



Issues Raised by Respondents

Exmoor National Park Authority Response and Actions

EXMOOR NATIONAL PARK LOCAL PLAN 2011-2031

FOR SUBMISSION - MAY 2016

If you have any queries or questions relating to this document please get in touch with the Policy & Community Team using the contact details below:

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ISSUES RAISED BY RESPONDENTS - EXMOOR NATIONAL PARK AUTHORITY RESPONSE AND ACTIONS

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The following table summarises the representations which have raised particular issues through the consultation on the Publication Draft Exmoor National Park Local Plan (15 June – 31 July 2015). These representations have been considered by the Authority and a response is provided. Where necessary any proposed actions are also included that may be taken to address these concerns.

Respondent number/ Representation number	Name Company/ organisation	Legal Compliance	Complies with Duty	Plan sound?	Plan section, paragraph or policy	Summary of representation	Authority Response	Proposed Actions
0017 0017/01	Mr Duncan Jeffray Exmoor Society	Not Stated	Not Stated	Not Stated	Whole Plan	Positive comments regarding the Plan as a whole in relation to incorporating previous comments, supporting evidence, flexibility, clarity with precise cross-referencing. Some reservations regarding how the link between the Local Plan and Partnership Plan will be maintained given their differing timescales. Concern over whether the Local Plan could override the statutory purposes of the National Park and how this could be reconciled.	Policy GP1 is the overarching policy for the Local Plan, bringing the statutory purposes and sustainable development principles together to ensure that new development is consistent with National Park purposes and defining sustainable development in the National Park.	NO CHANGE REQUIRED
0058 0058/02	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	Whole Plan	BE considers that policies should be encouraging of inward migration and skills to maximise the social and economic benefits to sustain Exmoor's communities and entrepreneurial activity. Policies should encourage the reuse of existing buildings for business and residential purposes. The plan is felt to be unnecessarily prescriptive, very long and difficult to follow and apply and is considered to restrict rather than enable development. The detailed emphasis relating to the words 'small scale' throughout the plan is contrary to the NPPF and is recommended to be deleted where they relate to a policy context.	The Plan incorporates both strategic policies (previously incorporated within Regional Planning Guidance [regional spatial plans] and structure plans), and development management policies. The intention is to ensure that cross references assist the application process. The reuse of buildings for business and residential purposes is encouraged, as existing buildings are considered to be an important resource. The Plan seeks to ensure that the needs of Exmoor's residents and businesses are met by prioritising the provision of affordable housing for people in local affordable housing need, in addition to specialist housing, extended family dwellings and homes to meet the needs of rural land-based businesses. The words 'small-scale' are used throughout the Plan to ensure that development does not have unacceptable adverse impacts on the natural beauty, wildlife and cultural heritage of the National Park and is used in both the local and wider context. This is to ensure that certain developments do not harm the landscape character or visual amenity of the area, whilst ensuring that policies are flexible to enable local communities and businesses to thrive.	Proposed change: remove 'small-scale' from paragraph 5.113. Text will be reduced where necessary (see Schedule of Proposed Changes). ¹
0069 0069/12	Joe Keech Devon County Council	Not Stated	Not Stated	Not Stated	Whole Plan	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 for consistency.	Noted. The terms public rights of way and permissive paths are collectively referred to as rights of way.	NO CHANGE REQUIRED

¹ SD5 – ENPA (2016) Schedule of Proposed Changes – May 2016

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0071 0071/01	Mr Roger Watts	Not Stated	Not Stated	Not Stated	Whole Plan	Concern raised regarding the pressures of population, traffic and other impacts on the tranquillity of the National Park and how this can survive. It is considered important to withstand such pressures and channelling development to 'service centres' may be ultra vires. A further concern is that Exmoor ponies are not featured in the Plan. It is recommended that provision is made for review of the Plan due to profound changes that are likely to occur over the plan period.	Exmoor National Park Authority is a local planning authority and has the responsibility of producing a Local Plan for the Exmoor National Park area – including policies for minerals and waste. Part of the Plan includes a spatial strategy which provides the location for the majority of new development in the National Park – this is primarily focussed on meeting local needs for housing and business development. The spatial strategy includes Local Service Centres, which are identified as the largest centres in the National Park that provide a wide range of services to the settlements and the surrounding hinterland – because of their specific service role these settlements have been identified separately from Villages which have slightly fewer services. However, the policy approach in policy GP3 Spatial Strategy is exactly the same. Paragraph 3.39 explains that development should be of a scale that does not harm their form, setting or character – consistent with clause 2 of GP3 spatial Strategy. Section 11 Monitoring and Implementation Framework provides the indicators to monitor the policies on an annual basis – this will help to determine whether the policies are having their intended effect and if a review/partial review of the Plan is required.	NO CHANGE REQUIRED
0067 0067/01	The Crown Estate	Yes	Yes	No	1 Introduction	TCE recommend that the introduction should ensure that the statement 'proposals must accord with other relevant policies contained within the Plan' is included to avoid unnecessary cross referencing.	Paragraph 1.29 within the introduction includes the following text in bold: " The policies within this Local Plan constitute an overall approach to future development in the National Park and it is important that the Plan is read as a whole ". Policy GP1 Achieving National Park Purposes and Sustainable Development, clause 2.b) also requires policies to be read in combination.	NO CHANGE REQUIRED
0047 0047/02	Mr Mike Highfield Somerset County Council	Not Stated	Not Stated	Not Stated	Para. 1.4	Modifications suggested to para.1.4 to clarify the terminology relating to night-time tranquillity.	Noted - propose to include 'night time tranquillity' in the context of Exmoor's Dark Sky Reserve.	Proposed change: include reference to 'night time tranquillity' in the spatial portrait (paragraph 1.4).
0071 0071/02	Mr Roger Watts	Not Stated	Not Stated	No	Para. 1.4	Suggested that text is entered in para. 1.4 and GP1 to set the context for the areas remoteness, wildness and tranquillity.	Paragraph 1.2 includes reference to experiencing open space, peace, wildness and tranquillity, as does Vision Statements 1 and 6, and Objective 1 in Section 2. Policy GP1 Achieving National Park Purposes and Sustainable Development, clause 2.b) also requires planning proposals to demonstrate they do not conflict with the vision and objectives.	NO CHANGE REQUIRED.

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0058 0058/01	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	2 Vision, Objectives and Strategic Priorities	The strategic priorities within section 2 are supported. Business Exmoor suggests that additional wording is added to apply a presumption in favour of sustainable development as contained in the NPPF. A further clause is suggested within the strategic priorities to enable the provision of housing for people employed within the National Park on a short and long term residential basis to enable businesses to recruit and retain staff across all levels.	The 'presumption in favour of sustainable development' is set out in the NPPF (para. 14) and therefore is a material consideration in planning decisions. There is no longer a requirement for Local Plans to include this presumption. The provision of housing is focused on the delivery of local needs affordable housing, as set out in the strategic priorities, which includes those who need to live near to their place of work (HC-S3 Local Occupancy Criteria). Policies also provide for some market housing to enable the delivery of local needs affordable housing which may also help to meet the needs of employees within the National Park.	NO CHANGE REQUIRED
0068 0068/01	Mr James Shorten Geo	Not Stated	Not Stated	No	Vision 5 - page 9	Concern is raised regarding Vision Statement 5 of the Plan - that this sets a false starting point for the Plan as the potential for and uptake of sustainable solutions does not equate to their uptake and use. Environmental footprints are considered to be twice as high as is truly sustainable and this is worse in rural areas. It is recommended that the aspiration is directed to new policy approaches and break new ground as an exemplar of sustainable development (as envisaged in the National Park Circular).	The Vision is written as a vision of Exmoor National Park in 2031. The Plan encourages sustainable development in terms of new development and land use through the implementation of Local Plan policies. New policy approaches have been developed to help local communities and businesses address their needs in a way which is consistent with National Park statutory purposes. Although sustainable solutions can be and are encouraged this is often as a result of individual choice and cannot be dictated.	NO CHANGE REQUIRED
0065 0065/01	Mr David Latham Porlock Parish Council	Not Stated	Not Stated	Not Stated	2 Vision, Objectives and Strategic Priorities Para. 2.3	Question whether 'abilities' in the context of Objective 8 includes 'disabled' and to ensure this term is included where relevant in the Plan.	The term 'all abilities' includes people with disabilities and this term is included in relation to policies AC-S3 Traffic Management and Parking and AC-D3 Parking Provision and Standards, to ensure the needs of people with disabilities are taken into account when managing traffic and providing parking. Policy CE-S7 Design and Sustainable Construction Principles also ensures that new development has regard to inclusivity and accessibility.	Proposed change: include the term 'all abilities' in the Glossary.
0120 0120/02	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated	3 General Policies	Historic England is broadly supportive of the General Policies in section 3, but considers that reference to historic environment would be more appropriate than the broad term cultural heritage - to ensure consistency with the NPPF. It is also recommended that the Plan identifies those policies which are strategic to assist those preparing Neighbourhood Plans.	The Plan does clearly identify the strategic policies and this is explained in the Introduction of the Plan. It is noted that the term historic environment should be clearly explained in the context of 'cultural heritage'. The term 'cultural heritage' is used in relation to the wording of the statutory purposes and this is also identified in paragraph 115 of the NPPF. This term will also be defined in the Glossary of the Local Plan.	Proposed change: clarify the term 'historic environment' in the context of 'cultural heritage'. Include the term 'Cultural Heritage' in the Glossary.

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0058 0058/03	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	GP1 - GENERAL POLICY: NATIONAL PARK PURPOSES AND SUSTAINABLE DEVELOPMENT	Modification suggested to GP1 criterion 3 to include reference to enabling businesses to grow and develop.	Policy GP1 Achieving National Park Purposes and Sustainable Development is a general policy which sets out the criteria to ensure new development is consistent with these purposes and define sustainable development in the National Park. Criterion 3.c) includes reference to strengthening employment opportunities. Policy SE-S1 A Sustainable Exmoor Economy is the strategic policy for business development and encourages economic development, including the growth of existing businesses where it will not have an adverse impact on the National Park. Strategic Priority 3 is also relevant "To enable a diverse and resilient local economy through locally generated growth and sustainable development..."	NO CHANGE REQUIRED
0058 0058/04	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	Paras. 3.24-3.26	BE feel that part of the supporting text to GP2 Major Development is not in accordance with the NPPF and should be deleted.	The supporting text to GP2 provides additional clarification to define the term 'major development' in the context of paragraph 116 of the NPPF. The NPPF does not define 'major development' in this context. The text is based on evidence arising from case history and outlined in <i>Maurici, J. (2014) Majors Opinion 2 - in the matter of the National Planning Policy Framework and in the matter of the South Downs National Park Authority</i> . The NPPF presumes against major development within the National Park. The policy provides an interpretation of major development in the context of the NPPF, which will not necessarily be consistent with the Development Procedure Order definition of major development for the categorisation of planning applications. This will be a matter of planning judgement.	NO CHANGE REQUIRED
0044 0044/01	Mr Michael Calder National Trust	Not Stated	Not Stated	No	Para. 3.25 GP2 - GENERAL POLICY: MAJOR DEVELOPMENT	The National Trust considers the Plan is not sound (not effective) in relation to policy GP2 and supporting text. Further consideration is recommended to be given to the local context and the potential for development to harm the natural beauty and special qualities of the National Park. The Trust seek to modify the Plan by inserting additional text into para. 3.26 to clarify this statement.	The NPPF does not define 'major development' in the context of National Parks (paragraph 116). The supporting text is based on evidence arising from case history and outlined in <i>Maurici, J. (2014) Majors Opinion 2 - in the matter of the National Planning Policy Framework and in the matter of the South Downs National Park Authority</i> . It is considered that the suggested amendment to paragraph 3.26 to provide clarification to major development in a 'local context' and 'the potential impacts on the National Park' is helpful and similar wording will be incorporated.	Proposed change: include text within paragraph 3.26 to provide explanation of major development in the local context and the potential to harm the National Park.

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0071 0071/03	Mr Roger Watts	No	Not Stated	No	Paras. 3.38-3.38	Concern that development will be channelled from Villages to Local Service Centres which may be counter to the intentions of establishing National Parks and ultra vires. The settlement hierarchy could be therefore struck down. The effect is to extract Dulverton, Lynton & Lynmouth and Porlock from the National Park for the purposes of housing and other development which would disadvantage these settlements and the National Park. Modifications seek to delete 'service centres' and describe them as 'attractive small historic towns'. With additional descriptive text to ensure development is compatible with National Park purposes, in addition to text relating to landscape capacity.	The spatial strategy includes Local Service Centres which are identified as the largest centres in the National Park that provide a wide range of services to the settlements and the surrounding hinterland – because of their specific service role these settlements have been identified separately from Villages which have slightly fewer services. However, the policy approach in policy GP3 Spatial Strategy is exactly the same. Paragraph 3.39 explains that development should be of a scale that does not harm their form, setting or character – consistent with clause 2 of GP3 spatial Strategy. Paragraph 3.39 also reinforces the fact that the Local Service Centres are not any larger than many villages elsewhere in Devon and Somerset and it is their relative isolation, the extent of the area they serve and the influence of tourism which sustains the level of services in these settlements. The term 'Local Service Centres' is considered to reflect the role of Dulverton, Lynton & Lynmouth and Porlock in the National Park context.	NO CHANGE REQUIRED
0058 0058/05	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	GP3 - GENERAL POLICY: SPATIAL STRATEGY	Business Exmoor consider that the final criterion of GP3 should not just refer to rural land-based businesses, but all types of business and enterprise in rural areas both through conversion of existing buildings and well designed new buildings.	Clause 3.d) of policy GP3 Spatial Strategy accurately reflects the circumstances where new build development is considered to be acceptable in relation to the operation of rural land-based businesses, new rural worker or succession farm dwellings, or self-build affordable homes in small settlements that have at least one service (a shop, pub or community meeting place). Policies within 'Section 7 A Sustainable Economy' provide further detail regarding new business development including within the open countryside. New build business development is considered to be more suitable in sustainable locations identified in the spatial strategy as Local Service Centres, Villages and Porlock Weir. The Plan provides flexibility for new buildings within the curtilage of dwellings to meet the needs of home-based businesses – which reflects the fact that 37% of people aged 16 or over in employment, work at or from home.	NO CHANGE REQUIRED

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0067 0067/04	The Crown Estate	Yes	Yes	No	GP3 - GENERAL POLICY: SPATIAL STRATEGY	The need for a spatial strategy and retention of a settlement hierarchy is understood. However the Plan is criticised by not providing more detailed information with regard to the inclusion of settlements within the hierarchy. TCE consider that Withycombe is worthy of inclusion as a Village within the hierarchy. In relation to development in the open countryside further clarity is required in relation to criteria a) to h) whether these are exclusive or inclusive. TCE are supportive of the innovative approach to delivering rural housing through enabling self-build opportunities in the open countryside. It is suggested that specific reference is made in the text to policy HC-D5 Custom/Self Build Local Need Housing in Rural Communities. TCE support the decision not to define development boundaries and take a common sense approach to appropriate development.	The evidence [Spatial Strategy – Local Plan Topic Paper 2015] shows that Withycombe, like many other small communities on Exmoor has relatively few local services, and in addition to this only a very small proportion of the settlement lies within the National Park boundary. The remainder of the settlement lies within West Somerset local planning authority area and is not recognised as an identified settlement within their Submission Draft Local Plan. However, clause 3.d) of policy GP3 Spatial Strategy does provide opportunities for self build local affordable housing in sustainable locations and references policy HC-D5 Custom/Self Build Housing in Rural Communities accordingly - which sets out criteria to enable the provision of self build affordable homes within rural communities that have at least one service (a shop, pub or community meeting place) and Withycombe would meet these criteria. The criteria listed in a) to h) are in para 3.44 of the supporting text – the use of the word ‘or’ after criteria g) indicates that they are not intended to be inclusive.	NO CHANGE REQUIRED
0063 0063/03	Sue Green Home Builders Federation Ltd	Not Stated	Not Stated	No	GP5 - GENERAL POLICY: SECURING PLANNING BENEFITS - PLANNING OBLIGATIONS	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.	Noted.	NO CHANGE REQUIRED
0067 0067/05	The Crown Estate	Yes	Yes	No	GP5 - GENERAL POLICY: SECURING PLANNING BENEFITS - PLANNING OBLIGATIONS	Whilst TCE acknowledge the amendments to the policy and the difficulties in forming this policy, it is considered that the policy is vague and the potential for a cross boundary approach has not been explored. The policy provides little assurance to developers with regards to the type of development that would require a CIL payment or level of charge that would be incurred. There is a need for a charging schedule to enable developers to accurately assess the viability of developments in the park.	The current intention is not to have a CIL as the Infrastructure Delivery Plan does not identify any particular infrastructure needs to be funded over the Plan period. The policy provides the flexibility to review the need for CIL subject to changing circumstances. The main financial contributions from development will be required for affordable housing where in exceptional circumstances, it cannot be feasibly provided on site. Further guidance in relation to these contributions will be provided in a forthcoming Housing supplementary planning document (SPD).	NO CHANGE REQUIRED
0069 0069/01	Joe Keech Devon County Council	Not Stated	Not Stated	Not Stated	GP5 - GENERAL POLICY: SECURING PLANNING BENEFITS - PLANNING OBLIGATIONS	DCC highlight that Combe Martin primary school is nearing capacity and contributions towards education provision may need to be sought if any significant growth is proposed within the catchment of the school. School transport costs will be requested to mitigate the impact of development as these costs are not provided by central government.	Noted - it is considered unlikely that level of development in the Combe Martin primary school catchment area of the National Park would trigger such a contribution.	NO CHANGE REQUIRED

