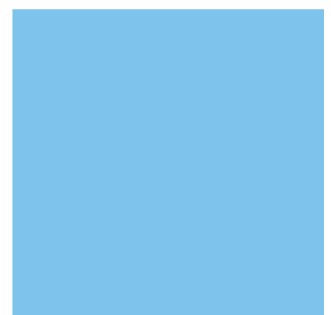
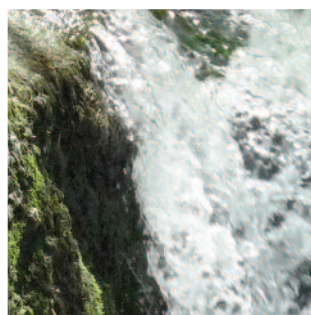
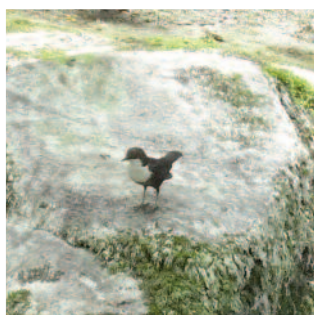
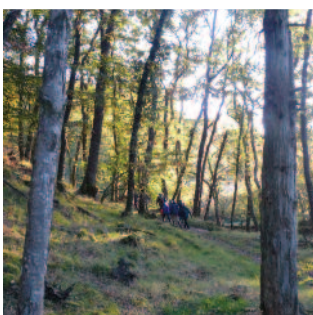
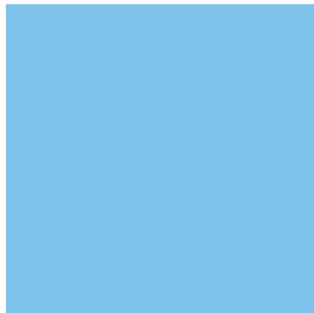




Local Development Framework Core Strategy (Local Plan)
**Vision & Objectives, General Policies
 and Strategic Options Consultation**
Sustainability Appraisal Main Report

November 2011



**Sustainability Appraisal Report
Exmoor National Park
LDF Core Strategy**

**Vision and Objectives,
General Policies
and Options**

**Final Report
For Exmoor National Park Authority**

**Clare Reid Consultancy
October 2011**

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Sustainability Appraisal Report LDF Core Strategy General Policies and Options

1. Introduction

1.1. The Sustainability Appraisal Report

1.1.1. Exmoor National Park Authority is preparing its Local Development Framework (LDF) which will guide development in the National Park over the next 20 years. The National Park Authority is required to test the emerging LDF against a set of sustainability objectives, to consider the implications of the proposed policies and strategy against social, economic and environmental criteria. This sustainability appraisal (SA) 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 will also be undertaken.

1.1.2. A Sustainability Appraisal Scoping Report was produced in November 2010, which provides a framework for undertaking testing as the draft LDF is prepared. The Scoping report provides:

- A baseline characterisation of the National Park setting out the social, environmental and economic issues that face the area.
- A summary of relevant policies, plans, programmes and objectives which inform the LDF.
- Sustainable objectives for a combined SEA / SA appraisal framework which will form the basis for any further appraisals that the Authority has to undertake as part of the LDF.
- Appropriate monitoring indicators that meet the requirements of SA / SEA

1.2. Methodology

1.2.1. This Sustainability Appraisal has been undertaken by an external consultant in consultation with ENPA staff, using the framework set out in the Scoping Report, testing the draft policies and options against the sustainability objectives and criteria. The full set of sustainability objectives, criteria and indicators is set out in **Appendix 1**.

1.2.2. The Scoping report sets out a series of topics to provide a framework for producing the SA. Each topic provides available baseline evidence compiled from plans, policies and programmes at an international, national, regional and local level, using the best available information. The broad range of topics identified are:

- 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

1.2.3. Each policy and option was assessed against the 12 topics in the SA framework, using the criteria and objectives listed in Appendix 1, and given an overall score. The scoring system is set out in **Table 1** below. An assessment was also made of how the draft policies addressed the key issues relating to each topic identified in the SA Scoping report.

Table 1 – SA scoring system

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

1.3. Consultation approach

1.3.1. This Sustainability Appraisal report will be the subject of public consultation alongside the draft LDF Vision, Objectives, General Policies and Options. The consultation documents are available on the website at www.exmoor-nationalpark.gov.uk/consultation and from the National Park offices.

1.3.2. In accordance with the requirements the three statutory bodies will also be consulted:

- Environment Agency
- English Heritage
- Natural England

2. Draft LDF Vision, Objectives and General Policies

2.1. Overview

2.1.1. The draft LDF will include a set of General Policies, which will be applied to all development requiring planning permission within the National Park (although there will also be more detailed policies as well). Three General Policies were assessed at this stage:

- General Policy 1: Achieving National Park Purposes & Sustainable Development
- General Policy 2: Sustainable Development Principles
- General Policy 3: Major Development

2.1.2. *Note: The draft policies that were the basis for this appraisal are given in **Appendix 14**. General Policies 1 and 2 were subsequently merged into one policy following discussion with the LDF Advisory Group, for the purposes of the public consultation. However, the separate assessments are included here to demonstrate how they scored against the sustainability objectives, and to report what changes were made as a result of the SA (see **Appendix 15**.)*

2.1.3. A summary of the scores for General Policies 1, 2 and 3 is given in **Table 2** (please refer to the key for the scoring system at Table 1, page 4).

Table 2 – Summary scores for General Policies 1, 2 and 3

SA topics	General Policy 1	General Policy 2	General Policy 3
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	+	++	+

2.2. **General Policy 1 – Achieving National Park Purposes and Sustainable Development**

- 2.2.1. The assessment of General Policy 1 (GP1) also included consideration of the draft Vision and Objectives for the LDF as these form part of the draft Policy. The detailed table with the full assessment of GP1 with explanations is in **Appendix 2**.
- 2.2.2. GP1 scored positively for all the SA topics, as would be expected given its purpose to Achieve National Park Purposes and Sustainable Development.
- 2.2.3. The policy scored strongly positive in relation to the SA topics **Landscape, Biodiversity, and Historic environment** due to the linkages with the National Park first purpose. However, the policy could be strengthened by a specific reference to the natural beauty, wildlife and cultural heritage of the National Park.
- 2.2.4. GP1 scored strongly positive in relation to the **Biodiversity** topic, as it encourages enhancement as well as conservation of the special qualities of the National Park, which would include wildlife and habitats. However, the draft Vision and Objectives could be strengthened by reference to ‘expanding and connecting’ habitats and creating networks of multi-functional green infrastructure.
- 2.2.5. GP1 also scored strongly in relation to the SA topics **Community and wellbeing, Economy and employment** due to the linkages with the National Park Authority’s duty to foster the social and economic wellbeing of local communities. However, references to health and wellbeing are not strong, particularly in the draft Objectives.
- 2.2.6. GP1 scored positively in relation to the SA topic of **Housing**, particularly due to the specific Objectives on housing. However the provision of affordable housing is only implicitly covered in the draft policy and vision (although it is covered in the longer vision statement). Similarly, there are specific Objectives on **Transport**, but it is only implicitly covered in the draft policy and Vision (although it is covered in the longer Vision statement).
- 2.2.7. GP1 scored positively in relation to the SA topics of **Air quality and water resources, Climate change and adaptation to flood risk, Climate change mitigation and energy, and Coast**. However for all these topics the policy is to ensure that development ‘does not adversely impact on the Vision and Objectives’ rather than positively support their delivery.
- 2.2.8. GP1 scored positively in relation to the SA topic of **Land (including agricultural, brownfield, contaminated land, waste and minerals)**, particularly in relation to making the best use of existing buildings and land, maintaining the quality of soils, and increasing recycling which are picked up in the Vision and Objectives. However, protecting the special qualities of the National Park from mineral extraction (except minor working for local building stone) is not specifically addressed, apart from reference in the vision statement to the provision of small scale stone quarries to supply local building materials.

2.3. **Recommendations for GP1**

- 2.3.1. The Sustainability Appraisal has identified a number of areas where General Policy 1 could be strengthened by amendments to the wording.

Recommendation 1: Policy GP1 is amended to insert reference to the ‘*natural beauty, wildlife and cultural heritage of the National Park*’, mirroring the wording of the National Park’s first purpose.

Recommendation 2: The Vision statement and Objectives could be strengthened by reference to ‘*expanding and connecting*’ habitats and ‘*creating networks of multi-functional green infrastructure*’.

Recommendation 3: The draft Objectives could be strengthened by reference to health and wellbeing.

Recommendation 4: The Vision could be strengthened by specific reference to affordable housing and transport.

Recommendation 5: The wording of the policy is strengthened to positively support achievement of the Vision and Objectives, rather than avoid adverse impacts on them.

Recommendation 6: The Objectives could be strengthened by reference to protecting the special qualities of the National Park from mineral extraction and supporting the supply of local building materials through small scale stone quarries.

2.4. **General Policy 2 – Sustainable Development Management Principles**¹

2.4.1. General Policy 2 (GP2) identifies a set of principles to ensure that all development conserves and enhances the National Park and contributes to sustainable development. As would be expected, it scores strongly positive or positive for all the SA topics, although there are some areas where the policy could be strengthened. The detailed table with the full assessment of GP2 with explanations is in **Appendix 3**.

2.4.2. **Air quality and water resources** - The topic is covered by Principle 9.

2.4.3. **Biodiversity and Green Infrastructure** The topic is covered by Principle 8. There is no reference to green infrastructure.

2.4.4. **Climate change mitigation and energy** - The topic is covered by Principle 10, but could be strengthened by including a reference to the sustainability and resilience of settlements (including to climate change) in principle 2, to reflect Objective H4. Principle 11 could also be improved by expanding on what is meant by the socio-economic wellbeing of local communities.

2.4.5. **Community wellbeing (including equalities and health)**. The topic is covered in the principles, but could be strengthened by specific references to health (Principle 11), services (Principle 2), safe, attractive public spaces (Principle 2), and community participation (Principle 11).

2.4.6. **Economy and employment** The topic is covered in the principles. There is no reference to key issues raised in the SA Scoping report such as the tourism and agricultural sectors, the importance of small businesses, local products and services, and local business suppliers, although it is questionable whether this level of detail could be covered by a generic set of principles. Principle 3 could be strengthened by reference to ‘local’ services, facilities and jobs.

¹ Note: Since this appraisal was undertaken, General Policies 1 and 2 have been combined into a single Policy, as explained in para 2.1.2 above. The draft policies that this appraisal is based on are given in Appendix 14

2.4.7. **Landscape and Historic environment** - These topics are covered by Principle 1, although it is quite long and could be improved and made clearer by splitting it. Principle 7 could be improved to include reference to local, traditional sustainable building materials

2.4.8. **Housing** The topic is covered implicitly in Principles 2 and 11, but there is no specific reference to housing, particularly affordable housing, or the type and mix of housing and so on.

2.4.9. **Land (including agricultural, brownfield, contaminated land, waste and minerals)**. The topic is covered by these principles. The principles could be strengthened by a reference to avoiding or reducing pollution, perhaps in Principle 9.

2.4.10. **Coast**. The topic is covered by Principle 10 in relation to flood risk.

2.4.11. **Transport**. The topic is covered by Principle 4.

2.5. **Recommendations for GP2**

2.5.1. The Sustainability Appraisal has identified a number of areas where General Policy 2 could be strengthened by amendments to the wording.

Recommendation 7 – add *'and helps create and connect habitats and networks of green infrastructure'* to Principle 8.

Recommendation 8: amend Principle 2 to read *'supports the function, sustainability and resilience of individual settlements and their communities'*.

Recommendation 9: make reference to health and community participation in Principle 11, and to services and safe, attractive public spaces in Principle 2.

Recommendation 10: add reference to 'local' services, facilities and jobs to Principle 3.

Recommendation 11: consider splitting Principle 1 into two principles (one regarding scale, siting etc and intensity of activity, and the other regarding favourable impact on character etc.)

Recommendation 12: include reference to local, traditional sustainable building materials in Principle 7.

Recommendation 13: make specific reference to affordable housing in the Principles.

Recommendation 14: include reference to avoiding or reducing pollution, perhaps in Principle 9.

2.6. **General Policy 3 – Major development**²

2.6.1. General Policy 3 (GP3) sets out the tests against which any proposals for major development would be considered. GP3 scored strongly positive for five of the SA topics of **Landscape, Biodiversity, Historic Environment, Land and Climate change and adaptation to flood risk**. It also scored positively for five other SA topics of **Air quality and water resources, Climate change mitigation and energy, Community wellbeing,**

² Note: since the appraisal was carried out, the General Policies have been amended, and the policy on Major development is numbered General Policy 2 in the consultation draft

Transport, and **Coast**. For the remaining two SA topics of **Housing** and **Economy and employment** there were some positive and negative impacts. GP3 did not score negatively or strongly negative for any of the SA topics. The detailed table with the full assessment of GP3 with explanations is in **Appendix 4**.

- 2.6.2. GP3 scored strongly positive against the SA topics of **Landscape, Biodiversity** and **Historic Environment** due to the requirement in the policy to secure National Park purposes (ie relating to the first purpose to conserve the natural beauty, wildlife and cultural heritage of the National Park). Further safeguards are provided by the tests which consider any detrimental impacts on the environment and special qualities including cumulative impacts, the scope for restoration, and the requirements for mitigation and compensation should development be permitted.
- 2.6.3. GP3 also scored strongly positive against the SA topic **Climate change and adaptation to flood risk**. The need for the development would have to be considered against national policy relating to climate change adaptation. Flood risk would need to be considered including cumulative impacts, and if the development was allowed, any potential flood risk would need to be mitigated against, for example through additional flood defences.
- 2.6.4. GP3 scored strongly positively for the SA topic of **Land**. The need to consider any potential impacts on land is implicit in test (iii) as part of 'the environment'. Any cumulative impacts on land would need to be considered, and if the development was permitted, potential harm to land would need mitigation. The land would have to be restored once the use has ceased.
- 2.6.5. GP3 scored positively for the SA topic of **Air quality and water resources**. The need to consider any potential impacts on air quality and water resources is implicit in test (iii) as part of 'the environment'. Any cumulative impacts on air quality and water resources would need to be considered, and if the development was permitted, potential harm to air quality and water resources would need mitigation.
- 2.6.6. GP3 scored positively for the SA topic of **Climate change mitigation and energy**. The need for the development would have to be considered against national policy relating to climate change mitigation and the impact on local communities.
- 2.6.7. GP3 scored positively for the SA topic of **Community wellbeing**. The need for the development would have to be considered against national policy and the impact on local communities. There may be benefits from the development for local communities in meeting their needs, for example in providing jobs or affordable housing. There would need to be mitigation or compensation for any harm if the development was permitted.
- 2.6.8. GP3 scored positively for the SA topic of **Transport**. The impact of major development on this topic would need to be considered as part of test (iv) for example in relation to the cumulative impact of traffic and congestion or greenhouse gas emissions. If the development was permitted, potential impacts from increased transport would need mitigation.
- 2.6.9. GP3 scored positively for the SA topic of **Coast**. However the policy is not strong in terms of coverage of the coast, relying on the coast being implicit as part of 'the environment', or reference in the special qualities. The unsuitability of coastal areas for major development for example due to sea level rise or topography is not captured. Despite these reservations, it was given an overall positive score due to the fact that the policy did not specifically impact negatively on the coast, and these issues would be covered by other policies.
- 2.6.10. GP3 scored +/- for **Housing** and **Economy and employment** reflecting some positive elements to the policy but also potentially some negative impacts. In relation to

Housing, the need for the development would have to be considered against the impact on local communities. There may be benefits from the development for local communities in meeting their needs, for example in providing affordable housing. The rigorous tests set out in this policy could discourage delivery of affordable housing. There would need to be mitigation or compensation for any harm if the development was permitted. Major development needs definition in the National Park context. Currently it would include proposals for more than 10 houses (small scale major housing of 10-100 houses). Similarly, in relation to **Economy and employment** there could be benefits to the economy from major development in terms of jobs. However, any major development that impacted on the natural beauty or amenity of the National Park could be a detriment to the economy, particularly tourism.

2.7. Recommendations for GP3

2.7.1. The Sustainability Appraisal has identified a number of areas where General Policy 3 could be strengthened by amendments to the wording.

Recommendation 15: Policy GP3 could be strengthened by test (vi) including the avoidance of harm, before mitigation and compensation are sought.

Recommendation 16: GP3 could be strengthened in relation to the **Community wellbeing, Economy and employment** and **Housing** topics by reference to the duty on National Park Authorities to foster the social and economic well-being of their communities.

Recommendation 17: GP3 could be strengthened in relation to the **Housing** topic by addition of reference in test (vi) to **Where a proposal for major development can demonstrate a significant net benefit to the National Park and its local communities.**

3. Draft Housing Options

3.1. Overview

3.1.1. A summary of the scores for Housing Options 1-4 is given in **Table 3** below (please refer to the key for the scoring system at Table 1, page 4). Detailed tables with the full assessment of Housing Options 1-4 with explanations are in **Appendices 5-7**.

