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PART A

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Development Plan examination.

Full Name	Tessa Saunders
Address	[REDACTED]
Postcode	[REDACTED]
Telephone	[REDACTED]
Email	[REDACTED]
Organisation (if applicable)	Exmoor National Park Authority
Position (if applicable)	Senior Planning Officer (Policy/Community)
Date	14.12.16

PART B

Please complete Part B overleaf, identifying which paragraph your comment relates to by completing the appropriate box.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies through the examination.

The majority of examinations are expected to be through written representations. However should the Inspector decide there is a need for an oral examination, please state below whether you would like to participate.

- No, I do not wish to participate at an oral examination
- Yes, I wish to participate at an oral examination

Please note the Inspector will determine whether an oral examination is necessary.

If an oral examination is require, please outline why you consider that your participation is necessary.

To which part of the Neighbourhood Development Plan document does your representation relate?

Paragraph Number		Policy Reference:	EN2	Map	
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Do you support, oppose, or wish to comment (Please tick one answer)

- Support
- Support with modifications
- Oppose/Object
- Have Comments (about The Plan, Examination or Referenda)

Please give details of your reasons for support or opposition, or make other comments here: Please be as precise as possible

Whilst the National Park Authority are supportive of the Stogumber Neighbourhood Plan in general; the policy in relation to the location of new development has a very wide interpretation that could result in different forms of new development occurring in the open countryside.

National Park purposes are to conserve and enhance their natural beauty, wildlife and cultural heritage and to promote opportunities for the understanding and enjoyment of their special qualities by the public. National Parks and Areas of Outstanding Beauty have the highest status of protection in relation to landscape and scenic beauty¹. National guidance states that the legislation underpinning AONBs and National Parks (Section 85 of the Countryside and Rights of Way Act 2000) and Section 11A(2) of the National Parks and Access to the Countryside Act 1949, require that 'in exercising or performing any functions in relation to, or so as to affect, land' in National Parks and Areas of Outstanding Natural Beauty, relevant authorities 'shall have regard' to their purposes. The 'have regard' duty is relevant in considering development proposals that are situated outside National Park or Area of Outstanding Natural Beauty boundaries, but which might have an impact on the setting of, and implementation of, the statutory purposes of these protected areas.

It is recognised that the defined neighbourhood area consists of the area of Stogumber parish which lies outside the National Park boundary; however, the Authority suggests that the policy should have appropriate safeguards relating to the protection of the setting of the nationally designated landscape of the National Park (to be consistent with the adopted West Somerset Local Plan policy NH14 Nationally Designated Landscape Areas), as it is not clear where there are sites that have been previously used for mineral extraction or land that was formerly occupied by agricultural buildings within the designated neighbourhood plan area.

There is also no evidence or justification to clarify what type of development may be supported on greenfield sites in 'exceptional circumstances' in order to provide a clear basis for decision-making.

¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf, paragraph 115

Please set out what change(s) you consider necessary to enable the plan to proceed, including any suggested revised wording of any policy or text, related to the objection you have raised. You will need to say why this change will enable the plan to proceed. Please be as precise as possible.

What improvements or modifications would you suggest?

The Authority proposes that Policy EN2 is modified to include a policy test to ensure that regard will be had to the statutory purposes of the National Park, to avoid harm and to ensure that the impacts of development proposals on the protected areas and their setting will be acceptable – modification suggested as follows:

Proposals for new development should ensure that they will not conflict with the achievement of the National Park's statutory purposes and do not harm the setting of the National Park, including views into and out of the designated landscape.

If you have additional representations this form can be reproduced for each item. Please make sure any additional pages are clearly labelled and attached.

To which part of the Neighbourhood Development Plan document does your representation relate?

Paragraph Number		Policy Reference:	EN7	Map	
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Do you support, oppose, or wish to comment (Please tick one answer)

- Support
- Support with modifications
- Oppose/Object
- Have Comments (about The Plan, Examination or Referenda)

Please give details of your reasons for support or opposition, or make other comments here: Please be as precise as possible

The Authority supports policy EN7 Renewable Energy for small-scale on-site renewable energy, including wind turbines. However, we suggest that the first bullet point of the policy includes reference to the protection of the setting of the National Park to be consistent with the West Somerset Local Plan policy NH14 Nationally Designated Landscape Areas, and to link to the suggested modification to Policy EN2.

Please set out what change(s) you consider necessary to enable the plan to proceed, including any suggested revised wording of any policy or text, related to the objection you have raised. You will need to say why this change will enable the plan to proceed. Please be as precise as possible.

What improvements or modifications would you suggest?

Amend the first bullet point to read:

- *the proposals would not have ~~significant harmful~~ unacceptable adverse impacts on the landscape, including the setting of the National Park, or built character of the area (Policy EN2);*

It is considered that the change to terminology is clearer for the decision-maker.

If you have additional representations this form can be reproduced for each item. Please make sure any additional pages are clearly labelled and attached.