Exmoor National Park Local Plan: Proposed Main Modifications (including minerals and waste policies)

Sustainability Appraisal Report

Non-Technical Summary

Project Title: Sustainability Appraisal of the Exmoor National Park Local Plan Publication Draft

Client: Exmoor National Park Authority

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1	27/05/15	Non-Technical Summary of the Sustainability Appraisal Report for the Publication Draft version of Exmoor's Local Plan	Kate Nicholls	Taran Livingston	Taran Livingston
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Prepared by LUC
December 2016

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Introduction

The Sustainability Appraisal Report

1.1 Exmoor National Park Authority is preparing a Local Plan which will guide development in the National Park up to 2031. The aim of the Local Plan is to ensure that any new development will help to achieve the National Park purposes and deliver sustainable development.

1.2 The National Park Authority is required by law to carry out a Sustainability Appraisal (SA) which involves testing the policies in the emerging Local Plan against a set of sustainability objectives. This helps to identify what the effects of the Local Plan will be on social, economic and environmental issues. The findings of this process are reported in the full Sustainability Appraisal (SA) report[1] and are summarised in this Non-Technical Summary.

Methodology

1.3 The SA of Exmoor's Local Plan has been carried out by external consultants in consultation with the National Park Authority.

1.4 The first stage of the SA is known as the 'scoping' stage. In 2010 a Scoping Report for the Local Plan was produced, which set out a framework for undertaking the SA as the Local Plan was prepared. The Scoping Report included:

- Description of the baseline characteristics of the National Park including the social, environmental and economic issues that face the area. Consideration was also given to how the situation might change if the Local Plan were not to be prepared.

- A summary of the wider policy context that will inform the Local Plan.

- SA objectives against which the emerging Local Plan would be assessed.

- Monitoring indicators that would be used to measure the effects of the Local Plan once it is implemented.

1.5 The baseline information for Exmoor National Park has been updated and can be found in Appendix 1 of the full SA report.

1.6 The Scoping Report also identified a series of sustainability topics to provide a framework for the SA:

- Air and water quality

- Biodiversity and green infrastructure

- Climate change adaptation and flood risk

- Climate change mitigation and energy

- Community and wellbeing

- Economy and employment

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[1] Exmoor Local Plan: Proposed Main Modifications (including minerals and waste policies) Sustainability Appraisal Report, LUC, December 2016

- Historic environment
- Housing
- Land
- Landscape
- Coast
- Transport

1.7 For each topic, a set of sustainability objectives and criteria were identified to test the emerging Local Plan against. Indicators for monitoring the effect of implementing the Plan on each topic were also set out. The full SA framework, which comprises the SA topics, objective, criteria and indicators, is shown in **Table 1** overleaf.

1.8 Each Local Plan policy, including proposed main modifications, has been assessed against the topics and objectives in the SA framework and given a score to illustrate the likely effects.

1.9 The SA has been carried out iteratively as the Local Plan has been progressed, and SA reports have been produced to sit alongside each version of the Local Plan. This Non-Technical Summary relates to the full SA Report for the Exmoor Local Plan: Proposed Main Modifications and any implications for the SA arising from the Proposed Changes to Section 6.

1.10 The scoring system used in the SA is shown in **Figure 1** below.

Figure 1: SA scoring system

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

Table 1: SA Framework

Topic	Objectives	Criteria - will the proposals in the Plan…	Indicators
Air Quality and Water Resources	**1. To minimise air pollution (including greenhouse gas emissions) and water pollution and ensure air and water quality is maintained or improved.**	• Maintain or improve air and water quality? • Minimise emissions from residential and commercial sources? • Reduce emissions from transportation sources?	• 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	**2. To conserve and enhance biodiversity and to protect, conserve and enhance all habitats and species.**	• Conserve and enhance the diversity of species? • Conserve and enhance the diversity of habitats? • Make provision for protected and important species and habitats where appropriate? • Have no adverse impact on SACs or SSSIs? • Enhance local biodiversity and the natural environment?	• Area of new BAP habitat created or restored. • Number of SACs and SSSIs in favourable or unfavourable recovering condition. • Proportion of Local Wildlife Sites where positive conservation management has been or is being implemented (NI197). • Number of applications with provision for protected/important species. • Number of applications with provision for protected/important habitats. • Number of applications where a wildlife survey has been submitted.
Climate Change and Adaptation to Flood Risk	**3. To minimise and manage the risk of all forms of flooding.** **4. To minimise the impacts of climate change on Exmoor's communities and habitats.**	• 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?	• 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)

Topic	Objectives	Criteria - will the proposals in the Plan…	Indicators
			• 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.
Climate Change Mitigation and Energy	**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.**	• Ensure development incorporates energy sustainability measures? • Maximise Exmoor's potential for renewable energy generation? • Improve the sustainability of Exmoor's communities? • Encourage the use of sustainable building design and methods? • Encourage travel by sustainable means of transport?	• Domestic per capita CO2 (tonnes) – measure every 5 years. • Number of planning permissions for renewable technologies and other energy sustainability measures. • Housing development that incorporates energy and sustainability measures (above building regulation requirements).
Community and Wellbeing (including equalities and health)	**6. To promote and support thriving and inclusive communities, health and wellbeing.**	• Provide for community services? • Encourage healthy lifestyles? • Improve access to the Park and to its opportunities and facilities for all? • Create new access opportunities where appropriate? • Help to implement the installation of infrastructure for broadband and mobile technology that is sympathetic to the National Park setting? • Affect specific sub groups disproportionately compared with the whole population? • Cause changes in contacts with health and/or care services, quality of life, disability or death rates?	• 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.

