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

Sustainability Appraisal Report

Prepared by LUC
December 2016

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Client: Exmoor National Park Authority

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1 Introduction

The Sustainability Appraisal Report

- 1.1 Exmoor National Park Authority (ENPA) is preparing its Local Plan¹ which will guide development in the National Park to 2031. The Local Plan is a planning document that sets out the overall vision and objectives for the National Park and provides a spatial strategy and policies that will guide how these will be achieved. The overall aim of the Local Plan is to ensure that any new development will help to achieve the National Park purposes and deliver sustainable development.
- 1.2 The Local Plan includes both strategic policies and development management policies. It has to be set within national planning policy, as set out in the National Planning Policy Framework (NPPF). The NPPF states that the purpose of planning is to help achieve sustainable development, with three integrated elements – an economic role, a social role and an environmental role.
- 1.3 The National Park Authority is required to test the emerging Local Plan against a set of sustainability objectives, to consider the implications of the proposed policies and strategy against social, economic and environmental criteria. This Sustainability Appraisal (SA) report fulfils the requirements of the European Strategic Environmental Assessment (SEA) Directive. A separate Appropriate Assessment required under the Habitats Regulations has also been undertaken².
- 1.4 The process of SA and SEA aims to promote sustainable development through better integration of sustainability considerations in the preparation and adoption of plans. The SA has therefore been undertaken as an integral part of the preparation of the Local Plan, and has influenced the policies and strategy.

National Park statutory purposes and duty

- 1.5 The statutory purposes of National Parks are set out under the National Parks and Access to the Countryside Act 1949, as amended by the Environment Act 1995, these are:
to conserve and enhance the natural beauty, wildlife and cultural heritage (of the National Parks); and
to promote opportunities for the understanding and enjoyment of the special qualities (of the National Parks) by the public.
- 1.6 The National Park Authority's primary responsibility is to deliver the statutory purposes. In doing so, it is expected to be an exemplar in achieving sustainable development, helping rural communities in particular to thrive. In pursuing National Park purposes, National Park Authorities have a duty to “*seek to foster the economic and social well-being of local communities within the National Park and shall for that purpose co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the area of the National Park*”. Within the Parks, conserving and enhancing the landscape,

¹ Previously referred to as the Local Development Framework.

² Exmoor National Park Publication Draft Local Plan 2011-2031 Habitat Regulations Assessment April 2015

biodiversity, cultural heritage, dark skies and natural resources, and promoting public understanding and enjoyment of these should lie at the very heart of developing a strong economy and sustaining thriving local communities³.

- 1.7 Section 62 of the Environment Act also requires all relevant authorities to “*have regard to the statutory purposes in exercising or performing any functions in the National Park and; if it appears that there is a conflict between those purposes, to attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area,*” known as the ‘Sandford Principle’.

³ UK Government Vision and Circular English National Parks and the Broads, Defra, 2010

2 Methodology

Approach

- 2.1 The Sustainability Appraisal has been carried out by external consultants in consultation with ENPA staff and members. Clare Reid Consultancy carried out the SA work for the Local Plan up to and including the 2013 Draft Local Plan consultation – the SA Report for the Draft Local Plan was published in October 2013⁴. LUC was commissioned to update that SA Report to address the potential effects of the 2015 Publication Draft Local Plan and has now updated the SA Report to address the proposed Main Modifications (December 2016) following the examination hearing sessions for the Publication Draft Local Plan. The SA is required by government through legislation and is subject to the same level of public consultation and scrutiny as the Local Plan.

- 2.2 There are a number of stages required for the SA as shown in **Figure 2.1**, and how these have been addressed is set out below:

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

- 2.3 A Scoping Report⁵ was produced, setting out what the SA should cover, providing a baseline of the environmental, social, and economic characteristics of Exmoor, reviewing a wide range of policy documents, monitoring and evidence, and identifying the key sustainability issues affecting Exmoor. A SA framework was developed, with a set of sustainability objectives and criteria to guide the preparation of the draft Plan. The Scoping Report was subject to public consultation in 2010.

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

- 2.4 In preparing the Local Plan, a broad range of options and alternatives were considered by ENPA. This included options for where development could go, alternatives for how affordable housing could be delivered, and the policy approaches that would help deliver sustainable development on Exmoor. The options were subject to SA⁶ and a public consultation took place.

Phase 3 – assessing the Draft Plan & consulting on the Draft Plan and Sustainability Report (2013)

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

Phase 4 – Publication of the Plan and Sustainability Report (2015)

- 2.6 The results of the consultation on the 2013 Draft Local Plan were taken into account and the Local Plan was amended in the light of this, resulting in the Publication Draft

⁴ Sustainability Appraisal for the Exmoor National Park Draft Local Plan, Clare Reid Consultancy (2013)

⁵ Sustainability Appraisal Scoping Report, Exmoor National Park Authority (2010)

⁶ Sustainability Appraisal for the Local Plan Vision, Objectives, General Policies and Strategic Options, Clare Reid Consultancy (2011)

version. ENPA published that version of the Plan for formal consultation along with the Sustainability Appraisal Report in 2015.

- 2.7 A number of recommendations for changes or additions to the Publication Draft Local Plan were made in a draft version of the SA report. The following chapters summarise the recommendations that were made and how they were addressed in the Publication Draft Local Plan.

Phase 5 – Submission and Public Examination

- 2.8 After it was submitted by ENPA to the Secretary of State for Examination, the Local Plan and consultation responses were considered by a Planning Inspector and a public examination was held. ENPA subsequently prepared a schedule of Proposed Main Modifications to the Local Plan, at the request of the Inspector, taking into account the debate held during the Examination in Public. The schedule of Proposed Main Modifications has been assessed to determine whether the modifications to the Local Plan would change any of the previous SA findings (as presented in **Appendix 5** of this SA Report), and **Chapters 6 to 14** of this SA Report have been updated to reflect those changes where relevant. This SA Report will be made available for consultation alongside the schedule of Proposed Main Modifications.

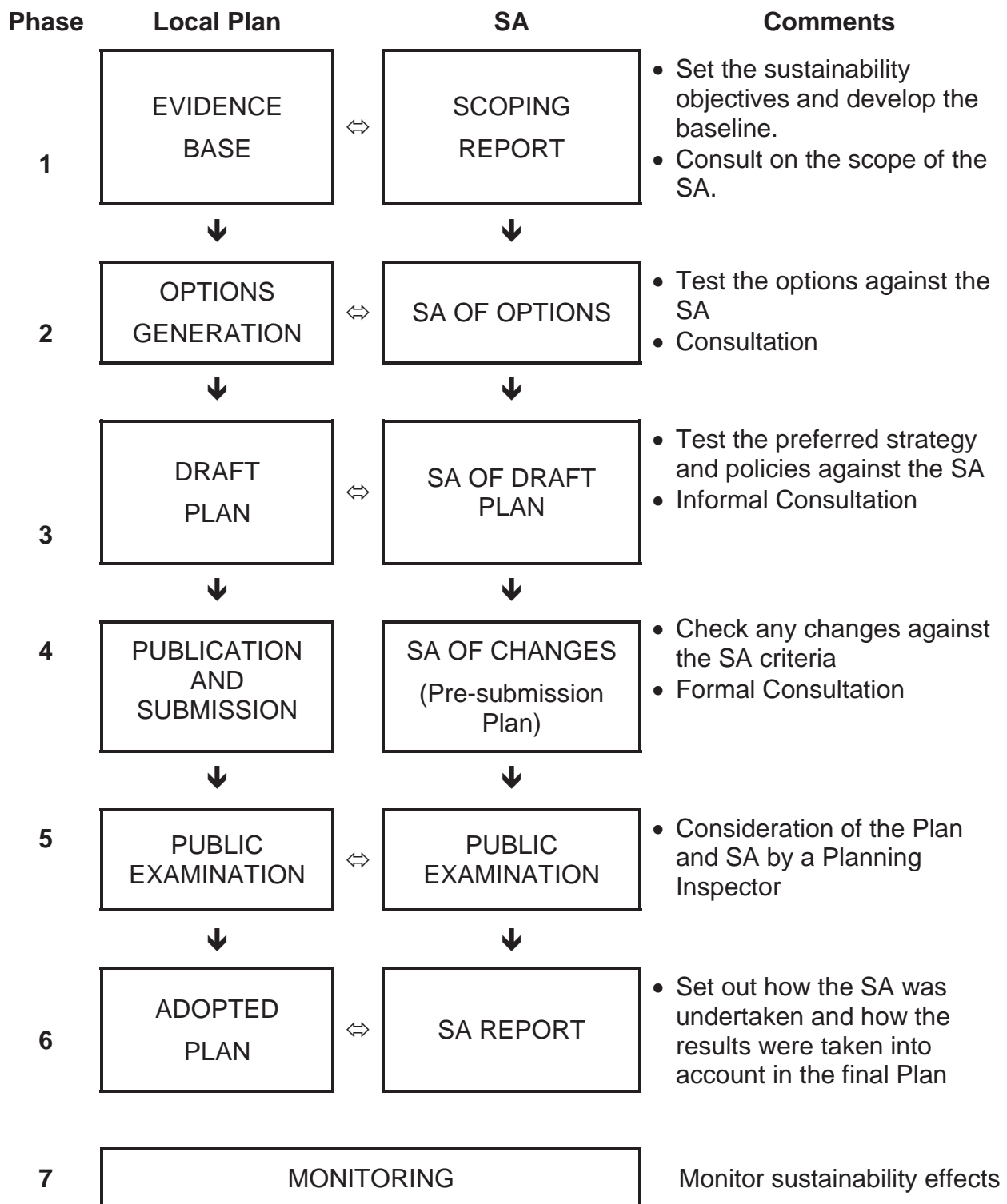
Phase 6 – Adoption of the Local Plan

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

Phase 7 - Monitoring implementation of the adopted Plan.

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

Figure 2.1: Summary of key stages in the Local Plan process and SA



The Sustainability Appraisal Framework

2.11 The Scoping Report provides a framework for undertaking the SA as the Local Plan 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.
- An assessment of the situation likely to arise without the Local Plan.

- A summary of relevant policies, plans, programmes and objectives which inform the Local Plan.
 - Sustainability objectives for a combined SEA/SA framework which forms the basis for appraisal of the Local Plan as it is prepared.
 - Appropriate monitoring indicators that meet the requirements of SA/SEA.
- 2.12 The baseline information for Exmoor National Park has been updated as part of the preparation of this updated SA Report, and can be found in **Appendix 1**.
- 2.13 The Scoping report sets out a series of topics to provide a framework for producing the SA:
- 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
- 2.14 For each topic, a set of sustainability objectives and criteria were identified to test the emerging Local Plan against, and indicators for monitoring the effect of implementing the Plan. The full SA framework is set out in **Appendix 3**. The SA framework covers the topics listed in Annex 1 of the SEA Directive - biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, and landscape. A table setting out how the SA meets the requirements of the SEA Directive is presented in **Appendix 4**.
- 2.15 Each Local Plan policy has been assessed against the topics and objectives in the SA framework, using the criteria listed in **Appendix 3**, and given an overall score. The scoring system is set out in **Figure 2.2** below.

Figure 2.2: 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

2.16 During earlier stages of the SA the emerging policies were appraised against each of the 12 SA topics, most of which only cover one SA objective. However, as two of the topics (climate change adaptation & flood risk, and Land) each cover two SA objectives, during the SA of the Publication Draft Local Plan the policies were scored against all 14 SA objectives for completeness.

Consultation

2.17 The results of the SA have been subject to public consultation throughout the process of developing the Plan. The three statutory bodies (Environment Agency, Natural England and Historic England (previously English Heritage)) are also consulted. The consultation documents are available on the website at www.exmoor-nationalpark.gov.uk and at publicised locations.

2.18 Consultation responses that were received in relation to the SA Report for the Draft Local Plan in 2013 are set out in **Appendix 2** along with a description of how they were addressed in the subsequent SA reports. No specific representations were received relating to the 2015 SA Report for the Publication Draft Local Plan.

3 Sustainability Baseline and Key Issues

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

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

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

3.3 The detailed baseline information for Exmoor National Park is presented in **Appendix 1** and has been updated since it was originally presented in the 2010 SA Scoping Report.

Review of policy context

3.4 Exmoor's Local Plan is not prepared in isolation, being greatly influenced by other plans, policies and programmes and by broader sustainability objectives. It needs

to be consistent with international and national guidance and strategic 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. It must also conform to environmental protection legislation and the sustainability objectives established at an international, national and regional level.

Key international plans, policies and programmes

- 3.5 At the international level, Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive') and Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive') are particularly significant as they require SEA and Habitats Regulations Assessment (HRA) to be undertaken in relation to the emerging Exmoor Local Plan. These processes should be undertaken iteratively and integrated into the production of the plan in order to ensure that any potential negative environmental effects (including on European-level nature conservation designations) are identified and can be mitigated.
- 3.6 There are a wide range of other EU Directives relating to issues such as water quality, waste and air quality, most of which have been transposed into UK law through national-level policy.

Key national plans, policies and programmes

- 3.7 The most significant development in terms of the policy context for Exmoor's Local Plan has been the publication of the National Planning Policy Framework which replaced the suite of Planning Policy Statements (PPSs) and Planning Policy Guidance (PPGs) that previously existed. The purpose of the NPPF was to streamline national planning policy. The Local Plan must be consistent with the requirements of the NPPF. The NPPF sets out information about the purposes of local plan-making, stating that:
- "Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in this Framework, including the presumption in favour of sustainable development."*
- 3.8 The NPPF also requires Local Plans to be 'aspirational but realistic'. This means that opportunities for appropriate development should be identified in order to achieve net gains in terms of sustainable social, environmental and economic development; however significant adverse impacts in any of those areas should not be allowed to occur.
- 3.9 The NPPF requires local planning authorities to set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:
- the homes and jobs needed in the area;
 - the provision of retail, leisure and other commercial development;
 - the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
 - the provision of health, security, community and cultural infrastructure and other local facilities; and
 - climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

3.10 In addition, Local Plans should:

- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;
- be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;
- be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;
- indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
- allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
- identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
- identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
- contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.

Local plans, policies and programmes

3.11 Exmoor National Park lies approximately two thirds within West Somerset District and one third in North Devon District, with part of the south-eastern boundary adjoining Mid Devon District. West Somerset and North Devon are producing their own Local Plans which cover the parts of those districts that lie outside of the National Park. Therefore, while Exmoor National Park is covered by its own Local Plan, there are particularly strong links with the neighbouring authorities' plans.

- West Somerset Council adopted their Local Plan in November 2016. The West Somerset Local Plan to 2032 includes provision for the development of 2,900 homes up to 2032. Major employment site allocations were proposed at sites at Minehead and Williton, which are just outside the National Park boundary.
- North Devon District Council is preparing a joint Local Plan with neighbouring Torridge District Council. The Councils consulted on the Publication Draft version in June 2014, which is due to be adopted Spring 2017. The Schedule of Proposed Main Changes to the Plan published in May 2015 provided for the development of 17,220 dwellings along with the provision of a minimum of 85.1ha of land for economic development up to 2031. There are no major site allocations proposed near to the boundary of the National Park.

3.12 Exmoor National Park Authority produced a Duty to Co-operate Statement in May 2016 which described how it has worked collaboratively with other councils, public bodies and other organisations to identify the spatial strategy for the Local Plan and to develop strategic policies. Cross-boundary working is already a fundamental principal for the National Park Authority, as Exmoor comprises parts of both West Somerset and North Devon Districts. There is close working between the authorities with regards to issues including housing, economic development and environmental health, as well as with Devon and Somerset County Councils in

relation to their roles as mineral and waste planning authorities and education and highways authorities.

- 3.13 A range of measures have been employed to achieve cross-boundary working during the preparation of the Local Plan including joint evidence preparation, including in relation to housing and land availability assessments, and consultation with neighbouring authorities on the emerging Local Plan. These measures are described in full in the Duty to Co-operate Statement⁷.

⁷ Exmoor National Park Authority (2016) Duty to Cooperate Statement May 2016

4 Summary of Key Sustainability Effects of the Publication Draft Local Plan

- 4.1 Exmoor is designated as a National Park due to its high quality natural beauty, wildlife and cultural heritage. It has two statutory purposes to conserve and enhance those assets, and to enable people to understand and enjoy them. These purposes are supplemented by a duty to support the wellbeing of local communities and local economic development. The Local Plan is a key mechanism for delivering these purposes and duty, and consequently the sustainability objectives feature strongly throughout the Local Plan.
- 4.2 The potential sustainability effects of the Publication Draft Local Plan including the Proposed Main Modifications have been assessed using the SA objectives and criteria. A summary of the main effects is given in **Table 4.1** below, which shows that the Publication Draft Local Plan including the Proposed Main Modifications is likely to have more positive effects than negative effects. The full assessment is detailed in the following chapters.

Table 4.1: Summary of Key Sustainability Effects

+ Likely positive effects

- The focus on the provision of local needs affordable housing will support local communities and businesses.
- Positive for inclusive communities through provision of accessible and adaptable housing for older people, those with disabilities and other specific needs.
- Additional flexibility to change between uses of buildings which could help to provide additional affordable housing, or support local businesses and jobs.
- Positive for conservation and enhancement of the landscape, seascape, tranquillity and natural beauty of the National Park.
- Positive for protection and enhancement of wildlife and the natural environment including through the provision of habitats, open spaces, and other measures which strengthen ecological networks.
- Positive for the historic and built environment including flexibility in the use of traditional buildings to support their maintenance and bring some back into viable use.
- Supporting the local economy through encouraging local employment including home based businesses.
- Positive cumulative effects for tourism and recreation through diversification and flexibility to allow change of use, supporting the local economy and enjoyment of the National Park.
- Support for broadband and other telecommunications will be positive for

Table 4.1: Summary of Key Sustainability Effects

local communities and businesses.

+/- Uncertain or mixed effects

- The relatively limited capacity of greenfield land for affordable housing could be used up at a faster rate due to cross-subsidy from market housing in certain circumstances.
- Uncertain delivery of affordable housing due to public funding cuts and viability of schemes, although measures are in place to address this including cross-subsidy by market housing.
- The Plan does not allocate employment sites as evidence does not suggest need for this, with uncertain effects on jobs and businesses, although a flexible approach to support appropriate business development is encouraged.
- Renewable energy is positive for climate change mitigation and local communities but its scope may be limited in the National Park to avoid impacts on landscape and historic environment.

- Likely negative effects

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

5 Exmoor Local Plan Vision, Strategic Priorities and Objectives

Links to the Exmoor National Park Management Plan

- 5.1 National Park Authorities are required to produce a Management Plan and keep it updated every five years. This is a strategic Plan for the National Park as a whole, not just for the National Park Authority, and in recognition of the importance of working together with a wide range of partners to deliver the Plan, it was updated in 2012 as the Exmoor National Park Partnership Plan. As the Partnership Plan and Local Plan are two important strategic 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.
- 5.2 The joint Vision and Objectives were developed and consulted on between November 2011 and January 2012 alongside the strategic options for the Local Plan. The consultation was accompanied by a Sustainability Appraisal report⁸ in which the Vision and Objectives were appraised jointly with policy GP1. A separate SA was carried out of the Exmoor National Park Partnership Plan 2012-17, using the same SA framework for consistency⁹.
- 5.3 The SA of the joint Vision and Objectives in 2011 made a number of recommendations which resulted in some amendments being made to the Vision and Objectives. No further changes to the Vision and Objectives have been made since then; however as they were originally subject to SA jointly with policy GP1, an appraisal of the Vision and Objectives specifically is presented in **Table 5.1** overleaf for completeness.
- 5.4 **Table 5.1** also includes an appraisal of the strategic priorities that were presented in Chapter 2 of the Publication Draft Local Plan: Vision, Objectives and Strategic Priorities as they were new and had not previously been subject to SA. No changes have been proposed through the Main Modifications to the Vision, Objectives and Strategic Priorities, therefore the SA findings remain unchanged.

⁸ Sustainability Appraisal Report – Local Plan Vision, Objectives, General Policies and Options, Clare Reid Consultancy for Exmoor National Park Authority (2011)

⁹ Sustainability Appraisal Report – Exmoor National Park Partnership Plan, Clare Reid Consultancy for Exmoor National Park Authority (2012)

Table 5.1 Summary score for Local Plan Vision, Objectives and Strategic Priorities

SA Topics	SA Objectives	Vision	Objectives																					Strategic Priorities			
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	1	2	3	4
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.	++	+	0	0	0	0	+	++	0	+	0	0	0	0	0	0	0	+	++	+	++	0	++	0	0	
Biodiversity and green infrastructure	2) To conserve and enhance biodiversity and to protect, conserve and enhance all habitats and species.	++	+	+	++	++	0	0	+	0	+	0	0	0	0	0	++	0	+	0	+	0	++	+	0	0	
Climate change and adaptation to flood risk	3) To minimise and manage the risk of all forms of flooding.	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	0	0	++	0	0	
	4) To minimise the impacts of climate change on Exmoor's communities and habitats.	++	+	0	0	0	0	+	++	0	+	0	0	0	0	0	0	0	+	++	++	+	0	++	0	0	

SA Topics	SA Objectives	Objectives																				Strategic Priorities						
		Visi																										
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.	++	+/-	+	0	0	-	0	0	+	0	+	+	0	+	++	+	++	++	0	0	0	0	++	+	++	++	
Historic environment	8) To maintain and enhance the quality of the built environment.	++	+	0	0	0	++	++	0	0	0	0	+	+	0	0	0	0	+	0	0	0	-	0	++	0	0	0
Housing	9) To help ensure that National Park communities have access to appropriate, good quality, sustainable, affordable housing.	+	0	-	0	0	-	0	0	0	0	0	++	++	0	0	0	0	0	0	0	0	0	0	++	0	0	

SA Topics	SA Objectives	Objectives																			Strategic Priorities							
		Visi																										
Land	10) To promote sustainable forms of development and sustainable use of natural resources.	++	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	++	0	0	0	
	11) To reduce all forms of waste production and promote reuse and recycling and minimise the risk of contaminated land.	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Landscape	12) To protect, maintain and enhance the special qualities of the Exmoor National Park's landscape character.	++	++	++	+	0	++	0	0	0	0	0	+	+	0	0	++	0	++	0	0	-	0	++	0	0	0	
Coast	13) To protect and/or enhance coastal areas.	+	+	0	+	0	+	0	0	0	0	0	+	+	0	0	+	0	+	0	0	0	+/-	0	+	++	0	0

Vision

- 5.5 Given that the vision, objectives and strategic priorities of the Local Plan are aspirational and present a high level view of how the National Park Authority wishes Exmoor to look by 2031 it is unsurprising that broadly positive effects were identified for the SA topics.
- 5.6 Strongly positive scores were recorded for eight out of the fourteen SA topics: **air quality and water resources, biodiversity and green infrastructure, climate change and adaption to flood risk, climate change mitigation and energy, economy and employment, historic environment, land, and landscape**. The Vision is aspirational and presents the National Park in 2031 as a place where these issues are directly addressed.
- 5.7 The vision also scored positively against the SA topics **climate change, community wellbeing, housing, land, coast** 14: **transport**. For these SA topics the vision makes some reference to relevant issues that would affect the objective in question but the positive score was not considered to be strong.

Objectives

- 5.8 The objectives of the Local Plan are designed to achieve the Vision and are therefore more focused than the broad vision of Exmoor by 2030, which is reflected in the high number of neutral effects identified where objectives do not relate directly to an SA topic. The effects of the objectives that were identified are generally positive.
- 5.9 Similarly to the effects recorded for the vision, strongly positive scores are identified where the objectives directly address the requirements of the SA topic. As such, strongly positive scores were recorded for **air quality and water resources** in relation to objectives 7, 19 and 21; **biodiversity and green infrastructure** in relation to objectives 3, 4 and 15; **climate change and adaption to flood risk** in relation to objective 20; **climate change and adaption to flood risk** in relation to objectives 7, 19 and 20; **climate change mitigation and energy** in relation to objectives 7, 19 and 21; **community wellbeing** in relation to objectives 8, 9, 10, 13, 16 and 17; **economy and employment** in relation to objectives 14, 16 and 17; **historic environment** in relation to objectives 5 and 6; **housing** in relation to objectives 11 and 12; **land** in relation to objectives 6, 15 and 21; **land** in relation to objective 21; and **landscape** in relation to objectives 1, 2, 5, 15 and 17. No strongly positive scores were recorded in relation to the SA topic **coast**.
- 5.10 A potential negative effect was identified related to objective 1 in relation to **economy and employment** as it may curb development in certain areas; however an overall mixed effect was recorded for this SA topic given that maintaining tranquillity in Exmoor should be of benefit to tourism in the area. Other policies in the Local Plan, in particular in Chapter 7: Achieving a Sustainable Economy, will also provide mitigation. Similarly a negative effect was recorded for objective 2 in relation to **housing** given that this objective may limit housing in certain areas of the national park, but again this would be mitigated by the housing policies in Chapter 6: Achieving a Thriving Community.
- 5.11 A potential negative effect is also identified for objective 5 in relation to **economy and employment** and **housing** given that the protection of the landscape and cultural heritage in Exmoor more impede development which may be of benefit to the fulfilment of these SA topics. Potential negative effects are also identified in relation to the **historic environment, landscape** and **coast** topics (although a

mixed effect for **coast** was identified overall) given that development which may be required to adapt to the effects of climate change (for example flood defences) may be detrimental to the quality of the built environment and special landscape character in the National Park. However, again other policies in the Local Plan in relation to landscape and the historic environment (e.g. CE-S1 and CE-S4) would provide mitigation.

Strategic Priorities

- 5.12 The strategic priorities for the Local Plan are relatively high level and have been prepared to address key concerns raised through consultation; therefore the negative effects identified on the SA topics were limited. The only negative effect expected on any of the SA topics is that of strategic priority 3 on **landscape** given that it allows for flexibility in terms of agricultural and forestry in the National Park.
- 5.13 Strategic priority 1 is expected to have strongly positive effects on **biodiversity and green infrastructure, economy and employment, historic environment, land, and landscape** given that it aims to allow for sustainable development which protects cultural heritage and natural beauty in Exmoor while promoting business related development at appropriate locations. While Strategic priority 3 allows for flexibility in terms of agriculture and forestry development in the National Park, it is specified that such development must be appropriate.
- 5.14 Strongly positive effects are expected for strategic priority 2 in relation to **air quality and water resources, climate change and adaptation to flood risk, climate change mitigation and energy, community well-being, housing, coast and transport**. This strategic priority aims to promote a well-connected National Park in terms of services and facilities, in which affordable housing demands are met and adaptations are made for both the effects of climate change (in terms of flood risk and coastal change) and climate change mitigation (through the promotion of renewable energy).
- 5.15 Strategic priority 3 was only expected to have a strongly positive effect on one of the SA topics it was assessed against: **economy and employment** given that the focus of this priority was limited to fostering a resilient economy in the National Park. It was noted that this aim may have an indirect positive effect (recorded as positive with some opportunity for improvement) on **community well-being** in Exmoor given that it would result in policies which would improve communications networks in the area.
- 5.16 Strongly positive effects are expected to result from strategic priority 4 in relation to **economy and employment and transport**. This priority is expected to result in policies which would be of economic benefit (mainly through tourism-related development) to the National Park as well as benefiting local transport infrastructure given that it aims to ensure the access network and former railway routes are maintained. An indirect positive effect is also expected on **community well-being** in Exmoor from this priority as it encourages understanding and enjoyment through recreational as well as tourism-based development. These facilities may be used by local communities in addition to tourists visiting the National Park.

Recommendations

- 5.17 The following recommendation was made in relation to the vision, objectives and strategic priorities in a draft version of the 2015 SA report:

Strategic priority 3

- It was recommended that the wording of the strategic priority should be amended to address the potential for impacts on the landscape, as a potential minor negative effect on that SA topic was identified. *This recommendation was addressed in the final version of the 2015 Publication Draft Local Plan (the strategic priority now requires such development to be ‘appropriate’) and the SA score for landscape is neutral.*

6 Appraisal of Publication Draft Local Plan Policies – Chapter 3: General Policies including Proposed Main Modifications

6.1 This Chapter covers the following Policies:

- General Policy 1: National Park Purposes and Sustainable Development
- General Policy 2: Major Development
- General Policy 3: Spatial Strategy
- General Policy 4: The Efficient Use of Land and Buildings
- General Policy 5: Securing Planning Benefits – Planning Obligations

6.2 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 amended, albeit the changes relate to minor policy wording. Certain aspects of the supporting text for policies GP1 and GP2 have also been changed, although these changes have not affected the previous SA scores.=

6.3 A summary of the scores for the general policies is given in **Table 6.1** below.

Table 1 Summary score for Local Plan Policies – Chapter 3: General Policies

SA Topics	SA Objectives	GP1	GP2	GP3	GP4	GP5
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.	++	+	+/-	0	0
Biodiversity and green infrastructure	2) To conserve and enhance biodiversity and to protect, conserve and enhance all habitats and species.	++	++	+/-	+	0
Climate change and adaptation to flood risk	3) To minimise and manage the risk of all forms of flooding.	++	++	+	++	0
	4) To minimise the impacts of climate change on Exmoor's communities and habitats.	++	++	+	+	0
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.	+	+	+/-	0	0
Community wellbeing	6) To promote and support thriving and inclusive communities, health and wellbeing.	++	+	++	+	+

SA Topics	SA Objectives	GP1	GP2	GP3	GP4	GP5
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.	++	+/-	++	0	+
Historic environment	8) To maintain and enhance the quality of the built environment.	++	++	+	++	0
Housing	9) To help ensure that National Park communities have access to appropriate, good quality, sustainable, affordable housing.	++	+/-	++	+	+
Land	10) To promote sustainable forms of development and sustainable use of natural resources.	++	++	+	++	0
	11) To reduce all forms of waste production and promote reuse and recycling and minimise the risk of contaminated land.	++	++	+	++	0
Landscape	12) To protect, maintain and enhance the special qualities of the Exmoor National Park's landscape character.	++	++	+	++	0
Coast	13) To protect and/or enhance coastal areas.	+	+	+	0	0
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.	+	+	+/-	0	0

Overall Assessment of Chapter 3: General Policies

- 6.4 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.
- 6.5 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.
- 6.6 The spatial strategy seeks to support local communities and businesses through the identification of a range of settlements where economic development and affordable housing to meet local needs will be supported. Evidence and analysis undertaken to support 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.

- 6.7 The following sections set out the SA findings for each policy in more detail.

GP1: Achieving National Park Purposes and Sustainable Development

- 6.8 GP1 scored positively for all the SA topics, as would be expected given its aim to achieve National Park purposes and sustainable development.
- 6.9 The policy scored strongly positive in relation to the SA topics **Landscape, Biodiversity and Green Infrastructure**, and **Historic Environment** due to the linkages with the National Park first purpose. GP1 also scored strongly in relation to the SA topics **Community and Wellbeing, Housing**, and **Economy and Employment** due to the linkages with the National Park Authority's duty to foster the social and economic wellbeing of local communities.
- 6.10 GP1 also scored strongly positive in relation to the SA topics of **Air Quality and Water Resources, Climate Change and Adaptation to Flood Risk**, and **Land** with clear statements in the policy to support these topics.
- 6.11 For the remaining SA topics of **Climate Change Mitigation and Energy, Coast**, and **Transport**, it was considered that GP1 was positive overall. For the SA topic of **Climate Change Mitigation and Energy** the policy refers to climate change mitigation and while there is no specific reference to making the most of opportunities for renewable energy which could help to achieve this, or reference to the **Coast** or coastal change, these issues are addressed in other Local Plan policies (CC-S5 Low Carbon and Renewable Energy Development, CC-S2 Coastal Development and CC-S3 Porlock Weir Coastal Change Management Area).

GP2: Major Development

- 6.12 GP2 sets out the tests against which any proposals for major development in the National Park would be considered. GP2 scored positively for the majority of the SA topics due to the range of topics addressed in the policy criteria. For the remaining two SA topics of **Housing** and **Economy and Employment** there were both positive and negative impacts identified. In relation to **Housing**, the need for the development would have to be considered against the impact on local communities. There may be benefits where 'small-scale major' housing development takes place, in terms of meeting the needs of local communities, for example in providing affordable housing. The rigorous tests set out in this policy could discourage delivery of affordable housing. However, there would need to be mitigation or compensation for any harm if the development was permitted. 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.

GP3: Spatial Strategy

- 6.13 GP3 sets out the spatial strategy for all development within the National Park, identifying where new development will be focussed and what type of development is permitted within the settlements identified under three categories: Local Service Centres, Villages, and Porlock Weir (see **Table 6.2**).
- 6.14 The Local Service Centres provide the most extensive range of services and are considered to be the most suitable in principle for development, helping to consolidate employment and services and address the needs of local communities as well as visitors. The Villages have a number of services but not the same range as the Local Service Centres, and sometimes they function collectively with shared facilities. Some development in these Villages will help to sustain them in the long term by providing affordable housing where there is local need, and supporting local services, employment and economic diversification. Porlock Weir has a number of shops and other facilities and would normally be considered a 'village'; however it is at risk from coastal flooding and erosion over the longer term and the Shoreline Management Plan policy of 'no active intervention' means that the shoreline will be allowed to retreat naturally and existing defences will not be maintained or improved nor new defences provided unless other funds are available. Any developments at Porlock Weir would be in this context and should accord with CC-S4 Replacement Development from Coastal Change Management Areas.

Table 2 Settlement Hierarchy

Settlement type	Settlements included
Local Service Centres	Dulverton Lynton & Lynmouth Porlock
Villages	Barbrook Brendon Bridgetown and Exton Brompton Regis Challacombe Cutcombe and Wheddon Cross Dunster Exford Luxborough Monksilver Parracombe Roadwater Simonsbath Timberscombe Winsford Withypool Wootton Courtenay
Porlock Weir	Porlock Weir

- 6.15 GP3 scored strongly positive against the SA objectives of **Community and Wellbeing, Housing, and Economy and Employment** as it supports development in a wide range of settlements, helping to sustain local services and facilities, provide for the housing needs of local communities, and encourage economic development.

- 6.16 GP3 was also considered to be positive in relation to **Land and Landscape**. The capacity of the landscape to accommodate development has been assessed for the Local Service Centres and Villages through the Landscape Sensitivity Study¹⁰. All the settlements were considered to have some capacity for development, although in some cases the capacity is low, or other constraints such as flood risk may limit development.
- 6.17 A positive score was also given in relation to the SA topic of the **Coast**. The main settlements on the coast are Lynmouth and Porlock Weir. The policy approach in the Shoreline Management Plan for Lynmouth is to 'hold the line', meaning that flood defences will be maintained, although any proposed development will still need to take account of the policies on Flood Risk (CC-S1, CC-D1). For Porlock Weir a separate policy approach is included due to the settlement being identified as a coastal change area (CC-S4).
- 6.18 There could be mixed or uncertain effects in relation to the **Historic Environment**. New development could have either positive or negative effects on nearby heritage assets and would depend largely on the specific location of sites and the design of the development. Whilst there are other policies that would apply (CE-S4 Cultural Heritage and Historic Environment and CE-D3 Conserving Heritage Assets), some of the settlements identified have limited capacity due to their heritage assets (including Conservation Areas and listed buildings).
- 6.19 There are also mixed implications for **Biodiversity and Green Infrastructure**. Development in some settlements may be constrained due to wildlife, although policy safeguards in the Local Plan will ensure protection of designated sites and species (CE-S3 Biodiversity and Green Infrastructure).
- 6.20 There are mixed effects on **Air Quality and Water Resources**, and **Climate Change Mitigation and Energy**. Overall air and water quality on Exmoor is good, although there are some settlements with local issues of air quality e.g. Dulverton and Porlock due to solid fuel heating, or traffic congestion in Lynton and Lynmouth. Overall levels of development during the Plan period are not likely to significantly affect this. The spatial strategy identifies the Local Service Centres as being the most suitable places in principle for new development. As these are the main centres of population, employment and provide the widest range of services and facilities, they can potentially help to mitigate climate change through the co-location of jobs, housing and services, thus reducing the need to travel. Including additional settlements could increase emissions from travel but equally could reduce the need to travel through helping to co-locate jobs and housing, and levels of additional development in these settlements will be low anyway. There could potentially be additional sewerage requirements for development and abstractions for drinking water but again overall levels of development are such that any impacts are not likely to be significant.
- 6.21 A positive score was also given in relation to **Climate Change and Adaptation to Flood Risk**. A number of settlements include areas identified as at risk of flooding, although in the majority of cases there is likely to be capacity for development outside these areas. While flood risk could be a constraint to development in some settlements, the policy makes reference to the need to avoid areas at risk from flooding.

¹⁰ Landscape Sensitivity Study, Paul Bryan for Exmoor National Park Authority (2011)

Assessment of identified settlements

- 6.22 An assessment has also been undertaken of the potential sustainability effects for the list of settlements identified in the spatial strategy, see **Table 6.3** overleaf. The findings of the Habitats Regulations Assessment were taken into account in the scores relating to **Biodiversity and Green Infrastructure**.
- 6.23 The Local Service Centres scored strongly positive in relation to the SA topics of **Community and Wellbeing, Employment and Economy** and **Housing**, as they have been identified as the settlements most suitable for accommodating development which will support local communities and businesses, and help to address local affordable housing needs. Dunster was given a mixed score for **Housing**, as it has been assessed to only have low overall capacity for future housing development due to the high landscape and historic value associated with the settlement, and it is only likely to be able to address the housing needs of the parish over the longer term. There are mixed implications in relation to many of the other SA topics, as development could in some cases help to contribute to sustainability objectives through good design, sustainable construction and so on, but it could also lead to impacts or additional pressures. As no specific sites have been identified, each proposal will need to be considered on its own merits against the policies in the Local Plan.
- 6.24 The Villages also scored positively in relation to the SA topics of **Community and Wellbeing, Employment and Economy**, and **Housing**, as their identification as settlements will enable development which will help to meet the needs of the local community (for affordable housing and retaining services and facilities) and support local businesses, although the scale of development will need to be proportionate to the settlement size and capacity. Development in some Villages may be constrained by environmental factors including biodiversity, cultural heritage, landscape sensitivity or flood risk, but in the majority of cases there is considered to be sufficient capacity for some development to take place, particularly given the sequential approach to considering reuse of existing buildings first, and policy safeguards to ensure proposals do not damage such assets. Two settlements (Allerford¹¹ and Timberscombe) were identified with significant flood risk constraints that, along with other environmental considerations, could reduce capacity for new build development in the settlement. Levels of development in the Villages were not considered to be significant in relation to climate change mitigation or air quality and water resources. However, two settlements (Brompton Regis and Simonsbath) were identified where there may be water quality issues associated with sewerage, and care would be needed to ensure that future development did not exacerbate this. Transport implications could be an issue for two of the Villages (Brendon and Challacombe) which do not have public or community transport and so will primarily rely on access to a private car.
- 6.25 The HRA identified a number of settlements where the presence of internationally important habitats and protected species would need to be taken into account, and any development requiring land take may require a test of likely significance under the Habitats Regulations 2010. In a draft version of the 2015 SA report it was recommended that the relevant settlement descriptions in Chapter 10 of the Local Plan make reference to European designated sites that are in close proximity – this recommendation was addressed in the final version of the Publication Draft Local Plan (2015).

¹¹ Allerford was changed to a Rural Community as a result of the SA recommendations

Table 3 Summary Scores for Settlements

	Air quality & water resources	Biodiversity & Green Infrastructure	Climate Change & Adaption to Flood Risk	Climate Change Mitigation and Energy	Community Wellbeing	Economy and Employment	Historic Environment	Housing	Land	Landscape	Coast	Transport
Local Centres												
Dulverton	+/-	+/-	+/-	+	++	++	+/-	++	+/-	+/-	0	+
Lynton & Lynmouth	+	+/-	+/-	+/-	++	++	+/-	++	+/-	+/-	+	+/-
Porlock	+/-	+/-	+/-	+/-	++	++	+/-	++	+/-	+/-	0	+/-
Villages												
Barbrook	+	0	+/-	+/-	+	+	0	+	+/-	+	0	+/-
Brendon	0	+/-	+/-	0	+	+	0	++	+/-	+	0	-
Bridgetown & Exton	0	0	+/-	0	+	+	0	++	+/-	+	0	+/-
Challacombe	0	+/-	+/-	0	+	+	0	+/-	+	+/-	0	-
Cutcombe & Wheddon Cross	0	+/-	0	0	++	++	0	++	+/-	+	0	+/-
Dunster	+/-	+/-	+	+/-	++	++	+/-	+/-	+	+/-	0	+/-
Exford	0	0	+/-	0	+	+	0	++	+/-	+	0	+/-
Luxborough	0	+/-	+/-	0	+	+	0	+	+	+/-	0	+
Monksilver	0	+/-	+/-	0	+	+	0	+	+	+/-	0	+/-
Parracombe	0	0	+/-	0	+	+	+/-	++	+/-	+	0	+
Roadwater	0	0	+/-	0	+	+	0	++	+/-	+	0	+/-
Simonsbath	+/-	+/-	0	0	+	+	+/-	+	+	+/-	0	+
Timberscombe	0	+/-	+/-	0	+	+	0	++	+/-	+	0	+
Winsford	0	+/-	+/-	0	+	+	0	+	+	+/-	0	+
Withypool	+	+/-	+/-	0	+	+	0	+	+	+/-	0	+
Wootton Courtney	0	+/-	+/-	0	+	+	+/-	++	+/-	+	0	+
Porlock Weir	0	+/-	+	0	+	+/-	+/-	+	+/-	+/-	+	+

GP4: The Efficient Use of Land and Buildings

- 6.26 GP4 requires development proposals to demonstrate the efficient use of land and buildings, prioritising brownfield over greenfield sites. The policy was considered to be positive in relation to several of the sustainability topics due to the range of criteria included in the policy. The policy is positive in relation to the topic of **Biodiversity and Green Infrastructure** as it should help to avoid habitat loss as a result of development on greenfield land and the policy makes reference to avoiding brownfield land that has high ecological value.
- 6.27 GP4 is also positive in relation to the **Climate Change and Adaptation to Flood Risk** topic, both in relation to the SA objective to minimise flood risk and the objective to minimise the impacts of climate change on communities and habitats. Encouraging development on brownfield land will help to avoid permeable surfaces being lost which could have otherwise reduced infiltration and increased flood risk.
- 6.28 As a result of the measures in the policy that will help to reduce flood risk resulting from new development, positive effects on the SA topic **Community and Wellbeing** are also likely as flooding could otherwise adversely affect health.
- 6.29 GP4 is positive in relation to the **Historic Environment** topic as it requires development to reflect the historic form and pattern of the settlement. It is also positive in relation to Housing as the requirements of the policy should help to ensure that new housing makes good use of existing land and buildings.
- 6.30 A strongly positive effect on the topic of **Land** (in relation to both of the SA objectives in that topic) is expected as the primary purpose of the policy is to promote the sustainable use of land. Encouraging the re-use of previously developed sites and existing buildings should help to minimise the waste generation associated with new development. Similarly, the policy has a strongly positive relationship with the **Landscape** topic as focussing development on brownfield sites would help to reduce the impact of new development on the overall appearance of the surrounding landscape, and the policy requires development in or near to settlements to be consistent with their form.
- 6.31 A neutral score was given in relation to the other SA topics as there is no direct relationship with the policy.

GP5: Securing Planning Benefits – Planning Obligations

- 6.32 GP5 is an enabling policy for planning obligations or potentially a Community Infrastructure Levy (CIL) to ameliorate the impact of proposals and contribute to the provision of infrastructure necessary to support the development. The policy does not include specific proposals for infrastructure to be included so cannot be assessed in terms of impacts on a number of SA objectives – these would have to be considered on a case by case basis.
- 6.33 GP5 was considered to be positive in relation to the SA topics of **Community and Wellbeing, Housing, and Economy and Employment**. The policy is aimed at supporting vibrant communities, local businesses and the economy by providing the infrastructure necessary to support development. Affordable housing can be provided through planning obligations or a CIL, however market housing is only allowed in certain circumstances to cross-subsidise affordable housing.
- 6.34 A neutral score was given in relation to the other SA topics. Depending on the type of infrastructure being proposed, there could be positive or negative implications for

example in relation to flood risk, landscape, wildlife or cultural heritage. However these would have to be considered based on the specific proposals and in relation to other policies in the Plan.

Recommendations

6.35 The following recommendation was made in relation to the General Policies in a draft version of the 2015 SA report:

GP3: Spatial Strategy

- It was recommended that reference to flood risk is reinserted into the spatial strategy policy. *This recommendation was addressed in the final version of the Publication Draft Local Plan (2015).*

7 Appraisal of Publication Draft Local Plan Policies – Chapter 4: Conserving and Enhancing Exmoor including Proposed Main Modifications

7.1 This Chapter covers the following Policies:

- CE-S1: Landscape Character
- CE-D1: Protecting Exmoor’s Landscapes and Seascapes
- CE-S2: Protecting Exmoor’s Dark Night Sky
- CE-S3: Biodiversity and Green Infrastructure
- CE-D2: Green Infrastructure Provision
- CE-S4: Cultural Heritage and Historic Environment
- CE-D3: Conserving Heritage Assets
- CE-S5: Principles for the Conversion or Structural Alteration of Existing Buildings
- CE-S6: Design and Sustainable Construction Principles
- CE-D4: Extensions
- CE-D5: Advertisements and Private Road Signs
- CE-D6: Shopfronts
- CE-S7: Small Scale Working or Re-working for Building and Roofing Stone
- CE-S8: Minerals Safeguarding Areas
- CE-S9: Major Mineral Extraction
- CE-D7: Interim Development Order Permissions

7.1 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 changes to policy wording intended to make the policy clearer and bring it in line with the NPPF. 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 area. 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. Where necessary, changes have also been made to the supporting text for each policy in this section, although this has not changed the previous SA scores.

7.2 Changes to policies have been addressed in the updated appraisal of likely effects described in this chapter.

7.3 A summary of the scores for these Policies is given in **Table 7.1** overleaf.

Table 4 Summary score for Local Plan Policies – Chapter 4: Conserving and Enhancing Exmoor

SA Topics	SA Objectives	SA Objectives														
		CE-S1	CE-D1	CE-S2	CE-S3	CE-D2	CE-S4	CE-D3	CE-S5	CE-S6	CE-D4	CE-D5	CE-D6	CE-S7	CE-S9	CE-D7
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.	0	0	0	+	++	0	0	+	+	0	0	0	+	+	0
Biodiversity and green infrastructure	2) To conserve and enhance biodiversity and to protect, conserve and enhance all habitats and species.	0	0	++	++	++	0	0	+	+	0	0	0	+	+	+
Climate change and adaptation to flood risk	3) To minimise and manage the risk of all forms of flooding.	0	0	0	++	++	0	++	0	+	0	0	0	+	0	0
	4) To minimise the impacts of climate change on Exmoor’s communities and habitats.	0	0	0	++	++	0	++	0	+	0	0	0	+	0	0
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.	0	0	+	+/-	+	0	+/-	+	++	0	0	0	+	+	0
Community wellbeing	6) To promote and support thriving and inclusive communities, health and wellbeing.	+	+	+	+	+	+	+	0	++	0	+	0	+	+	+
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	+	+	+	+/-	+	+	+	+	+	0	+	+	+	0	+

SA Topics	SA Objectives	CE Objectives														
		CE-S1	CE-D1	CE-S2	CE-S3	CE-D2	CE-S4	CE-D3	CE-S5	CE-S6	CE-D4	CE-D5	CE-D6	CE-S7	CE-S9	CE-D7
	businesses.															
Historic environment	8) To maintain and enhance the quality of the built environment.	+	+	+	0	+	++	++	++	++	++	++	+	+	+	+
Housing	9) To help ensure that National Park communities have access to appropriate, good quality, sustainable, affordable housing.	0	0	+	+/-	+	0	+/-	0	+	+	0	0	0	0	0
Land	10) To promote sustainable forms of development and sustainable use of natural resources.	+	+	0	0	+	0	+	+	+	0	0	0	+	+	0
	11) To reduce all forms of waste production and promote reuse and recycling and minimise the risk of contaminated land.	+	+	0	+/-	+	0	+	+	+	0	0	0	+	+	0
Landscape	12) To protect, maintain and enhance the special qualities of the Exmoor National Park's landscape character.	++	++	++	+/-	++	+	++	+	++	++	++	+	+	+	+
Coast	13) To protect and/or enhance coastal areas.	++	++	+	+	+	0	++	0	+	0	0	0	0	0	0
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.	0	0	+	-	+	0	-	0	+/-	0	+	0	+	+	+

Overall Assessment of Chapter 4: Conserving and Enhancing Exmoor

- 7.4 There are a number of positive and strongly positive scores for this Chapter, as would be expected as it primarily relates to the conservation and enhancement of Exmoor, including policies on landscape and seascape character, dark night skies, biodiversity, green infrastructure, and cultural heritage, which link very closely with the National Park purposes. There are also policies concerning design and sustainable construction, the conversion of buildings, advertisements and signage, and mineral extraction.
- 7.5 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 objectives, 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.
- 7.6 The policies are generally positive for local communities 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, work 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.
- 7.7 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. However, conservation of the National Park's landscape and seascape 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.
- 7.8 The following sections set out the SA findings for each policy in more detail.

CE-S1: Landscape and Seascape Character

- 7.9 CE-S1 aims to conserve and enhance the landscape and seascape character of the National Park and adjacent coastal areas, consistent with the first statutory purpose of its designation.
- 7.10 CE-S1 scored strongly positive in relation to the SA topics **Landscape** and **Coast** as its primary aim is to conserve and enhance the landscape character and seascape character of the National Park and adjacent coastal areas.
- 7.11 While the policy does not make specific reference to the **Historic Environment**, it is also positive in relation to this SA topic as it will help to conserve and enhance the

setting of heritage assets as an indirect effect of the measures to preserve the wider landscape.

- 7.12 CE-S1 also scored positively in relation to the SA topics of **Community and Wellbeing**, and **Economy and Employment**. Maintaining the high quality of the landscape and seascape is important to people's health and well-being in general. The landscape and seascape provides inspiration and is what attracts people to visit and enjoy the National Park. This is reflected in the text, and the aim of the policy is to protect the landscape and seascape character that is valued by local communities and visitors alike. Similarly, landscape and seascape character is crucially important to the economy, it is what attracts many people to live in, work in and visit the National Park, although economic activity can damage landscape and seascape character if not undertaken sensitively, and the aim of the policy is to ensure that development proposals are informed by and complement landscape and seascape character.
- 7.13 CE-S1 has both positive and negative implications in relation to the SA topic of **Land**. Landscape and seascape character is likely to constrain certain activities within the National Park, including mineral extraction and waste disposal. However, the aim of the policy to conserve landscape and seascape character could indirectly support the re-use of land and buildings.
- 7.14 There were not considered to be any implications of CE-S1 for the SA topics of **Air Quality and Water Resources, Biodiversity and Green Infrastructure, Climate Change and Adaptation to Flood Risk, Climate Change Mitigation and Energy, Housing and Transport**.

CE-D1: Protecting Exmoor's Landscapes and Seascapes

- 7.15 CE-D1 scored strongly positive in relation to the SA topic **Landscape** as its primary aim is to protect Exmoor's landscapes and seascapes. It only permits development where it will not compromise the conservation and enhancement of landscapes and seascapes, requiring the visual impacts of development to be minimised through high quality design and encouraging the use of landscaping schemes to reinforce local character. The policy also requires development within the Heritage Coast to be appropriate
- 7.16 A positive impact on the SA theme of the **Historic Environment** is also identified as the benefits of the policy for the landscape will also enhance the setting of heritage assets in the National Park. The policy also refers to historic and cultural heritage including Heritage Coast.
- 7.17 CE-D1 also scored positively in relation to the SA topics of **Community and Wellbeing** and **Economy and Employment**. Maintaining the high quality of the landscape is important to people's health and well-being in general and helps to boost the tourism economy of the area.
- 7.18 CE-D1 scored strongly positive in relation to the SA topic of **Coast**. Seascapes are recognised as an important part of the character of the National Park and the policy requires development to be appropriate in relation to the conservation of seascape attributes, including Exmoor's Heritage Coast.
- 7.19 CE-D1 also has both positive and negative implications in relation to the SA topic of **Land**. Landscape character is likely to constrain certain activities within the National Park, including mineral extraction and waste disposal. However, the aim of the

policy to conserve landscape and seascape character could indirectly support the re-use of land and buildings.

- 7.20 There were not considered to be any implications of CE-D1 for the SA topics of **Air Quality and Water Resources, Biodiversity and Green Infrastructure, Climate Change and Adaptation to Flood Risk, Climate Change Mitigation and Energy, Housing and Transport.**

CE-S2: Protecting Exmoor's Dark Night Sky

- 7.21 CE-S2 aims to protect Exmoor's dark night skies from light pollution, reflecting the importance of dark skies to tranquillity and the recognition of this through the designation of Exmoor National Park as the first Dark Sky Reserve in Europe.
- 7.22 Policy CE-S2 scored strongly positive for the SA topic of **Biodiversity and Green Infrastructure**. The policy and text reflect the fact that light pollution is known to adversely impact on wildlife and their habitats. Bats are highlighted as an example of a species particularly sensitive to external lighting. The policy aims to reduce all forms of external light spillage and avoid adverse impacts on wildlife and habitats.
- 7.23 Policy CE-S2 also scored strongly positive for **Landscape**. The aim of the policy to conserve the tranquillity and dark sky experience of the National Park will strongly support the objective to protect and enhance landscape character. The policy specifically refers to avoiding adverse impacts on the visual character of the landscape.
- 7.24 Policy CE-S2 scored positively for **Climate Change Mitigation and Energy**. The text recognises that ensuring lighting is efficient will help reduce carbon emissions and contribute to climate change mitigation. The policy seeks to reduce all unnecessary forms of outdoor lighting which will help reduce demand for energy, although this is not specifically referenced.
- 7.25 Policy CE-S2 scored positively for **Community and Wellbeing**. Dark night skies are an important aspect of tranquillity, which supports the health and well-being of communities. The text recognises the growing public interest in the night sky and support for reducing light pollution. The text also recognises the work by Highways Authorities and ENPA with communities to introduce part-night lighting in some settlements. The policy ensures that lighting management and design is consistent with safety, and proposals will be allowed where they are required for safety, security or community reasons.
- 7.26 Policy CE-S2 scored positively for **Economy and Employment** as the designation of Exmoor as a Dark Sky Reserve will be beneficial for the tourism sector and local employers.
- 7.27 Policy CE-S2 scored positively for **Historic Environment** as preventing light pollution will help to conserve and enhance the setting of heritage assets. The policy refers to avoiding unacceptable adverse impacts on the historic environment through good lighting management and design. The historic environment will be an important consideration for any new lighting proposed as lighting can enhance as well as detract from historic buildings – this is recognised in the supporting text to the policy. Any lighting will need to be appropriate to the integrity of heritage assets and minimise light spillage.
- 7.28 Policy CE-S2 scored positively for **Housing**. The text recognises that there may be occasions when lighting is required for safety or community reasons.

- 7.29 Policy CE-S2 scored positively for **Coast**. The policy does not currently refer to the coast or seascapes, although the undeveloped nature of the coast is an important quality of the National Park's seascapes, so unnecessary lighting should be avoided.
- 7.30 Policy CE-S2 scored positively for **Transport**. The text refers to working with Highways Authorities and communities to reduce lighting within streets and car parks, although this should not adversely impact on issues of safety or community need.
- 7.31 Policy CE-S2 was considered to be neutral in relation to the SA topic of **Air Quality and Water Resources** as it does not have any direct relevance to air or water quality, although Exmoor's air quality is generally good, and this contributes to the overall quality and visibility of the dark night time skies. The policy was also not considered to have any direct relevance to the SA topics of **Climate Change and Adaptation to Flood Risk**, and **Land** and so scored neutral for these as well.

CE-S3: Biodiversity and Green Infrastructure

- 7.32 CE-S3 aims to protect and enhance the wildlife and habitats on Exmoor, in accordance with the National Park's first purpose and this is a key policy to help deliver the statutory purpose.
- 7.33 CE-S3 scored strongly positive for the SA topic of **Biodiversity and Green Infrastructure**, as would be expected. The policy aims to protect and enhance the range of wildlife and habitats on Exmoor, recognising the legal protection afforded to many of them, as well as locally important biodiversity. It also encourages linkages and connections to be made to enhance ecological networks and biodiversity, including through green infrastructure and linkages across the National Park boundary to neighbouring authorities. It also encourages the creation of multi-functional green infrastructure.
- 7.34 CE-S3 also scored strongly positive for the SA topic **Climate Change and Adaptation to Flood Risk**. The policy encourages proposals to enable habitats and species to adapt to climate change, including measures to extend and connect habitats which will help build resilience.
- 7.35 CE-S3 scored positively for the SA topic of **Air Quality and Water Resources**. Exmoor's good quality air and water are important for the wide range of species and habitats on Exmoor; therefore the policy will indirectly help to conserve air and water quality through protection of habitats.
- 7.36 CE-S3 scored positively for the SA topic of **Community and Wellbeing**. The supporting text refers to the importance of wildlife and ecosystems for contributing to the quality of life and the well-being of the community. Enhancing green infrastructure will also have benefits for health.
- 7.37 CE-S3 scored positively for the SA topic of **Coast**. The policy seeks to avoid adverse effects on priority habitats and species, and the supporting text includes important coastal habitats such as coastal heaths and coastal vegetated shingle in the list of Exmoor's Priority Habitats. The impact of climate change and sea level rise on these habitats is recognised within the policy.
- 7.38 There were both positive and negative implications for the SA topic of **Climate Change Mitigation and Energy**. The policy supports proposals that enable climate change mitigation, providing they do not adversely affect the integrity or special

interest of biodiversity sites. However, potential impacts on wildlife or habitats could constrain renewable energy proposals which are important for climate change mitigation.