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0069 0069/09	Joe Keech Devon County Council	Not Stated	Not Stated	Not Stated	Para. 4.26 (and section 20 of Duty to Cooperate Statement)	DCC suggest that reference to the Devon Landscape Policy Group could usefully be included here as referred to in the Devon Duty to Cooperate Protocol.	Noted - it is not considered that the reference is necessary given that the paragraph includes reference to working 'with partners' - it would otherwise necessitate other partners to be listed.	NO CHANGE REQUIRED
0044 0044/03	Mr Michael Calder National Trust	Not Stated	Not Stated	No	Para. 4.15 CE-S1 - LANDSCAPE CHARACTER	The National Trust considers the Plan is not sound (not effective or consistent with national policy) in relation to policy CE-S1 and protection of the Heritage Coast. The Trust considers that as the settlements have no development boundaries there are implications for the protection of the undeveloped coast which are solely reliant on policy CE-D1 which is not cross-referenced in para. 4.15 relating to the Heritage Coast.	The concerns of the National Trust in relation to the Heritage Coast and accurate cross-referencing of the relevant policies are noted. Policy GP3 Spatial Strategy ensures that new development within or well related to settlements is of a scale proportionate to the settlement size and positively responds to surrounding landscape character, settlement form and pattern. A reference to policy CE-D1 Protecting Exmoor's Landscapes and Seascapes will be included in paragraph 4.15 as a 'proposed change'.	Proposed change: add reference to policy CE- D1 Protecting Exmoor's Landscapes and Seascapes to paragraph 4.15
0044 0044/02	Mr Michael Calder National Trust	Not Stated	Not Stated	No	Paras. 2.3; 4.15 CE-D1 - Protecting Exmoor's Landscapes and Seascapes	The National Trust considers the Plan is not sound (not effective) in relation to section 4 objectives and specifically policy CE-D1. The Trust considers that the term seascape should be included in within the Plan Objectives listed under para. 2.3, and the Seascape Character Assessment commissioned by key partners should be tied into the Local Plan through policy CE-S1 - to address Landscape 'and Seascape' Character.	The Seascape Character Assessment has only been recently completed and was signed off in December 2015. However as the National Park Authority is a key partner in commissioning this assessment it would be prudent to include the term 'seascape' within the title of policy CE-S1, and to reference any extant Seascape Character Assessment in clause 2 of the policy - as a 'proposed change'.	Proposed change: add the term 'seascape' to policy title CE-S1 and at the end of clause 2 add 'and seascape character areas identified in Seascape Character Assessment'.
0044 0044/04	Mr Michael Calder National Trust	Not Stated	Not Stated	No	CE-D1 - Protecting Exmoor's Landscapes and Seascapes	The National Trust considers the Plan is not sound (not effective or consistent with national policy) in relation to policy CE-D1 and protection of the Heritage Coast. The Trust considers that as the settlements have no development boundaries there are implications for the protection of the undeveloped coast which are solely reliant on policy CE-D1 which is not cross-referenced in para. 4.15 relating to the Heritage Coast. Modifications are sought to include this cross-reference.	The concerns of the National Trust in relation to the Heritage Coast and accurate cross-referencing of the relevant policies are noted. Policy GP3 Spatial Strategy ensures that new development within or well related to settlements is of a scale proportionate to the settlement size and positively responds to surrounding landscape character, settlement form and pattern. A reference to policy CE-D1 Protecting Exmoor's Landscapes and Seascapes will be included in paragraph 4.15 as a 'proposed change'.	Proposed change: add reference to policy CE- D1 Protecting Exmoor's Landscapes and Seascapes to paragraph 4.15
0069 0069/10	Joe Keech Devon County Council	Not Stated	Not Stated	Not Stated	CE-D1 - Protecting Exmoor's Landscapes and Seascapes	DCC suggest that the phrase "professional landscape appraisal" could be amended to "Landscape and Visual Impact Assessment carried out by a suitably qualified landscape professional" to ensure consistency with the Devon Waste Plan and Minerals Plan.	Noted - the terminology will be amended as suggested by DCC - as a 'proposed change' within clause 4 of the policy and explanatory text in paragraph 4.27 of the Plan.	Proposed change: replace 'provide a professional landscape appraisal' with 'Landscape and Visual Impact Assessment' in clause 4 of policy CE-D1. Provide explanatory text within paragraph 4.27.

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0043 0043/07	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	Paras. 4.44-4.50	Support subject to the inclusion of the North Devon Biosphere Reserve within the section relating to Internationally and Nationally Designated Biodiversity Assets.	These paragraphs (4.44-4.50) directly relate to international and national sites designated for their nature conservation importance that reflect the statutory obligations concerning European sites, SSSIs and protected species. Although the plan recognises that the Biosphere Reserve is an international designation it does not have the same statutory obligations, this is the reason that it is included within the section for green infrastructure and promotion of ecosystem services (paragraph 4.76) which are considered to complement the vision for the Biosphere Reserve transition zone.	NO CHANGE REQUIRED
0033 0033/01	Mr Tim Hambly Environment Agency	Yes	Yes		Para. 4.63	Reference the Environment Agency in para. 4.63.	Noted - include reference to the Environment Agency as a 'proposed change' to the Plan.	Proposed change: reference the Environment Agency in paragraph 4.63
0023 0023/02	Mr Justin Milward Woodland Trust	Yes	Yes	No	CE-S3 - BIODIVERSITY AND GREEN INFRASTRUCTURE	The Woodland Trust support paragraph 3 of CE-S3 relating to ancient woodland and veteran trees, and the expansion of green infrastructure networks (para 7). However, given the importance of trees and woodlands the Trust would like to see a separate policy for trees and woods and suggested wording is included within the modifications.	The Plan has incorporated amendments suggested by the Woodland Trust in relation to ancient woodlands and veteran trees made in relation to the Draft Local Plan consultation (Nov-Dec 2013) - where a separate policy was not at that time indicated as a necessary component of the Plan. Policy CE-S3 Biodiversity and Green Infrastructure is considered to adequately afford a high level of protection to these biodiversity assets within clause 3 specifically and paras 4.49-50 and 4.64.	NO CHANGE REQUIRED
0057 0057/01	Dr Ueli Zellweger	Not Stated	Not Stated	Not Stated	CE-S3 - BIODIVERSITY AND GREEN INFRASTRUCTURE	Concern raised in relation to the absence of the biodiversity importance of rivers and streams in the Plan which is suggested to be integrated within section 4 of the Plan.	Rivers are identified as a Priority Freshwater Habitat in Table 4.1 Exmoor's Priority Habitats, of which there are 29 priority habitats in total. The supporting text also references the Exmoor Wildlife Research and Monitoring Framework which lists Exmoor's priority habitats and species.	NO CHANGE REQUIRED
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	The Park is considered to have a wider and nationally important role in terms of water quality and concern is raised that no account has been made regarding external factors affecting habitats and species within the Park. Plan should consider external factors which should be demonstrated through discussion of cross boundary issues with consultees. Main concern is the links between protection of priority species and habitats and the planning system and the Plan does not convey the regard for these assets. Need to further clarity relating to how these species and habitats will be considered in practice.	Strategic cross-boundary issues are discussed with adjoining local planning authorities and other organisations through the Duty to Cooperate. Each local planning authority is required to produce a Sustainability Appraisal (incorporating a Strategic Environmental Assessment) and a Habitats Regulations Assessment of their Local Plan on their area or in combination with plans, policies and programmes of adjoining areas. Any issues raised through these processes should be addressed through recommendations for amendments to the plan or the consideration of reasonable alternatives. Further clarification to enable planning proposals to have adequate regard to priority habitats and species in the National Park (with reference to the wildlife checklist and guidance) will be provided.	Proposed changes: Role of the National Park and the protection of natural assets in its wider context to be included in the spatial portrait (Section 1). Amendment to text in paragraph 4.61 to reference the Exmoor Wildlife Checklist and guidance.

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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	SWT support the policy approach to maintain coherent, resilient ecological networks. Some suggested modifications include changing the terminology from 'the matrix' areas to 'dispersal areas' within the supporting text and policy CE-S3.	Noted - terminology will be changed from 'the matrix' to 'dispersal areas' to be consistent with the finalised ecological network methodology.	Proposed change: amend references to 'the matrix' to 'dispersal areas' in policy CE-S3 and the supporting text.
0120 0120/03	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated	CE-S3 - BIODIVERSITY AND GREEN INFRASTRUCTURE	The interrelationship of the historic environment with green infrastructure and the opportunities it offers in mitigating harm to the historic environment should be recognised more fully.	Noted - the opportunities that green infrastructure can provide in mitigating harm to the historic environment will be explained in the supporting text to CE-S3.	Proposed change: provide explanation regarding green infrastructure and opportunities to enhance the historic environment.
0069 0069/11	Joe Keech Devon County Council	Not Stated	Not Stated	Not Stated	CE-D2 - Green Infrastructure Provision	It is recommended that this policy reflects the Guiding Principles of the Devon GI Strategy, in particular Principle 1 to ensure GI is considered at the earliest stage.	Green infrastructure (GI) is encouraged and is required to be provided as an integral part of new development in policy CE-S3 Biodiversity and Green Infrastructure and CE-D2 Green Infrastructure Provision. It is considered that the supporting text could be amended in paragraph 4.82 to reflect the Devon GI Strategy Principle 1.	Proposed change: insert the words "Green infrastructure provision should be considered at the earliest stage" in paragraph 4.82.
0120 0120/05	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated	Para. 4.94	Suggest that the term 'adverse impacts' in para 4.94 is replaced with the term 'harm' to be consistent with the NPPF.	Noted - terminology will be changed from 'adverse impacts' to 'harm' to be consistent with the NPPF.	Proposed change: to replace 'adverse impacts on' with 'harm to'.
0044 0044/06	Mr Michael Calder National Trust	Not Stated	Not Stated	No	CE-S4 - CULTURAL HERITAGE AND HISTORIC ENVIRONMENT	The National Trust considers the Plan is not sound (not effective or consistent with national policy) in relation to policy CE-S4. The Trust considers that criterion 4 of the policy should require a systematic approach to the assessment of the impact of development proposals on the setting of heritage assets is required. The Trust have suggested revised wording to reflect this view.	The Authority recognises the importance of ensuring that the setting of heritage assets is properly assessed in relation to the potential impacts of development proposals. Policy CE-D3 Conserving Heritage Assets specifically has regard to the setting of heritage assets in clause 3. The Historic England good practice advice note relating to the setting of heritage assets is referenced in the supporting text. It is considered that this could be more specific and the text suggested by the Trust could be reflected in the supporting text.	Proposed change: reference the Historic England good practice advice note 3 and reflect the text suggested by the National Trust in para 4.110.
0120 0120/06	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated	CE-S4 - CULTURAL HERITAGE AND HISTORIC ENVIRONMENT	Policy is supported - references to recent publication of Historic England's good practice advice is recommended.	Noted - references will be updated.	Proposed change: update reference to good practice advice note.
0120 0120/07	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated	CE-D3 - Conserving Heritage Assets	Policy is supported - references to recent publication of Historic England's good practice advice is recommended.	Noted - references will be updated.	Proposed change: update reference to good practice advice note.

ISSUES RAISED BY RESPONDENTS - EXMOOR NATIONAL PARK AUTHORITY RESPONSE AND ACTIONS

Respondent number/ Representation number	Name Company/ organisation	Legal Compliance	Complies with Duty	Plan sound?	Plan section, paragraph or policy	Summary of representation	Authority Response	Proposed Actions
0043 0043/13	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	CE-S5 - PRINCIPLES FOR THE CONVERSION OR STRUCTURAL ALTERATION OF EXISTING BUILDINGS	Support policy CE-S5 subject to the policy referring to sustainable location criteria consistent with the objectives of the NPPF.	Policy CE-S5 sets out the key principles relating specifically to the conversion or structural alteration of existing buildings. Clause 1.a) states that the proposal for the conversion or change of use of existing buildings should accord with other policies in this Plan in terms of the intended use - these policies will also indicate the most appropriate location. For clarification it is suggested that the words "sustainability and" are inserted prior to "the intended use".	Proposed change: Insert the words "sustainability and" prior to "intended use" in clause 1.a) of policy CE-S5 Principles for the Conversion or Structural Alteration of Existing Buildings.
0065 0065/02	Mr David Latham Porlock Parish Council	Yes	Yes	No	CE-S5 - PRINCIPLES FOR THE CONVERSION OR STRUCTURAL ALTERATION OF EXISTING BUILDINGS	Question whether traditional materials are always most appropriate in certain conditions - seek to modify the policy to include flexibility where more modern materials would be sustainable.	It is considered that the use of traditional materials is justified in relation to the conversion and structural alteration of traditional buildings to ensure the historic fabric and architectural interest of these buildings are conserved in accordance with National Park statutory purposes.	NO CHANGE REQUIRED

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Respondent number/ Representation number	Name Company/ organisation	Legal Compliance	Complies with Duty	Plan sound?	Plan section, paragraph or policy	Summary of representation	Authority Response	Proposed Actions
0067 0067/07	The Crown Estate	Yes	Yes	No	CE-S5 - PRINCIPLES FOR THE CONVERSION OR STRUCTURAL ALTERATION OF EXISTING BUILDINGS	TCE consider the restrictions are too strict and likely to stifle development that would allow for the preservation and enhancement of traditional buildings. It is important that the long term viability of these buildings is secured through conversion to an alternative use. It is felt that conversions to dwellings in the open countryside (HC-D7) is the most likely policy to be applied which is considered to place a great restriction on potential solutions to the retention of these buildings. The policy should have greater flexibility to be in line with paragraph 55 of the NPPF regarding isolated homes in the open countryside.	Policy CE-S5 sets out the key principles relating specifically to the conversion or structural alteration of existing buildings but does not stipulate the use of such buildings - this is determined by other policies in the Plan. The response refers to paragraph 55 of the NPPF. The NPPF sets out policy relevant to the work of all planning authorities. Its content must be balanced against the content of other relevant policy and Acts of Parliament. In the National Park's case the purposes of National Parks and duties of relevant bodies set out in the Environment Act 1995 (sections 61 and 62) carry great weight and in themselves provide the context for interpreting policy. Because of the overriding constraints within National Parks recognised in the NPPF, the limited opportunities for housing development should focus on the delivery of housing to address local and affordable housing needs. This is recognised in the National Parks Circular (paragraph 76) as a critical link to the provision of support for commercial and business development in the Parks. Paragraph 78 of Circular 2010 "... The expectation is that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services." It is clear that the expectation in national policy specifically for National Parks is that new housing should be focused on affordable housing needs. Policy HC-D7 Conversions to Dwellings in the Open Countryside ensures that existing buildings in the most sustainable locations are an important resource which can be utilised to provide for the housing needs of Exmoor's communities through the provision of local affordable housing, extended family dwellings, rural worker dwellings or succession farm dwellings. It is not considered appropriate to provide for open market dwellings in the open countryside when the priority is addressing the housing needs of Exmoor's communities including those within smaller settlements (not identified in the spatial strategy) and on farmsteads. Local need affordable homes in the open countryside have been delivered through adopted Local Plan policies.	NO CHANGE REQUIRED
0065 0065/03	Mr David Latham Porlock Parish Council	Yes	Yes	Yes	4 Conserving and Enhancing Exmoor Para. 4.145	Issue raised in relation to limiting the insensitive use of highway signage and street furniture - need assurance that review and enforcement measures will take place.	Noted	NO CHANGE REQUIRED.

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Respondent number/ Representation number	Name Company/ organisation	Legal Compliance	Complies with Duty	Plan sound?	Plan section, paragraph or policy	Summary of representation	Authority Response	Proposed Actions
0046 0046/01	Mr Paul Hickson Somerset County Council	Not Stated	Not Stated	No	Para. 5.112 CE-S6 - DESIGN & SUSTAINABLE CONSTRUCTION PRINCIPLES	SCC suggest that the supporting text to policy CE-S6 could refer to para. 5.112 relating to waste and the use of waste audits.	Noted - it is considered sensible to provide a cross-reference and explanation in the supporting text under the sub-heading 'Sustainability Standards' to para. 5.112 and policy CC-S6 Waste Management relating to waste collection, storage, and the use of waste audits.	Proposed changes: Move text in paragraph 5.112 relating to sustainability issues for waste after para. 4.159. Amend policy CE-S6 clause 2.d) to include "access to and" after "adequate".
0053 0053/01	Mr David Alford West Somerset Council	Not Stated	Not Stated	Not Stated	CE-S6 - DESIGN & SUSTAINABLE CONSTRUCTION PRINCIPLES	WSC state that criterion 2 of policy CE-S6 should clarify how a developer should demonstrate a reduction in carbon emissions. It is suggested that further guidance is needed in support of this statement specifically referring to the Standard Assessment Procedure (SAP) tool at the design stage.	The concerns raised by WSC in relation to the wording of clause 2 of the policy are noted. The Deregulation Act 2015 has the intended consequence that additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings cannot be applied. It is considered that the additional guidance regarding SAP to demonstrate a reduction in carbon emissions would be contrary to planning practice guidance and the amendments to the Planning and Energy Act 2008 in the Deregulation Act 2015. To be consistent with legislative requirements and planning practice guidance it is considered that the wording of clause 2 should be amended to 'encourage' reductions in carbon emissions rather than 'demonstrate'.	Proposed changes: amend the policy to encourage proposals that reduce carbon emissions, rather than requiring proposals to demonstrate this measure.
0061 0061/05	Mr Mervyn Orchard-Lisle Monksilver Parish Council	Not Stated	Not Stated	Not Stated	CE-S6 - DESIGN & SUSTAINABLE CONSTRUCTION PRINCIPLES	Concern raised in relation to policy CE-S6 not pursuing a more low carbon housing stock.	Clause 2 of the policy includes sustainable construction measures such as the reduction of carbon emissions and future proofing against climate change impacts. National planning policy requirements prevent local planning authorities from setting local standards for the construction, internal layout and performance of new dwellings.	NO CHANGE REQUIRED.