Topic	Objectives	Criteria - will the proposals in the Plan…	Indicators
		• 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?	
Economy and Employment	**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.**	• Promote and support a sustainable tourism sector? • Promote and support a sustainable agricultural sector and other land based industries? • Promote and support small businesses? • Encourage use of local products and services? • Help to implement the installation of infrastructure for broadband and mobile technology that is sympathetic to the National Park setting? • Work with local employers to support/promote flexible / home working and ICT innovations? • Support local businesses and suppliers?	• Number of registered farm holdings. • % occupancy of beds in holiday accommodation throughout the year. • Tourist spending. • Occupancy rates for serviced and non-serviced accommodation. • % of tourism businesses participating in green/sustainable initiatives or schemes. • Number of applications permitted to create serviced/non-serviced accommodation. • Loss of serviced/non-serviced accommodation. • Number of applications permitted for: camp sites, camping barns, certificated caravan sites. • Number of applications/floorspace *(or monitor completed development)* for business development (B1, B2 & B8). Could also include separate indicators

Topic	Objectives	Criteria - will the proposals in the Plan…	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: • Conversion of traditional farm building • Conversion of modern farm building • New building • Number of applications permitted for development for game-bird shooting. • Number of applications approved for equestrian development.
Historic Environment	**8. To maintain and enhance the quality of the built environment.**	• 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?	• 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

Topic	Objectives	Criteria - will the proposals in the Plan…	Indicators
		• 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?	refused.
Housing	**9. To help ensure that National Park communities have access to appropriate, good quality, sustainable, affordable housing.**	• 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.	• 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	**10. To promote sustainable forms of development and**	• Promote sustainable mineral extraction? • Promote the reuse of land and buildings?	• Number of planning permissions built on previously developed land.

Topic	Objectives	Criteria - will the proposals in the Plan…	Indicators
agricultural, brownfield, contaminated land, waste and minerals)	**sustainable use of natural resources.** **11. To reduce all forms of waste production and promote reuse and recycling and minimise the risk of contaminated land.**	• 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?	• Loss of the best and most versatile agricultural land to development (need a GIS layer available on PACS). • Loss of greenfield land to development. • Percentage of waste generated, recycled, composted and sent to landfill. • Number of planning permissions for redevelopment of contaminated sites. • Number and type of mineral applications permitted.
Landscape	**12. To protect, maintain and enhance the special qualities of the Exmoor National Park's landscape character.**	• Reduce or mitigate the adverse effects of agricultural change on the landscape? • Ensure development is sited and designed with landscape in mind? • Reduce the impact of large structures and development that can be seen from the National Park? • Reduce the impact of recreational activities on the landscape? • Contribute to the wild, remote and tranquil setting of Exmoor? •	• Number of planning permissions (outside the National Park boundary) that enable large structures and development to be visible from the National Park boundary. • Agri-environment scheme uptakes. • Percentage change in farming businesses. • Loss or damage to key landscape features (woodlands, walls, hedges and hedgebanks) • Change in Countryside Quality based on Countryside Quality Counts data used to inform condition of Countryside Character Areas. • Number of lighting conditions attached to planning permissions.
Coast	**13. To protect and/or enhance coastal areas.**	• Put coastal communities and habitats at risk of the effects of coastal change?	• Number of planning permissions in areas vulnerable to coastal change

Topic	Objectives	Criteria - will the proposals in the Plan…	Indicators
		• 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?	• 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	**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.**	• Help to ease traffic congestion in the tourism season and provide more sustainable ways of accessing the National Park? • Safeguard public rights of way? • Improve opportunities for safe horse-riding, cycling and walking as an alternative to car travel? • Reduce the need to travel, especially by private car? • Improve access to online and mobile services to reduce travel by car? • Support demand responsive, low-carbon public transport for the local community? • Support improved (and low carbon) access to essential goods and services?	• 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.

Key Sustainability Issues

1.11　Exmoor has a high quality natural and built environment, so it offers a high quality of life for the majority of its residents and is attractive to visitors. The local economy is dominated by tourism, the service sector and land based industries. There is a strong sense of community with local traditions and ways of life. Like many parts of the UK there is an ageing population, but this is particularly pronounced on Exmoor.

1.12　The local environment has many positive features including recent improvements in the condition of many wildlife sites and heritage assets and generally good air and water quality. Visitor numbers and spend are increasing, and employment rates are low. However, there are also some key sustainability issues that the Local Plan seeks to address, including:

- The provision of affordable housing to meet local needs.

- The lack of suitable land for development.

- Maintaining local services and facilities.

- Supporting local economic development.

- Protecting the historic environment while still allowing for change.

- Maintaining the valued landscape character and features including the sense of openness on the moor, and tranquillity.

- Protecting and enhancing wildlife and the natural environment.

- Encouraging sustainable transport.

- Responding to climate change.

- Helping to mitigate future climate change.

- Maintaining the quality of Exmoor's natural resources such as air quality and water resources.

1.13　As set out in the SA Scoping Report, in general, the Exmoor Local Plan should help to address these sustainability issues, more so than if there was no Local Plan, as it can include policies that more specifically seek to address the issues in the National Park than existing relevant national policy.

Policy context

1.14　Exmoor's Local Plan is not prepared in isolation. It is strongly influenced by other plans, policies and programmes and by broader sustainability objectives. It needs to be consistent with international and national guidance and planning policies and should contribute to the goals of a wide range of other programmes and strategies, such as those relating to social policy, culture and heritage. The Local Plan must also conform to environmental protection legislation and the sustainability objectives established at an international, national and regional level. A review of the policy context for the Local Plan can be found in the full SA report.

SA Findings: Summary of Sustainability Effects of the Publication Draft Local Plan

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

1.16   The potential sustainability effects of the Exmoor National Park Local Plan: Proposed Main Modifications were assessed using the SA objectives and criteria. The following sections summarise the SA findings for the Local Plan: Proposed Main Modifications and are structured in line with the chapters of the Local Plan.

Exmoor Local Plan Vision, Strategic Priorities and Objectives

1.17   National Park Authorities are required to produce a Management Plan and keep it updated every five years. As the Management Plan for Exmoor (known as the 'Partnership Plan') and the Local Plan are both important documents for the National Park, it was decided that a joint vision and objectives should be developed, which set out what Exmoor should look like by the end of the Plan period.

1.18   A detailed appraisal of the vision and objectives is presented in the full SA Report along with an appraisal of the strategic priorities that are presented in Chapter 2 of the Publication Draft Local Plan: Vision, Objectives and Strategic Priorities.

1.19   The effects of the Vision, Objectives and Strategic Priorities are generally positive as they are aspirational and seek to address many of the topics covered by the SA framework. While a small number of negative effects were identified in relation to some of the objectives and strategic priorities, mainly because the aim to provide environmental protection could curb development, other policies in the Local Plan would provide mitigation.