Table 3 – Summary scores for Housing Options 1-4

SA topics	Housing Option 1 – 100% affordable housing to meet local needs	Housing Option 2 – affordable housing to address local affordable need with some local market housing	Housing Option 3 – affordable housing to address local affordable need with some local market housing and open market housing	Housing Option 4 – affordable housing to address local affordable needs with some open market housing
Air quality and water resources	+	+	+	+
Biodiversity and Green Infrastructure	++	-	+/-	+/-
Climate change & adaptation to flood risk	+/-	-	+/-	+/-
Climate change mitigation & energy	+/-	+/-	+/-	+
Community wellbeing	+/-	++	+	+/-
Economy and employment	+/-	++	+	+/-
Historic environment	++	+/-	+/-	+/-
Housing	+/-	++	+	+/-
Land	+	--	-	+/-
Landscape	++	--	-	+/-
Coast	+/-	+/-	+/-	+/-
Transport	+/-	+/-	+/-	+/-

3.2. Background to Housing Options 1-4

- 3.2.1. Exmoor National Park Authority is required to develop, appraise and consult on a number of options for providing housing in the National Park. The current approach has been to ensure all new build housing is affordable to meet the needs of local communities, reflecting the high number of households in need of affordable housing in the National Park; the high demand for open market housing within the National Park driven largely by in-migration and people moving to Exmoor to retire; and the limited available land supply due to factors such as steep land, flood risk and landscape considerations.
- 3.2.2. Evidence suggests that overall there is potential capacity for a maximum of 234 new houses on greenfield land in Exmoor's settlements with potential for a further 99 possible only with great care to ensure that the landscape is not harmed³. Since 2005, 66 new local need affordable homes have been given planning permission with a further 19 awaiting the signing of a section 106 agreement. Some of this housing has been achieved by housing associations for rent, others are owner occupied as a result of e.g. self build with a requirement that they should always be lived in by people in local affordable need. Evidence shows that there is still a high level of local affordable housing need within Exmoor National Park (a 2008 survey indicated 130 households were in housing need while recent evidence⁴ shows a current figure of over 300 households). Consultation, including with communities, has shown that affordable housing for local communities remains a priority. Consultation and work on the housing needs of the area also shows that there is a need to plan for the housing needs of an ageing population and to consider housing for working age people some of whom, but not all, may also be in need of affordable housing.
- 3.2.3. Landscape Capacity studies have identified the potential for housing on greenfield sites in Exmoor's towns and villages. This capacity is limited and long term, suitable housing sites are likely to run out. The emphasises the importance of ensuring that potential sites for new housing are used wisely.
- 3.2.4. Recently there has been a change in the funding available for new affordable housing by housing associations. Before the Comprehensive Spending Review in October 2010, sufficient levels of grant funding for rural local affordable housing (provided through Housing Associations) were available to develop new affordable homes for rent within the National Park. Levels of grant funding are currently much lower than they were and this cut in funding together with changes to how it is offered to Housing Associations means that, in the foreseeable future, building new local need affordable homes for rent by Housing Associations will be limited or even halted.
- 3.2.5. The options developed by the National Park Authority present four alternatives for supporting affordable housing to address the needs of local communities – option 1 continues the present approach by only allowing for affordable housing to address the needs of local communities. Options 2, 3 and 4 also continue to require 100% affordable housing to address the needs of local communities but consider alternative methods of raising finance for it where required.
- 3.2.6. Definitions for the different kinds of housing used in the Options are given in **Table 4** below.

³ Landscape capacity study

⁴ Nathaniel Litchfield study

Table 4 – Definitions for Housing Options

Affordable housing to address local needs = housing for people who can demonstrate that they are in housing need, have a local connection (through living or working in the National Park or needing to live close to their place of work), and unable to afford housing on the open market. These homes can be rented e.g through a Housing Association or owner occupied e.g self build with a local tie for future purchasers

Local Housing = housing only for local people through living or working in the National Park but who may not qualify as being in affordable need e.g. an elderly person who wishes to downsize, a couple/family in a flat who wish to move to a family home or someone who needs to work in the National Park. A local tie would be likely to reduce the value compared to an open market home. Some other National Parks allow for this kind of housing.

Open market housing = housing which has no occupancy restriction or legal tie that can be bought by anyone (i.e. the majority of existing housing within the National Park).

3.3. Housing Option 1 – 100% affordable housing to meet local needs

- 3.3.1. Housing Option 1 in effect continues the current policy of requiring 100% affordable housing to meet local needs as far as possible with housing grant and/or using any developer contributions e.g. from change of use if allowed for in policy and if available and where there is suitable land available and sufficient land capacity.
- 3.3.2. Housing Option 1 scored strongly positive for three of the SA topics, namely **Biodiversity & Green Infrastructure, Historic Environment, and Landscape**. It scored positively for two other SA topics, of **Air quality and water resources** and **Land**. For the remaining seven SA topics of **Climate change & adaptation to flood risk, Climate change mitigation & energy, Coast, Community wellbeing, Housing, Economy & employment, and Transport** there were some positive and some negative impacts.
- 3.3.3. Housing Option 1 scored strongly positive for **Biodiversity & Green Infrastructure, Historic Environment, and Landscape**. This Option ensures that the limited supply of suitable land is only used for the most needed (affordable) housing, thereby minimizing overall impacts on biodiversity, historic environment, and landscape character (as overall levels of house building will be limited). At the same time, there would be limited opportunity for enhancement from any development.
- 3.3.4. Housing Option 1 scored positively for **Air quality and water resources** and **Land**. There is likely to be limited house building under this option so the impact on overall air quality or water resources is likely to be limited. This Option ensures that the limited supply of suitable land is only used for the most needed (affordable) housing, thereby minimizing overall demands for land. The requirement to build to affordable homes to higher levels of sustainable construction could support greater use of recycled materials, local building materials reduced waste and so on. However this Option may limit potential to re-use certain sites particularly contaminated land (and therefore improve them by removing contamination) due to the impact on viability.
- 3.3.5. There were both positive and negative impacts from this Option for the remaining SA topics.
- 3.3.6. In relation to the SA topics of **Climate change, adaptation to flood risk, and the Coast** Housing Option 1 ensures that the limited supply of suitable land is only used for the most needed (affordable) housing, thereby minimizing overall demands for land and consequently reduces the likelihood of having to build in areas at risk of flooding or vulnerable coastal areas. However, it also means that in situations such as Porlock Weir where communities are

at risk of flooding, restricting new build to affordable needs only could prevent families from relocating.

- 3.3.7. In relation to **Climate change mitigation and energy**, Housing Option 1 would encourage new build to be to higher standards of sustainable construction through the Code for Sustainable Homes (if grant funded). However, the requirement to build to Code Level 3 has increased the cost and could affect overall viability of the development (although some recent evidence from Government suggests that costs are declining).
- 3.3.8. In relation to the SA topics of **Community wellbeing** and **Housing**, Housing Option 1 is positive in focusing provision only on meeting the demonstrated need for affordable housing in communities. This approach applies to single new homes e.g. for self builds as well as a number of houses on a site. Requiring all new housing to be for local affordable needs ensures that land values remain lower and more affordable so enabling housing associations and individuals to acquire land specifically for affordable housing. Restricting provision to local people may also help to maintain strength of community and support retention of services. However, in the foreseeable future, delivery of affordable housing is likely to be very limited or potentially halted if housing grant remains at current levels due to reductions in Government housing grant - although grant levels may change over the lifetime of the plan. This Option could also restrict opportunities for other housing needs to be met, e.g for older people wishing to downsize or families requiring larger houses. It is also uncertain whether the specific needs of agricultural and forestry workers would still be met under this option.
- 3.3.9. In relation to **Economy & employment**, Housing Option 1 is positive in targeting provision at local people thereby helping to provide housing for people working locally who could not otherwise afford to live near to where they work. However there are also some negative implications of this Option, as the limited number of new houses likely to be built will restrict local employment in construction. The limited supply of new housing could also affect businesses who struggle to recruit workers who are not in affordable housing need. In addition, affordable housing tends to be restricted in size and therefore may not be suitable for enabling home working/flexible working.
- 3.3.10. In relation to **Transport**, under Housing Option 1 there are likely to be lower overall levels of new house building, which will create less traffic and emissions. However, the potential lack of available suitable housing for workers could lead to increased commuting, and the limited numbers of houses being built could restrict opportunities (due to limited finance) for transport enhancements such as opportunities for walking and cycling.

3.4. Housing Option 2 - affordable housing to address local affordable need with some local market housing

- 3.4.1. Housing Option 2 scored strongly positive for three of the SA topics, namely **Community wellbeing, Housing, and Economy & employment**. It scored positively for one other SA topic - **Air quality and water resources**. This Option also scored strongly negative for two SA topics, namely **Landscape** and **Land**. It scored negatively for two other SA topics, **Biodiversity & Green Infrastructure** and **Climate change & adaptation to flood risk**. For the remaining four SA topics of **Climate change mitigation & energy, Coast, Historic Environment, and Transport** there were some positive and some negative impacts.
- 3.4.2. Housing Option 2 scored strongly positive for **Community wellbeing, Housing, and Economy & employment**. Whilst the focus is still on delivering affordable housing, this Option also allows for new local need affordable homes and other new build non-affordable local housing such as older people wishing to downsize or families requiring larger houses. A

local tie would be likely to reduce the value compared to an open market home, keeping the housing more affordable for local people. In addition, evidence indicates that local housing could help provide contributions to help deliver affordable homes for local communities. Targeting provision at local people will also help the local economy as it will provide housing for people working locally who could not otherwise afford to live near to where they work. This could help businesses who struggle to recruit workers who are not in affordable housing need. It may also enable some housing stock to be larger which would be more suitable for home working or flexible working. Although overall levels of new build housing are still likely to be small, Housing Option 2 would result in more houses than in Option 1, which could support more local employment in construction.

- 3.4.3. Housing Option 2 scored positively for **Air quality and water resources**. Although there may be more housing built under this option than Option 1, this is still likely to be limited in terms of overall numbers, and consequently the impact on air quality or water resources is not considered likely to be significant.
- 3.4.4. Housing Option 2 also scored strongly negative for two SA topics, namely **Landscape and Land**. Allowing for new local (non affordable) housing to cross- subsidise affordable housing would require more housing in a development and therefore more housing in total and so use up more of the limited sites and land suitable for housing in the National Park resulting in greater potential impact on landscape character. As land values are likely to be lower, Housing Option 2 may not raise sufficient finance to enable contaminated land to be improved, although there may be some opportunity for redevelopment of existing inappropriate development which would improve settlement character.
- 3.4.5. Housing Option 2 scored negatively for **Biodiversity & Green Infrastructure and Climate change & adaptation to flood risk**. Local market housing will generate less value from a site and so contributions are likely to be prioritised on affordable housing provision with no or limited finance available for other enhancements such as biodiversity enhancement or the provision of Green Infrastructure. There is also likely to be more pressure on the limited supply of land, which could lead to increased likelihood of detrimental impact on biodiversity or having to build in areas at risk of flooding
- 3.4.6. For the SA topic of **Climate change mitigation & energy**, Housing Option 2 has both positive and negative impacts. The continued focus on provision of affordable housing would contribute to climate change mitigation and energy conservation as registered providers (Housing Associations) are currently required to build to higher standards of sustainable construction through the Code for Sustainable Homes (if grant funded). However, the requirement to build to Code Level 3 has increased construction costs (although some recent evidence from Government suggests that costs are declining), which under the lower finance likely to be raised under a local market option, could affect viability.
- 3.4.7. For the SA topic of **Coast**, Housing Option 2 has both positive and negative impacts. On the positive side, in situations where communities are at risk of flooding, allowing some local market housing could provide opportunities for relocation. However there is likely to be more pressure on the limited supply of land, which could lead to increased likelihood of having to build in vulnerable coastal areas.
- 3.4.8. For the SA topic of **Historic Environment**, Housing Option 2 has both positive and negative impacts. There is likely to be a low level of overall housing built under this option (although slightly more than Option 1). Consequently there is likely to be limited impact on the historic environment – although this will depend on largely on location and level of overall need. However, there are also likely to be limited opportunities for conservation enhancement as local market housing will generate less value from a site and so contributions are likely to be

prioritised on affordable housing provision with no or limited finance available for other enhancements.

3.4.9. For the SA topic of **Transport**, Housing Option 2 has both positive and negative impacts. This option may provide additional suitable housing for workers and reduce the need for commuting. However, it is likely to result in more housing overall and so will create more traffic and emissions.

3.5. **Housing Option 3 – affordable housing to address local affordable need with some local market housing and open market housing**

3.5.1. Housing Option 3 did not score strongly positive for any of the SA topics. It scored positively for four of the SA topics, namely **Air quality and water resources, Community wellbeing, Housing, and Economy & employment**. Housing Option 3 did not score strongly negative for any SA topic, although it did score negatively for two SA topics, namely **Landscape and Land**. For the remaining six SA topics of **Biodiversity & Green Infrastructure, Climate change & adaptation to flood risk, Climate change mitigation & energy, Coast, Historic Environment, and Transport** there were some positive and some negative impacts.

3.5.2. Housing Option 3 scored positively for **Air quality and water resources**. Although there may be more housing built under this option than Option 1, this is still likely to be limited in terms of overall numbers, and consequently the impact on air quality or water resources is not considered likely to be significant.

3.5.3. Housing Option 3 scored positively for **Community wellbeing, Housing, and Economy & employment**. The overall focus is still on providing affordable housing, and evidence indicates that local and open market housing can provide contributions to help fund affordable homes for local communities. In addition, this Option allows for new local need affordable homes and other new build non-affordable local housing such as older people wishing to downsize or families requiring larger houses. Open market housing could also provide additional contributions to deliver community infrastructure. However, Open market housing would cater for demand but not necessarily need and would not have a local tie. It could also lead to additional second homes that do not necessarily maintain strength of community and support retention of services. Despite these negatives this Option was considered on balance to score positive overall for Community well-being and Housing. Similarly, in relation to **Economy & employment**, this Option was considered to score positively overall, as targeting provision at local people will help the local economy as it will provide housing for people working locally who could not otherwise afford to live near to where they work. This could help businesses who struggle to recruit workers who are not in affordable housing need. It may also enable some housing stock to be larger which would be more suitable for home working or flexible working. Although overall levels of new build housing are still likely to be small, Housing Option 3 would result in more houses than in Option 1, which could support more local employment in construction. There may be some negatives as evidence suggests that open market housing could lead to increased in-migration by retired people who would not be economically active.

3.5.4. Housing Option 3 scored negatively for the SA topics of **Landscape and Land**. Allowing for new local and open market housing to cross subsidise affordable housing would require more housing in a development and therefore more housing in total and so use up more of the limited sites and land suitable for housing in the National Park with greater potential impact on landscape character. There are some potential positive outcomes from this Option, as it may raise sufficient finance to enable enhancements such as improvement of contaminated land or landscape enhancements including the removal of existing inappropriate development, due to

the increased value from open market housing. As with all the Options, the requirement to build to affordable homes to higher levels of sustainable construction could support greater use of recycled materials, local building materials, reduced waste and so on.

- 3.5.5. For the SA topic of **Biodiversity & Green Infrastructure**, Housing Option 3 has both positive and negative impacts. On the positive side, this Option could provide more opportunities for biodiversity enhancement or Green Infrastructure due to the increased value from open market housing. However, there is likely to be more pressure on the limited supply of land, which could lead to increased likelihood of detrimental impact on biodiversity.
- 3.5.6. For the SA topic of **Climate change & adaptation to flood risk**, Housing Option 3 has both positive and negative impacts. On the positive side, this option could provide more opportunities for flood defences due to the increased value from open market housing. However, there is likely to be more pressure on the limited supply of land, which could lead to increased likelihood of having to build in areas at risk of flooding.
- 3.5.7. For the SA topic of **Climate change mitigation & energy**, Housing Option 3 has both positive and negative impacts. The continued focus on provision of affordable housing would contribute to climate change mitigation and energy conservation as registered providers (Housing Associations) are currently required to build to higher standards of sustainable construction through the Code for Sustainable Homes (if grant funded). The requirement to build to Code Level 3 has increased construction costs (although some recent evidence from Government suggests that costs are declining), which could affect the viability of the site, particularly if local market housing is being sought, although open market housing is likely to generate higher value and viability would be less likely to be affected. On the negative side, there will be an overall higher level of housing and consequently greenhouse gas emissions could be higher, although this could be mitigated by building to higher standards of sustainable construction.
- 3.5.8. For the SA topic of **Coast**, Housing Option 3 has both positive and negative impacts. On the positive side, in situations where communities are at risk of flooding, allowing some local market housing could provide opportunities for relocation. However there is likely to be more pressure on the limited supply of land, which could lead to increased likelihood of having to build in vulnerable coastal areas.
- 3.5.9. For the SA topic of **Historic Environment**, Housing Option 3 has both positive and negative impacts. This option could provide more opportunities for historic environment enhancement due to the increased value from open market housing. However, there is likely to be more pressure on the limited supply of land, which could lead to increased likelihood of detrimental impact on the historic environment.
- 3.5.10. For the SA topic of **Transport**, Housing Option 3 has both positive and negative impacts. This option may provide additional suitable housing for workers and reduce the need for commuting. The flexibility to include open market housing could generate additional finance which may enable transport enhancements such as opportunities for walking, cycling and so on. However, it is likely to result in more housing overall and so will create more traffic and emissions.
- 3.6. **Housing Option 4 – affordable housing to address local affordable needs with some open market housing**
- 3.6.1. Housing Option 4 did not score strongly positive for any of the SA topics. It scored positively for two of the SA topics, namely **Air quality and water resources**, and **Climate change mitigation & energy**. Housing Option 4 did not score strongly negative or negative for any

SA topic. For the remaining ten SA topics of **Biodiversity & Green Infrastructure, Climate change & adaptation to flood risk, Community wellbeing, Historic Environment, Housing, Economy & employment, Landscape, Land, Coast, and Transport** there were some positive and some negative impacts.

- 3.6.2. Housing Option 4 scored positively for **Air quality and water resources**. Although there may be more housing built under this Option than Option 1, this is still likely to be limited in terms of overall numbers, and consequently the impact on air quality or water resources is not considered likely to be significant.
- 3.6.3. Housing Option 4 scored positively for **Climate change mitigation & energy**. The continued focus on provision of affordable housing would contribute to climate change mitigation and energy conservation as registered providers (Housing Associations) are currently required to build to higher standards of sustainable construction through the Code for Sustainable Homes (if grant funded). The requirement to build to Code Level 3 has increased construction costs (although some recent evidence from Government suggests that costs are declining), but open market housing is likely to generate higher value and would be less likely to be affected. Whilst there will be an overall higher level of housing and consequently greenhouse gas emissions could be higher, this was considered to be mitigated by building to higher standards of sustainable construction.
- 3.6.4. For the SA topic of **Economy & employment**, Housing Option 4 has both positive and negative impacts. The provision of additional open market housing could help businesses who struggle to recruit workers who are not in affordable housing need. It may also enable some housing stock to be larger which would be more suitable for home working or flexible working. Although overall levels of new build housing are still likely to be small, Housing Option 4 would result in more houses than in Option 1, which could support more local employment in construction. However, there may also be some negative impacts as evidence suggests that open market housing could lead to increased in-migration by retired people who would not be economically active.
- 3.6.5. For the SA topics of **Biodiversity & Green Infrastructure, and Historic Environment** Housing Option 4 has both positive and negative impacts. This Option could provide more opportunities for enhancement of biodiversity, Green Infrastructure networks, or historic environment due to the increased value from open market housing. However, there is also likely to be more pressure on the limited supply of land, which could lead to increased likelihood of detrimental impact on biodiversity or the historic environment.
- 3.6.6. For the SA topics of **Climate change & adaptation to flood risk**, Housing Option 4 has both positive and negative impacts. This Option could provide more opportunities for flood defences due to the increased value from open market housing. However, there is likely to be more pressure on the limited supply of land, which could lead to increased likelihood of having to build in areas at risk of flooding.
- 3.6.7. For the SA topics of **Housing and Community wellbeing**, Housing Option 4 has both positive and negative impacts. Evidence indicates that open market housing can provide contributions to help fund affordable homes for local communities due to higher values from land, and could potentially also provide contributions to additional benefits such as deliver community infrastructure. However, open market housing would cater for demand but not necessarily need and would not have a local tie. It could also lead to additional second homes that do not necessarily maintain strength of community and support retention of services.
- 3.6.8. For the SA topics of **Landscape and Land**, Housing Option 4 has both positive and negative impacts. Allowing for new open market housing to cross subsidise affordable housing would

require more housing in a development and therefore more housing in total and so use up more of the limited sites or land suitable for housing in the National Park with greater potential impact on landscape character. However, this option could provide more opportunities for enhancements such as the improvement of contaminated land or the removal of previous inappropriate development, due to the increased value from open market housing. The requirement to build to affordable homes to higher levels of sustainable construction could also support greater use of recycled materials, local building materials, reduced waste and so on.

