



## **PARTNERSHIP PLAN 2025-2030**

# **SUSTAINABILITY APPRAISAL (SA) (incorporating Strategic Environmental Assessment, Health Impact Assessment, Equality Impact Assessment, Habitats Regulations Screening) SA REPORT**

**December 2024**

# EXMOOR NATIONAL PARK AUTHORITY PARTNERSHIP PLAN 2025-2030

## SUSTAINABILITY APPRAISAL (SA) (incorporating Strategic Environmental Assessment, Equality Impact Assessment, Health Impact Assessment, Habitats Regulations Assessment Screening)

### SA Report

date:	December 2024 Draft December 2024 Final	
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## 1.0 INTRODUCTION

### **Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA), Equality Impact Assessment (EqIA), Health Impact Assessment (HIA) & Habitats Regulations Assessment (HRA)**

- 1.1 **Sustainability Appraisal (SA)** is a systematic process that must be carried out during the preparation of local plans and spatial development strategies. The purpose of a SA is to promote sustainable development through assessing the extent to which an emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives<sup>1</sup>. SA must incorporate the requirements of Strategic Environmental Assessment (SEA).
- 1.2 **Strategic Environmental Assessment** is a similar systematic process that affords a high level of protection to the environment during preparation of plans that are likely to have significant effects on environmental factors. The requirement for SEA is set out in the UK SEA Regulations<sup>2</sup>. Exmoor National Park Authority (ENPA) has chosen to undertake a SA incorporating SEA of the Exmoor National Park Partnership Plan (ENPPP) in order to investigate wider socio-economic factors.
- 1.3 In addition, ENPA has chosen to integrate the **Equality Impact Assessment (EqIA)** process within the overarching SA/SEA process. Public bodies have a duty to assess the impact of their policies on different population groups to ensure that discrimination does not take place and where possible, to promote equality of opportunity. **Health Impact Assessment (HIA)** is not a statutory requirement for public bodies but it is good practice in plan-making; health considerations are a requirement of the SEA process and thus the overall SA process.
- 1.4 It may be noted that under planning reform through the Levelling Up & Regeneration Act (LURA, 2023)<sup>3</sup> there are changes to environmental assessment requirements. A new system with Environmental Outcomes Reports (EORs) will replace the current processes of SEA and its associated project level environmental impact assessment (EIA). The Government plans to undertake further consultation and publish regulations for EORs in 2025.
- 1.5 EORs are proposed to include a new regime for screening plans and projects with clearer criteria for what requires assessment. As now, all projects in, or partly within, sensitive areas such as protected sites will require environmental assessment. However, it is likely that the Exmoor National Park Partnership Plan

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<sup>1</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

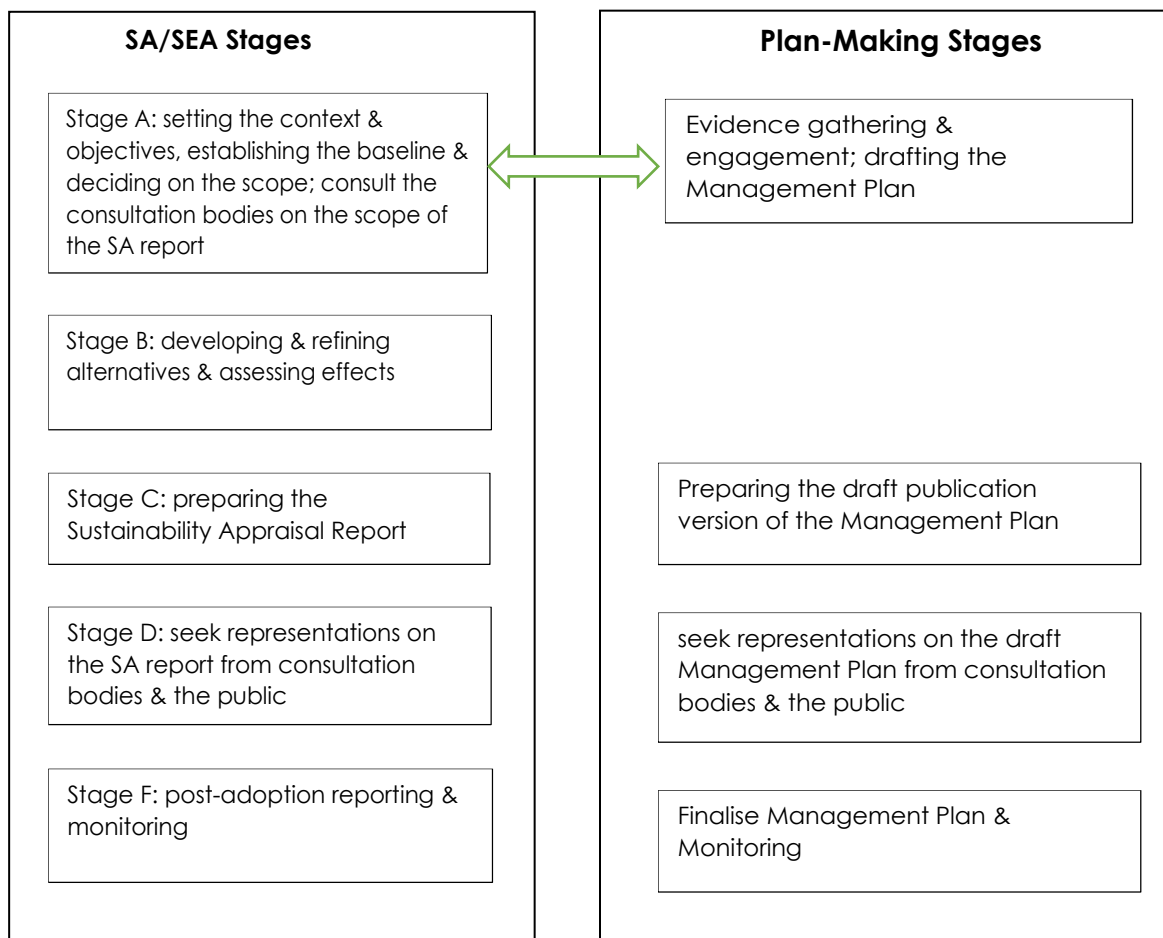
<sup>2</sup> Environmental Assessment of Plans and Programmes Regulations 2004, implementing the requirements of the EU Directive 2001/42/EC

<sup>3</sup> <https://www.legislation.gov.uk/ukpga/2023/55>

2025-2030 (ENPPP) will be prepared and consulted upon during the extant system and according to established procedures for SEA assessment.

- 1.6 The ENPA is also required to undertake a **Habitats Regulations Assessment**/Appropriate Assessment (HRA/AA)<sup>4</sup> of the Exmoor Partnership Plan. The aim of the HRA process is to assess the potential effects arising from a plan against the nature conservation objectives of any site designated for its nature conservation importance. The HRA process has its own legislative drivers and requirements and while the different processes can inform each other, it is important that the HRA remains distinguishable from the wider SA process. The HRA screening stage considers if the potential impacts arising as a result of a plan are likely to have a significant effect on these sites either alone or in combination with other plans and projects. If a risk of Likely Significant Effects (LSEs) is identified, then the process should progress to the Appropriate Assessment (AA) stage.
- 1.7 National Planning Practice Guidance sets out the key stages and tasks for the SA process and their relationship with the Local Plan process – as illustrated in the following Figure 1.1. These key stages and tasks are applicable to the SA process for the ENPPP.

**Figure 1.1: SA & Plan-Making Stages**



<sup>4</sup> <https://www.gov.uk/guidance/appropriate-assessment>

- 1.8 It is important to note that SA is an iterative and on-going process. Stages and tasks in the SA process may be revisited or updated or revised as a plan develops, to take account of updated or new evidence as well as consultation responses.
- 1.9 The ENPA has commissioned independent specialist consultants Enfusion Ltd to undertake the SA process for the Review of the Exmoor National Park Partnership Plan (2025-2030).

