional demand for water.'</p> <p>Further guidance is needed in support of this statement, with assistance for example from the local building control and environmental health teams. Sufficient water should be assessed principally by pressure and flow. This is not replicated in the Building Regulations (Part G) as sufficiency and reliability are not defined.</p>



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0054	0054/01	Brigadier David Godsall Winsford Parish Council	Yes	Yes	Yes		Whole Plan	On behalf of Winsford Parish Council I would like to congratulate the officers and staff of the Exmoor National Park Authority on a very comprehensive, clear and extremely helpful piece of work. Here on Exmoor we all face considerable challenges, both now and in the years ahead. This Plan, which very clearly lays out the Vision, Objectives and Strategic Priorities, will be of considerable assistance to those of us with responsibilities, at Parish level, in supporting the Communities we serve. By their very nature many of the Objectives have the potential to conflict with one another but this Local Plan will be enormously helpful in the decision making process. We were pleased to have been consulted and to have been given the opportunity to comment at different stages in the Plan's development and very grateful to note that points raised by Winsford Parish Council have been included.	

Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
0055	0055/02	Mr Richard Auger West Somerset Railway PLC	Yes	Yes	Yes		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	I am a retired Civil Engineer and Regional Director of an engineering consultancy. I am currently a volunteer Director of the West Somerset Railway PLC. I have had a lifelong interest in heritage railways and since moving to Devon 28 years ago I have often visited, originally the abandoned trackbed of the Lynton & Barnstaple Railway and now an active and expanding venture which promises to develop into one of the UKs best and most scenic heritage railways. Not only does it enhance the attraction of the area for visitors and support for local businesses but it will also provide increasing local employment and opportunities for retirees. I fully support the objectives of this policy and urge that it be adopted.	
0056	0056/01	Jacky Walters Parracombe Parish Council	Not Stated	Not Stated	Not Stated		10 Inset Map 13 Parracombe	The description of Parracombe was supported, however it was wondered why Bodley Lane was not included in the Historic Settlement Core as there are a number of listed and old properties.	
0056	0056/02	Jacky Walters Parracombe Parish Council	Not Stated	Not Stated	Not Stated		CE-D5 - Advertisements and Private Road Signs	The PC noted the adverts and signs policy but would like to point out the problems we are having with getting a village amenities sign.	
0056	0056/03	Jacky Walters Parracombe Parish Council	Not Stated	Not Stated	Not Stated		6 Achieving a Thriving Community	The PC remains concerned about the provision of affordable, local needs housing. In particular the local need criteria, identifying current local need and the ability to deliver affordable housing.	

Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
0057	0057/01	Dr Ueli Zellweger	Not Stated	Not Stated	Not Stated		4 Conserving and Enhancing Exmoor CE-S3 - BIODIVERSITY AND GREEN INFRASTRUCTURE	<p>1. Exmoor Rivers &amp; Streams are not mentioned – Why?</p> <p>Exmoor without all its magnificent rivers and streams is unthinkable; apart of all their beauties they are vital habitat and corridors for highly protected wildlife ( like otter, bats, Atlantic Salmon, European Eel etcetera ) which thrive uniquely in them or on the abutting banks and wooded slopes. Very rare botanical features are in them; within whole UK there are nowhere as many Jelly Lichen as in the River Barle ). While landscapes and seascapes are widely described and respected in this Local Plan Draft Exmoor’s precious rivers and streams are hardly mentioned ( or then I could not find it anywhere ).</p>	For providing adequate conservation over the next 20 years may I kindly ask you to get all those aspects integrated - probably best in the chapter Conservation Objectives ( p 31 following ).
0057	0057/02	Dr Ueli Zellweger	Not Stated	Not Stated	Not Stated		CE-S9 - MAJOR MINERAL EXTRACTION	<p>2. Policy CE – S9 Mineral Extraction</p> <p>Please make sure that fracking of any scale is never happening in the Park by adding adequate lines on page 79.</p>	

0058	0058/01	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated		2 Vision, Objectives and Strategic Priorities	BE supports the strategic priorities set out at 2.4 the plan. BE believes that the Exmoor National Park Authority (“ENPA”) should play an enabling role and should apply a presumption in favour of appropriate sustainable development (which BE defines as all development that demonstrably meets the needs of Exmoor’s communities and is consistent with the ENPA’s statutory purposes). BE considers that this would be consistent with the provisions of the plan at page 14 which recognises the National Park Authority duty ‘to seek to foster the economic and social wellbeing of local communities’.	BE suggests  1. that an additional subparagraph should be added after 2.4.1.iv as follows: v) Apply a presumption in favour of sustainable development and take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework, always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and secure development that improves the economic, social and environmental conditions in the area.2  Footnote 2: See Policy DMD1a of the Dartmoor National Park Development Management and Delivery Development Plan Document which was adopted by the Dartmoor National Park Authority on 5 July 2013.  2. that an additional subparagraph should be inserted after 2.4.2.iii as follows: iv) Enabling the provision of suitable permanent housing and short and long term
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Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
									<p>temporary residential accommodation for people who are employed within the National Park.<sup>3</sup></p> <p>Footnote 3: urges ENPA to recognise the strong link between the needs of business to recruit and retain staff across all levels and the need for suitable housing stock both for people who meet the “local needs” criteria and for those who do not but who are self employed or employed within the National Park and who wish to live permanently at or close to their place of work and to adopt a more flexible and enabling policy approach to address this issue.</p>

0058	0058/02	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated		Whole Plan	<p>BE considers there to be an overriding economic and social need to sustain and enhance Exmoor’s communities by encouraging the business and entrepreneurial activity that will provide the long term higher value jobs that are essential to retain the population of Exmoor. BE also considers that policies should also be encouraging of appropriate inward migration of skills and capital with a view to maximising the economic and social benefit of Exmoor’s existing resources. In particular, policies should encourage the use and re-use of existing building stock, a proportion of which is either redundant or under-used, for business and residential purposes. BE notes that that approach would be consistent with national planning policy as set out in the National Planning Policy Framework (“NPPF”) and associated Planning Practice Guidance (“PPG”).</p> <p>BE considers that in some cases the plan is unnecessarily prescriptive in its proposed policies and that by taking a prescriptive approach that seeks to restrict development rather than to enable appropriate sustainable development, the application of the policies will prevent the strategic priorities from being met. This approach is also not consistent with the NPPF and PPG. In BE’s opinion, the adoption of a prescriptive approach as opposed to an enabling principles based approach has resulted in the production of a document that is very long and detailed and accordingly difficult to follow and apply. As an aside (recognising that this will be a matter for future reference and not of immediate application) BE would refer ENPA to the Dartmoor National Park Local Plan for the period 2006 – 2026 which BE considers to be an example of best practice in terms of setting out short, principles</p>	<p>BE considers the emphasis on small scale development to be contrary to the NPPF, which supports all forms of development (other than major development in National Parks unless there is an overriding public interest) and to the stated plan objectives and recognised National Park Authority duties and suggests that the words “small scale” should be deleted on all occasions where they are used in a policy context.<sup>4</sup></p> <p>Footnote 4: For a list of the uses of “small scale” in the plan see Appendix 1.</p>
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Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
								<p>based policies that are easy to follow and apply. BE notes the emphasis that the plan places on “small scale” development. BE has run a word search on the plan and has found 90 uses of the words “small scale” on 64 pages. On 74 occasions the words “small scale” are used in a policy as opposed to a descriptive context.</p>	

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0058	0058/03	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	All submissions for changes to the plan should be taken as being required either to ensure that the policies are consistent with and capable of delivering the stated objectives and/or to ensure that policies are compliant with national planning policy and guidance. Where BE considers that all or part of a policy should be deleted from the plan it follows that the explanatory text relevant and referable to that policy should also be deleted or amended accordingly.	GP1 - GENERAL POLICY: NATIONAL PARK PURPOSES AND SUSTAINABLE DEVELOPMENT		A subparagraph should be added after GP1.3.j) to read k) enabling businesses to grow and develop to increase the employment opportunities within the National Park
0058	0058/04	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	See Business Exmoor Comment above	3.24-3.26	Paras. 3.24 – 3.26 are not in accordance with the NPPF and should be deleted. The definition of major development should be as per the NPPF.	



Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
0058	0058/05	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	See Business Exmoor Comment above	GP3 - GENERAL POLICY: SPATIAL STRATEGY	Policy GP3.3.d) as currently drafted is not in accordance with the NPPF. The words “rural land-based” should be deleted. BE notes the provisions of the NPPF as follows: local and neighbourhood plans should support the sustainable growth and expansion of all types of business and enterprise in rural areas <sup>6</sup> , both through conversion of existing buildings and well designed new buildings.  Footnote 6: BE’s emphasis "all types of business and enterprise in rural areas".	
0058	0058/06	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	See Business Exmoor Comment above	CE-S7 - SMALL SCALE WORKING OR RE- WORKING FOR BUILDING AND ROOFING STONE	There should be no test whether “local” materials can be sourced from outside the National Park. That would be inconsistent with a policy that should enable the use of locally sourced materials from as close to the location where they are to be used as is reasonably possible.	Policy CE-S7.1.f) should be deleted.
0058	0058/07	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	See Business Exmoor Comment above	CC-S5 - LOW CARBON AND RENEWABLE ENERGY DEVELOPMENT		Policy CC-S5. 2. should be deleted. The policies at 1. (with the deletion of the words “small scale”) provide sufficient protection.

Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
0058	0058/08	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	See Business Exmoor Comment above	6.47	BE considers that the prescription of floorspace limits is unnecessarily restrictive and will prevent much needed local affordable housing from being provided in cases where for reasons of individual circumstances (i.e. where a family house is required or where the occupier requires an element of “live-work” provision such as home office, storage for equipment, accommodation for working dogs or pets or additional boot/coat storage and washing facilities appropriate to a rural outdoor job) the 90 sqm threshold is not reasonably practicable. The adoption of the threshold will therefore prevent the policy objective of providing for a suitable mix of sizes and types of housing within the National Park that meets the needs of individuals and the community. See also comments at footnote 3. Other references to the 90 sqm threshold (or other thresholds) should also be deleted e.g. at paras. 6.62, 6.63 and 6.64.	Para. 6.47.(ii). The words “Individual privately or owner occupied dwellings should therefore have a net floorspace of 90 square metres (sqm) or less unless it is housing controlled through a Registered Provider (Policy HC-S2: A Balanced Local Housing Stock)” should be deleted.

Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
0058	0058/09	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	See Business Exmoor Comment above	HC-S1 - HOUSING	The policy should allow for housing land to be allocated in circumstances where it can be demonstrated that additional housing would enable existing settlements to remain viable (for example by increasing the demand for local services such as shops/schools/pubs etc.) where otherwise they would not and/or where there is a demonstrable need for additional housing to meet employment demands from local businesses.	Policy HC-S1. Paragraphs 2 and 3 should be deleted.
0058	0058/10	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	See Business Exmoor Comment above	HC-S2 - A BALANCED LOCAL HOUSING STOCK		Policy HC-S2. The words “For private owner occupied local need dwellings, specialist housing, extended family dwellings and “succession farm dwellings”, the net floorspace will be 90 square metres or less” should be deleted. Para 1. c) should be deleted.
0058	0058/11	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	See Business Exmoor Comment above	HC-S3 - LOCAL OCCUPANCY CRITERIA	Policy HC-S3. The 10 year residency requirement is unnecessarily restrictive and the policy should allow it to be reduced or waived based on the individual circumstances of the applicant.	For example, the policy should allow a person moving into the area to take up permanent employment or to own and operate an established business to qualify.

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0058	0058/12	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	See Business Exmoor Comment above	6.87 HC-S4 - PRINCIPAL RESIDENCE HOUSING		Para. 6.87 and Policy HC-S4 should be deleted. It is contrary to the NPPF and PPG which supports change of use of non residential buildings to market housing. The use of “principal residence” conditions should be covered within other housing policies.
0058	0058/13	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	See Business Exmoor Comment above	HC-D1 - Conversions to Dwellings in Settlements		Policy HC-D1. Paragraphs 1. c) through to the end of 8. Should be deleted because they are not consistent with NPPG and PPG which supports the change of use of non-residential buildings to dwellings.
0058	0058/14	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	See Business Exmoor Comment above	HC-D2 - New Build Dwellings in Settlements		Policy HC-D2. Amend para 1 b) to read “it will meet a local need, including an employment need from local businesses, and that need can not be met.....” Delete “of up to 90 sqm floorspace” from para 4.
0058	0058/15	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	See Business Exmoor Comment above	HC-D4 - Extended Family Dwellings Criteria		Policy HC-D4 should be deleted because it is not consistent with the NPPF and PPG which supports the change of use of non-residential buildings to dwellings.

Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
0058	0058/16	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	See Business Exmoor Comment above	HC-D7 - Conversions to Dwellings in the Open Countryside	<p>The definition of “rural exception sites” within the NPPF does not apply to existing buildings in the open countryside and the policy that permits residential development involving the re-use of redundant or disused buildings applies.7</p> <p>Footnote 7: Although Use Class Q of Part 3 of Schedule 2 of the General Permitted Development Order does not apply within National Parks all other policies and guidance which support the change of use of non residential buildings to dwellings continue to apply and ENPA plan policies must be consistent with those national policies and guidance – see NPPF para. 55 and the PPG on planning obligations for small scale developers.</p>	Policy HC-D7 should be deleted or significantly amended to make it consistent with the NPPF and PPG which supports the change of use of non-residential buildings to dwellings.
0058	0058/17	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	See Business Exmoor Comment above	HC-D9 - Rural Workers		Policy HC-D9. Delete para 1. b) which does not accord with the NPPF which only applies the essential need test. Delete the reference to 90 sqm at para d).
0058	0058/18	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	See Business Exmoor Comment above	HC-D10 - Succession Farming – Second Dwellings on Established Farms	Policy HC-D10. BE supports this policy but not the application of the 90 sqm threshold which is unduly restrictive.	The size of the dwelling should be commensurate with the demonstrable need of the applicant and the scale of the farming business.

Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
0058	0058/19	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	See Business Exmoor Comment above	HC-D15 - Residential Extensions		Policy HC-D15. Para 1.c). Delete from “and in any case...” to the end of the sub para. The 35% restriction is unnecessary and all applications should be judged on their merits. Para 2 c). Delete from “or immune from ....” to end of sub para. Dwellings that are immune from enforcement or have the benefit of a CLUD are authorised and should be treated in the same way as any other authorised dwellings.

0058	0058/20	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	See Business Exmoor Comment above	SE-S1 - A SUSTAINABLE EXMOOR ECONOMY	<p>BE supports Policy SE-S1. BE notes the provisions of Para 28 of the NPPF as follows:                      Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should:</p> <ul style="list-style-type: none"> <li>● support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings;</li> <li>● promote the development and diversification of agricultural and other land-based rural businesses;</li> <li>● support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres; and</li> <li>● promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.<sup>8</sup></li> </ul> <p>Footnote 8: NPPF page 9.</p>	
0058	0058/21	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	See Business Exmoor Comment above	SE-S2 - BUSINESS DEVELOPMENT IN SETTLEMENTS	<p>Policy SE-S2 should not differentiate between traditional and non traditional buildings as that is inconsistent with the NPPF quoted above [para 28 NPPF].</p>	The policy should be amended accordingly and the reference to “small scale” should be deleted.

Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
0058	0058/22	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	See Business Exmoor Comment above	SE-S3 - BUSINESS DEVELOPMENT IN THE OPEN COUNTRYSIDE	Policy SE-S3 is inconsistent with the NPFF. It should not differentiate between traditional and non traditional buildings and there should be no requirement for buildings to be redundant.	There is also no reference in the NPFF to a hamlet or farmstead where there is an existing dwelling and that reference in the policy should be deleted. Paragraphs 3, 4 and 5 of the policy are not in accordance with the NPFF and should be deleted.
0058	0058/23	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	See Business Exmoor Comment above	SE-D1 - Home Based Businesses	Policy SE-D1. The application of Policy HC-D15 is inappropriate and para 1 b) should be deleted. Extensions to residential properties to accommodate business use should be assessed according to the needs of the particular business.	Para 1 b) should be deleted.



Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
0058	0058/24	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	See Business Exmoor Comment above	SE-S4 - AGRICULTURAL AND FORESTRY DEVELOPMENT	<p>Policy SE-S4. Para 1. c) should be deleted as it would prevent development on off lying land in circumstances where that land is owned and operated alongside an established business with existing buildings even where a functional need can be demonstrated for that development. That would be contrary to the NPPF and the GPDO which supports development for agricultural purposes where a functional need has been demonstrated.</p> <p>Para 2 should be deleted because it is contrary to the NPPF and the GPDO which specifically supports and enables the re-use of agricultural buildings for other business use, including within the National Parks.</p> <p>Para 3 should be deleted as it seeks to apply an unnecessary and additional requirement that is inconsistent with the NPPF and GPDO which supports and enables agricultural and forestry development in all cases where a functional need can be demonstrated. Landscape, siting and design issues are all already covered by the policy at para 1. d).</p>	<p>Policy SE-S4. Para 1. c) should be deleted.</p> <p>Para 2 should be deleted.</p> <p>Para 3 should be deleted.</p>
0058	0058/25	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	See Business Exmoor Comment above	ES-S1 - SUPPORTING LOCAL COMMUNITIES	BE supports policy ES-S1.	

Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
0058	0058/26	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated		6 Achieving a Thriving Community	<p>We note that the policies in the NPPF and associated PPG referable to affordable housing obligations and the vacant building credit have been examined by the Court in the case of 'West Berkshire District Council And Reading Borough Council - v - Department for Communities and Local Government' and that the Court has found those policies to be unsound on a number of grounds. We note that the effect of the judgment is that those policies no longer apply with immediate effect.</p> <p>Business Exmoor does not wish to amend its submissions as a result of this judgment and the changes to the NPPF and PPG that arise from it. However, we note that the tests as to whether or not the local plan policies comply or otherwise with the NPPF and PPG will be made with reference to the current state of the NPPF and the PPG.</p>	
0059	0059/01	Mark Thomasin-Foster Exmoor Rivers and Streams Strategic Overview Group	Not Stated	Not Stated	Not Stated		Whole Plan	Overall our view is that the plan is comprehensive and supportive of the special qualities of the Park.	

0059	0059/02	Mark Thomasin-Foster Exmoor Rivers and Streams Strategic Overview Group	Not Stated	Not Stated	Not Stated		CE-S3 - BIODIVERSITY AND GREEN INFRASTRUCTURE	<p>It does appear that parts of the plan look inwards whereas the Park has such an important role to the wider countryside and indeed nationally. The obvious issue for example here is water, quantity and quality. This water leaves the Park for “use” elsewhere and not only in domestic and commercial situations but also for the environment. Additional to such a wider view and in reverse, no account has been made of external factors affecting habitats and species within and important to the Park. The obvious example here is the cumulative effect of weirs etc. on rivers outside the Park where iconic Exmoor species are likely to suffer. The point we make is that the Local Plan must look outwards to Exmoor’s responsibilities in the wider countryside and vice versa. We would have liked to have seen reference to ENP having assured consultee status in these circumstances of cross boundary issues.</p> <p>Perhaps our main comment concerns the links made between the protection of species and habitats and the planning system. We are fully aware of the need to reach a fair compromise between conflicting interests but our concern is that the plan does not convey clearly the regard that is needed towards the priority species and habitats. What will be of critical importance is how the requirement to consider these species and habitats (listed in the Exmoor Wildlife Research &amp; Monitoring Framework) will be applied in practice. Currently this clarity is missing.</p> <p>Our last point is we hope that on all riverine issues ERaSG would be consulted.</p>	<p>We are fully aware of the need to reach a fair compromise between conflicting interests but our concern is that the plan does not convey clearly the regard that is needed towards the priority species and habitats. What will be of critical importance is how the requirement to consider these species and habitats (listed in the Exmoor Wildlife Research &amp; Monitoring Framework) will be applied in practice. Currently this clarity is missing.</p>
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0059	0059/03	Mark Thomasin-Foster Exmoor Rivers and Streams Strategic Overview Group	Not Stated	Not Stated	Not Stated		CC-S5 - LOW CARBON AND RENEWABLE ENERGY DEVELOPMENT	We know that hydropower schemes will be contentious and detrimental on main rivers but the reference to hydro renewable energy in the draft plan does not aid the understanding of the significant difference between those schemes on small streams and those on rivers.	Whilst we do not seek a fuller text on hydro, it might be of improved value if a simple reference is made to the detailed website guidance recently agreed with the ENPA.