- 7.39 CE-S3 also scored both positively and negatively for **Economy and Employment**. Wildlife is an important part of what attracts people to live, work and visit Exmoor and therefore helps directly and indirectly to support the local economy and tourism sector. Conversely, the protection of habitats and species can be a constraint on economic development.
- 7.40 There were both positive and negative implications for the SA topic of **Housing**. The protection of species and habitats can constrain the location of new housing or conversion of existing buildings. However, the supporting text includes reference to protection of species such as bats and barn owls and measures to ensure that access and breeding or roosting sites are provided.
- 7.41 There were also positive and negative implications for the SA topic of **Landscape**. Biodiversity is an integral part of landscape character; however the creation or restoration of habitats will potentially change landscape character.
- 7.42 CE-S3 scored negatively in relation to the SA topic of **Land**. The re-use of land and buildings can conflict with biodiversity objectives where there is existing biodiversity value.
- 7.43 CE-S3 also scored negatively for the SA topic of **Transport**. The protection of important habitats and species could constrain access and recreation, particularly where species are sensitive to disturbance. The National Park statutory purposes are to conserve landscape, wildlife and cultural heritage; and promote understanding and enjoyment. However, the Sandford principle¹² would be applied where these conflict, giving greater weight to conservation of biodiversity.
- 7.44 There were not considered to be any specific issues relating to **Historic Environment**, so CE-S3 was given a neutral score for this theme.

CE-D2: Green Infrastructure Provision

- 7.45 This policy encourages the positive planning of green infrastructure, which is defined as a wide range of high quality natural, semi-natural and amenity green spaces and other environmental features. Green infrastructure is multi-functional and can provide benefits for wildlife, carbon storage, flood protection, water purification as well as for local communities in terms of access and recreation, health and wellbeing.
- 7.46 The policy is strongly positive in relation to the SA topics of **Biodiversity and Green Infrastructure** and **Landscape**, as the aim of the policy is to deliver green infrastructure and landscape enhancements as part of this, including linkages across National Park boundaries which will strengthen the resilience of ecological networks and movement of species thorough the landscape as well as enhancing the landscape and setting of the National Park. CE-D2 is also strongly positive in relation to **Climate Change and Adaptation to Flood Risk**, with clear references to the opportunities green infrastructure brings to provide flood protection.
- 7.47 The policy is positive for all the remaining SA topics. In relation to **Air Quality and Water Resources and the Coast**, the water environment is an element of green

¹² The Sandford Principle was established as part of the Environment Act 1995, to give greater weight to the first purpose where there are irreconcilable conflicts.

infrastructure including coast, rivers, streams, floodplains, ponds, lakes and sustainable drainage systems. While there is no specific reference to air quality, green infrastructure and open space can act as the 'green lungs' of a settlement and generally will contribute to air quality. There are also benefits for **Climate Change Mitigation and Energy** for example through carbon storage including woodland planting and mire restoration, as well as reducing carbon emissions from transport by providing alternative access routes. The creation and enhancement of green infrastructure can also help to safeguard Land, and potentially deal with contamination.

- 7.48 Green infrastructure can benefit **Community and Wellbeing** including physical and mental health and **Housing**. High quality natural environments have been shown to foster healthy communities and green spaces encourage social activity. There are also potential benefits to the **Economy and Employment**, directly through employment in capital projects and future management, and indirectly through sustaining a high quality environment to attract visitors and businesses to Exmoor. There could also be **Transport** benefits, through the opportunities green infrastructure brings to encourage sustainable modes of travel and providing alternative access routes.
- 7.49 The policy directly refers to the **Historic Environment**, stating that green infrastructure proposals should protect and enhance the historic environment. Therefore, the policy scored positive against that SA theme.

CE-S4: Cultural Heritage and Historic Environment

- 7.50 Policy CE-S4 aims to protect and enhance the cultural heritage and historic environment on Exmoor, in accordance with the National Park's first purpose and this is a key policy to help deliver the statutory purpose.
- 7.51 As would be expected, this policy scored strongly positive for the SA topic **Historic Environment**, as the aim of the policy is to conserve and enhance the cultural heritage of the National Park. The policy also scored strongly positive in relation to **Landscape**, recognising that the historic environment and cultural heritage are an integral part of landscape character. The policy addresses historic landscapes, registered historic parks and gardens, and the historic or architectural character of settlements.
- 7.52 The policy scored positively for the SA topic of **Community and Wellbeing**. Cultural heritage is an integral part of local communities and local distinctiveness. The aim of the policy is to protect and enhance heritage assets including their conservation for future generations. The policy supports measures to ensure that people can enjoy the historic environment.
- 7.53 The policy also scored positively for the SA topic of **Economy and Employment** as the text recognises that cultural assets contribute to the economy.
- 7.54 The policy did not have any relevant issues relating to the SA topics of **Air Quality and Water Resources, Climate Change and Adaptation to Flood Risk, Climate Change Mitigation and Energy, Housing, Land, Coast, Transport** or **Biodiversity and Green Infrastructure**, so were given a neutral score for these topics.

CE-D3: Conserving Heritage Assets

- 7.55 Policy CE-D3 sets out the approach to managing development affecting heritage assets in the National Park.
- 7.56 As would be expected, the policy scored strongly positive for the SA topic **Historic Environment**, as the aim of the policy is to conserve heritage assets in the National Park including conservation areas, principal archaeological landscapes, and redundant/at risk assets. The policy also scored strongly positive in relation to **Landscape**, as the historic environment and cultural heritage are an integral part of landscape character.
- 7.57 The policy also scored strongly positive for the SA topic **Climate Change and Adaptation to Flood Risk**. The implications of climate change for the historic environment are recognised in the text, both in terms of the need for alterations to historic assets to adapt to climate change, and the impact this could have on the special interest of the building or site. The policy supports measures to adapt to climate change where required to safeguard the heritage asset, where their special interest will be conserved. Similarly, the policy scored strongly positive in relation to the **Coast** as it considers the implications of climate change and sea level rise on heritage assets. The text recognises that sea level rise is likely to directly impact on sites, and the policy seeks to ensure that where such sites are likely to be lost, they are preserved through record.
- 7.58 The policy scored positively for the SA topic of **Community and Wellbeing**. Cultural heritage is an integral part of local communities and local distinctiveness and the aim of the policy is to conserve heritage.
- 7.59 The policy also scored positively for the SA topic of **Economy and Employment**. The text recognises that cultural assets contribute to the economy and the policy enables heritage assets that are redundant or at risk to be brought back into a viable use. Similarly, the policy scored positively for the SA topic of **Land** as it promotes the re-use of buildings, which also contributes to the reduction of waste and use of embodied energy.
- 7.60 There were both positive and negative implications in relation to the SA topic of **Climate Change Mitigation and Energy**. The need to support climate change mitigation is reflected in the text, including the opportunity to re-use existing buildings and therefore take account of the embodied energy within these buildings. The policy also supports measures to mitigate climate change where these would not harm the special interest or appearance of the heritage asset. However, the protection of historic assets could constrain the application of certain renewable energy technologies.
- 7.61 There were both positive and negative implications in relation to the SA topic of **Housing**. The policy encourages the re-use of redundant or at risk buildings which could include for affordable housing. However, the restrictions to alterations to historic buildings could prevent conversion for affordable housing.
- 7.62 The policy scored negatively in relation to **Transport** as the historic nature of many of Exmoor's settlements restricts opportunities for transport improvements, measures to ease traffic congestion, new car parks and so on.
- 7.63 The policy did not have any relevant issues relating to the SA topics of **Air Quality** and **Water Resources**, or **Biodiversity** and **Green Infrastructure**, so were given a neutral score for these topics.

CE-S5: Principles for the Conversion or Structural Alteration of Existing Buildings

- 7.64 This policy sets out the principles that should be applied to the conversion of existing buildings, or to structural alterations. Traditional buildings include a range of building types, including farm buildings, but are defined as buildings of solid wall construction built of natural and often local materials, that predate the Second World War. The aim of the policy is to encourage the continuation of the original use and sensitive repair of these buildings using traditional materials. Where the retention of the original use is not feasible, adaptation will be considered, where this will help to sustain the long term maintenance of the building fabric. Such adaptations will require sympathetic design, using traditional approaches to materials and detailing to conserve the intrinsic quality, character and appearance of the building. Non-traditional buildings are generally considered to be those built post-war. The re-use of traditional buildings should be considered first, but where this is not possible or appropriate, non-traditional buildings can be used, subject to criteria.
- 7.65 The policy was considered to be strongly positive in relation to the **Historic Environment**, as the approach is to encourage the reuse of traditional buildings first, which will be beneficial in maintaining buildings and the contribution they make to local character. The encouragement of traditional building methods and materials will be positive in keeping the historic character and fabric. The conversion of isolated farm buildings is not encouraged as they are particularly sensitive in terms of their setting. There may be other circumstances where a traditional building may be considered too sensitive to convert due to its historic value.
- 7.66 The policy will contribute to **Climate Change Mitigation and Energy** as the reuse of existing buildings will use embodied energy. The reuse of existing buildings is also generally positive for **Air Quality and Water Resources** as it reduces potential pollution risks during construction. The use of traditional or natural materials will also be beneficial in relation to natural resources. There could also be benefits for the **Economy and Employment**, depending on the use that they are being adapted for. The encouragement of traditional building methods and materials will also be positive in relation to skills and employment.
- 7.67 A positive score was given in relation to the SA topics of **Landscape, Land, and Biodiversity and Green Infrastructure**, as the reuse of existing buildings would reduce land-take and also potentially reduce visual impact. There could be opportunities for conservation and enhancement of landscape character and biodiversity through measures to provide visual and environmental enhancement. The conversion of isolated farm buildings is not encouraged as they are particularly sensitive in terms of their setting, and there may be other circumstances when a traditional building may be considered too sensitive to convert due to its landscape sensitivity or wildlife interest. The policy specifically refers to the protection or bat and barn owl roosts.
- 7.68 A neutral score was given in relation to the other SA topics.

CE-S6: Design and Sustainable Construction Principles

- 7.69 Policy CE-S6 aims to promote high quality design and sustainable construction standards.
- 7.70 CE-S6 scored strongly positive in relation to **Climate Change Mitigation and Energy**. The policy promotes sustainable construction methods incorporating

methods that help reduce carbon emissions e.g. energy efficiency and use of renewable energy technologies, as well as methods to future proof against flooding . The policy does not set local standards for sustainable construction due to the low levels of development within the National Park, but relies on the national standards being applied through Building Regulations.

- 7.71 CE-S6 also scored strongly positive for **Community and Wellbeing**. The use of sustainable construction principles will provide benefits for health and wellbeing. The policy also encourages measures to improve safety, inclusivity and accessibility and to promote footpaths and cycle-ways. It also requires that new development should not affect the amenity of surrounding properties and occupiers.
- 7.72 The policy scored strongly positive for the SA topics of **Landscape and Historic Environment**. The policy seeks to enhance local distinctiveness and landscape character and the historic environment. Development should contribute positively to its setting and materials and design must be sympathetic to the local vernacular context. The policy requires development to enhance local identity and distinctiveness of the built environment. It requires materials to be sympathetic to the local vernacular context; reinforces landscape features including traditional features such as stone walls; and requires the layout to respond to local character and the proportions of the historic street pattern. New additions or extensions to existing traditional buildings should reflect the historic significance, character and appearance of the original building through sensitive design and use of traditional materials. They should also complement the form, character and setting of the original building.
- 7.73 CE-S6 scored positively in relation to **Land**. The use of local materials will support local sustainable mineral extraction. Waste and resource use will be minimised by reuse of buildings and materials; management of site waste; and provision of adequate recycling facilities.
- 7.74 CE-S6 scored positively in relation to the SA topics **Air Quality and Water Resources, Climate Change and Adaptation to Flood Risk and Coast**. The policy promotes sustainable construction standards including water conservation measures, sustainable drainage systems which will also protect water quality. Building to sustainable standards including passive design and utilising renewable energy technologies should reduce the need for heating from non-renewable resources, which will help maintain good air quality. The policy includes measures to future proof development against climate change impacts including flood risk, by incorporating measures such as sustainable drainage systems.
- 7.75 CE-S6 scored positively in relation to **Biodiversity and Green Infrastructure**. The policy requires measures to maintain, promote or restore biodiversity. Many sustainable construction measures will be indirectly beneficial for wildlife, e.g. water conservation measures will reduce the need to extract water from the environment; landscaping can have benefits for wildlife.
- 7.76 CE-S6 scored positively in relation to **Economy and Employment**. The use of traditional building materials and methods will support local craftsmen and trades and the retention of these traditional skills. Similarly the promotion of sustainable construction methods including renewable energy technologies could provide jobs for local installers and suppliers.
- 7.77 CE-S6 scored positively in relation to **Housing** as the policy should reinforce inclusive design and accessibility which will help meet the requirements of a diverse

range of households including older and disabled people. Also, the sustainable construction principles include energy efficiency requirements which will improve the quality of homes built and avoid future problems of fuel poverty.

- 7.78 There were both positive and negative implications in relation to **Transport**. The policy encourages sufficient provision of public space and the incorporation of footways and cycle-ways. Development should reinforce inclusive design and accessibility which will support access requirements such as disabled parking. However, the policy requires the layout and design of new streets and associated infrastructure to respond to local character and the scale and proportions of the historic street pattern, which given the nature of many of Exmoor's settlements, may not always meet highways standards.

CE-D4: Extensions

- 7.79 Policy CE-D4 is very specific and sets out the National Park Authority's policy approach to extensions to existing buildings.
- 7.80 The policy is strongly positive in relation to the SA topic of **Landscape** as it requires extensions or alterations to buildings to complement the form, character and setting of the original building and be appropriate in terms of scale and massing.
- 7.81 The policy is also strongly positive in relation to the **Historic Environment** as it requires extensions to buildings to reflect and sustain the historic significance of the building through high quality design and the use of appropriate materials.
- 7.82 The policy is also positive in relation to **Housing** as it will ensure that extensions are undertaken in a sympathetic way, conserving the overall quality of the National Park's housing stock.
- 7.83 A neutral score was given in relation to the other SA topics.

CE-D5: Advertisements and private road signs

- 7.84 Policy CE-D5 sets out the approach to managing advertisements and private road signs within the National Park.
- 7.85 Policy CE-D5 scored strongly positive in relation to **Landscape** and **Historic Environment** as it recognises that traditional signage plays an important role in contributing to the character and historic environment of settlements, and seeks to ensure that there is no adverse effect (either individually or cumulatively) on landscape and distinctiveness including visual amenity and tranquillity. The policy requires no adverse impacts on landscape character and local distinctiveness and requires the advertisement or sign to be of a high standard and to conserve and enhance the appearance and character of the area. It also encourages the enhancement of existing buildings or the landscape through the consolidation, redesign or removal of existing advertisements or signage.
- 7.86 Policy CE-D5 also scored positively in relation to **Community and Wellbeing**, as it promotes amenity through design, and public safety. It includes a specific requirement for proposals to have no detrimental impact on public safety. Similarly it was positive for **Economy and Employment** as it recognises that private road signs can be important for visitor attractions and facilities. It was also positive for **Transport** as private road signs will be permitted in accordance with the policy.
- 7.87 For the remaining SA topics this policy was not considered to have particular relevance, and so was given a neutral score.

CE-D6: Shopfronts

- 7.88 CE-D6 is a very specific policy which relates to shopfronts in the National Park.
- 7.89 The policy is positive in relation to the **Landscape** as it requires traditional shopfronts to be retained and encourages appropriate restoration. Where shopfronts are replaced, the replacement must be appropriate in terms of the scale, colour, materials and design in order to enhance the character and appearance of the building and wider streetscape. These requirements are also likely to benefit the **Historic Environment** as well as the **Economy and Employment** as retaining the character of Exmoor's streetscapes will support the tourism industry.
- 7.90 For the remaining SA topics this policy was not considered to have particular relevance, and so was given a neutral score.

CE-S7: Small Scale Working or Re-working for Building and Roofing Stone

- 7.91 A number of Exmoor's older buildings were constructed of local stone. Policy CE-S7 therefore seeks to encourage the small scale working or reworking of quarries for building and roofing stone.
- 7.92 The policy was considered to be positive for all of the SA topics, apart from the **Coast** and **Housing**, where no specific implications were identified.
- 7.93 CE-S7 will be particularly important for the **Historic Environment**, as the provision of local stone adds to local character and distinctiveness and can be important to enable repair of heritage assets. However, care needs to be taken in re-opening former sites as they can be of interest themselves from a historic perspective. The policy refers to the restoration of sites but does not include opportunities for enhancing the historic environment or increasing understanding and enjoyment of this.
- 7.94 The hierarchical approach set out in the NPPF and referenced in the supporting text is to first reduce the quantity of material used and waste generated; then use as much recycled and secondary material as possible, before finally securing the remainder of material needed through new primary extraction. This will contribute to **Climate Change Mitigation and Energy** through reducing emissions. CE-S7 supports small scale extraction where this would reduce 'stone miles'. There is also reference to the avoidance of flood risk during operations, which is positive for the SA topic of **Climate Change and Adaptation to Flood Risk**.
- 7.95 In relation to **Biodiversity and Green Infrastructure**, CE-S7 requires that proposals should not adversely affect wildlife or geodiversity. Reworking of former sites may not always be appropriate due to the wildlife interest that has established, or because they are of interest from a geological perspective.
- 7.96 The policy includes safeguards to ensure that proposals and operations do not adversely affect **Landscape** and tranquillity. Similarly, in relation to **Land**, the policy requires the restoration of land after extraction ceases, and CE-S7 requires any waste to be reused or recycled.
- 7.97 There are also safeguards to ensure that there are no adverse impacts on **Community and Wellbeing**, setting out requirements for operations in relation to noise, dust, pollution and so on and ensuring that proposals do not adversely affect health. Restoration of sites could provide opportunities for recreation and enhanced understanding and enjoyment (including for educational purposes e.g. RIGS).

- 7.98 The provision of minerals is important for the **Economy and Employment**. CE-S7 allows for small scale sites where these support local employment. The use of local materials is also beneficial for the local economy and can help to retain local character and distinctiveness which support tourism.
- 7.99 The provision for small scale extraction would also be positive for **Transport**, where this would reduce stone miles. Even with small scale extraction there will be some lorry movements, although these should be minimal as the intention is to provide a local source of materials. The policy deals with any impacts that might arise such as noise, dust and the implications of traffic generation.

CE-S9: Mineral Development

- 7.100 Although there is a history of mineral working on Exmoor, there are no large scale mines or quarries in operation, and minerals assessments for Somerset and Devon indicate that there is no current requirement for them. Policy CE-S9 therefore sets out that mineral extraction developments, other than that permitted by policies CE-S7 and CE-D7 are not appropriate in the National Park unless in exceptional circumstances.
- 7.101 The policy is positive in relation to **Climate Change Mitigation and Energy**, as the hierarchical approach set out in the NPPF and referenced in the supporting text is to first reduce the quantity of material used and waste generated; then use as much recycled and secondary material as possible, before finally securing the remainder of material needed through new primary extraction. This will contribute to climate change mitigation through reducing emissions.
- 7.102 The policy is also positive for **Community and Wellbeing** as it states that mineral extraction is not likely to be appropriate in the National Park, which will be beneficial for communities as it will avoid impacts such as noise, dust, pollution and so on. Where the test for minerals development is met, the policy requires noise, dust and particle emissions to be controlled, mitigated or removed at source which would minimise amenity impacts on local communities.
- 7.103 The policy does not allow mineral developments other than in exceptional circumstances where it accords with the tests for major development, which will safeguard **Land** and **Landscape**. The policy requires the restoration of land after extraction ceases.
- 7.104 The restriction of minerals extraction is positive for **Transport**, as this avoids significant lorry movements, with associated impacts such as emissions, noise and dust as well as potential impacts on the road infrastructure such as historic bridges.
- 7.105 A neutral score was given in relation to **Economy and Employment**. The policy does not allow extraction other than in exceptional circumstances, which could be negative for the economy, as minerals have to be extracted where they are found. However the Local Aggregate Assessment for Devon and Somerset did not identify the need for extraction on Exmoor based on its geology, so negative impacts on the economy are not anticipated.
- 7.106 A positive score was given in relation to **Air Quality and Water Resources** - although the overall policy aim is to not allow mineral extraction within the National Park, if in exceptional circumstances this is allowed, there are safeguards to ensure that operations do not cause adverse impacts including in relation to dust and particle emissions.

- 7.107 A positive score was also given in relation to **Biodiversity and Green Infrastructure** as the policy specifies that sites should be restored in a way that will conserve and enhance biodiversity.
- 7.108 The measures in the policy to conserve and enhance local character will indirectly benefit the **Historic Environment**.
- 7.109 For the remaining SA topics this policy was not considered to have particular relevance, and so was given a neutral score.

CE-D7: Interim Development Order Permissions

- 7.110 There is one minerals permission in the National Park (for Barlynch Quarry) that has an Interim Development Order (IDO) permission, and Policy CE-D7 sets out the approach that will be taken, should a proposal come forward to reopen the site. IDO permissions will be subject to an Environmental Impact Assessment which will ensure any impacts on the environment are controlled and mitigated; therefore a range of positive effects are identified on the SA topics.
- 7.111 The policy requires particular regard to be paid to visual impacts on the **Landscape**; therefore the policy is positive in relation to that SA theme. The criteria in the policy also refer to impacts on ecology and archaeological and historical features; therefore the policy is also positive for **Biodiversity and Green Infrastructure** and **Historic Environment**.
- 7.112 There are also safeguards to ensure that there are no adverse impacts on **Community and Wellbeing**, setting out requirements for the potential effects on amenity to be considered, including noise, disturbance, pollution and the quiet enjoyment of the National Park.
- 7.113 The consideration that is given to the recreational use of the area means a positive impact on **Economy and Employment** is identified as this will help to ensure that activities do not detract from local tourism.
- 7.114 The policy is also positive for **Transport** as a criterion has been added in relation to access, traffic generation and highway safety.
- 7.115 For the remaining SA topics this policy was not considered to have particular relevance, and so was given a neutral score.

Recommendations

- 7.116 The following recommendation was made in relation to the policies for Conserving and Enhancing Exmoor in a draft version of the 2015 SA report:

CE-S2: Protecting Exmoor's Dark Night Sky

- It was recommended that reference should be 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. *This recommendation was addressed in the final version of the Publication Draft Local Plan (2015).*

8 Appraisal of Publication Draft Local Plan Policies – Chapter 5: Responding to Climate Change including Proposed Main Modifications

8.1 This Chapter covers the following Policies:

- CC-S1: Climate Change Mitigation and Adaptation
- CC-D1: Flood Risk
- CC-S2: Coastal Development
- CC-S3: Porlock Weir Coastal Change Management Area
- CC-S4: Replacement Development from Coastal Change Management Areas
- CC-D2: Water Conservation
- CC-S5: Low Carbon & Renewable Energy Development
- CC-D3: Small Scale Wind Turbines
- CC-D4: Freestanding Solar Arrays
- CC-S6: Waste Management
- CC-D5: Sewerage Capacity and Sewage Disposal
- CC-S7: Pollution

8.2 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 amendments to the justification text below Table 8.1 have been made to reflect the Proposed Main Modifications.

8.3 A summary of the scores for these Policies is given in **Table 8.1** overleaf.

Table 5 Summary score for Local Plan Policies – Chapter 5: Responding to Climate Change

SA Topics	SA Objectives	SA Objectives											
		CC-S1	CC-D1	CC-S2	CC-S3	CC-S4	CC-D2	CC-S5	CC-D3	CC-D4	CC-S6	CC-D5	CC-S7
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.	+	+	0	0	0	++	++	+	+	+	+	++
Biodiversity and green infrastructure	2) To conserve and enhance biodiversity and to protect, conserve and enhance all habitats and species.	+	+	+	0	+	++	++	0	+	+	+	+
Climate change and adaptation to flood risk	3) To minimise and manage the risk of all forms of flooding.	++	++	++	++	++	++	0	0	0	0	+	+
	4) To minimise the impacts of climate change on Exmoor's communities and habitats.	++	++	++	++	++	++	0	0	0	0	+	+
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.	++	+	0	0	0	0	+	+/-	+/-	+	0	+
Community wellbeing	6) To promote and support thriving and inclusive communities, health and wellbeing.	+	+	+	+	++	+	+/-	+/-	+/-	+	+	++
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.	+	+/-	+/-	+	+	+	+/-	+/-	+/-	+	0	+/-
Historic environment	8) To maintain and enhance the quality of the built environment.	+	0	+	0	0	+	++	0	+	+	0	0
Housing	9) To help ensure that National Park communities have access to appropriate, good quality, sustainable, affordable housing.	+	+/-	+	+	+	+	+	+	+	0	+	0
Land	10) To promote sustainable forms of development and sustainable use of natural resources.	+	+/-	0	0	0	+	+	0	0	++	+	++
	11) To reduce all forms of waste production and promote reuse and recycling and minimise the	+	+/-	0	0	0	+	+	0	0	++	+	++

SA Topics	SA Objectives	SA Objectives												
		CC-S1	CC-D1	CC-S2	CC-S3	CC-S4	CC-D2	CC-S5	CC-D3	CC-D4	CC-S6	CC-D5	CC-S7	
	risk of contaminated land.													
Landscape	12) To protect, maintain and enhance the special qualities of the Exmoor National Park's landscape character.	+	+	+	0	+	0	++	++	++	+	+	+	
Coast	13) To protect and/or enhance coastal areas.	+	+	++	++	++	0	0	+	+	0	+	+	
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.	0	0	0	0	+	0	+	+	0	+	0	+	

Overall assessment of Chapter 5: Responding to Climate Change

- 8.4 This chapter sets out the policy approach to responding to climate change through planning and development, both in terms of adaptation to the changes in climate that are already occurring, and climate change mitigation through reducing emissions of greenhouse gases by encouraging carbon storage (for example in peatlands) and reducing the demands for energy.
- 8.5 Overall, the policies are positive in relation to the natural and built environment, through recognising the implications of climate change on the landscape, wildlife and historic environment, and seeking to enable these to adapt, and 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.
- 8.6 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.
- 8.7 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 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.
- 8.8 There are both positive and negative implications for local communities 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.
- 8.9 The following sections set out the SA findings for each policy in more detail.

CC-S1: Climate Change Mitigation and Adaptation

- 8.10 This policy explains the response to climate change, both in terms of mitigating climate change through reducing greenhouse gas emissions, and building resilience by adapting to changes in climate that are already happening. The policy seeks to reduce greenhouse gas emissions and contribute to mitigating climate change including through promoting the energy hierarchy, water conservation, and carbon storage and sequestration. It also supports measures to adapt to climate change including avoiding development in areas of flood risk and promoting land management that reduces flood risk.

- 8.11 CC-S1 is strongly positive in relation to the SA topics of and **Climate Change and Adaptation to Flood Risk** and **Climate Change Mitigation and Energy** as it is specifically designed to address these issues.
- 8.12 CC-S1 identifies that the main sources of greenhouse gas emissions on Exmoor are from **Land** management including agricultural activity, land use change and forestry. It recognises the importance of land management to reduce flood risk and to sequester and store carbon. This is likely to also support soil quality and avoid erosion. The measures in the policy in relation to improving land management should also benefit the **Landscape**.
- 8.13 CC-S1 is positive in relation to **Air Quality and Water Resources** as it seeks to reduce greenhouse gas emissions and contribute to mitigating climate change. It promotes the energy hierarchy including through using low carbon and renewable energy, which will also improve air quality.
- 8.14 The policy is positive for the SA theme of **Biodiversity and Green Infrastructure** as the measures in the policy to improve the management of uplands and woodlands may have indirect benefits. Reducing the risk of flooding will also help to avoid habitat damage as a result of inundation in flood events.
- 8.15 The policy is also positive for **Community and Wellbeing** as reducing the risk of flooding will help to avoid the health and wellbeing impacts on people that can result from flood events. Similarly, the policy will have indirect benefits for **Economy and Employment** as reducing flood risk will benefit the local economy by protecting businesses.
- 8.16 While the policy does not make specific reference to the **Historic Environment**, managing and reducing flood risk will help to avoid flood events causing damage to heritage features and the policy is therefore positive for this SA topic.
- 8.17 CC-S1 specifies that the necessary coastal protection works will be facilitated through partnership working; therefore the policy is positive for the SA topic of **Coast**.
- 8.18 The policy is neutral in relation to **Transport**.

CC-D1: Flood Risk

- 8.19 CC-D1 sets out the approach to managing flood risk, taking into account the implications of climate change. The policy seeks 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 coastal change should be reduced by avoiding inappropriate development in vulnerable areas or adding to the impacts of physical changes to the coast.
- 8.20 CC-D1 was strongly positive for **Climate Change and Adaptation to Flood Risk** as the policy is aimed at managing flood risk. It identifies flood risk zones and applies the sequential test and exceptions test to avoid development in flood risk areas. Similarly, the policy recognises the risk of flooding at the **Coast**. It also requires that proposals are compatible with the Shoreline Management Plan (SMP), and reflects the approach to coastal change in SMP2 including natural coastal evolution along the Porlock shingle ridge. CC-D1 was also positive for **Community and Wellbeing** as it seeks to protect communities from flood risk. It also requires proposals not to increase the risk of flooding elsewhere. The supporting text refers

to flood watch areas which provide an early flood-warning system for communities at risk.

- 8.21 CC-D1 scored positively for **Biodiversity and Green Infrastructure**. The policy requires that proposals do not reduce the potential of land for current or future flood management, which would include flood meadows. The supporting text encourages good rural land management which includes creating new woodland and retaining water on lowland flood meadows.
- 8.22 The policy was also considered to be positive for **Landscape**, since although the policy does not directly address landscape issues, the support for natural processes and good rural land management (e.g. new woodland) will also be positive for landscape.
- 8.23 CC-D1 also scored positively for **Climate Change Mitigation and Energy and Air Quality and Water Resources**. The policy includes the incorporation of sustainable drainage systems to minimise surface run off and avoid pollution.
- 8.24 There are likely to be both positive and negative implications in relation to **Economy and Employment**. The policy seeks to protect businesses from flood risk. However, the restriction of development away from flood risk areas could limit some economic opportunities, for example tourism facilities. Similarly, the policy is positive in avoiding new **Housing** or change of use in areas of flood risk, and seeking to avoid increasing flood risk elsewhere. However, the policy is also a major constraint on housing provision in some settlements, given the scale of the flood zone/potential area of constraint, and the limited available sites for development. The policy requires that proposals do not reduce the potential of **Land** for current or future flood management. The text supports good rural land management which includes creating new woodland and retaining water on lowland flood meadows. However, the re-use of brownfield land could be restricted if it was also within an area of flood risk.
- 8.25 A neutral score was given in relation to **Historic Environment**, as the implications of flood risk for heritage assets have been covered in CC-S1. Similarly, a neutral score was given to **Transport**, as flood risk issues are dealt with in Chapter 10 of the draft Local Plan.

CC-S2: Coastal Development

- 8.26 CC-S2 recognises the importance and value of the coast, in landscape, wildlife and heritage terms, and in relation to the tourism economy. It seeks to avoid development on the coast unless it requires a coastal location, due to the physical vulnerability of coastal locations, and potential visual impacts.
- 8.27 CC-S2 scored strongly positive in relation to **Climate Change and Adaptation to Flood Risk**, as the policy is designed specifically to address these issues. Similarly, the policy scored strongly positive in relation to the **Coast** as it is aimed at responding to the potential effects of coastal change, and protecting vulnerable communities by directing development away from coastal areas at risk.
- 8.28 The policy scored positively for **Biodiversity and Green Infrastructure**. The supporting text recognises the importance of the coast for a range of habitats and species including a number of designations, and cross-refers to CE-S3 Biodiversity and Green Infrastructure. CC-S2 also seeks to protect the undeveloped nature of the coast, which will benefit biodiversity and requires development to not impact on biodiversity. Similarly, in relation to **Historic Environment**, the supporting text

recognises the importance of the coast for a range of heritage assets including a number of designations, and cross-refers to CE-S4 Cultural Heritage and Historic Environment, and the policy itself requires development to be appropriate to the character of the coastline and to not adversely affect heritage assets.

- 8.29 The policy also scored positively for **Landscape** as it requires development to be appropriate to the character and setting of the coastline.
- 8.30 The policy scored positively for **Community and Wellbeing** as the measures in the policy will reduce the number of people and community assets at risk from coastal change which could otherwise adversely affect health and wellbeing.
- 8.31 In relation to **Housing**, the policy restricts development in areas at risk from coastal change; however housing developed in those areas would not be high quality anyway and directing housing away from areas at risk from coastal change would benefit the quality of the overall housing stock.
- 8.32 There were both positive and negative implications for the SA topic of **Economy and Employment**. The policy is positive in seeking to avoid development (including of businesses) in areas at risk of coastal change. However, in accordance with policy CC-S2, development that takes place in coastal areas must require a coastal location (for example in relation to the marine sector, coastal tourism and so on) – this may be a constraint to other types of businesses in the named settlements on the coast, which may not specifically require a coastal location.
- 8.33 The policy was considered to be neutral in relation to the SA topic **Climate Change Mitigation and Energy**, as it is primarily about climate change adaptation, and does not specifically address climate change mitigation. The policy was also neutral in relation to **Land, Air Quality and Water Resources** and **Transport**.

CC-S3: Porlock Weir Coastal Change Management Area

- 8.34 Policy CC-S3 relates specifically to the Porlock Weir Coastal Change Management Area and the criteria that will apply to development proposals in that identified area.
- 8.35 CC-S3 scored strongly positive for **Coast** as it seeks to ensure that development in the area at risk from coastal change is appropriate and that the impacts of coastal change in terms of material assets are managed as far as possible. The policy also scored strongly positive in relation to **Climate Change and Adaptation to Flood Risk**.
- 8.36 The policy is positive in relation to **Housing** as it seeks to ensure that housing is not built in areas at risk from coastal change, and also in relation to **Economy and Employment** as it sets out criteria for allowing appropriate businesses that would benefit the local economy in the coastal change management area.
- 8.37 The policy is positive in relation to **Community and Wellbeing** as it will help to protect communities from increased risk in relation to coastal change, and permits key community infrastructure development in the coastal change management area in certain circumstances.
- 8.38 The policy is neutral in relation to **Air Quality and Water Resources, Biodiversity and Green Infrastructure, Climate Change Mitigation and Energy, Historic Environment, Land, Landscape** and **Transport**.

CC-S4: Replacement Development from Coastal Change Management Areas

- 8.39 Policy CC-S4 sets out criteria for new development what would replace development that is at risk from coastal change.
- 8.40 The policy is strongly positive for the SA theme of **Coast** as it specifically aims to address the impacts of coastal change by facilitating appropriate replacement development. It is also strongly positive for **Community and Wellbeing** as it allows for the relocation of homes and community infrastructure that is at risk from coastal change. The policy specifies that development can be replaced where it is important to the wellbeing of the coastal community affected. CC-S4 is also positive for **Housing** as it permits the relocation of residential properties, in accordance with the specified criteria.
- 8.41 CC-S4 is also strongly positive for **Climate Change and Adaptation to Flood Risk** as its primary purpose is to adapt to the risks of coastal change by setting out a policy framework for the relocation of vulnerable development. This means the policy is also positive for **Economy and Employment** as it will facilitate the relocation of economic assets and business premises where appropriate.
- 8.42 The policy specifies that the relocation of development must not have unacceptable adverse impacts on the landscape, biodiversity, built environment, townscape or local communities. Therefore, the policy is positive for the SA themes of **Biodiversity and Green Infrastructure** and **Landscape**.
- 8.43 The policy is neutral for **Air Quality and Water Resources, Climate Change Mitigation and Energy, Historic Environment, Land** and **Transport**.

CC-D2: Water Conservation

- 8.44 The National Park is an important source of water for communities both within and outside the National Park. The catchments on Exmoor supply drinking water to over half a million people including in Tiverton, Exeter and Taunton. Growth in settlements outside the National Park could increase demands for water from Exmoor and emphasise the importance of water conservation. The National Park's popularity as a tourist destination, along with many other parts of the South West, also increases demand for water supplies, particularly during the summer months. Careful management and protection of these water catchments is important to ensure that their ability to provide ecosystem services including capturing and storing rainfall, managing flood risk, water cycling, the supply of clean, fresh water, and support for wildlife habitats and species are not compromised.
- 8.45 CC-D2 scored strongly positive for **Air Quality and Water Resources, Biodiversity and Green Infrastructure**, and **Climate Change and Adaptation to Flood Risk**. The policy is intended to support the conservation of water resources, recognising the multiple benefits and 'ecosystem services' provided by water catchments on Exmoor. These benefits include the supply of clean drinking water, flood attenuation and biodiversity. The supporting text identifies the importance of water for biodiversity, both in terms of water quality and quantity to support water dependent species and wetland habitats. It also refers to water resource management plans which water companies are required to prepare to assess long term water demands and the availability of water for this. These plans have to take account of climate change implications e.g. implications of hotter drier summers. CC-D2 requires proposals to incorporate water conservation measures including minimising demand, recycling and storing water, and retrofit where appropriate. It

also supports on-farm water storage, bearing in mind climate change and the likely future demands for water. Proposals which could adversely affect fisheries, recreational or nature conservation interests will not be supported.

- 8.46 CC-D2 scored positively for **Community and Wellbeing**, and **Economy and Employment**. The policy aims to support the supply of clean, fresh water to local communities as well as providing other benefits such as managing flood risk. It covers public and private water supplies. Exmoor provides water for local businesses, although there are not any major industries which have heavy water demands. There are seasonal peaks in water demand due to the tourism industry, which is taken account of in water company water resource management plans. The supporting text notes that water supplies are also important for agriculture. CC-D2 requires proposals to incorporate water conservation measures including minimising demand, recycling and storing water, and retrofit where appropriate. Proposals which could adversely affect existing supplies or recreational interests will not be supported.
- 8.47 CC-D2 also scored positively for **Historic Environment**, and **Housing**. CC-D2 requires proposals to incorporate water conservation measures including minimising demand, recycling and storing water, and retrofit where appropriate. Retrofitting on listed buildings would require listed building consent, and on traditional buildings would need to not cause harm to the historic fabric of the building. This is recognised in the supporting text.
- 8.48 CC-D2 scored positively for **Land**. The policy highlights the water catchments on Exmoor and their role in capturing and storing rainfall. The supporting text highlights the emphasis on conserving water resources on Exmoor including managing water on a catchment basis.
- 8.49 No specific implications were identified for the remaining topics of **Landscape**, **Climate Change Mitigation and Energy**, **Coast** and **Transport**.

CC-S5: Low Carbon and Renewable Energy Development

- 8.50 CC-S5 sets out in detail the specific approach to renewable energy within the National Park. The policy highlights National Park Authorities' role as exemplars of sustainability in responding to climate change, including promoting energy efficiency and the generation of renewable energy, whilst not compromising their overriding duty under the 1949 Act. It recognises that the National Parks offer important opportunities for a range of renewable energy technologies, including biomass (woodfuels), micro-hydro, anaerobic digestion (which will also reduce waste), wind and solar power installations, and that the use of renewable technologies on Exmoor has been encouraged through the Carbon Neutral Exmoor programme. However, it seeks to balance an overall positive approach to renewables with the national value of the landscape, and potential impacts on its special qualities including wildlife and cultural heritage.
- 8.51 CC-S5 is strongly positive for **Air Quality and Water Resources**, as it aims to promote low carbon development and the use of renewable energy, which will reduce emissions of greenhouse gasses and improve air quality. The consideration of potential impacts covers air and water quality, including potential impacts on air quality from biomass and the impacts of hydro schemes on water quality and resources. The policy requires that any proposals conserve the amenity of the area including air and water quality.

- 8.52 CC-S5 is strongly positive for **Biodiversity and Green Infrastructure**. The supporting text states that proposals likely to have an adverse effect on designated wildlife sites will not be granted, and that careful consideration should also be given to Local Wildlife Sites. The supporting text cross-refers to other biodiversity policies and states that proposals may require ecological surveys or EIAs. The potential impacts on wildlife are set out. The policy requires that proposals do not compromise the wildlife of the National Park and promotes environmental enhancement which could include biodiversity enhancements.
- 8.53 CC-S5 is strongly positive for **Historic Environment**. The supporting text refers to the protection of designated heritage assets and consideration of potential impacts on cultural heritage is required. It advises that archaeological or historic environment surveys or investigations may be required. The policy requires that proposals do not compromise the cultural heritage of the National Park and promotes environmental enhancement which could include heritage assets.
- 8.54 CC-S5 is strongly positive for **Landscape**. The potential landscape, tranquillity and visual impacts of renewable energy schemes are set out. The policy requires proposals to be compatible with the landscape character and avoid the most sensitive landscapes; to not compromise the natural beauty of the National Park; promotes environmental enhancement; conserves the amenity of the area including landscape and tranquillity; and requires reinstatement of the site once the use has ended. There is also reference to impacts on the National Park and its setting.
- 8.55 CC-S5 scored positively for **Climate Change Mitigation and Energy** as the policy is aimed at mitigating climate change through promoting renewable energy. However, the policy does not set any targets for Renewable Energy generation or local standards for incorporating renewable energy technologies within developments, which is why the policy is scored as positive rather than strongly positive.
- 8.56 CC-S5 scored positively for **Housing** as it supports sustainable housing through the promotion of renewable energy technologies which will provide alternative sources of electricity and heat for households and potentially help address fuel poverty, particularly with the rising costs of fossil fuels. CC-S5 also scored positively for **Land** as most proposals will either be associated with existing buildings (e.g. Anaerobic Digestion or biomass plants on farms, or domestic solar thermal and PV panels), or require minimal land take (e.g. wind turbines). The supporting text also makes reference to biomass and anaerobic digestion plants within the range of renewable energy technologies, which could provide a sustainable way of managing residual municipal waste and agricultural wastes.
- 8.57 CC-S5 scored positively for **Transport**, with the potential impacts of renewable energy developments on recreation and access, and the transport and traffic implications of renewable energy schemes being included in the issues to be considered. CC-S5 requires proposals to conserve the amenity of the area including in relation to access and recreation and traffic generation.
- 8.58 There were considered to be both positive and negative implications for **Community and Wellbeing**. The policy and text highlight the potential community benefits from renewable energy schemes, and also cover potential impacts of noise, tranquillity and shadow flicker, which will benefit communities. The supporting text and CC-S5 promote environmental enhancement or community benefits wherever possible. However, the restrictions on potential renewable energy technologies particularly their size and scale due to the National Park purposes is likely to limit

potential community schemes e.g. wind turbines which have to be of a certain size to be viable.

- 8.59 There were also considered to be both positive and negative implications for the **Economy and Employment**. The supporting text recognises the potential benefits for local jobs from suppliers and installers of renewable energy technologies. CC-S5 supports proposals that meet business energy needs. However, the text specifically excludes large and medium scale renewable energy projects as they are not compatible with National Park purposes, and the policy relates to small scale renewable energy proposals only. This could lead to opportunities for economic benefit and jobs being lost.
- 8.60 CC-S5 was considered to be neutral in relation to **Climate Change and Adaptation to Flood Risk**. The policy is primarily about climate change mitigation, and the policy and text do not specifically relate to climate change adaptation or flood risk.
- 8.61 CC-S5 was considered to be neutral in relation to the **Coast**. Any renewable energy proposals on the coast would need to be assessed in accordance with the policy, including impacts on landscape, wildlife, cultural heritage and so on. Impacts of marine renewable energy proposals such as offshore wind turbines on the setting of the National Park or views from it would not be covered by the planning system, although the National Park Authority may wish to comment on applications to the Crown Estate. The main implications from a planning perspective are likely to be the impacts of any landfall grid connection from offshore schemes.

CC-D3: Small Scale Wind Turbines

- 8.62 The renewable energy resource assessment identified a good wind resource for Exmoor. However, the Exmoor National Park Partnership Plan 2012-17¹³ recognises that wind turbines can, individually and cumulatively, erode the unspoilt, uncluttered nature of the landscape and they can have a detrimental impact on tranquillity. The potential for exploiting the wind resource is likely to be limited by the need to ensure that turbines do not detract from the statutory purposes to conserve the natural beauty, wildlife and cultural heritage of the National Park. CC-D3 provides the criteria against which wind turbine applications will be assessed. It focuses on small scale wind turbines (up to a maximum of 20m to rotor tip), as larger turbines are considered to be inappropriate within the National Park. It may be possible for individual small scale wind turbines to be assimilated within some landscape types with good siting, screening and design. Other landscape types may be so sensitive that will not be appropriate to have any turbines.
- 8.63 CC-D3 scored strongly positive for **Landscape** as the policy is intended to ensure that the National Park purposes relating to natural beauty are not compromised by wind turbines. This is the main factor behind preventing wind turbine development in Landscape Character Types A: High Coastal Heaths and D: Open Moorland and limiting wind turbines to a height of 20m or less, as such turbines can be assimilated into some landscapes particularly where they are associated with existing buildings or screened by trees for example. The supporting text states that some landscapes such as moor and heath are so sensitive to intrusive development from vertical structures due to their open vistas and wild character that it may not be acceptable to have any turbines. The criteria in the policy include an assessment of cumulative

¹³ Exmoor National Park Partnership Plan 2012-2017

impacts and aim to ensure that there is no unacceptable landscape or visual impact resulting from the development.

- 8.64 CC-D3 scored positively for the **Coast**. Although the coast is not specifically referenced, any renewable energy proposals on the coast would need to be assessed in accordance with the policy, including impacts on landscape. Some coastal landscapes may be so sensitive to intrusive development, such as Landscape Character Type A: High Coastal Heaths, from vertical structures that it may not be acceptable to have any turbines.
- 8.65 A positive score was given in relation to **Air Quality and Water Resources**, as renewable energy from wind turbines would reduce emissions of greenhouse gases, and this policy seeks to enable small scale wind turbines where these are acceptable in relation to National Park purposes. The policy does not specifically refer to impacts on air or water quality, although it is unlikely that individual wind turbines would have significant implications for these resources.
- 8.66 CC-D3 was also considered to be positive in supporting sustainable **Housing** through the promotion of renewable energy technologies which will provide alternative sources of electricity for households and potentially help address fuel poverty, particularly with the rising costs of fossil fuels.
- 8.67 CC-D3 scored positively for **Transport**. The implications of renewable energy proposals for transport are identified and the supporting text requires proposals to assess impacts of the turbine along with any required infrastructure including road access during construction to ensure that access to the site can be provided without damage to rural roads or historic bridges. Potential impacts on the rights of way and access network are also considered including the effects of shadow flicker or noise from the wind turbines on access routes (e.g. bridleways or footpaths) which could detract from the enjoyment of National Park users.
- 8.68 In relation to **Climate Change Mitigation and Energy**, Policy CC-D3 was given a mixed score as there were both positive and negative implications. The policy is aimed at mitigating climate change through promoting renewable energy. However, the policy restricts proposals to small scale wind turbines under 20m, and the text states that large or medium scale turbines are not considered acceptable due to conflicts with National Park purposes and specifically impacts on landscape and visual amenity. This will significantly reduce the opportunities for the generation of renewable energy from wind, and therefore reduce the potential carbon savings.
- 8.69 A range of positive and negative implications were also identified for **Community and Wellbeing** and **Economy and Employment**. The policy could benefit smaller communities (including those in isolated hamlets) and local businesses as it allows for turbines that serve groups of properties (which could include residential, commercial or employment properties). The policy requires that there are no adverse impacts on amenity including effects of shadow flicker and noise on nearby properties, and that public safety is not compromised. The policy also requires that the location does not conflict with the use of the area for recreation and access. The potential implications for local communities and for recreation and access should be assessed. The main modifications to the supporting text state that applicants will be expected to demonstrate that, following consultation, the issues identified by affected local communities and 'communities of interest' such as users of the National Park have been fully addressed. However, the restrictions on potential renewable energy technologies particularly their size and scale is likely to

limit economic opportunities and would also exclude potential community schemes as wind turbines would have to be larger to be viable.

- 8.70 The policy is primarily about climate change mitigation and does not specifically relate to **Climate Change and Adaptation to Flood Risk**, so a neutral score was given. Similarly, a neutral score was given for **Land** as the small scale wind turbines require minimal land take. CC-D3 scored neutral for **Biodiversity and Green Infrastructure** and **Historic Environment** as the policy does not relate directly to these issues.

CC-D4: Freestanding Solar Arrays

- 8.71 Policy CC-D4 Freestanding Solar Arrays responds to the increasing number of applications that the National Park Authority is receiving for stand-alone or ground-mounted solar panels. This is partly due to the sensitivity of traditional buildings in the National Park to roof mounted panels. However, the size and scale of some proposals has caused concern over visual impacts, particularly if the panels are located in fields away from existing buildings. The policy therefore sets out the criteria to guide the sorts of applications that would be acceptable within the National Park.
- 8.72 CC-D4 scored strongly positive for **Landscape** as the policy is intended to ensure that the National Park purposes relating to landscape are not compromised by the potential visual and landscape impacts of stand-alone solar arrays. The policy requires that freestanding solar arrays are not sited within Landscape Character Type A: High Coastal Heaths and D: Open Moorland. The policy goes on to state that freestanding solar arrays would need to be appropriate in scale and in proportion with the property; suitably sited and screened to avoid intrusive visual or landscape impact; and the design, colour and choice of materials minimises any visual impact, ground mounted arrays sited in isolation from existing built form will not be permitted due to landscape and visual impacts.
- 8.73 CC-D4 scored positively for the SA topics of **Air Quality and Water Resources**, and **Biodiversity and Green Infrastructure**. Renewable energy from solar arrays would reduce emissions of greenhouse gases, and this policy seeks to enable small scale solar arrays where these are acceptable in relation to National Park purposes. The policy requires proposals to avoid impacts on wildlife and land of high ecological interest and whilst it does not specifically refer to impacts on air or water quality, it is unlikely that solar arrays would have significant implications for these resources.
- 8.74 CC-D4 scored positively for **Historic Environment**. The policy requires that freestanding solar arrays do not harm the significance and setting of listed buildings or other heritage assets, or cause damage to archaeological interests.
- 8.75 CC-D4 scored positively for **Housing** as the promotion of renewable energy technologies will provide alternative sources of electricity for individual households and potentially help address fuel poverty, particularly with the rising costs of fossil fuels. As well as individual properties, the policy and supporting text also refer to groups of properties – solar arrays serving a group of properties such as groups of social housing could be appropriate where ground mounted panels are preferable to roof mounted ones for landscape or visual amenity reasons.

- 8.76 CC-D4 solar arrays scored positively for the **Coast**. Although the coast is not specifically referenced, any renewable energy proposals on the coast would need to be assessed in accordance with the policy, including impacts on landscape.
- 8.77 In relation to **Climate Change Mitigation and Energy**, Policy CC-D4 was given a mixed score as there were both positive and negative implications. The policy is aimed at mitigating climate change through promoting renewable energy. However, the policy restricts proposals to small scale solar arrays due to conflicts with National Park purposes and specifically impacts on landscape and visual amenity. This will significantly reduce the opportunities for the generation of renewable energy, and therefore reduce potential carbon savings.
- 8.78 There were positive and negative implications in relation to **Community and Wellbeing** and **Economy and Employment**. The policy relates to freestanding solar arrays serving individual properties which could be residential, commercial or employment properties. This could include community buildings such as village halls. However, the restrictions on size and scale could limit potential community schemes and affect their viability as well as constraining economic opportunities.
- 8.79 CC- D4 was considered to be neutral in relation to **Land**. There will be some land-take, but the policy is mainly restricted to small scale arrays, (although the supporting text does refer to some circumstances where larger scale arrays may be acceptable). In some circumstances it may be possible to still use the land for agricultural use, for example grazing for sheep.
- 8.80 There are unlikely to be any implications relating to **Transport** and there were not considered to be any specific issues relating to **Climate Change and Adaptation to Flood Risk** as the policy is primarily about climate change mitigation.

CC-S6: Waste Management

- 8.81 Policy CC-S6 sets out the planning policy for waste management including anaerobic digestion.
- 8.82 The policy was considered to be strongly positive in relation to the SA topic of **Land**, as large scale waste facilities will not be permitted, which will safeguard land. The policy also applies the waste hierarchy which will also reduce land-take as it seeks to reduce the generation of waste in the first instance, and consider reuse, recycling or recovery before disposal is considered as the last resort. Proposals for small scale reuse, recycling and anaerobic digesters dealing with a mixed waste stream will be permitted but only to serve the needs of the local community or farm(s). Construction and demolition waste should be managed on site, unless there is a risk to the environment or communities, when off-site disposal will be permitted.
- 8.83 The policy was considered to be positive for **Air and Water Quality, Landscape and Biodiversity and Green Infrastructure**. Large scale waste facilities will not be permitted, which will safeguard air and water quality, landscape and wildlife. Construction and demolition waste should be managed on site, unless there is a risk to the water environment or wildlife, when off-site disposal will be permitted. Agricultural waste including manure and slurry can be a pollution risk and are also odorous, but reference is made to CC-S5 Pollution in the supporting text. Appropriate restoration and after-use of sites is required to achieve National Park purposes. Restoration could provide benefits for landscape character, biodiversity and green infrastructure.

- 8.84 The policy approach follows the national waste hierarchy which will contribute to positive effects on **Climate Change Mitigation and Energy**. Anaerobic digestion is a source of low carbon energy, and provided there is not a lot of additional waste being transported in, this will also contribute to climate change mitigation.
- 8.85 CC-S6 is also positive for **Community Wellbeing** and **Economy and Employment**. The role of local communities in applying the waste hierarchy is recognised, and large scale waste facilities will not be permitted, which will avoid significant impacts on local communities and will not detract from the qualities that encourage tourism. There is no adverse impact on the economy as waste is dealt with outside the National Park. Proposals for small scale reuse, recycling and anaerobic digesters dealing with a mixed waste stream will be permitted to serve the needs of the local community or farm businesses.
- 8.86 The policy is positive for **Transport** as importation of waste/feedstock for anaerobic digesters is only permitted from within the National Park or from parishes adjoining the National Park. Allowance for small scale facilities to serve local community or farm needs will reduce the need to travel. Design of new development should take into account access requirements for waste operators.
- 8.87 A neutral score was given for the **Historic Environment**. Overall, heritage assets will be safeguarded by the policy, particularly as large scale waste facilities will not be permitted. While the onsite management of construction and demolition waste could potentially be damaging to the historic or built environment or its setting, the policy only requires this where there would be no harmful impacts.
- 8.88 No specific implications were identified for the SA topics of **Climate Change and Adaptation to Flood Risk, Coast or Housing**.

CC-D5: Sewerage Capacity and Sewage Disposal

- 8.89 Policy CC-D5 Sewerage Capacity and Sewage Disposal addresses requirements for sewerage capacity and sewage disposal within the National Park. It seeks to avoid negative impacts on the environmental quality of land, air and water; public health and amenity; and to provide appropriately for new or extended sewage infrastructure.
- 8.90 CC-D5 scored positively in relation to **Air Quality and Water Resources** as the policy is intended to manage sewage disposal and sewerage capacity to ensure that the environmental quality of air and water are not exceeded. It also scored positively for **Climate Change and Adaptation to Flood Risk**. CC-D5 states that development will be permitted where it can be demonstrated that the facility will pose no unacceptable harm to environmental quality (including air, water and land). Environmental impacts such as emissions and discharges are controlled under other legislation. CC-D5 requires that proposals include the use of necessary mitigation measures to avoid impacts on surrounding areas including air and water pollution. However, many households are served by septic tanks, which can be the cause of local pollution incidents. There are also risks of pollution from septic tanks in areas where there is a high water table or if the site is susceptible to flooding. The supporting text highlights that climate change impacts could include increased risks of flooding, causing pollution from overflow from non-mains drainage and highlighting that flood resilience measures to avoid overflows are required. The supporting text identifies that sewage treatment plants are classified as 'less vulnerable' development in areas of flood risk. Therefore provided adequate pollution control measures are in place, sewage transmission infrastructure such

and pumping stations are seen as water compatible development (see CC-D1 Flood Risk). The impact on water quality is a key consideration for applications regarding sewerage works. The supporting text encourages the recycling and reuse of rainwater and greywater which helps to minimise risks of overloading sewage works and cross-refers to CC-D2 Water Conservation.

- 8.91 CC-D5 scored positively for **Community and Wellbeing** as the policy provides for a community service – sewage disposal. It is intended to avoid detrimental impacts on public health and amenity including nuisances such as odour. The policy also prevents development such as housing near to sewage treatment works. The policy also scored positively for **Coast**, with reference to the risks of flooding and the need to incorporate climate change flood resilience measures to avoid overflows, which could help to improve bathing water quality at the coast.
- 8.92 CC-D5 also scored positively for **Land and Landscape**. The policy is intended to manage sewage disposal and sewerage capacity to ensure that detrimental impacts on amenity and the environmental quality of land are avoided through the appropriate treatment and disposal of sewage waste. CC-D5 requires the appropriate location, scale and design of facilities, and the use of necessary mitigation measures to avoid impacts on surrounding areas including soil. The explanatory text identifies that additional sewage facilities or the expansion of existing facilities may be required during the plan period, which could require land-take, but these are likely to be small scale due to the size of the population. The policy approach is to encourage efficient use of existing sewerage infrastructure, which reduce the need for land-take. The scale, siting and appearance of sewerage works are important to ensure that what may otherwise be intrusive development is acceptable in the National Park. The proliferation of small private sewage treatment plants should be avoided for reasons including landscape impact.
- 8.93 CC-D5 was given a neutral score for **Biodiversity and Green Infrastructure**. The management of sewage disposal is important to maintain water quality and aquatic species. Sewage pollution incidents can kill fish due to lack of oxygen in the water. The policy is aimed at protecting environmental quality including water quality, which will also benefit biodiversity.
- 8.94 CC-D5 was given a negative score in relation to **Housing**, as the policy could potentially result in proposals for affordable housing being refused due to proposals only being permitted where the existing sewerage infrastructure has the capacity, or measures can be put in place, to cope with additional demands. Housing development in particular can increase the risk of water quality being affected due to extra loads being placed on sewage works. The policy requires arrangements to be made to ensure that the sewage infrastructure can manage the additional required capacity of a proposal before development is occupied or activated; however where this cannot be achieved the policy could be restrictive to new development including that of affordable housing (which is otherwise acceptable). Alternative measures such as the provision of septic tanks, could be considered in order enable the affordable housing to be permitted.
- 8.95 No specific implications were identified in relation to **Climate Change Mitigation and Energy; Economy and Employment; Historic Environment, and Transport**.