## The Exmoor National Park Partnership Plan (ENPPP) 2025-2030

- 1.10 National Park Authorities are required<sup>5</sup> to produce a plan for the management of their Park and for the carrying out of its functions. In recognition of the partnership approach needed to develop and deliver the objectives of the plan, Exmoor National Park Authority refers to this as the 'Partnership Plan'. Exmoor National Park Authority is undertaking a review<sup>6</sup> of the current Partnership Plan (2018-2023) for the Exmoor National Park. The review of this plan is to identify key issues and opportunities, and the focus for partnership action over the next 5 years. The review covers the period 2025-2030 with a long-term Vision, Objectives and Targets that extend through to 2050.
- 1.11 A draft Plan will be produced and there will be a public consultation –in early 2025 – before the ENPPP is formally adopted by the ENPA – anticipated in summer 2025.
- 1.12 Fundamental to the review of Partnership Plan are the two statutory<sup>7</sup> purposes of the National Park designation:
- to conserve and enhance the natural beauty, wildlife and cultural heritage
  - to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public

Also, the duty of National Park Authorities in pursuing National Park purposes:

- to seek to foster the economic and social well-being of local communities (within the National Park) by working closely with the agencies and local authorities responsible for these matters
- 1.13 The location of the Exmoor National Park and Partnership Plan area, is shown in Figure 1.1 as follows:

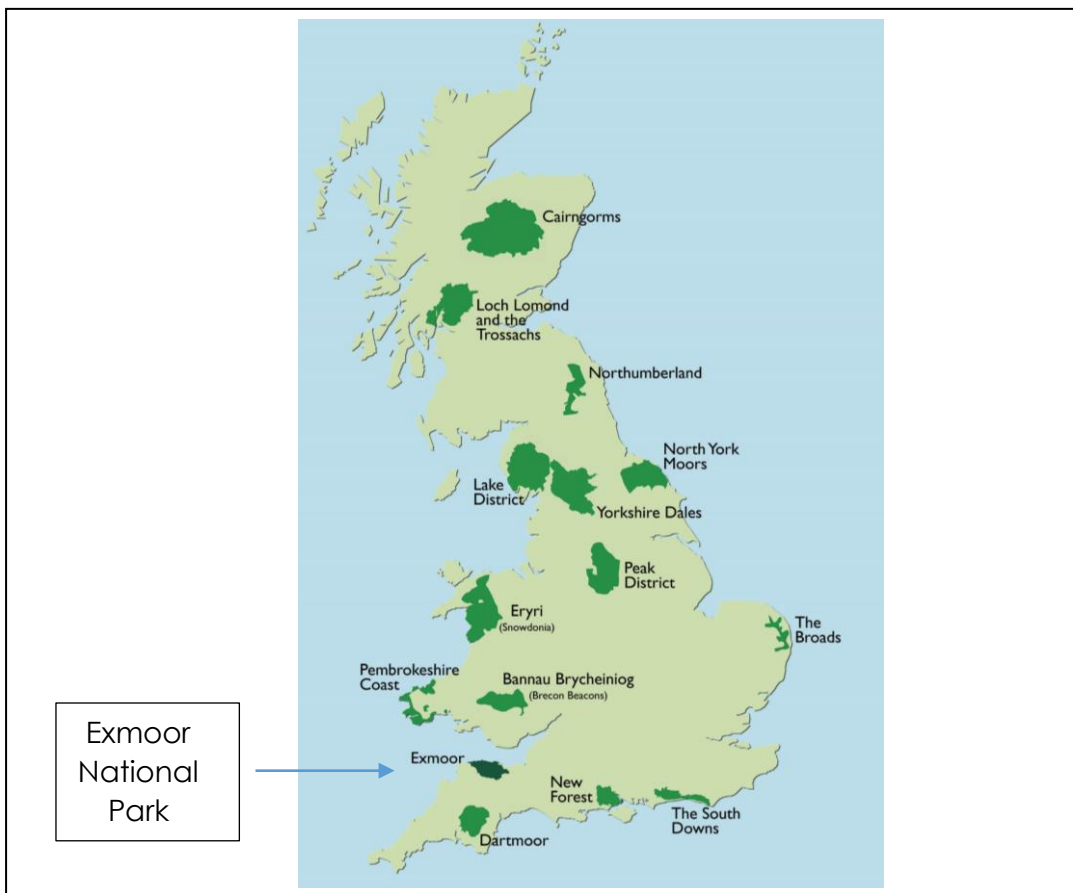
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<sup>5</sup> <https://www.legislation.gov.uk/ukpga/1995/25/section/66> Environment Act (1995) s66

<sup>6</sup> <https://www.exmoor-nationalpark.gov.uk/enpa/key-documents>

<sup>7</sup> National Parks & Access to the Countryside Act 1949 as amended by the Environment Act 1995

**Figure 1.1- Location of Exmoor National Park<sup>8</sup>**



1.14 During 2023, the ENPA gathered evidence on the state of Exmoor's special qualities, and canvassed views through a public opinion survey and workshops with delivery partners, including a Next Generation event for the 18-45 age group. It was decided to develop a new bold Vision for the National Park that would set the overall framework for management extending to 2050 and within which a focus could be developed for the five years 2025-2030.

1.15 The Partnership Plan sits alongside the Exmoor National Park Local Plan<sup>9</sup> (ENPLP to 2031) that provides the statutory planning framework for decisions regarding development and the use of land. Both Plans are designed to help deliver the statutory purposes of the National Park. The decisions that the ENPA makes in relation to planning are also an important element of how the Partnership Plan will be delivered. The preparation of the ENP Local Plan and the current Partnership Plan<sup>10</sup> (2018 -2023) were informed by Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA).

<sup>8</sup> Exmoor National Park Authority

<sup>9</sup> <https://www.exmoor-nationalpark.gov.uk/planning/planning-policy/local-plan>

<sup>10</sup> [https://www.exmoor-nationalpark.gov.uk/\\_data/assets/pdf\\_file/0017/251162/Partnership-Plan-2018-2023-spreads.pdf](https://www.exmoor-nationalpark.gov.uk/_data/assets/pdf_file/0017/251162/Partnership-Plan-2018-2023-spreads.pdf)

- 1.16 The ENPPP is a statutory plan that is for the whole National Park, not just the NPA and, as such, it is for the partner organisations, Exmoor's land and property owners and managers, the people who live and work in the National Park, and for the wider public.
- 1.17 The statutory Management Plan covers the period 2025 to 2030 but its vision, objectives and targets extend to 2050. The proposed **ENPPP Vision** is, as follows:

*“Exmoor National Park is a beautiful landscape, leading the response to climate change and nature recovery. It is a place where nature can thrive, that’s proud of its cultural heritage, welcoming to all who seek out inspiration and adventures, and where people can connect with this special landscape. It is home to thriving communities, with a low carbon economy benefitting from Exmoor’s natural and cultural capital.”*

- 1.18 The review of the Partnership Plan continues on from the previous Partnership Plans with updating and refinement of strategic ambitions/aims. The proposed strategic Aims and Objectives are, as follows:

**Aim A: A cared for landscape & heritage**

**Objectives:**

- Exmoor’s unspoilt natural beauty, tranquillity, openness, wildness and dark night skies are celebrated, looked after, and enjoyed
- Exmoor’s irreplaceable historic environment and cultural heritage is cared for, celebrated and plays a key role in informing our future

**Aim B: A nature-rich landscape**

**Objectives:**

- Habitats Exmoor’s rich mosaic of wildlife habitats is enhanced, extended, resilient and well-connected, forming a network of nature-rich areas with blurred edges, corridors linking them and stretching across the National Park boundary
- Wildlife is thriving with a greater abundance of species that can easily move across the landscape and adapt to a changing climate

**Aim C: A net zero National Park, mitigating and adapting to climate change**

**Objectives:**

- Exmoor is a net zero National Park, reducing greenhouse gas emissions to a minimum level and locking up carbon in peatlands, trees, soils and plants
- Exmoor’s natural and historic assets, local communities and businesses are adapted and resilient to climate change



