

# 2014

## DRAFT LOCAL PLAN SCHEDULE OF CONSULTATION RESPONSES



Draft Local Plan  
November 2013



WITH REGARD TO: DRAFT LOCAL PLAN CONSULTATION  
NOVEMBER – DECEMBER 2013

**For further information regarding the preparation of the Local Plan please visit the National Park Authority website:**

**[www.exmoor-nationalpark.gov.uk/planning/planning-policy](http://www.exmoor-nationalpark.gov.uk/planning/planning-policy)**

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The following schedule of responses relate to the Draft Exmoor National Park Local Plan consultation held between 4 November – 10 December 2013 under regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012.

Overall 143 separate representations were received – generating 917 separate comments on various aspects of the Local Plan.

## DRAFT LOCAL PLAN CONSULTATION REPRESENTATIONS

### Consultation November – December 2013

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
<b>SUSTAINABILITY APPRAISAL</b>		
Mr Ross Simmonds English Heritage South West	1 dlp749 General Comment	SUSTAINABILITY APPRAISAL We have no comments to make on the Sustainability Appraisal Report Exmoor National Park Draft Local Plan.
Amanda Grundy Natural England	1 dlp769 Support - subject to amendments	<p>Sustainability Appraisal We are satisfied the Sustainability Appraisal has provided a systematic assessment of the draft Plan in terms of its consistency with the principles of sustainable development, including social and economic as well as likely environmental effects. We also consider the sustainability objectives to be clear and relevant to the national park, and that the SA findings and recommendations have helped to refine emerging policies. We are also largely satisfied that the requirements of the requirements of the Strategic Environmental Assessment (SEA) Directive have been met. However, while we welcome the NPA's commitment to work with adjoining authorities to support networks of green infrastructure, the Plan's relationship with emerging plans of neighbouring authorities would benefit from further detail.</p> <p>Amendment: We suggest the next iteration of the SA (SEA) report should further explain the plan's relationship to those of neighbouring authorities which would demonstrate how these have been taken into account in the preparation of the plan. It should also help to ensure potential conflicts and opportunities have been identified and promote a coordinated cross boundary approach.</p>
<b>HABITAT REGULATIONS ASSESSMENT</b>		
Amanda Grundy Natural England	1 dlp768 Support	Habitats Regulations Assessment: We consider the draft Habitats Regulation Assessment (HRA) provides an appropriately detailed and systematic assessment of draft Plan in terms of its likely effect on European Sites both within and beyond the Plan area. We are satisfied that the conclusion of the HRA that implementation of the draft Plan is not likely to result in significant effect on European protected sites appears reasonable.

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<b>SECTION 1 - INTRODUCTION</b>		
Mrs S Squire Kentisbury & Trentishoe Parish Councils	1 dlp604 Support	In principle we think the document is well prepared and covers all aspects of planning within our community, but are disappointed that the National Planning Policy Framework appears to overrule local decision making.
Mr Martyn Dunn South West Water	1 dlp276 General Comment	I refer to the above document the content of which is noted and upon which South West Water has no specific comment.
Richard Croucher	1 dlp304 Support	As someone now in exile away from Exmoor, I take a keen interest in everything concerned with what I regard as Britain's prettiest and nicest National Park. I am e-mailing to offer my support in all you are trying to achieve to improve the facilities and attractiveness of the area and to bring economic support.
Peter Ford	1 dlp322 Support	Having read this document I wish to register my support for the draft proposal of this plan
Dave Ogborne Wessex Water	1 dlp348 General Comment	Thank you for the invitation to comment on the draft Local Plan. We note that no major development sites are planned for the national park.
Janet Powell Heart of the South West LEP	1 dlp349 General Comment	Thank you for your email inviting the LEP to take part in your Draft Exmoor National Park Local Plan Consultation. However, the Heart of the South West LEP is unable to make a formal response at this time, as we are currently drafting our own strategic economic plans. We have taken note of your timescales which are similar to ours and once we have formed our own strategic economic plan we will be more prepared to respond to such consultations in the future.
Mrs Marilyn Crothers Nettlecombe Parish Council	1 dlp384 General Comment	Presumably the maps and diagrams within the text will be in colour?

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Alan Morgan	1 dlp386 General Comment	1. General: I have read the draft local plan summary carefully and consulted the full plan where necessary. I feel I should state that the summary is an excellent document which gives a thorough review of the full plan. The main document is easy to understand and the illustrations and maps are superb. Altogether a very well-produced set of documents. I attended the consultation meeting at Porlock on Monday the 18th November and this was also a very worthwhile exercise led by a very competent Chairman supported by very good presentations by the ENP staff. This promoted a very useful discussion. With respect to the contents and logic of the plan I wish to make it clear that whilst I am a long standing member of the Wootton Courtenay Parish Council the views that I am expressing are my own and do not necessarily reflect the opinions of the council or any other member of that august body.
Alan Morgan	1 dlp387 Support	9. Conclusion: Altogether a well-considered Planning Document to be recommended.
Dr Duncan Jeffray Exmoor Society	1 dlp414 Support - subject to amendments	<p>General Comments: The Society finds the Draft Local Plan to be a detailed, comprehensive and cleverly formulated document, which has involved a huge amount of work. It sets out, and in our view generally succeeds in striking, a balance between achieving National Park Purposes and a presumption in favour of Sustainable Development. The Vision, Strategic Priorities and Objectives sections provide a sound foundation for the detailed policies that follow.</p> <p>However, the Society has some reservations about the breadth of vision and objectives set out at the beginning of the document. We wonder whether, admirable though they may be, there is an over optimistic view of the ability to deliver all these objectives. When the boundaries were drawn of this and other National Parks, towns and larger Service Centres were excluded making it impossible to provide all the desired facilities. By its very nature, with a small population spread over a large rural area, some facilities have to be delivered outside the Park. This will make it difficult for all young people of working age to find work suitable to their aspirations and qualifications in the Park. Similarly, with the ongoing reduction of public transport it will be very difficult to reduce the use of the car. It is felt that some of the aspirations set out in the policies are likely to be unachievable. The Society recognises that not all the background material provided in the document can or should be included in the Policies. However, we feel that it needs to be made clearer that the supporting text is relevant and will be taken into account when making decisions. Whilst it seems unlikely that one can expect applicants or even their agents to be familiar the whole plan it must be made clear that there are links between policies within any one section and may be across several sections.</p>

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		<p>There is a need for indexing and cross-referencing to help applicants find their way about this highly complex document. The Society considers that this is such a different document from the previous one that a programme of training for officers and members will be essential. Whilst pre-application advice will help to steer applicants through the complexities of the new plan, it is thought that a more efficient way of introducing the changes to agents, would be through training sessions specific to their needs.</p>
<p>Mrs Becky Collier Campaign for the Protection of Rural England - Somerset Branch</p>	<p>1 dlp605 Support</p>	<p>CPRE Somerset supports the strategic policies and the development management policies of the ENP Draft Local Plan, November 2013 as they reflect our own core goals of CPRE Somerset's Charter to Save the Countryside. CPRE's Save Our Countryside Charter underlines that while England's countryside is beautiful, irreplaceable and finite, it is increasingly it is being destroyed by badly planned developments, while local communities are left powerless to protect the places they love. Our open spaces are being destroyed unnecessarily. Previously developed brownfield sites should be re-used first. The ENP Draft Plan supports this. The cards are stacked in favour of developers. We want a democratic planning system that gives local people a stronger voice. The ENP Draft Plan does this. Re housing- in the right places. The country needs affordable homes. They must be sensitively located, with excellent environmental standards and high quality design. The ENP Draft Plan agrees with this.</p>
<p>Mr Martin Wilsher West Somerset District Council</p>	<p>1 dlp800 General Comment</p>	<p>Inconsistent approach to referencing other documents and sources of information throughout the Local Plan. Where documents/sources are referenced through footnotes, these are usually by title (some-times incomplete) and paragraph/page number only. In some instances, no indication is given of authorship/statement-of-responsibility and/or publisher which can be critical in searching for the right source of the original information. In some instances a title of a publication is provided in the text but no reference given via a footnote. In other parts of the text there it alludes to the existence of a document without specifically identifying it (e.g. para.7.20, 3rd sentence refers to changes in 'Right-to-Buy' legislation (H.M. Government; Housing Act 1980, Chapter 51 (as amended); H.M.S.O.; 1980; pp.1- 3.) but no source is provided).</p>
<p>Mr Martin Wilsher West Somerset District Council</p>	<p>1 dlp801 General Comment</p>	<p>Some documents are referred to in the text do not currently exist, such as, Exmoor Housing Supplementary Planning Document. These mentions should be deleted until the documents exist in some form in the public domain.</p>



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Mr Martin Wilsher West Somerset District Council	1 dlp802 General Comment	Absence of consistent comparison of Census-based data providing the characteristics of the Exmoor National Park particularly in relation to its immediate Local Authority and Local Planning Authority neighbours. This makes it difficult to gauge how distinctive these characteristics are.
Mr Martin Wilsher West Somerset District Council	1 dlp803 General Comment	Development plan protocol has required in the past that policies in local plan documents are written in bold and with upper-case characters in order to distinguish them from other text in the plan.
Mr Martin Wilsher West Somerset District Council	1 dlp804 General Comment	Many of the policies contain extensive cross-referencing to other policies within the Local Plan. This is un-necessary and they should be deleted except where there is a very close policy link between the policies concerned. Any development proposals should be considered in the context of all relevant policies in the plan. In order to avoid excessive cross-referencing, suggest inclusion of a notification/reminder as footer on each page; 'The Local Plan should be read as a whole. Proposals for development will be assessed against all the relevant policies in the Local Plan.'
Mr Martin Wilsher West Somerset District Council	1 dlp805 General Comment	Many of the policies are excessive in their length and content and, very complex. This can make them virtually incomprehensible to most people, their understanding of the planning system and, how it works. It could have the result of deterring people from engaging with the process constructively and effectively when they need to do so. The restrictive and negative tenor of the wording of many of the policies appears contrary to the enabling development 'spirit' proposed through the NPPF. This is likely to work against the ability of the development plan to manage development proposals effectively. Many of the policies should be reduced in length and made more concise and focused as to what they are individually attempting to achieve. Much of the content would be better located in the supporting text providing a justification for the respective policy and an explanation as to how it should be applied.
Marlene Allinson Cutcombe Parish Council	1 dlp287 General Comment	The Parish Council appreciates that an awful lot of work has gone into this document and that such a Plan is difficult to produce and cross-reference. Public Consultation is welcomed, but it was not clear if the recent round of Consultation meetings was open to the public or were these meetings just for members of Parish Councils? Also, details of these meetings did not appear on ENPA website. Is the general public to be consulted only by sending in Consultation Response Forms or via the website? If so, then it is felt that 'engaging with the community'

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		could be improved. General Layout of the document Not easy to find sections: if at least the main sections as listed on pages vi and vii could have page number references it would be easier to navigate one's way through. Because it is such a large document it is somewhat daunting and off-putting and any elements which can be incorporated to make the document easier to use would be welcomed. The Inset Map Legend on page ? (opposite 248) needs to be in colour: would be much easier to use if it was. Note: this page is not numbered but after this page 248 appears as a right-hand page: even- numbered pages should always be on the left, odd-numbered pages on the right. We would strongly recommend that the Inset Map Legend page is numbered as page 248 and that the pagination will, therefore, become correct thereafter. The Future: Timescale When will this plan come into force and the previous one become redundant?
Mrs Jill Jones	1 dlp429 General Comment	Confusing: Many of the policies are confusing and set out in a convoluted way- perhaps this is deliberate to allow for 'wriggle room'. However greater clarity would help the public. An extended version of the chart on P 17 of the printed booklet 'Draft Local Plan Summary', with cross referencing to the policy numbers, would help. In the light of this I think it ESSENTIAL to ensure the continuation of the 'planning surgery' sessions. Resources: The new plan is likely to generate a higher workload for the planning department. How will they deal with this and where will the resources come from?
Mark Funnell National Trust	1 dlp576 <b>Object</b>	Given the mixing of strategic policies and development management policies throughout the plan it would be helpful to more clearly identify which policies are strategic. It is also important to ensure that the strategic policies provide enough safeguards as development management policies can potentially be varied through neighbourhood plans. Policy ES-S2 (Lynton and Lynmouth Neighbourhood Plan), under paragraph 11.44, makes clear that: 'Should a conflict arise between development management policies in the Local Plan and the policies in the Neighbourhood plan, the conflict will be resolved in favour of the Neighbourhood Plan', and 'development management policies in the Local Plan will only be given greater weight where the Neighbourhood Plan is silent, indeterminate or out of date.' Matters such as dark skies (policy CE-D1) and the more detailed policy on heritage assets (CE-D3) arguably should not be simply relegated to development management policies which can be interfered with by individual neighbourhoods through their plans. (See also comment on undeveloped coast under Section 5)
Brig. David Godsall Winsford Parish Council	1 dlp618	The staff of Exmoor National Park are congratulated on a very impressive and comprehensive Draft Plan - the result of a lot of hard work and dedication.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
	General Comment	
Mr William Selwyn	1 dlp658 Support	All is excellent.
Angela Atkinson Marine Management Organisation	1 dlp750 General Comment	<p>Thank you for inviting the Marine Management Organisation (MMO) to comment on the above consultation. The MMO has reviewed the consultation document and whilst we have no specific comments to submit we would like to draw to your attention the work and remit of the MMO as you may wish to be aware of this in relation to this work. As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring mark there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. In our duty to take all reasonable steps to ensure compatibility with existing development plans, which apply down to the low water mark, we are seeking to identify the 'marine relevance' of applicable plan policies. The MMO began planning for the East area, which stretches from Flamborough Head to Felixstowe, in April 2011 and consultation on the draft plans closed on 8th October 2013. The next round of planning began in 2013 in the South plan area. Until such time as a marine plan is in place for the South West plan area we advise local authorities to refer to the Marine Policy Statement for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the UK Marine Policy Statement unless relevant considerations indicate otherwise. The Marine Policy Statement will also guide the development of Marine Plans across the UK. More information can be found at <a href="http://www.defra.gov.uk/news/2011/03/18/marine-policy-statement/">http://www.defra.gov.uk/news/2011/03/18/marine-policy-statement/</a> The MMO is also responsible for issuing marine licences under the Marine and Coastal Access Act 2009. A marine licence may be needed for activities involving a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. Any works may also require consideration under The Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended) and early consultation with the MMO is advised. We would suggest that reference to this be made within planning documents to ensure that necessary regulatory requirements are covered. We would encourage applicants to engage early with the MMO alongside any application for planning consent to ensure that the consenting process is as efficient as possible. If you have any questions or need any further</p>

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		information please just let me know. More information on the role of the MMO can be found on our website <a href="http://www.marinemanagement.org.uk">www.marinemanagement.org.uk</a>
South West HARP Planning Consortium	1 dlp751 Support - subject to amendments	<p>We represent the South West HARP Planning Consortium which includes all the leading Housing and Registered Providers (HARPS) across the South West. Our clients' principal concerns are to optimise the provision of social/affordable housing and to ensure the evolution and preparation of consistent policies throughout the region. Overarching Comments We are supportive of the draft Local Plan, but subject to the amendments outlined below.</p> <p>We have a fundamental concern about the manner in which the Plan is written. The language is confusing, terminology is lacking definition and in most cases the policies and their supporting text are overly complicated, making it difficult not just for planning professionals but also for laymen to understand and apply. We are thus concerned that the Council is pursuing a Plan that will exclude many if its potential users; it is vital that this is remedied by substantial rewording before it is progressed towards submission for examination. It also is important that the Council recognises the need for certainty if our clients are to deliver housing in the National Park. The Plan is quite clear on the need for affordable housing, referring to the substantial affordability gap that is present. Overly complicated and even restrictive policies will not achieve certainty. Definitions and how they will be applied must be clearly defined in the supporting text with reference to assessment criteria.</p>
Amanda Grundy Natural England	1 dlp767 Support	General: We have considered the draft Plan and supporting information. Overall Natural England finds much to welcome in this document, in our opinion it should provide a positive framework for shaping and managing future development sustainably in Exmoor National Park and reflects the priorities set out the Exmoor National Park Partnership Plan. The draft Plan appears to be based on sound evidence and a good understanding of the area, including its special qualities, current issues and future needs, and to have taken consultation feedback into account.
Mr Ross Simmonds English Heritage South West	1 dlp678 General Comment	Thank you for the opportunity to comment on this important document. The historic environment appears as a balanced and integrated topic in the Draft Local Plan, the maintenance of which is key to the Exmoor's sustainable future. To be compliant with the NPPF local development plans should include: 1. strategic policies to deliver conservation and enhancement of the historic environment 2. identify land where development would be inappropriate, for instance because of its environmental or historic significance 3. a clear strategy for enhancing the historic environment 4. a positive strategy for the conservation enjoyment of the historic environment including heritage assets most at risk of neglect, decay

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		and other threats, recognising they are an irreplaceable resource. Exmoor's plan appears to broadly achieve these aims. As a key component of sustainable development, protecting and enhancing the historic environment appears not to have been undertaken as an isolated activity, but is integral to it. This is to be applauded. It appears to want to achieve sustainable development, economic, social and environmental gains jointly and simultaneously through the planning system (NPPF Paragraph 7-9). As such Exmoor's Local Plan considers and provides policy and guidance as to what role the historic environment might play in delivering and supporting, a range of policy sectors, such as housing in the countryside; good design; renewable and low carbon energy; role and function of places.
Susan Green Home Builders Federation (HBF)	1 dlp760 General Comment	For the Exmoor Local Plan to be found sound under the four tests of soundness defined by Paragraph 182 of the NPPF, the Local Plan must be positively prepared, justified, effective and compliant with national policy. There are a number of concerns about the soundness of the Draft Local Plan in its current written form as discussed in the preceding paragraphs [see Home Builders Federation comments].
The Crown Estate	1 dlp771 General Comment	As a general observation it is felt that rather than referring to other policies within policies which, may cause confusion, the NPA may be better off stating: 'proposals must accord with other relevant policies contained within the Plan'.
Mrs Molly Groves Exmoor Uprising	1 dlp870 General Comment	2. As far as we are concerned the most important issue is Affordable local housing. 3. If anyone knows which the climate will change this might be worthwhile but they don't so it has to take its course as always. 4. Support that to the full in any way we can. 5. If it ain't broke don't mend it. Conserve and enhance leave it well alone.
Dr Duncan Jeffray Exmoor Society	1 dlp423 General Comment	THE 20 YEAR LIFE OF THE PLAN The Society recognises that every effort has been made to make the Plan as 'future proof' as possible. We are concerned however that some totally new and unforeseen situation may arise that renders parts of the Plan inadequate to deal with the new circumstances. Should such a situation arise and we hope it would be possible to modify the Plan despite the difficulties. The Society is seriously concerned about a proposal, at present out to consultation, suggesting that Permitted Development Rights for agricultural buildings, barns etc. would be introduced to allow conversion into dwellings. This would have a devastating effect on the Park, and would undermine many of the Housing Policies in the Plan. Should this circumstance arise, we presume that an extensive rewriting will be required and that a new consultation would be undertaken. Finally, the Society draws attention to the fact that the Local Plan will last for the next 20 years whilst the National Park Partnership Plan lasts for five years. The latter will be rewritten three or perhaps four times during the life of the

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		Plan. It is essential that these two documents are and remain closely linked so that each can build on the strength from the other.
Mr Martin Wilsher West Somerset District Council	1 dlp793 General Comment	Absence of a clearly defined development plan strategy for the Exmoor National Park. - Section 1 deals with the national context with regard to the purpose of national parks, national planning policy and the process of producing a Local Plan. The absence of a clear development plan strategy makes it difficult to identify the strategic issues both within and outside of the Exmoor National Park that may need addressing through the 'duty to co-operate' provisions established through Section 110 of the Localism Act. (H.M. Government; Localism Act 2011, Chapter 20; The Stationary Office; 2011; ISBN 0 10 542011 8; pp.103 - 105) It also makes it difficult to determine the focus of the development plan that the policies are endeavouring to deliver.
Mr Martin Kerr	1.2 dlp20 Support	Good plan. Public transport needs more support, including the rebuilding of the railway between Lynton and Barnstaple.
Mr Paul Trevena	1.2 dlp108 Support	The plan is excellent and should benefit all, including generations to come. The reinstatement of the narrow gauge railway (Lynton and Barnstaple Railway) is a very strong initiative. It has good potential to increase, tourism, employment and add value to the wider community. The park and ride scheme, should address some of the parking issues in the area and reduce the impact of additional visitors on the local community (the Swanage Railways park and ride scheme has been very successful).
Matt Towell	1.3 dlp208 Support	As a regular visitor to Exmoor (specifically the Lynton and Barnstaple railway) I greatly enjoy the countryside, walks and the wildlife. These are made even more accessible by the great work being carried out by the railway. The public transport the railway is looking to hold will serve to boost the local economy through tourism and through accessibility to jobs. Great work has been done so far, keep it up!
Mr Neil Legg	1.4 dlp198 Support	Support for the Lynton & Barnstaple railway could provide much needed work and income for local business. The recent success of the welsh highland railway which was completed in a relatively short time is an excellent example of what is possible.

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Mr Barney Simmons Somerset Rural Youth Project	1.8 dlp176 Support - subject to amendments	ENPA does and needs to continue to work hard for local people and communities. ENPA needs to pay particular attention to the needs of more vulnerable members of local communities - the young (forced to move away from the park due to expensive housing, poor transport and lack of opportunity and the old (increasingly isolated due to a decline in local services). ENPA does have a good record of supporting projects that benefit young people. This needs to continue.
Mike Highfield Somerset County Council	1.11 dlp245 General Comment	The Exmoor Plan has, in 1.11 identified that the National Planning Policy Framework has a presumption in favour of sustainable development. A planning proposal needs to demonstrate that sustainable criteria exist in three dimensions and a planning officer is instructed to consider all three. The requirement for acoustic consideration in planning falls under the 'environmental role' within which are the objectives of 'contributing to protecting and enhancing our natural, built and historic environment'. The ministerial foreword to the NPPF defined and extended the role of planning from one of scrutiny to one resulting in enhancement and improvement of surroundings as indicated by the statement 'Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives'. To assist in this there is now a requirement for applicants to seek early technical advice (192) and a need for LPAs to adopt proactive roles at pre-application (189, 190, 191) that help applicants solve problems (187). I consider the Exmoor Plan provides planning officers with opportunity to minimise the impact of some development at a pre-application stage (5.63, 5.111, 6.150, 6.175, 9.74, 10.56, 12.6) and stress the needs for more specific consideration of noise.
Mr Martin Wilsher West Somerset District Council	1.11 dlp807 Object	Wording of the text implies that the National Park, in the production of the Local Plan, is exempt from the provisions of the NPPF due to paragraph 14 and its footnote (Department for Communities and Local Government; National Planning Policy Framework- March 2012; Department for Communities and Local Government; 2012; ISBN 978 1 4098 3413 7; p.4) including its, 'presumption in favour of sustainable development'. The footnote referred to makes clear that it recognises the special status conferred on such places is used as an example only and relates to their application in the context of other policies contained within the NPPF. National Parks are only specifically referred to in policy terms within the NPPF in paragraph 115 (Department for Communities and Local Government; National Planning Policy Framework- March 2012; Department for Communities and Local Government; 2012; ISBN 978 1 4098 3413 7; pp.26-27) - in relation to the weight to be attributed to conserving landscape and scenic beauty and, paragraph 144 (Department for Communities and Local Government; National Planning Policy Framework- March 2012; Department for Communities

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		<p>and Local Government; 2012; ISBN 978 1 4098 3413 7; p.34.) - in relation to minerals planning applications. Whilst the former includes a reference footnote to the Defra Circular of 2010, (Department for the Environment Food and Rural Affairs; English National Parks and the Broads: UK Government Vision and Circular 2010- March 2010; Department for Environment Food and Rural Affairs; 2010;) this makes clear that it is only in relation to, 'the statutory purposes, management and other matters' but no mention of planning. As the NPPF post-dates the Defra Circular, it forms the latest Government statement in respect of policy and in particular planning policy. Paragraph 6 of the NPPF (Department for Communities and Local Government; National Planning Policy Framework- March 2012; op. cit.; p.2) makes it clear that the policy content of paras. 18 to 219 constitutes the Government's view of sustainable development and all relevant parts, with the exception of those specifically referred to above, apply to all LPA's including National Parks.</p>
Mr Marcus Capel Cutcombe and Timberscombe Schools	1.2 dlp21 Support	The "Your Future Exmoor" events were much appreciated by the schools and involved the children fully in thinking about their park.
Gary Parsons Sport England	1.24 dlp306 <b>Object</b>	<p>1. Local Plan &amp; Evidence Base Evidence base (to include sport and recreation) for Local Plan page 6 para 1.24-1.25 The National Planning Policy Framework (NPPF) published in March 2012 states: Paragraph 73- Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to health and well-being of communities. Planning policies should be based on up-to-date assessment of the needs for open space, sport and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required. Sport England's view is that, in order to meet the requirements of the National Planning Policy Framework (NPPF) (formerly PPS12 and PPG17), this should include a strategy (supply and demand analysis with qualitative issues included) covering the need for indoor and outdoor sports facilities, including playing pitches. A revised methodology for producing Playing Pitch Strategies (including artificial grass pitches) was published earlier this year. An up to date strategy will support effective planning policies for protection and creating new sites. There should also be a wider Sport Strategy including swimming pools, sports halls and other non playing pitch sports. Sport England will be working this year on producing a Technical Guide for Assessing Needs &amp; Opportunities regarding sport to accompany the NPPF. <a href="http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-">http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-</a></p>



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		guidance/ We raise concern that there does not appear to be a robust and up to date evidence base for sport and recreation in the Exmoor National Park.
<b>SECTION 2 – VISON, STRATEGIC PRIORITIES AND OBJECTIVES</b>		
Mr Martin Wilsher West Somerset District Council	2 dlp790 General Comment	- Section 2 expresses a vision for the Exmoor National Park in the context of the national vision, plus the objectives of the vision but not any reference to a strategy and how the development plan is expected to facilitate its delivery. The absence of a clear development plan strategy makes it difficult to identify the strategic issues both within and outside of the Exmoor National Park that may need addressing through the 'duty to co-operate' provisions established through Section 110 of the Localism Act. It also makes it difficult to determine the focus of the development plan that the policies are endeavouring to deliver.
Mr Martin Wilsher West Somerset District Council	2 dlp808 Object	Vision attempts to create an aspiration and image of a self-sustainable and self-contained entity. Whilst part 7 (p.8) makes passing reference to essential services and facilities being provided outside of the National Park, it seeks to promote access to these by means other than the private car. This is a wholly unrealistic aspiration given the nature of the terrain throughout the area, the limited road network within it, the limited prospects of accessing alternative modes of transport and, the high level of dependence on the private car as a means of transport for both residents and visitors alike. The text needs to be re-phrased to acknowledge the limited opportunities available for most residents and visitors to access services and facilities both within and outside of the National Park and, the need for the development plan policies to plan for access and use by the private car. A solution may be to make greater reference in the supporting text to greater integration and co-operation with neighbouring Local Authorities and Local Planning Authorities to make these services and facilities available and accessible to residents and visitors to the National Park in a sustainable context. Reference could also be made in the text to those items that would best be addressed due to their strategic cross-boundary significance through the provisions of 'Duty-to-Co-operate' (H.M. Government; Localism Act 2011, Chapter 20; op. cit.)
Mr Ross Simmonds English Heritage South West	2 dlp679 Support - subject to amendments	VISION FOR EXMOOR NATIONAL PARK TO 2030 English Heritage welcome the Vision for Exmoor. Particularly criteria 3 along with the supporting text. We advise that criteria 3 is amended to include the text 'features are conserved and enhanced'
Mrs Jill Jones	2 dlp424 General Comment	Objectives are commendable, but vague. How will anyone measure if objectives have been achieved without some quantitative and qualitative targets?

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
The Crown Estate	2 dlp770 Support	The Crown Estate remains generally supportive of the draft vision and objectives for Exmoor as set out in the consultation document. It is however important that all of the different elements are pursued in an integrated way.
Mr Barney Simmons Somerset Rural Youth Project	2.2 dlp181 General Comment	Continue to provide support to projects that build partnerships allow local communities to get to know, understand and want to protect the landscapes that make Exmoor special. ENPA has an excellent history of supporting these sort of projects. This should continue and remain a key objective in future years. These projects should be aimed at all sections of the local populations with particular focus on young people and children.
Mike Highfield Somerset County Council	2.3 dlp255 Support	Unfortunately neither the NPPF, or later explanatory information provide objective guidance on how to demonstrate if a development is a change for the better, or gives rise to what might be considered an acceptable environmental impact. The NPPF stipulates (10) that 'plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas'. I consider the Exmoor Plan has provided good opportunity to stress the importance of protecting tranquillity (2.3-1, 5.169, 6.91, CC-S3.f, CC-D4.d, 6.173, 9.7, 9.9, 9.10, RT-D4.2d, 9.78) and consider noise impact from development (CE-S8.h, CE-S9.2a, CE-D5.c, CC-D6.b, 6.157, 6.173, 6.175, 7.236, 8.42, 9.87).
Jill Demirtges Dunster Parish Council	2.3 dlp635 Support	The Dunster Parish Council broadly supports the stated objectives of the Exmoor National Park Local Plan. In turn the Dunster Parish Council asks that Exmoor National Park Authority support the community of Dunster in achieving their aims as set out in the Dunster Action Plan contained within Section 11.29 of the Draft Consultation Document.
Mr Ross Simmonds English Heritage South West	2.3 dlp680 Support	Objective 1, 2, 5, 15, 16. We support these Objectives.
<b>SECTION 3 – SPATIAL PORTRAIT</b>		
Mr Martin Wilsher West Somerset District Council	3 dlp791 General Comment	- Section 3 paints a spatial portrait of the National Park and briefly, in para.3.20, acknowledges the importance of larger settlements outside of it in terms of services and facilities but, with no indication as to how the development plan could encourage greater levels of integration. The absence of a clear development plan strategy makes it difficult to identify the strategic issues both within and outside of the Exmoor National Park that may need addressing through the 'duty to co-operate' provisions established through Section 110 of the Localism Act. It also

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
		makes it difficult to determine the focus of the development plan that the policies are endeavouring to deliver.
Mr Martin Wilsher West Somerset District Council	3.1 dlp810 General Comment	Absence of reference to the designation Order legislation that brought the Exmoor National Park (H.M. Government; National Parks and Access to the Countryside Act 1949: Exmoor National Park (Designation) Order 1954 (HLG 92/176); H.M.S.O.; 1956) into being.
Mr Bruce Nottrodt	3.11 dlp91 Support	Apart from the wider climatic considerations the reduction of energy needs will improve the resilience of the housing stock in the event of energy sources being disrupted, reduce risk of "fuel poverty" and reduce costs and effects of getting energy to the user. An example being reduction of need for oil tankers or upgrading of power lines.
Mr Marcus Capel Cutcombe and Timberscombe Schools	3.15 dlp22 General Comment	As a headteacher, I am very concerned about keeping a thriving, mixed age population. Supporting opportunities for employment and suitable housing is key to encouraging people to stay and work on the moor, which in turn supports local services. We need a varied demographic across the moor, the mixture of retired, working, young families and holiday homes providing a richer community, however it is a concern that we are losing people off the moor, with the number of houses with "no usual residents" increasing. Encouraging sustainable development and employment is key - this needs to make economic sense for the developers, so a limited amount of open market housing may be needed to make the development of affordable housing attractive.
Mr Martin Wilsher West Somerset District Council	3.15 dlp809 <b>Object</b>	Extensive use is made of Census 2011 data but no reference is provided as to the various sources such as Census Quick Statistic and Key Statistic tables (Office for National Statistics; Neighbourhood Statistics: Census 2011 (search facility)); Office for National Statistics; 2013. (web-page)). These are accessible through the Neighbourhood Statistics search facility on the Office for National Statistics (ONS) web-site.
Mr Bruce Nottrodt	3.18 dlp93 General Comment	Please confirm how the figure for the house price was arrived at. Was this based on estate agents asking prices or land registry data?
Mr Bruce Nottrodt	3.18 dlp94 General Comment	Please advise how house price figure was arrived at. Was this estate agents asking price or Land Registry data.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mr Neil Legg	3.26 dlp206 Support	Supporting the expansion of the L&B railway would undoubtedly enhance park tourism, attracting income all year round and providing an additional form of transport for visitors.
Hugh Thomas Greater Exmoor Shoots Association (GESA)	3.27 dlp327 <b>Object</b>	We note that our role (that of GESA) has been marginalised in the latest draft plan by comparison with its precursor. We would respectfully suggest that the growth of this sector of the Exmoor economy has been noticeably greater than in any other area, and that ours is entirely without public funding (distinguishing Game Shooting from farming or tourism in general). (Even in Exford, the economic contribution (inter alia to hotels and B&B) is significant by comparison with the popular concept of equestrian activity.) Some of the comments are grudging or lack an understanding of the advantages of game shooting to the National Park and the surrounding country.
Mrs Christine Fitzgerald Porlock Parish Council	3.30 dlp550 General Comment	In the preamble on achieving accessibility for all there is no mention of disabled access throughout. This does not just cover those in wheelchairs but also people with impaired mobility and also those with young children in buggies etc.
Revd Timothy Woods	3.34 dlp43 General Comment	In view of the possibility (as yet unproven) that bees may be affected by mobile phone signals, it may be prudent to allow an area of the Park to be protected against any enhancement of mobile signals, and to enable experiments to attempt to develop bee colonies. Designate an area or areas in which mobile signals would be reduced or avoided altogether.
Mr Martin Wilsher West Somerset District Council	3.35 dlp811 <b>Object</b>	Map 3.2 Key Diagram Unclear in a spatial context of how and where the larger settlements outside of the Exmoor National Park are and relate to the road network and settlements within it.
Mrs Pamela Scragg Old Cleeve Parish Council	3.35 dlp645 General Comment	Printed document should be printed in colour for clarity. Wording on a key 'special area of conservation (Exmoor & Quatocks oakwoods)' should be 'Quatocks'.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
<b>SECTION 4 – GENERAL POLICIES</b>		
Mr Martin Wilsher West Somerset District Council	4 dlp792 General Comment	Absence of a clearly defined development plan strategy for the Exmoor National Park. - Section 4 refers to a spatial strategy (paras.4.14- 4.40) but this is solely in the context of establishing a settlement hierarchy within the Local Plan area rather than how it fits with strategies in neighbouring Local Planning Authorities. The absence of a clear development plan strategy makes it difficult to identify the strategic issues both within and outside of the Exmoor National Park that may need addressing through the 'duty to co-operate' provisions established through Section 110 of the Localism Act. It also makes it difficult to determine the focus of the development plan that the policies are endeavouring to deliver.
Alan Morgan	4.3 dlp388 General Comment	General Policies: The purposes of The Park are plain to understand and succinctly explained but I feel that the aim of conserving and enhancing wildlife does not sit well with the policy of allowing the badger cull upon ENT [ENP] land. I agree that action has to be taken to eradicate the pernicious TB virus from cattle but I feel that capture and vaccinate would be a more fitting response by The Park. However I digress.
Mr Martin Wilsher West Somerset District Council	4.5 dlp812 <b>Object</b>	Text implies that the National Park legislation (H.M. Government; National Parks and Access to the Countryside Act 1949 (as amended); H.M.S.O.; 1949. H.M. Government; The Environment Act 1995, Chapter 25 (as amended); H.M.S.O.; 1995; ISBN 0 10 542595) and the status it confers extends beyond the National Park boundary. In the context of the extant planning legislation (H.M. Government; Town and Country Planning Act, Chapter 8 (as amended); H.M.S.O.; 1990; ISBN 0 10 540890 5), Local Planning Authorities (LPA's) can only prepare development plans for their own respective areas unless they agree to produce a joint local plan. Paragraph 153 of the NPPF confirms this. The legislation does not permit one LPA to plan inside a neighbour unless it is as part of a jointly prepared Local Plan under the provisions of Sections 28- 31 of the Planning and Compulsory purchase Act (H.M. Government; Planning and Compulsory Purchase Act 2004, Chapter 5 (as amended); The Stationary Office; 2004; ISBN 0 10 540504 3; pp.16 - 19) and associated Regulations. Any issues of a cross-LPA boundary nature need to be addressed by negotiation. Where these are deemed to be of a strategic nature, these should be addressed through the 'Duty to Co-operate' provisions of Section 110 of the Localism Act (H.M. Government; Localism Act 2011, Chapter 20; op. cit.) and associated regulations.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mr Martin Wilsher West Somerset District Council	4.8 dlp813 General Comment	The paragraph repeats the three sustainable development roles of the NPPF without stating or elaborating on how these are proposed to be applied within the National Park.
Dr Duncan Jeffray Exmoor Society	GP1 dlp415 Support - subject to amendments	<p>The Society accepts that this must be the first and overarching general policy.</p> <p>But we would like to see a closer link made in GP1 to paragraph 1. 11 (page 2) of the document which draws attention to the National Planning Policy Framework (NPPF). The NPPF states that Local Plans should meet objectively assessed needs unless specific policies in the NPPF indicate development should be restricted, and gives examples including National Parks. The Society feels that a stronger link would help to ensure an understanding, by the public, that many restrictions to development are not generated by the National Park itself, but are indeed required by the NPPF. It is felt that this is necessary, as the tone of all subsequent policies dictated by GP2: PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT is likely to lead to a belief that the National Park is only paying lip service to GP2, while setting up all sorts of restrictions to restrict development.</p>
Mr Martin Wilsher West Somerset District Council	GP1 dlp814 <b>Object</b>	Policy wording is far too prescriptive for an over-arching general policy. Much of the policy-wording is aspirational in content would be better located as part of an explanation or justification in the supporting text to the policy. Policy contains refers to the National Park's statutory purpose and duty within it. This is un-necessary as the legal status will always have precedence over development plan policy.
Mr Ross Simmonds English Heritage South West	GP1 dlp681 Support	We welcome GP1 and the clear identification and role of the historic environment in the policy.
Mr Andrew Austen North Devon Council	GP1 dlp845 Support	Important for NDC to ensure that new development outside the ENPA that could potentially affect the National Park's setting does not conflict with the vision and objectives.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mrs Jill Jones	GP1 dlp425 General Comment	<p>Policy GP1, 2 particularly b) &amp; k): In order to safeguard the sustainability and resilience of communities and strengthen services and facilities I think it is important to ensure there is owner occupier housing available for middle income households. These households make significant economic contribution to a community and help to safeguard local services. It is possible the lack of houses to purchase by those who can afford them has contributed to the decline in the overall population. As it seems to be impossible to stop the loss of available housing to the 'second home' market I think the balance should be partially redressed by replacing some of this loss with owner occupier housing but with a principal residency restriction. I doubt if this can be met with conversion / change of use of existing buildings.</p> <p>Policy GP1, 2 c) General comment 'which, where appropriate, enables the use of sustainable transport.' Using the term 'where appropriate' is meaningless unless stating what is and is not appropriate. 'Where possible' would make more sense.</p>
Mr James Wilmoth	GP1 dlp672 General Comment	<p>More incentive should be given to replace poor quality buildings or those in poor condition with new and more sustainable buildings. The use of good design and good quality materials should be encouraged. As an example, a pre-war bungalow at odds with the vernacular styling would be better replaced rather than continually repairing it.</p>

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
The Crown Estate	GP1 dlp772 Support - subject to amendments	<p>The Crown Estate is generally supportive of Policy GP1 which sets out the overarching approach to be taken in achieving the purposes of the National Park and sustainable development.</p> <p>However, it is important to highlight that the National Planning Policy Framework (the Framework) states the purpose of the planning system is 'to contribute to the achievement of sustainable development', and that this has three roles: 'economic, social and environmental'. It goes on to say that these 'are mutually dependent. Economic growth can ensure higher social and environmental standards, and well-designed buildings and places can improve the lives of people and communities. Therefore, to achieve sustainable development, economic, social and environmental gains should be sought jointly through the planning system.' TCE feels, therefore, that the Local Plan should ensure a balance is struck to both meet the overall purposes of the National Park (conserve and enhance the natural beauty, wildlife and cultural heritage) and meeting the Park Authority's duty of fostering the economic and social well-being of local communities. 'Sustainability' should encompass communities, and the people and businesses that make up the working, living landscape; ensure that these continue to prosper and not leave them to the fate of many other rural communities and allow them to slip into decline. After all, the quality of the built and natural environment is inextricably linked to the success of those people, businesses and other organisations which are responsible for its ongoing management.</p>
Mr Barney Simmons Somerset Rural Youth Project	GP2 dlp177 Support	
Mr Martin Wilsher West Somerset District Council	GP2 dlp815 <b>Object</b>	Policy implies that the National Park Authority is the only decision-making body in respect of use of the Local Plan. However, other individuals and organisations can make planning determinations using the Local Plan policies including; the Planning Inspectorate, Secretary of State and, the Courts. Wording of policy needs re-phrasing to make it more generic in this respect.
Mr Martin Wilsher West Somerset District Council	GP2 dlp816 <b>Object</b>	Policy refers specifically to the application of the NPPF. This is un-necessary in the text of the policy itself as the Local Plan and its policies have to reflect and be consistent with the guidance provided on sustainable development in the relevant paragraphs (18- 219) in the NPPF (Department for Communities and Local Government; National Planning Policy Framework- March 2012; op. cit.; pp.6 - 49). This information would be better located in the supporting text to the policy.



Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Gary Parsons Sport England	GP2 dlp308 Support - subject to amendments	<p>3. Protection of Sport &amp; Recreation including playing fields Policy GP2- Presumption of Sustainable Development page 37 para 4.11 Policy HC-D17 Safeguarding Local Service &amp; Community Facilities pages 271/275 para 7.211-7.220 Sport England acknowledges that the NPPF is promoting 'sustainable development' to avoid delays in the planning process (linked to economic growth). That said, the NPPF also says that for open space, sport &amp; recreation land &amp; buildings (including playing fields) paragraph 74: Paragraph 74. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: - an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or - the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or - the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss. Sport England would be very concerned if any existing playing pitches would be affected by these proposals without adequate replacement in terms of quality, quantity, accessibility, management &amp; maintenance and prior to the loss of the existing facility. Sport England's Playing Field Policy 'Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of, all or any part of a playing field, or land last used as a playing field or allocated for use as a playing field in an adopted or draft deposit local plan, unless, in the judgement of Sport England, one of the specific circumstances applies.' Reason: Development which would lead to the loss of all or part of a playing field, or which would prejudice its use, should not normally be permitted because it would permanently reduce the opportunities for participation in sporting activities. Government planning policy and the policies of Sport England have recognised the importance of such activities to the social and economic well-being of the country. Sport England opposes such developments in all but exceptional cases, whether the land is in public, private or educational use. It is our policy to oppose development on playing fields unless at least one of the five exceptions as set out in our policy are met:</p> <p>E1 'A carefully quantified and documented assessment of current and future needs has demonstrated to the satisfaction of Sport England that there is an excess of playing field provision in the catchment, and the site has no special significance to the interests of sport.'</p> <p>E2 'The proposed development is ancillary to the principal use of the site as a playing field or playing fields, and does not affect the quantity or quality of pitches or adversely affect their use.'</p> <p>E3 'The proposed development affects only land incapable of forming, or forming part of, a playing pitch, and does not result in the loss of, or inability to make use of any playing pitch</p>

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
		<p>(including the maintenance of adequate safety margins), a reduction in the size of the playing area of any playing pitch or the loss of any other sporting/ancillary facility on the site.'</p> <p>E4 'The playing field or playing fields which would be lost as a result of the proposed development would be replaced by a playing field or playing fields of an equivalent or better quality and of equivalent or greater quantity, in a suitable location and subject to equivalent or better management arrangements, prior to the commencement of the development.'</p> <p>E5 'The proposed development is for an indoor or outdoor sports facility, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss of the playing field or playing fields.'</p> <p>Amendment: The Exmoor National Park Local Plan should reflect National Planning Policy regarding protecting sport facilities for indoor and outdoor sport.</p>
Mark Funnell National Trust	4.12 dlp577 <b>Object</b>	<p>In relation to paragraph 4.12- the Trust is unconvinced that there is no need to provide a clearer definition of 'major development' in the National Park, particularly in relation to housing. It has been clear from appeal decisions, subsequent to the NPPF coming into force, that there is a lack of clarity over the definition of 'major development' in the context of paragraph 116 of the NPPF. In a recent appeal case in relation to Old Kiln Quarry in Berkshire (Appeal Ref APP/W0340/A/12/2173977), with regard to paragraph 116 of the NPPF, the Inspector cites extant planning legislation for a definition of 'major development' (paragraph 100), and the definition provided by Statutory Instrument 2010 No.2184- The Town and Country Planning (Development Management Procedure) (England) Order 2010. The Trust suggests that anything falling within the definition of major development in Statutory Instrument 2010 No.2184- The Town and Country Planning (Development Management Procedure) (England) Order 2010, be considered major but that the National Park make clear it retains the discretion to determine whether development of a lesser scale might also be deemed 'major' on a case by case basis - having regard to the impact on the National Park and its special qualities.</p>
Alan Morgan	GP3 dlp389 Support	<p>The preclusion of major developments except in the event of exceptional national interest is to be applauded.</p>

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mr Martin Wilsher West Somerset District Council	GP3 dlp817 <b>Object</b>	Policy implies that the National Park Authority is the only decision-making body in respect of use of the Local Plan. However, other individuals and organisations can make planning determinations using the Local Plan policies including; the Planning Inspectorate, Secretary of State and, the Courts. Wording of policy needs re-phrasing to make it more generic in this respect.
Mr Martin Wilsher West Somerset District Council	GP3 dlp818 <b>Object</b>	The text of the second part of the policy is more descriptive in content and would be better located in the supporting text to the policy itself.
Mr Ross Simmonds English Heritage South West	GP3 dlp682 Support - subject to amendments	Criterion f appears to give additional weight to the natural environment it would be more equitable to the aims of achieving sustainable development if similar weight were given to the historic environment, as harm to the historic environment should be avoided.
Mr Andrew Austen North Devon Council	GP3 dlp846 Support	Major development outside of the ENPA that could potentially affect the National Park's setting must not conflict with the vision and objectives.
Mr Martin Wilsher West Somerset District Council	4.14, 4.15, 4.16, 4.17, dlp819, dlp820, dlp821, dlp822 <b>Object</b>	Absence of reference to any economic criteria and justification informing the choice of settlements within the settlement hierarchy (paras.4.35- 4.40). Reference is made community and social well-being of Exmoor's settlements but not the economic. Mention is made of the provision of key services and facilities by settlements outside of the National Park (para. 4.20) but no reference to how Exmoor residents make use of these and how these external locations relate, in role and function terms, to settlements within it.
Mr Mark Blathwayt	4.18 dlp38 Support	I am pleased to see that Option C has been favoured and strongly support this choice of development allocation as it spreads the benefits most widely and includes the communities of Porlock Weir and West Porlock. However the subsequent policies for Porlock Weir do not follow this through especially in relation to affordable housing. See subsequent comments

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mr Martin Wilsher West Somerset District Council	4.18, 4.19, 4.20, 4.21, 4.22 dlp823, dlp824, dlp825, dlp826, dlp827 <b>Object</b>	Absence of reference to any economic criteria and justification informing the choice of settlements within the settlement hierarchy (paras.4.35- 4.40). Reference is made community and social well-being of Exmoor's settlements but not the economic. Mention is made of the provision of key services and facilities by settlements outside of the National Park (para. 4.20) but no reference to how Exmoor residents make use of these and how these external locations relate, in role and function terms, to settlements within it.
Mr Mark Blathwayt	4.23 dlp39 General Comment	The need for affordable housing at Porlock Weir exists because the settlement provides employment and services to both the local community and visiting public. The provision of such housing is vital for the community and reduces travel between Porlock and Porlock Weir by those employed at the Weir
Mr Martin Wilsher West Somerset District Council	4.23 – 4.31 dlp828 – dlp836 <b>Object</b>	Absence of reference to any economic criteria and justification informing the choice of settlements within the settlement hierarchy (paras.4.35- 4.40). Reference is made community and social well-being of Exmoor's settlements but not the economic. Mention is made of the provision of key services and facilities by settlements outside of the National Park (para. 4.20) but no reference to how Exmoor residents make use of these and how these external locations relate, in role and function terms, to settlements within it.