CC-S7: Pollution

- 8.96 Policy CC-S7 Pollution seeks to ensure that new and existing development does not contribute to pollution, and that it is not adversely affected or put at risk by unacceptable levels of pollution. It covers pollution to land, air, water or noise.
- 8.97 CC-S7 was strongly positive in relation to **Air Quality and Water Resources**. The supporting text sets out the context relating to air quality. There are no Air Quality Management Areas within the National Park and the text recognises that the small scale of development is unlikely to cause significant impacts on air quality, although there could be cumulative impacts arising from traffic and energy generation. Opportunities for sustainable transport measures and energy efficiency or renewable energy generation in development will therefore be important considerations. The supporting text also set out the context relating to water quality. It identifies the importance of clean water resources for drinking water supply, nature conservation, fisheries and amenity value. Diffuse pollution and point source pollution including from agricultural activities, sewage discharge, accidental spillage etc. need to be avoided. Climate change can also exacerbate these problems through low rainfall or flooding. Reference is made in the policy to Groundwater Protection Zones, which are designated to prevent contamination of drinking water supplies by placing constraints on the types of development allowed within the zones. Proposals should avoid pollution where possible by using preventative measures and applicants are encouraged to discuss potential pollution risks at an early stage with the National Park Authority and Environment Agency as a key stakeholder. Where pollution cannot be avoided, proposals will need to demonstrate that there are no unacceptable adverse impacts either individually or cumulatively on the environment. Proposals that improve the quality of the surrounding environment will be more favourably considered.
- 8.98 CC-S7 was strongly positive in relation to **Community and Wellbeing**. The purpose of the policy is to avoid pollution which can lead to detrimental impacts to quality of life and cause health issues. Pollution control aims to prevent pollution and ensuring that air and water quality meet standards that guard against impacts to human health. Air quality is important for human health and is generally good on Exmoor, with no Air Quality Management Areas identified, although ground level ozone levels can occasionally reach high levels which can be detrimental to human health, although this is mainly caused by atmospheric conditions and is not something that policy can control. Pollution can cause unpleasant odours which can impact on neighbouring properties. The impact of noise is a material consideration in determining planning applications and development generating intrusive noise would not be permitted where it would have a significant adverse impact on health, quality of life or amenity. Land contamination can impact on human health and proposals for development such as housing, schools, nurseries or allotments would need to take particular account of the type of contamination and the remediation required. CC-S7 requires contaminated land to be remediated before development proceeds. Exmoor's clean water resource is vital for drinking water supplies. The potential impacts on areas outside the National Park are identified – this could also reference local communities, and partnership working with neighbouring authorities is important.
- 8.99 CC-S7 was strongly positive in relation to **Land** as the policy covers land contamination and requires remediation before any development proceeds. Different types of contamination are identified and the supporting text recognises that a site specific approach to remediation will be necessary. Soil pollution can

arise from different sources including agricultural activities and fuel storage. Mineral extraction and waste disposal can cause pollution both directly and indirectly (for example traffic) and impacts will need to demonstrate any pollution is kept to an acceptable level.

- 8.100 CC-S7 scored positively for **Biodiversity and Green Infrastructure**. The supporting text identifies that Exmoor's habitats and wildlife can be damaged by pollution and recognises the importance of good air quality for sensitive habitats including Exmoor's internationally important heathlands and oak woodlands, (although air pollution is mainly caused by pollution laden winds from areas outside the National Park). Contaminated land can lead to a number of issues including impacts on the natural environment where pollution affects ecosystems and wildlife populations. Clean water resources are also important for nature conservation, and Exmoor's river corridors provide important wildlife habitats. Good design can limit the impact of light pollution on nature conservation. Consideration of the impact of noise on Exmoor's special qualities and environment would need to cover wildlife impacts. Further information on the impact of pollution on Natura 2000 sites is provided by the Exmoor National Park Publication Draft Local Plan Habitat Regulations Assessment. CC-S7 seeks to avoid pollution through partnership working. Where this cannot be achieved, proposals will need to demonstrate that there are no unacceptable adverse impacts either individually or cumulatively on the environment, including biodiversity. Proposals that improve the quality of the surrounding environment will be more favourably considered.
- 8.101 CC-S7 was considered to be positive in relation to **Climate Change and Adaptation to Flood Risk and Climate Change Mitigation and Energy**. The supporting text highlights that climate change is likely to add to the issue of low water flows which can lead to poor water quality. Pollution can be reduced by the actions of individuals e.g. car sharing, using sustainable transport modes, which will also support climate change mitigation. Cross reference is made to other relevant policies including AC-S1 Sustainable Transport which seeks to reduce pollution through sustainable travel plans, and CC-S1 Climate Change Mitigation and Adaptation. Emissions of greenhouse gases from development is an issue not only locally but in a wider context, and identifies measures to improve air quality including energy efficiency measures in building design and construction and the use of low carbon renewable energy sources. Design considerations can help to minimise energy loss and thus carbon emissions as well as other environmental pollutants. The elimination of unnecessary artificial lighting can have other benefits of reducing carbon emissions.
- 8.102 CC-S7 was also positive for **Landscape**. The supporting text identifies that Exmoor's special qualities including tranquillity and dark night skies can be damaged by noise and light pollution. Pollution can be minimised by good design can limit the impact of light pollution and through the actions of individuals e.g. minimising artificial lighting. CC-S7 requires proposals to avoid pollution and where this cannot be achieved, to demonstrate that there are no unacceptable adverse impacts either individually or cumulatively on the environment, including landscape and tranquillity. Proposals that improve the quality of the surrounding environment will be more favourably considered.
- 8.103 CC-S7 scored positively for **Transport**. Air quality in particular can be impacted by emissions from traffic. Air quality is generally good in the National Park and the support text recognises that the small scale of development is unlikely to cause significant impacts on air quality, although there could be cumulative impacts arising

from traffic and energy generation. Opportunities for sustainable transport measures will therefore be important considerations. The supporting text identifies additional pollution generated by road traffic and recognises that pollution can be reduced by the actions of individuals e.g. car sharing, using sustainable transport modes and through sustainable travel plans, cross referring to AC-S1 Sustainable Transport. Where pollution cannot be avoided, proposals will need to demonstrate that there are no unacceptable adverse impacts either individually or cumulatively on the environment, which would include consideration of the cumulative impacts of emissions from traffic.

- 8.104 There are both positive and negative implications for **Economy and Employment**. The aim of the policy is to avoid pollution and impacts on environment and quality of life. The high environmental quality of the National Park is what attracts visitors, and so is important for the tourism and recreation sectors. However, restrictions on certain types of development which may include pollution risks could restrict economic and employment opportunities, for example around Groundwater Protection Zones or certain agricultural activities such as silage effluent, milk and slurry. The mitigation of noise pollution recognises that existing businesses should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established.
- 8.105 A neutral score was given in relation to the **Coast**. Bathing water quality is affected by diffuse pollution and sewage and can be impacted by point source pollution incidents; however this is recognised in the supporting text.
- 8.106 There were not considered to be any relevant issues relating to the SA topics of **Historic Environment**, or **Housing**.

Recommendations

- 8.107 The following recommendation was made in relation to the policies for Responding to Climate Change in a draft version of the 2015 SA report:

CC-S7: Pollution

- It was recommended that the supporting text to the policy makes reference to the potential impacts of diffuse pollution and sewage on bathing water. *This recommendation was addressed in the final version of the Publication Draft Local Plan (2015).*

9 Appraisal of Publication Draft Local Plan Policies – Chapter 6: Achieving a Thriving Community including Proposed Main Modifications

9.1 This Chapter covers the following Policies:

- HC-S1: Housing
- HC-DX: Vacant Buildings in Settlements
- HCS2: A Balanced Local Housing Stock
- HC-S3: Local Occupancy Criteria
- HC-S4: Principal Residence Housing
- HC-D1: Conversions to Dwellings in Settlements
- HC-D2: New Build Dwellings in Settlements
- HC-D3: Specialist Housing for Exmoor’s Communities
- HC-D4: Extended Family Dwellings Criteria
- HC-D5: Custom/Self Build Local Need Housing in Rural Communities
- HC-D7: Conversions to Dwellings in the Open Countryside
- HC-D8: New Build Dwellings in the Open Countryside
- HC-D9: Rural workers
- HC-D10: Succession Farming – Second Dwellings on Established Farms
- HC-D11: Residential Caravans
- HC-D12: Replacement of Rural Workers Occupancy Conditions
- HC-D13: Replacement of Holiday Occupancy Conditions and Extended Family Ties
- HC-D14: Subdivisions of Existing Dwellings
- HC-D15: Residential Extensions
- HC-D16: Outbuildings
- HC-D17: Replacement Dwellings
- HC-S5: Travelling Communities
- HC-S6: Local Commercial Services and Community Facilities
- HC-D18: Local Commercial Service Provision
- HC-D19: Safeguarding Local Services and Community Facilities
- HC-D20: Important Visual Amenity Space
- HC-S7: Residential Institutions

- 9.2 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. Other changes made were to simplify policies and avoid repetition, to bring the policy in line with NPPF or to make policy wording consistent with other Local Plan policies. Even where the policy names and numbers have not changed, in some cases there have been changes to policy wording and these are addressed in the updated appraisal of likely effects described in this chapter.
- 9.3 A summary of the scores for these Policies is given in **Table 9.1** overleaf.

Implications of Proposed Further Changes to Section 6

- 9.4 The SA considered each of the proposed further changes to Section/Chapter 6 (Achieving a Thriving Community) of the Publication Draft Local Plan, in order to determine whether any of these changes would have implications for the SA findings. This is presented in **Appendix 5**. Changes were all to the supporting text and are 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.

Table 6 Summary score for Local Plan Policies – Chapter 6: Achieving a Thriving Community

SA Topics	SA Objectives	HC-S1	HC-DX	HC-S2	HC-S3	HC-S4	HC-D1	HC-D2	HC-D3	HC-D4	HC-D5	HC-D7	HC-D8	HC-D9	HC-D10	HC-D11	HC-D12	HC-D13	HC-D14	HC-D15	HC-D16	HC-D17	HC-S5	HC-S6	HC-D18	HC-D19	HC-D20	HC-S7
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.	0	0	0	0	0	0	0	0	+	-	+	+	+	+	+	0	+	0	0	0	0	0	+	0	+	0	+
Biodiversity and green infrastructure	2) To conserve and enhance biodiversity and to protect, conserve and enhance all habitats and species.	+	+	0	0	0	0	0	+	+	0	+	0	+	0	+	+	+	0	+	0	0	0	+	0	0	+	+
Climate change and adaptation to flood risk	3) To minimise and manage the risk of all forms of flooding.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	+	0	0	0	+
	4) To minimise the impacts of climate change on Exmoor's communities and habitats.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	+	0	0	0	+
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.	0	0	0	0	0	+	+	+	+	-	+	+	+	+	+	0	0	+	0	0	0	0	+	0	+	0	+
Community wellbeing	6) To promote and support thriving and inclusive	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+

SA Topics	SA Objectives	HC-S1	HC-DX	HC-S2	HC-S3	HC-S4	HC-D1	HC-D2	HC-D3	HC-D4	HC-D5	HC-D7	HC-D8	HC-D9	HC-D10	HC-D11	HC-D12	HC-D13	HC-D14	HC-D15	HC-D16	HC-D17	HC-S5	HC-S6	HC-D18	HC-D19	HC-D20	HC-S7
	communities, health and wellbeing.																											
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.	+	0	0	+	+/-	+	+	0	0	0	+	+	+	+	+	+	+	0	0	0	0	+	+	+	+	+/-	+
Historic environment	8) To maintain and enhance the quality of the built environment.	+	+	0	0	0	+	0	0	0	0	+	0	0	0	0	0	+	+	0	0	+	0	+	+	0	+	+
Housing	9) To help ensure that National Park communities have access to appropriate, good quality, sustainable, affordable housing.	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	-	+
Land	10) To promote sustainable forms of development and sustainable use of natural resources.	+	+	0	0	+/-	+/-	+/-	+	+	0	+	+	+	0	0	+	+	0	+	+	+	+	+	+	0	+	+
	11) To reduce all forms of waste production and promote reuse and recycling and minimise the risk of contaminated	+	+	0	0	+/-	+/-	+/-	+	+	0	+	+	+	0	0	+	+	0	+	+	+	+	+	+	0	+	+

SA Topics	SA Objectives	HC-S1	HC-DX	HC-S2	HC-S3	HC-S4	HC-D1	HC-D2	HC-D3	HC-D4	HC-D5	HC-D7	HC-D8	HC-D9	HC-D10	HC-D11	HC-D12	HC-D13	HC-D14	HC-D15	HC-D16	HC-D17	HC-S5	HC-S6	HC-D18	HC-D19	HC-D20	HC-S7	
	land.																												
Landscape	12) To protect, maintain and enhance the special qualities of the Exmoor National Park's landscape character.	+	+	0	0	+	+	+	+ /-	+	+	+	+	+	+	+	+	+	0	+	+	+	+	+	+	+	+	+	+
Coast	13) To protect and/or enhance coastal areas.	0	0	0	0	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
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.	0	0	0	0	+	+	+	+ /-	+	-	+	+	+	+	+	0	+	0	+	0	0	0	+	0	0	+	0	+

Overall Assessment of Chapter 6: Achieving a Thriving Community

- 9.5 Overall, it can be seen that the policies are mainly positive or neutral in relation to the sustainability objectives. This suite of policies set out the policy approach to the provision of housing in the National Park. The housing policies 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.
- 9.6 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.
- 9.7 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 identified in the Landscape Sensitivity Study¹⁴. 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.
- 9.8 Given the limited number of suitable greenfield housing sites, the policy approach is not to allocate sites or set targets for housing. Provision has not been made for housing solely to meet open market demand. Instead the focus is on allowing local needs affordable housing, either through new build or conversions, with a limited element of market housing (with a principal residence tie) where this is needed to cross-subsidise local needs affordable housing. As the approach is needs-led there are unlikely to be significant numbers of new housing (either new build or conversions). As a consequence, the impact of housing development will need to be assessed on a site by site basis, although the Sustainability Appraisal has been able to give an overall assessment of the policy approach. These policies and their assessment need to be read in conjunction with policy GP3 Spatial Strategy set out in Chapter 3 of the Publication Draft Local Plan.
- 9.9 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

¹⁴ Landscape Sensitivity Study (2013) Paul Bryan for Exmoor National Park Authority

mixed effects 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.

- 9.10 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**.
- 9.11 The following sections set out the SA assessments for each policy in more detail.

HC-S1: Housing

- 9.12 HC-S1 sets out the National Park Authority's overall approach to housing development, explaining that an exceptions approach is being taken and that provision will not be made for housing solely to meet market demand. No housing land is being allocated in the Local Plan.
- 9.13 The policy is strongly positive in relation to **Housing** as it specifically aims to meet local housing need, in particular the need for affordable housing. For that reason, it is also strongly positive for **Community and Wellbeing** as it prioritises meeting local housing needs for older people and vulnerable communities. Providing affordable housing will help communities to remain viable and vital.
- 9.14 The policy is positive for **Economy and Employment** as it makes reference to the provision of housing in exceptional circumstances for rural workers.
- 9.15 Because the Local Plan is not allocating sites for housing development, restricting housing development to exceptions housing only, HC-S1 is positive for **Biodiversity and Green Infrastructure, Historic Environment, Land** and **Landscape** as there are less likely to be impacts resulting from new development. The landscape sensitivity study showed that there were limited numbers of dwellings that could be accommodated without detriment to the National Park's landscape.
- 9.16 A neutral score was given in relation to the remaining SA topics.

HC-DX: Vacant Buildings in Settlements

- 9.17 Policy HC-DX sets out the criteria which will apply before the change of use or redevelopment of vacant buildings within the National Park is permitted.
- 9.18 The policy is positive in relation to **Housing** as it sets out that that a sum towards local affordable housing in the National Park will be sought where a vacant site is used for market housing. For that reason, it is also positive for **Community and Wellbeing** in terms of helping to contribute to affordable housing need.
- 9.19 The use of vacant buildings for housing development is positive for **Biodiversity and Land**. In this way, there are less likely to be impacts on biodiversity resulting from new development of existing sites compared with undeveloped sites. The reuse of previously developed sites also represents a more efficient use of land, and this also has benefits for reducing waste generation through the use of existing materials.

- 9.20 Policy HC-DX requires that proposals for the change of use of vacant buildings to market housing do not adversely impact on the character and visual amenity of the area and so a positive effect is likely in relation to **Landscape**. It also states that redevelopment of existing vacant buildings will only be permitted where the building is not listed or considered to be of architectural importance prior to redevelopment, and so a positive effect is also expected for **Historic Environment**.

HC-S2: A Balanced Local Housing Stock

- 9.21 Policy HC-S2 sets out the approach that will be taken to ensuring that there is a balanced stock of housing in the National Park.
- 9.22 The aim of this policy is to ensure that residential development contributes to the creation of sustainable, balanced and inclusive communities; therefore HC-S2 is strongly positive for the SA topics of **Community and Wellbeing** and **Housing**. The policy aims for housing development to meet the particular needs of local communities and ensure that it is of a good standard. An appropriate mix of housing types, sizes and tenure will be provided. The policy also requires that a proportion of new housing is constructed in accordance with Building Regulations standard M4(2) to ensure they are adaptable and accessible, and in particular circumstances, in accordance with M4(3) standards, to accommodate wheelchair users.
- 9.23 The specific nature of the policy means that a neutral score was given in relation to the remaining SA topics.

HC-S3: Local Occupancy Criteria For Affordable Housing

- 9.24 Policy HC-S3 sets out the criteria for determining local occupancy for the affordable housing provided in Exmoor National Park.
- 9.25 The policy is strongly positive for the SA topics of **Community Wellbeing** and **Housing** as it will ensure that local people have access to affordable housing and will help younger people in particular to continue living in Exmoor. This will ensure that rural communities remain vibrant and vital, with younger people not being priced out of the housing market. The policy also allows for those who carry out paid work of value to the National Park to qualify for local affordable housing. Affordable housing provision for these groups will ensure that the workforce within the National Park is retained which will help to sustain economic growth and maintain the viability of services and facilities, and so a positive effect is given for **Economy and Employment**.
- 9.26 The specific nature of the policy means that a neutral score was given in relation to the remaining SA topics.

HC-S4: Principal Residence Housing

- 9.27 The policy approach to housing is to focus on affordable housing provision. Market housing is permitted only to enable the delivery of affordable housing or through the change of use of non-residential buildings in settlements and sub-divisions of existing dwellings. However, where market housing is required to enable the delivery of affordable housing, it will be controlled by a mechanism which ensures it can be lived in by anyone but only as their principal residence and prevent it being occupied as a second/holiday home.

- 9.28 HC-S4 scored strongly positive for the SA themes of **Community and Wellbeing** and **Housing** as it is aimed at supporting vibrant communities and delivery of local affordable housing by preventing new housing from becoming second homes. Local services are likely to be supported as people will live in homes throughout the year rather than just during holiday periods.
- 9.29 The policy will also be positive for **Landscape**, as it does not allow open market housing to meet demand, which will help to protect landscape character. This will also enable co-location of housing close to services and employment, supporting sustainable **Transport** through helping to reduce the need to travel.
- 9.30 A mixed score was given in relation to the **Economy and Employment**. The policy supports local communities and hence indirectly supports the local economy, particularly through people living in homes and using services throughout the year. However, open market housing is not permitted, which could limit some economic development e.g. construction and supply businesses, but equally it will support the tourism sector through maintaining the high quality natural and built environment.
- 9.31 There may be both positive and negative implications in relation to **Land**. The policy is positive in not allowing open market housing to meet demand, which would require considerable land take. However, where market housing is required to cross-subsidise the delivery of affordable housing, this will require additional land take.

HC-D1: Conversions to Dwellings in Settlements

- 9.32 This policy sets out the criteria for new housing in settlements through conversions. The focus is on providing affordable housing to meet local needs, but an element of cross-subsidy through market housing will be considered where it can be shown that there are no other means of funding the scheme.
- 9.33 The policy was considered to be strongly positive in relation to **Housing** as it specifically aims to help ensure that local communities have access to appropriate, good quality, sustainable, affordable housing. It provides flexibility for conversion to housing within a wider range of settlements and aims to ensure that housing makes good use of existing land and buildings, which will also make use of embodied energy.
- 9.34 The policy is positive in relation to **Community and Wellbeing** as it would help to maintain thriving and inclusive communities through the provision of local affordable housing within settlements through conversion (although the policy could also relate to principal residence housing in accordance with clause 4 of policy HC-S1) . The policy also promotes development of accessible and adaptable housing, which is expected to help those with specialist housing needs live more independently, in their own home. The focus is on providing for local needs rather than open market demand which will also help to reduce new housing becoming second homes. The policy will also support the **Economy and Employment**, as the location of housing in existing settlements will help to provide accommodation for local workers, supporting local businesses. Additional housing could also help to maintain the viability of services and facilities.
- 9.35 HC-D1 specifies that where conversions are proposed, the building must be well related to existing buildings and the proposal must conserve or enhance the character of the settlement. Therefore, the policy is positive for the theme of **Landscape**. It is also positive for **Historic Environment** as it ensures that the

character of buildings is conserved and cross refers to policy CE-S5: Principles for the Conversion or Structural Alteration of Existing Buildings.

- 9.36 There are likely to be mixed or uncertain implications in relation to the SA topic of **Land**. The policy approach is not to allocate sites for housing but to rely on rural exceptions sites being brought forward which provides less certainty over the use of land, and is likely to involve some land-take. However, the overall levels of housing are likely to be low, and the evidence gathered to inform the settlement strategy has demonstrated that housing can be accommodated within these settlements either through conversion of existing buildings, reuse of brownfield land, or limited greenfield development.
- 9.37 The policy requires conversions to be located in existing settlements so will be positive in relation to the SA topics of **Climate Change Mitigation and Energy** and **Transport** as this should minimise the need to travel and emissions through co-locating housing, employment and services. Levels of traffic and congestion are problematic in some settlements at certain times of the year but this is primarily due to seasonal effects of tourism, and low level of additional housing is not likely to impact on overall traffic levels.
- 9.38 A positive score was also given in relation to the SA topic of the **Coast**. The policy addresses the provision of housing in the settlements identified in the spatial strategy - this includes the coastal settlements of Lynmouth and Porlock Weir, which are identified as locations where conversions to dwellings will be acceptable in principle. Because the plan is not allocating sites, and will rely on exception sites coming forward, each one will have to be judged on its own merits and in accordance with flood risk.
- 9.39 A neutral score was given in relation to the SA topics of **Biodiversity and Green Infrastructure** and **Climate Change and Adaptation to Flood Risk**. The policy approach in the Local Plan is to rely on exception sites coming forward rather than allocating sites, consequently each proposal will have to be judged on its own merits and against the other policies in the Plan. However, overall levels of housing are likely to be low so should not adversely affect biodiversity. The spatial strategy set out in GP3 has identified settlements where housing will be allowed. An initial appraisal of flood risk and wildlife has been undertaken for each of these settlements, and consideration of flood risk assessment would need to be included in any proposals being brought forward.
- 9.40 A neutral score was also given in relation to **Air Quality and Water Resources**. The location of new housing will be within existing settlements, which may exacerbate air quality issues in some of the Local Service Centres through additional emissions from domestic properties. However, overall levels of housing likely to be low and so should not adversely affect air quality and water resources. The SA Scoping report concluded that levels of development should not exceed any health or air quality standards.

HC-D2: New Build Dwellings in Settlements

- 9.41 This policy sets out the criteria for new housing in settlements through new builds.
- 9.42 The policy is strongly positive in relation to **Housing** as it aims to help ensure that local communities have access to appropriate, good quality, sustainable, affordable housing. The policy is also positive in relation to **Community and Wellbeing** as it

is intended to help to maintain thriving and inclusive communities through provision of local affordable housing within settlements through new builds.

- 9.43 As with policy HC-D1, the policy will also support the **Economy and Employment**, as the location of housing in existing settlements will help to provide accommodation for local workers, supporting local businesses. Additional housing could also help to maintain the viability of services and facilities.
- 9.44 HC-D2 requires the site for a new build to be well related to existing buildings and for the development to conserve or enhance local character. Therefore, the policy is positive for **Landscape**.
- 9.45 The policy approach in the Local Plan is to rely on exception sites coming forward to address local affordable housing needs, rather than allocating sites for housing, and so each proposal will have to be judged on its own merits, although overall levels of housing are likely to be low within the National Park and so impacts are likely to be neutral on the **Historic Environment**. The evidence gathered in the landscape sensitivity study to inform the settlement strategy has demonstrated that some new build housing can be accommodated within these settlements without damage to landscape character.
- 9.46 There are likely to be mixed or uncertain implications in relation to the SA topic of **Land**. The policy approach is not to allocate sites for housing but to rely on rural exceptions sites being brought forward which provides less certainty over the use of land, and is likely to involve some land-take. However, the overall levels of housing are likely to be low, and the evidence gathered to inform the settlement strategy has demonstrated that housing can be accommodated within these settlements either through conversion of existing buildings, reuse of brownfield land, or limited greenfield development.
- 9.47 The policy requires conversions to be located in existing settlements so will be positive in relation to the SA topics of **Climate Change Mitigation and Energy** and **Transport** as this should minimise the need to travel and emissions through co-locating housing, employment and services.
- 9.48 A positive score was also given in relation to the SA topic of the **Coast**. The policy addresses the provision of housing in the settlements identified in the spatial strategy - this includes the coastal settlements of Lynmouth and Porlock Weir, which are identified as locations where new build housing will be acceptable in principle (only 100% affordable in Porlock Weir. Because the plan is not allocating sites, and will rely on exception sites coming forward, each one will have to be judged on its own merits and in accordance with flood risk.
- 9.49 A neutral score was given in relation to the SA topics of **Biodiversity and Green Infrastructure** and **Climate Change and Adaptation to Flood Risk**. The policy approach in the Local Plan is to rely on exception sites coming forward rather than allocating sites, consequently each proposal will have to be judged on its own merits and against the other policies in the Plan. However, overall levels of housing are likely to be low so should not adversely affect biodiversity. The spatial strategy set out in GP3 has identified settlements where housing will be allowed. An initial appraisal of flood risk and wildlife has been undertaken for each of these settlements, and consideration of flood risk assessment would need to be included in any proposals being brought forward.
- 9.50 A neutral score was also given in relation to **Air Quality and Water Resources**. The location of new housing will be within existing settlements, which may

exacerbate air quality issues in some of the Local Service Centres through additional emissions from domestic properties. However, overall levels of housing are likely to be low and so should not adversely affect air quality and water resources.

HC-D3: Accessible and Adaptable Housing for Exmoor's Communities

- 9.51 Policy HC-D3 makes provision for adaptable and accessible housing for older people and other vulnerable members of the National Park's communities. The proportion of older people living on Exmoor is significantly higher than the national average and 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 policy allows for conversion of existing buildings or provision of adaptable and accessible housing to cross subsidise the delivery of local need affordable housing as part of a wider housing scheme.
- 9.52 The policy was considered to be strongly positive for the SA topics of **Housing** and **Community Wellbeing**. The policy is aimed at supporting thriving and inclusive communities, and is specifically designed to address the housing needs of local vulnerable members of the community. Evidence shows that the housing needs are for smaller units with affordable rents, particularly for younger people and families and an ageing population. The location of housing in existing settlements will support the maintenance of those communities including the continuation of services.
- 9.53 The policy is also positive for **Biodiversity and Green Infrastructure**, as the conversion of buildings would need to take account of potential species in accordance with CE-S5 Principles for the Conversion or Structural Alteration of Existing Buildings.
- 9.54 There are both positive and negative implications in relation to **Climate Change Mitigation and Energy**. The policy aims to ensure that housing makes good use of existing land and buildings, which will also make use of embodied energy. However, the provision of additional dwellings will also add to greenhouse gas emissions.
- 9.55 There are also mixed implications in relation to **Land and Landscape**. The policy provides for specialist housing through conversions which would make efficient use of land. Accessible and adaptable housing could also be provided as part of a larger greenfield development which would require land take, although the size is restricted to 93m² to minimise land take and in recognition of the limited capacity for new build within the National Park due to landscape sensitivity. However, adaptable and accessible housing may require more units to be provided to cross-subsidise the affordable housing, resulting in more land take, although safeguards are in place through Policy CE-S1 Landscape and GP1 National Park Purposes & Sustainable Development. Furthermore, the accessible and adaptable housing with a local tie may only provide an element of the cross-subsidy as part of a wider housing scheme.
- 9.56 There are also mixed implications in relation to **Transport**. Proposals for accessible and adaptable housing are required to be integrated into the local community to enable access to required services and facilities, although additional requirements for access and parking could be required for example in relation to disabled parking.

Conversely, an additional dwelling could also increase travel movements from the occupants, or from care workers if an elderly/dependant relative.

9.57 The policy is neutral in relation to the remaining SA themes.

HC-D4: 'Extended Family' Dwellings Criteria

9.58 Policy HC-D4 sets out criteria to assess proposals for the re-use of an existing traditional building as a dwelling for 'extended family', defined as a direct descendent or antecedent. Such dwellings would only be allowed through conversion of existing traditional buildings within the curtilage of a dwelling in a settlement, or where there is an existing dwelling in a farmstead, and not in isolated locations.

9.59 The policy is strongly positive for the SA topics of **Housing** and **Community Wellbeing** as it seeks to meet the particular housing needs of local communities. The policy relates to housing for extended family members, which will help to retain vibrant communities with a range of age groups.

9.60 There are also positive implications in relation to **Land** and **Landscape**. The policy provides for extended family housing through conversions which would make efficient use of land. It specifies that extended family dwellings will only be permitted where this would involve the change of use of an existing building and in close association with an existing dwelling – this should minimise landscape impacts and land take that could be associated with new development.

9.61 The policy is also positive for **Biodiversity and Green Infrastructure**, as the policy requires extended family housing to be provided through conversions which will reduce the potential for impacts on biodiversity. The conversion of buildings would need to take account of potential species in accordance with CE-S5 Principles for the Conversion or Structural Alteration of Existing Buildings.

9.62 There are both positive and negative implications in relation to **Climate Change Mitigation and Energy**. The policy aims to ensure that housing makes good use of existing land and buildings, which will also make use of embodied energy. However, the provision of additional dwellings will also add to greenhouse gas emissions.

9.63 The policy is positive in relation to **Transport** as the development of extended family housing could enable an extended family member to work on the family farm or business, thus reducing the need to travel, and may help to reduce the need for journeys undertaken to care for an older or dependent relative. The policy is also positive for **Air Quality and Water Resources** for that reason.

9.64 The policy was neutral in relation to the **Historic Environment, Coast, Economy and Employment**, and **Climate Change and Adaptation to Flood Risk**.

HC-D5: Custom/Self Build Local Need Housing in Rural Communities

9.65 Policy HC-D5 sets out criteria for permitting custom/self build housing in rural communities.

9.66 The policy is positive for the SA themes of **Housing** and **Community and Wellbeing** as it provides for the development of new build housing to meet specific local needs in rural communities, and requires any such housing to be affordable for local people and to remain so in perpetuity.

- 9.67 The policy is also positive for the theme of **Landscape** as it requires new build dwellings to be well-related to existing buildings, to be proportionate in scale and to conserve or enhance landscape character.
- 9.68 The policy could be negative in relation to **Transport, Air Quality and Water Resources** and **Climate Change Mitigation and Energy** as it could result in new development taking place in rural communities where people are more likely to use cars for most journeys and may need to travel longer distances to access jobs, services and facilities. However, the number of new affordable homes within rural communities is likely to be low and therefore any such negative impacts are likely to be minimal.
- 9.69 The policy was neutral in relation to the remaining SA themes.

HC-D6: The Change of Use of Serviced Accommodation to Housing

- 9.70 Policy HC-D6 set out criteria for permitting the change of use of serviced accommodation to housing. Note that Policy HC-D6 has been deleted through the Proposed Main Modifications. The change of use of serviced accommodation to dwellings will be considered against policy RT-D3 Safeguarding Serviced Accommodation.

HC-D7: Conversions to Dwellings in the Open Countryside

- 9.71 Policy HC-D7 allows conversions to dwellings in the open countryside where there is a proven need for housing to meet local needs, extended family requirements, or essential need for a rural worker providing the need cannot be met within the existing housing stock and the building is located within a hamlet or farmstead.
- 9.72 The policy is positive for the SA topics of **Housing, Community and Wellbeing**, and **Economy and Employment** as it will help provide accommodation for succession farming, extended families, and rural workers and thereby contribute to community wellbeing. It will also contribute to the local economy and employment by enabling people to live close to their place of work.
- 9.73 A positive score was also given for the SA topics of **Land** and **Landscape** due to the criteria included in the policy to ensure that converted buildings are closely associated with existing dwellings or other buildings. This should help to mitigate the potential landscape impacts of development in the open countryside.
- 9.74 The policy is positive for the topics of **Biodiversity and Green Infrastructure** and the **Historic Environment** as permitting the conversion of existing buildings in certain circumstances will help to avoid the need for new buildings to be constructed, which may be more likely to impact on biodiversity and heritage features.
- 9.75 The policy is also considered to be positive in relation to **Climate Change Mitigation and Energy** as it provides for the reuse of existing buildings which will make use of embodied energy. In addition, the provision of accommodation for rural workers through conversions will reduce the need to travel for work; therefore the policy is also positive for **Transport** and **Air Quality and Water Resources**.
- 9.76 The remaining SA topics (**Coast** and **Climate Change and Flood Risk**) were given a neutral score.

HC-D8: New Build Dwellings in the Open Countryside

- 9.77 Policy HC-D8 sets out criteria for new build dwellings in the open countryside, including a requirement that there is a proven need for a rural worker that cannot be met within the existing housing stock, and that the dwelling must be well-related to existing buildings.
- 9.78 The policy was considered to be positive for the SA topics of **Housing, Community and Wellbeing**, and **Economy and Employment** as it will help to provide accommodation for succession farming and rural workers and thereby contribute to community wellbeing. It will also contribute to the local economy and employment by enabling people to live close to their place of work and supporting land-based industries.
- 9.79 A positive score was also given for the SA topics of **Land** and **Landscape** due to the criteria in the policy which seek to avoid inappropriate new dwellings which could otherwise harm the landscape character and might be more likely to be located on greenfield sites.
- 9.80 The policy will help to provide accommodation for rural workers and family, reducing the need to travel to work; therefore it is positive in relation to **Transport, Climate Change Mitigation and Energy**, and **Air Quality and Water Resources**.
- 9.81 The policy is neutral in relation to **Biodiversity and Green Infrastructure**, the **Historic Environment**, **Climate Change Mitigation and Energy**.
- 9.82 The remaining SA topics were given a neutral score.

HC-D9: Rural Workers

- 9.83 Policy HC-D9 sets out criteria for the provision of housing for rural workers.
- 9.84 The policy is positive for the SA topics of **Economy and Employment** as it sets a framework for the provision of housing to meet the needs of rural workers, and so will help to support rural industry. It is also positive for **Housing** and **Community and Wellbeing** as it will help to meet specific housing needs.
- 9.85 Providing housing for rural workers will help to reduce the need to travel, thereby having positive impacts on **Transport, Air Quality and Water Resources** and **Climate Change Mitigation and Energy**.
- 9.86 The policy indirectly supports land management activities that benefit the landscape and biodiversity as it requires the related rural or land based enterprise to contribute to the natural beauty and wildlife of the National Park. The policy is therefore positive for **Biodiversity and Green Infrastructure**, **Land** and **Landscape**.
- 9.87 The remaining SA topics were given a neutral score.

HC-D10: Succession Farming – Second Dwellings on Established Farms

- 9.88 Policy HC-D10 provides a framework for the provision of second dwellings on established farms.
- 9.89 The policy is positive for the SA topics of **Housing, Community and Wellbeing** and **Economy and Employment** as it will provide homes where farm businesses are being passed on to younger workers. This will help to provide the necessary accommodation but will also benefit the viability of farm businesses and make sure that they can be maintained in the longer term, which will in turn have knock on benefits for the vitality of rural communities.

- 9.90 The criteria included in the policy will help to avoid adverse impacts on the **Landscape** through inappropriate development on farms, particularly as the proposal must meet the requirements of other policies in relation to design and layout.
- 9.91 Providing on-site accommodation for farm workers who will be taking over the farm business will help to reduce the need to travel, thereby having positive impacts on **Transport, Air Quality and Water Resources** and **Climate Change Mitigation and Energy**.
- 9.92 The remaining SA topics were given a neutral score.

HC-D11: Residential Caravans

- 9.93 Policy HC-D11 sets out criteria for the use of temporary caravans as housing for rural workers.
- 9.94 The policy is positive for the SA topics of **Housing, Community and Wellbeing**, and **Economy and Employment** as it sets out a framework for providing accommodation for rural workers.
- 9.95 The policy requires the residential caravan to be able to be accommodated without adverse impacts on landscape character, visual amenity, and sensitive habitats and species; therefore it is positive in relation to **Landscape** and **Biodiversity and Green Infrastructure**.
- 9.96 Where the policy enables temporary accommodation to be provided for rural workers this will help to reduce the need to travel, thereby having positive impacts on **Transport, Air Quality and Water Resources** and **Climate Change Mitigation and Energy**.
- 9.97 The policy is positive in relation to **Climate Change and Adaptation to Flood Risk** as it requires residential caravans to be located outside of areas of flood risk.
- 9.98 The remaining SA topics were given a neutral score.

HC-D12: Replacement of Rural Workers Occupancy Conditions

- 9.99 Policy HC-D12 allows existing agricultural occupancy conditions to be replaced in circumstances where particular criteria are met.
- 9.100 The policy is strongly positive for **Housing** as it provides for flexibility where a residential property is no longer required for an agricultural worker, and would impose a replacement condition that the property is used for local affordable housing. For this reason, the policy is also positive for **Community and Wellbeing**. The policy is positive for **Economy and Employment** as, where a local person cannot be found to occupy the dwelling, it can be used for temporary holiday accommodation which will help to support the local tourism economy and bring about the associated spending.
- 9.101 A positive score was also given for the SA topics of **Land, Landscape** and **Biodiversity and Green Infrastructure** as providing for flexibility in terms of rural workers occupancy conditions could help to avoid the need for new housing to be developed to meet local affordable housing need.
- 9.102 The remaining SA topics were given a neutral score.

HC-D13: Replacement of Holiday Occupancy Conditions and Extended Family Ties

- 9.103 Policy HC-D11 enables flexibility for holiday lets or existing extended family dwellings to change occupancy to either type of occupancy or to a local need affordable home, subject to certain criteria.
- 9.104 The policy scores strongly positive in relation to **Community and Wellbeing** and **Housing**. As it provides a framework for holiday accommodation to be permitted for residential use to meet local affordable housing needs.
- 9.105 The policy also scored positively for the **Historic Environment** as using holiday accommodation for local affordable housing would help to reduce the need for new development and therefore indirectly protect the historic environment and settlement character.
- 9.106 The policy is positive in relation to **Air Quality and Water Resources** and **Transport** as using holiday accommodation to meet local affordable housing need would enable more people to live close to their workplace, thus reducing the need to travel.
- 9.107 The policy is also positive in relation to **Biodiversity and Green Infrastructure, Landscape**, and **Land** as providing a framework for holiday accommodation to be used to meet local affordable housing need will limit the number of new houses so will place fewer pressures on these assets. The reuse of existing buildings which will also reduce demand for greenfield sites. The landscape sensitivity study showed that there were limited numbers of dwellings that could be accommodated without detriment to the National Park's landscape.
- 9.108 The policy has both positive and negative impacts on **Economy and Employment**. It is positive in providing a solution to local affordable demand; however using holiday accommodation for permanent housing could reduce the stock of holiday accommodation and potentially reduce the number of tourists in Exmoor and the associated spending.
- 9.109 A neutral score was given in relation to SA topics relating to **Climate Change Mitigation and Energy, Coast** and **Climate Change and Flood Risk**.

HC-D14: Subdivisions of Existing Dwellings

- 9.110 Policy HC-D14 relates to the subdivision of existing dwellings, and requires dwellings which are currently local affordable housing to remain as local affordable housing. If the dwelling has an agricultural occupancy tie it would have to remain so and demonstrate that there was a need for additional accommodation for rural workers, or it could become a local affordable dwelling. A principal residency condition will also be applied to any dwellings created under this policy.
- 9.111 This policy was considered to be positive in relation to the SA topics of **Community and Wellbeing** and **Housing**, as it provides flexibility for changes to existing dwellings. The measures in the policy requiring local affordable housing to remain as that, even once subdivided, and requiring subdivided homes to be used as principal residences, will help to ensure that communities remain viable.
- 9.112 A positive score was given in relation to the **Historic Environment**, as the policy requires that the subdivision of existing buildings does not adversely affect buildings of historic and/or architectural interest.

9.113 The policy was considered to be positive in relation to **Climate Change Mitigation and Energy** as the subdivision of existing buildings would make good use of embodied energy.

9.114 The policy is neutral for the SA themes of **Land, Transport, Landscape, Biodiversity and Green Infrastructure, Climate Change and Adaptation to Flood Risk, Coast and Air Quality and Water Resources and Economy and Employment.**

HC-D15: Residential Extensions

9.115 Policy HC-D15 relates to residential extensions and permits existing buildings to be extended by 35% of the original floorspace, provided that they meet certain criteria.

9.116 The policy was considered to be positive in relation to the SA topics of **Community and Wellbeing** and **Housing** as it provides flexibility for making changes to existing dwellings in order to increase the living space and utility of dwellings through extensions. The policy also includes a criterion to ensure that extensions do not have adverse effects on amenity.

9.117 The policy is also positive for **Land** and **Landscape** as it restricts the scale of extensions, which will minimise land-take and any impacts on landscape. The policy is also positive for **Transport** as it requires extensions not to adversely impact on parking provision.

9.118 The policy is positive in relation to **Biodiversity and Green Infrastructure** as it requires proposals for extensions to ensure the maintenance or replacement of any bat and barn owl roosts that may be present. The policy also requires that proposals for extensions must demonstrate that they will not adversely affect biodiversity.

9.119 The policy is neutral in relation to the **Historic Environment, Climate Change Mitigation and Energy, Climate Change and Adaptation to Flood Risk, Coast, Air Quality and Water Resources and Economy and Employment.**

HC-D16: Outbuildings

9.120 Policy HC-D16 allows new buildings or conversions of existing buildings for ancillary purposes such as garages, sheds, or workshops although the outbuilding must be proportionate to the size of the dwelling.

9.121 This policy is positive in relation to the SA topics of **Community and Wellbeing** and **Housing**, as it provides a framework for increasing the living space and utility of existing dwellings through outbuildings. A criterion is included in the policy which requires adverse impacts on the amenity of neighbours to be avoided. The policy is also positive for **Land** and **Landscape** as it relates to additional buildings within the existing curtilage, which will minimise land-take and any impacts on the landscape.

9.122 The policy is neutral for the themes of **Historic Environment, Climate Change Mitigation and Energy, Transport, Biodiversity and Green Infrastructure, Climate Change and Adaptation to Flood Risk, Coast, Air Quality and Water Resources and Economy and Employment.**

HC-D17: Replacement Dwellings

9.123 Policy HC-D17 relates to the replacement of existing dwellings. The replacement should be close to the existing footprint and not bigger than the original building.

The policy excludes the replacement of dwellings that are listed or of historic importance worthy of conservation.

- 9.124 This policy is positive in relation to the SA topics of **Community and Wellbeing** and **Housing**, as it provides for the replacement of existing dwellings, which may be in disrepair or failing to meet needs. This could also avoid adverse impacts on the character and amenity of the area, benefiting the **Landscape**. Replacement buildings must be sited on the same footprint unless moving the building would result in landscape benefits; therefore the policy is also positive for **Land**.
- 9.125 A positive score was given in relation to the **Historic Environment**, as policy HC-D15 does not allow replacement dwellings where the existing dwelling is listed or of historic importance worthy of conservation, to ensure buildings of interest are retained. It also includes a clause to require replacement close to the original footprint of the dwelling unless cultural heritage benefits justify moving it.
- 9.126 The policy was neutral in relation to **Climate Change Mitigation and Energy, Biodiversity and Green Infrastructure, Climate Change and Adaptation to Flood Risk, Coast, Air Quality and Water Resources** and **Economy and Employment**.

HC-S5: Travelling Communities

- 9.127 Policy HC-S5 Travelling Communities allows for small sites to be identified on an exceptions basis where there is proven need (and this cannot be provided outside the National Park boundary), as well as other criteria. There is no outstanding need that has been identified for Exmoor in the latest Gypsy and Traveller Accommodation Assessment.
- 9.128 The policy was considered to be positive in relation to the SA topics of **Housing** and **Community and Wellbeing** as it seeks to provide for the accommodation needs of Traveller communities. Where sites are required these should be located in or close to a settlement and be accessible to appropriate health and educational facilities. The policy also requires the interests of the settled community to be respected. There are also benefits in relation to the **Economy and Employment** as providing for the needs of travelling communities should avoid the problems associated with unauthorised encampments which can have a negative impact on the local character and amenity of an area with potential knock-on impacts on local businesses, particularly tourism. In seeking to provide for the needs of Traveller communities in a planned way, this should ensure that any sites identified are appropriately located and do not impact on local character or amenity.
- 9.129 A positive score was also given for **Land** and **Landscape**. Whilst no specific allocation of sites is given, meaning there are no specific impacts on landscape to consider, the policy approach is to protect the National Park through seeking to provide for the needs outside the National Park, and any sites that are identified within the National Park should be accommodated without harm to the National Park. The policy requires any sites to be located in or adjoining settlements which could include consideration of brownfield sites, and to conserve or enhance settlement character and pattern; to be met without an adverse impact on the landscape and application to be accompanied by a landscaping scheme. By seeking to provide for the needs of Traveller communities in a planned way, the policy should help to avoid the problems associated with unauthorised encampments which can have a negative impact on land including increased litter and waste.

- 9.130 A neutral score was given in relation to **Biodiversity and Green Infrastructure**. No specific allocation of sites is given, so there are no specific impacts on biodiversity or green infrastructure to consider. The policy approach is to protect the National Park through seeking to provide for the needs outside the National Park, and for any sites that are identified within the National Park should be accommodated without harm to the National Park. Similarly in relation to the **Historic Environment**, the policy requires any sites to conserve or enhance settlement character and pattern. Overall the policy approach is to prevent harm to the National Park.
- 9.131 No specific implications were identified in relation to **Transport**. Where sites are required these should be located in or close to a settlement and be accessible to appropriate health and educational facilities, which should reduce the need to travel.
- 9.132 No implications were identified for the SA topics of the **Coast** or **Climate Change Mitigation and Energy**.
- 9.133 A neutral score was given in relation to **Climate Change and Adaptation to Flood Risk** and **Air Quality and Water Resources**. If circumstances arise where a site is required to address a proven local need, then identification of sites would need to consider any issues of flood risk given the vulnerability of the use as caravan or mobile home sites intended for permanent occupation are regarded to be at higher risk (classified as 'highly vulnerable')¹⁵. Site selection would also need to include provision of suitable water and sewerage infrastructure to ensure there are no adverse impacts on water resources or air quality. However, these issues are addressed in the supporting text to the policy.

HC-S6: Local Commercial Services and Community Facilities

- 9.134 Policy HC-S6 supports the provision of new or extended community facilities and local commercial services including pubs, restaurants, and shops.
- 9.135 The policy scored strongly positive for **Communities and Wellbeing** as it is intended to improve the sustainability, resilience and self-sufficiency of the National Park's settlements by supporting the retention and provision of local commercial services and community facilities. This responds to issues raised during an earlier consultation relating to there being insufficient facilities for young people. The policy supports objectives on health and wellbeing by including provision of services such as doctors' surgeries, and also open space which can provide opportunities for active lifestyles, access to tranquil places and so on. Similarly, reference is made to provision of schools including pre-schools which also provide wider community facilities such as sports fields. Some settlements link together in terms of the collective services and facilities they provide and the sharing of local multi-service facilities is encouraged. Health and social welfare issues are a priority in dispersed rural areas such as Exmoor, and the importance of local services for older people, those with disabilities or limiting long term illnesses is recognised.
- 9.136 The policy was also considered to be positive for the **Economy and Employment** as it relates to local commercial services including pubs, restaurants, and shops. There are positive benefits for local employment and also local businesses can provide services and products for the community facilities. The provision of local services will also benefit businesses for example banks, petrol stations, or in providing necessary services for employees.

¹⁵ Technical Guidance to the NPPF, 2012, CLG Table 2 Flood Risk Vulnerability classification

- 9.137 The policy was considered to be positive in relation to **Air Quality and Water Resources** and **Transport**. It aims to retain local service provision, either in specific settlements, or through the linking of settlements in terms of the collective services and facilities they provide, which will reduce the need to travel and therefore reduce emissions (benefiting air quality and climate change mitigation). The supporting text highlights the importance of community services and facilities in dispersed rural areas which reduces the need to travel, and cross-refers to AC-S1 sustainable transport. Some settlements link together in terms of the collective services and facilities they provide. Reference is made to the Exmoor National Park Open Space Strategy which assesses existing open amenity space.
- 9.138 HC-S6 scored positively for **Biodiversity and Green Infrastructure** as there is reference in the supporting text to the Exmoor National Park Open Space Strategy which assesses existing open amenity space including natural and semi natural green spaces. There is also reference to the protection of important visual amenity space identified within and adjoining the settlements. HC-S6 supports improvement of existing facilities where enhancement of the built and natural environment can be achieved.
- 9.139 The policy was considered to be positive in relation to **Climate Change Mitigation and Energy** as it aims to retain local service provision, which will reduce the need to travel and therefore reduce greenhouse gas emissions. The supporting text identifies that some settlements link together in terms of the collective services and facilities they provide, which could also reduce the need to travel to larger centres.
- 9.140 The policy was positive for **Historic Environment** as HC-S6 gives preference to the reuse of traditional buildings, although change of use of non-traditional buildings or a replacement building may be acceptable if enhancement of the built or natural environment can be achieved.
- 9.141 The policy was considered to be positive in relation to **Land**. It supports the efficient use of land by giving preference to the reuse of traditional buildings and allowing change of use of non-traditional buildings or a replacement building may be acceptable if enhancement of the built or natural environment can be achieved. HC-S6 requires new-build developments to be located within the named settlements, or well related to the settlement. The re-use of existing buildings and location of new development in or closely associated to existing settlements, will reduce the need for new development on greenfield sites. The policy supports the provision of community services and facilities including petrol stations, which could be a pollution hazard, although this would be regulated and measures would need to be put in place to reduce risks.
- 9.142 A positive score was given in relation to **Landscape**, as the policy focuses on safeguarding existing facilities and providing shared facilities and multi-purpose facilities, which will all help to protect landscape character. Preference is given to the change of use of traditional buildings which would also help to safeguard these components of landscape character. Where new facilities are required, they should be located within the named settlements, or well related to the settlement.
- 9.143 The policy was considered to be neutral in relation to **Climate Change and Adaptation to Flood Risk**, and **Coast**. The policy was also considered to be neutral in relation to **Housing**, as it is primarily about the provision of services and facilities and does not directly relate to housing provision, although the approach is to support the retention of services and facilities within settlements that are accessible to local communities.

HC-D18: Local Commercial Service Provision

- 9.144 Policy HC-D18 sets out criteria for the provision of new or extended local commercial services.
- 9.145 The policy scored strongly positive for **Communities and Wellbeing** as it is intended to improve the sustainability, resilience and self-sufficiency of the National Park's settlements by supporting appropriate local commercial services.
- 9.146 The policy was were also considered to be strongly positive for the **Economy and Employment** as it relates to local commercial services and supports appropriate retail and other commercial activities which will benefit the local economy.
- 9.147 The nature of the commercial services covered by this policy are such that they are not expected to have notable impacts on reducing the need for local people to travel; therefore the policy is neutral in relation to **Air Quality and Water Resources, Climate Change Mitigation and Energy and Transport**. HC-D18 is also neutral in relation to **Biodiversity and Green Infrastructure, Climate Change and Adaptation to Flood Risk, Housing and Coast**.
- 9.148 The policy was considered to be positive in relation to **Land and Landscape** as it supports the efficient use of land by giving preference to the reuse of buildings. This could also be positive for the **Historic Environment**.

HC-D19: Safeguarding Local Services and Community Facilities

- 9.149 Policy HC-D19 safeguards existing services and facilities.
- 9.150 The policy scored strongly positive for **Communities and Wellbeing** as it is intended to improve the sustainability, resilience and self-sufficiency of the National Park's settlements by supporting the retention of local commercial services and community facilities. HC-D19 aims to prevent existing community services or facilities being lost, or where these are no longer viable, to securing them for an alternative use that benefits the community such as local affordable housing or employment use.
- 9.151 The policy was also considered to be positive for the **Economy and Employment** as it relates to local commercial services including pubs, restaurants, and shops. There are positive benefits for local employment and also local businesses can provide services and products for the community facilities that are retained through this policy. The provision of local services will also benefit businesses for example banks, petrol stations, or in providing necessary services for employees. Existing commercial services are also safeguarded.
- 9.152 The policy was considered to be positive in relation to **Air Quality and Water Resources and Transport**. It aims to retain local service provision, which will reduce the need to travel and therefore reduce emissions (benefiting air quality and climate change mitigation). The supporting text highlights the importance of community services and facilities in dispersed rural areas which reduces the need to travel, and cross-refers to AC-S1 Sustainable Transport.
- 9.153 The policy was considered to be positive in relation to **Climate Change Mitigation and Energy** as it aims to retain local service provision, which will reduce the need to travel and therefore reduce greenhouse gas emissions.
- 9.154 A positive score was given in relation to **Landscape**, as the policy is focused on safeguarding existing facilities which will help to protect landscape character.

9.155 HC-D19 scored neutrally for **Biodiversity and Green Infrastructure, Historic Environment, Land, Climate Change and Adaptation to Flood Risk, Coast and Housing**.

HC-D20: Important Visual Amenity Space

9.156 Policy HC-D20 protects land of visual amenity value within and adjoining settlements. It recognises the significance of these green areas to the setting of buildings and other features, their importance to the overall character of a settlement and to the buildings themselves.

9.157 HC-D20 was considered to be strongly positive for **Landscape**. The policy is intended to protect areas of land that have a landscape value to communities and the settlements they live in. It identifies land of visual amenity value within and adjoining settlements, which recognises the significance of these green areas to the setting and overall character of the settlement and individual buildings. The explanatory text explains how the selection has been undertaken by a professional landscape architect, and provides the criteria by which the selection has been made, including screening, setting, visual connections and experience. The policy reflects the importance of visual amenity space and its relationship with settlement character, the surrounding landscape or the cultural/historic traditions of individual settlements.

9.158 HC-D20 was positive in relation to **Biodiversity and Green Infrastructure**. The explanatory text recognises that amenity space can provide multiple benefits. The main purpose is for visual amenity, although such spaces can also contribute to green infrastructure and so could indirectly benefit biodiversity. These benefits include linkages between habitats and sites. The protection of visual amenity space would also protect any biodiversity interest.

9.159 The policy was also considered to be positive for **Community and Wellbeing**. The protection of visual amenity space will promote community wellbeing by providing open views and spaces that people can enjoy as well as providing spaces for informal activities such as dog walking or for community events such as fetes. The criteria for the selection of visual amenity space include areas of historic and cultural significance, used by the public, and core areas associated with community facilities. The spaces have been identified by the communities through consultation and so represent what is important locally to them.

9.160 HC-D20 scored positively for **Historic Environment**. The criteria for selecting important visual amenity space include areas of historic and cultural significance. The designation will be applied within existing Conservation Areas as this status does not prevent the development of such land in principle. The policy reflects the importance of visual amenity space and its relationship with settlement character, the surrounding landscape or the cultural and historic traditions of individual settlements.

9.161 HC-D20 also scored positively for **Land**, as the protection of visual amenity space will safeguard land from development.

9.162 There are both positive and negative implications for **Economy and Employment**. The protection of visual amenity space could inhibit economic activity if a landowner wanted to develop the land for employment uses. However, the protection of such space will help to retain the overall character of places, which are important to the economy generally in terms of tourism.

- 9.163 HC-D20 scored negatively for **Housing** as the protection of visual amenity space could prevent the development of visual amenity space for housing, particularly given the constrained nature of many of Exmoor's settlements.
- 9.164 HC-D20 was considered to be neutral in relation to **Air Quality and Water Resources**, and **Climate Change and Adaptation to Flood Risk**. The explanatory text recognises that amenity space can provide multiple benefits. The main purpose is for visual amenity, although such spaces can also contribute to green infrastructure and so could indirectly benefit air quality and water resources, and could potentially include areas that are in the functional floodplain or flood risk zones. Adaptation to climate change could require developments in settlements e.g. replacement development which may override the visual amenity space.
- 9.165 No specific implications were identified in relation to the SA topics of **Climate Change Mitigation and Energy, Coast and Transport**.