**Aim D: A welcoming place for all, that people feel connected to, improving their health and well-being**

**Objectives:**

- More people are connected with, inspired by, and care for Exmoor, improving their health and well-being and providing a “Natural Health Service”
- Public paths, open access land, recreational facilities and popular sites are well maintained and accessible for all to experience and enjoy Exmoor
- Exmoor is promoted and managed as a regenerative tourism destination, providing a great visitor experience, leaving the environment in a better state, and positively contributing to the well-being of local communities
- There are more opportunities for young people from all backgrounds to explore and connect with Exmoor, developing skills and knowledge, and taking an active role in the future of Exmoor

**Aim E: Healthy Natural Resources**

**Objectives:**

- Exmoor’s soils, air and water resources are healthy and support naturally functioning ecosystems

**Aim F: A great place for people to live, work and do business**

**Objectives:**

- Exmoor’s communities and economy are sustainable and resilient, supporting the transition to a low carbon economy and lifestyles, and providing new opportunities, skills and employment

**Aim G: Bringing it all together – place based delivery**

**Objectives:**

- Exmoor’s distinctive **moorland and farmed** landscapes are evolving and resilient to climate change. Their natural beauty is enhanced and heritage conserved. Habitats are more diverse, in better condition, extended, connected and richer in wildlife. Some areas are wilder and natural processes are restored. Land is managed sustainably to produce high quality food and timber. People can access and enjoy these special places including the tranquillity and dark night skies
- Exmoor’s **woodlands and tree cover** are diverse, well-managed, expanded, better connected, more resilient, and productive. They enhance the natural beauty, wildlife, cultural heritage and enjoyment of the National Park and play a major role in responding to climate change

- Exmoor's **wetlands, rivers, streams** and their associated valleys are in good condition and function more naturally. Their native flora and fauna is thriving, and flood risk is reduced. Access is managed sensitively
- Exmoor's stunning coast has access opportunities for all, where people and nature can thrive, heritage is conserved, and we build resilience to coastal change

## Consultation & Engagement

- 1.19 The ENPA has engaged widely with key partners throughout the review of the Partnership Plan, including through their website. The draft SA Scoping Report was sent to the statutory environmental bodies – Environment Agency, Historic England and Natural England for the 5-week consultation period finishing on 20 October 2023. Comments were received from Historic England and Natural England – these are set out in Appendix A of the Final SA Scoping Report (October 2023) together with the responses made. The Initial HRA Screening Report (September 2023) was sent to the relevant environmental body, Natural England, and the updated HRA Screening Report will be sent to NE for consultation early 2025.

## Compliance with the Requirements of the EU SEA Directive

- 1.20 The Strategic Environmental Assessment Regulations set out certain requirements for reporting the SEA process and specify that, if an integrated appraisal is undertaken (i.e. SEA is subsumed within the SA process), then the sections of the SA Report that meet the requirements set out for reporting the SEA process must be clearly signposted. This SA Report presents the SA/SEA testing of the draft Partnership Plan, includes a Non-Technical Summary, and an appendix that clearly signposts the requirements for reporting the SEA.

## This SA Report

- 1.21 This document reports the SA/SEA process for the Exmoor National Park Partnership Plan Review. Following this introductory Section 1, this report is structured into further sections:
- Section 2 describes the approach and methods used to appraise the emerging elements of the Plan, including how consideration of reasonable alternatives has been addressed
  - Section 3 summarises the sustainability context and characteristics with details available in the Final SA Scoping Report (October 2023) and on the ENPA website
  - Section 4 summarises the findings of the SA of the draft Vision, Aims and Objectives, and it integrates the summary findings from the HRA and EqIA
  - Section 5 introduces the approach to monitoring and the SA

- Section 6 provides summary conclusions from the SA, sets out the requirements for consultation and commenting on the report, and explains the next steps.
- 1.22 Appendix I comprises the Statement of Compliance with the SEA Regulations and provides signposting to where key aspects of the SA are located in the SA Report. Appendix II is the SA Scoping Report (available separately <https://www.exmoor-nationalpark.gov.uk/enpa/key-documents/partnership-plan-2025-consultation>) and including the details of the baseline evidence, identification of issues and opportunities, and the development of the SA Framework for assessment. Appendix III (also available separately) is the Equality Impact Assessment (EqIA) Screening Report. The HRA Screening Report is provided separately – its findings have been incorporated into this SA Report.

## 2.0 SUSTAINABILITY APPRAISAL METHODS

### Introduction & the SA/SEA Process

- 2.1 Sustainability Appraisal incorporating Strategic Environmental Assessment is an iterative and ongoing process that aims to provide a high level of protection for the environment and to promote sustainable development for plan-making. The role of SA is to inform the ENPA as the plan-making authority; the SA findings do not form the sole basis for decision-making – this is informed also by other studies and especially through engagement. SA is a criteria-based assessment process with objectives aligned with the issues for sustainable development that are relevant to the plan and the characteristics of the plan area.
- 2.2 There is a tiering of assessment processes that aligns with the hierarchy of plans – from international, national and through to local. Planning guidance advises<sup>11</sup> that the SA should focus on what it needed to assess the likely significant effects of a plan. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the plan. This SA has taken a proportionate and pragmatic approach.
- 2.3 This SA is an Integrated Appraisal that has incorporated the requirements of the EU SEA Directive. It also integrates the findings from the Habitats Regulations Assessment (HRA) screening, and the findings of the Equality Impact Assessment (EqIA). Since the HRA and the EqIA are driven by distinct legislation, the HRA Report and the EqIA Report are also provided separately to clearly demonstrate compliance.

### Scoping & the SA Framework

- 2.4 Relevant key plans and programmes (PP) were reviewed, baseline information was identified, collated and analysed to ensure that key issues, problems and opportunities for the ENPA area were identified. The details of this analysis are presented in final SA Scoping Report (October 2023) and a summary is provided in the following Section 3 of this SA Report.
- 2.5 The SA Framework provides the basis by which the sustainability effects of the Exmoor National Park Partnership Plan Review are described, evaluated and any options compared. It includes sustainability objectives, elaborated by decision making criteria, that are relevant to the objectives of the Partnership Plan, the role and duties of the Exmoor NPA, and sustainable development in the Exmoor area. These objectives have been identified through the SA Scoping Stage from the information collated in the PP review, baseline analysis, identification of sustainability issues, and discussions with ENPA

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<sup>11</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

Officers. The SA Framework drew upon the scoping for the SA of the ENPA Local Plan and built further upon the previous SA undertaken of the current Partnership Plan.

2.6 The SA Framework is presented in Table 2.1 below and was used to test the draft plan.

**Table 2.1: SA Framework**

SA Objectives	Potential Indicators <sup>12</sup>
Sustainability Topic: <b>Landscape &amp; Natural Beauty</b> <i>SEA topics: landscape; flora, fauna, biodiversity</i>	
<b>1.</b> To conserve and enhance the special qualities and natural beauty of the National Park's landscape character (including seascape); and manage change especially for climate change with the strategic landscape and in the longer-term	Area & % of NP (usable agricultural area) under agri-environment schemes Loss or damage to key landscape features (woodlands, walls, hedges, hedgebanks)
<b>2.</b> To preserve the wild, remote & tranquil characteristics of Exmoor, including minimising light and noise pollution	% of National Park classified as either tranquil or very tranquil Impacts on Dark Sky Reserve
<b>3.</b> To protect and enhance sites of special geological interest and protect the landscape scale geology of Exmoor	% of geological SSSI in favourable or unfavourable recovering condition
Sustainability Topic: <b>Nature &amp; Biodiversity</b> <i>SEA topics: flora, fauna, biodiversity, landscape</i>	
<b>4.</b> To recover and enhance habitats, species and biodiversity networks for net gain and with a landscape-scale approach for nature recovery	% of SACs and broad habitats in SSSIs in favourable or unfavourable condition % of key species whose status is stable or increasing Biodiversity Net Gain metric Develop an indicator for monitoring nature recovery
<b>5.</b> To recover and enhance natural and semi natural woodlands & moorland areas	Area and % of woodland under active management Area under active peatland restoration % priority wetland habitats in favourable condition
Sustainability Topic: <b>Historic Environment &amp; Cultural Heritage</b> <i>SEA topics: cultural heritage, architectural &amp; archaeological heritage, landscape</i>	
<b>6.</b> To conserve, and enhance the historic environment (including designated & non-designated heritage assets) of sites, areas,	% of Scheduled Monuments at risk % of Listed Buildings at risk