3.6.9. For the SA topic of **Coast**, Housing Option 4 has both positive and negative impacts. In situations where communities are at risk of flooding, allowing some open market housing could provide more flexible opportunities for relocation. However, there is likely to be more pressure on the limited supply of land, which could lead to increased likelihood of having to build in vulnerable coastal areas

3.6.10. For the SA topic of **Transport**, Housing Option 4 has both positive and negative impacts. This option may provide additional suitable housing for workers and reduce the need for commuting. It could also generate additional finance which may enable transport enhancements such as opportunities for walking, cycling and so on. However, this option is likely to result in more housing overall and so will create more traffic and emissions.

4. Draft Settlement Hierarchy Options

4.1. Overview

4.1.1. An overview of the scores for the Settlement Hierarchy Options A-C is given in Table 5 below (please refer to the key for the scoring system at Table 1, page 4). Detailed tables with the full assessment of Settlement Hierarchy Options A-C with explanations are in **Appendices 9-11**.

Table 5 – Summary scores for Settlement Hierarchy Options A-C

SA topics	Option A – all settlements listed in existing Local Plan.	Option B – development only in those towns and villages with a school, a regular bus service which runs 5+ times a week and a shop	Option C – all settlements listed in existing Local Plan AND settlements with a shop and/or pub and/or village hall
Air quality and water resources	+	-	+/-
Biodiversity and Green Infrastructure	+	+/-	+/-
Climate change & adaptation to flood risk	-	-	+/-
Climate change mitigation & energy	+	+	-
Community wellbeing	+/-	+/-	++
Economy and employment	+/-	+/-	++
Historic environment	-	+/-	+/-
Housing	+/-	-	++
Land	+	-	+
Landscape	+	+/-	-
Coast	-	-	+/-
Transport	+/-	+/-	-

4.2. Background to the draft Settlement Hierarchy Options

4.2.1. The National Park Authority is required to identify, appraise, and consult on a number of options for delivering development within the National Park. Given the National Park status, locations for new development are limited, and must not be to the detriment of the statutory purposes for which the National Park is designated.

4.2.2. Three spatial Options have been identified:

- **Option A** continues the current Local Plan approach of focusing new development in a number of towns and villages listed within the Local Plan. *These currently include Dulverton, Lynton and Lynmouth, Porlock, Allerford, Barbrook, Bridgetown, Brendon, Challacombe, Cutcombe, Dunster, Exford, Exton, Luccombe, Luxborough, Monksilver, Parracombe, Roadwater, Simonsbath, Timberscombe, Winsford, Withypool, Wheddon Cross and Wootton Courtney.*
- **Option B** proposes that new development is concentrated in a smaller number of settlements where there is a school, a regular bus service which runs 5+ times a week and a shop, namely *Cutcombe/Wheddon Cross, Dulverton, Dunster, Exford, Lynton and Lynmouth, Parracombe, Porlock and Timberscombe.*
- **Option C** includes the settlements currently listed in the Local Plan, it also proposes that this could be expanded to include additional settlements. Potential additional settlements with a shop and/or pub and/or village hall are identified, namely *Hawkridge, Twitcheen, Heasley Mill, Kentisbury/Kentisbury Town, Trentishoe, Martinhoe, Countisbury, Rockford, Oare, Porlock Weir, West Porlock, Bossington, Selworthy, Withycombe, Nettlecombe, Elworthy*⁵.

4.2.3. All of the Options are based on the premise that new development would only be allowed where there are suitable or potential sites in terms of the capacity of the settlement to accommodate new development without significant impacts on the landscape and where the proposed development is in scale with the current settlement.

4.2.4. An analysis of the towns and villages within the National Park has been produced as part of the evidence base for the LDF, and to inform the settlement hierarchy. An overview of the services and facilities available in the settlements listed in the current Local Plan is given in **Appendix 12**, and a similar assessment of smaller settlements is given in **Appendix 13**. These have been used to inform the assessment of the options below. A Landscape capacity study is being carried out for the current listed settlements, and if any additional settlements from Option B are supported by the consultation and go forward into the LDF, additional landscape capacity assessments would need to be undertaken of these settlements.

4.3. Option A – allow new development only in the settlements listed in the existing Local Plan

4.3.1. Option A scores positively for five of the SA topics of **Air quality and water resources, Biodiversity & Green Infrastructure, Climate change mitigation & energy, Land, and Landscape**. It scores negatively for three SA topics of **Climate change & adaptation to flood risk, Historic environment, and Coast**. For the remaining SA topics of **Community wellbeing, Economy and employment, Housing and Transport** there are a mix of positive and negative impacts.

⁵ Note: this list of settlements was subsequently revised to remove settlements that on further investigation were found to not meet the criteria. The settlements that were removed are: *Kentisbury/Kentisbury Town, Trentishoe, Bossington, Nettlecombe, and Elworthy*

- 4.3.2. Option A scored positively for **Air quality and water resources**, as there is likely to be limited overall levels of new development. The main impacts on air quality and demands on water resources in the National Park are external, as identified in the SA Scoping Report. There may be issues regarding water resources for some settlements that do not have mains water (any additional new build would have to rely on private supplies), but this is not likely to be significant.
- 4.3.3. Option A scored positively overall for **Biodiversity & Green Infrastructure** and **Landscape** as focusing new build in the listed settlements reduces the impact on biodiversity in the wider countryside and protects the landscape character of the rest of the National Park. Landscape capacity studies have shown that there are suitable and potential sites within the listed settlements to accommodate small scale development. There may also be opportunities for enhancement of biodiversity or landscape character. It is recognised however that although all development would be subject to safeguards in policies, proposals could still have the potential to impact on the biodiversity, landscape, open space and the character of the listed settlements.
- 4.3.4. Option A scored positively for **Land** as focusing new development on the listed settlements makes use of the existing stock of accommodation, buildings and brownfield land to reduce the need for greenfield development. Landscape capacity studies have shown that there are suitable and potential sites within the listed settlements to accommodate small scale development. There could be some loss of the best and most versatile agricultural land around those listed settlements on the eastern edge of the National Park, although this is not likely to be significant.
- 4.3.5. Option A scored positively for **Climate change mitigation & energy** as focusing new build development in the listed settlements where jobs and services are located will reduce the need to travel and therefore reduce greenhouse gas emissions.
- 4.3.6. For the SA topics of **Community wellbeing, Economy and employment, Housing** and **Transport** there are a mix of positive and negative impacts. Option A allows development in the listed settlements, which could meet the requirements of those communities including increased housing provision and jobs, support for local services, and so on. However, restricting new development only to those settlements listed may mean that the needs of other communities may not be met.
- 4.3.7. Option A scores negatively for the SA topics of **Climate change & adaptation to flood risk**, and **Coast** as the current list includes settlements that are vulnerable to sea level rise and flood risk, although all development would be subject to safeguards in policies, and levels of development will be dependent on the capacity of the settlement and available suitable land.
- 4.3.8. Option A also scores negatively for **Historic environment**, as new development is focused in towns and villages which form an important part of the character of the National Park and have valued heritage assets such as listed buildings. Some of the listed settlements are Conservation Areas, namely Allerford, Luccombe, Dunster, Dulverton, Lynton and Lynmouth, Paracombe, Porlock and Wootton Courtney. There may be some opportunities for enhancement of heritage assets, but this is likely to be on an individual site basis.

4.4. **Option B – allow new development only in a smaller number of towns and villages**

- 4.4.1. Option B scores positively for one SA topic, **Climate change mitigation & energy**. It scores negatively for six SA topics of **Air quality and water resources, Climate change & adaptation to flood risk, Housing, Land, and Coast**. For the other SA topics of **Biodiversity & Green Infrastructure, Community wellbeing, Economy & employment, Historic environment, Landscape** and **transport** there are a mix of positive and negative impacts.
- 4.4.2. Option B scores positively for **Climate change mitigation & energy**, as focusing new build development in the smaller number of listed settlements where jobs and services are located will reduce the need to travel and therefore reduce greenhouse gas emissions.
- 4.4.3. Option B scores negatively for **Air quality and water resources** as there is some evidence that air quality in larger settlements may be being affected by increase in particulates from burning oil and wood fuel (the main sources of heat due to lack of mains gas within Exmoor). This could be exacerbated by concentrating all new build within the listed settlements.
- 4.4.4. Option B scores negatively for **Climate change & adaptation to flood risk**, as the list includes settlements that are vulnerable to sea level rise and flood risk, and although all development would be subject to safeguards in policies, these risks are likely to be exacerbated due to concentration of development, limited capacity of the settlement and available suitable land.
- 4.4.5. Option B scores negatively for the SA topics of **Land** and **Housing** as it would limit the availability of land available for new development. Housing needs through new build would not be addressed in other (smaller) settlements (though reuse of buildings for local needs affordable housing could be allowed for). New build development would only be allowed in other settlements aside from permitted development rights and in very specific circumstances such as for agriculture or forestry or for farm shops/diversification for example. As a consequence, overall levels of affordable housing need may not be provided for due to the lack of sufficient suitable and potential land within the smaller number of settlements listed (due to landscape capacity and other restrictions). However, the focus of policy would still be on meeting affordable housing need.
- 4.4.6. Option B scores negatively for the **Coast**, as the list includes settlements (Lynmouth) that are vulnerable to sea level rise and flood risk, although all development would be subject to safeguards in policies, and levels of development will be dependent on the capacity of the settlement and available suitable land.
- 4.4.7. Option B has a mix of positive and negative impacts on **Biodiversity & Green Infrastructure**. Focusing new build in a restricted number of settlements reduces the impact on biodiversity in the wider countryside. However proposals would have the potential to impact on the biodiversity and green infrastructure of the listed settlements, although all development would be subject to safeguards in policies. The concentration of new development in a smaller number of settlements could also have potential adverse impacts on protected species such as bats and otters.
- 4.4.8. Option B has a mix of positive and negative impacts on **Landscape**. Restricting new development to a smaller number of listed settlements protects the landscape character of the rest of the National Park. Although all development would be subject to safeguards in policies, proposals would have the potential to impact on landscape, open space and the character of the listed settlements. Landscape capacity studies have shown that there may not be

sufficient suitable and potential sites within the smaller number of listed settlements to provide for identified housing need.

4.4.9. Option B has a mix of positive and negative impacts on the **Historic environment**.

Restricting new development to a smaller number of listed settlements protects the historic environment of the rest of the National Park. However, proposals would have the potential to impact on the character of the listed settlements, although all development would be subject to safeguards in policies. These impacts could be more significant due to the concentration of development in a smaller number of settlements. Dunster, Dulverton, Lynton and Lynmouth, Paracombe and Porlock are all Conservation Areas.

4.4.10. There are a mix of positive and negative impacts for Option B in relation to **Community wellbeing, Economy & employment**. New development in these settlements could support local businesses and services, provide jobs and strengthen the community. However, restricting new development to only a smaller number of listed settlements may mean that the housing or employment and development needs of other communities may not be met.

4.4.11. There are a mix of positive and negative impacts for Option B in relation to **Transport** as focusing new build development in the listed settlements where jobs and services are located will reduce the need to travel and therefore reduce greenhouse gas emissions. However, focusing new build development in existing settlements could increase traffic and congestion within those settlements.

4.5. **Option C – allow new development in the settlements listed in existing Local Plan AND additional identified settlements**

4.5.1. Option C scores strongly positive for three of the SA topics of **Community wellbeing, Housing, and Economy & employment**. It also scores positively for **Land**. Option C scores negatively for three SA topics of **Climate change mitigation & energy, Landscape and Transport**. For the remaining SA topics of **Air quality and water resources, Biodiversity & Green Infrastructure, Climate change & adaptation to flood risk, Historic environment, and Coast** and there are a mix of positive and negative impacts.

4.5.2. Option C scores strongly positive for the SA topics of **Community wellbeing, Housing, and Economy & employment** as it would allow for development in a wider range of communities, which could meet the needs of those communities including housing, employment land, jobs, support for local services, and could strengthen the community in the chosen settlements.

4.5.3. Option C scores positively for **Land** as the identification of additional settlements for new development could potentially increase the overall level of land available. However, there could be some loss of the best and most versatile agricultural land around those listed settlements on the eastern edge of the National Park. The additional list of settlements includes Bossington, Selworthy Nettlecombe and Elworthy within this area.

4.5.4. Option C has a mix of positive and negative impacts on **Air quality and water resources**, as there is likely to be limited overall levels of new development. The main impacts on air quality and demands on water resources in the National Park are external, as identified in the SA Scoping Report. However, there may be issues regarding water resources for some settlements that do not have mains water (any additional new build would have to rely on private supplies), and this could be more significant than Option A given the additional number of smaller settlements identified.

- 4.5.5. Option C has a mix of positive and negative impacts on **Biodiversity & Green Infrastructure**, as focusing new build in the listed settlements provides potential opportunities to enhance green infrastructure networks within those settlements and out into the wider countryside. However, Option C would be likely to increase both the range of settlements and the amount of new build development allowed for within the National Park and although any development would be subject to safeguards in policies, proposals would have the potential to impact on the biodiversity and green infrastructure of the listed settlements and any other additional settlements identified.
- 4.5.6. Option C has a mix of positive and negative impacts on the SA topics of **Climate change & adaptation to flood risk** and **Coast**. Although all development would be subject to safeguards in policies, the current list includes settlements that are vulnerable to sea level rise and flood risk. Levels of development will be dependent on the capacity of the settlement and available suitable land. The additional settlements include Porlock Weir, Heasley Mill, Rockford, Bossington which are all vulnerable to flood risk. However, the inclusion of settlements such as Porlock Weir, where communities are at risk of flooding, could enable the relocation of existing development. This could be achieved by designating Coastal Change Management Areas.
- 4.5.7. Option C has a mix of positive and negative impacts on the **Historic environment**. It would be likely to increase both the range of settlements and the amount of new build development allowed for within the National Park and although any development would be subject to safeguards in policies, proposals would have the potential to impact on the character of the listed settlements. The additional settlements include Porlock Weir, Bossington and Selworthy, which are all Conservation Areas. However, allowing development within additional settlements could also enable conservation enhancements such as bringing listed or historic buildings back into use.
- 4.5.8. Option C scores negatively **Landscape** as it would be likely to increase both the range of settlements and the amount of new build development allowed for within the National Park and although any development would be subject to safeguards in policies, proposals would have the potential to impact on landscape, open space and the character of the listed settlements and any additional settlements identified. Landscape capacity studies would need to be undertaken of any additional settlements included in the LDF.
- 4.5.9. Option C also scores negatively **Climate change mitigation & energy** and **Transport** as the inclusion of a wider range of settlements could increase the need to travel for jobs and services and therefore increase greenhouse gas emissions.

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 	<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.

Topic	Objectives	Criteria – will the proposals in the Plan....	Indicators
		environment?	<ul style="list-style-type: none"> • Number of applications with provision for protected/important habitats. • Number of applications where a wildlife survey has been submitted.
<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,</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 	<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

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Topic	Objectives	Criteria – will the proposals in the Plan....	Indicators
	<p><i>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>	<p>sustainable building design and methods?</p> <ul style="list-style-type: none"> ➤ Encourage travel by sustainable means of transport? 	<p>building regulation requirements).</p>
<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 	<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>population?</p> <ul style="list-style-type: none"> ➤ 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? 	
<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</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 	<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

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Topic	Objectives	Criteria – will the proposals in the Plan....	Indicators
	<p><i>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>	<p>for broadband and mobile technology that is sympathetic to the National Park setting?</p> <ul style="list-style-type: none"> ➤ Work with local employers to support/promote flexible / home working and ICT innovations? ➤ Support local businesses and suppliers? 	<p>initiatives or schemes.</p> <ul style="list-style-type: none"> • 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

Topic	Objectives	Criteria – will the proposals in the Plan....	Indicators
			<ul style="list-style-type: none"> ○ Other ● Number of applications permitted for development for game-bird shooting. ● Number of applications approved for equestrian development.
<p>Historic Environment</p>	<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.

Topic	Objectives	Criteria – will the proposals in the Plan....	Indicators
Housing	<p>9. To help ensure that National Park communities have access to appropriate, good quality, sustainable, affordable housing.</p> <p><i>Explanation: 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.
Land (including agricultural, brownfield,	<p>10. To promote sustainable forms of development and sustainable use of natural resources.</p>	<ul style="list-style-type: none"> ➤ Promote sustainable mineral extraction? ➤ Promote the reuse of land and buildings? 	<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

Topic	Objectives	Criteria – will the proposals in the Plan....	Indicators
contaminated land, waste and minerals)	<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"> ➤ 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? 	<p>(need a GIS layer available on PACS).</p> <ul style="list-style-type: none"> • 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.
Landscape	<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 	<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)

Topic	Objectives	Criteria – will the proposals in the Plan....	Indicators
		landscape? ➤ Contribute to the wild, remote and tranquil setting of Exmoor?	<ul style="list-style-type: none"> • 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.
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>	<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 	<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.

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Topic	Objectives	Criteria – will the proposals in the Plan....	Indicators
	<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>	<p>safe horse-riding, cycling and walking as an alternative to car travel?</p> <ul style="list-style-type: none"> ➤ 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? 	

