

EXMOOR NATIONAL PARK AUTHORITY

2 July 2013

PLANNING COMMITTEE

DRAFT EXMOOR LOCAL PLAN FOR CONSULTATION

Report of the Head of Planning and Sustainable Development

Purpose of Report: To inform Members of progress in preparation of the Draft Exmoor Local Plan and to seek approval to undertake a formal public consultation process of the Exmoor Local Plan.

Authority Priority: Maintain our Core Services – Working with the community and business. The vision and objectives for the Exmoor National Park Partnership Plan and the Draft Local Plan were formulated and consulted on together. The vision and objectives have been approved and are now published in the Exmoor National Park Partnership Plan. The Draft Local Plan provides explanatory text to expand on the vision as set out in the Partnership Plan and will assist with the delivery of many Partnership Plan targets.

Legal and Equality Implications: The two purposes of the National Parks are to:

- conserve and enhance the natural beauty, wildlife and cultural heritage; and
- promote opportunities for the understanding and enjoyment of the special qualities of National Parks by the public.

Section 62, 11(A) of the Environment Act 1995 confers a duty on certain bodies and persons to have regard to the purposes for which National Parks are designated. These include that:

(1) The National Park Authority, in pursuing National Park purposes, shall seek to foster the economic and social well-being of local communities within the National Park, should co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the area of the National Park.

(2) In exercising or performing any functions in relation to, or affecting land in a National Park, relevant authorities should have regard to National Park purposes. Under the Act a 'relevant authority' includes any public body and this includes any local authority.

Additionally, Section 65(4) Environment Act 1995 – provides powers to the National Park Authority to “do anything which in the opinion of the Authority, is calculated to facilitate, or is conducive or incidental to-

(a) the accomplishment of the purposes mentioned in s. 65 (1) [National Park purposes]

(b) the carrying out of any functions conferred on it by virtue of any other enactment.”

The National Park Authority has a statutory duty, as Planning Authority, to produce a Local Plan for the planning authority area. The Local Plan will form the development plan for the area of the Exmoor National Park. The development plan guides and is the first consideration in determining planning applications for land use and development. Legally,

planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise.

Local plans must be positively prepared, justified, effective and consistent with national policy in accordance with section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) and the National Planning Policy Framework.

The Localism Act 2011 (Section 110) introduces the 'duty to cooperate' in relation to planning of sustainable development. This includes engaging constructively with neighbouring planning authorities and other interested bodies in relation to strategic matters in the preparation of development plan documents.

Planning policies can have a considerable impact on an individual's ability to use their land and property and this may be considered to infringe human rights. In particular, in relation to Article 1 (Protection of Property) of Part II of the First Protocol, however the draft policies of the Local Plan are considered to be proportionate and control the use of land and property in accordance with the general public interest.

Financial and Risk Implications: The production of the Local Plan through to adoption is a considerable project and involves related expenditure. Care is being taken to ensure that all procedures are followed and the evidence base is established to help minimise the risk that the Local Plan will be found unsound at Inquiry.

RECOMMENDATIONS: To APPROVE the draft Exmoor Local Plan for public consultation and to DELEGATE to the National Park Officer authority to:

- make any necessary revisions as required;
 - add amendments to accord with any Sustainability Appraisal or Habitats Regulations Assessment recommendations;
 - provide introductory chapters and to include a spatial portrait of the National Park; and
 - provide Proposals Maps for consultation.
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1 INTRODUCTION

- 1.1 The Exmoor National Park Authority, as the Planning Authority for the area, has a statutory duty to prepare, monitor and review a Local Plan for the Exmoor National Park. The current Local Plan policies are saved and the Policy and Community Team have been working to produce a new Draft Local Plan in consultation with Members of the Local Plan Advisory Group. There has been considerable public engagement through the earlier part of the process particularly through the "Your Future Exmoor" consultation events. The responses to this consultation, experiences from using the 2005 Local Plan and evidence from reports and research, and further Government guidance from the NPPF have all helped shape the new draft Local Plan.
- 1.2 The Plan provides a vision and objectives/priorities which set out what the National Park Authority want to achieve over the lifetime of the Plan. It also provides strategic planning policies, which set out the strategic approach and the framework for neighbourhood development, and development management policies which provide more detailed guidance on planning for the Exmoor National Park Planning Authority Area. The Plan will be accompanied by a set of proposals maps.

- 1.3 The draft policies are intended to ensure that Exmoor has a sustainable future, socially, economically and environmentally. Exmoor is a National Park and conserving and enhancing the high quality environment is an overriding purpose; however whilst protecting and enhancing that environment, the Plan also seeks to allow development to meet social and economic needs of local communities. The Plan has an emphasis on local needs affordable housing but also seeks support for the wider community through specialist housing, extended family housing, principal residence housing and succession farming. The Plan also seeks to foster business development, giving flexibility over the use of some guest accommodation, encouraging working from home and helping to ensure the roll-out of broadband and mobile phone infrastructure.
- 1.4 The next sections of the report summarise how the draft Local Plan is configured and the nature of Plan topics.

2 THE PLAN

- 2.1 The policies within the Plan constitute an overall approach to conservation and enhancement, and future development in the Exmoor National Park. It is important that the Plan is read as a whole. A practical consequence of this is that several policies may apply to one proposal but in order to keep the document concise, cross referencing of policies is only used where another policy is directly relevant. Therefore all policies should be considered where they are relevant to a particular development proposal. In particular, the General Policies set out an overarching approach which will be relevant to all proposals in the Exmoor National Park Planning Authority area.
- 2.2 National policy contained in the National Planning Policy Framework will also form material considerations when determining planning applications. Agencies or documents to which applicants should refer when developing a proposal and which will also be used in decision making are referred to and/or referenced alongside the policies.
- 2.3 The Plan contains a vision and strategic priorities and objectives which are shared with the Partnership Plan. These were consulted on in the Autumn of 2011. The vision and objectives have been approved and are now published in the Exmoor National Park Partnership Plan. The Draft Local Plan, in addition to the vision, provides explanatory text to expand on the vision as set out in the Partnership Plan. Amendments are incorporated in the explanatory text of the vision where appropriate.
- 2.4 A spatial portrait is intended to be inserted in section 3 and this will provide a description of the area including Exmoor's distinctive characteristics as well as challenges and issues that Exmoor will have to face over the Plan period. An introduction will also be set out at the beginning of the document.
- 2.5 The Strategic Policies and Development Management Policies are set out in eight sections of the document. The eight sections are as follows:
 1. General Policies
 2. Conserving and Enhancing Exmoor
 3. Responding to Climate Change

4. Achieving a Thriving Community
5. Achieving a Sustainable Economy
6. Achieving Enjoyment for All
7. Achieving Accessibility for All
8. Exmoor's Settlements

General Policies

- 2.6 These policies form the basis of all development in the National Park and will therefore apply to all planning decisions. Policies GP1: National Park Purposes, GP3: Major Development, and GP5: Planning Obligations, were consulted on along with the vision and objectives and strategic options consultation which took place in the autumn of 2011. Amendments from this consultation are shown in the policies. This section now also includes a Model Policy on sustainable development (GP2), which is a requirement of Government; the spatial strategy for the National Park (GP4); and an enhancement policy (GP6).

Conserving and Enhancing Exmoor

- 2.7 Policies in this section consider the National Park's landscape and character of its buildings and settlements as well its natural environment. Policies also cover Exmoor's dark night sky, green infrastructure, conversions and alterations of buildings, and design. Exmoor National Park Authority is the Minerals Planning Authority and policies on minerals are also considered in this section. Key changes from the 2005 Local Plan are the introduction of a core Dark Night Sky Area following the designation of Exmoor as a Dark Night Sky Reserve.

Responding to Climate Change

- 2.8 This section sets out the Planning Authority's approach to climate change adaptation and mitigation, coastal change and pollution, and renewable energy. Exmoor National Park Authority is the Waste Planning Authority and policies on waste are also set out in this section. The policies provide a more refined approach and include policies on green infrastructure for the first time.

Achieving a Thriving Community

- 2.9 This section covers the housing policies and considers the provision and funding of affordable housing. It also provides policies on extensions, conversions, subdivision, replacement dwellings and outbuildings. It seeks to address certain housing issues for rural workers, farming, families and travelling communities. Local commercial services and community facilities are also considered along with residential institutions. Key changes are the introduction of viability assessments for certain housing developments, the need for principal residence housing in certain cases, extended family dwellings, a policy on travelling communities and specialist housing.

Achieving a Sustainable Economy

- 2.10 The Planning Authority's strategic approach to the economy is set out in this section. Policies on business development in local service centres and villages are considered along with business development in the open countryside. Home based businesses are given even more encouragement and existing employment land and buildings safeguarded. Agricultural and forestry development is considered at the end of the section.

Achieving Enjoyment for All

- 2.11 Policies on tourism and visitor accommodation are set out in this section and include policies on serviced and non-serviced accommodation as well as camping barns, camping, caravan and touring sites. There is a dedicated policy on “glamping”, more flexibility in terms of some guest accommodation, along with safeguarding land along former railways and the reinstatement of the Lynton and Barnstaple Railway.

Achieving Accessibility for All

- 2.12 The Exmoor National Park Authority’s strategic approach to transport is set out in this section along with policies on traffic management and parking provision. Policies on communications networks including the encouragement of the provision of broadband and mobile phone infrastructure are set out at the end of the section.

Exmoor’s Settlements

- 2.13 This section sets out information that applies to the defined settlements within the National Park. Information is provided on the setting, built environment and local services of each settlement. Inset maps are provided for each settlement showing particular areas of importance for environmental or social reasons. Policy ES-S1: Supporting Local Communities sets out provision for advice and support to communities that have identified priorities and plans for development they need to sustain their settlements over the longer term. Policy ES-S2 provides support for the Lynton and Lynmouth Neighbourhood Plan. Key changes have been the involvement of the Parish/Town Councils with the draft of the “Supporting Local Communities” section and the introduction of a further lower settlement tier of Rural Communities where single local needs affordable dwellings will be possible. Porlock Weir is identified for the first time in the settlement hierarchy.

Consultation with Members

- 2.14 Members of the Local Plan Advisory Group (LPAG) have considered and signed off the policies set out in the Draft Local Plan and further refinements have been made following these meetings. However, it should be noted that Members of LPAG have not considered the following policies, which have recently been drafted:

1. Section 4: GP2: Model Policy
2. Section 7: HC-D18: Residential Institutions
3. Section 10: AC-D3: Temporary Parking Policy

- 2.15 In editing the final document for consultation, further revisions or amendments are likely to be required as legislation and Government advice is evolving. The National Park Authority Officer seeks delegated authority to make these revisions as appropriate.

Evidence and previous consultation

- 2.16 The Draft Local Plan has been produced on the basis of evidence preparation and a number of previous consultation exercises and consideration of the responses received. There is some outstanding work in progress to underpin the Local Plan including specific evidence in relation to Housing, Gypsy and Traveller Assessment, Open Space Strategy, Orchards Study, Ecological Networks and an Infrastructure Delivery Plan.
- 2.17 Strategic options for the Plan were consulted on in autumn 2011 and included options on location of development and delivery of affordable housing. The Plan will

put forward an explanation as to why certain options have been included or excluded where appropriate.

3 SUSTAINABILITY APPRAISAL AND HABITATS REGULATIONS

- 3.1 The National Park Authority is required to test the emerging Local Plan against a set of sustainability objectives, to consider the implications of the proposed policies and strategy against social, economic and environmental criteria. The sustainability appraisal (SA) (attached to this report) fulfils the requirements of Government policy (including requirements for Equality Impact Assessment (EqIA) and Health Impact Assessment (HIA)), and European legislation in the Strategic Environmental Assessment (SEA) Directive. A separate Appropriate Assessment required under the Habitats Regulations has also been undertaken.
- 3.2 The SA has been undertaken by an external consultant in consultation with ENPA staff, using the framework set out in the SA Scoping Report, testing the draft policies against the sustainability objectives and criteria. A number of changes have been made to the draft policies in the light of the sustainability appraisal. These changes are highlighted in blue. The SA report will be available on the ENPA website as part of the consultation.
- 3.3 The Habitats Regulations Assessment (HRA) (attached to this report) has also been undertaken by an external body and changes have been made to the draft policies. These changes are shown in purple.
- 3.4 Officers will still need to make some further changes as a result of the SA and HRA following the Planning Committee meeting on 2 July. Officers seek authority from the Planning Committee to delegate any additions or revisions arising from the SA and HRA to the National Park Authority Officer.

4 DUTY TO COOPERATE

- 4.1 National Park Authority officers have met with District Council officers to discuss strategic matters in relation to the preparation of Exmoor National Park Local Plan, North Devon and Torridge Local Plan and West Somerset Local Plans. These initial meetings have been effective in highlighting particular issues and approaches. It is noted that particular areas of relevance discussed at these meetings and through previous consultation responses, have been addressed in the Draft Plan.
- 4.2 National Park Authority Officers have also met with other interested bodies to discuss strategic matters. The duty to cooperate will be furthered through the consultation of this Draft Local Plan, together with future arrangements to demonstrate that there has been constructive engagement in the development of strategic policies during the formative stages of the plan process.
- 4.3 Joint commissioning of evidence to inform individual plans on key issues can also be used to demonstrate the duty to cooperate. The Authority has worked in partnership with North Devon, Torridge, West Somerset and (formerly) North Cornwall Council on commissioning the Strategic Housing Market Area Assessment (SHMAA) and development of the Strategic Housing Land Availability Assessment (SHLAA) methodology and with West Somerset Council on the Retail Study and the Flood Risk Assessment.