<p>buildings &amp; landmarks of archaeological, historic, cultural and/or architectural interest and their settings</p>	<p>No. of Conservation Areas with up to date appraisals and management plans Restoration of archaeological assets Archaeological surveys conducted <i>Measures to conserve &amp; enhance heritage assets &amp; their settings, including settlements, farmsteads, buildings &amp; archaeology</i> Adverse impacts on archaeology &amp; other paleoenvironmental deposits are avoided or mitigated</p>
<p><b>7.</b> To support cultural heritage including local traditions, <i>building &amp; craft knowledge &amp; skills</i> and improve access and understanding of local heritage</p>	<p>No of agricultural shows &amp; local fairs within the National Park or serving it <i>Initiatives to promote traditional craft skills, heritage education &amp; sustainable tourism</i></p>
<p>Sustainability Topic: <b>Natural Resources</b> <i>SEA Topic: air, water, soil, biodiversity, material assets, human health</i></p>	
<p><b>8.</b> To protect and improve air quality; promote water efficiency &amp; improve water quality; reduce waste</p>	<p>Nitrogen deposition &amp; exceedances on the SACs Length &amp; % length of monitored rivers achieving good or high ecological status (under WFD) % under sustainable waste management</p>
<p><b>9.</b> To protect and conserve soil, land and minerals, reduce soil erosion and protect soil quality</p>	<p>Area &amp; % of Park under agri-environment schemes Extent of path erosion <i>Quantity &amp; Quality of peatland with implications for climate change, land &amp; water management, heritage &amp; culture</i></p>
<p>Sustainability Topic: <b>Climate Change</b> <i>SEA Topics: climate change, climatic factors, air, flood risk, water, human health</i></p>	
<p><b>10.</b> To minimise Exmoor's contribution to climate change including through carbon storage &amp; sequestration, energy efficiency, and maximise potential for renewable energy technologies</p>	<p>Amount of carbon sequestered through peatlands, boglands, soils &amp; woodlands</p>

	Number of applications & permissions for micro-renewable energy by type
<b>11.</b> To reduce the risk of flooding from all sources and manage flood risk more sustainably	Number of planning permissions granted contrary to EA advice Extent of natural flood management restored
<b>Sustainability Topic: Economy &amp; Employment</b> <i>SEA topics: population, human health</i>	
<b>12.</b> To promote and support a sustainable economy, particularly of key business sectors (tourism, agriculture, leisure/recreation, small businesses), and to utilise employment land & premises effectively and efficiently	Business start-ups & survival rates Unemployment rate % occupancy in holiday accommodation Use of local products & services Numbers of home working
<b>Sustainability Topic: Communities, Health &amp; Equality</b> <i>SEA Topics: population, human health</i>	
<b>13.</b> To ensure that the needs of all National Park residents are met for affordable housing & access to good quality services & facilities	Number and % of housing built per year that is for affordable housing needs
<b>14.</b> To promote sustainable transport, reduce traffic congestion & noise, and improve safety, health & air quality by reducing the need to travel, especially by car	Increase in cycleways & footpaths % length of public rights of way that are easy to use
<b>15.</b> To safeguard and improve community health, safety and wellbeing	IMD & health data % of Exmoor residents very or fairly satisfied with their local area as a place to live
<b>16.</b> To promote inclusiveness, equality and participation and take account of the needs of all sectors of the community in understanding and enjoying the special qualities of the National Park	Total number of volunteer days attended by unrepresented groups – young people (5-24); minority ethnic groups; people with limiting long-term illness or disability

2.7 The categories of significance used with the SA Framework are set out in the key below.

**Table 2.2: SA Significance Key**

Categories of Significance		
	Meaning	Sustainability Effect
++	Major Positive	Plan element encouraged as would it resolve existing sustainability problem

<b>+</b>	Minor Positive	No sustainability constraints and plan element acceptable; Some opportunity for improvement
<b>+/-</b>	Positive & Negative	Some positive effects but also some potentially negative effects
<b>0</b>	Neutral	Neutral effect
<b>?</b>	Uncertain	Uncertain or Unknown Effects
<b>-</b>	Minor Negative	Potential sustainability issues: mitigation and/or negotiation possible
<b>--</b>	Major Negative	Problematical, improbable because of known sustainability issues; mitigation likely to be difficult and/or expensive

## Appraising the Exmoor National Park Partnership Plan

- 2.8 The plan Vision was appraised for compatibility with the framework of SA Objectives. Each of the seven Aims with their Objectives of the draft plan were appraised against the SA Framework using professional judgment supported by the baseline information. The nature of the likely sustainability effects (including major/minor, positive/negative, duration (short, medium or long term), permanent/ temporary, secondary<sup>13</sup>, cumulative<sup>14</sup> and synergistic<sup>15</sup>) were described where possible in the appraisal commentary, together with any assumptions or uncertainties. Where necessary, the SA made suggestions and recommendations to mitigate negative effects or promote opportunities for enhancement of positive or neutral effects.
- 2.9 The SA framework grouped the SA Objectives into sustainability topics in order to better consider inter-relationships and enhance the meaningfulness of the assessment of the strategic level management plan, as follows:
- Landscape, Seascape & Natural Beauty
  - Nature & Biodiversity
  - Historic Environment & Cultural Heritage
  - Natural Resources
  - Climate Change
  - Economy & Employment
  - Communities, Health & Equality
- 2.10 The appraisal under each topic considered the potential effects of the Themes of the plan against the SA objectives as well as the interrelationships between topics and cumulative effects of the plan as a whole (and as required by SEA Regulations). This also avoids duplication as many factors are inter-related.

<sup>13</sup> Any aspect of a plan that may have an impact (positive or negative), but that is not a direct result of the proposed plan.

<sup>14</sup> Incremental effects resulting from a combination of two or more individual effects, or from an interaction between individual effects – which may lead to a synergistic effect (i.e. greater than the sum of individual effects), or any progressive effect likely to emerge over time.

<sup>15</sup> These arise from the interaction of a number of impacts so that their combined effects are greater than the sum of their individual impacts.



## Assessment of Alternatives in SA/SEA

- 2.11 The EU SEA Directive<sup>16</sup> requires assessment of the likely significant effects of implementing the plan and “reasonable alternatives” taking into account “the objectives and geographical scope” of the plan, and the reasons for selecting alternatives should be outlined in the Report. The Directive does not specifically define the term “reasonable alternative”; however, UK SA/SEA guidance<sup>17</sup> advises that reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made.
- 2.12 The ENPA is limited in the strategic options possible to investigate since it must comply with the requirements of its statutory designation as a National Park. The ENPA is required to prepare a Management Plan and therefore, the do-nothing scenario is not an option, but the baseline characterisation has considered the implications of not having a plan and aligned with sustainability topics. Management of the National Park has required careful negotiation of potentially competing interests and needs – within the overall statutory requirements and duties.
- 2.13 It was determined that there were no suitable or meaningful approach options for the Plan to consider and no meaningful or reasonable alternatives for the SA to consider. The Partnership Plan has developed with a strong recognition of the major cross-cutting factors involved – the need for nature recovery at the landscape scale and the need to address the predicted effects of climate change. Alternative approaches were not sufficiently distinct to enable any meaningful comparative assessments.