0060 0060/01	Mrs Molly Groves Exmoor Uprising	No	No	No	<p>THIS LOCAL PLAN MUST NOT BE PASSED UNLESS THE FOLLOWING IS TAKEN INTO ACCOUNT AND INCLUDED PLEASE:</p> <p>Exmoor needs to keep their local contractors and workforce together because they have the expert working knowledge and experience for the CONSERVATION of the moorland, farmland, wildlife, walling, hedge-laying, drainage and forestry etc. learnt at the fathers knee.</p> <p>We need to keep these people, together with their families, living on the moor, in the remoter areas surrounding the villages, to continue this conservation and to enable all ages of these local families to support one another in the</p>	<p>HC-D5 - Custom/Self Build Local Need Housing in Rural Communities</p>	<p>For 5 years we have tried to gain a flexible, workable plan for housing low income, indigenous, Exmoor local inhabitants who CANNOT AFFORD so-called affordable homes to rent. Also these homes are needed outside the village curtilages named. Allowing local families to live near one another in remote areas to support the generations. As we explain in the enclosures here and give proof. It is alleged that Planners are allowing certain people to have wooden homes which are cheaper - against their own PLANNING CRITERION. See enclosure 5.</p> <p>HC-D5: Please note that despite being very actively involved in this matter we have not been consulted directly until 6 weeks ago. We are beginning to feel that the Planning Department has either no sympathy or understanding, of the needs of rural, indigenous workers, or is being deliberately awkward or obtuse in their behaviour in this matter.</p> <p>HC-D5 IN CUSTOM/SELF BUILD HOUSING in this DRAFT PLAN encourages custom build housing (by a builder) or where a private individual builds their own home as a "self build" where this meets local affordable housing need. This may be within "NAMED SETTLEMENTS" as a new build or conversion. "But locals could never get to the price of the plots never mind build them".</p> <p>Then it states "in the open countryside THEY WOULD BE as "conversions" in hamlets or on farmsteads of as a "new building" in rural communities which have a local service such as a shop, pub or community meeting place/hall.</p>	<p>See last page of our enclosures for details of SOLUTION TO OUR COMPLAINT. We have put forward our REQUEST FOR INCLUSION of locally affordable homes separately in on block ATTACHED</p>
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					<p>remoter areas, where they were born, need to live and continue their excellent work of maintaining the fabric of Exmoor National Park.</p> <p>Also to keep the traditions and community spirit of the villages which serve them which is one of the CORE PRINCIPLES OF THE NATIONAL PARKS 1949. Otherwise they become STERILE second homes or electrically gated big money, NON COMMUNITIES.</p> <p>Park planners seem to want to shove all locals into the bigger villages, tacked on to expensive estates, in houses with rents and maintenance agreements they cannot afford. Any so-called cheap building plots are in the worst part of the</p>	<p>BUT every little hamlet or remote farm or building GIVES SERVICES, TO AND RECEIVES FROM, SUCH VILLAGES.</p>	
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					<p>estate and not big enough for rabbit hutches. Without ABSOLUTELY NO THOUGHT as to what is really needed. TRAVELLERS HAVE FAR MORE RIGHTS THAN THE INDIGENOUS POPULATION OF EXMOOR.</p> <p>These builder led so-called "AFFORDABLE HOUSING" efforts are not "affordable" to low earning people, many of whom are self employed, or seasonal and very dependent on the weather. Some people have moved to these houses but found they have to move back to their families because they can't afford them.</p> <p>For the last FIVE YEARS we have been begging, pleading, and standing on our heads to try and get</p>			
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					<p>a cheaper form of housing such as log cabins, designed to suit the needs of the LOCAL WORKING, SELF EMPLOYED, LOW PAID, ABSOLUTELY KEY WORK FORCE who maintain the conservation of Exmoor National Park SO VERY WELL.</p> <p>During that time three wooden houses have been erected [redacted text] Two within the curtilage of a village but one right out in the middle of nowhere which we shall deal with in more detail later.</p> <p>Nevertheless we have read the Draft carefully and these are our findings:  A. We consider much of this Plan is already in place and most of the rest is acceptable. Because of the delay in dealing with this</p>		
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					<p>plan which was supposed to start in 2011 we think it should only be for 10 YEARS and a further draft plan started immediately to take effect from 2020.</p> <p>B. BUT NO CONSIDERATION WHATSOEVER HAS BEEN GIVEN in this plan to the needs and requirements to enable the working people described in our introduction to have the place they are ENTITLED to under the National Park core principles.</p> <p>C. On the page 3 we give you our thoughts on the actual numbers of the Consultation. HC-D5, HC-D8, HC-D9 and HC-D12. THEN WE HAVE ADDED OUR OWN NUMBER HC-D7777.</p> <p>D. Page 4 onwards deal with the</p>			
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				<p>reasons, descriptions and explanations we have for the ENCLOSURES ADDED TO THIS DOCUMENT.</p> <p>These are the conclusions we have come to and the reasons for coming to them.</p> <p>We have pleaded and begged for a LEVEL PLAYING FIELD FOR ALL LOCAL OCCUPANTS OF EXMOOR NOT, AS IS ALLEGED, JUST A SELECT FEW.</p> <p>WE FEEL THIS GOES AGAINST THE CORE PRINCIPLES OF NATIONAL PARKS.</p> <p>THEREFORE WE FEEL WE CANNOT AGREE TO THIS PLAN - UNLESS, AND UNTIL, OUR REQUEST FOR CHANGE IS DEALT WITH AND A FAIR PLANNING ARRANGEMENT IS</p>			
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Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
						<p>PUT IN PLACE FOR LOCAL WORKING PEOPLE WHO CANNOT AFFORD THE - SO-CALLED "AFFORDABLE HOMES" OF BRICKS AND MORTAR ERECTED BY BUILDERS AND HOUSING ASSOCIATIONS.</p> <p>PLEASE ON BEHALF OF EXMOOR WILL YOU MAKE SURE THESE LOCAL NEEDS WHICH ARE SO IMPORTANT ARE PUT INTO THIS LOCAL PLAN BEFORE YOU PASS IT.</p>			

Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
0060	0060/02	Mrs Molly Groves Exmoor Uprising	No	No	No	See Exmoor Uprising comment above	HC-D8 - New Build Dwellings in the Open Countryside	<p>For 5 years we have tried to gain a flexible, workable plan for housing low income, indigenous, Exmoor local inhabitants who CANNOT AFFORD so-called affordable homes to rent. Also these homes are needed outside the village curtilages named. Allowing local families to live near one another in remote areas to support the generations. As we explain in the enclosures here and give proof. It is alleged that Planners are allowing certain people to have wooden homes which are cheaper - against their own PLANNING CRITERION. See enclosure 5.</p> <p>HC-D8 AND HC-D9. deals with the need for rural workers in land-based businesses such as agriculture and forestry, to make provision for succession farming.</p> <p>Newly established rural land-based businesses can have a residential caravan or other temporary dwelling for a period to enable the business to establish (HC-D11).</p>	See last page of our enclosures for details of SOLUTION TO OUR COMPLAINT. We have put forward our REQUEST FOR INCLUSION of locally affordable homes separately in on block ATTACHED

Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
0060	0060/03	Mrs Molly Groves Exmoor Uprising	No	No	No	See Exmoor Uprising comment above	HC-D9 - Rural Workers	<p>For 5 years we have tried to gain a flexible, workable plan for housing low income, indigenous, Exmoor local inhabitants who CANNOT AFFORD so-called affordable homes to rent. Also these homes are needed outside the village curtilages named. Allowing local families to live near one another in remote areas to support the generations. As we explain in the enclosures here and give proof. It is alleged that Planners are allowing certain people to have wooden homes which are cheaper - against their own PLANNING CRITERION. See enclosure 5.</p> <p>HC-D8 AND HC-D9. deals with the need for rural workers in land-based businesses such as agriculture and forestry, to make provision for succession farming.</p> <p>Newly established rural land-based businesses can have a residential caravan or other temporary dwelling for a period to enable the business to establish (HC-D11).</p>	<p>See last page of our enclosures for details of SOLUTION TO OUR COMPLAINT.</p> <p>We have put forward our REQUEST FOR INCLUSION of locally affordable homes separately in on block ATTACHED</p>

Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
0060	0060/04	Mrs Molly Groves Exmoor Uprising	No	No	No	See Exmoor Uprising comment above	HC-D12 - Replacement of Rural Workers Occupancy Conditions	<p>For 5 years we have tried to gain a flexible, workable plan for housing low income, indigenous, Exmoor local inhabitants who CANNOT AFFORD so-called affordable homes to rent. Also these homes are needed outside the village curtilages named. Allowing local families to live near one another in remote areas to support the generations. As we explain in the enclosures here and give proof. It is alleged that Planners are allowing certain people to have wooden homes which are cheaper - against their own PLANNING CRITERION. See enclosure 5.</p> <p>Policy HC-D12 allows the occupancy tie to be replaced with a legal agreement limiting the occupancy to a local person in affordable housing need, if it cannot be occupied as a rural worker's dwelling.</p> <p>THIS POLICY HC-D12. Tied occupancy mentioned above.</p>	<p>See last page of our enclosures for details of SOLUTION TO OUR COMPLAINT.</p> <p>We have put forward our REQUEST FOR INCLUSION of locally affordable homes separately in on block ATTACHED</p>

Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
0060	0060/05	Mrs Molly Groves Exmoor Uprising	Not Stated	Not Stated	Not Stated		6 Achieving a Thriving Community		<p>HC-D7777. OR SOME SUCH NUMBER</p> <p>We request that this type of policy be should be clearly extended to cover the very legitimate local needs or local low paid working people but with a wider flexibility with regard to the design put beside or near permanent buildings not TIN SHEDS as has happened with a so-called agricultural workers dwelling in an exposed position.</p> <p>But at the same time preventing these homes being turned into yet more second homes.</p>

Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
0061	0061/01	Mr Mervyn Orchard-Lisle Monksilver Parish Council	Not Stated	Not Stated	Not Stated		HC-S2 - A BALANCED LOCAL HOUSING STOCK	<p>We are concerned about the apparent insistence on all housing being limited to (a) affordable housing, and (b) a maximum size of 90m<sup>2</sup>, for the following reasons:</p> <ul style="list-style-type: none"> <li>• Whereas we support affordable housing, the requirement for 100% to be affordable, disregards a large proportion of the population who can afford to buy, and who will therefore pump much needed cash into the Exmoor economy.</li> <li>• 90 sq. m. is adequate for a small family, but not for a family of 5 or more. Are large families needing affordable housing not being catered for? Are they expected to live with substandard space needs, well under the old Parker Morris standards. A report was published in April 2013 said that “Britain has the smallest homes in Europe, and getting smaller”. Whereas substandard space standards may conceivably be more justifiable in inner cities, one of the benefits of Exmoor is that it has plenty of space. Perhaps you should allow flexibility within these policies? The parameters of “Size” and “Cost” are not always inter-related.</li> <li>• Social engineering on this scale will eventually put a financial premium on larger houses, thus disadvantaging one group of people whom Exmoor should be wanting to help.</li> </ul>	



Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
0061	0061/02	Mr Mervyn Orchard-Lisle Monksilver Parish Council	Not Stated	Not Stated	Not Stated		HC-D2 - New Build Dwellings in Settlements	<p>We are concerned about the apparent insistence on all housing being limited to (a) affordable housing, and (b) a maximum size of 90m<sup>2</sup>, for the following reasons:</p> <ul style="list-style-type: none"> <li>• Whereas we support affordable housing, the requirement for 100% to be affordable, disregards a large proportion of the population who can afford to buy, and who will therefore pump much needed cash into the Exmoor economy.</li> <li>• 90 sq. m. is adequate for a small family, but not for a family of 5 or more. Are large families needing affordable housing not being catered for? Are they expected to live with substandard space needs, well under the old Parker Morris standards. A report was published in April 2013 said that “Britain has the smallest homes in Europe, and getting smaller”. Whereas substandard space standards may conceivably be more justifiable in inner cities, one of the benefits of Exmoor is that it has plenty of space. Perhaps you should allow flexibility within these policies? The parameters of “Size” and “Cost” are not always inter-related.</li> <li>• Social engineering on this scale will eventually put a financial premium on larger houses, thus disadvantaging one group of people whom Exmoor should be wanting to help.</li> </ul>	

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0061	0061/03	Mr Mervyn Orchard-Lisle Monksilver Parish Council	Not Stated	Not Stated	Not Stated		HC-D8 - New Build Dwellings in the Open Countryside	<p>We are concerned about the apparent insistence on all housing being limited to (a) affordable housing, and (b) a maximum size of 90m<sup>2</sup>, for the following reasons:</p> <ul style="list-style-type: none"> <li>• Whereas we support affordable housing, the requirement for 100% to be affordable, disregards a large proportion of the population who can afford to buy, and who will therefore pump much needed cash into the Exmoor economy.</li> <li>• 90 sq. m. is adequate for a small family, but not for a family of 5 or more. Are large families needing affordable housing not being catered for? Are they expected to live with substandard space needs, well under the old Parker Morris standards. A report was published in April 2013 said that “Britain has the smallest homes in Europe, and getting smaller”. Whereas substandard space standards may conceivably be more justifiable in inner cities, one of the benefits of Exmoor is that it has plenty of space. Perhaps you should allow flexibility within these policies? The parameters of “Size” and “Cost” are not always inter-related.</li> <li>• Social engineering on this scale will eventually put a financial premium on larger houses, thus disadvantaging one group of people whom Exmoor should be wanting to help.</li> </ul>	

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0061	0061/04	Mr Mervyn Orchard-Lisle Monksilver Parish Council	Not Stated	Not Stated	Not Stated		HC-D15 - Residential Extensions	<p>We are concerned about the apparent insistence on all housing being limited to (a) affordable housing, and (b) a maximum size of 90m<sup>2</sup>, for the following reasons:</p> <ul style="list-style-type: none"> <li>• Whereas we support affordable housing, the requirement for 100% to be affordable, disregards a large proportion of the population who can afford to buy, and who will therefore pump much needed cash into the Exmoor economy.</li> <li>• 90 sq. m. is adequate for a small family, but not for a family of 5 or more. Are large families needing affordable housing not being catered for? Are they expected to live with substandard space needs, well under the old Parker Morris standards. A report was published in April 2013 said that “Britain has the smallest homes in Europe, and getting smaller”. Whereas substandard space standards may conceivably be more justifiable in inner cities, one of the benefits of Exmoor is that it has plenty of space. Perhaps you should allow flexibility within these policies? The parameters of “Size” and “Cost” are not always inter-related.</li> <li>• Social engineering on this scale will eventually put a financial premium on larger houses, thus disadvantaging one group of people whom Exmoor should be wanting to help.</li> </ul>	

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0061	0061/05	Mr Mervyn Orchard-Lisle Monksilver Parish Council	Not Stated	Not Stated	Not Stated		CE-S6 - DESIGN & SUSTAINABLE CONSTRUCTION PRINCIPLES	<p>HOUSING: SUSTAINABILITY: There seems to be a lost opportunity that in 2015, you are not pursuing a more Low Carbon housing stock, each new house using renewable energy. You seem to be falling behind other local authority planning authorities.</p> <p>DESIGN: There seems to be very little encouragement in the Local Plan for excellence in Architectural Design.</p>	

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0061	0061/06	Mr Mervyn Orchard-Lisle Monksilver Parish Council	Not Stated	Not Stated	Not Stated		10 Exmoor's Settlements 10.89 - 10.94	<p>SECTIONS 10.89 – 10.94 MONKSILVER: The map of Monksilver shows a red dotted line around the village. The Map Legend shows it as the “historic settlement core”, but nowhere in the text does it explain what it actually means from a policy point-of-view. This line has changed in this Local Plan (2011-2031) compared to the earlier one (2001-2011). Further to my recent telephone conversation with Tessa Saunders, I gather that virtually all settlements have had their “historic settlement cores” revised as a result of a review by your Historic Environment team. The red line denotes that any development within the line would be subject to an archaeological review before any decision is made, possibly imposing an archaeological investigation condition. I understand that otherwise this line has absolutely no further significance. It would be helpful if the text of the document stated this somewhere.</p> <p>Tessa Saunders advised that this revised information came from old Tithe Maps, and she kindly agreed to email digital versions for us to look at.</p>	

Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
0061	0061/07	Mr Mervyn Orchard-Lisle Monksilver Parish Council	Not Stated	Not Stated	Not Stated		6 Achieving a Thriving Community	There was one further comment that we would wish to make - a comment of support:  HOUSING: We very much support your policies which help the possibilities for local people to purchase affordable houses within Exmoor National Park.	
0062	0062/01	Mr Nick Bryant Taunton Deane and West Somerset Councils	Not Stated	Not Stated	Not Stated	Please be advised that having considered the Publication Exmoor National Park Local Plan West Somerset Council have no formal comments to make on the document.			

0063	0063/01	Sue Green Home Builders Federation Ltd	Not Stated	Not Stated	No	<p>There are a number of concerns about the soundness of the Local Plan in particular Policies HC-S1, HC-S2, HC-D1 to D3, HC-D5, HC-D6, HC-D9, HCD17, AC-D3 and ES-S2 as outlined above. The National Park Authority should re-consider these policies otherwise the Local Plan is at risk of not been positively prepared and properly justified and therefore inconsistent with national policy and unlikely to be effective.</p>	6 Achieving a Thriving Economy	<p><b>Housing Needs and Supply</b>                  The Northern Peninsula Strategic Housing Market Area Assessment (SHMAA) Update published in January 2015 provides an assessment of housing needs for West Somerset, North Devon and Torridge District Councils including any administrative areas in the Exmoor National Park. The objectively assessed housing need (OAHN) for Exmoor National Park is identified as a range between 664 – 744 dwellings for the plan period 2011 – 2031. A preferred OAHN is set out as 685 dwellings. The selection of a preferred OAHN at the lower end of the range is questionable. As explained in recent Local Plan Inspector’s Reports at North Somerset and Brighton and Hove the upper end of a range is more appropriate. Moreover the derivation of the OAHN is not obvious from the evidence contained in the Northern Peninsula HMA SHMAA Update Final Report dated January 2015 by Housing Vision. The Report is not easy to translate so it is difficult to determine if the OAHN established in the SHMAA work will meet demographic projections, economic growth, market signals, affordability and boost housing supply as claimed. The HBF has submitted representations to Local Plan consultations for other authorities in the Northern Peninsula Housing Market Area (HMA) which are critical of proposed OAHN figures. The National Park Authority together with other Northern Peninsula HMA authorities should provide further clarification.                  The SHMAA establishes that the OAHN for the National Park area in North Devon is 205 dwellings comprising of housing needs for 131 affordable houses and 74 market houses. The OAHN for the National Park area in West</p>	
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								<p>Somerset is established as 480 dwellings comprising of housing needs for 306 affordable houses and 174 market houses.</p> <p>The Housing Topic Paper dated June 2015 sets out that under the Duty to Co-operate 205 dwellings will be provided in the housing requirement set out in the North Devon &amp; Torridge Joint Local Plan to meet OAHN arising in the National Park in North Devon. These dwellings will be provided in North Devon but outside the National Park. With regards to the 174 market housing needs arising within the National Park in West Somerset there is no such agreement between the respective authorities. Indeed as set out in the Duty to Co-operate Statement dated May 2015 under Strategic Priority of Housing Provision the National Park Authority states that West Somerset Council’s response to the formal request for assistance with unmet housing needs was “unable to accommodate”. As a consequence the National Park Authority has submitted objections to the West Somerset Publication Draft Local Plan in March 2015. This unresolved matter of unmet housing needs should be agreed before the submission of the Exmoor Local Plan to the Secretary of State for examination.</p> <p>The Exmoor Local Plan seeks to meet the needs of local communities through policies to support the provision of local needs affordable housing for those who may live and / or work on Exmoor as set out in Strategic Priority 2, Objectives 12 &amp; 13, Policy GP1(c) and Policy HC-S1 Housing. The Local Plan does not specify any housing requirement figures for open market nor affordable housing instead a rural exceptions approach is proposed with no housing target only an estimate of local housing need of 306 units over the plan period</p>	
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								<p>2011 – 2031 and no land allocations. The latest Strategic Housing Land Availability Assessment (SHLAA) estimates a potential land supply of 249 dwellings. This suggests a shortfall between the potential housing land supply and the estimated local affordable housing need.</p> <p>Open market housing will only be permitted in the form of principle residence housing in Local Service Centres and Villages, if necessary to fund affordable housing. The settlement hierarchy is defined in Policy GP3 – Spatial Strategy comprising of three Local Service Villages at Dulverton, Lynton &amp; Lynmouth and Porlock, eighteen named Villages, Porlock Weir (Replacement Development from Coastal Change Management Areas) and Open Countryside everywhere else.</p>	
0063	0063/02	Sue Green Home Builders Federation Ltd	Not Stated	Not Stated	No	See HBF comment above	HC-S1 - HOUSING		The text box accompanying Policy HC-S1 should refer to the Written Ministerial Statement dated 25th March 2015 as well as the NPPG.