Appendix 2 – Sustainability Appraisal detailed assessment of General Policy 1

SA topics	General Policy 1 – Achieving National Park Purposes and Sustainable Development
Air quality and water resources	<p>GP1 requires development to ‘not adversely impact on the Vision and Objectives of the Exmoor National Park Partnership Plan and Local Plan’. This topic is covered by: <i>Vision statement - Air, water and soil are unpolluted</i> <i>Objective - D1 To conserve and enhance Exmoor’s natural resources and to improve air and water quality, conserve water resources, ensure soils are in good condition, maximise carbon storage, and minimise pollution</i></p> <p>The main impacts on air quality and water resources in the National Park are external, as identified in the SA Scoping Report.</p> <p>Score: + The topic is covered by the Vision and Objectives, however the wording of the policy could be strengthened to positively support achievement of the Vision and Objectives, rather than just ‘not adversely impact’ on them.</p>
Biodiversity and Green Infrastructure	<p>GP1 requires development to be consistent with the National Park’s legal purposes, which include the conservation and enhancement of natural beauty, <i>wildlife</i> and cultural heritage. GP1 requires development to conserve and enhance the National Park and its special qualities. One of the special qualities is <i>A mosaic of habitats supporting a great diversity of wildlife including herds of wild red deer, rich lichen communities, rare fritillary butterflies, bats, and other species uncommon in southern Britain</i> GP1 emphasises enhancement as well as conservation, which picks up the key issue identified in the SA Scoping report on extending/restoring/recreating semi-natural habitats. GP1 requires development to ‘not adversely impact on the Vision and Objectives of the Exmoor National Park Partnership Plan and Local Plan’. This topic is covered by: <i>Vision statement - There is an increased extent of wildlife habitats in good condition and thriving populations of [valued] native plants and animals</i> <i>Objective - B1 to protect and enhance Exmoor’s wildlife and habitats and seek to improve the diversity, extent and condition of Exmoor’s important and valued habitats.</i> <i>Objective - B2 to maintain or increase the populations of native wildlife species on Exmoor that are valued for their</i></p>

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	<p><i>conservation status and local distinctiveness, and control and eradicate non-native species</i></p> <p>The Vision statement and Objectives pick up the key issues identified in the SA Scoping report of extending/restoring/recreating semi-natural habitats, and protecting important habitats and species. Green infrastructure is not specifically included in the Vision or Objectives, although the vision statement does refer to ‘recreational and green space’, and the references to extending habitats would support networks of green infrastructure.</p> <p>Score: ++</p> <p>The topic is covered by the National Park purposes, special qualities, Vision, and Objectives. It encourages enhancement as well as conservation of wildlife and habitats. The policy could be strengthened by referring to the ‘<i>natural beauty, wildlife and cultural heritage of the National Park</i>’. The Vision statement and Objectives could be strengthened by reference to ‘expanding and connecting’ habitats and creating networks of multi-functional green infrastructure.</p>
<p>Climate change and adaptation to flood risk</p>	<p>GP1 requires development to ‘not adversely impact on the Vision and Objectives of the Exmoor National Park Partnership Plan and Local Plan’. This topic is covered by:</p> <p>Vision statement - <i>we are closer to achieving a carbon-neutral National Park to help tackle climate change.</i></p> <p>Objective - <i>D3 To adapt to the anticipated effects of climate change on Exmoor’s communities, businesses, landscape, wildlife and coast including flood risk, sea level rise, unexpected weather events etc</i></p> <p>The vision statement picks up the key issues identified in the SA Scoping report of adapting to the impacts of climate change such as flood risk and water shortages.</p> <p>Score +</p> <p>The topic is covered by the Vision and Objectives, however the wording of the policy could be strengthened to positively support achievement of the Vision and Objectives, rather than just ‘not adversely impact’ on them.</p>
<p>Climate change mitigation and energy</p>	<p>GP1 requires development to ‘not adversely impact on the Vision and Objectives of the Exmoor National Park Partnership Plan and Local Plan’. This topic is covered by:</p> <p>Vision statement - <i>we are closer to achieving a carbon-neutral National Park to help tackle climate change.</i></p> <p>Objective - <i>D2 To minimise the net emissions of carbon dioxide and other greenhouse gases into the atmosphere in order to achieve a carbon neutral National Park and support measures which contribute to carbon neutrality in ways that both</i></p>

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	<p><i>conserve and enhance the National Park</i></p> <p>Objective - D4 <i>To support sensitively sited appropriately scale low carbon and renewable energy development which conserves Exmoor's landscape, wildlife and cultural heritage</i></p> <p>The vision statement picks up the key issues identified in the SA Scoping report of mitigation measures to reduce greenhouse gas emissions, encouraging renewable energy technologies, and improving the sustainability of Exmoor's communities.</p> <p>Score +</p> <p>The topic is covered by the Vision and Objectives, however the wording of the policy could be strengthened to positively support achievement of the Vision and Objectives, rather than just 'not adversely impact' on them</p>
<p>Community wellbeing (including equalities and health)</p>	<p>GP1 requires development to be consistent with the National Park's legal purposes and duty and to <i>promote opportunities for the understanding and enjoyment of the special qualities by the public; and, in doing so, foster the social and economic well-being of local communities.</i></p> <p>GP1 requires development to conserve and enhance the National Park and its special qualities. The special qualities relevant to this topic include:</p> <ul style="list-style-type: none"> - <i>A deeply rural community closely linked to the land with strong local traditions and ways of life</i> - <i>An exceptional rights of way network and extensive areas of open country, providing superb opportunities for walking, riding and cycling</i> - <i>A landscape that provides inspiration and enjoyment to visitors and residents alike</i> <p>GP1 requires development to 'not adversely impact on the Vision and Objectives of the Exmoor National Park Partnership Plan and Local Plan'. This topic is covered by:</p> <p>Vision statement - <i>Exmoor's communities retain a continuity of connection with the land; people have access to affordable services and facilities and There is increased public awareness and enjoyment of the National Park.</i></p> <p>Objective - H1 <i>To support Exmoor's communities and partnerships to plan development in their neighbourhoods to help meet their needs and aspirations while conserving the special qualities of the National Park</i></p> <p>Objective - H4 <i>To improve the sustainability, resilience and self-sufficiency_of the National Park's settlements by supporting the retention, provision of and access to community services and facilities</i></p> <p>Objective - F1 <i>To provide opportunities for people from all backgrounds and abilities, including/with a particular focus on young people and new audiences, to learn about and enjoy Exmoor National Park, leading to a greater understanding of Exmoor and its way of life</i></p>

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	<p>The Vision and Objectives pick up the issues identified in the SA Scoping report of improving the sustainability and inclusiveness of Exmoor’s communities, and access to services, facilities, recreational and green space.</p> <p>Score ++ The topic is covered by the National Park purposes, special qualities, Vision, and Objectives. It could be strengthened by reference to health and wellbeing in the Objectives.</p>
<p>Economy and employment</p>	<p>GP1 requires development to be consistent with the National Park’s legal purposes and duty and to <i>foster the social and economic well-being of local communities</i></p> <p>GP1 requires development to ‘not adversely impact on the Vision and Objectives of the Exmoor National Park Partnership Plan and Local Plan’. This topic is covered by: Vision statement - <i>there is a strong, diverse and sustainable economy that benefits from and contributes to the care and appreciation of Exmoor National Park.</i> Objective - <i>E1 To support actions that help achieve a strong, diverse, resilient and self-sufficient economy and encourage economic and employment opportunities which are consistent with National Park purposes.</i> Objective - <i>E2 To support measures that assist in the achievement of profitable and competitive farming, forestry and land management in ways that conserve and enhance the landscape, wildlife, cultural heritage and natural resources of the National Park whilst ensuring the viability of distinctive local breeds or livestock, producing food and making a major contribution to achieving a carbon-neutral National Park</i> Objective - <i>E3 To support the tourism industry in providing a warm welcome and high quality Exmoor experience for visitors and communities alike to discover Exmoor’s natural and historic environment, seek inspiration, enjoyment, tranquillity, wildness and to take part in active outdoor recreation and activities. This is supported by a range of sustainable accommodation, services and facilities.</i> Objective - <i>To achieve high quality broadband for all, telecommunications and essential utilities and infrastructure in ways commensurate with the conservation of the National Park’s natural beauty, landscape wildlife, cultural heritage and special qualities.</i></p> <p>The Vision and Objectives pick up the issues identified in the SA Scoping report of understanding the importance of Exmoor’s National park status and high environmental quality as a key economic driver, and creating a policy framework that encourages appropriate economic activities which benefit from and help to promote the National Park’s special qualities, and the need to respond to technological enhancements such as broadband.</p>

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	<p>Score ++ The topic is covered by the National Park purposes, special qualities, Vision, and Objectives</p>
Historic environment	<p>GP1 requires development to be consistent with the National Park’s legal purposes, which include the conservation and enhancement of natural beauty, wildlife and <i>cultural heritage</i>.</p> <p>GP1 requires development to conserve and enhance the National Park and its special qualities. One of the special qualities is <i>A complex and rich historic landscape that reflects how people have lived in, exploited and enjoyed Exmoor over the past 8000 years, including prehistoric landscapes and monuments such as burial mounds on ridges and discrete stone settings, ancient farmsteads and hamlets, picturesque villages and historic estates</i></p> <p>GP1 requires development to ‘not adversely impact on the Vision and Objectives of the Exmoor National Park Partnership Plan and Local Plan’. This topic is covered by: Vision statement - <i>There is an enhanced knowledge of the historic environment of Exmoor; increased awareness of the value of its cultural heritage, and the most important historical sites, settlements, buildings and features are conserved and their historical character retained</i> Objective - C1 <i>To ensure that the built tradition, character, distinctiveness and historic character of Exmoor’s settlements, buildings, farmsteads, landscapes, archaeological sites and monuments is conserved and enhanced and that the cultural heritage of Exmoor is protected through the careful management of development</i> Objective - C2 <i>To encourage new development to use local materials, sustainable building design and methods, in ways that contribute to the distinctive character and cultural heritage of Exmoor</i></p> <p>The Vision statement and Objectives pick up the issues identified in the SA Scoping report of conserving and retaining the historic character of Exmoor’s heritage assets, and promoting high quality, sustainable building methods and design.</p> <p>Score ++ The topic is covered by the National Park purposes, special qualities, Vision, and Objectives. The policy could be strengthened by referring to the <i>‘natural beauty, wildlife and cultural heritage of the National Park’</i></p>
Housing	<p>GP1 requires development to be consistent with the National Park’s legal purposes and duty and to <i>foster the social and economic well-being of local communities</i></p> <p>GP1 requires development to ‘not adversely impact on the Vision and Objectives of the Exmoor National Park Partnership</p>

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	<p>Plan and Local Plan'. This topic is covered by: Vision statement - <i>people have access to affordable services and facilities.</i> Objective - H1 <i>To support Exmoor's communities and partnerships to plan development in their neighbourhoods to help meet their needs and aspirations while conserving the special qualities of the National Park</i> Objective - H2 <i>To support communities and partnerships in addressing local and affordable housing needs for those with a strong connection through living or working in the National Park</i> Objective - H3 <i>To reduce the level of unmet local affordable housing need by making the best use of existing developed land and buildings, ensuring a mix of housing and a housing stock which helps sustain local communities</i></p> <p>The Vision statement and Objectives pick up the issues identified in the SA Scoping report of ensuring an adequate supply of housing to meet the needs of local communities, makes the best use of existing buildings and land, ensures that new housing does not impact on the National Park' special qualities.</p> <p>Score + The topic is covered by the National Park purposes, special qualities, Vision, and Objectives. It could be strengthened by specific reference to affordable housing in the vision.</p>
<p>Land (including agricultural, brownfield, contaminated land, waste and minerals)</p>	<p>GP1 requires development to 'not adversely impact on the Vision and Objectives of the Exmoor National Park Partnership Plan and Local Plan'. This topic is covered by: Vision statement - <i>Air, water and soil are unpolluted.</i> Objective - D1 <i>To conserve and enhance Exmoor's natural resources and to improve air and water quality, conserve water resources, ensure soils are in good condition, maximise carbon storage, and minimise pollution.</i> Objective - H3 <i>To reduce the level of unmet local affordable housing need by making the best use of existing developed land and buildings, ensuring a mix of housing and a housing stock which helps sustain local communities</i></p> <p>The Vision statement and Objectives pick up the issues identified in the SA Scoping report of making the best use of existing buildings and land, maintaining the quality of soils, and increasing recycling. Protecting the special qualities of the National Park from mineral extraction (except minor working for local building stone) is not specifically addressed, apart from reference in the vision statement to the provision of small scale stone quarries to supply local building materials</p> <p>Score + The topic is covered by the Vision and Objectives, however the wording of the policy could be strengthened to positively support achievement of the Vision and Objectives, rather than just 'not adversely impact' on them. The Objectives could also</p>

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	<p>be strengthened by reference to protecting the special qualities of the National Park from mineral extraction and supporting the supply of local building materials through small scale stone quarries.</p>
<p>Landscape</p>	<p>GP1 requires development to be consistent with the National Park’s legal purposes, which include the conservation and enhancement of <i>natural beauty</i>, wildlife and cultural heritage.</p> <p>GP1 requires development to conserve and enhance the National Park and its special qualities which include:</p> <ul style="list-style-type: none"> • <i>Large areas of open moorland providing a sense of remoteness, wildness and tranquillity rare in southern Britain</i> • <i>A distinct and diverse landscape of softly rounded hills and ridges, with heather and grass moors, spectacular coast, deeply incised wooded valleys, high sea cliffs, fast flowing streams, traditional upland farms and characteristic beech hedgebanks</i> • <i>A timeless landscape mostly free from intrusive development, with striking views inside and out of the National Park, and where the natural beauty of Exmoor and its dark skies can be appreciated</i> <p>GP1 requires development to ‘not adversely impact on the Vision and Objectives of the Exmoor National Park Partnership Plan and Local Plan’. This topic is covered by: Vision statement - <i>Exmoor’s distinct and diverse landscape is in good condition and there is an increased awareness of its importance</i> Objective - A1 <i>To conserve and enhance Exmoor’s landscapes as living working landscapes that remain predominately free from intrusive developments, structures and activities and maintain a sense of tranquillity and protect Exmoor’s dark skies</i> Objective - A2 <i>To ensure that Exmoor’s moorlands remain open, remote and relatively wild in character, that views are preserved and strategically important areas of former moor and heath are managed in a way that restores their wilder landscape character</i></p> <p>The Vision statement and Objectives pick up the issues identified in the SA Scoping report of keeping Exmoor wild, tranquil and remote, ensuring that changes in farming and land management practices do not detract from the special qualities and can continue to maintain Exmoor’s landscapes, and ensuring that Exmoor remains relatively free from intrusive development. Specific issues of equestrian activity and caravan/camp sites are not addressed in the General Policies but will be covered in more specific policies.</p> <p>Score ++ The topic is covered by the National Park purposes, special qualities, Vision, and Objectives. The policy could be strengthened by referring to the ‘<i>natural beauty, wildlife and cultural heritage of the National Park</i>’</p>

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<p>Coast</p>	<p>GP1 requires development to conserve and enhance the National Park and its special qualities which include:</p> <ul style="list-style-type: none"> • <i>A distinct and diverse landscape of softly rounded hills and ridges, with heather and grass moors, spectacular coast, deeply incised wooded valleys, high sea cliffs, fast flowing streams, traditional upland farms and characteristic beech hedgebanks</i> <p>GP1 requires development to ‘not adversely impact on the Vision and Objectives of the Exmoor National Park Partnership Plan and Local Plan’. This topic is covered by: Vision statement - <i>Exmoor’s distinct and diverse landscape is in good condition and there is an increased awareness of its importance. In 2030, Exmoor’s outstanding natural beauty with its mosaic of distinct and diverse landscapes and its dramatic coast has been safeguarded and enhanced</i> Objective - D3 <i>To adapt to the anticipated effects of climate change on Exmoor’s communities, businesses, landscape, wildlife and coast including flood risk, sea level rise, unexpected weather events etc.</i></p> <p>The Vision statement and Objectives pick up the issues identified in the SA Scoping report of mitigating against the impact of sea level rises and their impacts on coastal communities and habitats. The issue regarding potential impacts on landscape and the environment of energy generation on the coast or out of sea are not specifically referred to but are implicit in the policy to protect the special qualities of the National Park.</p> <p>Score + The topic is covered by the Vision and Objectives, however the wording of the policy could be strengthened to positively support achievement of the Vision and Objectives, rather than just ‘not adversely impact’ on them.</p>
<p>Transport</p>	<p>GP1 requires development to ‘not adversely impact on the Vision and Objectives of the Exmoor National Park Partnership Plan and Local Plan’. This topic is covered by: Objective - <i>To support sustainable transport for residents and visitors by improving public and community transport services and opportunities for walking, cycling and horse riding including linkages across the National Park boundary</i> Objective - G1 <i>To maintain and improve the recreational opportunities in the National Park particularly the rights of way network and access to open country and other quiet and active recreation and enjoyment based on Exmoor’s special qualities and ensure that opportunities for recreation can be enjoyed by people from all backgrounds and of all abilities</i></p> <p>The Objectives address the key issues identified in the SA Scoping report regarding encouraging sustainable transport, safeguarding public rights of way, supporting horse-riding, cycling and walking.</p>

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	<p>Score + The topic is covered by the Objectives, however the wording of the policy could be strengthened to positively support achievement of the Vision and Objectives, rather than just 'not adversely impact' on them. There is no reference to transport in the vision apart from access to services and facilities (although it is covered in the longer vision statement).</p>
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Appendix 3 – Sustainability Appraisal detailed assessment of General Policy 2

SA topics	General Policy 2 - Sustainable Development Management Principles
<p>Air quality and water resources</p>	<p>Policy GP2 identifies a set of principles to ensure that all development to conserves and enhances the National Park and contributes to sustainable development. The principles include:</p> <p style="text-align: center;">9) maintains the quality of natural resources including water and air and conserves soils</p> <p>Score ++</p>
<p>Biodiversity and Green Infrastructure</p>	<p>Policy GP2 identifies a set of principles to ensure that all development to conserves and enhances the National Park and contributes to sustainable development. The principles include:</p> <p style="text-align: center;">8) conserves and enhances the natural environment and conditions for biodiversity and geodiversity</p> <p>Score ++</p> <p>The policy could be strengthened by reference to green infrastructure</p>
<p>Climate change and adaptation to flood risk</p>	<p>Policy GP2 identifies a set of principles to ensure that all development to conserves and enhances the National Park and contributes to sustainable development. The principles include:</p> <p style="text-align: center;">10) adapts to and mitigates the impact of climate change, particularly in respect of carbon emissions, energy and water demand and flood risk</p> <p>Score ++</p>
<p>Climate change mitigation and energy</p>	<p>Policy GP2 identifies a set of principles to ensure that all development to conserves and enhances the National Park and contributes to sustainable development. The principles include:</p> <p style="text-align: center;">10) adapts to and mitigates the impact of climate change, particularly in respect of carbon emissions, energy and water demand and flood risk</p>