HC-S7: Residential Institutions

- 9.166 Policy HC-S7 supports the reuse of existing buildings as residential institutions such as care homes, nursing homes or residential educational facilities.
- 9.167 The policy is strongly positive in relation to **Community and Wellbeing** and **Housing** as it can help to address the housing needs of older people including those with support or care needs, in recognition of the ageing population. Proposals for residential institutions such as care homes should be located in settlements so that they can be integrated into the local community and be well located to enable access to services and facilities.
- 9.168 The policy will also be positive for the **Economy and Employment** as proposals for residential institutions could support the local economy and provide employment.
- 9.169 The policy is positive for **Landscape** and **Land** as it relates to the reuse of existing buildings, which will reduce land-take and impacts on landscape character. Proposals should not compromise local amenity or result in an unacceptable impact on the character of the area.
- 9.170 A positive score was also given in relation to **Historic Environment**, as the policy relates to the reuse of existing buildings, which could be positive in bringing traditional buildings back into viable use. Care will need to be taken to ensure that proposals do not damage the fabric or character of the building, and reference is made to policy CE-S5 on the conversion and structural alteration of buildings. For buildings identified as a heritage asset or within a Conservation Area, policies CE-S4 Cultural Heritage and Historic Environment and CE-D3 Conserving Heritage Assets will also apply.
- 9.171 A neutral score was given for **Biodiversity and Green Infrastructure**. The policy relates to the reuse of existing buildings, so should not significantly affect biodiversity and green infrastructure. It also cross refers to policy CE-S5 which should help to ensure the protection of bat and owl roosts.
- 9.172 A neutral score was also given in relation to **Climate Change and Adaptation to Flood Risk**. The policy relates to reuse of existing buildings rather than new build so utilises embodied energy, but consideration will still need to be taken of the vulnerability of use in relation to flood risk, particularly for care homes or nursing homes which are classified as 'more vulnerable'. Such uses should not be allowed in Flood zones 3b, and the exceptions test should be applied to proposals in flood

zone 3a¹⁶. There should also be consideration of other climate change adaptation implications, in relation to heating and cooling.

- 9.173 There could be both positive and negative implications for **Air Quality and Water Resources, Climate Change Mitigation and Energy, and Transport**. The policy relates to the reuse of existing buildings which will be positive in relation to the use of embodied energy, and air and water quality. However, the nature of their use as nursing homes, care homes or educational facilities could require additional resources such as water supplies and energy, particularly where they are caring for elderly people, although previous uses as hotels for example would have had similar requirements. Where possible, sustainable resource use should be encouraged through for example energy efficiency measures or use of renewable energy technologies if appropriate – this is encouraged in the supporting text. The change of use could result in additional travel movements and parking requirements, for example in relation to residential educational facilities, and the policy states that a transport assessment may be required. Reference is made to AC-D1 Transport and Accessibility Requirements for Development, and AC-D2 Parking Provision and Standards.
- 9.174 No specific implications were identified in relation to the **Coast**.

Recommendations

- 9.175 The following recommendations were made in relation to the policies for Achieving a Thriving Community in a draft version of the 2015 SA report:

HC-S7: Residential Institutions

- It was 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. *This recommendation was addressed in the final version of the Publication Draft Local Plan (2015), and the policy now requires proposals to mitigate the effects of climate change and adapt to its impacts including avoiding areas at risk of flooding.*
- It was recommended that the policy encourages sustainable resource consumption and the use of renewable of energy. *This recommendation was addressed in the final version of the Publication Draft Local Plan (2015), and the supporting text to the policy now makes reference to encouraging sustainable resource consumption.*

¹⁶ CLG Technical Guidance to the National Planning Policy Framework 2012

10 Appraisal of Publication Draft Local Plan Policies – Chapter 7: Achieving a Sustainable Economy including Proposed Main Modifications

10.1 This Chapter covers the following Policies:

- 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

10.2 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. No changes have been made to the policy names and numbers in this section of the Local Plan although there have been changes to policy wording and these are addressed in the updated appraisal of likely effects described in this chapter.

10.3 A summary of the scores for these policies is given in **Table 10.1** overleaf.

Table 7 Summary score for Local Plan Policies – Chapter 7: Achieving a Sustainable Economy

SA Topics	SA Objectives	SE-S1	SE-S2	SE-S3	SE-D1	SE-D2	SE-S4
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.	0	0	-	+	0	+
Biodiversity and green infrastructure	2) To conserve and enhance biodiversity and to protect, conserve and enhance all habitats and species.	+	0	0	0	0	+
Climate change and adaptation to flood risk	3) To minimise and manage the risk of all forms of flooding.	+	0	0	0	0	0
	4) To minimise the impacts of climate change on Exmoor's communities and habitats.	+	0	0	0	0	0
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.	+	+	+	+	+	0
Community wellbeing	6) To promote and support thriving and inclusive communities, health and wellbeing.	+	+	+	++	++	+
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.	+	+	+	++	++	+
Historic environment	8) To maintain and enhance the quality of the built environment.	+	+	+	0	0	+
Housing	9) To help ensure that National Park communities have access to appropriate, good quality, sustainable, affordable housing.	+	0	0	+	+	0
Land	10) To promote sustainable forms of development and 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.	+	+	+	+	+	+

SA Topics	SA Objectives	SE-S1	SE-S2	SE-S3	SE-D1	SE-D2	SE-S4
Landscape	12) To protect, maintain and enhance the special qualities of the Exmoor National Park's landscape character.	+	+	+	+	0	++
Coast	13) To protect and/or enhance coastal areas.	0	0	0	0	0	0
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.	+	+	-	+	0	0

Overall assessment of Chapter 7: Achieving A Sustainable Economy

- 10.4 Overall, it can be seen that the policies in Chapter 7: Achieving a Sustainable Economy are positive or neutral in relation to most of the sustainability objectives. The policy approaches 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 objectives as might have been expected.
- 10.5 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.
- 10.6 In the open countryside, Policy SE-S3 provides opportunities for employment development through the extension of existing employment buildings and the reuse of existing traditional buildings in farmsteads or hamlets. The policy also provides for the conversion of non-traditional buildings where it will support the diversification of rural land-based businesses 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.
- 10.7 The following sections set out the SA findings for each policy in more detail.

SE-S1: A Sustainable Exmoor Economy

- 10.8 Policy SE-S1 'A Sustainable Exmoor Economy' seeks to positively encourage business and employment development to help to strengthen, enhance and diversify the Exmoor economy and create employment. The policy also seeks 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.
- 10.9 SE-S1 was considered to be positive for the SA theme of **Landscape**. Proposals for business and employment development must demonstrate that they will not have an unacceptable adverse impact on the special qualities of the National Park, which includes the character of the landscape.

- 10.10 SE-S1 was given a positive score in relation to the SA theme of **Economy and Employment**, and not strongly positive as might have been expected. Although the policy is primarily aimed at supporting the economy and employment, business development has to be appropriate within the National Park context and there will consequently be some restrictions on the type and scale of business development allowed.
- 10.11 SE-S1 was positive for **Biodiversity and Green Infrastructure** and **Historic Environment**. Proposals for business and employment development must demonstrate that they will not have an unacceptable adverse impact, including on the special qualities of the National Park, which is taken to cover those topics.
- 10.12 SE-S1 was positive for the SA themes **Transport** and **Climate Change Mitigation and Energy**. The policy encourages opportunities for home working and home based employment which should help to reduce the need to travel and therefore should help to minimise emissions from transport.
- 10.13 SE-S1 supports the SA objectives relating to **Community and Wellbeing** and **Housing** as economic development and employment will be positive for local communities. The policy supports home working and proposals for business and employment development must not have an unacceptable impact on amenity.
- 10.14 The policy was given a neutral score in relation to the SA theme of **Air Quality and Water Resources**. Generally economic activity on Exmoor is not large scale and does not involve major industrial processes. The impacts on air and water quality are therefore likely to be neutral. The measures in the policy to encourage home working should also benefit air quality as a result of reduced air pollution from transport.
- 10.15 SE-S1 was also given a neutral score in relation to the SA Themes of **Climate Change and Adaptation to Flood Risk**, and **Coast**. There is no reference to climate change adaptation or flood risk, although proposals for business and employment development would not be encouraged in areas of flood risk. A neutral score on the theme of **Land** was also given as the policy would not directly influence the efficient use of land or waste minimisation.

SE-S2: Business Development in Settlements

- 10.16 Policy SE-S2 applies to business development in the named settlements. To ensure that the character of the National Park is conserved and enhanced, new employment sites and buildings will be focused in existing settlements and will be of a type, scale and design appropriate to the local and National Park context.
- 10.17 The policy was considered to be positive in relation to the theme of **Economy and Employment**. Within named settlements, the policy provides flexibility through encouraging the reuse of traditional buildings, and non-traditional buildings first, where this would allow enhancement where necessary to deliver an overall acceptable scheme, and finally new build. However, business development has to be appropriate within the National Park context and there will consequently be some restrictions on the type and scale of business development allowed. Consequently the policy was given a positive rather than strongly positive score for this theme. It is also positive for local communities and **Community and Wellbeing**.
- 10.18 The policy is also positive for **Transport** and **Climate Change Mitigation and Energy**. The location of new business development in or adjacent to the named settlements should help to reduce the need to travel, and potential emissions from

transport. The policy encourages reuse of existing traditional and non-traditional buildings. This will mitigate emissions and make the best use of embodied energy in existing buildings.

- 10.19 A positive score was also given in relation to the SA topics of **Landscape and Historic Environment**. Proposals must accord with SE-S1 (A Sustainable Exmoor Economy), which includes protection of landscape and the historic environment. Proposals for business and employment development must be well related to existing buildings, and appropriate to the scale and form of the settlement. Re-use of traditional buildings is encouraged and replacement of existing buildings would be permitted where they currently harm the character or appearance of the area, and this would achieve enhancement, for example to the landscape character or setting of the settlement.
- 10.20 A positive score was given for the SA topic of **Land**. The location of new business development in or adjacent to settlements and the reuse of existing buildings should help to reduce land-take. The reuse of previously developed sites in these settlements would be permitted where this provides opportunities for enhancement, for example the remediation of contaminated land.
- 10.21 The policy was considered to be neutral in relation to **Biodiversity and Green Infrastructure**. There is no direct reference to biodiversity, however, proposals must accord with SE-S1 (A Sustainable Exmoor Economy), which includes protection of biodiversity.
- 10.22 The policy was considered to be neutral in relation to **Air Quality and Water Resources**, as generally economic activity on Exmoor is not large scale and does not involve major industrial processes. The impacts on air and water quality are therefore not likely to be significant. The location of new business development in or adjacent to the named settlements should help to reduce the need to travel, and consequently potential emissions from transport.
- 10.23 A neutral score was also given in relation to **Climate Change and Adaptation to Flood Risk**. There is no reference to climate change adaptation or flood risk, although proposals for business and employment development would not be encouraged in areas of flood risk. However, proposals must comply with other Plan policies, which would include CC-S1 Climate Change and CC-D1 Flood Risk.
- 10.24 No specific implications were identified in relation to the SA topics of **Housing or Coast**.

SE-S3: Business Development in the Open Countryside

- 10.25 Policy SE-S3 applies to business development in the open countryside. In the open countryside, the policy provides opportunities for employment development through the change of use and conversion of existing traditional buildings. The policy also covers farm diversification through the re-use of a non-traditional building where this will help to sustain a farm or other land based business.
- 10.26 The policy was considered to be positive in relation to **Economy and Employment and Community and Wellbeing** as it provides flexibility to allow some business development and employment for communities in the hamlets outside the named settlements. It also provides flexibility for agricultural diversification, in order to support local farming communities. However, business development has to be appropriate within the National Park context and there are consequently restrictions on development in the open countryside which will affect the type and scale of

business development allowed. Consequently the policy scores positive rather than strongly positive for these themes.

- 10.27 The policy is also positive for the SA topic of **Landscape** as it requires that where the conversion or extension of buildings, or new business premises (through the redevelopment of existing employment sites) in the countryside are proposed, they are well-related to an existing group of buildings and are compatible with local landscape character. This will help to avoid inappropriate development having adverse visual impacts, which will also have indirect positive effects on the **Historic Environment**. The policy relates to reusing existing buildings, or extensions to existing businesses, which will reduce impacts on landscape character from new development and proposals will only be permitted where the scale and appearance of the development are acceptable, for example use of buildings which stand alone or do not relate well to existing buildings will not be permitted.
- 10.28 The policy is also positive for **Land** as it relates to the reuse of existing buildings, or extensions to existing businesses, which will reduce potential land-take. The policy allows flexibility for diversification of existing agricultural businesses, which will help to sustain existing land-based activity and consequently land management which is important to conservation of the National Park's special qualities.
- 10.29 A positive score was also given in relation to the SA topic of **Climate Change Mitigation and Energy**. The policy encourages the reuse of existing traditional buildings (and non-traditional buildings on farms). This will mitigate emissions and make the best use of embodied energy in existing buildings.
- 10.30 A negative impact is identified for the topic of **Transport** as the location of new business activity in the open countryside could lead to increased travel movements and consequently emissions. For the same reason, a potential negative impact on **Air Quality and Water Resources** is identified.
- 10.31 A neutral score was given in relation to **Climate Change and Adaptation to Flood Risk** and similarly no specific implications were identified in relation to the SA topics of the **Coast, Biodiversity and Green Infrastructure** and **Housing**.

SE-D1: Home Based Businesses

- 10.32 SE-D1 supports home working through allowing home based businesses of an appropriate scale and activity. This includes use of a residential property, a small extension, conversion of existing outbuildings within the curtilage or where these are not available, new small scale buildings within the curtilage.
- 10.33 The policy is strongly positive for the **Economy and Employment** and **Community and Wellbeing** as it provides flexibility for home working, in order to support local communities including those living in the hamlets outside the named settlements. A high percentage of people work from home in the National Park, so this is particularly important. There are caveats to ensure that proposals do not cause adverse impact on the amenity of the area or occupiers of neighbouring properties.
- 10.34 The policy is positive for **Landscape** and **Land**, as it seeks to minimise land-take through the re-use of existing buildings and also ensure that any new buildings are within the curtilage or close to existing buildings, which will reduce impacts on landscape character. Proposals should not cause adverse impact on the landscape or amenity of the area and must accord with policy HC-D15: Residential Extensions.

- 10.35 A positive score was also given for **Air Quality and Water Resources, Climate Change Mitigation and Energy** and **Transport** as the policy encourages home working which will reduce the need to travel and therefore emissions. Impacts on the amenity of the area including from potential additional traffic generation and access, have to be considered.
- 10.36 A positive impact on **Housing** is identified as the measures in the policy to protect local amenity where there are home-based businesses should help to ensure that the quality of neighbouring residential properties is not adversely affected.
- 10.37 A neutral score was given in relation to **Biodiversity and Green Infrastructure** and **Historic Environment** and similarly no specific implications were identified for the SA topics of **Climate Change and Adaptation to Flood Risk** or **Coast**.

SE-D2: Safeguarding Existing Employment Land and Buildings

- 10.38 There is a finite supply of employment land in the National Park, and a limited supply of greenfield land for development, so the policy approach is to safeguard existing employment sites and premises for economic uses. Any proposals that would involve the loss of employment land or buildings would not be permitted unless certain tests of viability are met and consideration is given to the reuse of the site for community uses or affordable housing.
- 10.39 The policy is strongly positive for the **Economy and Employment** and **Community and Wellbeing** as it seeks to safeguard employment sites and premises, therefore supporting employment in local communities. If it is demonstrated that the site is no longer viable for employment uses, then redevelopment for community use or affordable housing is favoured.
- 10.40 The policy is positive for **Land**, as safeguarding existing employment sites and premises reduces the need for additional new sites and premises which could reduce land-take.
- 10.41 A positive score was given for **Housing** as if it is demonstrated that the site is no longer viable for employment uses then redevelopment for community use or affordable housing is favoured.
- 10.42 The policy is positive for **Climate Change Mitigation** and **Energy** as safeguarding existing employment sites and premises reduces the need for additional new sites and premises which could reduce potential emissions.
- 10.43 The policy was considered to be neutral for the remaining SA topics. In relation to **Landscape**, if it is demonstrated that the site is no longer viable for employment uses, then redevelopment for community use or affordable housing is favoured. This may have landscape impacts, but this would be covered by other policies in the Plan. There is no reference to **Climate Change and Adaptation to Flood Risk**, although this would be covered by other policies in the Plan if it was an issue. Generally economic activity on Exmoor is not large scale and does not involve major industrial processes. The impacts on **Air Quality and Water Resources** are therefore not likely to be significant. In relation to **Transport**, safeguarding existing employment sites and premises reduces the need for additional new sites and premises which could reduce the need to travel and also potential emissions. If it is demonstrated that the site is no longer viable for employment uses, then redevelopment for community use is favoured or housing (in accordance with relevant policies in the Plan). This may have transport implications, but these would be covered by other policies in the Plan (Chapter 9: Achieving Accessibility for All).

- 10.44 No specific implications were identified in relation to the SA topics of **Biodiversity and Green Infrastructure, Historic Environment, and Coast**.

SE-S4: Agricultural and Forestry Development

- 10.45 Policy SE-S4 covers agricultural and forestry development which requires planning permission.
- 10.46 The policy is strongly positive for **Landscape**. By its nature and location, agricultural and forestry development could have impacts on the landscape, so strict policy safeguards are included to avoid this. The policy requires proposals to be sited appropriately and to be of an appropriate design that responds to and reinforces landscape character. A landscaping scheme may be required to reduce visual impacts. Applicants would need to demonstrate exceptional circumstances for proposals for new buildings in isolated locations in the open countryside.
- 10.47 The policy is positive for the **Economy and Employment** as it seeks to provide flexibility for necessary agricultural and forestry development, providing a functional need can be demonstrated. However, there are still restrictions on the type and scale of development that would be considered appropriate in the National Park, particularly in isolated areas, which is why the score is positive and not strongly positive. The policy is also positive for **Community and Wellbeing** as it will support local farming communities, and safeguards the amenity of other residents by requiring that proposals do not generate a level of activity that would have an adverse impact on the locality or enjoyment of the National Park.
- 10.48 A positive score was given in relation to the SA topic of **Land**. Overall the policy is intended to support ongoing management of land.
- 10.49 A positive score was given for **Air Quality and Water Resources**. The policy requires proposals to not cause pollution and specific reference is made in the text to protection of water quality through provision of covered storage for slurry. The text also refers to the design of tracks to ensure that water run-off and sedimentation of watercourses are minimised.
- 10.50 The policy is also positive for the **Historic Environment and Biodiversity and Green Infrastructure**. The policy requires proposals to have acceptable impact on cultural heritage and wildlife. There are many important historic farmsteads in the National Park, and any proposals for agricultural or forestry development should not impact on the character and setting of these heritage assets. Similarly, care needs to be taken that impacts on the wider historic landscape and heritage assets such as archaeology are avoided. The supporting text refers to impacts on sites of nature conservation including SSSIs and European sites.
- 10.51 A neutral score was given in relation to **Climate Change Mitigation and Energy and Climate Change and Adaptation to Flood Risk**. There is no specific reference to climate change and adaptation to flood risk, although development proposals should not exacerbate flood risk, for example through large areas of hard standing and run-off. The supporting text to the policy makes reference to the changes in agriculture and forestry that may occur due to climate change including mitigation measures such as increased demand for renewable energy including biomass, which may bring with it the need for associated buildings or facilities such as drying sheds for timber. The text also refers to the design of tracks to ensure that water run-off and sedimentation of watercourses are minimised – these issues may be exacerbated by climate change.

- 10.52 A neutral score was given in relation to **Transport**. Transport implications are not specifically referenced. However, proposals should not generate a level of activity that would have an adverse impact on the locality or the enjoyment of the National Park, which could include traffic. Agricultural and forestry development can often involve large machinery, and impacts on existing transport infrastructure particularly historic bridges and fords should be taken into account.
- 10.53 No specific implications were identified in relation to **Housing** or the **Coast**.

Recommendations

- 10.54 The following recommendation was made in relation to the policies for Achieving a Sustainable Economy in a draft version of the 2015 SA report:

SE-S4: Agricultural and Forestry Development

- It was 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. *This recommendation was addressed in the final version of the Publication Draft Local Plan (2015).*

11 Appraisal of Publication Draft Local Plan Policies – Chapter 8: Achieving Enjoyment for All including Proposed Main Modifications

11.1 This chapter covers the following Policies:

- RT-S1: Recreation and Tourism
- RT-D1: Serviced Accommodation
- RT-D2: Staff Accommodation
- RT-D3: Safeguarding Serviced Accommodation
- RT-D4: Non-serviced Accommodation
- RT-D5: Tented Camp Sites
- RT-D6: Camping Barns
- RT-D7: Certificated Caravan and Touring Caravan Sites
- RT-D8: Static Caravan Sites
- RT-D9: Alternative Camping Accommodation
- RT-D10: Recreational Development
- RT-D11: Equestrian Development
- RT-D12: Access Land and Rights of Way
- RT-D13: Safeguarding Land Along Former Railways
- RT-S2: Reinstatement of the Lynton and Barnstaple Railway

11.2 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. No changes have been made to the policy names and numbers in this section of the Local Plan although in most cases there have been changes to policy wording and these are addressed in the updated appraisal of likely effects described in this chapter.

11.3 A summary of the scores for these Policies is given in **Table 11.1** below.

Table 11.1 Summary score for Local Plan Policies – Chapter 8: Achieving Enjoyment for All

SA Topics	SA objectives	RT-S1	RT-D1	RT-D2	RT-D3	RT-D4	RT-D5	RT-D6	RT-D7	RT-D8	RT-D9	RT-D10	RT-D11	RT-D12	RT-D13	RT-S2
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.	+	0	0	0	0	0	+	0	0	+	+	+	+	+	+/-
Biodiversity and green infrastructure	2) To conserve and enhance biodiversity and to protect, conserve and enhance all habitats and species.	+	0	+	0	+	+	+	+	+	+	+	+	+	0	+
Climate change and adaptation to flood risk	3) To minimise and manage the risk of all forms of flooding.	+	0	0	0	0	+	0	+	+	+	0	0	0	0	0
	4) To minimise the impacts of climate change on Exmoor's communities and habitats.	+	0	0	0	0	+	0	+	+	+	0	0	0	0	0
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.	+	+	0	0	+	0	+	0	0	+	+/-	+	+/-	+	+/-
Community wellbeing	6) To promote and support thriving and inclusive communities, health and wellbeing.	+	+	0	0	+	+	0	+	+	0	+	+	+	+	0
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.	+/-	+	+	+	+	+	+	+	+	+	+/-	+	+	+	+
Historic environment	8) To maintain and enhance the quality of the built environment.	++	+	+	0	+	0	0	+	0	+	+	+	+	+	++
Housing	9) To help ensure that National Park communities	0	+	+	0	+	0	0	0	0	0	0	0	0	0	0

SA Topics	SA objectives	RT Objectives														
		RT-S1	RT-D1	RT-D2	RT-D3	RT-D4	RT-D5	RT-D6	RT-D7	RT-D8	RT-D9	RT-D10	RT-D11	RT-D12	RT-D13	RT-S2
	have access to appropriate, good quality, sustainable, affordable housing.															
Land	10) To promote sustainable forms of development and sustainable use of natural resources.	+	+	+	0	+	+	+	0	0	0	+	+	+	+	+
	11) To reduce all forms of waste production and promote reuse and recycling and minimise the risk of contaminated land.	+	+	+	0	+	+	+	0	0	0	+	+	+	+	+
Landscape	12) To protect, maintain and enhance the special qualities of the Exmoor National Park's landscape character.	+	+	+	0	+	+	+	+	+	+	+	++	+	0	+
Coast	13) To protect and/or enhance coastal areas.	+	0	0	0	0	0	0	0	0	0	0	0	0	0	+
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.	+	+	0	0	+	0	0	0	0	+	+	+	+/-	+	+/-

Overall Assessment of Chapter 8: Achieving Enjoyment for All

- 11.4 This chapter sets out the policies relating to recreation, tourism and environmental education development which will help to increase public enjoyment and understanding of Exmoor National Park and its special qualities, reflecting the second statutory purpose of National Parks. Proposals for such developments will be supported where facilities and activities accord with the principles of sustainable tourism.
- 11.5 The policies 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.
- 11.6 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.
- 11.7 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.
- 11.8 There are mixed implications for the **Economy and Employment**. 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.
- 11.9 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.
- 11.10 The following sections set out the SA findings for each policy in more detail.

RT-S1: Recreation and Tourism

- 11.11 Tourism and associated recreation activities are recognised as the main contributors to the Exmoor economy, and the importance of tourism in Exmoor is expected to continue and increase in the long term. Policy RT-S1 is intended to support this

trend, through helping to increase the awareness of the understanding and public enjoyment of Exmoor National Park and its special qualities, reflecting the second statutory purpose of National Parks. However, the policy also recognises that Exmoor's natural environment is central to the prosperity of the sector and where irreconcilable conflicts exist between conservation and public enjoyment then conservation interest should take priority - known as the 'Sandford Principle' (see policy GP1). However, such irreconcilable conflicts very rarely occur in the National Park.

- 11.12 RT-S1 scored positively for **Air Quality and Water Resources**. The policy seeks to promote sustainable tourism, the definition given (based on The European Charter) includes the protection and preservation of natural, cultural and social resources, which would include air quality and water resources. The text also identifies minimising environmental impact and resource use as one of the key challenges that must be addressed to ensure that tourism is sustainable. Air quality on Exmoor is generally good, and levels of traffic are relatively stable, but emissions from traffic during peak tourism periods could result in localised deterioration, although this is unlikely to exceed air quality standards. RT-S1 (criterion (d)) requires recreation or tourism development that would generate significant transport movements to be accessible by sustainable travel modes. The influx of visitors during the tourism season could put pressure on water resources and the policy context states that proposals should be mindful of water conservation, cross referencing with policy CC-D2 Water Conservation.
- 11.13 RT-S1 scored positively for **Biodiversity and Green Infrastructure, Landscape and the Coast**. As identified above, the policy seeks to promote sustainable tourism, and the definition given (based on The European Charter) includes the protection and preservation of natural resources which would include wildlife and landscape. The general policy (Policy GP1) context set out for the Local Plan refers to the Sandford Principle, where the protection of natural beauty and wildlife would take precedence over promoting enjoyment of National Parks if there was an irreconcilable conflict between the two statutory purposes. The text of Policy RT-S1 recognises that the natural environment including wildlife and landscape is a major attraction for visitors. The policy aims to ensure that sports and recreational activities are compatible with landscape and wildlife, and to promote opportunities to enhance green infrastructure. Developments will have to be compatible with their location and setting and the change of use of existing buildings for recreation and tourism developments will be continued to be encouraged. The policy requires proposals to not adversely affect the National Park's special qualities and its natural environment, solely or cumulatively; although landscape, the coast and wildlife are not specifically mentioned. The policy also encourages significant environmental enhancements, which would include wildlife and landscape.
- 11.14 RT-S1 scored positively for **Historic Environment**. Again, the definition of sustainable tourism includes the protection and preservation of natural, cultural and social resources, which would include cultural heritage. The Sandford Principle (Policy GP1) would give precedence to the protection of cultural heritage over promoting enjoyment of the National Park if there was an irreconcilable conflict between the two statutory purposes. The focus is on promoting sustainable tourism and recreation that is compatible with the National Park's special qualities including cultural heritage. The text recognises that cultural heritage is a major attraction for visitors. The policies aim to ensure that sports and recreational activities are compatible with cultural heritage. The general policy context of the Plan requires

that proposals to be consistent with policy GP1 (which includes cultural heritage); while Policy RT-S1 specially requires that development proposals do not adversely affect the natural and historic environment, solely or cumulatively. The policy stipulates that development proposals which would result in the restoration of existing buildings for recreational and tourism businesses should only be permitted if it is deemed to be appropriate.

- 11.15 RT-S1 also scored positively for **Climate Change Mitigation and Energy**, as this is recognised as one of the key challenges that must be addressed if tourism is to be sustainable (with specific reference contained within the policy context for a need to have regard for Policy CC-S1 Climate Change Mitigation and Adaptation). The policy supports re-use of buildings and sustainable modes of transport which will both help to reduce greenhouse gas emissions.
- 11.16 RT-S1 scored positively for **Community and Wellbeing**. Another key challenge in relation to sustainable tourism is to make opportunities for recreation are accessible for all, to enhance community prosperity and improve health and wellbeing of those living, working and visiting Exmoor. Tranquillity and quiet enjoyment are promoted, which are important for people's wellbeing and quality of life. Tourism development may help meet identified needs that are not provided by existing settlement facilities and benefit health and wellbeing (e.g. swimming pools). Tourism can bring an improved range of services and facilities due to greater use of local products and services by visitors. Environmental educational facilities are encouraged through the policy context, which will benefit local schools and support wellbeing of children from urban areas.
- 11.17 RT-S1 scored positively for **Land** as the policy encourages the reuse of traditional buildings where this accords with design principles, and enables the improvement of existing facilities including through restoration. These will both reduce the need for development on greenfield sites.
- 11.18 RT-S1 scored positively for **Transport** as it promotes safe access, walking, cycling, horse riding and public transport and supports opportunities to enhance the access network including provision of new access. The policy context highlights that where possible proposals should be accessible by more sustainable forms of transport as demonstrated by a travel plan if the proposal would result in a significant increase in traffic levels. The text also clarifies that use or intensification of sports and recreational activities in the National Plan should be compatible with Exmoor's rights of way.
- 11.19 There are both positive and negative implications of RT-S1 for the **Economy and Employment**. The text recognises the importance of the tourism sector for local economy and jobs. Tourism can bring benefits for jobs and the local economy including greater use of local products and services by tourism businesses as well as increased employment within the National park. The key challenges that must be addressed if tourism is to be sustainable include improving the quality of tourism jobs and reducing the seasonality of demand. The aim of the policy is to increase the diversity of visitor accommodation including through farm diversification, as well as supporting the improvement of existing facilities. Whilst the policy is generally positive for the economy, 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 the National Park including motorised sporting activities and clay-pigeon shooting.

- 11.20 RT-S1 scored positively in relation to **Climate Change and Adaptation to Flood Risk**. Climate change is recognised as one of the key challenges that must be addressed if tourism is to be sustainable. The supporting text of the policy refers to the need for tourism and recreation development to have regard for design, siting and location issues in relation to policies CC-S1 Climate Change Mitigation and Adaption and CC-D1 Flood Risk.
- 11.21 The policy does not directly relate to **Housing**, although the recreation and tourism sector has an impact on the availability of affordable housing due to the high demand for accommodation. This is not something that can be directly controlled through planning, although the development management policies cover issues relating to change of use (from house to hotel for example). RT-S1 requires proposals to contribute towards a sustainable future for Exmoor's local economy and communities.

RT-D1: Serviced Accommodation

- 11.22 Policy RT-D1 relates to serviced accommodation, (more generally referred to as Bed & Breakfast establishments, guesthouses and hotels) which forms a considerable proportion of the visitor accommodation available in the National Park. The policy covers change of use of existing buildings into serviced accommodation, based on the results of extensive consultation which identified that this was suitable in many locations across the National Park. Limited extensions are also allowed.
- 11.23 The policy is positive for the SA theme of **Landscape**, as it requires proposals for the provision of new serviced accommodation to conserve or enhance the traditional character, appearance and setting of the building or building group. It is also specified that the design of access and parking requirements must be compatible with landscape character. The policy is also positive for **Land** as it relates to the conversion/reuse of existing buildings, and in relation to **Climate Change Mitigation and Energy** because this uses existing buildings with embodied energy, without requiring new construction.
- 11.24 The policy was considered to be positive in relation to **Community and Wellbeing**, as it seeks to retain existing and encourage new serviced accommodation, which often provides a social function, for example providing a public bar, function room or skittle alley. The running of guesthouses is often a lifestyle choice and so the ability to revert back to residential use (for example if the owners wish to retire) without the requirement for planning permission is positive, and this is reflected in the supporting text of Policy RT-D1.
- 11.25 The policy was also considered to be positive in relation to **Housing** as it allows for the flexible use of dwellings as serviced accommodation, with the ability over the longer term to be occupied as a dwelling or run as a hotel/guesthouse.
- 11.26 RT-D1 constrains significant alteration or extension so is likely to be positive for the **Historic Environment**.
- 11.27 There are also positive and negative implications for **Economy and Employment**. The policy encourages new serviced accommodation, but only refers to change of use of existing buildings. The supporting text highlights that no new build will be allowed, as occupancy evidence demonstrated there was sufficient opportunity with existing buildings.
- 11.28 The policy is positive in relation to the SA topic of **Transport**, as it requires that any change of use to serviced accommodation would need to demonstrate that traffic

generation can be accommodated by the local road network without adversely affecting road safety and capacity.

11.29 For the remaining SA topics, a neutral score was given.

RT-D2: Staff Accommodation

11.30 Policy RT-D2 deals with requirements for staff accommodation where alternative accommodation cannot be found in the local area, or be provided within the hotel premises.

11.31 The policy is positive for **Economy and Employment** as it aims to ensure that appropriate accommodation is available to support businesses such as hotels. It is therefore also positive for **Housing**, particularly as it is specified that where the staff accommodation is no longer required, it could be used for local affordable housing.

11.32 As the policy would only apply in relation to change of use of existing buildings or small-scale extensions, the policy is not likely to result in development of new buildings or larger-scale extensions, which could be more likely to have environmental impacts and result in more land take. The policy is therefore positive for **Land, Landscape, Biodiversity and Green Infrastructure** and the **Historic Environment**. It is also positive for **Climate Change Mitigation and Energy** as it is primarily about change of use, which is positive from a climate change mitigation perspective as this uses existing buildings with embodied energy, without requiring new construction.

11.33 For the remaining SA topics, a neutral score was given.

RT-D3: Safeguarding Serviced Accommodation

11.34 Policy RT-D3 seeks to safeguard existing serviced accommodation, due to many such facilities being lost to residential use. The policy seeks to limit change of use from serviced accommodation to other commercial use. However, it enables some hotels and guesthouses that were formerly single dwellings to revert to a dwelling if they meet certain tests.

11.35 The policy is positive in relation to **Economy and Employment** as it aims to ensure that serviced accommodation is not lost to other uses. This will support the tourism industry which is crucial to the Exmoor economy. Change of use can be permitted where another employment use is to be created in the existing building. The policy also includes flexibility to allow for the change of use where it is demonstrated that the current use is not viable.

11.36 RT-D3 allows change of use to residential dwellings where it has been demonstrated that continued use as serviced accommodation is not viable. It also allows change of use to residential where it can be demonstrated that it was formally a single residential dwelling and cross-refers to HC-S4 Principal Residence Housing. The policy is therefore positive for **Housing**.

11.37 For the remaining SA topics a neutral score was given.

RT-D4: Non-Serviced Accommodation

11.38 Policy RT-D4 covers non-serviced, or self-catering, accommodation. There are a wide range of holiday homes available within the National Park, although this has caused problems for some local communities particularly in popular holiday destinations, as it reduces the availability of local housing and can also affect the

vitality of local communities during the out-of-season period. Whilst the National Park Authority cannot directly control or influence the use of existing open market homes as holiday cottages, the policy does seek to control the change of use and conversion of existing buildings to holiday accommodation and restrict the development of new units for this purpose.

- 11.39 Policy RT-D4 could benefit **Community and Wellbeing** and **Housing** by allowing the conversion of non-serviced accommodation that is no longer needed or viable into local need housing as in accordance with policy HC-D13. It also includes a clause that permits the replacement of holiday accommodation with local affordable housing need where the holiday accommodation is no longer needed or viable, and requires there to be no adverse impacts on tranquillity and amenity which will benefit the local community and wellbeing of residents.
- 11.40 The policy was also considered to be positive in relation to **Landscape** and the **Historic Environment** as it requires proposals for the conversion of buildings to non-serviced accommodation to conserve or enhance the character and appearance of the building and its setting and to accord with policies on landscape character, cultural heritage and design. It is also specified that where traditional farm buildings are proposed for change of use, it will not be permissible for all such buildings to be converted in order to protect the historic character and significance of the buildings collectively.
- 11.41 RT-D4 is positive for **Transport** as it states that the local road network must have capacity to service the accommodation without adversely affecting road safety.
- 11.42 As the policy relates to the conversion of existing buildings and will not permit new build holiday lets, it is less likely to have environmental impacts and so is positive for **Biodiversity and Green Infrastructure**. It is also positive in relation to **Climate Change Mitigation and Energy** as this uses existing buildings with embodied energy, without requiring new construction. The policy is also positive for **Land**.
- 11.43 The policy is positive in relation to **Economy and Employment** as it supports change of use to non-serviced accommodation in appropriate circumstances which will support the local tourism industry.
- 11.44 The policy is neutral for the remaining SA topics.

RT-D5: Tented Camp Sites

- 11.45 Policy RT-D5 allows proposals for new camp sites or small extensions to existing sites, where this is compatible with National Park purposes and provides criteria against which the provision of facilities will be assessed.
- 11.46 The policy is positive for **Economy and Employment** as it supports the tourism industry and includes clauses to protect the local environment and amenity which will help to encourage tourists in the longer term.
- 11.47 The policy requires campsites to be well-related to a settlement, hamlet or farmstead and to be sensitively sited so that there are no adverse impacts on landscape character, visual amenity or sensitive wildlife habitats and species. It is therefore positive for the **Landscape** and **Biodiversity and Green Infrastructure**. The benefits for those SA themes are reinforced by the requirement for any required facilities to be provided through the conversion of existing buildings rather than new build – this will also benefit **Land**.

- 11.48 The policy is positive for **Transport** as it requires there to be existing road access to tented camp sites and sufficient road capacity to serve the site.
- 11.49 The policy is also positive for **Climate Change Adaptation and Flood Risk** as it requires campsites to be located outside high flood risk areas. This will also benefit **Community and Wellbeing**.
- 11.50 The policy is neutral for the remaining SA topics.

RT-D6: Camping Barns

- 11.51 Policy RT-D6 supports the provision of a network of camping barns, particularly where this can bring redundant buildings back into use, although more stringent criteria are provided for conversion proposals in isolated locations, to protect their character.
- 11.52 The policy was considered to be positive in relation to **Landscape** as the conversion of existing buildings to camping barns should be consistent with their setting within the landscape, and isolated camping barns will only be allowed where this contributes to wider landscape character.
- 11.53 The policy was also considered to be positive in relation to **Air Quality and Water Resources**. RT-D6 recognises that camping barns in isolated locations are likely to require minimal facilities and should only be provided on site where this can be done sustainably e.g. through composting toilets. It also includes consideration of biodiversity interests; therefore it scored positively for **Biodiversity and Green Infrastructure**.
- 11.54 The policy also scored positively for **Historic Environment** as it enables the change of use and alteration of traditional buildings into camping barns where this complements historic character, and supporting this CE-S5 Principles for the Re-use of Existing Buildings is referred to in the supporting text.
- 11.55 Policy RT-D6 camping barns relates to reuse of existing buildings which will reduce emissions through utilising the embodied energy of the buildings. Therefore, the policy is positive in relation to **Climate Change Mitigation and Energy and Land**.
- 11.56 The policy is considered to have positive implications for the **Economy and Employment** as it will support tourism and related to a more affordable form of accommodation.
- 11.57 The policy was considered to be neutral in relation to the remaining SA topics.

RT-D7: Certificated Caravan and Touring Caravan Sites

- 11.58 New commercial touring caravan sites and extensions to existing sites are not permitted by Policy RT-D7, as they are considered to be inappropriate within the National Park due to the significant visual impact they can have on landscape character. However, smaller certificated caravan sites (that are reserved exclusively for members of certain caravan and camping organisations) are encouraged, to help ensure that Exmoor continues to offer a diverse range of holiday accommodation.
- 11.59 RT-D7 is positive for the **Economy and Employment** as it relates to the provision of accommodation which will boost the tourism industry on Exmoor.
- 11.60 The policy requires sites to be well sited and integrated in the landscape, closely related to farmsteads, hamlets or settlements with appropriate landscape screening where necessary. They must also be in an area where there are no adverse

impacts on sensitive wildlife. Therefore, the policy is positive for **Landscape and Biodiversity and Green Infrastructure**.

- 11.61 The policy is also positive for the **Historic Environment** as it requires access and parking arrangements to be accommodated without adverse impacts on landscape character or the historic environment.
- 11.62 The policy is positive for **Climate Change Adaptation and Flood Risk** and **Community and Wellbeing** as it requires sites to be located away from high flood risk areas.
- 11.63 The policy was neutral in relation to the remaining SA topics.

RT-D8: Static Caravan Sites

- 11.64 Policy RT-D8 provides criteria to improve the quality of existing static caravan sites. New static caravan sites will not be permitted.
- 11.65 The policy is positive for **Landscape** as its primary aim is to enable the appearance of existing static caravan sites to be improved. It requires replacement accommodation to be of high quality sustainable design and to positively relate to landscape character. The policy is also positive for **Land** as it requires no extension to the existing site where replacement accommodation is provided.
- 11.66 It is also positive for **Economy and Employment** as it supports improvements to the quality of the static caravan sites already in place on Exmoor which should help to encourage more visitors as well as sustaining the existing tourism industry.
- 11.67 The policy includes a criterion permitting the replacement of existing static caravans where this involves the relocation of pitches to less sensitive areas – this could benefit **Biodiversity and Green Infrastructure**. It also permits this where the site is not located in an area with high probability of flooding, which will benefit **Community and Wellbeing** as well as **Climate Change Adaptation and Flood Risk**.
- 11.68 The policy was neutral for the remaining SA topics.

RT-D9: Alternative Camping Accommodation

- 11.69 Policy RT-D9 provides for small scale, low impact alternative camping proposals, which will provide a diversity of accommodation provision and may lead to a wider range of visitors to the National Park.
- 11.70 The policy is positive for a number of SA topics. In relation to **Economy and Employment**, it allows flexibility for diversification of land based businesses and other existing accommodation premises and will be positive for the local tourism industry. Due to the type of accommodation, proposals are likely to have a low environmental impact including: avoidance of site treatments such as excessive hard-standing; promoting high quality sustainable design and materials, which will minimise impacts on **Air Quality and Water Resources**. Proposals should demonstrate that the siting and landscaping strongly relate to the **Landscape and Historic Environment** of the area and is appropriate to its setting, and opportunities for enhancement design and management of the site and associated planting should be considered, as reflected in the supporting text of the policy. Proposals will be low impact due to their nature with limited facilities and emissions, helping to contribute to **Climate Change Mitigation and Energy**. Sustainable construction is

encouraged. Sustainable modes of **Transport** are encouraged and minimum parking should be provided.

- 11.71 A positive score was given in relation to **Biodiversity and Green Infrastructure**. The policy includes reinstatement of the site to its former use if the use becomes redundant, with reference to the improvement of the site in terms of supporting biodiversity and green infrastructure if this occurs. There could also be opportunities for enhancement through the design and management of the site and any associated planting e.g. for screening.
- 11.72 A positive score was given in relation to **Climate Change and Adaptation to Flood Risk**. The supporting text of policy RT-D9 Alternative Camping Accommodation recognises that these forms of accommodation may be more vulnerable to flooding and as such should not be located in areas with high probability of flooding. As such a sequential test is suggested and reference is made to policy CC-D1 Flood Risk.
- 11.73 The policy is neutral for **Land** as proposals are likely to be low impact, with limited treatments such as hard-standing. Sites will be restored to their former condition if the use ceases. Similarly, a neutral score was given for the **Coast**, as impacts on coastal landscape character and seascapes would be dealt with through demonstrating that the siting and landscaping strongly relate to the landscape and historic character of the area and is appropriate to its setting.
- 11.74 A neutral score was also given in relation to **Community and Wellbeing**. Proposals are likely to be low impact, particularly if they are well screened and are unlikely to have impacts on local communities or amenity.
- 11.75 No direct implications were identified in relation to the SA topic of **Housing**. Conditions will be used to restrict use to holiday use only and the structure will not be used as a permanent residence.

RT-D10: Recreational Development

- 11.76 Policy RT-D10 applies to recreational development within the National Park, and is intended to enable people to enjoy the National Park in a sustainable way consistent with RT-S1 Recreation and Tourism. The policy lists the criteria that would need to be met to enable recreational development to be permitted.
- 11.77 RT-D10 was considered to be positive in relation to **Air Quality and Water Resources and Transport**. The majority of recreational activities and facilities on Exmoor are small scale and dispersed, although there are large scale events such as the Ironman triathlon. Recreation and tourism activities that involve quiet enjoyment of the National Park are supported, and the supporting text reflects the importance of the rights of way and access network for recreation. However, there may be cumulative impacts arising from more intensive use or larger scale developments, for example large scale proposals could generate significant levels of traffic, which potentially would impact on air quality. Cumulative impacts on increased walking/cycling/riding could also lead to more erosion and consequent impacts on water quality from run-off and sedimentation. However, the policy guards against cumulative impacts, and the supporting text cross-refers to policy CC-S7: Pollution. The policy also requires that there is sufficient capacity in the existing local road network to service the development as well as requiring adequate access, parking and road capacity.

- 11.78 RT-D10 scored positively for **Biodiversity and Green Infrastructure**. Exmoor's wildlife is an important draw for visitors, including wildlife watching. The supporting text recognises that recreation facilities can also provide multiple functions including wildlife habitats, which would be supported. The provision of recreational facilities is supported provided these are compatible with the special qualities which include wildlife. Recreational development is focused in or adjoining the named settlements and special justification is required for proposals to be located in the open countryside. This will help to ensure that wildlife and habitats are protected in accordance with CE-S3 Biodiversity and Green Infrastructure. Recreational activities which conflict with the National Park's special qualities (including wildlife) are not considered appropriate although wildlife is not specifically mentioned. Golf courses and other activities can be damaging to wildlife through loss of habitats or disturbance. The policy requires the development to be removed and land restored to its former condition once the use ceases, with encouragement for environmental enhancement which could benefit biodiversity.
- 11.79 Policy RT-D10 was considered to be positive in relation to **Community and Wellbeing**. It covers recreational development, which could also benefit the local community and this should be reflected in the text. Facilities that specifically serve the needs of the local community would be assessed under HC-S6 Local Commercial Services and Community Facilities. Recreational pursuits focused on walking, cycling and so on will encourage health and wellbeing. The policy focuses recreational development in or adjoining named settlements (except where it can be demonstrated that a location in the open countryside is essential and acceptable) which would also benefit local communities.
- 11.80 RT-D10 scored positively **for Historic Environment**. Reuse of existing buildings is encouraged which could include traditional buildings where appropriate. The policy requires that the location, scale and intensity of use are appropriate in relation to the historic environment.
- 11.81 RT-D10 is also positive for **Land**. Recreational development is focused in or adjoining the named settlements and special justification is required for proposals to be located in the open countryside. Reuse of existing buildings is encouraged. These will help to minimise land take. The policy also requires the development to be removed and land restored to its former condition once the use ceases.
- 11.82 The policy was considered to be positive for **Landscape**. The explanatory text recognises that much of the recreational activity on Exmoor is based on people enjoying the special qualities including landscape and natural beauty. Proposals need to ensure that the location, scale and intensity of use are appropriate to landscape character and visual amenity (as details in the supporting text and in the text of policy RT-D10). Recreational development is focused in or adjoining the named settlements and special justification is required for proposals to be located in the open countryside. Reuse of existing buildings is encouraged. These points highlighted in the policy text will help to maintain landscape character. Proposals for recreational activities particularly noisy pursuits and activities that conflict with the special qualities including through visual intrusion and impacts on tranquillity are not considered to be appropriate and the supporting text cross references to RT-S1 Recreation and Tourism and CC-S7 Pollution in support of this. The need to minimise the visual impacts of game shoots is identified in the supporting text of the policy.

- 11.83 There are both positive and negative implications for **Climate Change Mitigation and Energy**. The majority of recreational activities and facilities on Exmoor are small scale and dispersed, although there are large scale events such as the Ironman triathlon. There may be cumulative impacts arising from more intensive use or larger scale developments. For example large scale proposals could generate significant levels of traffic, which potentially would lead to increased greenhouse gas emissions. However, the policy guards against cumulative impacts.
- 11.84 There are also potentially positive and negative implications for **Economy and Employment**. The supporting text recognises that recreational pursuits are important in supporting the local economy through tourism and providing employment including apprenticeships and training, and the policy refers to the contribution that recreational development makes to a sustainable local economy. Some recreational activities are not considered to be appropriate in the National Park due to their impacts e.g. noise or landscape such as golf courses, motor sports, which would restrict economic opportunities. However, such activities could also negatively impact on tourism and as such also have a negative effect on the local economy and employment. Recreational proposals that support a sustainable local economy would be supported, and the RT-D10 is considered to be positive overall for this SA topic as this is reflected in the policy.
- 11.85 RT-D10 was considered to be neutral in relation to **Climate Change and Adaptation to Flood Risk** and the **Coast**. There may be a need for recreational facilities to be adapted due to changing weather patterns and climate change; this would be covered by the policies in Chapter 5 Responding to Climate Change and Managing Resources. There is no specific reference to the coast, although this is one of the assets that people come to enjoy. The coast would be covered under the special qualities.
- 11.86 No specific implications were identified for the SA topic of **Housing**.

RT-D11: Equestrian Development

- 11.87 Equestrian activities are popular on Exmoor and are important for local communities, visitors and the local economy. However, the proliferation of equipment and facilities associated with keeping horses such as stabling, fencing and ménages can have a detrimental impact on landscape character and the access network if not managed carefully. The policy sets out the criteria that will guide equestrian development on Exmoor.
- 11.88 The policy was strongly positive in relation to the SA topic of **Landscape** as it requires proposals for equestrian development to be sensitive in terms of visual impact and to consider the landscape setting of the area in terms of intensity of use or activity. The supporting text of the policy also recognises that a cumulative detrimental impact on the landscape may result from proliferation of incongruous equestrian development and as such identifies this cumulative effect as a material consideration in the determination of planning applications. The text refers to policy CE-D1 Protecting Exmoor's Landscape and Seascape in support of this.
- 11.89 A positive score was given in relation to **Community and Wellbeing and Economy and Employment**. The policy would help to support equine tourism in the National Park given that it would provide for proposals for stabling at visitor accommodation businesses such as hotels. Riding is also a traditional activity for local communities

and can support wellbeing through improved access to leisure opportunities and healthy activities.

- 11.90 The policy was considered to be positive for **Biodiversity and Green Infrastructure and Historic Environment** as it requires that proposals for equestrian development do not adversely affect the natural environment of the surrounding area. The policy provides consideration of nature conservation through the regulation of horse numbers where this may impact on nature conservation. A land management plan should include protection of trees and hedges and the management of invasive species such as ragwort. Reuse of existing buildings should be consistent with CE-S5 Principles for the Conversion or Structural Alteration of Existing Buildings.
- 11.91 A positive score was given for the SA topic of **Land and Air Quality and Water Resources**. Equestrian development can fit in well with farming activities to help diversify rural economies, and although there could be loss of agricultural land to equestrian use, this use can be reverted back to agriculture. The policy encourages the reuse of existing buildings, which will reduce the need for land take. Land management plans for equestrian development are required which should address the management of grazing, waste, soil structure and so on, which will help to encourage good land management and prevent pollution. The supporting text requires horse waste to be stored and disposed of responsibly to avoid ground and water pollution (CC-S7 Pollution). The policy also states that proposals for equestrian development must demonstrate that they do not adversely affect the natural environment directly or indirectly through pollution.
- 11.92 The policy is also positive for **Climate Change Mitigation and Energy and Transport**. The intention is for horse related development to be close to the property it is intended to serve, reducing the need to travel and consequently emissions. Proposals are required to minimise impacts from increased traffic and where development is likely to generate increased levels of traffic the proposal should have regard to policies AC-D1 Transport and Accessibility Requirements for Development and AC-D2 Traffic. The reuse of existing buildings is encouraged, which will contribute to climate change mitigation through making the best use of embodied energy in existing buildings. There could be impacts on the rights of way network, but proposals are required to be well related to suitable networks of equestrian routes that are capable of supporting the additional usage.
- 11.93 The policy was considered to be neutral in relation to **Housing** and no specific implications were identified for **Climate Change and Adaptation to Flood Risk and Coast**.

RT-D12: Access Land and Rights of Way

- 11.94 Walking, cycling and horse-riding are popular recreational activities on Exmoor, utilising the extensive access network. The access network is defined as including Public Rights of Way, access land, statutory and permitted cycle routes, Policy RT-D12 safeguards the access network by ensuring that development proposals will not adversely affect it, and providing criteria for proposals that may affect the network to ensure that impacts are avoided or mitigated, users interests and protected, and enhancement is achieved.
- 11.95 RT-D12 scored positively for **Air Quality and Water Resources**. The policy promotes walking as a popular recreational activity on Exmoor, along with cycling and horse riding. The extensive access network provides an excellent basis for

these activities, which are often cited as the main reason for visiting the National Park, and also help in promoting the enjoyment of the National Park and therefore supporting the second purpose. Enjoying Exmoor through sustainable modes of travel such as walking, cycling and horse-riding will reduce emissions from transport, although there will still be emissions from travel to the National Park. Air and water quality are generally good on Exmoor, and are not likely to be adversely impacted by the policy.

- 11.96 RT-D12 also scored positively for **Biodiversity and Green Infrastructure and Historic Environment**. The policy requires that the access network is safeguarded by preventing adverse effects of potential development on it. There is also requirement that any proposals which adversely affect the access network should demonstrate that any harm will be kept to a minimum, which could include any impacts on biodiversity or historic environment. The access network forms an important component of the green infrastructure on Exmoor, and cross-referencing is made to CE-S3 Biodiversity and Green Infrastructure, and CE-D2 Green Infrastructure Provision in the supporting text in recognition of this importance in terms of protecting the existing access network. Policy RT-D12's penultimate bullet point includes demonstrating that opportunities have been sought to provide linkages between routes, which will also help strengthen the Green Infrastructure network. The policy also requires safeguarding the condition of the access network and its character and appearance, which would include the historic environment.
- 11.97 RT-D12 was considered to be positive in relation to **Community and Wellbeing**. The access network is a resource for local communities as well as those visiting the National Park and this is reflected in the supporting text of the policy. The benefits of walking, cycling etc. for healthier living are recognised, which will benefit local residents and visitors alike. The policy refers to "users' interests", which are defined in the supporting text as including the physical use and understanding, enjoyment and experience of the access network including views and tranquillity. The supporting text states that where proposals are likely to result in an increase in the intensity of vehicular use on shared access routes, applicants will need to demonstrate that the safety, ease of use and enjoyment of the access network by all users will be maintained.
- 11.98 The policy was also considered to be positive for **Economy and Employment**. The supporting text recognises the important influence the access network has on the number of visitors to Exmoor, and its contribution to the local economy of the area including for a significant number of local businesses. It also identifies the economic benefits from the existing access land. The policy seeks to safeguard the access network, maintaining its value to the local economy.
- 11.99 RT-D12 was positive for **Land and Landscape**. The policy aims to safeguard the access network and its condition, character and appearance which will promote sustainable use of land and help to protect landscape character. User interests are defined as including enjoyment of views and tranquillity. Increasing recreational pressure resulting from greater intensity of use of the access network could be detrimental for landscape character and tranquillity, particularly from certain uses such as more active sports or motorised vehicles. The policy requires that any proposals which adversely affect the access network should demonstrate that any harm will be kept to a minimum, which could include any impacts on landscape character.

- 11.100 There were both positive and negative implications in relation to **Climate Change Mitigation and Energy and Transport**. The policy promotes walking as a popular recreational activity on Exmoor, along with cycling and horse riding. The extensive access network provides an excellent basis for these activities, which are often cited as the main reason for visiting the National Park, and also help in promoting the enjoyment of the National Park and therefore supporting the second purpose. The supporting text identifies the access network as providing a means of sustainable transport and the important role it plays in contributing to the sustainable transport infrastructure in the National Park. The policy is specifically designed to safeguard public rights of way, and could indirectly improve opportunities for safe horse riding, cycling and walking as an alternative to car travel. Enjoying the National Park through sustainable modes of travel such as walking, cycling and horse-riding will reduce emissions from transport. However, there will still be emissions from travel to Exmoor, and the popularity of walking etc. as recreational activities will contribute to congestion and traffic particularly during the tourism season.
- 11.101 RT-D12 was considered to be neutral in relation to **Climate Change and Adaptation to Flood Risk and Coast**. Whilst there may be an increased need for maintenance of the access network and divert paths as a result of climate change, as identified in the supporting text, there are unlikely to be planning implications arising from this and it is not specifically covered in the policy. The policy requires any diversions and/or compensatory land to be of equal or better quality.
- 11.102 There were not considered to be any direct implications for **Housing**.

RT-D13: Safeguarding Land along Former Railways

- 11.103 RT-D13 relates to the safeguarding of land along the line of the former West Somerset Mineral Line and the Lynton and Barnstaple Railway for their recreation and historic value and their potential for sustainable modes of travel.
- 11.104 The policy is positive in relation to the **Historic Environment** as the safeguarding of the routes is intended to protect them as historic assets valuable to the cultural heritage of the National Park.
- 11.105 The policy is also positive for **Economy and Employment** and **Community and Wellbeing** as safeguarding the routes provides opportunities to improve access for all, both as potential rights of way routes or as a reinstated railway, which could also boost tourism. Safeguarding the routes also improves access to recreation, leisure and learning and cultural opportunities.
- 11.106 RT-D13 is positive for **Land** as it is intended to safeguard the routes as linear access routes, restricting other development that would prevent the reuse of the former railways.
- 11.107 There are likely to be positive effects in relation to **Climate Change Mitigation and Energy, Transport, and Air Quality and Water Resources** as safeguarding land for the potential future restoration of the railway line could be beneficial in terms of providing more sustainable forms of travel.
- 11.108 A neutral score was given in relation to the remaining SA topics.

RT-S2: Reinstatement of the Lynton and Barnstaple Railway

- 11.109 RT-S2 sets out the criteria under which proposals for reinstatement of the Lynton and Barnstaple Railway would be considered.