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0063	0063/03	Sue Green Home Builders Federation Ltd	Not Stated	Not Stated	No	See HBF comment above	GP5 - GENERAL POLICY: SECURING PLANNING BENEFITS - PLANNING OBLIGATIONS	Section 106 Planning Obligations / CIL Under Policy GP5 Securing Planning Benefits – Planning Obligations the National Park Authority proposes not to adopt a Community Infrastructure Levy (CIL) at this time but to keep this proposal under review. However by deciding not to have a CIL the National Park Authority should consider the implications if any of the recently imposed pooling restrictions on Section 106 contributions which became effective on 5th April 2015.	

0063	0063/04	Sue Green Home Builders Federation Ltd	Not Stated	Not Stated	No	See HBF comment above	HC-S2 - A BALANCED LOCAL HOUSING STOCK	<p>Housing Standards</p> <p>From the reference to dwelling sizes in Policies HC-S2 (b), HC-D1 (1d), HC-D2 (1d), HC-D3 (1b), HC-D5 (1d), HC-D6 (1e), Hc-D9 (1d) and HC-D17 (2b) it is not obvious if the National Park Authority is proposing to adopt the nationally described space standard. If this is the intention then in order to do so the National Park Authority must comply with national policy in the form of the Written Ministerial Statement dated 25th March 2015 which states “the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG”. Paragraph ID: 56-020-20150327 of the NPPG sets out “where a need for internal space standards is identified, Local Planning Authorities (LPA) should provide justification for requiring internal space policies. LPAs should take account of the following areas :-</p> <ul style="list-style-type: none"> <li>• need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.</li> <li>• viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.</li> <li>• timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to</li> </ul>	
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Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
								<p>factor the cost of space standards into future land acquisitions”.</p> <p>The above comments on compliance with national policy are also relevant to the reference to adaptable homes in Policy HC-S2 (a).</p>	

0063	0063/05	Sue Green Home Builders Federation Ltd	Not Stated	Not Stated	No	See HBF comment above	HC-D1 - Conversions to Dwellings in Settlements	<p>Housing Standards</p> <p>From the reference to dwelling sizes in Policies HC-S2 (b), HC-D1 (1d), HC-D2 (1d), HC-D3 (1b), HC-D5 (1d), HC-D6 (1e), Hc-D9 (1d) and HC-D17 (2b) it is not obvious if the National Park Authority is proposing to adopt the nationally described space standard. If this is the intention then in order to do so the National Park Authority must comply with national policy in the form of the Written Ministerial Statement dated 25th March 2015 which states “the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG”. Paragraph ID: 56-020-20150327 of the NPPG sets out “where a need for internal space standards is identified, Local Planning Authorities (LPA) should provide justification for requiring internal space policies. LPAs should take account of the following areas :-</p> <ul style="list-style-type: none"> <li>• need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.</li> <li>• viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.</li> <li>• timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to</li> </ul>	
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Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
								<p>factor the cost of space standards into future land acquisitions".</p> <p>The above comments on compliance with national policy are also relevant to the reference to adaptable homes in Policy HC-S2 (a).</p>	

0063	0063/06	Sue Green Home Builders Federation Ltd	Not Stated	Not Stated	No	See HBF comment above	HC-D2 - New Build Dwellings in Settlements	<p>Housing Standards</p> <p>From the reference to dwelling sizes in Policies HC-S2 (b), HC-D1 (1d), HC-D2 (1d), HC-D3 (1b), HC-D5 (1d), HC-D6 (1e), Hc-D9 (1d) and HC-D17 (2b) it is not obvious if the National Park Authority is proposing to adopt the nationally described space standard. If this is the intention then in order to do so the National Park Authority must comply with national policy in the form of the Written Ministerial Statement dated 25th March 2015 which states “the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG”. Paragraph ID: 56-020-20150327 of the NPPG sets out “where a need for internal space standards is identified, Local Planning Authorities (LPA) should provide justification for requiring internal space policies. LPAs should take account of the following areas :-</p> <ul style="list-style-type: none"> <li>• need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.</li> <li>• viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.</li> <li>• timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to</li> </ul>	
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								<p>factor the cost of space standards into future land acquisitions”.</p> <p>The above comments on compliance with national policy are also relevant to the reference to adaptable homes in Policy HC-S2 (a).</p>	



0063	0063/07	Sue Green Home Builders Federation Ltd	Not Stated	Not Stated	No	See HBF comment above	HC-D3 - Specialist Housing for Exmoor's Communities	<p>Housing Standards</p> <p>From the reference to dwelling sizes in Policies HC-S2 (b), HC-D1 (1d), HC-D2 (1d), HC-D3 (1b), HC-D5 (1d), HC-D6 (1e), Hc-D9 (1d) and HC-D17 (2b) it is not obvious if the National Park Authority is proposing to adopt the nationally described space standard. If this is the intention then in order to do so the National Park Authority must comply with national policy in the form of the Written Ministerial Statement dated 25th March 2015 which states “the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG”. Paragraph ID: 56-020-20150327 of the NPPG sets out “where a need for internal space standards is identified, Local Planning Authorities (LPA) should provide justification for requiring internal space policies. LPAs should take account of the following areas :-</p> <ul style="list-style-type: none"> <li>• need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.</li> <li>• viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.</li> <li>• timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to</li> </ul>	
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								<p>factor the cost of space standards into future land acquisitions".</p> <p>The above comments on compliance with national policy are also relevant to the reference to adaptable homes in Policy HC-S2 (a).</p>	

0063	0063/08	Sue Green Home Builders Federation Ltd	Not Stated	Not Stated	No	See HBF comment above	HC-D5 - Custom/Self Build Local Need Housing in Rural Communities	<p>Housing Standards</p> <p>From the reference to dwelling sizes in Policies HC-S2 (b), HC-D1 (1d), HC-D2 (1d), HC-D3 (1b), HC-D5 (1d), HC-D6 (1e), Hc-D9 (1d) and HC-D17 (2b) it is not obvious if the National Park Authority is proposing to adopt the nationally described space standard. If this is the intention then in order to do so the National Park Authority must comply with national policy in the form of the Written Ministerial Statement dated 25th March 2015 which states “the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG”. Paragraph ID: 56-020-20150327 of the NPPG sets out “where a need for internal space standards is identified, Local Planning Authorities (LPA) should provide justification for requiring internal space policies. LPAs should take account of the following areas :-</p> <ul style="list-style-type: none"> <li>• need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.</li> <li>• viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.</li> <li>• timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to</li> </ul>	
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								<p>factor the cost of space standards into future land acquisitions".</p> <p>The above comments on compliance with national policy are also relevant to the reference to adaptable homes in Policy HC-S2 (a).</p>	

0063	0063/09	Sue Green Home Builders Federation Ltd	Not Stated	Not Stated	No	See HBF comment above	HC-D6 - The Change of Use of Serviced Accommodation to Housing	<p>Housing Standards</p> <p>From the reference to dwelling sizes in Policies HC-S2 (b), HC-D1 (1d), HC-D2 (1d), HC-D3 (1b), HC-D5 (1d), HC-D6 (1e), Hc-D9 (1d) and HC-D17 (2b) it is not obvious if the National Park Authority is proposing to adopt the nationally described space standard. If this is the intention then in order to do so the National Park Authority must comply with national policy in the form of the Written Ministerial Statement dated 25th March 2015 which states “the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG”. Paragraph ID: 56-020-20150327 of the NPPG sets out “where a need for internal space standards is identified, Local Planning Authorities (LPA) should provide justification for requiring internal space policies. LPAs should take account of the following areas :-</p> <ul style="list-style-type: none"> <li>• need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.</li> <li>• viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.</li> <li>• timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to</li> </ul>	
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								<p>factor the cost of space standards into future land acquisitions”.</p> <p>The above comments on compliance with national policy are also relevant to the reference to adaptable homes in Policy HC-S2 (a).</p>	

0063	0063/10	Sue Green Home Builders Federation Ltd	Not Stated	Not Stated	No	See HBF comment above	HC-D9 - Rural Workers	<p>Housing Standards</p> <p>From the reference to dwelling sizes in Policies HC-S2 (b), HC-D1 (1d), HC-D2 (1d), HC-D3 (1b), HC-D5 (1d), HC-D6 (1e), Hc-D9 (1d) and HC-D17 (2b) it is not obvious if the National Park Authority is proposing to adopt the nationally described space standard. If this is the intention then in order to do so the National Park Authority must comply with national policy in the form of the Written Ministerial Statement dated 25th March 2015 which states “the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG”. Paragraph ID: 56-020-20150327 of the NPPG sets out “where a need for internal space standards is identified, Local Planning Authorities (LPA) should provide justification for requiring internal space policies. LPAs should take account of the following areas :-</p> <ul style="list-style-type: none"> <li>• need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.</li> <li>• viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.</li> <li>• timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to</li> </ul>	
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								<p>factor the cost of space standards into future land acquisitions".</p> <p>The above comments on compliance with national policy are also relevant to the reference to adaptable homes in Policy HC-S2 (a).</p>	



0063	0063/11	Sue Green Home Builders Federation Ltd	Not Stated	Not Stated	No	See HBF comment above	HC-D17 - Replacement Dwellings	<p>Housing Standards</p> <p>From the reference to dwelling sizes in Policies HC-S2 (b), HC-D1 (1d), HC-D2 (1d), HC-D3 (1b), HC-D5 (1d), HC-D6 (1e), Hc-D9 (1d) and HC-D17 (2b) it is not obvious if the National Park Authority is proposing to adopt the nationally described space standard. If this is the intention then in order to do so the National Park Authority must comply with national policy in the form of the Written Ministerial Statement dated 25th March 2015 which states “the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG”. Paragraph ID: 56-020-20150327 of the NPPG sets out “where a need for internal space standards is identified, Local Planning Authorities (LPA) should provide justification for requiring internal space policies. LPAs should take account of the following areas :-</p> <ul style="list-style-type: none"> <li>• need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.</li> <li>• viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.</li> <li>• timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to</li> </ul>	
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								<p>factor the cost of space standards into future land acquisitions".</p> <p>The above comments on compliance with national policy are also relevant to the reference to adaptable homes in Policy HC-S2 (a).</p>	

0063 0063/12	Sue Green Home Builders Federation Ltd	Not Stated	Not Stated	No	See HBF comment above	AC-D3 - Parking Provision and Standards	<p>Car Parking Standards</p> <p>It is noted that Policy AC-D3 refers to parking standards. The National Park Authority should re-check for compliance with national policy as the Written Ministerial Statement dated 25th March 2015 states “This government is keen to ensure that there is adequate parking provision ... in new residential developments .... The imposition of maximum parking standards under the last administration lead to blocked and congested streets and pavement parking. Arbitrarily restricting new off-street parking spaces does not reduce car use, it just leads to parking misery. It is for this reason that the government abolished national maximum parking standards in 2011. The market is best placed to decide if additional parking spaces should be provided. However, many councils have embedded the last administration’s revoked policies. Following a consultation, we are now amending national planning policy to further support the provision of car parking spaces. Parking standards are covered in paragraph 39 of the NPPF. The following text now needs to be read alongside that paragraph: “Local Planning Authorities should only impose local parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network.””</p>	
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Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
0063	0063/13	Sue Green Home Builders Federation Ltd	Not Stated	Not Stated	No	See HBF comment above	ES-S2 - LYNTON AND LYNMOUTH NEIGHBOURHOOD PLAN	Neighbourhood Planning Paragraph 184 of the NPPF requires that Neighbourhood Plans should be aligned with the strategic needs and priorities of the wider area therefore Neighbourhood Plans must be in general conformity with the strategic policies of the Local Plan in the case of Exmoor Local Plan these strategic policies are set out in Policies GP1 to GP5. A Neighbourhood Plan only takes precedence over non-strategic policies of the Local Plan (paragraph 185 of the NPPF) in the determination of decisions on planning applications (paragraph 183 of the NPPF). Therefore a precedence in favour of the Lynton and Lynmouth Neighbourhood Plan as set out in Policy ES-S2 should not usurp the strategic policies of the Exmoor Local Plan. Further consideration should be given to this policy by the National Park Authority to determine whether or not it conforms to national policy.	Therefore a precedence in favour of the Lynton and Lynmouth Neighbourhood Plan as set out in Policy ES-S2 should not usurp the strategic policies of the Exmoor Local Plan.

0064	0064/01	Mr Bruce Pollard Western Power Distribution	Yes	Yes	No		AC-S4 - ELECTRICITY AND COMMUNICATIONS NETWORKS	On behalf of Western Power we propose that whilst Western Power Distribution are not against locating, siting or designing electricity networks that will minimise impacts on landscape/seascape, visual amenity, biodiversity and the cultural heritage of the National Park, these requirements must be considered alongside the statutory and legal obligation of Western Power to offer economic connections and to own, develop and operate an economic and efficient network.	<p>On behalf of Western Power we request that the wording of paragraphs within the proposed policy AC-S4 (specifically 2.a and 3) are amended to reflect the statutory and legal obligation of Western Power to offer economic connections and to own, develop and operate an economic and efficient network.</p> <p>More generally we would ask that the Authority note that Western Power Distribution would normally seek to retain the position of electricity circuits operating at 132,000 Volts (132kV) and 66,000 Volts (66kV) and in some cases 33,000 Volts (33kV), particularly if the diversion of such circuits placed a financial obligation on Western Power Distribution to either divert or underground them as any such obligation would go against the statutory and regulatory requirement on Western Power Distribution to operate an economic and efficient electricity distribution system.</p> <p>Western Power Distribution would generally expect developers of a site to pay to divert less strategic electricity</p>
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Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
									circuits operating at 11,000 Volts (11kV) or below. This may include undergrounding some 11kV and low voltage overhead lines as necessary.

0064	0064/02	Mr Bruce Pollard Western Power Distribution	Yes	Yes	No		AC-D6 - Fixed Line Transmission Infrastructure	In regards paragraph 1,2 and 3 of the proposed policy, whilst Western Power do not object to the underground routing of cables and wires, any such policy requirement to route wires/cables underground must be considered alongside the statutory and legal obligation of Western Power to offer economic connections and to own, develop and operate an economic and efficient network.	<p>On behalf of Western Power we request that the wording of paragraphs 1,2 and 3 within the proposed policy AC-D6 be amended to reflect the statutory and legal obligation of Western Power to offer economic connections and to own, develop and operate an economic and efficient network.</p> <p>More generally we would ask that the Authority note that Western Power Distribution would normally seek to retain the position of electricity circuits operating at 132,000 Volts (132kV) and 66,000 Volts (66kV) and in some cases 33,000 Volts (33kV), particularly if the diversion of such circuits placed a financial obligation on Western Power Distribution to either divert or underground them as any such obligation would go against the statutory and regulatory requirement on Western Power Distribution to operate an economic and efficient electricity distribution system.</p> <p>Western Power Distribution would generally expect developers of a site to pay to divert less strategic electricity</p>
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									circuits operating at 11,000 Volts (11kV) or below. This may include undergrounding some 11kV and low voltage overhead lines as necessary.
0065	0065/01	Mr David Latham Porlock Parish Council	Not Stated	Not Stated	Not Stated		2 Vision, Objectives and Strategic Priorities 2.3	Wording of paragraph "To provide...opportunities...for people from all backgrounds and abilities..."  Does "abilities" include disabled as this term does not appear in the plan?	The word "disabled" to appear where appropriate in the plan.
0065	0062/02	Mr David Latham Porlock Parish Council	Yes	Yes	No		CE-S5 - PRINCIPLES FOR THE CONVERSION OR STRUCTURAL ALTERATION OF EXISTING BUILDINGS	RE:- Use of traditional materials... It is our contention that in certain conditions, modern materials may be more appropriate/sustainable - for example use of thatch where damp conditions prevail.	Add to para 2. b)...construction principles, "unless more modern materials would be more sustainable", of...
0065	0065/03	Mr David Latham Porlock Parish Council	Yes	Yes	Yes		4 Conserving and Enhancing Exmoor 4.145	We are concerned at the policing of such a policy as signs seem to encroach on pavements restricting pedestrian access.	None, other than assurance that active review and enforcement will take place.
0065	0065/04	Mr David Latham Porlock Parish Council	Yes	Yes	No		AC-D3 - Parking Provision and Standards	Table 9.1 (Hotels C1) Parking of one car per 2 bedrooms is unrealistic in today's age. Where provision is not made, vehicles are forced to park in adjacent roads causing traffic flow problems.	All new hotel parking to be at a minimum of one space per bedroom.



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0065	0065/05	Mr David Latham Porlock Parish Council	Yes	Yes	Yes		2 Vision, Objectives and Strategic Priorities 2.3 Objective 18	We are particularly concerned that a reliable bus link is maintained with Lynmouth (Route 300).	We need certainty of service - this is a vital/popular tourist link (viz - walkers using coast path).
0066	0066/05	Mr Richard Briden	Not Stated	No	No		6.132-133	How can the policy [HC-D5] encourage custom/self build housing when they have to affordable and therefore have little or no resale value "not mortgageable because they have no resale value" Exmoor National Park Young Voice Report 2015.	Exemption for custom/self build from all principal and affordable housing conditions to encourage them.

0066	0066/01	Mr Richard Briden	No		No		8.37	<p>At a meeting I attended in the Tors Hotel with Chief Planning Inspector Steve Quartermain and David Wyborn [ENPA Head of Planning and Sustainable Development], Andrea Davis [ENPA Chairman] and 2 others regarding the Lyn Plan [Lynton &amp; Lynmouth Neighbourhood Plan], I put it to him that there could be a policy where any dwelling house were ever used as a 2nd home/holiday home, if submitted, the property would never ever be granted any future planning permissions whatsoever.</p> <p>Steve Quartermain said that such a policy was possible under an Article 4 directive.</p> <p>Therefore the planning authority can directly influence the use of existing open market homes as holiday cottages, but chooses not to.</p> <p>I have since been told by the planning authority that such a policy could not be included as this would not be possible as it would not comply with Human Rights Legislation, but at the same time Primary Residence conditions are included in the Local Plan which are considered by many others including the government Planning Minister as not complying with Human Rights Legislation.</p> <p>Greater use of planning restrictions to discourage second homes was echoed by Exmoor Young Voices Group at the ENPA Exmoor Consultative and Parish Forum in March 2015.</p>	To consult with the government Planning Minister on how the Human Rights Legislation relates to these policies to obtain a definitive answer.
0066	0066/02	Mr Richard Briden	Not Stated	Not Stated	No		7.9	Hotels, guesthouses, bed & breakfasts etc. are not going to offer greatest opportunities for employment in the future; far from it, tourism and in particular serviced accommodation for a number of years has been and continues to be in	To consult specifically with the tourism businesses as a sector, to detail with them the policies that will directly affect them and get their input.

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								<p>decline. This is highlighted in Lynton &amp; Lynmouth by a number of significant closures with other serviced accommodation providers reducing bed spaces.</p> <p>"Tourists in the UK choose increasingly to stay in holiday rentals rather than hotels or bed and breakfasts". LSE London Report 2014</p> <p>All accommodation, pubs, cafes, restaurants together account for 15.5% employment on Exmoor. The greatest opportunities for employment are in health and social care, which accounts for 10% of employment on Exmoor. 40% of people on Exmoor are retired and this estimated to increase by a further 10% to near 50% by just 2021, the highest proportion in the whole of the UK. National Housebuilding Federation 2015 Report.</p>	<p>To come up with some policies as to how the ENPA are going to tackle the time bomb of a rapidly increasing aging demographic.</p> <p>A retired population that are high net users of all health and public services while contributing little if anything to sustain the local economy, and this at a time when the cottage hospital and 3 care homes in Lynton &amp; Lynmouth have been allowed to close.</p>
0066	0066/03	Mr Richard Briden	No	Not Stated	No		6.87	<p>Will a potential buyer of principal residence housing be able to get a mortgage on such housing, if not principal residence housing will suffer the same fate as local affordable housing which are "not mortgageable because they have no resale value" Exmoor National Park Young Voice Report 2015.</p>	<p>To validate the policy provide documented evidence that 'market rate' mortgages are easily available for principal residence housing.</p>

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0066	0066/04	Mr Richard Briden	Not Stated	No	No		5.63-5.65	There is nothing about prioritising community renewable energy schemes and local communities benefitting from renewable energy.	A policy of community involvement to the significant benefit to the whole community.
0066	0066/06	Mr Richard Briden	Not Stated	No	No		Text Box page 133	For units 6-10, the National Park Authority will expect that a financial contribution will be provided towards the provision of local needs affordable housing in the National Park, but there no details of the financial contribution expected. It also states that the change of use of an existing building or the redevelopment of a vacant building will be expected to be principal residence housing which is putting a condition on a Written Ministerial statement.	Details of the financial contribution expected and written confirmation from the government Minister that principal residence housing conditions can be applied.