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Mrs Pamela Scragg Old Cleeve Parish Council	4.31 dlp650 General Comment	<p>There is a need to make consistently clear throughout this Local Plan that the 'capacity' for development identified in the Landscape Sensitivity Study is 'landscape capacity' only, as the study itself makes explicit. Although this is clear in some paragraphs, in others it is not, especially where reference is made to 'overall capacity'. A solution for the present paragraph would be to insert 'in landscape terms' after 'each settlement'. Thereafter, it would be helpful to make consistent use of the term 'landscape capacity' rather than just 'capacity' when referring to this study (see paragraphs 5.18, 5.146, 5.148, notes 273 and 309, paragraphs 7.85, 11.224, and table 11.2, including main heading). NB reference in note 57 has the wrong date and reference in note 146 has the wrong title and date.</p>
Mr Martin Wilsher West Somerset District Council	4.32, 4.33, 4.34 dlp837, dlp838, dlp839 <b>Object</b>	<p>Absence of reference to any economic criteria and justification informing the choice of settlements within the settlement hierarchy (paras.4.35- 4.40). Reference is made community and social well-being of Exmoor's settlements but not the economic. Mention is made of the provision of key services and facilities by settlements outside of the National Park (para. 4.20) but no reference to how Exmoor residents make use of these and how these external locations relate, in role and function terms, to settlements within it.</p>
Mrs Marilyn Crothers Nettlecombe Parish Council	4.35 dlp383 General Comment	<p>GP4 4.35-4.39 What will ENP do if a village or settlement cannot retain the elements which classify it? i.e. would a settlement become Rural Community? Or a Rural Community become open countryside if it lost its services?</p>
Mr Martin Wilsher West Somerset District Council	4.35 dlp881 <b>Object</b>	<p>Compared with the settlement hierarchy in the adopted Local Plan for the National Park, the village of Dunster appears to have been elevated in status to that of a Local Service Centre, alongside the settlements of, Dulverton, Lynton &amp; Lynmouth and, Porlock. No justification is provided for this in the accompanying text. This raises a number of issues with respect to the older part of the settlement and, how it relates to the surrounding area in terms of the role and function it provides to these residents. - Whilst Dunster is one of the larger Parishes within the National Park in terms of population when compared with most of the other settlements,</p>

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
		<p>the figure is significantly reduced when the proportion of the residents living outside of the Exmoor National Park, particularly those living in the area known as Dunster Marsh, are excluded. Approximately 40% of the dwelling stock of the Parish is estimated to be outside of the National Park. This would reduce the number within it from 592 [20 Office for National Statistics; Neighbourhood Statistics- Dunster (Parish): Census 2011- Dwellings, Household Spaces and Accommodation, 2011 (Table KS401EW); Office for National Statistics; 2013 (data-set).] dwelling units for the whole Parish to 356 [21 West Somerset Council; WSC LPA Parish Census Data 2011, 2012 Dwelling Stock and, 2032 Projections; West Somerset Council; 2014.] within the National Park. The proportionate reductions in population would be from 817 [22 Office for National Statistics; Neighbourhood Statistics- Dunster (Parish): Census 2011- Dwellings, Household Spaces and Accommodation, 2011 (Table KS401EW); op. cit.] residents to c.490 [23 West Somerset Council; WSC LPA Parish Census Data 2011, 2012 Dwelling Stock and, 2032 Projections; op. cit.]. In addition to this the Census data for Dunster Parish reveals that over 30% of the dwelling stock was not permanently occupied, reducing the total occupied stock to 412 [24 Office for National Statistics; Neighbourhood Statistics- Dunster (Parish): Census 2011- Dwellings, Household Spaces and Accommodation, 2011 (Table KS401EW); op. cit]. The unoccupied stock being comprised of vacant properties, holiday homes and 2nd homes. - Whilst the older part of Dunster village within the Exmoor National Park provides a number and range of social and community facilities that are found in the existing three Local Rural Centres [25 Exmoor National Park Authority; Exmoor National Park Local Plan (Including Minerals and Waste Policies) 2001- 2011)- Adopted 2005: Written Statement; op. cit.; pp.148- 196], the economic provision represented by retail and retail-related activities within the village, collectively, do not function in the same way as that provided in Dulverton, Lynton &amp; Lynmouth and, Porlock. These last three contain retail activities which specifically aim to cater for the basic economic needs of their respective local communities and the surrounding area as well as the visiting tourist community. The retail offer in Dunster village is primarily orientated at the visitor community rather than the local, resident, catchment community. These latter users are, therefore reliant for essential day-to-day needs on the services and facilities provided outside of the settlement/Parish, primarily in Minehead. - Implicit in the first sentence of the definition of a 'Local Service Centre' is the expectation that such settlements are expected to be the focus of future development within the National Park. However, the Landscape Sensitivity Study that forms part of the evidence-base informing the strategy and policies in the Local Plan [26 Paul Bryan- Landscape Planning; Landscape Sensitivity Study - Exmoor National Park Authority 2013: Dunster; Exmoor National Park Authority; 2013], suggests that the overall development potential of the part of Dunster village</p>

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
		<p>within the National Park, in landscape terms, is only an additional 22 new dwelling units. If correct, this could seriously inhibit the ability of the older part of the village to evolve and develop to meet the economic and social needs of the resident and surrounding communities in the way envisaged through its new status. Of concern to West Somerset Council as the Local Planning Authority (LPA) for those parts of the district outside of the National Park are the strategic and spatial consequences of this changed status for Dunster village within Exmoor. By elevating the settlement's status in this way, it is unlikely to alter the population of the village and surrounding communities within the National Park reliance on services and facilities, particularly economic, provided outside, primarily at Minehead. This could result in continuing and increasing traffic movements to and from Minehead, especially by the private car which would be contrary to trying to encourage more sustainable patterns of activity by local residents in and around Dunster. There is also the danger that where there is a need to rationalise social and community service provision for economic efficiency reasons, the facilities in Dunster are more likely to be vulnerable to closure than those in its larger neighbour. The outcome of this would be an increase in dependence by the local population on Minehead with the increased use of the private car in order to access the necessary services and facilities. Evidence of this can be found elsewhere in the National Park with the rationalisation of availability and accessibility to services provided by the Post Office in recent years. Also of concern to West Somerset Council, would be the consequential impact of the limited capacity of land and property in the older part of the village on that part of the Parish outside of the National Park, particularly at Dunster Marsh. This latter location is an area of residential development to the north of the main part of Dunster village. It is physically separated from the latter by the busy A.39 road and accessibility between the two is restricted to one narrow pedestrian underpass. There are no social and community facilities within the Dunster Marsh built-up area and the residents are heavily dependent on Minehead for access to most of these. The upgrading of Dunster to a Local Service Centre and, the absence of development opportunities within the older part of the village could put pressure for further larger-scale residential development at Dunster Marsh. This would be both undesirable and contrary to the sustainable development principles being pursued through the emerging West Somerset Local Plan [27 West Somerset Council; The West Somerset Local Plan to 2032 Revised Draft Preferred Strategy- June 2013; West Somerset Council; 2013] which seeks to focus the bulk of future development in the West Somerset LPA area within and immediately adjoining the three larger settlements of Minehead, Watchet and Williton. Dunster Marsh is identified as a settlement in the emerging Local Plan where development would only be permitted where there is a clearly identified 'local need'.</p>

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		<p>It is suggested that if, because of the range of extant social and community services on offer the role and function of the settlement is deemed to be significantly different (and clearly justified) to that of those identified as 'Villages' in Table 4.1, it should be placed in a category of its own in a similar way as provision has been made for Porlock Weir. The spatial and strategic implications of the upgrading proposal in either form are a cross-boundary (LPA) issue that should be dealt with as part of the 'Duty-to-Co-operate' requirements of the Localism Act [H.M. Government; Localism Act 2011, Chapter 20; op. cit.] legislation affecting the production of development plans. This has not happened to date on this matter and needs to be addressed.</p>
<p>Mr Martin Wilsher West Somerset District Council</p>	<p>4.35 dlp882 <b>Object</b></p>	<p>The town of Dulverton is identified as a Local Service Centre in Table 4.1 but the definition only refers to the impact and influence on communities within the National Park. Dulverton is located close to the southern edge of the Exmoor National Park and is used by residents of communities outside of the National Park for the essential day-to-day economic, social and, community services and facilities it provides. This is particularly true of the village of Brushford and hamlet of Battleton to the south of the town.</p> <p>The text of the Local Plan should acknowledge and reflect the influence of Dulverton on the surrounding communities both within and outside of the LPA area, and how this will be addressed in the future so as to encourage sustainable patterns of living amongst the local residents. The spatial and strategic implications of the influence of the settlement are a cross-boundary (LPA) issue that should be dealt with as part of the 'Duty-to-Co-operate' requirements of the Localism Act [35 H.M. Government; Localism Act 2011, Chapter 20; op. cit] legislation affecting the production of development plans. This has not happened to date on this matter and needs to be addressed.</p>
<p>Mr Martin Wilsher West Somerset District Council</p>	<p>4.35 dlp840 <b>Object</b></p>	<p>Text provides basic definitions of the different types of settlements in the 'settlement-hierarchy' but gives no indication of the criteria by which settlements are judged in terms of scale or, role and function.</p>
<p>Mr Martin Wilsher West Somerset District Council</p>	<p>4.36 dlp883 <b>Object</b></p>	<p>The settlement of Monksilver straddles two LPA areas with the 'main' road (B.3188) forming the boundary between the two based on the nap accompanying the Designation Order [29 H.M. Government; National Parks and Access to the Countryside Act 1949: Exmoor National Park (Designation) Order 1954 (HLG 92/176); op. cit.]. It is identified in Table 4.1 of the Local Plan as a Village. The text provides basic definitions of the different types of settlements in the 'settlement-hierarchy' but gives no indication of the criteria by which settlements are judged in</p>



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		<p>terms of scale or, role and function. The definition of a Village in paragraph 4.36 suggests that such settlements contain a number of services and facilities and that because of this some development in such locations would be desirable to maintain or enhance their communities. In the adopted West Somerset Local Plan [30 West Somerset District Council; West Somerset District Local Plan- Adopted, April 2006; West Somerset Council; 2008], the settlement is identified as a 'Small Village'. Policy SP/4 of that plan, residential development is restricted to affordable housing that meets a recognised and identified on-going need. In the latest iteration of the emerging West Somerset Local Plan, the village is not identified as a location for development activity in Policy SC1. The change in status is primarily due to the lack of historical development pressure for that part of the village outside of the National Park. Whilst it is acknowledged that the village as a whole does have some social and community facilities, the only economic facility is a pub/restaurant whose focus is more orientated to the visitor community. Accessibility to the village is restricted to the one road which is narrow in many places and does not benefit from regular daily bus service. As such residents will be dependent on the private car in order to access most services and facilities and any additional development would conflict with sustainable development principles which seek to reduce reliance on the private car as a mode of transport.</p> <p>The spatial and strategic implications of the differences in development plan definitions for the two parts of the settlement are a cross-boundary (LPA) issue that should be dealt with as part of the 'Duty-to-Co-operate' requirements of the Localism Act [H.M. Government; Localism Act 2011, Chapter 20; op. cit] legislation affecting the production of development plans. This has not happened to date on this matter and needs to be addressed.</p>
Mr Martin Wilsher West Somerset District Council	4.36 dlp841 <b>Object</b>	Text provides basic definitions of the different types of settlements in the 'settlement-hierarchy' but gives no indication of the criteria by which settlements are judged in terms of scale or, role and function.
Brig. David Godsall Winsford Parish Council	4.36 dlp620 General Comment	The category of "Village" in the Settlement Hierarchy could perhaps be further sub-divided. Those villages without a school face very different challenges in terms of demography, employment and housing need to those which have one. Further loss of a village shop would exacerbate those challenges.

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Mr Martin Wilsher West Somerset District Council	4.37 dlp884 <b>Object</b>	<p>The settlement of Withycombe straddles two LPA areas with the majority of the settlement being located outside of the Exmoor National Park [32 Stuart Todd Partnership; West Somerset Local Planning Authority Area Town and Village Centres Study- November 2011; West Somerset Council; 2012; pp. 66- 67]. The study of towns and villages outside of the National Park identified Withycombe as a settlement with no shop but some community facilities, in this case a village hall. Whilst the settlement benefits from the existence of a significant local employer, who is located within the National Park, the residents of the whole of the village are dependent for most economic and social services and facilities on travelling to settlements elsewhere, particularly, Carhampton and Minehead. Given the absence of most services and facilities in the whole of the village, the Local Plan seeks to designate small part of the village as a location where affordable residential development would be deemed acceptable. Within the West Somerset Local Plan [33 West Somerset District Council; West Somerset District Local Plan- Adopted, April 2006; op. cit.], the settlement is currently identified as a 'Small Village'. Policy SP/4 of that plan, residential development is restricted to affordable housing that meets a recognised and identified on-going need. However, in the latest iteration of the emerging West Somerset Local Plan, the village is not identified as a location for development activity in Policy SC1. The change in status is primarily due to the lack of historical development pressure for that part of the village, which is most of it, outside of the National Park. Accessibility to the village is restricted to a few C-Class County roads which are narrow in many places and the nearest bus stop is about one kilometre from the village. Due to this most residents will be dependent on the private car in order to access most services and facilities and any additional development would conflict with sustainable development principles which seek to reduce reliance on the private car as a mode of transport.</p> <p>There may be spatial and strategic implications of the differences in development plan definitions for the two parts of the settlement. These could be a cross-boundary (LPA) issue that would best be dealt with as part of the 'Duty-to-Co-operate' requirements of the Localism Act [34 H.M. Government; Localism Act 2011, Chapter 20; op. cit] legislation affecting the production of development plans. This has not happened to date on this matter and needs to be addressed.</p>
Mr Martin Wilsher West Somerset District Council	4.37 dlp842 <b>Object</b>	Text provides basic definitions of the different types of settlements in the 'settlement-hierarchy' but gives no indication of the criteria by which settlements are judged in terms of scale or, role and function.
Mr Mark Blathwayt	4.38 dlp40	This paragraph is a most unsatisfactory outcome for Porlock Weir. In the view of The Porlock Manor Estate the coastal issues rightly highlighted in the Local Plan make the provision of

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	<b>Object</b>	<p>affordable housing for this community more not less important. As drafted, the village status that has been felt appropriate for Porlock Weir is denied to the settlement and instead a CCMA is to be prepared which will focus almost totally on replacing lost housing and facilities. In this way the prospect of Affordable Housing for the Porlock Weir community seems to be lost.</p> <p>It would be more logical, having recognised the status of this settlement, to accord it the status of Village, but to then make the proposed provisions for the completion of a CCMA so as to ensure that a comprehensive development proposal is produced for Porlock Weir which looks at the needs of the community and allows both for replacement facilities and the development of the community. The Porlock Manor Estate has made the case for Affordable Housing in this community repeatedly for many years and it is essential that this Local Plan recognises that this settlement still has this same need regardless of the effects of coastal change, which just means that providing for those needs will require special consideration.</p>
Mr Mark Blathwayt	4.38 dlp42 General Comment	The list of facilities at Porlock Weir omits any mention of the settlement's defining asset which is the harbour. This facility creates jobs and is an asset which deserves recognition as economically important to the immediate area. It also contributes to the need for Affordable Housing in this settlement.
Mrs Christine Fitzgerald Porlock Parish Council	4.38 dlp551 Support	The Council very much welcomes the inclusion of Porlock Weir as a 'Village' in Option C and is totally in favour of its development as a social centre. Any development should be concentrated on higher ground at Lane Head and we note that the landowner is in favour of this.
Mr Martin Wilsher West Somerset District Council	4.38, 4.39, 4.40 dlp878, dlp879, dlp880 <b>Object</b>	Text provides basic definitions of the different types of settlements in the 'settlement-hierarchy' but gives no indication of the criteria by which settlements are judged in terms of scale or, role and function.
Mrs Marilyn Crothers Nettlecombe Parish Council	GP4 dlp382 General Comment	GP4 4.35-4.39 What will ENP do if a village or settlement cannot retain the elements which classify it? i.e. would a settlement become Rural Community? Or a Rural Community become open countryside if it lost its services?
Alan Morgan	GP4 dlp390 General Comment	The spatial strategy is very sensible and well-constructed and I have no wish to suggest changes in its contents or direction in any way.

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Dr Duncan Jeffray Exmoor Society	GP4 dlp416 Support	The Society strongly supports this policy and the inclusion of Rural Communities in the Settlement Hierarchy (table 4.1). It is the Society's view that allowing some small-scale affordable housing development in these rural communities is important for the long-term future of the Park. This will produce a situation different from that found in West Somerset and Devon, where such small communities will not be allowed any development. This will be concentrated in the larger Local Service Centres. This should help to counter a commonly held, but erroneous view, that housing development is not allowed in the National Park. We believe that confining building, in these Rural Communities, to the provision of local need affordable housing with no cross subsidy is sound.
Mrs Christine Fitzgerald Porlock Parish Council	GP4 dlp552 General Comment	Spatial Strategy Statement No 2(i) - Brownfield Sites. Although we agree with this policy there are very few sites of this nature left on Exmoor and virtually none in Porlock. This policy could impact the development of a community if no sites are available.
Mr Andrew Austen North Devon Council	GP4 dlp847 Support - subject to amendments	Subject to clarification of Point 4 relating to new build proposals within the open countryside being criteria based to clarify the sustainability requirements.
Peter Warren	GP4 dlp329 <b>Object</b>	Having already attended consultative meetings at Parracombe which were very interesting and informative and having read the draft local plan. May I ask you to include the Lester point area, at the western edge of the Exmoor national park, as a settlement within your local plan? I request this as the area is adjoining Combe Martin and should be treated, not as an isolated area within Exmoor, but as part of the village. Combe Martin has all the required amenities that your plan suggest are a prerequisite of a settlement. Because of its unique position adjacent to the E.N.P.it should have considerable impact on the local plan and not be ignored in it. Previous local plans have not succeeded in this area in the promotion of smaller or affordable housing but only the enlargement of existing housing. Lester point as part of the national park has 13 houses, the last new build being in 1966. Having lived here since 1980 {previously 37 years in Combe Martin village and born in Lynton in 1943} no housing has been built in the period I have lived in Lester point but 2 houses have been rebuilt to much larger proportions. 3 have been increased in size by at least 50% 5 have had significant additions/visual alterations. There has been provision in the present plan for such permissions. As direct result of previous plan's policies the exact opposite to the declared aims of the E.N.P have taken place, which suggests that the plans objectives are not being achieved. It seems that a house can be enlarged to allow for caring family members, but not a smaller additional dwelling, leaving historically ever increasing housing sizes and an ideal opportunity for holiday/

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		second homes to flourish. Eventually resulting in the loss of local amenities, services and visual impact due to the lack of residential occupancy. This type of occupation is most noticeable in this area where 4 of the 5 such properties, again out of only 13, already show dilapidation or unkempt signs. These properties will have a huge impact on the look of the E.N.P. if action is not taken to stop with imaginary and forward thinking policies for which the local plan is the ideal vehicle. Combe Martin has a huge number of holiday/second homes (no 3 in the country according to The Times) which is not a good starting position. Within feet of the E.N.P. and less than 100 meters from my house, a plot has planning permission for a massive house, this plot which is within the N.D.D.C. area, showing the anomalies that can occur when enlargement are fine but new build are not allowed! May I again ask for action by the E.N.P. in this matter in the form of positive actions and policies as suggested above?
Mark Funnell National Trust	GP4 dlp578 Support	Table 4.1 / Policy GP4: The National Trust supports the designation of Dunster as a Local Service Centre.
Mrs Heather Crockford West Somerset District Council	GP4 dlp591 <b>Object</b>	The appropriateness of including Dunster as a Local Service Centre on a par with Dulverton, Porlock and Lynton & Lynmouth is questioned, given the explicitly tourist related retail function of the village, which does not serve its own community, and the very limited opportunities for development within the historic settlement. The change of status is likely to encourage the provision of strategic housing growth at Dunster Marsh contrary to the proposals of the West Somerset Local Plan.
Mrs Heather Crockford West Somerset District Council	GP4 dlp592 General Comment	It is important to ensure that the two Planning Authority Area's Plans complement each other insofar as is possible in order to best meet the needs of communities- particularly where there are cases of split Parishes and most particularly at split settlements. The fulfilment of the Duty to Co-operate is key to this matter.
Mrs Pamela Scragg Old Cleeve Parish Council	GP4 dlp647 General Comment	Table 4.1 Settlement hierarchy. Page 31 Simonsbath, perhaps should be considered a rural community rather than a 'village'. Its remote location and lack of fundamental services, water supply, drainage and power capacity will limit sustainability (Policies CC D6 & CC S5). Limited development in both 'villages' and 'rural community remain very much the same in terms of criteria.
Mrs Pamela Scragg Old Cleeve Parish Council	GP4 dlp649 General Comment	Policy GP4.5 Re 'no development boundaries will be drawn for settlements'. The Landscape Sensitivity Study (2012), your only cited source of data relating to capacity for development, contains maps with clearly categorised zones and boundaries.

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Mr James Wilmoth	GP4 dlp671 Support	Dispensing with settlement boundaries and the adoption of the settlement hierarchy is sensible.
South West HARP Planning Consortium	GP4 dlp752 Support - subject to amendments	<p>We note and support the decision to expand the list of settlements included in the settlement hierarchy, including moving Dunster from the Villages to the Local Service Centres category and adding some Rural Communities hitherto excluded from the list in the adopted Local Plan. We agree that this will expand opportunities for housing development in accordance with GB4 and related policies. However, we are concerned that this could be negated by some of the policy criteria which, as drafted, are ambiguous and could lead to planning applications being determined in an overly cautious manner.</p> <p>In particular, we would like the Council to address both criteria for assessing development proposals under Part 2 of this policy: i. 'Brownfield sites with a low environmental value that are well related to existing buildings in the defined settlements (Table 1)' in terms of how low environmental value will be assessed - using what parameters and/or scale? ii. 'The re-use of existing buildings associated with an established building group across the National Park (CE-S5 and CE-S6)' - what is a building group? CE-S5 and CE-S6 do not provide satisfactory explanation while the supporting paragraph 4.39 makes some references to groups of buildings in hamlets but this really is not clear. Also in this vein, the final sentence of Part 5 needs attention: 'Where the capacity of a settlement to accommodate a particular development is in doubt then it should be demonstrated that alternative options have been considered to accommodate the level of development that may be permitted'. The Council should define how capacity is intended to be assessed (by whom and using what criteria?) and what it means by 'may be permitted' as all of this is very unclear. More generally, our above comments show that the policy is unnecessarily complicated. It contains a large number of sections, sub-sections and criteria which in turn refer to tables and policies in other parts of the draft Local Plan. We urge the Council to consider a more succinct and user-friendly presentation of the information; for example by moving the National-Park wide elements in Part 3 to a separate policy. We comment on the detailed housing policies below. However we note the different terminology for affordable housing within GP4 Part 5 and query whether this is in error, or the Council really is seeking different types in each category of the settlement hierarchy (in which case this must be clarified through more careful and considered wording). In respect of the Local Service Centres (5a) and Rural Communities (5c) 'local need affordable housing' is stated as being acceptable, whereas in the Village (5b) this is merely referred to as 'affordable housing'.</p>

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The Crown Estate	GP4 dlp236 Support - subject to amendments	<p>Whilst TCE is understanding of the need to have an over-arching spatial strategy for the National Park and are generally supportive of its aims, it is concerned that some elements are too restrictive.</p> <p>The development allowed within certain settlements is particularly restrictive- only allowing new build housing schemes within rural communities where it wholly satisfies local need affordable housing, and not permitting cross subsidy from 'principal housing' or 'specialist housing'. This policy does not accord with the general thrust in the Framework which states at paragraph 54 that Local Planning Authorities should consider if allowing some market housing would facilitate the provision of affordable housing to meet local needs. The Framework also states at paragraph 173 that sites and the scale of development identified within the plan should not be subject to such a scale of obligations and policy burdens that the viability is threatened. Therefore TCE feels that, by virtue of dismissing cross-subsidy, the likelihood of affordable housing being provided to meet local needs is very low as development is unlikely to be viable. This approach is also not consistent with the Framework. We also note that the terms 'principal housing' and 'specialist housing' have not been defined. There is no glossary and to understand the use of these terms you have to go to the relevant policy pre-amble. Point 3 of this policy is poorly worded; it is not clear if the development must meet one, or more, or indeed any of the additional requirements listed in a) to h). We suggest rewording this to: 'Development within the National Park is considered to be acceptable in principle if it is otherwise in accordance with other specific policies within this plan and where it meets one or more of the following requirements: [List a) - h) as before]' The TCE is supportive of proposals not to define development boundaries, but rather to have a balanced judgement on the scale of development in relation to the existing settlement and take a 'common sense' approach to where new development may be appropriate.</p>
Gary Parsons Sport England	4.41 dlp307 Support	2. Planning Obligations/Community Infrastructure Levy (CIL) to Sport Policy GP5 Securing benefits pages 51/52 para 4.41-4.43 Sport England supports use of planning obligations/community infrastructure levy (CIL) as a way of securing the provision of new or enhanced places for sport and a contribution towards their future maintenance, to meet the needs arising from new development. This does need to be based on a robust NPPF evidence base (see above comment). This includes indoor sports facilities (swimming pools, sports halls, etc.) as well as playing fields and multi-use games courts. All new dwellings in Exmoor in the plan period should provide for new or enhance existing sport and recreation facilities to help

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		create opportunities for physical activity whilst having a major positive impact on health and mental wellbeing.
South West HARP Planning Consortium	GP5 dlp753 <b>Object</b>	Our first issue with GB5 is the use of unquantified terminology, in this case 'harm' which the policy is expecting development proposals to avoid. It is impossible to see how an applicant could begin to assess the acceptability of his/her proposal in the absence of any given criteria for attempting to understand how the Council will conceive harm. The policy has no reference to form or scale that could be applied to such an assessment. Further ambiguity surrounds the statement: 'it may be required that development be accompanied by limitations or contributions that go beyond those that can be secured by planning conditions'. Use of the word limitations in this context does not offer any clarity - however the policy wording implies that a limitation might be either i) a planning obligation; or ii) CIL. As per our previous representation, we remain of the view that the Council does not need to adopt CIL. Preparing a Charging Schedule is a lengthy and expensive process and, once adopted, it will diminish the ability of the Council to negotiate planning obligations. It appears that the Council agrees that there are few buildings large enough in the National Park to warrant a Charging Schedule being progressed and many of those that will be large enough will be providing mainly affordable (or 'social') housing, which of course is exempt. If CIL is not in place, the Council remains able to refuse permission unless planning obligations are written in to a Section 106 legal agreement in order to make a development acceptable. If that is the intention of this policy then more precise wording is needed.
The Crown Estate	GP5 dlp773 Support - subject to amendments	<p>Although TCE remains generally supportive of policy GP5 it still does not provide a sufficient level of detail regarding how the process of securing planning benefits will work in practice. Without this detail it is difficult to come to an informed judgement on this policy. In shaping policy GP5 the National Park Authority is encouraged to further consider the following comments.</p> <p>Planning obligations: The Local Planning Authority should have a detailed, up to date, evidence base that outlines the infrastructure requirements within Exmoor. The Infrastructure Delivery Plan (IDP) should be a 'live' document meaning that it will continue to evolve as circumstances change. The production of such a plan would provide developers with an indication of what will be required to make a proposed development acceptable in planning terms and has the benefit of informing developers of known infrastructure constraints which might impact certain developments. This would provide developers with a much needed sense of certainty</p>



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		<p>which has previously been missing. Community Infrastructure Levy The information on the Community Infrastructure Levy (CIL) contained within both the local plan and on the National Park's website is either vague or non-existent. Draft charging schedules are not available and it is hard to make a judgement as to how viable CIL maybe. It is proposed the CIL is reviewed through the Infrastructure Delivery Plan, but there is also no information on this document in the local plan or on the website. This makes it hard to form a judgement on the effectiveness of this policy. TCE is keen to ensure that the mechanism for securing developer contributions for infrastructure provision is appropriate, consistent and transparent. The benefit for developers in having a CIL is the transparency and certainty that comes with the charging schedule. The National Park Authority should, again, bear in mind the impact the charges may have on the financial viability of developments. The National Park Authority should also ensure that any evidence upon which the CIL rates are determined is up-to-date and regularly updated.</p>
Mr Ross Simmonds English Heritage South West	4.49 dlp683 Support	ACHIEVING ENHANCEMENT OF THE NATIONAL PARK Para 4.49 - 4.50 We support the approach taken in these policies.
Mr Ross Simmonds English Heritage South West	4.50 dlp684 Support	ACHIEVING ENHANCEMENT OF THE NATIONAL PARK Para 4.49 - 4.50 We support the approach taken in these policies.
Nell Cruse Somerset County Council	GP6 dlp355 General Comment	Typo - refers to Clause 6 in Clause 6.

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Mr Ross Simmonds English Heritage South West	GP6 dlp685 Support - subject to amendments	<p>We support the principal of this policy, however, it should be more explicit about definitions. While the historic environment may be part of the wider cultural heritage there should be clear reference to the historic environment in criterion 2. This would better align the policy to the NPPF and provide clarity to applicants of the role of the historic environment. Criterion 3 is broadly supported but currently requires rewording. It is not clear what it wants to achieve. Design of development that enhances the National Park should be an intrinsic part of the process and not an additional afterthought, as it appears to imply.</p>
<b>SECTION 5 – CONSERVING AND ENHANCING EXMOOR</b>		
Dr Duncan Jeffray Exmoor Society	Exmoor's Landscape dlp422 General Comment	<p>SETTING OF THE NATIONAL PARK Whilst we recognise that it is not possible to include policies in the Plan, that govern decisions made outside the National Park, the Society would like to ensure that all possible measures are undertaken to prevent damage to views into and out of the Park. This would involve pressure on those planning authorities whose boundaries join the National Park, to ensure that developments which damage 'the setting' of the Park are not permitted. It is anticipated that during the lifetime of the Plan there will be more proposals for green electrical energy production in the Bristol Channel, including wind turbines, tidal stream turbines etc. These could have serious detrimental effects on the Seascape. Such devices are likely to require pylons to convey the energy produced into the National Grid. The Society is aware of proposals that could require energy being brought ashore east of Minehead with a power line running eastwards to Williton. Such a development would be damaging to the setting of the National Park The Society is also concerned about planned housing developments on agricultural land south of the A39 between the Park boundary and Minehead. Should all this land to be taken up with housing it would have a detrimental effect on the setting of the National Park when seen from North Hill.</p>

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mark Funnell National Trust	Exmoor's Landscape dlp579 <b>Object</b>	Given the importance of the unspoilt undeveloped coastline to the Exmoor National Park, as mentioned in paragraphs 5.5 and 5.16, it is somewhat surprising that the objectives for Conserving and Enhancing Exmoor (Section 5; page 36) include no mention of coast or seascape. Whilst the Heritage Coast is identified on map 5.2 (page 39) the undeveloped coast has not been spatially defined on the Proposals Map which fails to provide cross-boundary consistency across administrative borders in line with the draft Devon Landscape Policy Group Advice Note (no.3) on Principles of defining and maintaining the character of Devon's Undeveloped Coast (Nov 2013). This is a particular concern given that spatial strategy establishes that no development boundaries are to be drawn for the defined settlements in Table 4.1 (GP4 [5]). The Exmoor National Park Local Plan should also include a strategic policy establishing a presumption against development within or affecting Devon's undeveloped coast in accordance with the advice note, rather than relying on the development management policy on Coastal Development, under the responding to Climate Change section, which is not strategic and lacks clarity. The draft Devon Landscape Policy Group Advice Note, which may be used by the Planning Inspectorate when examining the soundness of policies related to the undeveloped coast in local plans, is an outcome of the statutory duty to co-operate in the emerging draft Devon-wide Duty to Co-operate Protocol 'Planning strategically across local boundaries' (Advice Note; para 1.2).
Mrs Pamela Scragg Old Cleeve Parish Council	5.8 dlp646 General Comment	Map and key reference should be in colour together with alphabetical references 'A to I' next to the key blocks for clarity.
Mr Martin Wilsher West Somerset District Council	5.18 dlp885 <b>Object</b>	Reference is made to the application of the Landscape Sensitivity Study [36 Paul Bryan- Landscape Planning; Landscape Sensitivity Study - Exmoor National Park Authority 2013; Exmoor National Park Authority; 2013] in relation to settlements within the Exmoor National Park. There is concern over the inconsistency in which this has been applied. The text in the paragraph suggests that the application of the sensitivity testing has been applied to all the named settlements in the plan whilst the methodology itself reveals that only the 22 named locations in the adopted Local Plan were assessed [37 Paul Bryan- Landscape Planning; Landscape Sensitivity Study - Exmoor National Park Authority 2013: Methodology; Exmoor National Park Authority; 2013]. Also, the application of the testing was restricted to impact within the settlements rather than taking account of the potential land adjoining them.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mrs Pamela Scragg Old Cleeve Parish Council	5.18 dlp651 General Comment	<p>There is a need to make consistently clear throughout this Local Plan that the 'capacity' for development identified in the Landscape Sensitivity Study is 'landscape capacity' only, as the study itself makes explicit. Although this is clear in some paragraphs, in others it is not, especially where reference is made to 'overall capacity'. A solution for the present paragraph would be to insert 'in landscape terms' after 'each settlement'. Thereafter, it would be helpful to make consistent use of the term 'landscape capacity' rather than just 'capacity' when referring to this study (see paragraphs 5.18, 5.146, 5.148, notes 273 and 309, paragraphs 7.85, 11.224, and table 11.2, including main heading). NB reference in note 57 has the wrong date and reference in note 146 has the wrong title and date.</p>
Mr Martin Wilsher West Somerset District Council	5.28 dlp886 <b>Object</b>	<p>The final sentence suggests that the Exmoor National Park Authority will seek to influence the nature and scale of development outside of its LPA area when referring to views into and out of the National Park and its setting. In the context of the extant planning legislation [38 H.M. Government; Town and Country Planning Act, Chapter 8 (as amended); H.M.S.O.; 1990; ISBN 0 10 540890 5], Local Planning Authorities (LPA's) can only prepare development plans for their own respective areas unless they agree to produce a joint local plan. Paragraph 153 of the NPPF confirms this. The legislation does not permit one LPA to plan inside a neighbour unless it is as part of a jointly prepared Local Plan under the provisions of Sections 28- 31 of the Planning and Compulsory purchase Act [39 .M. Government; Planning and Compulsory Purchase Act 2004, Chapter 5 (as amended); The Stationary Office; 2004; ISBN 0 10 540504 3; pp.16 - 19] and associated Regulations. Whilst the former Somerset and Exmoor National Park Structure Plan [40 Somerset County Council and Exmoor National Park Authority; Somerset and Exmoor National Park joint structure Plan Review 1991- 2011: Explanatory Memorandum and Written Statement- Adopted, April 2000; Somerset County Council; 2001; ISBN 0 861 83357 0; p.30] made provision in Policy 2 of that document for the 'setting' of the National Park to be a consideration in the determination of planning applications outside of its area, the development plan status of this document was revoked in May 2013 [41 H.M. Government; Town and Country Planning, England: The Regional Strategy for the South West (Revocation) Order 2013- Statutory Instrument 2013 No.935 (S.I.2013:935); The Stationary Office; 2013; ISBN 978 0 11 153856 2].</p> <p>If there are any issues involving the setting of particular landscape features which are of a cross-LPA boundary nature need to be addressed by negotiation. Where these are deemed to be of a strategic nature, these should be addressed through the 'Duty to Co-operate'</p>

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
		provisions of Section 110 of the Localism Act [42 H.M. Government; Localism Act 2011, Chapter 20; op. cit.] and associated regulations.
Hugh Thomas Greater Exmoor Shoots Association	5.28 dlp325 <b>Object</b>	<p>We note that our role (that of GESA) has been marginalised in the latest draft plan by comparison with its precursor. We would respectfully suggest that the growth of this sector of the Exmoor economy has been noticeably greater than in any other area, and that ours is entirely without public funding (distinguishing Game Shooting from farming or tourism in general). (Even in Exford, the economic contribution (inter alia to hotels and B&amp;B) is significant by comparison with the popular concept of equestrian activity.) Some of the comments are grudging or lack an understanding of the advantages of game shooting to the National Park and the surrounding country.</p> <p>The negative element of the comments that follow [para. 5.28] below seem to us to be overplayed and unbalanced.</p>
Mrs Susan May Exmoor Trust	CE-S1 dlp316 Support	Lastly, the protection of our landscape, the heather, the deer and the ponies, wild life, flora and fauna, rivers, streams, moorlands, paths and bridleways, as well as our ancient hedges, walls, buildings, churches, farmsteads, pubs and pastimes is of paramount importance and is what makes Exmoor very special and any future local plan must bear this in mind when deciding policy.
Dr Duncan Jeffray Exmoor Society	CE-S1 dlp419 Support	The Society is very pleased to see the extensive use of the Exmoor National Park Landscape Character Assessment in the plan. We believe that this will bring a much higher level of sophistication to all planning decisions. The recognition of Seascape and the Heritage Coast and the support for the formation of Marine protected areas is most welcome. For these reasons the Society supports policy CE-S1 - LANDSCAPE CHARACTER
Mr Ross Simmonds English Heritage South West	CE-S1 dlp686 Support	CE-S1 Landscape Character c, d and f. We support this policy.
Mr Andrew Austen North Devon Council	CE-S1 dlp848 Support	NDC will recognise cross-boundary opportunities to conserve and enhance the landscape setting of the National Park in areas of contiguous landscape character with the ENPA.
Mr Bruce Nottrodt	CE-D1	Who will speak to the Welsh

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
	dlp142 Support	
J. Edgington	CE-D1 dlp365 General Comment	With reference to the feedback of the Local Plan consultation paper, the dark sky reserve status is fantastic, but as long as four years ago you said that street light would be turned off during early morning as is Parracombe, and yet nothing has happened, also there is a large amount of instant light being put up on houses and if I read your report correctly you may try and curb the use of these (my pet hates).
Alan Morgan	CE-D1 dlp391 Support - subject to amendments	The Landscape Assessment and Dark Sky Comments are apt.  However, I do feel that intermittent lighting should not be discouraged around remote properties to enable the occupants to conduct themselves about at night in safety, provided of course that it is discreet and only used for short periods.
Mr Andrew Austen North Devon Council	CE-D1 dlp849 Support	Welcome recognition and protection of the dark sky reserve and the proposed criteria for achieving it.
Mr Andrew Austen North Devon Council	Wildlife and Geological Conservation dlp850 <b>Object</b>	This section including Table 5.2 ought to include reference to North Devon's Biosphere Reserve designated in 2002, the only new style Biosphere Reserve in England. The western parts of the Park (catchment of the river Taw) fall within the Biosphere Reserve's Transition Area with a strategy for the community to thrive through effective participation in developing sustainable lifestyles that are reflected in the enhancement of the environment in which they live and work. The spatial implications of the Biosphere Reserve are considered to complement the Local Plan's wider aims and objectives including: delivery of green infrastructure networks, promoting ecosystem services through an integrated landscape-scale approach, effective water management, local food production and as a test-bed for sustainable development showcase living sustainably within areas of high environmental quality.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mr Christopher Adams	5.47 dlp237 General Comment	BRACKEN AND HABITAT. The word 'bracken' occurs only once within the whole document and this is only as a statement of an item in a list of habitats that are generally stated to be of national importance. Overall it is quite easy to get the impression that bracken is out of control on large areas of Exmoor. Has Exmoor NP sought expert advice on the potential benefits of large areas of uncontrolled bracken to wildlife and has the advice sought included full details of the potential benefits to wildlife that could be obtained by the control of the bracken and the management of those areas to achieve other forms of habitat? I can find no indication of this in the draft local plan.
Gary Parsons Sport England	5.56 dlp311 General Comment	5. Sport & Recreation in National Parks Green Infrastructure pages 82-85 para 5.56-5.79 Policy CE-D2 GI Provision pages 85-87 para 5.80-5.85 Policy RT-S1 Recreation & Tourism pages 307-311 para 9.9-9.20 Policy RT-D10 Recreational Development pages 336-339 para 9.72-9.83 National Parks are an important resource for sport, and provide opportunities for millions of people each year to participate in their chosen activity. PLANNING POLICY OBJECTIVE: To maintain and improve opportunities for sport in the National Parks (including The Broads) and to ensure that existing and new activities are managed and developed in a way which meets the purposes of National Park designation and sustainable development objectives. Sport England will promote policies and practices that: - seek to maintain and improve opportunities for outdoor sport in National Parks; - promote the use of good management practices to balance the legitimate needs of sport with other interests; - do not seek to impose a blanket ban on certain sporting activities within National Parks; - take account of the sporting needs of the resident community within National Parks; and - seek to identify sites for possible counter attractions which may relieve the pressure on the most sensitive areas. National Parks provide some of the finest natural resources for sport. By far the greatest number of visits to National Parks are made by walkers, but the Parks are also an important specialist resource for sports such as climbing, caving and water sports, where the resource can be of national significance. Every year hundreds, if not thousands, of such sporting events take place that rely upon the natural environment. A lot are the transient, peripatetic sporting events that the organising club sets up, the competition takes place, and afterwards any equipment (e.g. signage, fences, ropes, show jumps) are dismantled and the land reverts to its original use. These events can include equestrian activities, motorsport, cycling, running, canoeing and climbing events. What all these sporting activities tend to have in common is a control point where participants assemble, register for the event, and it acts as the start/finish point for the competition; sometimes village halls can support this. Such activities may have some purpose built ancillary

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		<p>facilities, such as a floating pontoon, clubhouse, bunkhouses, changing rooms and storage units. Although not always essential this supporting infrastructure can be crucial to enable a good level of competition. Because of the transient nature of these types of events, they tend to operate outside the planning system and rely on the provisions of Class B, Part 4 of the Town and Country Planning (General Permitted Development) Order 1995. Part 4 allows for the temporary change of use of land for either 14 or 28 days a year. Because of this, many local authorities do not even know that the events are taking place in their area. Occasionally some events do require planning permission and this tends to be where permitted development rights do not apply, or that the events have taken place more than 14 or 28 days per year and therefore exceed their permitted development rights. These events tend to use a range of different landscapes such as forests, waterways, moorland, old quarries, natural features such as rock faces and agricultural fields. Whilst some rely on using the rights of way network, other might use permissive routes such as private moorland tracks with the land owner's consent. Horse riding and mountain biking do also rely on manmade and more permanent cross county courses, which can sometimes require planning consent depending on scale and engineering work required. Sport on manmade routes and more peripatetic activities do happen in areas with landscape protection designations. The Scott Trial (see case study), for example, takes places in part on a Site of Special Scientific Interest, with the consent of the local planning authority and Natural England. Many rock faces are also designated SSSIs but still accommodate climbing competitions through a managed access protocol. Therefore landscape protection does not necessarily rule out a sporting event taking place. Case Study 1: Endurance: Endurance is long distance competitive horse riding. Many of these competitions take place in the countryside and utilise existing rights of way or tracks that cross private land. They tend to have a control point, this could be a field, or a local livery where there are access to stables. Rider register with the organiser at the control point and start the ride and finish the ride from the control point. The competition covers a number of routes set out at different competitive levels from novice to advance and riders are timed as they leave and return to the control point. The routes can be well defined such as a bridleway, or marked out with flags and markers to indicate the way. These events tend not to rely on permanent facilities, instead they are set up a few days before the event takes place and then after the event the flags, markers, control caravan anything else associated with the event are removed from the site. Endurance relies on a variety of different routes that can include river crossings, open moorland, forest tracks or even the beach. Case Study 2: The Scott Trial, Yorkshire Dales Many sporting events can be long standing ones. The Scott Trial has an extensive history beginning initially as an annual competition in 1907 where factory employees at the Scott Motorcycle</p>



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		<p>factory in Keighley, West Yorkshire, rode road going machines along various tracks and open moor land in the Yorkshire Dales - many of the roads were not metalled in those days. The event attracted many spectators and these spectating Edwardians viewed the event as 'a fair old scramble' and hence the term 'motorcycle scrambling' was born. The event takes place in and around Arkengarthdale and Swaledale towards the end of October and has run every year, bar the war years (due to fuel rationing), since 1907. The Scott Motorcycle Trial is one of the oldest motorsport events in the UK, possibly the world. The Trial began well before Leeds United Football Club was ever established and is possibly the oldest running (bar the war years) outdoor sporting event in Yorkshire after Grand St Ledger horse race at Doncaster. Sport England would encourage a 'positive for sport approach' Local Plan Policy to enable the existing and future users opportunity to take part in recreational activities that meet social, health and well-being agendas</p>
<p>Mike Highfield Somerset County Council</p>	<p>5.63 dlp248 Support</p>	<p>The Exmoor Plan has, in 1.11 identified that the National Planning Policy Framework has a presumption in favour of sustainable development. A planning proposal needs to demonstrate that sustainable criteria exist in three dimensions and a planning officer is instructed to consider all three. The requirement for acoustic consideration in planning falls under the 'environmental role' within which are the objectives of 'contributing to protecting and enhancing our natural, built and historic environment'. The ministerial foreword to the NPPF defined and extended the role of planning from one of scrutiny to one resulting in enhancement and improvement of surroundings as indicated by the statement 'Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives'. To assist in this there is now a requirement for applicants to seek early technical advice (192) and a need for LPAs to adopt proactive roles at pre-application (189, 190, 191) that help applicants solve problems (187). I consider the Exmoor Plan provides planning officers with opportunity to minimise the impact of some development at a pre-application stage (5.63, 5.111, 6.150, 6.175, 9.74, 10.56, 12.6) and stress the needs for more specific consideration of noise.</p>
<p>Dr Duncan Jeffray Exmoor Society</p>	<p>CE-S2 dlp420 Support - subject to amendments</p>	<p>The Society also supports policy CE-S2 though it has reservations over the final section 4d which indicates that possible damage, caused by a planning permission having been granted, might be mitigated. We believe that in most circumstances such mitigation is unlikely to succeed in replacing the habitat lost and that the replacement of some habitats is totally impossible e.g. ancient woodland.</p>

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Mr Justin Milward Woodland Trust	CE-S2 dlp364 <b>Object</b>	<p>Although we appreciate that ancient woodland on Exmoor falls across the protection categories in sections 4 a) - c) of Policy CE-S2, this does not provide the absolute protection that ancient woodland requires. Indeed we are concerned that the critical importance of the irreplaceability of ancient woodland is not fully explained in paragraphs 5.12 and 5.21- see Government's policy document 'Keepers of Time- A statement of Policy for England's Ancient &amp; Native Woodland' (Defra/Forestry Commission, 2005) for more information on the importance of ancient woodland. Every ancient wood is a unique habitat that has evolved over centuries, with a complex interdependency of geology, soils, hydrology, flora and fauna. This requires absolute protection in accordance with national policy as set out below. Ancient woodland, together with ancient/veteran trees, represents an irreplaceable semi natural habitat that still does not benefit from full statutory protection: for instance 86% of ancient woodland in the South West has no statutory protection. Government policy is increasingly supportive of absolute protection of ancient woodland and ancient trees. The new National Policy Planning Framework clearly states: 'planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland' (DCLG, March 2012, para 118). However this NPPF wording should be considered in conjunction with other stronger national policies on ancient woodland - The Government's policy document 'Keepers of Time- A statement of Policy for England's Ancient &amp; Native Woodland' (Defra/Forestry Commission, 2005, p.10) states: 'The existing area of ancient woodland should be maintained and there should be a net increase in the area of native woodland'. The Government's Independent Panel on Forestry states: 'Government should reconfirm the policy approach set out in the Open Habitats Policy and Ancient Woodland Policy (Keepers of Time- A statement of policy for England's ancient and native woodland).....Reflect the value of ancient woodlands, trees of special interest, for example veteran trees, and other priority habitats in Local Plans, and refuse planning permission for developments that would have an adverse impact on them.' (Defra, Final Report, July 2012). This has been endorsed by the response in the recent Government Forestry Policy Statement (Defra Jan 2013): 'We recognise the value of our native and ancient woodland and the importance of restoring open habitats as well as the need to restore plantations on ancient woodland sites. We, therefore, confirm our commitment to the policies set out in both the Open Habitats Policy and Keepers of Time, our statement of policy for England's ancient and native woodland'. The Government's Natural Environment White Paper - The Natural Choice: securing the value of nature (HM Government, July 2011, para 2.56) states that: 'The Government is committed to providing appropriate protection to ancient woodlands....'. The new Biodiversity Strategy for England (Biodiversity</p>