	<p>7) uses sustainable construction principles and minimises energy use and waste including taking account of the embodied energy of materials by appropriately re-using any materials from existing buildings or the site</p> <p>4) is acceptable in terms of access and traffic levels and which, where appropriate, enables the use of sustainable transport</p> <p>11) supports the socio-economic wellbeing of local communities and the National Park</p> <p>Score +</p> <p>The topic is covered in the principles, but could be strengthened by including a reference to the sustainability and resilience of settlements (including to climate change) in principle 2, to reflect Objective H4. Principle 11 could also be improved by expanding on what is meant by the socio-economic wellbeing of local communities.</p>
<p>Community wellbeing (including equalities and health)</p>	<p>Policy GP2 identifies a set of principles to ensure that all development to conserves and enhances the National Park and contributes to sustainable development. The principles include:</p> <p>11) supports the socio-economic wellbeing of local communities and the National Park</p> <p>12) considers the needs of future generations</p> <p>6) will not harm the amenities of visitors, local residents and occupiers of neighbouring properties</p> <p>Score+</p> <p>The topic is covered in the principles, but could be strengthened by including:</p> <ul style="list-style-type: none"> - reference to health in principle 11 - reference to services in principle 2 - reference to safe, attractive public spaces - reference to community participation in principle 11
<p>Economy and employment</p>	<p>Policy GP2 identifies a set of principles to ensure that all development to conserves and enhances the National Park and contributes to sustainable development. The principles include:</p> <p>3) makes efficient use of land, buildings, services and infrastructure and enables access to services and facilities, jobs and technology</p>

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	<p>Score+</p> <p>The topic is covered in the principles. There is no reference to key issues raised in the SA Scoping report such as the tourism and agricultural sectors, the importance of small businesses, local products and services, and local business suppliers, although it is questionable whether this level of detail could be covered by a generic set of principles. Principle 3 could be strengthened by reference to 'local' services, facilities and jobs.</p>
Historic environment	<p>Policy GP2 identifies a set of principles to ensure that all development to conserves and enhances the National Park and contributes to sustainable development. The principles include:</p> <p style="padding-left: 40px;">1) is of a scale, and in terms of its siting, use, layout, form, design, materials and intensity of activity respects and has a favourable impact on the character, local distinctiveness, appearance and historic and cultural features of the site and buildings, settlement ,landscape and setting</p> <p>score ++</p> <p>The topic is covered in this principle, although it is quite long and could be improved by splitting it. Principle 7 could be improved to include reference to local, traditional sustainable building materials.</p>
Housing	<p>Policy GP2 identifies a set of principles to ensure that all development to conserves and enhances the National Park and contributes to sustainable development. The principles include:</p> <p style="padding-left: 40px;">2) supports the function of individual settlements and their communities 11) supports the socio-economic wellbeing of local communities and the National Park. 12) considers the needs of future generations 3) makes efficient use of land, buildings, services and infrastructure and enables access to services and facilities, jobs and technology</p> <p>Score +</p> <p>The topic is covered implicitly in these principles, but there is no specific reference to housing or specific issues such as affordable housing, the type and mix of housing and so on.</p>

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<p>Land (including agricultural, brownfield, contaminated land, waste and minerals)</p>	<p>Policy GP2 identifies a set of principles to ensure that all development to conserves and enhances the National Park and contributes to sustainable development. The principles include:</p> <p style="padding-left: 40px;">7) uses sustainable construction principles and minimises energy use and waste including taking account of the embodied energy of materials by appropriately re-using any materials from existing buildings or the site</p> <p style="padding-left: 40px;">3) makes efficient use of land, buildings, services and infrastructure and enables access to services and facilities, jobs and technology</p> <p style="padding-left: 40px;">13) is acceptable in terms of ground conditions</p> <p style="padding-left: 40px;">9) maintains the quality of natural resources including water and air and conserves soils</p> <p>Score +</p> <p>The topic is covered by these principles. The principles could be strengthened by a reference to avoiding or reducing pollution, perhaps in principle 9.</p>
<p>Landscape</p>	<p>Policy GP2 identifies a set of principles to ensure that all development to conserves and enhances the National Park and contributes to sustainable development. The principles include:</p> <p style="padding-left: 40px;">1) is of a scale, and in terms of its siting, use, layout, form, design, materials and intensity of activity respects and has a favourable impact on the character, local distinctiveness, appearance and historic and cultural features of the site and buildings, settlement, landscape and setting</p> <p style="padding-left: 40px;">5) will conserve or enhance tranquillity including Exmoor’s dark sky and the quiet enjoyment of the National Park,</p> <p style="padding-left: 40px;">6) will not harm the amenities of visitors, local residents and occupiers of neighbouring properties</p> <p>Score +</p> <p>The topic is covered by these principles. Principle 1 is quite long and could be improved by splitting it.</p>
<p>Coast</p>	<p>Policy GP2 identifies a set of principles to ensure that all development to conserves and enhances the National Park and contributes to sustainable development. The principles include:</p> <p style="padding-left: 40px;">10) adapts to and mitigates the impact of climate change, particularly in respect of carbon emissions, energy</p>

	<p style="text-align: center;">and water demand and flood risk</p> <p>Score +</p> <p>The topic is covered in relation to flood risk. Principle 2 regarding the functions of settlements could include vulnerable coastal communities</p>
Transport	<p>Policy GP2 identifies a set of principles to ensure that all development to conserves and enhances the National Park and contributes to sustainable development. The principles include:</p> <p style="text-align: center;">4) is acceptable in terms of access and traffic levels and which, where appropriate, enables the use of sustainable transport</p> <p>score ++</p> <p>The topic is covered by these principles.</p>

Appendix 4 – Sustainability Appraisal detailed assessment of General Policy 3

SA topics	General Policy 3 – Major development
<p>Air quality and water resources</p>	<p>GP3 sets out the tests against which any proposals for major development would be considered.</p> <p>This topic would be covered by tests:</p> <p>(iii) 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.</p> <p>(iv) The cumulative impact of the development when viewed with other proposals and types of development.</p> <p>(vi) Where a proposal for major development can demonstrate a significant net benefit to the National Park, every effort to mitigate potential localised harm and compensate for any residual harm to the area would be expected to be secured</p> <p>The need to consider any potential impacts on air quality and water resources is implicit in test (iii) as part of ‘the environment’. Any cumulative impacts on air quality and water resources would need to be considered, and if the development was permitted, potential harm to air quality and water resources would need mitigation.</p> <p>Score +</p>
<p>Biodiversity and Green Infrastructure</p>	<p>GP3 sets out the tests against which any proposals for major development would be considered.</p> <p>The policy requires National Park purposes (including the conservation and enhancement the natural beauty, <i>wildlife</i> and cultural heritage of the National Park) to be secured.</p> <p>This topic would be covered by tests:</p> <p>(iii) 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.</p> <p>(iv) The cumulative impact of the development when viewed with other proposals and types of development</p> <p>(v) The scope for adequate restoration of the land once the use has ceased.</p> <p>(vi) Where a proposal for major development can demonstrate a significant net benefit to the National Park, every effort to mitigate potential localised harm and compensate for any residual harm to the area would be</p>

	<p style="text-align: center;">expected to be secured</p> <p>The need to consider any potential impacts on biodiversity is implicit in test (iii) as part of ‘the environment’ and specifically as one of the ‘special qualities’ of the National Park. Any cumulative impacts on biodiversity would need to be considered, and if the development was permitted, potential harm to biodiversity would need mitigation. Scope for restoration of the land once the use has ceased could provide opportunities for habitat creation.</p> <p>Score ++</p> <p>The policy could be strengthened by test (vi) including the avoidance of harm, before mitigation and compensation are sought.</p>
<p>Climate change and adaptation to flood risk</p>	<p>GP3 sets out the tests against which any proposals for major development would be considered.</p> <p>This topic would be covered by tests:</p> <p style="padding-left: 40px;">i) 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</p> <p style="padding-left: 40px;">(iv) The cumulative impact of the development when viewed with other proposals and types of development</p> <p style="padding-left: 40px;">(vi) Where a proposal for major development can demonstrate a significant net benefit to the National Park, every effort to mitigate potential localised harm and compensate for any residual harm to the area would be expected to be secured</p> <p>The need for the development would have to be considered against national policy relating to climate change adaptation. Flood risk would need to be considered including cumulative impacts, and if the development was allowed, any potential flood risk would need to be mitigated against for example through additional flood defences.</p> <p>Score ++</p> <p>The policy could be strengthened by test (vi) including the avoidance of harm, before mitigation and compensation are sought.</p>

<p>Climate change mitigation and energy</p>	<p>GP3 sets out the tests against which any proposals for major development would be considered.</p> <p>This topic would be covered by tests:</p> <p>i) 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</p> <p>The need for the development would have to be considered against national policy relating to climate change mitigation and the impact on local communities.</p> <p>score +</p>
<p>Community wellbeing (including equalities and health)</p>	<p>GP3 sets out the tests against which any proposals for major development would be considered.</p> <p>This topic would be covered by tests:</p> <p>i) 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</p> <p>(vi) Where a proposal for major development can demonstrate a significant net benefit to the National Park, every effort to mitigate potential localised harm and compensate for any residual harm to the area would be expected to be secured</p> <p>The need for the development would have to be considered against national policy and the impact on local communities. There may be benefits from the development for local communities in meeting their needs, for example in providing jobs or affordable housing. There would need to be mitigation or compensation for any harm if the development was permitted.</p> <p>score +</p> <p>The policy could be strengthened in relation to this topic by reference to the duty on National Park Authorities to foster the social and economic well-being of their communities.</p> <p>The policy could be strengthened by test (vi) including the avoidance of harm, before mitigation and compensation are sought.</p>

<p>Economy and employment</p>	<p>GP3 sets out the tests against which any proposals for major development would be considered.</p> <p>This topic would be covered by tests:</p> <p>i) 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</p> <p>There could be benefits to the economy from major development in terms of jobs. However, any major development that impacted on the natural beauty or amenity of the National Park could be a detriment to the economy, particularly tourism.</p> <p>score +/-</p> <p>The policy could be strengthened in relation to this topic by reference to the duty on National Park Authorities to foster the social and economic well-being of their communities</p>
<p>Historic environment</p>	<p>GP3 sets out the tests against which any proposals for major development would be considered.</p> <p>The policy requires National Park purposes (including the conservation and enhancement the natural beauty, wildlife and <i>cultural heritage</i> of the National Park) to be secured.</p> <p>This topic would be covered by tests:</p> <p>(iii) 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.</p> <p>(iv) The cumulative impact of the development when viewed with other proposals and types of development</p> <p>(vi) Where a proposal for major development can demonstrate a significant net benefit to the National Park, every effort to mitigate potential localised harm and compensate for any residual harm to the area would be expected to be secured</p> <p>The need to consider any potential impacts on the historic environment is implicit in test (iii) as part of ‘the environment’ and specifically as one of the ‘special qualities’ of the National Park. The cumulative impact of the development on the historic environment, for example within a Conservation Area, would need to be considered. If the development was permitted, potential harm to the historic environment would need mitigation, for example through archaeological record.</p>

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	<p>Score ++</p> <p>The policy could be strengthened by test (vi) including the avoidance of harm, before mitigation and compensation are sought, for example preservation in situ of archaeological remains.</p>
<p>Housing</p>	<p>GP3 sets out the tests against which any proposals for major development would be considered.</p> <p>This topic would be covered by tests:</p> <p>i) 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</p> <p>The need for the development would have to be considered against the impact on local communities. There may be benefits from the development for local communities in meeting their needs, for example in providing affordable housing. The rigorous tests set out in this policy could discourage delivery of affordable housing. There would need to be mitigation or compensation for any harm if the development was permitted.</p> <p>Major development needs definition in the National Park context. Currently it would include proposals for more than 10 houses (small scale major housing of 10-100 houses)</p> <p>Score +/-</p> <p>The policy could be strengthened in relation to this topic by reference to the duty on National Park Authorities to foster the social and economic well-being of their communities.</p> <p>The policy could be strengthened in relation to this topic by addition of reference in test (vi) to Where a proposal for major development can demonstrate a significant net benefit to the National Park and its local communities</p>
<p>Land (including agricultural, brownfield, contaminated land, waste and minerals)</p>	<p>GP3 sets out the tests against which any proposals for major development would be considered.</p> <p>This topic would be covered by tests:</p> <p>(iii) any detrimental effect on the environment, the landscape, the National Park's special qualities and</p>

	<p>recreational opportunities, and the extent to which that could be moderated.</p> <p>(iv) The cumulative impact of the development when viewed with other proposals and types of development.</p> <p>(v) The scope for adequate restoration of the land once the use has ceased.</p> <p>(vi) Where a proposal for major development can demonstrate a significant net benefit to the National Park, every effort to mitigate potential localised harm and compensate for any residual harm to the area would be expected to be secured</p> <p>The need to consider any potential impacts on land is implicit in test (iii) as part of ‘the environment’. Any cumulative impacts on land would need to be considered, and if the development was permitted, potential harm to land would need mitigation. The land would have to be restored once the use has ceased.</p> <p>Score ++</p>
<p>Landscape</p>	<p>GP3 sets out the tests against which any proposals for major development would be considered. The policy requires National Park purposes (including the conservation and enhancement the <i>natural beauty</i>, wildlife and cultural heritage of the National Park) to be secured.</p> <p>This topic would be covered by tests:</p> <p>(iii) 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.</p> <p>(iv) The cumulative impact of the development when viewed with other proposals and types of development</p> <p>(v) The scope for adequate restoration of the land once the use has ceased.</p> <p>(vi) Where a proposal for major development can demonstrate a significant net benefit to the National Park, every effort to mitigate potential localised harm and compensate for any residual harm to the area would be expected to be secured</p> <p>The need to consider any potential impacts on landscape is implicit in test (iii) as part of ‘the environment’ and specifically as one of the ‘special qualities’ of the National Park. Any cumulative impacts on landscape would need to be considered, and if the development was permitted, potential harm to landscape would need mitigation. Scope for restoration of the land once the use has ceased could provide opportunities for landscape enhancement.</p> <p>Score ++</p>

	<p>The policy could be strengthened by test (vi) including the avoidance of harm, before mitigation and compensation are sought.</p>
<p>Coast</p>	<p>GP3 sets out the tests against which any proposals for major development would be considered.</p> <p>This topic would be covered by tests:</p> <p style="text-align: center;">(iii) 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.</p> <p>This policy is not strong in terms of coverage of the coast, relying on the coast being implicit as part of ‘the environment’, or reference in the special qualities. The unsuitability of coastal areas for major development for example due to sea level rise or topography is not captured, however it would be covered by other policies.</p> <p>Score +</p>
<p>Transport</p>	<p>GP3 sets out the tests against which any proposals for major development would be considered.</p> <p>This topic would be covered by tests:</p> <p style="text-align: center;">(iv) The cumulative impact of the development when viewed with other proposals and types of development (vi) Where a proposal for major development can demonstrate a significant net benefit to the National Park, every effort to mitigate potential localised harm and compensate for any residual harm to the area would be expected to be secured</p> <p>The impact of major development on this topic would need to be considered as part of test (iv) for example in relation to the cumulative impact of traffic and congestion or greenhouse gas emissions. If the development was permitted, potential impacts from increased transport would need mitigation.</p> <p>Score +</p>

Appendix 5 – Housing Option 1 – 100% affordable housing to meet local needs

SA topics	Pros	Cons	Score
Air quality and water resources	Likely to be limited house building so little impact on air quality or water resources		+
Biodiversity and Green Infrastructure	Likely to be limited house building so little impact on biodiversity – will depend on location	Limited opportunities for biodiversity enhancement or GI	++
Climate change and adaptation to flood risk	Likely to be limited house building so little impact. Making best use of the limited land capacity, so less likely to have to build in areas at risk of flooding	In situations such as Porlock Weir where communities are at risk of flooding, restricting new build to affordable needs only could prevent families from relocating.	+/-
Climate change mitigation and energy	Currently registered providers (Housing Associations) are required to build to higher standards of sustainable construction through the Code for Sustainable Homes (if grant funded).	The requirement to build to Code Level 3 has increased the cost and could affect viability (although some recent evidence from Government suggests that costs are declining)	+/-
Community wellbeing (including equalities and health)	Positive in focusing provision only on meeting the demonstrated need for affordable housing in communities. Restricting provision to local people helps maintain strength of community and supports retention of services	Could restrict opportunities for other housing needs to be met, e.g for older people wishing to downsize or families requiring larger houses	+/-
Economy and employment	Targeting provision at local people helps provide housing for people working locally who could not otherwise afford to live near to where they work.	Likely to be limited new houses built which will restrict local employment in construction. Could affect businesses who struggle to recruit workers who are not in affordable housing need.	+/-

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		Affordable housing tends to be restricted in size and therefore may not be suitable for enabling home working/flexible working.	
Historic environment	Likely to be limited house building so little impact on historic environment – will depend on location/setting	Limited opportunities for conservation enhancement	++
Housing	This approach applies to single new homes e.g. for self builds as well as a number of houses on a site. Requiring all new housing to be for local affordable needs ensures that land values remain lower and more affordable so enabling housing associations and individuals to acquire land specifically for affordable housing.	In the foreseeable future, delivery of affordable housing is likely to be very limited or potentially halted if housing grant remains at current levels due to reductions in Government housing grant - although grant levels may change over the lifetime of the plan. Could restrict opportunities for other housing needs to be met, e.g for older people wishing to downsize or families requiring larger houses. Also a question over whether the specific needs of agricultural and forestry workers would still be met under this option.	+/-
Land (including agricultural, brownfield, contaminated land, waste and minerals)	Ensures that the limited suitable land is only used for the most needed (affordable) housing. The requirement to build to affordable homes to higher levels of sustainable construction could support greater use of recycled materials, local building materials reduced waste etc.	May not be able to re-use certain sites particularly contaminated land (& therefore improve them by removing contamination) due to the impact on viability.	+
Landscape	Ensures that the limited supply of suitable land is only used for the most needed (affordable) housing, thereby minimizing overall impacts on landscape character (as overall levels of house building will be limited)		++
Coast	Less development pressures and therefore less likely to have pressure to build on vulnerable coastal areas	In situations such as Porlock Weir where communities are at risk of flooding, restricting new build to affordable needs only could prevent families from relocating	+/-