Summary of SA findings for Chapter 3: General Policies

1.20   There have been minimal changes to the general policies (GP1 – GP5) since the Publication Draft version of the Local Plan in 2015. Policy GP2 is the only policy which has been subject to main modification, albeit the changes relate to minor policy wording. Changes have not affected previous SA scores.

1.21   There are a number of positive and strongly positive implications from the General Policies, particularly GP1: National Park Purposes and Sustainable Development which sets out the principles for conserving and enhancing the National Park.

1.22   Given the National Park's designation, it is not considered appropriate for major development to take place, helping to protect the special qualities, conserve natural resources and the limited supply of suitable land available for development, and also contribute to community wellbeing. However, this will preclude any major housing or economic development.

1.23   The spatial strategy aims to support local communities and businesses by identifying a range of settlements where economic development and affordable housing to meet local needs will be supported. Evidence gathered to support the preparation of the Local Plan has indicated that there is some capacity for

development in all the settlements identified in the spatial strategy, although in some cases the capacity is low, or constraints such as landscape sensitivity, wildlife designations or flood risk may limit development. Where possible the identification of settlements has sought to co-locate housing, employment and service provision in order to reduce the need to travel, but in a small number of villages there is no public transport or alternative community transport provision. Some of the larger settlements also have traffic and congestion problems, particularly during the peak holiday season, and higher levels of particulates due to the reliance on oil and wood-burning heating systems, which can affect air quality (although no standards have been exceeded).

Summary of SA findings for Chapter 4: Conserving and Enhancing Exmoor

1.24 A number of small changes have been made to the policies in this section of the Local Plan since the Publication Draft version in 2015. The main change has been the removal of policy CE-S8 from the Local Plan following examination. This policy related to development within minerals safeguarding areas. Given that the demand for local building stone is low in the National Park, it is considered that there is very little risk of sterilising the available building stone resource given the extent across the National Park.

1.25 Unsurprisingly there are a number of positive and strongly positive scores for these policies, as they primarily relate to the conservation and enhancement of Exmoor.

1.26 The strong protection of the National Park's landscape, wildlife, cultural heritage and special qualities means that there are mixed or negative effects on other SA topics including **Transport**, **Land**, and **Housing**. This is because the protection of these special qualities could constrain development, including the provision of housing, the conversion of buildings, transport infrastructure upgrades, or in some cases, increased access and recreation (if this was to lead to disturbance of protected wildlife species for example). However, the policies seek to enable development where possible, promoting high quality design and use of traditional and sustainable materials where appropriate to ensure that development adds to the character and local distinctiveness, and does not damage the environmental assets for which the National Park was designated.

1.27 The policies are generally positive for **Community and Wellbeing** as maintaining the high quality natural and built environment is important to people's health and well-being. Similarly, the high quality environment benefits the **Economy** as it is what attracts many people to live in, work in and visit the National Park. The policies could constrain some economic development, particularly large-scale, intrusive developments or activities. However, this is balanced by the benefits to the tourism sector, which relies on the high quality environment as a major draw for visitors.

1.28 There are some mixed implications in relation to **Climate Change Mitigation**. There is recognition of the need to support climate change mitigation, particularly through the re-use of existing buildings which will take account of the embodied energy within these buildings. There are also opportunities for mitigation through carbon sinks, including peatland restoration, and renewable energy opportunities. However, conservation of the National Park's landscape character, biodiversity and historic environment is likely to be one of the main constraining factors affecting renewable energy technologies; in particular large-scale wind turbines, which are

identified as potentially affecting visual amenity, and roof-mounted solar PV panels, which can adversely affect the character and appearance of traditional buildings.

Summary of SA findings for Chapter 5: Responding to Climate Change

1.29   A number of small changes have been made to the policies in this section of the Local Plan since the Publication Draft version in 2015, most of which are minor changes to policy wording intended to make points of clarification, cross-references to other policies in the Local Plan and to comply with the Written Ministerial Statement on wind energy development 18 June 2015. While these changes have not affected the SA scores, some have led to alterations in the assessment text.

1.30   Overall, the policies in this chapter are positive in relation to the natural and built environments as they recognise the implications of climate change for the landscape, wildlife and historic environment, and seek to enable these to adapt and to build resilience to future changes. There are also safeguards to protect natural resources, particularly through the avoidance of pollution, water conservation, and management of waste and sewerage.

1.31   A number of the policies are strongly positive in relation to **Climate Change Adaptation and Flood Risk**, as would be expected as they are aimed at addressing these issues. The policies seek to avoid inappropriate development in areas at risk of flooding by directing development away from areas at highest risk or, where development is necessary, making it safe without increasing flood risk elsewhere. Risks from sea level rise and coastal change are a concern for coastal communities, particularly in Porlock Weir, and the policies address this by avoiding inappropriate development in vulnerable areas or enabling a planned response to coastal change.

1.32   The policies are also mainly positive in relation to **Climate Change Mitigation and Energy**, as they are designed to address these issues. There are specific policies aimed at reducing emissions of greenhouse gases, through reducing energy demands, encouraging energy efficiency, promoting sustainable transport and promoting renewable energy. However, due to potential impacts on National Park purposes, particularly visual impacts and effects on landscape character and the historic built environment, the scale of renewable energy schemes is limited, meaning that the potential contribution to climate change mitigation is less than it could be.

1.33   There are both positive and negative implications for **Community and Wellbeing** and the **Economy**. The policies recognise the need for local communities and businesses to adapt to changes in climate, including responding to flood risk and coastal change, and build resilience to future changes. There are both costs and potential benefits from this, for example new business opportunities and local jobs arising from suppliers and installers of renewable energy technologies, although these will be tempered by the limitations of the scale of renewable energy that is considered appropriate in the National Park.

Summary of SA findings for Chapter 6: Achieving a Thriving Community

1.34   A number of changes to the policies in this section of the Local Plan have been made since the Publication Draft version in 2015, including the introduction of one new policy (HC:DX: Vacant Buildings in Settlements) and the removal of one policy (HC-D6: The Change of Use of Service Accommodation to Housing). Policy HC-DX was introduced to set out the criteria which will apply before the change of use or

redevelopment of vacant buildings within the National Park is permitted. Policy HC-D6 was removed as change of use of serviced accommodation is now considered within policy RT-D3.