- 11.110 The policy was considered to be strongly positive in relation to the **Historic Environment**. The reinstatement of the Lynton and Barnstaple Railway should replicate the former railway using the original route and the siting and design of the associated structures and buildings, reflecting the traditional character of the original railway. Sustainable construction materials should be used unless they compromise the historical accuracy and appearance of the former railway.
- 11.111 The policy is also positive for **Economy and Employment** as the reinstatement of the Lynton and Barnstaple Railway could be positive in generating employment and supporting local contractors and suppliers, as well as boosting tourism.
- 11.112 A positive score was given in relation to **Landscape and Biodiversity and Green Infrastructure**. The supporting text requires the National Park Authority and local authorities to work together to ensure that any proposal for reinstatement of Lynton and Barnstaple Railway protects the National Park's landscape character and its setting as well as wildlife, habitats and sites of geological interest. Any potential impacts on coastal landscape character would be considered as part of the overall implications for landscape character. Therefore, the policy is also positive for **Coast**. The design of all aspects of a proposal should reflect the traditional character and appearance of the original railway and ensure that the proposed development is integrated in its setting. Landscaping should be incorporated as part of the proposal to conserve and enhance the National Park. The supporting text refers to the importance of former railway lines as wildlife corridors and providing links between habitats, which can also be part of the green infrastructure network, and requires proposals to take into account potential wildlife issues including impact on protected species along the route and associated buildings, with specific reference to CE-S3 Biodiversity and Green Infrastructure and CE-D2 Green Infrastructure Provision.
- 11.113 The policy is also positive for **Land** as sustainable construction methods are encouraged and policy RT-S2 proposes the reuse of original buildings associated with the former railway which will reduce land take, materials and site waste.
- 11.114 There could be mixed implications in relation to **Climate Change Mitigation and Energy, Transport, and Air Quality and Water Resources**. The restoration of the Lynton & Barnstaple railway line could be beneficial in terms of providing more sustainable forms of travel. However, the generation of traffic to the railway could be significant, and any impacts on air quality and carbon emissions would need to be considered as part of a detailed application. The policy requires a travel plan to be produced and to incorporate measures to enable safe access by walking, cycling and public transport and to minimise traffic generation and therefore emissions, cross-referring to AC-S1 Sustainable Transport. The policy encourages reuse of existing buildings, which will be positive in terms of embodied energy. The supporting text encourages use of sustainable construction materials. There are not likely to be significant impacts on water quality, except perhaps during any construction works.
- 11.115 A neutral score was given in relation to the remaining SA topics.

Recommendations

- 11.116 The following recommendation was made in relation to the policies for Achieving Employment for All in a draft version of the 2015 SA report:

RT-D10: Recreational Development

- It was recommended that the links between recreational development and the potential benefits for the local community are recognised in the supporting text to the policy. *This recommendation was addressed in the final version of the Publication Draft Local Plan (2015).*

12 Appraisal of Publication Draft Local Plan Policies – Chapter 9: Achieving Accessibility for All including Proposed Main Modifications

12.1 This Chapter covers the following Policies:

- AC-S1: Sustainable Transport
- AC-S2: Transport Infrastructure
- AC-D1: Transport and Accessibility Requirements for Development
- AC-D2: Traffic and Road Safety Considerations for Development
- AC-S3: Traffic Management and Parking
- AC-D3: Parking Provision and Standards
- AC-D4: Temporary Parking
- AC-S4: Electricity and Communications Networks
- AC-D5: Radio and Mobile Telecommunications Infrastructure
- AC-D6: Fixed Line Transmission Infrastructure
- AC-D7: Satellite Antennae

12.2 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 regards to wildlife and seascape character. No changes have been made to the policy names and numbers in this section of the Local Plan although there have been some changes to policy wording and these are addressed in the updated appraisal of likely effects described in this chapter.

12.3 A summary of the scores for these Policies is given in **Table 12.1** overleaf.

Table 8 Summary score for Local Plan Policies – Chapter 9: Achieving Accessibility for All

SA Topics	SA objectives	AC-S1	AC-S2	AC-D1	AC-D2	AC-S3	AC-D3	AC-D4	AC-S4	AC-D5	AC-D6	AC-D7
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.	+	+	++	+	+	+	0	0	0	0	0
Biodiversity and green infrastructure	2) To conserve and enhance biodiversity and to protect, conserve and enhance all habitats and species.	+	+	+	+	+	+	+	+	+	+	0
Climate change and adaptation to flood risk	3) To minimise and manage the risk of all forms of flooding.	0	+	+	0	0	0	0	0	0	0	0
	4) To minimise the impacts of climate change on Exmoor's communities and habitats.	0	+	+	0	0	0	0	0	0	0	0
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.	++	+	+	+	+	+	0	0	0	0	0
Community wellbeing	6) To promote and support thriving and inclusive communities, health and wellbeing.	+	+	+	+	+	+	+	+	+	0	0
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.	+	+/-	+	+	-	-	+	+	+	+	0
Historic environment	8) To maintain and enhance the quality of the built environment.	0	++	+	0	+	+	+	+	+	+	+
Housing	9) To help ensure that National Park communities have access to appropriate, good quality, sustainable, affordable housing.	+	+	+	+	0	+	0	0	0	0	0
Land	10) To promote sustainable forms of development and sustainable use of natural resources.	0	+	0	0	+	+	+	0	+	0	0
	11) To reduce all forms of waste production and promote reuse and recycling and minimise the risk of contaminated land.	0	0	0	0	0	0	0	0	0	0	0

SA Topics	SA objectives	AC-S1	AC-S2	AC-D1	AC-D2	AC-S3	AC-D3	AC-D4	AC-S4	AC-D5	AC-D6	AC-D7
Landscape	12) To protect, maintain and enhance the special qualities of the Exmoor National Park's landscape character.	0	++	+	0	+	+	+	+	++	+	++
Coast	13) To protect and/or enhance coastal areas.	0	+	+	0	+	0	0	+	0	+	0
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.	++	++	++	++	++	++	++	0	0	0	0

Overall Assessment of Chapter 9: Achieving Accessibility for All

- 12.4 The transport policies in this Chapter set out how Exmoor National Park Authority will work with Somerset and Devon County Councils as the Highways and Transport Authorities and transport providers to encourage sustainable transport for residents and visitors, supporting public and community transport services, accessibility, opportunities for walking, cycling and horse riding, and minimising emissions of greenhouse gas emissions. The policies set out the approach to transport infrastructure, transport and accessibility requirements for new development, traffic management and parking provision.
- 12.5 Chapter 9 also includes policies relating to improvements to the telecommunications network and electricity infrastructure, recognising the vital role that communications networks have for sustainable economic growth and the provision of community services and facilities. The policies seek to support improvements whilst ensuring that the conservation of the National Park's natural beauty, landscape, wildlife and cultural heritage is not compromised.
- 12.6 The policies are mainly very positive in relation to the SA objectives for Transport and 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 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 digital communications and connectivity 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.
- 12.7 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.
- 12.8 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 ICT 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.

12.9 The following sections set out the SA findings for each policy in more detail.

AC-S1: Sustainable Transport

- 12.10 AC-S1 sets out how the National Park Authority aims to encourage sustainable modes of transport, working with Highways and Transport Authorities, transport providers, local communities, and where appropriate, neighbouring authorities. It supports the provision of sustainable transport for residents and visitors, including public and community transport services, accessibility, opportunities for walking, cycling and horse riding and low carbon travel.
- 12.11 AC-S1 scored strongly positive for the SA topic of **Transport**, as would be expected as the policy is designed to support sustainable transport, and covers all the criteria in the SA framework. It also scored strongly positive for **Climate Change Mitigation and Energy**, with one of the stated purposes of the policy being to minimise emissions of greenhouse gases. The explanatory text recognises that transport is a significant contributor to greenhouse gas emissions, and links to Chapter 5: Responding to Climate Change and Managing Resources. It promotes alternatives to the car, including public transport and demand responsive transport, and encourages electric vehicles and low carbon travel. It also recognises the role of ICT in reducing the need to travel and supporting a low carbon future. While one of the criteria previously included in the policy in the 2013 Draft Local Plan has been removed (this related to improving information provision to make it easier for residents and visitors to travel without a car), overall the policy is still expected to have a strongly positive effect on the transport and climate change-related SA objectives.
- 12.12 AC-S1 scored positively in relation to **Air Quality and Water Resources**. One of the purposes of the policy is to minimise emissions of greenhouse gases, and the explanatory text recognises that transport is a significant contributor to greenhouse gas emissions, and links to Chapter 5: Responding to Climate Change. There is no specific reference to air quality, although transport and traffic levels in particular are identified in the baseline information (see **Appendix 1**) where it was concluded that air quality is generally good in the National Park, with relatively stable traffic levels, and it is not expected that air quality standards are likely to be generally exceeded.
- 12.13 Policy AC-S1 scored neutrally in relation to **Climate Change and Adaptation to Flood Risk**.
- 12.14 AC-S1 is positive for **Community and Wellbeing**, and **Economy and Employment**, recognising that the rural nature of the National Park and its dispersed population means that the majority of people rely on the private car to access jobs, services and facilities. There is support for public transport and alternative approaches such as demand responsive transport and car sharing clubs, but the policy does not require these or restrict development on the basis of transport availability, recognising the dependence on the private car (the supporting text and AC-S1). The supporting text also recognises the role of digital communication technology in reducing the need to travel and enabling more people to work from home or access information and services.
- 12.15 AC-S1 is also positive in relation to **Housing**. The supporting text refers to the spatial strategy (GP3) which recognises that new development should be focused in the named settlements to maintain their sustainability, self-sufficiency and resilience and should not lead to a severe increase in traffic.

- 12.16 AC-S1 was considered to be neutral in relation to the remaining SA topics of **Biodiversity and Green Infrastructure, Historic Environment, Land and Landscape**. Measures encouraged through this policy such as public transport provision (e.g. new bus stops), electric charging points or future resilience of transport infrastructure at risk from climate change could potentially have impacts on these assets, and would have to be tested against other policies in the Plan (GP1, CE-S1, CE-S3, CE-S4). However there is nothing specific in the policy that negatively impacts on them, hence the score is neutral. There could be cross-reference to the increased opportunities for walking etc. arising from enhanced green infrastructure (CE-S3) in the supporting text.
- 12.17 No specific implications are identified in relation to the **Coast**.

AC-S2: Transport Infrastructure

- 12.18 AC-S2 sets out the National Park Authority's approach to transport infrastructure. Although road maintenance and improvement schemes within existing highway boundaries do not require planning permission, consultation arrangements exist with the Highway Authorities to enable the National Park Authority's views to be heard before schemes are implemented. Many of Exmoor's roads, bridges and fords are historic and attractive features in their own right and other roadside features also add to the character of Exmoor's road network. AC-S2 seeks to ensure that any maintenance or improvement works are carried out to the highest environmental standards and in keeping with local character.
- 12.19 The policy scored strongly positive for **Transport** as it is intended to deliver transport outcomes for the National Park, and cover all the criteria in the SA framework. It also strongly positive for **Historic Environment and Landscape** as the importance of Exmoor's roads, historic bridges and fords as historic and attractive features in their own right is recognised, and the policy seeks to protect and enhance the rural character of roads. Highway maintenance or improvement works are expected to use materials and finishes appropriate to the built environment. Traditional street furniture and highways signage important to the character of the area should be retained, although highways signage can have an adverse impact on the landscape and streetscene.
- 12.20 The policy was considered to be positive in relation to **Air Quality and Water Resources**, and **Biodiversity and Green Infrastructure**. Road maintenance and improvement works could potentially have local impacts on wildlife or water quality if not carried out carefully. However the National Park Authority works with Highway Authorities to influence how works are carried out and to encourage the highest standards. AC-S2 seeks to avoid damage during maintenance or construction. AC-S2 seeks to minimise ecological disturbance and damage during maintenance and construction, as well as encouraging incorporation of wildlife enhancements where appropriate. While one criteria previously included in the policy has now been removed, in relation to maintaining and protecting biodiversity, the policy is still expected to be positive in relation to **Biodiversity and Green Infrastructure** overall as a result of the other criteria still included in the policy.
- 12.21 The policy was also considered to be positive in relation to **Climate Change Mitigation and Energy** as it encourages a shift in priority towards pedestrians, cyclists, horse riders and public transport.
- 12.22 The policy is positive for the themes of **Community and Wellbeing** and **Housing**. The concerns of local communities are reflected in relation to road safety issues,

particularly for non-motorised modes of transport. The shift in priority towards pedestrians and non-car modes of travel and improved foot and cycle paths will support health and wellbeing. New roads are generally not considered to be appropriate within the National Park, although an exception is made where they would result in substantial community benefit.

- 12.23 The policy is positive in relation to **Land**, as it focuses on road maintenance and improvement schemes on existing roads, and new roads will not be permitted except where they would result in substantial environmental gain or community benefit. This requirement will reduce demand for land take for road infrastructure.
- 12.24 There are both positive and negative implications in relation to **Economy and Employment**. On the positive side, the policy encourages travel by modes other than the car by prioritising road safety interests for non-car based modes of transport in particular. However, upgrading roads to increase speed and developing new roads will not generally be permitted which could constrain economic opportunities.
- 12.25 The policy was given a positive score for **Climate Change and Adaptation to Flood Risk** as it encourages the use of sustainable drainage systems (SuDS) to increase the resilience of transport infrastructure at risk from extreme weather events.

AC-D1: Transport and Accessibility Requirements for Development

- 12.26 Policy AC-D1 sets out the transport and accessibility requirements for development. Applications should be located, designed and planned to create attractive environments, avoid community severance and encourage a shift of priority towards pedestrians, cyclists, horse riders and public transport. Transport and Air Quality Assessments are required where proposals are likely to generate severe levels of traffic, accompanied by a Travel Plan to ensure that the proposal delivers sustainable travel outcomes.
- 12.27 The policy scored strongly positive for **Transport** as it is intended to deliver transport outcomes for the National Park, and cover all the criteria in the SA framework. The policy was also positive for **Historic Environment** and **Landscape** as highway maintenance or improvement works are expected to use materials and finishes appropriate in scale and which contribute to the conservation or enhancement of the area. Transport Assessments will be used to determine whether the impact of proposals likely to generate severe levels of traffic on the special qualities (including landscape and cultural heritage) is acceptable.
- 12.28 The policy was considered to be positive in relation to **Biodiversity and Green Infrastructure** and strongly positive in relation to **Air Quality and Water Resources**. AC-D1 supports walking, cycling, low carbon travel and car sharing which will reduce greenhouse gas emissions. The explanatory text requires proposals to not exceed the local road capacity or cause an unacceptable deterioration in air quality. Air Quality Assessments are required where developments are likely to generate severe levels of traffic to consider in more detail impacts on air quality and any mitigation needed. Preserving air quality will also have indirect positive effects on biodiversity. Policy AC-D1 also requires the proposals for highways works contribute to the conservation or enhancement of the area although specific reference is not made to biodiversity enhancement.

- 12.29 The policy was also considered to be positive in relation to **Climate Change Mitigation and Energy** as it encourages a shift in priority towards pedestrians, cyclists, horse riders and public transport and also support opportunities for low carbon travel including installation of electric charging points. Transport Assessments and Travel Plans will be required if proposals are likely to generate significant levels of transport. These will seek to identify measures to support sustainable transport including minimising the level of trips generated and how accessibility to the site by different transport modes will be achieved. These assessments will be used to determine whether the impact of the development is acceptable.
- 12.30 The policies are positive for **Community and Wellbeing** and **Housing**. The shift in priority towards pedestrians and non-car modes of travel and improved foot and cycle paths will support health and wellbeing and there is support for car club and car sharing facilities which could help reduce isolation particularly for those without access to their own car. New development is required to avoid community severance and ensure good access to nearby services and facilities, and proposals which will cause unacceptable levels of traffic or prejudice road safety will not be permitted.
- 12.31 The policy is neutral in relation to **Land**.
- 12.32 The policy is positive in relation to **Economy and Employment** as it will improve sustainable transport links and encourage car share clubs which may enable more people to access a wider range of employment opportunities.
- 12.33 The policy was given a neutral score for **Climate Change and Adaptation to Flood Risk** and the **Coast** as they do not directly relate to these issues.

AC-D2: Traffic and Road Safety Considerations for Development

- 12.34 Policy AC-D2 is a brief policy which refers specifically to traffic and road safety. It requires the Exmoor Route Network to be taken into consideration in the determination of development proposals and will not permit development that would cause unacceptable levels of traffic or that would prejudice road safety.
- 12.35 Because the policy is quite specific, neutral affects are identified for several of the SA themes including **Climate Change and Adaptation to Flood Risk, Historic Environment, Land, Landscape and Coast**.
- 12.36 The policy is strongly positive in relation to **Transport** as its primary purpose is to ease traffic congestion and encourage the use of sustainable transport.
- 12.37 The policy is positive in relation to **Air Quality and Water Resources** as it does not permit development that would cause unacceptable levels of traffic in terms of the environmental or physical capacity of the road network – this should help to avoid pockets of congestion which can lead to poor air quality. This in turn would have a positive effect on biodiversity, so the policy is positive in relation to theme of **Biodiversity and Green Infrastructure**.
- 12.38 The measures in the policy to avoid unacceptable levels of traffic being generated by new development also mean that the policy is positive in relation to the theme of **Climate Change Mitigation and Energy**.
- 12.39 The policy is likely to benefit health by preventing new development from resulting in pockets of poor air quality caused by congestion. The measures in the policy to improve road safety will also benefit health and wellbeing for local people and

visitors. Therefore, the policy is positive in relation to the theme of **Community Wellbeing**.

- 12.40 There are both positive and negative effects on **Economy and Employment** as, although the policy could restrict economic growth by preventing development where it would result in high levels of traffic generation, the requirements of the policy could mean that employment-related development proposals are more likely to incorporate measures to encourage the use of sustainable transport by employees which would contribute to the development of a sustainable economy. Similarly, housing development could also be restricted but it may be more likely to incorporate sustainable transport measures in order to reduce traffic generation, so mixed effects on the theme of **Housing** are also likely.

AC-S3: Traffic Management and Parking

- 12.41 Policy AC-S3 sets out the National Park Authority's approach to traffic management and parking, seeking to take into account the needs of all road users and encourage modal shift while still providing for community needs.
- 12.42 The policy was considered to be strongly positive in relation to the SA topic of **Transport**. It seeks to meet the needs of all users, including pedestrians, cyclists, horse riders and disabled people, and to identify local solutions to parking and congestion problems. The Exmoor Route Network aims to ensure that traffic uses the roads most suited to the purposes of its journey. AC-S3 provides for temporary parking measures to accommodate peak parking demand where necessary and appropriate.
- 12.43 Policy AC-S3 scored positively for **Air Quality and Water Resources**. Although there is no specific reference to air quality, the measures to manage traffic will benefit air quality. Similarly, the policy scored positively for **Climate Change Mitigation and Energy** as the measures to reduce car traffic and support the needs of other road users will reduce greenhouse gas emissions.
- 12.44 The policy was also considered to be positive for **Community and Wellbeing**. The policy promotes innovative approaches including shared surfaces and enhancing the street scene, as well as safer crossing points. The National Park Authority will seek to ensure that the needs of more vulnerable road users are taken account of in traffic management. The approach to parking is to provide for community needs rather than peak parking, with temporary solutions being sought where necessary and appropriate.
- 12.45 The policy scored positively for **Historic Environment and Landscape**. There is a presumption against providing for peak parking demand due to the impact on the environment and the supporting text reflects that there may be scope for rationalising, relocating or redesigning existing parking where this would achieve environmental gains, which could include landscape improvements. Extensions to existing car parks or minor new facilities will be subject to conservation objectives and a design led approach to parking provision is promoted, that is well integrated with a high quality public realm. Temporary solutions will be sought for peak parking where this is causing damage – this should specify environmental damage. Local solutions to parking issues can be sought, in keeping with landscape character. The approach to parking provision is to minimise parking required, taking into account environmental constraints which would include landscape constraints.
- 12.46 The policy is neutral for **Housing** as it does not directly relate to that SA theme.

- 12.47 The policy was considered to be positive for **Land**. The approach to parking provision has taken into account the need to reduce land take given the limited capacity of suitable developable land within the National Park. This includes the presumption against providing for peak parking, and the use of temporary solutions.
- 12.48 The policy scored negatively for **Economy and Employment**. 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. However, AC-S3 seeks to provide for community needs rather than peak parking which will reduce potential custom for local businesses, although temporary solutions can be sought. Similarly, small car parks could be reserved for communities which would restrict available parking for local businesses.
- 12.49 The policy was given a positive score in relation to **Biodiversity and Green Infrastructure**. There is a presumption in AC-S3 against providing for peak parking demand due to the impact on the environment which is taken to include biodiversity. Walking and cycling are encouraged by the measures to meet the needs of all road users, which could also support networks of Green Infrastructure.
- 12.50 The policy was given a neutral score in relation to **Climate Change and Adaptation to Flood Risk**.
- 12.51 The policy was positive in relation to the **Coast** as it now includes a criterion specifically relating to car parks that are vulnerable to climate change including from coastal change.

AC-D3: Parking Provision and Standards

- 12.52 Policy AC-D3 sets out the National Park Authority's approach to parking provision and standards, requiring development proposals to make appropriate provision for cycle and car parking, including for disabled users, in line with the specified standards.
- 12.53 The policy was considered to be strongly positive in relation to the SA topic of **Transport**. The policy seeks to meet the needs of all users, including cyclists and disabled users, and to ensure that development incorporates an appropriate level of car parking taking into account local variations in the provision of sustainable transport links.
- 12.54 Policy AC-D3 scored positively for **Air Quality and Water Resources**. Although there is no specific reference to air quality, the measures to encourage sustainable transport use through the provision of cycle parking and lower levels of car parking where there are good sustainable transport links will reduce traffic and therefore benefit air quality. For the same reason the policy also scored positively for **Climate Change Mitigation and Energy**.
- 12.55 The policy was also considered to be positive for **Community and Wellbeing**. Cycle parking provision is encouraged, which may lead to health benefits associated with more people cycling. There is also specific provision for disabled people in the policy.
- 12.56 The policy specifies that parking provision should be well designed and integrated with a high quality environment; therefore the policy scored positively for **Historic Environment and Landscape**. The approach to parking provision is to minimise parking required, taking into account environmental constraints which would include

landscape constraints. A positive effect on **Biodiversity and Green Infrastructure** is also identified, due to the measures to take into account environmental constraints.

- 12.57 The policy was positive for **Housing**. The policy approach reflects the importance of parking provision on Exmoor due to the high dependency on the car, coupled with the need to balance this with the special qualities of the National Park. The supporting text explains the approach to parking provision, with the principle being to minimise parking, taking into account environment constraints and guided by the standards in the table. Where developments are in locations that are well served by public transport or have good walking and cycling links, lower levels of car parking provision may be appropriate. There may also be circumstances where no parking is provided, taking into account the proximity of public parking including on-road parking, to enable an otherwise acceptable development to go ahead. The approach outlined in the policy is intended to enable affordable housing to be provided, with adequate parking.
- 12.58 The policy was also considered to be positive for **Land**. The approach to parking provision has taken into account the need to reduce land take given the limited capacity of suitable developable land within the National Park. The design of parking provision in development should also avoid 'land hungry approaches'. The exception to this is provision for people with disabilities, which would need to be in accordance with the Regulations. Proposals for a higher level of car parking provision as set out in Table 9.1 will need to be supported with robust evidence.
- 12.59 The policy scored negatively for **Economy and Employment**. Exmoor is disadvantaged economically as it has no strategic road or rail corridors, which can hinder economic opportunities. Limiting car parking in economic developments, in line with the standards set out in Table 9.1, could therefore hinder economic activities, although the standards (which are based on Somerset County Council parking standards for rural areas) do reflect the fact that more people use private modes of transport in rural areas.
- 12.60 The policy was given a neutral score in relation to **Climate Change and Adaptation to Flood Risk** and the **Coast**.

AC-D4: Temporary Parking

- 12.61 Policy AC-D4 set out the National Park Authority's approach to temporary parking, permitting temporary overflow measures only in certain circumstances, where the shortfall in parking is causing adverse impacts.
- 12.62 The policy was considered to be strongly positive in relation to the SA topic of **Transport** as it allows temporary parking measures to accommodate peak parking demand where there are no adverse impacts on the environment or amenity of local communities.
- 12.63 The specific nature of the policy means that is scored neutrally for a number of the SA topics including **Air Quality and Water Resources, Climate Change Mitigation and Energy** and **Housing**.
- 12.64 The policy was considered to be positive for **Community and Wellbeing** as temporary parking would be permitted where there would be no adverse impact on local communities.

- 12.65 The policy also scored positively for **Historic Environment** and **Landscape**. Temporary solutions will be sought for peak parking where there are no adverse impacts to the environment and character of the area.
- 12.66 The policy was also considered to be positive for **Land**. While the supporting text notes that most temporary parking sites will be on greenfield land, it specifies that any grassed surfaces will need to be retained and conserved using reinforced mesh to protect soil structure. The use of brownfield land for temporary parking may also be allowed if this leads to enhancement in accordance with GP1 and CE-S6.
- 12.67 The policy scored positively for **Economy and Employment** as it permits temporary parking provision in certain circumstances, which would help to meet demand during peak tourism periods which will support local businesses.
- 12.68 The policy was given a positive score in relation to **Biodiversity and Green Infrastructure**. Policy AC-D4 allows for temporary parking measures and although these are primarily likely to be on greenfield land, it is specified that grassed surfaces should be retained and conserved using reinforced mesh to protect the vegetation and soil structure.
- 12.69 The policy was given a neutral score in relation to **Climate Change and Adaptation to Flood Risk** and the **Coast**.

AC-S4: Electricity and Communications Networks

- 12.70 This policy sets out the National park Authority's approach to development associated with improving electricity and telecommunications networks.
- 12.71 The policy scored positive for **Community and Wellbeing** and **Economy and Employment**. The purpose of the policy is to underpin the vitality and viability of Exmoor's communities and businesses by encouraging development that improves the accessibility and standard of the electricity and telecommunications networks and the link between this and thriving communities and businesses is recognised. The importance of ICT, electricity and telephone services for communities and businesses, particularly in rural areas, is reflected in the supporting text. The policy states that great weight will be given to conserving and enhancing the special qualities of the National Park – this would indirectly support the economy through maintaining the natural beauty and visual amenity of the National Park which is an important draw for tourism.
- 12.72 The policy also scored strongly positive for **Landscape** as the policy approach is to support improvements to the telecommunications and electricity infrastructure network, whilst ensuring that the conservation of the National Park's special qualities (including landscape) are not compromised. For the same reason, the policy is positive for the **Historic Environment** as adverse effects on the setting of heritage features from infrastructure should be avoided, and specific reference is made to avoiding adverse impacts on cultural heritage. The policy also states that major and nationally significant transmission infrastructure proposals will be considered in accordance with policy GP2: Major Development.
- 12.73 The policy was also positive for **Biodiversity and Green Infrastructure** as it specifies that proposals will be supported where there are not unacceptable adverse impacts on biodiversity.
- 12.74 The policy scored neutral for **Land**.

- 12.75 The policies scored positively for the **Coast**, as this is an important part of Exmoor's landscape character, and any impacts on this would be covered by the protection of natural beauty and landscape provided for in the policy. The disruptive impact of transmission lines and poles on the landscape is identified and the grid connections from nationally significant offshore renewable energy schemes will be resisted as the landfall would cause unacceptable damage to the natural environment including seascape.
- 12.76 The policy was neutral for **Air Quality and Water Resources, Climate Change Mitigation and Energy**, and **Transport** as well as **Climate Change and Adaptation to Flood Risk and Housing**.

AC-D5: Radio and Mobile Telecommunications Infrastructure

- 12.77 The policy scored strongly positive in relation to **Landscape** as the primary aim of the policy is to avoid adverse impacts on the landscape and visual amenity as a result of radio and mobile telecommunications infrastructure. Indirect positive effects on the **Historic Environment** are therefore also likely as the policy will protect the setting of heritage assets and the policy ensures there will be no unacceptable adverse impacts on the historic environment.
- 12.78 The policy also scores positive for **Community and Wellbeing** as it seeks to protect the amenity of residents and visitors. It is also positive for **Economy and Employment** as the policy will indirectly support the economy through maintaining the natural beauty and visual amenity of the National Park which is an important draw for tourism. Improvements to telecommunications infrastructure where appropriate will also support the local economy.
- 12.79 The policy also scored positively for **Land** as it supports the sharing of telecommunications infrastructures including consolidation of existing infrastructure, which will reduce land take.
- 12.80 A positive effect is also given for **Biodiversity and Green Infrastructure** as the policy states that radio and mobile telecommunications proposals should have no unacceptable impact on sensitive habitats and wildlife.
- 12.81 The specific nature of the policy means that neutral effects were identified for the remaining SA themes including **Transport, Air Quality and Water Resources, Climate Change and Adaptation to Flood Risk, Climate Change Mitigation and Energy, Housing and Coast**.

AC-D6: Fixed Line Transmission Infrastructure

- 12.82 The policy scores positive for **Landscape, Coast and Historic Environment** as it firstly encourages new transmission lines to be routed underground or the consideration of alternative means of providing the service with minimal environmental impacts. Failing this, overhead lines will only be permitted where the visual impacts will be minimised. This will help to protect the setting of heritage assets as well as the wider landscape and seascape character.
- 12.83 The policy scored positive for **Biodiversity and Green Infrastructure** as proposals for new transmission lines must not conflict with policies relating to biodiversity and green infrastructure, and proposals for cabling for renewable energy will only be permitted where it would not adversely affect biodiversity.
- 12.84 AC-D6 is also positive for **Economy and Employment** as the policy will indirectly support the economy through maintaining the natural beauty and visual amenity of

the National Park which is an important draw for tourism. Improvements to telecommunications infrastructure where appropriate will also support the local economy.

- 12.85 The specific nature of the policy means that neutral effects were identified for the remaining SA themes including **Transport, Air Quality and Water Resources, Climate Change and Adaptation to Flood Risk, Climate Change Mitigation and Energy, Community and Wellbeing and Housing.**

AC-D7: Satellite Antennae

- 12.86 AC-D7 is a very specific policy, which aims to avoid satellite antennae having adverse visual impacts.
- 12.87 The policy is strongly positive for **Landscape** as its primary purpose is to restrict satellite antennae or wireless broadband equipment where it would be site obtrusively. The policy is also positive for **Historic Environment** as it does not permit harm to the historic or architectural interest of buildings or the streetscene.
- 12.88 The specific nature of the policy means that neutral effects were identified for the remaining SA themes including **Transport, Air Quality and Water Resources, Biodiversity and Green Infrastructure, Climate Change and Adaptation to Flood Risk, Climate Change Mitigation and Energy, Community and Wellbeing, Economy and Employment, Housing, Land and Coast.**

Recommendations

- 12.89 The following recommendation was made in relation to the policies for Achieving Accessibility for All in a draft version of the 2015 SA report:

AC-S1: Sustainable Transport

- It was 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. *This recommendation was addressed in the final version of the Publication Draft Local Plan (2015).*

13 Appraisal of Publication Draft Local Plan Policies – Chapter 10: Exmoor’s Settlements including Proposed Main Modifications

- 13.1 This section of the Local Plan sets out information that applies to defined settlements within the National Park. For each settlement there is an inset map and written statement, which outlines the key aspects of each settlement in relation to its setting, built environment and local services.
- 13.2 Taking the Proposed Main Modifications into account, there would be three policies in this part of the Local Plan:
- ES-S1: Supporting Local Communities
 - ES-D1: Wheddon Cross and Cutcombe Community Safeguarding Area
 - ES-D2: Dulverton Community Safeguarding Area
- 13.3 ES-S1 is an enabling policy and does not have specific implications that can be assessed against the SA objectives. It sets out that the National Park Authority will work with local communities where they have identified priorities and plans for development, for example through parish plans or Neighbourhood Plans. Such plans themselves would need to be considered in relation to SA requirements.
- 13.4 ES-D1: Wheddon Cross and Cutcombe Community Safeguarding Area identifies an area that will be safeguarded for an extension to the school site and school playing field. Similarly, ES-D2: Dulverton Community Safeguarding Area identifies an area that will be safeguarded for an extension to the existing cemetery. **Table 13.1** below presents an appraisal of those policies, which could result in those proposals coming forward at a later stage. An appraisal of the settlements has been carried out along with the spatial strategy (GP3) (see **Chapter 6** above).
- 13.5 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.

Table13.1 Summary score for Local Plan Policies – Chapter 10: Exmoor’s Settlements

SA Topics	SA Objectives	ES-D1	ES-D2
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.	+/-	0
Biodiversity and green infrastructure	2) To conserve and enhance biodiversity and to protect, conserve and enhance all habitats and species.	0	0
Climate change and adaptation to flood risk	3) To minimise and manage the risk of all forms of flooding.	0	0
	4) To minimise the impacts of climate change on Exmoor’s communities and habitats.	0	0
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.	+/-	0
Community wellbeing	6) To promote and support thriving and inclusive communities, health and wellbeing.	+	+
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.	0	0
Historic environment	8) To maintain and enhance the quality of the built environment.	0	0
Housing	9) To help ensure that National Park communities have access to appropriate, good quality, sustainable, affordable housing.	-	-
Land	10) To promote sustainable forms of development and sustainable use of natural resources.	0	0
	11) To reduce all forms of waste production and promote reuse and recycling and minimise the risk of contaminated land.	0	0
Landscape	12) To protect, maintain and enhance the special qualities of the Exmoor National Park’s landscape character.	0	0
Coast	13) To protect and/or enhance coastal areas.	0	0
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.	+/-	0

ES: D1: Wheddon Cross and Cutcombe Community Safeguarding Area

- 13.6 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.

- 13.7 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.
- 13.8 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 neutral for these SA themes.
- 13.9 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.
- 13.10 Effects on the other SA themes would also be neutral.

ES-D2: Dulverton Community Safeguarding Area

- 13.11 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.
- 13.12 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.

Recommendations

- 13.13 The following recommendation was made in relation to the chapter relating to Exmoor's settlements in an early draft of the 2015 SA Report:
- As noted in Chapter 6 in relation to the settlement appraisal, it was recommended that the relevant settlement descriptions in Chapter 10 of the Local Plan make reference to European designated sites that are in close proximity. *This recommendation was addressed in the final version of the Publication Draft Local Plan (2015).*

14 Appraisal of Publication Draft Local Plan Policies – Chapter 11: Monitoring and Implementation including Proposed Main Modifications

- 14.1 This section of the Local Plan sets out the way in which it will be implemented and monitored over the period 2011-2031 and includes a proposed monitoring framework which will be used to monitor the impact of policies within each section of the Local Plan.
- 14.2 Following examination of the Publication Version of the Local Plan, a new policy (MI-S1 Monitoring and Review of Affordable Housing Need and Provision) has been introduced to this section as well as a reasoned justification for its inclusion in the form of supporting text.
- 14.3 It is recognised that particular attention needs to be paid to monitoring the indicative need for affordable housing within the National Park (projected to be 238 homes up to 2031¹⁷) and the number permitted each year in order to reflect the aim of the Plan to provide affordable housing to meet local need.
- 14.4 Policy MI-S1 sets out the indicators that will be used to determine whether affordable housing need is being met and the process for determining whether a review of the Plan may be needed.
- 14.5 **Table 14.1** below presents an appraisal of this policy.

Table 14.1 Summary score for Local Plan Policies – Chapter 11: Monitoring and Implementation

SA Topics	SA Objectives	MI-S1
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.	0
Biodiversity and green infrastructure	2) To conserve and enhance biodiversity and to protect, conserve and enhance all habitats and species.	0
Climate change and adaptation to flood risk	3) To minimise and manage the risk of all forms of flooding.	0
	4) To minimise the impacts of climate change on Exmoor's communities and habitats.	0
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.	0
Community wellbeing	6) To promote and support thriving and inclusive communities, health and wellbeing.	+

¹⁷ This figure has been taken from the 2016 Schedule of Proposed Changes to Section 6 of the Local Plan (see Appendix 5).

SA Topics	SA Objectives	MI-S1
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.	0
Historic environment	8) To maintain and enhance the quality of the built environment.	0
Housing	9) To help ensure that National Park communities have access to appropriate, good quality, sustainable, affordable housing.	++
Land	10) To promote sustainable forms of development and sustainable use of natural resources.	0
	11) To reduce all forms of waste production and promote reuse and recycling and minimise the risk of contaminated land.	0
Landscape	12) To protect, maintain and enhance the special qualities of the Exmoor National Park's landscape character.	0
Coast	13) To protect and/or enhance coastal areas.	0
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.	0

MI-S1 Monitoring and Review of Affordable Housing Need and Provision

- 14.1 The policy is strongly positive in relation to **Housing** as it sets out the circumstances that will trigger a review of the plan to ensure that the indicative level of need for affordable housing is provided to meet local needs. The policy states that the Council will complete a review of the affordable housing need figure no later than December 2020 and at intervals of no more than 5 years thereafter. The circumstances that will trigger a review of the Local Plan to increase local affordable housing provision will be whether there has been an increase of more than 20% in the indicative affordable housing need figure compared with the figure in paragraph 6.31 of the Plan (238), or if in any continuous three-year monitoring period the total number of affordable dwellings permitted in those three years is less than 10% of the indicative affordable housing need figure above; in the latter case, a review of the reasons for this will be carried out unless cumulative delivery and up to date evidence of need evidence indicates otherwise. As such, a positive effect is also likely in relation to **Community Wellbeing** given that this approach will help to meet people's housing needs. Given the narrow focus of the policy, neutral effects have been given for all other SA objectives.

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

- 15.1 An overall assessment of all the policies in the Publication Draft Local Plan (including the Proposed Main Modifications) against each SA topic is given below.

Air Quality and Water Resources

- 15.2 Overall the impacts of the Publication Draft Local Plan 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, although in some popular tourism destinations there are potential issues for air quality arising from pollution from traffic and congestion during the peak holiday periods. Safeguards are in place through policies such as CC-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

- 15.3 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 Publication Draft Local Plan is generally **very positive** for biodiversity, geodiversity and green infrastructure, particularly the General Policies which apply to all development. There are also specific policies that protect wildlife and habitats, and encourage enhancements such as the provision of habitats and wildlife friendly measures in developments including bat or bird boxes (CE-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 wildlife protected areas, and development could be constrained in these areas as a result. A separate Habitats Regulation Assessment has been undertaken to consider the implications of the Publication Draft Local Plan for internationally important habitats.

Climate Change and Adaptation to Flood Risk

- 15.4 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.
- 15.5 Overall the Publication Draft Local Plan 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. 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

- 15.6 The Publication Draft Local Plan is **mainly positive or neutral** in relation to climate change mitigation and energy, although there are some mixed or unknown potential effects. Future changes in climate are likely to affect all aspects of the National Park – its natural beauty, wildlife and cultural heritage, the special qualities that people visit to enjoy and understand, and effects on local communities and economic activity. The main sources of emissions of greenhouse gases on Exmoor related to development are from energy and transport, principally arising from the burning of fossil fuels for domestic heating, commercial sectors and vehicle movements. 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 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

- 15.7 The Publication Draft Local Plan is **very positive** for the local community, supporting affordable housing for local people, employment opportunities, community services and facilities, and a high quality natural and built environment. Whilst overall levels of development will not be high, the Local Plan introduces additional flexibility for development to help maintain thriving communities, for example through the provision of affordable housing including specialist housing and extended family dwellings. Policies to support open spaces and access to recreation will help encourage healthy lifestyles, and protecting the tranquillity of the National Park will also contribute to wellbeing. The settlement strategy includes a wide range of settlements to enable communities to meet their needs and also where possible to support the maintenance of services and facilities. 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

- 15.8 The Publication Draft Local Plan is **positive** for the economy and employment as it seeks to encourage development which will help strengthen and diversify the Exmoor economy and sustain the high quality environment of the National Park. 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

- 15.9 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 Publication Draft Local Plan is generally **very positive** for cultural heritage and the historic environment, particularly the General Policies which apply to all development. There are also specific policies to conserve and enhance cultural heritage and the historic environment (CE-S4 Cultural Heritage and Historic Environment, CE-D3 Conserving Heritage Assets), including measures to bring heritage assets that are redundant or at risk back into viable use, providing this is consistent with their conservation. 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

- 15.10 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 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

- 15.11 This SA topic covers two SA objectives – promote sustainable development and the sustainable use of natural resources, and 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.
- 15.12 The Publication Draft Local Plan is **generally positive** in relation to land. One of the key considerations has been the limited capacity for development due to constraints of topography, landscape and so on and therefore the approach taken is to ensure that the best use is made of the limited supply of suitable land. The only exception to this is principal residence housing, where an element of market housing is allowed 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

- 15.13 Exmoor was designated for its natural beauty and the conservation and enhancement of landscape quality is fundamental element of the Publication Draft Local Plan. The policies are **generally very positive** for landscape, particularly the General Policies which apply to all development. There are also specific policies that protect landscape character and tranquillity, particularly Exmoor's dark night sky as the National Park is designated a Dark Sky Reserve (CE-S1 Landscape 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 Study¹⁸. The settlements identified have some capacity for development, but in some cases this may be limited to only affordable housing to meet the parish's own needs due to landscape sensitivity. The policy approach of promoting the reuse of existing buildings will also help to minimise visual impacts and detrimental changes to landscape character.

Coast

- 15.14 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 Publication Draft Local Plan is **positive** in relation to protecting and enhancing coastal areas. The Heritage Coast is identified in policy CE-D1 and policy 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,

¹⁸ Landscape Sensitivity Study (2011) Paul Bryan for Exmoor National Park Authority

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

- 15.15 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 Publication Draft Plan seeks to encourage sustainable transport and reduce the need to travel through specific policies (AC-S1 Sustainable Transport, AC-S3 Traffic Management and Parking) and also the spatial strategy (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.
- 15.16 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

- 15.17 As well as identifying individual effects of the Publication Draft Local Plan against the SA objectives an important part of the SA process is to assess how individual effects interact with one another to identify whether there are any cumulative effects that may result from implementation of different policies in the Plan. Consideration of the significance of potential impacts also takes into account cumulative effects of the Plan in combination with other plans or programmes.
- 15.18 The combined effects of the policies and spatial strategy (GP3) are likely to result in a beneficial effect on the protection of the landscape, wildlife, cultural heritage and land. The cumulative impact of development could erode the character of on the landscape and historic environment but policies in the Publication Draft Local Plan will ensure that a robust approach is taken to their protection, and that enhancement is achieved where possible. The Landscape Sensitivity Study has also ensured that there is some capacity for development in all the named settlements identified in the spatial strategy. The focus on re-use of existing buildings and the provision of affordable (rather than market) housing will also reduce land-take.
- 15.19 Policies on Tourism, Recreation, Green Infrastructure, and Community Facilities are likely to work in conjunction with each other to produce a cumulative beneficial effect

on the provision and access to public open space, and will also encourage healthy lifestyles and community wellbeing. There may be cumulative impacts arising from more intensive recreation and tourism use or larger scale developments. For example, large scale proposals could generate significant levels of traffic, which potentially would lead to increased greenhouse gas emissions. However, the policy guards against cumulative impacts and requires that the location, scale and intensity of use is appropriate in relation to environmental capacity.

- 15.20 It is anticipated that there will not be any significant cumulative effects on air quality, water resources, carbon emissions, the coast, or transport.

Recommendations

- 15.21 A small number of recommendations for the Local Plan policies and supporting text were set out in the preceding chapters. These recommendations, which were made in relation to a draft version of the Publication Draft Local Plan in 2015, are set out in **Table 14.1** below along with a summary of how they were addressed in the final version of the Publication Draft Local Plan (as submitted for examination).
- 15.22 **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 influenced the Publication Draft Local Plan (2015)

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 policy now refers to climate change mitigation and adaptation with particular reference to flood risk.

Recommendations	How recommendation was addressed in the Publication Draft Local Plan (2015)
the need to avoid development of this nature in areas of high flood risk, as well as other considerations relating to climate change adaptation.	
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 recreational development and the potential benefits for the local community are recognised in the supporting text to the policy.	The supporting text to the policy now recognises these benefits.
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.

Consideration of Alternatives

- 15.23 The SEA Directive requires assessment of the likely significant effects of implementing the plan, and “reasonable alternatives”. Developing options or alternatives is an important part of both the plan-making and Sustainability Appraisal process. For the Local Plan, different options were put forward during the preparation of the plan. This included options for how affordable housing could be

delivered, and options for where new development should go. These options were appraised and subject to consultation in 2011¹⁹.

- 15.24 The preferred option that was initially taken forward in the Local Plan was to allow new development (provided a number of criteria are met) in all settlements listed in the existing Local Plan plus a number of additional settlements identified through consultation. This was shown to be the most positive option in relation to community wellbeing, the economy and the overall provision of affordable housing, although there could be impacts on landscape due to the sensitivity of some settlements to change, and climate change mitigation and transport due the dispersed settlement pattern and potential additional travel movements. These potential negative impacts have been examined in more detail in relation to the settlement strategy and, although no specific site allocations or housing targets have been set, any proposals that do come forward will have to ensure negative impacts are avoided or mitigated, in accordance with policies in the Plan.
- 15.25 Since the Draft version of the Local Plan in 2013, the 'Rural Communities' tier of settlements has been removed from the spatial strategy in response to changes to Government policy in relation to Section 106 thresholds for affordable housing. However, the policy approach remains the same in that opportunities for local affordable self-build housing are still provided for in small rural communities within the open countryside – this is explained in the text preceding GP3 and in policy HC-D5 Custom/Self Build Local Need Housing in Rural Communities. Therefore, the overall strategy achieves the same outcomes as proposed in the Draft Local Plan.
- 15.26 The option that has been taken forward for the delivery of housing is to focus on the provision of affordable housing, but in some circumstances to allow market housing to cross-subsidise this. There is also allowance for accessible and adaptable housing to address an identified local need to care for older people and other vulnerable members of the community, including for those who have a local connection. There will be both positive and negative impacts of this approach to housing provision in sustainability terms. The focus on providing affordable housing will be positive for local communities and also local businesses who need local workers. The use of market housing (with a principal residence tie) to cross-subsidise this is a pragmatic approach given reductions in public funding for affordable housing, but it could lead to the limited stock of suitable land being used up more quickly. There is no provision for housing solely to meet open market demand as this is likely to have substantial negative impacts due to the levels of likely demand and landscape sensitivity of the National Park.
- 15.27 The options considered for each policy area were assessed as part of the Your Future Exmoor issues and options consultation, to give an indication of which options are more favourable in sustainability terms. For many topic areas there are no reasonable alternatives as the policy approach is set out at the national level in the NPPF. The SA has been an iterative process. During the preparation of the 2013 SA Report for the Draft Local Plan, the policies were subject to an initial assessment as they were drafted and recommendations were made to improve their sustainability effects. This process was documented in detail in the October 2013 SA Report. The changes that were made to the policies in the Publication Draft Local Plan were mainly fairly minor changes to the wording of policies, although a

¹⁹ Sustainability Appraisal Report – Local Plan Vision, Objectives, General Policies and Options, (2011) prepared by Clare Reid Consultancy for Exmoor National Park Authority

small number of policies were deleted or added, as described in the preceding chapters.

Monitoring

- 15.28 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 set out in the SA framework (see **Appendix 3**).

Mitigation Measures

- 15.29 A relatively small number of negative effects have been identified through the SA of the Publication Draft Local Plan including the Proposed Main Modifications, and many of these 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 14.2** 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 change mitigation and energy	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.	CC-S1 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

SA topic	SA objectives	Local Plan policies providing potential mitigation
		Buildings SE-S4 Agricultural 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 Exmoor.	AC-S1 Sustainable Transport AC-S2 Transport Infrastructure

Appendix 1
Updated Baseline Information

- 1.1. Exmoor was designated as a National Park in 1954²⁰, and covers an area of 692.8km², 491.9km² of which is within the historic county of Somerset, and 200.9km² of which is within the historic county of Devon²¹. The three largest settlements are Porlock, Dulverton and Lynton & Lynmouth.

Air Quality and Water Resources

Air Quality

- 1.2. There are no air quality management areas (AQMA) within the National Park area, and air quality is generally thought to be good. The nearest AQMAs are to the west in Braunton, to the south in Crediton, Cullompton and Exeter, and to the east in Taunton and Henlade²².
- 1.3. Some Exmoor habitats are sensitive to acidification with critical load exceedences that can arise from relatively low levels of some pollutants (oxides of sulphur and nitrogen) which cause acid rain. Critical loads are the maximum amount of pollutants that ecosystems can tolerate without being damaged.
- 1.4. The Exmoor Heaths Special Area of Conservation (SAC) is particularly vulnerable to increased acid deposition. The following habitats at this SAC are in exceedence of the relevant nitrogen critical loads: blanket bogs, old sessile oak woods with *Ilex* and *Blechnum*, northern Atlantic wet heaths with *Erica tetralix*. The habitats in exceedence of nitrogen critical loads at Exmoor and Quantock Oakwoods SAC are as follows: old sessile oak woods with *Ilex* and *Blechnum* and broadleaved deciduous woodland (habitat for Barbastelle and Bechstein's bats in this SAC).
- 1.5. In West Somerset, CO₂ emissions mainly arise from industry and commerce (34%), domestic sources (32%) and road transport (32%)²³. Per capita emissions of CO₂ in West Somerset are 9.9 tCO₂ and in North Devon are 6.3 tCO₂ compared to 5.8 tCO₂ for the south west region and 6.0 tCO₂ for England as a whole²⁴.
- 1.6. Traffic levels within the National Park increase through the main visitor period leading to increased traffic pollution during the summer months. The Annual Average Daily Traffic (AADT) count for the five year period from 2010 to 2014 has remained relatively stable with reduced traffic numbers in some locations particularly for 2012, although it is recognised that this may be attributable to lower visitor numbers due to unseasonable weather and also the major international event of the 2012 Olympics²⁵. In the 2015/16 period, AADT counts remained stable compared with 2014, with a slight decrease at some locations due to a road closure at Dunster²⁶.

²⁰ Exmoor National Park: About Exmoor National Park <http://www.exmoor-nationalpark.gov.uk/about-us/who-we-are-and-what-we-do>

²¹ Exmoor National Park Annual Monitoring Report 2014/15 http://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0012/688485/AMR-2014-15-final.pdf

²² Defra AQMAs Interactive Map <http://uk-air.defra.gov.uk/aqma/maps>

²³ West Somerset Local Plan (2014) West Somerset Local Plan Sustainability Appraisal Report Part 2: Scoping Information <https://www.westsomersetonline.gov.uk/Planning---Building/Planning-Policy/Local-Plan-to-2032/Sustainability-Appraisal>

²⁴ DECC (2016) UK local authority and regional carbon dioxide emissions national statistics: 2005-2014 <https://www.gov.uk/government/collections/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics>

²⁵ Exmoor National Park Annual Monitoring Report 2014/15 http://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0012/688485/AMR-2014-15-final.pdf

²⁶ Exmoor National Park Annual Monitoring Report 2015/16 http://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0005/839039/AMR-15-16-FINAL.pdf

Water Resources

- 1.7. The sources of the majority of Exmoor's streams and rivers are generally on the high moors. The landscape scale project Mires on the Moors²⁷ is using a partnership approach to restore areas of upland blanket bogs and mires on Exmoor, which will help to re-establish the natural flows of Exmoor's streams and rivers, improve their ecology, and increase the resilience of the ecosystem to the effects of climate change. The project has so far rewetted over 1000ha of moorland through blocking 99km of ditch with over 10,500 dams made from bales of natural moorland vegetation, wood and peat.
- 1.8. The majority of rivers in Exmoor, including the Barle, Exe, West Lyn, East Lyn and Badgworthy Water, have good ecological status – with the Heddon, Haddeo, Horner Water, Quarme, Pulham, Washford and Avill rivers all classified as moderate²⁸.
- 1.9. The East Lyn, Exe and Barle Rivers are particularly important for salmon spawning²⁹, and the River Barle is designated as a SSSI³⁰ as it is considered the best example in the UK of an upland acidic stream grading into a richer river over sandstone.

Biodiversity and Green Infrastructure

- 1.10. The National Park has two Special Areas of Conservation which are designated to protect the distinctive wildlife which can be found in these specific habitats – these are Exmoor Heaths SAC and Exmoor & Quantock Oakwoods SAC³¹. Together these areas cover around 12,600 ha of Exmoor which are also nationally recognised Sites of Special Scientific Interest (SSSIs). There are 18 SSSIs and three National Nature Reserves within the National Park³². The total area of the National Park designated by UK and European law to protect wildlife is 19,300 ha (28% of the National Park). Overall 97.2% of SSSIs on Exmoor are in 'favourable' or 'recovering' condition, and on land owned by the National Park Authority this figure is at 100% (against a national 2010 target of 95%)³³.
- 1.11. Exmoor also supports approximately 500 Local Wildlife Sites (formerly known as County Wildlife Sites), which are sites of substantive nature conservation value³⁴. Although they do not have any statutory status, many are equal in quality to the representative sample of sites that make up the series of statutory SSSIs.
- 1.12. The Exmoor moorlands cover just over a quarter (18,300 hectares) of the National Park, and are internationally important in terms of their upland, coastal heath and blanket bog biological communities. The 2008 Exmoor Moorland Breeding Bird Survey showed Exmoor to currently hold nationally important populations of nightjar, whinchat, stonechat, grasshopper warbler and Dartford warbler, and regionally significant numbers of merlin. Updates to this survey, undertaken in 2010 and 2013,

²⁷ Upstream Thinking: Exmoor Mires Partnership <http://upstreamthinking.org/index.cfm?articleid=8699>

²⁸ Exmoor National Park Annual Monitoring Report 2015/16 http://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0005/839039/AMR-15-16-FINAL.pdf

²⁹ Exmoor National Park: Fishing <http://www.exmoor-nationalpark.gov.uk/enjoying/fishing>

³⁰ Natural England: Designated Sites View

<https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=S2000143&SiteName=barle&countyCode=&responsiblePerson=>

³¹ Joint Nature Conservation Committee: SACs in the United Kingdom <http://jncc.defra.gov.uk/page-1458>

³² Defra: Magic Map <http://magic.defra.gov.uk/magicmap.aspx>

³³ Exmoor National Park Annual Monitoring Report 2014/15 http://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0012/688485/AMR-2014-15-final.pdf

³⁴ Exmoor National Park: Exmoor Wildlife Research and Monitoring Framework http://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0004/572593/Monitoring-Framework.pdf

identified a small increase in the number of breeding pairs of dunlin, particularly around areas that had been restored. Skylark, meadow pipit and snipe were also recorded as breeding at the sites surveyed. The moorlands also support nationally important populations of heath and high brown fritillary butterflies.

- 1.13. Exmoor has around 84,00ha of woodland (around 12% of the National Park area), about half of which is broadleaved. Around 2,000ha is classified as ancient semi-natural woodland – usually the most important for wildlife – and three woodland areas have been designated as National Nature Reserves (Tarr Steps, Horner Wood and Hawkcombe Wood). Notable wildlife species on Exmoor include all 16 species of British bats that live in woodlands and surrounding habitats, and in the coastal woodlands, rare endemic species of whitebeams are found. Exmoor's upland oak woodlands also support important populations of woodland migrants such as wood warbler, redstart and pied flycatcher and assemblages of rare mosses and lichens. The Forestry Commission designated Exmoor and the Exe Valley as one of only four Ancient Woodland Priority Areas in the South West³⁵.
- 1.14. Exmoor has some of the most unspoilt stretches of coast in England and is nationally important for wildlife – some lichen and bryophyte communities which have developed are of international importance. A salt marsh has become well established following a breach of the shingle ridge at Porlock Bay.
- 1.15. The high quality condition of rivers and streams on Exmoor support a wide variety of plants and animals, including several internationally rare mosses and liverworts. The River Barle is a SSSI as it is considered the best example in Britain of an acidic upland stream.
- 1.16. Exmoor's important habitats and species are identified in the Exmoor Wildlife Research and Monitoring Framework (2014-2020) which replaced the Exmoor National Park Biodiversity Action Plan - 207 priority species and 28 priority habitats are listed. Many species that occur on moor and heath have suffered substantial decline in recent years and a better understanding of factors affecting breeding success will be required to prevent the loss of species such as curlew and snipe.
- 1.17. There are strong links between the Exmoor Wildlife Research and Monitoring Framework and the objectives and targets for wildlife in the National Park Management Plan and policies in the current Local Plan.

Open Spaces

- 1.18. Within and adjoining the settlements of Exmoor are areas which are designated as important open space for recreation (40.38ha) or for visual amenity (39.82ha)³⁶. These spaces are considered to be important green infrastructure for communities. As Exmoor is a sparse rural area, there is little requirement for green infrastructure as most settlements are small and close to the rights of way network which includes a number of long distance trails such as the South West Coast Path and Two Moors Way.