5 NEXT STAGES

- 5.1 The Exmoor Local Plan is a very important document to help guide development on Exmoor in the years to come. Final revisions to the Draft Local Plan will continue over future months and officers will continue to complete the evidence base to support the Plan. An introductory section and spatial portrait will be drafted and a set of proposals maps produced. Any revisions or amendments arising from the SA and HRA will be included. Officers will continue to work with the Local Plan Advisory Group throughout this period and will also discuss with the Working Group details for the Local Plan consultation which is envisaged to take place in autumn 2013. The Committee is asked to agree the recommendation and allow the Draft Local Plan to go forward to consultation.

Jo Symons
Policy and Community Manager
20 June 2013

**Sustainability Appraisal
Draft Exmoor National Park
Local Plan**

Including Minerals and Waste Policies

Non Technical Summary

For Exmoor National Park Authority

**Clare Reid Consultancy
June 2013**

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Appendix 1 Sustainability Appraisal Framework

Appendix 2 Summary SA table for Policies

Appendix 3 Summary SA table for Settlements

1. INTRODUCTION

1.1. What is a Sustainability Appraisal?

- 1.1.1. Exmoor National Park Authority is preparing its Local Plan which will guide development in the National Park over the next 20 years. The National Park Authority is required to test the emerging Plan against a set of sustainability objectives, to consider the implications of the proposed policies and strategy against social, economic and environmental criteria. The aim is to ensure that the Plan has as many positive effects as possible, and that any potential negative effects are identified so that changes can be made to the draft Plan to avoid these effects.
- 1.1.2. This document is the non-technical summary of the Sustainability Appraisal Report for the draft Exmoor Local Plan. It summarises how the sustainability appraisal has been carried out, the main findings and next steps. The full Sustainability Appraisal Report provides further details and is available on the website at www.exmoor-nationalpark.gov.uk/planning.

1.2. What is the Local Plan?

- 1.2.1. The Local Plan is a planning document that sets out the overall vision and objectives for the National Park and provides policies that will guide how this will be achieved. The Plan sets out a Spatial Strategy for where development will and will not be allowed, and a set of General Policies, which will be applied to all development requiring planning permission within the National Park. More detailed policies set out how development should conserve and enhance Exmoor, respond to climate change, support a thriving community and sustainable economy, enable enjoyment for all (through recreation and tourism), and accessibility for all (through transport and communications). The overall aim of the Local Plan is to ensure that any new development will help to achieve the National Park purposes and deliver sustainable development.
- 1.2.2. The Local Plan includes both strategic policies and development management policies. It has to be set within national planning policy, as set out in the National Planning Policy Framework. The NPPF states that the purpose of planning is to help achieve sustainable development, with three integrated elements – an economic role, a social role and an environmental role.

1.3. Why is a Sustainability Appraisal needed?

- 1.3.1. All plans, programmes and strategies with an impact on the environment are required by European Directive 2001/42/EC, to undergo a Strategic Environment Assessment. The purpose of SEA is to assess where the Plan may have negative environmental effects, and to consider alternatives to avoid or reduce these.
- 1.3.2. The SEA process has been integrated with sustainability appraisal (SA) to achieve a more wide-ranging assessment of sustainability incorporating environmental, social and economic objectives. The SEA criteria have also been developed to include the requirements of Health Impact Assessment (HIA) and Equality Impact and Needs Assessment (EINA) (as required by the Equality Act 2010). A separate assessment has been carried out in accordance with the European Habitats Directive.

1.3.3. The assessment plays an important role in producing the Local Plan, by informing decision making. The draft Sustainability Report will be consulted on along with the draft Local Plan. A final Sustainability Report will be produced along with the adopted Local Plan.

2. METHODOLOGY

2.1. How was the Sustainability Appraisal carried out?

2.1.1. The Sustainability Appraisal has been carried out as an integral part of developing the Local Plan with the aim of promoting sustainable development through the integration of social, environmental and economic considerations. It has been undertaken by an external consultant in consultation with ENPA staff. It is required by government through legislation and is subject to the same level of public consultation and scrutiny as the Local Plan.

2.1.2. There are a number of stages required for the appraisal:

- Phase 1 – deciding the scope of the appraisal (2010)

This set out what the appraisal should cover, reviewing a wide range of policy documents, monitoring and evidence to identify what the key sustainability issues affecting Exmoor are. A SA framework was developed, with a set of sustainability objectives and criteria to guide the preparation of the draft Plan. These were set out in a Scoping Report and consulted on.

- Phase 2 – considering broad options and alternatives (2011/12)

In preparing the draft Local Plan, a broad range of options and alternatives were considered. This included options for where development could go, alternatives for how affordable housing could be delivered, and the policy approaches that would help deliver sustainable development on Exmoor. The options were subject to SA and public consultation.

- Phase 3 – assessing the draft Plan & consulting on the draft Plan and Sustainability Report (2013) *the stage we are at now*

Following consultation on the options, the preferred strategy and policies were developed to form the draft Local Plan. Each of the policies have been assessed to consider the environmental, social and economic effects, and recommendations made to avoid or mitigate any potential adverse impacts. The draft Plan and Sustainability Report will be subject to informal public consultation during the autumn of 2013.

- Phase 4 – Publication of the Plan and Sustainability Report, and submission to Government

The results of the draft Local Plan consultation will be taken into account and the Plan will be amended in the light of this. The National Park Authority will then publish the Plan and formally consult on it along with the Sustainability Report. The Plan will then be submitted for examination.

- Phase 5 – Public Examination

The Local Plan and consultation responses will be considered by a Planning Inspector and a public examination held. The Inspector may make recommendations for amendments to the Plan some of which are binding and others will be subject to the discretion of the National Park Authority.

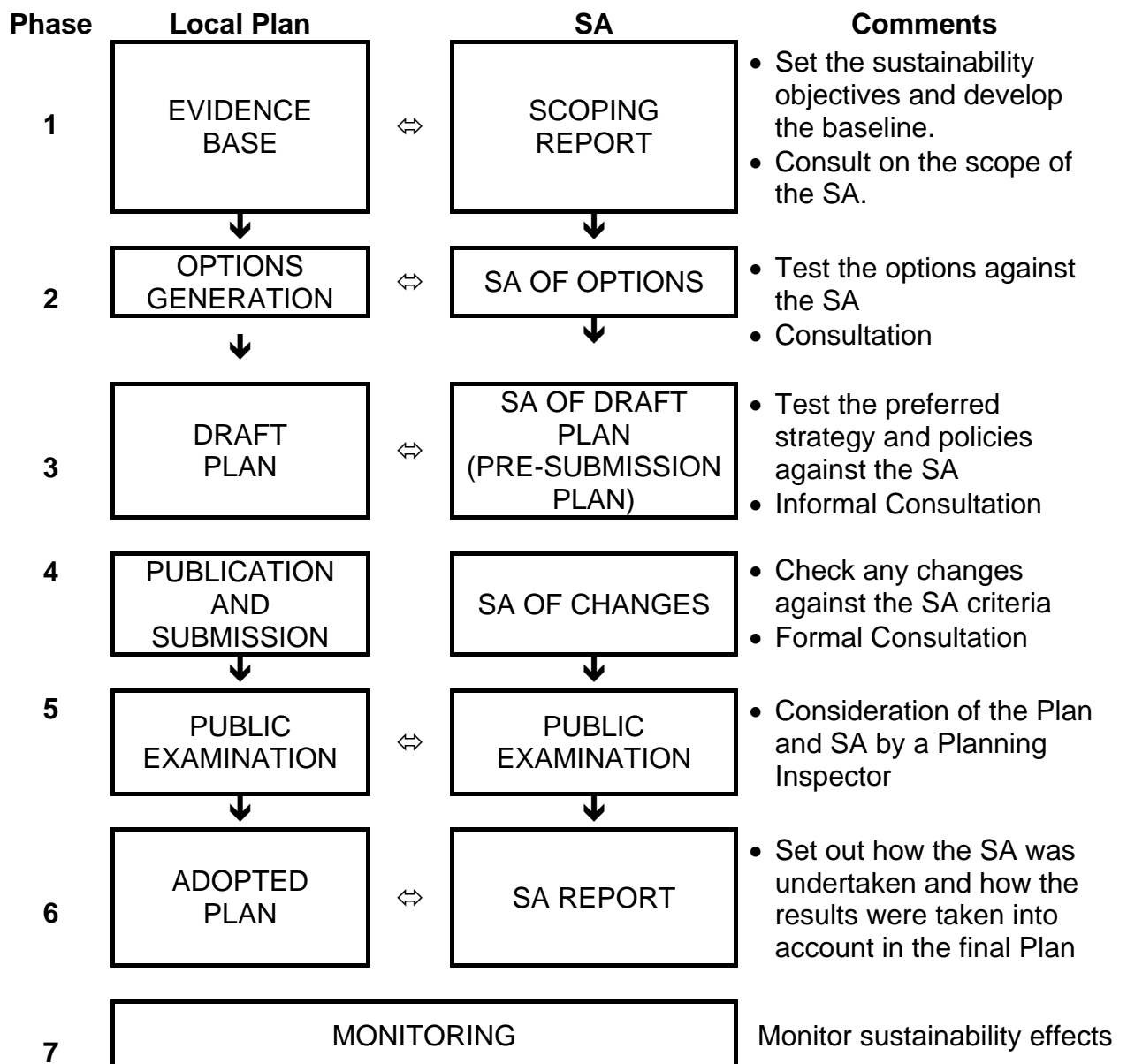
- Phase 5 – Adoption of the Local Plan

The final changes will be made to the Local Plan before it is formally adopted by National Park Authority. A final Sustainability Appraisal Report will be produced.

- Phase 6 - Monitoring implementation of the adopted Plan.

Once adopted, the effects of implementing the Local Plan will be monitored to ensure that no significant negative or unforeseen effects on the sustainability objectives occur, or to enable these to be addressed if they do arise.

Figure 1 – Summary of key stages in the Local Plan process and SA



2.2. The Sustainability Appraisal Framework

2.2.1. The SA framework was developed during Phase 1 to provide a set of sustainability objectives and criteria to use when considering whether each draft policy and option would have positive or negative effects. This includes considering impacts on:

- Air & water quality
- Biodiversity & green infrastructure
- Climate change adaptation & flood risk
- Climate change mitigation & energy
- Community & wellbeing
- Economy & employment
- Historic environment
- Housing
- Land
- Landscape
- Coast
- Transport

The full set of sustainability objectives is given in **Appendix 1**.

2.2.2. The potential impact of each policy and option was considered against these objectives, and given an overall score. The scoring system is set out in **Table 1** below.

Table 1 – SA scoring system

++	Strongly positive
+	Positive (with some opportunity for improvement)
+/-	Some positive elements but also potentially some negative impacts
0	Neutral
-	Negative
- -	Strongly negative

3. SUSTAINABILITY APPRAISAL

3.1. What are the main sustainability issues affecting Exmoor?

- 3.1.1. Exmoor has a high quality natural and built environment and offers a high quality of life for the majority of its residents. These factors also contribute to it being a popular destination for tourists and day visitors. The local economy is dominated by tourism, the service sector and land based industries. There is a strong sense of community with local traditions and ways of life. Like many parts of the UK there is an ageing population, but this is more pronounced on Exmoor.
- 3.1.2. There are positive issues including improvements in the condition of many wildlife sites and heritage assets. Air and water quality are generally good. Visitor numbers and spend are increasing, and employment rates are low. However, there are also some key sustainability issues, which the Local Plan seeks to address, including:
- The provision of affordable housing to meet local needs. Exmoor is one of the most unaffordable places to live in the country, with high prices driven by the high quality environment, compared to the low average wages which makes it difficult for local people to access open market housing. There is a particular need for affordable housing for young people, working age adults and families, as well as flexibility in the housing stock to provide for the needs of older people and those with specific needs.
 - The lack of suitable land for development due to a variety of constraints including topography, landscape sensitivity, environmental designations, and flood risk.
 - Maintaining local services and facilities. Given the rural nature of the National Park and a dispersed settlement pattern, it is difficult to maintain the provision of services and facilities such as shops, schools and health services, although in some cases the influx of visitors and tourists during the main holiday season helps to sustain many of these services.
 - Supporting local economic development. The importance of tourism and land based industries to the economy of Exmoor is well understood, and they are closely linked to the maintenance of the National Park's special qualities. However this dependency upon traditional economic sectors also contributes to issues such as low income and skill levels, which along with the current global economic crisis, climate change, social and demographic changes (such as an ageing population), pose challenges for the future.
 - Protecting the historic environment while still allowing for change. Exmoor's settlements and wealth of historic buildings are one of its most important features but the historic character of buildings and settlements is easily eroded by small changes over time as well as by new development, unsympathetic modernization or simply by neglect.
 - Maintaining the valued landscape character and features including the sense of openness on the moor, and tranquillity. Changes in technology and the needs of society mean that new challenges are constantly arising for example in relation to renewable energy, infrastructure for broadband and mobile communications, or even active recreational pursuits. Changes in farming are

also transforming Exmoor's landscape such as the subdivision of farms, the increase in commercial shooting and associated development, equestrian development, and farm diversification.