1.35   Overall, the policies are mainly positive or neutral in relation to the sustainability objectives. The housing policies in this chapter aim to ensure that the housing needs of local National Park communities are addressed and that the level of housing development is compatible with the conservation and enhancement of Exmoor.   Analysis of housing needs and existing housing stock has shown that there is a lack of smaller (and more affordable) housing such as terraces and flats. Local needs affordable housing is occupied by a high proportion of children, young people and working age adults with a local connection who cannot afford to buy open market housing, yet wish to remain living and working in the National Park.

1.36   Exmoor has a significantly higher proportion of older people than the national average and this is likely to increase in future. As people grow older their housing needs often change and older people or those with disabilities may have specialist accommodation needs that are not met by the general housing stock. The Local Plan includes policies to allow for these needs to be accommodated, including HC-S2 A Balanced Housing Stock, HC-D3 Accessible and Adaptable Housing for Exmoor's Communities and HC-D4 Extended Family Dwellings Criteria. Policy HC-S2 also requires that at least 20% of dwellings (in schemes of 5 or more) meet the Building Regulations requirement M4(2) for adaptable and accessible dwellings.

1.37   The Local Plan aims to ensure that new build housing within the National Park meets a local community need for housing which in terms of size, type and affordability will help create more balanced, living and working communities with a better mix of houses. It seeks to give those in housing need, particularly local young people, the opportunity to stay in their community and help maintain the viability of important services such as schools. However, National Parks are not suitable locations for unrestricted housing development, and there is a limited number of greenfield housing sites that could be developed within the National Park's settlements without harm to landscape character. As a consequence, the policy approach is to maximise use of the existing stock of accommodation, buildings and previously developed land or buildings to reduce the level of greenfield housing development.

1.38   Focusing on local needs, affordable housing will generally be positive for the sustainability objectives, particularly in relation to **Community and Wellbeing** and **Housing**, as this is where the need has been demonstrated, although there will be mixed on the **Economy and Employment** with some potential negative impacts due to the restrictions of open market housing, but also positive effects from enabling affordable housing for local workers. Some potential negative effects are also identified in relation to **Transport**, **Air Quality and Water Resources** and **Climate Change Mitigation and Energy**, as in some cases housing could be provided in rural communities where levels of car use are likely to be higher.

1.39   The policy approach for housing is generally positive for the sustainability objectives relating to **Landscape**, **Biodiversity and Green Infrastructure**, **Historic Environment** and **Land**, particularly given the focus on reusing existing buildings as this will reduce pressures on the environment. Emissions of greenhouse gases from housing and during construction will also be low, helping to contribute to **Climate Change Mitigation and Energy**.

Implications of Proposed Further Changes to Section 6

1.40   The SA considered each of the proposed further changes to Section 6 of the Publication Draft Local Plan, in order to determine whether any of these changes would have implications for the SA findings. Changes were largely for clarification and to reduce the length and complexity of the plan. It was concluded that none of the changes would have implications for the SA, as the changes do not alter policies or the overall strategy and intention of the plan.

Summary of SA findings for Chapter 7: Achieving A Sustainable Economy

1.41   A number of changes to the policies in this section of the Local Plan have been made since the Publication Draft version in 2015, most of which are made to improve clarity and to make policies more concise. These updates have not resulted in any changes to the SA scores.

1.42   Overall, the policies in this chapter are positive or neutral in relation to most of the sustainability objectives. The policies seek to positively encourage appropriate business and employment development to help to strengthen, enhance and diversify the Exmoor economy and create employment. However, the policies also seek to ensure the economic benefits of Exmoor's high quality environment can continue so that new development avoids negative impacts on the area and is consistent with statutory National Park purposes. This is likely to constrain some economic development; for example the creation of new large scale employment opportunities such as major industry would be inappropriate within the National Park. As a consequence, some of the policies are not as strongly positive in relation to the **Economy** and **Employment** sustainability topics as might have been expected.

1.43   There is a focus on safeguarding existing sites and buildings, the re-use of existing buildings, and encouraging home-based working. This will minimise greenfield development and is a more sustainable approach in a National Park, given the limited supply of suitable greenfield land. It will also reduce the need to travel, contributing to climate change mitigation and sustainable transport objectives. The change of use to employment can also help secure the retention of a building's character, whilst also supporting the local economy. The Local Plan does not include the allocation of employment sites - these will consequently need to be considered on a case by case basis in relation to their sustainability. Any new employment sites and buildings that do come forward will be focused in existing settlements and will be of a type, scale and design appropriate to the local and National Park context, which will help to maintain the settlement character, minimise land-take and reduce the need to travel.

1.44   In the open countryside, Policy SE-S3 provides opportunities for employment development through the extension of existing employment buildings and the reuse of existing buildings in farmsteads or hamlets, particularly traditional buildings of historic or vernacular merit which could support farm diversification and help to provide local employment. Policy SE-S4 also supports agricultural and forestry development, in recognition of the vital role that traditional farming and woodland management has played in creating Exmoor's distinctive landscape and the importance of enabling the sector to respond to current and future changes.

Summary of SA findings for Chapter 8: Achieving Enjoyment for All

1.45   A number of changes to the policies in this section of the Local Plan have been made since the Publication Draft version in 2015, most of which are minor wording

changes to avoid repetition or unnecessary cross-references to other parts of the Local Plan. These updates have not resulted in any changes to the SA scores.

1.46   The policies in this chapter are generally positive or neutral for the SA topics of **Landscape**, **Biodiversity and Green Infrastructure**, and **Historic Environment**, reflecting the opportunities to increasing understanding and enjoyment of the National Park's natural and historic environment as part of tourism and recreation. However, the policies also recognise that Exmoor's natural and historic environment is central to the prosperity of the sector, so the conservation of these assets is given high priority.

1.47   There are generally positive or neutral implications in relation to **Air Quality and Water Resources**, **Land**, **Coast**, and **Climate Change and Adaptation to Flood Risk**. The policies promote sustainable tourism, which includes the protection and preservation of natural, cultural and social resources, minimising environmental impact and resource use, and taking account of changes in climate.