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Transport	Likely to be restricted levels of new house building so will create less traffic and emissions.	<p>Lack of available suitable housing for workers could lead to increased commuting.</p> <p>Limited numbers of houses being built could restrict opportunities (due to limited finance) for transport enhancements such as opportunities for walking, cycling etc.</p>	+/-

Appendix 6 Housing Option 2 – affordable housing to address local affordable need with some local market housing

	Pros	Cons	Score
SA topics			
Air quality and water resources	There is likely to be more housing built under this option than option 1. However there is still likely to be limited impact on air quality or water resources		+
Biodiversity and Green Infrastructure		Limited opportunities for biodiversity enhancement or GI. Local market housing will generate less value from a site and so contributions are likely to be prioritised on affordable housing provision with no or limited finance available for other enhancements. Likely to be more pressure on the limited supply of land, so could lead to increased likelihood of detrimental impact on biodiversity	-
Climate change and adaptation to flood risk		Likely to be more pressure on the limited supply of land, so could lead to increased likelihood of having to build in areas at risk of flooding	-
Climate change mitigation and energy	Currently registered providers (Housing Associations) are required to build to higher standards of sustainable construction through the Code for Sustainable Homes (if grant funded).	The requirement to build to Code Level 3 has increased the cost and could affect viability (although some recent evidence from Government suggests that costs are declining) There will be an overall higher level of housing and consequently greenhouse gas emissions could be higher.	+/-
Community wellbeing	Allows for new local need affordable homes and other new build non-affordable local housing such as older		++

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(including equalities and health)	<p>people wishing to downsize or families requiring larger houses.</p> <p>Evidence indicates that local housing could help provide contributions to help deliver affordable homes for local communities.</p>		
Economy and employment	<p>Targeting provision at local people helps provide housing for people working locally who could not otherwise afford to live near to where they work.</p> <p>Could allow additional new houses to be built which could support more local employment in construction.</p> <p>Could help businesses who struggle to recruit workers who are not in affordable housing need.</p> <p>May enable some housing stock to be larger which would be more suitable for home working/flexible working</p>		++
Historic environment	<p>There is likely to be a low level of overall housing built under this option (although slightly more than option 1). Consequently there is likely to be limited impact on the historic environment – although this will depend on largely on location and level of overall need.</p>	<p>Limited opportunities for conservation enhancement. Local market housing will generate less value from a site and so contributions are likely to be prioritised on affordable housing provision with no or limited finance available for other enhancements.</p> <p>Likely to be more pressure on the limited supply of land, so could lead to increased likelihood of detrimental impact on historic environment</p>	+/-
Housing	<p>Allows for new local need affordable homes and other new build non-affordable local housing such as older people wishing to downsize or families requiring larger</p>		++

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	<p>houses.</p> <p>Evidence indicates that local housing could help provide contributions to help deliver affordable homes for local communities</p> <p>A local tie would be likely to reduce the value compared to an open market home, keeping the housing more affordable for local people.</p>		
Land (including agricultural, brownfield, contaminated land, waste and minerals)		<p>Allowing for new local (non affordable) housing to cross subsidise affordable housing would require more housing in a development and therefore more housing in total and so use up more of the limited sites/land suitable for housing in the National Park</p> <p>This option may not raise sufficient finance to enable contaminated land to be improved</p>	-- --
Landscape	<p>Could enable redevelopment of eyesores and improve settlement character.</p>	<p>Allowing for new local (non affordable) housing to cross subsidise affordable housing would require more housing in a development and therefore more housing in total and so use up more of the limited sites/land suitable for housing in the National Park with greater potential impact on landscape character.</p>	-- --
Coast	<p>In situations where communities are at risk of flooding, allowing some local market housing could provide opportunities for relocation</p>	<p>Likely to be more pressure on the limited supply of land, so could lead to increased likelihood of having to build in vulnerable coastal areas</p>	+/-
Transport	<p>This option may provide additional suitable housing for workers and reduce the need for commuting.</p>	<p>This option is likely to result in more housing overall and so will create more traffic and emissions.</p>	+/-

Appendix 7 Housing Option 3 – affordable housing to address local affordable need with some local market housing and open market housing

	Pros	Cons	Score
SA topics			
Air quality and water resources	There is likely to be more housing built under this option than option 1. However there is still likely to be limited impact on air quality or water resources		+
Biodiversity and Green Infrastructure	This option could provide more opportunities for biodiversity enhancement or GI due to the increased value from open market housing.	Likely to be more pressure on the limited supply of land, so could lead to increased likelihood of detrimental impact on biodiversity	+/-
Climate change and adaptation to flood risk	This option could provide more opportunities for flood defences due to the increased value from open market housing	Likely to be more pressure on the limited supply of land, so could lead to increased likelihood of having to build in areas at risk of flooding	+/-
Climate change mitigation and energy	<p>Currently registered providers (Housing Associations) are required to build to higher standards of sustainable construction through the Code for Sustainable Homes (if grant funded).</p> <p>The viability of sites is less likely to be affected by the requirement to build to Code Level 3 due to the higher value of open market sites</p>	<p>There will be an overall higher level of housing and consequently greenhouse gas emissions could be higher, although this could be mitigated by building to higher standards of sustainable construction.</p> <p>The viability of sites may be affected by the requirement to build to Code Level 3 due to the lower value of local market sites</p>	+/-
Community wellbeing (including equalities and	Evidence indicates that local and open market housing can provide contributions to help fund affordable homes for local communities	<p>Open market housing would cater for demand but not necessarily need and would not have a local tie.</p> <p>Open market housing could lead to additional second</p>	+

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health)	<p>Allows for new local need affordable homes and other new build non-affordable local housing such as older people wishing to downsize or families requiring larger houses.</p> <p>Open market housing could provide additional contributions to deliver community infrastructure.</p>	<p>homes that do not necessarily maintain strength of community and support retention of services</p>	
Economy and employment	<p>Targeting provision at local people helps provide housing for people working locally who could not otherwise afford to live near to where they work.</p> <p>Could allow additional new houses to be built which could support more local employment in construction.</p> <p>Could help businesses who struggle to recruit workers who are not in affordable housing need.</p> <p>May enable some housing stock to be larger which would be more suitable for home working/flexible working</p>	<p>Evidence suggests open market housing would lead to increased in-migration by retired people who would not be economically active.</p>	+
Historic environment	<p>This option could provide more opportunities for historic environment enhancement due to the increased value from open market housing.</p>	<p>Likely to be more pressure on the limited supply of land, so could lead to increased likelihood of detrimental impact on historic environment</p>	+/-
Housing	<p>Evidence indicates that local market and open market housing can provide contributions to help deliver affordable homes for local communities.</p> <p>Allows for new local need affordable homes and other new build non-affordable local housing such as older people wishing to downsize or families requiring larger</p>	<p>Open market housing would cater for demand but not necessarily need and would not have a local tie, therefore the housing is less likely to be affordable for local people.</p>	+

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	houses. A locally tied home would be likely to reduce the value compared to an open market home.		
Land (including agricultural, brownfield, contaminated land, waste and minerals)	This option may raise sufficient finance to enable contaminated land to be improved The requirement to build to affordable homes to higher levels of sustainable construction could support greater use of recycled materials, local building materials reduced waste etc.	Allowing for new local (non affordable) housing and open market housing to cross subsidise affordable housing would require more housing in a development and therefore more housing in total and so use up more of the limited sites/land suitable for housing in the National Park. Market housing would cater for demand but not necessarily need	-
Landscape	Could enable redevelopment of eyesores and improve settlement character. This option may provide limited opportunities for landscape enhancement (although less than option 4) due to the increased value from open market housing.	Allowing for new local and open market housing to cross subsidise affordable housing would require more housing in a development and therefore more housing in total and so use up more of the limited sites/land suitable for housing in the National Park with greater potential impact on landscape character.	-
Coast	In situations where communities are at risk of flooding, allowing some local and open market housing could provide more flexible opportunities for relocation	Likely to be more pressure on the limited supply of land, so could lead to increased likelihood of having to build in vulnerable coastal areas	+/-
Transport	This option may provide additional suitable housing for workers and reduce the need for commuting. This option could generate additional finance which may enable transport enhancements such as opportunities for walking, cycling etc	This option is likely to result in more housing overall and so will create more traffic and emissions.	+/-

Appendix 8 Housing Option 4 – affordable housing to address local affordable needs with some open market housing

SA topics	Pros	Cons	Score
Air quality and water resources	There is likely to be more housing built under this option than option 1. However there is still likely to be limited impact on air quality or water resources		+
Biodiversity and Green Infrastructure	This option could provide more opportunities for biodiversity enhancement or GI due to the increased value from open market housing.	Likely to be more pressure on the limited supply of land, so could lead to increased likelihood of detrimental impact on biodiversity	+/-
Climate change and adaptation to flood risk	This option could provide more opportunities for flood defences due to the increased value from open market housing	Likely to be more pressure on the limited supply of land, so could lead to increased likelihood of having to build in areas at risk of flooding	+/-
Climate change mitigation and energy	<p>Currently registered providers (Housing Associations) are required to build to higher standards of sustainable construction through the Code for Sustainable Homes (if grant funded).</p> <p>The viability of sites is less likely to be affected by the requirement to build to Code Level 3 due to the higher value of open market sites</p>	There will be an overall higher level of housing and consequently greenhouse gas emissions could be higher, although this could be mitigated by building to higher standards of sustainable construction.	+
Community wellbeing (including equalities and	Evidence indicates that open market housing can provide contributions to help fund affordable homes for local communities	<p>Open market housing would cater for demand but not necessarily need and would not have a local tie.</p> <p>Open market housing could lead to additional second</p>	+/-

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health)	Open market housing could provide additional contributions to deliver community infrastructure.	homes that do not necessarily maintain strength of community and support retention of services	
Economy and employment	<p>Could allow additional new houses to be built which could support more local employment in construction.</p> <p>Could help businesses who struggle to recruit workers who are not in affordable housing need.</p> <p>May enable some housing stock to be larger which would be more suitable for home working/flexible working</p>	Evidence suggests open market housing would lead to increased in-migration by retired people who would not be economically active.	+/-
Historic environment	This option could provide more opportunities for historic environment enhancement due to the increased value from open market housing.	Likely to be more pressure on the limited supply of land, so could lead to increased likelihood of detrimental impact on historic environment	+/-
Housing	Evidence indicates that open market housing can provide contributions to help fund affordable homes for local communities.	Open market housing would cater for demand but not necessarily need and would not have a local tie, therefore the housing is less likely to be affordable for local people.	+/-
Land (including agricultural, brownfield, contaminated land, waste and minerals)	<p>This option may raise sufficient finance to enable contaminated land to be improved</p> <p>The requirement to build to affordable homes to higher levels of sustainable construction could support greater use of recycled materials, local building materials reduced waste etc.</p>	Allowing for open market housing to cross subsidise affordable housing would require more housing in a development and therefore more housing in total and so use up more of the limited sites/land suitable for housing in the National Park.	+/-
Landscape	Could enable redevelopment of eyesores and improve settlement character.	Allowing for new open market housing to cross subsidise affordable housing would require more housing in a development and therefore more housing	+/-

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	This option could provide more opportunities for landscape enhancement due to the increased value from open market housing.	in total and so use up more of the limited sites/land suitable for housing in the National Park with greater potential impact on landscape character.	
Coast	In situations where communities are at risk of flooding, allowing some open market housing could provide more flexible opportunities for relocation	Likely to be more pressure on the limited supply of land, so could lead to increased likelihood of having to build in vulnerable coastal areas	+/-
Transport	This option may provide additional suitable housing for workers and reduce the need for commuting. This option could generate additional finance which may enable transport enhancements such as opportunities for walking, cycling etc	This option is likely to result in more housing overall and so will create more traffic and emissions.	+/-

Appendix 9 Settlement Hierarchy Option A – all settlements listed in existing Local Plan.

These currently include Dulverton, Lynton and Lynmouth, Porlock, Allerford, Barbrook, Bridgetown, Brendon, Challacombe, Cutcombe, Dunster, Exford, Exton, Luccombe, Luxborough, Monksilver, Parracombe, Roadwater, Simonsbath, Timberscombe, Winsford, Withypool, Wheddon Cross, Wootton Courtney.

SA topics	Pros	Cons	Score
Air quality and water resources	<p>The main impacts on air quality and water resources in the National Park are external, as identified in the SA Scoping Report.</p> <p>Likely to be limited house building so little impact on air quality or water resources</p>	<p>Some settlements do not have mains water and any additional new build would have to rely on private supplies</p>	+
Biodiversity and Green Infrastructure	<p>Focusing new build in the listed settlements reduces the impact on biodiversity in the wider countryside.</p> <p>Focusing new build in the listed settlements provides potential opportunities to enhance green infrastructure networks within those settlements and out into the wider countryside.</p>	<p>Although all development would be subject to safeguards in policies, proposals would have the potential to impact on the biodiversity and green infrastructure of the listed settlements</p>	+
Climate change and adaptation to flood risk		<p>Although all development would be subject to safeguards in policies, the current list includes settlements that are vulnerable to sea level rise and flood risk. Levels of development will be dependent on the capacity of the settlement and available suitable land.</p>	-
Climate change mitigation and energy	<p>Focusing new build development in the listed settlements where jobs and services are located will reduce the need to travel and therefore reduce greenhouse gas emissions.</p>		+

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Community wellbeing (including equalities and health)	Allows development in a range of communities, which could meet the requirements of those communities. Could increase support for local services in the listed settlements Could strengthen the community in the listed settlement.	Restricting new development only to those settlements listed may mean that the housing / development needs of other communities may not be met.	+/-
Economy and employment	Allows employment development in a range of communities, which could meet the requirements of local businesses and provide jobs.	Restricting new development only to those settlements listed may mean that the employment development needs in other settlements may not be met.	+/-
Historic environment	There may be some opportunities for enhancement of heritage assets	Although all development would be subject to safeguards in policies, proposals would have the potential to impact on the character of the listed settlements. Allerford, Luccombe, Dunster, Dulverton, Lynton and Lynmouth, Paracombe, Porlock and Wootton Courtney are all Conservation Areas.	-
Housing	Could enable housing need to be addressed in a range of communities, helping to meet local affordable need where the need arises.	Housing needs through new build would not be addressed in other smaller settlements (though reuse of buildings for local needs affordable housing could be allowed for) New build development would only be allowed in other smaller settlements aside from permitted development rights and in very specific circumstances such as for agriculture or forestry or for farm shops/diversification for example.	+/-
Land (including agricultural, brownfield, contaminated land, waste and minerals)	Focusing new development on the listed settlements makes use of the existing stock of accommodation, buildings and brownfield land to reduce the need for greenfield development. Landscape capacity studies have shown that there are	There could be some loss of the best and most versatile agricultural land around those listed settlements on the eastern edge of the National Park.	+

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	suitable and potential sites within the listed settlements to accommodate small scale development.		
Landscape	Restricting new development to listed settlements protects the landscape character of the rest of the National Park. Landscape capacity studies have shown that there are suitable and potential sites within the listed settlements to accommodate small scale development.	Although all development would be subject to safeguards in policies, proposals would have the potential to impact on landscape, open space and the character of the listed settlements.	+
Coast		Although all development would be subject to safeguards in policies, the current list includes settlements that are vulnerable to sea level rise and flood risk. Levels of development will be dependent on the capacity of the settlement and available suitable land.	-
Transport	Focusing new build development in existing settlements where jobs and services are located will reduce the need to travel and therefore reduce greenhouse gas emissions.	Focusing new build development in existing settlements could increase traffic and congestion within those settlements.	+/-

Appendix 10 Settlement Hierarchy Option B – development only in those towns and villages where there is a school, a regular bus service which runs 5+ times a week and a shop.