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		<p>2020: A Strategy for England's Wildlife &amp; Ecosystem Services, Defra 2011, see 'Forestry' para 2.16) states that- 'We are committed to providing appropriate protection to ancient woodlands and to more restoration of plantations on ancient woodland site'. The SW Forestry Framework (Forestry Commission, 2005) contains a key objective to 'Protect, improve and manage Ancient Semi-Natural Woodland...'. A good example of good Local Authority policy on ancient woodland is provided by North Somerset Council Core Strategy Adopted April 2012 - 'Policy CS4: Nature conservation North Somerset contains outstanding wildlife habitats and species. These include limestone grasslands, traditional orchards, wetlands, rhynes, commons, hedgerows, ancient woodlands and the Severn Estuary. Key species include rare horseshoe bats, otters, wildfowl and wading birds, slow-worms and water voles. The biodiversity of North Somerset will be maintained and enhanced by:... 3) seeking to protect, connect and enhance important habitats, particularly designated sites, ancient woodlands and veteran trees'. The Plan for Stafford Borough - Pre-submission publication: Jan 2013 states in Policy N5 that: 'New developments will be required to include appropriate tree planting, to retain and integrate healthy, mature trees and hedgerows, and replace any trees that need to be removed. Development will not be permitted that would directly or indirectly damage existing mature or ancient woodland, veteran trees or ancient or species-rich hedgerows'. The Swindon Borough Local Plan 2026 (Pre-Submission Draft - Dec 2012) states in Policy EN1 Green Infrastructure Network that: 'New developments will be required to include appropriate tree planting, to retain and integrate healthy, mature trees and hedgerows, and replace any trees that need to be removed. Development will not be permitted that would directly or indirectly damage existing mature or ancient woodland, veteran trees or ancient or species-rich hedgerows'.</p> <p>We would therefore like to see this policy amended to reflect national and local policy to read in paragraph 4(a) (upper case amendments): 'Development in, or likely to have an adverse effect, on the conservation objectives of internationally designated sites either directly or indirectly, including on features outside the designated site which support the ecological functioning of cited habitats and species, or on the integrity of special interest of nationally designated sites OR ANCIENT WOODLAND AND ANCIENT TREES will not be permitted.'</p>
Mr Andrew Austen North Devon Council	CE-S2 dlp851 Support - subject to amendments	Subject to recognising opportunities for an ecosystem services approach to the delivery of new development and to conserving and enhancing cross-boundary biodiversity links to land adjacent to the National Park.
Mr Bruce Nottrodt	5.67 dlp144 Support	Where possible transport and access corridors should be used to create wildlife corridors

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Gary Parsons Sport England	5.79 dlp312 General Comment	<p>5. Sport &amp; Recreation in National Parks Green Infrastructure pages 82-85 para 5.56-5.79 Policy CE-D2 GI Provision pages 85-87 para 5.80-5.85 Policy RT-S1 Recreation &amp; Tourism pages 307-311 para 9.9-9.20 Policy RT-D10 Recreational Development pages 336-339 para 9.72-9.83</p> <p>National Parks are an important resource for sport, and provide opportunities for millions of people each year to participate in their chosen activity. PLANNING POLICY OBJECTIVE: To maintain and improve opportunities for sport in the National Parks (including The Broads) and to ensure that existing and new activities are managed and developed in a way which meets the purposes of National Park designation and sustainable development objectives. Sport England will promote policies and practices that: - seek to maintain and improve opportunities for outdoor sport in National Parks; - promote the use of good management practices to balance the legitimate needs of sport with other interests; - do not seek to impose a blanket ban on certain sporting activities within National Parks; - take account of the sporting needs of the resident community within National Parks; and - seek to identify sites for possible counter attractions which may relieve the pressure on the most sensitive areas. National Parks provide some of the finest natural resources for sport. By far the greatest number of visits to National Parks are made by walkers, but the Parks are also an important specialist resource for sports such as climbing, caving and water sports, where the resource can be of national significance. Every year hundreds, if not thousands, of such sporting events take place that rely upon the natural environment. A lot are the transient, peripatetic sporting events that the organising club sets up, the competition takes place, and afterwards any equipment (e.g. signage, fences, ropes, show jumps) are dismantled and the land reverts to its original use. These events can include equestrian activities, motorsport, cycling, running, canoeing and climbing events. What all these sporting activities tend to have in common is a control point where participants assemble, register for the event, and it acts as the start/finish point for the competition; sometimes village halls can support this. Such activities may have some purpose built ancillary facilities, such as a floating pontoon, clubhouse, bunkhouses, changing rooms and storage units. Although not always essential this supporting infrastructure can be crucial to enable a good level of competition. Because of the transient nature of these types of events, they tend to operate outside the planning system and rely on the provisions of Class B, Part 4 of the Town and Country Planning (General Permitted Development) Order 1995. Part 4 allows for the temporary change of use of land for either 14 or 28 days a year. Because of this, many local authorities do not even know that the events are taking place in their area. Occasionally some events do require planning permission and this tends to be where permitted development rights do not apply, or that the events have taken place more than 14 or 28 days per year and therefore exceed their permitted development rights. These events tend to use a range of</p>

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		<p>different landscapes such as forests, waterways, moorland, old quarries, natural features such as rock faces and agricultural fields. Whilst some rely on using the rights of way network, other might use permissive routes such as private moorland tracks with the land owner's consent. Horse riding and mountain biking do also rely on manmade and more permanent cross country courses, which can sometimes require planning consent depending on scale and engineering work required. Sport on manmade routes and more peripatetic activities do happen in areas with landscape protection designations. The Scott Trial (see case study), for example, takes places in part on a Site of Special Scientific Interest, with the consent of the local planning authority and Natural England. Many rock faces are also designated SSSIs but still accommodate climbing competitions through a managed access protocol. Therefore landscape protection does not necessarily rule out a sporting event taking place. Case Study 1: Endurance: Endurance is long distance competitive horse riding. Many of these competitions take place in the countryside and utilise existing rights of way or tracks that cross private land. They tend to have a control point, this could be a field, or a local livery where there are access to stables. Rider register with the organiser at the control point and start the ride and finish the ride from the control point. The competition covers a number of routes set out at different competitive levels from novice to advance and riders are timed as they leave and return to the control point. The routes can be well defined such as a bridleway, or marked out with flags and markers to indicate the way. These events tend not to rely on permanent facilities, instead they are set up a few days before the event takes place and then after the event the flags, markers, control caravan anything else associated with the event are removed from the site. Endurance relies on a variety of different routes that can include river crossings, open moorland, forest tracks or even the beach. Case Study 2: The Scott Trial, Yorkshire Dales Many sporting events can be long standing ones. The Scott Trial has an extensive history beginning initially as an annual competition in 1907 where factory employees at the Scott Motorcycle factory in Keighley, West Yorkshire, rode road going machines along various tracks and open moor land in the Yorkshire Dales - many of the roads were not metalled in those days. The event attracted many spectators and these spectating Edwardians viewed the event as 'a fair old scramble' and hence the term 'motorcycle scrambling' was born. The event takes place in and around Arkengarthdale and Swaledale towards the end of October and has run every year, bar the war years (due to fuel rationing), since 1907. The Scott Motorcycle Trial is one of the oldest motorsport events in the UK, possibly the world. The Trial began well before Leeds United Football Club was ever established and is possibly the oldest running (bar the war years) outdoor sporting event in Yorkshire after Grand St Ledger horse race at Doncaster.</p>

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		Sport England would encourage a 'positive for sport approach' Local Plan Policy to enable the existing and future users opportunity to take part in recreational activities that meet social, health and well-being agendas
Alan Morgan	CE-S3 dlp392 Support	Encouragement to preserve and enhance Green Infrastructure is praiseworthy as are the intentions to protect historic parks and buildings and monuments.
Mr Martin Wilsher West Somerset District Council	CE-S3 dlp887 <b>Object</b>	Policy implies that the National Park Authority is the only decision-making body in respect of use of the Local Plan. However, other individuals and organisations can make planning determinations using the Local Plan policies including; the Planning Inspectorate, Secretary of State and, the Courts. Wording of policy needs re-phrasing to make it more generic in this respect.
Mr Andrew Austen North Devon Council	CE-S3 dlp852 Support	Welcome recognition of cross-boundary linkages to help support ecosystem services.
Gary Parsons Sport England	CE-D2 dlp313 General Comment	See comment ID dlp312 above
Mr Andrew Austen North Devon Council	CE-D2 dlp853 Support - subject to amendments	subject to adding more explicit recognition for recreational opportunities to enhance and expand the cross-boundary green infrastructure network, such as linking to the MacMillan Way, Tarka Trail, Two Moors Way and South West Coastal Footpath.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mr Ross Simmonds English Heritage South West	Cultural Heritage and Historic Environment dlp687 Support	Cultural Heritage and Historic Environment We support this section and the supporting text. The section usefully recognises the role of the historic environment as fundamental to the fabric of Exmoor and its landscape is defined by it. The clarity, from the Objectives, through national and non-designated assets, then to PALs and the HER is welcomed.
Mr Bruce Nottrodt	CE-S4 dlp143 Support - subject to amendments	This policy should include buildings and remains of industrial and commercial land
Alan Morgan	CE-S4 dlp393 Support	Encouragement to preserve and enhance Green Infrastructure is praiseworthy as are the intentions to protect historic parks and buildings and monuments.
Mr Ross Simmonds English Heritage South West	CE-S4 dlp688 Support - subject to amendments	We support this policy. In the opening paragraph it could usefully include settings. 'and heritage assets and their settings (valued...'
Mr James Wilmoth	CE-S4 dlp666 General Comment	On one hand you are saying that isolated traditional buildings such as field barns should be kept, but only considered suitable for a basic camping barn. How do you balance the need to spend money making the building suitable for even this basic use, with getting no viable return on your outlay? Also, even a basic use will require toilet facilities and who will maintain?
Mr Ross Simmonds English Heritage South West	5.97 dlp690 Support	We support and welcome this section.
Mr Martin Wilsher West Somerset District Council	5.98 dlp888 <b>Object</b>	The wording of the paragraph implies that the National Park Authority is the only decision-making body in respect of use of the Local Plan. However, other individuals and organisations can make planning determinations using the Local Plan policies including; the Planning Inspectorate, Secretary of State and, the Courts. Wording of the paragraph needs re-phrasing to make it more generic in this respect.
Mr Bruce Nottrodt	5.107 dlp106 Support	I believe that this should include industrial archaeological heritage assets as well as protecting the rebuilding of the Lynton and Barnstaple Railway

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mike Highfield Somerset County Council	5.111 dlp249 Support	The Exmoor Plan has, in 1.11 identified that the National Planning Policy Framework has a presumption in favour of sustainable development. A planning proposal needs to demonstrate that sustainable criteria exist in three dimensions and a planning officer is instructed to consider all three. The requirement for acoustic consideration in planning falls under the 'environmental role' within which are the objectives of 'contributing to protecting and enhancing our natural, built and historic environment'. The ministerial foreword to the NPPF defined and extended the role of planning from one of scrutiny to one resulting in enhancement and improvement of surroundings as indicated by the statement 'Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives'. To assist in this there is now a requirement for applicants to seek early technical advice (192) and a need for LPAs to adopt proactive roles at pre-application (189, 190, 191) that help applicants solve problems (187). I consider the Exmoor Plan provides planning officers with opportunity to minimise the impact of some development at a pre-application stage (5.63, 5.111, 6.150, 6.175, 9.74, 10.56, 12.6) and stress the needs for more specific consideration of noise.
Mr Bruce Nottrodt	CE-D3 dlp145 Support	This should include commercial and industrial heritage
Mr Ross Simmonds English Heritage South West	CE-D3 dlp689 Support	We support this policy.
Mark Funnell National Trust	CE-D3 dlp581 <b>Object</b>	Concerns are raised that this policy, whilst well-intentioned, does not align well with the NPPF tests in relation to harm, i.e. para's 133 and 134 requiring a balancing exercise. The policy should require developers to make a proportionate but systematic assessment of impact on setting as set out in 'The Setting of Heritage Assets' (English Heritage Guidance; 2011; paragraph 4.2).
Mr James Wilmoth	CE-D3 dlp667 General Comment	On one hand you are saying that isolated traditional buildings such as field barns should be kept, but only considered suitable for a basic camping barn. How do you balance the need to spend money making the building suitable for even this basic use, with getting no viable return on your outlay? Also, even a basic use will require toilet facilities and who will maintain?



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The Crown Estate	CE-D3 dlp774 Support	TCE is aware of the cultural and historic value of many of the listed and historically significant buildings within their ownership. They are keen to ensure that their integrity is maintained, making sure that they can be preserved and safeguarded for further generations- which sometimes comes at a high financial cost. Allowing some form of development, in line with the policy criteria, mean viable uses can be found which ensure their survival where necessary. Therefore the proposals relating to conserving heritage assets are welcomed by the TCE. They are pleased that the reuse of the assets is acceptable in principle insofar as the changes remain consistent with their conservation.
Mr Ross Simmonds English Heritage South West	5.112 dlp691 Support	The conversion of structural alterations of buildings. We support and welcome this section.
Paul Cottington National Farmers Union (South West)	CE-S5 dlp282 Support	We welcome policy CE-S5 which enables the reuse of redundant farm buildings which is very much in line with recent recommendations by DCLG. Redundant buildings are a considerable resource for many farmers and represent an opportunity to enable succession, diversification or farm modernisation.
Mrs Susan May Exmoor Trust	CE-S5 dlp317 Support	I was particularly pleased to see and hear that planning rules are going to allow the re-use of redundant traditional 'old' farm buildings, in an effort to allow succession farm dwellings which in turn will encourage younger members of farming families to be able to live at their place of work. These buildings also possibly being converted into business properties, housing, holiday lets or even recreational use.
Alan Morgan	CE-S5 dlp394 Support - subject to amendments	In general I am, in agreement with the plans for converting disused buildings so that they become useful again. I do however emphasize that the building should be suitable for the new purpose and conversion of corrugated iron structures seems to be a step too far.
Mr Ross Simmonds English Heritage South West	CE-S5 dlp692 Support	CE-S5 We support this policy

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mr Andrew Austen North Devon Council	CE-S5 dlp854 <b>Object</b>	The conversion of traditional buildings should refer to sustainable locational criteria with a requirement for any such conversion to be in an accessible location consistent with the objectives of the NPPF seeking to reduce the need to travel and promote sustainable transport choices. Criterion 4 for isolated traditional buildings should be restricted for use as camping barns (RT-D6).
Mark Funnell National Trust	CE-S5 dlp582 General Comment	General comment: These policies appear to take a balanced approach to the conversion of redundant buildings in line with Government policy, with control maintained over physical aspects.
The Crown Estate	CE-S5 dlp775 Support - subject to amendments	Exmoor is home to many redundant buildings with the potential to be converted to alternative uses and these will have an important role to play in meeting Exmoor's housing needs over the coming years. This an area where The Crown Estate can provide a significant contribution as it owns a significant number of traditional rural buildings, which no longer serve any functional use, that have the potential for residential conversion. Traditional, and often rural, buildings make a fundamental contribution to the richly varied character of Exmoor's rural building stock, landscape and local distinctiveness. They illustrate a long history of farming and settlement and exemplify the crafts and skills associated with local building materials and techniques. However, significant structural changes which have taken place in the farming industry over the last century have led to the construction of new buildings that economise on labour and conform to animal welfare regulations. These changes have resulted in many of Exmoor's traditional buildings becoming redundant. To prevent such buildings from falling into disrepair and indeed to prevent their demise as part of the wider rural landscape, it is important that they are given a new and viable use so that heritage assets can be retained and appreciated long into the future. The conversion and re-use of rural buildings is an inherently sustainable method of development as it is far less intrusive to adapt, and where necessary rebuild in part, an existing building than it is to introduce an entirely new building. This is especially the case within the National Park where the aim is to conserve or enhance the landscape setting. Such schemes are an excellent way of making the most efficient use of existing resources and reducing pressure of greenfield land and can make an important contribution to rural communities by providing new homes for local people. According to paragraph 55 of the Framework Local Planning Authorities should 'avoid isolated homes in the countryside unless there are special circumstances such as 'where the development would re-use redundant or disused buildings and lead to an enhancement to the immediate setting'. TCE also care to remind the NPA of the recent change in permitted development rights associated with the conversion of agricultural buildings- the new Class M (of Part 33 (changes

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
		<p>of use) of the GDPO) introduced by statutory instrument 2013 (no. 1101) which came into force on 30 May 2013. These changes were followed by additional consultation on (amongst other things) the re-use of existing redundant agricultural buildings for a dwelling house. This consulted on extending permitted development rights to allow an agricultural building to change use to residential use (C3) with associated physical development which would enable works necessary for the conversion, 'and where appropriate the demolition and rebuild, of the property on the same footprint'. This was contained within the consultation paper 'Greater flexibilities for change of use- Consultation' published in August 2013. In light of the existing permitted development rights and the consultation on their extension the CEC feel that the NPA should follow the outcome of future government policy carefully. They should also consider the relaxation of the policy to support the conversion of agricultural and/or traditional buildings 'in principle', regardless of their isolation. Proposals should be allowed if they satisfy the design requirements of the NPA and ensure protection of any protected species as required by law.</p>
Alan Morgan	CE-S6 dlp395 Support - subject to amendments	<p>In general I am, in agreement with the plans for converting disused buildings so that they become useful again. I do however emphasize that the building should be suitable for the new purpose and conversion of corrugated iron structures seems to be a step too far.</p>
Mrs Christine Fitzgerald Porlock Parish Council	CE-S6 dlp553 General Comment	<p>Sometimes sustainability if the property were to be in a climatically damp environment would mean modern materials would be more sustainable than traditional i.e. wood and reed thatching in a damp climate rot very quickly (Hawkcombe is a good example). We feel this policy should be more flexible.</p>
Mr Martin Wilsher West Somerset District Council	CE-S6 dlp889 <b>Object</b>	<p>Policy implies that the National Park Authority is the only decision-making body in respect of use of the Local Plan. However, other individuals and organisations can make planning determinations using the Local Plan policies including; the Planning Inspectorate, Secretary of State and, the Courts. Wording of policy needs re-phrasing to make it more generic in this respect.</p>

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mr Andrew Austen North Devon Council	CE-S6 dlp855 Support - subject to amendments	subject to an additional criterion requiring: any such conversion to result in an enhancement in the immediate setting of the building; no harm to the character and appearance of the rural area; and the need for any such conversion to be in an accessible location consistent with the objectives of the NPPF which seeks to reduce the need to travel and promote sustainable transport choices.
Mark Funnell National Trust	CE-S6 dlp583 General Comment	General comment: These policies appear to take a balanced approach to the conversion of redundant buildings in line with Government policy, with control maintained over physical aspects.
Mr Ross Simmonds English Heritage South West	5.133 dlp693 Support	Design and sustainable construction techniques. We support this section and the text.
Mrs Pamela Scragg Old Cleeve Parish Council	5.146 dlp652 General Comment	There is a need to make consistently clear throughout this Local Plan that the 'capacity' for development identified in the Landscape Sensitivity Study is 'landscape capacity' only, as the study itself makes explicit. Although this is clear in some paragraphs, in others it is not, especially where reference is made to 'overall capacity'. A solution for the present paragraph would be to insert 'in landscape terms' after 'each settlement'. Thereafter, it would be helpful to make consistent use of the term 'landscape capacity' rather than just 'capacity' when referring to this study (see paragraphs 5.18, 5.146, 5.148, notes 273 and 309, paragraphs 7.85, 11.224, and table 11.2, including main heading). NB reference in note 57 has the wrong date and reference in note 146 has the wrong title and date.
Mrs Christine Fitzgerald Porlock Parish Council	5.148 dlp555 General Comment	There should be more vigorous control of simple signage - there is not enough monitoring or enforcement at present and shops in particular are becoming festooned with advertising and posters. The regulations are there but not being enforced.

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Mrs Pamela Scragg Old Cleeve Parish Council	5.148 dlp653 General Comment	There is a need to make consistently clear throughout this Local Plan that the 'capacity' for development identified in the Landscape Sensitivity Study is 'landscape capacity' only, as the study itself makes explicit. Although this is clear in some paragraphs, in others it is not, especially where reference is made to 'overall capacity'. A solution for the present paragraph would be to insert 'in landscape terms' after 'each settlement'. Thereafter, it would be helpful to make consistent use of the term 'landscape capacity' rather than just 'capacity' when referring to this study (see paragraphs 5.18, 5.146, 5.148, notes 273 and 309, paragraphs 7.85, 11.224, and table 11.2, including main heading). NB reference in note 57 has the wrong date and reference in note 146 has the wrong title and date.
Colin Savage Exmoor, North Devon and West Somerset Rural Housing Project	5.159 dlp302 General Comment	Wherever possible housing needs to be designed to high levels of sustainability and energy efficiency, and being able to be adapted to meet the changing needs of occupants is essential when only limited amounts of housing can be provided. This does not necessarily need housing to have to comply with specific standards such as 'Lifetime Homes' or the 'Code for Sustainable Housing' as these are not always 'rural proofed' and better standards may develop through the period of the local plan. The underlying principles of these standards are, however, a useful starting point.
Mr David Britnell	CE-S7 dlp432 General Comment	Although there is probably little that can be done at present, the shading of properties by large trees can be a real problem especially in hilly country.
Mrs Christine Fitzgerald Porlock Parish Council	CE-S7 dlp554 General Comment	Sometimes sustainability if the property were to be in a climatically damp environment would mean modern materials would be more sustainable than traditional i.e. wood and reed thatching in a damp climate rot very quickly (Hawkcombe is a good example). We feel this policy should be more flexible.
Gary Parsons Sport England	CE-S7 dlp310 General Comment	4. Active Design Policy CE-S7- Design & Sustainable Construction Principles pages 112-113 para 5.153-5.154 Sport England believes that being active should be an intrinsic part of everyone's life pattern. The master planning of new housing proposal has a vital role in providing easy access to a choice of opportunities for sport and physical activity to suit all age groups for making new communities more active and healthy. Sport England commissioned David Lock & Associates to investigate the contribution that masterplanning can make to create new environments that maximise opportunities for participation in sport and physical activity. This work including a developer's checklist has been completed and can be accessed via

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
		<p><a href="http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/">http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/</a> Through an analysis of the current health agenda and urban design principles and good practice, the term ACTIVE DESIGN has been adopted to describe ways in which master planning can promote healthy environments through creating healthy environments through creating conditions for participation in sport and physical activity and the use of active travel modes (walking and cycling). Three overlapping Active Design objectives have been identified that should be promoted by master plans: improving accessibility; enhancing amenity and increasing awareness. Sport England would encourage new developments be designed in line with the Active Design principles (checklist) which could be Local Plan Policy</p>
Mr Ross Simmonds English Heritage South West	CE-S7 dlp694 Support	We support this policy.
Mr Oliver Reynolds Nettlecombe Parish Council	CE-S7 dlp673 <b>Object</b>	Standards set too high make low cost housing impossible to build. Only people from outside area can afford to build/buy.
Mr David Alford West Somerset District Council	CE-S7 Dlp606 Support – subject to amendments	<p>CE-S7 (k) proposes to place responsibility on the applicant to demonstrate their methods for energy conservation (and provision for SUDS) rather than taking reasonable opportunities under the outgoing CBS-12. Whilst in theory this will make design and access statements more transparent towards sustainable development, it is not clear how this will be measured, especially when this plan explains under s.5.163 that <i>'it is not considered practical to set local requirements for sustainable construction'</i>. Without setting local requirements (e.g. Code for Sustainable Homes (CfSH)) to measure this policy, this leaves the building regulations as the tool to use.</p> <p>This approach from ENPA is not surprising, and follows comments made in recent review by DCLG (2013) on housing standards, which explained that the CfSH has <i>'been successful in doing its job in terms of pointing the way forward. In light of this, the government does not now see a need for levels or separate carbon and energy targets in the Code - carbon and energy targets should be set in Building Regulations as we move towards zero carbon homes'</i>.</p> <p>Unfortunately however, Exmoor has very high carbon emissions, which highlights a need for effective planning (energy) policy to help mitigate. For example, the energy consumption allocated to end-user as per capita CO<sub>2</sub> emissions in West Somerset is currently the second highest in South West England (9.6t CO<sub>2</sub>, DECC 2013). It has remained high for a number of</p>

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		<p>years. As explained in this Council’s review and assessment report for air quality (WSC, 2012), the highest 1 km grid squares within this dataset were located;</p> <ul style="list-style-type: none"> <li>• Dulverton with 1690 tCO<sub>2</sub> (as C emitted per year) and,</li> <li>• Porlock with 1550 tCO<sub>2</sub>.</li> </ul> <p>Without a local requirement (e.g. Code Level 4 of CfSH) of improvements above the building regulations, this may well follow DCLG comments (2013), but this should not be used as an argument not to have more effective energy policy. Furthermore, it has been shown by Climate Action West (2008) that there is sufficient capacity to entirely off-set these emissions in Exmoor with renewable sources. DCLG (2013) reinforces this point and that there is an <i>‘important distinction to make between the energy performance of buildings and where the energy comes from’</i>, for which planning policy has a critical role to play.</p> <p>In this Housing review, DCLG (2013) added that developers will be required to <i>‘work with local planning who can identify opportunities where development can draw energy supply from decentralised renewable or low carbon energy supply systems’</i>. This does not just mean renewables; it extends to having an understanding of emission factors for various lower carbon fuel types. It also requires an understanding of how decisions made at planning can affect the SAP rating at the design stage. Whilst, design SAP assessments are required to be submitted to building control under Part-L, it is also possible to utilise the design SAP assessment as a predictive tool to ensure the lowest possible dwelling emissions and most affordable heating is achieved over the longer term.</p> <p>However, this plan explains that when submitting design and access statements, applicants should refer to the <u>Exmoor Design Guide</u>. This guidance is clearly out of date (published 1995). It does not adequately explain design SAP assessments, costs of heating and pay back periods expected, list of emission factors in choice of low carbon fuels, nor locations where renewable energy would be considered feasible (e.g. micro-hydro locations and when communal heating schemes may be appropriate).</p> <p>Reference to the current design guide should be removed from the adopted LDP and it would be preferable to explain that a more up to date supplement will be introduced and made available for consultation following adoption of this plan. It may be beneficial to have input from building control and other stakeholders when preparing this guide in conjunction with</p>

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		<p>worked examples showing effects of varying input values in the SAP calculation over other more traditional forms of energy sources.</p> <p>For example, there is an example in Brushford of a ground source heat pump with underfloor heating supplied by a borehole. This borehole supplies all the domestic water to the building. Without heating oil costs <u>and</u> annual water bills, as well as potential higher coefficient of performance (COP) than air source heat pump (Energy Saving Trust, 2010) makes this a potential viable alternative in Exmoor (availability of suitable groundwaters) instead of more conventional fuel choices. By providing worked examples with this guidance, backed up with SAP assessments, it should be possible to move towards the best examples of carbon neutrality and affordability in the longer term.</p> <p>Given the importance of energy, it would be recommended to verify and compare this policy against previous planning applications for example;</p> <ul style="list-style-type: none"> <li>• In planning application <u>6/9/10/112</u> for change of use from former Doctor's Surgery, Trumpington House, Dulverton to 2 x single story affordable dwellings, 2 x open market 2-storey dwellings.</li> <li>• The original heating to the surgery as many Dulverton residents would confirm, was supplied by electricity. The development to comply with building regulations (Part-L) for these 4 new dwellings would have needed to upgrade the levels of thermal insulation. But since this is a conversion of an existing building the Part-L emission test is much less stringent than the criteria for a new build.</li> <li>• However, by ensuring the most viable and lowest emission factor fuels were chosen using the design SAP at both planning and at building control stages, the question arises as what potential cost savings and carbon emissions could be have been achieved from a high quality design SAP assessment as per amended CE-S7 for Trumpington House?</li> </ul> <p>Therefore, it is proposed to amend policy CE-S7 with the following;</p> <p>Policy CE-S7; 'Development proposals should deliver high quality <b>low emission</b> sustainable designs that enhance the local identity and distinctiveness of Exmoor's built environment and landscape character and in doing so applicants will be expected to demonstrate the following design principles:'</p>



Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
		<p>'k) All residential and non-residential developments should demonstrate the integration of passive design and sustainable construction methods to improve or generate energy efficiencies, reduce carbon emissions and future proof development against climate change impacts, including flood risk by incorporating measures such as sustainable drainage systems. <b>In doing so, it will be expected a high quality SAP design assessment is submitted combining the lowest possible emission factor energy source(s) and one which is shown to be affordable over the longer term</b></p> <p>This amended policy would enable closer co-operation between planning, building control and environmental health departments. It would also provide the means to help assess policy CE-S7, allowing a better understanding of design constraints using SAP as this predictive tool. It may be beneficial to have access to the software to help verify and test development proposals.</p>
Mrs Molly Groves Exmoor Uprising	CE-S7 dlp872 General Comment	<p>Wooden homes are regularly erected in the NEW FOREST AND YORKSHIRE DALES AND IN THE CIRNGORMS WHERE they are actually recommended FOR WORKING YOUNG PEOPLE. What is good enough for other National Parks is good enough for Exmoor. The present fashion is to face every piece of architecture with wood. ----- The houses in Porlock are faced with wood, the house at Barbrook has been covered in wood. The [NAMES WITHHELD FOR DATA PROTECTION PURPOSES] houses at Cutcombe are Wooden ones. Permission was passed directly down the Delegated to the Chief Executive route for Two wooden houses to be erected at Luckyard farm Wheddon Cross, just below the then [NAME WITHHELD FOR DATA PROTECTION PURPOSES] place in place of 2 caravans. I notice only one is now being advertised for tourists so is the other another permanent wooden home around Wheddon Cross. WE UNDERSTAND SWEDEN USES LESS ELECTRICITY AND GAS IN THEIR HOUSES THAN ANY OTHER COUNTRY IN EUROPE. THAT IS BECAUSE THEY ARE SO VERY WELL INSULATED FOR BOTH SUMMER AND WINTER THEY DO NOT NEED SO MUCH HEATING OR AIR CONDITIONING. WITH A LOT OF WOOD IN THEM. ----- STONE AND CONCRETE IS NOT A WARM MEDIUM FROM WHICH TO BUILD HOMES. WOOD HAS A NATURALLY HIGHER INSULATING VALUE. THERE IS NOTHING WRONG WITH FLAT PACK , PREFABRICATED, MOBILE, HOMES THAT LOOK LIKE HOUSES AND NOT LIKE CARAVANS. IF THEY ARE CAREFULLY CHOSEN TO FIT IN. a. Prefabricated- various types to be looked at with care for design and fitting into local landscape. b. Prefabricated, wooden would easily fit any rural landscape, which save fuel and cost.</p>

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Mike Highfield Somerset County Council	5.169 dlp256 Support	Unfortunately neither the NPPF, or later explanatory information provide objective guidance on how to demonstrate if a development is a change for the better, or gives rise to what might be considered an acceptable environmental impact. The NPPF stipulates (10) that 'plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas'. I consider the Exmoor Plan has provided good opportunity to stress the importance of protecting tranquillity (2.3-1, 5.169, 6.91, CC-S3.f, CC-D4.d, 6.173, 9.7, 9.9, 9.10, RT-D4.2d, 9.78) and consider noise impact from development (CE-S8.h, CE-S9.2a, CE-D5.c, CC-D6.b, 6.157, 6.173, 6.175, 7.236, 8.42, 9.87).
Mr Ross Simmonds English Heritage South West	CE-D4 dlp695 Support	We support this policy.
Mr Ross Simmonds English Heritage South West	Minerals dlp696 Support	We support this section and the policy CE-S8 that encourages the small scale extraction of materials necessary for preserving traditional buildings and for maintaining the character of settlements.
Mike Highfield Somerset County Council	CE-S8 dlp268 Support	Unfortunately neither the NPPF, or later explanatory information provide objective guidance on how to demonstrate if a development is a change for the better, or gives rise to what might be considered an acceptable environmental impact. The NPPF stipulates (10) that 'plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas'. I consider the Exmoor Plan has provided good opportunity to stress the importance of protecting tranquillity (2.3-1, 5.169, 6.91, CC-S3.f, CC-D4.d, 6.173, 9.7, 9.9, 9.10, RT-D4.2d, 9.78) and consider noise impact from development (CE-S8.h, CE-S9.2a, CE-D5.c, CC-D6.b, 6.157, 6.173, 6.175, 7.236, 8.42, 9.87).
Paul Cottington National Farmers Union (South West)	CE-S8 dlp283 Support	Policy CE-S8 is particularly important given the need to use stone for new buildings and conversions. Many farms will have this resource on farm and support from ENPA is likely crucial to best access this resource.
Alan Morgan	CE-S8 dlp396 Support	I do agree that the establishment of small quarries to produce materials that are traditionally used locally i.e. slate and stone, should be encouraged but carefully controlled.

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Andy Hill Devon County Council	CE-S8 dlp410 Support	The approach to the small-scale supply of building stone is supported as it will assist in the supply of locally-distinctive building materials that will help to reinforce the character of Exmoor and surrounding areas. This policy is complementary to the similar approach that will be taken in Devon County Council's emerging Minerals Plan.
Mr Ross Simmonds English Heritage South West	CE-S8 dlp697 Support	We support this section and the policy CE-S8 that encourages the small scale extraction of materials necessary for preserving traditional buildings and for maintaining the character of settlements.
Mrs Pamela Scragg Old Cleeve Parish Council	CE-S8 dlp648 General Comment	Small scale working or reworking for building & roofing stone. Consideration may be given to 'banking' of stone that arises from either consents that require excavation, demolition or from forestry tracks after harvesting. Clear definition of 'small scale' working or reworking would be useful as limited amount of material may be gleaned from existing locations without detrimental impact, for instance- less than 5m <sup>3</sup> perhaps, without formal application.
Mr James Wilmoth	CE-S8 dlp668 Support	I like the idea that former quarries can be reopened to provide local stone for the repair of traditional buildings. This should be extended to providing stone for building a new house where this is allowed.
Mr Oliver Reynolds Nettlecombe Parish Council	CE-S8 dlp674 <b>Object</b>	Regs too tight, more local quarrying etc. should be allowed- save road miles.
Mike Highfield Somerset County Council	CE-S9 dlp269 Support	Unfortunately neither the NPPF, or later explanatory information provide objective guidance on how to demonstrate if a development is a change for the better, or gives rise to what might be considered an acceptable environmental impact. The NPPF stipulates (10) that 'plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas'. I consider the Exmoor Plan has provided good opportunity to stress the importance of protecting tranquillity (2.3-1, 5.169, 6.91, CC-S3.f, CC-D4.d, 6.173, 9.7, 9.9, 9.10, RT-D4.2d, 9.78) and consider noise impact from development (CE-S8.h, CE-S9.2a, CE-D5.c, CC-D6.b, 6.157, 6.173, 6.175, 7.236, 8.42, 9.87).

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Andy Hill Devon County Council	CE-S9 dlp411 Support	The approach to major mineral extraction is supported and reflects national policy. Given the adequate availability of crushed rock aggregate mineral resources from outside the National Park, there is no expectation on the part of Devon County Council that major mineral development is required within Exmoor.
Mike Highfield Somerset County Council	CE-D5 dlp270 Support	Unfortunately neither the NPPF, or later explanatory information provide objective guidance on how to demonstrate if a development is a change for the better, or gives rise to what might be considered an acceptable environmental impact. The NPPF stipulates (10) that 'plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas'. I consider the Exmoor Plan has provided good opportunity to stress the importance of protecting tranquillity (2.3-1, 5.169, 6.91, CC-S3.f, CC-D4.d, 6.173, 9.7, 9.9, 9.10, RT-D4.2d, 9.78) and consider noise impact from development (CE-S8.h, CE-S9.2a, CE-D5.c, CC-D6.b, 6.157, 6.173, 6.175, 7.236, 8.42, 9.87).
Mr Ross Simmonds English Heritage South West	CE-D5 dlp698 Support	We support this policy.
<b>SECTION 6 – RESPONDING TO CLIMATE CHANGE</b>		
Mr Andrew Austen North Devon Council	6 dlp857 Support	Policies CC- S1 / D1 to S5 / D6 (p.87 to p.106) important for NDC to ensure renewable energy development outside but potentially affecting the setting of the National Park does not conflict with ENPA's vision and objectives.
Marlene Allinson Cutcombe Parish Council	6 dlp288 General Comment	Section 6: Responding to Climate Change The Parish Council welcomes the work that has been done in this regard by ENPA, but is concerned that since a replacement Sustainability Officer has not been made after the departure of Tim Stokes, the implementation of the policies relating to Climate Change and Renewable Energy may become increasingly difficult and this area left somewhat 'on the back burner'.
Mr Neil Legg	Climate Change Mitigation and Adaptation dlp205 Support	Objective 18 could be supported by reinstating the old L&B railway which would take a significant amount of tourist traffic off the roads especially in the peak season. The existing historic railway system has numerous examples of this in the nearby west Somerset railway.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Alan Morgan	Climate Change Mitigation and Adaptation dlp397 General Comment	<p>3. Climate Change: here I am afraid my beliefs diverge from those of the Park Authority and I must admit those of many other people. I do agree that climate change is occurring and the planet does appear to be warming up. I am though less sure about the reasons for this phenomenon than many people. If we at this time choose the wrong causative options then huge amounts of money could be spent simply changing fuels without attacking the basic problems. Also whatever we do to reduce CO2 the emerging economies such as India and China will continue to burn their indigenous coal (China is reported to be building 50 coal fired power stations a year) and the products of combustion from these will swamp the savings being made by the Western economies and certainly that which Exmoor saved would be totally inconsequential. Surely the sensible plan would be to accept that global warming will occur and spend the money on defences against the changes.</p> <p>Polar Bears will move south and live like their close cousins the brow bears and Grizzlies. Food production will move north on the vast wheat producing plains of Canada and Russia and output might even become greater. We can emulate our Dutch partners and spend money on building sea defences to keep out the floods. I think in our small way we should be doing the same and the Porlock coast should be saved, not abandoned to the waves.</p> <p>Anyway I have made my point but I do think the Authority should not invest hard earned resources on small uneconomical schemes like the small hydro or small windmills that are an ineffectual waste of money. Big green schemes in our area like nuclear power plants are however a different matter and these should be encouraged despite the lingering doubts about their safety, because we need to work on making their operation one hundred percent safe so that we can adopt fusion power once it becomes economically feasible. After all the French seem to be happy with their predominantly nuclear power base.</p>
Mr Robin Leivers Environment Agency	6.1 -6.7 dlp451 - 457 Support	
Mrs Marilyn Crothers Nettlecombe Parish Council	6.8 dlp380 General Comment	6.8 No mention of orientation of new build or adaptations to maximise south facing aspect of roofs etc. to facilitate installation of P.V. units.
Mr Robin Leivers Environment Agency	6.8 – 6.16 dlp458 – dlp466 Support	
Mr Robin Leivers Environment Agency	CC-S1 dlp467 Support	

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mrs Christine Fitzgerald Porlock Parish Council	CC-S1 dlp557 General Comment	We recognise the impending impact of climate change on Porlock Marsh and would very much support the joint initiative on the development of the Marsh as an asset for wildlife and tourism as well as a facility for the enjoyment of the natural environment.
Mr Ross Simmonds English Heritage South West	CC-S1 dlp699 Support	We support this policy.
Mr James Wilmoth	CC-S1 dlp669 General Comment	Much more should be done to encourage small scale hydro-electric schemes as they can be fairly unobtrusive as opposed to wind vanes or even PV panels.
Mr Robin Leivers Environment Agency	6.22 – 6.26 dlp435 – dlp439 Support	
P.J. Jackson	6.26 dlp369 General Comment	3. Regarding the changes in weather we must look toward preparing the ground from the higher land to the lower land with a stream passing through a suitable site for a village pond and continuing into the final outlet alongside a river or the beach. Care must be taken in siting any pond or reservoir near housing.
Mr Andrew Austen North Devon Council	6.26 dlp856 Support	(paragraphs 6.26-6.30) for land management techniques that utilise ecosystem services to slow down and reduce runoff rates such as the MIRE project and woodland planting. It is important for this approach to be implemented on a catchment wide basis through cooperation between Local Authorities.
Mr Robin Leivers Environment Agency	6.27 – 6.36 dlp440 – dlp449 Support	
Mr Robin Leivers Environment Agency	CC-D1 dlp450 Support	

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mr Justin Milward Woodland Trust	CC-D1 dlp408 <b>Object</b>	<p>We would like to see Policy CC-D1 Flood Risk include a reference to using the natural environment – and especially woods &amp; trees - to help mitigate flood risk management.</p> <p>The Woodland Trust believes that trees and woodlands can deliver a major contribution to resolving a range of water management issues. They offer opportunities to make positive water use change whilst also contributing to other objectives, such as biodiversity, timber &amp; green infrastructure - see the Woodland Trust publication Woodland actions for biodiversity and their role in water management (pdf) - <a href="https://secure.woodlandtrust.org.uk/en/about-us/publications/Pages/ours.aspx">https://secure.woodlandtrust.org.uk/en/about-us/publications/Pages/ours.aspx</a> .</p> <p>In addition, a joint Environment Agency/Forestry Commission publication Woodland for Water: Woodland measures for meeting Water Framework objectives states clearly that: ‘There is strong evidence to support woodland creation in appropriate locations to achieve water management and water quality objectives’ (Environment Agency, July 2011- <a href="http://www.forestry.gov.uk/fr/woodlandforwater">http://www.forestry.gov.uk/fr/woodlandforwater</a>). This is most readily realisable at a Catchment scale.</p> <p>Most recently, the Government’s Independent Panel on Forestry (Defra, Final Report, July 2012) has emphasised these benefits by stating that:  ‘One of the many benefits of woods and trees is their ability to help us respond to a changing climate, better enabling us to adapt to future temperature increases. We know that trees, in the right places, help us to adapt to climate change by reducing surface water flooding; reducing ambient temperature through direct shade and evapo-transpiration; and by reducing building heating and air-conditioning demands. A landscape with more trees will also help increase the resilience of our rural areas, by reducing soil erosion and soil moisture loss. Improving the condition of existing woodlands, and the creation of a more resilient ecological network of associated habitats, will help wildlife adapt to climate change and other pressures’. This has been endorsed by the response in the recent Government Forestry Policy Statement (Defra Jan 2013) with the key objective (p.23) ‘Work with other organisations and initiatives to support the further development of markets in forest carbon and other ecosystem services such as water and biodiversity’, together with a Cumbria case study (p.22 - SCaMP) on water benefits from woodland creation.</p> <p>Woodland can help adaptation strategies cope with the high profile threats to water quality and volume resulting from climate change. The Forestry Commission’s publication, The Case</p>

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
		<p>for Trees in development and the urban environment (Forestry Commission, July 2010), explains how: 'the capacity of trees to attenuate water flow reduces the impact of heavy rain and floods and can improve the effectiveness of Sustainable Urban Drainage Systems'.</p> <p>The Pontbren Farmers project in Wales provides a good example of the role of trees in flood risk mitigation - <a href="http://www.woodlandtrust.presscentre.com/News-Releases/120-000-trees-ten-miles-of-hedgerows-and-no-loss-of-agricultural-productivity-d69.aspx">http://www.woodlandtrust.presscentre.com/News-Releases/120-000-trees-ten-miles-of-hedgerows-and-no-loss-of-agricultural-productivity-d69.aspx</a>.</p> <p>We would therefore like to see this policy amended to reflect national and local policy to read in paragraph 1(g) (upper case amendments): "Use development AND THE NATURAL ENVIRONMENT INCLUDING TREES AND WOODS to reduce the risk of flooding through location, layout and design and incorporate sustainable drainage systems to minimise surface water run-off and avoid pollution."</p>
Mr Robin Leivers Environment Agency	6.37 – 6.46 dlp468 – dlp477 Support	We would like to be consulted on any sea defence works
Mr Robin Leivers Environment Agency	CC-D2 dlp478 Support	
Mrs Christine Fitzgerald Porlock Parish Council	CC-D2 dlp558 General Comment	This will deter development of the Marsh area. We would recommend that the ENPA works within the known risks to protect this area for its biodiversity and environmental value.
Mark Funnell National Trust	CC-D2 dlp580 <b>Object</b>	The Exmoor National Park Local Plan should also include a strategic policy establishing a presumption against development within or affecting Devon's undeveloped coast in accordance with the advice note [draft Devon Landscape Policy Group Advice Note (no.3)], rather than relying on the development management policy on Coastal Development, under the responding to Climate Change section, which is not strategic and lacks clarity.
Mr Robin Leivers Environment Agency	6.52 – 6.59 dlp479 – dlp486 Support	We ask to be consulted and involved in all aspects and any impacts on the SMP



Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mr Mark Blathwayt	CC-S2 dlp41 General Comment	With regard to Porlock Weir, this section needs to be expanded so that the plan for this settlement goes further than merely looking at replacement facilities and also looks at the Housing needs of this community with a presumption in favour of allowing Affordable Housing in this settlement which should have "village" status
Alan Morgan	CC-S2 dlp398 General Comment	We can emulate our Dutch partners and spend money on building sea defences to keep out the floods. I think in our small way we should be doing the same and the Porlock coast should be saved, not abandoned to the waves.
Mr Robin Leivers Environment Agency	CC-S2 dlp487 Support	
Mr Ross Simmonds English Heritage South West	CC-S2 dlp700 Support - subject to amendments	English Heritage understands the approach to coastal change at Porlock Weir. There are a number of historic assets including listed buildings and archaeological potential in and around Porlock. The proposed strategy for Porlock Weir, identified in the policy, should consider the impacts upon historic environment and could be linked to policies on recording the historic environment.
Mr Robin Leivers Environment Agency	Water Conservation dlp488 Support	Paras. 6.60-6.66 - Support
Dave Ogborne Wessex Water	CC-D3 dlp345 Support	There are robust provisions associated with water resources, supply and sewerage infrastructure within the plan. We support the need for water efficiency measures and agree with the need for development proposals to complete appropriate assessments and demonstrate satisfactory capacity arrangements.
Alan Morgan	CC-D3 dlp403 Support	8. Utilities: Provision of electricity, water, communications networks and traffic management systems are an essential well thought out part of the plan.
Mr Robin Leivers Environment Agency	CC-D3 dlp489 Support	Make reference to the WFD as a key policy driver.
Mr David Alford	CC-D3 dlp608	Policy CC-D3 explains 'development proposals should demonstrate how water conservation measures will be incorporated in their proposals and how demand for water will be minimised,

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
West Somerset District Council	<b>Object</b>	<p>and including measures for the recycling, storage and reuse of rainwater and greywater. Retrofitting of existing properties will also be encouraged where appropriate'. This part appears to entirely replicate the building regulations (Part-G) and it is questionable whether this is actually needed. The approach under Part-G of Building regulations is to control water efficiency for the prevention of undue consumption of water, such as through control of water fittings and water re-use devices.</p> <p>What is more important before the conservation of water is ensuring there is a sufficient water supply in the first place. References to sufficiency to inform this development plan are unfortunately missing (references 202, 203, 204 and 205), but in any case these appear only to relate to South West Water and Wessex Water assets. There is however, a more vulnerable local resource than the well managed assets of these companies. This plan mentions in the more remote areas there may be private water supplies, but any inference to remoteness is misleading and tends to ignore their importance as a critical local resource. It should be explained instead that many parts of Exmoor are not well served by mains water and rely on local private abstractions. In the majority of cases it is not viable or feasible to connect to the local water company's main. These supplies can be sourced from the more shallow aquifers therefore, making them more prone to periods of extreme weather. Water scarcity is a risk identified by the Drinking Water Inspectorate in information note (DWI, 2012) following below average winter rainfall for two winters. Proposed policy CC-D3 explains that the installation of small scale reservoirs on farms will be supported. However, private water supplies are not only found on farms, it concerns all water for domestic purposes to any premise (as defined by s.218 of the Water Industry Act 1991) for drinking, washing, cooking, central heating and sanitary purposes. To help prevent insufficiency from occurring there should be a new specific policy to replace CC-D3. As proposed this new policy (private water policy (sufficiency)) could set out; 'For all new developments on a private water supply, applicants need to demonstrate there will be sufficient water, based on anticipated maximum use'. Anticipated maximum use should be calculated on the basis of 200 litres per person and normally with around 7-days capacity ensuring flows prevent stagnation. With the de-regulation of smaller abstraction licences by the Environment Agency this is the only method of control to ensure sufficient water supplies. This policy would also help protect those existing persons already on a private water supply if the proposed development is to distribute / share the existing supply and it would also introduce an effective test for new abstractions where no controls currently exist.</p>
Mr Robin Leivers Environment Agency	Low Carbon and Renewable Energy dlp490	Paras. 6.67-6.107: The Environment Agency regulates and permits many types of renewable energy schemes. Early consultation with ourselves is recommended to minimise delays.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
	Support	
Mr Ross Simmonds English Heritage South West	Low Carbon and Renewable Energy dlp701 Support	Low carbon and renewable energy development- Landscape and visual impact. We support this section.
Mr Ross Simmonds English Heritage South West	6.89 - 6.90 dlp702 – dlp703 Support	Paragraphs 6.89 and 6.90 We support this section. It usefully forms part of the strategy for the historic environment.
Mike Highfield Somerset County Council	6.91 dlp257 Support	Unfortunately neither the NPPF, or later explanatory information provide objective guidance on how to demonstrate if a development is a change for the better, or gives rise to what might be considered an acceptable environmental impact. The NPPF stipulates (10) that 'plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas'. I consider the Exmoor Plan has provided good opportunity to stress the importance of protecting tranquillity (2.3-1, 5.169, 6.91, CC-S3.f, CC-D4.d, 6.173, 9.7, 9.9, 9.10, RT-D4.2d, 9.78) and consider noise impact from development (CE-S8.h, CE-S9.2a, CE-D5.c, CC-D6.b, 6.157, 6.173, 6.175, 7.236, 8.42, 9.87).
Mike Highfield Somerset County Council	CC-S3 dlp258 Support	Unfortunately neither the NPPF, or later explanatory information provide objective guidance on how to demonstrate if a development is a change for the better, or gives rise to what might be considered an acceptable environmental impact. The NPPF stipulates (10) that 'plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas'. I consider the Exmoor Plan has provided good opportunity to stress the importance of protecting tranquillity (2.3-1, 5.169, 6.91, CC-S3.f, CC-D4.d, 6.173, 9.7, 9.9, 9.10, RT-D4.2d, 9.78) and consider noise impact from development (CE-S8.h, CE-S9.2a, CE-D5.c, CC-D6.b, 6.157, 6.173, 6.175, 7.236, 8.42, 9.87).