- Protecting and enhancing wildlife and the natural environment. Exmoor has a wealth of biodiversity and it is important that development does not negatively impact upon important habitats and key species. However it is not sufficient just to avoid impacts, development should also provide opportunities for enhancement including through the provision of habitats or open spaces, and the inclusion of wildlife friendly measures such as bat or bird boxes in buildings. Such measures individually and collectively help to strengthen ecological networks.
- Encouraging sustainable transport. The rural nature of much of Exmoor and its dispersed population mean that the majority of people rely on the private car to access jobs, services and facilities, or to visit Exmoor. Although levels of traffic are not a constant problem, there are issues of congestion in some of the popular destinations during the peak holiday periods. Maintaining public transport provision is also a constant challenge due to cutbacks in public sector funding. However, opportunities for walking, cycling, horse-riding are well served by the public rights of way and open access network.
- Responding to climate change. National Parks are expected to lead the way in demonstrating how society can adapt to changes in climate such as extreme weather events and flood risk. This brings opportunities but also challenges, particularly as a number of settlements are at risk from flooding from rivers or the sea, and traditional buildings can be difficult to adapt without damage to their historic fabric or character. The National Park also needs to build resilience in terms of how wildlife, landscape and the historic environment can adapt to climate change.
- Helping to mitigate future climate change. Exmoor is already in the forefront of measures to reduce damaging greenhouse gas emissions, including through carbon storage in peat and woodlands. Again there are opportunities, for example encouraging the use of sustainable building methods and design, but there are also challenges such as accommodating renewable energy technologies without damaging the landscape or historic character of buildings and settlements, and encouraging sustainable modes of transport.
- Maintaining the quality of Exmoor's natural resources such as air quality and water resources. Whilst air and water quality on Exmoor are generally good, it is important that development does not affect this either through individual proposals, or the cumulative effect of a number of developments over time. The implications are not just local, as Exmoor is also an important source of water for large numbers of households in Somerset and Devon.

3.2 What are the main sustainability effects of the draft Plan?

3.2.1 Exmoor is designated as a National Park due to its high quality natural beauty, wildlife and cultural heritage. It has two statutory purposes to conserve and enhance those assets, and to enable people to understand and enjoy them. These purposes are supplemented by a duty to support the wellbeing of local communities and local economic development. The Local Plan is a key mechanism for delivering these

purposes and duty, and consequently the sustainability objectives feature strongly throughout the draft Plan.

- 3.2.2 The potential sustainability effects of the draft Local Plan were assessed using the SA objectives and criteria. A summary of the main effects is given in Table 2 below. For the full assessment please refer to the main Sustainability Report.

Table 2 – Summary of key sustainability effects

+ Likely positive effects
<ul style="list-style-type: none"> • The focus on the provision of local needs affordable housing will support local communities and businesses • Positive for inclusive communities through provision of specialist housing for older people, those with disabilities and other specific needs • Additional flexibility to change between uses of buildings which could help to provide additional affordable housing, or support local businesses and jobs • Positive for conservation and enhancement of the landscape, tranquillity and natural beauty of the National Park • Positive for protection and enhancement of wildlife and the natural environment including through the provision of habitats, open spaces, and other measures which strengthen ecological networks • Positive for the historic and built environment including flexibility in the use of traditional buildings to support their maintenance and bring some back into viable use • Supporting the local economy through encouraging local employment including home based businesses • Positive cumulative effects for tourism and recreation through diversification and flexibility to allow change of use, supporting the local economy and enjoyment of the National Park • Support for broadband and other telecommunications will be positive for local communities and businesses
+/- Uncertain or mixed effects
<ul style="list-style-type: none"> • The relatively limited capacity of greenfield land for affordable housing could be used up at a faster rate due to the allowance of cross-subsidy from open market housing • Uncertain impact on retention of community services and facilities although the settlement strategy and policies seek to support this • Uncertain delivery of affordable housing due to public funding cuts and viability of schemes, although measures are in place to address this including cross-subsidy by open market housing • The Plan does not allocate employment sites as evidence does not suggest need for this, with uncertain effects on jobs and businesses, although a flexible approach to support appropriate business development is encouraged. • Renewable energy is positive for climate change mitigation and local communities but its scope may be limited in the National Park to avoid impacts on landscape and historic environment

- Likely negative effects

- Limitations on the overall provision of housing due to constraints such as topography, landscape sensitivity, environmental designations and flood risk
- Restrictions on large scale development due to the National Park designation will limit some economic development and jobs, although this will help to protect the natural beauty, wildlife and cultural heritage which are important to the local economy as they attract people to visit and enjoy the National Park
- Impacts on traffic and parking as there is no provision for peak parking demand although temporary solutions will be sought locally

3.3 Summary of the assessment of the draft Plan against the SA topics

- 3.3.1 An overall assessment of the draft Plan against each SA topic is given below. The assessment of each policy against the SA objectives is summarised in **Appendix 2**. The assessment of the settlements identified in the spatial strategy is summarised in **Appendix 3**. A full explanation of the assessment is given in the main SA Report.
- 3.3.2 **Air Quality and Water Resources.** Overall the impacts of the draft Local Plan on air quality and water resources are either positive or neutral. There are two policies which could have negative impacts, but recommendations have been made to mitigate against these (see Table 3 below). Air and water quality on Exmoor are generally good, and the levels of development are not likely to be of a sufficient scale to negatively impact on this, although in some popular tourism destinations there are potential issues for air quality arising from pollution from traffic and congestion during the peak holiday periods. Safeguards are in place through policies such as CC-S5 Pollution and AC-S1 Sustainable Transport. There are also safeguards to prevent water pollution for example in relation to agricultural slurry and wastes, and enhancements such as the remediation of contaminated land and other measures to improve the quality of the environment.
- 3.3.3 **Biodiversity and Green Infrastructure.** Exmoor has a wealth of wildlife, with nearly a third of the National Park protected under international or national designations for its wildlife value. The draft Local Plan is generally very positive for biodiversity, geodiversity and green infrastructure, particularly the General Policies which apply to all development. There are also specific policies that protect wildlife and habitats, and encourage enhancements such as the provision of habitats and wildlife friendly measures in developments including bat or bird boxes (CE-S2 Biodiversity). The provision of green infrastructure such as natural habitats, amenity green spaces and wildlife corridors is also encouraged (CE-S3 Green Infrastructure, CE-D2 Green Infrastructure Provision). There is one policy which may have negative impacts but recommendations have been made to mitigate against these (see table 3 below). The spatial strategy includes some settlements where there are wildlife protected areas, and development could be constrained in these areas as a result. *Note – a separate Habitats Regulation Assessment has been undertaken to consider the implications of the draft Plan for internationally important habitats.*
- 3.3.4 **Climate change adaptation and flood risk.** Overall the draft Plan is either positive or neutral in relation to climate change and flood risk. There are two policies which could have negative impacts, but recommendations have been made to mitigate against these (see Table 3 below). There are specific policies which encourage

proposals to adapt to the consequences of climate change, including avoiding areas at risk of flooding, and promoting land management to reduce the risk of flooding (CC-S1 Climate Change, CC-D1 Flood Risk). Many of Exmoor's heritage assets are vulnerable to climate change, and safeguards are included in the policies to enable measures that allow heritage assets to adapt, providing these changes do not cause inappropriate or damaging alterations. Some communities are at risk from coastal change, particularly Porlock Weir, so there is flexibility in the draft Plan to enable to respond to this in a planned way (CC-S2 Responding to Coastal Change). The spatial strategy (GP4) includes some settlements where there are areas at risk of flooding, and development could be constrained in these areas as a result.

- 3.3.5 **Climate change mitigation and energy.** The draft Plan is mainly positive or neutral in relation to climate change mitigation and energy, although there are some mixed or unknown potential effects. Future changes in climate are likely to affect all aspects of the National Park – its natural beauty, wildlife and cultural heritage, the special qualities that people visit to enjoy and understand, and effects on local communities and economic activity. The main sources of emissions of greenhouse gases on Exmoor related to development are from energy and transport, principally arising from the burning of fossil fuels for domestic heating, commercial sectors and vehicle movements. Whilst some of these impacts are not within the control of the planning system, the draft Plan includes policies and measures to seek to reduce carbon emissions including through reducing the need to travel, encouraging energy efficiency and appropriate renewable energy technologies, and supporting carbon storage. However the implementation of these policies could be limited by the protection of the National Park's special qualities for example in relation to renewable energy, and also the rural nature of National Park and dispersed settlement pattern which, along with the limitations of public transport provision, mean that a significant proportion of journeys are likely to be made by private car. There could also be potential negative impacts from tourism and recreation development which attracts significant additional numbers of visitors leading to increased greenhouse gas emissions from traffic, or cumulative impacts arising from more intensive use or larger scale developments. However, there are policy safeguards against such impacts and overall levels of development within the National Park are likely to be low. Consequently it is not considered likely that there will be significant increases in carbon emissions.
- 3.3.6 **Community and Wellbeing.** The draft Plan is very positive for the local community, supporting affordable housing for local people, employment opportunities, community services and facilities, and a high quality natural and built environment. Whilst overall levels of development will not be high, the draft Plan introduces additional flexibility for development to help maintain thriving communities, for example through the provision of affordable housing including specialist housing and extended family dwellings. Policies to support open spaces and access to recreation will help encourage healthy lifestyles, and protecting the tranquillity of the National Park will also contribute to wellbeing. The settlement strategy includes a wide range of settlements to enable communities to meet their needs and also where possible to support the maintenance of services and facilities. The effects in relation to community benefits from renewable energy are uncertain, whilst the policies support schemes that provide benefits for communities

in principle, there could still be some limitations to the scale of such schemes due to environmental protection.

- 3.3.7 **Economy and Employment.** The draft Plan is positive for the economy and employment as it seeks to encourage development which will help strengthen and diversify the Exmoor economy and sustain the high quality environment of the National Park. There is one policy which could have negative impacts (see Table 3 below). The economy is largely driven by the tourism and agriculture sectors, which are also closely linked to protection and enhancement of the National Park. Development therefore needs to be appropriate in terms of its location, scale and type to ensure that it adds to the special qualities of the National Park rather than detracting from it. There will consequently be mixed sustainability effects of some policies, for example large scale development will be constrained within the National Park, potentially limiting employment and economic development, but this will help to protect the natural beauty, wildlife and cultural heritage and therefore maintain the assets that attract people to visit and enjoy the National Park.
- 3.3.8 **Cultural Heritage and Historic Environment.** Exmoor has a rich cultural heritage and a valued historic environment comprising a range of historic settlements, buildings and landscapes which together make up Exmoor's 'heritage assets'. The draft Local Plan is generally very positive for cultural heritage and the historic environment, particularly the General Policies which apply to all development. There are also specific policies to conserve and enhance cultural heritage and the historic environment (CE-S4 Cultural Heritage and Historic Environment, CE-D3 Conserving Heritage Assets), including measures to bring heritage assets that are redundant or at risk back into viable use, providing this is consistent with their conservation. There is one policy which could have negative impacts, but recommendations have been made to mitigate against this (see Table 3 below). The spatial strategy includes some settlements where there are significant heritage assets, including a number of Conservation Areas, and development could be constrained in these areas as a result.
- 3.3.9 **Housing.** This SA objective and criteria were identified in recognition of the lack of affordable housing on Exmoor. There are specific policies to support the delivery of affordable housing to meet local needs, however the approach is not to allocate sites or set housing targets, due to the lack of suitable sites. The delivery of affordable housing is on an 'exception site' basis across the National Park in accordance with identified local affordable needs in an area. The focus is on providing for local needs affordable housing, either through new build or conversions, with the potential for a limited element of market housing (with a principal residence tie) where it can be demonstrated as a requirement to enable delivery of affordable housing which cannot be made financially viable without it. Focusing on local needs affordable housing will generally be positive for the SA objective, as this is where the need has been demonstrated. However, as the approach is needs led, there are unlikely to be significant numbers of new housing (either new build or conversions), leading to some mixed or uncertain effects in relation to the sustainability objectives. The location and amount of housing may be constrained by protection of the natural and historic environment in some cases, as well as consideration of flood risk, as a number of settlements have areas at risk of flooding. There are two policies which could have negative impacts, but recommendations have been made to mitigate against this (see Table 3 below).