## Health Impact Assessment and Equality Impact Assessment

- 2.14 Health Impact Assessment (HIA) is not a statutory requirement for public bodies but it is good practice in plan-making; health considerations are a requirement of the SEA process and thus the overall SA process. The SA Framework (Table 4.1) and sustainability topics contain several direct and indirect links to health and equality, especially SA Objective No 13 Access, SA No 14 Transport, SA No 15 Health & Wellbeing, SA No 16 Inclusivity & Equality; also SA No 8 Air, Water Quality, SA No 10 Climate change, SA No 11 Flood Risk.
- 2.15 The Equality Act (2010) recognises nine protected characteristics as follows: age; disability; gender reassignment; marriage or civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation. The Partnership Plan is limited in what protected characteristics may be influenced; however, consideration of effects on equality and health were made throughout the SA process. In order to demonstrate compliance with the Equality Act 2010, a

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<sup>16</sup> <http://ec.europa.eu/environment/eia/sea-legalcontext.htm>

<sup>17</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

separate screening was carried out and presented as a technical Appendix III to this SA Report; the emerging ENPPP Themes were assessed against each of the protected characteristics. An EqIA demonstrates how the Authority has met with the Public Sector Equality Duty (PSED) as set out under Section 149 of the Equality Act 2010.

## **Habitats Regulations Assessment (HRA) & Appropriate Assessment (AA)**

- 2.16 The Habitats Regulations<sup>18</sup> transpose European requirements that aim to protect habitats and species of European nature conservation importance. The Directive establishes a network of internationally important sites designated for their ecological status. These are referred to as Natura 2000 sites or European Sites and comprise Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) which are designated under European Directive (2009/147/EC) on the conservation of wild birds [the Birds Directive].
- 2.17 The aim of the HRA process is to assess the potential effects arising from a plan against the nature conservation objectives of any site designated for its nature conservation importance. The HRA screening stage considers if the potential impacts arising as a result of a plan are likely to have a significant effect on these sites either alone or in combination with other plans and projects. If a risk of Likely Significant Effects (LSEs) is identified, then the process should progress to the Appropriate Assessment (AA) stage.
- 2.18 The HRA of the ENP Partnership Plan Review was undertaken alongside the SA with the findings of the HRA informing the SA. An Initial HRA Screening Report (September 2023) was prepared and sent to the statutory consultee (Natural England) at the same time as the SA Scoping Report. This Initial HRA screening was revisited and the screening assessment was refined taking into account the detail of the proposed ENPPP that has been developed. The HRA report will be placed on consultation for the wider public alongside the SA and the draft Partnership Plan, and will also be sent to Natural England.

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<sup>18</sup> The Conservation of Habitats and Species Regulations (as amended) (2010) [the Habitats Regulations]

## 3.0 SUSTAINABILITY CONTEXT, OBJECTIVES & BASELINE CHARACTERISTICS

### Introduction

- 3.1 In order to establish a clear scope for the SA of the Exmoor National Park Partnership Plan Review, it is necessary and a requirement of SEA, to review and develop an understanding of the baseline characteristics and conditions of the plan area and the wider range of plans and programmes that are relevant to the plan. The SA Scoping Report (October 2023) considered and reported baseline conditions for the plan area, as well as reviewing Plans and Programmes that may affect or be affected the management proposed in the ENPPP. Analysis of this information allowed the SA to identify the key issues and opportunities for sustainable development in the Exmoor area and create sustainability objectives to address these key issues. Full details can be found in the final SA Scoping Report that comprises Appendix II of this SA Report (and available separately through the ENPA website). A summary of the implications of other plans for the ENPPP and the SA is presented in the following section, together with an outline of the baseline characterisation.

### Implications of other Plans/Programmes for the Partnership Plan and SA

- 3.2 The UK 25-year Environment Plan (2018) made the commitment to reviewing National Parks and AONBs in consideration of the need to conserve and enhance natural beauty. The Final Report (September 2019) of the Designated Landscapes Review (the so-called Glover Report) identified that landscapes should be a positive force for improvement with big ambitions; more must be done for nature and beauty. More must be done for people who live in and visit our landscapes. National Parks should be leading on matters, such as natural beauty, climate change, and diversity. Government's Response (2022) includes a new partnership between National Landscapes teams and NP authorities; protected landscapes to be at the heart of delivering nature recovery and climate policies, and reflected in environmental land management schemes.
- 3.3 The Protected Landscapes and Outcomes Framework (January 2024)<sup>19</sup> sets the ambition for how Government expects Protected Landscapes to achieve three outcomes from the Environmental Improvement Plan (2023): Goal 1: Thriving plants and wildlife; Goal 7: Mitigating and adapting to climate change; Goal 10: Enhancing beauty, heritage and engagement with the natural environment. The criteria aim to set a clear, consistent standard for land contributing towards 30by30, both within and beyond Protected Areas. 30by30 areas will need to meet these criteria, whether they are within or

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<sup>19</sup> <https://www.gov.uk/government/publications/protected-landscapes-targets-and-outcomes-framework/protected-landscapes-targets-and-outcomes-framework>

outside of a Protected Area. have developed 3 criteria that land needs to meet to contribute towards 30by30 in England. These focus on 3 themes: Purpose; Protection; Management.

- 3.4 In 2020, the government committed to protecting 30% of the UK's land and seas by 2030 (30by30) and this supports the global 30by30 target agreed at the UN Biodiversity Summit (COP15) in 2022. The commitment to this international target is enshrined within the 2023 Environmental Improvement Plan<sup>20</sup>, which is currently under review.
- 3.5 Recently Government (December 2024)<sup>21</sup>, marking the 75<sup>th</sup> anniversary of the NP Act, advised that new legislation and guidance will given to National Parks and National Landscapes with a clear mandate to widen the public's access to nature through strengthened purposes and make changes to improve their governance that will allow for greater innovation and collaboration to prepare them for the future – thus ensuring that protected landscapes will be fit for the future. This will include developing new regulations to ensure that public bodies and organisations, such as water companies, deliver better environmental outcomes.
- 3.6 Plans aiming to recover, conserve, enhance and manage biodiversity, landscape character, and the historic environment are all key for Exmoor, as these factors represent why the area has been designated as a National Park. The first purpose of the National Parks is to conserve and enhance these aspects of the environment. Plans relating to the water environment are key, as the many rivers and streams which flow from Exmoor are an integral part of the environment for the National Park. The Partnership Plan should aim to help achieve both national and local objectives by minimising negative effects on the natural and historic environment, and the highly valued landscapes, and seeking enhancements. The objectives from the Glover Report for National Parks to take a lead and be ambitious are important in these respects, as well as objectives to build resilience to climate change. The UK Nature Recovery Network (2024) requires a growing national network of wildlife rich places, supported by green and blue spaces that buffer and connect these wildlife rich sites.
- 3.7 Objectives relating to Green Infrastructure, recreation and health/wellbeing are very relevant, as the Partnership Plan will promote aims and priorities for access thus meeting the second purpose of the National Park to promote understanding and enjoyment of the National Park. There is a potential inherent policy objective conflict between objectives for recreation and wildlife, which is highlighted in the Sanford Principle. The Sanford Principle<sup>22</sup> specifies that if there are conflicts between conservation and public enjoyment that cannot be reconciled, then the National Park authority must ensure that the conservation issue takes priority. There are challenging implications for the ENPPP from the proposals in the Glover Report for National

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<sup>20</sup> <https://www.gov.uk/government/publications/environmental-improvement-plan>

<sup>21</sup> <https://www.gov.uk/government/news/protected-landscapes-to-be-strengthened-with-new-legislation-and-guidance-to-protect-nature>

<sup>22</sup>

<http://www.nationalparks.gov.uk/students/whatisanationalpark/aimsandpurposesofnationalparks/sanfordprinciple>

Parks to encourage more diverse and first-time visitors. For example, increasing access could have adverse impacts on tranquillity.