³⁵ Exmoor National Park: Exmoor Wildlife Research and Monitoring Framework 2014-2020 http://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0004/572593/Monitoring-Framework.pdf

³⁶ Exmoor National Park Annual Monitoring Report 2014/15 http://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0012/688485/AMR-2014-15-final.pdf

Climate Change and Adaptation to Flood Risk

- 1.19. A large part of central Exmoor forms the upper part of the Exe catchment, drained by the River Exe itself and its main tributary, the Barle. The west side of the National Park is drained by the rivers Yeo, Mole and Bray into the river Taw. The northern side of the National Park is drained by shorter rivers and streams running north into the Bristol Channel including the UMBER, Heddon and West and East Lyn in the west and the Hawkcombe Stream, Homer, Aller, Aville and Washford River in the east. Many of the watercourses on Exmoor flow through steep confined valleys which respond rapidly to rainfall³⁷.
- 1.20. The management of water flow is one of the key aspects of catchment management as concentrated periods of high rainfall can lead to flash flood events. The most significant flood on Exmoor occurred in the North Devon area of the National Park. Lynmouth was devastated by floods from the East and West Lyn rivers in August 1952³⁸. The floods claimed 34 lives and left hundreds of people homeless after 23cm (9in) of rain fell on Exmoor in 24 hours.
- 1.21. Rapid run-off is thought to have been exacerbated by land drainage schemes on the moors and high ground. The Mire Restoration Project (now the Mires on the Moors Project) has a range of benefits including increasing rainfall storage and reducing peak run-off flows through blocking moorland ditches. This also creates a more stable flow in rivers and streams which helps to reduce flooding and erosion downstream.
- 1.22. The National Park is covered by three Catchment Flood Management Plans (CFMPs): North Devon, Exe and West Somerset. The Environment Agency has recently produced the Flood Risk Management Strategy for the South West River Basin District (2015)³⁹, which sets out proposed measures to manage flood risk in the south west river basin district.
- 1.23. The functional floodplain (Flood Zone 3b) has been mapped in the Level 1 SFRA – within the principal settlements of Dulverton, Porlock and Lynton & Lynmouth Flood Zones 3a and 3b have been defined, whereas areas outside these settlements the precautionary approach has been adopted whereby Flood Zone 3b has been assumed to equal the extent of Flood Zone 3a⁴⁰.
- 1.24. Urban areas identified in the SFRA most affected by fluvial flooding include Dulverton, Porlock, Lynmouth and Dunster – Porlock is also highlighted as the settlement most likely to experience a dramatic increase in fluvial flood risk due to the impacts of climate change. Porlock Weir is likely to be affected by tidal/coastal flooding.
- 1.25. The Shoreline Management Plan (SMP2) provides information regarding the risks of coastal change and the preferred strategy when considering future development and land use change on the coast. The Exmoor coastline is largely undeveloped and dominated by steep cliffs interspersed by steep sided valleys and Porlock Vale. The main settlements along the coast are Lynmouth and Porlock, with a small harbour and hamlet at Porlock Weir. The SMP2 approach to coastal change is to

³⁷ Exmoor National Park: Exmoor's Rivers and Streams <http://www.exmoor-nationalpark.gov.uk/Whats-Special/rivers-and-streams>

³⁸ Exmoor National Park: The Lynmouth flood disaster of 1952 <http://www.exmoor-nationalpark.gov.uk/learning/Lyn-Enquiry/the-lynmouth-flood-disaster-of-1952>

³⁹ Defra: South West River Basin District Management Plan (December 2015) <https://www.gov.uk/government/publications/south-west-river-basin-district-river-basin-management-plan>

⁴⁰ Exmoor National Park: SFRA <http://www.exmoor-nationalpark.gov.uk/planning/planning-policy?a=388663>

continue to allow it to evolve naturally to conserve important landscape characteristics; however it is proposed that the sea defences at Lynmouth will be maintained. At Porlock Weir it is proposed that there is no active intervention, but existing privately owned defences may be maintained/improved by the landowner - long term policy approaches will be required for this particular area⁴¹.

- 1.26. Natural coastal evolution will be allowed to continue along the Porlock shingle ridge area as the flood risk in this area is fluvial rather than tidal.
- 1.27. Climate change models based on a medium emissions scenario from the UK Climate Projections⁴² suggest that by the 2050s the South West will experience:
 - An increase in mean winter temperatures by 2.1°C.
 - An increase in mean summer temperatures by 2.7°C.
 - An increase in mean winter precipitation by 17%.
 - A decrease in mean summer precipitation by 20%.
 - An increase in sea level by 21.8cm (estimate for Cardiff⁴³).
- 1.28. It is predicted that climate change will bring milder and wetter winters with periods of long duration rainfall. In summer, frequent and short duration, high-intensity rainfall is likely. These scenarios are likely to cause increased flooding from fluvial, surface water and sewer sources. In addition, the effects of climate change on sea level will increase the likelihood of coastal and tidal flooding in low lying areas⁴⁴.

Climate Change Mitigation and Energy

- 1.29. Research for the Exmoor National Park Carbon Neutral Programme has shown that 351,774 tonnes of carbon dioxide equivalent (CO₂e) per year are emitted due to Exmoor's energy consumption, land use and agricultural activities – this equates to 14.1 tonnes per capita which is significantly higher than the national and regional averages⁴⁵. Agricultural emissions are the dominant source of greenhouse gases contributing 45% of the total emissions, with transport the next most important contributor. Car ownership is high within the National Park due to its relative remoteness and limited public transport provision; this also means that visitors to the National Park also predominantly travel by car. However a number of public transport schemes have been delivered to reduce the need for visitors to travel by car (see the Air Quality topic) within the National Park.
- 1.30. The Authority does not currently monitor all renewable energy generation; existing information is limited to planning applications for renewable energy installation. Exmoor has great potential for renewable energy generation and a number of small-scale renewable energy technologies have been permitted including solar, hydro and wind powered technologies and biomass heating systems. A recent trend of applications for micro-scale wind turbines has been evident on farms across the National Park.
- 1.31. In addition to reducing greenhouse gas emissions, there is carbon sequestration where carbon dioxide can be locked up in 'carbon sinks' such as trees and peat deposits. The Mire Restoration Project (now the Mires on the Moors Project) aims

⁴¹ North Devon and Somerset Coastal Advisory Group (NDASCAG) (2010) Shoreline Management Plan Review Shoreline Management Plan Review (SMP2) <http://www.ndascag.org/SMP2.html>

⁴² <http://ukclimateprojections.metoffice.gov.uk/22306>

⁴³ <http://ukclimateprojections.metoffice.gov.uk/21729>

⁴⁴ Exmoor National Park: SFRA Level 1 Report <http://www.exmoor-nationalpark.gov.uk/planning/planning-policy?a=388663>

⁴⁵ Forum 21: (Exmoor National Park Carbon Neutral Programme Consultation (2010) http://www.exmoor-nationalpark.gov.uk/___data/assets/pdf_file/0004/588370/Exmoor-Carbon-Neutral-Programme-Consultation-V2.pdf

to raise the water table in the main peat deposits so they can be maintained in good condition and do not release carbon into the atmosphere (through drying out and decay) but retain the potential to lock in more carbon. An estimated 1 million tonnes of carbon is stored in Exmoor's peat deposits.

Community wellbeing

Population

- 1.32. In the 2011 Census, there were 10,273 people living within Exmoor National Park⁴⁶. As is expected in a remote rural area such as a National Park, the population density is very low at 0.1 people per hectare.
- 1.33. Exmoor has a very low proportion of people from black or minority ethnic (BME) groups, with 98.8% of the population being of white ethnicity during the 2011 Census⁴⁷. There is a large Christian majority with Exmoor (66.9%), and very small proportions of other religions, which is comparable to other National Parks.
- 1.34. There is a steadily decreasing proportion of young people and increasing proportion of older people within the National Park. In mid-2014 32.5% of the population of Exmoor were aged 65⁴⁸ and over while the percentage of the population of the same age for England and Wales as a whole was 17.7%⁴⁹. The median age in Exmoor is 53, which is 14 years older than the national median⁵⁰.

Health

- 1.35. From 2011 census data households with at least one person with a long-term health condition made up 28.2% of the Exmoor population. The census statistics show that there is an above average number of older people with limiting long-term illnesses, which is a reflection of the higher than average proportion of people over 60 years of age (37% of the population).
- 1.36. Health profiles are only available at local authority level and therefore only apply to West Somerset and North Devon. However these profiles do provide an informative overview of the health of the area, particularly the West Somerset profile, as two-thirds of the National Park and three-quarters of the population is within this local authority area.
- 1.37. In West Somerset, levels of health are varied, with fewer early deaths from heart disease and stroke, comparable early deaths from cancer, fewer smoking related deaths, and fewer self-harm related stays in hospital in comparison with the national average⁵¹. However, the percentage of mothers smoking at time of delivery (15.2%), and the percentage of GP patients diagnosed with diabetes (7%) are higher than the national average.
- 1.38. Within North Devon the general health of people is also varied compared to the England average, with a lower rate of childhood obesity (17%) and fewer smoking

⁴⁶ Exmoor National Park Annual Monitoring Report 2014/15 http://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0012/688485/AMR-2014-15-final.pdf

⁴⁷ ONS 2011 Census <https://www.ons.gov.uk/census/2011census>

⁴⁸ ONS Annual Small Area Population Estimates: Mid-2014 and Mid-2013

<http://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/annualsmallareapopulationestimates/mid2014andmid2013#national-park-population-estimates>

⁴⁹ ONS Population Estimates for UK, England and Wales, Scotland and Northern Ireland, Mid-2014

<http://webarchive.nationalarchives.gov.uk/20160105160709/http://www.ons.gov.uk/ons/rel/pop-estimate/population-estimates-for-uk--england-and-wales--scotland-and-northern-ireland/mid-2014/index.html>

⁵⁰ ONS 2011 Census <https://www.ons.gov.uk/census/2011census>

⁵¹ Department of Health: West Somerset Health Profile 2015 <http://www.apho.org.uk/resource/view.aspx?RID=171892>

related deaths, but higher incidence of malignant melanoma and a higher number of hospital stays for self-harm⁵².

Deprivation

- 1.39. Index of Multiple Deprivation data is not available at National Park level; therefore information provided at the Local Authority level is referred to here. The most recent review of the index was carried out in 2015⁵³. In that review North Devon was ranked 127 while West Somerset was ranked 56 out of the 326 English Local Authorities measured, with 1 being the most deprived Local Authority in England.

Education

- 1.40. The information available for education is only reported at local authority level, and therefore the National Park area cannot be disaggregated from the data. In West Somerset those achieving qualifications at NVQ1 level and above has dropped from 90.3% of the total working population in December 2009 to 85.9% total working population in December 2015. This has risen however in comparison to December 2014 (74.4%)⁵⁴. The level of those achieving a similar level of qualification in North Devon has remained considerably more constant over the same period. Of the total working population, 86.1% achieved NVQ1 level or higher in December 2009 and 86.5% of the total working population achieving the same level of qualification in December 2014. This has risen recently however, as in December 2015 92.1% of the working population achieved NVQ1 level or higher⁵⁵. For comparison, the percentage of those attaining the same level of qualification increased in the South West region from 84.1% to 89.5% of the total working population from December 2009 to December 2014, with only a small increase to 89.7% in 2015⁵⁶.
- 1.41. In West Somerset the percentage of the population who were working age with NVQ level 3+ qualification in 2015 was 48.3%⁵⁷. This is in comparison to 47.9% who reached the same level of education at the same time in North Devon.

Economy and Employment

- 1.42. As described above, Exmoor National Park is a sparse rural area with a high proportion of older people. This has influenced the nature of the local economy, with a high proportion of self-employed people. This reflects the nature of an economy dominated by small-scale businesses.
- 1.43. Exmoor's economy is also focused upon a number of key sectors such as tourism, agriculture and public services.
- 1.44. Agriculture and forestry are essential for shaping and maintaining the characteristic landscape of the National Park, but it is tourism and related services that are now the main source of employment. A diverse range of other services, and some manufacturing, provide the remaining employment in the locality.

⁵² Department of Health: North Devon Health Profile 2015 <http://www.apho.org.uk/resource/view.aspx?RID=171868>

⁵³ Department for Communities and Local Government: English indices of deprivation 2015 <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2015>

⁵⁴ Nomis: West Somerset Qualifications Time Series https://www.nomisweb.co.uk/reports/lmp/la/1946157382/subreports/quals_time_series/report.aspx?

⁵⁵ Nomis: North Devon Qualifications Time Series https://www.nomisweb.co.uk/reports/lmp/la/1946157361/subreports/quals_time_series/report.aspx?

⁵⁶ Nomis: South West Qualifications Time Series https://www.nomisweb.co.uk/reports/lmp/gor/2013265929/subreports/gor_quals_time_series/report.aspx?

⁵⁷ Nomis: West Somerset Qualifications Time Series https://www.nomisweb.co.uk/reports/lmp/la/1946157382/subreports/quals_time_series/report.aspx?

- 1.45. The majority of businesses on Exmoor are of a micro-scale (employing five or less people). However, the local economy is resilient and there are generally low levels of unemployment and high levels of entrepreneurship.
- 1.46. Data from the 2011 census shows that 66.6% of the population of Exmoor National Park was economically active at that time⁵⁸. This was significantly lower than the average for the South West (80.2%). The high level of economic inactivity may be attributed to the fact that large numbers of people decide to move to Exmoor for early retirement – retirees accounted for 22.8% of the economically inactive people in the National Park in the 2011 census.

Land-based Industries

- 1.47. The State of the Uplands report⁵⁹ confirms that sole trader businesses dominate the economy of the upland areas in England. The most significant finding of this report was the decline in upland grazing farm incomes which decreased by 40% between 2003/4 and 2007/8 to £10,400. Defra has identified that farms on uplands tend to have lower incomes than those on lowland farms due mainly to the higher proportion of grazing livestock at upland locations⁶⁰. Many farmers are therefore developing other sources of income to sustain farming practices – the most popular form of diversification is the letting of farm buildings. On Exmoor the most popular form of farm diversification is the conversion of traditional farm buildings to self-catering holiday lets. While on-farm diversification is an important source of income, the State of Farming report for the National Park also recognised that off-farm working is more important for those with a lower dependency on farm income⁶¹.
- 1.48. More recently, game bird shooting has become a significant contributor to the Exmoor economy – a study by PACEC⁶² estimates that £9.6 million is spent each season on this activity within the greater Exmoor area, supporting 1,600 jobs locally, and increasing the use of visitor accommodation during the low season months.

Tourism & Recreation

- 1.49. The high quality landscape, wildlife and cultural heritage that Exmoor provides are a major attraction for visitors and underpin the local tourism industry. In 2007 Exmoor National Park became only the second English National Park to have been awarded the European Charter for Sustainable Tourism in Protected Areas, awarded by the Europarc Federation, and received the award again in 2013⁶³. This award recognises national parks which are developing and managing sustainable tourism through development, management or tourist activity which ensures the long term protection and conservation of natural, cultural and social resources, in addition to positively contributing to the economic development of protected areas.

⁵⁸ ONS 2011 Census <https://www.ons.gov.uk/census/2011census>

⁵⁹ Commission for Rural Communities High ground, high potential – a future for England's upland communities (2010) http://webarchive.nationalarchives.gov.uk/20110303145243/http://ruralcommunities.gov.uk/wp-content/uploads/2010/06/CRC114_uplandsreport.pdf

⁶⁰ Defra 2011 Uplands Policy Review (2011)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/221096/pb13456-upland-policy-review2011.pdf

⁶¹ Countryside and Community Research Institute: The State of Farming in Exmoor 2015 http://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0011/656174/Finalthe-state-of-farming-in-exmoor-2015-final-report_22-may.pdf

⁶² PACEC The Role of Game Shooting In Exmoor (2012) http://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0006/271653/GESAPACECreport231006-3.pdf

⁶³ EUROPARC Federation: Charter network http://www.europarc.org/nature/european-charter-sustainable-tourism/charter-network/?utm_source=ep&utm_medium=body&utm_campaign=linktrack&utm_content=wysiwyg&

- 1.50. Tourism is the largest single component of the Exmoor National Park economy valued at approximately £113m per year⁶⁴. The number of visitor days within Exmoor National Park was 2.14m in 2015.
- 1.51. Non-serviced accommodation had an increase in visitor days of 4% from 2014 to 2015. The visitor days for serviced accommodation increased by 4% from 2014 to 2015.
- 1.52. The Exmoor Tourism Partnership (which was formed from organisations including West Somerset Council, Somerset County Council, Exmoor National Park Authority, the Exmoor Tourist Association and North Devon+) was recently merged in 2015 with the Exmoor Tourist Association to form Exmoor Tourism. Actions will be delivered through a joint action plan focussing on promotion, quality and sustainability⁶⁵.

Historic Environment

- 1.53. The Historic Environment Research Framework for Exmoor explains the importance of the National Park's historic environment, which contributes to its special character and contains rare and important relict landscapes⁶⁶.
- 1.54. Exmoor contains a remarkable record of landscape change over 8,000 years and the preservation of sites within the National Park is generally excellent due to the remote upland nature of much of the area and extensive farming methods. Therefore Exmoor is considered as having the lowest degree of risk to the historic environment, although it is noted that upland areas, including Dartmoor and Exmoor, are sensitive to agricultural pressures through both under and over grazing and traditional farm buildings are faced with redundancy.
- 1.55. Within Exmoor National Park there are a number of heritage assets which are statutorily protected⁶⁷:
 - 16 conservation areas (Allerford, Bossington, Dulverton, Dunster, Luccombe, Lynmouth, Lynton, Parracombe, Porlock, Porlock Weir, Selworthy, Winsford, Wootton Courtenay and three farmsteads).
 - 200 scheduled ancient monuments (SAMs).
 - 742 listed buildings (20 Grade I, 54 Grade II*, and 668 Grade II).
 - 2 historic parks and gardens.
- 1.56. Exmoor has a wealth of historic buildings and settlements which are as much a part of the local character and distinctiveness of the area as the spectacular landscape of the National Park. 19 scheduled monuments are considered to be at risk by Historic England – notification of damage or neglect of listed buildings usually occurs when buildings change ownership. The Conservation Areas all have Character Appraisals which record the key features which contribute to their character – these traits can be eroded by small incremental changes over time, including insensitive modernisation.

⁶⁴ Global Tourism Solutions STEAM DRAFT TREND REPORT FOR 2009-2015: Exmoor National Park http://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0016/821221/EXNP-IN-PARK-Final-STEAM-Report-2009-2015-30-Jun-16-CC.pdf

⁶⁵ Exmoor Tourism Partnership <http://www.exmoortourismpartnership.org.uk/>

⁶⁶ Exmoor National Park: The Historic Environment Research framework for Exmoor 2010-15 http://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0009/137268/research_framework_series1.pdf

⁶⁷ Exmoor National Park Annual Monitoring Report 2014/15 http://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0012/688485/AMR-2014-15-final.pdf

- 1.57. The historic landscape of Exmoor is central to its appearance today and is a reminder of how the landscape has been shaped by human habitation and activity – the character of the former Royal Forest has been defined by its ownership since the mediaeval period. In other areas, small hamlets and farmsteads reached by a network of narrow sunken lanes, lie at the heart of distinctive field patterns.

Housing

- 1.58. Almost half of the housing within Exmoor National Park in 2015 was detached (46.9%), which is comparable to other National Parks, but considerably higher than national and regional figures⁶⁸. 66.2% of homes within Exmoor National Park are owner occupied compared to 72.4% within North Devon and 64.3% within West Somerset. This high percentage may reflect in-migration of those selling homes elsewhere to buy housing outright, attracted by the high quality environment of the Exmoor National Park. There were 5,787 household spaces (dwellings) recorded in the 2011 census, of which 19.2% were dwellings with no usual residents (second holiday and empty homes).
- 1.59. The largest proportion of household type is family households, but a significant sector is single pensioner households which make up 18% of the total. The mid-2012 population projections produced by ONS for the National Park showed a stable but ageing population as the numbers of people aged over 60 increases and the younger generation decreases. Those over the age of 60 accounted for 4,186 of the total population of 10,226. These results will be significant when planning for future housing need.
- 1.60. Exmoor has one of the highest differentials between local wages and house prices in the country. The 2015 Annual House Price Survey found the ratio between mean average house price and the average household income was 10:1 - reflecting high house prices within the National Park and the need for affordable housing within Exmoor communities⁶⁹.
- 1.61. The average house price in the National Park has more than trebled since 1998 (when the average mean house price was £128,882), despite there being a fall in house prices during 2008 and 2009 and again in 2011. West Somerset was one of the top five districts with the highest percentage of cash house purchases (49.1%) after the Isles of Scilly which is the highest⁷⁰. The proportion of cash purchases is a useful indicator of pressurised rural housing markets, since high proportions often relate to areas with high proportions of second homes. It also reflects the number of older people buying homes in the National Park, as older buyers are more likely to pay cash for their homes, i.e. if they are downsizing and releasing enough cash to be able to buy without a mortgage⁷¹. Affordability problems, compounded by a loss of council housing (through Right to Buy) together with low historic levels of new affordable housing, are well documented features of rural communities.
- 1.62. To improve information on local needs and help develop affordable housing, a number of parish housing need surveys have been undertaken within the National

⁶⁸ Housing Vision: Strategic Housing Market Assessment Update - Exmoor National Park (2015) http://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0007/753946/EB29-Housing-Vision-2015-SHMA-Update-Exmoor-National-Park-March-2015.pdf

⁶⁹ Exmoor National Park: Exmoor National Park Annual House Price Survey (2015) http://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0009/756081/EB30-ENPA-2015-ENP-Annual-House-Price-Survey-2014.pdf

⁷⁰ Exmoor National Park: Core Strategy & Development Management Policies Sustainability Appraisal Scoping Report (2011) http://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0012/123501/SA-SCOPING-REPORT-web.pdf

⁷¹ Hamptons International Focus Cash Buyers (2013) <http://www.hamptons.co.uk/media/118933/cod971-cashbuyersreport-lr-web.pdf>

Park which has helped to deliver much needed local affordable housing in communities with significant need. During 2008 a housing need survey was conducted for the whole of the National Park to provide evidence for the Local Development Framework that was being prepared at that time⁷². The survey found a total of 195 households which considered themselves to be in housing need, and 130 of those met the current policy requirements to occupy new local need affordable housing. Despite parish level household surveys being the best method of estimating local affordable housing need, experience has shown that once proposals for new affordable housing are more advanced the number of households coming forward are almost always higher than original estimates indicate.

- 1.63. During period the 2014 to 2015 17 affordable houses were completed or under construction in the National Park. In addition, another 7 affordable units were granted planning permission but construction had not yet been undertaken⁷³.
- 1.64. The majority of local affordable homes have been for rent provided through Registered Providers together with a number of intermediate affordable homes completed – these are privately owned and meet the needs of those with incomes higher than those who require RSL rented accommodation, but who cannot afford open market prices. The tenure of intermediate affordable dwellings is subject to a legal agreement to ensure that the occupants meet the qualifying criteria of policy.
- 1.65. The proportion of dwellings built on previously developed land during 2015/16 was 83%⁷⁴, increasing from just 33% in 2013/14. This is an increase of 5 dwellings built on previously developed land between 2013/14 and 2015/16, but due to the limited scale of development in the National Park, this has a large impact on the percentage figures.

Land

Agricultural Land

- 1.66. Exmoor is dominated by upland hill farming as a combination of topography and climate favours livestock farming, although there are areas of better quality agricultural land where some arable crops are grown (Grade 1, 2 and 3) within Porlock Vale, the lower slopes of the Brendon Hills and the southern tip of the National Park⁷⁶.
- 1.67. Some 64% of Exmoor National Park is part of an existing environmental stewardship agri-environment agreement. Some schemes, including Environmentally Sensitive Areas and Entry and Higher Level Stewardship schemes, have closed to new entrants. It is anticipated that 90% of existing Higher Level Stewardship agreements will move into the higher tier of the Countryside Stewardship scheme (introduced in 2015). The majority of Entry Level Stewardship agreements are not expected to be eligible for Countryside Stewardship, which

⁷² Exmoor National Park: Parish Housing Surveys <http://www.exmoor-nationalpark.gov.uk/living-and-working/affordable-housing/parish-housing-need-surveys>

⁷³ Exmoor National Park Annual Monitoring Report 2014/15 http://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0012/688485/AMR-2014-15-final.pdf

⁷⁴ Exmoor National Park Annual Monitoring Report 2015/16 http://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0005/839039/AMR-15-16-FINAL.pdf

⁷⁵ Exmoor National Park Annual Monitoring Report 2013/14 http://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0010/518482/AMR-FINAL-05.12.14.pdf

⁷⁶ Defra: Magic Map <http://magic.defra.gov.uk/magicmap.aspx>

would result in loss of an agri-environment payment scheme for some areas of land in the National Park⁷⁷.

- 1.68. Within the National Park there are 450 Environmentally Sensitive Area agreements and 160 Environmental Stewardship agreements covering around 49,000 hectares of Exmoor – this is around 86% of the eligible area of the National Park⁷⁸. Through these agreements the important ecological habitats of Exmoor; moorland, coastal heath and unimproved grassland are maintained and enhanced as well as historic features such as field boundaries, traditional farm buildings and monuments.

Brownfield Land

- 1.69. There is very little brownfield land within the National Park due to the sparse rural nature of the area and small settlement pattern; however a large percentage of new housing has been built on brownfield land in 2015/16 (83%)⁷⁹.

Contaminated Land

- 1.70. Due to the rural nature of Exmoor, there is unlikely to be any major area of land contamination within the National Park. Although there has been a history of mining (mainly iron and some copper and silver-lead workings) it is unlikely that this presents any current contamination threat. Modern day contamination risks are considered to be:

- petrol filling stations; and
- uncontrolled waste deposits – through fly-tipping activity.

- 1.71. Groundwater source protection zones (SPZs) are particularly vulnerable to contamination and activities within or near these zones need to be closely monitored to reduce the risk of contamination. These zones may include boreholes and springs used for public drinking water supply. The SPZs within the National Park are generally very small, with a cluster around the River Exe, near Exford and a couple of larger SPZs and within the north-eastern area of Exmoor, notably towards the settlements of Timberscombe, Bossington and Luxborough⁸⁰.

Waste

- 1.72. Devon and Somerset County Councils are the Waste Disposal Authorities for the National Park, with West Somerset and North Devon District Councils being the waste collection authorities, also providing services such as recycling. Within the National Park, West Somerset and North Devon operate a fortnightly refuse collection and a fortnightly kerb-side recycling service⁸¹.
- 1.73. Waste data is therefore collected by the County Councils on a district boundary basis and is not available separately for the National Park area. The percentage of household waste sent for reuse, recycling or composting in West Somerset in

⁷⁷ Exmoor National Park Annual Monitoring Report 2015/16 http://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0005/839039/AMR-15-16-FINAL.pdf

⁷⁸ Exmoor National Park: Core Strategy & Development Management Policies Sustainability Appraisal Scoping Report (2011) http://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0012/123501/SA-SCOPING-REPORT-web.pdf

⁷⁹ Exmoor National Park Annual Monitoring Report 2015/16 http://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0005/839039/AMR-15-16-FINAL.pdf

⁸⁰ Environment Agency (2016) What's in Your Backyard: Groundwater <http://maps.environment-agency.gov.uk/wiyby/>

⁸¹ Exmoor National Park Annual Monitoring Report 2015/16 http://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0005/839039/AMR-15-16-FINAL.pdf

2014/2015 was 49.18% and in North Devon in 2014/2015 was 44.23%. In 2013/2014 in England as a whole 43.67% of waste was recycled⁸².

- 1.74. There are no landfill sites within the National Park and no civic amenity waste collection points since the one at Lyn Down near Lynton was closed in 2013. A number of settlements also have recycling facilities in addition to kerbside collections.

Minerals

- 1.75. There are currently no mining activities within the National Park and no active quarries⁸³. However, there are a number of disused quarries on Exmoor which were primarily used for local building stone. Many of Exmoor's older buildings were constructed of the local Devonian Sandstone. However, due to the geology of Exmoor other stone is used at various localities – in the Lynton area grey sandstone was used and 'new red' sandstones in the eastern area of the National Park, softer sandstones were also quarried near Porlock.
- 1.76. One quarry in the National Park was registered as an Interim Development Order (IDO) permission in 1992 – this means that the permission for the Barlynch quarry, which has been inactive since the 1950s, could be reactivated but would have to comply with the requirements of the Local Plan policy for Interim Development Order Permissions and require an Environmental Impact Assessment.

Landscape

- 1.77. Exmoor is one of only a few upland areas within southern England but is still relatively low; the highest point at Dunkery Beacon is 519m above sea level. The upland areas are characterised by relatively flat moorland plateaus interspersed with steep, incised wooded valleys – the upland areas also reach the coast where the some of the spectacular cliffs are amongst the highest sea-cliffs in England. The landscape has been shaped by both natural elements and human activity over thousands of years; however its remoteness, topography and climate have helped to maintain a large extent of well preserved, semi-natural upland landscapes. The settlements are mainly small dispersed villages which are generally located in the valleys. The relatively low level and small-scale nature of development within the National Park places limited pressure on the landscape which helps to maintain the overall character of the landscape^{84 85}.
- 1.78. As detailed by the Landscape Sensitivity Study⁸⁶, Exmoor's landscape is dominated by open moorland from the north to the central area of the National Park. Towards the south enclosed farmland with commons becomes from prevalent interspersed with incised wooded valleys which become more widespread towards the south east. In the north east of the National Park areas of farmed and settled vale, wooded and farmed hills and plantation hills become more dominant in the landscape. From this starting point areas have been identified in terms of their sensitivity to new development.

⁸² DEFRA: Local authority collected waste: annual results tables <https://www.gov.uk/government/statistical-data-sets/env18-local-authority-collected-waste-annual-results-tables>

⁸³ Exmoor National Park (date unavailable) FILEX 5: Geology on Exmoor

⁸⁴ Exmoor National Park: Landscape Sensitivity Study (2013) <http://www.exmoor-nationalpark.gov.uk/planning/planning-policy?a=388702>

⁸⁵ Exmoor National Park: Exmoor Landscape Character Assessment (2007) http://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0005/583232/Landscape-Character-Assessment-document.pdf

⁸⁶ Exmoor National Park: Landscape Sensitivity Study (2013) <http://www.exmoor-nationalpark.gov.uk/planning/planning-policy?a=388702>

- 1.79. The process of landscape characterisation on Exmoor has identified nine separate character types and 26 character areas within those types⁸⁷. The appraisal of the landscape character types and areas does raise a number of modern day pressures facing Exmoor's landscape today, most of which derives from small-scale, incremental change and land management. More recent pressures such as farm fragmentation, equestrian development and game shooting activity have also had negative impacts on landscape character and the increase in these particular pressures and future pressures from further telecommunication infrastructure, renewable energy technologies and energy crops are trends causing concern within and in areas surrounding the National Park. A number of improvements to landscape character have been put in place with landowners through Environmental Stewardship and Higher Level Stewardship schemes.
- 1.80. To promote and enhance tranquillity on Exmoor, The National Park Authority has undertaken a survey of 'dark skies' in the National Park which has identified a 'Dark Sky Zone' with almost no artificial light sources within the area and a surrounding buffer zone. The National Park was designated as an International Dark Sky Reserve in 2011, being the first designated in Europe, and the second in the world⁸⁸. There are currently only eleven of these designations in the world⁸⁹.

Coast

- 1.81. Exmoor has some of the most unspoilt stretches of coastline in England, with very little development along its length⁹⁰. Many areas of high coastal heath and woodland are close to as natural condition as possible and therefore are important areas for wildlife, and the rocky cliffs between Lynmouth and Heddon's Mouth are important nesting sites for seabirds such as guillemots, fulmar and razorbills .
- 1.82. Around 82% of the Exmoor coastline is in the ownership of the National Trust or public bodies and the whole coastline is a designated Heritage Coast, although this does not give any statutory protection⁹¹.
- 1.83. Currently there is no statutory protection for the offshore areas from Exmoor's coast. However, under the Marine & Coastal Access Bill the formation of Marine Plans will help to integrate marine and land planning and inform the spatial uses and needs of particular areas. Exmoor falls within the South West Inshore Marine Plan Area⁹². The National Park Authority has previously worked with other organisations on the development of the Severn Estuary Strategy which includes part of the Exmoor coastline.
- 1.84. The Shoreline Management Plan Review (SMP2)⁹³ sets out the long term objectives for sections of the Exmoor coast and for much of the coastline the long term action is to let it evolve naturally This action has minimal impact, although there may be concerns regarding coastal squeeze for some important wildlife habitats – however

⁸⁷ Exmoor National Park: Exmoor Landscape Character Assessment (2007) http://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0005/583232/Landscape-Character-Assessment-document.pdf

⁸⁸ Exmoor National Park: Stargazing <http://www.exmoor-nationalpark.gov.uk/enjoying/stargazing>

⁸⁹ International Dark-sky Association: International Dark Sky Reserves <http://www.darksky.org/night-sky-conservation/87-international-dark-sky-reserves>

⁹⁰ Exmoor National Park: Exmoor Landscape Character Assessment (2007) http://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0005/583232/Landscape-Character-Assessment-document.pdf

⁹¹ Exmoor National Park Annual Monitoring Report 2014/15 http://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0012/688485/AMR-2014-15-final.pdf

⁹² Marine Management Organisation: Marine Plan Areas in England (2014) <https://www.gov.uk/government/publications/marine-plan-areas-in-england>

⁹³ North Devon and Somerset Coastal Advisory Group (NDASCAG): Shoreline Management Plan Review Shoreline Management Plan Review (SMP2) <http://www.ndascag.org/index.html>

rates of erosion are relatively slow. For the coastal settlement of Lynmouth where sea defences already exist, it is proposed that these defences would be retained in the long term.

- 1.85. In the small coastal settlement of Porlock Weir the policy action is 'no active intervention' – the existing defences are privately owned and the owner had indicated intent to maintain and possibly improve them. However, any larger defences are not considered appropriate and may demonstrate adverse effects on the rest of Porlock Bay. A Pathfinder Project developed by Somerset County Council was a specific project for Porlock Weir to inform the local community and landowners of the possible long term consequences for the settlement in terms of coastal change. The SMP has helped to inform policy considerations for this particular area of coast in the Local Plan.

Transport

- 1.86. The National Park has no major strategic road or rail corridors – the two principal routes on Exmoor are the A39 and A396, with the A399 passing close to and through the western boundary of the Park. Important local freight routes also include the B3190, B3224 and the tertiary route from Machine Cross to Heathpoult Cross. The small rural lanes framed by beech hedgerows serving farms and communities are important to the character of the National Park and are important historic and attractive features in their own right⁹⁴. The responsibility for roads and traffic management lies with Devon and Somerset County Councils (as Highway Authorities); therefore the implementation of policies rely on a close working relationship with both authorities.
- 1.87. There are no railway connections within the National Park. The nearest mainline stations are located at Barnstaple, Tiverton and Taunton. The West Somerset Railway is a branch line of the former Great Western Railway and operates as a steam train attraction close to the north-eastern boundary of the National Park. There are aspirations that this railway could provide a public service by offering commuter services to Taunton; however there are no definite plans for this type of service to develop. In the western part of Exmoor a small section of the former Lynton to Barnstaple Railway has been reinstated at Woody Bay over a one mile stretch as a tourist attraction. The Exmoor Enterprise project hopes to raise enough funds to be able to reinstate the railway line from Lynton to Wistlandpound Reservoir. Proposals for reinstatement of the line from Wistlandpound to Barnstaple are still at the early stages of being planned as third part of the project⁹⁵.
- 1.88. Within the National Park, travel by bus is the only real alternative to travelling by private modes of transport (not including opportunities for walking and cycling for short local journeys); however the number and frequency of bus services are few on Exmoor and are generally considered to be inadequate for the needs of residents and visitors. National research has shown that only 2% of visitors use public transport to reach National Parks in the UK while over 93% of visitors arrive by car⁹⁶ – it is believed that this figure is likely to be higher for Exmoor due to the distance from mainline rail connections. In nearby urban areas, 25 – 30% of people do not have access to a car and therefore are restricted in accessing the experiences and

⁹⁴ Exmoor National Park: Exmoor Landscape Character Assessment (2007) http://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0005/583232/Landscape-Character-Assessment-document.pdf

⁹⁵ Lynton & Barnstaple Railway Trust: <http://www.lynton-rail.co.uk/>

⁹⁶ Exmoor National Park: Tourism <http://www.nationalparks.gov.uk/learningabout/ourchallenges/tourism>

opportunities gained from accessing the National Park due to limited public transport provision.

- 1.89. There are no hourly bus services that serve the National Park, but bus services including the 10, 198, and 310/309, serve a number of settlements on Exmoor more than five days a week and five journeys per day⁹⁷.
- 1.90. Some community transport schemes and demand responsive transport such as the Slinky Bus (serving the West Somerset parishes in the National Park) serve areas where people do not have access to their own transport or regular public transport – these schemes are subsidised by the County Councils. The ExploreMoor website has been developed by the Authority to encourage visitors to the National Park to use public transport to explore the National Park. The Moor Rover bus runs throughout the main summer holiday period (July to September) to provide a flexible bus service for residents and visitors to enjoy Exmoor based on a dial-a-ride booking system⁹⁸.
- 1.91. There are few opportunities to encourage cycling as an alternative mode of transport except for short local journeys, as the topography of Exmoor is not ideal, and many people in employment commute outside the National Park to work in larger employment centres. Route 3 of the National Cycle Network passes through the southern area of the National Park along minor roads from Five Cross Way near Brayford to Dulverton⁹⁹.
- 1.92. The extensive rights of way network in the National Park extends to almost 1,000km in conjunction with around 18,000ha of open access land available for walking. Around 55% of the rights of way network is available for horse-riding and cycling. The National Park Authority is responsible for the management and maintenance of the rights of way network including the provision of way-marking signs and replacement gates/stiles. There are also a number of long distance walking trails including 34 miles of the South West Coast Path national trail and regional trails such as the Coleridge Way, Two Moors Way, Tarka Trail and Exe Valley Way¹⁰⁰.

Traffic Flows and Commuting Patterns

- 1.93. . Due to the rural nature of the National Park and its dispersed settlements, it is not unexpected that 45.6% of residents aged 16 or over in employment commuted to work by car or van. A large proportion of those living within the National Park travel less than 10km to work (including those working at or from home). Of those people working in the south west, 63% work in West Somerset and 26% in North Devon, with Taunton Deane, Sedgemoor and Mid Devon also being popular destinations to work. Those working within the National Park¹⁰¹ live primarily in West Somerset (74%) with the remainder living in North Devon (26%)¹⁰².
- 1.94. The 2011 census results also indicated that a large sector of the working population worked at or from home (37%) – this was a considerable proportion of the working age population when compared to the national average (10.3%), but reflects the rurality of the National Park and the high level of self-employment compared to

⁹⁷ Exmoor National Park: ExploreMoor – Travel Information <http://www.exmoor-nationalpark.gov.uk/enjoying/travel>

⁹⁸ Exmoor National Park: ExploreMoor – Travel Information <http://www.exmoor-nationalpark.gov.uk/enjoying/travel>

⁹⁹ Sunstrans: Route 3 <http://www.sunstrans.org.uk/ncn/map/route/route-3>

¹⁰⁰ Exmoor National Park: Right of Way <http://www.exmoor-nationalpark.gov.uk/enjoying/out-and-about-essentials/rights-of-way>

¹⁰¹ As Exmoor National Park cannot be defined as a 'workplace area' by ONS, a best-fit has been drawn based on census output areas.

¹⁰² ONS (2015) Bespoke Census 2011 Tables for Exmoor National Park

regional and national statistics. The increasing importance of fast internet connections to enable people to work at home is also a significant factor.

- 1.95. Retaining local services and facilities such as shops, Post Offices and schools in rural settlements helps to address the issue of accessibility over mobility and has benefits for both visitor and resident alike. The loss of such services means that people have to travel further and require available modes of transport to do so.
- 1.96. Traffic flows on Exmoor increase during the main summer months when greater numbers of tourists visit the National Park. For example, average annual traffic levels on the A39 at Lynton are 2,803 per day whereas in August the average daily traffic count is 4,079¹⁰³. Although traffic pressures are not severe there can be specific areas which face congestion issues and parking problems during the busy holiday periods. The draft Carbon Neutral Programme Consultation has highlighted that 18% of greenhouse gas emissions from Exmoor arise from transport¹⁰⁴.
- 1.97. The impacts of traffic on the environment of Exmoor are mainly experienced through the congestion of streets and over-demand of parking spaces in some settlements and 'honey-pot' sites during peak times, such as the main summer holiday period¹⁰⁵. These impacts can reduce the quality of life and experience of the National Park for both residents and visitors, in addition to some damage to building fabric and restricting the passage of larger vehicles and emergency services. These incidents are restricted to main holiday periods and generally traffic flow is relatively uninterrupted. In some settlements on-street parking also serves to reduce traffic speed, especially where main roads pass through the settlement.
- 1.98. Maintenance and management of the main route network on Exmoor and its approaches should be commensurate with the distinctive needs of the National Park for transporting people and goods in relation to the local economy. The network includes both the A and B roads and advisory routes for lorries, including in particular the important tertiary route between Heathpoult and Machine Crosses. The route network has to accommodate both local and incoming motoring and freight traffic and public transport modes, and the often complex routing of individual drivers, such as tourists and delivery vans. Road maintenance and winter resilience are especially important as well as highway design, appropriate signage, and parking provision which facilitate access and safe flow of traffic.

¹⁰³ Exmoor National Park Annual Monitoring Report 2014/15 http://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0012/688485/AMR-2014-15-final.pdf

¹⁰⁴ Forum 21: (Exmoor National Park Carbon Neutral Programme Consultation (2010) http://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0004/588370/Exmoor-Carbon-Neutral-Programme-Consultation-V2.pdf

¹⁰⁵ Exmoor National Park Annual Monitoring Report 2014/15 http://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0012/688485/AMR-2014-15-final.pdf

Appendix 2

Consultation Responses: SA Report for the Draft Local Plan (2013)

Table A2.1: Consultation Responses for the 2013 SA Report for the Draft Local Plan

Consultee	SA-relates consultation responses	Action/amendments to the SA
Historic England (formerly English Heritage)	We have no comments to make on the Sustainability Appraisal Report Exmoor National Park Draft Local Plan.	No action required.
Natural England	<p>We are satisfied the Sustainability Appraisal has provided a systematic assessment of the draft Plan in terms of its consistency with the principles of sustainable development, including social and economic as well as likely environmental effects. We also consider the sustainability objectives to be clear and relevant to the national park, and that the SA findings and recommendations have helped to refine emerging policies. We are also largely satisfied that the requirements of the requirements of the Strategic Environmental Assessment (SEA) Directive have been met. However, while we welcome the NPA's commitment to work with adjoining authorities to support networks of green infrastructure, the Plan's relationship with emerging plans of neighbouring authorities would benefit from further detail.</p> <p>We suggest the next iteration of the SA (SEA) report should further explain the plan's relationship to those of neighbouring authorities which would demonstrate how these have been taken into account in the preparation of the plan. It should also help to ensure potential conflicts and opportunities have been identified and promote a coordinated cross boundary approach.</p>	<p>Chapter 3 of this report includes a section explaining the relationship between the Exmoor Local Plan and the neighbouring authorities' plans.</p>

Appendix 3

SA Framework

Table A3.1: SA Framework

Topic	Objectives	Criteria - will the proposals in the Plan...	Indicators
Air Quality and Water Resources	<p>1. To minimise air pollution (including greenhouse gas emissions) and water pollution and ensure air and water quality is maintained or improved.</p> <p>Explanation: <i>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>Explanation: <i>These objectives seek to conserve and enhance Exmoor's biodiversity, habitats and species so that any negative impacts from development are avoided or mitigated when meeting the needs of communities and visitors.</i></p>	<ul style="list-style-type: none"> • Conserve and enhance the diversity of species? • Conserve and enhance the diversity of habitats? • Make provision for protected and important species and habitats where appropriate? • Have no adverse impact on SACs or SSSIs? • Enhance local biodiversity and the natural environment? 	<ul style="list-style-type: none"> • Area of new BAP habitat created or restored. • Number of SACs and SSSIs in favourable or unfavourable recovering condition. • Proportion of Local Wildlife Sites where positive conservation management has been or is being implemented (NI197). • Number of applications with provision for protected/important species. • Number of applications with provision for protected/important habitats. • Number of applications where a wildlife survey has been

Topic	Objectives	Criteria - will the proposals in the Plan...	Indicators
			submitted.
Climate Change and Adaptation to Flood Risk	<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>Explanation: <i>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.
Climate Change Mitigation and Energy	<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>Explanation: <i>This objective seeks to minimise greenhouse gas emissions, promote sustainable living, implement sustainable building practices and install renewable</i></p>	<ul style="list-style-type: none"> • Ensure development incorporates energy sustainability measures? • Maximise Exmoor's potential for renewable energy generation? • Improve the sustainability of Exmoor's communities? • Encourage the use of sustainable building design and methods? • Encourage travel by sustainable means of 	<ul style="list-style-type: none"> • Domestic per capita CO2 (tonnes) – measure every 5 years. • Number of planning permissions for renewable technologies and other energy sustainability measures. • Housing development that incorporates energy and sustainability measures (above building regulation requirements).

Topic	Objectives	Criteria - will the proposals in the Plan...	Indicators
	<p><i>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>transport?</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? 	<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.

Topic	Objectives	Criteria - will the proposals in the Plan...	Indicators
		<ul style="list-style-type: none"> • Affect specific sub groups disproportionately compared with the whole population? • Cause changes in contacts with health and/or care services, quality of life, disability or death rates? • Likely to cause public or community concerns about potential health impacts of this policy change? • Create safe and attractive public spaces? • Promote local multi service centres? • Improve opportunities for community participation? • Improve access to recreational space, leisure activities, learning and cultural opportunities? 	
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.	<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 	<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

Topic	Objectives	Criteria - will the proposals in the Plan...	Indicators
	<p>Explanation: <i>This objective seeks to support and enhance the key sectors of the Exmoor economy and at the same time support the growth of small businesses. Economic development will be appropriate to the National Park setting and where possible will benefit from and help to promote the National Park's special qualities.</i></p>	<p>businesses?</p> <ul style="list-style-type: none"> • 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? 	<p>accommodation.</p> <ul style="list-style-type: none"> • % of tourism businesses participating in green/sustainable initiatives or schemes. • Number of applications permitted to create serviced/non-serviced accommodation. • Loss of serviced/non-serviced accommodation. • Number of applications permitted for: camp sites, camping barns, certificated caravan sites. • Number of applications/floorspace (<i>or monitor completed development</i>) for business development (B1, B2 & B8). Could also include separate indicators for A class uses and C1. • Number of planning applications for change of use from business to other use. • Number of live/work/home-working spaces permitted. • Number and area of agricultural buildings permitted. • Number and proportion of agricultural buildings refused. • Number of farm diversification proposals permitted for:

Topic	Objectives	Criteria - will the proposals in the Plan...	Indicators
			<ul style="list-style-type: none"> • Conversion of traditional farm building • Conversion of modern farm building • New building • Number of applications permitted for development for game-bird shooting. • Number of applications approved for equestrian development.
Historic Environment	<p>8. To maintain and enhance the quality of the built environment.</p> <p>Explanation: <i>This objective seeks to maintain and enhance the built and historic environment of Exmoor through allowing sympathetic and sustainable design and alteration of new and existing buildings.</i></p>	<ul style="list-style-type: none"> • Conserve the character of historic landscapes? • Conserve the character of settlements and buildings? • Protect and enhance ancient monuments and other heritage assets? • Recognise the potential of the historic environment to contribute to social and economic progress. • Improve access and understanding of local heritage. • Promote a standard of quality in new building design? • Encourage use of local and traditional and 	<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
		sustainable buildings products and materials? <ul style="list-style-type: none"> Enhance the distinctiveness and diversity of the local built environment and community spaces? 	
Housing	<p>9. To help ensure that National Park-communities have access to appropriate, good quality, sustainable, affordable housing.</p> <p>Explanation: <i>This objective seeks to provide housing to maintain balanced living and working communities and in doing so provide a sustainable mix of affordability, size and type of housing that is of good design and sustainable materials and provides for the needs of young and older people and those whose work is important to communities.</i></p>	<ul style="list-style-type: none"> Provide affordable housing? Provide for the housing needs of older people? Provides for the housing needs of young people? Provides for those whose work is important to the conservation of the National Park and viability of communities? Provides for the needs of agricultural and forestry workers? Ensures affordable housing remains affordable in perpetuity? Housing development makes good use of existing land and buildings? Conserves and enhances the special qualities of the 	<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

Topic	Objectives	Criteria - will the proposals in the Plan...	Indicators
		National Park? <ul style="list-style-type: none"> Helps development to incorporate energy and sustainability measures? Provides a better mix of sizes, types and affordability. 	building regulation requirements). <ul style="list-style-type: none"> Number of empty and second homes. Number of households in housing need.
Land (including agricultural, brownfield, contaminated land, waste and minerals)	<p>10. To promote sustainable forms of development and sustainable use of natural resources.</p> <p>Explanation: <i>This objective seeks to concentrate and diversify development by optimising the use of previously developed land, infrastructure, under used land and vacant properties.</i></p> <p>11. To reduce all forms of waste production and promote reuse and recycling and minimise the risk of contaminated land.</p> <p>Explanation: <i>Although the National Park is not the waste authority, it will seek to implement policies to reduce the amount of waste generated and to promote sustainable</i></p>	<ul style="list-style-type: none"> Promote sustainable mineral extraction? Promote the reuse of land and buildings? Protect the best and most versatile land from development? Contribute to the reduction, reuse and recycling of waste? Contribute to appropriate waste treatment and disposal? Minimise the risk of contaminated? Reduce soil quantity and quality? 	<ul style="list-style-type: none"> Number of planning permissions built on previously developed land. Loss of the best and most versatile agricultural land to development (need a GIS layer available on PACS). Loss of greenfield land to development. Percentage of waste generated, recycled, composted and sent to landfill. Number of planning permissions for redevelopment of contaminated sites. Number and type of mineral applications permitted.

Topic	Objectives	Criteria - will the proposals in the Plan...	Indicators
	<i>waste management.</i>		
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 landscape? • Contribute to the wild, remote and tranquil setting of Exmoor? • 	<ul style="list-style-type: none"> • Number of planning permissions (outside the National Park boundary) that enable large structures and development to be visible from the National Park boundary. • Agri-environment scheme uptakes. • Percentage change in farming businesses. • Loss or damage to key landscape features (woodlands, walls, hedges and hedgerbanks) • Change in 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</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? 	<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.

Topic	Objectives	Criteria - will the proposals in the Plan...	Indicators
	<p><i>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"> • Consider the implications sea level rise may have on historic and cultural assets? 	<ul style="list-style-type: none"> • Number of planning permissions for temporary business development in areas vulnerable to coastal change.
<p>Transport</p>	<p>14. Encourage travel by sustainable means of transport and provide access to services, whilst recognising the need to travel by private modes of transport in a dispersed rural area such as Exmoor.</p> <p>Explanation: <i>This objective, although aspirational in seeking to reduce travel by means of the private car, recognises that Exmoor is a dispersed rural area where currently there is a need to travel by private modes of transport in order to access services and facilities.</i></p>	<ul style="list-style-type: none"> • Help to ease traffic congestion in the tourism season and provide more sustainable ways of accessing the National Park? • Safeguard public rights of way? • Improve opportunities for safe horse-riding, cycling and walking as an alternative to car travel? • Reduce the need to travel, especially by private car? • Improve access to online and mobile services to reduce travel by car? • Support demand responsive, low-carbon public transport for the local community? • Support improved (and low 	<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.

Topic	Objectives	Criteria - will the proposals in the Plan...	Indicators
		carbon) access to essential goods and services?	

Appendix 4
SEA Directive Requirements

Table A4.1: SEA Directive Requirements

SEA Directive Requirements	Reported in...
An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes.	Scoping Report / Environmental Report ¹⁰⁶ Chapter 3
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Scoping Report and updated in Appendix 1
The environmental characteristics of areas likely to be significantly affected.	Scoping Report and updated in Appendix 1
Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Scoping Report / Environmental Report Chapter 3
The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	Scoping Report / Environmental Report Chapter 3
The likely significant effects (1) on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.	Environmental Report Chapters 6-14
The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Environmental Report Chapters 6-14
An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Environmental Report Chapter 14
A description of the measures envisaged concerning monitoring.	Environmental Report Chapter 14
Where an environmental assessment is required...an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated.	Throughout the Environmental Report
A non-technical summary of the information provided under the above headings.	A Non-technical summary of the Environmental Report has been produced and is available

¹⁰⁶ Note that the "Environmental Report" is the SEA Directive terminology, and refers to this SA Report.

SEA Directive Requirements	Reported in...
	separately
The (environmental) authorities...shall be consulted when deciding on the scope and level of detail of the information which must be included in the environmental report.	Consultation on the Scoping Report took place in 2010
Taking the environmental report and the results of the consultations into account in decision-making (Art. 8)	Environmental Report Chapter 14

Appendix 5

Implications of the Proposed Main Modifications for the SA findings

REF	PDLP PAGE	POLICY/ PARAGRAPH	PROPOSED MAIN MODIFICATION	REASON	DOES MAIN MODIFICATION AFFECT PREVIOUS SA SCORING?
SECTION 3: GENERAL POLICIES					
MM1	14	After para. 3.3	<p><u>Exmoor National Park's special qualities are:</u></p> <ul style="list-style-type: none"> <u>Large areas of open moorland providing a sense of remoteness, wildness and tranquillity rare in southern Britain</u> <u>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</u> <u>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 night skies can be appreciated</u> <u>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</u> <u>A complex and rich historic landscape that reflects how people have lived in, used 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, hamlets, picturesque villages and historic estates</u> <u>A deeply rural community closely linked to the land with strong local traditions and ways of life</u> <u>A farmed landscape with locally distinctive breeds such as Red Devon cattle; Devon Closewool, and Exmoor Horn sheep; and herds of free living Exmoor ponies</u> <u>An exceptional rights of way network, with paths that are often rugged and narrow in character, along with extensive areas of open country and permitted access, providing superb opportunities for walking, riding and cycling</u> <u>A landscape that provides inspiration and enjoyment to visitors and residents alike</u> 	To insert the 'special qualities' as defined by the Authority in the Exmoor National Park Partnership Plan – to reflect the special qualities referred to in the statutory purposes.	No – the proposed modification only expands on the special qualities of the National Park in the supporting text.
MM2	17	Paras. 3.19 – 3.20	<p>3.19 The paragraph below sets out four principles to underpin opportunities for the enhancement of the National Park and reflecting the first statutory purpose. It takes forward objectives in the Plan including to:</p> <p>a) ensure that Exmoor's moorlands remain open, remote and relatively wild in character; that views are preserved;</p> <p>b) conserve and enhance Exmoor's landscapes as living working landscapes</p>	Remove text which repeats Plan objectives and introduces principles which do not have policy status.	No – the proposed modification only amends supporting text and not the policy itself.

REF	PDLP PAGE	POLICY/ PARAGRAPH	PROPOSED MAIN MODIFICATION	REASON	DOES MAIN MODIFICATION AFFECT PREVIOUS SA SCORING?
			<p>that remain predominately free from intrusive developments;</p> <p>c) 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.</p> <p>3.20 Principles for the enhancement of the National Park:</p> <p>a) opportunities for enhancing the special qualities and valued features of the National Park should be identified and responded to.</p> <p>b) proposals to enhance the National Park should demonstrate a significant overall benefit to the natural beauty, wildlife and cultural heritage, including the historic environment, of the area and should not undermine the achievement of other Plan Policies.</p> <p>c) opportunities should be taken to enhance the National Park by the treatment or removal of intrusive structures or features in a way which conserves the special qualities or valued features of the site and its surroundings.</p> <p>d) opportunities which arise for the enhancement of natural resources, land (including contaminated land and the removal of pollutants) and access/transport should be taken.</p>		

REF	PDL P PAGE	POLICY/ PARAGRAPH	PROPOSED MAIN MODIFICATION	REASON	DOES MAIN MODIFICATION AFFECT PREVIOUS SA SCORING?
MM3	19	Para. 3.26	<p>The National Park Authority will therefore consider whether a proposed development is deemed to be 'major' on a case by case basis taking into account the potential impacts of the proposed development on; the National Park and in its local context</p> <p><u>a) the local context – this should include taking into account the nature and sensitivity of the site, including landscape character and the size and form of any local settlements, as well as the degree of change over time in terms of the level and scale of past development; and</u></p> <p><u>b) the potential harm to the natural beauty, wildlife and cultural heritage of the National Park by reason of its scale, character and nature. The decision will not be on the basis of likely impact after that harm is reduced through mitigation. The extent to which harm could be moderated will be considered as part of the assessment process.</u></p>	Introduction of text to explain 'major development' in the context of paragraph 116 of the National Planning Policy Framework (NPPF)	No – the proposed modification only amends supporting text and not the policy itself.
MM4	20	Policy GP2	<p>GP2 MAJOR DEVELOPMENT</p> <ol style="list-style-type: none"> 1. In the context of the National Park, major development is defined as development which has the potential to have a significant adverse impact on the National Park and its special qualities due to its scale, character and nature. 2. In securing National Park purposes and responding to the National Park's duty to foster the social and economic wellbeing of its communities, applications for major development will not be permitted except in exceptional circumstances and only then following the most rigorous examination; where applicants can demonstrate that they are in the public interest. 3. Proposals for major development will need to demonstrate: <ol style="list-style-type: none"> a) the need for the development, including in terms of any national considerations; b) the impact of permitting it, or refusing it, upon the local economy and local communities and the extent to which it will provide a significant net benefit to the National Park; c) the cost of, and scope for, developing elsewhere outside the National Park, or meeting the need for it in some other way; d) that there are no significant effects on proposed or designated European sites for nature conservation both within their boundaries and in areas that ecologically support the conservation objectives of the site; e) any detrimental effect on the natural and historic environment, the landscape, and recreational opportunities, including taking into account 	Points of clarification	No – the proposed modification has only resulted in minor changes to policy wording.