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0120 0120/08	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated	CE-S6 - DESIGN & SUSTAINABLE CONSTRUCTION PRINCIPLES	Policy is supported. Suggest that the significance of the historic environment is more explicit in the policy - particularly in relation to its management and providing context to contemporary design.	Noted - the policy and supporting text will be updated to reflect the important role the historic environment has in influencing high quality design. The supporting text to this policy currently refers to how the historic environment can provide important design references.	Proposed change: amend policy to reference to the historic environment.
0017 0017/06	Mr Duncan Jeffray Exmoor Society	Not Stated	Not Stated	Not Stated	CE-D5 - Advertisements and Private Road Signs	There is some concern regarding whether there are sufficient controls in policy CE-D5 Advertisements and Private Road Signs in relation to signage in the open countryside.	The Plan should be read as a whole. The policy (CE-D5 Advertisements and Private Road Signs) intends to ensure that the impact of advertisements and private roads signs is minimised. Clause 1.c) has particular regard to any individual, cumulative, or sequential impact on landscape character and local distinctiveness of the area. Furthermore, policies that seek to conserve and enhance landscape (CE-S1 Landscape Character and CE-D1 Protecting Exmoor's Landscapes and Seascapes) will also to apply to any proposals.	NO CHANGE REQUIRED
0056 0056/02	Jacky Walters Parracombe Parish Council	Not Stated	Not Stated	Not Stated	CE-D5 - Advertisements and Private Road Signs	A problem with attaining a village amenities sign is raised.	Policy CE-D5 Advertisements and Private Road Signs enables the provision of joint/community advertisements or signs which are preferable to individual signs that may result in a cluttered appearance in the landscape.	NO CHANGE REQUIRED
0058 0058/06	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	CE-S7 - SMALL SCALE WORKING OR RE-WORKING FOR BUILDING AND ROOFING STONE	BE consider that criterion 1.f) should be deleted as it would be inconsistent with the policy enabling the use of locally sourced materials.	Criterion 1.f) ensures that where there are existing quarries close to the National Park boundary that may provide a 'locally distinctive source' of stone that is similar geologically to the area where it is required; a sequential approach would be a more sustainable and suitable alternative to working a new small scale quarry within the National Park. Although it is recognised that such opportunities are restricted to certain geological areas.	NO CHANGE REQUIRED
0043 0043/16	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	CE-S8 - MINERALS SAFEGUARDING AREAS	Objection to policy CE-S8 - the extent of safeguarded areas needs to be shown more clearly on the Policies Map to be effective for development management.	The ENPA has reconsidered its position regarding minerals safeguarding areas. Exmoor National Park has no active quarries and an extensive resource of building stone to meet locally derived needs for building stone within the National Park. Low levels of development are unlikely to sterilise future small scale extraction. Therefore, minerals safeguarding areas are considered not to be needed.	Proposed changes: amend text to explain why MSAs are not required in the National Park context. Delete CE- S8 Minerals Safeguarding Areas.
0046 0046/02	Mr Paul Hickson Somerset County Council	Not Stated	Not Stated	No	CE-S8 - MINERALS SAFEGUARDING AREAS	SCC suggest that the wording of policy CE-S8 could be clarified by reviewing the text of the first sentence - moving 'not' to precede 'permitted'.	See comments above regarding the proposed deletion of CE-S8.	NO CHANGE REQUIRED

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0057 0057/02	Dr Ueli Zellweger	Not Stated	Not Stated	Not Stated	CE-S9 - MAJOR MINERAL EXTRACTION	It is requested that text is included in relation to policy CE-S9 to ensure fracking of any scale would not be permitted within the National Park.	From the evidence currently available it is considered that a small area of Exmoor National Park would be included within petroleum licensing areas for fracking operations for shale gas. However, if proposals were to arise in the future they would be determined using policy CE-S9 as such operations would still be considered to be mineral extraction. Regulations preclude any fracking operations within National Parks to the depth of 1200m. However, as research is ongoing in this field it would be prudent to include mineral exploration in the supporting text and in policy CE-S9 Major Mineral Extraction.	Proposed changes: Supporting text and policy CE-S9 Major Mineral Extraction to be amended to consider all other types of mineral development including exploration, appraisal and processing.
0023 0023/03	Mr Justin Milward Woodland Trust	Yes	Yes	No	CC-S1 - CLIMATE CHANGE MITIGATION AND ADAPTATION	The Woodland Trust are pleased that CC-S1 supports the use of woodland, but considers that the policy does not fully explain the benefits it can provide in terms of improving water quality and river ecology, and reducing flood risk and the impact of drought. Links to evidence and policy examples are provided. Modifications sought include reference to tree planting in 1.d) and the management and creation of woodland in 2.c) of policy CC-S1.	It is considered that adequate references to the role of woodlands in reducing flood risk and carbon sequestration are reflected in the supporting text to policy CC-S1 Climate Change Mitigation and Adaptation and that sub-clauses 1.d) and 2.c) reflect land management measures of which woodland management and creation is a component. Furthermore the role of woodland has for climate change adaptation and mitigation is also recognised in the supporting text to policies CE-S3 Biodiversity and Green Infrastructure and CE-D2 Green Infrastructure Provision.	NO CHANGE REQUIRED
0033 0033/02	Mr Tim Hambly Environment Agency	Yes	Yes		Para. 5.23	Paragraph 5.23 should be updated in relation to sustainable drainage and Lead Local Flood Authority roles.	Noted – it is proposed that amendments will be made to the footnote to paragraph 5.23 to reflect Lead Local Flood Authority (LLFA) roles in relation to sustainable drainage systems.	Proposed change: amend footnote 173 to paragraph 5.23 to include reference to LLFA roles.
0043 0043/19	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	CC-D1 - Flood Risk	Support policy CC-D1 subject to clarification on whether criteria 1 a) - e) are inclusive or exclusive.	Noted. Propose to amend policy CC-D1 to add 'and' to the end of sub-clause 1.d) to make the criteria inclusive.	Proposed change: insert 'and' after clause 1.d).
0044 0044/05	Mr Michael Calder National Trust	Not Stated	Not Stated	No	Para. 5.31 CC-S2 - COASTAL DEVELOPMENT	The National Trust considers the Plan is not sound (not effective or consistent with national policy) in relation to policy CC-S2 and protection of the Heritage Coast. The Trust considers that as the settlements have no development boundaries there are implications for the protection of the undeveloped coast which are solely reliant on policy CE-D1 which is not cross-referenced in para. 5.31 relating to the undeveloped coast and policy CC-S2. Modifications are sought to include these cross references.	The concerns of the National Trust in relation to the Heritage Coast and accurate cross-referencing of the relevant policies are noted. Policy GP3 Spatial Strategy ensures that new development within or well related to settlements is of a scale proportionate to the settlement size and positively responds to surrounding landscape character, settlement form and pattern. A reference to policy CE-D1 Protecting Exmoor's Landscapes and Seascapes is proposed to be included in paragraph 5.32.	Proposed change: insert reference to CE-D1 Protecting Exmoor's Landscapes and Seascapes within para. 5.32.

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0052 0052/10	Anthony Meakin Lynton & Lynmouth Town Council	Not Stated	Not Stated	Not Stated	CC-S3 - PORLOCK WEIR COASTAL CHANGE MANAGEMENT AREA	LLTC seek to include Lynmouth within policy CC-S3 and the designation of a coastal change management area following impacts of 2013/14 floods.	A Coastal Change Management Area has been designated in Porlock Weir in response to the North Devon & Somerset Shoreline Management Plan for Hartland Point to Anchor Head which changes the coastal policy from a 'Hold the Line' policy to 'No Active Intervention' which implies that assets at Porlock Weir would become at risk of flooding and erosion. However the SMP continues a 'Hold the Line' policy at Lynmouth, implying that the defences will be maintained and eventually replaced with larger structures to continue to provide protection to Lynmouth (see para. 5.37). The Authority has not designated a CCMA at Lynmouth due to this long term policy approach.	NO CHANGE REQUIRED
0120 0120/10	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated	CC-S3 - PORLOCK WEIR COASTAL CHANGE MANAGEMENT AREA	Suggest further clarification is required regarding the positive management of change in relation to the historic environment.	Noted – supporting text will be amended to reflect the positive management of change in relation to the historic environment.	Proposed change: include reference to the management of change to the historic environment to paragraph 5.43, in the context of policies CC-S3 and CC-S4.
0120 0120/11	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated	CC-S4 - REPLACEMENT DEVELOPMENT FROM COASTAL CHANGE MANAGEMENT AREAS	Suggest further clarification is required regarding the positive management of change in relation to the historic environment.		
0053 0053/02	Mr David Alford West Somerset Council				CC-D2 - Water Conservation	WSC seek modifications to the supporting text (para. 5.50) to ensure sufficient water is available for development on a private water supply - further guidance is considered to be necessary in terms of pressure and flow.	WSC concerns regarding private domestic water supplies are noted. Propose to amend the supporting text to reflect the representation, and include reference to local building control and environmental health teams regarding appropriate pressure and flow to support sufficient water availability.	Proposed change: amend paragraph 5.50 to state "sufficient water is available..." Also reference advice from local building control and environmental health teams (district councils) regarding appropriate pressure and flow.
0066 0066/04	Mr Richard Briden	Not Stated	No	No	Paras. 5.63-5.65	Concern that there is no prioritisation of community renewable energy schemes. Policy should support schemes that would result in significant community benefit.	Many communities have already benefitted from renewable energy developments on or within public buildings. Paragraph 5.652 states that small-scale renewable energy developments are supported in principle where they contribute to meeting domestic, community or business energy needs and schemes that provide community benefits will be particularly supported (where impacts are acceptable). This is also reflected in paragraphs 5.90-93 and policy CC-S5 Low Carbon and Renewable Energy Development. It is not considered necessary to prioritise community schemes above those of individual dwellings and businesses.	NO CHANGE REQUIRED

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0058 0058/07	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	CC-S5 - LOW CARBON AND RENEWABLE ENERGY DEVELOPMENT	BE consider that the test for large scale renewable energy should be deleted and the word 'small scale' removed from the policy.	For the avoidance of doubt is it considered necessary to include clause 2 and the words 'small-scale' in clause 1 (defined in paragraph 5.62) so the policy intention is clear to ensure such development will not result in significant environmental harm.	NO CHANGE REQUIRED
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	Text in the Plan does not differentiate between hydro schemes on main rivers and those on streams; it is suggested that reference is made to detailed website guidance agreed with the ENPA.	Noted – a reference is proposed to be made in paragraph 5.73: "A number of rivers are designated or are important for migratory fish such as salmon and sea trout, and any barriers to movement such as new weirs are unlikely to be approved by the Environment Agency." Para 5.60 states 'although not all water courses may be suitable and other interests will need to be taken into account'	Proposed change: insert text regarding hydropower into paragraph 5.73.
0043 0043/22	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	CC-D3 - Small-Scale Wind Turbines	Support subject to referring to a maximum height for wind turbines in the supporting text - the test in the policy is unnecessary if all other criteria are satisfied.	This policy has been extensively debated by Officers and Members and it is felt that criterion 1.a) is essential to the policy reflecting the maximum height of wind turbines permitted to date which have reference to existing vertical features.	NO CHANGE REQUIRED
0120 0120/12	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated	CC-D4 - Freestanding Solar Arrays	Suggest that criterion e) might refer to "not harming" rather than "not detracting from".	Noted.	Proposed change: replace 'detract from the' with 'harm the significance and' within clause 1.f).
0033 0033/03	Mr Tim Hambly Environment Agency	Yes	Yes		Para. 5.118	Highlighting a typing error in paragraph 5.118.	Noted.	Proposed change: amend 'safeguarded' to 'safeguard'.
0046 0046/03	Mr Paul Hickson Somerset County Council	Not Stated	Not Stated	No	Para. 5.109 CC-S6 - WASTE MANAGEMENT	SCC suggest the paragraph is rephrased more appropriately to refer to the respective Waste Plans of adjoining waste authorities, and to clarify the scale of inappropriate commercial composting and recycling plants as 'large scale waste facilities'.	Noted. Paragraph 5.109 will be amended as follows: (insert) The Somerset Waste Core Strategy and Devon Waste Plan articulate this relationship with Exmoor National Park, acknowledging Both County Councils agree with the National Park Authority and insert the words 'large scale' before the terms "facilities for the disposal of domestic..." and "specialised processing sites". Further wording will be inserted to clarify acceptable small scale recycling and composting facilities.	Proposed changes: amend para. 5.109 as suggested by the representation. Provide further clarification regarding large scale facilities and insert text at the end of the paragraph in relation to appropriate small scale facilities within the National Park.

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0046 0046/04	Mr Paul Hickson Somerset County Council	Not Stated	Not Stated	No	Para. 5.112 CC-S6 - WASTE MANAGEMENT	SCC suggest that clarifications are made to the text to state a preference for off-site recycling or recovery above disposal. The final two sentences should be moved to 4.159 (policy CE-S6) and reference to 'access' and 'storage' to be made.	Noted.	Proposed changes: move final two sentences of para 5.112 to para. 4.159 and insert the following text: In these circumstances, off-site recovery or reuse will be sought in preference to off-site disposal.
0067 0067/08	The Crown Estate	Yes	Yes	No	CC-S6 - WASTE MANAGEMENT	TCE are concerned that the restriction of allowable sources of waste for anaerobic digestion from local sources is unworkable and would restrict the viability of such schemes. The policy is not flexible in terms of changing conditions in the availability of waste or energy markets may have on viability. It is considered that this test is too restrictive, difficult to manage and enforce in practice.	The policy was amended following the Draft Local Plan consultation (November – December 2013) to provide flexibility regarding the area where feedstock for anaerobic digesters can be sourced - this has been extended to the whole of the National Park and parishes adjoining the National Park. Having no restrictions in place may result in adverse traffic safety and environmental issues, whereas utilising feedstock from sources within or adjoining the National Park improves sustainability.	NO CHANGE REQUIRED
0047 0047/01	Mr Mike Highfield Somerset County Council	Not Stated	Not Stated	Not Stated	Para. 5.151	SCC state that the Plan makes no reference to the Noise Policy Statement of England 2010 which is recommended for inclusion, and which may benefit any intention to ensure development noise impacts are kept below the lowest observed adverse effect level (LOAE) in regions of valued tranquillity. Modifications suggested to para. 5.151 to clarify the terminology relating to tranquillity.	Noted - include reference to the Noise Policy Statement of England 2010 and provide clarification that noise should not exceed the lowest observed adverse effect level above which adverse effects on health and quality of life can be detected.	Proposed change: insert reference to the NPSE and have regard to the LOAE in paragraph 5.151.
0007 0007/01	Mr David Cook				6 Achieving a Thriving Community	Concern raised in relation to the absence of opportunities for long term residents to retire and downsize through building a smaller dwelling within the curtilage of their existing dwelling.	The plan provides flexibility for the subdivision of existing homes to enable residents to downsize. It is considered that those who already own their own home have resources available to meet their own needs on the open market. Furthermore proposed changes ² (following updated government guidance) to policy HC-D3 enables the provision of accessible and adaptable housing for older and more vulnerable people who have a local connection to Exmoor as part of the mix of housing provided to enable the delivery of affordable housing schemes.	NO CHANGE REQUIRED

² See the Schedule of Proposed Changes – Exmoor National Park Local Plan 2011-2031 for Submission (April 2016)

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0051 0051/05	South West HARP Planning Consortium	Not Stated	Not Stated	No	6 Achieving a Thriving Community	An error relating to the reference to a Viability Study published in 2012 in the Housing Topic Paper should have correctly referenced the 2011 Housing Viability Assessment which is considered to be out of date and contrary to the NPPF (para.158). Up to date assessments of viability in relation to the policy approach in the Plan are important considerations. A key issue, of minor concern, arising from the 2011 Viability Assessment was that 100% affordable schemes would not be viable unless sites are purchased for less than £100k/ha or an element of market housing is provided as an enabler to affordable housing.	Error in the referencing the date of the Viability Study is noted. The viability assessment relating to housing provision in the National Park has been updated to underpin the Local Plan.	See supporting evidence: Exmoor National Park Viability Assessment 2016
0056 0056/03	Jacky Walters Parracombe Parish Council	Not Stated	Not Stated	Not Stated	6 Achieving a Thriving Community	Concern remains regarding the identification of housing need and the provision/delivery of local needs affordable housing.	The Plan provides greater flexibility to enable the provision of affordable housing to address the needs of local communities. The Authority works closely with local housing authorities to ensure that housing needs data is available, particularly where local communities request a survey.	NO CHANGE REQUIRED
0060 0060/05	Mrs Molly Groves Exmoor Uprising	Not Stated	Not Stated	Not Stated	6 Achieving a Thriving Community	Exmoor Uprising seek to include a further policy within the Local Plan which would provide greater flexibility for legitimate local needs or local low paid working people with regard to new dwellings where they are located beside or near permanent buildings. Preventing such homes from becoming second homes.	Policies within the Plan enable the provision of homes in the open countryside to meet the needs of rural working communities through the conversion of existing buildings on farmsteads and in hamlets to local affordable homes, rural workers dwellings or succession farm dwellings - additionally the conversion of existing buildings on farmsteads to extended family dwellings. Options are also available for new build homes for rural workers, succession farm dwellings on farmsteads, and local affordable homes in small rural communities that have at least one service (a shop, pub or community meeting place).	NO CHANGE REQUIRED
0063 0063/01	Sue Green Home Builders Federation Ltd	Not Stated	Not Stated	No	6 Achieving a Thriving Economy	Housing Needs and Supply: 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 unresolved matter of unmet housing needs should be agreed before the submission of the Exmoor Local Plan to the Secretary of State for examination.	The derivation of the OAHN is set out an updated Housing Topic Paper following updates to the SHMA which consider the implications of the 2012-based household projections. A Joint Housing Topic Paper with North Devon, Torridge and West Somerset Councils has been produced to demonstrate that the housing needs across the Housing Market Area will be met.	Update the Exmoor National Park Local Plan Housing Topic Paper regarding the update to the Northern Peninsula Housing Market Area SHMA: the Implications of 2012-based Household Projections (Housing Vision, December 2015). Update para. 6.28 regarding OAHN.

ISSUES RAISED BY RESPONDENTS - EXMOOR NATIONAL PARK AUTHORITY RESPONSE AND ACTIONS

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0051 0051/04	South West HARP Planning Consortium	Not Stated	Not Stated	No	Paras. 6.26-6.31	It is noted that Councils across the North Devon Peninsula Housing Market Area have failed to demonstrate how the Objectively Assessed Housing Need (OAHN) has been derived. 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. 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 to be in accordance with planning practice guidance.	Further evidence has been commissioned in relation to the 2012 household projections released in February 2015. The derivation of the OAHN is set out in an updated Housing Topic Paper. A Joint Housing Topic Paper with North Devon, Torridge and West Somerset councils has been produced to demonstrate that the housing needs across the Housing Market Area will be met.	Northern Peninsula Housing Market Area SHMA: the Implications of 2012-based Household Projections was published in December 2015. This evidence will be used to inform the OAHN for the National Park. Update paras. 6.26 and 6.28 regarding OAHN.
0058 0058/08	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	Para. 6.47	BE considers that the 90sqm floorspace limit is unnecessarily restrictive and will prevent local affordable housing from being delivered or opportunities for live-work provision. Request that text referring to the floorspace standard is deleted.	No evidence is provided to substantiate this assertion. Housing with a 90sqm net internal floorspace has been delivered since 2005 within the National Park. Additional outbuildings are considered to be suitable to provide storage / space for business needs. The Authority has considered the implications of the Technical Housing Standards - nationally described space standards and proposes to change the 90sqm net internal floorspace requirement to 93sqm gross internal area to be consistent with the space standards for a 3 bed, 5 person, two-storey home.	Proposed change: amend 90sqm net internal floorspace to be consistent with nationally described space standards – as 93sqm gross internal area. The changes to adopt new national technical standards have been subject to an updated Viability Assessment.
0043 0043/27	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	HC-S1 - HOUSING	Object to the meaning to criteria 1.b) - clarification required in terms of policy references.	Noted - clarification required in relation to clause 1.b) - amend the clause by deleting cross references to "HC-D7 or HC-D8".	Proposed change: delete references to "HC-D7 or HC-D8" in clause 1.b).
0058 0058/09	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	HC-S1 - HOUSING	BE considers that the policy should allow for housing land to be allocated to enable settlements to remain viable and where there is a need for housing to meet employment demands.	The focus of the Local Plan housing policies is on the delivery of local need affordable homes through a rural exception site approach to help ensure that younger people can continue to live and work on Exmoor. Evidence shows that the majority of people housed in recent affordable housing schemes are aged under 40. Local connection criteria also include those who need to live close to their place of work.	NO CHANGE REQUIRED
0063 0063/02	Sue Green Home Builders Federation Ltd	Not Stated	Not Stated	No	HC-S1 - HOUSING	HC-S1 text box should reference the ministerial statement dated 25/3/15.	Noted - this information is now invalid following the judgment in R (on the application of West Berkshire District Council and Reading Borough Council) v Secretary of State for Communities and Local Government [2015]	Proposed change: delete the text box after HC-S1.