- 3.3.10 **Land.** The draft Plan is generally positive in relation to land. One of the key considerations has been the limited capacity for development due to constraints of topography, landscape and so on and therefore the approach taken is to ensure that the best use is made of the limited supply of suitable land. The only exception to this is specialist housing, where an element of open market housing is allowed to cross-subsidise this, which could require additional land-take. The spatial strategy identifies a wider range of settlements, which increases the overall level of land available for development. The approach to promoting the use of existing buildings will also help to reduce land-take for new development. There is recognition that large scale development (including mineral extraction) will not be appropriate in the National Park given its designation, and this will also help to safeguard land. There is one policy which could have negative impacts, but recommendations have been made to mitigate against this (see Table 3 below).
- 3.3.11 **Landscape.** Exmoor was designated for its natural beauty and the conservation and enhancement of landscape quality is fundamental element of the draft Local Plan. The policies are generally very positive for landscape, particularly the General Policies which apply to all development. There are also specific policies that protect landscape character and tranquillity, particularly Exmoor's dark night sky as the National Park is designated a Dark Sky Reserve (CE-S1 Landscape Character, CE-D1 Protecting Exmoor's Dark Night Sky). The approach to housing, employment and development is influenced, and in some cases may be constrained by, the capacity of the landscape to accommodate development. This has also influenced the identification of settlements, informed by the Landscape Sensitivity Study. The settlements identified have some capacity for development, but in some cases this may be limited to only affordable housing to meet the parish's own needs due to landscape sensitivity. The policy approach of promoting the reuse of existing buildings will also help to minimise visual impacts and detrimental changes to landscape character.
- 3.3.12 **Coast.** Exmoor's wild undeveloped coast with dramatic high cliffs and headlands are highly important for their scenery, wildlife and sense of tranquillity and remoteness. The draft Local Plan is positive in relation to protecting and enhancing coastal areas. Although there is no longer a specific coastal zone identified, the coastal landscape character types identified in the Landscape Character Assessment will inform policy and development management decisions, including impacts on seascapes. There are specific policies to direct development away from vulnerable coastal areas and to protect coastal communities, particularly those such as Porlock Weir that are at risk of coastal change due to sea level rise (CC-D2 Coastal Development, CC-S2 Responding to Coastal Change).
- 3.3.13 **Transport.** The rural nature of the National Park and its dispersed population and settlement pattern pose challenges in terms of reducing the need to travel and encouraging more sustainable modes of transport. Levels of traffic on Exmoor are not generally problematic, although there are localised problems of congestion and parking in some settlements during peak holiday periods. The draft Plan seeks to encourage sustainable transport and reduce the need to travel through specific policies (AC-S1 Sustainable Transport, AC-S3 Traffic Management and Parking) and also the spatial strategy (GP4), with the local services centres identified as the most suitable places for development to consolidate employment, housing and services. Some of the villages identified also function collectively by sharing their facilities, and a number are served by public transport. The smaller rural

communities identified may have opportunities for limited development to sustain the local community over the long term. Overall levels of development in the National Park are likely to be limited, and so the cumulative impacts on transport are not considered to be significant. The only caveat could be in relation to tourism and recreation development if a new attraction draws in significant numbers of visitors, or more intensive use of existing facilities causes increased traffic, but this would need to be carefully assessed through a Travel Assessment or Statement, and if necessary a Travel Plan. There are two policies which could have negative impacts, but recommendations have been made to mitigate against this (see Table 3 below).

3.4 Mitigation measures

3.4.1 Table 3 below identifies the policies that could potentially have negative impacts, and the mitigation measures proposed by the SA to avoid these. In the majority of cases, negative impacts will be avoided if the recommendations are adopted. The SA also identified many other recommendations that have helped to strengthen the sustainability outcomes of the draft Plan (for example changing neutral scores to positive, or strongly positive). Details are given in the full SA Report.

Table 3 – Policies with potential negative impacts and mitigation measures

Policy	SA topic	Assessment	Recommended mitigation
CE-S2 Biodiversity	Land	The re-use of land and buildings can conflict with biodiversity objectives where there is existing biodiversity value.	Include reference in the text to ensure that the re-use of buildings and previously developed land includes careful assessment of any existing wildlife interest
	Transport	The protection of important habitats and species could constrain access and recreation, particularly where species are sensitive to disturbance.	None proposed. The National Park statutory purposes are to conserve landscape, wildlife and cultural heritage; and promote understanding and enjoyment. However, the 'Sandford principle' would be applied where these conflict, giving greater weight to conservation of biodiversity

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Policy	SA topic	Assessment	Recommended mitigation
CE-S4 Cultural Heritage and Historic Environment CE-D3 Conserving Heritage Assets	Transport	The historic nature of many of Exmoor's settlements and buildings restricts opportunities for transport improvements, measures to ease traffic congestion, new car parks and so on	None proposed. The conservation and enhancement of the historic environment would be given great weight in consideration of any transport proposals
CE-S8 Major Mineral Extraction	Air quality and water resources Biodiversity and Green infrastructure	The policy sets out that it is not considered appropriate or necessary to allow major mineral extraction within the National Park. However, if in exceptional circumstances this is allowed, safeguards are required to ensure that operations do not cause adverse impacts	Amend policy to require safeguards to human health and the natural environment during operation of the site if, in exceptional circumstances, permission is granted for major mineral extraction
CC-D6 Sewerage Capacity and Sewage Disposal	Housing	The policy could potentially result in proposals for affordable housing being refused due to proposals only being permitted where the existing sewerage infrastructure has the capacity, or measures will be put in place, to cope with additional demands.	Amend the policy to avoid affordable housing (which is otherwise acceptable) being refused due to sewerage constraints. Alternative measures such as the provision of septic tanks, could be considered in order enable the affordable housing to be permitted
HC-D3 Specialist Housing HC-D8 Extended Family Dwellings	Cultural Heritage and Historic Environment	The conversion of existing older or traditional buildings for specialist housing could result in damaging alterations which affect the character and fabric of the building for example widening doorways and other measures to enable easier access.	Cross-refer to CE-S4 Cultural Heritage which affords appropriate protection to buildings of historic, architectural interest.

Policy	SA topic	Assessment	Recommended mitigation
	Climate Change Adaptation and Flood Risk	Specialist housing proposals would need to take particular account of flood risk and climate change adaptation requirements (for example in relation to heating and cooling) given the potentially higher risk if vulnerable people such as the elderly or disabled were occupants	Refer to CC-S1 Climate Change, CC-D1 Flood Risk to ensure proposals take account of flood risk and climate change adaptation requirements
HC-S6 Travelling communities	Air quality and water resources Climate Change Adaptation and Flood Risk	The policy covers provision of sites for travelling communities. Whilst there is currently no identified need for sites on Exmoor, if circumstances arise where a site is required to address a proven local need, then this would need to include provision of suitable water and sewerage infrastructure to ensure there are no adverse impacts on water resources or air quality. There would also need to be an assessment of flood risk given the vulnerability of the use as caravan or mobile home sites intended for permanent occupation are regarded to be at higher risk (classified as 'highly vulnerable' in national guidance).	Add reference in supporting text to include provision of suitable water (CC-D3 Water Conservation) and sewerage infrastructure (CC-D6 Sewerage Capacity and Sewage Disposal) to ensure there are no adverse impacts on water resources or air quality. Add reference in the text to consideration of flood risk, Policy CC-D1.
HC-D19 Important Visual Amenity Space	Housing	The protection of visual amenity space could prevent housing development particularly given the constrained nature of many of Exmoor's settlements	None proposed. The policy approach is addressing other sustainability objectives particularly the protection of amenity spaces that are important for community wellbeing, landscape and wildlife

Policy	SA topic	Assessment	Recommended mitigation
AC-S3 Traffic Management and Parking AC-D2 Parking Provision and Standards	Economy and Employment	Exmoor is disadvantaged economically as it has no strategic road or rail corridors, which can hinder wider economic opportunities (although this can benefit tourism as people visit to enjoy the peace and tranquillity). Traffic and congestion including demand for parking during peak holiday periods can be bad for business. However, the policy approach is to prioritise community needs over business or tourism. The principle is to provide the minimum parking required taking into account environmental constraints, although bicycle, motorcycle and disabled parking provision are all encouraged	None proposed. The policy approach is addressing other sustainability objectives and alternative solutions will be encouraged on a case by case basis to address localised problems such as parking demand during peak holiday periods along with alternative, more sustainable means of travel

3.5 Cumulative effects

- 3.5.1 As well as identifying individual effects of the draft Local Plan against the SA Objectives an important part of the SA process is to assess how individual effects interact with one another to identify whether there are any cumulative effects that may result from implementation of different policies in the Plan.
- 3.5.2 In combination the effects of the policies and spatial strategy (GP4) are likely to result in a beneficial effect on the protection of the landscape, wildlife, cultural heritage and land. The cumulative impact of development could erode the character of on the landscape and historic environment but policies in the draft Plan will ensure that a robust approach is taken to their protection, and that enhancement is achieved where possible. The Landscape Sensitivity Study has also ensured that there is some capacity for development in all the settlements identified in the spatial strategy. The focus on re-use of existing buildings and the provision of affordable (rather than open market) housing will also reduce land-take.
- 3.5.3 Policies on Tourism and Recreation, Green Infrastructure, Access to Community Facilities and Open Space are likely to work in conjunction with each other to produce a cumulative beneficial effect on the provision and access to public open space, and will also encourage healthy lifestyles and community wellbeing. There may be cumulative impacts arising from more intensive recreation and tourism use or larger scale developments. For example large scale proposals could generate significant levels of traffic, which potentially would lead to increased greenhouse gas emissions. However, the policy guards against cumulative impacts and requires that the location, scale and intensity of use is appropriate in relation to environmental capacity.
- 3.5.4 It is anticipated that there will not be any significant cumulative effects on air quality / water resources, carbon emissions, the coast, or transport.

3.6 What alternatives were considered to the draft Local Plan?

- 3.6.1 The SEA Directive requires assessment of the likely significant effects of implementing the plan, and “reasonable alternatives”. Developing options / alternatives is an important part of both the plan-making and sustainability appraisal process. For the Local Plan, different options were put forward during the preparation of the plan. This included options for how affordable housing could be delivered, and options for where new development should go. These options were appraised and subject to consultation.
- 3.6.2 The preferred option that has been taken forward in the draft Local Plan was to allow new development in all settlements listed in the existing Local Plan plus a number of additional settlements identified through consultation. This was shown to be the most positive option in relation to community wellbeing, the economy and the overall provision of affordable housing, although there could be impacts on landscape due to the sensitivity of some settlements to change, and climate change mitigation and transport due to the dispersed settlement pattern and potential additional travel movements. These potential negative impacts have been examined in more detail in relation to the settlement strategy and, although no specific site allocations or housing targets have been set, any proposals that do come forward will have to ensure negative impacts are avoided or mitigated, in accordance with policies in the Plan.
- 3.6.3 The option that has been taken forward for the delivery of housing is to focus on the provision of affordable housing, but in some circumstances to allow open market housing to cross-subsidise this. There is also allowance for specialist housing to address an identified local need to care for older people and other vulnerable members of the community. There will be both positive and negative impacts of this approach to housing provision in sustainability terms. The focus on providing affordable housing will be positive for local communities and also local businesses who need local workers. The use of open market housing to cross-subsidise this is a pragmatic approach given reductions in public funding for affordable housing, but it could lead to the limited stock of suitable land being used up more quickly. There is no provision for housing solely to meet open market demand as this is likely to have substantial negative impacts due to the levels of likely demand and landscape sensitivity of the National Park.
- 3.6.4 The options considered for each policy area were assessed as part of the Your Future Exmoor issues and options consultation, to give an indication of which options are more favourable in sustainability terms. The SA has been an iterative process, with the policies being assessed as they were drafted and recommendations made to improve their sustainability. Changes made as a result of the SA are recorded in the full Sustainability Report.

4. MONITORING

- 4.1 Ongoing monitoring will be important to ensure that implementation of the Plan does not cause any unforeseen sustainability impacts, and to enable any actual impacts to be identified and addressed. The indicators that will be used to monitor the impact of the Plan are set out in the SA framework (see Appendix 1).

5. NEXT STEPS AND CONSULTATION

- 5.1 The Sustainability Appraisal report will be the subject of informal public consultation alongside the draft Local Plan. The full SA report, along with the other consultation documents are available on the Exmoor National Park website at www.exmoor-nationalpark.gov.uk and from the National Park offices.

Appendix 1 - Sustainability Objectives, Criteria and Indicators

The sustainability objectives, criteria and indicators were developed as part of the Sustainability Appraisal Scoping Report drawing on best practice of other sustainability appraisals, and using the evidence as set out in the Scoping Report, but particularly drawing on:

- The South West Sustainability Shaper checklist;
- Exmoor National Park Management Plan Objectives;
- Indicators and evidence already used in the Annual Monitoring Report; and
- Consultation with internal Officers within the National Park Authority.

Topic	Objectives	Criteria – will the proposals in the Plan....	Indicators
Air Quality and Water Resources	<p>1. To minimise air pollution (including green house gas emissions) and water pollution and ensure air and water quality is maintained or improved.</p> <p><i>Explanation: This objective seeks to minimise pollution from development.</i></p>	<ul style="list-style-type: none"> ➤ Maintain or improve air and water quality? ➤ Minimise emissions from residential and commercial sources? ➤ Reduce emissions from transportation sources? 	<ul style="list-style-type: none"> • Air quality Monitoring data – Environmental Health (WSC & NDC) • Domestic per capita CO2 (tonnes). • % of river length reaching grade A/B (Very good/good) quality for chemical and biological assessment.
Biodiversity and Green Infrastructure	<p>2. To conserve and enhance biodiversity and to protect, conserve and enhance all habitats and species.</p> <p><i>Explanation: These objectives seek to conserve and enhance Exmoor's biodiversity, habitats and species so that any negative impacts from development are avoided or mitigated when meeting the needs of communities and visitors.</i></p>	<ul style="list-style-type: none"> ➤ Conserve and enhance the diversity of species? ➤ Conserve and enhance the diversity of habitats? ➤ Make provision for protected and important species and habitats where appropriate? ➤ Have no adverse impact on SACs or SSSIs? ➤ Enhance local biodiversity and the natural environment? 	<ul style="list-style-type: none"> • Area of new BAP habitat created or restored. • Number of SACs and SSSIs in favourable or unfavourable recovering condition. • Proportion of Local Wildlife Sites where positive conservation management has been or is being implemented (NI197). • Number of applications with provision for protected/important species. • Number of applications with provision for protected/important habitats. • Number of applications where a wildlife survey has been submitted.