1.48   The policies should also be beneficial for the local **Community and Wellbeing**. Tourism and recreation are important sectors for providing local employment and also may help to sustain an improved range of services and facilities due to greater use of local products and services by visitors. Access to open spaces, tranquillity and the opportunities for recreation also help support health and wellbeing.

1.49   There are mixed implications for the **Economy and Employment** SA objective. Tourism and recreation are important to the local economy, and are closely linked to the attractiveness of the landscape, biodiversity and historic environment. However, proposals will only be permitted where they are compatible with National Park purposes, which would potentially preclude some types of development such as golf courses or major tourism developments. Some recreational activities are also limited as they are not considered to be appropriate in terms of the quiet enjoyment of the National Park, including motorised sporting activities and clay-pigeon shooting.

1.50   There are also mixed and uncertain implications in relation to **Climate Change Mitigation and Energy** and **Transport**. The majority of tourism and recreational activities and facilities on Exmoor are small scale, involving quiet enjoyment of the National Park including walking, cycling, and riding and so do not, on their own, negatively affect climate change emissions or transport. However, due to the rural nature of the National Park and limitations of public transport, much of the travel is by private car, and there may consequently be cumulative impacts although the policies seek to guard against this.

Summary of SA findings for Chapter 9 Achieving Accessibility for All

1.51   A number of changes to the policies in this section of the Local Plan have been made since the Publication Draft version in 2015, including clarification with regards to car parking provision and strengthening environmental protection with regard to wildlife and seascape character. Scores for SA Objectives 2 and 13 have changed from neutral (0) to positive (+) for policies AC-D5 and AC-D6 respectively.

1.52   The policies in this chapter are mainly very positive in relation to the SA objectives for **Transport**, **Community and Wellbeing**, **Climate Change Mitigation and Energy**, **Land**, **Air Quality and Water Resources** as they encourage travel by sustainable means of transport, whilst recognising the difficulties associated with this in a dispersed rural area such as Exmoor. The policies encourage a shift in

priority towards pedestrians, cyclists, horse riders and public transport and also opportunities for low carbon travel including installation of electric car charging points. The policies support the ongoing provision of public transport services, but given cuts in public funding, alternatives such as demand-responsive community transport initiatives and car-sharing clubs are also encouraged. Enhanced access to the public rights of way network is also encouraged. There are some areas of the National Park where traffic is an issue, particularly during the peak holiday season, and the policies require measures to minimise the adverse impacts of traffic in these circumstances. The telecommunications policies could have mixed effects, as the promotion of broadband and ICT will enable increased home working thus reducing the need to travel, as well as providing potential alternative ways of accessing services. However, there is already an increase in transport movements in terms of delivery vans from internet shopping, which are likely to be exacerbated as a result.

1.53 The policies are mainly positive for the SA topics of **Landscape**, **Biodiversity and Green Infrastructure**, and **Historic Environment** and seek to protect the character of Exmoor's roads, historic bridges and fords. Highway maintenance or improvement works are expected to be carried out to the highest environmental standards in keeping with local character and using materials and finishes appropriate to the built environment.

1.54 Exmoor is disadvantaged economically as it has no strategic road or rail corridors, which can hinder economic opportunities. Traffic and congestion including over demand for parking during peak tourism periods can be bad for business. The policies are broadly positive for the Economy and Employment, as they seek to support sustainable transport and accessibility, and to ensure that the benefits to the economy from improved digital communications and connectivity are realised. However, there are potentially negative effects from the policy approach to parking which only provides for community needs rather than peak parking which could reduce potential custom for local businesses, although temporary parking solutions can be sought.

Summary of SA findings for Chapter 10: Exmoor's Settlements

1.55 Following examination of the Publication Version of the Local Plan, policy ES-S2: Lynton and Lynmouth Neighbourhood Plan is proposed to be removed. The justification being that the policy should not prescribe the circumstances in which a decision-maker must give greater weight to one given set of development plan policies than to another.

1.56 ES-S1 is an enabling policy and does not have specific implications that can be assessed against the SA objectives. A summary of the SA findings for the other two policies in this chapter (ES-D1 and ES-D2) is provided below.

ES: D1: Wheddon Cross and Cutcombe Community Safeguarding Area

1.57 Safeguarding land for an extension to the school site and school playing field area would be positive for **Community and Wellbeing** as it would improve the facilities available at the village for community events and for sports and recreation.

1.58 Effects on **Transport** could be positive or negative depending on how the safeguarded land would be used – there are already traffic problems and parking shortages at the school; therefore use of the safeguarded land for additional parking could help relieve this issue although it may also encourage higher levels of car use rather than measures such as car sharing. Extension of the site could also result in

increased traffic generation associated with the school but this again depends on how the safeguarded land is to be used. For the same reasons effects on **Air Quality and Water Resources** and **Climate Mitigation and Energy** are also mixed.

1.59   While the potential future development of the safeguarded land could result in impacts on **Biodiversity and Green Infrastructure**, **Historic Environment**, **Land** and **Landscape**, impacts would depend largely on how the site is used which is not yet known. Other policies in the Local Plan would apply and should mitigate potential effects; therefore the policy is negligible for these SA themes.

1.60   There could be a negative effect on **Housing** if the safeguarding of this land were to prevent affordable housing development coming forward in that location.

1.61   Effects on the other SA themes would also be neutral.

ES-D2: Dulverton Community Safeguarding Area

1.62   Safeguarding land for an extension to the existing cemetery would be positive for **Community and Wellbeing** as the current cemetery is nearing capacity and would no longer be able to meet local needs.

1.63   Neutral effects are likely for most other SA objectives due to the specific nature of the proposal. There could, however, be a negative effect on **Housing** if the safeguarding of this land were to prevent affordable housing development coming forward in that location; however this should be counteracted by policies relating to housing provision in other parts of the Local Plan.

Overall Assessment of Local Plan against SA Topics, Cumulative Effects and Alternative Options

1.64   The likely effects of all the Local Plan policies including the Proposed Main Modifications on each SA topic are summarised below.

Air Quality and Water Resources

1.65   Overall the impacts of the Local Plan: Proposed Main Modifications on air quality and water resources are **either positive or neutral**. Air and water quality on Exmoor are generally good, and the levels of development are not likely to be of a sufficient scale to negatively impact on this. While in some popular tourism destinations increases in traffic during peak periods could result in air quality issues, safeguards are in place through policies such as CC-S7 Pollution and AC-S1 Sustainable Transport. There are also safeguards to prevent water pollution, for example in relation to agricultural slurry and wastes, and enhancements such as the remediation of contaminated land and other measures to improve the quality of the environment.