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mr David Britnell	CC-S3 dlp431 Support	There should be strong reasons why roof-mounted PV arrays should not be allowed as, like other roof furniture, they are now a familiar part of the street scene. In most circumstances they are a temporary addition and cause little or no damage to the underlying roof. It is worth noting that most householders of non-listed buildings have a right to paint the walls or roof any colour they wish, regardless of the fact that this has a permanent effect on the property. PV panels recover the energy of manufacture within a few months of use, are non-polluting and convert the incident energy of the sun relatively efficiently into electricity. Their life time is equal to that of a nuclear power station. As long as they are mounted in accordance with current regulations, (basically all within the outline of the roof), there should be no problems. I feel strongly that productive agricultural land should be used for food crops. Caution should be exercised in encouraging biomass crops as these exhibit very low energy conversion efficiency. There are strong financial incentives to encourage large solar arrays as an alternative to less productive agricultural land and these arrays can be under-grazed by stock which would also benefit from the shelter. Large areas of fleece or weedblock are demonstrably unsightly and although the effect on wild life is unknown at present, it is likely that it would be similar to monoculture. However, the environment would perhaps benefit from less use of weed-killers.
Mr Robin Leivers Environment Agency	CC-S3 dlp491 Support	
Mr Ross Simmonds English Heritage South West	CC-S3 dlp704 Support - subject to amendments	We support the principle of this policy, however, it could usefully be clearer in criterion c. that it applies to the historic environment. This would assist in forming part of the strategy for the historic environment.
Mark Funnell National Trust	CC-S3 dlp584 <b>Object</b>	In order to ensure adverse impacts (including 'cumulative landscape and visual impacts') are satisfactorily addressed in line with national policy (NPPF; para 97) the Trust believes reference should be made to the Devon-wide best practice guidance in the; 'Devon Landscape Policy Group Advice Note 2: Accommodating Wind and Solar PV Developments in Devon's Landscape: Guidance on minimising harm to the distinctive character and special qualities of Devon's landscape through sensitive siting and design' (LUC; June 2013).

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mr David Alford West Somerset District Council	CC-S3 dlp607 Support - subject to amendments	<p>When assessing scale, this policy should not be used to prevent the more viable hydro-electric schemes. In accordance with NPPF this LPA should have a policy which promotes renewable energy. There does not appear to be a policy aimed at promoting community projects. In the study conducted in Exmoor National Park by Loughborough University, it found 51 potential micro-hydro schemes. The more viable of these should be promoted as community investment opportunities. For biomass combustion scale is a factor for chimney heights, which are often approved on the basis of the methods described in the Chimney Heights: Third edition of the 1956 Clean Air Act Memorandum. However, the methodologies used to demonstrate stack height and that of Part-J Building Regulations, do not generally address modern air quality standards i.e. the method does not assess PM10. Chimney heights of biomass boilers over 45 kW requires controls other than those in Part-J of Building Regulations because of risks posed by PM10. Currently, the approach taken for biomass boilers over 50kW is described under Local Air Quality Management (Part IV of the Environment Act 1995) and for local authorities to assess the likelihood of an exceedance in the principal pollutants (PM10 and NO2) using published nomographs. Use of these nomographs is considered conservative, as they assume continuous operation of boilers at capacity (AEA, 2012). Policy CC-S3 should therefore add a clause to make it clear that all biomass boilers over 50kW should be notified to the local authority and subject to approval by the LPA. Defra in their review of the Clean Air Act 1993 and call for evidence paper (Defra, 2013) suggest that the notification of boilers is not well understood. Depending on the outcome of the consultation, Defra propose to use the system of planning to process the approvals. The consultation closed 29th Oct 2013.</p>
Mike Highfield Somerset County Council	CC-D4 dlp259 Support	<p>Unfortunately neither the NPPF, or later explanatory information provide objective guidance on how to demonstrate if a development is a change for the better, or gives rise to what might be considered an acceptable environmental impact. The NPPF stipulates (10) that 'plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas'. I consider the Exmoor Plan has provided good opportunity to stress the importance of protecting tranquillity (2.3-1, 5.169, 6.91, CC-S3.f, CC-D4.d, 6.173, 9.7, 9.9, 9.10, RT-D4.2d, 9.78) and consider noise impact from development (CE-S8.h, CE-S9.2a, CE-D5.c, CC-D6.b, 6.157, 6.173, 6.175, 7.236, 8.42, 9.87).</p>

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Mrs Christine Fitzgerald Porlock Parish Council	CC-D4 dlp560 General Comment	There is already too much noise within the Park and anything which adds to this should be discouraged. Apart from wind turbines this should also include Trial bikes, helipads for residential access etc.
Mr Ross Simmonds English Heritage South West	CC-D4 dlp705 Support - subject to amendments	As with CC-S3 there could be a better reference to the historic environment.
Mr Andrew Austen North Devon Council	CC-D4 dlp858 Support - subject to amendments	Subject to criterion (a) being deleted. If a small scale turbine can satisfy criteria (b-f) then any adverse impact will have been minimised. Consequently, the requirement (criterion a) for it to be linked to the property being served or restricted to 20 metres is unnecessary.
Mr Robin Leivers Environment Agency	6.112 – 6.115 dlp492 – dlp495 Support	
Mr Robin Leivers Environment Agency	CC-D5 dlp496 Support	
Mrs Christine Fitzgerald Porlock Parish Council	CC-D5 dlp559 Support	Agree that these should not be visible. This should also cover agricultural fleece such as at Horner. This is visible for miles and impacts and degrades the countryside for the enjoyment of everyone.
Mr Ross Simmonds English Heritage South West	CC-D5 dlp706 Support	We support this policy.
Mr Robin Leivers Environment Agency	6.132 – 6.137 dlp497 – dlp502 Support	
J. Edgington	CC-S4 dlp366 General Comment	Talking about pet hates, Devon County Council have just informed us that they are going to stop Lyndown local tip, this is madness. I am waiting for a report from North Devon Council to how many times people have called them out over fly tipping. I have called them out many times to pick up dumping in our laybys and fields, please try to practice what you are preaching in your paper (small scale facilities for your rubbish) and help us to keep our local tip for all the local villages that use it. It is a 50 mile trip to Barnstaple or Ilfracombe - don't spoil our Park for the sake of £250 every two months.

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Andy Hill Devon County Council	CC-S4 dlp412 Support	The approach to waste management is supported as it positively provides for small-scale facilities to meet local needs and encourages the sustainable management of waste arising from within the National Park. Devon County Council recognises that much of Exmoor's waste will be most appropriately managed outside the National Park, and Devon County Council's emerging Waste Plan makes provision for this.
Mr Robin Leivers Environment Agency	CC-S4 dlp503 Support	
Mr Martin Wilsher West Somerset District Council	CC-S4 dlp890 <b>Object</b>	Policy implies that the National Park Authority is the only decision-making body in respect of use of the Local Plan. However, other individuals and organisations can make planning determinations using the Local Plan policies including; the Planning Inspectorate, Secretary of State and, the Courts. Wording of policy needs re-phrasing to make it more generic in this respect.
Mr Ross Simmonds English Heritage South West	CC-S4 dlp707 Support	We support this policy.
Mrs Jill Jones	CC-S4 dlp426 General Comment	Omission? Devon waste operators for Devon?
Mr Oliver Reynolds Nettlecombe Parish Council	CC-S4 dlp675 General Comment	If units too small, can be too expensive- not viable.
The Crown Estate	CC-S4 dlp776 <b>Object</b>	Whilst TCE have no plans introduce Anaerobic Digesters (AD) at present they are concerned that the criterion 3 of this policy (which does not allow waste to be imported from surrounding communities) with regards to AD is unrealistic. It is understood that AD require large amounts of waste to make them viable and as productive as possible. By introducing a restriction that waste used in the process is limited only to the local community and not from further field, renders the entire concept unworkable.  The CEC suggest that there should be more flexibility within the policy in order to encourage this sustainable form of managing waste and producing green fuel and energy.
Mr Robin Leivers Environment Agency	6.138 – 6.149 dlp504 – dlp515 Support	

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Mike Highfield Somerset County Council	6.150 dlp250 Support	The Exmoor Plan has, in 1.11 identified that the National Planning Policy Framework has a presumption in favour of sustainable development. A planning proposal needs to demonstrate that sustainable criteria exist in three dimensions and a planning officer is instructed to consider all three. The requirement for acoustic consideration in planning falls under the 'environmental role' within which are the objectives of 'contributing to protecting and enhancing our natural, built and historic environment'. The ministerial foreword to the NPPF defined and extended the role of planning from one of scrutiny to one resulting in enhancement and improvement of surroundings as indicated by the statement 'Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives'. To assist in this there is now a requirement for applicants to seek early technical advice (192) and a need for LPAs to adopt proactive roles at pre-application (189, 190, 191) that help applicants solve problems (187). I consider the Exmoor Plan provides planning officers with opportunity to minimise the impact of some development at a pre-application stage (5.63, 5.111, 6.150, 6.175, 9.74, 10.56, and 12.6) and stress the needs for more specific consideration of noise.
Mr Robin Leivers Environment Agency	6.150 – 6.153 dlp516 – dlp519 Support	
Mike Highfield Somerset County Council	CC-D6 dlp271 Support	Unfortunately neither the NPPF, or later explanatory information provide objective guidance on how to demonstrate if a development is a change for the better, or gives rise to what might be considered an acceptable environmental impact. The NPPF stipulates (10) that 'plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas'. I consider the Exmoor Plan has provided good opportunity to stress the importance of protecting tranquillity (2.3-1, 5.169, 6.91, CC-S3.f, CC-D4.d, 6.173, 9.7, 9.9, 9.10, RT-D4.2d, 9.78) and consider noise impact from development (CE-S8.h, CE-S9.2a, CE-D5.c, CC-D6.b, 6.157, 6.173, 6.175, 7.236, 8.42, 9.87).
Dave Ogborne Wessex Water	CC-D6 dlp346 Support	There are robust provisions associated with water resources, supply and sewerage infrastructure within the plan. We support the need for water efficiency measures and agree with the need for development proposals to complete appropriate assessments and demonstrate satisfactory capacity arrangements.



Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Dave Ogborne Wessex Water	CC-D6 dlp347 General Comment	Safeguards are in place to prevent creating a statutory nuisance associated with odour emissions from sewerage infrastructure. We can confirm development restraint zones around sewerage treatment works if required to assist consultations with Wessex Water.
Mr Robin Leivers Environment Agency	CC-D6 dlp520 Support	
Mr Robin Leivers Environment Agency	6.154 – 6.156 dlp521 - dlp523 Support	
Mike Highfield Somerset County Council	6.157 dlp261 Support	Unfortunately neither the NPPF, or later explanatory information provide objective guidance on how to demonstrate if a development is a change for the better, or gives rise to what might be considered an acceptable environmental impact. The NPPF stipulates (10) that 'plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas'. I consider the Exmoor Plan has provided good opportunity to stress the importance of protecting tranquillity (2.3-1, 5.169, 6.91, CC-S3.f, CC-D4.d, 6.173, 9.7, 9.9, 9.10, RT-D4.2d, 9.78) and consider noise impact from development (CE-S8.h, CE-S9.2a, CE-D5.c, CC-D6.b, 6.157, 6.173, 6.175, 7.236, 8.42, 9.87).
Mr Robin Leivers Environment Agency	6.157 – 6.172 dlp524 – dlp539 Support	
Mike Highfield Somerset County Council	6.173 dlp247 Support - subject to amendments	If the terminology of the NPSE is appropriate to the Exmoor Plan then it may be beneficial to clarify an intention to broaden the consideration of noise impact from residential locations to those locations associated with recreational and tourism land use. An objective that the Exmoor Plan might consider, would be to ensure development noise impacts are kept below the lowest observed adverse effect level (LOAE) in regions of valued tranquillity. This would infer by definition that 'noise can be heard, but does not cause any change in behaviour or attitude. Can slightly affect the acoustic character of the area but not such that there is a perceived change in the quality of life.' This may then help to ensure development proposals provide more distant consideration of noise impact, extended beyond residential locations and afford better planning opportunity to avoid the gradual erosion of tranquillity where this may

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
		<p>have a greater affect on the character of an area and influence tourism. The World Health Organisations document on the Guidelines for Community Noise 1999 could also provide further helpful wording in suggesting that existing quiet outdoor areas should be preserved by ensuring the ratio of intruding noise to natural background sound be kept low.</p>
<p>Mike Highfield Somerset County Council</p>	<p>6.173 dlp260 Support</p>	<p>Unfortunately neither the NPPF, or later explanatory information provide objective guidance on how to demonstrate if a development is a change for the better, or gives rise to what might be considered an acceptable environmental impact. The NPPF stipulates (10) that 'plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas'. I consider the Exmoor Plan has provided good opportunity to stress the importance of protecting tranquillity (2.3-1, 5.169, 6.91, CC-S3.f, CC-D4.d, 6.173, 9.7, 9.9, 9.10, RT-D4.2d, 9.78) and consider noise impact from development (CE-S8.h, CE-S9.2a, CE-D5.c, CC-D6.b, 6.157, 6.173, 6.175, 7.236, 8.42, 9.87).</p>
<p>Mr Robin Leivers Environment Agency</p>	<p>6.173 – 6.174 dlp540 – dlp541 Support</p>	
<p>Mike Highfield Somerset County Council</p>	<p>6.175 dlp251 Support</p>	<p>The Exmoor Plan has, in 1.11 identified that the National Planning Policy Framework has a presumption in favour of sustainable development. A planning proposal needs to demonstrate that sustainable criteria exist in three dimensions and a planning officer is instructed to consider all three. The requirement for acoustic consideration in planning falls under the 'environmental role' within which are the objectives of 'contributing to protecting and enhancing our natural, built and historic environment'. The ministerial foreword to the NPPF defined and extended the role of planning from one of scrutiny to one resulting in enhancement and improvement of surroundings as indicated by the statement 'Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives'. To assist in this there is now a requirement for applicants to seek early technical advice (192) and a need for LPAs to adopt proactive roles at pre-application (189, 190, 191) that help applicants solve problems (187). I consider the Exmoor Plan provides planning officers with opportunity to minimise the impact of some development at a pre-application stage (5.63, 5.111, 6.150, 6.175, 9.74, 10.56, and 12.6) and stress the needs for more specific consideration</p>

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
		of noise. Unfortunately neither the NPPF, or later explanatory information provide objective guidance on how to demonstrate if a development is a change for the better, or gives rise to what might be considered an acceptable environmental impact. The NPPF stipulates (10) that 'plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas'. I consider the Exmoor Plan has provided good opportunity to stress the importance of protecting tranquillity (2.3-1, 5.169, 6.91, CC-S3.f, CC-D4.d, 6.173, 9.7, 9.9, 9.10, RT-D4.2d, 9.78) and consider noise impact from development (CE-S8.h, CE-S9.2a, CE-D5.c, CC-D6.b, 6.157, 6.173, 6.175, 7.236, 8.42, 9.87).
Mr Robin Leivers Environment Agency	6.175 – 6.177 dlp542 – dlp544 Support	
Mr Robin Leivers Environment Agency	CC-S5 dlp545 Support	
<b>SECTION 7 – ACHIEVING A THRIVING COMMUNITY</b>		
Mr Kevin Green	7 dlp434 General Comment	I see nothing that addresses the importance of small businesses and how they can add to the enjoyment of visitors. A thriving community is made up of a variety of people- some young, some retired and some who need to earn a living. What are you doing to help/encourage/support the latter? My experience is that Exmoor N.P.A. goes out of its way to make life difficult for small businesses, who in my instance attract visitors and income to our area.
Mr Justin Milward Woodland Trust	7 dlp409 Object	<p>We would like to see a reference in this section to the importance of planning for health &amp; wellbeing, with particular regard to the role that green infrastructure – especially trees and woods – can play in delivering positive health outcomes. The Health and Wellbeing Board in the <b>Somerset Health &amp; Wellbeing Strategy</b> supports planning policy and decisions which promote positive impacts on the environment and healthy lifestyles.</p> <p>Although the relationship between the natural environment and health is a complex one, it is increasingly accepted that green infrastructure – such as trees, woods and forests – can contribute to both preventative and restorative wellbeing solutions.</p>

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
		<p>Increasing evidence has demonstrated the critical impact that trees can make in encouraging more active lifestyles and alleviating the symptoms of some of our most debilitating conditions such as dementia, obesity, heart disease and mental health problems.</p> <p>For instance, in relation to air quality, there is evidence that trees improve air quality through the absorption of particulates from vehicle emissions and other sources – such that it has been estimated that doubling the tree cover in the West Midlands alone would reduce mortality as a result of poor air quality from particulates by 140 people per year. (Stewart, H., Owen S., Donovan R., MacKenzie R., and Hewitt N. (2002). <i>Trees and Sustainable Urban Air Quality</i>. Centre for Ecology and Hydrology, Lancaster University). The Woodland Trust has published a new report on how trees can specifically help improve air quality – see <b>Urban Air Quality</b> <a href="http://www.woodlandtrust.presscentre.com/Media-Library/Air-Quality-report-77a.aspx">http://www.woodlandtrust.presscentre.com/Media-Library/Air-Quality-report-77a.aspx</a>.</p> <p>This linkage between woodland and health is now firmly embedded in national Government policy for health, planning and forestry -</p> <ul style="list-style-type: none"> <li>• <b>Health:</b> <i>“Access to green spaces is associated with better mental and physical health across socioeconomic groups.....Defra will lead a national campaign to increase tree planting throughout England, particularly in areas where tree cover would help to improve residents’ quality of life and reduce the negative effects of deprivation, including health inequalities.” <b>Healthy Lives, Healthy People</b> (Government White Paper, November 2010, paras 3.36-37).</i></li> <li>• <b>Planning:</b> <i>“Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision.” <b>National Planning Policy Framework</b> (DCLG, March 2012, para 73).</i></li> <li>• <b>Forestry:</b> <i>“Our trees, hedgerows, woods and forests contribute significantly to the quality of life in both rural and urban areas. Amongst other things, they enhance the local environment and biodiversity, support economic growth through regeneration, help mitigate the impact of climate change, assist in reducing air pollution and provide important health and educational benefits....The Natural Environment White Paper recognised the value and potential for green spaces to support and contribute to everyone’s health and well-being. This is being reflected in the Public Health Outcomes Framework, which underpins the new public health duty of local authorities’.</i> <b>Government Forestry Policy Statement</b> (Defra, January 2013, p.16).</li> </ul>

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		<p>Recognising this linkage, the Woodland Trust has researched and developed the Woodland Access Standard (WAS<sub>t</sub>) for local authorities to aim for, encapsulated in our <i><b>Space for People</b></i> publication. We believe that the WAS<sub>t</sub> can be an important policy tool complimenting other access standards used in delivering green infrastructure for health benefits.</p> <p>The WAS<sub>t</sub> is complimentary to Natural England’s ANGST+ and is endorsed by Natural England. The Woodland Trust Woodland Access Standard recommends:</p> <ul style="list-style-type: none"> <li>- <b>that no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size</b></li> <li>- <b>that there should <u>also</u> be at least one area of accessible woodland of no less than 20ha within 4km (8km round-trip) of people’s homes.</b></li> </ul> <p>Providing more accessible trees, woods and green space could provide a critical link to healthier lives.</p> <p>We would therefore like to see this reflected in the Local Plan with a new paragraph in Chapter 7 reading: “Development should seek opportunities to deliver green infrastructure including woods and trees to improve the health &amp; wellbeing of those who live and work on Exmoor”</p>
Susan Green Home Builders Federation	7 dlp757 General Comment	<p>Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new 'for sale' market housing built in England and Wales as well as a large proportion of newly built affordable housing. We would like to submit the following comments. The Draft Exmoor Local Plan seeks to meet the needs of local communities through policies to support the provision of local needs affordable housing for those who may live and / or work on Exmoor. Whilst open market housing will only be permitted in the form of principle residence housing, if necessary to fund affordable housing. On this basis green-field sites, which are treated as exception sites, will provide 100% affordable housing and brown-field sites may be 50% affordable and 50% market housing. However the Draft Local Plan provides no housing requirement figure. Likewise the Northern Peninsula Strategic Housing Market Area Assessment (SHMAA) dated 2008 covering West Somerset, North Devon, Torridge and Devon County Council's provided no indication of an assessment of housing needs within the Exmoor National Park. Similarly the up-dated SHMA Report for North Devon &amp; Torridge dated 2012 does not identify housing needs within the National Park. At this time, the Exmoor National Park in West Somerset SHMA is not available</p>

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		<p>for comment. There should be an objective assessment of housing need. The inclusion of a housing requirement figure within a policy of the Local Plan should also be considered.</p> <p>There should be an objective assessment of housing need. The inclusion of a housing requirement figure within a policy of the Local Plan should also be considered.</p>
Mrs Heather Crockford West Somerset District Council	7 dlp596 General Comment	<p>Inclusion of social housing stock and re-letting: General: The Draft consultation Local Plan does not contain any data on existing supply of social housing stock or re-lets. It would be useful to have this contextual information included- potentially in the Housing Stock Section on Page 124- as this will remain the major way of meeting housing needs. This is a key point as the re-let figures indicate that the majority of need could be met from the existing stock. Para 7.39 states that the projected net need is 427 for the period 2011-31 which equals 21 per year. The re-let figures show there were an average of 24 general needs re-lets per year from 2010/11 to 2012/13. A number of tables should be included such as those showing figures for the existing stock; overall re-lets during the 3 years from Apr 2010 to Mar 2013; general needs &amp; sheltered; bedroom size; parish. Examples of such tables are detailed below. By including this information the various references to the existing supply will be placed in a better context- e.g. paras 7.40 and 7.69. Furthermore, the small need referred to in para 7.35 may well be met from re-lets. Overall, the re-lets data will help to focus any future new build where it is most needed.</p>
Mr Martin Wilsher West Somerset District Council	7.4 dlp891 <b>Object</b>	<p>Wording of the text implies that the National Park, in the production of the Local Plan, is exempt from the provisions of the National Planning Policy Framework (NPPF) due to paragraph 14 and its footnote [43 Department for Communities and Local Government; National Planning Policy Framework- March 2012; Department for Communities and Local Government; 2012; ISBN 978 1 4098 3413 7; p.4] including its, 'presumption in favour of sustainable development'. The footnote referred to makes clear that it recognises the special status conferred on such places is used as an example only and relates to their application in the context of other policies contained within the NPPF. National Parks are only specifically referred to in policy terms within the NPPF in paragraph 115 [44 ibid; pp.26- 27] - in relation to the weight to be attributed to conserving landscape and scenic beauty and, paragraph 144 [45 ibid; p.34] - in relation to minerals planning applications. Whilst the former includes a reference footnote to the Defra Circular of 2010 [46 Department for the Environment Food and Rural Affairs; English National Parks and the Broads: UK Government Vision and Circular 2010- March 2010; Department for Environment Food and Rural Affairs; 2010], this makes clear that it is only in relation to, 'the statutory purposes, management and other matters' but no mention of planning.</p>

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		<p>The NPPF makes clear in paragraphs 17 and 47 [47 Department for Communities and Local Government; National Planning Policy Framework- March 2012; op. cit.; p.5 &amp; pp.12- 13] that all LPA's are expected to plan positively and identify and then meet the housing, business and other development needs of the area. In terms of housing this requires establishing what the objectively identified housing need (of all tenures) is within the LPA area. As the NPPF post-dates the Defra Circular, it forms the latest Government statement in respect of policy and in particular planning policy. Paragraph 6 of the NPPF [48 Department for Communities and Local Government; National Planning Policy Framework- March 2012; op. cit.; p.2] makes it clear that the policy content of paras. 18 to 219 constitutes the Government's view of sustainable development and all relevant parts, with the exception of those specifically referred to above, apply to all LPA's including National Parks.</p>
<p>Mr Martin Wilsher West Somerset District Council</p>	<p>7.5 dlp892 <b>Object</b></p>	<p>The text suggests that the housing provision for the National Park contained in the former, emerging Regional Spatial Strategy (RSS) for the South West [49 Government Office for the South West; The Draft Revised Regional Spatial Strategy for the South West Incorporating the Secretary of State's Proposed Changes- for Public Consultation, July 2008; Government Office for the South West; 2008.] was in some way different from the requirements provided for other LPA's. The Exmoor National Park housing requirement figure (400 dwellings for the 20-year period 2006- 2026 or, 20 dwellings per annum) was calculated on the same basis as those provided for other LPA's, which was based on previous levels of delivery. The only difference was that because of its rural nature and the overall strategy of directing future growth towards the larger urbanised centres/LPA, the housing requirement for the National Parks and predominantly rural LPA's, were not set much higher than past trends in housing completions for their respective areas. Whilst the emerging RSS and its predecessor, known as RPG 10 [50 Department of Transport, Local Government and the Regions and, Government Office for the South West; Regional Planning Guidance for the South West (RPG 10); H.M.S.O.; 2001; ISBN 0 11 753603 2], were revoked in May 2013 [51 H.M. Government; Town and Country Planning, England: The Regional Strategy for the South West (Revocation) Order 2013- Statutory Instrument 2013 No.935 (S.I.2013:935); op. cit.], the provisions of paragraphs 17 and 47 of the NPPF [52 Department for Communities and Local Government; National Planning Policy Framework- March 2012; op. cit.; p.5 &amp; pp.12- 13.] make it clear that all LPA's are expected to have an up-to-date understanding of the housing markets that affect them and how this translates into a figure of objectively identified housing need, which they are expected to plan for.</p>

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Mr Martin Wilsher West Somerset District Council	7.8 dlp893 General Comment	Based on the data provided in this paragraph, the housing requirement of the former, emerging RSS for the period 2006- 2026 was 400 dwellings for the Exmoor National Park or, an annualised rate of 20 dwellings per annum [53 Government Office for the South West; The Draft Revised Regional Spatial Strategy for the South West Incorporating the Secretary of State's Proposed Changes- for Public Consultation, July 2008; op. cit.]. This would suggest that over the period 2006/7 to 2011/2, the number of completions within the National Park was 133 dwelling units. When compared with the average trajectory for the RSS reporting period of 100 [54 Exmoor National Park Authority; Exmoor National Park Annual Monitoring Report 2009/10 (Table 6.6); Exmoor National Park Authority; 2010; p.36], this would suggest that the National Park is currently over-providing, in spite of the difficult economic conditions being experienced in the housing market generally in the last five years.
Mr Martin Wilsher West Somerset District Council	7.20 dlp894 <b>Object</b>	Use of the data is misleading in relation to the sale of affordable housing units within the National Park and the use of the monies by registered Providers on schemes outside of the National Park. Units are only sold off if there is no locally identified on-going need for the property and, no people who meet the existing criteria in the adopted Local Plan [55 Exmoor National Park Authority; Exmoor National Park Local Plan (Including Minerals and Waste Policies) 2001- 2011)- Adopted 2005: Written Statement; op. cit.; pp. 72- 73.] have made a bid to be re-located to it. Registered Providers in West Somerset have a responsibility throughout the whole of the Local Authority area not just the National Park element. Funding decisions will usually be made to favour those locations where the need for affordable housing is greatest and where it can be used to implement a project quickly. These criteria will generally be found to be met in the larger settlements outside of the National Park.
Mr Barney Simmons Somerset Rural Youth Project	7.21 dlp174 Support - subject to amendments	Generally sympathetic to the needs of local people on lower incomes - including young people. ENP should provide evidence and lobby for an increase in council tax for second home owners - the increase being used to support the construction of affordable housing and to support the local economy.
Mr Martin Wilsher West Somerset District Council	7.23 dlp895 <b>Object</b>	The text in these paragraphs acknowledges the differences in house-prices inside and outside of the National Park but does not provide an explanation as to why this is. It recognises that this discrepancy makes the prospects of being able to live in the National Park as less affordable than similar properties outside. The average house price inside the National Park in 2012 is quoted as :£392,555 [56 Exmoor National Park Authority; Exmoor National Park Annual



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		House Price Survey 2012; Exmoor National Park Authority; 2012; p.5], whilst the update to the West Somerset Strategic Housing Market Assessment (West Somerset SHMA), quotes a figure for an equivalent property outside of the National Park as :£223,460 [57 Housing Vision; Strategic Housing Market Assessment: West Somerset Update, Final Report- November 2013; West Somerset Council; 2013; p.97]. Given the National Park's adopted strategy of restricting housing supply to open-market conversions in key settlements and proven local needs affordable housing, this has obviously had an impact on the demand for housing with the National Park due to its perceived desirability and, a consequential effect on the price of open-market housing for sale. This has had a knock-on effect on the open-market property that is within the National Park that has been purchased and is then rented out, pushing open-market rents higher in order to cover the cost of the mortgage used to purchase the housing. The changes to definitions of what is regarded as an affordable rent to 80% of open-market rent [58 Department for Communities and Local Government; National Planning Policy Framework, Annex 2: Glossary-March 2012; Department for Communities and Local Government; 2012; ISBN 978 1 4098 3413 7; p.50], has meant that even properties rented out at this level are unaffordable to most local people. The text needs to reflect this more clearly and how the Local Plan will seek to address this anomaly.
Mrs Christine Fitzgerald Porlock Parish Council	7.24 dlp561 General Comment	We feel that the household income level is unrealistic for this area- many households will have a far lower level of income. As only a low number of affordable homes are proposed to be built we are in danger of losing traditional local building skills over the years which will further impact employment in this area. The size of affordable homes is unrealistic.
Mr Martin Wilsher West Somerset District Council	7.24 – 7.25 dlp896 – dlp897 <b>Object</b>	See comment ID dlp895 above
Mrs Christine Fitzgerald Porlock Parish Council	7.26 dlp563 General Comment	Rental levels and affordability Rental levels for Porlock are not affordable. There should be a greater number of 1 bedroom properties available especially in view of government legislation on the number of bedrooms.
Mr Martin Wilsher West Somerset District Council	7.26 – 7.28 dlp898 – dlp900 <b>Object</b>	See comment ID dlp895 above

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Mr Martin Wilsher West Somerset District Council	7.29 dlp901 General Comment	There is a danger that the Local Plans strategy and policies, as being expressed in this paragraph, will only encourage a pastiche style of development in design terms. This will reflect a very narrow timescale of the evolution of the landscape and the architectural character of Exmoor.
Mr Martin Wilsher West Somerset District Council	7.30 dlp902 General Comment	West Somerset Council is a partner in the Somerset Choice-Based Lettings scheme which enables people seeking affordable housing to be 'bid' for such properties that become available from Registered Providers. People are categorised according to their need. As the scheme is county-wide, terms like 'waiting-list' and 'register' are no longer deemed relevant or appropriate.
Mr Martin Wilsher West Somerset District Council	7.30 – 7.41 dlp903 – dlp914 <b>Object</b>	The picture concerning how the National Park intends to deal with housing need across its Local Planning Authority area is confused and lacks a consistency of approach. The NPPF requires in paragraphs 17 and 47 [61 Department for Communities and Local Government; National Planning Policy Framework- March 2012; op. cit.; p.5 & pp.12- 13], all LPA's to establish the objectively identified housing need for their area for the duration of the Local Plan (minimum of 15 years). The data and projections arising from this process should inform the LPA as to the type and tenure of housing likely to be required over the timescale and the probable origins of the need that underpins it. An element of this will be the likely need generated by the existing, indigenous population for both open-market and affordable housing. In particular, it is essential for LPA's to identify what the latter quantum is likely to be so that it can be managed and planned for utilising the development plan process. The National Park appears to have had an update done on the Strategic Housing Market Assessment (SHMA) for the West Somerset element of its area, but no elements of this have been made available. For the North Devon element of the National Park, it has relied on the update commissioned by North Devon and Torridge District Councils in 2012 [62 Housing Vision; Strategic Housing Market Assessment: Torridge and North Devon Update Final Report- December 2012; Torridge District Council; 2012]. This latter document does not identify the quantum of affordable housing need in the North Devon element of the Exmoor National Park as a separate figure. It is subsumed within a more general figure for the Exmoor & Downland Fringe sub-area that was identified in the original SHMA for the Northern Peninsula [63 Housing Vision; Strategic Housing Market Assessment for the Northern Peninsula; Northern Peninsula Housing Market Partnership; 2008]. The text in para. 4.34 claims that the update identifies a figure of 427 affordable homes being required in that part of the National Park covered by the update. Both the updates covered the same 20-year period (2011- 2031) and used the same data sources in order to establish the figures for the respective areas that cover

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		<p>the National Park. The absence of a clear affordable housing need figure for the North Devon element and, therefore, a total for the whole of the National Park, will make it difficult for the LPA to plan effectively to meet the future demands for affordable housing in its area for the duration of the Local Plan. The text suggests that for the Devon element of the identified need for the Exmoor National Park, this will be met and provided outside of the LPA area in the rest of North Devon. Tables 7.1 and 7.3 of the North Devon and Torridge SHMA Update [64 Housing Vision; Strategic Housing Market Assessment: Torridge and North Devon Update Final Report- December 2012; op. cit.; pp.244 &amp; 245] show that between 49.01% and 53.16% of the future housing need for North Devon will be for 'social rent' affordable housing, and for the Exmoor &amp; Downland Fringe sub-area [65 Housing Vision; Strategic Housing Market Assessment: Torridge and North Devon Update Final Report- December 2012, Table 7.7; op. cit.; p. 247] the latter proportion applies. This would suggest that over half of the future housing need in the North Devon part of the National Park is likely to come from households with the lower levels of income. The LPA's solution is that if these people are employed or, need to provide family/social care to relatives, they would have to commute-back/travel into the National Park, thus increasing pressure on their limited financial resources and inhibiting their ability to move-up the housing tenure ladder. It would also, generate patterns of movement that would conflict with the National parks sustainability principles. The text seems to suggest that the Local Planning Authority will address meeting the housing requirement in the Somerset element of the National Park as and when it arises. This seems to conflict with the purpose of development plans and the NPPF's expectation that it plan to meet and manage the future demand over the timescale of the Local Plan rather than respond to it. Paragraph 47 of the NPPF makes clear that all LPA's should plan to have a minimum of a five-year housing land supply and there are no exceptions to this. The Local Plan (para.7.41) claims that the National Park Circular provides the National Park Authority with exemption from this requirement. However, this document makes it clear that it is only in relation to, 'the statutory purposes, management and other matters' but, no mention of planning. As the NPPF post-dates the Defra Circular, it forms the latest Government statement in respect of policy and in particular planning policy.</p>
Mr Andrew Austen North Devon Council	7.32 dlp859 Support	It recognises the 2008 Northern Peninsula SHMA with recent updates and that the strategic housing need for Exmoor NP within North Devon will be met outside the National Park.

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Mr Martin Wilsher West Somerset District Council	7.42 dlp915 General Comment	The text mentions that the National Park has a very high proportion of people who are self-employed but no figure or source is provided to substantiate this claim. This should be provided or, the statement deleted. The reference to average self-employed person earning 14% less than their employee-employed equivalent was obtained from an article published by the Centre for Economic Business Research [66 Centre for Economic and Business Research; Self-employed face highest debt burden; in - Centre for Economic and Business Research; Step Change Consumer Debt and Money Report Q3 2012; Step Change Debt Charity; 2012; pp.9-10].
Mr Richard Webber Shearwell Data Ltd	7.46 dlp664 General Comment	If this situation continues [see comment dlp663] even the young applying for local housing needs will be driven away. Not only is there a limit on the size of house which allows no vision for the applicant to invest in but the present situation is unworkable as banks and lenders will not take the risk of being landed with a house that cannot be sold on. Perhaps a solution can be found by persuading banks to lean on the Government loan backed guarantee scheme to help?
Mrs Molly Groves Exmoor Uprising	7.50 dlp873 General Comment	A three bedroom wooden house or bungalow is affordable on the low wages paid on Exmoor. It is insulated to minus 20 DEGREES including fitted kitchen and bathroom and all wiring and electric and TV and phone plug, for £70 to £80,000. PLUS £8,000 GROUNDWORK. One bedroom ones from £30,000. for parents to move into and make way for children, but be near their families because AMENITIES ARE IN THE TOWNS, SO CHILDREN CAN TAKE THEIR CHILDREN AND PARENTS CAN HELP WITH THE CHILDREN BY FERRYING THEM TO NURSERY SCHOOLS WHILE THEIR PARENTS ARE AT WORK. IAN LIDDELL GRANGER'S CONSULTATION SHOWED ABOUT £80,000 WAS ABOUT THE AFFORDABLE PRICE FOR WORKERS. 1. Have a basic general MAXIMUM size to the plot, WITH ROOM TO PARK AND A GARDEN and set it at a certain Locally Affordable price. This LAND PRICE must be TIED TO THE PRICE IN PERPETUITY. Even if the plot is larger than normal it must remain within the financial price range of that range of sized houses. 1A. These houses can only be sold or let on to local working people. The longer they have lived in the area over 10 years the more brownie points to be considered. 2. Choose an INSULATED to minus 20 wooden house completely fitted out with kitchen, bathroom and electrics for £70,000 plus complete. 3. Lay hard core for standing. 4. Anything added to the site must either be included in the same price, or carefully removed before selling on. i.e. If Self building a wood and galvanise workshop. 5. Build a garage later on when you can afford it. BEARING IN MIND IT MUST STILL be sold under the LOCAL AFFORDABLE HOME UMBRELLA. So don't spend too much money. A PERCENTAGE LIMIT MUST BE MAINTAINED.

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		Then you would have a truly Affordable home for an Exmoor working person which could be sold on at a Truly Affordable Price to another local at a later date.
Marlene Allinson Cutcombe Parish Council	7.53 dlp295 <b>Object</b>	Concern is expressed at the '... not exceeding 90sqm in size' restriction for affordable needs housing, as it is felt that in a rural area many workers are self-employed, e.g. in agriculture, and require space to store their tools, trailers and necessary equipment for their work, and 90sqm does not allow for adequate storage space, nor would it happily accommodate a growing family.
Colin Savage Exmoor, North Devon and West Somerset Rural Housing Project	Strategic Housing Policies dlp298 Support	On behalf of the Rural Housing Project I have supported the broad response made to the housing policies in the Draft Local Plan by the West Somerset Council Affordable Housing Group. Having contributed throughout the evolution of the draft housing policies I offer my support to the approach covered by these policies. In order to conserve the landscape of the National Park building development needs to be kept to a minimum, and the approach of only allowing local needs affordable housing meets that objective.
Mrs Molly Groves Exmoor Uprising	Strategic Housing Policies dlp877 General Comment	2. Whether mobile or permanent, we have to start thinking OUTSIDE THE BOX. If a house can come partially built or prefabricated or in two halves complete on lorries then they should be given credence and given earnest consideration. a. We have the original type of large caravan mobile, where most young couples started next to a family member. BUT TRAVELLERS STILL CAN HAVE CARAVANS. APPARENTLY IT IS THEIR HUMAN RIGHTS. ISN'T IT ABOUT TIME Exmoor people had HUMAN RIGHTS. b. In America you see complete houses being carried miles across country so why can't this be done in this country. c. If this sort of arrangement was plots of land need not be permanent housing, they could be for the full or temporary use and the house could be sold separately if wished This would probably some form of GROUND RENT ON THE SITE NOT FULL PURCHASE. d. Any sale of the adjacent land by the owner would keep the leasehold land for the site until the Lessee left and the house was moved and sold on. MORE EFFORT IS NEEDED FOR THE ERECTION OF SINGLE HOMES IN REMOTER AREAS WHICH LACK FAMILY AMENITIES. e. Single homes 'Exmoor locally tied' could be erected to a local to rent but the same ration of cost and rent would have to apply. f. People who can afford £350,000 should not be considered Exmoor Local Working People Affordable. They can afford to buy on the open market. IS IT TRUE THAT PEOPLE MIGHT BE ALLOWED TO BUILD OPEN MARKET HOUSES IF THEY GIVE AWAY TWO PLOTS FOR LOCAL HOUSING. If that is so then local people could afford to build wooden, prefabricated homes of their own with all local ties applying.

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Mr Martin Wilsher West Somerset District Council	7.56 dlp916 <b>Object</b>	<p>The text seems to suggest that the Local Planning Authority will address meeting the housing requirement in the Somerset element of the National Park as and when it arises. This seems to conflict with the purpose of development plans and the NPPF's expectation that it plan to meet and manage the future demand over the timescale of the Local Plan rather than respond to it. Paragraphs 17 and 47 of the NPPF [67 Department for Communities and Local Government; National Planning Policy Framework- March 2012; op. cit.; p.5 &amp; pp.12- 13] make it clear that all LPA's have to establish the objectively identified housing need for their area for the duration of the Local Plan (minimum of 15 years). The data and projections arising from this process should inform the LPA as to the type and tenure of housing likely to be required over the timescale and the probable origins of the need that underpins it. Paragraph 47 of the NPPF also makes clear that all LPA's should plan to have a minimum of a five-year housing land supply and there are no exceptions to this. The Local Plan (para.7.41) claims that the National Park Circular provides the National Park Authority with exemption from this requirement. However, this document makes it clear that it is only in relation to, 'the statutory purposes, management and other matters' but, no mention of planning. As the NPPF post-dates the Defra Circular, it forms the latest Government statement in respect of policy and in particular planning policy. By not fulfilling these requirements of the NPPF, the National Park Authority does not appear to have a strategy in respect of housing.</p>
Mr Christopher Adams	7.57 dlp241 General Comment	<p>AFFORDABLE HOUSING. Within the draft local plan affordable housing does get mentioned in some detail. There is one glaringly obvious omission that can make the reader wonder how thorough the whole paper is and this is the best use of land and properties within the boundary of Exmoor National Park, in particular the Exmoor National Park Headquarters at Dulverton. Exmoor House could be converted, or developed, to offer affordable accommodation on Exmoor in a village that offers full facilities and good routes of communication. The adjacent Caravan Club site could be relocated to the outskirts of the village. This would avoid access problems for large vehicles and caravans that have to negotiate the bridge or narrow streets. The existing Caravan Club site could be developed to offer affordable accommodation on Exmoor in a village that offers full facilities and good routes of accommodation. It is difficult to see how Exmoor NP can justify the retention of Exmoor House. It is unlikely that all the staff using the building are resident within the immediate area and administrative, management, professional and clerical staff do not, in these days of instant data transfer, need to be located on Exmoor. Unlike the requirement for workshops, four wheel drive vehicles, trailers etc. etc. that are essential for work on Exmoor by the Exmoor NP why not relieve the pressure on the Exmoor housing situation by relocating the Exmoor Park HQ to one of the towns or villages on the outskirts of the national park? These</p>

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		suggested developments would be beneficial to all seeking affordable housing, and to the village of Dulverton, and, possibly, to the overall efficiency of the National Park administration. Has Exmoor NP ever undertaken a feasibility study to indicate the potential for such development? I can find no mention of this within the Exmoor Draft Local Plan.
Mr Martin Wilsher West Somerset District Council	7.57 dlp917 <b>Object</b>	See comment ID dlp916 above
Mr Martin Wilsher West Somerset District Council	7.58 dlp918 <b>Object</b>	See comment ID dlp916 above
Mrs Heather Crockford West Somerset District Council	7.59 dlp598 General Comment	Single bedroomed accommodation: General: There is a growing need for smaller and 1-bedroom accommodation and a lack of existing affordable supply to meet this need. This imbalance should be mentioned in the Local Plan. The re-lets analysis shows there were only six 1-bed general needs lettings from 2010/11 to 2012/13.
Mrs Heather Crockford West Somerset District Council	7.59 dlp603 General Comment	Housing Supplementary Planning Document: The West Somerset Affordable Housing Group would welcome the publication of the proposed Exmoor Housing SPD as soon as is practical after the adoption of the Local Plan and would be happy to provide any assistance required during its formulation. For example, guidance on design standards (e.g. Lifetime Homes, floor spaces, Code for Sustainable Homes, etc.); defining social rent, intermediate rent & self-build; calculating financial contributions under policy HC-S4.
Colin Savage Exmoor, North Devon and West Somerset Rural Housing Project	7.62 dlp301 General Comment	Wherever possible housing needs to be designed to high levels of sustainability and energy efficiency, and being able to be adapted to meet the changing needs of occupants is essential when only limited amounts of housing can be provided. This does not necessarily need housing to have to comply with specific standards such as 'Lifetime Homes' or the 'Code for Sustainable Housing' as these are not always 'rural proofed' and better standards may develop through the period of the local plan. The underlying principles of these standards are, however, a useful starting point.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Marlene Allinson Cutcombe Parish Council	7.64 dlp297 <b>Object</b>	Para 7.64 p134 'Additionally, . . . time.' Concern is expressed that Registered Housing Providers will be allowed to 'exercise their own discretion' about the eligibility of occupants and that 'planning permission is unlikely to be required' should such housing providers purchase and create new housing units through subdivision. Why would planning permission not be required? Would the 10-year residency rule still apply or could they 'exercise their discretion' and move in tenants without this residency requirement and perhaps who would, therefore, not be classed as 'local'?
Mrs Jean Armin Carhampton Parish Council	HC-S1 dlp280 Support	Two members of Carhampton Parish Council attended your recent Consultation event and made a report at the December Council meeting. They were particularly impressed with the new emphasis on affordable housing, including in small communities, and the prioritising of specialist housing for the vulnerable and for rural workers. It was noted that this would require the new Plan to be more flexible on housing in general to allow the provision of affordable housing. I have been asked to write commending these aspects of the Plan, and to offer the Council's support for your work. Thank you for giving us the opportunity to have an input in this matter.
P.J. Jackson	HC-S1 dlp368 Support	2. Affordable housing appears to have fallen aside over recent years but with the help of the National Park and other authorities, assistance for truly affordable property is welcomed.
Alan Morgan	HC-S1 dlp399 Support - subject to amendments	4. Housing: I agree almost entirely with the housing plans set out in the document and with the need for affordable housing in the ENP.  I do think however that price reductions should be funded by a government body not by using the profits from open market sales. The latter option would seem like rigging the market and possibly be contrary to EU rules and leave the authority open to later litigation particularly if a US company was involved in some way with the transactions.
Mrs Christine Fitzgerald Porlock Parish Council	HC-S1 dlp562 General Comment	Floor Space HC-S1 4(b) Children (especially in this area) are unable to afford homes of their own and are continuing to live at home with their parents well into adulthood. The size of affordable homes does not meet the social needs of a modern family structure.



Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mrs Margaret Rawle	HC-S1 dlp626 Support	Support local needs Affordable Housing allowing some open market housing in the Main Settlements e.g. Dulverton and welcome the stipulation that Principal residence should be a condition.
Mr Andrew Austen North Devon Council	HC-S1 dlp860 Support	For the principal housing need being for identified local housing needs, as defined, with new housing of a size, type and tenure to meet the needs of Exmoor's communities. This complements the strategic open market housing need for Exmoor being met outside the National Park.
Susan Green Home Builders Federation	HC-S1 dlp758 General Comment	<p>The Viability Assessment Study dated October 2008 by the University of the West of England is out of date and pre-dates the requirements for whole plan viability testing as set out in the NPPF. An up-dated Viability Assessment should be carried out as soon as possible. If the Exmoor Draft Local Plan is to be compliant with the NPPF, the Council needs to satisfy the requirements of Paragraphs 173 and 174 whereby development should not be subject to such a scale of obligations and policy burdens that viability is threatened.</p> <p>The Council should be mindful that it is inappropriate to set unachievable policy obligations. Under Paragraph 174 of the NPPF the Council must properly assess viability. A whole plan viability assessment would include testing Policy HC- S1 Housing 4b) housing standards and 4c) Lifetime Homes.</p>
Mrs Heather Crockford West Somerset District Council	HC-S1 dlp593 Support - subject to amendments	HC-S1 2(d) - Extended Family Dwellings Response Point: The concept of facilitating the delivery of 'Extended Family Dwellings' in certain specified circumstances is welcomed in principle. Any binding mechanism to secure occupation should not be so onerous as to prevent delivery of such accommodation.
Mrs Heather Crockford West Somerset District Council	HC-S1 dlp602 Support - subject to amendments	<p>Policy HC-S1 4(c): Ensuring that new residential development meets the Lifetime Homes standard. Whilst the Group supports this idea in principle, there are some serious concerns.</p> <p>There is currently a need for smaller units including single bedroomed accommodation to address the imbalance in the existing stock of affordable housing, however, it is not feasible to achieve the Government definition of Lifetime Homes for single bedroomed homes. There are also questions regarding the viability impact of delivering affordable dwellings to the Lifetime Homes standard. It is however possible to achieve the principles of lifetime homes whilst avoiding the often expensive and rigid 'tick box' approach of the standard itself by using innovative design. Registered Providers are happy to share appropriate examples with ENPA. Clarification is required within the Plan as to what will be the driver- the affordable housing or the Specialist Principal Residency accommodation. There is also a question about how the</p>

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
		design and sale of specialist accommodation will work in practice if it is not being specifically designed to meet the needs of particular families or individuals.
South West HARP Planning Consortium	HC-S1 dlp754 General Comment	We consider clause 4c's expectation that all new affordable homes are built to comply with the Lifetime Homes standard to be unnecessary and another burden to affordable housing delivery. The Government has indicated its intention to withdraw various standards and its future aspirations for achieving higher levels of the Code for Sustainable Homes across all types of residential development and replace them with enhanced building regulations instead. The Council should take this into consideration when reviewing this policy as the Plan progresses.
The Crown Estate	HC-S1 dlp777 Support - subject to amendments	The Crown Estate acknowledges that the local housing market within Exmoor does not reflect the income of those living and working locally. The current situation is both socially and economically unsustainable, with lower paid workers often forced to commute into the district and unable to find homes in the communities they grew up in. A lack of affordable housing weakens community networks and makes access to essential services more difficult. With many households still in need of affordable housing TCE accepts that the provision of affordable homes should remain a priority over the coming years. The present planning policy in Exmoor requires all new build housing developments to be affordable in order to meet local needs. Although the aim of this policy has been to increase the supply of affordable housing, it does not take account of issues surrounding the financial viability of such schemes. This is particularly relevant during difficult economic times when government funding has been cut and such a restrictive policy will actually serve to constrain the delivery of affordable housing. The economic downturn has had a major impact on the ability of land owners and developers to support the level of affordable housing required by Local Planning Authorities. In order to ensure that housing needs are deliverable over the coming years it will be important for the Local Planning Authorities to take a flexible approach which takes account of the financial viability of individual developments. TCE is supportive of the housing policy's aims to help meet the local housing needs of the area and maintain and improve the housing stock suitable for local residents. They are satisfied that tying the property to persons that meet local occupancy criteria is a practical way of doing this. TCE feels that to continue with the status quo will only serve to constrain the delivery of affordable housing over the coming years and will lead to more and more local people being displaced because they cannot afford to live locally. Although there is some provision within Policies HC-D1, HC-D2 and HC-S2 for the approach of cross-subsidising, it is not consistent with the wording of this (HC-SC1) policy.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
		<p>Whilst they recognise that the need for housing in the area is predominantly for affordable houses, and are anxious that this need be fulfilled, they are reticent about the policy only allowing new build housing where it is affordable as they fear that this will stymie all development as a result of it being unviable. Where market housing (though still tied as 'Principal housing') is allowed it could facilitate the provision of affordable units as a form of cross-subsidy. TCE would encourage the NPA to look further at a proportion of non-affordable housing to be provided, where required, to achieve a viable development scheme. In this way, developments that might otherwise be unviable and thus undeliverable under current planning policy restrictions would be able to fund the affordable housing element of the scheme through cross subsidy.</p>
Mrs Molly Groves Exmoor Uprising	HC-S1 dlp871 General Comment	<p>THE discussion for AFFORDABLE HOUSES SOLUTION IS: - WE HAVE TO START PLANNING and THINKING OUTSIDE THE PRESENT BOX!!!! ROWS OF STONE AND CEMENT HOUSES IN VILLAGES ARE NOT WHAT IS NEEDED, BECAUSE THEY JUST GO TO PEOPLE FROM OUTSIDE WHO DON'T WANT TO LIVE IN SMALL EXMOOR VILLAGES IN THE FIRST PLACE. Young local couples with no children stand no chance of getting one of these houses Building company houses. WHAT IS NEEDED IS ONE OR POSSIBLY TWO BUILT FOR PEOPLE WHO WANT THEM AND CAN AFFORD TO HAVE WOODEN ONES. THEY CAN CHOOSE THEIR HOME ACCORDING TO THE PRICE RANGE. YOUNGSTERS AND OLD PEOPLE NEED TO HAVE CHEAP TO RUN, COMFORTABLE HOMES, WITH A BIT OF GARDEN. THERE IS A 5 YEAR PLAN COMING UP AND EXMOOR VERY LOCAL YOUNG AND OLD PEOPLE WISH TO BE ABLE TO REMAIN IN THEIR VILLAGES. Near their families. WE HOPE OUR IDEAS COULD BE CONSIDERED IN THIS PLEASE.</p> <p>RULES. Affordable homes for local Exmoor working people are now considered to be a serious necessity. It is suggested some form of graph or table as to size of plot, house, length of time in village or nearby etc., and extras to be devised. 1. A. Ratio of costs of homes. B. Rules for basic cost of small wooden houses. C. Ratio for larger wooden houses. D. Costs for terrace or semi for £110,000 E. Costs for terrace or semi or detached up to £200,000 D. Consider wider scope beyond forestry and agriculture, such as local plumber, carpenter or other service to the community employment. Emphasis on LOCAL. E. Local to be construed ratio wise. Born and bred, born, 25 years 15 years down to 10 years. These buildings must be tied irrevocably TO RESALE TO Exmoor local working people for a price of the original costs plus an annual cost of living and housing percentage of local labour wages. Type and therefore cost of building. This must be written in concrete.</p>
Mr Ross Simmonds English Heritage South West	HC-S2 dlp708	We support this policy and the inclusion of criterion e & f.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
	Support	
The Crown Estate	HC-S2 dlp778 Support	TCE is pleased that the NPA have adopted the approach of supporting conversion of listed buildings and buildings of locally significant historic or architectural interest for residential use. TCE has a number of buildings that are significant in these respects and are keen to ensure that they remain in use and preserved for future generations. Many of the properties are redundant or disused due to the building no longer meeting the requirements of its original use (often in relation to farming, where practices have changed markedly in recent years and, as result, requires modern buildings that better meet the needs of commercial, successful farming). These buildings are now in danger of falling into disrepair and it is important to safeguard them for future generations. In many instances the only viable mode of conversion is to residential use. TCE is therefore pleased at the inclusion of this policy. They are also encouraged that the NPA is realistic in its approach to the provision of affordable units in that they are subject to viability considerations as the cost of conversion, and particularly for listed buildings, is often too high to make affordable provision realistic.
Mr Martin Wilsher West Somerset District Council	7.68 dlp919 <b>Object</b>	LPA is making unreasonable demands on the applicant by insisting that they use the named organisations only for the production of a survey to support their proposal for a new affordable dwelling unit that meets the LPA's 'Local Occupancy Criteria'. Such a stipulation could be subject to legal challenge. Suggest that a model questionnaire is drafted that potential applicants could use.
Mr Martin Wilsher West Somerset District Council	7.69 dlp920 <b>Object</b>	The expectation in the text of this paragraph is that other land/property-owners will be willing to agree to have assets considered in this way.
Mr Martin Wilsher West Somerset District Council	7.71 dlp921 General Comment	Text appears to be missing from the start of this paragraph which makes it difficult to comprehend or put in context.
Mr Martin Wilsher West Somerset District Council	7.76 dlp922 <b>Object</b>	The National Park Authority is a Local Planning Authority only. The paragraph suggests that it is attempting to behave like a Local Housing Authority (LHA) which is not its function. The suggestion that the extant LHA's could and should provide information relating to individual incomes and other matters could have legal implications particularly in respect of data protection [68 H.M. government; Data Protection Act 1998, Chapter 29 (as amended); H.M.S.O.; 1998].

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mrs Molly Groves Exmoor Uprising	7.76 dlp875 General Comment	IN FUTURE ANY HOUSES TO LET ON EXMOOR MUST BE DECIDED BY THE Local Parish council and not some load of builders with boxes to tick. Due to the fact that houses are being decided by the Building company's representatives, you couples in nearby villages who applied at Cutcombe could not get one. BUT SURELY THIS WAS THE ORIGINAL RATIONALE FOR BUILDING THEM, FOR LOCAL EXMOOR PEOPLE WHO WORK ON EXMOOR TO HAVE HOMES ON EXMOOR.
Dr Duncan Jeffray Exmoor Society	HC-S3 dlp417 Support	We are happy with the retention of existing strict Local Occupancy Criteria as set out in policy HC-S3.
Marlene Allinson Cutcombe Parish Council	HC-S3 dlp294 <b>Object</b>	Concern is expressed at the inflexibility of the Local Occupancy Criteria, in particular the 'minimum period of 10 years permanent and continuous residency in the parish . . . ' (p139 para 1 a) and would like to see some leeway on this policy with regard to key workers and also the building of local, affordable needs housing being allowed by employers for renting by their key workers. Also the Parish Council was happier with the wording 'ten out of twenty years . . .' rather than 'ten years permanent and continuous . . .' so that there is flexibility.
Mrs Heather Crockford West Somerset District Council	HC-S3 dlp595 Support - subject to amendments	The introduction of an additional level of Cascade allowing for a 5 year local connection for re-lets where there are no identified local people in need meeting the 10 year local connection standard, is welcomed. However, it would be more helpful in bringing forward affordable housing investment if the policy were to be worded: 'Where properties are vacant' rather than 'Where properties become vacant' in order that a 5 year local connection can be used for the first letting of properties as well as for re-lets. Registered Providers had hoped for a greater level of flexibility and an inability to use this cascade on first let is likely to reduce the number of affordable dwellings they are able to deliver. For example: at Exford, a housing needs assessment identified 29 applicants as having the relevant 10 year connection, yet once the scheme had been developed, the Registered Provider struggled to allocate the 9 dwellings.
Mrs Heather Crockford West Somerset District Council	HC-S3 dlp597 General Comment	Policy HC-S3- Para 1 (c) Clarification is required as to whether the reference to 'adjoining parish' includes adjoining parishes outside the Exmoor National Park boundary.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
The Crown Estate	HC-S3 dlp779 Support - subject to amendments	<p>The above policy is aimed at ensuring that housing provision can meet local needs and not contribute to the large proportion of holiday/second homes within the Park, and prevent the over-inflation of housing prices due to wealthy retirees migrating to the area. TCE commend the approach adopted by the authority.</p> <p>The only reservations the Crown Estate has is if there are no local persons satisfying the criteria the property may remain empty and unoccupied. They appreciate the concession made in criteria 6 to then extend the occupancy cascade to local persons with a minimum 5 years of permanent and continuous residence in the parish or adjoining parish or with strong local ties to the relevant district council area of the National Park, or the National Park as a whole, but recommend that this policy is monitored for its effectiveness to ensure that it does not result in unoccupied dwellings, which would go against its intended purpose.</p>
Mr Martin Wilsher West Somerset District Council	7.84 dlp923 <b>Object</b>	Unclear as to how 'Principle residence Housing' will be monitored and enforced, especially when a property is sold on.
Colin Savage Exmoor, North Devon and West Somerset Rural Housing Project	HC-S5 dlp299 Support	Allowing principle dwelling open market housing only where this is needed to facilitate that affordable housing provides a practical mechanism for aiding delivery of small housing schemes. Wherever possible the Rural Housing Project will aim to lead on delivery of such schemes, by working with communities to identify housing needs, including local principle dwelling needs, and identifying suitable land and developer partners. This approach avoids the uncertainties of leaving delivery to private developers, and is likely to ensure that the maximum local needs housing is delivered with the minimum principle dwelling housing.
Dr Duncan Jeffray Exmoor Society	HC-S5 dlp418 Support	We support Policy HC-S 5 designed to ensure that any open market housing required to enable the delivery of affordable housing, by cross subsidy, must be 'principal residence' housing.
Mr Martin Wilsher West Somerset District Council	HC-S5 dlp924 <b>Object</b>	Negatively worded policy. If it is to be proceeded with suggest; 'Open market housing will only be permitted where it can demonstrate it is essential in order to enable the delivery of '
Mr Andrew Austen North Devon Council	HC-S5 dlp861 Support	Any market housing required to enable the delivery of affordable housing being 'principal residence' housing to restrict its use for second and holiday homes.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mr Philip Griffin	HC-S5 dlp373 <b>Object</b>	Provision should be made for a local person who is not in housing need but wants to improve their situation and is in the position to build a house within the local service centres/villages as their principal residence, without having to provide affordable housing.
Mr Philip Griffin	HC-S5 dlp374 General Comment	The provision for affordable housing should have a certain amount of flexibility because the amount of land/buildings suitable for development is limited. So in two different service centres/villages have a principal residence in one and affordable housing in another. To encourage the use of renewable energy. A provision should be included for a passive house as a principal residence for a local with no ties attached.
Mrs Heather Crockford West Somerset District Council	HC-S5 dlp599 Support - subject to amendments	General support is expressed for the Principal Residence Clause policy, however, clarification is needed as to who, the National Park Authority envisages, will deliver these 'principal residence' market dwellings? The input of private developers on the draft policy is also important. It is highly likely that this type of housing will be delivered by private developers rather than RPs.
Mrs Margaret Rawle	HC-S5 dlp794 Support	Support local needs Affordable Housing allowing some open market housing in the Main Settlements e.g. Dulverton and welcome the stipulation that Principal residence should be a condition.
Mr James Wilmoth	HC-S5 dlp670 General Comment	The policy should be broadened to allow people with a proven local connection to the National Park to build a house for their own use despite not needing 'affordable' housing. For example, someone who currently lives and works in the Park and has their own capital to enable them to build a house. The link to it being their principal residence is a good idea. The flexibility to allow market housing to enable the delivery of local affordable housing is a good development, but should not necessarily mean having to provide the affordable housing on the same site or indeed in the same village. As long as the link can be made between the market housing and the affordable, it shouldn't matter where they are located. Somebody building a house for their own use with all the expense of meeting the sustainable requirements etc. will not necessarily want the affordable housing right next door. Indeed the demand for the affordable housing may not be in that locality. For example, if the market house were to be built in Wootton Courtenay, why not provide the affordable unit(s) in Porlock where there may be demand for them?

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
South West HARP Planning Consortium	HC-S5 dlp755 Support - subject to amendments	We support the recognition this gives to the practical difficulties of delivering affordable housing in the current economic climate, including the limited grant now coming through (especially in rural areas) via the Government's Affordable Homes Programme. The opportunity to provide a small amount of market housing provides a welcome source of cross subsidy which can ensure viability of a development. This is very much encouraged by the NPPF and for that reason we do not see why the Council should not be more overt about its intention and refer explicitly to cross-subsidy in the policy text. The remainder of this policy is satisfactory and the principal residency restriction is supported as another means of controlling affordability.
The Crown Estate	HC-S5 dlp780 Support	As has been previously outlined in this response, TCE is supportive of the NPA's aims to reduce the number of holiday/second homes to allow the housing market to more adequately meet the needs of the local residents. The policy also ensures that there is a knock-on economic benefit from having more full-time residents within the Park and contributing to the local economy.
Mr Martin Wilsher West Somerset District Council	7.85 dlp925 <b>Object</b>	Text talks of a housing capacity of the settlements but the source is not identified. It is difficult to assess if a capacity does exist when the Proposals Map and accompanying settlement inset maps do not show any form of development limits or identify specific sites for development. These issues need to be clarified (see comments re. Proposals Map, above). It is assumed that the 333 new-build housing figure derives from the Landscape Sensitivity Study [69 Paul Bryan-Landscape Planning; Landscape Sensitivity Study - Exmoor National Park Authority 2013; Exmoor National Park Authority; 2013.] that forms part of the evidence-base for the Local Plan. There is concern over the inconsistency in which this has been applied. The text in the paragraph suggests that the application of the sensitivity testing has been applied to all the named settlements in the plan whilst the methodology itself reveals that only the 22 named locations in the adopted Local Plan were assessed [70 Paul Bryan- Landscape Planning; Landscape Sensitivity Study - Exmoor National Park Authority 2013: Methodology; Exmoor National Park Authority; 2013]. Also, the application of the testing was restricted to impact within the settlements rather than taking account of the potential land adjoining them.



Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mrs Pamela Scragg Old Cleeve Parish Council	7.85 dlp654 General Comment	There is a need to make consistently clear throughout this Local Plan that the 'capacity' for development identified in the Landscape Sensitivity Study is 'landscape capacity' only, as the study itself makes explicit. Although this is clear in some paragraphs, in others it is not, especially where reference is made to 'overall capacity'. A solution for the present paragraph would be to insert 'in landscape terms' after 'each settlement'. Thereafter, it would be helpful to make consistent use of the term 'landscape capacity' rather than just 'capacity' when referring to this study (see paragraphs 5.18, 5.146, 5.148, notes 273 and 309, paragraphs 7.85, 11.224, and table 11.2, including main heading). NB reference in note 57 has the wrong date and reference in note 146 has the wrong title and date.
Mr Martin Wilsher West Somerset District Council	HC-D1 dlp926 <b>Object</b>	Policy makes reference to extant legislation and could conflict with the provisions in the Development Management Procedure Order [71 H.M. Government; Town and Country Planning, England: The Town and Country Planning (Development Management Procedure) (England) Order 2010- Statutory Instrument No.2184 (S.I.2010:2184) (as amended); The Stationary Office; 2010]. This should be relocated to the supporting text and clarification provide as to the relationship between the two.
Brig. David Godsall Winsford Parish Council	HC-D1 dlp623 General Comment	Policy HC-D1 is comprehensive. All applications must be examined on a case by case basis with consideration of local need and not simply be required to meet all clauses without consideration. These are policies not laws.
Marlene Allinson Cutcombe Parish Council	7.89 dlp296 <b>Object</b>	Para 7.89 p143 'This Plan continues the approach in settlements of seeking all new build housing to be affordable housing to meet local needs.' Concern is expressed that this policy means that a successful person cannot aspire to build his own house with the ENPA's boundaries.
Mrs Heather Crockford West Somerset District Council	7.94 dlp600 General Comment	7.94 (Page 144) states 'To be consistent with this policy (which requires that, where principal residence market housing is proposed as a part of a scheme which will be owned or controlled by a Registered Provider, it will be the minimum number required to deliver the affordable housing), the National Park Authority will expect that the number of affordable homes will be greater than the number of market dwellings.' There is a concern by the group that this will encourage schemes being contrived on a 51%-49% basis.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mr & Mrs David & Wendy Cook	HC-D2 dlp378 General Comment	We believe there should be a relaxing of the current planning regulations which would allow people like ourselves to downsize on their existing property. We purchased in 1979 with the plan in mind to build a smaller house on the property in our later years. In doing so it would release funds from our original property to help look after our retirement in the same position in the village we chose in 1979.
Mrs Jill Jones	HC-D2 dlp427 <b>Object</b>	Middle income families, be they from the area or new to Exmoor, are important for the long term economic and social health of the community. The 'second home' market has made it more difficult for these people to live on Exmoor. I think the balance should be actively redressed.
Brig. David Godsall Winsford Parish Council	HC-D2 dlp624 General Comment	Whilst the concept of affordable housing is fully supported we feel there needs to be more encouragement of additional market housing within the Park - probably around the main population centres rather than in villages - because additional population would mean more customers for local businesses etc...
Mrs Margaret Rawle	HC-D2 dlp795 Support	Support local needs Affordable Housing allowing some open market housing in the Main Settlements e.g. Dulverton and welcome the stipulation that Principal residence should be a condition.
South West HARP Planning Consortium	HC-D2 dlp756 Support - subject to amendments	We are again supportive of the policy but would reiterate the same point as above, that the term cross subsidy is more common place and should be used in this instance. We hope to see all of the above issues rectified in the publication version when it is issued for public consultation.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
The Crown Estate	HC-D2 dlp781 Support	TCE acknowledges that there is a significant shortfall in the supply of affordable homes across Exmoor and is pleased to see that the provision of affordable housing continues to be a priority for the NPA. To address this issue will require a concerted effort from all those involved in house building and so TCE welcome the policy which states that all new residential development will be expected to contribute towards the provision of affordable housing. It is however essential that affordable housing policy requirements give due consideration to development viability as well as need. In this regard TCE appreciates the inclusion of point 2 which explains that a minimum amount of market housing will be permitted in order to allow development to be viable in terms of delivering affordable units. This approach will ensure that developments, which might otherwise be unviable and undeliverable will be able to fund the affordable housing element of the scheme through cross subsidy. Previous arguments in relation to housing previously made still stand.
Mrs Heather Crockford West Somerset District Council	HC-D3 dlp601 General Comment	Clarification is required on the following aspects of the policy: How will 'an identified need for specialist housing' be assessed? What is the definition of 'Specialist Housing' in terms of this policy? Regarding affordable housing owned by RPs, there is already a supply of Specialised Extra Care Housing and Sheltered Housing across the National Park, some of which is currently being de-commissioned due to a lack of need. Such accommodation also requires revenue funding in order to maintain the service. This is becoming harder to secure with Somerset County Council currently reducing the budget. Again, the Group would ask that the existing supply situation is fully taken into account. The re-lets data is broken down between general need and sheltered/supported housing [data supplied regarding ENPA Re-let Summaries: 2010-11 to 2012-13]. Clarification is required that this type of specialist housing could be Principal Residence (Market) Housing provided by private developers and in what circumstances - e.g. to help deliver affordable housing. The Affordable Housing Group would like an acknowledgement within the Policy HC-D3, that Specialist Housing may be required, not only by the elderly or vulnerable people requiring care and assistance but also by young people who require support to develop life skills to enable them to live independently.
Mr Ross Simmonds English Heritage South West	7.117 dlp710 Support	HC-D5 We support this policy and the inclusion of criterion e.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Nell Cruse Somerset County Council	7.117 dlp363 <b>Object</b>	HC-D4 and HC-D5 The Council does not support encouraging new residential in the countryside in isolation (i.e. without a business use or community service). This creates an unsustainable situation and is likely to increase the need for vehicular trips.
Mr Ross Simmonds English Heritage South West	HC-D4 dlp709 Support	We support this policy and the inclusion of criterion f.
Nell Cruse Somerset County Council	HC-D4 dlp356 <b>Object</b>	The Council does not support encouraging new residential in the countryside in isolation (i.e. without a business use or community service). This creates an unsustainable situation and is likely to increase the need for vehicular trips.
The Crown Estate	HC-D4 dlp782 Support - subject to amendments	<p>The inherent costs involved in converting a traditional building will usually mean that a conversion to an affordable home is unviable. TCE is therefore pleased to see that the National Park Authority now recognises that there are some circumstances whereby affordable housing may not be appropriate or achievable, but where allowing the conversion of the building could bring other benefits. Furthermore allowing a proportion of residential conversions to non-affordable dwellings could fund the provision of affordable dwellings elsewhere on the site through cross subsidy or through the provision of developer contributions towards affordable housing in other areas of the National Park. Rather than simply viewing residential conversions to market housing as a missed opportunity for affordable housing the National Park Authority should recognise the economic benefits associated with such conversion schemes. Residential conversions provide the basis for a broad spectrum of enterprises that do not require commercial or industrial facilities or infrastructure as required by the planning system. With improving access to broadband, there is considerable evidence from national and regional research that home-working is growing in terms of its potential for rural communities and economies.</p> <p>However, TCE feel that this policy is over-restrictive and does not accord with national policy. The Framework states at paragraph 55 that new isolated homes in the countryside are permitted where the development 'would re-use redundant or disused buildings and lead to an enhancement to the immediate setting'. Whilst it is acknowledged that this policy also deals with non-residential buildings in the open countryside that are not necessary redundant or disused, TCE feels that there should be a criterion within the policy which allows for development along these lines and which would be in accordance with national policy. In all other respects TCE are satisfied with the requirements of this policy.</p>

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Paul Cottington National Farmers Union (South West)	HC-D6 dlp284 Support	Policy HC-DC6 is crucial to enable the development of many farms and enable succession.
Mr Ross Simmonds English Heritage South West	HC-D6 dlp711 Support	We support this policy.
Colin Savage Exmoor, North Devon and West Somerset Rural Housing Project	HC-D7 dlp300 Support	The draft housing policies also provide means of delivering other housing requirements such as succession in farming which have been identified through community consultation by both the National Park and by the Rural Housing Project.
Mrs Susan May Exmoor Trust	HC-D7 dlp318 Support	I was particularly pleased to see and hear that planning rules are going to allow the re-use of redundant traditional 'old' farm buildings, in an effort to allow succession farm dwellings which in turn will encourage younger members of farming families to be able to live at their place of work. These buildings also possibly being converted into business properties, housing, holiday lets or even recreational use.
Mr Ross Simmonds English Heritage South West	HC-D7 dlp712 Support	We support this policy and the inclusion of criterion I.
The Crown Estate	HC-D7 dlp783 Support - subject to amendments	The Crown Estate is supportive of this policy in principle but would caution that in most cases it is likely to prove to be financially unviable without some form of cross subsidy.  Such a scheme is therefore more likely to be successful if one or more other buildings on the farmstead were converted for market housing which could then fund the dwelling for the retired farm worker.
Suzie Sinden	HC-D8 dlp242 Support	Also buildings can be adapted to house members of the expanding family, or elderly relative.
Mr Ross Simmonds English Heritage South West	HC-D8 dlp713 Support	We support this policy and the inclusion of criterion b & e.
Mrs Heather Crockford West Somerset District Council	HC-D8 dlp594 Support - subject to amendments	Policy HC-D8 - Extended Family Dwellings The concept of facilitating the delivery of 'Extended Family Dwellings' in certain specified circumstances is welcomed in principle. Any binding mechanism to secure occupation should not be so onerous as to prevent delivery of such accommodation.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mrs Molly Groves Exmoor Uprising	HC-D8 dlp874 General Comment	At the same time consider ONE BEDROOM BUNGALOWS THAT PARENTS CAN RETIRE TO IN THE GARDEN OF FAMILY HOMES. IN THE OLD DAYS MOBILE HOMES WERE THE ANSWER. WHEN THESE WERE REFUSED IT TOOK A LAYER OF FAMILY LIVING OUT OF THE EQUATION. Consideration should be given to allowing these again.
Mr Ross Simmonds English Heritage South West	HC-D11 dlp714 Support	We support this policy.
Mr Ross Simmonds English Heritage South West	HC-D12 dlp715 Support	We support this policy and the inclusion of criterion b.
Mr Ross Simmonds English Heritage South West	HC-D13 dlp716 Support	We support this policy.
Mr Ross Simmonds English Heritage South West	HC-D14 dlp717 Support	We support this policy.
Mr Ross Simmonds English Heritage South West	HC-D15 dlp718 Support	We support this policy.
Mr Russell Vowles	HC-D15 dlp413 <b>Object</b>	Whilst I agree strongly with the attempt in this policy and others to realise more 'affordable' homes on Exmoor, this policy attempts to achieve this by ensuring that the size of any replacement dwelling is not 'materially' or 'substantially' larger in terms of net floor area than the building it replaces. Of course in many cases a limitation on the size of a replacement dwelling is sensible to avoid inappropriate massing of a development on an unsuitable site, but I believe this aspect should I believe be unlinked from the attempts to ensure affordable housing supply. My view is that in many cases the draft wording of HC-D15 may have a detrimental effect on the replacement of dwellings and the supply of housing (affordable or otherwise) over the coming years. Below I attempt to explain my rationale for this. 1/ An existing dwelling to be replaced comes with its own domestic curtilage which in many cases will be relatively large. This alone would mean that the replacement dwelling, however small, would still have a relatively high (not affordable) open market value. Under such circumstances the policy fails completely to achieve its aim and has the side effect that it may be uneconomic for a developer or self-builder to replace some dwellings that are coming to the end of their natural life. The result could be that some of the poorly built, aesthetically poor smaller

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
		<p> dwellings in the park do not get replaced and over time fall into a state of disrepair. If this happens be no one benefits. It is in everyone's interest to see all the scarce housing within the ENP to be in use and of a good standard. 2/ The number of replacement dwellings in the park likely to be built will be small over the coming years but the circumstance described in 1/ above could occur relatively often if the policy is adopted as written. There are examples across the park of dwellings built in the early 1950s that are near the end of their life due to their construction method (e.g. poorly executed timber frame) that cannot be refurbished either for economic reasons or due to the materials used for construction (e.g. asbestos). Many such buildings are small and were built at low cost in a time when domestic space expectations were lower and land was cheap. These dwellings often have a reasonably substantial domestic curtilage able to sustain a larger building without inappropriate massing or detriment to the surrounding area. Development of a larger (but appropriate) dwelling on such a site would I would make sense if that is needed in order to make replacement economic. In some cases a larger building may fit the domestic curtilage and surrounding area better than an undersized building designed only to meet the not 'substantially' or 'materially' larger test proposed by this policy. 3/ In some cases the dwelling to be replaced will be substantially larger than that considered likely to be affordable. In this instance the policy as written does not help achieve more affordable housing in the park as it permits a replacement as large as the building it is replacing. Whilst this may be reasonable, I argue that due consideration should be given to the appropriateness of the replacement. It may be better under such circumstances to encourage development of two (or more) affordable dwellings rather than one relatively large replacement dwelling. In summary, I feel this policy falls short in its attempt to achieve affordable housing in the park and at the same time may have negative economic impacts. I argue that the policy needs to reflect the fact that it may not be possible in all cases to force creation of affordable housing by simply limiting net floor area of replacement dwellings and that attempting to do so may simply prevent replacement or force inappropriate design decisions. </p> <p> My suggestion is that the policy should instead contain the following elements: Re-state the aim of creation of affordable housing- it is important. Acknowledge the fact that affordable housing cannot be economically achieved on all replacement dwelling sites due to: Size of the domestic curtilage (low density of development) Size of the existing dwelling (it is already large) Where an existing dwelling is small (&lt;90sqm net) allow replacements to be considered up to the existing net area excluding extensions +30% (Rationale: Under existing permitted development rights the building could be extended by 30% so it would be better to allow an economic larger dwelling up to this size rather than to force say 70sqm which would in many </p>

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		<p>cases would not be economic to develop. The economics of single small builds on expensive land is challenging.) Where the existing dwelling is &gt;90sqm net but &lt;160sqm net allow development of a replacement which is no greater than 117 sqm net or the net size of the existing dwelling, whichever is larger. (Rationale: Too small to be divided into two or more affordable dwellings, but avoids creation of much larger dwellings. 117 sqm is 90 sqm +30%. This may help creation of new reasonably sized family homes whilst preventing enlargement of already substantial dwellings.) Where the existing dwelling exceeds 160sqm net expect that due consideration has been given to division of the site to create two or more replacement affordable dwellings. Permit replacement up to the net floor space of the existing dwelling if division is inappropriate. State that permission for replacement dwellings that exceed the net floor area of the existing building will only be given where the developer has taken significant steps to lower the energy use of the building to meet or exceed the energy efficiency standards prescribed by the Code for Sustainable Homes Level 5, AECB Gold or PassivHaus standards. Rationale: a) The affordability of a home is not just related to its size and purchase or rental cost. Long term running costs have a significant effect. Across Somerset levels of fuel poverty are high. Achieving the above standards would reduce energy use compared to the average UK home by around 80% and make use of the dwelling more viable to low income families. This is especially so across much of the ENP where natural gas is not an option for heating. b) This is in line with the wider sustainability aims and policies of the ENP local plan and carbon reduction policies. c) Opportunities for building replacement in the National [Park] are limited so where they exist efforts should be made to ensure the long term sustainability and viability of such buildings.</p>
Mrs Molly Groves Exmoor Uprising	HC-S6 dlp876 General Comment	TRAVELLERS ARE GIVEN PRIORITY AND SPECIAL SITES. THEY ARE EVEN BEING GIVEN £600 EACH TO MOVE TO ANOTHER SITE IN SOMERSET STILL IN THEIR CARAVANS. Why can't your born and bred local Exmoor working people have the same opportunities? Something is seriously wrong somewhere.
Alan Morgan	Community Services and Facilities dlp401 Support	5. Community Assets: This section has been well thought through and I am in agreement with all the main arguments in the plan.
Mr Oliver Reynolds Nettlecombe Parish Council	HC-S7 dlp676 Support	
Mr Oliver Reynolds Nettlecombe Parish Council	HC-D16 dlp677 Support	



Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
P.J. Jackson	HC-D17 dlp372 General Comment	5a. The benefit of a Public Library providing information and advice is said to be useful as an outlet to many people.
Gary Parsons Sport England	HC-D17 dlp309 Support - subject to amendments	3. Protection of Sport & Recreation including playing fields Policy GP2- Presumption of Sustainable Development page 37 para 4.11 Policy HC-D17 Safeguarding Local Service & Community Facilities pages 271/275 para 7.211-7.220 Sport England acknowledges that the NPPF is promoting 'sustainable development' to avoid delays in the planning process (linked to economic growth). That said, the NPPF also says that for open space, sport & recreation land & buildings (including playing fields) paragraph 74: Paragraph 74. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: - an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or - the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or - the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss. Sport England would be very concerned if any existing playing pitches would be affected by these proposals without adequate replacement in terms of quality, quantity, accessibility, management & maintenance and prior to the loss of the existing facility. Sport England's Playing Field Policy 'Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of, all or any part of a playing field, or land last used as a playing field or allocated for use as a playing field in an adopted or draft deposit local plan, unless, in the judgement of Sport England, one of the specific circumstances applies.' Reason: Development which would lead to the loss of all or part of a playing field, or which would prejudice its use, should not normally be permitted because it would permanently reduce the opportunities for participation in sporting activities. Government planning policy and the policies of Sport England have recognised the importance of such activities to the social and economic well-being of the country. Sport England opposes such developments in all but exceptional cases, whether the land is in public, private or educational use. It is our policy to oppose development on playing fields unless at least one of the five exceptions as set out in our policy are met: E1 'A carefully quantified and documented assessment of current and future needs has demonstrated to the satisfaction of Sport England that there is an excess of playing field provision in the catchment, and the site has no special significance to the interests of sport.' E2 'The proposed development is ancillary to the principal use of the site as a playing field or playing fields, and does not affect the quantity or quality of pitches or adversely affect their use.' E3 'The proposed development affects only land incapable of forming, or forming part of,

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		<p>a playing pitch, and does not result in the loss of, or inability to make use of any playing pitch (including the maintenance of adequate safety margins), a reduction in the size of the playing area of any playing pitch or the loss of any other sporting/ancillary facility on the site.' E4 'The playing field or playing fields which would be lost as a result of the proposed development would be replaced by a playing field or playing fields of an equivalent or better quality and of equivalent or greater quantity, in a suitable location and subject to equivalent or better management arrangements, prior to the commencement of the development.' E5 'The proposed development is for an indoor or outdoor sports facility, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss of the playing field or playing fields.'</p> <p>The Exmoor National Park Local Plan should reflect National Planning Policy regarding protecting sport facilities for indoor and outdoor sport.</p>
Mr Ross Simmonds English Heritage South West	HC-D18 dlp719 Support	We support this policy.
Mr Oliver Reynolds Nettlecombe Parish Council	HC-S7 dlp676 Support	
Gary Parsons Sport England	7.198 dlp305 General Comment	<p>Sport England is the Government agency responsible for delivering the Government's sporting objectives. Maximising the investment into sport and recreation through the land use planning system is one of our priorities. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields. The new Sport England Strategy 2012-17 sets a challenge to: - See more people taking on and keeping a sporting habit for life - Create more opportunities for young people - Nurture and develop talent - Provide the right facilities in the right places - Support local authorities and unlock local funding - Ensure real opportunities for communities Sport England has assessed the Local Plan in the light of Sport England's Planning for Sport: Forward Planning guidance. A copy can be found on our Planning for Sport section of the website <a href="http://www.sportengland.org/facilities-planning/planning-for-sport/">http://www.sportengland.org/facilities-planning/planning-for-sport/</a> The overall thrust of the statement is that a planned approach to the provision of facilities and opportunities for sport is necessary, new sports facilities should be fit for purpose, and they should be available for community sport. To achieve this, our objectives are to: PROTECT sports facilities from loss as a result of redevelopment ENHANCE existing facilities through improving their quality, accessibility and management PROVIDE new facilities that are</p>

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		fit for purpose to meet demands for participation now and in the future. Sport England believes that sport has an important role in modern society and in creating sustainable and healthy communities. Sport and physical activity is high on the Government's national agenda as it cuts across a number of current topics that include health, social inclusion, regeneration and anti-social behaviour. The importance of sport should be recognised as a key component of development plans, and not considered in isolation.
Brig. David Godsall Winsford Parish Council	QUESTION 1 dlp622 General Comment	Please add the green area surrounding the car park in the middle of the village, which includes the tree planted in 2012 for The Diamond Jubilee.
Brig. David Godsall Winsford Parish Council	7.224 dlp621 General Comment	The 3 areas marked as Important Visual Amenity Space are private property, 2 are very untidy; one totally overgrown and owned by someone in Bristol; the other has plant and other vehicles. We have no control over either.
Mike Highfield Somerset County Council	7.236 dlp272 Support	Unfortunately neither the NPPF, or later explanatory information provide objective guidance on how to demonstrate if a development is a change for the better, or gives rise to what might be considered an acceptable environmental impact. The NPPF stipulates (10) that 'plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas'. I consider the Exmoor Plan has provided good opportunity to stress the importance of protecting tranquillity (2.3-1, 5.169, 6.91, CC-S3.f, CC-D4.d, 6.173, 9.7, 9.9, 9.10, RT-D4.2d, 9.78) and consider noise impact from development (CE-S8.h, CE-S9.2a, CE-D5.c, CC-D6.b, 6.157, 6.173, 6.175, 7.236, 8.42, 9.87).
<b>SECTION 8 – ACHIEVING A SUSTAINABLE ECONOMY</b>		
Mr Bruce Nottrodt	8 dlp146 Support - subject to amendments	Objectives 1 and 5 predicate against economic development and should be moderated so as not to be used as an overwhelming reason against economic development
Alan Morgan	8 dlp400 Support	6. The Economy: The need for more employment and business opportunities in The Park is well described and the means of encouraging this is very sensible. It is a difficult task succeeding in this area without adversely [affecting] the ENP aim but the plans offer a good route to achieve this.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mr Roger White	8 dlp406 Support	I support the Draft Policy Plan as a whole. The reinstatement of the railway supports the plan objectives of building a sustainable economy via tourism and employment for businesses supplying and catering for services within the Park. The development of the railway is a spur to improve off-road accessibility for tourist activity helping to reduce traffic congestion in busy areas and promoting walking and cycling with safety for all.
Mr Ross Simmonds English Heritage South West	8 dlp720 Support	We support the reuse and alteration of traditional buildings in this context and the management of that process.
Marlene Allinson Cutcombe Parish Council	8 dlp292 General Comment	Section 8: Achieving a Sustainable Economy This is a relatively short section (pp 182-196) and we are surprised that, given the importance of the subject in the Exmoor National Park, Agriculture is only allocated two paragraphs on p 193 although there are other references to Agriculture in the document, especially since 8.12 states 'This section of the Plan covers some key issues ...'. The Woodlands and Forestry section is somewhat larger occupying a couple of pages.
Mr Richard Webber Shearwell Data Ltd	8 dlp663 General Comment	Policy 8 Objective 14 A great deal more understanding of the applicant's business funding of an application to sustain and create jobs needs to be taken into account by committees. Having spent two and a half years working up a project to sustain 65 jobs and create 50 more and also investing £150k to get to the point of the planning meeting, our application was rendered unworkable due to the committee applying a section 106 agreement on top of 42 special conditions. Not only has the action of the committee made the application impossible to carry on but has also endangered the existing jobs. At no time was a section 106 agreement mentioned or proposed in the two and a half year period before the planning meeting. In our opinion this shows a clear lack of understanding of how our project was to be funded. A previous local application for the livestock market allowed additional open market housing to be granted to fund the project. In our case no reference had been made to funding. The lesson should be learnt by members that 106 agreements can kill employment in National Parks and drive jobs away. It may well be that individual members have never had to run their own business and so may not be aware. If this situation continues even the young applying for local housing needs will be driven away. Not only is there a limit on the size of house which allows no vision for the applicant to invest in but the present situation is unworkable as banks and lenders will not take the risk of being landed with a house that cannot be sold on. Perhaps a solution can be found by persuading banks to lean on the Government loan backed guarantee scheme to help?

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mr Barney Simmons Somerset Rural Youth Project	8.1 dlp175 General Comment	ENPA needs to support transport initiatives that allow people to work within the local economy given the diminishing levels of support for public transport. These should be aimed at the less affluent members of society - particularly the old and the young.
Mrs Corinne Matthews West Somerset District Council	8.7 dlp609 General Comment	Consider adding to this paragraph the average cost of housing, to provide some more contextual information in relation to the lower than average earnings figure. Therefore whilst unemployment levels might be low, quality of life based on earnings capability is also low. Coupled with high house prices, it is a very challenging environment to retain young people within the boundaries of the National Park. I would like to see some more information in relation to the definition of 'seasonal' and whether this is being applied to the land based season, tourism season or both? The high proportion of 'self-employment' could be masking the fact, that many people are under-employed, or employed within the 'black economy'.
Mrs Corinne Matthews West Somerset District Council	8.8 dlp610 General Comment	Whilst I would not disagree that tourism has an important role within the Exmoor economy- that much of the employment depends on this sector is an inherent economic risk. As stated in para 8.7 the jobs tend to be low paid and seasonal. As stated elsewhere in the Plan, many of these businesses are 'Life Style' so do not tend to employ those outside of the family. An over reliance on the tourism economy is of particular risk in the case of (say) a further outbreak of Foot & Mouth and the vagaries of the weather (especially wet summers)
Mrs Corinne Matthews West Somerset District Council	8.10 dlp611 General Comment	Very glad to see that encouraging employment opportunities for young people remains a priority- but to enable this to happen we need to encourage economic growth within the National Park area.
Marlene Allinson Cutcombe Parish Council	8.10 dlp293 General Comment	The Parish Council is concerned that the National Park may struggle to implement the policies as outlined in this section despite 8.10 stating 'The ENP Partnership Plan supports strong elements of the existing economy, such as tourism and farming, whilst encouraging new business opportunities where they can benefit and contribute to the special environment of the National Park.'
Mrs Corinne Matthews West Somerset District Council	8.12 dlp612 General Comment	Very much in favour of 'flexible, criteria based policies' that will be responsive to changing circumstances in relation to re-use of brown field sites / redundant buildings et al.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
P.J. Jackson	8.18 dlp371 General Comment	5. Conserving the local environment means that many jobs of work will be undertaken by small numbers of people after an explanation of work required has been explained. Some of who are receiving financial benefits during a period when other employment is not possible.
Mrs Corinne Matthews West Somerset District Council	8.24 dlp613 General Comment	Whilst recognising that inappropriate expansion of business premises, leading to increased traffic, detrimental impact on landscape character etc. is an issue within a protected landscape, I would strongly recommend that this is balanced with the economic need. For example, relocation of a business from a central location on Exmoor to the outskirts of a market town could have significant impact on the local community it moves from in terms of job losses. The other likelihood (especially on the Somerset side of the NP) is that the business would be lost to the District, and relocated closer to motorway junctions at Bridgwater and Wellington, having an even wider impact on the local economy.
Mr Bruce Nottrodt	SE-S1 dlp147 Support	Should wording be included to enable the rebuilding of the railways through what could be deemed to be open countryside?
Mr Ross Simmonds English Heritage South West	SE-S1 dlp721 Support	We support this policy.
Mr Andrew Austen North Devon Council	SE-S1 dlp862 Support	Policy to strengthen, enhance and diversify the Exmoor economy with full consideration given to re-use of existing traditional buildings or well related to existing buildings.
The Crown Estate	SE-S1 dlp784 General Comment	This wording of this policy is unclear. It suggests that business or employment development will be required to meet all the principles listed a) - e). It is suggested rewording to; 'where they are consistent with at least one of the following principles'. It is also noted that most of the points within the policy are repeated in subsequent policies in this section and, for the purpose of clarity, it is suggested that where this occurs the points should be removed from this policy.
Mr Ross Simmonds English Heritage South West	8.29 dlp723 Support	We support this policy along with the text at Para. 8.29.
Mr Ross Simmonds	SE-S2	We support this policy along with the text at Para. 8.29.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
English Heritage South West	dlp722 Support	
Mr Andrew Austen North Devon Council	SE-S2 dlp863 Support	Policy to strengthen, enhance and diversify the Exmoor economy with full consideration given to re-use of existing traditional buildings or well related to existing buildings.
Hugh Thomas Greater Exmoor Shoots Association	8.34 dlp324 <b>Object</b>	<p>We note that our role (that of GESA) has been marginalised in the latest draft plan by comparison with its precursor. We would respectfully suggest that the growth of this sector of the Exmoor economy has been noticeably greater than in any other area, and that ours is entirely without public funding (distinguishing Game Shooting from farming or tourism in general). (Even in Exford, the economic contribution (inter alia to hotels and B&amp;B) is significant by comparison with the popular concept of equestrian activity.) Some of the comments are grudging or lack an understanding of the advantages of game shooting to the National Park and the surrounding country.</p> <p>The comments on diversification at paragraph 8.34 do not mention that this enterprise is unusual in providing a direct subvention of funding for the farmer or landowner from a secondary use of the land without displacing other traditional land uses and without substantial investment or permanent change to the land or built environment. This is a very strong benefit of game shooting activity.</p>
Mrs Corinne Matthews West Somerset District Council	8.35 dlp615 General Comment	I have some concerns about how the viability of a farm is assessed in terms of what ratio of farm diversification activity is considered acceptable in planning terms. Small farm sustainability is often knife-edge. The principle of applying ties to existing buildings on a farm where diversification activity is taking place, could be a major barrier to future investment and leverage of additional capital.
Paul Cottington National Farmers Union (South West)	SE-S3 dlp285 Support	Policy SE-S3 will enable farms to diversify their incomes and create sustainable enterprises.
Mr Ross Simmonds English Heritage South West	POLICY SE-S3 dlp724 Support	We support this policy.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
The Crown Estate	POLICY SE-S3 dlp785 <b>Object</b>	<p>The wording of this policy is unclear and overly complex. It is suggested that the policy should be re-worded: '1. Proposals for business development in the open countryside will be permitted where: a) the scale and appearance of the development are acceptable; and b) they involve the re-use of existing buildings; or c) proposals are well-related to an existing group of buildings.' The remainder of the clauses within criterion 1 of this policy are unnecessary as they re-iterate policies contained elsewhere within the Plan and do not bring any additional clarity. TCE also wishes to make the following remarks: Given the obvious rural nature of the National Park it is perhaps unsuitable to constrain new build development to be solely within local service centres and villages. The on-going decline in employment within agriculture has meant much of the local population and those that live in these rural communities are having to travel long distances to reach their places of work which are generally outside of the National Park, within larger settlements. Not only is this unsustainable but it also means that life for rural communities is affected by a downward spiral in terms of economic activity and an increasing change from formerly vibrant rural communities to dormitory settlements providing increasingly expensive housing for non-indigenous house purchasers.</p> <p>Strong rural communities offer those living in rural areas better opportunities to work in their local community. They help reduce the level of out-migration of young people and retain skilled young people by providing more and better quality local employment opportunities. Being able to live and work in the same settlement, or at least close by, will also have sustainability advantages as it will reduce the need for people to travel long distances to their place of work. Criteria 3 of this policy states; 'The erection of new business premises or business use in buildings which stand alone or which do not relate well to existing buildings and are not part of a farm group or hamlet will not be permitted.' TCE would argue that businesses that are viable within the rural setting of the Park and which satisfy all other policies contained within the plan should not be constrained in this way. There may be circumstances where a location, which is well suited and screened, is appropriate for new build development – or indeed already has an existing building/s which are suitable for business use but not related to other built form. TCE would encourage the NPA to consider what material and demonstrable harm would come from locating or relocating a business to an existing building – albeit one not well related to other built form, or part of a farm group or hamlet – when it could bring considerable economic benefit to the local population and help retain a balanced and mixed population. The Crown Estate would also remind the NPA that The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2013 deemed development consisting of a change of use of a building and any land within its curtilage from use as an agricultural building to a flexible use class as permitted development.</p>



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		<p>Therefore in many instances this policy would not accord with the thrust of national legislation. TCE oversees many farms and agricultural tenants and is therefore fully aware of the difficulties experienced by traditional farming enterprises within and surrounding the National Park. The lack of stability in incomes and the problems experienced by farmers in recent years has caused many to either leave the business completely, or to seek additional and supplementary income from diversifying. Farm diversification has become an important part of the rural economy in a number of ways; it allows farms that would otherwise have had to go bankrupt or sell-up to continue farming with these businesses as a form of subsidy, it also stimulates the rural economy and helps to create additional jobs for local residents. Diversifying allows them peace of mind that they are not reliant on a single, inconsistent and unreliable source of income. There are examples of successful rural businesses, borne out of necessity, where farm diversification has brought new life to an existing farming enterprise. In these cases there is a need to understand and appreciate their value to the local economy and to foster appropriate further growth and development to build upon that success.</p> <p>TCE would therefore welcome a policy that is less restrictive to the development of such schemes and which is also set out in a simpler and more coherent way.</p>
Mrs Corinne Matthews West Somerset District Council	8.40 dlp616 General Comment	Having held a 'Home working' focus group recently, we learnt that Home workers suffer from isolation / lack of structure / lack of opportunity to network and collaborate / lack of organisation. The positives included flexibility / creativity. If home working is to be further encouraged, then so does the creation of Rural Work Hubs that can be used by Home Workers to over-come some of the issues cited by them, and help support the viability and growth of their business activity.
Mike Highfield Somerset County Council	8.42 dlp273 Support	Unfortunately neither the NPPF, or later explanatory information provide objective guidance on how to demonstrate if a development is a change for the better, or gives rise to what might be considered an acceptable environmental impact. The NPPF stipulates (10) that 'plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas'. I consider the Exmoor Plan has provided good opportunity to stress the importance of protecting tranquillity (2.3-1, 5.169, 6.91, CC-S3.f, CC-D4.d, 6.173, 9.7, 9.9, 9.10, RT-D4.2d, 9.78) and consider noise impact from development (CE-S8.h, CE-S9.2a, CE-D5.c, CC-D6.b, 6.157, 6.173, 6.175, 7.236, 8.42, 9.87).