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Topic	Objectives	Criteria – will the proposals in the Plan....	Indicators
<p>Climate Change and Adaptation to Flood Risk</p>	<p>3. To minimise and manage the risk of all forms of flooding.</p> <p>4. To minimise the impacts of climate change on Exmoor’s communities and habitats.</p> <p><i>Explanation: These objectives seeks to manage and minimise the impacts of climate change and flood risk and help communities and habitats to adapt as appropriate.</i></p>	<ul style="list-style-type: none"> ➤ Put properties at risk of flooding? ➤ Provide development in the flood plain? ➤ Provide development in areas vulnerable to coastal change? ➤ Put communities and habitats vulnerable to the effects of climate change at risk? 	<ul style="list-style-type: none"> • Number of planning permissions granted contrary to Environment Agency advice on flood defence grounds. • Number of permissions which make a positive contribution to sustainable flood management. (include SUDS proposals) • Number of planning permissions in areas vulnerable to coastal change. • Number of planning permissions for structures and measures to adapt to the impacts of climate change e.g. coastal defences.
<p>Climate Change Mitigation and Energy</p>	<p>5. To minimise the net emissions of carbon dioxide and other greenhouse gases into the atmosphere and to minimise Exmoor’s contribution to global climate change.</p> <p><i>Explanation: This objective seeks to minimise greenhouse gas emissions, promote sustainable living, implement sustainable building practices and install renewable technology that is appropriate to the National Park’s statutory purposes to conserve and enhance the natural beauty, wildlife and cultural heritage of the area and to promote opportunities for the understanding and enjoyment of its special qualities by the public, whilst aiming to achieve the target of becoming a carbon neutral National Park by 2025.</i></p>	<ul style="list-style-type: none"> ➤ Ensure development incorporates energy sustainability measures? ➤ Maximise Exmoor’s potential for renewable energy generation? ➤ Improve the sustainability of Exmoor’s communities? ➤ Encourage the use of sustainable building design and methods? ➤ Encourage travel by sustainable means of transport? 	<ul style="list-style-type: none"> • Domestic per capita CO2 (tonnes) – measure every 5 years. • Number of planning permissions for renewable technologies and other energy sustainability measures. • Housing development that incorporates energy and sustainability measures (above building regulation requirements).

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Topic	Objectives	Criteria – will the proposals in the Plan....	Indicators
<p>Community and Wellbeing (including equalities and health)</p>	<p>6. To promote and support thriving and inclusive communities, health and wellbeing.</p> <p>Explanation: <i>this objective focuses on securing balanced, inclusive communities where people can live healthy lives, have equality of access to community, education and health services and facilities, and have access to and enjoy cultural and recreational opportunities.</i></p>	<ul style="list-style-type: none"> ➤ Provide for community services? ➤ Encourage healthy lifestyles? ➤ Improve access to the Park and to its opportunities and facilities for all? ➤ Create new access opportunities where appropriate? ➤ Help to implement the installation of infrastructure for broadband and mobile technology that is sympathetic to the National Park setting? ➤ Affect specific sub groups disproportionately compared with the whole population? ➤ Cause changes in contacts with health and/or care services, quality of life, disability or death rates? ➤ Likely to cause public or community concerns about potential health impacts of this policy change? ➤ Create safe and attractive public spaces? ➤ Promote local multi service centres? ➤ Improve opportunities for community participation? ➤ Improve access to recreational space, leisure activities, learning and cultural opportunities? 	<ul style="list-style-type: none"> ● Amount of open access land available under the CROW Act 2000. ● Index of multiple deprivation and measures of health deprivation. ● Number of cultural, leisure and sporting facilities available. ● Number of village shops and village post offices available. ● Creation and loss of community services and facilities. ● Number of planning permissions providing disabled access.

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Topic	Objectives	Criteria – will the proposals in the Plan....	Indicators
<p>Economy and Employment</p>	<p>7. To promote and support appropriate, sustainable economic growth, particularly of the key business sectors of tourism, agriculture and other land based industries and small businesses.</p> <p>Explanation: <i>This objective seeks to support and enhance the key sectors of the Exmoor economy and at the same time support the growth of small businesses. Economic development will be appropriate to the National Park setting and where possible will benefit from and help to promote the National Park’s special qualities.</i></p>	<ul style="list-style-type: none"> ➤ Promote and support a sustainable tourism sector? ➤ Promote and support a sustainable agricultural sector and other land based industries? ➤ Promote and support small businesses? ➤ Encourage use of local products and services? ➤ Help to implement the installation of infrastructure for broadband and mobile technology that is sympathetic to the National Park setting? ➤ Work with local employers to support/promote flexible / home working and ICT innovations? ➤ Support local businesses and suppliers? 	<ul style="list-style-type: none"> • Number of registered farm holdings. • % occupancy of beds in holiday accommodation throughout the year. • Tourist spending. • Occupancy rates for serviced and non-serviced accommodation. • % of tourism businesses participating in green/sustainable initiatives or schemes. • Number of applications permitted to create serviced/non-serviced accommodation. • Loss of serviced/non-serviced accommodation. • Number of applications permitted for: camp sites, camping barns, certificated caravan sites. • Number of applications/floorspace (<i>or monitor completed development</i>) for business development (B1, B2 & B8). Could also include separate indicators for A class uses and C1. • Number of planning applications for change of use from business to other use. • Number of live/work/home-working spaces permitted. • Number and area of agricultural buildings permitted. • Number and proportion of agricultural buildings refused. • Number of farm diversification proposals permitted for: <ul style="list-style-type: none"> • Conversion of traditional farm building • Conversion of modern farm building • New building • Number of applications permitted for development for game-bird shooting. • Number of applications approved for equestrian development.

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Topic	Objectives	Criteria – will the proposals in the Plan....	Indicators
Historic Environment	<p>8. To maintain and enhance the quality of the built environment.</p> <p>Explanation: <i>This objective seeks to maintain and enhance the built and historic environment of Exmoor through allowing sympathetic and sustainable design and alteration of new and existing buildings.</i></p>	<ul style="list-style-type: none"> ➤ Conserve the character of historic landscapes? ➤ Conserve the character of settlements and buildings? ➤ Protect and enhance ancient monuments and other heritage assets? ➤ Recognise the potential of the historic environment to contribute to social and economic progress. ➤ Improve access and understanding of local heritage. ➤ Promote a standard of quality in new building design? ➤ Encourage use of local and traditional and sustainable buildings products and materials? ➤ Enhance the distinctiveness and diversity of the local built environment and community spaces? 	<ul style="list-style-type: none"> • Use of local and/or traditional buildings materials in new developments or conversions and extensions. • Number of conservation area enhancement projects. • Number of archaeological projects (i.e. restoration). • Number of listed buildings: on the at risk register; subject to unauthorised alterations; subject to demolition; and successful enforcement action. • Number of listed building consents refused.
Housing	<p>9. To help ensure that National Park-communities have access to appropriate, good quality, sustainable, affordable housing.</p> <p>Explanation: <i>This objective seeks to provide housing to maintain balanced living and working communities and in doing so provide a sustainable mix of affordability, size and type of housing that is of good design and sustainable materials and provides for the needs of young and older people and those whose work is important to communities.</i></p>	<ul style="list-style-type: none"> ➤ Provide affordable housing? ➤ Provide for the housing needs of older people? ➤ Provides for the housing needs of young people? ➤ Provides for those whose work is important to the conservation of the National Park and viability of communities? ➤ Provides for the needs of agricultural and forestry workers? ➤ Ensures affordable housing remains affordable in perpetuity? ➤ Housing development makes good use of existing land and buildings? ➤ Conserves and enhances the special qualities of the National Park? ➤ Helps development to incorporate energy and sustainability measures? ➤ Provides a better mix of sizes, types and affordability. 	<ul style="list-style-type: none"> • The proportion, tenure and type of affordable dwellings approved and constructed. • Who is the affordable housing for? i.e. a worker, a local connection etc • Mean and median average house prices. • Average house price to average household income ratio. • Average annual increase in house price. • Number of planning permissions for annexe accommodation. • Number of agricultural and forestry dwellings permitted. • Housing development from existing land or buildings (brownfield land). • Housing development that incorporates energy and sustainability measures (above building regulation requirements). • Number of empty and second homes. • Number of households in housing need.

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Topic	Objectives	Criteria – will the proposals in the Plan....	Indicators
<p>Land (including agricultural, brownfield, contaminated land, waste and minerals)</p>	<p>10. To promote sustainable forms of development and sustainable use of natural resources.</p> <p>Explanation: <i>This objective seeks to concentrate and diversify development by optimising the use of previously developed land, infrastructure, under used land and vacant properties.</i></p> <p>11. To reduce all forms of waste production and promote reuse and recycling and minimise the risk of contaminated land.</p> <p>Explanation: <i>Although the National Park is not the waste authority, it will seek to implement policies to reduce the amount of waste generated and to promote sustainable waste management.</i></p>	<ul style="list-style-type: none"> ➤ Promote sustainable mineral extraction? ➤ Promote the reuse of land and buildings? ➤ Protect the best and most versatile land from development? ➤ Contribute to the reduction, reuse and recycling of waste? ➤ Contribute to appropriate waste treatment and disposal? ➤ Minimise the risk of contaminated? ➤ Reduce soil quantity and quality? 	<ul style="list-style-type: none"> • Number of planning permissions built on previously developed land. • Loss of the best and most versatile agricultural land to development (need a GIS layer available on PACS). • Loss of greenfield land to development. • Percentage of waste generated, recycled, composted and sent to landfill. • Number of planning permissions for redevelopment of contaminated sites. • Number and type of mineral applications permitted.
<p>Landscape</p>	<p>12. To protect, maintain and enhance the special qualities of the Exmoor National Park’s landscape character.</p> <p>Explanation <i>This objective aims to ensure that Exmoor retains its wild, remote and tranquil setting to enable the quiet enjoyment of the National Park.</i></p>	<ul style="list-style-type: none"> ➤ Reduce or mitigate the adverse effects of agricultural change on the landscape? ➤ Ensure development is sited and designed with landscape in mind? ➤ Reduce the impact of large structures and development that can be seen from the National Park? ➤ Reduce the impact of recreational activities on the landscape? ➤ Contribute to the wild, remote and tranquil setting of Exmoor? 	<ul style="list-style-type: none"> • Number of planning permissions (outside the National Park boundary) that enable large structures and development to be visible from the National Park boundary. • Agri-environment scheme uptakes. • Percentage change in farming businesses. • Loss or damage to key landscape features (woodlands, walls, hedges and hedgebanks) • Change in Countryside Quality based on Countryside Quality Counts data used to inform condition of Countryside Character Areas. • Number of lighting conditions attached to planning permissions.

**Non-Technical Summary Sustainability Appraisal
Draft Exmoor National Park Local Plan**

Topic	Objectives	Criteria – will the proposals in the Plan....	Indicators
Coast	<p>13. To protect and/or enhance coastal areas.</p> <p>Explanation <i>This objective aims to protect and/or enhance coastal areas and minimise the effects of coastal change on communities, the cultural heritage and habitats at risk from the effects of climate change. In some circumstances the coast cannot be feasibly protected in the long term and adaptation measures which enhance the coastal area will be necessary.</i></p>	<ul style="list-style-type: none"> ➤ Put coastal communities and habitats at risk of the effects of coastal change? ➤ Minimise the impact of sea level rises? ➤ Direct development away from vulnerable coastal areas? ➤ Consider the implications sea level rise may have on historic and cultural assets? 	<ul style="list-style-type: none"> • Number of planning permissions in areas vulnerable to coastal change • Number of planning permissions for coastal structures and measures to adapt to the impacts of climate change e.g. coastal defences. • Number of planning permissions for temporary business development in areas vulnerable to coastal change.
Transport	<p>14. Encourage travel by sustainable means of transport and provide access to services, whilst recognising the need to travel by private modes of transport in a dispersed rural area such as Exmoor.</p> <p>Explanation: <i>This objective, although aspirational in seeking to reduce travel by means of the private car, recognises that Exmoor is a dispersed rural area where currently there is a need to travel by private modes of transport in order to access services and facilities.</i></p>	<ul style="list-style-type: none"> ➤ Help to ease traffic congestion in the tourism season and provide more sustainable ways of accessing the National Park? ➤ Safeguard public rights of way? ➤ Improve opportunities for safe horse-riding, cycling and walking as an alternative to car travel? ➤ Reduce the need to travel, especially by private car? ➤ Improve access to online and mobile services to reduce travel by car? ➤ Support demand responsive, low-carbon public transport for the local community? ➤ Support improved (and low carbon) access to essential goods and services? 	<ul style="list-style-type: none"> • Average daily traffic movements. • Public transport routes. • Percentage of public rights of way 'easy to use' (BVPI 178). • Length of public right of way adversely affected by development.