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0066	0066/07	Mr Richard Briden	Not Stated	No	No		HC-D1 - Conversions to Dwellings in Settlements	<p>HC-D1 states the intention will remain the provision of 100% affordable housing and only minimum number of principal residence market houses will be allowed to support the delivery of the required affordable housing.</p> <p>HC-D14 states that only additional units created will be principal residence housing and nothing about affordable housing.</p> <p>How is it equitable for example that Pixton Park that could be subdivided into tens of units, but that a bed and breakfast a mere fraction the size should have to provide affordable housing.</p>	<p>Subdivision of a property of similar size whether it be a dwelling or a dwelling that operates as a guesthouse, bed &amp; breakfast is the same. Any policy that applies to one should apply equally to both otherwise the policy is discriminatory.</p> <p>A policy based on all properties would be equitable. Any differentiations if at all should be based on the properties' sq metres and confined to properties above 1000 sq metres or to draw a distinction between guesthouses/bed &amp; breakfasts with resident owners, after all these are people's homes, and full-service commercially run, managed and staffed establishments. The former are in reality dwellings 12 months of the year, guesthouses/bed &amp; breakfasts for 6/7 months, and the reality is the season is getting shorter and shorter.</p>

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0066	0066/08	Mr Richard Briden	Not Stated	No	No		HC-D14 - Subdivisions of Existing Dwellings	<p>HC-D1 states the intention will remain the provision of 100% affordable housing and only minimum number of principal residence market houses will be allowed to support the delivery of the required affordable housing.</p> <p>HC-D14 states that only additional units created will be principal residence housing and nothing about affordable housing.</p> <p>How is it equitable for example that Pixton Park that could be subdivided into tens of units, but that a bed and breakfast a mere fraction the size should have to provide affordable housing.</p>	<p>Subdivision of a property of similar size whether it be a dwelling or a dwelling that operates as a guesthouse, bed &amp; breakfast is the same. Any policy that applies to one should apply equally to both otherwise the policy is discriminatory.</p> <p>A policy based on all properties would be equitable. Any differentiations if at all should be based on the properties' sq metres and confined to properties above 1000 sq metres or to draw a distinction between guesthouses/bed &amp; breakfasts with resident owners, after all these are people's homes, and full-service commercially run, managed and staffed establishments. The former are in reality dwellings 12 months of the year, guesthouses/bed &amp; breakfasts for 6/7 months, and the reality is the season is getting shorter and shorter.</p>

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0066	0066/09	Mr Richard Briden	Not Stated	No	No		RT-D3 - Safeguarding Serviced Accommodation	Guesthouses/bed & breakfasts are people homes as well, and it is also often their pension. Many run them for a few years and then retire. This policy obliges the owner to in effect put their home up for sale for 12 months, the home that they wish to live in retirement. This policy obliges them to enter into a contract that they have no intention of fulfilling. They have no intention of selling their home.	To draw a distinction between guesthouses/bed & breakfasts with resident owners, after all these are people's homes, and full-service commercially run, managed and staffed establishments. The former are in reality dwellings 12 months of the year, guesthouses/bed & breakfasts for 6/7 months, and the reality is the season is getting shorter and shorter.
0067	0067/01	The Crown Estate	Yes	Yes	No	Certain policies are not justified, certain policies are not effective, certain policies are not positively prepared, and there are inconsistencies with National Policy.	1 Introduction	The previous response to the Plan made the general observation that referring to other policies within policies may cause confusion, and that the NPA may be better off stating: 'proposals must accord with other relevant policies contained within the Plan'. This recommendation was not acknowledged and hence this general observation remains relevant in relation to the current iteration of the plan.	NPA may be better off stating: 'proposals must accord with other relevant policies contained within the Plan'.
0067	0067/02	The Crown Estate	Yes	Yes	No	See Crown Estate comment above	2 Vision, Objectives and Strategic Priorities	SOUND The Crown Estate remains generally supportive of the draft vision and objectives for Exmoor as set out in the consultation document. However, it remains important that all of the different elements are pursued in an integrated way.	

0067 0067/03	The Crown Estate	Yes	Yes	No	See Crown Estate comment above	GP1 - GENERAL POLICY: NATIONAL PARK PURPOSES AND SUSTAINABLE DEVELOPMENT	<p><b>SOUND</b> The policy is consistent with national policy</p> <p>To provide context, the plan cites The National Park Circular 2010, stating that the National Park Authorities’ primary responsibility is to “deliver their statutory purposes and in doing so, that they should ensure they are exemplars in achieving sustainable development, helping rural communities in particular to thrive”.</p> <p>Through previous consultation TCE have expressed their general support for this policy. However, at this stage it is important to reiterate that the National Planning Policy Framework (NPPF) states that the purpose of the planning system is ‘to contribute to the achievement of sustainable development’ and that this has three roles ‘economic, social and environmental’, which are ‘mutually dependent’. TCE’s previous response expressed the need to strike a balance between satisfying the overall purposes of the National Park (conserve and enhance the natural beauty, wildlife and heritage) and meeting the Park Authority’s duty of fostering the economic and social well-being of local communities.</p> <p>The need to balance these objectives is emphasised by the NPPF’s statement in Paragraph 28 that “Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development”. It is imperative that the plan balances the requirements of the Framework with delivering the statutory purposes of the National Park, so that the plan is consistent with national policy. This will ensure that the rural</p>	
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Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
								<p>communities within the park are able to prosper and in turn, contribute to the ongoing success and management of the park.</p> <p>This is of particular importance as the 'General Policies' of the plan are intended to apply to all development within Exmoor National Park and to be read in conjunction with all other policies in the Plan.</p>	

0067 0067/04	The Crown Estate	Yes	Yes	No	See Crown Estate comment above	GP3 - GENERAL POLICY: SPATIAL STRATEGY	<p>UN SOUND - In respect to the shortcomings of the settlement hierarchy, and the lack of clarity around the development proposals in the open countryside, TCE consider that General Policy 4 [3] is not sound. The policy is not positively prepared or effective in delivering cross-boundary strategic priorities.</p> <p>TCE understand the need for a spatial strategy and the decision to retain a settlement hierarchy under the emerging local plan. The categories set out within the hierarchy are as follows:</p> <ul style="list-style-type: none"> <li>• Local Service Centres</li> <li>• Villages</li> <li>• Porlock Weir</li> </ul> <p>The settlements listed under these categories are termed 'named settlements'. The remaining area of the land within the plan area is defined as 'open countryside'.</p> <p>However, the expressed criteria by which the 'named settlements' have been identified is rather vague, simply stating that they are smaller than Local Service Centres, comprising a 'number of services and facilities' and acting as a focal point for people living across Exmoor. A specific list of recognised services and facilities is not provided, nor is a critical number of these identified, for which a settlement ceases to be defined as a 'village' and not 'open countryside'. Consequently, the identification of these 'named settlements' seems somewhat arbitrary with preference expressed for some settlements over others of similar composition and equal merit for inclusion in the hierarchy.</p>	<p>The identification of these 'named settlements' seems somewhat arbitrary with preference expressed for some settlements over others of similar composition and equal merit for inclusion in the hierarchy. In order to be a sound policy, Withycombe should be included as a village.</p> <p>On development in the open countryside the policy should be worded as follows: 'Development within the National Park is considered to be acceptable in principle if it is otherwise in accordance with other specific policies within this plan and where it meets one or more of the following requirements: [List a) - h) as before]'</p> <p>Para 3.44: It is therefore suggested that specific reference be made to the self-build policy within these criterion in order to achieve consistency in the policies and for completeness in terms of the type of development that will be allowed.</p>
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							<p>Under the proposed settlement hierarchy, Luxborough and Roadwater are listed as villages, whilst the settlement of Withycombe is not and is thus deemed ‘open countryside’ under the plan. However, in many respects, a stronger case can be made for Withycombe’s inclusion in the settlement hierarchy. Census data reveal that its population is larger than Luxborough’s, and it also benefits from local facilities in the form of a Church, a Village Hall, and a well-served bus stop on the A39 which is the main trunk road connecting Taunton and Minehead. It is well connected to the settlement of Carhampton, lying just 1km away. West Somerset Council’s emerging Local Plan recognises Carhampton as a primary village and it provides a number of shops, businesses and other community facilities. Although the bulk of Withycombe’s built form lies in West Somerset, there is a section of the village that lies within the Exmoor National Park boundary. TCE assert that the settlement is worthy of inclusion as a ‘named settlement’ and that that its exclusion demonstrates that the proposed settlement hierarchy cannot be justified as the most appropriate strategy. Consequently, in order to be a sound policy, Withycombe should be included as a village.</p> <p>Regarding development in the open countryside, the plan allows for development, only 3.2.4 providing it is in accordance with other policies and under a specific set of circumstances listed in a) to h). It remains unclear whether development must meet one, or more or indeed any of these additional requirements. On this point we would like to repeat our previous suggestion that the policy should be worded as follows:</p>	
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								<p>‘Development within the National Park is considered to be acceptable in principle if it is otherwise in accordance with other specific policies within this plan and where it meets one or more of the following requirements: [List a) - h) as before]’</p> <p>TCE is generally supportive of the Council’s innovative approach to delivering rural housing through enabling self-build opportunities in the open countryside. There are likely to be many suitable sites within their land ownership and as such, TCE is well placed to assist in the delivery of this new policy. However, there appears to be an inherent conflict on this matter between General Policy 3. and paragraph 3.44. General Policy 3 states that the focus of new build development in the Open Countryside will be upon:          “Improving the sustainability of rural land-based businesses and enabling self-build opportunities for local affordable housing in sustainable locations.”</p> <p>Yet paragraph 3.44 states that development within the open countryside must be in accordance with other policies in the plan and specifically include development that is then listed under a set criterion from a) to h). Within these criteria, there is no mention of the Council’s self-build policy and hence it appears that no allowance for this type of development is made within this paragraph. It is therefore suggested that specific reference be made to the self-build policy within these criterion in order to achieve consistency in the policies and for completeness in terms of the type of development that will be allowed.</p>	
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Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
								TCE would like to reiterate their support for the decision not to define development boundaries, but rather to have a balanced judgement on the scale of development in relation to the existing settlement and take a “common sense” approach to where new development may be appropriate.	

0067 0067/05	The Crown Estate	Yes	Yes	No	See Crown Estate comment above	GP5 - GENERAL POLICY: SECURING PLANNING BENEFITS - PLANNING OBLIGATIONS	<p>UNSOUND - In its current state the policy cannot be deemed to be effective, as its vagueness gives the impression that this will be delivered on an ad hoc basis with little solid guidance provided on how the policy will be delivered. Whilst TCE acknowledge the LPA's difficulties in forming this policy, it does not appear that the potential for a cross-boundary approach has been explored to deliver this policy. Consequently, TCE consider that the policy must be considered not sound.</p> <p>TCE remain supportive of Policy GP5 and are pleased that previous feedback on the policy appears to have been acknowledged by the LPA. However, aspects of the practical workings of this policy remain unclear, particularly in relation to the Community Infrastructure Levy (CIL).</p> <p>TCE were pleased to learn that the recently published (June 2015) Infrastructure Delivery Plan (IDP) has incorporated the recommendations of their previous feedback, as the plan is now considered to be an 'evolving document' in response to changing circumstances.</p> <p>Although the IDP sets out the specific infrastructure requirements for the National Park, the mechanisms for meeting these is still rather unclear. In light of the limited level and scale of development in the National Park, and because much of the local infrastructure is owned and/or managed by other local authorities, the document states that the LPA will need to work with partners to periodically review its position on the CIL and its impacts upon the viability of development. Whilst this would allow the policy to respond to prevailing circumstances, it</p>	
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Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
								<p>provides little assurance to developers with regards to the type of development that would require a CIL payment and the level of the charge that would be incurred.</p> <p>Hence at this point, it is necessary to repeat the need for a charging schedule, which would allow developers to formulate a more accurate assessment of the viability of developments within the park.</p>	
0067	0067/06	The Crown Estate	Yes	Yes	No	See Crown Estate comment above	CE-D3 - Conserving Heritage Assets	<p>SOUND - The approach is justified in its consideration of the viability of these assets and is in accordance with National Policy as set-out in the NPPF.</p> <p>TCE are the owners of many listed and unlisted heritage assets of cultural and historic value. They are keen to preserve and safeguard the integrity of these buildings but the inherent costs which this incurs can often present a barrier their ongoing viability. Therefore, TCE welcome the approach taken by the ENPA in promoting a positive strategy to their conservation, which is expressed as follows:                      “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”</p>	

0067	0067/07	The Crown Estate	Yes	Yes	No	See Crown Estate comment above	CE-S5 - PRINCIPLES FOR THE CONVERSION OR STRUCTURAL ALTERATION OF EXISTING BUILDINGS	<p>UNSOUND - In light of the below-cited policy and guidance, it is deemed that the restrictions presently placed upon the conversion of traditional buildings (and in particular, agricultural buildings) are too strict and would likely stifle development that would allow for the preservation and enhancement of traditional buildings and the rural landscape. The policy is therefore inconsistent with national policy.</p> <p>In addition to its ownership of many listed buildings, TCE is also a substantial owner of traditional, rural buildings, which while not listed, clearly have historic value. Under the terms of the framework these buildings should be considered as non-designated heritage assets. It is important that the long term viability of these buildings is secured so that they can be appreciated long into the future. Often the only way of achieving this is through conversion an alternative use.</p> <p>The plan states that the conversion will be permitted where the proposal accords with the relevant policies of the plan in terms of its intended use. The most significant policy that proposals must address here is HC-D7 'Conversions to dwellings in the open countryside'. Issues relating to this policy will be addressed later in this document. However, it is felt that by requiring that proposals must conform to this policy (in its current state), the NPA is placing a great restriction on potential solutions to retaining these buildings through a new and viable use. If policy HC-D7 is to remain unaltered, then it is recommended that the requirements of Policy CE-S5 be relaxed to allow the principle of their conversion to be considered as a means to</p>	It is recommended that the requirements of Policy CE-S5 be relaxed to allow the principle of their conversion to be considered as a means to preserving the distinctive landscape and heritage of the national park.
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Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
								<p>preserving the distinctive landscape and heritage of the national park.</p> <p>Such an approach would be in line with paragraph 55 of the NPPF, which states that isolated homes in the countryside should be avoided unless there are “special circumstances such as where the development would re-use redundant or disused buildings and lead to an enhancement to the immediate setting”. Indeed, it has been well documented that structural changes to the farming industry over the past 100 years have resulted in many of Exmoor’s traditional buildings becoming redundant and a relaxation of this policy would allow these to be better retained into the future.</p>	

0067	0067/08	The Crown Estate	Yes	Yes	No	See Crown Estate comment above	CC-S6 - WASTE MANAGEMENT	<p>UN SOUND - As renewable and low carbon energy is to be encouraged in accordance with the NPPF's instruction under paragraph 97 that LPAs should have a "positive strategy to promote energy from renewable and low carbon sources", TCE contend that the policy is not consistent with national planning policy and has not been positively prepared to achieve sustainable development.</p> <p>Through previous consultation, TCE expressed the view that restricting the allowable sources of waste to that which is derived only locally, was to render the entire concept of Anaerobic Digestion unworkable. This requirement endures under the publication draft of the plan and it is our assertion that the policy will restrict the viability of implementing such schemes. Indeed the requirement to only source local feedstock and waste demonstrates a lack of understanding of the deployment of this energy source and results in a policy that will not be effective in delivering the strategic planning priorities within Exmoor and beyond. The policy also fails to recognise that changing conditions, for example in the availability of waste or a future fall in electricity costs may also affect viability and therefore, the requirement for local sourcing will restrict the ability of the AD plant's owners to respond to such change. In any case, the policy will be very difficult to manage and enforce in practice and cannot be deemed an appropriate condition.</p>	Restricting the allowable sources of waste to that which is derived only locally, is to render the entire concept of Anaerobic Digestion unworkable and it is our assertion that the policy will restrict the viability of implementing such schemes.
0067	0067/09	The Crown Estate	Yes	Yes	No	See Crown Estate comment above	HC-S1 - HOUSING	<p>UN SOUND - Although the policy is deemed to have been positively prepared to meet the identified local need, there are concerns that it will not be deliverable and must therefore be considered unsound.</p>	Where market housing (though still tied as 'Principal housing') is allowed it could facilitate the provision of affordable units as a form of cross-subsidy. TCE

								<p>The Crown Estate acknowledges that the local housing market within Exmoor does not reflect the income of those living and working locally. The current situation is both socially and economically unsustainable, with lower paid workers often forced to commute into the district and with local people unable to find homes close to the family and friends they grew up with. A lack of affordable housing weakens community networks and makes access to essential services more difficult.</p> <p>With many households still in need of affordable housing The Crown Estate accepts that the provision of affordable homes should remain a priority over the coming years. At present planning policy in Exmoor requires all new build housing developments to be affordable in order to meet local needs. Although the aim of this policy has been to increase the supply of affordable housing, it does not take account of issues surrounding the financial viability of such schemes.</p> <p>Where market housing (though still tied as 'Principal housing') is allowed it could facilitate the provision of affordable units as a form of cross-subsidy. TCE would encourage the NPA to look further at a proportion of non-affordable housing to be provided, where required, to achieve a viable development scheme. In this way, developments that might otherwise be unviable and thus undeliverable under current planning policy restrictions would be able to fund the affordable housing element of the scheme through cross subsidy. The same argument</p>	<p>would encourage the NPA to look further at a proportion of non-affordable housing to be provided, where required, to achieve a viable development scheme. In this way, developments that might otherwise be unviable and thus undeliverable under current planning policy restrictions would be able to fund the affordable housing element of the scheme through cross subsidy. The same argument applies to the development of self-build housing and the absence of any mention of this within this section of the plan must be considered a significant omission.</p>
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Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
								applies to the development of self-build housing and the absence of any mention of this within this section of the plan must be considered a significant omission.	

Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
0067	0067/10	The Crown Estate	Yes	Yes	No	See Crown Estate comment above	HC-S3 - LOCAL OCCUPANCY CRITERIA	<p>SOUND - The policy is positively prepared and its effectiveness can be satisfactorily monitored and adjusted to ensure its deliverability.</p> <p>The above policy is aimed at ensuring that housing provision can meet local needs and not contribute to the large proportion of holiday/second homes within the Park, and prevent the over-inflation of housing prices due to wealthy retirees migrating to the area. TCE commend the approach adopted by the authority.</p> <p>The only reservations The Crown Estate has is if there are no local persons satisfying the criteria the property may remain empty and unoccupied. They appreciate the concession made in paragraph 6.83 to then extend the occupancy cascade to local persons with a minimum 5 years of permanent and continuous residence in the parish or adjoining parish or with strong local ties to the relevant district council area of the National Park, or the National Park as a whole, but recommend that this policy is monitored for its effectiveness to ensure that it does not result in unoccupied dwellings, which would go against its intended purpose.</p>	Recommend that this policy is monitored for its effectiveness to ensure that it does not result in unoccupied dwellings, which would go against its intended purpose.

Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
0067	0067/11	The Crown Estate	Yes	Yes	No	See Crown Estate comment above	HC-S4 - PRINCIPAL RESIDENCE HOUSING	<p>SOUND - The policy is positively prepared to assist increasing the affordability of local housing and is justified in its approach.</p> <p>As has been previously outlined in this response, TCE is supportive of the NPA's aims to reduce the number of holiday/second homes to allow the housing market to more adequately meet the needs of the local residents. The policy also ensures that there is a knock-on economic benefit from having more full-time residents within the Park and contributing to the local economy.</p>	

Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
0067	0067/12	The Crown Estate	Yes	Yes	No	See Crown Estate comment above	HC-D2 - New Build Dwellings in Settlements	<p>SOUND - The policy has been positively prepared and presents a viable solution to meeting local housing need.</p> <p>TCE acknowledges that there is a significant shortfall in the supply of affordable homes across Exmoor and is pleased to see that the provision of affordable housing continues to be a priority for the NPA. To address this issue will require a concerted effort from all those involved in house building and so TCE welcome the policy which states that all new residential development will be expected to contribute towards the provision of affordable housing. It is however essential that affordable housing policy requirements give due consideration to development viability as well as need. In this regard TCE appreciates the inclusion of point 2 which explains that a minimum amount of market housing will be permitted in order to allow development to be viable in terms of delivering affordable units.</p> <p>This approach will ensure that developments, which might otherwise be unviable and undeliverable will be able to fund the affordable housing element of the scheme through cross subsidy. Previous arguments in relation to housing previously made still stand.</p>	

0067 0067/13	The Crown Estate	Yes	Yes	No	See Crown Estate comment above	HC-D5 - Custom/Self Build Local Need Housing in Rural Communities	<p>UNSOUND - TCE accept the requirement for these homes to have a local occupancy tie, and recognise this as a practical way to satisfying local need. However, it is felt that the condition that these must be solely affordable units is too restrictive and does not present a realistic opportunity for the delivery of affordable housing. It is suggested that this requirement be removed, with an alternative solution sought to allow for the delivery of affordable housing at another site. This will allow for increased flexibility in terms of design, which would uphold the attractiveness of pursuing a self-build project and maintain the viability of the policy. As the policy is not presently deemed to be deliverable as a means of meeting an objectively assessed housing need, it must be considered unsound.</p> <p>The stipulation for only affordable housing has been extended to the Authority's self-build policy. This will likely impact upon the financial viability and attractiveness of such schemes due to the decreased value of the asset that will result from the process. In turn, this may also restrict potential self-builders from accessing the credit required to complete a build, thus reducing the pool of local people that may wish to pursue a self-build opportunity.</p> <p>In addition to this financial aspect, the personal incentive to undertaking a self-build will also be reduced as it may prohibit individuals from pursuing a specific design or house type that they would like, which is one of the fundamental appeals of self-building. The combination of these factors is likely to limit the success of this scheme and result in a missed opportunity to deliver an</p>	It is felt that the condition that these must be solely affordable units is too restrictive and does not present a realistic opportunity for the delivery of affordable housing. It is suggested that this requirement be removed, with an alternative solution sought to allow for the delivery of affordable housing at another site.
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Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
								innovative, local solution for the provision of rural housing.	

0067 0067/14	The Crown Estate	Yes	Yes	No	See Crown Estate comment above	HC-D7 - Conversions to Dwellings in the Open Countryside	<p>UNSOUND- The policy is not in accordance with National Planning Policy.</p> <p>The inherent costs involved in converting a traditional building will usually mean that a conversion to an affordable home is unviable. TCE is therefore pleased to see that the National Park Authority now recognises that there are some circumstances whereby affordable housing may not be appropriate or achievable, but where allowing the conversion of the building could bring other benefits. Furthermore allowing a proportion of residential conversions to non-affordable dwellings could fund the provision of affordable dwellings elsewhere on the site through cross subsidy or through the provision of developer contributions towards affordable housing in other areas of the National Park.</p> <p>Rather than simply viewing residential conversions to market housing as a missed opportunity for affordable housing the National Park Authority should recognise the economic benefits associated with such conversion schemes. Residential conversions provide the basis for a broad spectrum of enterprises that do not require commercial or industrial facilities or infrastructure as required by the planning system. With improving access to broadband, there is considerable evidence from national and regional research that home-working is growing in terms of its potential for rural communities and economies.</p> <p>The conversion and re-use of rural buildings is an inherently sustainable method of development as it is far less intrusive to adapt, and where</p>	<p>Whilst it is acknowledged that this policy also deals with non-residential buildings in the open countryside that are not necessarily redundant or disused, TCE feels that there should be a criterion within the policy which allows for development along these lines. This would open up opportunities for economic activity on live-work basis and would help support the rural economy. It would also bring the policy in line with national policy.</p>
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Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
								necessary rebuild in part, an existing building than it is to introduce an entirely new building. This is especially the case within the National Park where the aim is to conserve or enhance the landscape setting. Such schemes are an excellent way of making the most efficient use of existing resources and reducing pressure of greenfield land and can make an important contribution to rural communities by providing new homes and economic opportunities for local people.	
0067	0067/15	The Crown Estate	Yes	Yes	No	See Crown Estate comment above	HC-D10 - Succession Farming – Second Dwellings on Established Farms	<p>UNSOUND - TCE are concerned that the policy will not be effective in delivering its primary objective.</p> <p>The Crown Estate is supportive of this policy in principle but would caution that in most cases it is likely to prove to be financially unviable without some form of cross subsidy. Such a scheme is therefore more likely to be successful if one or more other buildings on the farmstead were converted for market housing which could then fund the dwelling for the retired farm worker.</p>	

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0067	0067/16	The Crown Estate	Yes	Yes	No	See Crown Estate comment above	SE-S1 - A SUSTAINABLE EXMOOR ECONOMY	<p>SOUND - The proposal is consistent with national policy.</p> <p>TCE are generally supportive of the policy and are encouraged by the support outlined for home-based employment opportunities. We are also pleased to see that the policy has been made more succinct and that the amended wording has provided greater clarity on the acceptability of proposals.</p> <p>We would however, like to stress the importance of communicating to applicants, the likely constraints in terms of scale and intensity that may restrict potential further growth of a given business or enterprise. This will provide greater certainty and confidence to applicants looking to pursue business ventures within the park, which in turn, will support sustainable economic growth and economic activity within its boundary.</p>	

0067 0067/17	The Crown Estate	Yes	Yes	No	See Crown Estate comment above	SE-S3 - BUSINESS DEVELOPMENT IN THE OPEN COUNTRYSIDE	<p>UNSOUND - The plan is not positively prepared to meet the economic needs of the area, nor is it justified when considered against alternative solutions.</p> <p>TCE wish to make the following remarks to encourage ENPA to amend the policy so that it is less restrictive to the type of business that is permitted in such locations:</p> <p>Given the obvious rural nature of the National Park it is perhaps unsuitable to constrain new build development to be solely within local service centres and villages. The on-going decline in employment within agriculture has meant much of the local population and those that live in these rural communities are having to travel long distances to reach their places of work which are generally outside of the National Park, within larger settlements. Not only is this unsustainable but it also means that life for rural communities is affected by a downward spiral in terms of economic activity and an increasing change from formerly vibrant rural communities to dormitory settlements providing increasingly expensive housing for non-local house purchasers.</p> <p>Strong rural communities offer those living in rural areas better opportunities to work in their local community. They help reduce the level of out-migration of young people and retain skilled young people by providing more and better quality local employment opportunities. Being able to live and work in the same settlement, or at least close by, will also have sustainability advantages as it will reduce the need for people</p>	TCE would encourage the NPA to consider what material and demonstrable harm would come from locating or relocating a business to an existing building – albeit one not well related to other built form, or part of a farm group or hamlet – when it could bring considerable economic benefit to the local population and help retain a balanced and mixed population.
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								<p>to travel long distances to their place of work.</p> <p>Criteria 4 of this policy states; ‘The erection of new business premises or business use in buildings which stand alone or which do not relate well to existing buildings and are not part of a farm group or hamlet will not be permitted.’ TCE would argue that businesses that are viable within the rural setting of the Park and which satisfy all other policies contained within the plan should not be constrained in this way. There may be circumstances where a location, which is well suited and screened, is appropriate for new build development – or indeed already has an existing building/s which are suitable for business use but not related to other built form.</p> <p>TCE would encourage the NPA to consider what material and demonstrable harm would come from locating or relocating a business to an existing building – albeit one not well related to other built form, or part of a farm group or hamlet – when it could bring considerable economic benefit to the local population and help retain a balanced and mixed population.</p> <p>TCE oversees many farms and agricultural tenants and is therefore fully aware of the difficulties experienced by traditional farming enterprises within and surrounding the National Park. The lack of stability in incomes and the problems experienced by farmers in recent years has caused many to either leave the business completely, or to seek additional and supplementary income from diversifying. Farm diversification has become an important part of the rural economy in a number of ways; it allows</p>	
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Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
								<p>farms that would otherwise have had to go bankrupt or sell-up to continue farming with these businesses as a form of subsidy, it also stimulates the rural economy and helps to create additional jobs for local residents. Diversifying allows them peace of mind that they are not reliant on a single, inconsistent and unreliable source of income.</p> <p>There are examples of successful rural businesses, borne out of necessity, where farm diversification has brought new life to an existing farming enterprise. In these cases there is a need to understand and appreciate their value to the local economy and to foster appropriate further growth and development to build upon that success.</p>	

0067 0067/18	The Crown Estate	Yes	Yes	No	See Crown Estate comment above	SE-D1 - Home Based Businesses	<p>UNSOUND - The policy is not positively prepared to meet the objectively assessed development needs and is inconsistent with National Policy.</p> <p>The TCE are disappointed to see that the NPA has chosen to have a home working policy that is so limited in scope. The Local Planning Authority has given no consideration to the possibility of converting existing buildings to a live/work arrangement and makes an almost token reference to new build live/work schemes, merely stating that:          “Proposals for live-work units should be in accordance with the housing policies in this Plan.”          As such, the benefits of live-work units are held in no higher regard than purely domestic dwellings, showing that the NPA has failed recognise the additional benefits that these can bring in terms of supporting the rural economy and the delivery of affordable housing. Indeed, where viable, such proposals could provide affordable housing and/or could be tied as a ‘Principal residence’.          Therefore, TCE assert that this policy has missed an opportunity to help meet and the development needs of the area and is inconsistent with the NPPF.</p> <p>The approach taken in SE-D1 fails to recognise the importance of key changes taking place in the way we live and work. For example it does not take account of the fact that a growing number of people are now working from home, particularly in rural areas. In fact according to the 2001 census 31% of people in Exmoor work from home, this is a significantly greater percentage than the national average. This suggests that consideration should be given to the issue of home working and</p>	<p>This type of development is specifically supported within paragraph 21 of the Framework which states that local planning authorities should “facilitate flexible working practices such as the integration of residential and commercial space within the same unit”. The NPA must therefore extend policy SE-D1 to support this form of development [live/work] within Local Plan in order to make it sound.</p>
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								<p>live work units when forming those planning policies that will shape the future of the National Park. This could be particularly important in those villages that are more remote and have more restricted local employment opportunities.</p> <p>Fuelled by the impact of new technology (such as improved internet access in rural areas), a growing frustration with the stress and time wasting associated with the daily commute and a desire for a better work/life balance, self-employed people in rural areas are increasingly choosing to opt for home-working. In fact this is now a well established trend. TCE own a significant number of traditional buildings which are well suited to providing this type of live-work arrangement. The conversion of rural buildings to establish a live-work arrangement offers a wide range of benefits, not only to individuals and their businesses, but also to the wider economy and environment as well.</p> <p>In November 2010 the Trade Union Congress (TUC) published an analysis of average commuting times in the UK. This analysis found that the average time spent commuting to and from work increased year on year from 1998 to 2006 when it reached a peak of 52 minutes 36 seconds per day. Since 2006 however average commute times have decreased every year and at the time these findings were published the average commute time stood at 47 minutes 48 seconds per day.</p> <p>The TUC attributes this gradual reduction in commuting times partly to the growth in home working. Between 2006-2008 the number of</p>	
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							<p>people working from home increased by 291,000 which actually accounted for more than half of employment growth during this time period.</p> <p>With approximately 25 million people in the UK commuting to work, it is estimated that commuting costs approximately £337 million of potential work time every day. Therefore one opportunity to help rural businesses deliver far more for the local economy is through the promotion and enabling of home-based work. The table below shows that a greater proportion of people in Devon work “mainly at or from home” than in the south west region and England as a whole. Home working is therefore clearly a highly significant factor in the local economy and is a trend that the NPA should support.</p> <p>Over recent years the principle of live-work units within the countryside has become more acceptable as a means of promoting the sustainable re-use of existing buildings. Such schemes are inherently sustainable as they help to meet local demand for housing (socially sustainable) and they provide local employment opportunities (economically sustainable). They also serve to reduce the need to travel by car and safeguard the character and appearance of traditional buildings (environmentally sustainable).</p>	
0067	0067/19	The Crown Estate	Yes	Yes	No	See Crown Estate comment above	<p>RT-S1 - RECREATION AND TOURISM</p> <p>UNSOUND- The policy is not deemed effective due to the lack of clarity around certain terms, which tend to suggest that certain activities will not be permissible.</p> <p>One of the two statutory purposes of the National Park designations is ‘to promote opportunities for</p>	

								<p>the understanding and enjoyment of its special qualities by the public’. Much of this is done through recreation and tourism activities. Exmoor National Park has long been a popular tourist destination which provides a significant contribution to the Exmoor economy, providing enormous benefits to local businesses both directly and indirectly. Furthermore tourist related developments help to underpin the quality of the local environment and facilitate enjoyment of it both by local people and visitors alike.</p> <p>The Crown Estate is working hard to develop and enhance the tourism industry in Exmoor with the aim of increasing public awareness and the enjoyment of the National Park. An example of the good work carried out by The Crown Estate in this regard can be seen at Dunster Forest (see previous submission for more details). This has promoted Dunster as a ‘gateway’ to the forest and has led to significant benefits for local businesses in the village.</p> <p>It is the aspiration of The Crown Estate to continue, where appropriate, to attract new forest based tourism activity. The above policy provides some scope for them to do this, however, they are concerned at the emphasis placed on the ‘quiet enjoyment’ and ‘experience of tranquillity’ within the policy. The policy also requires locations of recreation, tourism and environmental education to be in accordance with the Spatial Strategy and other policies in the plan. This policy gives the impression that any activity within the national park that does not fall within this ‘quiet and tranquil’ category will be</p>	
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								<p>refused. How would the NPA categorise developments? Would the normal noise and disturbance restrictions not be sufficient in this instance? An activity, especially physically demanding or exhilarating activities, could be conducted with no noise at all, and yet people participating may not consider it to be truly 'tranquil'.</p> <p>The NPA must therefore look more closely at this issue and define its terms. It is also urged to consider the economic benefit of these tourist activities and realise that many recreational developments, such as the Dunster Forest scheme which The Crown Estate has promoted, brings benefits for local people and allows them increased access and enjoyment of the Park which further improves their health and wellbeing. The National Park Authority is therefore encouraged to support the work that The Crown Estate, and indeed others are doing to promote Exmoor as a popular destination.</p>	
0067	0067/20	The Crown Estate	Yes	Yes	No	See Crown Estate comment above	RT-D5 - Tented Camp Sites	SOUND - The policy promotes the rural economy and is thus consistent with national planning policy.	

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0067	0067/21	The Crown Estate	Yes	Yes	No	See Crown Estate comment above	RT-D6 - Camping Barns	SOUND - The policy promotes the rural economy and is thus consistent with national planning policy.	
0067	0067/22	The Crown Estate	Yes	Yes	No	See Crown Estate comment above	RT-D9 - Alternative Camping Accommodation	<p>SOUND - The policy promotes the rural economy and is thus consistent with national planning policy.</p> <p>TCE is supportive of the approach taken by Exmoor NPA in providing tented camp sites, camping barns and alternative camping accommodation. As the above response indicates TCE is a significant supporter of tourism within the Park and has a number of sites and traditional barns which would be suitable for providing accommodation of this type.</p> <p>TCE is also pleased to see that alternative accommodation (RT-D9) has been given more flexibility than the traditional camping sites allowing for low impact proposals to be managed in a way that ensure the economic benefit of bringing tourists to the area without endangering the landscape of amenity of the Park.</p>	

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0067	0067/23	The Crown Estate	Yes	Yes	No	See Crown Estate comment above	RT-D10 - Recreational Development	<p>SOUND - The policy is justified in its consideration of reasonable alternatives to the policy.</p> <p>TCE is supportive of the above policy and are pleased to see that, where appropriate and where it can demonstrated to be appropriate, development can be located outside of local service centres and villages. TCE recognises that whilst tourist development should be appropriate and sustainable, due to the nature of the Park many of the attractions and recreational facilities are not suitable to location in the more built up areas.</p>	

0068	0068/01	Mr James Shorten Geo	Not Stated	Not Stated	No		Vision 5 - page 9	<p>The English National Parks and the Broads UK Government Vision and Circular 2010 states at paragraph 28. that:                  The Authorities’ primary responsibility is to deliver their statutory purposes. In doing so, they should ensure they are exemplars in achieving sustainable development, helping rural communities in particular to thrive. Such models can offer wider application to other areas beyond the Park boundaries, and Authorities are encouraged to disseminate their experience to other rural authorities.                  This sentiment is picked up in the Plan under the Vision For Exmoor National Park to 2031 under heading 5. We are closer to achieving a carbon-neutral National Park to help mitigate climate change, and have introduced measures to adapt to changes in climate that are already happening, which goes on to state:                  Since Exmoor is an exemplar for sustainable development, it has inspired local communities and visitors to live within environmental limits and to play their part in working towards a carbon- neutral National Park and more sustainable lifestyles increasing energy efficiency to help tackle and adapt to climate change. Appropriate renewable energy technologies, are in place and these are located, designed and at a scale to conserve Exmoor National Park’s landscape and wildlife with areas, including its skylines and open expanses, remaining free of them. Exmoor’s communities have found ways of reducing and reusing waste, and have access to recycling facilities.. Together with sustainable agriculture, low carbon transport and travel, sustainable living is becoming the norm.                  We are concerned that this sets a false starting</p>	<p>We do not suggest for a moment that the Plan should abandon its aspirations for exemplars of sustainable development, but the assumption that this is already happening is unsubstantiated and illusory, which is not how policy should be founded. Instead the aspiration should be directed to new policy approaches which may realise the change needed. Behind the notion of exemplars is the need to break new ground. Whist is may be the case that significant progress has been made in the Park, the Plan should not be complacent about what is still to do, and the step change in the nature of new development which may be needed to achieve meaningful results. This a shared task with all rural areas, but exemplars are expected to provide insight and leadership. Key to this is the importance of sustainable development solutions being responsive to differing situations in the Park, which is not a homogeneous place, and so in turn of value to other places too as the Circular envisages.</p>
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								<p>point for the Plan. Whilst that local communities and visitors should live within environmental limits is an objective we share, and one which is ultimately fundamental to sustainable development, we know of no evidence that this is actually happening in the Park as the Plan appears to suggest. The potential for and availability of sustainable options does not equate to their uptake and use. Choice and behaviour are the keys to sustainability outcomes and there is nowhere in the UK where 'sustainable living is becoming the norm'. Environmental footprints are around twice as high as is truly sustainable on average, and this is worse in rural areas where sustainable transport use is difficult and so rare and domestic energy use typically higher.</p>	



0068	0068/02	Mr James Shorten Geo	Not Stated	Not Stated	No		6.147	<p>The purpose of including paragraph 6.147 is not clear. Whilst introducing the potential relevance of 'Low Impact' or 'One Planet Development' to Exmoor the statement that they 'will be considered in terms of whether they are in accordance with the policies in this plan. These include the Spatial Strategy (Policy GP3), housing, landscape character and design policies.', as well as being a statement of the obvious, also appears incongruous with its appearance in the section of the Plan dealing with rural workers and succession farm dwellings.</p> <p>One Planet Development (OPD) is policy for the whole of Wales, found Planning Policy Wales, Technical Advice Note 6 and is the subject of the detailed Open Countryside One Planet Development Practice Guidance. OPD is described is summarised as follows:                  One Planet Development is development that through its low impact either enhances or does not significantly diminish environmental quality. One Planet Development is potentially an exemplar type of sustainable development. One Planet Developments should initially achieve an ecological footprint of 2.4 global hectares per person or less in terms of consumption and demonstrate clear potential to move towards 1.88 global hectare target over time. They should also be zero carbon in both construction and use. (TAN 6, 4.15.1)</p> <p>Open Countryside One Planet Development (OCOPD) is a particular type of OPD where an open countryside location is utilised for a land- and subsistence-based livelihood whereby the majority of resident's needs (food, energy, water</p>	<p>Whilst it is welcome that the draft Local Plan introduces the LID and OCOPD to Exmoor, that it then simply refers them to 'the policies in this plan' is wholly inadequate and in apparent ignorance and contradiction of that we know about examples of and policies for LID and OCOPD elsewhere. It is also curious if not confusing that this reference occurs in the rural workers and succession farm dwellings section of the Plan. Is this policy intended to be of specific relevance to LID and OCOPD or not? In Wales and On Dartmoor the clear conclusion is that although superficially similar they are not the same thing, and this separate policy is required. The same must be true for Exmoor and separate policy should be included in the Plan drawing on the existing established and successful policies.</p> <p>In many ways Exmoor is very similar to south west Wales, where the majority of OCOPDs have been permitted to date – a sparsely populated landscape struggling to become truly sustainable, where small pockets of specifically highly sustainable development can</p>
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								<p>etc.) are met from the site and therefore they are able to achieve a greatly reduced environmental footprint, and so contribute directly and strongly to sustainable development. Living on site is an intrinsic part of OCOPD, however dwellings must be of exceptionally low environmental impact also, and capable of and are required to be removed should the use of the site as an OCOPD cease. OCOPDs are governed by detailed and binding management plans, with annual performance monitoring.</p> <p>Pembrokeshire Coast National Park has its own specific policy and guidance for OCOPD, interpreting how the statutory designation affects its implementation. Dartmoor National Park also has Policy for 'Low Impact Residential Development in the Open Countryside', which is broadly similar to the Pembrokeshire Coast National Park policy.</p> <p>OCOPD is proving to be a success story in Wales, with the number of consents being given now rising and more mature established OCOPDs showing themselves as capable of achieving very low environmental footprints, strong landscape and ecological benefits, and harmonious and beneficial relationships with local communities.</p> <p>Thus what we know about Low Impact Development (LID) and OCOPD is that they can genuinely make strong contributions to rural sustainability, are compatible with National Park Locations, and because of the unusual nature of the development, require specific planning policies (and guidance) in order for applications</p>	<p>make a tangible and welcome difference.</p>
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								for them to be properly understood and determined.	