- 3.8 Plans relating to economy and employment will be considered by the Partnership Plan to help achieve local, regional and national objectives. Emerging objectives for farming and food security with requirements for farming to provide “public goods” and embrace technological changes have important implications for the ENPPP, with strong interactions with objectives for natural beauty, resources management, and climate change resilience. The Glover Report recognises that the designated landscapes are largely farmed landscapes such that all protected landscapes should be priorities for the forthcoming Environmental Land Management Schemes (ELMS) payments delivering nature recovery, carbon management, access and other public benefits through farming. The transition to EMLS is still in progress and its implications are still uncertain, and the viability of upland farming remains a concern for Exmoor.
- 3.9 Plans and objectives relating to health/wellbeing and equality are important for the ENPPP to consider, including the requirements from the Glover Report that relate to increasing first-time visitors and increasing diversity. There is extensive evidence on the positive association between exposure to nature and health – physical and mental - and this has been further endorsed by diverse recent findings, for example, Natural England (2019)<sup>23</sup>, New Scientist (2021)<sup>24</sup> and BUPA (2023)<sup>25</sup>.
- 3.10 Plans relating to development growth could have significant implications for the Partnership Plan with potential increased pressures on the National Park that need to be managed. Increased recreational activities could result in negative effects on biodiversity and the natural environment but will provide strong positive effects for health and wellbeing, and can also provide economic benefits for the area. Increased road traffic could have negative effects for noise, tranquillity, light and air quality. New development being planned for the Exeter area could be an issue, together with the new development focused on the Taunton area. Exmoor and surrounding areas have not seen the same level of development as other areas in the south-west. However, this may change with the recent updating to the NPPF and changes to the method for calculating housing needs.
- 3.11 Plans relating to the climate change emergency have significant implications for the Partnership Plan, particularly with regard to ambitious targets for 2030 (the ENPA) and 2038 (the Exmoor NP). The impacts of climate change are evident now and the urgency of the need to reduce carbon emissions is likely to require a refocus for the ENPPP to better adapt to a changing climate and increasing resilience.
- 3.12 Plans relating to health and wellbeing, encouraging increased access and recreation in nature have implications for the ENPPP with potential conflicts

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<sup>23</sup> <https://naturalengland.blog.gov.uk/2019/07/12/two-hours-a-day-outside-is-vital-for-health-and-wellbeing/>

<sup>24</sup> <https://www.newscientist.com/article/mg24933270-800-green-spaces-arent-just-for-nature-they-boost-our-mental-health-too/>

<sup>25</sup> <https://www.bupa.co.uk/newsroom/ourviews/nature-wellbeing>

with local communities. High levels of second homes and holiday lets remain an issue; however, Exmoor's economy is dominated by the tourism sector.

- 3.13 Overall, the key implications for the ENPPP and its SA relate to addressing the potential conflicts between other objectives - especially those relating to climate change, increased access, enhancing the natural beauty, nature recovery, and maintaining farming and forestry, as well as the cultural heritage and communities of the National Park.

## Summary Baseline Character & Conditions

- 3.14 Exmoor National Park was designated in 1954 with an area of 267 square miles and is the fourth smallest UK National Park. National Parks are designated because of their special qualities<sup>26</sup>. The **Special Qualities** of Exmoor NP are associated with *a unique landscape of moorland, woodland, valleys and farmland, shaped by people and nature over thousands of years. Where high cliffs plunge into the Bristol Channel, and cosy pubs and tearooms offer delicious local produce. On Exmoor it is still possible to find tranquillity and peace as well as rediscover your sense of adventure; to catch a glimpse of wild red deer, be amazed by dark skies full of stars, and explore villages full of character.* The State of the Park report details the evidence and data on the condition and state of Exmoor NP Special Qualities.
- 3.15 The SEA Directive and UK Regulations require the collation of baseline information to provide a background to, and evidence base for, identifying environmental/sustainability problems and opportunities in the plan area and providing the basis for predicting and monitoring effects of the plan. The aim is to collect only relevant and sufficient data on the present and future state of the plan area to allow the potential effects of the plan to be adequately predicted. The SA/SEA guidance produced by Government<sup>27</sup> proposes a practical approach to data collection; plan-making and assessment processes share the same evidence base. This characterisation has primarily drawn upon the Exmoor State of the Park Report (draft June, 2023)<sup>28</sup> and detailed in the SA Scoping Report (October, 2023 and Appendix II of this SA Report). Summary characterisation is provided in the following paragraphs by SA topic.
- 3.16 **Natural Beauty, Landscape & Seascape:** Exmoor's landscape character derives from the long history of livestock farming which has produced a patchwork of fields enclosed by traditional field boundaries (hedgerows and high Devon hedge banks) surrounding the higher moor land which is distinguished by larger enclosures and some common rough grazing. Landscape monitoring shows incremental but evident change in the nature of the land cover and vegetation and the occurrence of man-made features.

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<sup>26</sup> <https://www.nationalparks.uk/what-is-a-national-park/>

<sup>27</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

<sup>28</sup> [https://www.exmoor-nationalpark.gov.uk/\\_data/assets/pdf\\_file/0027/473373/State-of-Park-Report-Summary.pdf](https://www.exmoor-nationalpark.gov.uk/_data/assets/pdf_file/0027/473373/State-of-Park-Report-Summary.pdf)

- 3.17 **Nature & Biodiversity:** Nature and biodiversity is wider than a focus on designated sites and opportunities may be sought for the plan for nature recovery and connectivity, including in the farmed areas through ELMS<sup>29</sup>. Within Exmoor National Park there are 2 European designated sites Special Areas of Conservation (SACs) relating to 18% of the National Park: Exmoor Heath SAC and Exmoor & Quantock Oak Woodlands SAC. There are 15 SSSIs, 3 National Nature Reserves, 519 Local Wildlife Sites, and 29 Priority Habitats with over 200 Priority Species – in total, these designations cover 38% of the National Park. Only 15% of SSSIs are in favourable condition, with 81% in unfavourable recovering condition (compared with average of 61% across England).
- 3.18 The Glover Report<sup>30</sup> acknowledged that our landscapes are largely farmed landscapes and suggests that a partnership with farming that promotes nature recovery is needed. Climate change also threatens the biodiversity of the National Park. Effects such as increased competition for limiting resources will harm wildlife populations, habitats will be lost due to extreme weather events and the seasonal changes occurring, and changes in the life cycles of agricultural pests will harm the agricultural industry.
- 3.19 There has been significant vegetation change on the moors over the last 40 years with less heather, more gorse, bracken and purple moor grass. There have been very few illegal burns and wildfires over the last few years but in 2022 there were a number of wildfires affecting over 300ha of moorland. Peatlands are important carbon stores and essential to meeting targets for responding to climate change. They are important habitats and peatland restoration is taking place on over 2,600ha of peatland.
- 3.20 **Historic Environment & Cultural Heritage:** It is important to remember that one of the statutory purposes of the National Park is to conserve and enhance cultural heritage. The archaeological landscape of Exmoor is extensive, as people have been using the landscape, and leaving their mark on Exmoor over the past 8,000 years. The various communities which have lived and farmed on Exmoor have not only shaped the physical landscape but have imposed their cultural practises and traditions in the form of Exmoor's cultural heritage. Exmoor has a variety of designated historic environment assets. Exmoor's nationally designated heritage is generally well cared for and in good condition, although there has been an increase in Listed buildings at risk. Damage from livestock, vehicles and vegetation encroachment remain the key risks for scheduled monuments and Principal Archaeological Landscapes PALs. Many assets remain undesignated and lack protection. Climate and coastal change bring risks to heritage assets.
- 3.21 **Natural Resources - Land, Water & Air:** Exmoor's geology is comprised of sandstones, slates and shales with peat; no mining is carried out in the ENP area. Farming is dominated by hill and upland farms, most operating extensive grazing livestock production systems. Water resources, water quality

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<sup>29</sup> Environmental Land Management Scheme, for example, please see <https://www.gov.uk/government/news/environmental-farming-scheme-given-green-light>

<sup>30</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/833726/landscapes-review-final-report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/833726/landscapes-review-final-report.pdf)

and flooding are all inter-related and need to be considered together for sustainable water management and to meet with the objectives of UK Regulations. The National Park is within the Roadford Water Resource Zone (WRZ) with water services provided by South West Water and overall the water available for use is predicted to be above the overall demand. Only half of monitored rivers and designated coastal or transitional water bodies are achieving 'high' or 'good' status. There is increasing incidence of extreme weather events damaging the Rights of Way network, with more frequent flash flood events which cause path surfaces to wash out, and more trees to clear from paths following storms.