SA topics	Air quality and water resources	Biodiversity and Green Infrastructure	Climate change & adaptation to flood risk	Climate change mitigation and energy	Community wellbeing	Economy and employment	Historic environment	Housing	Land	Landscape	Coast	Transport
GP1	++	++	++	+	++	++	++	+	+	++	+	++
GP2	+	++	++	+	+	+/-	++	+/-	++	++	+	+
GP4	+/-	+/-	+/-	+/-	++	++	+/*	++	+	+	+	+/-
GP5												
GP6	0 *	++	0	+	+	+	++	+	0 *	++	0	0 *
CE-S1	0	++	+	+/-	+	+	++	+/-	+/-	++	+	+/-
CE-D1	0	++	0	+	+	+	+	+	0	++	+	+
CE-S2	+	++	++	+/-	+	+/-	0	+/-	-	+/-	+	-
CE-S3	+	++	++	+	+	+	+	+	0	++	+	+
CE-S4	0	0	++	+/-	+	+	++	+/-	+	++	++	-
CE-S5	+	+	0	+	0	+	++	0	+	+	0	0
CE-S6	+	+	+	++	++	+	++	+	+	++	+	+/-
CE-D5	0	0	0	0	+	+	++	0	0	++	0	+
CE-S7	+	+	+	+	+	+	+	0	+	+	0	+
CE-S8	- **	- **	+	+	+	0	+	0	+	+	0	+
CC-S1	+	+	++	++	+	+	+	+	+	+	+	+
CC-D1	+	+	++	+	++	+/-	0	+/-	+/-	+	++	0
CC-D2	+	+	++	0	+	+/-	+	+	+	+	++	+
CC-D3	++	++	++	0	+	+	+	+	+	0	0	0
CC-S3	++	++	0	+	+/-	+/-	++	+	+	++	0	+
CC-D4	+	+	0	+/-	+/-	+/-	+	+	0	++	+	+
CC-D5	+	+	0	+/-	+/-	+/-	+	+	0	++	+	0
CC-S4	+	+	0	+	+	+	0 *	0	++	+	0	+
CC-D6	+	0 *	+	0	+	0	0	- *	+	+	+	0
CC-S5	++	+	+	+	++	+/-	0	0	++	+	0 *	+
HC-S1 HC-S2 HC-S3 HC-S4	+	+	0	0	++	+/-	++	++	+	+	0	+
HC-D1	+	0	0	+	+	+	+	++	+	+	+	+
HC-D4 HC-D5 HC-D6	0	0	0	+	+	+	0	+	+	+	0	0
HC-D3	0	+	- *	+/-	++	+	- *	++	+/-	+	0	+/-
HC-D12 HC-D13 HC-D14	0	0	0	+	+	0	+	+	+	+	0	+
HC-S6	- =	0	- =	0	+	+	0	+	+	+	0	0
HC-S7 HC-D16	+	+	0	+	++	++	+	0	+	+	0	+
HC-D19	0	+	0	0	+	+/-	+	-	+	++	0	0
SE-S1	0	+	0 *	+	+	+	+	+	+	++	0	+
SE-D1	0	+	0	+	+	+	+	0	+	+	0	+
SE-D2	+	+	0	0 *	+	+	+	0	+	+	0	+
SE-D3	+	0 *	0	+	++	++	0 *	0	+	+	0	+
SE-D4	0	0	0	+	+	++	0	+	+	0	0	0
SE-S2	+	+	0 *	0 *	+	+	+	0	+	++	0	0 *
RT-S1	+	+	0	+	+	+/-	+	0	+	+	+	+
RT-D1 RT-D2	0	0	0	+/-	+	+/-	+	+	+	+	0	+/-
RT-D5 RT-D6	+	+	+	+	0	+/-	+	0	+	++	0	+
RT-D9	+	0 *	0 *	+	0	+	+	0	0	+	0	+
RT-D10	+	+	0	+/-	+	+/*	+	0	+	+	0	+
RT-D11	+	+	0	+	+	+	+	0	+	++	0	+
RT-D12	+	+	0	+/-	+	+	+	0	+	+	0	+/-
RT-D13	+/-	+	0 *	+/-	+	+	++	0	+	+	0	+/-
AC-S1	+	0 *	+	++	+	+	0	+	0	0	+	++
AC-S2 AC-D1	+	+	0	+	+	+/-	++	+	+	++	0 *	++
AC-S3 AC-D2	+	0 *	0	+	+	-	+	+	+	+	0 *	++

AC-S4 AC D4 AC-D5 AC-D6	+/-	+	0	*	+	++	++	+	**	0	+	++	+	+/-
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	Air quality & water resources	Biodiversity & Green Infrastructure	Climate Change & Adaptation to Flood Risk	Climate Change Mitigation and Energy	Community Wellbeing	Economy and Employment	Historic Environment	Housing	Land	Landscape	Coast	Transport
Dulverton	+/-	+/-	+/-	+	++	++	+/-	++	+/-	+/-	0	+
Dunster	+/-	+	+	+/-	++	++	+/-	+/-	+	+/-	0	+/-
Lynnton & Lymnouth	+	+/-	+/-	+/-	++	++	+/-	++	+/-	+/-	+	+/-
Porlock	+/-	+/-	+/-	+/-	++	++	+/-	++	+/-	+/-	0	+/-
Allerford	0	+/-	-	0	+	+/-	+/-	+	+	+/-	0	+
Barbrook	+	0	+/-	+/-	+	+	0	+	+/-	+	0	+/-
Brendon	0	+/-	+/-	0	+	+	0	++	+/-	+	0	-
Bridgetown & Exton	0	0	+/-	0	+	+	0	++	+/-	+	0	+/-
Brompton Regis	+/-	0	+	0	+	+	+	++	+/-	+	0	+/-
Challacombe	0	+/-	+/-	0	+	+	0	+/-	+	+/-	0	-
Cutcombe & Wheddon Cross	0	+	0	0	++	++	0	++	+/-	+	0	+/-
Exford	0	0	+/-	0	+	+	0	++	+/-	+	0	+/-
Luxborough	0	+/-	+/-	0	+	+	0	+	+	+/-	0	+
Monksilver	0	0	+/-	0	+	+	0	+	+	+/-	0	+/-
Parracombe	0	0	+/-	0	+	+	+/-	++	+/-	+	0	+
Roadwater	0	0	+/-	0	+	+	0	++	+/-	+	0	+/-
Simonsbath	+/-	+/-	0	0	+	+	+/-	+	+	+/-	0	+
Timberscombe	0	0	-	0	+	+	0	++	+/-	+	0	+
Winsford	0	0	+/-	0	+	+	0	+	+	+/-	0	+
Withypool	+	+/-	+/-	0	+	+	0	+	+	+/-	0	+
Wooton Courtney	0	0	+/-	0	+	+	+/-	++	+/-	+	0	+
Countisbury	0	+	0	0	+	+/-	0	+	++	+/-	0	+
Hawkridge	0	0	0	0	+	+/-	0	+	++	+	0	-
Heasley Mill	0	0	+/-	0	+	+/-	0	+	++	+	0	-
Kentisbury	0	0	0	0	+	+/-	0	+	++	+	0	-
Luccombe	0	+/-	0	0	+	+/-	+/-	+	++	+/-	0	+/-
Martinhoe	0	0	0	0	+	+/-	0	+	++	+	0	-
Oare / Malmsead	0	+/-	+/-	0	+	+/-	0	+	++	+	0	-
Porlock Weir	0	+/-	+	0	+	+/-	+/-	+	+/-	+/-	+	+
Selworthy	0	+/-	0	0	+	+/-	+/-	+	++	+/-	0	+
Twitchen	0	+/-	+/-	0	+	+/-	0	+	++	+	0	-
West Porlock	0	+/-	0	0	+	+/-	0	+	++	+	0	+
Withycombe	0	0	0	0	+	+/-	0	+	++	+	0	+

Habitats Regulations Assessment Comments on draft Policy Larry Burrows Ecologist – Strategic Planning Somerset County Council Comments which would fall outside the HRA in [square brackets] Document adapted for Planning Committee by Jo Symons	
Draft Policy	Comment
<u>POLICY GP3: MAJOR DEVELOPMENT</u>	
<ol style="list-style-type: none"> 1. In securing National Park purposes, in responding to the National Park’s duty to foster the social and economic wellbeing of its communities and in accordance with government guidance major development will not take place within Exmoor National Park except in exceptional circumstances following the most rigorous examination and where they can demonstrate that they are in the public interest and raise issues of national significance. Where exceptionally a proposal for major development is of national significance and needs to be located in the National Park then every effort to mitigate potential localised harm and compensate for any residual harm to the area would be expected to be secured. 2. Proposals for major development will need to demonstrate to the satisfaction of the National Park Authority: <ol style="list-style-type: none"> a) 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 and local communities; b) the cost of, and scope for, developing elsewhere outside the National Park, or meeting the need for it in some other way; c) any detrimental effect on the environment, the landscape, the National Park’s special qualities and recreational opportunities, and the extent to which that could be moderated; d) the cumulative impact of the development when viewed with other proposals and types of development; e) the scope for adequate restoration of the land once the use has ceased. 	<p>Potential significant effect. Under c ‘moderated’ would be unacceptable for effects on Natura 2000 (and populations of European protected species) and the applicant would need to show how effects are eliminated through mitigation or offsetting. I would recommend a separate statement on nature conservation such as:</p> <p>‘there are no detrimental effects on Natura 2000 sites, [or populations of European protected species], including how this is achieved through mitigation, including by biodiversity offsetting.’</p>
Draft Policy	Comment
<u>CE-S5 PRINCIPLES FOR THE CONVERSION OR STRUCTURAL ALTERATION OF TRADITIONAL BUILDINGS.</u>	
<ol style="list-style-type: none"> 1. The conversion or structural alteration of traditional buildings will be permitted where the proposal: <ol style="list-style-type: none"> a) clearly demonstrates that the building is capable of conversion without substantial reconstruction; b) is suitable for the existing building in terms of the intended use and the intensity of that use, in relation to its capacity, structure and character without substantial alteration; 	<p>No significant effect likely. [However, would suggest a further criteria under 1: Maintains or replaces bat and barn owl roosts]</p>

<ul style="list-style-type: none"> c) accords with the relevant policies in this plan in terms of the intended use; d) ensures the historic fabric, and architectural interest of the building and its setting including the retention of existing traditional and historic features are conserved and enhanced (where the building is identified as a heritage asset on the Exmoor National Park Historic Environment Record proposals should be consistent with policies CE-S4 and CE-D3); and e) reflects the character and significance of the building and conserves its traditional appearance through sensitive design and the use of traditional materials, detailing and construction principles. <ol style="list-style-type: none"> 2. Conditions will be attached to remove permitted development rights granted by the General Permitted Development Order 1995 to ensure the character and appearance of traditional buildings are conserved. 3. New extensions to traditional buildings will only be permitted where they accord with the relevant policy in terms of the intended use and CE-S7 Design & Sustainable Construction principles. 4. The conversion of isolated traditional buildings that are not part of a building group, such as a farmstead or hamlet will only be permitted where it accords with the tests in this policy and the provisions set out in Policy RT-D6 for change of use to camping barns. 	
<p>Draft Policy</p>	<p>Comment</p>
<p><u>CE-S6 PRINCIPLES FOR THE CONVERSION AND STRUCTURAL ALTERATION OF NON-TRADITIONAL BUILDINGS</u></p> <ol style="list-style-type: none"> 1. The conversion or structural alteration of non-traditional buildings will be permitted in accordance with relevant policies in the Plan if traditional buildings are considered by the National Park Authority to be incompatible with the intended purpose or no such buildings are present. 2. Proposals should demonstrate that: <ul style="list-style-type: none"> a) the building is of permanent and substantial construction and capable of conversion without significant reconstruction and alteration; b) the building is suitable for the proposed use including the proposed intensity of use in terms of its capacity, and structure; c) landscape character (CE-S1), wildlife interests (CE-S2), and cultural heritage (CE-S4) are conserved or enhanced through measures to provide environmental and visual enhancement; and d) the building incorporates design and sustainable construction principles consistent with policy CE-S7. 3. New extensions should accord with the relevant policy requirements in terms of the intended use and CE-S7 Design & Sustainable Construction Principles. 	<p>No significant effect likely.</p> <p>[However, would suggest adding to list in C after '<i>wildlife interests</i>'... including maintenance or replacement of any bat roosts that may be present, ...']</p>