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0067 0067/09	The Crown Estate	Yes	Yes	No	HC-S1 - HOUSING	TCE is concerned about the deliverability of the policy. It is noted that the lack of affordable housing weakens community networks and makes access to services more difficult. It is accepted that the provision of affordable homes should be a priority but the policy does not take account of the issues surrounding the financial viability of such schemes. TCE would encourage the Authority to allow a proportion of non-affordable housing to be provided to achieve a viable development scheme - to also be applied to the development of self build housing.	The policy provides flexibility to enable the delivery of local affordable homes through the provision of Principal Residence market housing (clause 3). Further detail is set out in policy HC-D2 New Build Dwellings in Settlements.	NO CHANGE REQUIRED
0066 0066/06	Mr Richard Briden	Not Stated	No	No	Text Box page 133	Further clarification required in relation to the financial contribution towards the provision of local affordable housing for schemes with 6 - 10 units and how this is calculated. Question whether principal residence can be attached to permissions for market dwellings through the application of S106 thresholds.	This information is now invalid following the judgment in R (on the application of West Berkshire District Council and Reading Borough Council) v Secretary of State for Communities and Local Government [2015]	Proposed change: delete the text box after HC-S1.
0043 0043/28	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	HC-S2 - A BALANCED LOCAL HOUSING STOCK	Policy HC-S2 is supported subject to further clarification on whether criteria 1.a) to c) are inclusive or exclusive.	Noted. Other proposed changes to the policy (see Schedule of Proposed Changes) result in criteria 1.a) to c) being realigned into separate clauses	Format policy so clauses are numbered individually.
0058 0058/10	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	HC-S2 - A BALANCED LOCAL HOUSING STOCK	Modification sought to delete criterion 1.c) in relation to 90sqm limitation for private owner occupied local need dwellings, specialist housing, extended family dwellings and succession farm dwellings.	No evidence is provided to substantiate this assertion. Local affordable housing with a 90sqm net internal floorspace has been delivered since 2005 within the National Park. The Authority has considered the implications of the Technical Housing Standards - nationally described space standards and proposes to change the 90sqm net internal floorspace requirement to 93sqm gross internal area to be consistent with the space standards for a 3 bed, 5 person, two-storey home.	Proposed change: amend 90sqm net internal floorspace to be consistent with nationally described space standards – as 93sqm gross internal area. The changes to adopt new national technical standards have been subject to an updated Viability Assessment.

ISSUES RAISED BY RESPONDENTS - EXMOOR NATIONAL PARK AUTHORITY RESPONSE AND ACTIONS

Respondent number/ Representation number	Name Company/ organisation	Legal Compliance	Complies with Duty	Plan sound?	Plan section, paragraph or policy	Summary of representation	Authority Response	Proposed Actions
0061 0061/01	Mr Mervyn Orchard-Lisle Monksilver Parish Council	Not Stated	Not Stated	Not Stated	HC-S2 - A BALANCED LOCAL HOUSING STOCK	Monksilver PC are concerned at the 90sqm threshold for affordable housing due to this not adequately meeting the space needs for larger families needing affordable housing - flexibility is required. Further concern relates to all housing being limited to affordable housing which is considered to disregard and disadvantage the proportion of the population who can afford to buy and support the local economy, and result in putting a premium on larger houses.	No evidence is provided to substantiate this assertion. Local affordable housing with a 90sqm net internal floorspace has been delivered since 2005 within the National Park. Housing controlled by Registered Providers can be larger than 90sqm to provide for larger families in housing need. The Authority has considered the implications of the Technical Housing Standards - nationally described space standards and proposes to change the 90sqm net internal floorspace requirement to 93sqm gross internal area to be consistent with the space standards for a 3 bed, 5 person, two-storey home.	Proposed change: amend 90sqm net internal floorspace to be consistent with nationally described space standards – as 93sqm gross internal area. The changes to adopt new national technical standards have been subject to an updated Viability Assessment.
0063 0063/04	Sue Green Home Builders Federation Ltd	Not Stated	Not Stated	No	HC-S2 - A BALANCED LOCAL HOUSING STOCK	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.	The Authority has considered the implications of the Technical Housing Standards - nationally described space standards and proposes to change the 90sqm net internal floorspace requirement to 93sqm gross internal area to be consistent with the space standards for a 3 bed, 5 person, two-storey home in HC-S2 A Balanced Housing Stock. ENPA has also considered the introduction of optional new technical standards for the access and use of buildings. The changes to adopt new national technical standards have been subject to an updated Viability Assessment.	Proposed changes: amend 90sqm net internal floorspace to be consistent with nationally described space standards – as 93sqm gross internal area. Amend policy HC-S2 to incorporate the requirements for accessible and adaptable homes (optional building regulations requirements).
0043 0043/29	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	Paras. 6.83 -6.84 HC-S3 - LOCAL OCCUPANCY CRITERIA	Support for policy HC-S3 subject for further clarification in the supporting text or future SPD relating to marketing, housing need assessments and future needs.	Noted – it is intended that a future Housing SPD will set out the detailed measures required for marketing/letting local affordable homes.	NO CHANGE REQUIRED
0058 0058/11	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	HC-S3 - LOCAL OCCUPANCY CRITERIA	BE consider that the local connection criteria are unnecessarily restrictive and the policy should allow for those moving to the area to take up employment or set up a business.	The local connection criteria have been supported throughout the preparation of the Local Plan. Clause 1.e) includes those in affordable housing need who need to live close to their place of work or meet the requirements of an Exmoor Worker (further clarification will be included in a forthcoming Housing SPD).	NO CHANGE REQUIRED
0066 0066/03	Mr Richard Briden	No	Not Stated	No	Para. 6.87	Concern that finance will not be obtainable for homes with a principal residence condition - clarification is sought in relation to whether market rate mortgages are easily available.	Noted - Principal Residence homes can be owned by anyone, the only restriction is that they must be occupied as someone's principal (main) residence - this only prevents the dwelling being used as a holiday or second home. It is considered that this should not unduly prevent mortgages being secured on such dwellings.	NO CHANGE REQUIRED

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Respondent number/ Representation number	Name Company/ organisation	Legal Compliance	Complies with Duty	Plan sound?	Plan section, paragraph or policy	Summary of representation	Authority Response	Proposed Actions
0043 0043/30	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	HC-S4 - PRINCIPAL RESIDENCE HOUSING	Policy HC-S4 is supported subject to suitable cross referencing and clarification in the text relating to the minimum market housing required to make affordable housing schemes viable.	Noted. It is considered that this is adequately referenced in relation to HC-D2 New Dwellings in Settlements.	NO CHANGE REQUIRED
0058 0058/12	Mr Mark Sanders Business Exmoor				Para. 6.87 HC-S4 - PRINCIPAL RESIDENCE HOUSING	Modification sought to delete policy HC-S4 which is considered to conflict with the NPPF through the use of principal residence conditions.	ENPA do not consider that policy HC-S4 conflicts with the NPPF. The particular circumstances within the National Park; that 19.2 % of all dwellings have 'no usual residents' (approximately 16% second/holiday homes), is considered to be reasonable justification for introducing this policy approach. Such a condition will only be applied to the creation of new market dwellings within the National Park.	NO CHANGE REQUIRED
0058 0058/13	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	HC-D1 - Conversions to Dwellings in Settlements	Modification sought to delete criteria from 1.c) to the end of the policy as it is considered to conflict with the NPPF in relation to the change of use of buildings to dwellings.	It is not considered that the policy conflicts with the NPPF. The policy has been prepared in accordance with the NPPF, and in relation to the specific needs identified within the National Park. The key aim is to maximise the use of existing buildings in addressing the housing needs of Exmoor's communities.	NO CHANGE REQUIRED
0063 0063/05	Sue Green Home Builders Federation Ltd	Not Stated	Not Stated	No	HC-D1 - Conversions to Dwellings in Settlements	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.	The Authority has considered the implications of the Technical Housing Standards - nationally described space standards and proposes to change the 90sqm net internal floorspace requirement to 93sqm gross internal area to be consistent with the space standards for a 3 bed, 5 person, two-storey home in HC-S2 A Balanced Housing Stock. The changes to adopt new national technical standards have been subject to an updated Viability Assessment.	Proposed change: amend 90sqm net internal floorspace to be consistent with nationally described space standards – as 93sqm gross internal area (within policy HC- S2 and supporting text to the relevant policies).

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0066 0066/07	Mr Richard Briden	Not Stated	No	No	HC-D1 - Conversions to Dwellings in Settlements	The approach to the change of use of guesthouses/hotels and the subdivision of existing dwellings is questioned, as change of use requires the provision of affordable housing and units created through subdivision would be principal residence housing. Modifications are sought to ensure that subdivision of any property (including guesthouses) is the same and any distinction should apply to full-service commercial, staffed establishments or those above 1000sqm.	The difference in policy approach is in relation to the existing use of the building. If a building's use is classed as a dwelling then any intention to subdivide into smaller (more affordable) dwelling units is considered to be consistent with the aims of the Plan. It would be unviable if they were also required to be subject to a local occupancy tie. Whereas guesthouses are a different use class (C1) and are considered to be business premises. Owners have generally bought the premises as a hotel/guesthouse to run as a business. The intention is therefore to retain/safeguard the business as visitor accommodation unless it can be demonstrated that it is no longer viable. If it is demonstrated that the business use is no longer viable and housing is sought, it is not considered to be unreasonable to ensure that homes to address local affordable needs are provided, subject to viability. It is recognised in the Plan (Policy RT-D3 Safeguarding Serviced Accommodation) that some smaller guesthouses are likely to have been single dwellings in the past and therefore the policy does enable such guesthouses to revert to a dwelling if the tests are met.	NO CHANGE REQUIRED
0043 0043/32	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	HC-D2 - New Build Dwellings in Settlements	Support subject to clarification over the term 'named settlements' in order to support sustainable patterns of development - including reference in the Glossary.	Noted – it is proposed that the term 'named settlements' will be clarified and included in the Glossary. The supporting text to GP3 Spatial Strategy does state that Local Service Centres, Villages and Porlock Weir will be collectively termed as 'named settlements'.	Proposed change: clarify the term 'named settlements' in the Glossary.
0058 0058/14	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	HC-D2 - New Build Dwellings in Settlements	Amendments sought to include employment needs in criterion 1.b) and deletion of the 90sqm floorspace limitation.	No evidence is provided to substantiate this assertion. Local affordable housing with a 90sqm net internal floorspace has been delivered since 2005 within the National Park. Local connection criteria within policy HC-S3 includes those who need to live close to their place of work. The Authority has considered the implications of the Technical Housing Standards - nationally described space standards and proposes to change the 90sqm net internal floorspace requirement to 93sqm gross internal area to be consistent with the space standards for a 3 bed, 5 person, two storey home in policy HC-S2 A Balanced Housing Stock. The changes to adopt new national technical standards have been subject to an updated Viability Assessment.	Proposed change: amend 90sqm net internal floorspace to be consistent with nationally described space standards – as 93sqm gross internal area within policy HC-S2. Also amend the supporting text to the relevant policies.

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0061 0061/02	Mr Mervyn Orchard-Lisle Monksilver Parish Council	Not Stated	Not Stated	Not Stated	HC-D2 - New Build Dwellings in Settlements	Monksilver PC are concerned at the 90sqm threshold for affordable housing due to this not adequately meeting the space needs for larger families needing affordable housing - flexibility is required. Further concern relates to all housing being limited to affordable housing which is considered to disregard and disadvantage the proportion of the population who can afford to buy and support the local economy, and result in putting a premium on larger houses.	No evidence is provided to substantiate this assertion. Local affordable housing with a 90sqm net internal floorspace has been delivered since 2005 within the National Park. Housing controlled by Registered Providers can be larger than 90sqm to provide for larger families in housing need. The Authority has considered the implications of the Technical Housing Standards - nationally described space standards and proposes to change the 90sqm net internal floorspace requirement to 93sqm gross internal area to be consistent with the space standards for a 3 bed, 5 person, two-storey home in HC-S2 A Balanced Housing Stock. The changes to adopt new national technical standards have been subject to an updated Viability Assessment. The policy also provides for the delivery of Principal Residence market housing where it would enable the delivery of affordable housing to meet local needs.	Proposed change: amend 90sqm net internal floorspace to be consistent with nationally described space standards – as 93sqm gross internal area within policy HC- S2. Also amend the supporting text to the relevant policies.
0063 0063/06	Sue Green Home Builders Federation Ltd	Not Stated	Not Stated	No	HC-D2 - New Build Dwellings in Settlements	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.	The Authority has considered the implications of the Technical Housing Standards - nationally described space standards and proposes to change the 90sqm net internal floorspace requirement to 93sqm gross internal area to be consistent with the space standards for a 3 bed, 5 person, two-storey home in HC-S2 A Balanced Housing Stock. Also consider the optional new technical standards for water efficiency and the access and use of buildings. The changes to adopt new national technical standards have been subject to an updated Viability Assessment.	Proposed change: amend 90sqm net internal floorspace to be consistent with nationally described space standards – as 93sqm gross internal area within policy HC- S2. Also amend the supporting text to the relevant policies.
0051 0051/06	South West HARP Planning Consortium	Not Stated	Not Stated	Not Stated	HC-D3 - Specialist Housing for Exmoor’s Communities	Policy HC-D3 is supported but criterion 1.a) is considered to be unnecessarily restrictive given the large proportion of elderly people within the National Park.	Noted.	Proposed change: delete clause 1.a)

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0063 0063/07	Sue Green Home Builders Federation Ltd	Not Stated	Not Stated	No	HC-D3 - Specialist Housing for Exmoor's Communities	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.	The Authority has considered the implications of the Technical Housing Standards - nationally described space standards and proposes to change the 90sqm net internal floorspace requirement to 93sqm gross internal area to be consistent with the space standards for a 3 bed, 5 person, two-storey home in HC-S2 A Balanced Housing Stock. ENPA have considered the adoption of optional new technical standards for the access and use of buildings. The changes to adopt new national technical standards have been subject to an updated Viability Assessment.	Proposed change: amend 90sqm net internal floorspace to be consistent with nationally described space standards – as 93sqm gross internal area within policy HC-S2. Amend policy HC-D3 to incorporate the requirements for accessible and adaptable homes (optional building regulations requirements).
0058 0058/15	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	HC-D4 - Extended Family Dwellings Criteria	BE suggest the policy is deleted as it is not considered to be consistent with the NPPF.	ENPA consider that the policy does not conflict with the NPPF. The policy has been prepared in accordance with the NPPF, and in relation to the specific needs identified within the National Park. The key aim is to maximise the use of existing buildings in addressing the housing needs of Exmoor's communities, including the needs of local families.	NO CHANGE REQUIRED
0066 0066/05	Mr Richard Briden	Not Stated	No	No	Paras. 6.132-133	Concern that the policy encourages homes that would have little or no resale value and therefore seek to modify the policy so self build homes are exempt from affordable and principal residence housing conditions.	The rural exception site approach to new build local affordable housing across the National Park is intended to keep land values low so that homes can remain affordable to local people in housing need in perpetuity. The value will also be reduced to a certain extent due to the restriction to gross internal floor area and being subject to a local occupancy tie. Self builds are treated as a 'stand-alone' product that will be taken up when a self/custom builder finds them to be economically realistic.	NO CHANGE REQUIRED

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0060 0060/01	Mrs Molly Groves Exmoor Uprising	No	No	No	HC-D5 - Custom/Self Build Local Need Housing in Rural Communities	Exmoor Uprising are concerned that local people, and their important rural skills, that help conserve and enhance Exmoor, will be lost unless affordable homes can be provided at low cost in locations outside the named settlements which help to sustain family and employment networks. Exmoor Uprising consider that homes constructed of timber are more affordable and examples of those permitted are given. They feel aggrieved that they have not been consulted more extensively on this matter. In relation to policy HC-D5, Exmoor Uprising are concerned that plots for self build homes will not be affordable to local people, and other small communities (other than rural communities with one service) should be considered as locations for self build as they give and receive services too. Exmoor Uprising have included appendices to their response which details potential solutions to providing low cost affordable housing for local people which includes: wooden homes of simple, varied designs that would blend in with remoter hamlet or single home areas; located near to other buildings; include a large wooden enclosed porch; suitable outbuildings to support rural businesses; located on land that is leased perhaps through a ground rent to people with a strong local connection; houses easy to dismantle and move to other sites in two halves.	Policies within the Plan enable the provision of homes in the open countryside to meet the needs of rural working communities through the conversion of existing buildings on farmsteads and in hamlets to local affordable homes, rural workers dwellings or succession farm dwellings - additionally the conversion of existing buildings on farmsteads to extended family dwellings. Options are also available for new build homes for rural workers, succession farm dwellings on farmsteads, and local affordable homes in small rural communities that have at least one service (a shop, pub or community meeting place). Policy CE-S6 Design and Sustainable Construction Principles recognises that timber is a sustainable material which can be sourced locally and therefore is suitable local building material. The rural exception site approach to new build local affordable housing across the National Park is intended to keep land values low so that homes can remain affordable to local people in housing need in perpetuity. Greater flexibility has been afforded to new build homes in the open countryside to help address the needs of farming communities including self-build homes in rural communities and succession farm dwellings. Opportunities have also been highlighted regarding the conversion of existing buildings. It is considered that further relaxation would impact on the conservation and enhancement of the National Park.	NO CHANGE REQUIRED
0063 0063/08	Sue Green Home Builders Federation Ltd	Not Stated	Not Stated	No	HC-D5 - Custom/Self Build Local Need Housing in Rural Communities	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.	Clarification required in relation to the derivation of 90sqm. The Authority has considered the implications of the Technical Housing Standards - nationally described space standards and proposes to change the 90sqm net internal floorspace requirement to 93sqm gross internal area to be consistent with the space standards for a 3 bed, 5 person, two storey home in HC-S2 A Balanced Housing Stock. The changes to adopt new national technical standards have been subject to an updated Viability Assessment.	Proposed changes: amend 90sqm net internal floorspace to be consistent with nationally described space standards – as 93sqm gross internal area within policy HC-S2. Also amend the supporting text to the relevant policies.