- 3.22 Air quality on Exmoor is generally good but nitrogen deposition continues to exceed site relevant critical loads (APIS, 2020) and is an issue for maintaining the integrity of the designated SACs. Nitrogen deposition on Exmoor is not dominated by road traffic. The main sources of nitrogen deposition on the Exmoor SAC are livestock emissions through ammonia (NH<sub>3</sub>).
- 3.23 **Energy & Climate Change:** Emissions of greenhouse gases (GHGs) from residents are higher than the UK average due to a high level of retired people and consequent higher levels of spending on health; greater levels of flying and driving; and higher household fuel consumption for heating and electricity. Emissions from visitors while in the National Park are dominated by food (48%). Emissions from visitors travelling to/from the National Park is dominated by driving (62%) and reflects the relative remoteness of Exmoor. Industry emissions is dominated by agriculture, forestry and fishing (63%).
- 3.24 There is the potential to use different renewable energy sources within the National Park, such as wind power, solar power and hydro power; however, these can have negative effects on the special qualities of the National Park. The changes occurring as a result of climate change will have an impact on the agricultural industry and the ecology of the National Park. The moorland habitat of Exmoor is a key carbon store, and degradation of this habitat could have negative effects on climate change through the loss of a prominent carbon store. There are opportunities for mitigating climate change through land management changes and nature recovery, for example, peatland restoration, increasing soil carbon storage, and with more woodland planting.
- 3.25 **Economy and Employment:** Most businesses are micro (0-9 employees) and self-employment rates are significantly higher on Exmoor at 26.8% than in the UK (10.8%). GVA per capita is low compared to Devon and Somerset and other deeply rural areas in England. This is partly due to the low number of younger economically active people and the low productivity in key sectors such as tourism. Local businesses value the high quality environment of the National Park. There are high level of home based businesses and strong connections with local suppliers, which improves sustainability.
- 3.26 Farming is dominated by hill and upland farms and the number of farmworkers on Exmoor has remained relatively static over the last 10 years. There has been a fall in numbers of casual workers. The age structure among farmers appears healthy and there is a cohort of younger farmers with larger



holdings and an innovative and market-focused outlook. Exmoor's economy is dominated by the tourism sector and is primarily made up of micro-businesses. New technologies are changing the way markets and sectors work, and digital connectivity is more important than ever. The 2021 visitor survey shows that the age profile of visitors continues to be skewed towards older visitors.

- 3.27 **Economy & Employment:** Exmoor has a population of 10,284 people; the number of people living on Exmoor is declining and ageing. The majority of Exmoor is a sparse rural area – defined as 'rural hamlets or isolated dwellings in a sparse setting', or 'rural village in a sparse setting'. Only 3 settlements have populations of over 1,000 people (Dulverton, Porlock, Lynton & Lynmouth). These fulfil an important role as local service and tourism centres, serving a large catchment area.
- 3.28 Exmoor is one of the smallest National Parks in the UK, both in area and in population. It is remote from major centres of population, with no major road or rail access to the National Park. Exmoor house prices are substantially higher than regional and national averages, and wage levels are low, which means there is an affordability gap. There are few public transport links and the high cost of vehicle fuel impacts disproportionately on rural areas such as Exmoor.
- 3.29 **Communities, Health & Equality:** The Index of Multiple Deprivation rankings for Exmoor's communities have fallen since 2015, reflecting a worsening in the relative deprivation of Exmoor's communities compared to other areas of the country. 28% of households have at least one person with a long-term health problem or disability. Within Exmoor there are many pockets of rural poverty. Many minority ethnic and other under-represented communities do not visit or engage with the National Park.
- 3.30 There are few public transport links and the high cost of vehicle fuel impacts disproportionately on rural areas such as Exmoor. 96% of visitors use private car to visit Exmoor and 10% use public transport whilst in the National Park. With over 985km of Rights of Way Exmoor is a walker's paradise, and also has something to offer cyclists of all interests and abilities. Exmoor has a well-earned reputation as one of the best horse riding in the country.

## Key Sustainability Issues, Problems & Opportunities

- 3.31 The issues, problems and opportunities for progressing sustainability with the ENPPP are detailed in Appendix III (SA Scoping Report) and the key issues may be summarised, as follows:
- Need to deliver ambitious targets for addressing climate change
  - The special landscape needs to support all – residents, farmers, visitors, wildlife and natural resources
  - Potential conflicts between themes in the plan and need for balanced management, for example, nature recovery versus farming,

archaeology and access; pressures to increase woodland cover versus traditional farming with open, wild moorland; tranquillity, access and biodiversity; economy versus nature recovery

- Extent of nature recovery and rewilding
- Importance of rivers and peatlands with their roles in sustainable water management and climate change resilience
- Vibrant economy needed to enable Exmoor to be a living place encouraging increase in visitors, particularly young and a wider diversity

### Likely Evolution of Baseline without the Partnership Plan

- 3.32 Exmoor's natural beauty has led to it being designated as a National Park - and is enjoyed by locals and tourists alike. Without a plan, management changes have the potential to result in negative or positive effects on the natural beauty and landscape characteristics of Exmoor. For example, letting natural processes take their course with more trees and more natural river systems will change the landscape character but would it change the quality of the landscape or scenic beauty? However, with a Partnership Plan in place, strategic aims and objectives can guide activities in a more coordinated way seeking to minimise negative effects and optimise positive effects – this is particularly relevant to managing natural beauty at a landscape (strategic) scale and noting that the Government proposes that national landscapes should form the backbone of nature recovery.
- 3.33 Activities will be guided such that the key sensitive areas are protected, for example, priority habitats, priority species, and habitat linkages. The Plan can ensure areas of important biodiversity and geodiversity are given sufficient protection from harmful activities. It can also take a leading role to promote a nature recovery approach aligned with emerging changes to farming subsidies – nonetheless, the Plan will need to consider the implications of potential conflicts between nature recovery and rewilding aspirations including extensive tree planting and the retention of traditional farming communities. However, the tree planting can be part of farming too through wood pasture, in-field trees, hedgerow trees, orchards etc. And these will benefit farming too through providing shade, shelter, fodder.
- 3.34 Due to national policy, designated heritage assets would still be protected from negative effects without a plan. However, there are many non-designated heritage assets and potential historic assets that could be at risk from management changes in the National Park.
- 3.35 Without a plan, activities in the National Park could result in the loss of important soil resources, which is a national issue. Soil resources will still be used for grazing purposes, carbon storage, natural flood management, and nature recovery. Without a plan in the National Park, there is the potential for management activities to have negative effects on the water environment of Exmoor. With a plan, activities can be coordinated in a more strategic

manner that better supports aims for sustainable water management, including flood risk mitigation, and also, for air quality.

- 3.36 There is national policy relating to reducing greenhouse gas emissions, which would likely result in reduced energy consumption within the National Park; the ENPA has set ambitious targets to tackle climate change and its effects. Specific encouragement and support in the new ENPPP could promote a high level of energy efficiencies and stronger sustainability. The plan can promote more resilience to the effects of climate change through sustainable water management and nature recovery – and in a more strategic and coordinated manner.
- 3.37 Without the plan, there would be a potential failure to support economic growth and benefits to the National Park's communities. With the Plan, there are opportunities to support the change and adaptation that will be necessary for business and economic growth. Without the plan, changes to management activities could have negative effects on communities through affecting employment, services and facilities. Without the plan, health and equality issues in the National Park may be exacerbated, including the limited range of diversity of visitors; opportunities would not be realised. Without the plan, the high dependency of private vehicle use will persist, and there could be a reduction in sustainable transport use. Activities that promote sustainable transport will help resolve air pollution and congestion issues.