Biodiversity and Green Infrastructure

1.66   Exmoor has a wealth of wildlife, with nearly a third of the National Park protected under international or national designations for its wildlife value. The Local Plan: Proposed Main Modifications is generally **strongly positive** for biodiversity, geodiversity and green infrastructure, including the General Policies which apply to all development. There are also specific policies that protect wildlife and habitats, and encourage enhancements such as the provision of habitats and wildlife friendly

measures in developments including bat or bird boxes (CE-S3 Biodiversity and Green Infrastructure). The provision of green infrastructure such as natural habitats, amenity green spaces and wildlife corridors is also encouraged (CE-D2 Green Infrastructure Provision). The spatial strategy includes some settlements where there are protected wildlife areas, and development could be constrained in these areas as a result. A separate Habitats Regulations Assessment has been undertaken to consider the implications of the Local Plan: Proposed Main Modifications for internationally important habitats.

Climate Change and Adaptation to Flood Risk

1.67   This SA topic covers two SA objectives – minimising and managing flood risk, and minimising the impacts of climate change on Exmoor's communities and habitats. In many cases the policies would have the same effects on both SA objectives as they are closely related; hence being grouped into one SA topic.

1.68   Overall the Local Plan: Proposed Main Modifications is **either positive or neutral** in relation to climate change and flood risk. There are specific policies which encourage proposals to adapt to the consequences of climate change, including avoiding areas at risk of flooding, and promoting land management to reduce the risk of flooding (CC-S1 Climate Change Mitigation and Adaptation, CC-D1 Flood Risk). Many of Exmoor's heritage assets are vulnerable to climate change, and safeguards are included in the policies to enable measures that allow heritage assets to adapt, providing these changes do not cause inappropriate or damaging alterations (CE-D3 Conserving Heritage Assets). Some communities are at risk from coastal change, particularly Porlock Weir, so there is flexibility in the Local Plan to enable to respond to this in a planned way (CC-S4 Replacement Development from Coastal Change Management Areas, CC-S3 Porlock Weir Coastal Change Management Area). The spatial strategy (GP3) includes some settlements where there are areas at risk of flooding, and development could be constrained in these areas as a result.

Climate Change Mitigation and Energy

1.69   The Local Plan: Proposed Main Modifications is **mainly positive or neutral** in relation to climate change mitigation and energy, although there are some mixed or unknown potential effects. Future changes in climate are likely to affect all aspects of the National Park – its natural beauty, wildlife and cultural heritage, the special qualities that people visit to enjoy and understand, and effects on local communities and economic activity. The main sources of emissions of greenhouse gases on Exmoor related to development are from energy and transport, principally arising from the burning of fossil fuels for domestic heating, commercial sectors and vehicle movements. While some of these impacts are not within the control of the planning system, the Local Plan includes policies and measures to seek to reduce carbon emissions including through reducing the need to travel, encouraging energy efficiency and appropriate low carbon/renewable energy technologies, and supporting carbon storage. However, the implementation of these policies could be limited by the protection of the National Park's special qualities for example in relation to renewable energy, and also the rural nature of National Park and dispersed settlement pattern which, along with the limitations of public transport provision, mean that a significant proportion of journeys are likely to be made by private car. There **could also be potential negative impacts** from tourism and recreation development which attracts significant additional numbers of visitors

leading to increased greenhouse gas emissions from traffic, **or cumulative impacts** arising from more intensive use or larger scale developments. However, there are policy safeguards against such impacts and overall levels of development within the National Park are likely to be low. Consequently it is not considered likely that there will be significant increases in carbon emissions as a result of implementing the Local Plan.

Community and Wellbeing

1.70   The Local Plan: Proposed Main Modifications is **strongly positive** for the local community, supporting affordable housing for local people, employment opportunities, community services and facilities, and a high quality natural and built environment. Whilst overall levels of development will not be high, the Local Plan introduces additional flexibility for development to help maintain thriving communities, for example through the provision of affordable housing including accessible and adaptable housing and extended family dwellings. Policies to support open spaces and access to recreation will help encourage healthy lifestyles, and protecting the tranquillity of the National Park will also contribute to wellbeing. The settlement strategy includes a wide range of settlements to enable communities to meet their needs and also where possible to support the maintenance of services and facilities. Policies supporting improvements to telecommunications and utilities infrastructure including access to broadband technology and enhanced mobile phone coverage are also positive in providing necessary services for local communities whilst seeking to minimise impacts on the special qualities of the National Park. The effects in relation to community benefits from renewable energy are uncertain; whilst the policies support schemes that provide benefits for communities in principle, there could still be some limitations to the scale of such schemes due to environmental protection.

Economy and Employment

1.71   The Local Plan: Proposed Main Modifications is **positive** for the economy and employment as it seeks to encourage development which will help strengthen and diversify the Exmoor economy and sustain the high quality environment of the National Park. The economy is largely driven by the tourism and agriculture sectors, which are also closely linked to protection and enhancement of the National Park. Development therefore needs to be appropriate in terms of its location, scale and type to ensure that it adds to the special qualities of the National Park rather than detracting from it. There will consequently be **mixed** sustainability effects of some policies, for example large scale development will be constrained within the National Park, potentially limiting employment and economic development, but this will help to protect the natural beauty, wildlife and cultural heritage and therefore maintain the assets that attract people to visit and enjoy the National Park.

Historic Environment

1.72   Exmoor has a rich cultural heritage and a valued historic environment comprising a range of historic settlements, buildings and landscapes which together make up Exmoor's 'heritage assets'. The Local Plan: Proposed Main Modifications is generally **strongly positive** for cultural heritage and the historic environment, particularly the General Policies which apply to all development. There are also specific policies to conserve and enhance cultural heritage and the historic environment (CE-S4 Cultural Heritage and Historic Environment, CE-D3 Conserving

Heritage Assets), including measures to bring heritage assets that are redundant or at risk back into viable use, providing this is consistent with their conservation. The spatial strategy includes some settlements where there are significant heritage assets, including a number of Conservation Areas, and development could be constrained in these areas as a result.