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0067 0067/13	The Crown Estate	Yes	Yes	No	HC-D5 - Custom/Self Build Local Need Housing in Rural Communities	TCE recognise the need for a local occupancy tie but considers that the condition that they must be affordable units is too restrictive would decrease the value of the asset; therefore delivery as a means of meeting an objectively assessed housing need may be compromised. TCE seek to remove this requirement and instead the policy should seek to allow for the delivery of affordable housing at another site. It is also considered that self-builders would be restricted in accessing credit to complete the build and may also be restricted in terms of the design they intend to pursue.	The rural exception site approach to new build local affordable housing across the National Park is intended to keep land values low so that homes can remain affordable to local people in housing need in perpetuity. The value will also be reduced to a certain extent due to the restriction to gross internal floor area and being subject to a local occupancy tie. Self builds are treated as a 'stand-alone' product that will be taken up when a self/custom builder finds them to be economically realistic.	NO CHANGE REQUIRED
0063 0063/09	Sue Green Home Builders Federation Ltd	Not Stated	Not Stated	No	HC-D6 - The Change of Use of Serviced Accommodation to Housing	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.	The Authority has considered the implications of the Technical Housing Standards - nationally described space standards and proposes to change the 90sqm net internal floorspace requirement to 93sqm gross internal area to be consistent with the space standards for a 3 bed, 5 person, two-storey home in HC-S2 A Balanced Housing Stock.	NO CHANGE REQUIRED (Policy proposed to be deleted as a consequence of the removal of S106 thresholds for affordable housing from Planning Practice Guidance - see Schedule of Proposed Changes)
0068 0068/02	Mr James Shorten Geo	Not Stated	Not Stated	No	Para. 6.147	It is considered that the purpose of 6.147 is not clear as it introduces the concept of 'low impact' or 'one planet development' (OPD) which appears incongruous in the section dealing with rural workers. It is considered that open countryside one planet development (OCOPD) utilises land and subsistence based livelihood to contribute to sustainable development. Examples of specific policies in plans for Pembrokeshire Coast and Dartmoor National Parks are cited as best practice. Such developments are considered to make strong contributions to rural sustainability. Modifications sought include a clear distinction in the Plan with regard to OCOPD with a separate policy required.	Noted - it is not considered that a new policy at this stage of the plan is necessary to address this response. The need for a specific policy to address the needs of OCOPD has not been justified through the preparation of the Local Plan - nor has any existing need been identified. The priority for the plan is to address the housing needs of Exmoor's local communities. If such needs arise they will be required to meet the policy approach for housing in the Local Plan.	NO CHANGE REQUIRED

ISSUES RAISED BY RESPONDENTS - EXMOOR NATIONAL PARK AUTHORITY RESPONSE AND ACTIONS

Respondent number/ Representation number	Name Company/ organisation	Legal Compliance	Complies with Duty	Plan sound?	Plan section, paragraph or policy	Summary of representation	Authority Response	Proposed Actions
0058 0058/16	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	HC-D7 - Conversions to Dwellings in the Open Countryside	BE suggest that the policy is deleted or significantly amended to support the change of use of buildings to [open market] dwellings. BE suggests that the definition of rural exception sites does not apply to existing buildings in the open countryside.	The definition of a rural exception site does not exclude existing buildings in the open countryside. It is considered that such an important resource is utilised to address the housing needs of Exmoor's communities and farming communities rather than meeting external demands for housing (including for second/holiday homes). This is supported by the English National Parks and The Broads Circular which states that "National Parks are not suitable locations for unrestricted housing". The NPPF sets out policy relevant to the work of all planning authorities. Its content must be balanced against the content of other relevant policy and Acts of Parliament. In the National Park's case the purposes of National Parks and duties of relevant bodies set out in the Environment Act 1995 (sections 61 and 62) carry great weight and in themselves provide the context for interpreting policy. Because of the overriding constraints within National Parks recognised in the NPPF, the limited opportunities for housing development should focus on the delivery of housing to address local and affordable housing needs. Policy HC-D7 Conversions to Dwellings in the Open Countryside ensures that existing buildings in the most sustainable locations are an important resource which can be utilised to provide for the housing needs of Exmoor's communities through the provision of local affordable housing, extended family dwellings, rural worker dwellings or succession farm dwellings. It is not considered appropriate to provide for open market dwellings in the open countryside when the priority is addressing the housing needs of Exmoor's communities including those within rural communities (having at least a shop, pub or community meeting place) and on farmsteads.	NO CHANGE REQUIRED

ISSUES RAISED BY RESPONDENTS - EXMOOR NATIONAL PARK AUTHORITY RESPONSE AND ACTIONS

Respondent number/ Representation number	Name Company/ organisation	Legal Compliance	Complies with Duty	Plan sound?	Plan section, paragraph or policy	Summary of representation	Authority Response	Proposed Actions
0067 0067/14	The Crown Estate	Yes	Yes	No	HC-D7 - Conversions to Dwellings in the Open Countryside	TCE consider that the costs of conversion would mean the conversion to an affordable home would be unviable. Allowing a proportion to non-affordable [market] dwellings could fund the provision of affordable dwellings elsewhere on site or through contributions towards affordable housing in other areas of the National Park. Conversion to market housing is considered to have economic benefits with improving access to broadband and growth in home-working. TCE considers that the policy should include a criterion that would allow for opportunities on a live-work basis that would help support the rural economy.	It is considered that existing buildings are an important resource, particularly in the open countryside, that should be utilised to address the housing needs of Exmoor's communities and farming communities rather than meeting external demands for housing (including for second/holiday homes). Live-work opportunities can apply through the conversion of existing building on a farmstead or in a hamlet through the application of policies HC-D7 and SE-D2 Home Based Businesses. The NPPF content must be balanced against the content of other relevant policy and Acts of Parliament. The purposes of National Parks and duties of relevant bodies set out in the Environment Act 1995 (sections 61 and 62) carry great weight and in themselves provide the context for interpreting policy. Because of the overriding constraints within National Parks recognised in the NPPF, the limited opportunities for housing development should focus on the delivery of housing to address local and affordable housing needs. This is recognised in the National Parks Circular. It is clear that the expectation in national policy specifically for National Parks is that new housing should be focused on affordable housing needs. Policy HC-D7 Conversions to Dwellings in the Open Countryside ensures that existing buildings in the most sustainable locations are an important resource which can be utilised to provide for the housing needs of Exmoor's communities through the provision of local affordable housing, extended family dwellings, rural worker dwellings or succession farm dwellings. It is not considered appropriate to provide for open market dwellings in the open countryside when the priority is addressing the housing needs of Exmoor's communities including those within rural communities (having at least a shop, pub or community meeting place)and on farmsteads.	NO CHANGE REQUIRED

ISSUES RAISED BY RESPONDENTS - EXMOOR NATIONAL PARK AUTHORITY RESPONSE AND ACTIONS

Respondent number/ Representation number	Name Company/ organisation	Legal Compliance	Complies with Duty	Plan sound?	Plan section, paragraph or policy	Summary of representation	Authority Response	Proposed Actions
0060 0060/02	Mrs Molly Groves Exmoor Uprising	No	No	No	HC-D8 - New Build Dwellings in the Open Countryside	Exmoor Uprising are concerned that local people, and their important rural skills, that help conserve and enhance Exmoor, will be lost unless affordable homes can be provided at low cost in locations outside the named settlements which help to sustain family and employment networks. Exmoor Uprising note the aims of policy HC-D8. Exmoor Uprising have included appendices to their response which details potential solutions to providing low cost affordable housing for local people which includes: wooden homes of simple, varied designs that would blend in with remoter hamlet or single home areas; located near to other buildings; include a large wooden enclosed porch; suitable outbuildings to support rural businesses; located on land that is leased perhaps through a ground rent to people with a strong local connection; houses easy to dismantle and move to other sites in two halves.	Policies within the Plan enable the provision of homes in the open countryside to meet the needs of rural working communities through the conversion of existing buildings on farmsteads and in hamlets to local affordable homes, rural workers dwellings or succession farm dwellings - additionally the conversion of existing buildings on farmsteads to extended family dwellings. Options are also available for new build homes for rural workers, succession farm dwellings on farmsteads, and local affordable homes in small rural communities that have at least one service (a shop, pub or community meeting place). Local Plan policy provides for temporary homes to enable a rural land-based business to be established for up to 3 years, and only in locations where a permanent rural worker dwelling would be considered acceptable. It is not considered appropriate or suitable to enable the provision of temporary homes to address local affordable needs in the open countryside as a long term prospect, or to establish a residential land use on the site for a 'dwelling'.	NO CHANGE REQUIRED
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	Monksilver PC are concerned at the 90sqm threshold for affordable housing due to this not adequately meeting the space needs for larger families needing affordable housing - flexibility is required. Further concern relates to all housing being limited to affordable housing which is considered to disregard and disadvantage the proportion of the population who can afford to buy and support the local economy, and result in putting a premium on larger houses.	The policy relates to new build dwellings for rural workers – not local needs affordable housing. Paragraph 6.139 and policy HC-D9 provide the size for such dwellings with some flexibility for main/principal farm dwellings.	NO CHANGE REQUIRED

ISSUES RAISED BY RESPONDENTS - EXMOOR NATIONAL PARK AUTHORITY RESPONSE AND ACTIONS

Respondent number/ Representation number	Name Company/ organisation	Legal Compliance	Complies with Duty	Plan sound?	Plan section, paragraph or policy	Summary of representation	Authority Response	Proposed Actions
0058 0058/17	Mr Mark Sanders Business Exmoor				HC-D9 - Rural Workers	Modifications sought include the deletion of clause 1.b) regarding financial viability, and the reference to 90sqm floorspace limit.	No evidence is provided to substantiate this assertion. The essential need for a rural worker to live at or near their place of work in the countryside will be assessed by considering the proposal against a number of tests. New permanent dwellings in the open countryside cannot be justified on agricultural grounds, or other rural land-based enterprises, unless the enterprise is economically viable. This requires a financial test. The tests used are set out in Annex 2 of the Local Plan and provide a well-established and understood methodology for assessing whether an essential need exists. The financial test is part of an appropriate framework against which to assess "essential need", taking a realistic approach to the level of profitability and taking account of the nature of the enterprise concerned. The Authority has considered the implications of the Technical Housing Standards - nationally described space standards and proposes to change the 90sqm net internal floorspace requirement to 93sqm gross internal area to be consistent with the space standards for a 3 bed, 5 person, two storey home in HC-S2 A Balanced Housing Stock.	Proposed changes: amend 90sqm net internal floorspace to be consistent with nationally described space standards – as 93sqm gross internal area.
0060 0060/03	Mrs Molly Groves Exmoor Uprising	No	No	No	HC-D9 - Rural Workers	Exmoor Uprising are concerned that local people, and their important rural skills, that help conserve and enhance Exmoor, will be lost unless affordable homes can be provided at low cost in locations outside the named settlements which help to sustain family and employment networks. Exmoor Uprising note the aims of policy HC-D9. Exmoor Uprising have included appendices to their response which details potential solutions to providing low cost affordable housing for local people which includes: wooden homes of simple, varied designs that would blend in with remoter hamlet or single home areas; located near to other buildings; include a large wooden enclosed porch; suitable outbuildings to support rural businesses; located on land that is leased perhaps through a ground rent to people with a strong local connection; houses easy to dismantle and move to other sites in two halves.	Policies within the Plan enable the provision of homes in the open countryside to meet the needs of rural working communities through the conversion of existing buildings on farmsteads and in hamlets to local affordable homes, rural workers dwellings or succession farm dwellings - additionally the conversion of existing buildings on farmsteads to extended family dwellings. Options are also available for new build homes for rural workers, succession farm dwellings on farmsteads, and local affordable homes in small rural communities that have at least one service (a shop, pub or community meeting place). Local Plan policy provides for temporary homes to enable a rural land-based business to be established for up to 3 years, and only in locations where a permanent rural worker dwelling would be considered acceptable. It is not considered appropriate or suitable to enable the provision of temporary homes to address local affordable needs in the open countryside as a long term prospect, or to establish a residential land use on the site for a 'dwelling'.	NO CHANGE REQUIRED

ISSUES RAISED BY RESPONDENTS - EXMOOR NATIONAL PARK AUTHORITY RESPONSE AND ACTIONS

Respondent number/ Representation number	Name Company/ organisation	Legal Compliance	Complies with Duty	Plan sound?	Plan section, paragraph or policy	Summary of representation	Authority Response	Proposed Actions
0063 0063/10	Sue Green Home Builders Federation Ltd	Not Stated	Not Stated	No	HC-D9 - Rural Workers	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.	The Authority has considered the implications of the Technical Housing Standards - nationally described space standards and proposes to change the 90sqm net internal floorspace requirement to 93sqm gross internal area to be consistent with the space standards for a 3 bed, 5 person, two storey home in HC-S2 A Balanced Housing Stock.	Proposed change: amend 90sqm net internal floorspace to be consistent with nationally described space standards – as 93sqm gross internal area.
0058 0058/18	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	HC-D10 - Succession Farming – Second Dwellings on Established Farms	BE supports policy HC-D10 but suggests the 90sqm floorspace threshold is restrictive.	No evidence is provided to substantiate this assertion. The restriction on net internal floorspace ensures that the dwelling remains more affordable to build and meets the needs of new entrants to farming or retiring farmers. The Authority has considered the implications of the Technical Housing Standards - nationally described space standards and proposes to change the 90sqm net internal floorspace requirement to 93sqm gross internal area to be consistent with the space standards for a 3 bed, 5 person, two-storey home in HC-S2 A Balanced Housing Stock.	Proposed change: amend policy HC-S2 regarding ‘90sqm net internal floorspace’ to be consistent with nationally described space standards – as 93sqm gross internal area
0067 0067/15	The Crown Estate	Yes	Yes	No	HC-D10 - Succession Farming – Second Dwellings on Established Farms	TCE are concerned that the succession farm dwellings are likely to prove unviable without some form of cross subsidy from market housing (delivered through the conversion of buildings on the farmstead).	Policy HC-D10 enables a second dwelling to be built on farms to enable the farm to be transferred to a second generation whilst the older generation continue to provide support (equivalent of 0.5 of a full time worker). This flexible approach is considered to help farming businesses continue to thrive. It is not considered that a cross-subsidy approach is necessary as a suitable plot should not have to be purchased. It is for the farming enterprise to be a viable business to enable the provision of such housing. The restriction on net internal floorspace ensures that the dwelling remains more affordable to build and meets the needs of new entrants to farming or retiring farmers.	NO CHANGE REQUIRED
0060 0060/04	Mrs Molly Groves Exmoor Uprising	No	No	No	HC-D12 - Replacement of Rural Workers Occupancy Conditions	Exmoor Uprising note the aims of policy HC-D12.	Comments regarding HC-D12 are noted.	NO CHANGE REQUIRED

ISSUES RAISED BY RESPONDENTS - EXMOOR NATIONAL PARK AUTHORITY RESPONSE AND ACTIONS

Respondent number/ Representation number	Name Company/ organisation	Legal Compliance	Complies with Duty	Plan sound?	Plan section, paragraph or policy	Summary of representation	Authority Response	Proposed Actions
0066 0066/08	Mr Richard Briden	Not Stated	No	No	HC-D14 - Subdivisions of Existing Dwellings	The approach to the change of use of guesthouses/hotels and the subdivision of existing dwellings is questioned, as change of use requires the provision of affordable housing and units created through subdivision would be principal residence housing. Modifications are sought to ensure that subdivision of any property (including guesthouses) is the same and any distinction should apply to full-service commercial, staffed establishments or those above 1000sqm.	The difference in policy approach is in relation to the existing use of the building. If a building's use is classed as a dwelling then any intention to subdivide into smaller (more affordable) dwelling units is considered to be consistent with the aims of the Plan. It would be unviable if these units were also required to be subject to a local occupancy tie. Whereas guesthouses are a different use class (C1) and are considered to be business premises. Owners have generally bought the premises as a hotel/guesthouse to run as a business. The intention is therefore to retain/safeguard the business premises as visitor accommodation unless it can be demonstrated that it is no longer viable. If it is demonstrated that the business use is no longer viable and housing is sought, it is not considered to be unreasonable to ensure that homes to address local affordable needs are provided, subject to viability. It is recognised in the Plan (Policy RT-D3 Safeguarding Serviced Accommodation) that some smaller guesthouses are likely to have been single dwellings in the past and therefore the policy does enable such guesthouses to revert to a dwelling if the tests are met.	NO CHANGE REQUIRED
0058 0058/19	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	HC-D15 - Residential Extensions	Modifications sought include deletion of: the 35% increase in criterion 1.c); and criterion 2.c) in relation to dwellings immune from enforcement.	The 35% increase takes forward an established approach for extensions to existing dwellings. This proportion is considered to help address the needs of homeowners, whilst maintaining a balanced stock of dwelling types and sizes. Dwellings immune from enforcement that were established through a certificate of lawful use rather than planning permission are considered to be ineligible for extensions – however ENPA consider that extensions may be permissible where such dwellings would otherwise comply with policies in the Plan (permitted development rights will still apply).	Proposed change to clause 2.c) so as to not rule out extensions where dwellings immune from enforcement would otherwise comply with policies in the Plan.
0061 0061/04	Mr Mervyn Orchard-Lisle Monksilver Parish Council	Not Stated	Not Stated	Not Stated	HC-D15 - Residential Extensions	Monksilver PC are concerned at the 90sqm threshold for affordable housing due to this not adequately meeting the space needs for larger families needing affordable housing - flexibility is required. Further concern relates to all housing being limited to affordable housing which is considered to disregard and disadvantage the proportion of the population who can afford to buy and support the local economy, and result in putting a premium on larger houses.	No evidence is provided to substantiate this assertion. Local affordable housing with a 90sqm net internal floorspace has been delivered since 2005 within the National Park. Housing controlled by Registered Providers can be larger than 90sqm to provide for larger families in housing need. The Authority has considered the implications of the Technical Housing Standards - nationally described space standards and proposes to change the 90sqm net internal floorspace requirement to 93sqm gross internal area to be consistent with the space standards for a 3 bed, 5 person, two-storey home in HC-S2 A Balanced Housing Stock. It is considered that clause 2.a) of the policy could be deleted with additional clarification in the text regarding extensions to affordable housing.	Proposed change: delete clause 2.a) and provided additional clarification within the text regarding extensions to affordable dwellings.