0069	0069/01	Joe Keech Devon County Council	Not Stated	Not Stated	Not Stated	<p>Thank you for the opportunity to comment in the Publication Draft of the Exmoor National Park Local Plan (2011-2031). I can confirm that the County Council has no issues or concerns that affect the overall soundness of the plan.</p> <p>Overall, the County Council is broadly supportive of the Local Plan contents. The attached schedule details some comments on various aspects of the plan that we suggest would benefit from review before submission.</p>	<p>GP5 - GENERAL POLICY: SECURING PLANNING BENEFITS - PLANNING OBLIGATIONS</p>	<p>Education Requirements</p> <p>There are three primary schools that are situated within Exmoor National Park, namely Combe Martin Primary School, Lynton Church of England Primary School and Parracombe Church of England Primary School.</p> <p>Forecast data suggests that Combe Martin Primary School is projected to be nearing capacity over the next few years. Contributions towards education provision may need to be sought if any significant growth is proposed within the catchment of the school. By contrast, Lynton and Parracombe Primary Schools have low pupil numbers with plenty of capacity to absorb any local growth from housing development. In particular, Parracombe Primary School is one of the smallest schools in Devon and forecast data shows very low numbers of pre-school children living in the area.</p> <p>Any development within Exmoor National Park that falls within Devon County Council's (DCC's) boundary will have an impact on home to school transport costs. School transport costs will therefore be requested to mitigate the impact of development as these costs are not provided for by central government.</p> <p>Libraries:</p> <p>There is only one public library within Exmoor National Park which is situated at Lynton (identified as a 'community facility' within the plan).</p> <p>Although, as is the case throughout the Plan, there is no allocated development within or</p>	
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								surrounding Lynton, if there were to be a significant increase to the catchment population of the library, then DCC would review whether the library could meet the increased need. If a significant need would arise from housing development within or around Lynton, developer contributions may be sought towards library provision, although this is considered unlikely to occur as it is understood that small scale developments and affordable housing are the development types which may be anticipated in the area.	
0069	0069/02	Joe Keech Devon County Council	Not Stated	Not Stated	Not Stated	See DCC Comment above	6.200	It is agreed that a criteria based policy is an appropriate approach to Gypsy and Traveller site provision due to the lack of demonstrable need for permanent or transit pitches within the National Park.	
0069	0069/03	Joe Keech Devon County Council	Not Stated	Not Stated	Not Stated	See DCC Comment above	HC-S5 - TRAVELLING COMMUNITIES	The policy stance allows for the appropriate provision of small encampments should the need arise within the plan period whilst protecting the important character of the National Park. As such it is considered reasonable.	
0069	0069/04	Joe Keech Devon County Council	Not Stated	Not Stated	Not Stated	See DCC Comment above	1 Introduction Duty to Cooperate	It is considered that the Local Plan has been produced in co-operation with DCC and takes appropriate account of cross-boundary issues.	

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0069	0069/05	Joe Keech Devon County Council	Not Stated	Not Stated	Not Stated	See DCC Comment above	CE-S7 - SMALL SCALE WORKING OR RE-WORKING FOR BUILDING AND ROOFING STONE	The positive approach to small-scale working for building stone in policy CE-S7 is supported and is consistent with the approach of the emerging Devon Minerals Plan. The proposal to safeguard potential sources of building stone in policy CE-S8 is also supported.	
0069	0069/06	Joe Keech Devon County Council	Not Stated	Not Stated	Not Stated	See DCC Comment above	CE-S8 - MINERALS SAFEGUARDING AREAS	The positive approach to small-scale working for building stone in policy CE-S7 is supported and is consistent with the approach of the emerging Devon Minerals Plan. The proposal to safeguard potential sources of building stone in policy CE-S8 is also supported.	
0069	0069/07	Joe Keech Devon County Council	Not Stated	Not Stated	Not Stated	See DCC Comment above	CE-S9 - MAJOR MINERAL EXTRACTION	DCC agrees with the approach taken to major mineral extraction within this policy. This reflects national policy and is consistent with the position taken within the emerging Devon Minerals Plan that there is no reliance in Devon for new mineral resources to be developed within the National Parks.	
0069	0069/08	Joe Keech Devon County Council	Not Stated	Not Stated	Not Stated	See DCC Comment above	CC-S6 - WASTE MANAGEMENT	The adopted Devon Waste Plan places no reliance on the provision of waste management capacity within the National Park. Therefore, the approach of policy CC-S6 to the sustainable management of waste arising within the National Park is supported.	

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0069	0069/09	Joe Keech Devon County Council	Not Stated	Not Stated	Not Stated	See DCC Comment above	4.26 (and section 20 of Duty to Cooperate Statement)	Reference to the Devon Landscape Policy Group could usefully be included here as referred to in the Devon Duty to Cooperate Protocol. The group seeks to ensure cross-boundary consistency in landscape and seascape character assessment evidence base wherever possible, and allows collaboration to ensure the setting of the National Park is taken into account in neighbouring landscape character assessment evidence base within Devon. For further information about the Group, including its Terms of Reference, see: <a href="http://www.devon.gov.uk/index/environmentplanning/natural_environment/landscape/landscapecharacter/landscapepolicygrp.htm">http://www.devon.gov.uk/index/environmentplanning/natural_environment/landscape/landscapecharacter/landscapepolicygrp.htm</a>	
0069	0069/10	Joe Keech Devon County Council	Not Stated	Not Stated	Not Stated	See DCC Comment above	CE-D1 - Protecting Exmoor's Landscapes and Seascapes	To ensure effects of proposed development on Exmoor National Park's landscape are robustly considered in line with current best practice, and to ensure consistency with the Devon Waste Plan and the Devon Minerals Plan, the phrase "professional landscape appraisal" could be amended to "Landscape and Visual Impact Assessment carried out by a suitably qualified landscape professional". This should follow latest best practice guidelines published by the Landscape Institute/IEEMA.	

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0069	0069/11	Joe Keech Devon County Council	Not Stated	Not Stated	Not Stated	See DCC Comment above	CE-D2 - Green Infrastructure Provision	To be consistent with the Devon-wide approach to Green Infrastructure, it is recommended that this policy reflects the Guiding Principles of the Devon GI Strategy, in particular Principle 1 (relating to the need to consider GI at the earliest stage, allowing existing/potential GI assets to inform new development). The GI Strategy is now published online: <a href="https://new.devon.gov.uk/greeninfrastructure/">https://new.devon.gov.uk/greeninfrastructure/</a>	
0069	0069/12	Joe Keech Devon County Council	Not Stated	Not Stated	Not Stated	See DCC Comment above	Whole Plan	It would be useful for there to be consistency when describing different types of access throughout the document. It is suggested that the terms 'walking, cycling, horse-riding' and 'public rights of way, permissive paths, trails and access land' are used as generic terms.	
0069	0069/13	Joe Keech Devon County Council	Not Stated	Not Stated	Not Stated	See DCC Comment above	8.95	This paragraph makes reference to the Devon Rights of Way Improvement Plan and footnote 403 makes reference to the Devon ROWIP 2005. However, this document was updated in 2012 and can be found online: <a href="http://www.devon.gov.uk/index/environmentplanning/public_rights_of_way/rowip.htm">http://www.devon.gov.uk/index/environmentplanning/public_rights_of_way/rowip.htm</a>	



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0069	0069/14	Joe Keech Devon County Council	Not Stated	Not Stated	Not Stated	See DCC Comment above	9.8	Any tourism signage applications within the National Park are authorised by Somerset County Council (SCC) or DCC as the local highway authorities. Any applications affecting the surrounding trunk road network are managed by Highways England (HE) but SCC and DCC are still the first point of contact for applications located within the park area before HE are consulted. DCC does consult with the National Park for brown signs in DCC local area.	
0069	0069/15	Joe Keech Devon County Council	Not Stated	Not Stated	Not Stated	See DCC Comment above	AC-S2 - TRANSPORT INFRASTRUCTURE	Although the aim of this policy is understood, retaining or replacing like for like street furniture may be challenging in the context of current/future highway maintenance policy and funding. As such, discussions between the Highway Authority and the LPA would be beneficial to ensure appropriate signage can be provided in a manner which reflects local character.	
0069	0069/16	Joe Keech Devon County Council	Not Stated	Not Stated	Not Stated	See DCC Comment above	9.9	AC-2 (i) may be an unnecessary statement to incorporate as DCC would not wish to upgrade roads solely for the reason of increasing speed. The wording in AC-S2 (j) has the potential to restrict improvements to the A39 where road schemes could potentially be considered to be justified and necessary.	

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0069	0069/17	Joe Keech Devon County Council	Not Stated	Not Stated	Not Stated	See DCC Comment above	AC-S2 - TRANSPORT INFRASTRUCTURE	AC-2 (i) may be an unnecessary statement to incorporate as DCC would not wish to upgrade roads solely for the reason of increasing speed. The wording in AC-S2 (j) has the potential to restrict improvements to the A39 where road schemes could potentially be considered to be justified and necessary.	

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0069	0069/18	Joe Keech Devon County Council	Not Stated	Not Stated	Not Stated	See DCC Comment above	9.20-9.22	<p>The DCC A and B highways within the network through the park are of equal status in terms of DCC maintenance categories. Characteristics of individual highways can affect their suitability for different types of traffic. For example, although an A class road, the A39 through Lynton/Lynmouth is not a county primary route for traffic and is not suitable for a few types of large vehicle.</p> <p>Local Freight Routes may not be considered suitable for restriction to 'local access only' as the A and B routes through the park are important for local freight movements. Instead of stating that the routes could be considered for restriction to local access only, it is suggested that this could be worded more helpfully to 'lower priority to through traffic and encouraged for local access only'. However, it is understood that the wording in this section has been included to mirror that of Somerset County Council's Freight Mapping and, as such, further discussion between DCC and Exmoor National Park may be required on this matter.</p>	
0069	0069/19	Joe Keech Devon County Council	Not Stated	Not Stated	Not Stated	See DCC Comment above	9.24	<p>It may be helpful if the principle of avoiding adverse impacts from parking on the highway set out in paragraph 9.24 were to be reflected in the main text of policy AC-S3.</p>	

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0069	0069/20	Joe Keech Devon County Council	Not Stated	Not Stated	Not Stated	See DCC Comment above	AC-S3 - TRAFFIC MANAGEMENT AND PARKING	It may be helpful if the principle of avoiding adverse impacts from parking on the highway set out in paragraph 9.24 were to be reflected in the main text of policy AC-S3.	
0070	0070/01	Mr Paul Williamson British Association for Shooting and Conservation	Not Stated	Not Stated	Not Stated		Whole Plan	BASC welcomes the close working relationship between Exmoor National Park Authority and the Greater Exmoor Shoots Association. This is evidenced in the draft local plan and BASC is pleased to see acknowledgement given to the valuable income shooting brings to the local economy and the support of tourism businesses outside of the main season.	
0070	0070/02	Mr Paul Williamson British Association for Shooting and Conservation	Not Stated	Not Stated	Not Stated		7.28	BASC fully supports the position of the Exmoor National Park with respect to game shooting as per paragraph 7.28 in the consultation document. In particular, it has long been recognised that game shooting is very much ancillary to the farming activity hence no requirement for Planning Permission.	
0070	0070/03	Mr Paul Williamson British Association for Shooting and Conservation	Not Stated	Not Stated	Not Stated		8.12	BASC is concerned about the assertion in paragraph 8.12 that clay-pigeon shooting grounds are considered to be inappropriate in the National Park. We have reviewed the references given and these do not support the assertion made. We would therefore ask that the reference to clay pigeon shooting be removed from this paragraph.	

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0070	0070/04	Mr Paul Williamson British Association for Shooting and Conservation	Not Stated	Not Stated	Not Stated		8.73	With reference to the Recreational Development section of the consultation and in particular paragraph 8.73 BASC understands that in certain circumstances the rearing of game requires Planning Permission. Importantly as previously stated the shooting of game does not require Planning Permission due to the activity being ancillary to the farming operations.	

0071	0071/01	Mr Roger Watts	Not Stated	Not Stated	Not Stated		Whole Plan	<p>2. I have long roots on Exmoor and have a deep loyalty to the area. Returning from London to live in Dulverton I find myself apprehensive about the threats posed to Exmoor by the pressures of population, of traffic and other impacts of the modern world. Exmoor has been fairly lucky so far but the pressures will grow. Can the timeless tranquillity still to be found on Exmoor survive the Modern Age? If so, how? Although easy to forget in the Summer months - and particularly surprising given the imprint of man's activities everywhere on Exmoor - one of Exmoor's fascinations is a sense of wildness .... one of its most precious attributes. Two vastly different ages now coexist in close proximity.</p> <p>3. Perhaps we should keep in mind that taking up residence in a National Park in the US is no longer allowed? I'd suggest our task should be to act as a custodian to withstand the pressures we are increasingly facing which threaten the very essence of Exmoor, its settlements, and the surrounding areas? What I see in this Local Plan is an attempt to channel development within the National Park from villages to "service centres" which is self defeating - and perhaps ultra vires.</p> <p>4. I am very surprised that the words "Exmoor Pony" feature not at all in the report? A central aim of the Plan ought to be to conserve the rare – and perhaps ancient – herds of wild living ponies on Exmoor.</p> <p>5. Finally it would appear unwise to attempt to draw up a Local Plan to guide development in the</p>	
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								use of land on Exmoor until 2031 without making provision for review? Between now and then there will profound changes including financial and housing boom and busts, significant transport innovations such as driverless vehicles, and social changes emerging from the digital revolution.	
0071	0071/02	Mr Roger Watts	Not Stated	Not Stated	No		1.4	<p>“Exmoor provides a sense of remoteness, wildness and tranquillity.”</p> <p>This seems to me preeminent amongst the Special Qualities of Exmoor. And by inserting it here in paragraph 1.4 it helps set the context for the subsequent ambition at para 2.2.....”to retain Exmoor's sense of remoteness, wildness and tranquillity.”</p> <p>It might also be again inserted in GP1?</p>	<p>Insert:</p> <p>“Exmoor provides a sense of remoteness, wildness and tranquillity.”</p>

0071	0071/03	Mr Roger Watts	No	Not Stated	No		3.38-3.38	<p>Not Legally Compliant?                  The Exmoor National Park Authority has been required under this Local Plan process - just as I understand it has under previous Local Plans - to produce a “settlement hierarchy” which effectively requires the Authority to identify at least one, and preferably more, settlements within the National Park considered the most appropriate locations for future development? What I see is an attempt to channel development within the National Park from villages to “service centres” which is self defeating - and perhaps ultra vires.</p> <p>This may well run counter to the intentions of Parliament in establishing the National Parks? In the case of Exmoor settlements such as Dulverton, Lynton &amp; Lynmouth and Porlock have been included within the National Park boundary . It seems to me that, in the case of the National Parks, Parliament would have anticipated that all development proposals within the boundaries of a National Park should be assessed equally on the basis of being compatible - or not - with the overriding objectives of the preservation and enhancement of the National Park?</p> <p>If I'm right the Courts could strike down the settlement hierarchy methodology as Government exceeding its powers?</p> <p>Not Sound or Effective?                  It might be argued that in effect under this Local Plan Dulverton Lynton &amp; Lynmouth and Porlock are being extracted, to some degree, from the Exmoor National Park for purposes of housing and other development? I'd argue that over the next</p>	<p>Delete references to Dulverton, Lynton &amp; Lynmouth and Porlock as “service centres” and describe them instead as “attractive, small historic towns”.</p> <p>Insert:                  “ Dulverton, Lynton &amp; Lynmouth and Porlock are the largest settlements within the Exmoor National Park. Each is an attractive and historic town - and an essential part of the National Park. The built environment, individual buildings, villages and settlements are as much a part of what makes Exmoor special as the natural beauty, wildlife and bustling communities. All development proposals in these settlements should be compatible with the overriding objective of the preservation and enhancement of the scenic beauty, natural systems and wildlife and cultural heritage of Exmoor. “</p> <p>Delete the sentence suggesting that Dulverton has been identified as “the most suitable location, in principle, for new development to consolidate employment and services to help address the needs of the</p>
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Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
								<p>couple of decades any such move would have significant disadvantageous consequences for (a) Dulverton, Lynton &amp; Lynmouth and Porlock and (b) for the Exmoor National Park more widely. I find myself apprehensive about the threats posed to Exmoor by the pressures of population, of traffic and other impacts of the modern world. Exmoor has been fairly lucky so far but the pressures will grow and represent a huge challenge to efforts to retain Exmoor's sense of remoteness, wildness and tranquillity</p>	<p>National Park as a whole, the surrounding area, and the local community".</p> <p>And substitute the assessment from the technical paper on a hierarchy of settlements that Dulverton is:                      " Considered to have limited capacity for development due to constraints of landscape (setting of Pixton and Hollam Park), wildlife designations, land liable to flooding, Important Open Space and physical constraints of steeply sloping landscape."</p>

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0071	0071/04	Mr Roger Watts	Not Stated	Not Stated	No		8.55	<p>Not Sound or Effective?</p> <p>The arguments against touring caravans in this paragraph are generally sound - but they apply just as much to existing caravan sites? The centre of the Barle Valley is covered at present in a great deal of concrete, cars and caravans. Why not consider setting up instead an open air folk museum along the lines of those at Singleton in Sussex or St Fagans near Cardiff or at Shannon in the west of Ireland which would be an alternative and better way to bring in tourism:</p> <p><a href="http://www.wealddown.co.uk/">http://www.wealddown.co.uk/</a>  <a href="http://www.museumwales.ac.uk/stfagans/">http://www.museumwales.ac.uk/stfagans/</a>  <a href="http://www.shannonheritage.com/DaytimeAttractions/">http://www.shannonheritage.com/DaytimeAttractions/</a></p>	delete the word "new"
0071	0071/05	Mr Roger Watts	Not Stated	Not Stated	No		Inset Map 7 Dulverton	<p>Perhaps I can add some personal comments on the way that the plan impinges on my premises at Berry House, Oldberry Lane, Dulverton, TA22 9HR?</p> <p>The back garden of my house is included as part of historic Dulverton - but not the side or front gardens?</p> <p>Curious that the Iron Age hill fort at the top of Oldberry Lane is not included as part of historic Dulverton? It has been in earlier Local Plans.</p>	

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0071	0071/06	Mr Roger Watts	Not Stated	Not Stated	No		Evidence	The following Exmoor Reviews published by the Exmoor Society contain articles relevant to Dulverton which ought to be included as evidence in the current discussions:	1973 - "Traffic and People" by Arthur Hull 1974 - "Dulverton: a Town under Pressure" by four Somerset architects 2010 - "Exmoor's Future - A Warning from the East" by Anthony Passmore. Mr Passmore warns that he has watched the degradation of the New Forest from a place with many of the qualities of Exmoor into a "a noisy and over-used suburban park" .... the result not of any evil intention but the cumulative effect of many minor "improvements".
0072	0072/01	Mrs Susan May Exmoor Trust	Not Stated	Not Stated	Not Stated		Whole Plan	Clarity is always good, and removal of unnecessary duplication and cross referencing is helpful for prospective applicants.	
0072	0072/02	Mrs Susan May Exmoor Trust	Not Stated	Not Stated	Not Stated		CE-D1 - Protecting Exmoor's Landscapes and Seascapes	New policies to protect land and seascapes so that they remain important aspects of why folk visit the area have to be good.	