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
The Crown Estate	SE-D1 dlp786 <b>Object</b>	<p>The CEC are disappointed to see that the NPA has chosen to have a home working policy that is so limited in scope. The Local Planning Authority has given no consideration to the possibility of converting existing buildings to a live/work arrangement nor made any reference to new build live/work schemes that could be (where viable) affordable and/or tied as a 'Principal residence'. The approach taken in SE-D1 fails to recognise the importance of key changes taking place in the way we live and work. For example it does not take account of the fact that a growing number of people are now working from home, particularly in rural areas. In fact according to the 2001 census 31% of people in Exmoor work from home, this is a significantly greater percentage than the national average. This suggests that consideration should be given to the issue of home working and live-work units when forming those planning policies that will shape the future of the National Park. This could be particularly important in those villages that are more remote and have more restricted local employment opportunities. Fuelled by the impact of new technology (such as improved internet access in rural areas), a growing frustration with the stress and time wasting associated with the daily commute and a desire for a better work/life balance, self-employed people in rural areas are increasingly choosing to opt for home-working. In fact this is now a well-established trend. The CEC own a significant number of traditional buildings which are well suited to providing this type of live-work arrangement. The conversion of rural buildings to establish a live-work arrangement offers a wide range of benefits, not only to individuals and their businesses, but also to the wider economy and environment as well. In November 2010 the Trade Union Congress (TUC) published an analysis of average commuting times in the UK. This analysis found that the average time spent commuting to and from work increased year on year from 1998 to 2006 when it reached a peak of 52 minutes 36 seconds per day. Since 2006 however average commute times have decreased every year and at the time these findings were published the average commute time stood at 47 minutes 48 seconds per day. The TUC attributes this gradual reduction in commuting times partly to the growth in home working. Between 2006-2008 the number of people working from home increased by 291,000 which actually accounted for more than half of employment growth during this time period. With approximately 25 million people in the UK commuting to work, it is estimated that commuting costs approximately £337 million of potential work time every day. Therefore one opportunity to help rural businesses deliver far more for the local economy is through the promotion and enabling of home-based work. The table below shows that a greater proportion of people in Devon work 'mainly at or from home' than in the south west region and England as a whole [Means of Travel to Work - Devon Local Profiles - South West Observatory 2012].</p>

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
		Home working is therefore clearly a highly significant factor in the local economy and is a trend that the NPA should support. Over recent years the principle of live-work units within the countryside has become more acceptable as a means of promoting the sustainable re-use of existing buildings. Such schemes are inherently sustainable as they help to meet local demand for housing (socially sustainable) and they provide local employment opportunities (economically sustainable). They also serve to reduce the need to travel by car and safeguard the character and appearance of traditional buildings (environmentally sustainable). This type of development is specifically supported within paragraph 21 of the Framework which states that local planning authorities should 'facilitate flexible working practices such as the integration of residential and commercial space within the same unit'. The NPA is therefore strongly urged to extend policy SE-D1 to support this form of development within Local Plan.
Mr Christopher Adams	8.47 dlp240 General Comment	INTENSIVE AND SEMI-INTENSIVE FARMING. Usually large agricultural machines that exist on Exmoor are used for the production and harvesting of grass or cereals. All too often there are indications on Exmoor of agricultural practices that are to the detriment of wildlife e.g. crop spraying and mowing fields for silage by way of cutting from the outside of the field towards the middle rather than cutting from the middle towards the outside. On Exmoor, over the past twenty years, there have been several instances of the removal of hedgerows that could be described as redundant hedgerows or semi-redundant hedgerows. Although the benefit of such habitat is well known perhaps the reason given for the removals is the space needed for large machines and intensive or semi intensive ruminant production. Frequently it is difficult to find justification for the presence of intensive and semi-intensive farming on Exmoor when this negates the potential for wildlife and acts to the detriment of tourism by reducing the natural ambience of the Exmoor scene. Has Exmoor NP sought expert advice on the potential benefits that could be achieved by reversing the impact of apparent current policies that lead to the apparent encouragement of farming practices that are detrimental to tourism, wildlife and the environment? I can find no indication of this in the draft local plan.
Paul Cottington National Farmers Union (South West)	8.47 dlp281 Support	The Local Plan is clear and has a good understanding of the issues and opportunities facing agriculture. It fully recognises the importance of agriculture on the economy, landscape, environment and communities of Exmoor.
Mr Ross Simmonds English Heritage South West	8.59 dlp725 Support - subject to amendments	We support the recognition of the historic farmsteads and the link, at Para. 8.59, to policy CE-S4, which could be usefully mentioned in policy SE-S4.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mr Christopher Adams	SE-S4 dlp238 General Comment	AGRICULTURAL BUILDINGS. Agricultural buildings have, over the last twenty years, become more noticeable. Large buildings to house livestock or machinery have become noticeable blots on the Exmoor landscape. Bearing in mind the livestock is invariably ruminant which, by their existence, lead to the creation of most of the 'greenhouse gasses' on Exmoor. Has Exmoor NP instigated a full survey to clearly define all the benefits and faults of their apparent policy of encouraging intensive and semi-intensive ruminant livestock farming on Exmoor? I can find no indication of this in the draft local plan.
Paul Cottington National Farmers Union (South West)	SE-S4 dlp286 Support	Policy SE-S4 is in line with current planning guidelines.
Dr Duncan Jeffray Exmoor Society	SE-S4 dlp421 Support - subject to amendments	<p>A recently there have been several applications for large agricultural buildings in isolated locations, including one where a refusal was overturned on appeal, the Society has looked closely at this policy. We wished to test SC-S4 to see whether, despite the initial phrases, 'Permission will be granted for new or replacement agricultural buildings etc.' and sub condition a), it can be demonstrated there is a functional need for the building and its size and scale is commensurate with the demonstrated need it would be possible to refuse an application on landscape impact grounds. The Society is not convinced that sub section f 'they are of an appropriate siting, size, scale, massing, layout, external appearance, materials, and design that they have acceptable impact on the landscape character wildlife and cultural heritage' is strong enough and affords sufficient protection.</p> <p>We think that the word 'acceptable' is open to too many interpretations and is difficult to define. In addition it is felt that this subsection should be moved up the list to position 'd' as it is more closely linked to subsection 'c' in the list.</p>
Mr Ross Simmonds English Heritage South West	SE-S4 dlp726 Support - subject to amendments	We support the recognition of the historic farmsteads and the link, at Para. 8.59, to policy CE-S4, which could be usefully mentioned in policy SE-S4.
<b>SECTION 9 – ACHIEVING ENJOYMENT FOR ALL</b>		
Alan Morgan	9 dlp402 Support	7. Visitor Welfare: Tourism is likely to remain the bright star for the future prosperity of the ENP economy and must be given every opportunity to grow. The plans for accommodation and recreation can only have a positive effect on this aim.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mr Roger White	9 dlp407 Support	I support the Draft Policy Plan as a whole. The reinstatement of the railway supports the plan objectives of building a sustainable economy via tourism and employment for businesses supplying and catering for services within the Park. The development of the railway is a spur to improve off-road accessibility for tourist activity helping to reduce traffic congestion in busy areas and promoting walking and cycling with safety for all.
Mr John Airs	9.6 dlp19 Support	The expansion of the Lynton and Barnstaple railway will support the aims of improving the local economy and increasing eco-friendly tourism.
Mr Michael Pearce	9.6 dlp126 Support	The Lynton & Barnstaple Railway is already open from early in the year until late in the year, plus Santa Specials in the run up to Christmas. This means that visitors to Exmoor who come to stay 'out of season' have somewhere to visit, especially on those days when the weather is not that inviting for outdoor activities. This all helps those visitors to have happy memories of their stay in North Devon, rather than simply going home thinking that the whole area closes down for the winter. Venues which are open for most of the year are also able to employ local residents in full time jobs, rather than relying on casual labour from outside who merely lodge in the area for the summer season. The proposed extension to the railway will lead to more local people being employed full time.
Mr Anthony Spencer Tony	9.6 dlp172 Support	I have supported the possibility of the reinstatement of the Lynton & Barnstaple since I was introduced to it by the iconic book written by L Catchpole in the 1950's. Since the late 1970's enthusiasts from every walk of life and from all over the world have joined together to promote this aim. Today the railway is at the very edge of that fulfilment of running once again from Lynton to Barnstaple. Something I never thought there was a chance in my lifetime. With nearly 2500 members of the Lynton & Barnstaple Railway Trust, their efforts together with that an unknown number of fellow enthusiasts and supporters worldwide we hope the benefits for tourism and employment in the area will be fully recognised and receive the necessary acknowledgement and support. Recently the NEC celebrated the Lynton & Barnstaple Railway in a two day National Model Railway Exhibition where the support for the project brought together railway modellers from all over the country exhibition at least twelve different scale layouts and the support as far away as the Ffestiniog Railway of North Wales brought a full size working steam replica of one of the most famous narrow gauge railway

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
		locomotives in the world which one day very soon could be seen daily steaming its way through the beautiful North Devon countryside. I move to support the proposition.
Mike Highfield Somerset County Council	9.7 dlp262 Support	Unfortunately neither the NPPF, or later explanatory information provide objective guidance on how to demonstrate if a development is a change for the better, or gives rise to what might be considered an acceptable environmental impact. The NPPF stipulates (10) that 'plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas'. I consider the Exmoor Plan has provided good opportunity to stress the importance of protecting tranquillity (2.3-1, 5.169, 6.91, CC-S3.f, CC-D4.d, 6.173, 9.7, 9.9, 9.10, RT-D4.2d, 9.78) and consider noise impact from development (CE-S8.h, CE-S9.2a, CE-D5.c, CC-D6.b, 6.157, 6.173, 6.175, 7.236, 8.42, 9.87).
Mike Highfield Somerset County Council	9.9 dlp264 Support	Unfortunately neither the NPPF, or later explanatory information provide objective guidance on how to demonstrate if a development is a change for the better, or gives rise to what might be considered an acceptable environmental impact. The NPPF stipulates (10) that 'plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas'. I consider the Exmoor Plan has provided good opportunity to stress the importance of protecting tranquillity (2.3-1, 5.169, 6.91, CC-S3.f, CC-D4.d, 6.173, 9.7, 9.9, 9.10, RT-D4.2d, 9.78) and consider noise impact from development (CE-S8.h, CE-S9.2a, CE-D5.c, CC-D6.b, 6.157, 6.173, 6.175, 7.236, 8.42, 9.87).
Mike Highfield Somerset County Council	9.10 dlp265 Support	Unfortunately neither the NPPF, or later explanatory information provide objective guidance on how to demonstrate if a development is a change for the better, or gives rise to what might be considered an acceptable environmental impact. The NPPF stipulates (10) that 'plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas'. I consider the Exmoor Plan has provided good opportunity to stress the importance of protecting tranquillity (2.3-1, 5.169, 6.91, CC-S3.f, CC-D4.d, 6.173, 9.7, 9.9, 9.10, RT-D4.2d, 9.78) and consider noise impact from development (CE-S8.h, CE-S9.2a, CE-D5.c, CC-D6.b, 6.157, 6.173, 6.175, 7.236, 8.42, 9.87).
Mr John West	9.11 dlp4 Support - subject to amendments	The Lynton and Barnstaple Railway offers a car-free way of travelling to and though the National Park. It offers an experience that can be enjoyed when the weather is wet, when visitors might otherwise go home. The Welsh Highland Railway and the Ffestiniog Railways have proved the value of the reinstatement of narrow-gauge lines in an important landscape.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
		<p>People will very often use such lines in preference to travelling by coach on the roads. Local people in Snowdonia who opposed the restoration of the line have now come to appreciate the value of the new business it is generating. The value of the railway in teaching children about the history of transport and 19th century technology. It is a shame that the Southern Railway chose to close and scrap the line, when in similar circumstances the Great Western Railway kept the similar Vale of Rheidol Railway open. The present plan is in general very positive.</p> <p>The Lynton and Barnstaple Railway offers a car-free way of travelling to and though the National Park. It offers an experience that can be enjoyed when the weather is wet, when visitors might otherwise go home. The Welsh Highland Railway and the Ffestiniog Railways have proved the value of the reinstatement of narrow-gauge lines in an important landscape. People will very often use such lines in preference to travelling by coach on the roads. Local people in Snowdonia who opposed the restoration of the line have now come to appreciate the value of the new business it is generating. The value of the railway in teaching children about the history of transport and 19th century technology. It is a shame that the Southern Railway chose to close and scrap the line, when in similar circumstances the Great Western Railway kept the similar Vale of Rheidol Railway open. The present plan is in general very positive. It must be appreciated that volunteers are restoring the Lynton and Barnstaple Railway. The quality of their achievements is outstanding. A photograph of Woody Bay Station with restored rolling stock and a replica Manning Wardle locomotive is almost identical to an historic photograph, with the exception of the new being in colour. They do not have great resources, so every effort needs to be made to help them in every practical way. The authorities should make every effort to assist the railway in achieving or even exceeding its objectives. Every effort should be made to help the railway re-instate the line. Offers of buildings and redundant bridges to assist the company in keeping its cost to a minimum should be made. The plan should consider whether future extensions would be desirable or useful (there was a plan to extend the line westwards from Lynmouth that came to nothing.) Remember that the West Somerset Railway originally terminated at Watchet and was later extended to Minehead. Please do plan in the long-term. Would new branches be helpful for when road fuel gets very expensive?</p>
Mr Paul Curson	9.11 dlp59 Support	I think the comments of Mr John West (ID794675) regarding the reinstatement of the Lynton & Barnstaple railway are valid and considered.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mr Anthony Spencer Tony	9.11 dlp173 Support	I too support the comments made here. Living in Essex, I can't think of a better reason to regularly make the 300 mile trip to Devon than to enjoy the wishes of a lifetime come to fruition.
Gary Parsons Sport England	RT-S1 dlp314 General Comment	<p>5. Sport &amp; Recreation in National Parks Green Infrastructure pages 82-85 para 5.56-5.79 Policy CE-D2 GI Provision pages 85-87 para 5.80-5.85 Policy RT-S1 Recreation &amp; Tourism pages 307-311 para 9.9-9.20 Policy RT-D10 Recreational Development pages 336-339 para 9.72-9.83</p> <p>National Parks are an important resource for sport, and provide opportunities for millions of people each year to participate in their chosen activity. PLANNING POLICY OBJECTIVE: To maintain and improve opportunities for sport in the National Parks (including The Broads) and to ensure that existing and new activities are managed and developed in a way which meets the purposes of National Park designation and sustainable development objectives. Sport England will promote policies and practices that: - seek to maintain and improve opportunities for outdoor sport in National Parks; - promote the use of good management practices to balance the legitimate needs of sport with other interests; - do not seek to impose a blanket ban on certain sporting activities within National Parks; - take account of the sporting needs of the resident community within National Parks; and - seek to identify sites for possible counter attractions which may relieve the pressure on the most sensitive areas. National Parks provide some of the finest natural resources for sport. By far the greatest number of visits to National Parks are made by walkers, but the Parks are also an important specialist resource for sports such as climbing, caving and water sports, where the resource can be of national significance. Every year hundreds, if not thousands, of such sporting events take place that rely upon the natural environment. A lot are the transient, peripatetic sporting events that the organising club sets up, the competition takes place, and afterwards any equipment (e.g. signage, fences, ropes, show jumps) are dismantled and the land reverts to its original use. These events can include equestrian activities, motorsport, cycling, running, canoeing and climbing events. What all these sporting activities tend to have in common is a control point where participants assemble, register for the event, and it acts as the start/finish point for the competition; sometimes village halls can support this. Such activities may have some purpose built ancillary facilities, such as a floating pontoon, clubhouse, bunkhouses, changing rooms and storage units. Although not always essential this supporting infrastructure can be crucial to enable a good level of competition. Because of the transient nature of these types of events, they tend to operate outside the planning system and rely on the provisions of Class B, Part 4 of the Town and Country Planning (General Permitted Development) Order 1995. Part 4 allows for the temporary change of use of land for either 14 or 28 days a year. Because of this, many local authorities do not even know that the events are taking place in their area. Occasionally some</p>



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		<p>events do require planning permission and this tends to be where permitted development rights do not apply, or that the events have taken place more than 14 or 28 days per year and therefore exceed their permitted development rights. These events tend to use a range of different landscapes such as forests, waterways, moorland, old quarries, natural features such as rock faces and agricultural fields. Whilst some rely on using the rights of way network, other might use permissive routes such as private moorland tracks with the land owner's consent. Horse riding and mountain biking do also rely on manmade and more permanent cross county courses, which can sometimes require planning consent depending on scale and engineering work required. Sport on manmade routes and more peripatetic activities do happen in areas with landscape protection designations. The Scott Trial (see case study), for example, takes places in part on a Site of Special Scientific Interest, with the consent of the local planning authority and Natural England. Many rock faces are also designated SSSIs but still accommodate climbing competitions through a managed access protocol. Therefore landscape protection does not necessarily rule out a sporting event taking place. Case Study 1: Endurance: Endurance is long distance competitive horse riding. Many of these competitions take place in the countryside and utilise existing rights of way or tracks that cross private land. They tend to have a control point, this could be a field, or a local livery where there are access to stables. Rider register with the organiser at the control point and start the ride and finish the ride from the control point. The competition covers a number of routes set out at different competitive levels from novice to advance and riders are timed as they leave and return to the control point. The routes can be well defined such as a bridleway, or marked out with flags and markers to indicate the way. These events tend not to rely on permanent facilities, instead they are set up a few days before the event takes place and then after the event the flags, markers, control caravan anything else associated with the event are removed from the site. Endurance relies on a variety of different routes that can include river crossings, open moorland, forest tracks or even the beach. Case Study 2: The Scott Trial, Yorkshire Dales Many sporting events can be long standing ones. The Scott Trial has an extensive history beginning initially as an annual competition in 1907 where factory employees at the Scott Motorcycle factory in Keighley, West Yorkshire, rode road going machines along various tracks and open moor land in the Yorkshire Dales - many of the roads were not metalled in those days. The event attracted many spectators and these spectating Edwardians viewed the event as 'a fair old scramble' and hence the term 'motorcycle scrambling' was born. The event takes place in and around Arkengarthdale and Swaledale towards the end of October and has run every year, bar the war years (due to fuel rationing), since 1907. The Scott Motorcycle Trial is one of the oldest motorsport events in the UK, possibly the world. The Trial began well before Leeds</p>

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		<p>United Football Club was ever established and is possibly the oldest running (bar the war years) outdoor sporting event in Yorkshire after Grand St Ledger horse race at Doncaster.</p> <p>Sport England would encourage a "positive for sport approach" Local Plan Policy to enable the existing and future users opportunity to take part in recreational activities that meet social, health and well-being agendas.</p>
Mr Ross Simmonds English Heritage South West	RT-S1 dlp727 Support	We support the policy and its aim to ensure high quality visitor experience. Moreover, we welcome the inclusion of an approach to the reuse of traditional farmbuildings and farmsteads and references to policies CE-S5 and CE-S6.
Mr Andrew Austen North Devon Council	RT-S1 dlp864 Support	Welcome opportunities to deliver a high quality visitor experience.
The Crown Estate	RT-S1 dlp787 Support - subject to amendments	<p>One of the two statutory purposes of the National Park designations is 'to promote opportunities for the understanding and enjoyment of its special qualities by the public'. Much of this is done through recreation and tourism activities. Exmoor National Park has long been a popular tourist destination which provides a significant contribution to the Exmoor economy, providing enormous benefits to local businesses both directly and indirectly. Furthermore tourist related developments help to underpin the quality of the local environment and facilitate enjoyment of it both by local people and visitors alike. The Crown Estate is working hard to develop and enhance the tourism industry in Exmoor with the aim of increasing public awareness and the enjoyment of the National Park. An example of the good work carried out by The Crown Estate in this regard can be seen at Dunster Forest (see previous submission for more details). This has promoted Dunster as a 'gateway' to the forest and has led to significant benefits for local businesses in the village. It is the aspiration of The Crown Estate to continue, where appropriate, attract new forest based tourism activity. The above policy provides some</p>

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		<p>scope for them to do this, however, they are concerned at the emphasis placed on the 'quiet enjoyment' and 'experience of tranquillity' within the policy. The policy also requires locations of recreation, tourism and environmental education to be in accordance with the Spatial Strategy and other policies in the plan. This policy gives the impression that any activity within the national park that does not fall within this 'quiet and tranquil' category will be refused. How would the NPA categorise developments? Would the normal noise and disturbance restrictions not be sufficient in this instance? An activity, especially physically demanding or exhilarating activities, could be conducted with no noise at all, and yet people participating may not consider it to be truly 'tranquil'.</p> <p>The NPA is therefore urged to look more closely at this issue and define its terms. It is also urged to consider the economic benefit of these tourist activities and realise that many recreational developments, such as the Dunster Forest scheme which The Crown has promoted, brings benefits for local people and allows them increased access and enjoyment of the Park which further improves their health and wellbeing. The National Park Authority is therefore encouraged to support the work that The Crown Estate, and indeed others are doing to promote Exmoor as a popular destination.</p>
Mr Ross Simmonds English Heritage South West	RT-D1 dlp728 Support	We welcome this Policy.
Mrs Christine Fitzgerald Porlock Parish Council	RT-D2 dlp564 Support	We would support policy 1 to permit staff accommodation if it is not available in the locality.
Mrs Christine Fitzgerald Porlock Parish Council	9.31 dlp565 Support	Would also support proposals in para 9.31 to allow residential dwellings to revert back from guesthouses and hotels without the need for planning permission.
Suzie Sinden	9.32 dlp243 Support	Glad to see that more flexibility in planning allowances for changes of use of buildings. This will relieve a lot of house owners who are trapped in keeping B&Bs or similar when they get old, can't sell, or the business is no longer profitable.
Mr Ross Simmonds English Heritage South West	RT-D3 dlp729 Support	We support this Policy.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mike Highfield Somerset County Council	RT-D4 dlp266 Support	Unfortunately neither the NPPF, or later explanatory information provide objective guidance on how to demonstrate if a development is a change for the better, or gives rise to what might be considered an acceptable environmental impact. The NPPF stipulates (10) that 'plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas'. I consider the Exmoor Plan has provided good opportunity to stress the importance of protecting tranquillity (2.3-1, 5.169, 6.91, CC-S3.f, CC-D4.d, 6.173, 9.7, 9.9, 9.10, RT-D4.2d, 9.78) and consider noise impact from development (CE-S8.h, CE-S9.2a, CE-D5.c, CC-D6.b, 6.157, 6.173, 6.175, 7.236, 8.42, 9.87).
Mr Ross Simmonds English Heritage South West	RT-D4 dlp730 Support	We support this Policy.
Mr Ross Simmonds English Heritage South West	RT-D5 dlp731 Support	We support this Policy.
The Crown Estate	RT-D5 dlp788 Support	TCE is supportive of the approach taken by Exmoor NPA in providing tented camp sites, camping barns and alternative camping accommodation. As the above response indicates TCE is a significant supporter of tourism within the Park and has a number of sites and traditional barns which would be suitable for providing accommodation of this type.
Mr Ross Simmonds English Heritage South West	RT-D6 dlp732 Support	We welcome this Policy.
The Crown Estate	RT-D6 dlp796 Support	TCE is supportive of the approach taken by Exmoor NPA in providing tented camp sites, camping barns and alternative camping accommodation. As the above response indicates TCE is a significant supporter of tourism within the Park and has a number of sites and traditional barns which would be suitable for providing accommodation of this type.
Mr Ross Simmonds English Heritage South West	RT-D7 dlp733 Support	We support this Policy.
Mr Ross Simmonds English Heritage South West	RT-D9 dlp734 Support	We support this Policy.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
The Crown Estate	RT-D9 dlp797 Support	TCE is supportive of the approach taken by Exmoor NPA in providing tented camp sites, camping barns and alternative camping accommodation. As the above response indicates TCE is a significant supporter of tourism within the Park and has a number of sites and traditional barns which would be suitable for providing accommodation of this type. TCE is also pleased to see that alternative accommodation (RT-D9) has been given more flexibility than the traditional camping sites allowing for low impact proposals to be managed in a way that ensure the economic benefit of bringing tourists to the area without endangering the landscape of amenity of the Park.
Mike Highfield Somerset County Council	9.74 dlp252 Support	The Exmoor Plan has, in 1.11 identified that the National Planning Policy Framework has a presumption in favour of sustainable development. A planning proposal needs to demonstrate that sustainable criteria exist in three dimensions and a planning officer is instructed to consider all three. The requirement for acoustic consideration in planning falls under the 'environmental role' within which are the objectives of 'contributing to protecting and enhancing our natural, built and historic environment'. The ministerial foreword to the NPPF defined and extended the role of planning from one of scrutiny to one resulting in enhancement and improvement of surroundings as indicated by the statement 'Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives'. To assist in this there is now a requirement for applicants to seek early technical advice (192) and a need for LPAs to adopt proactive roles at pre-application (189, 190, 191) that help applicants solve problems (187). I consider the Exmoor Plan provides planning officers with opportunity to minimise the impact of some development at a pre-application stage (5.63, 5.111, 6.150, 6.175, 9.74, 10.56, and 12.6) and stress the needs for more specific consideration of noise.
Mike Highfield Somerset County Council	9.78 dlp267 Support	Unfortunately neither the NPPF, or later explanatory information provide objective guidance on how to demonstrate if a development is a change for the better, or gives rise to what might be considered an acceptable environmental impact. The NPPF stipulates (10) that 'plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas'. I consider the Exmoor Plan has provided good opportunity to stress the importance of protecting tranquillity (2.3-1, 5.169, 6.91, CC-S3.f, CC-D4.d, 6.173, 9.7, 9.9, 9.10, RT-D4.2d, 9.78) and consider noise impact from development (CE-S8.h, CE-S9.2a, CE-D5.c, CC-D6.b, 6.157, 6.173, 6.175, 7.236, 8.42, 9.87).

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Mrs Christine Fitzgerald Porlock Parish Council	9.79 dlp566 General Comment	We note the existence of the Greater Exmoor Shoots Association which regulates the sport on Exmoor, but would not want any increase in the level of shoots around Porlock for environmental reasons such as increased noise, traffic danger and danger to walkers who may wander into a shoot area.
Hugh Thomas Greater Exmoor Shoots Association	9.79 dlp323 <b>Object</b>	<p>We note that our role (that of GESA) has been marginalised in the latest draft plan by comparison with its precursor. We would respectfully suggest that the growth of this sector of the Exmoor economy has been noticeably greater than in any other area, and that ours is entirely without public funding (distinguishing Game Shooting from farming or tourism in general). (Even in Exford, the economic contribution (inter alia to hotels and B&amp;B) is significant by comparison with the popular concept of equestrian activity.) Some of the comments are grudging or lack an understanding of the advantages of game shooting to the National Park and the surrounding country.</p> <p>The comments at paragraph 9.79. are speculative and, while we would not seek to contradict the statements for they may have some weight, there is no balancing reference to the benefits to the environment that shooting brings. We would like greater fairness in these comments, please.</p>
Hugh Thomas Greater Exmoor Shoots Association	9.80 dlp326 <b>Object</b>	<p>We note that our role (that of GESA) has been marginalised in the latest draft plan by comparison with its precursor. We would respectfully suggest that the growth of this sector of the Exmoor economy has been noticeably greater than in any other area, and that ours is entirely without public funding (distinguishing Game Shooting from farming or tourism in general). (Even in Exford, the economic contribution (inter alia to hotels and B&amp;B) is significant by comparison with the popular concept of equestrian activity.) Some of the comments are grudging or lack an understanding of the advantages of game shooting to the National Park and the surrounding country.</p> <p>The remarks at paragraph 9.80 are imprecise and appear to us to be unclear.</p>
Gary Parsons Sport England	RT-D10 dlp315 General Comment	5. Sport & Recreation in National Parks Green Infrastructure pages 82-85 para 5.56-5.79 Policy CE-D2 GI Provision pages 85-87 para 5.80-5.85 Policy RT-S1 Recreation & Tourism pages 307-311 para 9.9-9.20 Policy RT-D10 Recreational Development pages 336-339 para 9.72-9.83 National Parks are an important resource for sport, and provide opportunities for millions of people each year to participate in their chosen activity. PLANNING POLICY OBJECTIVE: To maintain and improve opportunities for sport in the National Parks (including The Broads) and

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		<p>to ensure that existing and new activities are managed and developed in a way which meets the purposes of National Park designation and sustainable development objectives. Sport England will promote policies and practices that: - seek to maintain and improve opportunities for outdoor sport in National Parks; - promote the use of good management practices to balance the legitimate needs of sport with other interests; - do not seek to impose a blanket ban on certain sporting activities within National Parks; - take account of the sporting needs of the resident community within National Parks; and - seek to identify sites for possible counter attractions which may relieve the pressure on the most sensitive areas. National Parks provide some of the finest natural resources for sport. By far the greatest number of visits to National Parks are made by walkers, but the Parks are also an important specialist resource for sports such as climbing, caving and water sports, where the resource can be of national significance. Every year hundreds, if not thousands, of such sporting events take place that rely upon the natural environment. A lot are the transient, peripatetic sporting events that the organising club sets up, the competition takes place, and afterwards any equipment (e.g. signage, fences, ropes, show jumps) are dismantled and the land reverts to its original use. These events can include equestrian activities, motorsport, cycling, running, canoeing and climbing events. What all these sporting activities tend to have in common is a control point where participants assemble, register for the event, and it acts as the start/finish point for the competition; sometimes village halls can support this. Such activities may have some purpose built ancillary facilities, such as a floating pontoon, clubhouse, bunkhouses, changing rooms and storage units. Although not always essential this supporting infrastructure can be crucial to enable a good level of competition. Because of the transient nature of these types of events, they tend to operate outside the planning system and rely on the provisions of Class B, Part 4 of the Town and Country Planning (General Permitted Development) Order 1995. Part 4 allows for the temporary change of use of land for either 14 or 28 days a year. Because of this, many local authorities do not even know that the events are taking place in their area. Occasionally some events do require planning permission and this tends to be where permitted development rights do not apply, or that the events have taken place more than 14 or 28 days per year and therefore exceed their permitted development rights. These events tend to use a range of different landscapes such as forests, waterways, moorland, old quarries, natural features such as rock faces and agricultural fields. Whilst some rely on using the rights of way network, other might use permissive routes such as private moorland tracks with the land owner's consent. Horse riding and mountain biking do also rely on manmade and more permanent cross county courses, which can sometimes require planning consent depending on scale and engineering work required. Sport on manmade routes and more peripatetic activities do happen in areas</p>

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		<p>with landscape protection designations. The Scott Trial (see case study), for example, takes places in part on a Site of Special Scientific Interest, with the consent of the local planning authority and Natural England. Many rock faces are also designated SSSIs but still accommodate climbing competitions through a managed access protocol. Therefore landscape protection does not necessarily rule out a sporting event taking place. Case Study 1: Endurance: Endurance is long distance competitive horse riding. Many of these competitions take place in the countryside and utilise existing rights of way or tracks that cross private land. They tend to have a control point, this could be a field, or a local livery where there are access to stables. Rider register with the organiser at the control point and start the ride and finish the ride from the control point. The competition covers a number of routes set out at different competitive levels from novice to advance and riders are timed as they leave and return to the control point. The routes can be well defined such as a bridleway, or marked out with flags and markers to indicate the way. These events tend not to rely on permanent facilities, instead they are set up a few days before the event takes place and then after the event the flags, markers, control caravan anything else associated with the event are removed from the site. Endurance relies on a variety of different routes that can include river crossings, open moorland, forest tracks or even the beach. Case Study 2: The Scott Trial, Yorkshire Dales Many sporting events can be long standing ones. The Scott Trial has an extensive history beginning initially as an annual competition in 1907 where factory employees at the Scott Motorcycle factory in Keighley, West Yorkshire, rode road going machines along various tracks and open moor land in the Yorkshire Dales - many of the roads were not metalled in those days. The event attracted many spectators and these spectating Edwardians viewed the event as 'a fair old scramble' and hence the term 'motorcycle scrambling' was born. The event takes place in and around Arkengarthdale and Swaledale towards the end of October and has run every year, bar the war years (due to fuel rationing), since 1907. The Scott Motorcycle Trial is one of the oldest motorsport events in the UK, possibly the world. The Trial began well before Leeds United Football Club was ever established and is possibly the oldest running (bar the war years) outdoor sporting event in Yorkshire after Grand St Ledger horse race at Doncaster. Sport England would encourage a "positive for sport approach" Local Plan Policy to enable the existing and future users opportunity to take part in recreational activities that meet social, health and well-being agendas.</p>
Mr Ross Simmonds English Heritage South West	RT-D10 dlp736 Support	We support this Policy.



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The Crown Estate	RT-D10 dlp798 Support	TCE is supportive of the above policy and are pleased to see that, where appropriate and where it can demonstrated to be appropriate, development can be located outside of local service centres and villages. TCE recognises that whilst tourist development should be appropriate and sustainable, due to the nature of the Park many of the attractions and recreational facilities are not suitable to location in the more built up areas.
Mike Highfield Somerset County Council	9.87 dlp274 Support	Unfortunately neither the NPPF, or later explanatory information provide objective guidance on how to demonstrate if a development is a change for the better, or gives rise to what might be considered an acceptable environmental impact. The NPPF stipulates (10) that 'plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas'. I consider the Exmoor Plan has provided good opportunity to stress the importance of protecting tranquillity (2.3-1, 5.169, 6.91, CC-S3.f, CC-D4.d, 6.173, 9.7, 9.9, 9.10, RT-D4.2d, 9.78) and consider noise impact from development (CE-S8.h, CE-S9.2a, CE-D5.c, CC-D6.b, 6.157, 6.173, 6.175, 7.236, 8.42, 9.87).
Mr Ross Simmonds English Heritage South West	RT-D11 dlp737 Support	We support this Policy.
Mrs Christine Fitzgerald Porlock Parish Council	9.100 dlp567 Support	We agree and strongly support the proposals for improvement, enhancement and maintenance of ROW's but would like to know if this is sustainable due to budget restrictions. Does the Plan address this problem?
Mr Ian MacCormac	Railways dlp16 Support	Thoroughly approve of safeguarding railway land for future uses
Mr David Tooke	Railways dlp56 Support	
MR Paul Haresnape	Railways dlp69 Support	An authentic reconstruction of the Lynton & Barnstaple Railway, with provision for park and ride, will add greatly to visitor's enjoyment of this part of Exmoor without detriment to the landscape. Anyone who has visited Snowdonia, for example, will appreciate how a restored railway adds rather than detracts to the unique experience of a National Park.
Mr James Brigden	Railways dlp87 Support	

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Mr Bruce Nottrodt	Railways dlp113 Support	The reinstatement of the Lynton and Barnstaple railway will fulfil a number of the high level planning objectives of the plan. In particular Objectives 2.3 (11, 12, 13,16, 19)
Mr Robert Friendship	Railways dlp151 Support	I thoroughly support the safeguarding of former permanent ways for possible reinstatement. The infrastructure is far too valuable to be allowed to be demolished or damaged.
Mr Martin Swainson	Railways dlp178 Support	
Mr Andrew Jones	Railways dlp215 Support	There are already many references here to the potential of a reinstated railway to make a massive contribution to the objectives of the plan - I feel it's extremely important to protect these routes in order to support such schemes.
Mr Martin Steel	Railways dlp196 Support	
Mr David Bloomfield	Railways dlp209 Support	
Mr Andrew Hearn	Railways dlp230 Support	
Roger Martin	Railways dlp303 Support	Thank you for the opportunity to comment on the Exmoor National Park plan. I strongly agree with and support all recommendations which safeguard the route of the Lynton and Barnstaple Railway to secure its future reinstatement.
Mr Michael Berry Lynton & Barnstaple Railway Trust	Railways dlp375 Support	I strongly support the proposal for "Achieving Enjoyment for All". In particular the policies for safeguarding land along former railways and "Reinstatement of the Lynton & Barnstaple Railway". I agree the proposals will provide sustainable modes of travel within the National Park. It is also to be expected that rebuilding the Railway and the enlarged operation will increase visitor numbers to the National Park and surrounding areas boosting 'tourism' which is the main driver of the local economy. Finally if the railway is rebuilt it will be largely constructed at private expense - not public expense as is the case with most transport infrastructure. P.S. It is really pleasing to see the support for the L&B Railway to be rebuilt so clearly stated in the Local Plan.

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Mr Ross Simmonds English Heritage South West	Railways dlp738 Support	We support these policies and text.
Mr Tim Roy	Railways dlp430 Support	As a long-standing member of the Lynton & Barnstaple Railway Trust I fully endorse the draft policy. It is vital to protect the track bed from other developments in order to achieve re-instatement of the railway. The re-instatement of the railway supports the plan objectives of achieving a sustainable economy and enjoyment for all of the National Park. The railway will be a spur to tourism which is the main driver of the local economy. The original railway is world-renowned, and the re-instated railway will draw visitors from all over the UK and abroad wishing to enjoy the experience of travelling by such iconic trains through such a beautiful landscape. Due to the relatively isolated location, visitors are likely to visit other attractions in the area too, and significantly increase income in the local hospitality and leisure sectors.
Mr Ian Cowling Lynton & Barnstaple Railway Trust	Railways dlp587 Support - subject to amendments	<p>Overview The Lynton &amp; Barnstaple Railway Trust (the Trust) strongly welcomes and supports the inclusion of specific commentary and policies to safeguard land on the route of the former railway and supporting its eventual reinstatement. We agree that it is necessary and important that the local plan contains policies which: protect land on the route of the former railway from development which would prevent its use as a reinstated railway or other form of transport network route protect land necessary to rejoin the route of the former railway where the original route can no longer be used from development which would prevent its use as a reinstated railway or other form of transport network route support the reinstatement of the railway in a fashion which is in keeping with its valuable contribution to the cultural heritage of the Park, re-using original railway infrastructure wherever possible and practical support new development which is necessary for the reinstatement of the railway where re-use of the original railway infrastructure is not possible or practical. We also agree that the reinstatement of the railway should also accord with other policies of the Plan insofar as could be reasonably expected for such a unique and exceptional development.</p> <p>Detail We are concerned that the commentary and policies relating to the Railway are unnecessarily detailed and contain specific points which are inaccurate or overreach the appropriate scope of the Plan. One could consider this detail to be protracted, prescriptive and repetitive. None of these concerns undermine our strong support for the inclusion of specific commentary and policies to safeguard land on the route of the former railway and supporting its eventual reinstatement in the Plan. We suggest, however, that the commentary and policies could be better and more succinctly expressed, without detriment to the National Park purposes and duty. Rather than provide exhaustive comments and suggested amendments to</p>

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		the Draft Plan, we have identified our main concerns and will seek a meeting to establish the best way in which we could assist the NPA in tightening and improving this section of the Plan. Repetition Paragraphs 9.113 to 9.123 of the Plan are needlessly repetitive of both the content of Policy RT-S2 and of other policies in the plan. We suggest that the commentary contains the specific objectives for the reinstatement of the railway and that Policy RT-S2 contain the requirements by which these objectives should be achieved. The commentary could also briefly cross reference the other policies of the plan that the reinstatement of the railway engages, but there is no need to rehearse the predicted nature of that engagement in the commentary or policy RT-S2.
Mr Walter Crowe	Railways dlp628 Support	Paragraphs 9.104 to 9.122: The local economy is highly dependent on tourism, which will be supported by a reinstated Lynton & Barnstaple Railway. The objectives of achieving a sustainable economy and enjoyment for all of the National Park are supported by this.
Mr Walter Crowe	Railways dlp629 General Comment	Paragraphs 9.104 to 9.122: Much of this can be read as creating a huge pile of bureaucratic red tape, something which, as I understand the position, the Government opposes and wishes to see cut back drastically.
Mr Martyn de Young	9.104 dlp50 Support	As well as having an important historic cultural value to Exmoor National Park, a reinstated Lynton & Barnstaple Railway can bring considerable future benefits, in local employment, reduced traffic congestion and improved tourist revenue to the local area it will serve.
Mr David Tooke	9.104 dlp57 Support	
Mr John Heys	9.104 dlp71 Support	The former railway routes are an important part of the Exmoor heritage and must be protected. The re-instatement of the Lynton & Barnstaple Railway will improve access to areas of Exmoor not easily reached by car, and in a much more environmentally friendly way.
Mr Charles summers	9.104 dlp86 Support	The restoration of the Lynton & Barnstaple Railway will give pleasure to thousands of visitors each year and show them a cross section of local farms etc. that they would not get from their cars. Young and old and disabled people alike will be able to travel across Exmoor without damaging footpaths or leaving gates open! The district will benefit from an increase in income from visitors without problems caused by lack of car parking in Lynton. The opportunities for

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		local apprenticeships will help local young people in an area with few jobs other than farming or teashops.
Mr Barry Marshall	9.104 dlp100 Support	
Mr Adrian Maunders	9.104 dlp120 Support	This is a policy which shows foresight by the Park Authority which is very welcome from many points of view, including for the local economy and environment. The Lynton and Barnstaple Railway have demonstrated their sensitivity to the setting of the railway. This policy will encourage them in their great endeavour to re-instate a major element of the heritage of North Devon, particularly the links with Lynton and Sir George Newne's legacy.
Mr John Edmonds	9.104 dlp127 Support	
Mr Robert Friendship	9.104 dlp153 Support	The support given to the reinstatement of the Lynton & Barnstaple Railway actively assists in the provision and expansion of the amenities of Exmoor and the surrounding area. It will promote the economy to a new level and possibly bring further much needed investment to North Devon and Somerset and would be an invaluable asset and I commend the supporters of this policy.
Mr Geoff Cowan	9.104 dlp166 Support	
Mr Martin Swainson	9.104 dlp179 Support	
Mr Martin Steel	9.104 dlp185 Support	The re-instatement of the railway supports the plan objectives of achieving a sustainable economy and enjoyment for all of the National Park. The railway is really one of the main assets of the area. The organisation has shown that it can manage responsibly and can be trusted to meet all the other protective measures in the policy
Mr Robert Palmer	9.104 dlp197 Support	

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Mr David Bloomfield	9.104 dlp210 Support	
Mr Andrew Hearn	9.104 dlp229 Support	
Mr Anthony Hocking	9.104 dlp351 Support	As a native of Devon and a railway enthusiast, I am extremely pleased that the Lynton & Barnstable Railway reinstatement is considered favourably for the National Park. I fully support the reinstatement. I believe that, if reinstatement is achieved, it will be of great benefit to tourism in the National Park, and will provide opportunities for employment and extended facilities for the entertainment and support for the potential passengers and visitors.
Ms Judy Williams Lynton & Barnstaple Railway Trust	9.104 dlp631 Support	The Railway brings lots of visitors and income into the North Devon area, as well as offering a protected, green corridor for wildlife in an open area of countryside. It could offer an eventual transport link from Barnstaple into Lynton, or in the shorter term from Wistlandpound into Lynton, which helps with the limited parking problem in the town as there will be more available parking space near the stations. We are also conserving an historical part of the area, bringing back heritage carriages and locomotives and providing a reference for schools, visitors and local people. Plus, it's an exciting project to see take shape after all the work the enthusiastic volunteers, employees and trustees put in, because they believe it's a worthwhile and valuable asset to everyone living in, or visiting the area.
Mr John Allen MBE Lynton & Barnstaple Railway Trust	9.104 dlp638 Support	The re-instatement of the railway supports the plan objectives of achieving a sustainable economy and enjoyment of the Exmoor National Park. In addition it will support and encourage tourism which in turn will inject additional money into the local economy. It should also, in due course, improved communications and relieve the parking issues of Lynton. It has my strong support.
Mr David Martin	9.105 dlp5 Support	The reinstatement of the Lynton and Barnstaple Railway would enable visitors to travel into the National Park with minimal disruption to the environment they have come to enjoy.
Mr Keith Vingoe	9.105 dlp24	The reinstatement of the L&B will do much to improve Lynton and Lynmouth's future - imagine Minehead's prospects without the WSR.

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	Support	
Mr David Garbett-Edwards	9.105 dlp28 Support	The reinstatement of the Lynton and Barnstaple Railway will add to the experience and enjoyment of visitors to the National Park and fits in well with the ethos of the Park and its surrounding area.
Revd Timothy Woods	9.105 dlp44 Support	The reinstated Lynton & Barnstaple Railway will offer the opportunity for both appropriate tourist development and improved public transport access to a popular part of the North Devon Coast. Based on a unique example of Britain's railway heritage, the railway will also offer valuable educational opportunities for students and visitors.
Mr Martyn de Young	9.105 dlp51 Support	With only one mile of railway relaid, and non-authentic locomotives and carriages, the Lynton & Barnstaple Railway is already having a positive impact on the area, improving tourist income from many of the visitors and volunteers involved. With the restored original and replica rolling stock now coming on-stream, a longer line and an increased "visitor experience", as well as the prospect of easy car-free access to Lynton, the economic impact on Exmoor will continue to grow. As a regular visitor to the area for the past 20 years, I have seen both the decline in general economic activity in the area, and the benefits that the railway can bring to help reverse this.
Mr David Tooke	9.105 dlp58 Support	
Mr Paul Curson	9.105 dlp60 Support	As a regular visitor to Exmoor for the past 5 years, I can see the enormous potential for increased and sustainable tourism by the continued reinstatement of the former Lynton & Barnstaple railway. Ultimately, this project can provide alternative access to Lynton with resultant economic benefit to that settlement, both in the form of increased takings and further job creation. From what I have seen of the railway's current status, there will be plenty of opportunity for visitors to appreciate the landscape of Exmoor as the railway expands, for the pleasure and benefit of all.
MR Paul Haresnape	9.105 dlp70 Support	I believe that the trustees and supporters of this railway will be successful in re-opening the line from Lynton to Blackmore Gate within a decade provided they have support from the relevant authorities. There is an enormous amount of goodwill towards this unique railway not just in this country, but also around the world.
Mr John Heys	9.105 dlp72	The re-instated Lynton and Barnstaple Railway will include a park-and-ride facility from Blackmoor Gate to Lynton, improving access without the need for cars to negotiate the difficult

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	Support	road network in Lynton and Lynmouth. Therefore rather than harming the experience, it will enhance it.
Mr Tony Nicholson	9.105 dlp83 Support	As a resident of Lynton I wholeheartedly look forward to the reinstatement of the Lynton & Barnstaple Railway, which in the view of most local people should never have been closed. The Lynton & Barnstaple Railway Trust have already demonstrated the value of reopening one mile of the original line; extending it to Blackmoor Gate - and indeed to Barnstaple - will prove even more valuable in reviving the local economy in a sustainable way and bringing more and more people into the National Park without in any way damaging the beauty and tranquility they come to enjoy. This unique and world-famous (yes, world-famous) railway is a major player in Exmoor's cultural heritage and should be celebrated as such.
Mr James Brigden	9.105 dlp88 Support	Indeed, I believe reinstatement of the L&BR will positively enhance the experience and enjoyment of the National Park, adding to its valuable regional personality and reducing the impact from alternative, often more intrusive mechanisms of transport.
Mr Barry Marshall	9.105 dlp101 Support	
Mr Robert Barnard	9.105 dlp107 Support	Access to former railway routes for restored train services allows visitors and local people of all ages and all levels of mobility to experience the countryside whilst causing the minimum of harm to the landscape, and should therefore be welcomed.
Mr Maurice Hartnell	9.105 dlp128 Support	The former Lynton and Barnstaple Railway was an important feature of Exmoor life 100 years ago and its reinstatement as a heritage railway will enable future generations to enjoy and learn about its historical significance.
Mr Brod Bass	9.105 dlp149 Support	Reopening this railway will dramatically add to the enjoyment of the Park's outstanding natural beauty for many, as is the case for other such railways, particularly in North Wales.