Draft Policy	Comment
<p><u>CE-S8 SMALL SCALE WORKING OR RE-WORKING FOR BUILDING AND ROOFING STONE</u></p> <ol style="list-style-type: none"> 1. Proposals for small scale quarries or the reworking of existing small quarries to provide building or roofing stone, including for the repair of heritage assets, will be permitted where it can be clearly demonstrated that they will contribute to meeting National Park purposes and where: <ol style="list-style-type: none"> a) there is a demonstrable need within the National Park and any minerals won will be for the sole use of the locality within the National Park; b) proposals would help to provide local employment and reduce 'stone' miles; c) there is suitable access and it is of a scale and design appropriate for its location in the National Park; d) it would not adversely affect the landscape character, wildlife, cultural heritage, geodiversity, special qualities, tranquillity, health or amenity of the National Park; e) there are no suitable sources of previously used materials that are reasonably available; f) the local building material cannot be sourced sustainably from elsewhere, including from outside the National Park, and the loss of supply would result in the devaluing of the built fabric of the National Park; g) permitted operations do not have unacceptable adverse impacts on the natural and historic environment or human health, including from noise, dust, visual intrusion, traffic, tip and quarry-slope stability, differential settlement of quarry backfill, mining subsidence, increased flood risk, impacts on the flow and quantity of surface and groundwater and migration of contamination from the site; and take into account any cumulative effects of multiple impacts of individual sites; h) recognise that some noisy short-term activities, which may otherwise be regarded as unacceptable, are unavoidable to facilitate minerals extraction. But ensure that any unavoidable noise, dust and particle emissions and any blasting vibrations are controlled, mitigated or removed at source, and establish appropriate noise limits for extraction in proximity to noise sensitive properties; i) any waste materials from extraction will be re-used or recycled. The details of which must be included with the planning application; and j) a scheme for restoration and after-use of the site carried out to high environmental standards, through the application of appropriate conditions where necessary, based upon conservation and enhancement of geodiversity and biodiversity, the historic environment and quiet enjoyment, will form an integral part of the proposal and will be sought at the earliest opportunity. 2. Conditions may be applied to limit the annual extraction rate. 3. Development which would compromise the future extraction of important building stone at existing or former quarries will not be permitted. 4. Planning permission will be granted, subject to this policy and other policies within this Plan, for non-mineral development within Minerals Safeguarding Areas where: 	<p>Potential significant effect may be possible as the policy is not location specific and therefore there are potential noise impacts on nearby bat roosts and otter holts (Exmoor and Quantocks Oak Woodlands SAC).</p> <p>I would recommend under 1.h) to add at end:</p> <p>'... and wildlife.'</p>

<p>a) the mineral can be extracted satisfactorily prior to the development taking place; or</p> <p>b) the development is of a temporary nature, can be completed and the site restored to a condition that does not inhibit extraction within the timescale that the mineral is likely to be needed; or</p> <p>there is an overriding need for the development.</p>	
<p>Draft Policy</p>	<p>Comment</p>
<p><u>CE-S9 MAJOR MINERAL EXTRACTION</u></p> <ol style="list-style-type: none"> 1. In accordance with national policy, proposals for large scale mineral extraction will not be permitted in the National Park unless in exceptional circumstances. Such proposals will be considered against the major development tests set out in policy GP3: Major Development, and should be demonstrated to be in the public interest before being allowed to proceed. 2. Where planning permission is granted for major mineral development, the development and all restoration should be carried out to high environmental standards, be in character with the local landscape and its natural features, and be subject to the following criteria: <ol style="list-style-type: none"> a) recognise that some noisy short-term activities, which may otherwise be regarded as unacceptable, are unavoidable to facilitate minerals extraction. But ensure that any unavoidable noise, dust and particle emissions and any blasting vibrations are controlled, mitigated or removed at source, and establish appropriate noise limits for extraction in proximity to noise sensitive properties; b) any waste materials from extraction will be re-used or recycled. The details of which must be included with the planning application; and c) a scheme for restoration and after-use of the site carried out to high environmental standards, through the application of appropriate conditions where necessary, based upon conservation and enhancement of geodiversity and biodiversity, the historic environment and quiet enjoyment. This will form an integral part of the proposal and will be sought at the earliest opportunity. <p>These matters will be subject to a planning obligation.</p>	<p>No significant effect likely but would suggest inserting after ‘... <i>high environmental standards...</i>’ in 1.j)</p> <p>‘... there are no residual impacts on Natura 2000 sites or on maintaining populations of European protected species, ...’</p>
<p>Draft Policy</p>	<p>Comment</p>
<p><u>HC-S8 RESIDENTIAL INSTITUTIONS</u></p> <ol style="list-style-type: none"> 1. Proposals for new residential institutions will be supported where they meet all of the following principles and accord with other policies in this plan: <ol style="list-style-type: none"> a) They re-use existing buildings, including hotel and guesthouse premises (RT-D3 clause 1), without the need for significant extension and accord with policies relating to the conversion or structural alteration of buildings (CE-S5 and CE-S6). b) The design and layout of access and parking requirements are compatible with landscape character and built heritage (AC-S3). c) Traffic generation can be accommodated by the local road network without adversely affecting road safety and capacity. 	<p>No significant effect likely</p> <p>[However, would suggest adding to the last paragraph: ‘... the maintenance or replacement of any bat and barn owl roosts that may be present, ...’]</p>

<p>d) The use does not compromise local amenity or result in an unacceptable impact on the character of the area (CE-S1, CE-S4).</p> <p>2. Regard should be had to location and the level of services and facilities that may be required to support the proposed use. If the National Park Authority considers that the proposal would have significant transport implications a Transport Assessment or Statement will be required (AC-D1).</p> <p>3. Proposals which encourage the understanding and enjoyment of the National Park and its special qualities (RT-S1) will be favourably considered where they also accord with policies in this Plan.</p> <p>4. Extensions to existing residential institutions will be permitted where it can be demonstrated that they will not harm the character of the building and in accordance with the design principles set out in policy CE-S7.</p>	
<p>Draft Policy</p>	<p>Comment</p>
<p><u>POLICY HC-S6 TRAVELLING COMMUNITIES</u></p> <p>1. To ensure that the travelling communities' traditional and nomadic way of life is recognised, where an identified need for caravans or mobile homes for travelling communities can be demonstrated, the NPA will work with the relevant housing authorities to appropriately address that need. Exceptionally, small sites may be permitted where:</p> <ul style="list-style-type: none"> a) there is a proven local need for a site to accommodate the affordable need of travelling communities who have a proven local connection through employment, longstanding residency or family, in the parish or adjoining parish; b) there are no suitable sites that can meet the need outside the National Park boundary; and c) the site will respect the principles of sustainable development, be located in a settlement in accordance with GP4, well related to existing buildings and conserve or enhance the settlement character and pattern, be accessible to appropriate health and educational facilities and not result in undue pressure on local infrastructure and services , d) the need can be met without an adverse impact on the landscape and the application is accompanied by a landscaping scheme that secures effective screening of the caravans or mobile homes; e) the interests of the settled community will be respected; f) the site will be affordable to local travelling communities and will remain so in perpetuity; <p>A planning obligation is secured to ensure that occupancy of the site is confined to persons in local need of accommodation in perpetuity</p>	<p>'No significant effect likely</p> <p>[However, would suggest adding 'and wildlife' after 'landscape' in item d.]</p>

Draft Policy	Comment
<p><u>HC-D16 LOCAL COMMERCIAL SERVICE PROVISION</u></p> <p>1. Proposals for new build, extensions or change of use of buildings for local commercial service provision within Local Service Centres and Villages will be permitted where:</p> <ul style="list-style-type: none"> a) the proposed location contributes to the overall vitality of the settlement and the local economy and the proposal cannot be accommodated within sites/buildings which already have planning permission; b) they will not adversely affect the locality or National Park or the amenity of nearby residents as a result of traffic or parking (AC-D1); c) if required by the National Park Authority, an impact assessment has been submitted, the scope of which has been agreed prior to submission; and d) they are in accordance with CE-S7 Design & Sustainable Construction and CE-D4 Advertisements. <p>2. Within Rural Communities only extensions to existing local commercial services or the change of use of buildings for local commercial service provision will be permitted in accordance with 1 a) to d) above.</p> <p>3. Proposals for new local commercial service provision in the open countryside, through the reuse of existing buildings, will only be permitted in accordance with SE-S3 Business Development in the Open Countryside, and where:</p> <ul style="list-style-type: none"> a) they are small scale ancillary retail development/ operations principally offering for sale goods which are produced at the premises; or b) they principally comprise the sale of crafts and goods made on site, or shops and/or cafés which are ancillary to farms, visitor facilities, or camping and caravan sites; and c) they will not have adverse impacts on adjoining land uses; and d) it can be demonstrated that they will not adversely affect service provision in nearby settlements; and <p>they are in accordance with CE-S7 Design & Sustainable Construction and CE-D4 Advertisements.</p>	<p>Potential significant effect is possible as new build may affect habitat use or behaviour of bats outside designated sites. It is recommended that an additional criteria under 1 be included:</p> <p>They comply with Policy CE-S2 on Biodiversity</p>
Draft Policy	Comment
<p><u>POLICY SE-S3 BUSINESS DEVELOPMENT IN THE OPEN COUNTRYSIDE</u></p> <p>1. Proposals for business development outside the Local Service Centres and Villages named in Policy GP4 will only be permitted where the scale and appearance of the development are acceptable, they relate to the reuse of existing buildings and accord with SE-S1 and the following criteria:</p> <ul style="list-style-type: none"> a) the proposal is well related to an existing group of buildings where there is an existing dwelling for: 	<p>Possibly no significant effect likely</p> <p>However, what is an 'acceptable impact' on wildlife? This is not defined.</p>

- i) the small scale extension of an existing site or building in business use where they are consistent with Policy CE-S7. Proposals for extensions and the intensification of current diversified businesses will be in accordance with SE-S1; or
- ii) the change of use/conversion of an existing traditional building in accordance with CE-S5.

2. Proposals will be permitted only where it can be demonstrated that:

- i. they will only generate a level of activity that would have an acceptable impact on the landscape, wildlife or historic environment of the National Park, will not conflict with neighbouring land uses or cause pollution or other unacceptable environmental impacts; and
- ii. satisfactory access and traffic requirements can be achieved consistent with National Park purposes;

3. 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.

4. Additionally, proposals for the diversification of existing agricultural, or other primary businesses responsible for land management, through the re-use/change of use of an existing non-traditional building for business development may be permitted where the following will be achieved:

- a) they comply with the requirements of Clauses 1, and 2. of this Policy, Policy CE-S6 and significant reconstruction or alteration are not required;
- b) it can be demonstrated that the agricultural use of the existing building(s) to be reused is redundant;
- c) the proposed business development supports an existing agricultural or other primary business responsible for land management and the diversification proposal does not conflict with the existing farming or land management activity; and
- d) planning obligations will be used to ensure that ownership and control of the development is retained by the primary land based business by not disposing of the development separately from the main building group to ensure that income will be returned to appropriate management of the landscape.

proposals to change the use of an existing building from agricultural to a business use (use classes B1, B2, B8 or sui generis), a condition may be attached to the permission to enable the building to be used for the purposes of agriculture or the permitted business use.

Draft Policy	Comment
<p><u>SE-D1 HOME BASED BUSINESSES</u></p> <p>1. The use of part of a residential property, a small scale extension, the use of ancillary buildings where they are well related to existing buildings or, where no suitable buildings exist new outbuildings within the domestic curtilage, for a small scale home based business will be permitted where:</p> <ul style="list-style-type: none"> a) there is no unacceptable adverse impact on the landscape or the amenity of the area or on the occupiers of neighbouring properties; and b) Where an extension is proposed the development accords with Policy HC-D13: residential extensions. <p>2. Where necessary, conditions will be attached to any granting of planning permission including to:</p> <ul style="list-style-type: none"> a) control the use to avoid or minimise any potential adverse impacts; b) remove permitted development rights to protect the character and appearance of the building; c) ensure any new development may only be occupied in association with the dwelling and cannot be let or disposed of separately from that dwelling; and d) allow, where appropriate, the business use to cease and revert to an ancillary domestic use without the need for a further planning permission. 	<p>No significant effect likely</p> <p>However, would add 'wildlife' after 'landscape' in bullet 1.a).</p>
Draft Policy	Comment
<p><u>SE-S4 AGRICULTURAL AND FORESTRY DEVELOPMENT</u></p> <p>1. Permission will be granted for new or replacement buildings, tracks and structures or extensions required for agriculture or forestry purposes (including those submitted under the notification procedure) where:</p> <ul style="list-style-type: none"> a) it can be demonstrated there is a functional need for the extension, building, structure or track and its size and scale is commensurate with the demonstrated need; b) the building, track or structure is designed for the purposes of agriculture or forestry; c) in the case of new buildings, the site is related physically and functionally to existing buildings associated with the business unless it can be demonstrated that there are exceptional circumstances relating to agricultural necessity for a more isolated location; d) they do not generate a level of activity or otherwise detrimentally affect: <ul style="list-style-type: none"> i. the amenity of surrounding properties and occupiers including, through loss of daylight, overbearing appearance, or conflict with neighbouring land uses; ii. the enjoyment of the National Park by the public; 	<p>There is a potential significant effect. The term acceptable impact on wildlife infers that some impacts would be permissible whereas effects to European sites are required not to affect the conservation objectives of that site. The policy is not location specific and therefore there is potential for impacts both within and out with designated sites, to features used by mobile species used in their ecological functioning and necessary to maintaining its Favourable Conservation Status. Buildings, structure and tracks could possibly sever or disturb commuting routes for bats or result in</p>