Housing

1.73 The housing SA objective and criteria were identified in recognition of the lack of affordable housing on Exmoor. There are specific policies to support the delivery of affordable housing to meet local needs; however the approach is not to allocate sites or set housing targets. Policy MI-S1 will ensure attention is paid to the monitoring of affordable housing needs, to ensure that the indicative level of need for affordable housing is provided to meet local communities' housing needs. The delivery of affordable housing is on an 'exception site' basis across the National Park in accordance with identified local affordable needs in an area. The focus is on providing for local needs affordable housing, either through new build or conversions, with the potential for a limited element of market housing (controlled by a mechanism which ensures that can be lived in by anyone but only as their principal residence) where it can be demonstrated as a requirement to enable delivery of affordable housing which cannot be made financially viable without it. Focusing on local needs affordable housing will **generally be positive** for the SA objective, as this is where the need has been demonstrated. However, as the approach is needs led, there are unlikely to be significant numbers of new housing (either new build or conversions), leading to **some mixed or uncertain effects** in relation to the sustainability objectives. The location and amount of housing may be constrained by protection of the natural and historic environment in some cases, as well as consideration of flood risk, as a number of settlements have areas at risk of flooding.

Land

1.74 This SA topic covers two SA objectives – to promote sustainable development and the sustainable use of natural resources, and to reduce waste and promote reuse and recycling. In many cases the policies would have the same effects on both SA objectives as they are closely related; hence being grouped into one SA topic.

1.75 The Local Plan: Proposed Main Modifications is **generally positive** in relation to land. One of the key considerations has been the limited capacity for development due to constraints of topography, landscape and so on and therefore the approach taken is to ensure that the best use is made of the limited supply of suitable land (GP4 The Efficient Use of Land and Buildings). The only exception to this is principal residence housing, where it is demonstrated that an element of market housing is required to cross-subsidise the delivery of local affordable housing, which could require additional land-take. The approach to promoting the use of existing buildings will also help to reduce land-take for new development. There is recognition that large scale development (including mineral extraction) will not be appropriate in the National Park given its designation, and this will also help to safeguard land.

Landscape

1.76 Exmoor was designated for its natural beauty and the conservation and enhancement of landscape quality is fundamental element of the Local Plan:

Proposed Main Modifications. The policies are **generally very positive** for landscape, including the General Policies which apply to all development. There are also specific policies that protect landscape character and tranquillity, particularly Exmoor's dark night sky as the National Park is designated a Dark Sky Reserve (CE-S1 Landscape and Seascape Character, CE-S2 Protecting Exmoor's Dark Night Sky). The approach to housing, employment and development is influenced, and in some cases may be constrained by, the capacity of the landscape to accommodate development. This has also influenced the identification of settlements, informed by the Landscape Sensitivity Study. The settlements identified in the spatial strategy have some capacity for development, but in some cases this may be limited to only affordable housing to meet the parish's own needs due to landscape sensitivity. The policy approach of promoting the reuse of existing buildings will also help to minimise visual impacts and detrimental changes to landscape character.

Coast

1.77   Exmoor's wild undeveloped coast with dramatic high cliffs and headlands are highly important for their scenery, wildlife and sense of tranquillity and remoteness. The Local Plan: Proposed Main Modifications is **positive** in relation to protecting and enhancing coastal areas. The Heritage Coast is identified in policy CE-D1 and CE-S1 requires landscapes and seascapes to be conserved and enhanced. As a result of these policies, the coastal landscape character types identified in the Landscape Character Assessment will inform policy and development management decisions, including impacts on seascapes. There are specific policies within the Local Plan to direct development away from vulnerable coastal areas and to protect coastal communities, particularly those such as Porlock Weir that are at risk of coastal change due to sea level rise (CC-S2 Coastal Development, CC-S3 Porlock Weir Coastal Change Management Area).

Transport

1.78   The rural nature of the National Park and its dispersed population and settlement pattern pose challenges in terms of reducing the need to travel and encouraging more sustainable modes of transport and therefore the overall effects of the Publication Draft Plan are **mixed**. Levels of traffic on Exmoor are not generally problematic, although there are localised problems of congestion and parking in some settlements during peak holiday periods. The Local Plan: Proposed Main Modifications seeks to encourage sustainable transport and reduce the need to travel through specific policies (AC-S1 Sustainable Transport, AC-S3 Traffic Management and Parking) and also the spatial strategy (GP3), with the local services centres identified as the most suitable places for development to consolidate employment, housing and services. Some of the villages identified also function collectively by sharing their facilities, and a number are served by public transport. The smaller rural communities identified may have opportunities for limited development to sustain the local community over the long term.

1.79   Overall levels of development in the National Park are likely to be limited, and so the cumulative impacts on transport are not considered to be significant. The only caveat could be in relation to tourism and recreation development if a new attraction draws in significant numbers of visitors, or more intensive use of existing facilities causes increased traffic, but this would need to be carefully assessed through a Travel Assessment or Statement, and if necessary a Travel Plan. The measures in

the Local Plan to facilitate home working and improve broadband provision will help to reduce the need to travel.

Cumulative Effects

1.80   As well as identifying the effects of the individual policies in the Local Plan: Proposed Main Modifications an important part of the SA process is to assess how those individual effects interact with one another, in order to identify whether there are any cumulative effects that may result from implementation of the Plan.

1.81   The combined effects of the policies and spatial strategy (GP3) are likely to result in a beneficial effect on the protection of the **Landscape**, **Biodiversity and Green Infrastructure**, **Historic Environment** and **Land**. The cumulative impact of development could erode the character of the landscape and historic environment but policies in the Local Plan: Proposed Main Modifications will ensure that a robust approach is taken to their protection, and that enhancement is achieved where possible. The Landscape Sensitivity Study has also ensured that there is some capacity for development in all the named settlements identified in the spatial strategy. The focus on re-using existing buildings and the provision of affordable (rather than market) housing will also reduce land-take.