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0072	0072/03	Mrs Susan May Exmoor Trust	Not Stated	Not Stated	Not Stated		CE-S3 - BIODIVERSITY AND GREEN INFRASTRUCTURE	Biodiversity and green infrastructure policies need careful looking at on an individual basis. Protection of rare species and Exmoor's flora and fauna is of paramount importance.	
0072	0072/04	Mrs SusanMay Exmoor Trust	Not Stated	Not Stated	Not Stated		CE-S5 - PRINCIPLES FOR THE CONVERSION OR STRUCTURAL ALTERATION OF EXISTING BUILDINGS	Conversion of traditional and non-traditional farm buildings would be helpful to increase the number of available homes, without new-builds interfering with the landscape views and the dark starry skies designation.	
0072	0072/05	Mrs Susan May Exmoor Trust	Not Stated	Not Stated	Not Stated		CC-S3 - PORLOCK WEIR COASTAL CHANGE MANAGEMENT AREA	We are not in a position to make comments about policy concerning coastal change, but a policy which takes account of these changes should be in place.	
0072	0072/06	Mrs SusanMay Exmoor Trust	Not Stated	Not Stated	Not Stated		HC-S1 - HOUSING	We are in full agreement that new builds should have a principle residence tie. We also agree that a supply of houses which address the needs of individual local people is what should be built. Garages, dog kennels, log houses, workshops, a porch, a stable and an out house are some of the buildings which country people need - plus space for a garden.	
0072	0072/07	Mrs Susan May Exmoor Trust	Not Stated	Not Stated	Not Stated		RT-D3 - Safeguarding Serviced Accommodation	Allowing guesthouses and hotels to become housing is good. Changing hotels, guest houses and B and B accommodation to housing and back again if required will be helpful in many cases. Also holiday occupancy.	

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0072	0072/08	Mrs Susan May Exmoor Trust	Not Stated	Not Stated	Not Stated		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	Differing comments regarding the Lynton and Barnstaple railway and how it will affect those closest to it.	
0072	0072/09	Mrs Susan May Exmoor Trust	Not Stated	Not Stated	Not Stated		AC-D3 - Parking Provision and Standards	Parking costs need to encourage visitors to park all day and therefore contribute to the local economy by being able to stay longer.	
0072	0072/10	Mrs Susan May Exmoor Trust	Not Stated	Not Stated	Not Stated		11 Monitoring and Implementation Framework	Monitoring how the new plan is working will allow alterations to be made - as and when seen to be necessary.	
0072	0072/11	Mrs Susan May Exmoor Trust	Not Stated	Not Stated	Not Stated		HC-D3 - Specialist Housing for Exmoor's Communities	Specialist housing is a need which is going to increase significantly in the coming years and should be in consideration now.	
0072	0072/12	Mrs Susan May Exmoor Trust	Not Stated	Not Stated	Not Stated		HC-D4 - Extended Family Dwellings Criteria	Extended family dwellings - this will give the older members of the family a chance to stay near their family which has to be beneficial on many counts.	
0072	0072/13	Mrs Susan May Exmoor Trust	Not Stated	Not Stated	Not Stated		HC-D19 - Safeguarding Local Services and Community Facilities	Safeguarding local services and community facilities is extremely important to the future of a sustainable Exmoor.	

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0072	0072/14	Mrs Susan May Exmoor Trust	Not Stated	Not Stated	Not Stated		SE-S1 - A SUSTAINABLE EXMOOR ECONOMY	Policies which assist business development on Exmoor are vital, as is the provision of mobile services and broadband availability.	
0072	0072/15	Mrs Susan May Exmoor Trust	Not Stated	Not Stated	Not Stated		AC-S4 - ELECTRICITY AND COMMUNICATIONS NETWORKS	Policies which assist business development on Exmoor are vital, as is the provision of mobile services and broadband availability.	

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0073	0073/01	Judy Williams	Not Stated	Not Stated	Not Stated		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	<p>I have been the catering manager at Woody Bay Station for five years and have seen the increase in visitors and activity that this Railway has achieved. Their plans to reinstate the whole track eventually can only be a fantastic thing for the area, which relies on tourism and visitors for incomes and jobs in this area.</p> <p>Their attention to detail, dedication to replacing the Railway in a sympathetic way, having spent a lot of time and money on surveys and planning can only prove their dedication to achieving this end. It is a beautiful site and can only enhance the attraction of people to the area. This has been proved by the increase in visitor numbers and enthusiasm of the many volunteers who work there.</p> <p>I hope this email will suffice as an enthusiastic response in favour of allowing the Lynton and Barnstaple to move forward with their plans, so we can all look forward to seeing a steam train making its way from Wistlandpound to Lynton in the very near future.</p>	

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0074	0074/01	Mr Peter Miles Lynton & Barnstaple Railway Trust	Yes	Yes	Yes		RT-D13 - Safeguarding Land Along Former Railways	<p>The reinstatement of the Lynton &amp; Barnstaple Railway has substantial benefits for Exmoor and North Devon. The benefits include employment both direct and indirect, encouragement of tourism on a world-wide basis and economic benefits to the local economy running into £ millions annually.</p> <p>The railway will also form useful links between various rights of way along the route encouraging walking, cycling and enjoyment of the Park on a wide basis.</p> <p>The reinstatement will also enable the restoration of important historic and cultural assets within Exmoor.</p>	
0074	0074/02	Mr Peter Miles Lynton & Barnstaple Railway Trust	Yes	Yes	Yes		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	<p>The reinstatement of the Lynton &amp; Barnstaple Railway has substantial benefits for Exmoor and North Devon. The benefits include employment both direct and indirect, encouragement of tourism on a world-wide basis and economic benefits to the local economy running into £ millions annually.</p> <p>The railway will also form useful links between various rights of way along the route encouraging walking, cycling and enjoyment of the Park on a wide basis.</p> <p>The reinstatement will also enable the restoration of important historic and cultural assets within Exmoor.</p>	



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0075	0075/01	Mr Keith Vingoe	Yes	Yes	Yes		8.98	<p>I am certain the intention to restore the Lynton &amp; Barnstaple Railway will not only be an excellent addition to the area's leisure amenities, but will also play an enormous role in the future economic wellbeing of Exmoor National Park. Being a recognised part of the lost heritage of Exmoor, its reinstatement is long overdue</p> <p>As a frequent visitor to Exmoor who as a member of Exmoor Tourism is actively involved in the support of rural tourism, I have seen this railway evolve into one if the "must see" family attractions in the area. Interestingly, when MS Prinsendam recently docked at Ilfracombe, its passengers - mainly retired Americans - took a trip to Woody Bay to ride the steam train, as there are few other suitable attractions for them to visit.</p> <p>I would hope that the National Park will continue to support the principle of a working narrow-gauge steam railway from Lynton to Wistlandpound and beyond, as to do so will result in an attraction and a benefit of international reputation and contribute greatly to the wellbeing of Exmoor.</p>	
0076	0076/01	Mr Charles Maycock	Yes	Yes	Yes		8.98-8.111		

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0077	0077/01	Mr David Edwards	Not Stated	Not Stated	Yes		RT-D13 - Safeguarding Land Along Former Railways		
0077	0077/02	Mr David Edwards	Not Stated	Not Stated	Yes		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY		
0078	0078/01	Mr Leslie Riches	Not Stated	Not Stated	Yes		8.98-8.99, 8.102-108 RT-D13 - Safeguarding Land Along Former Railways	As a Member of the Lynton and Barnstaple Railway's Trust and Community Interest Company, I fully support the Authority's Plan to incorporate this Heritage Railway's interests in completing the reinstatement of the original Railway as far as possible. The ultimate achievement of this must inevitably lead to the economic growth and well being of the Area and provide jobs for the people of North Devon.	
0078	0078/02	Mr Leslie Riches	Not Stated	Not Stated	Yes		8.105-108	As a Member of the Lynton and Barnstaple Railway's Trust and Community Interest Company, I fully support the Authority's Plan to incorporate this Heritage Railway's interests in completing the reinstatement of the original Railway as far as possible. The ultimate achievement of this must inevitably lead to the economic growth and well being of the Area and provide jobs for the people of North Devon.	

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0079	0079/01	Mr Robert Crouden	Not Stated	Not Stated	Not Stated		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	<p>We the persons signed below, being Members of the Lynton and Barnstaple Railway, fully support the actions of the Lynton &amp; Barnstaple Railway in wishing to reinstate the Railway along its former route in accordance with what is required in this Application.</p> <p>We further support the actions of the ENPA in presenting the ENPA Local Plan in relation to the work of the Lynton &amp; Barnstaple Railway.</p> <p>We support other Heritage and Preservation Societies with their Local Authority in ensuring "best practise and good value" to all involved in these enterprises.</p>	

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0080	0080/01	Mr Martin Steel	Not Stated	Not Stated	Not Stated		8.98-8.111	<p>I am writing in order to support your plan in general as sound, and to support, in particular, the strategy and policy that relates to the re-instatement of the L&amp;B Railway. I refer to section 8.98 onwards.</p> <p>In my view you have got the thinking absolutely correct by ensuring that the railway becomes again a “part of the green infrastructure network” and that “sustainable construction methods are used”. These ideas fit nicely with what the railway themselves intend; I know they are always talking about the heritage aspects of their work and that they are showing the attributes of a very professional and high-integrity operation thus far. They know that the juxtaposition of the countryside with engineering and transport is a compelling thing to the public and that these things can all live together synergistically.</p> <p>The reopening of longer stretches of the railway is key to the development of enjoyment of people coming to the area and to the local economy, with jobs and service work being created.</p> <p>I support this draft plan</p>	

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0081	0081/01	Mr Richard Pocock	Not Stated	Not Stated	Not Stated		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	I am pleased to see you support the principle of the reinstatement of the railway. This will provide valuable tourism which will enhance the economy of the region (impact of the Welsh Highland Railway on the economy of Snowdonia), allow access to the park avoiding congestion of increased cars and the presence of the railway will enhance the landscape. The Lynton and Barnstaple Trust must be supported and encouraged to fulfil their aims, initially to reinstate the line to Blackmore Gate which will make the railway more attractive to tourists and this will allow the finances to extend to Lynton which will have a major boost to the town's finances and allow a park and ride. The extension to Barnstaple should be much easier once the initial phases are completed and this will have an even bigger impact on the areas tourism and economy.	

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0082	0082/01	Mrs Heather Cross	Yes	Yes	Yes		8.98	I fully support the reinstatement of the Lynton and Barnstaple Railway as I feel it will attract more visitors to the area building on the economic prospects of the area, creating more jobs both relating directly from the railway and also in the hospitality business- We visit at least 3 times a year staying in Lynton and have done so now for at least 14 years all as a result of the railway – we have also introduced our friends to the railway who have now been visiting with us for at least 12 years. Whist staying in Lynton we also visit other local attractions and eat in local pubs/restaurants. I also think the extension to the reservoir will be a great attraction bringing it to the attention of many more visitors but keeping cars off the roads in the immediate vicinity.	

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0083	0083/01	Mr Richard Greenwell	Not Stated	Not Stated	Not Stated		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	<p>I write further to my earlier comments regarding the reinstatement of the Lynton &amp; Barnstaple Railway. Reading the objectives contained in your Draft Exmoor Report, the aims of the L &amp; B Railway Trust would certainly seem to be in line with the Plan's objectives.</p> <p>The reinstatement of the Railway is intended to create a historically accurate railway that will be beneficial to the understanding of the past development of Exmoor, thereby providing a valuable educational resource. In addition it will act as a stimulus to the growth of tourism and will provide a boost to pre-existing local businesses. The Railway is intended to be constructed in a way which is sympathetic to the natural environment and to the wildlife of Exmoor. At the same time, if the Park and Ride Scheme is carefully implemented, then it should provide a means of the public viewing Exmoor without the need for additional cars on the roads. In the future, the Railway may even relieve some of the existing traffic on Exmoor's roads. The success of the Welsh Highland Railway, in Snowdonia, should serve as an example of the positive outcome of such a scheme.</p> <p>I wholeheartedly support the plans to reinstate the Lynton &amp; Barnstaple Railway and urge the Exmoor National Park, along with the relevant Local Authorities, to do likewise.</p>	

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0084	0084/01	Mr Robert Cross	Yes	Yes	Yes		8.98	<p>I wish to give my support to the reinstatement of the Lynton &amp; Barnstaple Railway. The railway already is a major attraction in north Devon, bringing in people to the area . As the railway extends this can only improve with the railway taking cars off the road carrying more people into Exmoor.</p> <p>I support the Railway reinstatement in the style of the original railway as this will not detract or spoil the countryside but rather add to it, just look at Woody Bay station, delightful.</p> <p>My wife and myself will spend 11 nights B&amp;B in Lynton, and 7 nights in a rented house this year, and have visited 3 - 4 times a year since 2002, and with friends since 2004. We eat at local pubs and restaurants, as well as visiting other local attractions.</p>	



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0085	0085/02	Mr Jeremy Payne Parsonage Farm	Not Stated	Not Stated	Not Stated		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	I wish to register that I believe the L&B plan to be an excellent addition to the area's leisure amenities, transport infrastructure and heritage. As a holiday let manager, I frequently send our holiday guests to the L&B, and they invariably love it – aided by a generous voucher which is sent to me by the L&B. There is no question that this would be a key addition to area's attractions, it would enhance the experience in so many ways. There is no question as to whether the renovated track and amenities would be appropriate, I know the L&B team to be obsessive in their pursuit of original features, often sourced from around the country and even abroad. I cannot recommend this scheme highly enough, and urge the National Park to continue with support and funding to bring the conclusion of the project – a working track from Lynton to Barnstaple – forward as soon as possible.	No modifications are required. The plan has been totally thought through and, to my knowledge, has the overwhelming support of the local community – especially those concerned with tourism, such as myself. I urge the National Park to expedite its approval and provide as much funding as required to bring the project to fruition.
0086	0086/01	Mr James Evans	Yes	Yes	Yes		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	This policy is sound, and as shown by the similar reinstatement of the Welsh Highland Railway in the Snowdonia National Park, has the potential to provide car-free access to parts of Exmoor and Lynton/Lynmouth, as well as increasing local employment and financial benefits from tourism.	

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0087	0087/01	Mr Nigel Carter	Yes	Yes	Yes		8.102-8.111 RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	I give my unqualified support to this proposed policy encouraging the reinstatement of the Lynton & Barnstaple Railway.	
0088	0088/01	Canon Herbert Davis	Yes	Yes	Yes		8.98		
0089	0089/01	Mrs Sara Davis	Yes	Yes	Yes		8.98		
0090	0090/01	Mr John Brunt	Yes	Yes	Yes		8.98-8.111	The Lynton & Barnstaple railway is a national asset of extreme value to our rail heritage. Its originality and restoration is a matter of great importance.	
0091	0091/01	Mr David Tooke	Yes	Yes	Yes		RT-D13 - Safeguarding Land Along Former Railways	The route of the former Lynton & Lynmouth Railway needs to be safeguarded in order to permit the railway to be reinstated in due course.	
0091	0091/02	Mr David Tooke	Yes	Yes	Yes		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	Reinstatement of this former railway will provide 'green' public transport, and will also encourage extra visitors to this area, to the benefit of all local businesses.	

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0092	0092/01	Ms Anne Belsey	Yes	Yes	Yes		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	<p>I support the re-instatement of the Lynton &amp; Barnstaple Railway from Blackmoor Gate to a new station in Lynton close to the town centre.</p> <p>National Parks need to attract visitors in order to support local economies that have few inward income-generating businesses other than tourism.</p> <p>However, excessive visitor numbers can detract from the attractiveness of an area, especially when such visitors are reliant on private, low-occupancy motor vehicles. These detractions include congestion, noise and pollution.</p> <p>A re-instated Lynton &amp; Barnstaple Railway running from North Devon's major road junction at Blackmoor Gate to Lynton and Lynmouth would mitigate the negative impact of increased visitor numbers to the area.</p> <p>Furthermore, a steam narrow-gauge railway, complete with rebuilt or replica Victorian-era rolling stock and structures would both enhance the attractiveness of the Lynton area and promote awareness of the particular geographical challenges with which this corner of England has historically had to cope.</p>	

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0093	0093/01	Mr Godfrey Slatter Lynton & Barnstaple Trust	Yes	Yes	Yes		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY		
0093	0093/02	Mr Godfrey Slatter Lynton & Barnstaple Trust	Yes	Yes	Yes		RT-D13 - Safeguarding Land Along Former Railways		
0094	0094/01	Mr Michael Denny	Yes	Yes	Yes		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	I am a retired graphic designer and company director living in Surrey and have visited Exmoor frequently over the past fifteen years. The reason I have been a regular visitor is principally the Lynton and Barnstaple Railway. Through these visits I began to explore Exmoor and have come to love its magnificent and varied scenery as well, of course, as spending money in various pubs, tearooms, shops and other tourist attractions. To have a feature such as the Railway that I believe enhances that scenery and supports the preservation of our industrial heritage is an opportunity not to be missed. I wholeheartedly support Policy RT-S2 which I believe will safeguard the route of the Railway and allow its future development.	

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0095	0095/01	Mr Andrew Jones	Yes	Yes	Yes		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	I wholeheartedly support the policies aimed at supporting the re-instatement of the Lynton and Barnstaple railway – I believe it to be commendable way of supporting the local economy via tourism without despoiling the national park with further development of the road infrastructure.	
0096	0096/01	Mr Edward Lawrence	Yes	Yes	Yes		8.102-8.111	I believe the reinstatement of the Lynton & Barnstaple Railway will be highly beneficial to the community and future prosperity of North Devon. It will become a major tourist attraction for the area and the peripheral affect of this will be considerable, to both those directly or indirectly involved in the tourist industry. One has only to see the affect on the local economy of the resurrected narrow gauge railways in North Wales, to realise the profound affect of extending and further sections of the Lynton & Barnstaple will have on North Devon.	
0097	0097/01	Mr Alan Golden Lynton & Barnstaple Railway Association (member)	Yes	Yes	Yes		8.98	I have long been a (non-active) member of the Lynton & Barnstaple Railway Association, supporting its aims to reinstate the line as far as is possible and as such I fully support the proposed policy set out in the Draft Local Plan. I believe reinstatement of the railway can only be of benefit to the national park.	

0098	0098/01	Mr Michael Clarke	Not Stated	Not Stated	Not Stated		<p>RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY</p>	<p>I am a retired Civil Engineer in my 80's, who first fell in love with this area and this charming railway in the early 1960's. This was the result of reading the publication by the Oakwood Press of the history of the line. As a result we visited the area to see how much of the line was still visible, along with the Chelfham viaduct and former delightful station building and the little bridge at Bratton Fleming. Subsequently we have returned to enjoy Woody Bay Station, the Exmoor scenery and the continuing reinstatement of the narrow gauge line.</p> <p>I have to admit to being a steam railway enthusiast / steam railway supporter, probably originating from pre-war childhood seaside holidays by train. I am a shareholder of the Severn Valley Railway/ a Life Member of the Mid Hants Railway / a member the Forest of Dean Railway and member of the Lynton &amp; Barnstaple Railway. I am sure that you will be aware of the Welsh Highland Railway and the long struggle with the Snowdonia National Park in finally getting approval to reinstate the railway line from Porthmadog to Caernarfon.</p> <p>I trust that the true benefits to this area have now been fully appreciated by all. This also applies over a much longer period of time, to all the other preserved railways to which I subscribe and enjoy membership. The prosperity that these railways bring to their respective locations is very considerable and should not be under-estimated. In addition, at least two of these railways have now been able to provide apprenticeships in engineering for the on-going maintenance of the railways. This again is a very worthwhile opportunity which will hopefully be allowed to materialise. Similar apprenticeship opportunities</p>	
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								<p>in engineering today are hard to find and this element of the railway extension is really worthy of consideration, if the railway is allowed to be extended to viable working length.</p> <p>I sincerely hope that after carefully examining and considering all the relevant criteria, you will be minded to find in favour of allowing this narrow gauge railway to continue to extend. This will bring much happiness to many tourists who will want to come and enjoy the Exmoor scenery, with the views from the train. It will also provide much needed future prosperity to the area and increased trade to the adjoining towns.</p>	
0099	0099/01	Mr Hugh Pead	Yes	Yes	Yes		8.98	<p>The railway will in the future provide a tourist attraction to the area like the Welsh Highland Railway has to Wales, this will bring much needed jobs and income to local people and business in the area.</p>	

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0100	0100/01	Mr Philip Groves	Yes	Yes	Yes		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	I wish to register my full support for the scheme to rebuild the former Lynton & Barnstaple Railway. Although not resident in the UK I know Devon and the Exmoor region well. I am confident the reconstruction of the railway will bring many benefits to the region, especially tourism and, we can hope, a reduction in private transport. It will also give a boost to businesses, retail, catering, hotels etc. As an active member of Smalsparet in Sweden (see <a href="http://www.smalsparet.se">www.smalsparet.se</a> ) I have seen how support over the years, from both the local and regional councils, as well as National Heritage, have helped the railway to develop into one of Sweden's 'top-10' industrial and heritage sites, and the benefits it has brought to the community generally. It is the first 'listed' railway in Sweden. In passing, one only needs to look at the reconstruction of the Welsh Highland Railway to appreciate what can be achieved and, similarly, the benefits to businesses and tourism throughout the north Wales region. It can happen in Exmoor too.	