REF	PDL P PAGE	POLICY/ PARAGRAPH	PROPOSED MAIN MODIFICATION	REASON	DOES MAIN MODIFICATION AFFECT PREVIOUS SA SCORING?
			<p>the National Park's special qualities, and the extent to which <u>any such effect could be moderated</u> (through applying the avoidance, mitigation and compensation sequence of tests set out in clause 4 of this policy);</p> <p>f) that the cumulative impact of the development when viewed with other proposals and types of development is acceptable; and</p> <p>g) the scope for adequate restoration of the land once the use has ceased.</p> <p>4. Where the tests of clause 3 have been met, then every effort to avoid adverse effects will be required. Where adverse effects cannot be avoided, appropriate steps must be taken to minimise harm through mitigation measures. Appropriate and practicable compensation will be expected for any unavoidable effects that cannot be mitigated.</p>		
SECTION 4: CONSERVING AND ENHANCING EXMOOR					
MM5	36	Para. 4.27	<p>While often development can, and with care be accommodated in the landscape, other developments can potentially have unacceptable adverse impacts on landscape character and visual amenity due to their scale, massing, siting, materials, colour or arrangement and therefore could appear to be incongruous within Exmoor's landscape. Potential impacts will vary on a case by case basis according to the type of development and the sensitivity of the surrounding landscape. Some of these effects may be minimised by addressing the particular landscape or visual amenity issues raised by a proposed development. <u>Environmental Impact Assessments (EIA) should also include Landscape and Visual Impact Assessments (LVIA). However, where an EIA is not required, applications which are considered to be significant in terms of scale and/or impact should provide a LVIA. Applicants will be advised at a pre-application stage whether a LVIA is likely to be required.</u></p>	To include reference to Landscape and Visual Impact Assessments.	No – the proposed modification only amends supporting text and not policy itself.
MM6	37	Policy CE-S1	<p>CE-S1 – LANDSCAPE AND SEASCAPE CHARACTER</p> <p>1. The high quality, diverse and distinct landscapes and seascapes of Exmoor National Park will be conserved and enhanced.</p> <p>2. Development should be informed by and complement the distinctive characteristics of the:</p> <p>a) Landscape Character Types and areas identified in the Exmoor National Park Landscape Character Assessment (LCA); and</p> <p>b) Seascape character areas and types identified in the North Devon and Exmoor Seascape Character Assessment.</p>	To incorporate seascapes and the Seascape Character Assessment within the policy.	Yes – the proposed modification has expanded the policy wording to ensure that developments complement seascape character as well as landscape

REF	PDLP PAGE	POLICY/ PARAGRAPH	PROPOSED MAIN MODIFICATION	REASON	DOES MAIN MODIFICATION AFFECT PREVIOUS SA SCORING?
			<p>3. Development proposals should also have regard to, and be appropriate in terms of impact with the conservation of significant landscape and seascape attributes, including:</p> <p>a) <u>Section 3 Land;</u> b) <u>Heritage Coast;</u> c) <u>Landscape setting of Exmoor's settlements;</u> d) <u>Historic field patterns and boundary features;</u> e) <u>Important trees, tree groups and orchards.</u></p> <p>4. Opportunities to conserve, enhance and restore important landscapes, <u>seascapes</u> and <u>their</u> landscape characteristics as identified in the LCA, including minimising existing visual detractions, will be encouraged.</p>		character.
MM7	38	Policy CE-D1	<p>CE-D1 PROTECTING EXMOOR'S LANDSCAPES AND SEASCAPES</p> <p>1. Development will be permitted where it can be demonstrated that it is compatible with the conservation and enhancement of Exmoor's landscapes and seascapes through ensuring that:</p> <p>a) the visual impact of the development in its immediate and wider setting is minimised through high quality design that reflects local landscape character with particular regard to scale, siting, materials, and colour; and</p> <p>b) the cumulative and/or sequential landscape and visual effects of development do not detract from the natural beauty of the National Park and the experience of tranquillity.</p> <p>2. Within Exmoor's Heritage Coast development should be appropriate to the coastal location and conserve the undeveloped nature of the coast consistent with Heritage Coast purposes.</p> <p>3. Landscaping schemes should reinforce local landscape or seascape character and where these are required, conditions will be attached to protect important landscape characteristics and elements and whether appropriate replacement or additional landscape elements will be required.</p> <p>4. Proposals which are considered to be significant in terms of scale and/or impact should provide a professional landscape appraisal <u>Landscape and Visual Impact Assessment</u> as part of the application submission.</p>	To include reference to Landscape and Visual Impact Assessments.	No – Only minor policy wording changes proposed.
MM8	51	Policy CE-S3	<p>CE-S3 BIODIVERSITY AND GREEN INFRASTRUCTURE</p> <p>1. The conservation and enhancement of wildlife, habitats and sites of geological interest within the National Park will be given great weight.</p> <p>2. Development delivery, management agreements and positive initiatives will conserve, restore and re-create priority habitats and conserve and increase</p>	<p>Consistency with the NPPF</p> <p>Minor wording</p>	No – policy only introduces text in line with NPPF to further explain level of protection to be

REF	PDLP PAGE	POLICY/ PARAGRAPH	PROPOSED MAIN MODIFICATION	REASON	DOES MAIN MODIFICATION AFFECT PREVIOUS SA SCORING?
			<p>priority species identified for Exmoor in the Exmoor Wildlife Research and Monitoring Framework (or successor publication).</p> <p>3. Sites designated for their international, national or local importance, <u>priority habitats, priority or</u> protected species, ancient woodland, <u>and</u> of veteran trees will be protected from development likely to have direct or indirect adverse effects <u>including</u> on their conservation objectives <u>including notified features,</u> and <u>ecological functioning of cited habitats and species. Protection will be commensurate with their status, giving appropriate weight to their importance, in accordance with the following principles:</u></p> <p>a) <u>Development in, or likely to have an adverse effect on, the conservation objectives of internationally designated sites either directly or indirectly, including on features outside the designated site which support the ecological functioning of cited habitats and species, or on the integrity of the special interest of nationally designated sites, will not be permitted.</u></p> <p>b) <u>Development likely to cause harm to legally protected species, or lead to the loss of or damage to their habitats, will not be permitted unless this can be mitigated or then offset so that local populations are at least maintained.</u></p> <p>c) <u>Development likely to adversely affect local sites designated for their wildlife will not be permitted, unless it can be demonstrated that the need for, and benefits of, the development clearly outweigh the loss of biodiversity and this can be mitigated against and compensated for elsewhere.</u></p> <p>d) <u>Development likely to adversely affect priority species and habitats must be avoided wherever possible (subject to the legal tests afforded to them) unless the need for, and the benefits of the development are exceptional and clearly outweigh the loss of biodiversity and this can be mitigated against and compensated for elsewhere.</u></p> <p>e) <u>Development resulting in the loss or deterioration of irreplaceable ancient woodland (including ancient semi-natural woodland and plantations on ancient woodland sites) and veteran trees, will not be permitted unless the need for and the benefits of the development are wholly exceptional and clearly outweigh the loss of biodiversity.</u></p> <p>4. Regionally important geological sites (RIGS) will be safeguarded for their geological and geomorphological interest.</p> <p>5. Where, in exceptional circumstances, the wider sustainability benefits of the development are considered to outweigh the harm to habitats, species or the geological interest of sites, then measures will be required to first avoid such impacts, and if they cannot be avoided, then to mitigate damage harm and</p>	changes in relation to ecological networks	afforded to different biodiversity designations.

REF	PDLP PAGE	POLICY/ PARAGRAPH	PROPOSED MAIN MODIFICATION	REASON	DOES MAIN MODIFICATION AFFECT PREVIOUS SA SCORING?
			<p>provide appropriate compensatory measures.</p> <p>6. The enhancement of biodiversity and creation of multi-functional green infrastructure networks at a variety of spatial scales, including cross-boundary connectivity to areas adjacent to the National Park, that help support ecosystem services will be encouraged.</p> <p>7. Opportunities will be promoted for habitat management, restoration, expansion that strengthens the resilience of the ecological network, and enables habitats and species adapt to climate change or to mitigate the effects of climate change.</p> <p>8. Green infrastructure that incorporates measures to enhance biodiversity, including <u>matrix dispersal</u> areas identified within the ecological network, should be provided as an integral part of new development.</p>		
MM9	57	Policy CE-S4	<p>CE-S4 CULTURAL HERITAGE AND HISTORIC ENVIRONMENT</p> <p>1. Exmoor National Park's local distinctiveness, cultural heritage, and historic environment, will be conserved and enhanced to ensure that present and future generations can increase their knowledge, awareness and enjoyment of these special qualities.</p> <p>2. H <u>Development proposals affecting heritage assets</u> (identified on the Exmoor National Park Historic Environment Record) and their settings, will be considered in a manner appropriate to their significance including:</p> <p>a) designated conservation areas, scheduled monuments, listed buildings, and registered historic parks and gardens; and</p> <p>b) non-designated heritage assets that are of equivalent significance to scheduled monuments, including those that may be discovered in the future;</p> <p>b) e) locally important historic sites and features, and including (d) Principal Archaeological Landscapes.</p> <p>3. Development proposals should make a positive contribution to the local distinctiveness of the historic environment and ensure that the character, special interest, integrity, and significance of any affected heritage asset and its setting is conserved <u>and or</u> enhanced.</p> <p>4. Development proposals likely to affect heritage assets <u>and/or the setting of heritage assets</u> should be supported by a desk-based assessment <u>appropriate to their significance</u>, and i In appropriate <u>certain</u> cases, developers will be required to arrange for archaeological <u>field or historic building</u> evaluations –</p>	Consistency with the NPPF	No – the changes to policy wording have not changed the intention of the policy.

REF	PDLP PAGE	POLICY/ PARAGRAPH	PROPOSED MAIN MODIFICATION	REASON	DOES MAIN MODIFICATION AFFECT PREVIOUS SA SCORING?
			<p>these should be prepared in accordance with the Conduct of Archaeological Work and Historic Building Recording within Exmoor National Park (Annex 1).</p> <p>5. Where development proposals are likely to cause <u>will lead to substantial harm to, or total loss of significance of, a designated heritage asset, significant harm to or loss of designated heritage assets or assets of national significance</u>, permission will be refused.</p> <p>6. Adverse impacts on locally important heritage assets <u>and/or their settings</u> should be avoided. Where proposals are likely to cause <u>substantial harm to or loss to</u> locally important assets, permission will only be granted in exceptional circumstances where the public benefit outweighs the asset's historic or archaeological interest, <u>having regard to the scale of any harm or loss and the significance of the heritage asset</u>. The features of interest should be preserved in situ, but where this is not justifiable or feasible, provision must be made for appropriate preservation by record.</p> <p>7. Development proposals should positively reinforce the historic character of Exmoor's settlements through reflecting the traditional vernacular architecture and enhancing local distinctiveness.</p>		
MM10	60	Policy CE-D3	<p>CE-D3 CONSERVING HERITAGE ASSETS</p> <p>1. Conservation Areas</p> <p>Development proposals affecting Conservation Areas should ensure that:</p> <p>a) the character <u>and</u> or appearance of the area are preserved or enhanced;</p> <p>b) they deliver high quality design and incorporate materials that reflect the scale, architectural quality and detailing of the area.</p> <p>2. Principal Archaeological Landscapes</p> <p>Development proposals affecting Principal Archaeological Landscapes (PALs) should be well related to existing development and of a scale and form that will not cause unacceptable adverse effects on the significance, integrity or context of the PAL as a whole or its individual components.</p> <p>3. Heritage Assets and their Settings</p> <p>Development proposals affecting a heritage asset and its setting should demonstrate:</p> <p>a) a positive contribution to the setting through sensitive design and</p>	Points of clarification	No –only minor policy wording changes proposed.

REF	PDLP PAGE	POLICY/ PARAGRAPH	PROPOSED MAIN MODIFICATION	REASON	DOES MAIN MODIFICATION AFFECT PREVIOUS SA SCORING?
			<p>siting;</p> <p>b) the promotion of the understanding and enjoyment of the heritage asset and its setting or better reveal its significance and appreciation of the setting; and</p> <p>c) avoidance of unacceptable adverse <u>effects</u> and cumulative visual effects that would impact on the setting.</p> <p>4. Heritage Assets and Climate Change</p> <p>Development proposals affecting heritage assets that are required to adapt to, or mitigate the effects of, climate change will be permitted where it can be demonstrated that:</p> <p>a) measures to adapt to climate change will safeguard the heritage asset over the longer term, and conserve their special interest; or</p> <p>b) measures to mitigate the effects of climate change will not harm the special interest or appearance of the heritage asset.</p> <p>5. Redundant Heritage Assets and Assets at Risk</p> <p>a) development proposals that seek to bring heritage assets, that are redundant or at risk, into a viable use in ways that are consistent with their long term conservation will be encouraged; and</p> <p>b) proposals should be consistent with policy CE-S4 Cultural Heritage and Historic Environment and CE-S5 Principles for the Conversion or Structural Alteration of Existing Buildings to ensure they continue to positively enhance local character and distinctiveness.</p>		
MM11	62	Para. 4.121	<p>Where a traditional building is regarded as structurally unsound unsatisfactory for conversion, i.e. if or would require substantial reconstruction, extension or alteration is proposed or where the building is derelict, has no roof or is structurally unsound; the proposal will be classified as a 'new build' rather than 'conversion' and will need to accord with the relevant policies set out in this Local Plan. Such proposals should still seek to retain the embodied energy in the building and the historic fabric of the structure. It may be preferable for some ruined buildings to remain <u>as ruins</u> with measures in place to stabilise their structure where they are of landscape or historic value.</p>	Points of clarification regarding the structural condition of buildings.	No – the proposed modification only amends supporting text and not policy itself.
MM12	63	Para. 4.125A	<p>4.125A In terms of the conversion of buildings to a residential use, it is recognised that the floorspace of existing buildings will occasionally be larger than the required gross</p>	New paragraph to clarify the approach	No – the proposed modification only

REF	PDLP PAGE	POLICY/ PARAGRAPH	PROPOSED MAIN MODIFICATION	REASON	DOES MAIN MODIFICATION AFFECT PREVIOUS SA SCORING?
			<p><u>internal area for certain occupancy restrictions (HC-S2 A Balanced Housing Stock). Where the proposed gross internal area exceeds the policy requirement, the application should demonstrate how the following points have been considered:</u></p> <ul style="list-style-type: none"> a) <u>The desirability of converting all the existing structure in terms of achieving conservation and enhancement of the building and its setting.</u> b) <u>Whether the building can be converted to more than one dwelling unit.</u> c) <u>Whether part of the building can remain unconverted, or used as ancillary storage/garaging to ensure the habitable space does not exceed the required gross internal area.</u> <p><u>For any dwelling with a floor space restriction, but particularly local affordable dwellings, any increase in the gross internal area should be reasonable in relation to the policy requirement, as the size of the dwelling will have a substantial bearing on its value and affordability over the longer term.</u></p>	for converting an existing building to a residential use (where a floorspace restriction is required).	amends supporting text and not policy itself.
MM13	65	Policy CE-S5	<p>CE-S5 PRINCIPLES FOR THE CONVERSION OR STRUCTURAL ALTERATION OF EXISTING BUILDINGS:</p> <ol style="list-style-type: none"> 1. The conversion or structural alteration of any existing building will be permitted where the proposal: <ol style="list-style-type: none"> a) accords with the relevant policies in this Plan in terms of the intended use; b) clearly demonstrates that the building is capable of conversion without substantial reconstruction; c) is suitable for the existing building in terms of the intended use and the intensity of that use, in relation to its capacity, structure and character without substantial alteration; where the conversion of a building relates to a change of use to a dwelling, sufficient curtilage space should be provided where the delineation of this space would not individually or cumulatively result in harm to the character of the building or its setting; and d) <u>maintains or replaces any existing bat and barn owl roosts are maintained or replaced.</u> 2. In addition to clause 1, proposals for the conversion or structural alteration of traditional buildings, should also: <ol style="list-style-type: none"> a) ensure the historic fabric, and architectural interest of the building and 	Points of clarification.	No –only minor policy wording changes proposed.

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			<p>its setting including the retention of existing traditional and historic features are conserved and enhanced; <u>and</u></p> <p>b) reflect the character and significance of the building and conserve its traditional appearance through sensitive design and the use of traditional materials, detailing and construction principles; and</p> <p>3. c) c Conditions will be attached to remove permitted development rights granted by the General Permitted Development Order 1995 to ensure the character and appearance of traditional buildings are conserved.</p> <p>4. 3. In addition to clause 1, proposals for the conversion or structural alteration of non-traditional buildings, will only be considered permitted if traditional buildings are demonstrated to be incompatible with the intended use or no such buildings are present, and where:</p> <p>a) the building is of permanent and substantial construction; and</p> <p>b) measures to provide environmental and visual enhancement to the building and/or its setting are incorporated <u>into the proposals where necessary to deliver an overall acceptable scheme.</u></p>		
MM14	69	Paras. 4.153 – 4.154	<p>4.153 The treatment of individual design elements is of critical importance to a successful overall design and should be considered once the character of an area has been assessed and key principles of scale, massing and form have been addressed. The use of materials and detailing of elements such as doors and windows will have a significant bearing on how well a new development complements its surroundings. The National Park Authority will seek to ensure that such detailing will enhance the design of the development in a style and arrangement which contributes to and strengthens the local character. The National Park Authority expects that windows and doors should be constructed of timber since this is a both a traditional and sustainable material which has the potential to be grown locally. Timber detailing (windows, doors, weatherboards etc.) when in hardwood or pre-treated, can <u>also</u> be repaired and have a long lifespan. There are examples of wooden windows on Exmoor which have lasted for well over 100 years. Metal-framed windows may be considered where it is clearly part of the local character of the area or reflects the elements of an original building to be replaced.</p> <p>4.154 Some building materials are not considered appropriate in the National Park for aesthetic and environmental reasons, <u>meaning that they can appear incongruous when used in traditional buildings or historic settings and can erode the character and appearance of the building, local area or street scene. For example, as well as the surface finish, some uPVC window and conservatory designs can also</u></p>	Points of clarification regarding materials	No –additional supportive text provided to expand on the use of building materials.

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			<p>have much thicker, un moulded frames than timber, and the designs and detailing (applied glazing bars, joints, non-traditional forms of openings and/or wider frames for opening elements in comparison with the fixed panes) are for the most part limited in terms of being effective replacements for traditional timber designs. The Authority wishes to see the use of timber for window frames as the primary approach to fenestration. However, uPVC window frame / conservatory design has improved and some products now have a closer resemblance to the character, profile and appearance of a traditional timber window. Such Alternative materials may be considered in exceptional certain circumstances for non-traditional buildings in areas outside Conservation Areas (e.g. in the case of some minor extensions to, or replacement windows in, post-war/non-traditional buildings) where existing materials and the age, form and setting of the building may indicate such consideration). Particular attention will be paid to the fenestration of the principal elevation of any building as well as any elevations which are publicly visible. It will be necessary to demonstrate that a non-timber window or conservatory would have the same high quality appearance as a traditional timber one - that the design and form has a character and appearance that complements the building; the frame and glazing bars are slim; each pane is individually glazed; the openings operate in a traditional form (including sliding sashes where that form of window is proposed); and the frame and glazing bars have appropriate mouldings. The design must be of the highest quality and the proposal will not where it can be demonstrated that there will be no adversely impact on local character or heritage assets and their settings (CE-S4), and the design is of the highest quality.</p>		
MM15	70	Para. 4.162	<p>Policy CE-S6 applies to all types of development (new build and conversions) except agricultural and forestry buildings; the design aspects of which will be considered under policy SE-S4 (Agricultural and Forestry Development). In relation to the conversion of existing buildings proposals should also accord with the principles set out in policy CE-S5.</p>	Points of clarification	No –additional supportive text provided to expand on what is meant by ‘all types of development’.
MM16	71	Policy CE-S6	<p>CE-S6 DESIGN AND SUSTAINABLE CONSTRUCTION PRINCIPLES</p> <p>1. Development proposals should deliver high quality sustainable designs that conserve and enhance the local identity and distinctiveness of Exmoor’s built and historic environment and landscape character and in doing so applicants will be expected to demonstrate the following design principles:</p>	Modifications to clause 1 reflect that the policy refers to conversions and new build development.	No – modifications to clauses 2 and 3 are very similar to previous policy wording.

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			<p>a) All <u>new build</u> development should positively contribute to its setting in terms of siting, massing, scale, height, orientation, density and layout.</p> <p>b) The materials and design elements of a <u>new building or conversion of an existing building</u>, should complement the local context through the use of traditional and natural sustainable building materials. The use of locally-sourced sustainable building materials will be encouraged.</p> <p>c) Design should reinforce landscape character and the positive arrangement of landscape features through planting and landscaping schemes, boundary treatments, and surfacing. Existing features such as trees, hedges and stone walls should be retained particularly where they are characteristic of the streetscape and/or the local area.</p> <p>d) Design should have regard to health and well-being and ensure that sufficient public and/or private space is provided or available, and footpaths and cycleways are incorporated where appropriate.</p> <p>e) The design and layout of new development should have regard to improving safety, inclusivity and accessibility for those who live, work and visit there.</p> <p>f) The layout and design of new streets and associated infrastructure, required as part of <u>new build</u> development proposals, should respond to local character and the scale, and proportions of the historic street pattern. Opportunities for streets to be used as social spaces will be encouraged.</p> <p>g) The use and activity of the new development should not detrimentally affect the amenities of surrounding properties and occupiers including overlooking, loss of daylight, overbearing appearance, or other adverse environmental impacts.</p> <p>2. Proposals for new development should also demonstrate how they will incorporate sustainable construction methods that:</p> <p>a) promote the sustainable use of resources;</p> <p>b) reduce carbon emissions by improving or generating energy efficiencies including through renewable and low carbon technologies (CC-S5)</p> <p>c) Future proof against climate change impacts in accordance with CC-S1; and</p> <p>d) Provide adequate storage for recycling waste.</p> <p><u>2. To incorporate sustainable construction methods, proposals should:</u></p>	<p>Modifications to clauses 2 and 3 to reflect new Government policy and guidance.</p>	

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			<p>a) <u>promote the sustainable use of resources;</u> b) <u>provide adequate access to and storage for recycling waste; and</u> c) <u>future proof against climate change impacts, including flood risk, in accordance with CC-S1.</u></p> <p><u>3. Proposals that reduce carbon emissions by improving or generating energy efficiencies above those required by Building Regulations, including through renewable and low carbon technologies (CC-S5), will be encouraged.</u></p>		
MM17	74	Policy CE-D5	<p>CE-D5 ADVERTISEMENTS AND PRIVATE ROAD SIGNS</p> <p>1. Advertisements, and private road signs will only be permitted where it can be demonstrated that in the interests of amenity:</p> <p>a) the proposal represents a joint or / community advertisement or sign; or (b) the advertisement is located on, or is well related to the building that is used for the business or attraction; and</p> <p>b) there will be no adverse individual, cumulative, or sequential impact on landscape character and local distinctiveness of the locality; and</p> <p>c) d) the size, scale, colour and siting are appropriate and the materials and design are of a high standard which conserve or enhance the character and appearance of the area.</p> <p>2. The proposal should have no detrimental impact on public safety.</p> <p>3. Opportunities to enhance existing buildings or the landscape through consolidating, redesigning or removing existing advertisements / signage will be encouraged.</p>	Points of clarification	No –only minor policy formatting changes proposed.
MM18	77-78	Para. 4180	<p>MINERALS SAFEGUARDING AREAS</p> <p>In accordance with Government policy¹⁶⁴, the National Park Authority has not defined Minerals Safeguarding Areas¹⁵¹, which are known locations of specific minerals resources of local and national importance, and are identified to ensure that they are not needlessly sterilised by non-mineral development, whilst not creating a presumption that resources defined will be worked. However, there is no presumption that applications to extract the mineral resources defined in Minerals Safeguarding Areas will be granted permission. Neither does a Minerals Safeguarding Area automatically preclude other forms of development. What it does, is draw attention to the presence of important mineral resources and make sure that they are adequately and effectively considered in</p>	Text modified to reflect the proposed deletion of Policy CE-S8 (see below).	As for MM19 below, the appraisal of Policy CE-S8 has been removed from the SA.

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			land-use planning decisions. Within the National Park the safeguarded minerals are sources of <u>the local resource of building stone as are identified in the Building Stone Atlas of Somerset and Exmoor^{T52} and include consist of a large number of small derelict building stone quarries. While a few of these derelict quarries may retain the appearance of a quarry, many others will have been reclaimed by vegetation or in-filled.</u> Policy CE-S8 will be applied in all decisions where an application for non-mineral development is proposed within defined Minerals Safeguarding Areas (see Map 4.3). <u>In the National Park, the need for minerals safeguarding is not considered to be as significant as it is in locations with higher expectations of mineral working and general development. Since new development in the National Park is extremely limited and the demand for local building stone is low, there is very little risk of sterilising the available mineral resource given the extent of the resource across the National Park.</u>		
MM19	78	Policy CE-S8	CE-S8 MINERAL SAFEGUARDING AREAS 1. Development proposals for non-mineral development within minerals safeguarding areas will be permitted where it will not compromise the future extraction of important building stone at existing or former quarries unless: a) the mineral can be extracted satisfactorily prior to the development taking place; or b) the development is of a temporary nature, can be completed and the site restored to a condition that does not inhibit extraction within the timescale that the mineral is likely to be needed; or c) there is an overriding need for the development.	Policy proposed to be deleted since the demand for local building stone is low, there is very little risk of sterilising the available building stone resource given the extent across the National Park.	Appraisal of policy removed from SA report.
MM20	79	Policy CE-S9	CE-S9 MAJOR MINERAL EXTRACTION DEVELOPMENT 1. Proposals for large-scale mineral extraction development, other than that permitted by policies CE-S7 and CE-D7, will not be permitted in the National Park unless in exceptional circumstances. Such proposals will be considered against the major development tests set out in policy GP2: major development, and should be and where they are demonstrated to be in the public interest before being allowed to proceed in accordance with the tests set out in policy GP2 Major Development. 2. If the tests for major development are met, the development and all restoration will be subject to a planning obligation to ensure:	Modifications to ensure the policy has regard to all types of mineral development in the National Park (other than the small-scale extraction of building stone CE-S7).	No – the overall policy aims remain the same despite some policy wording changes.

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			<ul style="list-style-type: none"> a) the development should be carried out to high environmental standards and respond to the local landscape character including its natural topography; b) ensure that any unavoidable noise, dust and particle emissions and any blasting vibrations are controlled, mitigated or removed at source, and establish appropriate noise limits for extraction in proximity to noise sensitive properties; c) any waste materials from extraction <u>the mineral development</u> will be re-used or recycled <u>consistent with CC-S6 Waste</u>; and d) a scheme for restoration and after-use of the site should be submitted with the application to ensure it will be carried out to high environmental standards based upon conservation and enhancement of landscape character, geodiversity and biodiversity, and the historic environment. 		
MM21	79	Policy CE-D7	<p>CE-D7 INTERIM DEVELOPMENT ORDER PERMISSIONS</p> <p>1. Interim Development Order permissions will be subject to an environmental impact assessment that will determine a set of comprehensive conditions in order to mitigate and control any adverse impact on the National Park's landscape, wildlife, geodiversity, cultural heritage, other special qualities, its enjoyment, or <u>the health and amenity of local communities, of Exmoor</u> and to ensure satisfactory restoration and after-care of the site. Particular regard will be paid to:</p> <ul style="list-style-type: none"> a) the visual impact on the landscape; b) the potential effect on ecological, archaeological and historical features; c) the potential effect on the amenity of local communities or visitors in terms of noise, disturbance, and pollution (including light and dust) and the quiet enjoyment of the National Park; d) the potential impact on the recreational use of the area; e) hours of operation; and f) access, traffic generation and highway safety. 	Proposed modification to ensure consistency with the policy criteria in CE-S7.	No –only minor policy wording changes proposed.
SECTION 5: RESPONDING TO CLIMATE CHANGE AND MANAGING RESOURCES					
MM22	89	Policy CC-S2	<p>CC-S2 COASTAL DEVELOPMENT</p> <p>1. Proposals for development should avoid areas at risk from coastal change,</p>	Modification to include cross-reference to	No –only minor policy wording changes

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			<p>ensure they are compatible with the latest Shoreline Management Plan and available coastal vulnerability data, and where necessary undertake a vulnerability assessment. Development that would increase the risk of coastal erosion will not be permitted.</p> <p>2. Development will be permitted at the coast only where it has been demonstrated that it:</p> <ul style="list-style-type: none"> a) is located in a named settlement (GP3) or requires a coastal location; b) is not within an area identified at risk of coastal change including Coastal Change Management Areas unless it is essential infrastructure or sea defences which clearly require such a location and there are no alternative solutions; c) is appropriate to the setting and character of the coastline (CE-S1, CE-D1) and does not adversely affect coastal interests including coastal biodiversity and heritage assets; and d) does not increase risk to life or property, or affect the natural coastal processes at any part of the coastline both within and outside of the National Park. 	policy CE-D1.	proposed.
MM23	102	Policy CC-S5	<p>CC-S5 LOW CARBON AND RENEWABLE ENERGY DEVELOPMENT</p> <p>1. Development proposals for small scale renewable energy schemes that assist in contributing towards reducing greenhouse gas emissions and moving towards a carbon neutral National Park will be supported supported permitted where they:</p> <ul style="list-style-type: none"> a) contribute towards meeting domestic, community or business energy needs within the National Park; b) are compatible with the landscape and seascape character of the locality and avoid the most sensitive landscapes; c) do not compromise the natural beauty, wildlife, cultural heritage or historic environment of the National Park, or lessen the enjoyment of its special qualities, either on their own, or in a combination with other schemes; d) do not adversely affect habitat quality or the maintenance of wildlife populations; e) provide environmental enhancement or community benefits wherever possible; 	Points of clarification.	No –only minor policy wording changes proposed.

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			<p>f) conserve the amenity of the area including in relation to landscape and visual impact, tranquillity, access and recreation, air and water quality, noise, dust, odour and traffic generation; and</p> <p>g) make provision for the removal of the facilities and reinstatement of the site, should it cease to be operational.</p> <p>2. <u>Proposals for large-scale, commercial renewable energy development that do not meet the criteria in (1) above, will not be permitted.</u></p>		
MM24	103	Para. 5.98	<p>In order to judge whether the potential impacts of a proposal are likely to be acceptable, applicants should consider the impacts of the wind turbine along with any required infrastructure, such as road access, on site-tracks, turbine foundations, hard standings, anemometer masts, a construction compound, electrical cabling and an electrical sub-station and control building. Some of these features are permanent and others are required only in the construction phase and as such are temporary. Applications should include any necessary supporting information regarding the assessment of impacts on landscape, wildlife, cultural heritage, historic environment and other resources as set out under the issues to be considered in proposals for renewable energy development (CC-S5) paragraphs 5.65 to 5.94. <u>Applicants will be expected to demonstrate that, following consultation, the planning impacts identified by affected local communities and 'communities of interest' such as users of the National Park have been fully addressed and therefore the proposal has their backing^x. Proposals within any areas of search allocated in a Neighbourhood Plan will be considered to have the backing of that local community.</u></p> <p><i>Insert footnote:</i></p> <p>^x <u>House of Commons (2015) Written Statement (HCWS42) made by Secretary of State for Communities and Local Government on 18 June 2015. Local Planning (wind energy development)</u></p>	To comply with the Written Ministerial Statement on wind energy development 18 June 2015	No –additional supportive text provided to expand on community consultation
MM25	104	Policy CC-D3	CC-D3 SMALL SCALE WIND TURBINES	To comply with the	No –amended text

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			<p>1. Proposals for individual wind turbines serving individual properties of groups of properties will only be permitted where they are small scale and:</p> <p>a) <u>they are sited within suitable areas of the National Park, excluding Landscape Character Types A: High Coastal Heaths and D: Open Moorland as shown on the Policies Map;</u></p> <p>b) a) <u>they are</u> appropriate in scale to the property being served, with a maximum height of 20m to rotor tip;</p> <p>c) b) there is no unacceptable landscape or visual impact including cumulative impacts; and any residual impacts are minimised by locating the turbine close to any associated development or features and by screening and colour of the turbine;</p> <p>d) c) there is no unacceptable adverse impact on tranquillity or amenity including the effects of shadow flicker and noise on nearby properties or access routes;</p> <p>e) d) the location does not conflict with the use of the area for recreation and access, and public safety is not compromised; and</p> <p>f) e) access to the site for construction and maintenance can be provided without damage to rural roads or historic bridges and fords.</p>	Written Ministerial Statement on wind energy development 18 June 2015	relates to landscape which was previously addressed.
MM26	105	Policy CC-D4	<p>CC-D4 FREESTANDING SOLAR ARRAYS</p> <p>1. Small scale freestanding solar arrays to serve the needs of individual properties, groups of properties, community buildings such as village halls, agricultural properties or other businesses will be permitted where:</p> <p>a) <u>they are sited within suitable areas of the National Park, excluding Landscape Character Types A: High Coastal Heaths and D: Open Moorland as shown on the Policies Map;</u></p> <p>b) they are appropriate in scale and in proportion to the size of the property they are intended to serve;</p> <p>c) they are suitably sited and screened to avoid any intrusive visual or landscape impact, and where they are clearly associated with the buildings or properties that they are intended to serve;</p> <p>d) they are sensitively sited to avoid impacts on wildlife and land of high ecological interest;</p> <p>e) the design, colour and choice of materials minimises any visual impact; and</p> <p>f) they do not detract from the <u>harm the significance and setting of listed</u></p>	For consistency with proposed modification to Policy CC-D3 (above).	No – amended text relates to landscape which was previously addressed.

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			<p>buildings or other heritage assets, or cause damage to archaeological interests.</p> <p>2. Proposals for ground mounted solar arrays that are sited in isolation away from existing built forms will not be permitted.</p>		
MM27	113	Policy CC-D5	<p>CC-D5 SEWERAGE CAPACITY AND SEWAGE DISPOSAL</p> <p>1. Development proposals for, or which require new or extended sewerage infrastructure, will be permitted where it can be demonstrated that the facility will pose no unacceptable harm to public health, amenity or environmental quality. The following criteria must also be satisfied:</p> <p>a) the appropriate location, scale and design of the infrastructure (CE-S6);</p> <p>b) the use of necessary mitigation measures (including climate change resilience measures), to avoid impacts on surrounding areas including noise, air, soil and water pollution, odour, litter, visual intrusion, and other disturbances; and</p> <p>c) connection to a public mains sewer, where available and physically possible. Where existing capacity is insufficient, proposals should contribute to an integrated and adequate network of this is not the case, proposals for non- mains sewerage should first consider a combined sewage treatment system installation, sufficient to meet the needs of existing and proposed development, or if this is not feasible, a system incorporating septic tank(s). Proposals which require non-mains sewerage must demonstrate that the proposal cannot be connected to a public mains sewer.</p> <p>2. Satisfactory arrangements should be made to ensure the public sewerage infrastructure can appropriately manage the additional required capacity of the proposal before the development is occupied or activated.</p> <p>3. Development proposals which exceed the capacity of private sewerage infrastructure or which do not otherwise include satisfactory arrangements consistent with the requirements of this policy will not be permitted. For development proposals that require new or extended private sewerage infrastructure, this must be provided before the development is occupied or activated to ensure current sewerage capacity is not exceeded.</p> <p>4. Regularly occupied development such as residential buildings will not be permitted in locations likely to be unacceptably affected by the proximity of sewerage infrastructure.</p>	To ensure that the policy intention is clear with regard to non-mains sewerage systems.	No –minor changes to policy wording

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SECTION 6: ACHIEVING A THRIVING COMMUNITY					
MM28	132	Policy HC-S1	<p>HC-S1 HOUSING</p> <p>1. The purpose of housing development will be to address the housing needs of local communities. The principal community identified need is for affordable housing with local occupancy ties. Exceptionally, new housing <u>development</u> will be <u>acceptable permitted</u> where it addresses an identified local housing need for:</p> <p>a) a Affordable homes that remain affordable in perpetuity and which will be occupied by local persons in proven housing need in accordance with the local occupancy definition in HC-S3;</p> <p>b) <u>Homes for rural workers in agriculture, forestry or other rural land based enterprises with a proven essential, functional need in accordance with HC-D7 or HC-D8 and HC-D9 or to enable succession farming on established farm businesses in accordance with HC-D7 or HC-D8 and HC-D10;</u></p> <p>c) specialist housing for older people and other vulnerable members of the community, in accordance with HC-D3 which will be occupied by local persons in perpetuity; or</p> <p>c) d) a An <u>“Extended Family dwelling”</u>, in accordance with HC-D4, which will be occupied by local persons in perpetuity.</p> <p>2. <u>Accessible and adaptable housing for older people and other vulnerable members of the community will be permitted where:</u></p> <p><u>a) it meets an identified need for accessible and adaptable affordable housing in accordance with clause 1(a) above; or</u></p> <p><u>b) it will cross-subsidise at least two units of local need affordable housing, as part of a wider new-build housing development, or will cross-subsidise at least one unit of local need affordable housing as part of a wider housing conversion scheme (HC-S2, HC-D3).</u></p> <p>3. 2. Consistent with an exceptions approach to housing, provision will not be made for housing solely to meet open market demand and housing land will not be allocated in the development plan. 3. <u>“Principal Residence” market housing will only be considered permitted where;</u></p>	<p>Clause 1: points of clarification.</p> <p>Clause 2: new clause to reflect the change in terminology introduced by the Government’s introduction of new Technical Housing Standards</p> <p>Clauses 3 & 4: to reflect planning practice guidance (PPG) in relation to vacant building credit.</p>	<p>Yes – proposed changes are likely to result in more accessible and adaptable housing and is likely to help meet local housing needs for older and more vulnerable people.</p>

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			<p>a) it is essential to deliver an identified need for local need affordable housing in a Local Service Centre or Village to meet an essential need and it accords and in accordance with Policy HC-S4; or</p> <p>b) the proposal relates to a Vacant Building in a Local Service Centre or Village (HC-Dx).</p> <p>4. 'Principal residence' market housing Clause 3 b) above and Policy HC-Dx of this Plan will only be considered apply as long as government guidance on planning obligations relating to thresholds for affordable housing vacant buildings credit is extant;. If the guidance changes, policy HC-Dx and clause 3 b) above will be reviewed.</p> <p>a) through the change of use of existing buildings or the redevelopment of a 'vacant building' (including provisions for commuted sums towards local needs affordable housing in the National Park); and</p> <p>b) only within Local Service Centres and Villages.</p> <p>If the guidance changes, this provision will no longer apply and 100% affordable housing will be sought.</p>		
MM29	133	Text Box	<p>Text Box</p> <p>Government guidance on planning obligations, inserted into the PPG, is in force at the time of the drafting of this Local Plan. It sets out minimum thresholds for the size of housing developments where affordable housing can be sought and introduces a vacant buildings credit. The thresholds for National Parks can be set at 5 dwellings or fewer. The guidance is clear that rural exceptions sites are excluded from this change.</p> <p>While this guidance is in force only, as a variation to HC-D1, applicants will be able to change the use of existing non-residential buildings or redevelop vacant buildings to dwellings in Local Service Centres or Villages (see Policy GP3). In such cases the</p>	Text box deleted to reflect judgement on R (on the application of West Berkshire District Council and Reading Borough Council) v Secretary of State for Communities and Local Government [2015] - that the	No – this change does not affect any of the SA scores.

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			<p>following thresholds will apply:</p> <ul style="list-style-type: none"> • where the existing building is only able to accommodate up to 5 dwelling units or fewer, and/or have a maximum combined gross floorspace not exceeding 500m²; or • where the existing building is only able to accommodate between 6 and 10 dwelling units, and/or have a maximum combined gross floorspace not exceeding 1000m². From units 6-10, the National Park Authority will expect that a financial contribution will be provided towards the provision of local needs affordable housing in the National Park. • where the existing building is able to accommodate 11 dwelling units (or more), and/or has a maximum combined gross floorspace greater than 1000m², the National Park Authority will expect any housing to be on-site and for units 11 and above to meet a local affordable need in accordance with Policy HC-D4. <p>The guidance also applies to the change of use or redevelopment of non-residential vacant buildings to housing under the 'vacant buildings credit'. The guidance specifies that the gross floorspace of housing achieved through the demolition of an existing vacant building and its redevelopment for housing should be no greater than the existing gross floorspace of the existing vacant buildings. Housing which would exceed the gross floorspace will be expected to address an identified local need (clause 1 of HC-D2);</p> <p>In all these cases, new housing whether through the change of use of an existing building or the redevelopment of a vacant building will be expected to be principal residence housing (see HC-S4) and be in line with HC-S2. Changes of use to housing should also accord with CE-S5 and conditions will be attached to planning permissions to remove permitted development rights (see HC-S2 and CE-S5).</p>	evidence and local circumstances justify the proposed approach in the Local Plan and the thresholds for affordable housing in the PPG do not apply.	
MM30	133	Policy HC-DX (to be inserted after policy HC-S1)	<p>POLICY HC-DX VACANT BUILDINGS IN SETTLEMENTS</p> <p>1. <u>Exceptionally, Principal Residence market housing may be permitted through the change of use or redevelopment of an existing Vacant Building where:</u></p> <p>a) <u>the proposal accords with Policy HC-S1 clause 3 b) and 4;</u></p> <p>b) <u>sufficient evidence is provided to demonstrate that the building can be considered to be Vacant through meeting the following tests:</u></p> <p>i) <u>it is not abandoned;</u></p> <p>ii) <u>it has been unoccupied, without content and has been marketed for a minimum of 3 years;</u></p>	To reflect planning practice guidance (PPG) in relation to vacant building credit in the context of the approach to housing in the National Park.	Yes- new policy added to SA report and appraised.

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			<ul style="list-style-type: none"> iii) <u>it is not an agricultural building or previously developed land without a building;</u> iv) <u>it can be demonstrated that the building has not been made vacant for the sole purpose of re-development and there has been no intent to leave the building empty or cause it to become empty in order to circumvent affordable housing requirements. Extant or recently expired planning permissions applying to the building for the same or similar development will be taken into account in considering proposals;</u> v) <u>the building is within a Local Service Centre or Village; and</u> vi) <u>clear and robust evidence demonstrates that no affordable housing can be provided on site or as part of the development for viability reasons. In such cases, provision for a commuted sum towards local need affordable housing in the National Park will be sought commensurate with an agreed and robust viability assessment.</u> <p>2. <u>Proposals for the change of use of a Vacant Building to Principal Residence market housing will only be permitted where:</u></p> <ul style="list-style-type: none"> a) <u>the existing building is able to accommodate two or more dwelling units of 93sqm floorspace in size (HC-D1);</u> b) <u>the existing building(s) is considered to be worthy of conservation and it does not have an adverse impact on the character and visual amenity of the area; and</u> c) <u>they will accord with CE-S5.</u> <p>3. <u>Proposals for the redevelopment of a Vacant Building for Principal Residence market housing will only be permitted where:</u></p> <ul style="list-style-type: none"> a) <u>the existing building is not a traditional building, is not listed or considered to be of historic or architectural importance worthy of conservation and it has an adverse impact on the character and visual amenity of the area;</u> b) <u>the redevelopment proposal will achieve demonstrable environmental enhancement of the building and its locality; and</u> c) <u>the gross floorspace of the Principal Residence housing achieved will be no greater than the existing gross floorspace of the existing Vacant Building(s). Housing which would exceed the gross floorspace will be required to meet an identified local affordable need in accordance with Plan</u> 		

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			<u>policies.</u>		
MM31	135	Policy HC-S2	<p>HC-S2 A BALANCED LOCAL HOUSING STOCK</p> <ol style="list-style-type: none"> 1. Having regard to the existing housing stock in the locality, A all new residential development will contribute towards the creation of sustainable, balanced, <u>and inclusive Exmoor communities by ensuring a mix of dwellings (in terms of size, type and tenure), providing housing that addresses that will meet the local needs of present and future generations, through:</u> <ol style="list-style-type: none"> a) Hhaving regard to the existing housing stock in the locality, ensuring that new housing provision will, through the mix of new dwellings in terms of size, type and tenure, meet the needs of Exmoor's communities, and 2. <u>New housing will offer a good standard of accommodation by being constructed to be neither too large nor too small and using flexible standards that enable dwellings to be adapted to the needs of people over their lifetime.</u> 3. <u>All new build housing developments will be encouraged to be constructed in accordance with Building Regulations Requirement M4(2) for accessible and adaptable dwellings or successor regulations. In new build developments of 5 or more dwellings, a minimum of 20% will be required to meet this standard.</u> 4. <u>Wheelchair user dwellings will be encouraged to be constructed in accordance with Building Regulations Requirement M4(3) (or successor regulations) and will be encouraged where a specific local need for a wheelchair adaptable or accessible dwelling is identified.</u> 5. b) For local need affordable dwellings permitted under HC-S1 and HC-D1, or HC-D2, HC-D5, HC-D6, or HC-D7, the dwelling(s) will be affordable by size and type to local people and will remain so in perpetuity. 6. For private owner-occupied local need <u>affordable dwellings, including custom/self-build (HC-D5), specialist accessible and adaptable housing for Exmoor's communities (HC-D3), 'eExtended Family dwellings' (HC-D4) and 'eSuccession Farm dDwellings' (HC-D10), the net floorspace gross internal area will be 90 93 square metres or less.</u> 7. <u>For local need affordable housing controlled through a Registered Provider, a gross internal area greater than 93 square metres may be permitted only where there is a proven need for a larger dwelling.</u> 8. e) Where permission is granted for: <ol style="list-style-type: none"> a) dwellings of up to 90 93sqm, including those created through subdivisions; a condition will be attached removing permitted 	<p>To reflect the change to the PPG introduced by the Government's introduction of new Technical Housing Standards.</p> <p>Other points of clarification regarding dwelling size.</p>	No - changes to policy wording have already been taken into account in scoring.

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			<p>development rights in respect of extensions; <u>or</u></p> <p>b) dwellings created through subdivisions (HC-D14) (including those up to 93sqm) a condition may be attached removing permitted development rights in respect of extensions to ensure that dwellings do not exceed 90sqm in size.</p> <p>9. Where permission is granted for employment uses as part of a proposal, a condition may be attached tying the occupation of the dwelling to the operation of the business <u>space</u>.</p>		
MM32	139	Policy HC-S3	<p>HC-S3 LOCAL OCCUPANCY CRITERIA FOR AFFORDABLE HOUSING</p> <p>1. New local need affordable housing will be occupied by a person(s) (and their dependents) with a proven housing need who cannot afford (to rent or buy) accommodation in the locality and who meets one or more of the following definitions:</p> <p>a) has a minimum period of 10 years permanent residence in the parish or an adjoining parish and who is forming an independent household or is currently homeless or living in otherwise unsatisfactory accommodation;</p> <p>b) has a minimum period of a total of 10 years permanent residence within parishes within the National Park and who can demonstrate a clear link with a parish or its adjoining parish and is forming an independent household or is currently homeless or living in otherwise unsatisfactory accommodation;</p> <p>c) is not now resident in the parish or an adjoining parish but with a local connection with the parish including a period of permanent residence of 10 years or more within the last 30 years;</p> <p>d) has an essential need to live close to another person who has a minimum of 10 years permanent and continuous residence in the parish or an adjoining parish, the essential need arising from proven age or medical reasons; or</p> <p>e) needs to live close to their place of work or meets the requirements of an Exmoor worker in the parish or an adjoining parish.</p> <p>i) carries out paid work which is of value to the National Park and its communities; and</p> <p>ii) needs to live in the parish or adjoining parish in order to</p>	To ensure the policy includes the criteria for a 'work' connection, and the cascade criteria for vacant local affordable dwellings.	Yes- addition of policy wording in relation to providing affordable housing for local workforce has changed SA scoring.

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			<p><u>carry out that work effectively.</u></p> <p>A planning obligation will be secured to ensure that occupancy of the dwelling(s) is confined to persons in local <u>affordable</u> housing need in perpetuity.</p> <p><u>3.</u> The definition of local <u>affordable</u> need shall initially be based on <u>criteria criterion 1</u> above. Where there are no local people meeting <u>criteria criterion 1</u> and properties are vacant, a cascade approach will apply and the planning obligation will allow <u>the dwelling to be occupied by:</u></p> <p>a) other local persons with a minimum period of 5 years permanent and continuous residence in the parish or an adjoining parish to qualify;</p> <p><u>b)</u> Where properties become vacant and there is no-one meeting criteria 1 above, or the 5 year residency qualification, the final stage of the cascade will allow other local persons with strong local ties living in the relevant district council area of the National Park; and</p> <p><u>c)</u> where there is no-one living in the relevant district council area of the National Park, other local persons with strong local ties living in the National Park as a whole.</p> <p><u>4.</u> 3.b) will ensure for privately owned dwellings, that the planning obligation will ensure that the occupancy cascade will not go wider than the National Park area unless for those subsequent occupants who qualify under clauses 1(c), 1(d) or 1(e) above; or.</p> <p><u>5.</u> 3.a) For dwelling(s) owned or controlled by a registered provider (including housing associations) the planning obligation will ensure that the dwelling may be occupied by other local persons with strong local ties to the remaining District Council area outside the National Park; or</p>		
MM33	140	Policy HC-S4	<p>HC-S4 PRINCIPAL RESIDENCE HOUSING</p> <p>1. Any <u>new market housing development</u> will be '<u>Principal Residence</u>' housing and will only be permitted, through the change of use of non-residential buildings to housing in settlements, and/or <u>where it is required to enable the delivery of affordable housing to meet local needs in accordance with policy HC-S1 (Housing),</u></p>	Points of clarification and consistency with other proposed main modifications.	No –minor changes to policy wording

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			<p>clause 3 a) or b) and in accordance with:</p> <p>a) HC-D1 (conversions to dwellings in settlements);</p> <p>b) HC-D2 (new build dwellings in settlements);</p> <p><u>c) HC-D3 (Accessible and Adaptable housing for Exmoor's Communities)</u></p> <p>d)-e) RT-D3 (safeguarding serviced accommodation) and HC-D6 (the change of use of serviced accommodation to housing); or</p> <p>e) d) HC-D14 (subdivisions of existing dwellings).</p> <p>2. <u>Where permission is granted for a Principal Residence market dwelling, a condition will be attached to ensure that the occupancy of the dwelling(s) is confined to a person's sole or principal residence.</u></p>		
MM34	143	Policy HC-D1	<p>HC-D1 CONVERSIONS TO DWELLINGS IN SETTLEMENTS</p> <p>1. Within the named settlements, the change of use of a non-residential building(s) to a dwelling(s) will be permitted where: a) the building is well related to existing buildings, and the proposal conserves or enhances the character of the settlement and accords with CE-S5; and where; b) the proposal meets the requirements of CE-S5;</p> <p>a) there is a proven local need for the dwelling(s) which will meet an affordable local need, and the intended occupants meet the requirements of the local need occupancy criteria which will be secured in perpetuity through a planning obligation in accordance with HC-S3; and</p> <p>b) d) the dwelling(s) will be affordable by size and type to local people and will remain so in perpetuity in accordance with HC-S2.</p> <p>2. Proposals for 'extended family dwellings, will accord with criteria 1 (a) and (b) above, be occupied by a person who meets the definition of 'extended family' and be in accordance with HC-D4.</p> <p>3. The intention will remain the provision of 100% local need affordable housing to meet an identified local need and the change of use of a non-residential building to residential will address an identified local affordable need unless, Where the building is able to accommodate more than one dwelling unit, and an element of Principal Residence housing is proposed, the following tests will also apply:</p> <p>a) it is an element of principal residence market housing in accordance</p>	<p>To simplify the policy and avoid repetition through reducing the number of clauses.</p> <p>To ensure the policy is consistent with proposed main modifications in other housing policies.</p>	No - minor changes to policy wording

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			<p>with HC-S4;</p> <p>a) b) it is clearly and robustly demonstrated that it <u>an element of Principal Residence market housing (HC-S4)</u> is required to enable delivery of <u>local need affordable housing (HC-S3)</u> which cannot be made financially viable without it;</p> <p>c) the building is able to accommodate more than one dwelling unit;</p> <p>b) d) it is within a <u>Local Service Centre or a Village named settlement</u> (GP3);</p> <p>c) e) it is the minimum number of <u>pPrincipal rResidence market houses dwellings</u> required to support the delivery of the required affordable housing to <u>and will</u> maximise the proportion of affordable homes within viability constraints;</p> <p>f) the affordable dwellings will be occupied by a person(s) with a proven housing need in accordance with HC-S3;</p> <p>d) g) in terms of size and type, the <u>affordable housing and mix of pPrincipal rResidence market housing</u>; is in accordance with Policy HC-S2;</p> <p>e) h) the affordable housing and <u>pPrincipal rResidence market housing</u> will be indistinguishable and will be fully integrated on the development site; and</p> <p>f) i) the affordable housing will be provided broadly in-step with the <u>pPrincipal rResidence housing</u> as development progresses; <u>or unless</u></p> <p>g) <u>the building is in a Local Service Centre or Village, it is accepted to be Vacant and proposed Principal Residence housing through the change of use of a Vacant Building(s) accords with HC-S1 clauses 3b) and 4 and Policy HC-Dx.</u></p> <p>j) it is 'Principal Residence' housing in accordance with HC-S1 clause 4.</p> <p>3. 4. The National Park Authority will ensure that, whether through a single permission or incremental permissions, the number of affordable dwellings created is that which would have been required if the scheme had been constructed as a single development having regard to the planning unit and previous permissions since the adoption of the March 2005 Local Plan. In the case of the creation of one or more dwellings from a single previous planning unit (whether at once or over a period of time), the development should contribute the maximum number of local need affordable homes consistent with this policy. or in accordance with HC-S1, clause 4.</p> <p>4. 5. Where there is reason to believe that the proposal is formulated with a view</p>		

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			<p>to circumventing or mitigating affordable housing requirements, including where the National Park Authority considers that a building is able to accommodate more than one dwelling units, its capacity will be re-calculated.</p> <p>5. 6. Where a scheme would provide more affordable homes than are needed in the parish and the adjacent parishes, now and in the near future a financial contribution will be required towards affordable housing needed elsewhere in the National Park in accordance with Policy GP5.</p> <p>6. 7. Proposals for <u>accessible and adaptable</u> specialist housing will be permitted where they accord with HC-D3S1.</p> <p>8. Where permission is granted condition(s) will be attached removing permitted development rights in accordance with HC-S2 and CE-S5.</p>		
MM35	146	Policy HC-D2	<p>HC-D2 NEW BUILD DWELLINGS IN SETTLEMENTS</p> <p>1. New build housing development will be permitted in named settlements where:</p> <p>a) the site is well related to existing buildings and any development would conserve or enhance the character of the traditional settlement pattern and the character and appearance of the site and its surroundings; <u>and</u></p> <p>a) <u>b)</u> it will meet an affordable local need; <u>and</u> there is a proven local need for the dwelling(s) <u>and</u> that need cannot be met within the existing housing stock, or from sites/buildings already with planning permission;</p> <p>b) <u>c)</u> the intended occupants meet the requirements of the local need occupancy criteria <u>requirements which will be secured in perpetuity through a planning obligation</u> in accordance with HC-S3; and</p> <p>c) <u>d)</u> the dwelling(s) will be affordable by size and type to local people and will remain so in perpetuity in accordance with HC-S2; <u>;</u></p> <p>2. All new build housing must address an identified local need and be affordable with occupation restricted to local people in perpetuity unless, in the named Local Service Centres and Villages, where: a) F for reasons of financial viability, ENPA is satisfied that it can be clearly and robustly demonstrated that:</p> <p>a) i) <u>ii)</u> An element of pPrincipal rResidence market housing (HC-S4) is required to enable delivery of <u>more than one unit of local need</u> affordable housing which cannot be made financially viable without it. <u>The affordable housing will be owned or controlled by a Registered Provider (including Housing Associations) or a community land trust.</u> The intention will remain the provision of 100% affordable housing to meet an identified local need.</p> <p>b) ii) <u>iii)</u> It is the minimum number of pPrincipal rResidence houses required to</p>	<p>To simplify the policy and avoid repetition through reducing the number of clauses and to ensure the policy is consistent with proposed main modifications in other housing policies.</p> <p>Clause 2.a): Clarification to ensure that cross-subsidy by Principal Residence housing will enable the delivery of more than one unit of local need affordable housing – as proposals for single new build dwellings in</p>	<p>No – changes to wording do not remove the original meaning of the policy.</p>

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			<p>support the delivery of the required affordable housing.</p> <p>iii) The affordable dwellings will be occupied by a person(s) with a proven housing need in accordance with the local occupancy definition in HC-S3 and will otherwise accord with this Policy.</p> <p>c) iv) In terms of size and type, the affordable housing and mix of pPrincipal rResidence market housing is in accordance with HC-S2;</p> <p>d) v) The affordable housing and pPrincipal rResidence housing are indistinguishable and fully integrated on the development site; and</p> <p>e) vi) The affordable housing will be provided broadly in-step with the pPrincipal rResidence housing as development progresses;</p> <p>or-unless</p> <p>f) the building is in a Local Service Centre or Village, is accepted to be Vacant and proposed Principal Residence housing through the redevelopment of a Vacant Building(s) will be in accordance with HC-S1 clauses 3b) and 4 and Policy HC-Dx.</p> <p>f) It is 'Principal Residence' housing through the redevelopment of a 'Vacant Building(s)' in accordance with HC-S1 clause 4 only. In such cases, for a building to be considered as Vacant, applicants will need to demonstrate that it is not abandoned and that it has been unoccupied and without content for a minimum of 3 years.</p> <p>3. Proposals for specialist <u>accessible and adaptable</u> housing will be permitted where they accord with HC-D3S1.</p> <p>4. Where permission is granted for local need or '<u>principal residence</u>' dwellings or specialist <u>adaptable and accessible</u> housing of up to 90 93sqm floorspace, a condition will be attached removing permitted development rights in accordance with HC-S2.</p>	<p>settlements will only be permitted where the dwelling meets a local need for affordable housing and does not require cross-subsidy – consistent with Policy HC-D5 Custom / Self Build Local Need Housing. This equates to what would have been required by the original Publication Draft Local Plan policy but ensures the intention of this clause is clear.</p> <p>Modification to clause 2.a) to delete reference to 'housing owned or controlled by a Registered Provider or a community land trust' to ensure there is sufficient flexibility to enable the delivery of affordable housing.</p>	
MM36	150	Policy HC-D3	HC-D3 ACCESSIBLE AND ADAPTABLE SPECIALIST HOUSING FOR EXMOOR'S	To reflect the change to the PPG introduced	No – changes to wording do not

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			<p>COMMUNITIES</p> <p>1. Proposals which address an identified local need or requirement for specialist housing accessible and adaptable homes for older people and/or other vulnerable members of the community who have an established local connection, and require care and assistance homes that can be adapted to meet their needs over their lifetime, will be encouraged, permitted where:</p> <p>a) it cannot be provided within the existing housing stock, including through the appropriate subdivision and adaptation of existing dwellings in accordance with HC-D14 or from sites/buildings already with planning permission;</p> <p>2. b) Proposals for will be permitted where:</p> <p>a) they are in accordance with clause 2 of HC-S1, more than one dwelling unit of local needs affordable housing and any principal residence market housing provide for an identified need or requirement for specialist housing permitted in accordance with HC-D1 or HC-D2; and where and with HC-D1 or HC-D2 as appropriate.</p> <p>b) the dwelling size is in accords with HC-S2;</p> <p>c) i) they will be integrated into the local community to enable access to required services and facilities;</p> <p>d) they are constructed in accordance with Building Regulations Requirement M4(2) (accessible and adaptable dwellings) or M4(3) (wheelchair user dwellings) regulations and they accord with Policy HC-S2, clauses 3 or 4 as appropriate; and</p> <p>ii) it is built to standards and to a size in accordance with HC-S2; and</p> <p>e) iii) subdivision, adaptation or conversion work accords with CE-S5.</p> <p>3. A planning obligation will be secured to ensure that the occupancy of specialist accessible and adaptable housing is confined in perpetuity to a local person (and their dependents) who has a minimum period of a total of 10 years permanent residence within parishes in the National Park and where permission is granted, a Principal Residence Occupancy condition will be attached in accordance with HC-S4.</p> <p>4. Where permission is granted a condition will be attached removing permitted development rights in accordance with HC-S2.</p> <p>The planning obligation will allow, where properties become vacant, and where no person in need of specialist housing, can be found to occupy a</p>	by the Government's introduction of new Technical Housing Standards.	remove the original meaning of the policy.