ISSUES RAISED BY RESPONDENTS - EXMOOR NATIONAL PARK AUTHORITY RESPONSE AND ACTIONS

Respondent number/ Representation number	Name Company/ organisation	Legal Compliance	Complies with Duty	Plan sound?	Plan section, paragraph or policy	Summary of representation	Authority Response	Proposed Actions
0063 0063/11	Sue Green Home Builders Federation Ltd	Not Stated	Not Stated	No	HC-D17 - Replacement Dwellings	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.	The Authority has considered the implications of the Technical Housing Standards - nationally described space standards and proposes to change the 90sqm net internal floorspace requirement to 93sqm gross internal area to be consistent with the space standards for a 3 bed, 5 person, two storey home in HC-S2 A Balanced Housing Stock.	Proposed change: amend 90sqm net internal floorspace to be consistent with nationally described space standards – as 93sqm gross internal area.
0069 0069/02	Joe Keech Devon County Council	Not Stated	Not Stated	Not Stated	Para. 6.200	If a significant need arises from housing development in and around Lynton, developer contributions may be sought towards library provision.	Noted. The Lyn Plan (Lynton & Lynmouth Neighbourhood Development Plan) is the development plan for Lynton together with the strategic policies within the Local Plan; including those development management policies where the Lyn Plan is silent or indeterminate. The main focus is for affordable housing provision, and significant growth is not consistent with the approach of the neighbourhood plan or the Local Plan.	NO CHANGE REQUIRED
0017 0017/08	Mr Duncan Jeffray Exmoor Society	Not Stated	Not Stated	Not Stated	7 Achieving a Sustainable Economy	The Society believes that Objective 15 should take priority over Objective 14 as it integrates economic development with environmental achievement.	Noted. However, the policy approach is to encourage business development in the National Park where negative impacts are avoided and the economic benefit of the high quality environment is sustained.	NO CHANGE REQUIRED
0066 0066/02	Mr Richard Briden	Not Stated	Not Stated	No	Para. 7.9	Concern that the popularity of serviced accommodation is declining and therefore will not offer future opportunities for employment. Further consultation with tourism businesses is required to have direct input. Policies are required to tackle the rapidly aging population on Exmoor which are high net users of health and public services.	Consultation events were held with tourism providers which provided the basis for policy RT-D3 Safeguarding Serviced Accommodation that includes a flexible approach in enabling smaller hotels and guesthouses which were previously single dwellings to revert to a dwelling. Policies also have regard to the delivery of housing for older or more vulnerable people.	NO CHANGE REQUIRED

ISSUES RAISED BY RESPONDENTS - EXMOOR NATIONAL PARK AUTHORITY RESPONSE AND ACTIONS

Respondent number/ Representation number	Name Company/ organisation	Legal Compliance	Complies with Duty	Plan sound?	Plan section, paragraph or policy	Summary of representation	Authority Response	Proposed Actions
0015 0015/01	Mr Nigel Furze	No	Not Stated	No	Para. 7.14	The objection relates to the fact that the Publication Draft Local Plan does not enable the redevelopment of brownfield land in the open countryside. The respondent considers that this does not accord with the NPPF. Modifications are sought to change the wording of policy SE-S1 so that employment sites and buildings are not safeguarded in the open countryside. Amendment to policy SE-S2 to specify that previously developed applies to brownfield sites. A further amendment to SE-S3 to provide for the redevelopment of brownfield land in the open countryside and the same requirement in policy RT-D6 specifically for camping barns.	It is considered important to safeguard all employment sites, whether they are in settlements or the open countryside as a means to ensure that adequate provision for employment and business continues in the future. A proposed change to policy SE-S3 Business Development in the Open Countryside will enable the redevelopment of existing employment sites for business use where there are existing buildings on site that have been directly utilised by employees as employment premises.	Proposed change: amendment to SE-S3 and supporting text regarding the redevelopment of existing employment sites in the open countryside.
0015 0015/02	Mr Nigel Furze	No	Not Stated	No	Para. 7.29	The objection relates to the fact that the Publication Draft Local Plan does not enable the redevelopment of brownfield land in the open countryside. The respondent considers that this does not accord with the NPPF. Such sites are considered to have negative visual amenity impacts if neglected.	It is acknowledged that the Plan does not provide for the potential for, or extent of, redevelopment opportunities of employment buildings in the open countryside; this is required to ensure consistency between business development policies and the safeguarding policy SE-D2. The supporting text and policy SE-S3 will be amended to provide the necessary tests for the redevelopment of employment sites for business use in the open countryside.	Proposed change: amendment to SE-S3 and supporting text regarding the redevelopment of existing employment sites in the open countryside.
0015 0015/03	Mr Nigel Furze	No	Not Stated	No	SE-S1 - A SUSTAINABLE EXMOOR ECONOMY	The objection relates to the fact that the Publication Draft Local Plan does not enable the redevelopment of brownfield land in the open countryside. The respondent considers that this does not accord with the NPPF. Modifications are sought to change the wording of policy SE-S1 so that employment sites and buildings are not safeguarded in the open countryside.	It is considered important to safeguard all employment sites, whether they are in settlements or the open countryside as a means to ensure that adequate provision for employment and business continues in the future. A proposed change to policy SE-S3 Business Development in the Open Countryside will enable the redevelopment of existing employment sites for business use where there are existing buildings on site that have been directly utilised by employees as employment premises.	Proposed change: amendment to SE-S3 and supporting text regarding the redevelopment of existing employment sites in the open countryside.
0067 0067/16	The Crown Estate	Yes	Yes	No	SE-S1 - A SUSTAINABLE EXMOOR ECONOMY	TCE support this policy and please to see it has been made more succinct. To provide greater certainty, further clarity is required for applicants in relation to the likely constraints in terms of scale and intensity that may restrict further growth.	Proposals where the scale and intensity of a proposed business development, or an extension to an existing development, are likely to significantly impact on the character and appearance of the landscape or other special qualities of the National Park, are likely to be considered major development in the context of policy GP2 Major Development.	Proposed change: reference 'major development' policy (GP2) in paragraph 7.17.

ISSUES RAISED BY RESPONDENTS - EXMOOR NATIONAL PARK AUTHORITY RESPONSE AND ACTIONS

Respondent number/ Representation number	Name Company/ organisation	Legal Compliance	Complies with Duty	Plan sound?	Plan section, paragraph or policy	Summary of representation	Authority Response	Proposed Actions
0015 0015/04	Mr Nigel Furze	No	Not Stated	No	SE-S2 - BUSINESS DEVELOPMENT IN SETTLEMENTS	<p>The objection relates to the fact that the Publication Draft Local Plan does not enable the redevelopment of brownfield land in the open countryside. The respondent considers that this does not accord with the NPPF.</p> <p>Amendment suggested to policy SE-S2 to specify that previously developed applies to brownfield sites.</p>	<p>It is considered important to safeguard all employment sites, whether they are in settlements or the open countryside as a means to ensure that adequate provision for employment and business continues in the future. The supporting text (para. 7.22) states that brownfield land applies to existing buildings and previously developed land in settlements. A proposed change to policy SE-S3 Business Development in the Open Countryside will enable the redevelopment of existing employment sites for business use where there are existing buildings on site that have been directly utilised by employees as employment premises.</p>	<p>NO CHANGE REQUIRED to policy SE-S2. Proposed change: amendment to SE-S3 and supporting text regarding the redevelopment of existing employment sites in the open countryside.</p>
0043 0043/36	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	SE-S2 - BUSINESS DEVELOPMENT IN SETTLEMENTS	<p>Support subject to some rephrasing of criterion 2 to ensure they read as sequential and reflect the supporting text.</p>	<p>Noted - minor adjustments to the position of the text so clause 2 is read sequentially.</p>	<p>Proposed change: minor amendments to clause 2 so it is read sequentially and reflects the supporting text.</p>
0058 0058/21	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	SE-S2 - BUSINESS DEVELOPMENT IN SETTLEMENTS	<p>BE considers that policy SE-S2 should not differentiate between traditional and non-traditional buildings and reference to small scale should be deleted.</p>	<p>The policy presents a sequential test to business development within settlements. If applicants/landowners can demonstrate that they cannot provide business development through the change of use of existing buildings as these are not available or not in their ownership/control, then other alternatives including new build will be considered. The policy intends that applicants explore all opportunities before considering new build on greenfield sites given the limited landscape capacity for new build development. The term 'small scale' is used in relation to new build development in Porlock Weir - given the character of this small, attractive harbour settlement, it is considered that this terminology is justified.</p>	<p>NO CHANGE REQUIRED</p>
0015 0015/05	Mr Nigel Furze	No	Not Stated	No	SE-S3 - BUSINESS DEVELOPMENT IN THE OPEN COUNTRYSIDE	<p>The objection relates to the fact that the Publication Draft Local Plan does not enable the redevelopment of brownfield land in the open countryside. The respondent considers that this does not accord with the NPPF.</p> <p>A further amendment suggested to SE-S3 to provide for the redevelopment of brownfield land in the open countryside.</p>	<p>It is acknowledged that the Plan does not provide for the potential for, or extent of, redevelopment opportunities of employment buildings in the open countryside; this is required to ensure consistency between business development policies and the safeguarding policy SE-D2. The supporting text and policy SE-S3 will be amended to provide the necessary tests for the redevelopment of employment sites for business use in the open countryside.</p>	<p>Proposed change: amendment to SE-S3 and supporting text regarding the redevelopment of existing employment sites in the open countryside.</p>

ISSUES RAISED BY RESPONDENTS - EXMOOR NATIONAL PARK AUTHORITY RESPONSE AND ACTIONS

Respondent number/ Representation number	Name Company/ organisation	Legal Compliance	Complies with Duty	Plan sound?	Plan section, paragraph or policy	Summary of representation	Authority Response	Proposed Actions
0043 0043/37	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	SE-S3 - BUSINESS DEVELOPMENT IN THE OPEN COUNTRYSIDE	Support for policy SE-S3 subject to provide further clarification in relation to criterion 3.d) and use of the term 'may'.	Noted - change 'may' to 'will'. Given the GPDO flexible use class for agricultural buildings - it is considered that Clause 3.d) will only apply to larger agricultural buildings in most cases therefore changing the word 'may' to 'will' means the building could revert to agricultural use without the need for planning permission.	Proposed change: Replace 'may' with 'will' within clause 3.d).
0058 0058/22	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	SE-S3 - BUSINESS DEVELOPMENT IN THE OPEN COUNTRYSIDE	Policy SE-S3 should not differentiate between traditional and non-traditional buildings, nor should buildings be redundant. Modifications sought include the deletion of paragraphs 3, 4 and 5. Points raised are considered not in accordance with the NPPF.	The policy presents a sequential test to business development in the open countryside. For rural land-based businesses additional flexibility is provided to enable the change of use of non-traditional buildings (e.g. including modern agricultural buildings) to business use. If buildings, such as agricultural buildings, are not redundant then it is considered that they are in use and therefore needed by the agricultural enterprise.	NO CHANGE REQUIRED
0067 0067/17	The Crown Estate	Yes	Yes	No	SE-S3 - BUSINESS DEVELOPMENT IN THE OPEN COUNTRYSIDE	TCE would encourage the amendment of the policy so it is less restrictive by not constraining new build to be solely within Local Service Centres and Villages. To enable strong rural communities and reduce the out-migration of young people TCE consider that businesses are viable in the rural areas of the Park and would allow for circumstances where new build development is appropriate, or the location/relocation of a business in a building not well related to other built forms. TCE particularly notes the importance of farm diversification opportunities that help to sustain existing farm enterprises and creates new jobs for local residents.	Policy SE-S3 seeks to widen opportunities for rural businesses, and provides scope for business enterprise by making positive use of the significant resource of traditional buildings or modern buildings relating to rural land-based businesses. The policy will be amended to ensure that existing employment sites can be redeveloped for employment use to ensure a continuing resource of employment sites. The policy approach is to primarily provide for new build business development in the named settlements where it can be accommodated within or well-related to the existing built environment. New build business development can be provided in the open countryside in relation to home-based businesses (policy SE-D1) which provides additional scope for business development across the National Park - an appropriate response to the high percentage of working age people working at or from home (37%).	Proposed change: amendment to SE-S3 and supporting text regarding the redevelopment of existing employment sites in the open countryside.
0120 0120/16	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated	SE-S3 - BUSINESS DEVELOPMENT IN THE OPEN COUNTRYSIDE	Policy is supported. However, as many agricultural buildings are historic, the policy should cross reference to relevant policies elsewhere in the plan.	Noted - appropriate cross referencing to policies CE-S4 Cultural Heritage and Historic Environment and CE-D3 Conserving Heritage Assets will be provided in the supporting text. The policy cross references to CE-S5 Principles for the Conversion or Structural Alteration of Existing Buildings which will cross reference CE-S4 and CE-D3 accordingly.	Proposed change: cross referencing to policies CE-S4 Cultural Heritage and Historic Environment and CE-D3 Conserving Heritage Assets will be provided in the supporting text.

ISSUES RAISED BY RESPONDENTS - EXMOOR NATIONAL PARK AUTHORITY RESPONSE AND ACTIONS

Respondent number/ Representation number	Name Company/ organisation	Legal Compliance	Complies with Duty	Plan sound?	Plan section, paragraph or policy	Summary of representation	Authority Response	Proposed Actions
0058 0058/23	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	SE-D1 - Home Based Businesses	BE seek to modify policy SE-D1 through the deletion of criterion 1.b) in relation to extensions which should be assessed against the needs of the business.	The premise of policy HC-D1 Home Based Businesses is to encourage new businesses and entrepreneurship - recognising that a large proportion of the working age population work at/from home and similarly many are self-employed. The policy provides a flexible approach that enables extensions, conversions of outbuildings or provision of new outbuildings for home-based business use - but these can revert to domestic use. Therefore the extensions policy is aligned to policy HC-D15 Residential Extensions.	NO CHANGE REQUIRED
0067 0067/18	The Crown Estate	Yes	Yes	No	SE-D1 - Home Based Businesses	The policy is considered unsound and limited in scope. No consideration is given to converting existing buildings to live-work arrangements, and the benefits of such an approach are held no higher than domestic dwellings - this is considered to be a missed opportunity and does not reflect the growing number of people working from home which is a significant factor in the local economy. The conversion of rural buildings to live-work units is considered to offer a range of benefits to the economy and environment, and reduce the need to travel by car. This type of development is supported by the NPPF (para. 21).	The conversion of existing buildings in the open countryside enables the provision of extended family dwellings (on farmsteads) and local affordable homes (in hamlets and on farmsteads). The conversion of an additional or the same building(s) as business space is also permitted which would be conducive to a live-work arrangement. Similar schemes have been already been provided in the National Park.	Proposed change: Explanation provided in the supporting text and clause 3 of policy SE-D1 will be amended to ensure that the employment space element of live-work can be used independently of the living accommodation.
0058 0058/24	Mr Mark Sanders Business Exmoor	Not Stated	Not Stated	Not Stated	SE-S4 - AGRICULTURAL AND FORESTRY DEVELOPMENT	Modifications sought include criterion 1.c), clause 2 and clause 3 of the policy as they are considered to be contrary to the NPPF and GPDO.	The preferred approach is to site new agricultural/forestry buildings alongside existing buildings on the enterprise to ensure development is grouped and sited in such a way that landscape impacts are minimised. Isolated barns will only be permitted in exceptional circumstances due to the adverse impacts such large isolated buildings can have on the National Park, particularly in relation to landscape character and visual amenity of. If development is permitted through the GPDO then policy SE-S4 will only apply where prior approval is required in relation to design, siting, and external appearance of the building.	NO CHANGE REQUIRED
0017 0017/09	Mr Duncan Jeffray Exmoor Society	Not Stated	Not Stated	Not Stated	8 Achieving Enjoyment for All	The Society seeks clarity in relation to whether large scale recreation events have to apply for planning permission. They consider that the reinstatement of the Lynton and Barnstaple Railway is sensible.	Recreation events can generally be held without the need for planning permission unless it exceeds 28 days in a calendar year although some exceptions will apply (General Permitted Development Order 2014 - Schedule 2 Temporary Buildings and Uses - Class B).	NO CHANGE REQUIRED

ISSUES RAISED BY RESPONDENTS - EXMOOR NATIONAL PARK AUTHORITY RESPONSE AND ACTIONS

Respondent number/ Representation number	Name Company/ organisation	Legal Compliance	Complies with Duty	Plan sound?	Plan section, paragraph or policy	Summary of representation	Authority Response	Proposed Actions
0070 0070/03	Mr Paul Williamson British Association for Shooting and Conservation	Not Stated	Not Stated	Not Stated	Para. 8.12	BASC raises concern in relation to clay pigeon grounds being inappropriate within the National Park and request that this assertion is deleted.	Clay pigeon shooting grounds are considered to provide an example of a type of recreational development that is likely to be unsuitable within the National Park due to the potential to have a sustained impact on tranquillity, a special quality of the National Park, as the noise generated is essentially year-round in one area. This does not prevent the temporary use of such land for clay pigeon shooting events under the GPDO (unless within a SSSI).	NO CHANGE REQUIRED
0043 0043/39	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	RT-S1 - RECREATION AND TOURISM	Support for policy RT-S1 subject to clarification on whether criteria 2.a) to g) are inclusive or exclusive.	The intention is that the policy provides general principles for recreation and tourism development in the National Park, and the associated development management policies provide further detail in relation to location, design etc.	Proposed change: amend the end of clause 1 to state "in accordance with the following principles:" then list a) to g).
0067 0067/19	The Crown Estate	Yes	Yes	No	RT-S1 - RECREATION AND TOURISM	TCE consider the policy to be unsound due to a lack of clarity regarding emphasis placed on 'quiet enjoyment' and 'experience of tranquillity' which gives the impression that any activity that does not fall into this category will be refused - TCE question how these developments be categorised. It is recommended that these terms are defined and consider the economic benefits of tourist activities such as the Dunster Forest scheme.	Noted - the supporting text does provide a cross reference to policy CC-S7 Pollution which includes noise pollution. Further information can be found in relation to noise pollution in para. 5.151. Suggested that paragraph 5.151 is also referenced in the supporting text to policy RT-S1 (para. 8.12) to assist with clarifying this issue.	Proposed change: reference para. 5.151 in the supporting text (para. 8.12).
0043 0043/40	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	RT-D2 - Staff Accommodation	Support for policy RT-D2 subject to clarification on the requirements of criterion 1 and moving text to ensure the tests are read as sequential and reflect para. 8.26.	Comment noted - policy clause to be amended to reflect the representation.	Proposed change: amend policy to adjust the wording to ensure tests are read sequentially.