This would currently include the following settlements: *Cutcombe/Wheddon Cross, Dulverton, Dunster, Exford, Lynton and Lynmouth, Parracombe, Porlock and Timberscombe*

SA topics	Pros	Cons	Score
Air quality and water resources		Some evidence that air quality in larger settlements may be being affected by increase in particulates from burning oil and wood fuel (the main sources of heat due to lack of mains gas within Exmoor). This could be exacerbated by concentrating all new build within the listed settlements.	-
Biodiversity and Green Infrastructure	Focusing new build in a restricted number of settlements reduces the impact on biodiversity in the wider countryside.	Although all development would be subject to safeguards in policies, proposals would have the potential to impact on the biodiversity and green infrastructure of the listed settlements. The concentration of new development in a smaller number of settlements could have potential impacts on protected species such as bats and otters.	+/-
Climate change and adaptation to flood risk		Although all development would be subject to safeguards in policies, the list includes settlements that are vulnerable to sea level rise and flood risk. These risks are likely to be exacerbated due to concentration of development, limited capacity of the settlement and available suitable land.	-
Climate change mitigation and energy	Focusing new build development in the listed settlements where jobs and services are located will reduce the need to travel and therefore reduce greenhouse gas emissions.		+

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Community wellbeing (including equalities and health)	New development could support local services in the listed settlements New development could strengthen the community in the listed settlements	Restricting new development only to a smaller number of listed settlements may mean that the housing / development needs of other communities may not be met.	+/-
Economy and employment	Allows employment development in the listed settlements, which could meet the requirements of local businesses and provide jobs.	Restricting new development only to those settlements listed may mean that the employment development needs in other settlements may not be met.	+/-
Historic environment	Restricting new development to a smaller number of listed settlements protects the historic environment of the rest of the National Park.	Although all development would be subject to safeguards in policies, proposals would have the potential to impact on the character of the listed settlements. These impacts could be greater due to the concentration of development in a smaller number of settlements. Dunster, Dulverton, Lynton and Lynmouth, Paracombe and Porlock are all Conservation Areas.	+/-
Housing	Would still be focused on meeting affordable housing need.	Housing needs through new build would not be addressed in other (smaller) settlements (though reuse of buildings for local needs affordable housing could be allowed for) New build development would only be allowed in other settlements aside from permitted development rights and in very specific circumstances such as for agriculture or forestry or for farm shops/diversification for example Overall levels of affordable housing need may not be provided for due to the lack of sufficient suitable and potential land within the smaller number of settlements listed (due to landscape capacity and other restrictions).	-

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Land (including agricultural, brownfield, contaminated land, waste and minerals)		Would limit the availability of land available for new development	-
Landscape	Restricting new development to a smaller number of listed settlements protects the landscape character of the rest of the National Park.	Although all development would be subject to safeguards in policies, proposals would have the potential to impact on landscape, open space and the character of the listed settlements. Landscape capacity studies have shown that there may not be sufficient suitable and potential sites within the smaller number of listed settlements to provide for identified housing need.	+/-
Coast		Although all development would be subject to safeguards in policies, the current list includes settlements (Lynmouth) that are vulnerable to sea level rise and flood risk. Levels of development will be dependent on the capacity of the settlement and available suitable land.	-
Transport	Focusing new build development in the listed settlements where jobs and services are located will reduce the need to travel and therefore reduce greenhouse gas emissions.	Focusing new build development in existing settlements could increase traffic and congestion within those settlements.	+/-

Appendix 11 Settlement Hierarchy Option C – all settlements listed in existing Local Plan AND settlements with a shop and/or pub and/or village hall

Potential additional settlements with a shop and/or pub and/or village hall could include Hawkridge, Twitchen, Heasley Mill, Kentisbury/Kentisbury Town, Trentishoe, Martinhoe, Countisbury, Rockford, Oare, Porlock Weir, West Porlock, Bossington, Selworthy, Withycombe, Nettlecombe, Elworthy

SA topics	Pros	Cons	Score
Air quality and water resources	The main impacts on air quality and water resources in the National Park are external, as identified in the SA Scoping Report. Likely to be limited house building so little impact on air quality or water resources.	Some settlements do not have mains water and any additional new build would have to rely on private supplies	+/-
Biodiversity and Green Infrastructure	Focusing new build in the listed settlements provides potential opportunities to enhance green infrastructure networks within those settlements and out into the wider countryside	It would be likely to increase both the range of settlements and the amount of new build development allowed for within the National Park and although any development would be subject to safeguards in policies, proposals would have the potential to impact on the biodiversity and green infrastructure of the listed settlements and any other additional settlements identified.	+/-
Climate change and adaptation to flood risk	The inclusion of settlements such as Porlock Weir, where communities are at risk of flooding, could enable the relocation of existing development.	Although all development would be subject to safeguards in policies, the current list includes settlements that are vulnerable to sea level rise and flood risk. Levels of development will be dependent on the capacity of the settlement and available suitable land. The additional settlements include Porlock Weir, Heasley Mill, Rockford, Bossington which are all vulnerable to flood risk.	+/-

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Climate change mitigation and energy		The inclusion of a wider range of settlements could increase the need to travel for jobs and services and therefore increase greenhouse gas emissions.	-
Community wellbeing (including equalities and health)	Would allow for development in a wider range of communities, which could meet the needs of those communities. Could increase support for local services in the chosen settlements Could strengthen the community in the chosen settlements		++
Economy and employment	Allows employment development in a wider range of communities, which could meet the requirements of local businesses and provide jobs.		++
Historic environment	Allowing development within additional settlements could enable conservation enhancements such as bringing listed or historic buildings back into use.	It would be likely to increase both the range of settlements and the amount of new build development allowed for within the National Park and although any development would be subject to safeguards in policies, proposals would have the potential to impact on the character of the listed settlements. The additional settlements include Porlock Weir, Bossington and Selworthy, which are all Conservation Areas.	+/-
Housing	Could enable housing needs in the additional settlements to be addressed through new build housing as well as through the reuse of existing buildings Would allow for new build housing in a wider range of communities, which could meet the needs of those communities		++

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Land (including agricultural, brownfield, contaminated land, waste and minerals)	Could potentially increase the land available for new development	There could be some loss of the best and most versatile agricultural land around those listed settlements on the eastern edge of the National Park. The additional list of settlements include Bossington, Selworthy Nettlecombe and Elworthy within this area.	+
Landscape		It would be likely to increase both the range of settlements and the amount of new build development allowed for within the National Park and although any development would be subject to safeguards in policies, proposals would have the potential to impact on landscape, open space and the character of the listed settlements and any additional settlements identified. Landscape capacity studies would need to be undertaken of any additional settlements included in the LDF.	-
Coast	The inclusion of settlements such as Porlock Weir, where communities are at risk of flooding, could enable the relocation of existing development. This could be achieved by designating Coastal Change Management Areas.	Although all development would be subject to safeguards in policies, the current list includes settlements that are vulnerable to sea level rise and flood risk. Levels of development will be dependent on the capacity of the settlement and available suitable land. The additional settlements include Porlock Weir and Bossington which are vulnerable coastal areas.	+/-
Transport		The inclusion of a wider range of settlements could increase the need to travel for jobs and services and therefore increase greenhouse gas emissions.	-

Appendix 12 Overview of the Services & Facilities in Exmoor's Main Settlements

The table below is an extract from the Exmoor National Park Settlement Analysis Report 2011 which provides an overview of the services and facilities in the settlements listed in the current Local Plan. A Landscape Capacity Study is also being carried out.

Settlement	Bus (days per week)	Daily bus >5 X a day	Community Transport	Primary / First School	Middle School	Place of Worship	Village/Town Hall	Post Office**	Convenience Store	Public House	Petrol Filling Station	Police Station	Fire Station	Doctors Surgery	Dentist Surgery	Sports Recreation Area	Children's Play Area	Public Toilets	Public Car Park	Library	Mobile Library	Bank	Information Centre	IT Centre/Facility	Recycling Facility
Allerford	6	✓	✓				✓	✓	✓	✓						✓	✓	✓	✓						✓
Barbrook	6	✓	✓			✓	✓		✓		✓														
Brendon	0					✓	✓			✓						✓	✓	✓	✓						
Bridgetown / Exton	6	✓				✓	✓			✓						✓									
Brompton Regis	1		✓			✓	✓	✓	✓	✓						✓	✓				✓				✓
Challacombe	0					✓		✓	✓	✓											✓				
Cutcombe / Wheddon Cross	6	✓		✓		✓	✓	✓	✓	✓	✓					✓	✓	✓	✓		✓				
Dulverton	6	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓

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Settlement	Bus (days per week)	Daily bus >5 X a day	Community Transport	Primary / First School	Middle School	Place of Worship	Village/Town Hall	Post Office**	Convenience Store	Public House	Petrol Filling Station	Police Station	Fire Station	Doctors Surgery	Dentist Surgery	Sports Recreation Area	Children's Play Area	Public Toilets	Public Car Park	Library	Mobile Library	Bank	Information Centre	IT Centre/Facility	Recycling Facility
Dunster	6	✓		✓		✓	✓	✓	✓	✓				✓		✓	✓	✓	✓				✓		✓
Exford	6			✓		✓	✓	✓	✓	✓						✓	✓	✓	✓		✓				✓
Lucombe	5		✓			✓	✓																		
Luxborough	6					✓	✓			✓						✓	✓		✓		✓				
Lynton & Lynmouth	6	✓	✓	✓		✓	✓	✓	✓	✓		✓	✓	✓		✓	✓	✓	✓	✓		✓	✓	✓	
Monksilver	2					✓	✓			✓											✓				
Parracombe	6	✓		✓		✓	✓	✓	✓	✓						✓	✓	✓			✓				
Porlock	6		✓	✓		✓	✓	✓	✓	✓	✓		✓	✓		✓	✓	✓	✓	✓			✓	✓	✓
Roadwater	5					✓	✓	✓	✓	✓	✓					✓	✓	✓			✓				
Simonsbath	0					✓				✓								✓	✓						
Timberscombe	6	✓		✓		✓	✓	✓		✓						✓	✓				✓				
Winsford	6					✓	✓	✓	✓	✓						✓	✓	✓	✓		✓			✓	

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Settlement	Bus (days per week)	Daily bus >5 X a day	Community Transport	Primary / First School	Middle School	Place of Worship	Village/Town Hall	Post Office**	Convenience Store	Public House	Petrol Filling Station	Police Station	Fire Station	Doctors Surgery	Dentist Surgery	Sports Recreation Area	Children's Play Area	Public Toilets	Public Car Park	Library	Mobile Library	Bank	Information Centre	IT Centre/Facility	Recycling Facility
Withypool	1					✓	✓	✓	✓	✓								✓	✓						
Wootton Courtenay	5					✓	✓	✓	✓							✓					✓				

Please note that some facilities/services may be provided on the same premises.

* West Somerset and North Devon Councils also provide doorstep recycling collections

**Post Offices now offer some limited banking facilities for certain banks (i.e. cash withdrawal and paying-in services)

Appendix 13 Overview of the Services & Facilities in Exmoor's Smaller Settlements

The table below provides an overview of the services and facilities in Exmoor's smaller settlements, which has been used to inform the choice of potential additional settlements for Option B.

Smaller Settlements LDF Analysis	Houses			Community Services					Businesses				Comments	West Somerset or North Devon Local Plan policies
	1 - 10 dwellings	11 - 20 dwellings	21-30 dwellings	Church / Chapel	Village Hall	Community Events	Mobile Library	Public House	A Class - Shops, Cafes & Restaurants	B Class - offices, industry	C Class - hotels and guest houses	Other		
Hawkridge	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	C-Use Class - Self-catering holiday lets. Community Events - Hawkridge Revel, Hawkridge Film Society and Hawkridge Open Gardens. Has a community website.	N/A
Twitchen	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Mostly within the National Park boundary. There is a church and village hall within the settlement.	N/A
Heasley Mill	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Has a car park beside the village hall - 9 dwellings inside the ENP boundary and 5 outside. Chapel is redundant	Classed as countryside - only agricultural workers dwellings or those for staff in rural based industries permitted. Agricultural development and re-use of buildings in the countryside.

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Kentisbury / Kentisbury Town	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Only Barton Farm and the Church are inside the ENP boundary. The school, village hall and garage are located outside the National Park and not within Kentisbury Town. Has a community website.	Classed as countryside - only agricultural workers dwellings or those for staff in rural based industries permitted. Agricultural development and re-use of buildings in the countryside. Only Kentisbury Ford is recognised as a rural settlement.
Trentishoe	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	C-Use Class - a number of self-catering holiday lets. Has a joint village hall facility with Kentisbury.	N/A
Martinhoe	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	C-Use Class - Old Rectory Hotel and self-catering cottages	N/A
Countisbury	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>		N/A
Rockford	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		N/A
Oare	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Malmsmead shop and tearooms - although in Brendon parish are considered to be well-related to Oare.	N/A
Porlock Weir	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	B-Use Class - workshops, A-Use Class shops, hotel and restaurant. Also has a harbour and car park. Possibly over 30 dwellings	N/A

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West Porlock	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	C-Use Class - West Porlock Hotel. Porlock Martial Fitness Club held in The Hut, West Porlock.	N/A
Bossington	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Mostly within floodzones 2 and 3. Has a visitors car park, public toilets and Bossington Birds of Prey Centre. Parish hall in Allerford.	N/A
Selworthy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	A-Use Class - National Trust shop and Periwinkle Tearooms - parish hall is located in Allerford. Selworthy Farm B&B	N/A
Tivington	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Settlement taken from south of Venniford Cross to St Leonards Church. Clements Cottage B&B	N/A
Withycombe	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Withycombe has around 13 houses within the ENP boundary but the village (estimated 50+ dwellings) with a village hall and church.	Withycombe designated a 'small village' in the WS Local Plan - residential development to meet local needs only - the priority for infill, conversions and redevelopment of PDL.
Rodhuish	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Hamlet is split by the National Park boundary. Approximately 8 dwellings within ENP and 6 outside (of which 3 are farms)	Not a designated settlement within the West Somerset Local Plan - therefore in policy terms this area is countryside.

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Nettlecombe	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Joint village hall facility with Monksilver and Elworthy. Has Nettlecombe Field Studies Centre. Event - Nettlecombe Fete	N/A
Leighland Chapel	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	10 dwellings surround St Giles Church	N/A
Treborough	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Very small settlement with 5-6 houses	N/A
Elworthy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Joint village hall facility with Monksilver and Nettlecombe	N/A
Bury	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	A relatively substantial group of houses with no community facilities - the chapel was converted in the 1980s	N/A
Battleton	Acknowledge this settlement as part of Dulverton regarding qualification for affordable housing (including outside the ENP boundary). No sites for future development due to environmental constraints.													

Note shaded boxes indicate shared facilities or that facilities are located outside the National Park boundary

Appendix 14 Draft Vision, Objectives and General Policies 1-3

The text below is the version that was assessed for this Sustainability Appraisal.

DRAFT VISION

‘Enhancing the qualities that make Exmoor special’ so that:

□ **Exmoor’s distinct and diverse landscape is in good condition and there is an increased awareness of its importance.**

In 2030, Exmoor’s outstanding natural beauty with its mosaic of distinct and diverse landscapes and its dramatic coast has been safeguarded and enhanced. Exmoor is valued for the range of ecosystem services its natural environment and agriculture provide, from clean water, and sustainable food to ‘carbon sinks’ to address climate change from a planned increase in woodland cover and mire. Exmoor is still recognised as providing a sense of remoteness, wildness and tranquillity with landscapes predominantly free from and with no increase in? Intrusive structures and large scale development and renowned for its views of the night sky and lack of light pollution. The NPA and neighbouring authorities have worked together to ensure that the quality of the environment extends beyond the National Park boundary.

□ **There is an increased extent of wildlife habitats in good condition and thriving populations of valued native plants and animals.**

Exmoor’s habitats are maintained, restored extended and linked effectively to other ecological networks including moorland, mire, coastal heath and native woodlands and, together with farmed landscapes, have thriving populations of native plants and animals. Consequently, wildlife populations are more resilient and, as a result, the number of species declining or lost from Exmoor as a result of climate change has been minimised.

□ **There is an enhanced knowledge of the historic environment of Exmoor; increased awareness of the value of its cultural heritage, and the most important historical sites, settlements, buildings and features are conserved and their historical character retained.**

The historic environment, cultural and community heritage of the people of Exmoor has been sustained. Archaeological sites, historic settlements, buildings, farmsteads and features are conserved and where appropriate enhanced and new development has been carefully managed to ensure that the diversity and traditional and historic character of Exmoor’s settlements and buildings are conserved and enhanced for future generations. Communities and partners, including the NPA, have worked together to produce and deliver a vision and holistic plan for the enhancement of individual settlements and, together, these have been recognised for their contribution to Exmoor’s distinctive cultural heritage and in strengthening its communities. The result has been high quality, sometimes contemporary sustainable, design. This has successfully blended the new with the old and minimised its contribution to climate change by using natural and, where possible, local materials, being energy efficient, using sustainable construction techniques and appropriate renewable technologies. There are sources and supply chains for local building materials to serve the needs of Exmoor’s communities including from

small scale stone quarries and well managed woodlands and these both conserve and enhance the environment and support the local economy.

□ Air, water and soil are unpolluted/uncontaminated [high quality] and we are closer to achieving a carbon-neutral National Park to help tackle climate change.

Exmoor's air and water are clean and of high quality. As climate change results in hotter, drier summers and wetter, more stormy winters, measures are in place to conserve water, reduce runoff and avoid and reduce flooding and soil erosion in a way compatible with National Park purposes.

The impacts of climate change on Exmoor's natural environment, its communities, businesses and the effect on its resources are better understood through monitoring and research. They are being planned for and actively addressed through mitigation and adaptation measures to help make Exmoor more resilient to changes without compromising the special qualities of the National Park. The coastal communities of Porlock Weir and Lynmouth, affected by sea level rise, are working with the NPA and other partners to plan for and adapt to changes. Sustainable development can be seen in action as everyone is inspired to play their part in working towards a carbon- neutral National Park and more sustainable lifestyles to help tackle climate change. Appropriate renewable energy technologies, are in place and these are located, designed and at a scale to conserve Exmoor National Park's landscape and wildlife with areas, including its skylines and open expanses, remaining free of them. Exmoor's communities have found ways of reducing, reusing and, recycling waste and have access to facilities. Together with sustainable agriculture, low carbon transport and travel, sustainable living is becoming the norm.

□ There is increased public awareness and enjoyment of the National Park, particularly by young people and non-traditional users, leading to greater understanding of Exmoor and its way of life and a wider appreciation of the contribution that National Parks make to quality of life

There is a warm welcome and high quality experience for everyone who visits Exmoor seeking inspiration, tranquillity and active outdoor recreation, provided by a sustainable tourism and recreation economy in harmony with local communities and the environment, and contributing to the achievement of a carbon-neutral National Park

There is a warm welcome and high quality Exmoor experience for everyone who visits the National Park to discover its natural and historic environment, seek inspiration, enjoyment, tranquillity, wildness and to take part in active outdoor recreation and activities. These are linked to a viable and sustainable local economy (including the local area beyond the National Park) with a range of accommodation including that which enables young people and families to stay based on small scale, accessible educational, tourism and recreation facilities which benefit from and are in sympathy with Exmoor's environment and ways of life and which respond to the needs of visitors and local communities. As car travel has become more expensive, people are choosing to extend their visits, use alternative forms of transport and rely less on the private car.

Exmoor's communities retain a continuity of connection with the land; people have access to affordable services and facilities, and there is a strong, diverse and sustainable economy that benefits from and contributes to the care and appreciation of Exmoor National Park.

Profitable and competitive environmentally friendly farming, forestry and land management enterprises in Exmoor National Park are playing a lead role in conserving and enhancing Exmoor's landscape, wildlife and cultural heritage, ensuring the viability of distinctive local breeds or livestock, producing food and are making a major contribution to achieving a carbon-neutral National Park [\[link with upland review\]](#) – [\[replace low carbon with sustainable – discussion on recognition of existing farming in upland areas being low carbon\]](#)

All communities on Exmoor are viable, healthy, prosperous and able to retain young and working age people. They take an active part in decisions and development in the National Park and are at the heart of decisions about their future. They work in partnership with the NPA and others to plan and achieve their aspirations while conserving Exmoor's environment. Everyone, including those without a private car, can access essential services and facilities including outside the National Park in Devon and Somerset. This has been achieved through the retention of and, where opportunities have allowed the improvement and increased flexibility of community services, facilities, recreational and green space and this has helped meet the needs of Exmoor's communities and visitors and minimised the need to travel.