1.82   Policies on tourism, recreation, green infrastructure, and community facilities are likely to work in conjunction with each other to have a cumulative beneficial effect on the provision and access to public open space, and will also encourage healthy lifestyles and therefore benefit **Community Wellbeing**. There may be cumulative impacts arising from more intensive recreation and tourism use or larger scale developments - for example, large scale proposals could generate significant levels of traffic, which potentially would lead to increased greenhouse gas emissions. However, the plan guards against cumulative impacts and requires that the location, scale and intensity of use is appropriate in relation to the National Park designation and achievement of its statutory purposes.

1.83   It is anticipated that there will not be any significant cumulative effects on **Air Quality and Water Resources**, **Climate Change Mitigation and Energy**, the **Coast**, or **Transport**.

Recommendations

1.84   A small number of recommendations for the Local Plan policies and supporting text were made in relation to a draft version of the Publication Draft Local Plan in 2015. These recommendations are set out in **Table 2** below along with a summary of how they were addressed in the final version of the Publication Draft Local Plan (as submitted for examination). No further recommendations are considered necessary from the SA of the Proposed Main Modifications.

Table 2: Summary of recommendations made in the SA and how they have influenced the Publication Draft Local Plan

Recommendations	How recommendation was addressed in the Publication Draft Local Plan (2015)
Strategic priority 3 - It is recommended that the wording of the strategic priority is amended to address the potential for impacts on the landscape.	The strategic priority now requires agricultural and forestry development to be 'appropriate'.
GP3: Spatial Strategy - It is recommended that reference to flood risk is reinserted into the spatial strategy policy.	Policy GP3 now makes reference to the need to avoid development in areas at risk of flooding.
CE-S2: Protecting Exmoor's Dark Night Sky - It is recommended that reference is added to the policy or supporting text to the potential impacts of lighting on the historic environment and the need to consider the potential impacts on historic buildings and to bring about enhancements where possible.	The supporting text to the policy now refers to this issue.
CC-S7: Pollution - It is recommended that the supporting text to the policy makes reference to the potential impacts of diffuse pollution and sewage on bathing water.	The supporting text to the policy now refers to this issue.
HC-S7: Residential Institutions - It is recommended that either the policy or the supporting text makes reference to the need to avoid development of this nature in areas of high flood risk, as well as other considerations relating to climate change adaptation.	The policy now refers to climate change mitigation and adaptation with particular reference to flood risk.
HC-S7: Residential Institutions - It is recommended that the policy encourages sustainable resource consumption and the use of renewable of energy.	This recommendation is now included in the supporting text to the policy.
SE-S4: Agricultural and Forestry Development - It is recommended that the supporting text to the policy makes reference to the changes in agriculture and forestry that may occur due to climate change and the associated mitigation measures.	The supporting text now makes reference to these issues.
RT-D10: Recreational Development - It is recommended that the links between	The supporting text to the policy now recognises these benefits.

Recommendations	How recommendation was addressed in the Publication Draft Local Plan (2015)
recreational development and the potential benefits for the local community are recognised in the supporting text to the policy.	
AC-S1: Sustainable Transport - It is recommended that the supporting text to the policy refers to the increased opportunities for walking, cycling etc. that would result from enhanced green infrastructure provision, cross referring to policy CE-S3: Biodiversity and Green Infrastructure.	The supporting text now includes this reference.
Chapter 10: Exmoor's Settlements - It is recommended that the relevant settlement descriptions in Chapter 10 of the Local Plan make reference to European designated sites that are in close proximity.	Chapter 10 now makes reference to European sites near to the relevant settlements.

Monitoring

1.85   Ongoing monitoring will be important to ensure that implementation of the Local Plan does not cause any unforeseen sustainability impacts, and to enable any actual impacts to be identified and addressed. The indicators that will be used to monitor the impact of the Plan are shown in the SA framework (see **Table 1**).

Mitigation Measures

1.86   A small number of negative effects have been identified through the SA of the Local Plan: Proposed Main Modifications, many of which will be able to be mitigated through the implementation of other Local Plan policies. In some cases, these have been identified as part of a mixed overall effect where positive impacts could also occur in relation to the same SA topic. The SA topics for which potential negative effects have been identified are listed in **Table 3** below, along with the relevant Local Plan policies which may provide mitigation.

Table 3: SA topics against which potential negative effects identified and mitigation measures

SA topic	SA objectives	Local Plan policies providing potential mitigation
Air quality and water resources	To minimise air pollution (including greenhouse gas emissions) and water pollution and ensure air and water quality is maintained or improved.	CC-S7 Pollution AC-S1 Sustainable Transport
Climate	To minimise the net emissions of	CC-S1 Climate Change

SA topic	SA objectives	Local Plan policies providing potential mitigation
change mitigation and energy	carbon dioxide and other greenhouse gases into the atmosphere and to minimise Exmoor's contribution to global climate change.	Mitigation and Adaptation CC-S5 Low Carbon and Renewable Energy Development CC-D3 Small Scale Wind Turbines CC-D4 Freestanding Solar Arrays
Economy and employment	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.	SE-S1 A Sustainable Exmoor Economy SE-S2 Business Development in Settlements SE-S3 Business Development in the Open Countryside SE-D1 Home Based Businesses SE-D2 Safeguarding Existing Employment Land and Buildings SE-S4 Agriculture and Forestry Development
Housing	To help ensure that National Park communities have access to appropriate, good quality, sustainable, affordable housing.	HC-S1 Housing HC-S2 A Balanced Local Housing Stock CE-S6 Design and Sustainable Construction Principles
Land	To promote sustainable forms of development and sustainable use of natural resources.	GP4: The Efficient use of Land and Buildings CE-S6 Design and Sustainable Construction Principles
	To reduce all forms of waste production and promote reuse and recycling and minimise the risk of contaminated land.	CC-S6 Waste Management CC-D5 Sewerage Capacity and Sewage Disposal CC-S7 Pollution
Landscape	To protect, maintain and enhance the special qualities of the Exmoor National Park's landscape character.	CE-S1 Landscape and Seascape Character CE-D1 Protecting Exmoor's Landscapes and Seascapes
Coast	To protect and/or enhance coastal areas	CE-S1 Landscape and Seascape Character CE-D1 Protecting Exmoor's Landscapes and Seascapes CC-S2 Coastal Development
Transport	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	AC-S1 Sustainable Transport AC-S2 Transport Infrastructure

SA topic	SA objectives	Local Plan policies providing potential mitigation
	Exmoor.	

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