ISSUES RAISED BY RESPONDENTS - EXMOOR NATIONAL PARK AUTHORITY RESPONSE AND ACTIONS

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0066 0066/09	Mr Richard Briden	Not Stated	No	No	RT-D3 - Safeguarding Serviced Accommodation	Considers that the policy would oblige owners to enter into a contract to sell the property which owners have no intention of fulfilling - greater flexibility required for guesthouses that only operate for 6/7 months of the year and are in reality dwellings.	The owners of a hotel/guesthouse can only change the use to a dwelling through a planning application. Such premises have generally been intentionally purchased by the owners as a hotel/guesthouse to run as a business. The intention is therefore to retain/safeguard visitor accommodation unless it can be demonstrated that it is no longer viable. Policy RT-D3 Safeguarding Serviced Accommodation does provide flexibility to enable some smaller guesthouses that can be demonstrated to have been single dwellings in the past, to revert to a dwelling if the tests are met.	NO CHANGE REQUIRED
0066 0066/01	Mr Richard Briden	No		No	Para. 8.37	Concern that no opportunity to influence the use of existing open market homes as second/holiday homes has not been implemented when advised that an Article 4 direction could be used to ensure that no planning permissions would be granted for such homes. ENPA should consult with the Planning Minister on how human rights legislation relates to this issue.	Any Article 4 direction would have to apply to all existing dwellings in the National Park - as any open market dwelling that does not have an occupancy tie has the potential to become a second home or holiday home. This would be an unduly onerous requirement for many households across the National Park who may wish to extend their home through permitted development rights.	NO CHANGE REQUIRED
0015 0015/06	Mr Nigel Furze	No	Not Stated	No	Para. 8.49	The objection relates to the fact that the Publication Draft Local Plan does not enable the redevelopment of brownfield land in the open countryside. The respondent considers that this does not accord with the NPPF. The respondent considers that policy RT-D6 is too restricted and does not provide for lawful buildings in the open countryside (other than agricultural buildings) to be redeveloped to a new use as holiday accommodation. Concern also raised in relation to a requirement for toilet and washing facilities that should be provided in remote locations.	Policy RT-D6 Camping Barns provides opportunities for an isolated traditional barn or building to be converted to simple camping barn accommodation – sometimes referred to as ‘stone tents’. This is not restricted to agricultural buildings. The isolated nature of some of these buildings means that the provision of services such as water and electricity could adversely impact on the setting and historic fabric of the building - as with concepts such as wild camping there are no washing or WC facilities - however composting toilets could be provided or where isolated traditional buildings are close to water/electricity supplies and highway access then opportunities for increased service provision are available. Given the range of traditional buildings available for conversion it is not considered that brownfield redevelopment is necessary to provide for this type of accommodation.	NO CHANGE REQUIRED

ISSUES RAISED BY RESPONDENTS - EXMOOR NATIONAL PARK AUTHORITY RESPONSE AND ACTIONS

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0015 0015/07	Mr Nigel Furze	No	Not Stated	No	RT-D6 - Camping Barns	The objection relates to the fact that the Publication Draft Local Plan does not enable the redevelopment of brownfield land in the open countryside. The respondent considers that this does not accord with the NPPF. The respondent considers that policy RT-D6 is too restricted and does not provide for lawful buildings in the open countryside (other than agricultural buildings) to be redeveloped to a new use as holiday accommodation. Concern also raised in relation to a requirement for toilet and washing facilities that should be provided in remote locations. An amendment suggested to RT-D6 to provide for the redevelopment of brownfield land in the open countryside specifically for camping barns.	Policy RT-D6 Camping Barns provides opportunities for an isolated traditional barn or building to be converted to simple camping barn accommodation - sometimes referred to as 'stone tents'. This is not restricted to agricultural buildings - the term 'traditional building' is defined in the glossary. The isolated nature of some of these buildings means that the provision of services such as water and electricity could adversely impact on the setting and historic fabric of the building - as with wild camping there are no washing or WC facilities - however composting toilets could be provided or where isolated traditional buildings are close to water/electricity supplies and highway access then opportunities for increased service provision are available. Given the range of traditional buildings available for conversion it is not considered that brownfield redevelopment is necessary to provide for this type of accommodation.	NO CHANGE REQUIRED
0043 0043/41	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	RT-D6 - Camping Barns	Object to the policy as the meaning of 2.b) needs to be clarified as to its association with 2.a) and c).	Noted - clause two wording will be amended to provide clarification. Sub-clause 2.c) will be removed as this is a policy requirement in AC-D6 Fixed Line Transmission Infrastructure.	Proposed change: Clause 2 will be amended by deleting clause 2.c) and ensuring the meaning of 2.a) and b) is clarified.
0071 0071/04	Mr Roger Watts	Not Stated	Not Stated	No	Para. 8.55	Concern is raised about existing caravan sites and opportunities for replacing these sites with development more appropriate such as open air folk museums. Requested that the word 'new' is deleted from the policy.	Planning permission would be required for any development or change of use of existing caravan sites to other uses which would need to be consistent with policies in the Local Plan.	NO CHANGE REQUIRED
0052 0052/11	Anthony Meakin Lynton & Lynmouth Town Council	Not Stated	Not Stated	Not Stated	RT-D7 - Certificated Caravan and Touring Caravan Sites	Plan should specifically reference the policy approach to motor homes.	Noted - additional reference will be made to motorhomes in association with the supporting text (para 8.55) to policy RT-D7 Certificated Caravan Sites and Touring Caravan Sites.	Proposed change: include additional reference to motorhomes in paragraph 8.55.
0048 0048/01	Mr Hugh Thomas Greater Exmoor Shoots Association	Not Stated	Not Stated	Not Stated	Para. 8.73	GESA recommend certain modifications to para. 8.73 regarding the use of land for game bird shooting and established rights. A further amendment in relation to seeking consents from Natural England in SSSIs, is also requested.	It is not considered that the wording proposed to be inserted within paragraph 8.73 is accurate. Advice is already provided in the Exmoor Shoot Guidelines on the ENPA website, and given the many variations game-shooting and the breeding of game-birds can take and the nature of enterprises, it is considered that advice should be sought from the Authority regarding individual proposals.	NO CHANGE REQUIRED

ISSUES RAISED BY RESPONDENTS - EXMOOR NATIONAL PARK AUTHORITY RESPONSE AND ACTIONS

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0069 0069/13	Joe Keech Devon County Council	Not Stated	Not Stated	Not Stated	Para. 8.95	Update reference to refer to the Devon ROWIP 2012.	The Devon ROWIP 2012 is an update to the 2005 ROWIP – both are relevant as the 2005 contains a detailed section regarding the area of Devon within Exmoor National Park. The references will be updated to ensure both Devon and Somerset ROWIPs are included.	Proposed change: amend references to include - Somerset RoWIP (2) 2015 and Appendices Devon RoWIP (1) 2005 (2) 2012
0045 0045/01	Mrs Pauline Clarke	Yes	Yes	No	Para. 8.94 RT-D12 - Access Land and Rights of Way	Modifications are sought in relation to the supporting text to policy RT-D12 in respect of clarifying various types of land owners/managers and providing reference to national guidelines to safeguard users' interests.	Noted - the text will be amended to reflect this representation with input from the ENPA Rights of Way Officer.	Proposed change: amend text in paragraph 8.94 to include reference to land owners, and safeguarding users' interests.
0016 0016/01	Mr David Grob	Not Stated	Not Stated	No	Para. 8.98	Respondent states the plan is not sound in relation to the reinstatement of the Lynton & Barnstaple Railway - concern raised regarding the misuse of private and public funds and the impact this proposed attraction would have on the western gateway to the National Park. Not considered to be an effective transport system. The track bed of the former railway should be preserved as an historic asset.	Policy RT-S2 Reinstatement of The Lynton & Barnstaple Railway is within the section relating to recreation and enjoyment of the National Park, it is therefore considered that the reinstatement of the railway, particularly within the National Park will be primarily a tourist attraction, although the longer term aspirations as a transport connection between Lynton and Barnstaple are recognised. The Exmoor National Park Partnership Plan recognises the priority to "maintain high quality rights of way, services and facilities to enable people to explore and experience the special qualities of the National Park". This includes a strategic activity to "promote and facilitate more sustainable modes of travel to Exmoor and leisure use within the National Park". Action B2.15 is for partners to "Support opportunities for new and improved access and travel modes including Lynton and Barnstaple Railway..." The dismantled railway is an important heritage asset, and the policy ensures that the reinstatement closely replicates the former railway as far as possible within modern guidelines and legislative requirements. The Plan should be read as a whole, so other policies in the Plan will also be considered in determining any future proposals in including those relating to landscape, biodiversity and the historic environment.	NO CHANGE REQUIRED

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Respondent number/ Representation number	Name Company/ organisation	Legal Compliance	Complies with Duty	Plan sound?	Plan section, paragraph or policy	Summary of representation	Authority Response	Proposed Actions
0018 0018/01	Mrs Louise Grob	No	No	No	Paras. 8.98, 8.103 RT-D13 - Safeguarding Land Along Former Railways	<p>The respondent considers the plan is not legally compliant, does not comply with the duty to cooperate and is not sound.</p> <p>The main points raised are in relation to the safeguarding of former railways and the reinstatement of the Lynton & Barnstaple Railway (policies RT-D13 and RT-S2 respectively) which are summarised below:</p> <ul style="list-style-type: none"> • The railway should not be reinstated as no longer required as a suitable transport link and has failed twice previously – there is nothing sustainable about the proposal. • The Lynton and Barnstaple Railway Trust (L&BRT) do not operate a railway or transport network, it is an unjustified, speculative, tourist attraction without the potential to become a viable or sustainable transport network. • A39 follows part of the former track bed and diversion of the track bed would require substantial building ground works and land reinforcement, also risks of cross winds, woodland and flooding exist along the aspirational extension. • Reinstatement would make land (including respondents) unfarmable, other impacts cited include disruptions to the peace and tranquillity of the area from the noise and smell of the trains, as well as the wildlife habitats of protected species, and crowded roads which struggle to support local traffic and make our homes and community unfavourable. • Does not enhance the enjoyment of Exmoor nor complies with national policy. <p>Modifications proposed relate to the removal of text relating to the “reinstatement of Lynton & Barnstaple Railway” and deletion of paragraph 8.103.</p>	<p>No substantive evidence has been provided to underpin the views made by the respondent. Policy RT-S2 Reinstatement of The Lynton & Barnstaple Railway is within the section relating to recreation and enjoyment of the National Park, it is therefore considered that the reinstatement of the railway, particularly within the National Park will be primarily a tourist attraction, although the longer term aspirations as a transport connection between Lynton and Barnstaple are recognised. The dismantled railway is an important heritage asset, so the policy ensures that the reinstatement closely replicates the former railway as far as possible within modern transport and health and safety guidelines/legislative requirements. The Plan should be read as a whole, so other policies in the Plan will also be considered in determining any future proposals including those relating to landscape, biodiversity, historic environment and pollution. The experience of tranquillity is an important special quality of the National Park particularly in relation to wide open areas of moorland, [Exmoor National Park Partnership Plan 2012-2017]. Consideration will be given to the impacts of noise pollution in policy CC-S7 Pollution.</p>	NO CHANGE REQUIRED

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0018 0018/02	Mrs Louise Grob	No	No	No	Paras. 8.104, 8.106, 8.109, 8.110 RT-D13 - Safeguarding Land Along Former Railways	<p>The respondent considers the plan is not legally compliant, does not comply with the duty to cooperate and is not sound.</p> <p>The main points raised are in relation to the safeguarding of former railways and the reinstatement of the Lynton & Barnstaple Railway (policies RT-D13 and RT-S2 respectively) which are summarised below.</p> <ul style="list-style-type: none"> • The Lynton and Barnstaple Railway Trust (L&BRT) do not operate a railway or transport network, it is an unjustified, short-term, speculative, seasonal tourist attraction without the potential to become a viable or sustainable transport network. The West Somerset Railway is considered to lose money and fails to attract interest. • L&BRT are alleged to have sought to compulsory purchase land and there has been no compromise or consultation with landowners. Landowners have not been properly consulted about the change of use of their farmland. • A change of use to recreation would fundamentally change the nature of Exmoor – community diluted by railway enthusiasts. • Problems for narrow-gauge railway reinstatement cited regarding weather and terrain relating to potential derailment – water shortage was also formerly an issue. • Reinstatement would make land (including respondents) unfarmable, other impacts cited include disruptions to the peace and tranquillity of the area from the noise and smell of the trains, as well as the wildlife habitats of protected species. Modifications proposed relate to the removal of text “recreation “and “potential for sustainable modes of travel within Exmoor National Park” in para 8.104. <p>Para 8.109 - safeguarding LBR is not considered to 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.</p>	<p>No substantive evidence has been provided to underpin the views made by the respondent. Policy RT-S2 Reinstatement of The Lynton & Barnstaple Railway is within the section relating to recreation and enjoyment of the National Park, it is therefore considered that the reinstatement of the railway, particularly within the National Park will be primarily a tourist attraction, although the longer term aspirations as a transport connection between Lynton and Barnstaple are recognised. The Exmoor National Park Partnership Plan recognises the priority to “maintain high quality rights of way, services and facilities to enable people to explore and experience the special qualities of the National Park”. This includes a strategic activity to “promote and facilitate more sustainable modes of travel to Exmoor and leisure use within the National Park”. Action B2.15 is for partners to “Support opportunities for new and improved access and travel modes including Lynton and Barnstaple Railway...” The dismantled railway is an important heritage asset, so the policy ensures that the reinstatement closely replicates the former railway as far as possible within modern transport and health and safety guidelines/legislative requirements. The Plan should be read as a whole, so other policies in the Plan will also be considered in determining any future proposals including those relating to landscape, biodiversity, historic environment and pollution. The experience of tranquillity is an important special quality of the National Park particularly in relation to wide open areas of moorland, [Exmoor National Park Partnership Plan 2012-2017]. Consideration will be given to the impacts of noise pollution in policy CC-S7 Pollution. The provision of access to farmland split by any proposed reinstatement will be a matter for the applicant to demonstrate and will be a material planning consideration that will take be taken into account.</p>	NO CHANGE REQUIRED

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0041 0041/01	Mr William Grob	Not Stated	No	No	Paras. 8.98, 8.103 RT-D13 - Safeguarding Land Along Former Railways	<p>The respondent considers the plan is not legally compliant, does not comply with the duty to cooperate and is not sound.</p> <p>The main points raised are in relation to the reinstatement of the Lynton & Barnstaple Railway (policy RT-S2) which are summarised below:</p> <ul style="list-style-type: none"> • The aspirations of the Lynton and Barnstaple Railway Trust are speculative and not justifiable or deliverable. Historically documented to be unsafe and unviable. • The Lynton and Barnstaple Railway is not a justifiable transport link, only a tourist attraction which is parallel to the A39 and offers no better view. • The plan has not addressed landowners appropriately and underestimated geological constraints. • No suitable infrastructure including parking or highway access in Parracombe. • Land would become unfarmable when split by the railway. • Would not enhance the access and enjoyment of area risks alienating more people that it could attract. <p>Modifications proposed to Section 8 include removing text relating to the Reinstatement of the Lynton & Barnstaple Railway and deleting paragraph 8.103.</p>	<p>No substantive evidence has been provided to underpin the views made by the respondent. Policy RT-S2 Reinstatement of The Lynton & Barnstaple Railway is within the section relating to recreation and enjoyment of the National Park, it is therefore considered that the reinstatement of the railway, particularly within the National Park will be primarily a tourist attraction, although the longer term aspirations as a transport connection between Lynton and Barnstaple are recognised. The Exmoor National Park Partnership Plan recognises the priority to “maintain high quality rights of way, services and facilities to enable people to explore and experience the special qualities of the National Park”. This includes a strategic activity to “promote and facilitate more sustainable modes of travel to Exmoor and leisure use within the National Park”. Action B2.15 is for partners to “Support opportunities for new and improved access and travel modes including Lynton and Barnstaple Railway...” The dismantled railway is an important heritage asset, so the policy ensures that the reinstatement closely replicates the former railway as far as possible within modern transport and health and safety guidelines/legislative requirements. The Plan should be read as a whole, so other policies in the Plan will also be considered in determining any future proposals including those relating to landscape, biodiversity, historic environment, transport and parking, and pollution. The experience of tranquillity is an important special quality of the National Park particularly in relation to wide open areas of moorland, [Exmoor National Park Partnership Plan 2012-2017]. Consideration will be given to the impacts of noise pollution in policy CC-S7 Pollution. The provision of access to farmland split by any proposed reinstatement will be a matter for the applicant to demonstrate and will be a material planning consideration that will be taken into account.</p>	

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0018 0018/03	Mrs Louise Grob	No	No	No	Paras. 8.110, 8.111 RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	<p>The respondent considers the plan is not legally compliant, does not comply with the duty to cooperate and is not sound.</p> <p>The main points raised are in relation to the reinstatement of the Lynton & Barnstaple Railway (policy RT-S2) which are summarised below:</p> <ul style="list-style-type: none"> • The Lynton and Barnstaple Railway 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 effected by its proposal. • Huge expense of public money better spent on improving accessibility in other ways and on other tourist initiatives. • A change of use to recreation would fundamentally change the nature of Exmoor – community diluted by railway enthusiasts. • Reinstatement would have significant impacts including on wildlife and the character of the area, as well as making it difficult for farmers to manage their land. <p>Modifications proposed to policy RT-S2 are to preserve the historic track bed rather than reinstatement of the railway and the following:</p> <ul style="list-style-type: none"> • Requirement for owner cooperation or approval for purchase of original/existing buildings or the development of new buildings in association with reinstatement of the railway – distinction needed in relation to historic buildings and temporary buildings. • Concern about new dwellings for railway workers. • The policy would not allow a bridge to be constructed of modern safety standards. • Policy should not allow for the line to become a public right of way. • No suitable parking or highway access in Parracombe. • Concern about the impact on Grade I St Petrocks Church. 	<p>No substantive evidence has been provided to underpin the views made by the respondent. Policy RT-S2 Reinstatement of The Lynton & Barnstaple Railway is within the section relating to recreation and enjoyment of the National Park, it is therefore considered that the reinstatement of the railway, particularly within the National Park will be primarily a tourist attraction, although the longer term aspirations as a transport connection between Lynton and Barnstaple are recognised. The Exmoor National Park Partnership Plan recognises the priority to “maintain high quality rights of way, services and facilities to enable people to explore and experience the special qualities of the National Park”. This includes a strategic activity to “promote and facilitate more sustainable modes of travel to Exmoor and leisure use within the National Park”. Action B2.15 is for partners to “Support opportunities for new and improved access and travel modes including Lynton and Barnstaple Railway...” The dismantled railway is an important heritage asset, so the policy ensures that the reinstatement closely replicates the former railway as far as possible within modern transport and health and safety guidelines/legislative requirements. The Plan should be read as a whole, so other policies in the Plan will also be considered in determining any future proposals including those relating to landscape, biodiversity, historic environment, transport and parking, and pollution. The experience of tranquillity is an important special quality of the National Park particularly in relation to wide open areas of moorland, [Exmoor National Park Partnership Plan 2012-2017]. Consideration will be given to the impacts of noise pollution in policy CC-S7 Pollution. The provision of access to farmland split by any proposed reinstatement will be a matter for the applicant to demonstrate and will be a material planning consideration that will be taken into account. Any new dwellings provided for railway workers would need to be in accordance with housing policies in the Local Plan (section 6). The policy does not seek to allow the line to become a public right of way - the aim is to ensure that access to stations/halts can be achieved by sustainable modes of transport including walking and cycling.</p>	