<p>e) appropriate measures are taken to ensure they do not, including through the level of activity, have an adverse impact on the locality, exacerbate flood risk or surface water run-off, (Policy CC-D1) cause pollution (Policy CC-S5) or other unacceptable environmental impacts;</p> <p>f) they are of an appropriate siting, size, scale, massing, layout, external appearance, materials, and design that have an acceptable impact on the landscape character, wildlife and cultural heritage;</p> <p>g) a landscaping scheme which reduces the visual impact of the proposal on the wider landscape to an acceptable level and which reinforces landscape character may be required as part of the proposal. Existing elements such as trees, hedges and stone walls should be retained;</p> <p>h) the development incorporates measures which maintain, promote or restore biodiversity in accordance with Policy CE-S2: Biodiversity;</p> <p>i) it can be demonstrated that opportunities have been taken for:</p> <ul style="list-style-type: none"> i. the integration of passive design and sustainable construction methods to improve energy efficiency, and ii. the integration of appropriate renewable energy technologies to reduce carbon emissions in accordance with CC-S3; <p>j) the development has been future proofed against climate change impacts, including flood risk by incorporating measures such as sustainable drainage systems; and</p> <p>k) waste and resource use are minimised through the reuse of materials and buildings, water efficiency and management of site waste.</p> <p>The National Park Authority will consider attaching a condition to require the removal of agricultural or forestry buildings when they are no longer required and the reinstatement of the land and/or will consider tying the agricultural building(s) to the associated land holding to ensure there is a viable land holding related to the building(s) in the future.</p>	<p>noise impacts affecting otter holts. These impacts are not necessarily obvious. Therefore would recommend an additional clause stating:</p> <p>‘there are no detrimental effects on Natura 2000 sites, [or populations of European protected species], including how this is can be achieved through mitigation.’</p>
<p>Draft Policy</p>	<p>Comment</p>
<p><u>RT-S1 RECREATION AND TOURISM</u></p> <p>1. Opportunities to provide a high quality visitor experience on Exmoor through a diverse range of recreation, tourism and environmental education facilities will be encouraged, where it can be demonstrated that proposals for such development conform to the following principles:</p> <ul style="list-style-type: none"> a) They underpin the quiet enjoyment of the National Park. Proposals that actively enhance the understanding and enjoyment of Exmoor’s special qualities will be favourably considered. b) They do not adversely affect Exmoor’s special qualities, either individually or cumulatively, through harmful levels of activity or use. 	<p>Significant effects are unlikely due to provision of facilities resulting in increased visitor access (see HRA of Partnership Plan 2012 - 2017)</p> <p>There may be localised effects from new built facilities which would be covered by Policy CE-S2.</p>

<p>c) They contribute towards a sustainable future for Exmoor’s local economy and communities.</p> <p>d) They support the improved health and wellbeing of people living, working and visiting Exmoor through the benefits of recreation (RT-D10) and experience of tranquillity.</p> <p>e) They ensure appropriate and safe access by the road network and where possible by walking, cycling, horse-riding and public transport. Development that would generate significant transport movements should be accessible by sustainable travel modes set out in a travel plan (AC-S1, AC-D1).</p> <p>f) They safeguard the existing access network, including public rights of way, and access land; and provide enhancements where opportunities arise (RT-D12).</p> <p>g) They respond to opportunities to improve the quality and viability of existing recreation and tourism businesses, through appropriate restoration, extension, expansion or diversification (CE-S1, CE-S7).</p> <p>h) Their location is consistent with policy GP4 and they are of a scale compatible with their location and setting, in accordance with the relevant development management policy considerations for tourism and recreation (policies RT-D1 to RT-D12).</p> <p>They are consistent with the approach set out in policies RT-D1 to RT-D12 and the principles set out in policies CE-S5 and CE-S6 for the re-use of existing traditional and non- traditional buildings.</p>	<p>However, would recommend insertion of the word ‘including its wildlife’ after ‘<i>Exmoor’s special qualities</i>’ in clause 1.b)</p>
<p>Draft Policy</p>	<p>Comment</p>
<p><u>RT-D1 SERVICED ACCOMMODATION</u></p> <p>1. Proposals for the provision of new serviced accommodation through the appropriate change of use and conversion of existing traditional buildings will be permitted where all of the following are met:</p> <p>a) The traditional character, appearance and setting of the building or building group is conserved or enhanced (CE-S4, CE-D3, CE-S5); and</p> <p>b) The building or building group is capable of conversion to serviced accommodation and any other ancillary requirements without significant alteration or extension (CE-S5); and</p> <p>c) The design layout of access and parking requirements are compatible with landscape character and built heritage (AC-S3); and</p> <p>d) The intensity of use does not compromise local amenity; and</p> <p>e) Traffic generation can be accommodated by the local road network without adversely affecting road safety and capacity.</p> <p>Small scale extensions which are subordinate to existing serviced accommodation will be permitted in accordance with policy CE-S7 to improve the quality or capacity of the accommodation. In relation to proposals that seek a change of use from a residential dwelling (use class C3) to serviced accommodation (use class C1) a condition will be attached to a permission to enable the property to be used either as C1 Hotels or C3 Dwellings.</p>	<p>No significant effect likely</p> <p>[However, would suggest adding a new clause after 1.C): ‘...any bat and barn owl roosts that may be present are maintained or replaced.’]</p>

Draft Policy	Comment
<p><u>RT-D4 NON-SERVICED ACCOMMODATION</u></p> <p>1. Proposals for the change of use and conversion of buildings to non-serviced accommodation will be permitted where they: Create additional unit(s) on an existing self-catering complex.</p> <ul style="list-style-type: none"> a) Are in accordance with RT-D3 Safeguarding Serviced Accommodation clause 2.b). b) Reuse a redundant building associated with a hotel/guesthouse premises. OR c) Relate to the diversification of a rural land-based business. <p>2. Proposals should also meet the following principles:</p> <ul style="list-style-type: none"> a) the character and appearance of the building and its setting is conserved, and where they accord with policies on landscape character, cultural heritage and design (CE-S1, CE-S4, CES5 and CE-S6); b) in respect of changing the use of traditional farm buildings, the entire range of such buildings within a farmstead, will not be permitted to be converted to protect the historic character and significance of the buildings collectively; c) there is adequate access, parking can be accommodated unobtrusively, and the local road network has capacity to service the accommodation without adversely affecting road safety (AC-D1, AC-S3); and d) there are no adverse impacts on tranquillity and local amenity. <p>3. Small scale extensions and alterations will be permitted to improve the quality and viability of existing non-serviced accommodation; where it would not adversely affect the historic character of the existing building (CE-S7). No new build units of holiday-let accommodation will be permitted.</p> <p>Where a non-serviced accommodation unit is no longer needed or viable a proposal to replace the holiday occupancy condition of the unit with an agreement limiting occupancy to meet a local affordable need for housing or housing for extended families will be considered in accordance with policy HC-D11. In respect of changes to business or community use proposals should accord with the relevant policies in the plan.</p>	<p>No significant effect likely</p> <p>[However, would suggest adding a new clause in 2: 'Any bat and barn owl roosts that may be present are maintained or replaced.']</p>
Draft Policy	Comment
<p><u>RT-D6 CAMPING BARNES</u></p> <p>1. Proposals for the change of use and necessary alteration of a traditional building to a camping barn or hostel accommodation will be permitted where it complements the historic character and appearance of the building, biodiversity interests, and its setting within the landscape in accordance with policies CE-S1, CE-S2, CE-S4 and CE-S5.</p> <p>2. Where the existing building is in a farmstead or hamlet in close association with an existing dwelling, or in a named settlement:</p>	<p>No significant effect likely</p> <p>[However, would suggest adding a new clause after 3.c): '...any bat and barn owl roosts that may be present are maintained or replaced.]</p>

<p>a) Parking and access arrangements should be incorporated within the hamlet/farmstead without detrimentally impacting on landscape character and visual amenity; or in a settlement is consistent with policies AC-D1 and AC-S3.</p> <p>b) Utility and service supplies will be routed underground (AC-D5).</p> <p>3. The change of use and conversion of a traditional barn or building in an isolated location to provide basic shelter in a camping barn (stone tent) with limited facilities for walkers, will only be permitted where it can be demonstrated that:</p> <p>a) The building can be managed effectively without new access provision;</p> <p>b) The proposal does not involve alterations to the external fabric and surroundings of the building that would materially affect the character or appearance of the building and its setting; and</p> <p>The building is well related to the rights of way network or access land.</p>	
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<p><u>RT-D9 ALTERNATIVE CAMPING ACCOMMODATION</u></p> <p>1. Small-scale, low impact alternative camping accommodation proposals will be permitted where:</p> <p>a) they are only used for the purposes of holiday accommodation;</p> <p>b) the overall development is small-scale in terms of area and number of units and will not require additional permanent residential accommodation to manage the site;</p> <p>c) the net floor space of each unit is less than 25sqm and will not be connected to a water supply or drainage facility;</p> <p>d) they are of high quality sustainable design and demonstrate that the siting and landscaping strongly relate to the landscape and historic character of the area; and is appropriate to its setting (locations that are well screened by woodland or well-treed settings are preferred and should meet the tests in this policy);</p> <p>e) there are no adverse impacts on sensitive wildlife species and habitats;</p> <p>f) they have low environmental impact through avoidance of site treatments including excessive areas of hard-standing, site levelling, re-profiling, and fencing; and have limited physical connection with the ground;</p> <p>g) the need for additional facilities is clearly demonstrated and commensurate with the level of anticipated need, are provided within an existing building or as a modest extension to existing facilities; and</p> <p>h) where the need for additional parking is demonstrated, provision should reflect the minimum level of need.</p>	<p>Potential significant effect from disturbance if sites are located near otter holts or close to sensitive habitat due to trampling, e.g. woodland mentioned in the policy</p> <p>It is recommended that an item be added to 1:</p> <p><i>‘They are in a location where there are no adverse impacts on sensitive wildlife species and habitats.’</i></p>
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<ul style="list-style-type: none"> i) Small-scale extensions to existing parking areas should be well designed, landscaped and integrated with the site and its setting. ii) New parking provision should be well related to existing buildings and make use of existing hard-standing where possible. On greenfield areas, parking should reflect landscape character, be informal in layout, and avoid permanent impervious surface treatments. iii) Separate parking bays adjacent to the proposed accommodation structures should be avoided. <p>2.The site is located outside areas with high probability of flooding (CC-D1), and:</p> <ul style="list-style-type: none"> a) where proposals meet the requirements of RT-D8 to replace existing units on static caravan sites; or b) as part of a diversification proposal for land-based businesses, sited close to the farmstead and where additional site facilities can be provided through the change of use of existing buildings(CE-S5, CE-S6); or c) as part of a diversification proposal for existing accommodation premises comprising hotels/guesthouses (C1 use), self-catering complexes, and camping and caravan sites; where there is capacity in terms of area, highway access, and existing facilities without impacting on local amenity. <p>3.Conditions will be attached to any permission to ensure that the site will be occupied and managed in a manner that will not harm the local area. Structures will be removed from the site should they become redundant to the approved use, and the site restored to its former condition - opportunities should be taken to enhance the restoration of the site that will support biodiversity and green infrastructure (CE-S2, CE-S3).</p>	
<p>Draft Policy</p>	<p>Comment</p>
<p><u>RT-D11 EQUESTRIAN DEVELOPMENT</u></p> <p>1. Proposals for equestrian development will be permitted where it can be demonstrated that individually and cumulatively they:</p> <ul style="list-style-type: none"> a) are consistent with RT-S1 Recreation & Tourism, CE-S1 Landscape Character; b) do not adversely affect the natural environment or amenity of the surrounding area or neighbouring properties either directly or indirectly including through pollution and visual intrusion (CC-S5; CE-D1); c) re-use existing buildings consistent with Policy CE-S5 Principles for the Conversion of Structural Alteration of Traditional Buildings or, where appropriate, CE-S6 Principles for the Conversion or Structural Alteration of Non-Traditional Buildings. Where this is not possible the need for a new 	<p>Potential significant effect from disturbance if sites are located near otter holts or close to sensitive habitat due to trampling,</p> <p>Lighting could cause severance of habitat used by bats outside of designated sites</p> <p>It is recommended that an item be added to 1: <i>‘There are no adverse impacts on sensitive wildlife species and habitats.’</i></p>

building must be clearly demonstrated and proposals must be consistent with other policies in this plan. Siting should be well related to existing buildings;

- d) do not cause unacceptable levels of traffic in terms of the environmental or physical capacity of the road network, and do not prejudice road safety interests (AC-D1);
- e) are appropriate to the landscape setting and the environmental capacity of the area in terms of the intensity of use or activity;
- f) are sited sensitively in terms of visual impact and, of an appropriate scale, well designed and, unobtrusive in their form, in terms of their height, position and materials including by means of enclosure. Proposals should reflect the character and form of existing traditional development (CE-S7);
- g) have adequate and suitable grazing land to support the development proposed;
- h) do not generate the need for a separate dwelling that cannot be met by an existing dwelling or through the conversion of a traditional building (HC-D4, HC-D12);
- i) are well related to suitable networks of equestrian routes which are capable of supporting the additional usage in accordance with RT-12 Access Land and Rights of Way; where appropriate, horses will be regulated to a number which will not cause harm to equestrian routes, the landscape or nature conservation; and
- j) ensure the site is managed in accordance with a land management plan agreed by the National Park Authority.

In the case of development proposals that involve the keeping of horses, the development shall be sited close to the dwelling it is intended to serve.