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0101	0101/01	Mr Michael Pearce	Not Stated	Not Stated	Not Stated		RT-D13 - Safeguarding Land Along Former Railways	I wish to express my support for the paragraphs which will enable the re-instatement of the Lynton & Barnstaple Railway. The section which has been opened has already had a positive impact on the local economy. I am just one of the many supporters who travels from afar to stay in a B&B in Lynton several times a year, just because the railway is open. The proprietors of that B&B have told me many times how their business has benefitted from the railway - they look forward to even more trade as the railway evolves. The same is true for restaurants and other businesses in the area. All this helps to give employment to future generations.	
0102	0102/01	Mr John Bennett	Yes	Yes	Yes		RT-D13 - Safeguarding Land Along Former Railways	I support this policy. It is vital that development that would frustrate the reinstatement of the L&B railway is prevented.	
0102	0102/02	Mr John Bennett	Yes	Yes	Yes		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	I support this policy and the criteria listed within it. The L&B Railway forms an important part of Exmoor's cultural heritage. Reinstatement of the railway would benefit tourism and enhance opportunities to enjoy the scenery.	

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0103	0103/01	Mr Andrew Giess	Yes	Yes	Yes		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	This is a terrific development [Lynton & Barnstaple Railway]. It will enhance North Devon, especially the tourist industry. It will increase local businesses both at Barnstaple and Lynton and the surrounding area by attracting visitors and also by local people access to some paid work and full time volunteering in the county.	
0104	0104/01	Mr David Simpson	Yes	Yes	Yes		8 Achieving Enjoyment for All	I wish to support wholeheartedly the reinstatement of the railway. It will be a major tourist attraction, providing great benefit for the local economy and enjoyment for visitors to the National Park.	
0105	0105/01	Mrs Frances Wise Lynton & Barnstaple Railway member	Yes	Yes	Yes		RT-D13 - Safeguarding Land Along Former Railways		
0105	0105/02	Mrs Frances Wise Lynton & Barnstaple Railway member	Yes	Yes	Yes		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY		
0106	0106/01	Mr Stuart Wise Lynton & Barnstaple Railway Member	Yes	Yes	Yes		RT-D13 - Safeguarding Land Along Former Railways		

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0106	0106/02	Mr Stuart Wise Lynton & Barnstaple Railway Member	Yes	Yes	Yes		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY		
0107	0107/01	Mr Albert Chandler Lynton & Barnstaple Railway member	Yes	Yes	Yes		8.98-8.111	All OK	
0108	0108/01	Mr Gary Poole	Yes	Yes	Yes		RT-D12 - Access Land and Rights of Way		
0108	0108/02	Mr Gary Poole	Yes	Yes	Yes		RT-D13 - Safeguarding Land Along Former Railways		
0108	0108/03	Mr Gary Poole	Yes	Yes	Yes		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY		

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0109	0109/01	Mr Richard Linguard	Yes	Yes	Yes		RT-D13 - Safeguarding Land Along Former Railways	I heartily support this policy. The example of the Welsh Highland Railway shows what benefits can accrue from the restoration of such a historic transport link - not just for the gratification of railway enthusiasts (who are known to contribute to the local economy) but also to the benefit of tourism and local businesses. Carried out sensitively, such a restoration can be a welcome addition to the area as well as providing a genuinely usable transport link. The fact that so much of the original structure are still extant means that the impact will be minimal.	
0109	0109/02	Mr Richard Linguard	Yes	Yes	Yes		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	I heartily support this policy. It is not just railway enthusiasts who will gain (although they bring business to the area) but the reinstated line would be a genuinely usable transport link. Most of the buildings (and Chelfam Viaduct) are still extant and the impact of the proposed new HQ at Blackmoor [Gate] would be minimal. The example of the Welsh Highland Railway demonstrates the huge benefits that this sort of scheme can bring. There is also an ideal route for the terminus - Barnstaple at Pilton Yard.	

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0110	0110/01	Mr Alex Thayre	Yes	Yes	Yes		8.98/8.102-8.111 RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	The reinstatement of the Lynton & Barnstaple Railway. I agree with the draft of the Local Plan with regards to the above. My view is that reinstatement of this railway could not only benefit Exmoor National Park area, and the people and businesses within. It is an important piece of our heritage which we should put back and not lose. In addition it would help with parking and lower the number of cars and coaches on the local roads, and also create a better transport link between locations, and open up areas that are sometimes by-passed which can only stimulate the local economy. As the railway grows in length, it will only draw more people to the area and let them experience more of the area than they may have seen by their own transport.	
0111	0111/01	Mr Allan Lewington	Not Stated	Not Stated	Yes		RT-D13 - Safeguarding Land Along Former Railways	I strongly support this policy, as I am in support of the reinstatement of the Lynton & Barnstaple Railway as an important part of Exmoor's heritage and any planning application that would act against safeguarding this land would jeopardize the project.	

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0111	0111/02	Mr Allan Lewington	Not Stated	Not Stated	Yes		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	<p>Ever since I first visited the Exmoor area over 40 years ago, with my wife's family connections to Parracombe, I have ben fascinated by the history and geography of the Lynton &amp; Barnstaple Railway. I have revisited the area several times and followed the progress of the Lynton &amp; Barnstaple Trust with enthusiasm.</p> <p>I live nearer the Ffestiniog and Welsh Highland Railways, and have seen the major boost that those heritage railways give to the local economy.</p> <p>I am sure that a restored Lynton &amp; Barnstaple Railway would bring an influx of visitors to Exmoor, who would then come to love the area, and wish to return frequently.</p> <p>So I support the reinstatement of the Lynton &amp; Barnstaple Railway.</p>	
0112	0112/01	Mr David Martin	Yes	Yes	Yes		8.105-8.111	I fully support the plan to reinstate the Lynton & Barnstaple Railway.	
0113	0113/01	Mr Donald Tyrer	Yes	Yes	Yes		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	I consider the reintroduction of as much as is possible of this 9ft gauge railway, will be of great benefit to the community of North Devon - for work, tourism and cash!	

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0114	0114/01	Mr Charles Routh Natural England	Not Stated	Not Stated	Not Stated		Habitats Regulations Assessment	Habitats Regulation Assessment (May 2015) for Exmoor National Park pre-publication Local Plan: Many thanks for the above consultation. Based on the policy extracts of the draft Local Plan provided within the Habitats Regulation Assessment May 2015, we are satisfied that the conclusion of the HRA (paras 104 - 105) that implementation of the draft Plan, subject to the modifications proposed, is not likely to result in significant effect on European protected sites, appears reasonable.	
0115	0115/01	Mr Tony Carnell	Yes	Yes	Yes		8.98-8.111	I fully support the aim of reinstating the Lynton & Barnstaple railway, as both a major tourist attraction and to provide a valuable alternative to using a car when visiting the area (particularly Lynton/Lynmouth which get very busy and congested during peak tourist season). It will also be a useful employer in an area where non-seasonal employment opportunities can be hard to come by.	

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0116	0116/01	Mr Richard Rider	Not Stated	Not Stated	Yes		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	<p>The policy appears to fit with the desire to retain the original use of buildings, as para 4.118, as well as encompass the possible adaptation of current buildings to best support 'current-day' use, as para. 4.119-123.</p> <p>Indeed, I have observed that the Railway Trust's proposals to date respect this policy, as well as other aspirations within the plan (please refer to section 8) e.g. promoting sympathetic leisure activities.</p> <p>Currently, the Railway Trust organises volunteer group walks all year round, and attracts volunteers to the area off season, who invariably stay and eat locally. These activities are occupational varying from catering to mechanical and civil engineering. This provides an opportunity for local people wanting to gain skills. These activities help sustain a thriving community in the heart of the moor.</p>	
0117	0117/01	Ms Emma Keir Lynton & Barnstaple Railway Member	Not Stated	Not Stated	Not Stated		8.98-8.111	<p>I wish it to be noted that I completely support all sections of the Publication Draft Local Plan 2011 - 2031 relating to past, current and future railway developments.</p>	



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0118	0118/01	Mr Mark Harding	Not Stated	Not Stated	Not Stated		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	I understand that the Lynton and Barnstaple railway is hoping to extend beyond its present route from Woody Bay to Killington Lane and that you are currently in the process of reviewing its plans. This is just a quick email to voice my support for this extension and to express my hope that you will grant the approvals they need to proceed. I look forward to visiting Exmoor again in due course to see the extension in place.	

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0119	0119/01	Eleanor Higginson Somerset Wildlife Trust	Not Stated	Not Stated	Not Stated		4.65-4.70 CE-S3 - BIODIVERSITY AND GREEN INFRASTRUCTURE	<p>We would like to offer our support for the commitment shown by the Exmoor National Park Authority throughout the Exmoor National Park 2011 – 2031 Local Plan, to maintain coherent, resilient ecological networks. We welcome the Local Plan as a clear statement that a landscape scale approach to linking up the habitats which Exmoor National Park is best known for is crucial to “Keeping Exmoor special” and will bring multiple benefits.</p> <p>We are pleased to see the commitment to habitat connectivity demonstrated in strategic policy CE-S3 Biodiversity and Green Infrastructure and also through development management policy CE-D2 Green Infrastructure Provision.</p> <p>The comprehensive explanation of ecological networks and how they will be used, included in paragraphs 4.65 to 4.70, is an essential reference for those referring to the Local Plan. However, areas of the network formally known as “the matrix” are now referred to as “dispersal areas” as it was felt that this described these parts of the ecological network better.</p>	<p>We would recommend that the Local Plan is updated to reflect this. Paragraphs containing reference to “the matrix” should be corrected as follows:</p> <p>4.68 The ecological network comprises core areas, stepping stones, "dispersal areas" and sustainable use areas.</p> <p>c) The "dispersal area" is a flexible buffer...</p> <p>4.70 ...and will generate net gain for biodiversity by enhancing restoration areas and "dispersal areas".</p> <p>CE-S3 Biodiversity and Green Infrastructure</p> <p>8. Green Infrastructure that incorporates measures to enhance biodiversity, including "dispersal areas" identified within the ecological network...</p>

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0119	0119/02	Eleanor Higginson Somerset Wildlife Trust	Not Stated	Not Stated	Not Stated		CE-D2 - Green Infrastructure Provision	<p>We would like to offer our support for the commitment shown by the Exmoor National Park Authority throughout the Exmoor National Park 2011 – 2031 Local Plan, to maintain coherent, resilient ecological networks. We welcome the Local Plan as a clear statement that a landscape scale approach to linking up the habitats which Exmoor National Park is best known for is crucial to “Keeping Exmoor special” and will bring multiple benefits.</p> <p>We are pleased to see the commitment to habitat connectivity demonstrated in strategic policy CE-S3 Biodiversity and Green Infrastructure and also through development management policy CE-D2 Green Infrastructure Provision.</p>	

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0120	0120/01	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated		Whole Plan	<p>The historic environment makes a vital contribution to the special qualities of the National Park and underpins the character and distinctiveness of the area’s landscapes and settlements. It also supports the benefits provided by the National Park for society, as for example in relation to tourism, recreation and amenity as well as wider the wider cultural aspects of sense of place, history, local character and distinctiveness. Moreover, the protection and enhancement of the historic environment is a fundamental dimension of sustainable development and pursuing it involves delivering positive improvements in the quality of the historic, natural and built environment. For the most part this is borne out in the Publication draft. A positive commitment to the conservation and enhancement of the National Parks heritage is apparent throughout the draft Plan, particularly so the Vision, Objectives and the Strategic Priorities. This usefully sets the tone and direction of the Plan and we welcome it.</p> <p>There are a few concerns that remain. Suggested changes are recommended to help you to demonstrate the Plan’s soundness in so far as the proposals and policies accord with the provisions of national planning policy; and are justified and effective in delivering sustainable development.</p>	

0120	0210/02	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated	Suggested changes are recommended to help you to demonstrate the Plan's soundness in so far as the proposals and policies accord with the provisions of national planning policy; and are justified and effective in delivering sustainable development.	3 General Policies	<p>While we are broadly supportive of the five general policies, the document frequently refers to the term cultural heritage. It reiterates this point in the Cultural Heritage and Historic Environment section. While I appreciate the document then defines this to include the historic environment (para. 3.4), it is nonetheless a very broad term and not entirely helpful in terms of development plans. If setting out a plan in accordance with the National Planning Policy Framework, it would be best to use those terms identified in national policy. The term "historic environment" is used in the NPPF to define its role as a core planning principle, its role in sustainable development, and again throughout section 12. It includes all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, including landscaped, planted or managed flora.</p> <p>It is also vital to include the term strategic policies for the historic environment in the local plan as the plan will be the starting point for decisions on planning applications and Neighbourhood Plans are only required to be in general conformity with the strategic policies of the Local Plan . The Local Plan should identify which policies it considers are strategic in order to assist those preparing Neighbourhood Plans.</p>	<p>If setting out a plan in accordance with the National Planning Policy Framework, it would be best to use those terms identified in national policy. The term "historic environment" is used in the NPPF to define its role as a core planning principle, its role in sustainable development, and again throughout section 12.</p> <p>The Local Plan should identify which policies it considers are strategic in order to assist those preparing Neighbourhood Plans.</p>
0120	0120/03	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated		CE-S3 - BIODIVERSITY AND GREEN INFRASTRUCTURE	<p>CE-S3 BIODIVERSITY AND GREEN INFRASTRUCTURE</p> <p>The role of the historic environment and the interrelationship with Green infrastructure and the opportunities it offers in mitigating harm to</p>	<p>The opportunities it [green infrastructure] offers in mitigating harm to the historic environment is under</p>

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								the historic environment is under recognised and should be enhanced.	recognised and should be enhanced.
0120	0120/04	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated		4 Conserving and Enhancing Exmoor	Cultural Heritage and Historic Environment We welcome the recognition of the historic environment in the draft publication and the thoroughness of the issues covered.	
0120	0120/05	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated		4.94	Paragraph 4.94 refers to adverse impacts while the term harm is more appropriate in order to achieve better compliance with the NPPF. There are a number of other examples of this throughout the document.	Paragraph 4.94 refers to adverse impacts while the term harm is more appropriate in order to achieve better compliance with the NPPF.
0120	0120/06	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated		CE-S4 - CULTURAL HERITAGE AND HISTORIC ENVIRONMENT	Policy CE-S4 and CE – D3 We welcome these policies and text. You are obviously aware of the Good Practice Advice (GPA) notes which provides supporting information on good practice, particularly looking at the principles of how national policy and guidance can be put into practice. You may wish to update your references as three have now been published with a fourth on the way. <ul style="list-style-type: none"> <li>• GPA1 - Local Plan Making</li> <li>• GPA2 - Managing Significance in Decision-Taking in the Historic Environment</li> <li>• GPA3 - Setting and Views</li> <li>• GPA4 - Enabling Development (forthcoming)</li> </ul>	

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0120	0120/07	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated		CE-D3 - Conserving Heritage Assets	<p>Policy CE-S4 and CE – D3</p> <p>We welcome these policies and text. You are obviously aware of the Good Practice Advice (GPA) notes which provides supporting information on good practice, particularly looking at the principles of how national policy and guidance can be put into practice. You may wish to update your references as three have now been published with a fourth on the way.</p> <ul style="list-style-type: none"> <li>• GPA1 - Local Plan Making</li> <li>• GPA2 - Managing Significance in Decision-Taking in the Historic Environment</li> <li>• GPA3 - Setting and Views</li> <li>• GPA4 - Enabling Development (forthcoming)</li> </ul>	
0120	0120/08	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated		CE-S6 - DESIGN & SUSTAINABLE CONSTRUCTION PRINCIPLES	<p>Policy CE-S6</p> <p>We welcome this policy and text.</p> <p>Design and Sustainable Construction Techniques. These policies are key to ensuring the built historic environment is conserved and enhanced, and form a fundamental part of Exmoor’s positive strategy for the historic environment.</p>	So while we welcome this policy and text, the opening criterion (1) of the policy should be more explicit about the historic environment’s significance and how it will be managed and its role in providing context to contemporary design.
0120	0120/09	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated		CE-D4 - Extensions	We welcome this policy and text.	

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0120	0120/10	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated		CC-S3 - PORLOCK WEIR COASTAL CHANGE MANAGEMENT AREA	Porlock Weir - Coastal change management Porlock Weir is identified as a conservation area with a number of grade II listed buildings referred to in the text for the Historic Environment Policies. The policies that specifically manage change upon Porlock, however, do not provide clarity on how to positively manage that change on the historic environment	While we welcome the active management of this area under threat from coastal changes, there should be more clarity over how that managed change will be extended to the historic environment.
0120	0120/11	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated		CC-S4 - REPLACEMENT DEVELOPMENT FROM COASTAL CHANGE MANAGEMENT AREAS	Porlock Weir - Coastal change management Porlock Weir is identified as a conservation area with a number of grade II listed buildings referred to in the text for the Historic Environment Policies. The policies that specifically manage change upon Porlock, however, do not provide clarity on how to positively manage that change on the historic environment.	While we welcome the active management of this area under threat from coastal changes, there should be more clarity over how that managed change will be extended to the historic environment.
0120	0120/12	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated		CC-D4 - Freestanding Solar Arrays		Criterion e might more usefully refer to “not harming the significance and setting of ....”, rather than “not detracting from” to better accord with the national policy.
0120	0120/13	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated		HC-D1 - Conversions to Dwellings in Settlements	We welcome this policy and text.	



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0120	0120/14	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated		HC-D2 - New Build Dwellings in Settlements	We welcome this policy and text.	
0120	0120/15	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated		HC-D17 - Replacement Dwellings	We welcome this policy and text.	
0120	0120/16	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated		SE-S3 - BUSINESS DEVELOPMENT IN THE OPEN COUNTRYSIDE	We welcome the principle behind this policy and text, however, many farm buildings and structures are historic and the implications of this policy and text should recognise this and for clarity there should be a cross reference with the relevant policies elsewhere.	Many farm buildings and structures are historic and the implications of this policy and text should recognise this and for clarity there should be a cross reference with the relevant policies elsewhere.
0120	0120/17	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated		RT-S1 - RECREATION AND TOURISM	We welcome this policy and text.	
0120	0120/18	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated		RT-D6 - Camping Barns	We welcome these policies and text.	
0120	0120/19	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated		RT-D7 - Certificated Caravan and Touring Caravan Sites	We welcome these policies and text.	

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0120	0120/20	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated		RT-D13 - Safeguarding Land Along Former Railways	We welcome these policies and text.	
0120	0120/21	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated		RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	We welcome these policies and text.	
0120	0120/22	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated		AC-S2 - TRANSPORT INFRASTRUCTURE	We welcome the principle behind this policy and text, however, much transport infrastructure can harm the historic environment, the implications of both policy and text should recognise this and for clarity there should be a cross reference with the relevant historic environment policy.	Much transport infrastructure can harm the historic environment, the implications of both policy and text should recognise this and for clarity there should be a cross reference with the relevant historic environment policy.
0120	0120/23	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated		AC-D1 - Transport and Accessibility Requirements for Development	We welcome this policy and text.	
0120	0120/24	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated		AC-D5 - Radio and Mobile Telecommunications Infrastructure	We welcome the principle behind this policy and text, though the implications of both should recognise the potential harm and for clarity there should be a cross reference with the relevant historic environment policy in the same way as the AC-D6 FIXED LINE TRANSMISSION INFRASTRUCTURE policy.	For clarity there should be a cross reference with the relevant historic environment policy in the same way as the AC-D6 FIXED LINE TRANSMISSION INFRASTRUCTURE policy.

Respondent no.	Representation no.	Name Organisation	Legal Compliance	Complies with Duty	Local Plan sound?	Comments relating to soundness	Local Plan Section Paragraph Policy or Map Number	Detail of representation	Modifications sought
0120	0120/25	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated		AC-D7 - Satellite Antennae	We welcome this policy and text.	
0121	0121/01	Mr Andrew Burns Natural England	Not Stated	Not Stated	Not Stated		Whole Plan	We have no further comments on the plan and recommend submission to the Secretary of State. Thank-you for the opportunity to comment on the Local Plan. We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.	