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Mr Robert Friendship	9.105 dlp152 Support	This wonderful enterprise does, I believe, bring far more to the locality than just as a valuable asset and scenic attraction, both as is and as proposed. Supported, to a large degree, by voluntary endeavour the social benefits are evident. The good humour that abounds cannot, I believe, be quantified when applied to the invitation and welcome extended to visitors to this attraction in particular and to the local area in general. Traditional and modern skills combine to foster and promote this undertaking and it provides an attractive and interesting learning environment for young and old alike by active participation or by example. There must surely be considerable scope for local employment if the planned expansion is allowed to materialise. It would be fantastic to see the plan mature to fulfilment with all of the benefits that it must surely bring to Exmoor and beyond. I wish it continued and expanding support and every success.
Mr David Horsfall	9.105 dlp154 Support	
Mr Brod Bass	9.105 dlp156 Support	Reinstatement of the railway will greatly enhance the enjoyment of the Park's natural beauty by many.
Mr David Horsfall	9.105 dlp159 Support	The re-instatement of the Lynton and Barnstaple Railway can only be an asset to Exmoor National Park - it provides a transport solution for moving people through the park with minimal disruption, taking cars and coaches off the roads. It will provide additional income to the local area and allows more people to see the delights of Exmoor.
Mr Geoff Cowan	9.105 dlp167 Support	
Mr Martin Swainson	9.105 dlp180 Support	So much hard work has been done to re-instate the historic Lynton and Barnstaple Railway; it must continue to fruition.
Mr Andrew Jones	9.105 dlp222 Support	The reinstatement of the railway should be both supported and encouraged as much as possible. As well as providing eco-friendly transport, anything that reduces road congestion (and hence improves road safety) can only be a good thing.
Mr Martin Steel	9.105 dlp186 Support	This railway is really the most effective way that the objectives of this policy can be met. A real win-win if ever I saw one

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Mr Andrew Hearn	9.105 dlp231 Support	
Mr Ian Cowling Lynton & Barnstaple Railway Trust	9.105 dlp589 General Comment	<p>Major Development Paragraph 9.105 states that 'Where a proposal is classified as major development it must accord with GP3.' However, the Plan does not define major development, only giving examples of what sorts of development it might be, of which the railway is not one. As the Plan notes, it is a long-standing principle that, in line with the Silkin Test principles, major development should not be allowed unless it is absolutely necessary, in the national interest and that there is no practical alternative.</p> <p>We struggle to see how the reinstatement of the railway could be construed as major development in terms of the reasoning and examples used in the commentary of the Plan, and if it were how it could be justified as acceptable in line with the Silkin Test principles and the principal elements of Policy GP3 of the plan. We therefore suggest that the final sentence of paragraph 9.105 is misplaced and should be removed.</p>
Mr John Read	9.105 dlp644 Support	<p>With the knowledge of the numbers of tourists attracted by the 'little railways' in Wales (Ffestiniog, etc.), the reinstatement of the previously much loved Lynton and Barnstaple Railway will be a boost to tourism in the Exmoor National Park worth, if any, environmental disruption and will create additional employment.</p>
Mr Andrew Hearn	9.108 dlp234 Support	
Mr Anthony Hocking	9.108 dlp352 Support	<p>I fully support the retention of the West Somerset Mineral Railway incline as a National Monument. It is a magnificent monument to past industrial efforts in the area.</p>
Mr John West	9.109 dlp3 Support - subject to amendments	<p>The Lynton and Barnstaple Railway offers a car-free way of travelling to and though the National Park. It offers an experience that can be enjoyed when the weather is wet, when visitors might otherwise go home. The Welsh Highland Railway and the Ffestiniog Railways have proved the value of the reinstatement of narrow-gauge lines in an important landscape. People will very often use such lines in preference to travelling by coach on the roads. Local people in Snowdonia who opposed the restoration of the line have now come to appreciate the value of the new business it is generating. There is value of the railway in teaching children about the history of transport and 19th century technology. It is a shame that the Southern</p>

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		<p>Railway chose to close and scrap the line, when in similar circumstances the Great Western Railway kept the similar Vale of Rheidol Railway open. The present plan is in general very positive.</p> <p>It must be appreciated that volunteers are restoring the Lynton and Barnstaple Railway. The quality of their achievements is outstanding. A photograph of Woody Bay Station with restored rolling stock and a replica Manning Wardle locomotive is almost identical to an historic photograph, with the exception of the new being in colour. They do not have great resources, so every effort needs to be made to help them in every practical way. The authorities should make every effort to assist the railway in achieving or even exceeding its objectives. Every effort should be made to help the railway re-instate the line. Offers of buildings to possibly 'transplant' and redundant bridges to assist the company in keeping its cost to a minimum should be made. The plan should consider whether future extensions would be desirable or useful (there was a plan to extend the line westwards from Lynmouth that came to nothing.) Remember that the West Somerset Railway originally terminated at Watchet and was later extended to Minehead. Please do plan in the long-term. Would new branches be helpful for when road fuel gets very expensive?</p>
Mr David Martin	9.109 dlp7 Support	If the Lynton and Barnstaple Railway had managed to keep running into the 1950's, it would have undoubtedly become an early volunteer run railway and the benefits to the tourism economy of the local area would have been significant. This has been demonstrated where heritage railways are now running.
Mr David Garbett-Edwards	9.109 dlp29 Support	Since much of the trackbed and infrastructure of the Lynton and Barnstaple Railway still exists, its reinstatement is a wonderful project and a most appropriate one for the National Park. There is no doubt that as the Railway expands it will attract more tourists to the area and provide a welcome boost to the economy of the Park and the businesses that operate within it.
Mr Martyn de Young	9.109 dlp52 General Comment	The original line closed in 1935, largely due to increased competition from road users. In the intervening 80 years, things have moved on, and increased road traffic is now a major concern in many areas. A reinstated L&B running between Blackmoor Gate and Lynton will relieve pressure on the local roads, providing parking outside (or at least on the edge of) the Exmoor National Park, and encourage visitors to Parracombe, Lynton and Lynmouth.

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Mr John Heys	9.109 dlp73 Support	The Lynton & Barnstaple Railway closed in 1935 as a result of the Depression and road competition. Tourism has increased enormously in recent times which will ensure that the re-instated railway is commercially viable.
Mr Barry Marshall	9.109 dlp102 Support	
Mr Steve Randall	9.109 dlp148 Support	While I am aware that for the present we must of necessity focus on the extension of the railway to Caffyns and Wistlandpound, with the introduction of new activities for the Calvert Trust, the total completion of the Lynton and Barnstaple railway to Pilton would see an even greater tourist attraction to the area, social use by local residents, and hopefully also allow a modern vehicle(s) to provide at least one daily commuter service, morning and evening. This could be a quick service as the line is of a high standard and was originally built with main line signalling, and modern techniques could introduce even higher safety. This service could be subsidised by the local authority if needs be, and a competitive price could well allow travellers to avoid an often arduous journey, even in severe weather. There would also bring the benefit of visitors being able to board trains in Barnstaple, thus removing some car travel and parking upon the moor itself. Although the heritage vehicles are as true as possible to the originals in appearance as modern safety constraints will allow, the new locomotives will be greener and more efficient than the originals because steam loco design has not stood still since steam disappeared from the main line. Perhaps this means new halts, in keeping with the originals, could be introduced at new locations near attractions such as Exmoor Zoo or the Motte and Bailey Castle for instance. On a falling grade, extra stops ought not to affect the timing of a morning commuter service from Lynton.
Mr Andrew Jones	9.109 dlp224 Support	The majority of the infrastructure still exists - reinstatement of the railway has the potential to create jobs (both direct and indirect), increase tourist revenue in the area, and offer an improved public transport service for both locals and visitors. Each train has the potential to take over one hundred people off of narrow, twisting and overcrowded roads.
Mr Martin Steel	9.109 dlp187 Support	

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mr David Martin	9.110 dlp6 Support	Reinstatement of the Lynton and Barnstaple Railway would enable many more visitors to come to Lynton and provide a much needed boost to the local tourism economy. It has been proved that the opening of a heritage railway can have a major impact on the local economy. Examples of this positive impact can be seen at Swanage, Porthmadog and Minehead.
Mr Keith Vingoe	9.110 dlp25 Support	The group at Woody Bay station have shown amazing resolve in recreating a splendid attraction with historical connections to Exmoor. This railway was and is unique and appreciated worldwide and its reconstruction is to be applauded as it will provide a linear attraction to Exmoor for all to enjoy. It will prove to be a boon to Lynton and Lynmouth.
Mr David Garbett-Edwards	9.110 dlp31 Support	When the original Railway was operating the distance of the Lynton Station from the town was an issue. The Trust is well aware that it will be essential to provide a good link between the Station and the Town in order to maximise the number of visitors wishing to use the Railway and will also benefit the economy of Lynton.
Mr Peter Miles	9.110 dlp33 Support	The reconstruction of the Lynton & Barnstaple Railway currently underway is faithful rebuilding of the line. It attracts visitors from around the world to view and enjoy both the Exmoor scenery and the railway. Further reconstruction as proposed will be a tremendous benefit locally.
Revd Timothy Woods	9.110 dlp45 Support	Although Barnstaple lies outside the National Park, reinstatement of the route between Lynton and Barnstaple itself offers the prospect of a closer link to the national railway network, and to longer distance bus services serving Barnstaple. This will be of benefit to residents of Lynton and Lynmouth, as well as to smaller communities along the route.
Mr Richard Greenwell	9.110 dlp49 Support	The proposal to reinstate the Lynton & Barnstaple Railway would appear to be largely in line with the recommendations contained in the National Park Consultation document. The L & B Trust certainly intend to construct a railway which is faithful to the original, thereby creating a valuable historical, social, educational and cultural facility. The proposed railway is in line with the need to help create a sustainable future for the economy of Exmoor by stimulating growth in the tourist industry, so essential for the future development of the whole area. The Trust's proposals aim to create a local amenity which sits sympathetically within the nature of the local environment.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mr John Heys	9.110 dlp74 Support	The Lynton and Lynmouth Neighbourhood Plan strongly supports the re-instatement of the railway line to Lynton. A better sited terminus when the line is re-built would enhance access to Lynton and especially Lynmouth. Both towns will benefit, and the Cliff Railway will become an even more important and utilised link.
Mr James Brigden	9.110 dlp89 Support	An opportunity exists to correct an oversight made during the original planning of the L&BR and site a new terminus closer to the towns with improved access. This will further enhance the positive impact that reinstatement will contribute to the towns. Where practical it is preferable that this construction reflect the architecture and design of the original railway, though modifications required by current planning legislation and operational considerations are to be anticipated. The fact that the original terminus cannot be used due to the encroachment of modern developments since closure shows to demonstrate just how important proposal RT-D13 is.
Mr Barry Marshall	9.110 dlp103 Support	
Mr Robert Barnard	9.110 dlp109 Support	I work as a volunteer, publicising the rebuilding of the Lynton & Barnstaple Railway at large events in the North West of England, and in North Wales. I also deliver lectures about the history and rebuilding of the railway to local history, industrial archaeology and railway groups in the same areas. As the rebuilt line gains momentum and becomes more widely known, I am finding that many people (of all age ranges) are talking of visiting (or revisiting) the North Devon area for holidays, the L&B Railway providing them with the spur to select this area in preference to other areas to spend their leisure time. These visitors to the area will form an important element of the local economy in the future, spending time in the area and spending money on accommodation, on meals and on other attractions and leisure activities, in the course of even a short visit to the railway. As has been shown in areas such as North Wales, the local economy benefits hugely from restored railways. Such a development in North Devon should be encouraged.
Mr Brod Bass	9.110 dlp150 Support	I already contribute to the economy of Lynton & Lynmouth by basing myself there whilst regularly visiting the railway. The potential for more people to do this is substantial.
Mr John Edmonds	9.110 dlp211 Support	

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mr Andrew Jones	9.110 dlp225 Support	I agree with the points made by other commentators
Mr Martin Steel	9.110 dlp188 Support	The evidence to date is that here is an organisation who can carry out work to the standard and in the spirit of what the policy is proposing
Mr Robert Palmer	9.110 dlp201 Support	
Mr David Bloomfield	9.110 dlp212 Support	
Mr Bruce Nottrodt	9.111 dlp110 Support	To enable the full reinstatement of the line.
Mr Robert Barnard	9.111 dlp111 Support	Former railway routes have the potential to benefit the local area, whether carrying trains, or providing access into rural areas for walkers, or as habitats for wildlife. They should be safeguarded for such future use.
Mr Bruce Nottrodt	9.111 dlp112 Support	I believe this should include footways etc. to old mines.
Mr Bruce Nottrodt	9.111 dlp129 Support - subject to amendments	I believe that in the case of the Lynton and Barnstaple Railway the route should be reserved for rail purposes. This need not exclude the creation of alternative parallel access routes where other environmental factors allow this.
Mr Andrew Jones	9.111 dlp226 Support	The routes of the former railways need to be maintained as a continuous line to maximise their potential - this policy is imperative.
Mr Robert Palmer	9.111 dlp199 Support	
Mr Robert Palmer	9.111 dlp200 Support	

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mr Anthony Hocking	9.111 dlp353 Support	Safeguarding the route of the Lynton & Barnstable Railway is a vital pre-requisite for reinstatement and I fully support this policy.
Mr David Martin	9.112 dlp8 Support	I agree that the existing route should be used if at all possible. This would ensure the historical context of the railway within its surroundings is maintained. I would support a deviation from the old railway if no other alternative was possible.
Mr Paul Curson	9.112 dlp61 Support	I agree that the original trackbed should be used for the reinstated railway wherever possible to maintain the historic context of the line. I appreciate that this may not be possible in all locations and am supportive of necessary deviations if required.
Mr Bruce Nottrodt	9.112 dlp130 <b>Object</b>	The former trackbed of the Lynton and Barnstaple Railway should be excluded from this exclusion
Mr Martin Steel	9.112 dlp189 Support	
Mr David Martin	9.113 dlp9 Support	I support the reinstatement of the Lynton and Barnstaple Railway as it was originally, because that is part of the heritage of the area. The use of original style carriages and locomotives and original buildings will encourage visitors to travel on the line because it would be a unique experience.
Mr Richard Collis	9.113 dlp23 Support	The rebuilding of the L&B railway is already bringing more visitors to the area and providing new employment. The full reinstatement will be a substantial visitor attraction and provide real benefit to the local economy, plus further new employment opportunities. Visitors using the L&B Railway to and from Lynton will lessen the volume of motor traffic using that section of the A39 in the holiday periods.
Mr David Garbett-Edwards	9.113 dlp30 Support	It is my understanding that the draft plans for the reinstatement of the Lynton and Barnstaple Railway will seek to make use of as much of the existing buildings and infrastructure as possible, indeed that is one of the key objectives - to attempt to recreate the experience of the Railway as it used to be when originally operating.
Mr Paul Curson	9.113 dlp62	I am in favour of the railway's full reinstatement but support the view that such works must have regard for the general policies of preserving the Exmoor character.



Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
	Support	
Mr John Heys	9.113 dlp75 Support	The re-instatement of the Lynton & Barnstaple Railway must be as faithful to the original railway as practically possible to enhance the heritage experience and the traditional appeal of the Exmoor area.
Mr James Brigden	9.113 dlp90 Support	A faithful and accurate reconstruction of the original L&BR infrastructure and design is paramount unless it is completely impractical or significantly cost prohibitive to do so.
Mr Barry Marshall	9.113 dlp104 Support	
Mr Robert Barnard	9.113 dlp115 Support	Work on restoring the Lynton & Barnstaple Railway to date has shown that local people and visitors expect the restoration to retain the character and appearance of the original line, reusing structures etc. wherever possible, and that the value as a historical and cultural asset is maximised by this approach. Some carefully exercised flexibility is needed, however, to balance this ideal with the need to cater for the expected numbers of visitors.
Mr Brod Bass	9.113 dlp161 Support	The heritage aspect, woven into the recent history of Exmoor, is critical. The work and ethos of the organization now running the short length of restored railway demonstrates just how faithful they are to these objectives.
Mr Geoff Cowan	9.113 dlp168 Support	
Mr John Edmonds	9.113 dlp216 Support	
Mr David Bloomfield	9.113 dlp217 Support	
Mr David Bloomfield	9.113 dlp218 Support	

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mr Richard Pyatt	9.113 dlp642 Support	<p>As a supporter of the fully reinstated railway, I wish to express my support for a plan that includes the safeguarding of the trackbed, buildings, etc., of the Lynton Barnstaple Railway in order that the present revival company would be able to continue to expand their operations at Woody Bay Station to reopen this line to its original length. I am an active member of the Ffestiniog Railway in North Wales, detailed studies for that line have clearly shown the financial and economic, as well as environmental, benefits a preserved but well run and maintained railway can bring to an area, especially one of outstanding natural beauty and also one in a National Park, in this case Snowdonia. Indeed a recent study found that over £5million was generated from the local economy in North Wales by the railway. The ability of such a railway to move large numbers of people in comfort safely through the countryside is a huge bonus that does not adversely affect local roads, etc. It enables walkers etc. to join/leave at various points along the route. The Railway Company has already proved its historical responsibility towards its buildings and will continue to maintain all buildings to a high standard that fit well within the community. Such a restored line will also prove a great attraction to the whole area and with termini in Lynton (on an agreed more central site) and with a revised, suitable site in Barnstaple (that has access to already available car parking), the railway can benefit the whole area without creating additional car access problems. The overall improvement to local trade and industry will be felt over a much longer period of the year, not the peak months of June, July, August and September. Indeed the FR now finds much traffic in the shoulders, i.e. from February to November, justifying trains almost all year round. Please accept this is not simply a train enthusiast's response but a clear case of wanting another area of Britain that does not receive huge financial grants due to poverty, high unemployment, etc., to benefit from a small but highly viable business that will highlight the areas assets and beauty and allow thousands to enjoy its scenery from a train window. I can confirm that the Railway Company is a thoroughly efficient and well run, with professional people running it who are not simply playing trains - they want a successful business that is an essential part of the local landscape and economy. Please support this line and its aims, etc. as part of your overall plan.</p>
Mr David Martin	9.114 dlp10 Support	<p>Because the Lynton and Barnstaple Railway was unique and had a charm that has been described by all the people who knew it, the reinstatement should be true to the original line. Any new development should be in keeping with the original and only if there is no alternative.</p>

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mr David Garbett-Edwards	9.114 dlp32 Support	There are bound to be some instances where the railway will need new buildings and other structures which have been lost or deteriorated since it closed in 1935. An example being the need to build a new section of track around Wistlandpound Reservoir which has covered part of the original trackbed. As long as these new developments fit in with the style and character of the original Railway there would be no detrimental impact on the National Park.
Mr Paul Curson	9.114 dlp63 Support	I am in agreement with this policy statement
Mr John Heys	9.114 dlp76 Support	There will be instances where new buildings will be necessary in order to protect and maintain the historic and valuable equipment including locomotives and carriages. Deviations from the original route should only happen where there is no realistic alternative, even if it means trackbed incursions in recent decades need to be removed.
Mr James Brigden	9.114 dlp92 Support	Deviations from the original route and architecture of the historic L&BR are guaranteed given the development of the route and reuse of many of the railway buildings since closure. I fully agree that wherever possible these should be minimised however in order to maintain as faithful a reconstruction as possible.
Mr Robert Barnard	9.114 dlp116 Support	
Mr Brod Bass	9.114 dlp162 Support	I support this statement and consider that this strategy is in the minds of all those supporting the railway.
Mr Geoff Cowan	9.114 dlp169 Support	
Mr Martin Steel	9.114 dlp191 Support	
Mr David Martin	9.115 dlp11 Support	I support the re use of original buildings, but if there is no alternative, I support new buildings if they can be sensitively sited and have minimal impact on the existing environment.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mr Keith Vingoe	9.115 dlp26 Support	Those seeking to rebuild this railway are already well aware of the importance of the railway as it was and have sought to reinstate the railway as it once was as well as its "character" as can be witnessed by the superb restoration of the three original carriages and the livery carried by the engines. Anything else but the restoration of the railway as it was would be unacceptable.
Mr Peter Miles	9.115 dlp34 Support	The policy of the Trust reconstructing the railway is to replicate and rebuild the line as it was. Hence the rebuilding of three original coaches with more to follow, the reconstruction of original locomotives, restoration of buildings, stations, bridges etc. in their original appearance and location is a central part of the proposals. Alternatives for buildings or bridges may be required where the original is no longer possible.
Mr Paul Curson	9.115 dlp64 Support	If the railway is to expand to such a level to provide good facilities visitors expect, I think some additional development will be essential. However, I am supportive of the policy that such works should be sympathetic to the environment.
Mr John Heys	9.115 dlp77 Support	Re-use of the existing buildings is essential to minimise the impact on the National Park and preserve as much of the heritage as possible. Some additional structures may prove necessary in order to protect the rolling stock from the Exmoor weather. North Devon Council should assist in this aim by encouraging through the planning process the return of surviving buildings to their former use.
Mr Peter Snashall	9.115 dlp82 Support	The aims of the L&BR Trust are consistent with this policy. The original infrastructure being key to the character of the Railway. However, it should be understood that current legislation and operational requirements may, on occasion require new structures.
Mr Bruce Nottrodt	9.115 dlp114 Support	
Mr Robert Barnard	9.115 dlp117 Support	
Mr David Horsfall	9.115 dlp155 Support	
Mr Andrew Jones	9.115 dlp227 Support	

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mr Martin Steel	9.115 dlp190 Support	
Mr Robert Palmer	9.115 dlp202 Support	
Mr David Martin	9.116 dlp12 Support	The character of the original railway must be maintained.
Mr Peter Miles	9.116 dlp35 Support	The rebuilding of the L&BR in a manner faithful to the original is an essential and central part of the project.
Revd Timothy Woods	9.116 dlp46 Support	Even though the Lynton & Barnstaple Railway Trust has aspirations to extend the railway beyond the former terminus to a new station to be built much closer to Lynton, it will be important to ensure that those facilities reflect the character and design of the original railway as far as practicable. The need for environmental sustainability may require some creative but sympathetic reworking of the old designs, however: as a simple example, double glazing and improved insulation would be essential in buildings.
Mr John Heys	9.116 dlp78 Support	Any new structures should be traditional in appearance and replicate where realistic the original buildings.
Mr James Brigden	9.116 dlp95 Support	Using Woody Bay as an example, to date this aim has been delivered admirably by the L&BR Trust.
Mr Robert Barnard	9.116 dlp118 Support	
Mr David Horsfall	9.116 dlp157 Support	
Mr Brod Bass	9.116 dlp163 Support	The railway already admirably demonstrates these principles
Mr John Edmonds	9.116	

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
	dlp220 Support	
Mr Andrew Jones	9.116 dlp228 Support	
Mr Martin Steel	9.116 dlp192 Support	
Mr Robert Palmer	9.116 dlp203 Support	
Mr David Bloomfield	9.116 dlp214 Support	
Mr Peter Snashall	9.117 dlp84 General Comment	Railway land can provide a safe and protected corridor for flora and fauna.
Mr Bruce Nottrodt	9.117 dlp119 Support	I strongly believe that the railway and the land immediately adjacent will create wildlife corridors for smaller fauna
Mr Robert Barnard	9.117 dlp121 Support	
Mr Bruce Nottrodt	9.117 dlp132 General Comment	Any development of the railway should be subject to an appropriate environmental assessment with a balance struck between any harm caused and mitigation/enhancement that takes place.
Mr Bruce Nottrodt	9.117 dlp134 Support	There should be no deviation from statutory requirements
Mr Robert Palmer	9.117 dlp204 Support	
Mr James Brigden	9.118 dlp96	Agreed.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
	Support	
Mr Robert Barnard	9.118 dlp122 Support	
Mr David Martin	9.119 dlp13 Support	I agree that the historical accuracy of the reinstatement should be paramount.
Mr Keith Vingoe	9.119 dlp27 Support	This is the sensible approach and unarguable.
Mr Paul Curson	9.119 dlp65 Support	I agree with this policy which is what all supporters of the railway should have in mind.
Mr John Heys	9.119 dlp79 Support	The railway's heritage will be fully supported only by the historic accuracy of the entire railway, where practical.
Mr Robert Barnard	9.119 dlp123 Support	
Mr Bruce Nottrodt	9.119 dlp133 Support	The reinstatement of the railway should reflect the nature of the original.
Mr Andrew Jones	9.119 dlp235 Support	I understand that historical accuracy is an integral part of the plans to reinstate the L&B, as it should be.
Mr Robert Palmer	9.119 dlp207 Support	
Revd Timothy Woods	9.120 dlp47 Support	Development of the Lynton & Barnstaple Railway has the potential for improving access to the Park for bicycles while avoiding the need to bring them into the Park by motor vehicle.
Mr Ian Cowling Lynton & Barnstaple Railway Trust	9.120 dlp590 General Comment	Paragraph 9.120 refers to Somerset and Devon County Council (our emphasis), in referring to the sustainable transport implications of the railway. We presume the reference to Somerset is a mistake, as the railway falls entirely within Devon.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mr Ian MacCormac	9.123 dlp17 Support	Agree
Mr Peter Miles	9.123 dlp36 Support	The example of the ENPA proposals for a transport hub at Blackmoor Gate is a clear indication of a sensitive and worthwhile scheme
Mr Paul Curson	9.123 dlp66 Support	The proposed developments of the railway at Blackmoor Gate rightly take account of this policy.
Mr James Brigden	9.123 dlp97 Support	A sensible addition to the plan. The Right of Way should not be allowed to be compromised again in the future should its reinstatement be interrupted for any reason.
Mr Robert Barnard	9.123 dlp124 Support	Railway routes provide an important element of the landscape, and should be preserved for the future.
Mr Bruce Nottrodt	9.123 dlp135 Support	This would also retain the wildlife corridor
Mr Brod Bass	9.123 dlp164 Support	Many worthy issues are raised in comments already made.
Mr Martin Swainson	9.123 dlp182 Support	
Mr Martin Steel	9.123 dlp193 Support	
Mr Martin Steel	9.123 dlp195 Support	



Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mr Walter Crowe	9.123 dlp630 <b>Object</b>	Turning the line of the proposed railway into a linear access path is only feasible if the agreement for the acquisition of the land by the Lynton & Barnstaple Railway permits this. If this is not the case then this should not be subject to compulsory legal powers, but by agreement with those concerned if possible. Consequently this section must be reworded to reflect this.
Mr David Tooke	RT-D13 dlp55 Support	
Mr Paul Curson	RT-D13 dlp67 Support	Should the railway reinstatement project fail, or be only partially achieved, the route should be conserved as a continuous entity for its historic significance and as route for the enjoyment of the local landscape.
Mr John Heys	RT-D13 dlp81 Support	The existing traditional Lynton and Barnstaple Railway route should be protected fully from any further encroachment, in order to ensure no further barriers to re-instatement are created.
Mr James Brigden	RT-D13 dlp98 Support	Fully in support of these stated aims.
Mr Bruce Nottrodt	RT-D13 dlp136 Support	
Mr Martin Swainson	RT-D13 dlp183 Support	
Mr Robert Palmer	RT-D13 dlp213 Support	
Mr David Bloomfield	RT-D13 dlp219 Support	
Mr Andrew Hearn	RT-D13 dlp232 Support	

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Richard Heacock	RT-D13 dlp275 Support	I applaud the recent Draft Exmoor National Park Local Plan, and in particular, Policy RT-D13, which seeks to safeguard the historic route of the Lynton and Barnstaple Railway.
David Cameron	RT-D13 dlp277 Support	I was particularly delighted to read that you appear to be in support of the re-instatement of the Lynton & Barnstaple Railway (Policies RT-D13 & RT-S2).As one who frequently holidays in North Devon (we have a family holiday home in Braunton) I have got to know the route of the old railway fairly well, and feel that once it is up and running again (whether or not in my lifetime I am not sure - but possibly in my son's?) you will have an absolute winner on your hands. The scenery in the climb from sea level at Barnstaple to Blackmore Gate along the Yeo valley is pretty, but really does not prepare you for the stunning views across the Bristol Channel to South Wales once the summit is reached. Most of the earthworks (cuttings & embankments) are still in-situ so massive constructions (apart from at one or two locations) should not really be required. The length of line at Woody Bay that the enthusiasts have already reopened shows how well the railway seems to sit in the North Devon landscape. The more visitors who can be encouraged to visit the National Park by means other than by road vehicles, lessens the chance of them destroying the very beauty they have come to see. You are to be congratulated on your far seeing positive stance.
Mrs Heather Cross	RT-D13 dlp330 Support	I support the proposals to safeguard land along the route of the former Lynton and Barnstaple Railway to enable its future reinstatement which can only help boost tourism and in turn help the local businesses/economy. Being rebuilt as original the railway will also be of great interest nationally due to its cultural heritage. Although we live in Leicestershire we visit Lynton at least four times a year because of the railway.
Mr Julian Palmer	RT-D13 dlp332 Support	As a native North Devonian, I believe that the re-instatement of the railway will assist with many of the plans objectives. Increased visitor numbers will greatly assist existing local businesses, encourage new ones, & bring money into the local economy, without large infrastructure implications. Using the railway will bring people into ENP without using their cars. It would also provide local employment. The L & B R was/is part of N. Devon's history and heritage. It is a priceless local asset.
Mr Robert Cross	RT-D13 dlp334 Support	I believe the Railway will be a major asset to Exmoor National Park and to North Devon, being of both local and national importance in terms of economic, social and cultural heritage. Although not living locally we visit Lynton on at least four times a year to visit the railway.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mr Michael Berry Lynton & Barnstaple Railway Trust	RT-D13 dlp376 Support	I strongly support the proposal for "Achieving Enjoyment for All". In particular the policies for safeguarding land along former railways and "Reinstatement of the Lynton & Barnstaple Railway". I agree the proposals will provide sustainable modes of travel within the National Park. It is also to be expected that rebuilding the Railway and the enlarged operation will increase visitor numbers to the National Park and surrounding areas boosting 'tourism' which is the main driver of the local economy. Finally if the railway is rebuilt it will be largely constructed at private expense - not public expense as is the case with most transport infrastructure. P.S. It is really pleasing to see the support for the L&B Railway to be rebuilt so clearly stated in the Local Plan.
Mr Tim Lewis	RT-D13 dlp639 Support	I very much support the reinstatement of the Lynton and Barnstaple Railway which will meet the objectives of the Plan. It will contribute to a sustainable economy by bringing tourists who will bring business for shops, cafés, B&B's etc. It will bring also accessibility and great enjoyment of the magnificent scenery from the train ride (rather than from the private car). It should never have closed.
Mr Ross Simmonds English Heritage South West	RT-D13 dlp739 Support	We support these policies and text.
Mr Andrew Austen North Devon Council	RT-D13 dlp865 Support	NDC will recognise cross-boundary opportunities for enhancing the network, including the former Lynton and Barnstaple Railway, through opportunities for cross boundary linkages. It complements the policies in the emerging North Devon and Torridge local plan.
Mr Reginald Weaver	RT-D13 dlp662 Support	Exmoor has always been a place of unique beauty for my family and we make regular short break visits. It is very good to see restoration enterprises getting under way which have the potential to attract both younger and older members of visiting parties, especially those proposals which might in the future provide a further public transport facility so that more areas can be reach without having to use a car. The proposed Lynton & Barnstaple railway scheme seems to fulfil that aim; furthermore, it would be very sympathetic to the landscape and general atmosphere of Exmoor, and would surely be of economic benefit to the Exmoor community- and thus in its way assist in helping the areas of self-sustenance.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mr Robert Bradbury	RT-S2 dlp2 Support	Re-instatement of the railway supports the plan objectives of achieving a sustainable economy for and enjoyment of the National Park. The railway will support and encourage tourism which is the principal driver of the local economy.
Mr David Martin	RT-S2 dlp14 Support	I strongly support the reinstatement of the Lynton and Barnstaple Railway as it will have a major benefit to the tourist economy of the National Park and will enable visitors to travel into the Park in a way that has minimal impact on the environment. I visit Lynton twice a year purely because of the railway at Woody Bay and so I contribute to the local economy. If the railway were reinstated, many more people would be encouraged to visit North Devon and the economy would benefit considerably.
Mr Jon Wilkes	RT-S2 dlp15 Support	The re-instatement of the railway supports the plan objectives of achieving a sustainable economy and enjoyment for all of the National Park. The railway will be a spur to Tourism which is the main driver of the local economy. It may also alleviate some traffic problems within Lynton and Lynmouth, as well as within the Exmoor park, as visitors could park their vehicles at the southern / western end of the railway, nearer Barnstaple and the Link Road, and use the railway as an enjoyable tourist access route through Exmoor to Lynton.
Mr Ian MacCormac	RT-S2 dlp18 Support	The re-instatement of the railway supports the plan objectives of achieving a sustainable economy and enjoyment for all of the National Park. The railway will be a spur to Tourism which is the main driver of the local economy. I would love to see this happen, over time. A beautiful idea.
Mr Peter Miles	RT-S2 dlp37 Support	The reopening of the Railway will provide vital economic benefits to the area and encourage visitors. It will also enhance enjoyment of the national park in an unrivalled way. It is also replacing a much-missed part of the North Devon heritage.
Revd Timothy Woods	RT-S2 dlp48 Support	It is clear that re-instatement of the railway would support the plan objective of achieving a sustainable economy; it would also enhance the enjoyment of the National Park. The railway will both provide a public transport link and, more importantly, encourage tourism which is the main driver of the local economy.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mr Martyn de Young	RT-S2 dlp53 Support	As a supporter and member of the Railway - and a regular visitor to the area - for over twenty years, I have seen the way that sympathetic improvements are being made to equip the railway for modern requirements, while retaining the historical accuracy as much as possible, and I fully support the attention to detail that has been applied to date. As the line is expanded towards both Lynton and Barnstaple, the economic benefit to the area will increase, and there is no reason why an extended L&B - especially if it can retain its original charm and style - couldn't become a preeminent attraction to national and international visitors, improving the tourist economy through increased accommodation and other needs as well as a valuable local community service.
Mr David Tooke	RT-S2 dlp54 Support	Reinstatement of the Lynton & Barnstaple Railway will provide a major tourist attraction for the area, leading to sustainable growth in the local economy and employment opportunities. This will be a recreation of an historic feature of Exmoor, unique in England. It will also provide a means by which everyone will be able to enjoy the National Park without adding to traffic congestion and pollution. Evidence for the benefits of rebuilding such an historic narrow gauge railway is easy to find: one only has to look at the success of the Festiniog Railway and the new Welsh Highland Railway in the Snowdonia National Park, and the way in which these have boosted the local economy in North Wales.
Mr Paul Curson	RT-S2 dlp68 Support	The reinstated railway will bring a multitude of benefits to the area, both economic and leisure. I fully support its total reconstruction.
Mr John Heys	RT-S2 dlp80 Support	The reconstruction of the Lynton & Barnstaple Railway will provide a sustainable access route to the twin towns of Lynton and Lynmouth and help reduce car traffic into the twin towns. It will hugely support existing businesses in the area which rely on tourism and encourage the development of new enterprises, both of which will significantly increase local employment opportunities. The railway will also provide a new transport link to the largest town in the region, Barnstaple. The principal attraction of the railway will be its heritage and traditional appearance, which must therefore be encouraged and supported.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mr Peter Snashall	RT-S2 dlp85 Support	The Railway already benefits to the local economy and should be supported in its aims to extend, further maximising these benefits. The rebuilt Railway does much to benefit the wider scope of this plan.
Mr James Brigden	RT-S2 dlp99 Support	Fully in support. I believe that progress with the reinstatement to date by the L&BR Trust has fully demonstrated that all of these aims are at the heart of their strategic plans for the future of the project. Success to the railway!
Mr Barry Marshall	RT-S2 dlp105 Support	
Mr Robert Barnard	RT-S2 dlp125 Support	
Mr Patrick Murrell	RT-S2 dlp131 Support	There is no doubt that the re-instatement of the Lynton and Barnstaple Railway will provide a tremendous boost for the local economy.... tourism and employment to name just two of the benefits. The re-building of the Welsh Highland Railway in recent years amply demonstrates this: North Devon is badly in need of new Tourist attractions and the Railway would surely be just that, and fitting in to the beautiful local countryside.
Mr Bruce Nottrodt	RT-S2 dlp137 Support	The presence and economic benefit of the railway will support the wider economic development, heritage and environmental objectives of the ENPA
Mr Brod Bass	RT-S2 dlp165 Support	This railway, and those working tirelessly within the L&BR Trust that has demonstrated already its commitment to the key points in this Plan, deserves the full support of all authorities and organizations in a position to so do.
Mr Geoff Cowan	RT-S2 dlp170 Support	
Mr Peter Bowes	RT-S2 dlp171 Support	The revived short section of the Lynton and Barnstaple Railway at Woody Bay Station has already proved its economic worth as a major tourist attraction. The planned extensions of the line can only serve to enhance this by creating a major draw with substantial economic benefits in terms of spend as well as employment to the region attached - just look at what has been achieved in North Wales with the Ffestiniog and Welsh Highland Railways. In addition, an extended railway, hopefully between Wistlandpound Reservoir and Lynton in the foreseeable

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		future, will create a significant park and ride opportunity for the twin villages of Lynton and Lynmouth, reducing pressure on the road system. Such park and ride arrangements have been proved highly successful elsewhere in the West Country, notably on the Swanage Railway between Norden and Swanage, as well as on the South Devon railway between Buckfastleigh and Totnes. All this.... plus the opportunity to recreate one of the most famous narrow gauge railways (in fact "any-gauge-railways) in the world.
Mr Derrick Plyer	RT-S2 dlp339 Support	The point I wanted to make in support of the Lynton & Barnstable Railway re-instatement is as follows: - I suspect the majority of local persons will appreciate that when the railway has extended to serve significant destinations it will be a major Tourist Attraction benefitting virtually the whole Exmoor area. Rather than just take the opinions of railway supporters could I suggest to you that you seek unbiased opinions from appropriate Council Officials of Town Councils that have experienced the re-opening of railways serving their communities. The nearest I suggest would be Minehead whose topography could be said to be similar to Lynton. Others that come to mind are Swanage, Kidderminster, Bridgenorth, Portmadoc, Sheringham. Who better to give you their opinion of what this may feed into your local economy!
Mr Martin Swainson	RT-S2 dlp184 Support	
Mr Martin Steel	RT-S2 dlp194 Support	Fully agree with comments made by Mr Murrell and Mr Bowes
Mr Robert Palmer	RT-S2 dlp223 Support	The recovery of otherwise derelict and overgrown land which when managed will open up lost and obstructed views and improve wildlife habitat, normally restricted from "domesticated" animals and other casual access.
Mr David Bloomfield	RT-S2 dlp221 Support	
Mr Andrew Hearn	RT-S2 dlp233 Support	

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David Cameron	RT-S2 dlp278 Support	I was particularly delighted to read that you appear to be in support of the re-instatement of the Lynton & Barnstaple Railway (Policies RT-D13 & RT-S2).As one who frequently holidays in North Devon (we have a family holiday home in Braunton) I have got to know the route of the old railway fairly well, and feel that once it is up and running again (whether or not in my lifetime I am not sure - but possibly in my son's?) you will have an absolute winner on your hands. The scenery in the climb from sea level at Barnstaple to Blackmore Gate along the Yeo valley is pretty, but really does not prepare you for the stunning views across the Bristol Channel to South Wales once the summit is reached. Most of the earthworks (cuttings & embankments) are still in-situ so massive constructions (apart from at one or two locations) should not really be required. The length of line at Woody Bay that the enthusiasts have already reopened shows how well the railway seems to sit in the North Devon landscape. The more visitors who can be encouraged to visit the National Park by means other than by road vehicles, lessens the chance of them destroying the very beauty they have come to see. You are to be congratulated on your far seeing positive stance.
Mrs Heather Cross	RT-S2 dlp331 Support	I support the proposals to safeguard land along the route of the former Lynton and Barnstaple Railway to enable its future reinstatement which can only help boost tourism and in turn help the local businesses/economy. Being rebuilt as original the railway will also be of great interest nationally due to its cultural heritage. Although we live in Leicestershire we visit Lynton at least four times a year because of the railway.
Mr Julian Palmer	RT-S2 dlp333 Support	As a native North Devonian, I believe that the re-instatement of the railway will assist with many of the plans objectives. Increased visitor numbers will greatly assist existing local businesses, encourage new ones, & bring money into the local economy, without large infrastructure implications. Using the railway will bring people into ENP without using their cars. It would also provide local employment. The L & B R was/is part of N. Devon's history and heritage. It is a priceless local asset.
Mr Robert Cross	RT-S2 dlp335 Support	I support the proposals for safeguarding the land along the route of the former Lynton and Barnstaple Railway and for its reinstatement.



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Graham Lelliot	RT-S2 dlp336 Support	I would just like to show my support regarding the local plan and in particular, my support in the re-instatement of the Lynton and Barnstaple Railway. We live in Worthing, West Sussex but holiday in North Devon every year. We enjoy visiting Lynton and Lynmouth and think it would make the visit even more spectacular if we could arrive by steam railway. What a great idea to use it as a park and ride, leaving the car at Blackmoor Gate. Lynton and Lynmouth deserve to have the number of vehicles on the road reduced and so think that this is a fantastic idea.
William Allen	RT-S2 dlp337 Support	Please record my full support for the development of the railway.
Patrick Armstrong	RT-S2 dlp338 Support	I support the plan. In particular I support the reinstatement of the railway. In 50 or a 100 years time the railway will be seen as a vastly different means of transport in the country. At present there are still people interested to rebuild this with knowledge from those who remember and ran the railway. These skills will soon be lost and will never again be able to be used to replace what is lost. This is just as important as any other way of life from the past, for the area.
Richard Pocock	RT-S2 dlp340 Support	I am very pleased to see that the reinstatement of the above together with the conservation of the West Somerset Railway remains are supported in the draft plan. The West Somerset and the mining remains are a very important part of the area's history, but the Lynton and Barnstaple is even more important for not just history but ecology and most importantly tourism. The reinstatement of the line from Blackmoor Gate to Lynton will on its own attract large numbers of visitors who will then visit Lynton and Lynmouth which desperately needs tourism for their economies. They can use the railway as a park and ride, relieving congestion on the roads and parking problems within the towns. Once this has been achieved restoration to Barnstaple is much more straight forward, but will be a further attraction for visitors which will add to the ecological and economic advantages. The evidence from the Welsh Highland supports this argument. It's good to see the National Park supporting the reinstatement unlike Snowden which initially opposed the Welsh Highland but now appreciate the advantages that the restored line brings with almost no development or ecological problems. A clear well balanced and forward thinking plan.

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Robin Lucas	RT-S2 dlp342 Support	I strongly support the aims of the Lynton and Barnstaple Railway. It served the local communities in its original form despite not being a success financially, which led to its demise. There are however some very good reasons to support its reinstatement, and having been there in the first place, it cannot be seen as a new development in the National Park. Therefore it should be included as an existing (if partly dormant) facility. Tourism is the new justification for the development of the L&B. Numerous studies quote figures based on tourism spends, but having looked at many of them in detail, they simply wildly understate the benefits. As an example, I have seen Somerset CC studies which say that £1 spend on the West Somerset Railway translates to a £2 or £3 benefit to the local economy. This is wildly off the mark. I travel from Essex to the WSR and pay perhaps £45 for a 4 day ticket. In those 4 days I spend locally £100 on a tankful of fuel, 4 nights in a B&B costing perhaps £180, meals in restaurants say £60, drinks in pubs perhaps £36 or more, and purchases of several dozen bottles of cider in such places as Sheppeys Cider farm say £30, not to mention spending on taxis and buses and donations to local charities. I would say that a £45 purchase on the WSR equates to nearly £450 spend in the local economy. That is 10 times what I spent on my ticket. This can be easily translated to the L&B - rebuilding the railway will bring in tourism benefits... I am prepared to travel to such attractions, and I am sure that many others would also. I do hope that no Planning constraints will be placed on the L&B. It would be good to see the old trackbed protected from any incursions, and for the Railway to have the active support of the Exmoor National Park,
Nick Evetts	RT-S2 dlp343 Support	I sadly do not live in Devon, but here I have to add if I did you would never hear the end of me. It can only make economic sense to allow (with care) the re-instatement of the long forgotten Railway. Tourism has to be the way forward as manufacturing is now third class in these Islands of ours. I know you will probably write me off as an anorak, but do not forget the beautiful country you live in and all it takes to share it is a fairly cheap re-build (£21 million). If I had the money it would be re-instated trust me. I hope you do not think I am being harsh, but please do consider my comments.
Jacquie Andrews	RT-S2 dlp344 Support	I would support the draft plan outlined and would especially support the inclusion of a reopened Lynton & Barnstaple railway. This would be excellent for tourism in the area.