ISSUES RAISED BY RESPONDENTS - EXMOOR NATIONAL PARK AUTHORITY RESPONSE AND ACTIONS

0042 0042/01	Miss Ella Hunt	No	No	No	Paras. 8.98, 8.103 RT-S2 - REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY	<p>The respondent considers the plan is not legally compliant, does not comply with the duty to cooperate and is not sound.</p> <p>The main points raised are in relation to the reinstatement of the Lynton & Barnstaple Railway (policy RT-S2) which are summarised below:</p> <ul style="list-style-type: none"> • The aspirations of the Lynton and Barnstaple Railway Trust are speculative and not justifiable or deliverable. Historically documented to be unsafe and unviable. • The Lynton and Barnstaple Railway has little heritage authenticity, and is not a justifiable transport link, only a tourist attraction which is parallel to the A39 and offers no better view. Only links one car park to another and would require further transport links to Lynton and Barnstaple. • The plan has not addressed landowners appropriately and underestimated geological constraints and impacts on wildlife and tranquillity, as well as significant ground works and purchase of the respondent's buildings. • No suitable infrastructure including parking or highway access in Parracombe. • Land would become unfarmable when split by the railway and takes away the livelihood of farmers. • Would not enhance the access and enjoyment of area risks alienating more people that it could attract. Improvements to the A39 would be preferable. <p>Modifications proposed to policy RT-S2 are to preserve the historic track bed rather than reinstatement of the railway and the following:</p> <ul style="list-style-type: none"> • Requirement for owner cooperation or approval for purchase of original/existing buildings or the development of new buildings in association with reinstatement of the railway – distinction needed in relation to historic buildings and temporary buildings. • Concern about new dwellings for railway workers. • The policy would not allow a bridge to be constructed of modern safety standards. • Policy should not allow for the line to become a public right of way. • No suitable parking or highway access in Parracombe. • Concern about the impact on Grade I St Petrocks Church. 	<p>No substantive evidence has been provided to underpin the views made by the respondent. Policy RT-S2 Reinstatement of The Lynton & Barnstaple Railway is within the section relating to recreation and enjoyment of the National Park, it is therefore considered that the reinstatement of the railway, particularly within the National Park will be primarily a tourist attraction, although the longer term aspirations as a transport connection between Lynton and Barnstaple are recognised. The Exmoor National Park Partnership Plan recognises the priority to “maintain high quality rights of way, services and facilities to enable people to explore and experience the special qualities of the National Park”. This includes a strategic activity to “promote and facilitate more sustainable modes of travel to Exmoor and leisure use within the National Park”. Action B2.15 is for partners to “Support opportunities for new and improved access and travel modes including Lynton and Barnstaple Railway...” The dismantled railway is an important heritage asset, so the policy ensures that the reinstatement closely replicates the former railway as far as possible within modern transport and health and safety guidelines/legislative requirements. The Plan should be read as a whole, so other policies in the Plan will also be considered in determining any future proposals including those relating to landscape, biodiversity, historic environment, transport and parking, housing, and pollution. The experience of tranquillity is an important special quality of the National Park particularly in relation to wide open areas of moorland, [Exmoor National Park Partnership Plan 2012-2017]. Consideration will be given to the impacts of noise pollution in policy CC-S7 Pollution. The provision of access to farmland split by any proposed reinstatement will be a matter for the applicant to demonstrate and will be a material planning consideration that will be taken into account. Any new dwellings provided for railway workers would need to be in accordance with housing policies in the Local Plan (section 6). The policy does not seek to allow the line to become a public right of way - the aim is to ensure that access to stations/halts can be achieved by sustainable modes of transport including walking and cycling.</p>	
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ISSUES RAISED BY RESPONDENTS - EXMOOR NATIONAL PARK AUTHORITY RESPONSE AND ACTIONS

Respondent number/ Representation number	Name Company/ organisation	Legal Compliance	Complies with Duty	Plan sound?	Plan section, paragraph or policy	Summary of representation	Authority Response	Proposed Actions
0069 0069/16	Joe Keech Devon County Council	Not Stated	Not Stated	Not Stated	Para. 9.9	DCC consider than clause i) may be unnecessary and j) may restrict improvements to A39 where schemes could be justified and necessary.	ENPA consider that the clauses reflect the National Parks Circular and should be retained. A case for new roads and widening can be made where significant environmental gain or community benefit can be achieved.	NO CHANGE REQUIRED
0069 0069/15	Joe Keech Devon County Council	Not Stated	Not Stated	Not Stated	AC-S2 - TRANSPORT INFRASTRUCTURE	DCC consider that retaining or replacing like for like street furniture may be challenging in their current/future funding and maintenance policy context. Discussions would be beneficial to ensure it is provided in a way that reflects local character.	Further clarification was sought from DCC who responded ' <i>The inference is that we do support like for like within the park. But that this has to be subject to future funding and corresponding maintenance policies as opposed to a guarantee. If for some reason we can't provide like for like then suitable changes would need to be discussed/agreed with ENP.</i> ' This is already reflected in para 9.6 'The NPA will encourage Highways Authorities to ensure that maintenance or improvement works are carried out to the highest environmental standards and in keeping with local character'. Section 62 of the Environment Act places a duty on all public bodies to have regard to National Park purposes in fulfilling their functions.	NO CHANGE REQUIRED
0069 0069/17	Joe Keech Devon County Council	Not Stated	Not Stated	Not Stated	AC-S2 - TRANSPORT INFRASTRUCTURE	DCC consider than clause i) may be unnecessary and j) may restrict improvements to A39 where schemes could be justified and necessary.	Further clarification was sought from DCC who responded ' <i>the wording may appear to be too restrictive for road improvements required to manage any traffic from new developments. But that in the overall context of the park this was not a significant concern with the wording</i> '. ENPA consider that no amendments to the policy wording is required, but criteria (i) and (j) will be separated out as new clauses (2 and 3) to provide a distinction from clause 1.	Proposed change: amend criteria i) and j) to clauses 2 and 3.
0120 0120/22	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated	AC-S2 - TRANSPORT INFRASTRUCTURE	Policy is supported. However, transport infrastructure has the potential to harm the historic environment, therefore the policy should cross reference to relevant policies elsewhere in the plan.	AC-S2 1(a) refers to the character of the local landscape and built environment, which would include the historic environment. Reference to historic features is included in para 9.6. The plan should be read as a whole and cross reference to CE-S4 Cultural Heritage and Historic Environment is not considered to be necessary.	NO CHANGE REQUIRED

ISSUES RAISED BY RESPONDENTS - EXMOOR NATIONAL PARK AUTHORITY RESPONSE AND ACTIONS

Respondent number/ Representation number	Name Company/ organisation	Legal Compliance	Complies with Duty	Plan sound?	Plan section, paragraph or policy	Summary of representation	Authority Response	Proposed Actions
0069 0069/18	Joe Keech Devon County Council	Not Stated	Not Stated	Not Stated	Paras. 9.20-9.22	Information provided in relation to road maintenance categories. The A39 through Lynton & Lynmouth is not a county primary route for traffic as not suitable for some larger vehicles. It is also considered that 'local freight routes' may not be suitable for 'local access only' as A and B roads in the Park are important for local freight movements - suggest this is clarified to ensure local access is encouraged but not fully restricted to just local access. Further discussion may be necessary.	Further clarification sought from DCC who responded ' <i>The B road network is the promoted freight route through the park. Local Freight Routes (Cross boundary regional freight routes http://www.devon.gov.uk/regional-freight-map.pdf) The A39 has equal status but is the route that has most access issues for larger vehicles within Devon. The draft plan was promoting the A roads for heavy traffic and potentially restricting access to the lower category road network for local deliveries. This is not something we support</i> '. This was not the intention of the draft Local Plan and so the wording in relation to a 'route hierarchy' is proposed to be removed from paragraph 9.20. Reference to County Freight Routes is proposed to be removed from paragraph 9.22 as these are not relevant to the Exmoor Route Network, with only a small section of the A399 within the National Park being a County Freight Route. The wording of paragraph 9.22 should be amended in relation to the Local Freight Route to remove reference to 'for local access only'. This change was also agreed with Somerset County Council as the original wording 'for local access only' reflected their Freight Strategy map. SCC confirmed that they were happy with the changes providing the text retains the wording encouraging HGVs away from the National Park in order to minimise heavy traffic using the local routes, whilst recognising that access to Exmoor is required by these types of vehicles. Text proposed to be added to paragraph 9.21 regarding the restrictions on a number of roads in the National Park (including the A39 at Lynton & Lynmouth) due to steep gradients or restricted junctions.	Proposed changes to paragraphs 9.20, 9.21 and 9.22 to reflect the representation from DCC.
0069 0069/19	Joe Keech Devon County Council	Not Stated	Not Stated	Not Stated	Para. 9.24	DCC suggest that policy AC-S3 incorporates text in 9.24 relating to the principle of avoiding adverse impacts from parking on the highway.	Noted – propose to include additional text to amend 3.b) to state: "this relieves traffic and parking pressure elsewhere in the locality, including adverse impacts arising from parking on the highway"	Proposed change: amend clause 3.b) in policy AC-S3 to reflect adverse impacts arising from parking on the highway.
0043 0043/45	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	AC-S3 - TRAFFIC MANAGEMENT AND PARKING	Support subject to clarification on the tests listed within criterion 3 (which are inclusive and which are exclusive).	Noted - propose to combine sub-clauses 3.a) and b) with the main text of clause 3 leaving the remaining sub-clauses as inclusive.	Proposed change: amend clause 3 to ensure the tests are clear.
0069 0069/20	Joe Keech Devon County Council	Not Stated	Not Stated	Not Stated	AC-S3 - TRAFFIC MANAGEMENT AND PARKING	DCC suggest that policy AC-S3 incorporates text in 9.24 relating to the principle of avoiding adverse impacts from parking on the highway.	Noted - include additional text to amend 3.b) to state: "this relieves traffic and parking pressure elsewhere in the locality, including adverse impacts arising from parking on the highway"	Proposed change: amend clause 3.b) in policy AC-S3 to reflect adverse impacts arising from parking on the highway.

ISSUES RAISED BY RESPONDENTS - EXMOOR NATIONAL PARK AUTHORITY RESPONSE AND ACTIONS

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0063 0063/12	Sue Green Home Builders Federation Ltd	Not Stated	Not Stated	No	AC-D3 - Parking Provision and Standards	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 that "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".	Policy AC-D3 states that " appropriate provision for parking including for bicycles, motorcycles, disabled users and car sharing, guided by the standards set out in Table 9.1". It is considered that the policy approach complies with national policy as minimum or maximum standards are not imposed - the standards provided seek to guide appropriate parking provision in relation to certain use classes.	NO CHANGE REQUIRED
0065 0065/04	Mr David Latham Porlock Parish Council	Yes	Yes	No	AC-D3 - Parking Provision and Standards	Parking guidelines for hotels is considered to be inappropriate - a modification is sought to increase the parking provision to 1 space per bedroom.	The parking standards provided seek to guide appropriate parking provision in relation to certain use classes - in certain locations the availability of public car parks may also provide additional parking capacity for visitors staying in the locality.	NO CHANGE REQUIRED
0072 0072/09	Mrs Susan May Exmoor Trust	Not Stated	Not Stated	Not Stated	AC-D3 - Parking Provision and Standards	Concern raised regarding parking costs and the need to encourage visitors to park all day.	The Plan does not provide for parking charges.	NO CHANGE REQUIRED
0050 0050/01	Laura Kelly National Grid	Not Stated	Not Stated	No	AC-S4 - ELECTRICITY AND COMMUNICATIONS NETWORKS	National Grid considers that the Plan is not consistent with national policy in relation to policy AC-S4 as it contradicts National Policy Statement EN1 and NPPF para. 116 where major infrastructure may be granted in protected landscapes in exceptional circumstances. National Grid recommends the policy is amended to reflect national policy.	Nationally significant infrastructure has a separate consent regime which has regard to National Policy Statements. Policy AC-S4 seeks to resist proposals for major and nationally significant electricity and communications networks, however a cross reference to policy GP2 Major Development is provided which sets out the tests for major development in National Parks consistent with the approach in para. 116 of the NPPF.	NO CHANGE REQUIRED
0064 0064/01	Mr Bruce Pollard Western Power Distribution	Yes	Yes	No	AC-S4 - ELECTRICITY AND COMMUNICATIONS NETWORKS	Western Power consider that the requirements of AC-S4 must be considered alongside their legal obligation to offer economic connections and operate an economic and efficient network. Modifications are sought for criterion 2.a) and clause 3 to be amended to reflect this legal obligation. It is also requested to note that Western Power would seek to retain the position of electricity circuits at 132kV and 66 kV and in some cases 33kV.	The duty for statutory undertakers to have regard to National Park statutory purposes under section 62 of the Environment Act 1995. Legal advice is that the S.62 of the Environment Act would take precedence and no changes are required to clause 2(a). The amendment to introduce a sequential approach to Policy AC-D6 would provide alternative policy options where undergrounding may not be suitable. Economic factors will be dealt with through the recharging of customers which electricity companies tend to do for connections to properties.	NO CHANGE REQUIRED
0120 0120/24	Mr Ross Simmonds Historic England	Not Stated	Not Stated	Not Stated	AC-D5 - Radio and Mobile Telecommunications Infrastructure	Policy is supported. However, the implications of such development should recognise the potential harm to the historic environment, therefore the policy should cross reference to relevant policies elsewhere in the plan.	Noted - propose to amend AC-D5 4 (c) to include the historic environment. Reference to CE-S4 is already made in para 9.52 to ensure that any implications in relation to buildings including those of a historical or traditional character are considered.	Proposed change: reference the historic environment in clause 4.c).

ISSUES RAISED BY RESPONDENTS - EXMOOR NATIONAL PARK AUTHORITY RESPONSE AND ACTIONS

Respondent number/ Representation number	Name Company/ organisation	Legal Compliance	Complies with Duty	Plan sound?	Plan section, paragraph or policy	Summary of representation	Authority Response	Proposed Actions
0050 0050/02	Laura Kelly National Grid	Not Stated	Not Stated	No	AC-D6 - Fixed Line Transmission Infrastructure	National Grid is concerned that criterion 1 of policy AC-D6 is not consistent with policy guidance within National Policy Statements EN1 and EN5 where there is no general rule about when an overhead line should be considered unacceptable.	Nationally significant infrastructure has a separate consent regime which has regard to National Policy Statements. Policy AC-S4 seeks to resist major and nationally significant electricity and communications networks, however a cross reference to policy GP2 Major Development is provided which sets out the tests for major development in National Parks consistent with the approach in para. 116 of the NPPF. It is proposed to amend policy AC-D6 to introduce a sequential approach so that undergrounding is considered first, before other options of providing the need are sought (low carbon and renewable energy development). Where either of these options is not possible then overhead lines would be permitted where these do not cause unacceptable harm to visual amenity or landscape character.	Proposed change: amend policy to provide a sequential approach to the provision of new transmission lines.
0064 0064/02	Mr Bruce Pollard Western Power Distribution	Yes	Yes	No	AC-D6 - Fixed Line Transmission Infrastructure	Western Power do not object to underground routing of cables but the policy requirements of AC-D6 should take into account their legal obligation to offer economic connections and operate an economic and efficient network. Modifications are sought for clauses 1, 2 and 3 to be amended to reflect this legal obligation. It is also requested to note that Western Power would seek to retain the position of electricity circuits at 132kV and 66 kV and in some cases 33kV. Developers would normally be expected to pay to divert 11kV circuits which may include undergrounding.	The duty for statutory undertakers to have regard to National Park statutory purposes under section 62 of the Environment Act 1995. Economic factors will be dealt with through the recharging of customers which electricity companies tend to do for connections to properties. It is proposed to amend policy AC-D6 to introduce a sequential approach so that undergrounding is considered first, before other options of providing the need are sought (low carbon and renewable energy development). Where either of these options is not possible then overhead lines would be permitted where these do not cause unacceptable harm to visual amenity or landscape character. Proposals for new development will be expected to provide underground cables, unless material considerations dictate otherwise.	Proposed change: amend policy to provide a sequential approach to the provision of new transmission lines.
0043 0043/47	Mr Andrew Austen North Devon Council				Para. 10.2	Mineral Safeguarding Areas to be added to the legend for the Policies Map.	See comments (0043/16) relating to the deletion of policy CE-S8 Minerals Safeguarding Areas	NO CHANGE REQUIRED
0043 0043/48	Mr Andrew Austen North Devon Council	Yes	Yes	Yes	Inset map legend	Change terminology from Proposals Map to Policies Map.	Noted	Proposed change: amend 'Proposals Map' to 'Policies Map'.

ISSUES RAISED BY RESPONDENTS - EXMOOR NATIONAL PARK AUTHORITY RESPONSE AND ACTIONS

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0063 0063/13	Sue Green Home Builders Federation Ltd	Not Stated	Not Stated	No	ES-S2 - LYNTON AND LYNMOUTH NEIGHBOURHOOD PLAN	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.	Policy ES-S2 does ensure that development proposals are determined in accordance with the neighbourhood plan and the strategic policies of the Local Plan. The policy will be amended to provide further clarification to ensure that strategic policies of the plan have precedence in the determination of planning proposals within the neighbourhood plan area.	Proposed changes: amend text in paragraph 10.88 to explain how decisions will be taken in the neighbourhood plan area. Also amend policy ES-S2 to ensure strategic policies of the Local Plan have precedence in the determination of proposals within the neighbourhood plan area.
0061 0061/06	Mr Mervyn Orchard-Lisle Monksilver Parish Council	Not Stated	Not Stated	Not Stated	10 Exmoor's Settlements Paras. 10.89 - 10.94	Clarification required in the text in relation to the 'historic settlement core' shown on the settlement inset maps.	Noted – propose to include a reference in the glossary to the 'historic settlement core'.	Proposed change: amend the Glossary to include the 'historic settlement core'.
0071 0071/05	Mr Roger Watts	Not Stated	Not Stated	No	Inset Map 7 - Dulverton	Concern raised regarding the boundary of the historic settlement core and why this only relates to part of the respondent's property, and the Iron Age Hillfort is not included.	The following methodology was used to redraw the historic settlement cores: - Tithe Map – include the buildings and the rear boundaries of associated plots within the settlement core areas. This includes farmsteads (with immediate paddocks but not entire fields) etc. which are on the edge of the main settlement areas. - 1st Edition – include buildings and gardens only. - 2nd Edition - not in use.	NO CHANGE REQUIRED
0033 0033/04	Mr Tim Hambly Environment Agency	Yes	Yes		Page 307	Monitoring indicator for CC-S7, CC-D2 and CC-D5 should be amended to relate to the "percentage" of monitored rivers achieving 'good' or 'high' ecological status.	Noted - propose to amend indicators to include "percentage" of monitored rivers achieving 'good' or 'high' ecological status.	Proposed change: amend indicators to include "percentage" of monitored rivers achieving 'good' or 'high' ecological status.