Communities within thriving, living and working landscapes retain a continuity of connection with the land and all have access to allotments. Sustainable and viable low carbon farming, forestry, land management and rural enterprises based on Exmoor National Park's special qualities are playing a lead role in stewardship of the land, conservation and enhancement of Exmoor's landscape, wildlife and cultural heritage and in the production of a recognised Exmoor brand of high quality food, and an increase in the use of biomass such as wood fuel from Exmoor's woodlands serving a local market,. Together, farming, forestry and land management help underpin a strong, diverse and sustainable local economy that benefits from and contributes to the care and appreciation of Exmoor National Park.

Small businesses and homeworking increasingly make an important contribution to Exmoor's employment and local economy and have been able to take advantage of high quality broadband for all and improved telecommunications. These are designed to ensure that the Exmoor's landscape is conserved by mimicing natural features and using existing structures.

The development that has taken place in the National Park has addressed the socio-economic needs of the local community rather than external demand. New housing (or 'Homes for Exmoor') is small scale and sympathetically designed to provide for local and affordable housing needs for those with a strong connection through living or working in the National Park. These have been achieved through the best use of land, existing homes, and buildings . New housing and employment is located in and adjoining Exmoor's settlements and compatible with the National Park's landscape. They may be rented or owner occupied and many are self build projects. Existing homes have been adapted, subdivided or new development

designed so as to be flexible to the changing needs of a household. Some homes may be live work units or are designed to be part of a low impact, land based sustainable lifestyle, linking with local resources, economy and services. As a result, local families, young and older people have been able to stay on Exmoor, and thereby contribute to vibrant, mixed working communities with strong support networks and a buoyant local economy. This together with the retention of services and facilities and local employment has benefited Exmoor's communities and visitors as its settlements become increasingly self contained.

Public and community transport services have been retained and tailored to the needs of communities and visitors and opportunities for walking, cycling and horse-riding, have been increased by linking rights of way and access to open areas and green space including across the National Park boundary. The traditional and distinctive character of Exmoor's environment has been conserved and, together with the safety of all users, have been enhanced through innovative approaches to slow traffic in settlements and encourage more walking, cycling and horse-riding through appropriate highway design and infrastructure, minimising signs and street lighting. Essential utilities and infrastructure have been well designed to blend in with the landscape.

DRAFT OBJECTIVES

A1 To conserve and enhance Exmoor’s landscapes as living working landscapes that remain predominately free from intrusive developments, structures and activities and maintain a sense of tranquillity and protect Exmoor’s dark skies.
A2 To ensure that Exmoor’s moorlands remain open, remote and relatively wild in character, that views are preserved and strategically important areas of former moor and heath are managed in a way that restores their wilder landscape character.
B1 to protect and enhance Exmoor’s wildlife and habitats and seek to improve the diversity, extent and condition of Exmoor’s important and valued habitats
B2 to maintain or increase the populations of native wildlife species on Exmoor that are valued for their conservation status and local distinctiveness, and control and eradicate non-native species.
C1 To ensure that the built tradition, character, distinctiveness and historic character of Exmoor’s settlements, buildings, farmsteads, landscapes, archaeological sites and monuments is conserved and enhanced and that the cultural heritage of Exmoor is protected through the careful management of development.
C2 To encourage new development to use local materials, sustainable building design and methods, in ways that contribute to the distinctive character and cultural heritage of Exmoor
D1 To conserve and enhance Exmoor’s natural resources and to improve air and water quality, conserve water resources, ensure soils are in good condition, maximise carbon storage, and minimise pollution.
D2 To minimise the net emissions of carbon dioxide and other greenhouse gases into the atmosphere in order to achieve a carbon neutral National Park and support measures which contribute to carbon neutrality in ways that both conserve and enhance the National Park
D3 To adapt to the anticipated effects of climate change on Exmoor’s communities, businesses, landscape, wildlife and coast including flood risk, sea level rise, unexpected weather events etc.
D4 To support sensitively sited appropriately scale low carbon and renewable energy development which conserves Exmoor’s landscape, wildlife and cultural heritage.
D5 To minimise waste and emissions and support opportunities for reuse and, recycling in ways compatible with Exmoor’s National Park designation
H1 To support Exmoor’s communities and partnerships to plan development in their neighbourhoods to help meet their needs and aspirations while conserving the special qualities of the National Park
H2 To support communities and partnerships in addressing local and affordable housing needs for those with a strong connection through living or working in the National Park
H3 To reduce the level of unmet local affordable housing need by making the best use of existing developed land and buildings, ensuring a mix of housing and a housing stock which helps sustain local communities

H4 To improve the sustainability, resilience and self-sufficiency of the National Park's settlements by supporting the retention, provision of and access to community services and facilities
E1 To support actions that help achieve a strong, diverse, resilient and self-sufficient economy and encourage economic and employment opportunities which are consistent with National Park purposes.
E2 To support measures that assist in the achievement of profitable and competitive farming, forestry and land management in ways that conserve and enhance the landscape, wildlife, cultural heritage and natural resources of the National Park whilst ensuring the viability of distinctive local breeds or livestock, producing food and making a major contribution to achieving a carbon-neutral National Park
E3 To support the tourism industry in providing a warm welcome and high quality Exmoor experience for visitors and communities alike to discover Exmoor's natural and historic environment, seek inspiration, enjoyment, tranquillity, wildness and to take part in active outdoor recreation and activities. This is supported by a range of sustainable accommodation, services and facilities.
F1 To provide opportunities for people from all backgrounds and abilities, including <i>with a particular focus on</i> young people and new audiences, to learn about and enjoy Exmoor National Park, leading to a greater understanding of Exmoor and its way of life
G 1 To maintain and improve the recreational opportunities in the National Park particularly the rights of way network and access to open country and other quiet and active recreation and enjoyment based on Exmoor's special qualities <i>and ensure that opportunities for recreation can be enjoyed by people from all backgrounds and of all abilities</i>
To achieve high quality broadband for all, telecommunications and essential utilities and infrastructure in ways commensurate with the conservation of the National Park's natural beauty, landscape wildlife, cultural heritage and special qualities.
To support sustainable transport for residents and visitors by improving public and community transport services and opportunities for walking, cycling and horse riding including linkages across the National Park boundary
To increase public involvement in the monitoring, evaluating, protecting and celebrating of Exmoor's special qualities.
To undertake a programme of research and monitoring to better understand the impacts of climate change on Exmoor's special qualities, and develop appropriate responses.

Exmoor National Park Core Strategy General Policies

General Policy 1: Achieving National Park Purposes and Sustainable Development

General Policy 2: Sustainable Development Management Principles

General Policy 3: Major Development

Written Justification

Achieving National Park Purposes and Sustainable Development

The National Park Circular 2010 states that the National Park Authorities' primary responsibility is to deliver their statutory purposes and in doing so, that they should ensure they are exemplars in achieving sustainable development, helping rural communities in particular to thrive. The Circular sets out a joint vision to 2030 including that: *By 2030 English National Parks and the Broads will be places where 'there are thriving, living, working landscapes notable for their natural beauty and cultural heritage. They inspire visitors and local communities to live within environmental limits and to tackle climate change. The wide range of services they provide (from clean water to sustainable food) are in good condition and valued by society. Sustainable development can be seen in action. The communities of the Parks take an active part in decisions about their future. They are known for having been pivotal in the transformation to a low carbon society and sustainable living. Renewable energy, sustainable agriculture, low carbon transport and travel and healthy, prosperous communities have long been the norm'.*

Policy GP1 reflects National Park purposes and, together with Policy GP2, defines sustainable development for Exmoor National Park. Policy GP3 sets out the tests for major development within the National Park. The three policies therefore fulfil the requirements of European Union Directives, the Environment Act 1995 and national planning policies. Policies GP1, GP2 and GP3 underpin the Vision, Objectives and all other policies in this Core Strategy and ensure that every decision is determined in line with National Park purposes and the socio-economic duty. This includes a requirement in Policy GP1 for schemes to not only conserve the National Park but also to encourage enhancement of the National Park as defined in this plan at Policy x and as required by legislation

Purposes of the National Park

The purposes of National Park designation were established in the National Parks and Access to the Countryside Act 1949, and amended by the Environment Act 1995, to:

National Park Purposes

- I. **Conserve and enhance the natural beauty, wildlife and cultural heritage (of the National Parks); and**
- II. **Promote opportunities for the understanding and enjoyment of the special qualities (of the National Parks) by the public.**

National Park Authority Duty:

In pursuing the statutory purposes, National Park Authorities have a duty to seek to foster the economic and social well-being of local communities.

Exmoor National Park Authority aims to avoid potential conflicts and instead will therefore continue to encourage early discussion on proposals and close working and co-operation with partners to find solutions. However, where there is irreconcilable conflict between the National Park purposes, the first purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage should prevail. This concept is known as the ‘Sandford Principle’⁶

The achievement of National Park purposes relies on the active support and co-operation of Government and public bodies including local authorities and utility companies whose activities affect Exmoor. As ‘relevant authorities’ many have legal obligations under section 11A of the 1949 Act and section 17A of the 1988 Act which places a statutory duty on them to have regard to National Park purposes when making decisions or carrying out activities relating to or affecting land within the National Park. Where their activities outside National Parks might have an impact inside them, the Government says they should cooperate across National Park boundaries.

Sustainable Development

A fundamental aim of the Core Strategy is to ensure that development in the National Park is sustainable. A widely-used and accepted definition of sustainable development is: “development which meets the needs of the present without compromising the ability of future generations to meet their own needs⁷.” The UK Sustainable Development Strategy 2005, sets out five guiding principles for sustainable development which includes living within environmental limits, ensuring a strong, healthy and just society, achieving a sustainable economy, using sound science responsibly and promoting good governance.

The Government sets out, in the new draft National Planning Framework that the purpose of planning is to help achieve sustainable development. It states that development that is sustainable should go ahead, without delay - a presumption in favour of sustainable development that is the basis for every plan, and every decision. The draft National Planning Framework sets out three components of what delivering sustainable development means for the planning system:

- **planning for prosperity (an economic role)** – use the planning system to build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type, and in the right places, is available to allow growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure
- **planning for people (a social role)** – use the planning system to promote strong, vibrant and healthy communities, by providing an increased supply of housing to meet the needs of present and future generations; and by creating a good quality built environment, with accessible local services that reflect the community’s needs and supports its health and well-being; and

⁶ Section 11a (2) of The National Parks and Access to the Countryside Act 1949 (inserted by Section 62 of the Environment Act 1995)

⁷ Bruntland Commission “Our Common Future” (1987)

- **planning for places (an environmental role)** – use the planning system to protect and enhance our natural, built and historic environment, to use natural resources prudently and to mitigate and adapt to climate change, including moving to a low-carbon economy.

The Government states that these three components should be pursued in an integrated way, looking for solutions which deliver multiple goals.

Sustainability Appraisal

All development plan documents are now subject to Appropriate Assessment under the Habitats Regulations and Sustainability Appraisal (SA), which incorporates the requirements of Strategic Environmental Assessment (SEA) under EU Directive 2001/42/EC. This is to determine to what extent the aims, objectives, policies or proposals provide for sustainable development and whether they will have any adverse effects on environmental interests. A set of sustainability objectives has been defined to assist with the SA assessment which seeks to define the principles of sustainable development for the policies of this document.

Some proposals may require an Environmental Impact Assessment.

Major Development

The Government's longstanding view has been that major development should not take place in National Parks save in exceptional circumstances, as set out in national planning policy including PPS7, the draft National Planning Policy Framework and English National Parks and the Broads UK Government Vision and Circular 2010. Such circumstances include the Silkin Test principles – that the development is absolutely necessary, in the national interest and that there is no practical alternative. Certain categories of development will also require an Environmental Impact Assessment.

Exmoor National Park's landscape is recognised as being relatively free from major structures or development. In 2010/11 Exmoor National Park had x planning applications and most of these were for x. As a result, development that may be considered minor or small scale elsewhere may potentially have a significant and cumulative impact on the National Park's natural beauty. As such major development is not defined just in terms of its size but in terms of its impact on the National Park and its special qualities. Such development, depending on its scale and potential impact, could include: power stations, large scale renewable energy development, new transmission lines, large scale tourism and leisure schemes, a development of 10+ dwellings, oil and gas pipelines, waste management and mineral operations, sewage and water treatment works, road schemes and large agricultural buildings.

DRAFT POLICIES

Policy GP1 Achieving National Park Purposes and Sustainable Development

Sustainable Development for Exmoor National Park will conserve and enhance the National Park and its special qualities, promote opportunities for the understanding and enjoyment of the special qualities by the public; and, in so doing, foster the social and economic well-being of local communities.

- **In achieving sustainable development, all proposals/development will demonstrate that:**
 - **It is consistent with the National Park's legal purposes and duty. Where there is irreconcilable conflict between the statutory purposes, the conservation and enhancement of the National Park will prevail consistent with the Sandford Principle;**
 - **Proposals to enhance the National Park are consistent with Policy x**
 - **It conserves and enhances the special qualities of Exmoor National Park;**
 - **It does not adversely impact on the Vision and Objectives of the Exmoor National Park Partnership Plan and Local Plan; and**
 - **It contributes to the sustainable development of the area in line with the sustainable development management principles in GP2.**

Policy GP2 Sustainable Development Management Principles

All new development, activities and land uses within Exmoor National Park will conserve and respond to opportunities to enhance the National Park. Opportunities must be taken to contribute to the sustainable development of the area including by demonstrating that development:

- 5) is of a scale, and in terms of its siting, use, layout, form, design, materials and intensity of activity respects and has a favourable impact on the character, local distinctiveness, appearance and historic and cultural features of the site and buildings, settlement, landscape and setting**
- 6) supports the function of individual settlements and their communities**
- 7) makes efficient use of land, buildings, services and infrastructure and enables access to services and facilities, jobs and technology**
- 8) is acceptable in terms of access and traffic levels and which, where appropriate, enables the use of sustainable transport**
- 9) will conserve or enhance tranquillity including Exmoor's dark sky and the quiet enjoyment of the National Park,**
- 10) will not harm the amenities of visitors, local residents and occupiers of neighbouring properties**
- 11) uses sustainable construction principles and minimises energy use and waste including taking account of the embodied energy of materials and by appropriately re-using any materials from existing buildings or the site.**

- 12) conserves and enhances the natural environment and conditions for biodiversity and geodiversity;**
- 13) maintains the quality of natural resources including water and air and conserves soils**
- 14) adapts to and mitigates the impact of climate change, particularly in respect of carbon emissions, energy and water demand and flood risk.**
- 15) supports the socio-economic wellbeing of local communities and the National Park.**
- 16) considers the needs of future generations.**
- 17) is acceptable in terms of ground conditions**

Policy GP3 Major Development

In securing National Park purposes 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.

Proposals for major development will need to demonstrate to the satisfaction of the National Park Authority:

- i) 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;**
- (ii) the cost of, and scope for, developing elsewhere outside the National Park, or meeting the need for it in some other way; and**
- (iii) 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.**
- (iv) The cumulative impact of the development when viewed with other proposals and types of development.**
- (v) The scope for adequate restoration of the land once the use has ceased.**

Where a proposal for major development can demonstrate a significant net benefit to the National Park, every effort to mitigate potential localised harm and compensate for any residual harm to the area would be expected to be secured.

Appendix 15 – Changes to draft General Policies 1-3 in the light of the Sustainability Appraisal

Policy GP1 – recommendations	Changes
Recommendation 1: Policy GP1 is amended to insert reference to the ' <i>natural beauty, wildlife and cultural heritage of the National Park</i> ', mirroring the wording of the National Park's first purpose	Accepted
Recommendation 2: The Vision statement and Objectives could be strengthened by reference to ' <i>expanding and connecting</i> ' habitats and ' <i>creating networks of multi-functional green infrastructure</i> '	The Vision and Objectives both have references to expanding the extent of habitats and increasing connections between them. There are no specific references to green infrastructure as the vision and Objectives were considered to sufficiently cover networks and linkages.
Recommendation 3: The draft Objectives could be strengthened by reference to health and wellbeing	The health and wellbeing of communities was considered to be part of Objective 11, meeting communities' needs and aspirations.
Recommendation 4: The Vision could be strengthened by specific reference to affordable housing and transport	The Vision includes 'access to services, housing, communications and infrastructure'. Specific references to affordable housing are made in the longer vision statement, and the Objectives. Sustainable transport is one of the Objectives.
Recommendation 5: The wording of the policy is strengthened to positively support achievement of the Vision and Objectives, rather than avoid adverse impacts on them	Accepted
Recommendation 6: The Objectives could be strengthened by reference to protecting the special qualities of the National Park from mineral extraction and supporting the supply of local building materials through small scale stone quarries	This is implicit in Objective 6, ' <i>to use local materials, sustainable building design and methods</i> '
Policy GP2 – recommendations	Changes
Recommendation 7 – add ' <i>and helps create and connect habitats and networks of green infrastructure</i> ' to Principle 8.	Accepted. Networks of green infrastructure now form part of Principle 7.
Recommendation 8: amend Principle 2 to read ' <i>supports the function, sustainability and resilience of individual settlements and their communities</i> '.	Principle 2 has been substantially revised to provide more details of what functions settlements are expected to provide

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Recommendation 9: make reference to health and community participation in Principle 11, and to services and safe, attractive public spaces in Principle 2.	Accepted.
Recommendation 10: add reference to 'local' services, facilities and jobs to Principle 3.	Accepted.
Recommendation 11: consider splitting Principle 1 into two principles (one regarding scale, siting etc and intensity of activity, and the other regarding favourable impact on character etc.)	Not accepted. Members wished to reduce the number of principles. It was also felt important to keep all these elements together.
Recommendation 12: include reference to local, traditional sustainable building materials in Principle 7.	Accepted.
Recommendation 13: make specific reference to affordable housing in the Principles.	Not accepted. Affordable housing is included in the Objectives and Vision.
Recommendation 14: include reference to avoiding or reducing pollution, perhaps in Principle 9	Accepted.

Policy GP3 – recommendations	Changes
Recommendation 15: Policy GP3 could be strengthened by test (vi) including the avoidance of harm, before mitigation and compensation are sought.	No changes made.
Recommendation 16: GP3 could be strengthened in relation to the Community wellbeing, Economy and employment and Housing topics by reference to the duty on National Park Authorities to foster the social and economic well-being of their communities.	Accepted.
Recommendation 17: GP3 could be strengthened in relation to the Housing topic by addition of reference in test (vi) to Where a proposal for major development can demonstrate a significant net benefit to the National Park and its local communities.	Accepted.