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Bill Graham	RT-S2 dlp350 Support	As a resident of Lynton I want to fully support the Lynton and Barnstaple Railway as part of the Plan. There is nothing else which will bring employment to the area while enhancing the natural beauty of the Park and improving access. You could say that Lynton is 2 hours from anywhere but at least a train journey on a heritage railway from Barnstaple would be a pleasurable experience! Perhaps they could also include an up to date set of carriages for the natives who may prefer comfort and air-conditioning, especially in winter.
Mr Anthony Hocking	RT-S2 dlp354 Support	All the provisions of this section are obviously sensible and to be supported. I particularly note paragraph k which states a fall-back use of the railway route as a linear access route; this is eminently sensible and would also provide some form of 'green corridor' for wildlife.
Mr Michael Berry Lynton & Barnstaple Railway Trust	RT-S2 dlp377 Support	I strongly support the proposal for "Achieving Enjoyment for All". In particular the policies for safeguarding land along former railways and "Reinstatement of the Lynton & Barnstaple Railway". I agree the proposals will provide sustainable modes of travel within the National Park. It is also to be expected that rebuilding the Railway and the enlarged operation will increase visitor numbers to the National Park and surrounding areas boosting 'tourism' which is the main driver of the local economy. Finally if the railway is rebuilt it will be largely constructed at private expense - not public expense as is the case with most transport infrastructure. P.S. It is really pleasing to see the support for the L&B Railway to be rebuilt so clearly stated in the Local Plan.
Mr Ian Cowling Lynton & Barnstaple Railway Trust	RT-S2 dlp588 Support - subject to amendments	Prejudgement: Both the commentary and policy effectively attempt to prejudge the likely nature of the railway reinstatement proposals at certain points. This is both unnecessary and unreasonable as the full nature of the proposal is not known, and the purpose of policy is to allow it to be judged on its merits when it is. A clear example of this is paragraph c) of Policy RT-S2, which first states that: The proposal should not generate the need for a separate new build dwelling and any dwelling proposals should accord with HC-S1 Housing, HC-D2 New Build Dwellings in Settlements, HC-D5 New Build Dwellings in the Open Countryside and CE-S5; As a matter of principle we do not think that it is possible for the Plan to prejudge that the reinstatement project should not generate the need for a separate new build dwelling. Should any dwelling be part of the proposals it should be judged against the comprehensive policies of the plan dealing with new dwellings, not picked out for prejudgement. In fact the policy appears to go on to suggest this, which is somewhat confusing. The other areas of policy which

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		<p>concern us most are: - the emphasis on replication of the former railway - the assumptions made about the parking needs of the reinstated railway - the requirement that should the railway close, the LPA will seek its retention as a continuous linear access route. These are all dealt with in more detail below. 'Replication' The railway will be reinstated around 80 years after it closed. In this intervening period of time many things have changed affecting the route of the former railway and the buildings and other structures associated with it. The use of the reinstated railway will also be subtly different. Although it will be available for 'A to B' transport, the majority of users will be visiting the railway as a recreational resource. We are committed to the reinstatement of the railway making the greatest contributions feasibly and practically possible to the cultural heritage of the Park, public enjoyment of the Park, and the economic and social well-being of Park communities. This commitment is clearly demonstrated by the recent re-construction of original Victorian carriages and the rebuilt original engines LYD and LYN. However, the requirement that the reinstatement should 'replicate the former narrow gauge railway including the line of the original route and the siting, design, appearance, floor space and materials of the associated structures / buildings. Any additional new development over and above the original historic former railway should provide demonstrable evidence that it is essential for the operation of the reinstated former railway or is a restoration of a historic feature and that there are no alternative solutions which would reasonably meet the need for the development in any other way' is unduly onerous. For instance the re-building of line-side platelayers huts would not be necessary and probably not permitted under modern safety legislation. The reinstatement is a complex proposal which must be ultimately viable in order to proceed and for its benefits to be realised. The reinstatement should, of course, enhance the special qualities of the Park. However, the fundamental requirement that it should copy the original railway in all aspects of its reinstatement, unless any additions are essential for its operation, and there is no alternative solution leaves insufficient space for accommodating the change which has occurred since the railway closed. It also ignores the wider and important point that the considerable benefits to the Park that the reinstatement the railway will bring are not wholly dependent on the extent to which it is able to replicate the original railway or not. The reinstatement of the railway needs broader consideration, yet replication is the main focus of Policy RT-S2. The reinstatement of the railway is part of the story of change in the Park, not just recreation of former times. Parking We find the stance of paragraph j) of Policy RT-S2 confusing, and so also the application of Policies AC-D2 and AC-D3 to the railway reinstatement. The termini of the reinstated railway will be points at which people change from one of a variety of modes of transport (car, bus, bike, walking) to another- the railway. The need for parking here will be a</p>

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		<p>necessary function of the railway reinstatement. We understand that, in general, parking provision should not cause harm to the special qualities of the Park, and therefore that it should take into account environmental constraints. What is at issue here is the capacity for parking without causing unacceptable harm- this is not the same as minimising parking. For the railway the objective of minimising parking makes no sense- it is a use which will generate a need for amounts of parking which can be predicted. If the provision of this parking is acceptable in terms of impacts on the environment of the Park then there should be no need to minimise it. Indeed it is hard to envisage how the railway might seek to do so, or if it did manage to do so undesirable unintended consequences might result - or example minimising parking at the Blackmoor Gate terminus could mean that the need for parking was transferred to Lynton end of the line, where there is little capacity for parking. We suggest that the same approach should apply to peak parking. If it can be provided without undue harm then is should, as the need for parking is a function of the use it serves and not the amount of parking itself. In addition, and without prejudice to the points above, the notions of average daily use annually and peak parking do not correspond well with the actual needs of the railway. The railway is closed for the majority of January, February, March, November and December. Some days of the week are also usually significantly busier than others, as are certain weeks and months. Thus the average daily use annually is not a good indicator of the parking needs of the railway on the days it is open. True 'peak' demand for railway parking will be on 'special occasion' days such as Galas. The railway does not intend to make provision for this on a permanent basis, and there are established acceptable overflow sites available for these uses such as the Exmoor Farmers market at Blackmoor Gate and the field at Caffyns Halt. However, there are certain times of the year and days when the railway is consistently busy and the need for parking will be greater than average measures, of whatever sort. It does not seem sensible or reasonable not to make provision for this maximum normal need if it can be done so without undue harm. A further dimension which might usefully be addressed is the distribution of parking across all the railway termini in the Park: Blackmoor Gate, Parracombe Halt, Woody Bay, Caffyns Halt and Lynton. The railway has some operational scope to direct its need for parking between these locations. Policy could require that the normal parking needs of the railway should be accommodated in the best distribution across these locations, taking into account the operational needs of the railway, and the wider benefits of the different options for the distribution of parking.</p> <p>Redundancy: Paragraph k) of Policy RT-S2 states that a legal agreement will be sought to ensure the line is retained as a continuous linear access route in the event that it becomes redundant. This is not workable, as the contracts for the purchases which the railway have</p>

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		<p>already made, and those it intends to make, often contain an agreement that the previous landowner may repurchase the land. In many cases this was a requirement of the sale. Had we been consulted about this proposed element of policy we would have been able to warn of its inoperability. It is, of course, perfectly sensible that the Plan should continue to safeguard the route should the railway become redundant. Paragraph b) i) of Policy RT-S2 requires that the reinstatement should 'Seek to re-use the original buildings associated with the former railway both within and outside the National Park.' (our emphasis). Buildings outside the National Park fall within the jurisdiction of a different planning authority. We are therefore unclear as to the intended purpose of this element of policy, or how it is envisaged it could operate.</p>
Mr Samuel Burgess	RT-S2 dlp617 Support	<p>I fully support the plans to reinstate the Lynton and Barnstaple Railway. I believe that doing so will: 1. Provide economic benefit to the whole area by improving transport into the National Park and thus stimulating and expanding tourism into the area for visitors. 2. At the same time providing access to Lynton for local residents which avoids using private cars and in the process relieving traffic flows into Lynton. I think L&amp;B should be encouraged to provide a small amount of parking at all Stations to support this objective.</p>
Mr Tim Lewis	RT-S2 dlp640 Support	<p>I very much support the reinstatement of the Lynton and Barnstaple Railway which will meet the objectives of the Plan. It will contribute to a sustainable economy by bringing tourists who will bring business for shops, cafés, B&amp;B's etc. It will bring also accessibility and great enjoyment of the magnificent scenery from the train ride (rather than from the private car). It should never have closed.</p>
Mr Ross Simmonds English Heritage South West	RT-S2 dlp740 Support	<p>We support these policies and text.</p>
Mr Andrew Austen North Devon Council	RT-S2 dlp866 Support	<p>The reinstatement of this route complements Policy BAR16 in the emerging North Devon and Torridge local plan.</p>
Mr Terry Loveless	RT-S2 dlp641 <b>Object</b>	<p>The policy plan has adopted the Lynton and Lynmouth Neighbourhood Plan to reinstate the former route of the railway at the rear of properties on Station Hill. I consider that these proposals require more details including the depth and position of the tunnel/cutting proposals to achieve the necessary levels required. The policy plan should make it clear that these proposals [are] not included.</p>

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Mr John Read	RT-S2 dlp643 Support	With the knowledge of the numbers of tourists attracted by the 'little railways' in Wales (Ffestiniog, etc.), the reinstatement of the previously much loved Lynton and Barnstaple Railway will be a boost to tourism in the Exmoor National Park worth, if any, environmental disruption and will create additional employment.
Mr Francis Smith	RT-S2 dlp659 Support	I am completely in favour of the reinstatement of the Lynton and Barnstaple Railway which would provide a considerable boost both to the economy and to tourism in North Devon where we have a holiday home.
Mr Alan Watkins	RT-S2 dlp660 Support	I write to commend you for your support of the possible reinstatement of the Lynton and Barnstaple Railway. As a former resident, it is my belief that it would not only enhance the park experience- as it does in Wales- but would become a major tourist attraction, attracting visitors from all over the country bringing financial gain with them.
Mr Reginald Weaver	RT-S2 dlp661 Support	Exmoor has always been a place of unique beauty for my family and we make regular short break visits. It is very good to see restoration enterprises getting under way which have the potential to attract both younger and older members of visiting parties, especially those proposals which might in the future provide a further public transport facility so that more areas can be reach without having to use a car. The proposed Lynton & Barnstaple railway scheme seems to fulfil that aim; furthermore, it would be very sympathetic to the landscape and general atmosphere of Exmoor, and would surely be of economic benefit to the Exmoor community- and thus in its way assist in helping the areas of self-sustenance.
Mr Martin White	RT-S2 dlp665 Support	I am a supporter of the Lynton & Barnstaple Railway Preservation Society and I would like to strongly put forward a proposal that there should within the new structure of the National Park be provision for the line to be rebuilt in its entirety. This would seem at the moment to be an impossible task in view of the length and some of the hurdles to overcome. However, might I compare this with the Welsh Highland Railway which has just been completed in North Wales and which was in a similar situation. My support for provision being made for the reinstatement of the Lynton & Barnstaple Railway is that in the situation that we all enjoy today with perhaps more leisure time, more and more people and their greater leisure time will invariably mean that greater use will be made of the National Park over a period of time. With members of the public and other visitors wishing to take advantage of the beautiful landscape and countryside which comprises the Exmoor National Park, the roads become very

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		crowded and bottlenecks form. If the railway is ultimately to be reinstated then hopefully the dependence on car usage will not be as great as there will be an alternative in that people will be able to catch a train, which of course, does far less damage to the environment. In North Wales, as your committee will be aware, it has been found that many people will use their cars to come into Snowdonia Park but will then park and will walk or use other means for visiting various aspects of the park. The train has assisted in this in that they can park at the railway station and walk to where they want to go, enjoy the countryside and then catch a train on the return. This then saves the car entering the National Park and contributing to any traffic problems. It is very hard to see what negative impact the reinstatement of the railway would have on the National Park. Your committee will be aware that when the inspector at the enquiry in North Wales concerning the rebuilding of the Welsh Highland Railway suggested that this should not be allowed, this was overruled by the Deputy Prime Minister in his capacity on the grounds that the line should be rebuilt as it would assist to solve traffic problems in Snowdonia National Park. Your committee will be aware that the Welsh Highland Railway has just received an award for the visitor attraction in North Wales for this current year. Hopefully this will be the position with regard to the reinstatement of the Lynton & Barnstaple Railway in the hopefully not too distant future.
<b>SECTION 10 – ACHIEVING ACCESSIBILITY FOR ALL</b>		
Alan Morgan	10 dlp404 Support	8. Utilities: Provision of electricity, water, communications networks and traffic management systems are an essential well thought out part of the plan.
Mr Roger White	10 dlp405 Support	I support the Draft Policy Plan as a whole. The reinstatement of the railway supports the plan objectives of building a sustainable economy via tourism and employment for businesses supplying and catering for services within the Park. The development of the railway is a spur to improve off-road accessibility for tourist activity helping to reduce traffic congestion in busy areas and promoting walking and cycling with safety for all.
Mr Andrew Austen North Devon Council	10 dlp867 Support	Support- chapter as a whole.
P.J. Jackson	Sustainable Transport dlp637 General Comment	The proposal for a light railway from Dulverton to Brushford and Exebridge continues to be a possibility as a benefit to the local community and a place of learning for the people living in the District.



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Mrs Christine Fitzgerald Porlock Parish Council	10.6 dlp568 General Comment	We agree that visitors to Exmoor should be encouraged not to use cars, but this is only practical if there is a good system of alternative public transport. We would hope for continued ENP support for the 300 bus service but feel that the circular bus route which used to be in operation should be investigated. Bus routes should be extensively advertised - at present this is not the case.
Nell Cruse Somerset County Council	10.8 dlp357 General Comment	The Council encourages ENPA to specify that electric charging points should be 16amp. This is because some electric vehicle models will not charge at 13amp.
Mr Bruce Nottrodt	AC-S1 dlp138 Support - subject to amendments	A balance is required so that economic development is not held back through access to the park becoming difficult
Mrs Christine Fitzgerald Porlock Parish Council	10.13 dlp556 General Comment	There should be more vigorous control of simple signage- there is not enough monitoring or enforcement at present and shops in particular are becoming festooned with advertising and posters. The regulations are there but not being enforced.
Mr Ross Simmonds English Heritage South West	AC-S2 dlp741 Support	We support this policy, particularly criteria a, b and c.
Mrs Jill Jones	AC-S2 dlp428 General Comment	Policy AC S2 g) addition Include damage to the local businesses as well as to the environment.
Mr Ross Simmonds English Heritage South West	AC-D1 dlp742 Support	We support this policy.
Nell Cruse Somerset County Council	AC-D1 dlp358 General Comment	The Council encourages ENPA to specify that electric charging points should be 16amp. This is because some electric vehicle models will not charge at 13amp. In addition, the NPPF tends to use the word 'severe' in this context, it may be helpful to use this wording here for sake of consistency.
Nell Cruse Somerset County Council	10.20 dlp359 General Comment	The A396 is not noted as a freight route in the Somerset Freight Map. Therefore, The Council would not promote its use by HGVs.

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Mrs Susan May Exmoor Trust	10.26 dlp319 General Comment	Road works and road closures are something which cause much anxiety and some hardship amongst local people. Diversions seem to be very lengthy in some cases and although I understand that diversions have to follow a similarly graded road to the one which is closed, especially for larger vehicles and lorries, surely there is a way of signing a shorter route for cars and smaller vehicles.
Mrs Christine Fitzgerald Porlock Parish Council	10.26 dlp569 General Comment	There are two errors in paragraph 10.26 last sentence 'The use of unsuitable..... will be discouraged' what?
Mrs Marilyn Crothers Nettlecombe Parish Council	10.27 dlp381 General Comment	10.27 - 10.34 To include tree planting to provide shade for vehicles. (Where shade is available it is popular with car owners)
Nell Cruse Somerset County Council	10.28 dlp360 General Comment	In allocating parking to certain users or groups, there is a need to consider the knock-on effects of any such scheme. It would be important to consider adverse impacts on the highway (and private property, or local businesses) caused by visitors displaced from these car parks and how they might be managed.
Mrs Christine Fitzgerald Porlock Parish Council	10.31 dlp570 General Comment	Para 10.31 there is reference to a table but the reference bracket is empty.
Nell Cruse Somerset County Council	10.31 dlp362 <b>Object</b>	It is not clear how the figures in 10.1 have been derived. There is a need for any parking standards to be clearly evidenced and based on current policy. Any such standards should be robust enough to be defended during the Local Plan examination process. The Council would encourage ENPA to re-examine these standards accordingly or alternatively adopt Somerset's Countywide Parking Standards, which have been produced on a needs-based basis and reflect current planning policy. Despite Exmoor sitting within two County Councils, the standards could be easily applied across the whole of the National Park area, not just the area within Somerset.
Mr Bruce Nottrodt	AC-D2 dlp139 Support - subject to amendments	Parking restrictions should not have negative effect on economic development or viability
Mrs Christine Fitzgerald Porlock Parish Council	AC-D2 dlp571 General Comment	Table 10.1: The table indicates that Hotels should have 1 parking space to every 2 bedrooms. We do not feel that this is enough anyway but in Porlock it is an unrealistic possibility since most Hotels fall far below this level.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Nell Cruse Somerset County Council	AC-D2 dlp361 Support - subject to amendments	It is disappointing to see that there are no parking standards for disabled users. Given the location and likely terrain of some locations, it is essential that the needs of the most vulnerable of society are met. The Council would encourage ENPA to include specific parking standards for disabled users to ensure these users are not omitted during the design of a development.
Mr Bruce Nottrodt	Electricity & Communications Networks dlp140 General Comment	In preparing this area of policy the ENPA should be mindful of increasing improvement of aerial and satellite based internet access.
Sir Andrew Burns	Electricity & Communications Networks dlp634 General Comment	Underlying all your ambitions and integral to achieving your objectives, is the requirement for much faster broadband access and much more comprehensive and reliable mobile phone telecommunications. Of course in a National Park, particular care should be taken over the visual and environmental impact, but your plan needs to give much greater priority and reflect a stronger sense of urgency of improved communications for this remote rural community. The issue is not about down-loading videos for home consumption, important though that may be for some families. The fundamental need is to overcome the geographic difficulties and ensure that mobile phone coverage is available in all parts of the Moor for residents and visitors alike and that homes and small businesses have direct reliable access to fast if not superfast broadband, without which banking, shopping, education, healthcare and employment become very difficult. We know from where we live on the outskirts of Wheddon Cross how inadequate and slow the broadband landlines are and how non-existent the mobile telephony is. One of us works from home for the British Government; the other has started up her own small business. The communications frustrations are frequent and aggravating. They are acutely felt by those of our neighbours involved in farming and the tourism business. We realise that the real responsibility may lie outside your own Authority with BT and its own sense of commercial priorities, but we do most strongly urge you to exert every pressure on the telecommunication companies and central Government to make a reality of Ministerial promises in rural as well as urban areas.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
National Grid UK Transmission	Electricity & Communications Networks dlp764 General Comment	<p>National Grid infrastructure within the Exmoor National Park Authority's administrative area</p> <p>Electricity Transmission National Grid has no high voltage electricity overhead transmission lines / underground cables within the Exmoor National Park Authority's administrative area.</p> <p>Gas Transmission National Grid has no gas transmission assets located within the administrative area of the Exmoor National Park Authority. Electricity and Gas Distribution Western Power Distribution owns and operates the local electricity distribution network in the Exmoor National Park Authority's administrative area. Wales and West Utilities owns and operates the local gas distribution network in the Exmoor National Park Authority's administrative area. Contact details for Western Power Distribution and Wales and West Utilities can be found on the Energy Networks website: <a href="http://www.energynetworks.org">www.energynetworks.org</a></p> <p>National Grid's National Parks Commitments National Grid is a member of the Corporate Forum for National Parks. We are committed to the protection and enhancement of the environment, always seeking new ways to minimise the environmental impacts of our past, present and future activities. We incorporate environmental considerations into all of our business activities and we monitor our environmental performance, audit the effectiveness of our management systems, and report our performance to our employees, shareholders, the public and other stakeholders. The main areas of our activities that may have an impact on National Parks are the development, maintenance and refurbishment of the gas and electricity transmission and gas distribution network infrastructure required to fulfil our statutory duties. We are committed to ensuring that all work carried out in, or affecting National Parks, is done in a manner which reflects the duties on National Grid under the National Parks and Access to the Countryside Act 1949 and other relevant legislation, including The National Parks (Scotland) Act 2000, in particular the duty to have regard to National Park purposes. National Grid has published a document which sets out our National Park commitments. The document is available at: <a href="http://www.nationalgrid.com/uk/LandandDevelopment/SC/NationalParksCommitments/">http://www.nationalgrid.com/uk/LandandDevelopment/SC/NationalParksCommitments/</a></p>
Mobile Operators Association Mobile Operators Association (MOA)	Electricity & Communications Networks dlp762 General Comment	Page 380 Footnote 454 Footnote reference 454 at the bottom of Page 380 provides the email address for the Mobile Operators Association however there is a small error (extra 'r' at the end of info) in the spelling and it should read: <a href="http://www.mobilemastinfo.com">www.mobilemastinfo.com</a>
Mobile Operators Association (MOA)	Electricity & Communications Networks dlp763 Support - subject to amendments	Policy AC-D4 Radio and Mobile Telecommunications Infrastructure While we support the inclusion of Policy AC-D4 on Telecommunications Infrastructure within the emerging Local Plan, we have the following concerns about the wording of the policy.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
		<p>Criteria 1 of Policy AC-D4: Criteria 1a-c of Policy AC-D4 provide a sequential approach to the assessment of options for telecommunications equipment however; we consider that the wording of this section is overly restrictive to the future rollout of telecommunications development. Criteria 1a and 1b of Policy AC-D4 state that Mobile Operators should first seek to share existing infrastructure where no structure height increase is required and that proposals located on existing buildings and trees will only be permitted where it can be demonstrated that installing equipment onto an existing mast is not possible. Paragraph 43 of NPPF states that existing masts, buildings and other structures should be used unless the need for a new site has been justified, but it does not specifically mention that the options should be assessed in a sequential order and there is no mention of restrictions on height increases of existing masts. It is considered that the sequential approach detailed in Criteria 1a-c of Policy AC-D4 does not provide enough flexibility for the different types of telecommunications solutions that are available. It is our opinion that the wording should be amended to allow greater design flexibility while also ensuring that the environmental impact of the development is kept to a minimum. For example, in some cases there could be a requirement to increase the height of an existing telecommunications mast to accommodate additional equipment; however, there is no allowance for this in Criteria 1a-c of Policy AC-D4. In accordance with NPPF, while the mobile operators will always seek to find a suitable solution using existing masts, buildings and other structures, there will still be instances where there is no viable alternative to installing a free standing ground based mast. Whilst careful consideration is given to the siting and design of any telecommunications development, we have concerns about Criteria 1c of Policy AC-D4 which states that the installation, 'will not be noticeable as a new telecommunications development.' It should be recognized that new telecommunications installations or upgrades to existing telecommunications equipment will almost always be noticeable from certain locations in the vicinity of the site. On that basis, it is considered that the requirement for installations not to be noticeable as telecommunications equipment is ambiguous and overly restrictive. This requirement would far exceed the provisions in paragraph 43 of NPPF which states that, 'equipment should be sympathetically designed and camouflaged where appropriate.' On that basis, we request that the requirement for telecommunications equipment, 'not to be noticeable' is removed from Policy AC-D4. Criterion 1b. of Policy AC-D4 states that apparatus will be sited on existing features such as buildings or trees to minimise adverse effects on landscape character. It should be noted that it is rare to find a tree which is suitable for the installation of telecommunications equipment and it should not be relied upon as a widespread solution. We suggest that the reference to 'trees' is replaced with 'other structures' in Criteria 1b of Policy AC-D4. As detailed on page 32</p>

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
		<p>of the Code of Best Practice 2013, planning policies should support economic growth in rural areas while also giving appropriate weight to conserving landscape and scenic beauty in National Parks. In order to provide a more supportive approach to telecommunications developments (in accordance with NPPF), while also accepting that particular attention will be required to minimise impact on the National Park through sensitive design and appropriate siting, we would suggest the following wording for Criteria 1 of Policy AC-D4: '1. Proposals for telecommunications development will be permitted provided that the following criteria are met: - a) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area; b) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building; c) if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority. d) The development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest. Criteria 3 of Policy AC-D4 Criteria 3 of Policy AC-D4 states that planning conditions will be used to ensure ongoing management to trees which provide camouflage to telecommunications equipment. Paragraphs 28 and 37 of Circular 11/95 relating to the Use of Conditions in Planning Permission confirm that conditions can only be imposed on land within the control of the applicant. While the Operators will accept planning conditions requiring the management of trees within their control, it would not be possible to enforce the management of trees which are outwith the Operator's control. On that basis, we would suggest that the wording of Criteria 3 of Policy AC-D4 is amended as follows: '3. A condition will be attached to any planning consent to ensure that there will be ongoing management in place where trees are essential in providing camouflage to antenna within trees or for masts disguised as trees, where the trees are located on land which is under the control of the applicant.' Criteria 4 of Policy AC-D4 In accordance with Paragraph 43 of NPPF, we recommend that an additional criterion is added to Policy ACD4 as follows: '4. When considering applications for telecommunications development, the planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology.' Summary In summary, while we support the inclusion of telecommunications Policy AC-D4 within the Exmoor National Park Draft Local Plan, we consider that the sections mentioned above are overly restrictive to telecommunications developments and contrary to</p>

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
		the provisions of NPPF. We therefore recommend that amendments are made as detailed above.
Brig. David Godsal Winsford Parish Council	Electricity & Communications Networks dlp625 General Comment	Improvements to the non-existent mobile phone coverage and the almost useless Broadband internet access are fundamental requirements to the businesses and indeed all individuals living in the National Park.
Mrs Susan May Exmoor Trust	10.37 dlp321 General Comment	With regard to accessibility for all, not only has the Exmoor Moorland Landscape Partnership Scheme funded the Moorland Classroom on line information package - available to all schools wanting to make a field trip to Exmoor, but it has also set up the scheme - Phototrails - for wheelchair users wanting to see the route on line before making the journey and thence being able to judge suitability. These are huge steps forward and should be championed.
P.J. Jackson	10.43 dlp370 General Comment	4. The humble telephone has been in use for many years and remains the most universal equipment for the present day.
Suzie Sinden	10.53 dlp244 Support	I am very much in favour of insuring that all inhabitants of the Park can access FAST Broadband. Essential to keep us up to the modern world, and for the increasingly only way to communicate with UK Government forms etc.
Mrs Marilyn Crothers Nettlecombe Parish Council	10.54 dlp385 General Comment	Broadband provision may well be more important for people living within E.N.P. than small scale renewable energy projects.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mike Highfield Somerset County Council	10.56 dlp253 Support	<p>The Exmoor Plan has, in 1.11 identified that the National Planning Policy Framework has a presumption in favour of sustainable development. A planning proposal needs to demonstrate that sustainable criteria exist in three dimensions and a planning officer is instructed to consider all three. The requirement for acoustic consideration in planning falls under the 'environmental role' within which are the objectives of 'contributing to protecting and enhancing our natural, built and historic environment'. The ministerial foreword to the NPPF defined and extended the role of planning from one of scrutiny to one resulting in enhancement and improvement of surroundings as indicated by the statement 'Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives'. To assist in this there is now a requirement for applicants to seek early technical advice (192) and a need for LPAs to adopt proactive roles at pre-application (189, 190, 191) that help applicants solve problems (187). I consider the Exmoor Plan provides planning officers with opportunity to minimise the impact of some development at a pre-application stage (5.63, 5.111, 6.150, 6.175, 9.74, 10.56, and 12.6) and stress the needs for more specific consideration of noise.</p>
Mrs Susan May Exmoor Trust	AC-S4 dlp320 General Comment	<p>The section of the Local Plan which caused the most responses from my Trustees is the lack of good provision of broadband and mobile phone signals. It is appreciated that Dr. Nigel Stone and David Wyborn are doing all possible to further this cause, but the Exmoor Trust is fully aware that it is the responsibility of the providers to improve the situation. Mr Michael Dunn - Regional Director of BT was heard to say only a couple of evenings ago that he hoped there would be provision and coverage for 96% of all rural areas by 2015. This would of course bring added business to Exmoor and huge improvements to those already here in the holiday and tourism trade - trying to compete with other areas of outstanding natural beauty, especially now we have dark skies status. It goes without saying that it would also be a huge benefit to those who work from home, those in the farming world, the elderly, emergency services and those trying to shop on line too.</p>



Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Western Power Distribution	AC-S4 dlp546 General Comment	AC-S4 (3): Western Power Distribution seek to confirm that policy AC-S4 (3) does not include local distribution on wood poles as the word 'high voltage' is anything above 1000 volts and would include 11kV and 33kV wood pole lines which exist on most of Exmoor and which are an essential requirement for Exmoor homes and businesses. Western Power Distribution request that the policy be amended to clarify that this policy does not include wood pole electricity distribution lines and only refers to pylon routes and transmission lines.
National Grid UK Transmission	AC-S4 dlp765 General Comment	Specific Comments National Grid notes the following proposed policies in the Draft Local Plan in respect of the provision of new and improved infrastructure: AC-S4 ELECTRICITY AND COMMUNICATIONS NETWORKS National Grid has made particular commitments in respect of National Parks (see above) and will seek to avoid major new developments in National Parks unless there are circumstances where a development is of national interest and no reasonably practicable alternative is available. In light of this, National Grid considers that the policies should more directly reflect the requirements of the NPPF which says that: 116. Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of: - the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; - the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and - any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
National Grid UK Transmission	AC-S4 dlp766 General Comment	Specific Comments National Grid notes the following proposed policies in the Draft Local Plan in respect of the provision of new and improved infrastructure: AC-D5 FIXED LINE TRANSMISSION INFRASTRUCTURE National Grid has made particular commitments in respect of National Parks (see above) and will seek to avoid major new developments in National Parks unless there are circumstances where a development is of national interest and no reasonably practicable alternative is available. In light of this, National Grid considers that the policies should more directly reflect the requirements of the NPPF which says that: 116. Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of: - the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; - the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and - any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.
Mr Ross Simmonds English Heritage South West	AC-S4 dlp743 Support	We support this policy.
Mobile Operators Association Mobile Operators Association (MOA)	AC-S4 dlp761 <b>Object</b>	Policy AC-S4 Electricity and Communications Networks Section 2a. of Policy AC-S4 states that; 'the location, siting, scale and design of structures will not cause any adverse impacts on landscape and/or seascape character' The wording of this criterion is considered to be overly restrictive on telecommunications development. In accordance with NPPF, the Mobile Network Operators aim to keep the environmental impact of communications infrastructure to a minimum. In some instances however, the provision of a high quality electronic communications network, in line with national policy, may result in some minor impact on the character or appearance of the surrounding area. In order to ensure that the policy is consistent with NPPF, we would also suggest a minor addition to the wording of criterion 2a. as follows: 'the location, siting, scale and design of structures will not cause any unacceptable adverse impacts on landscape and/or seascape character'
Mr Bruce Nottrodt	10.60 dlp141 Support	A rational and common sense approach

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mrs Christine Fitzgerald Porlock Parish Council	AC-D4 dlp572 General Comment	Radio & Mobile Telecommunications Equipment AC-D4 1(b) Is siting of heavy equipment on trees a good idea from a safety point of view?
Mr Ross Simmonds English Heritage South West	AC-D4 dlp745 Support	We support this policy.
Western Power Distribution	10.64 dlp547 General Comment	The Electricity Act 1989 allows service lines at low voltage and 11kV to single dwellings to be overhead without planning permission so a condition on new development may not be enforceable. Western Power Distribution also points out that it has an obligation to offer the most economic connection in terms to customers which may be through overhead lines.
Western Power Distribution	10.65 dlp548 General Comment	Western Power Distribution recognises the need to have regard for the National Park however, Western Power Distribution has a statutory obligation to operate an economic and efficient network. Western Power Distribution feel the wording in paragraph 10.65 is too strong and does not recognise the need to provide overhead lines where the cost of underground lines is prohibitive. Western Power Distribution request the Council amend the wording to recognise this matter.
Western Power Distribution	AC-D5 dlp549 <b>Object</b>	Western Power Distribution object to policy AC-D5 as a policy which requires power lines to only go underground directly conflicts with Western Power Distribution's legal obligations under the Electricity Act 1989. Whilst Western Power Distribution recognises the National Park's position with regard to environmental impact and their obligations under National Park legislation they request that the wording be changed to provide a more balanced policy which takes into account economic factors.
Mr Ross Simmonds English Heritage South West	AC-D5 dlp744 Support	We support this policy.
Mr Ross Simmonds English Heritage South West	AC-D6 dlp746 Support	We support this policy.
<b>SECTION 11 – EXMOOR’S SETTLEMENTS</b>		
Mrs Marilyn Crothers Nettlecombe Parish Council	11 dlp379 General Comment	Map 34/35 What are the small isolated red dots on these maps? Not itemized in the legend.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mrs Christine Fitzgerald Porlock Parish Council	11 dlp573 General Comment	The Porlock map needs to be amended showing the revised Conservation Area, but we know you are aware of this.
Mr Martin Wilsher West Somerset District Council	11 dlp806 <b>Object</b>	There are no development limits/boundaries shown for any of the settlements that are identified in Table 4.1. Some of the settlements are the same as those included in the extant adopted Local Plan (Exmoor National Park Authority; Exmoor National Park Local Plan (Including Minerals and Waste Policies) 2001-2011) - Adopted 2005: Written Statement-Proposals Map Including Settlement Inset Maps; Exmoor National Park Authority; 2006). An explanation as to the removal of the development limits from the new Local Plan should be included. If their removal is that the Local Planning Authority seek to regulate all future new development as an 'exception', this would suggest that the overall planning policy strategy for the National Park is one of no development. This would be contrary to the National Planning Policy Framework (NPPF) (Department for Communities and Local Government; National Planning Policy Framework - March 2012; Department for Communities and Local Government; 2012; ISBN 978 1 4098 3413 7) which seeks to enable and promote development in sustainable locations.
Mr Ross Simmonds English Heritage South West	11 dlp747 Support	We welcome the identification and characterisation of the settlements in the section. It usefully highlights what is important and forms a fundamental part of the positive and clear strategy for the historic environment as required by the NPPF, (NPPF, Paragraphs 9, 126 and 157). Where appropriate were conservation area appraisals and management plans used to inform this work?
Mark Funnell National Trust	11 dlp585 Support	Proposals Map: The National Trust supports the inclusion of Dunster Castle in the Historic Settlement Core of Dunster in Inset Map 2.
Mr John Heys	11 dlp586 General Comment	Please note that on Settlement Inset Map 14 (Parracombe) the route of the Lynton and Barnstaple Railway is incorrectly shown. It actually runs adjacent to Church Lane, between that lane and 'The Halt', rather than behind 'The Halt'. The correct route will allow the rebuilt L&B Railway to follow the historic alignment and re-use the surviving Parracombe Halt 1920s waiting shelter, in accordance with the stated aims of the Plan. Of course it may ultimately be necessary to deviate the route slightly in the event of local land acquisition issues, but the target should be to use the original alignment.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mr David Britnell	ES-S1 dlp433 General Comment	Although there is probably little that can be done at present, the shading of properties by large trees can be a real problem especially in hilly country.
Mrs Margaret Rawle	11.17 dlp627 General Comment	Public Transport. Hourly Bus service to Taunton and Regular Bus service to Minehead and Tiverton. No evening services. Occasional Bus service to Barnstaple via Community Bus.
Mr Martin Wilsher West Somerset District Council	11.2 dlp927 <b>Object</b>	Compared with the settlement hierarchy in the adopted Local Plan for the National Park [72 Exmoor National Park Authority; Exmoor National Park Local Plan (Including Minerals and Waste Policies) 2001-2011) - Adopted 2005: Written Statement; Exmoor National Park Authority; 2006], the village of Dunster appears to have been elevated in status to that of a Local Service Centre, alongside the settlements of, Dulverton, Lynton & Lynmouth and, Porlock. No justification is provided for this in the accompanying text. This raises a number of issues with respect to the older part of the settlement and, how it relates to the surrounding area in terms of the role and function it provides to these residents. - Whilst Dunster is one of the larger Parishes within the National Park in terms of population when compared with most of the other settlements, the figure is significantly reduced when the proportion of the residents living outside of the Exmoor National Park, particularly those living in the area known as Dunster Marsh, are excluded. Approximately 40% of the dwelling stock of the Parish is estimated to be outside of the National Park. This would reduce the number within it from 592 [73 Office for National Statistics; Neighbourhood Statistics - Dunster (Parish): Census 2011- Dwellings, Household Spaces and Accommodation, 2011 (Table KS401EW); Office for National Statistics; 2013 (data-set)] dwelling units for the whole Parish to 356 [74 West Somerset Council; WSC LPA Parish Census Data 2011, 2012 Dwelling Stock and, 2032 Projections; West Somerset Council; 2014] within the National Park. The proportionate reductions in population would be from 817 [75 Office for National Statistics; Neighbourhood Statistics- Dunster (Parish): Census 2011- Dwellings, Household Spaces and Accommodation, 2011 (Table KS401EW); op. cit] residents to c.490 [76 West Somerset Council; WSC LPA Parish Census Data 2011, 2012 Dwelling Stock and, 2032 Projections; op. cit]. In addition to this the Census data for Dunster Parish reveals that over 30% of the dwelling stock was not permanently occupied, reducing the total occupied stock to 412 [77 Office for National Statistics; Neighbourhood Statistics- Dunster (Parish): Census 2011- Dwellings, Household Spaces and Accommodation, 2011 (Table KS401EW); op. cit]. The unoccupied stock being comprised of vacant properties, holiday homes and 2nd homes. - Whilst the older part of Dunster village within the Exmoor National Park provides a number and range of social and community facilities that are found in the existing three Local Rural Centres [78 Exmoor National Park Authority; Exmoor National

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
		<p>Park Local Plan (Including Minerals and Waste Policies) 2001-2011)- Adopted 2005: Written Statement; op. cit.; pp.148- 196], the economic provision represented by retail and retail-related activities within the village, collectively, do not function in the same way as that provided in Dulverton, Lynton &amp; Lynmouth and, Porlock. These last three contain retail activities which specifically aim to cater for the basic economic needs of their respective local communities and the surrounding area as well as the visiting tourist community. The retail offer in Dunster village is primarily orientated at the visitor community rather than the local, resident, catchment community. These latter users are, therefore reliant for essential day-to-day needs on the services and facilities provided outside of the settlement/Parish, primarily in Minehead. - Implicit in the first sentence of the definition of a 'Local Service Centre' is the expectation that such settlements are expected to be the focus of future development within the National Park. However, the Landscape Sensitivity Study that forms part of the evidence-base informing the strategy and policies in the Local Plan [79 Paul Bryan - Landscape Planning; Landscape Sensitivity Study - Exmoor National Park Authority 2013: Dunster; Exmoor National Park Authority; 2013], suggests that the overall development potential of the part of Dunster village within the National Park, in landscape terms, is only an additional 22 new dwelling units. If correct, this could seriously inhibit the ability of the older part of the village to evolve and develop to meet the economic and social needs of the resident and surrounding communities in the way envisaged through its new status. Of concern to West Somerset Council as the Local Planning Authority (LPA) for those parts of the district outside of the National Park are the strategic and spatial consequences of this changed status for Dunster village within Exmoor. By elevating the settlement's status in this way, it is unlikely to alter the population of the village and surrounding communities within the National Park reliance on services and facilities, particularly economic, provided outside, primarily at Minehead. This could result in continuing and increasing traffic movements to and from Minehead, especially by the private car which would be contrary to trying to encourage more sustainable patterns of activity by local residents in and around Dunster. There is also the danger that where there is a need to rationalise social and community service provision for economic efficiency reasons, the facilities in Dunster are more likely to be vulnerable to closure than those in its larger neighbour. The outcome of this would be an increase in dependence by the local population on Minehead with the increased use of the private car in order to access the necessary services and facilities. Evidence of this can be found elsewhere in the National Park with the rationalisation of availability and accessibility to services provided by the Post Office in recent years. Also of concern to West Somerset Council, would be the consequential impact of the limited capacity of land and property in the older part of the village on that part of the Parish</p>

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
		<p>outside of the National Park, particularly at Dunster Marsh. This latter location is an area of residential development to the north of the main part of Dunster village. It is physically separated from the latter by the busy A.39 road and accessibility between the two is restricted to one narrow pedestrian underpass. There are no social and community facilities within the Dunster Marsh built-up area and the residents are heavily dependent on Minehead for access to most of these. The upgrading of Dunster to a Local Service Centre and, the absence of development opportunities within the older part of the village could put pressure for further larger-scale residential development at Dunster Marsh. This would be both undesirable and contrary to the sustainable development principles being pursued through the emerging West Somerset Local Plan [80 West Somerset Council; The West Somerset Local Plan to 2032 Revised Draft Preferred Strategy - June 2013; West Somerset Council; 2013] which seeks to focus the bulk of future development in the West Somerset LPA area within and immediately adjoining the three larger settlements of Minehead, Watchet and Williton. Dunster Marsh is identified as a settlement in the emerging Local Plan where development would only be permitted where there is a clearly identified 'local need'. It is suggested that if, because of the range of extant social and community services on offer the role and function of the settlement is deemed to be significantly different (and clearly justified) to that of those identified as 'Villages' in Table 4.1, it should be placed in a category of its own in a similar way as provision has been made for Porlock Weir. The spatial and strategic implications of the upgrading proposal in either form are a cross-boundary (LPA) issue that should be dealt with as part of the 'Duty-to-Co-operate' requirements of the Localism Act [81 H.M. Government; Localism Act 2011, Chapter 20; op. cit] legislation affecting the production of development plans. This has not happened to date on this matter and needs to be addressed.</p>
Jill Demirtges Dunster Parish Council	11.29 dlp636 General Comment	The Dunster Parish Council broadly supports the stated objectives of the Exmoor National Park Local Plan. In turn the Dunster Parish Council asks that Exmoor National Park Authority support the community of Dunster in achieving their aims as set out in the Dunster Action Plan contained within Section 11.29 of the Draft Consultation Document.
Mr Andrew Austen North Devon Council	ES-S2 dlp868 Support	Important for NDC to ensure that any proposals will not have adverse cross-boundary impacts.
Mr Andrew Austen North Devon Council	ES-S2 dlp869 Support	Support the Lyn Plan (Lynton & Lynmouth Neighbourhood Plan) taking priority over the Local Plan should a conflict arise between policies.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Susan Green Home Builders Federation	ES-S2 dlp759 General Comment	Paragraph 184 of the NPPF requires that Neighbourhood Plans should be aligned with the strategic needs and priorities of the wider area therefore Neighbourhood Plans must be in general conformity with the strategic policies of the Local Plan. The Neighbourhood Plan only takes precedence over non-strategic policies of the Local Plan (Paragraph 185) in the determination of decisions on planning applications (Paragraph 183). Therefore further consideration should be given to proposals under policy ES- S2 Lynton and Lynmouth Neighbourhood Plan to ensure that there is no over-ruling of the strategic policies of the Local Plan.
Mrs Christine Fitzgerald Porlock Parish Council	11.49 dlp574 Support	We were very pleased to see that the existence of the Porlock Visitor Centre has been acknowledged in the Local services as this Centre has been shown to benefit the village economy to a very great extent- not just for Porlock either, it promotes the whole of Exmoor and should continue to be supported as such by ENP.
Mrs Christine Fitzgerald Porlock Parish Council	11.52 dlp575 General Comment	We think a correction is required to the number of new affordable homes mentioned on page 255 - we think the figure is 14 not 15.
Marlene Allinson Cutcombe Parish Council	11.79 dlp289 General Comment	Cutcombe Map: the red cross-lined area is designated as 'an important visual amenity (YFE)'. We understand that 'YFE' means that someone at the Your Future Exmoor event asked for this designation to be assigned to this piece of land. Was anyone else in the Parish consulted and what does this designation mean in practical terms? Can the designation be challenged? We understand that your Landscape Officer has assessed this designation using criteria as set out in para 7.226 pp178/9 and is happy with this designation. Roads: the use of yellow as an infill to minor roads/tracks/private roads etc. is somewhat arbitrary (e.g. the privately-owned bridleway into Raleigh Manor is marked in yellow as is the adopted road into Meadow Close and the road into the Cutcombe Market site)? Perhaps some standardisation and clarification is needed here? Luckwell Bridge: cannot find a reference to this part of Cutcombe Parish: as this is not classed as a settlement would it be possible for a local person to build a local, affordable needs, house for occupation at Luckwell Bridge or is the 'no development' policy set in stone?
Marlene Allinson Cutcombe Parish Council	ES-D2 AREA dlp291 General Comment	Land to the North of Cutcombe First School, as shown on Inset Map 10, is allocated for an extension to the school site and school playing field.' Clarification of the word 'allocated' would be useful as this land is not owned by the school but in private ownership (p261). We understand that the school has been consulted and said that this wish this designation to remain on this land.



Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mike Willes	ES-D2 dlp328 <b>Object</b>	I note that the School Field at Wheddon Cross is being put forward as an Important Visual Amenity Space (YFE). There is already a community Safeguard on part of the field. As the owner of this field I see no reason for this piece of land to be given any higher protection than any other piece of land in or around Cutcombe or Wheddon Cross, the land is used as agricultural land at present and I have no desire at the current time to change that. If the land was going to be built on etc. it would require planning permission before such action so why does it need a higher status?
Mr Robin Ashburner	11.90 dlp632 General Comment	The village does get a reasonable round up but you seem to leave out the main sports area. I refer, of course, to the sports ground, cricket, croquet and youth club facilities and buildings at the top of the village behind the church and near to Westcott Mead. As to the future of the village- there is little doubt it is at present on the 'brink'. The petrol section of the garage has closed, the PO has lost most of its services and may well close. How the village survives depends on the National Park Authority. We desperately need new sources of employment, this in turn means some kind of small industrial units. The Park owns the only suitable area (the Auction Field) in the village. If a small number of units (affordable industrial units) could be organised, this for Exford would be the equivalent to a heart transplant. Everything is possible - I was once told by the Exford PC that it was impossible to get new affordable houses built in Exford. I took up the challenge and in a short time the houses at Westcott Mead were underway. Everyone, except possibly the Exford PC, were helpful so it can be done but frankly the two Parish Councils of Exford and Simonsbath are best left out of any plans if you wish to go forward. With the houses in Exford, I called a public meeting without consulting the PC, we had a full house in the village hall - 98% agreed with what we were doing which shut up the organisations that were objecting to our plans. Both villages [Exford and Simonsbath] have a future but not as museums.
Mr Robin Ashburner	11.126 dlp633 General Comment	On the details you mention regarding Simonsbath - you fail to mention the church (St Luke's). This is the one public building in the village, used not only for village meetings but for the festival as well as for church services. On the plan you show the car park to the south of the church but you do not show the ring road up to the church a vital element when it comes to wheelchairs, etc. What Simonsbath does not need is another white elephant. The Sawmill is fantastic, but should all that money have been spent on something that is open one day a month. What really needs to happen is that it is open to the public one day a month but that for the other thirty or so days it is used productively for some suitable light industry such as gate making. I mention gate making because I know someone who tried to obtain (rent) the mill for just that use. The Park had the chance to turn this building from a white elephant into a

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
		vibrant useful space offering employment. With the new project at White Rock, we cannot tolerate more of the same. The possibilities are excellent, but it does depend on the Park setting out with a fresh aim, I suspect from the recent meeting that this is what is proposed. From my experience the best plan is to back away from either PCs and involve the public. When I did up the church (St Luke's) which I took from a building on the closure list to its present vibrant place, I held meetings of the whole village. 75% of the population came each time, everything then became possible. Both villages [Exford and Simonsbath] have a future but not as museums.
Brig. David Godsall Winsford Parish Council	Settlement Analysis dlp619 General Comment	Table 11.1: Computer Centre is now closed and converted to affordable housing. Where there was a daily Post Office it is now only open for 2 hours, 2 days a week. Table 11.2: Affordable housing need in Winsford is currently satisfied but will undoubtedly grow, so 6 is a reasonable estimate. We question the capacity of 20, where would these be built? There is already planning permission for 6 more in Darby's Knap but we are concerned at the prospect of any further in-filling.
Marlene Allinson Cutcombe Parish Council	11.220 dlp290 General Comment	Having public toilet provision is listed in Table 11.1 p286 ff: does this mean that ENPA values such provision and will help to support it in the light of proposed future closures of these facilities by West Somerset Council?
Mrs Pamela Scragg Old Cleeve Parish Council	11.220 dlp656 General Comment	Correction: No bus service for Roadwater. Correction: No Daily bus > 5x a day (NB a number of other entries in this column appear anomalous). Correction: No public toilets in Roadwater.
Mrs Pamela Scragg Old Cleeve Parish Council	11.224 dlp655 General Comment	There is a need to make consistently clear throughout this Local Plan that the 'capacity' for development identified in the Landscape Sensitivity Study is 'landscape capacity' only, as the study itself makes explicit. Although this is clear in some paragraphs, in others it is not, especially where reference is made to 'overall capacity'. A solution for the present paragraph would be to insert 'in landscape terms' after 'each settlement'. Thereafter, it would be helpful to make consistent use of the term 'landscape capacity' rather than just 'capacity' when referring to this study (see paragraphs 5.18, 5.146, 5.148, notes 273 and 309, paragraphs 7.85, 11.224, and table 11.2, including main heading). NB reference in note 57 has the wrong date and reference in note 146 has the wrong title and date.

Full Name Company / Organisation	Reference Point ID Type of comment	Representations and Suggested Amendments
Mrs Pamela Scragg Old Cleeve Parish Council	11.224 dlp657 General Comment	Because these are only figures quoted on the capacity of settlements for development, they take on undue prominence. Given their limited scope they offer no meaningful representation of a settlement's overall capacity for development but they may be taken to indicate precisely this. You might consider the removal of this table. The data is freely available in the published study itself on the Park's website where it is fully contextualised and less susceptible to misunderstanding. If the table is not removed, then it would be useful to clarify in 11.224 that the study does not take account of other factors, as you do on the website.
<b>SECTION 12 – ANNEX 1: THE CONDUCT OF ARCHAEOLOGICAL WORK AND HISTORIC BUILDING RECORDING WITHIN EXMOOR NATIONAL PARK</b>		
Mr Ross Simmonds English Heritage South West	12 dlp748 Support	We support the inclusion of this Annex and the approach it outlines. It is very useful and provides clear guidance to applicants and forms a fundamental part of the strategy for the historic environment.
Mike Highfield Somerset County Council	12.6 dlp254 Support	The Exmoor Plan has, in 1.11 identified that the National Planning Policy Framework has a presumption in favour of sustainable development. A planning proposal needs to demonstrate that sustainable criteria exist in three dimensions and a planning officer is instructed to consider all three. The requirement for acoustic consideration in planning falls under the 'environmental role' within which are the objectives of 'contributing to protecting and enhancing our natural, built and historic environment'. The ministerial foreword to the NPPF defined and extended the role of planning from one of scrutiny to one resulting in enhancement and improvement of surroundings as indicated by the statement 'Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives'. To assist in this there is now a requirement for applicants to seek early technical advice (192) and a need for LPAs to adopt proactive roles at pre-application (189, 190, 191) that help applicants solve problems (187). I consider the Exmoor Plan provides planning officers with opportunity to minimise the impact of some development at a pre-application stage (5.63, 5.111, 6.150, 6.175, 9.74, 10.56, and 12.6) and stress the needs for more specific consideration of noise.