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			<p>property, other persons with a local affordable housing need consistent with HC-S3 to occupy the dwelling.</p> <p>5. The provision of specialist accommodation offering care and assistance through a residential institution, should be in accordance with HC-S7.</p>		
MM37	154	Policy HC-D6	<p>HC-D6 THE CHANGE OF USE OF SERVICED ACCOMMODATION TO HOUSING</p> <p>1. Proposals for the change of use of serviced accommodation to dwelling(s) will only be considered where the requirements in RT-D3 are satisfied. The intention, through the change of use will remain the provision of 100% affordable housing to meet an identified local need.</p> <p>2. In the Local Service Centres and Villages, proposals will accord with HC-D4.</p> <p>3. Outside the Local Service Centres and Villages, an element of principal residence market housing in accordance with HC-S4 may only be permitted where:</p> <p style="margin-left: 20px;">a) the proposal meets the requirements of CE-S5;</p> <p style="margin-left: 20px;">b) it is clearly and robustly demonstrated that it is required to enable delivery of affordable housing which cannot be made financially viable without it;</p> <p style="margin-left: 20px;">c) the building is able to accommodate more than one dwelling unit;</p> <p style="margin-left: 20px;">d) it is the minimum number of principal residence market houses required to support the delivery of the required affordable housing and to maximise the proportion of affordable homes within viability constraints;</p> <p style="margin-left: 20px;">d) the affordable dwellings will be occupied by a person(s) with a proven housing need in accordance with HC-S3;</p> <p style="margin-left: 20px;">e) in terms of size and type, the affordable dwellings and the mix of principal residence market housing is in accordance with HC-S2;</p> <p style="margin-left: 20px;">f) the affordable housing and principal residence market housing will be indistinguishable and will be fully integrated on the development site; and</p> <p style="margin-left: 20px;">g) the affordable housing will be provided broadly in-step with the principal residence housing as development progresses.</p> <p>4. The National Park Authority will ensure that, whether through a single permission or incremental permissions, the number of affordable dwellings created is that which would have been required if the scheme had been constructed as a single development having regard to the planning unit and previous permissions since the adoption of the March 2005 Local Plan. In the case of the creation of more than one dwelling from a single previous planning</p>	<p>The change of use of serviced accommodation will be considered against policy RT-D3 Safeguarding Serviced Accommodation</p>	<p>Yes – removed from SA report</p>

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			<p>unit (whether at once or over a period of time) the development should contribute the maximum number of local need affordable homes consistent with this policy.</p> <p>5. Where there is reason to believe that the proposal is formulated with a view to circumventing or mitigating affordable housing requirements, including where the National Park Authority considers that a building is able to accommodate more than one dwelling unit, its capacity will be re-calculated.</p> <p>6. Where a scheme would provide more affordable homes than are needed in the parish and the adjacent parishes, now and in the near future, a financial contribution will be required towards affordable housing needed elsewhere in the National Park in accordance with GP5. Any housing which may be permitted to deliver the required affordable housing should be principal residence housing (HC-S4) and will be the minimum number required to support the delivery of the affordable housing.</p> <p>7. Where permission is granted, condition(s) will be attached removing permitted development rights in accordance with HC-S2 and CE-S5.</p>		
MM38	158	Policy HC-D9	<p>HC-D9 RURAL WORKERS</p> <p>1. New housing to meet the needs of rural workers in the open countryside will only be permitted in accordance with HC-D7 or HC-D8 and where:</p> <p>a) it is justified by a proven essential functional need for a full time rural worker in agriculture, forestry or other rural land based enterprises to live permanently at or near their place of work;</p> <p>b) in the case of agriculture or other rural land based enterprises, the business is proven to be financially viable in the long term, it is extensive in nature, the land management activity contributes to the conservation or enhancement of the natural beauty and wildlife of the National Park and is in accordance with the tests set out in Annex 2 of this Plan;</p> <p>c) where the need for a dwelling is proven, a planning condition will be attached to ensure that occupancy of the dwelling(s) is confined to a rural worker in agriculture, forestry or another rural land based rural land enterprise operating in the locality and in accordance with clause 1. a) above; and</p> <p>d) the net floorspace gross internal area will be 90 93sqm or less unless the Authority is satisfied it is demonstrated that a larger dwelling is required in which case, the size of the dwelling will be commensurate with the needs of the holding, it can be sustained by the farm business and it would be</p>	Points of clarification. Clause 1.d) - to reflect a change to the dwelling size in relation to Nationally Described Space Standards (Technical Housing Standards).	No - minor changes to policy wording

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			affordable for the essential need in perpetuity.		
MM39	166	Policy HC-D14	<p>HC-D14 SUBDIVISION OF EXISTING DWELLINGS</p> <p>1. Proposals for the subdivision of existing residential dwellings will be permitted where:</p> <ul style="list-style-type: none"> a) there would be no adverse impact on the character of the area, amenity of neighbouring occupiers, or highway safety; b) any necessary alterations will not adversely affect buildings of historic and/or architectural merit (CE-S4, CE-D3); and c) any additional units created will be pPrincipal rResidence housing and subject to a condition limiting its occupancy to a person as their only or principal home (HC-S4). <p>2. Where a property has a local affordable occupancy tie, any subdivision would require that the new unit(s) created would retain the same occupancy restriction.</p> <p>3. Proposals to subdivide a dwelling with a rural worker or succession farming occupancy tie will only be permitted where:</p> <ul style="list-style-type: none"> a) the additional unit(s) created will be occupied in accordance with HC-S3 Local Occupancy Criteria; or b) the additional unit(s) created will be occupied in accordance with the requirements for HC-D9 Rural Workers Dwelling or HC-D10 Succession Farming. <p>4. <u>Where permission is granted a condition may be attached removing permitted development rights in accordance with HC-S2.</u></p>	Additional clause 4 to ensure consistency with the reasoned justification.	No - minor changes to policy wording
MM40	167	Policy HC-D15	<p>HC-D15 RESIDENTIAL EXTENSIONS</p> <p>1. Proposals for residential extensions will be permitted where they:</p> <ul style="list-style-type: none"> a) accord with the principles set out in CE-S6 Design and Sustainable Construction Principles and CE-D4 Extensions; b) ensure there is sufficient space within the existing curtilage to accommodate the extension without resulting in overdevelopment of the site or adversely impacting on residential amenity space and parking provision; c) are not disproportionate to the original dwelling and in any case do not increase the external floorspace of the original dwelling by more than 35% 	In response to issues raised through the consultation and examination hearing sessions.	No – removal of clause 2 components will not affect sustainability.

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			<p>(taking into account any extensions provided through permitted development rights); and</p> <p>d) ensure the maintenance or replacement of any bat and barn owl roosts that may be present.</p> <p>2. Residential extensions will not be permitted <u>for temporary dwellings</u>, in the following circumstances:</p> <p>a) for dwellings where the size is restricted the proposed extension would exceed the net internal floorspace limitation—including local need affordable dwellings, extended family dwellings, succession farming dwellings, rural land-based worker dwellings and specialist housing for older people;</p> <p>b) for temporary dwellings, or</p> <p>c) for dwellings that are unauthorised or immune from enforcement action—including those dwellings which have had the benefit of a Certificate of Lawful Use or Development.</p> <p>3. Extensions to residential curtilages will only be permitted where it can be demonstrated that it will not adversely affect visual amenity, the setting of the residential building, and the surrounding landscape, <u>biodiversity</u> and/or settlement character of the area.</p>		

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MM41	176	Policy HC-S6	<p>HC-S6 LOCAL COMMERCIAL SERVICES AND COMMUNITY FACILITIES</p> <ol style="list-style-type: none"> 1. The National Park Authority will work with constituent local authorities, parish and town councils and communities to ensure that Exmoor's communities are sustained, the economy strengthened, and the needs of visitors addressed. 2. The provision of new or extended local commercial services and community facilities will be supported where it can be demonstrated that they: <ol style="list-style-type: none"> a) will benefit the local resident community and the needs of visitors; and b) are of a scale and location appropriate to the community they serve. 3. For new developments or extensions to existing premises, preference will first be given to the reuse of existing traditional buildings (CE-S5). The reuse of non-traditional buildings (CE-S5), will be considered if enhancement of the built and natural environment can be achieved. 4. New build developments should be located within Local Service Centres and Villages <u>the named settlements</u> or, for community facilities where no suitable site exists, are <u>should be</u> well-related to these settlements. Proposals specifically for new build and ancillary local commercial services should be in accordance with policy HC-D18 Local Commercial Service Provision. 5. Proposals enabling the enhancement of existing services and facilities, or the flexible use of new or existing buildings to allow a range of community services or facilities to take place on site will be encouraged – where this applies to an existing service the sharing of facilities should support the retention of the primary use. 6. The provision of publicly accessible green space within or adjoining the named settlements will be supported. 7. Local commercial services and community facilities will be safeguarded in accordance with policy HC-D19. 8. Important visual amenity space identified within and adjoining the settlements will be protected in accordance with policy HC-D20. 	For reasons of consistency with other policies in the Plan.	No - minor changes to policy wording

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SECTION 7: ACHIEVING A SUSTAINABLE ECONOMY					
MM42	192	Policy SE-S2	<p>SE-S2 BUSINESS DEVELOPMENT IN SETTLEMENTS</p> <p>1. In the named settlements proposals for business development or extensions to existing businesses should accord with policy SE-S1 and be located within the settlement or where no suitable buildings/sites are available, well-related to existing buildings.</p> <p>2. Proposals will be permitted where:</p> <p>a) they reuse existing traditional buildings wherever possible, in a way that maintains <u>and/or</u> enhances their character; or where no suitable buildings are available;</p> <p>b) where no suitable traditional buildings are available they reuse non-traditional buildings, or previously developed sites, and proposals achieve enhancement of the built environment is incorporated into proposals where necessary to deliver an overall acceptable scheme; or where this cannot be achieved;</p> <p>c) where this cannot be achieved a replacement of a non-traditional building, or a new site/building may be permitted.</p> <p>3. In addition to clause 1, any proposals for new build development in Porlock Weir, other than extensions to existing premises, should be:</p> <p>a) small-scale to reflect the form and character of the of the settlement; and</p> <p>b) compatible with industries associated with the settlement.</p> <p><u>4. Where permission is granted for new B1 uses a condition will be attached to remove permitted development rights in respect of temporary changes of use, use as a state funded school, or a registered nursery.</u></p>	For clarification, and consistency with the supporting text.	No – changes to wording will not affect sustainability.
MM43	192	Insert new paragraphs after para. 7.26	<p><u>Policy SE-S3 aims to provide diversification opportunities for rural land-based businesses which are businesses that manage the land extensively in a way that conserves and enhances the National Park's special qualities. These can be defined as farming enterprises based on primary food production, rural estates, forestry, mixed enterprises (e.g. with equestrian activities and/or game shooting) and other businesses that manage the land for conservation and/or recreation, which have benefits for health and well-being.</u></p>	Insertion of text to provide explanation of rural land-based businesses in the context of diversification	No – changes to supporting text only.

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			<p><u>Rural land-based businesses must also have a need to be located in the open countryside due to the nature of their operations.</u></p> <p><u>In terms of diversification proposals e.g. for conversions to holiday lets (RT-D4), provision of alternative camping accommodation (RT-D9), or the conversion of buildings for business development (which do not benefit from permitted development rights) a rural land-based business should provide at least full time employment for at least one member of staff. A small-holding that is a hobby farm as a lifestyle choice, which does not directly provide employment for one full-time equivalent person is unlikely to be considered for such diversification opportunities.</u></p> <p><u>Where there may be difficulties in determining whether a proposal for diversification of a 'rural land-based business' the applicant will need to demonstrate that the land-based business is a viable concern that generates sufficient income to diversify, or provide a business plan to show how the land-based enterprise can continue to be viable through diversification proposals.</u></p>	proposals.	
MM44	194	Policy SE-S3	<p>SE-S3 BUSINESS DEVELOPMENT IN THE OPEN COUNTRYSIDE</p> <ol style="list-style-type: none"> 1. Business development will be permitted for the change of use and conversion of an existing traditional building that is well-related to an existing group of buildings on a farmstead or in a hamlet where there is an existing dwelling, in accordance with policies SE-S1 and CE-S5. 2. Proposals for extensions to existing business sites or buildings that are well related to an existing group of buildings on a farmstead or in a hamlet where there is an existing dwelling will be permitted in accordance with SE-S1 and where the scale and appearance of the development are compatible with local landscape character. 3. Additionally, proposals for the diversification of existing agricultural, or other primary businesses responsible for land management, through the reuse/change of use of an existing non-traditional building for business development may be permitted where the following will be achieved: 	For consistency with the reasoned justification and to ensure the policy is clear in relation to the redevelopment of existing employment sites in the open countryside.	No – changes do not affect SA scoring.

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			<p>a) they are well-related to an existing group of buildings on the farmstead and accord with policy CE-S5;</p> <p>b) it can be demonstrated that the agricultural use of the existing building(s) to be re-used is redundant;</p> <p>b) c) the proposed business development supports an existing agricultural or other primary business responsible for land management and does not conflict with the existing farming or land management activity; and</p> <p>c) d) where proposals relate to the change of use of an existing building from an agricultural use to a business use (use classes B1, B2, B8 or sui generis), a condition may will be attached to the permission to enable the building to be used for the purposes of agriculture or the permitted business use.; and</p> <p>d) <u>a condition will be attached removing permitted development rights for the erection of new farm buildings on the holding.</u></p> <p>4. The erection of new business premises in the open countryside will not only be permitted <u>for the redevelopment of existing employment sites, where existing buildings are replaced with no significant increase in size, and enhancement to the site and/or its setting is incorporated into the proposals where necessary to deliver an overall acceptable scheme, which is consistent with local landscape character.</u></p> <p>5. Business use in buildings which stand alone or which do not relate well to existing buildings and are not part of a farm group or hamlet will not be permitted.</p> <p>6. <u>Where permission is granted for new B1 uses a condition will be attached to remove permitted development rights in respect of temporary changes of use, use as a state funded school, or a registered nursery.</u></p>		
MM45	195	Policy SE-D1	<p>SE-D1 HOME BASED BUSINESSES</p> <p>1. The use of part of a residential property, a small scale extension, the use of ancillary buildings where they are well related to existing buildings or, where no suitable buildings exist new outbuildings within the domestic curtilage, for a</p>	Clarification regarding live-work arrangements.	No – minor changes to policy wording

REF	PDLP PAGE	POLICY/ PARAGRAPH	PROPOSED MAIN MODIFICATION	REASON	DOES MAIN MODIFICATION AFFECT PREVIOUS SA SCORING?
			<p>small-scale home based business will be permitted where:</p> <p>a) there is no unacceptable adverse impact on the landscape or the amenity of the area or on the occupiers of neighbouring properties; and</p> <p>b) where an extension is proposed the development accords with Policy HC-D15 Residential Extensions.</p> <p>2. Where necessary, conditions will be attached to any granting of planning permission including to:</p> <p>a) control the use to avoid or minimise any potential adverse impacts;</p> <p>b) remove permitted development rights to protect the character and appearance of the building;</p> <p>c) ensure any new development may only be occupied in association with the dwelling and cannot be let or disposed of separately from that dwelling; and</p> <p>d) allow, where appropriate, the business use to cease and revert to an ancillary domestic use without the need for further planning permission.</p> <p>3. Proposals for live-work units should be in accordance with the housing policies in this Plan <u>and designed so the employment space can be used independently of the living accommodation.</u></p>		
MM46	197	Para. 7.40	<p>If the Authority is satisfied that the site and/or buildings are no longer viable in employment use, the owner/applicant will be required to maintain an enhanced level of employment generating uses on the remaining part of the site/in the building (i.e. at the same level as on the whole site but on/in a smaller area) or alternative provision will need to be provided on another suitable site(s)/building(s) under the control of the applicant; a planning condition or obligation will be used to ensure that the alternative provision is secured at an appropriate time in relation to the redevelopment of the site or building.</p>	<p>To ensure the reasoned justification is consistent with policy SE-D2</p>	<p>No – changes to supporting text only.</p>

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MM47	200	Policy SE-S4	<p>SE-S4 AGRICULTURAL AND FORESTRY DEVELOPMENT</p> <p>1. Permission will be granted for new or replacement buildings, tracks and structures or extensions required for agriculture or forestry purposes where:</p> <p>a) it can be demonstrated there is a functional need for the extension, building, structure or track and its size and scale is commensurate with the demonstrated need;</p> <p>b) the building, track or structure is designed for the purposes of agriculture or forestry;</p> <p>c) in the case of new buildings, the site is related physically and functionally to existing buildings associated with the business;</p> <p>d) they buildings, tracks or structures are sited appropriately in the context of local topography and of an appropriate design that responds to and reinforces landscape character in terms of size, scale, massing, layout, external appearance and materials – if a landscaping scheme is required it should be in accordance with policy CE-D1;</p> <p>e) they proposals do not generate a level of activity or otherwise detrimentally affect the amenity of surrounding properties and occupiers including through loss of daylight, overbearing appearance, or conflict with neighbouring land uses;</p> <p>f) appropriate measures are taken to ensure proposals do not, including through the level of activity, have an adverse impact on biodiversity and</p> <p>g) it can be demonstrated that opportunities have been taken for:</p> <p>i) the integration of passive design and sustainable construction methods to improve energy efficiency;</p> <p>ii) the integration of appropriate renewable energy technologies to reduce carbon emissions in accordance with CC-S5; and</p> <p>iii) minimising surface water run-off to avoid impacts on water quality (CC-D1).</p>	Points of clarification and consistency with the reasoned justification.	No – minor changes to policy wording.

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			<p>2. The National Park Authority will consider attaching a condition to any planning permission to require the removal of agricultural or forestry buildings when they are no longer required and the reinstatement of the land.</p> <p>2. 3. New isolated buildings will not be permitted unless it can be demonstrated that there are exceptional circumstances relating to an overriding functional need for a more isolated location, and where</p> <p style="padding-left: 40px;">a) they do not replace existing agricultural buildings that have been subdivided away from the holding; and</p> <p style="padding-left: 40px;">b) it is not as a result of the requirement for them does not result from a change in of farming practices, such that could adversely affect the management of the traditional landscape character of the National Park.</p> <p><u>Where new agricultural buildings with a floorspace of 500sqm or less are granted planning consent, permitted development rights may be withdrawn in respect of changes of use of agricultural buildings and any land within its curtilage to alternative uses.</u></p>		
SECTION 8: ACHIEVING ENJOYMENT FOR ALL					
MM48	204	Policy RT-S1	<p>RT-S1 RECREATION AND TOURISM</p> <p>1. Opportunities to provide a high quality, inclusive visitor experience on Exmoor through a diverse range of recreation and tourism facilities that actively enhance the understanding and enjoyment of the National Park's special qualities will be encouraged <u>in accordance with the following principles:-</u></p> <p>2. Development proposals should demonstrate that:</p> <p style="padding-left: 40px;">a) They underpin <u>are compatible with</u> the quiet enjoyment of the National Park. There are no unacceptable adverse effects on the natural and historic environment either individually or cumulatively through levels of activity or use.</p> <p style="padding-left: 40px;">b) They contribute towards a sustainable future for Exmoor's local economy and communities.</p> <p style="padding-left: 40px;">c) They support the improved health and wellbeing of people living,</p>	Points of clarification.	No – minor changes to policy wording

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			<p>working and visiting Exmoor through the benefits of recreation and experience of tranquillity.</p> <p>d) They ensure appropriate and safe access by the road network and where possible by walking, cycling, horse-riding and public transport.</p> <p>e) They safeguard the existing access network, including public rights of way, and access land; and provide enhancements where opportunities arise (RT-D12).</p> <p>f) They respond to opportunities to improve the quality and viability of existing recreation and tourism businesses, through appropriate restoration, extension, expansion or diversification.</p> <p>g) They are of a scale compatible with their location and setting, in accordance with the relevant development management policy considerations for tourism and recreation (policies RT-D1 to RT-D12).</p>		
MM49	209	Policy RT-D3	<p>RT-D3 SAFEGUARDING SERVICED ACCOMMODATION</p> <p>1. Development proposals that would involve the loss of existing serviced accommodation will only be permitted where:</p> <p>a) other employment uses are to be created in the existing building; or</p> <p>b) <u>the building is to become a Principal Residence dwelling (HC-S4) and evidence clearly demonstrates the use can change to a principal residence dwelling (HC-S4) that where:</u></p> <p>i) <u>the use was formerly a single residential dwelling on 1st July 1948 or the building was originally built as a single residential dwelling subsequently;</u></p> <p>ii) there has been no excessive alteration or extension; and</p> <p>iii) the existing use does not provide an additional community service or function; or.</p> <p>c) <u>they accord with clauses 2 and 3 below.</u></p> <p>2. Where clauses <u>1 a) and b)</u> does not apply, proposals relating to the change of use of serviced accommodation should be demonstrate that the current use of the building as serviced accommodation cannot be continued or made viable in the longer term and the property has been marketed as a going concern at a reasonable value for a minimum period of 12 months. An independent valuation of the building will be required.</p> <p>3. Where it is demonstrated that the serviced accommodation is no longer viable</p>	Points of clarification, and to remove the date from clause 1.b)i).	No – minor changes to policy wording

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			<p>(clause 2), proposals for change of use should be compatible with the cultural heritage of the existing building, local character and amenity and in accordance with the following:</p> <p>a) Changes that will be considered acceptable in principle include:</p> <ul style="list-style-type: none"> i) Change of use to self-catering apartments. ii) Change of use to provide community services or facilities. iii) A mixed use development, based on the uses listed above including employment use. <p>b) Proposals for the change of use to residential dwellings will only be considered where the requirements of this policy are met and clause 3(a) cannot be achieved. Proposals should accord with <u>HC-D6 Change of Use of Serviced Accommodation to Housing</u> the tests set out in clause 2 of policy HC-D1.</p> <p>c) In relation to 3 (a) and (b), opportunities for the partial change of use of the building or complex that supplements the existing serviced accommodation will be encouraged.</p>		
MM50	212	Policy RT-D4	<p>RT-D4 NON-SERVICED ACCOMMODATION</p> <p>1. Proposals for the change of use and conversion of buildings to non-serviced accommodation will be permitted where they:</p> <ul style="list-style-type: none"> a) create additional unit(s) on an existing self-catering complex; b) accord with RT-D3 Safeguarding Serviced Accommodation clause 3a); c) reuse a redundant building associated with a hotel/guesthouse premises; or d) relate to the diversification of a rural land-based business, <u>where the building is well-related to an existing grouping of buildings.</u> <p>2. Proposals should also meet the following principles:</p> <ul style="list-style-type: none"> a) the character and appearance of the building and its setting is conserved, and where they accord with policies on landscape character, cultural heritage and design (<u>CE-S1, CE-S4 and CE-S6</u>); b) <u>where the proposal involves the change of changing the use of traditional farm buildings, the entire range conversion of all such buildings within a farmstead; will not be permitted in order to be converted to protect the historic character and significance of the</u> 	Points of clarification.	No – minor changes to policy wording

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			<p>buildings collectively (CE-S5);</p> <p>c) the design and layout of access and parking requirements are compatible with landscape character and built heritage, and the local road network has capacity to service the accommodation without adversely affecting road safety; and</p> <p>d) there are no adverse impacts on tranquillity and local amenity.</p> <p>3. Small scale extensions and alterations will be permitted to improve the quality and viability of existing non-serviced accommodation; where it would not adversely affect the historic character of the existing building. No new build units of holiday-let accommodation will be permitted.</p> <p>4. Where a non-serviced accommodation unit is no longer needed or viable, a proposal to replace the holiday occupancy condition of the unit with an agreement limiting occupancy to meet a local affordable need for housing or housing for extended families will be considered in accordance with policy HC-D13. In respect of changes to business or community use, proposals should accord with the relevant policies in the plan.</p>		
MM51	214	Policy RT-D6	<p>RT-D6 CAMPING BARNES</p> <p>1. Proposals for the change of use and necessary alteration of a traditional building to a camping barn or hostel accommodation will be permitted where it complements the historic character and appearance of the building, biodiversity interests, and its setting within the landscape.</p> <p>2. Where the existing building is located: in a farmstead or hamlet in close association with an existing dwelling, or in a named settlement:</p> <p>a) in a farmstead or hamlet in close association with an existing dwelling, parking and access arrangements should be incorporated within the hamlet/farmstead building group without detrimentally impacting on landscape character and visual amenity; or</p> <p>b) in a named settlement, parking and access arrangements in a settlement are consistent with policies AC-D1 and AC-S3; and</p> <p>c) utility and service supplies will be routed underground.</p> <p>3. The change of use and conversion of a traditional barn or building in an isolated location to provide basic shelter in a camping barn (stone tent) with limited facilities for walkers, will be permitted where it can be demonstrated that:</p>	Points of clarification and to reduce the number of clauses where other policy requirements will apply.	No – minor changes to policy wording

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			<ul style="list-style-type: none"> a) the building can be managed effectively without new access provision; b) the proposal does not involve alterations to the external fabric and surroundings of the building that would materially affect the character or appearance of the building and its setting; a) the building is well related to the rights of way network or access land; and b) any bat and barn owl roosts that may be present are maintained or replaced. 		
MM52	231	Policy RT-S2	<p>RT-S2 REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY</p> <p>1. Proposals for the reinstatement of the Lynton and Barnstaple Railway should be in accordance with the following criteria:</p> <ul style="list-style-type: none"> a) the proposal should seek to reinstate and replicate the former narrow gauge railway including the line of the original route and the siting, design, appearance, and materials of the associated structures or buildings; b) any additional new development over and above the original historic former railway should provide demonstrable evidence that it is essential for the operation of the reinstated former railway or is a restoration of a historic feature and that there are no alternative solutions which would reasonably meet the need for the development in any other way; c) reinstatement proposals should: <ul style="list-style-type: none"> i) Seek to re-use the original buildings associated with the former railway. ii) Where it can be demonstrated that the re-use of the original buildings cannot be achieved, existing buildings in suitable proximity to the reinstatement proposal may be considered. iii) New buildings will only be considered where it can be demonstrated that there are no existing buildings suitable for re-use. d) new infrastructure, buildings and structures should complement the character of the original railway; e) the proposal should respond to landscape character and ensure landscaping is appropriate to the site and character of the area and having regard to traditional features of the former railway (CE-S1); 	New criterion relating to safeguarding biodiversity and geodiversity.	No – minor changes to policy wording already taken into account in previous SA appraisal.

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			<ul style="list-style-type: none"> f) <u>the proposal should safeguard wildlife, habitats and sites of geological interest (CE-S3);</u> g) f) sustainable construction methods should be used, unless they compromise the historical accuracy and appearance of the former railway; h) g) the proposal should accord with AC-D1 and provide a travel plan to incorporate measures to enable safe access by walking, cycling and public transport that will help to minimise traffic generation and the need for parking; i) h) parking provision should be in accordance with policies AC-S3 and AC-D2; and j) i) provision of temporary overflow parking to help address peak parking demand should accord with AC-D3. 		
SECTION 9: ACHIEVING ACCESS FOR ALL					
MM53	240	Policy AC-S3	<p>AC-S3 TRAFFIC MANAGEMENT AND PARKING</p> <ol style="list-style-type: none"> 1. The approach to traffic management on Exmoor will take into account the needs of all users including pedestrians, walkers, cyclists, horse-riders, and disabled people, including through the provision of alternative routes to avoid busy roads, safer crossing points, and use of shared surfaces where appropriate. 2. The Exmoor Route Network, as shown on the policies map, will form the framework for traffic and freight management in the National Park. 3. Replacement of existing car parking (lost through development or coastal change), or the creation of small scale new facilities will be permitted where: (a) this enables opportunities to enhance public understanding and enjoyment of the National Park; or (b) this would relieve traffic and parking pressure elsewhere in the locality;; and <u>including adverse impacts arising from parking on the highway, and</u> Such provision should also ensure that: <ul style="list-style-type: none"> a) e) there is good accessibility, and there would be no material harm to the character and appearance of the locality or views from publicly accessible locations; and b) d) it is well designed in accordance with the criteria set out in policy AC-S2(1). 4. In the National Park there is a presumption against providing for peak parking 	Points of clarification	No – minor changes to policy wording.

REF	PDLP PAGE	POLICY/ PARAGRAPH	PROPOSED MAIN MODIFICATION	REASON	DOES MAIN MODIFICATION AFFECT PREVIOUS SA SCORING?
			<p>demand. The National Park Authority will work with highways authorities, Town and Parish Councils and local communities to identify local solutions to congestion and parking issues in keeping with landscape character, providing for community needs and utilising temporary solutions for peak parking where necessary and appropriate (AC-D4).</p> <p>5. Proposals for new development should make adequate provision for parking in accordance with AC-D3.</p>		
MM54	240	Para. 9.28	<p>Policy AC-D3 guides parking provision in developments – the principle will be to minimise parking taking into account environmental constraints. Table 9.1 <i>Guide to Parking Standards</i> lists optimum levels of provision and is intended to guide applicants regarding the levels of for car, cycle, motorcycle parking and parking for disabled people¹⁰⁷. The parking standards reflect the rural nature of the National Park, and that many people will be dependent on access to a car. Car parking standards include any garages or car ports provided. However, developments in more sustainable locations that are well served by public transport or have good walking and cycling links will be considered appropriate for lower levels of car parking provision. There may be circumstances such as change of use, or new development in restricted locations where it is not possible to accommodate parking. In order to enable otherwise appropriate development, the National Park Authority will take into account the proximity of public parking (including on- road parking) and public transport when considering applications. Applicants will be expected to provide clear evidence to justify higher car parking provision. <u>Proposals for a higher level of car parking provision should be supported by robust evidence.</u> Proposals for higher levels of cycle parking will be favourably considered.</p>	Points of clarification in relation to parking provision.	No – minor wording changes have been made to supporting text.
MM55	247	Policy AC-S4	<p>AC-S4 ELECTRICITY AND COMMUNICATIONS NETWORKS</p> <p>1. Development to improve the accessibility and standard of the electricity and telecommunications networks will be encouraged in order to contribute to thriving communities and businesses, and climate change mitigation. Great weight will be given to ensuring that the National Park and its special qualities</p>	Points of clarification regarding major development proposals.	No – minor changes to policy wording.

¹⁰⁷ The parking standards in Table 9.1 are based on the Somerset County Council Parking Standards (Zone C), adapted to reflect the lower levels and sizes of development that are more typical in the National Park, and applied across the whole National Park.

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			<p>are conserved and enhanced.</p> <p>2. Proposals will be supported where:</p> <p>a) the location, siting, scale and design of structures will not cause any unacceptable adverse impacts on the landscape and/or seascape character, visual amenity, biodiversity and cultural heritage of the National Park;</p> <p>b) co-operative working with partner organisations and utility operators has been demonstrated, to facilitate the sharing, utilisation and consolidation of existing communications infrastructure in rolling out new or improved communication technologies; and</p> <p>c) provision is made for the removal of apparatus and reinstatement of land when the apparatus becomes redundant.</p> <p>3. Proposals for M-major and nationally significant transmission infrastructure including high voltage pylon transmission lines, substations and other above ground structures from large scale offshore renewable energy schemes will be considered in accordance with resisted (GP2 Major Development).</p>		
MM56	248	Policy AC-D5	<p>AC-D5 RADIO AND MOBILE TELECOMMUNICATIONS INFRASTRUCTURE</p> <p>1. Proposals for radio and mobile telecommunications development will be permitted where they first seek to share existing infrastructure, there is capacity in landscape terms, and no increase in height of existing masts is required.</p> <p>2. Where it can be demonstrated that (1) is not possible, apparatus will be sited on existing masts or other features such as buildings or other structures, to minimise adverse effects on landscape character.</p> <p>3. Where it can be demonstrated that (1) and (2) are not possible, the apparatus shall be sited and designed to ensure that it has an acceptable appearance in the landscape including through camouflage as a natural or traditional feature.</p> <p>4. In determining all proposals:</p> <p>a) the highest standards of design will be sought in terms of colour, dimensions, construction and overall shape to minimise any visual impact;</p> <p>b) there will be no unacceptable cumulative or sequential visual impact with other vertical structures in the landscape;</p>	In response to consultation representations.	Yes – policy scoring for SA objective 2: Biodiversity and Green Infrastructure did not previously take into account policy wording relating to protection of wildlife and habitats.

REF	PDLP PAGE	POLICY/ PARAGRAPH	PROPOSED MAIN MODIFICATION	REASON	DOES MAIN MODIFICATION AFFECT PREVIOUS SA SCORING?
			<ul style="list-style-type: none"> c) there will be no <u>unacceptable</u> adverse effects on sensitive habitats and wildlife <u>or the historic environment</u>; d) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building; e) the amenity of nearby residents and visitors are not adversely affected; and f) opportunities for enhancement of the landscape including consolidation of any existing telecommunications infrastructure will be sought. <p>5. A condition will be attached to any planning consent to ensure that there will be ongoing management in place where trees are essential in providing amelioration to visual impacts including as camouflage to antenna within trees.</p>		
MM57	251	Policy AC-D6	<p>AC-D6 FIXED LINE TRANSMISSION INFRASTRUCTURE</p> <ol style="list-style-type: none"> 1. <u>Proposals for new transmission lines will only be permitted where they first seek to be routed underground, unless they this will conflict with policies CE-S1 Landscape and Seascape Character, CE-S3 Biodiversity and Green Infrastructure, CE-S4 Cultural Heritage and Historic Environment and the need for the service cannot be met in any other way.</u> 2. <u>Where it can be demonstrated that (1) is not possible, other means of providing the service with minimal environmental impact should be considered (CC-S5 Low Carbon and Renewable Energy Development, CE-D7 Satellite Antennae), and the need for the service cannot be met in any other way.</u> 3. <u>Where it can be demonstrated that (1) and (2) are not possible in this circumstance, proposals for overhead lines may only be permitted where the visual impact is minimised by selecting the least obtrusive route and where it will not cross any moorland or open landscapes, or break the skyline.</u> 4. <u>Proposals relating to low voltage electrical cabling from renewable energy technologies (CC-S5) will only be permitted where:</u> <ol style="list-style-type: none"> a) they will be routed underground; b) they will not adversely affect landscape and seascape character, biodiversity, cultural heritage or recreational use of the coast; and c) there is adequate infrastructure to connect cabling nearby that does not require substantial modification or upgrading, or where any modification 	To introduce a sequential approach for fixed line infrastructure proposals.	Yes – assessment did not previously take into account protection of seascape character.

REF	PDLP PAGE	POLICY/ PARAGRAPH	PROPOSED MAIN MODIFICATION	REASON	DOES MAIN MODIFICATION AFFECT PREVIOUS SA SCORING?
			<p>/upgrading to existing infrastructure is minimal and will not have any unacceptable impact.</p> <p>5. 3. Development proposals that include <u>require</u> electricity or telecommunication service lines to new development will be expected to provide underground routing subject to policies CE-S1, CE-S3 and CE-S4.</p>		
SECTION 10: EXMOOR'S SETTLEMENTS					
MM58	279	Policy ES-S2	<p>ES-S2 LYNTON & LYNMOUTH NEIGHBOURHOOD PLAN</p> <p>1. Development proposals within Lynton & Lynmouth parish shall be determined in accordance with the Lynton & Lynmouth Neighbourhood Plan 2013 – 2028 and the strategic policies of the Local Plan.</p> <p>2. Development management policies in the Local Plan will only be given greater weight in the following circumstances:</p> <p style="margin-left: 20px;">a) where the neighbourhood plan is silent, indeterminate or out of date; and</p> <p style="margin-left: 20px;">b) using RT-D3 safeguarding serviced accommodation to determine related proposals for the change of use of serviced accommodation within the Neighbourhood Plan area (over-riding the Lyn Plan policy E2 Change of Use of Hotels & Guesthouses).</p> <p>3. Should a conflict arise between development management policies in the Local Plan and the policies in the Neighbourhood Plan, the conflict will be resolved in favour of the Neighbourhood Plan until the end of the Plan period in 2028 or until it is reviewed, whichever is earlier, unless it is considered that the proposal would otherwise have a detrimental impact on the achievement of National Park purposes.</p>	Policy ES-S2 conflicts with the legal principle that a policy in a development plan cannot disapply a statutory provision. Nor can it prescribe the circumstances in which a decision-maker must give greater weight to one given set of development plan policies than to another	Yes- policy appraisal removed from SA report.
SECTION 11: MONITORING AND IMPLEMENTATION FRAMEWORK					
MM59	302	After para. 11.3 – insert new paragraph 11.3A	<p><u>11.3A Particular attention will be paid to monitoring both the indicative level of need for affordable housing and the number of affordable dwellings permitted each year. This reflects the priority which the Plan gives to providing affordable housing to meet local needs. Policy MI-S1 sets out the indicators that will be used to determine whether affordable housing need is being met and the process for determining whether a review of the Plan may be needed.</u></p>	Reasoned justification for an additional policy on monitoring and review of affordable housing need and provision.	No – additional supporting text only.

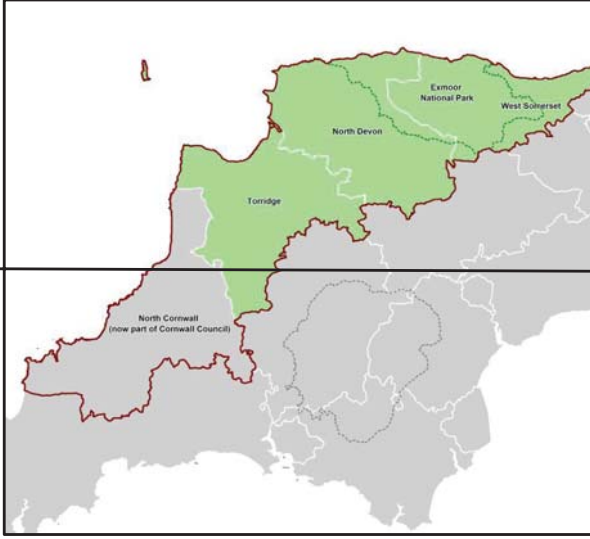
REF	PDLP PAGE	POLICY/ PARAGRAPH	PROPOSED MAIN MODIFICATION	REASON	DOES MAIN MODIFICATION AFFECT PREVIOUS SA SCORING?
		After new para. 11.3A and before Policy M1-S1, insert new para 11.3B	<p>11.3B Reflecting <u>experience of rural affordable housing delivery, in applying policy M1-S1 the National Park Authority will have regard to:</u></p> <p>a) <u>the cumulative number of affordable dwellings that have been permitted since the start of the plan period;</u></p> <p>b) <u>affordable dwellings under construction and completions since the start of the plan period; and</u></p> <p>c) <u>Evidence from parish household surveys on the level of affordable housing need in the National Park.</u></p> <p><u>Experience of providing for affordable housing on Exmoor shows that up to date parish household need surveys are the most accurate way of assessing affordable housing need for parishes within the National Park to enable housing to be delivered where it is needed. Following a needs led approach, such surveys will in practice be the basis for assessing planning applications for affordable local need housing (see para 6.35 (as amended by para 6.35 to 6.36 of Further Proposed Changes to Section 6). If monitoring shows that affordable housing delivery is below the threshold set out in the policy, evidence from up to date parish housing need surveys will be assessed. If this also indicates that there is a shortfall in the delivery against proven need then it will help to decide to trigger a review.</u></p>		
MM60	302	Insert after para. 11.3	<p><u>MI-S1 MONITORING AND REVIEW OF AFFORDABLE HOUSING NEED AND PROVISION</u></p> <p><u>1. The Authority will complete a review of the indicative affordable housing need figure for the Plan period set out in paragraph 6.31 of the Plan, on the basis of the latest available evidence, by no later than 31 December 2020 and at intervals of no more than five years thereafter. If any review shows that there has been an increase of more than 20% in the indicative affordable housing need figure compared with the figure in paragraph 6.31 of the Plan, a full or partial review of the Plan will be undertaken to take account of this change.</u></p> <p><u>2. If in any continuous three-year monitoring period the total number of affordable dwellings permitted in those three years is less than 10% of the indicative affordable housing need figure for the Plan period as a whole set out in paragraph 6.31 of the Plan, the Authority will carry out a review of the</u></p>	Additional policy on monitoring and review of affordable housing need and provision.	Yes – new policy added to Local Plan and appraised in SA report.

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			<p><u>reasons for this in consultation with local stakeholders unless:</u></p> <p><u>a) cumulative delivery since 2011 meets or exceeds the total of the average annualised figure of affordable housing need to date; or</u></p> <p><u>b) evidence from up to date parish housing need surveys shows that existing levels of provision are sufficient to meet local needs for affordable housing.</u></p> <p><u>3. If a review is triggered in accordance with clause 2 of this policy and it indicates that changes to the Plan are needed to increase delivery of affordable housing to meet local needs, a full or partial review of the Plan will be undertaken to take forward the necessary changes.</u></p>		

Schedule of Proposed Further Changes to Section 6 and Implications for the SA

REF	PAGE/PARA	PROPOSED CHANGE	REASON	DOES PROPOSED CHANGE AFFECT PREVIOUS SA SCORING?
PC1	Page 125 Para. 6.26	<p>HOUSING NEED Objectively Assessed Need OBJECTIVELY ASSESSED HOUSING NEED (OAHN)</p> <p>6.26 In line with national policy, the need (both affordable need and market demand) for housing in the Northern Peninsula Housing Market Area (HMA) has been objectively assessed and updated. The 2008 Northern Peninsula Strategic Housing Market Assessment (SHMA) was prepared in partnership with the other local authorities within in the same HMA housing market area (North Cornwall, Torridge, North Devon West Somerset and Exmoor National Park),²⁸⁶ and updates were subsequently completed To take account of the changes in economic and market conditions since the preparation of the original assessment, separate updates were completed between 2012 and 2014.²⁸⁷ In early 2015, a joint Northern Peninsula Strategic Housing Market Area (SHMA) Update was carried out to provide evidence for Torridge, North Devon, West Somerset and the National Park.²⁸⁸ Together with a Cornwall Council assessment of the requirement and future delivery of housing in the former North Cornwall district, it provides evidence on future population-led growth. A joint review of the implications of the 2012-2014 household projections was completed in 2015 it provides evidence to underpin planning for the delivery of housing in the Housing Market Area over the plan period.^z</p> <p><i>References:</i> 1 ²⁸⁶ Housing Vision (2008) Strategic Housing Market Assessment for the Northern Peninsula. 2 ²⁸⁷ Housing Vision (2012) Strategic Housing Market Assessment: North Devon and Torridge Update, Final Report. Housing Vision (2013) Strategic Housing Market Assessment: West Somerset Update, Final Report. Housing Vision (2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset, Final Report. 3 ²⁸⁸ Housing Vision (January 2015) Northern Peninsula Housing Market Area Strategic Housing Market Assessment (SHMA) Update: Final Report. ^x Housing Vision (December 2015) (September 2016) Northern Peninsula Housing Market Area Strategic Housing Market Assessment (SHMA): The Implications for Housing Need of the 2012-2014-based Household Projections.: Final Report</p>	Provides updates to the text, to reduce the length and complexity and to refer to the new evidence commissioned by ENPA, North Devon Council and Torridge District Council.	No – does not alter SA effects of plan.
PC2	Page 125 Para. 6.27	<p>6.27 The Government has clarified that need alone is not the only factor to be considered. Objectively assessed need should not be met if adverse</p>	Text proposed to be deleted to avoid repetition with other text	No – change removes text repeated elsewhere.

REF	PAGE/PARA	PROPOSED CHANGE	REASON	DOES PROPOSED CHANGE AFFECT PREVIOUS SA SCORING?
		<p>impacts would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF, or where specific policies indicate development should be restricted, such as within a National Park.²⁸⁹ Great weight should be given to conserving landscape and scenic beauty in National Parks, which have the highest status of protection in relation to landscape and scenic beauty.²⁹⁰ The NPPF refers to the National Parks and the Broads Vision and Circular as providing further guidance.²⁹¹ National Parks are not suitable locations for unrestricted housing and general housing targets are not provided.²⁹²</p> <p><i>References:</i> ²⁸⁹ DCLG (2012) National Planning Policy Framework, London: Department of Communities and Local Government, footnote 9 of paras. 14 & 47. DCLG (2014) Press Release: Councils must protect our precious green belt land [Online] Available: https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land (); DCLG (2012) National Planning Policy Framework, London: Department of Communities and Local Government, paragraph 54 ²⁹⁰ Ibid. Paragraph 115. ²⁹¹ DCLG (2012) National Planning Policy Framework, London: Department of Communities and Local Government, para. 115 footnote 25. DCLG (2014) Planning Policy Guidance: How should local authorities support sustainable rural communities? (paragraph 001, Reference ID: 50-001-20140306) [Online] http://planningguidance.planningportal.gov.uk/blog/guidance/rural-housing/how-should-local-authorities-support-sustainable-rural-communities/; and ²⁹² DEFRA (2010) English National Parks and the Broads UK Government Vision and Circular, London: Department for Environment, Food and Rural Affairs, para. 78.</p>	<p>in Section 6 and to reduce the length and complexity of the Plan.</p>	

REF	PAGE/PARA	PROPOSED CHANGE	REASON	DOES PROPOSED CHANGE AFFECT PREVIOUS SA SCORING?
PC3	Page 126 Map 6.1	<p>Map 6.1 Exmoor National Park within the Northern Peninsula Housing Market Area <i>(Map courtesy of Torrington District Council)</i></p> 	Delete Map as included within the Housing Topic Paper 2016. ¹⁰⁸	No – removal of map does not alter SA effects of the plan.

¹⁰⁸ ENPA (2016) Housing Topic Paper May 2016

REF	PAGE/PARA	PROPOSED CHANGE	REASON	DOES PROPOSED CHANGE AFFECT PREVIOUS SA SCORING?
PC4	Page 126 Para. 6.28	<p>6.28 The Exmoor National Park Housing Topic Paper sets out how the objectively assessed housing need (OAHN) for Exmoor National Park of is 718. 541 units 2011-31 has been calculated. The unadjusted housing figure identified by the Joint SHMA Update for Exmoor National Park based on household projections 2011-31 is 537 units.²⁹³</p> <p>References: ²⁹³ ENPA (2016) Exmoor National Park Local Plan Housing Topic Paper Housing Vision (September 2016) Northern Peninsula Housing Market Area SHMA: The Implications for Housing Need of the 2014-based Household Projections. Figures derived from Tables 2.3 and 2.4 ²⁹⁴ Housing Vision (January 2015) Northern Peninsula Housing Market Area Strategic Housing Market Assessment (SHMA) Update: Final Report</p>	To refer to the new evidence commissioned by ENPA, North Devon Council and Torridge District Council regarding the review of the 2014-based subnational household projections and implications for housing need.	No – The plan still does not require specific figures for housing delivery, but takes an exceptions approach to housing development.
PC5	Page 126 Para. 6.29	<p>6.29 The figure for the area of North Devon within the National Park is 205 (when adjusted). This includes both affordable and market housing and does not take into account housing completions since 2011/12.²⁹⁴ In considering the evidence for the area, and co-operating with North Devon Council, there is agreement that provision to meet the delivery of the 205 units of housing need identified for the part of North Devon in Exmoor National Park, a proportion of which will be affordable, identified for that part of North Devon in Exmoor National Park will be included in the North Devon and Torridge Local Plan housing requirement to be met in the North Devon area outside the National Park. North Devon Council has taken the view that the additional housing should be located close to and accessible to the National Park's boundaries and that community aspirations for growth identified by Ilfracombe, South Molton and local centres complement this objective.</p> <p>References: ²⁹⁴ Ibid</p>	To rationalise housing evidence in the plan itself and to reduce the length and complexity of the Plan.	No – this change discusses development outside of the plan.

REF	PAGE/PARA	PROPOSED CHANGE	REASON	DOES PROPOSED CHANGE AFFECT PREVIOUS SA SCORING?
PC6	Page 126 Para. 6.30	<p>6.30 Taking into account the backlog of affordable housing, there is projected to be an objectively assessed need (OAN) for 306 affordable units in the area of the National Park in West Somerset over the plan period.²⁹⁵ The remaining area of the National Park is within the West Somerset housing authority area. In this plan, the focus is on the delivery of affordable housing for which it is projected that there will be a need for 336 238 units over the plan period.^x</p> <p><i>References:</i> ²⁹⁵ Housing Vision (March 2015) Strategic Housing Market Assessment Update: Exmoor National Park. Final Report, Dulverton: Exmoor National Park Authority. ^x Housing Vision (December 2015) Northern Peninsula Housing Market Area Strategic Housing Market Assessment (SHMA): The Implications of the 2012-based Household Projections. Final Report Housing Vision (September 2016) Northern Peninsula Housing Market Area SHMA: The Implications for Housing Need of the 2014-based Household Projections. Figures derived from Tables 2.3 and 2.4.</p>	To refer to the new evidence commissioned by ENPA, North Devon Council and Torridge District Council regarding the review of the 2014-based subnational household projections and implications for housing need within the National Park.	No – The plan still does not require specific figures for housing delivery, but takes an exceptions approach to housing development.
PC7	Page 127 – insertion of new paragraph	<p>STRATEGIC POLICY HC-S1</p> <p>6.30A National policy is that if adverse impacts would outweigh the benefits when assessed against the policies in the NPPF or where specific policies indicate development should be restricted, such as within a National Park, that objectively assessed housing need should not be met.^x The National Parks and the Broads Vision and Circular states that National Parks are not suitable locations for unrestricted housing and general housing targets are not provided.^{xx}</p> <p><i>References:</i> ^x DCLG (2012) National Planning Policy Framework, London: Department of Communities and Local Government, footnote 9 of paras. 14 & 47. DCLG (2014) Do housing and economic needs override constraints on the use of land, such as Green Belt? [Online] available: Paragraph: 044 Reference ID: 3-044-20141006 Underlining in text has been added. DCLG (2014) Do local planning authorities have to meet in full housing needs identified in needs assessments? [Online] available: Paragraph: 045 Reference ID: 3-045-20141006. ^{xx} DCLG (2012) National Planning Policy Framework, London: Department of Communities and Local Government, para. 115 footnote 25. DEFRA (2010) English National Parks and the Broads UK Government Vision and Circular, London: Department for Environment, Food and Rural Affairs, para. 78. DCLG (2014) Planning Policy Guidance: How should local authorities support</p>	For clarification.	No – change is for clarification only and does not alter the SA effects of the plan.

REF	PAGE/PARA	PROPOSED CHANGE	REASON	DOES PROPOSED CHANGE AFFECT PREVIOUS SA SCORING?
		<u>sustainable rural communities? (paragraph 001, Reference ID: 50-001-20140306) [Online]; and DCLG (2012) National Planning Policy Framework, London: Department of Communities and Local Government, para. 115</u>		
PC8	Page 127 – insertion of new paragraph	6.30B ENPA has taken account of statutory National Park purposes, the local socio-economic duty to National Park communities and constraints which indicate that development should be restricted and that the ability to meet the full need (demand) for housing over the plan period is constrained.	For clarification.	No – change is for clarification only and does not alter the SA effects of the plan.
PC9	Page 126-7 Para. 6.31	6.31 The estimate of local affordable housing need in the National Park 2011-2031 is 306 units . This does not take into account affordable housing completions since 2014. The approach to housing delivery in this Plan is therefore to provide positively for housing, working with estimates of housing provision through a rural exceptions approach and without a target to deliver locally needed affordable homes housing up to the point at which the National Park would be harmed. The indicative figure of affordable housing units needed in the National Park 2011-2031 for this Local Plan is 336-238 units. {Split to create a new paragraph} 6.31A This approach is appropriate in a remote rural area, given the small size of Exmoor's settlements, landscape sensitivity and capacity, and SHLAA supply and is consistent with National Park purposes, national policy and guidance, and the duty to local communities, and national policy and guidance.	To refer to the new evidence commissioned by ENPA, North Devon Council and Torridge District Council regarding the review of the 2014-based subnational household projections and implications for housing need – resulting in an updated indicative figure for affordable housing in the National Park.	No – The plan still does not require specific figures for housing delivery, but takes an exceptions approach to housing development.
PC10	Page 127 Para. 6.32	ASSESSING THE NEED FOR AFFORDABLE HOUSING IN THE NATIONAL PARK 6.32 Feedback from the community 'Your Future Exmoor' events demonstrated widespread support for housing that is affordable to local people. ²⁹⁵ The National Park Authority, through being based on Exmoor, and working at a local level and in partnership with others (including the District Housing Authorities) has a good understanding of the needs of the area and, from 2002, hosted the Rural Housing Project (RHP). <i>Reference:</i> ²⁹⁶ Exmoor National Park Authority (2010) Your Future Exmoor' Feedback Reports (2010). [online: available: http://www.exmoor-nationalpark.gov.uk/planning/planning-policy/local-development-framework/your-future-exmoor	For clarification and to reduce the length and complexity of the Plan.	No – change is for clarification only and does not alter the SA effects of the plan.

REF	PAGE/PARA	PROPOSED CHANGE	REASON	DOES PROPOSED CHANGE AFFECT PREVIOUS SA SCORING?
PC11	Page 127 Para. 6.33	<p>6.33 Housing Authority waiting lists have been replaced with a housing register which may not record local connection or may define it differently from planning policies. Households bid for affordable housing as it becomes available. As with the former waiting lists, there remains an issue with rural households registering on the system.</p> <p><i>(Split to create a new paragraph)</i></p> <p>6.33A This was an important reason for the setting up of the RHP. It is therefore important that actual need is assessed. The RHP It carried approach, carrying out rural parish housing need surveys across West Somerset, North Devon, and Exmoor National Park and provided more accurate information on affordable need, and It consistently revealed a local, albeit often small, need, in some cases fewer than three households, for affordable housing in settlements as well as detailed information on size, type and tenure.²⁹⁷</p> <p><i>Reference:</i> ²⁹⁷ http://www.exmoor-nationalpark.gov.uk <u>At September 2013 the estimate of affordable need for Exmoor National Park was 90 units.</u></p>	To simplify the wording for clarification and correct a grammatical error.	No – change is for clarification only and does not alter the SA effects of the plan.
PC12	Page 127 Para. 6.34	<p>6.34 Surveys carried out between 2002 and 2008 identified 262 households in affordable need in the parishes within and split by the National Park boundary while a Park-wide ‘snapshot’ survey to estimate housing need, identified 127 households with a local connection.²⁹⁸ A ‘snapshot’ Based on analysis of the needs data and affordable housing completions at September 2013, provided the an estimate of housing need of 90 units for the whole of Exmoor National Park at September 2013 was 90 units.²⁹⁹ The reduction in the number of households assessed as being in need indicates, despite newly arising households, that the strategy has, through the delivery of 83 local need affordable homes 2005/06 to 2013/14, helped to address need in the National Park.</p> <p><i>References:</i> ²⁹⁸ Rural Housing Project (2008) Exmoor National Park LDF survey of affordable housing need. ²⁹⁹ Exmoor National Park, West Somerset and North Devon Rural Housing</p>	To reduce the length and complexity of the Plan. This data is set out in the Housing Topic Paper.	No – removal of information only, which can be found in other supporting documents.

REF	PAGE/PARA	PROPOSED CHANGE	REASON	DOES PROPOSED CHANGE AFFECT PREVIOUS SA SCORING?
		Project: Households in Affordable Housing Need in Exmoor National Park.		
PC13	Page 127 Para. 6.35	<p>6.35 This figure of 90 units should be considered as part of the 306 estimate of 336 affordable households identified needed for West Somerset within the National Park.⁹⁹⁹ This estimate, within the affordable need figure of 306, is considered helpful in framing the Local Plan housing strategy for the National Park to 2031. However, The affordable need figure of 238 units is considered helpful in framing the Local Plan housing strategy to 2031^x, however the housing figures set out in this plan should therefore not be used in determining individual planning applications, and Parish surveys may ultimately show a different figure for the remaining period of the Local Plan.</p> <p><i>Reference:</i> ⁹⁹⁹ Housing Vision (2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset, Final Report. ^x Housing Vision (September 2016) Northern Peninsula Housing Market Area SHMA: The Implications for Housing Need of the 2014-based Household Projections, Figures derived from Tables 2.3 and 2.4.</p>	To reduce the length and complexity of the Plan. This data is set out in the Housing Topic Paper. The review of the 2014-based subnational household projections and implications for housing need provides an updated indicative figure for affordable housing in the National Park.	No – The plan still does not require specific figures for housing delivery, but takes an exceptions approach to housing development.