## 4.0 SA of the DRAFT EXMOOR NATIONAL PARK PARTNERSHIP PLAN 2025-2030

### Strategic Vision

- 4.1 The draft ENP Partnership Plan is founded on a concise Vision that has been crafted through workshops and engagement to synthesise the essence of the Exmoor National Park, as follows:

*“Exmoor National Park is a beautiful landscape, leading the response to climate change and nature recovery. It is a place where nature can thrive, that’s proud of its cultural heritage, welcoming to all who seek out inspiration and adventures, and where people can connect with this special landscape. It is home to thriving communities, with a low carbon economy benefitting from Exmoor’s natural and cultural capital.”*

- 4.2 The Vision recognises the inherent inter-relationships between climate change and nature recovery and by seeking to lead the response, it indicates likely positive effects for SA objectives on landscape, natural beauty and nature. Positive effects are further indicated through the vision for a place where nature can thrive and it is proud of its cultural heritage. The Vision recognises visitors, workers and residents connecting with the special landscape, and seeks a low carbon economy acknowledging that this must be based around Exmoor’s natural and cultural capital – thus, indicating likely positive effects for SA objectives on cultural heritage, natural resources, economy, and communities and health. Overall, there are no significant adverse effects identified and likely positive effects for SA topics. Importantly, the inter-relationships between sustainability topics is recognised.

### Strategic Aims & Objectives

- 4.3 The aspirational intentions for each Theme within the draft Partnership Plan were assessed using the SA Framework of objectives grouped by sustainability topic, the baseline information and professional judgment to consider the likely significant effects. The grouping of SA objectives by sustainability topic seeks to avoid duplication and to more clearly consider the inter-relationships between topics and any cumulative effects.

### **Landscape & Natural Beauty**

SEA Regulations Topics: *Landscape, Flora, Fauna, Biodiversity, Health*

Relevant SA Objectives:

- SA Objective 1: To conserve and enhance the special qualities and natural beauty of the National Park's landscape character (including seascape); and manage change especially for climate change with the strategic landscape and in the longer-term
- SA Objective 2: To preserve the wild, remote & tranquil characteristics of Exmoor, including minimising light and noise pollution
- SA Objective 3: To protect and enhance sites of special geological interest and protect the landscape scale geology of Exmoor

- 4.4 The Aim A – **A cared for landscape & heritage** will have major positive effects for SA objectives on landscape and natural beauty and these will be synergistic and cumulative in the longer term. The Objective for Exmoor's unspoilt beauty recognises the importance of (and interactions between) tranquillity, openness, wildness and dark skies and seeks that these characteristic qualities should be celebrated, looked after and enjoyed – again recognising the different uses and needs with major positive effects.
- 4.5 The Aim C **A net zero National Park** strongly recognises the importance of climate change effects on landscape and thus provides mitigation measures to contribute to reducing GHGs/locking up carbon in soils and to adapt with resilience to protect natural and historic assets.
- 4.6 The draft Plan includes limited reference to the geology of Exmoor National Park – it is only mentioned in the context of recognising that each settlement character with diverse vernacular building styles reflects local geology and traditions. It may be appreciated that natural resources – and natural beauty - arise fundamentally from the local geology.
- 4.7 The Aim **G Bringing it all together** recognises the four main landscape types – moorland & farmed; woodlands & tree cover; wetlands, rivers, & streams; and the coast – thus providing clarity, guidance and mitigation that ensures positive effects are aligned according to landscape qualities and character. The natural beauty is enhanced for moorland/farmed and woodland landscapes; wetlands/rivers, streams & the coastal landscapes are thriving – all confirming that opportunities for enhancement have been utilised and confirming likely major positive effects for SA objectives for natural beauty.

#### **SA Suggestion:**

- Geology could be explicitly referred to in a ENPPP Objective – either in Aim A or perhaps in Aim E

### **Nature & Biodiversity**

SEA Directive Topics: Biodiversity, Flora & Fauna; Health, Landscape  
Relevant SA Objectives:

- SA Objective 4: To recover and enhance habitats, species and biodiversity networks for net gain and with a landscape-scale approach for nature recovery
- SA Objective 5: To recover and enhance natural and semi natural woodlands & moorland areas

- 4.8 The Aim **B A nature-rich landscape** will have major positive effects for SA Objectives on nature and biodiversity and these will be synergistic and cumulative in the longer term. The importance of protecting and enhancing both designated and non-designated natural assets/capital in networks across the NP, together with their connectivities, is explicit in the Plan Objective. Major positive effects in the longer-term is further confirmed through the adaptation to a changing climate.

### **Historic Environment & Cultural Heritage**

SEA Regulations Topics: *Cultural Heritage, Architectural & Archaeological Heritage, Landscape, Health*

Relevant SA Objectives:

- SA Objective 6: To conserve, and enhance the historic environment (including designated & non-designated heritage assets) of sites, areas, buildings & landmarks of archaeological, historic, cultural and/or architectural interest and their settings
- SA Objective 7: To support cultural heritage including local traditions, building & craft knowledge & skills and improve access and understanding of local heritage

- 4.9 The Aim **A cared for landscape & heritage**. The Plan Objective for Exmoor's irreplaceable historic environment and cultural heritage seeks that these characteristic qualities should be cared for and celebrated, indicating mitigation to avoid/reduce any potential negative effects and optimising potential positive effects by aiming for a celebratory approach. It also asserts that the historic environment and cultural heritage should play a key role in informing Exmoor's future – indicating a proactive approach which is likely to have major positive effects on SA Objectives and in the longer-term. There are strong inter-relationships between the historic environment and cultural heritage – and these are clearly set out in the NPP Objective – with positive effects. The inter-relationships between the historic environment and wider factors is further referred to explicitly in Aim G Bringing it all together – confirming further positive effects.

- 4.10 The Aim **C A net zero National Park** strongly recognises the importance of climate change effects on landscape and thus provides mitigation measures

to contribute to reducing GHGs/locking up carbon in soils and to adapt with resilience to protect natural and historic assets.

**Natural Resources: Land, Water, Air**

SEA Regulations Topics: *Air, Water, Soil, Biodiversity, Material Assets, Health*

Relevant SA Objectives:

- SA Objective 8: To protect and improve air quality; promote water efficiency & improve water quality; reduce waste
- SA Objective 9: To protect and conserve soil, land and minerals, reduce soil erosion and protect soil quality

- 4.10 The Aim E **Healthy Natural Resources** will have major positive effects on SA Objectives for land, water and air. Importantly, the links with naturally functioning ecosystems is clearly set out in the Plan Objective, indicating further major positive effects for SA Objectives on natural beauty and nature – likely to be synergistic, cumulative and in the longer-term. A healthy naturally functioning environment is key to human health and wellbeing and therefore, positive effects are indicated for people, their health, the economy/employment, and their communities. Healthy natural resources will also contribute to positive effects in the longer term with regard to objectives for climate change. Other mechanisms will ensure that the historic environment is protected and neutral effects with regard to natural resources (for example, air quality can affect historic assets but this is not an issue for the ENP).

**Climate Change**

SEA Regulations Topics: *Climate Change, Climatic Factors, Air, Flood Risk, Water, Biodiversity, Health*

Relevant SA Objectives:

- SA Objective 10: To minimise Exmoor's contribution to climate change including through carbon storage & sequestration, energy efficiency, and maximise potential for renewable energy technologies
- SA Objective 11: To reduce the risk of flooding from all sources and manage flood risk more sustainably

- 4.11 The Aim C **A net zero National Park, mitigating and adapting to climate change** will have major positive effects for SA Objectives on climate change. These effects will be synergistic and cumulative in the longer term. The progress to net zero carbon will have positive effects for all SA Objectives since the achievement of net zero carbon will mitigate the extant issues and sustainability problems associated with each of the other sustainability themes.

### **Economy & Employment**

SEA Regulations Topics: Population, Health

Relevant SA Objectives:

- SA Objective 12: To promote and support a sustainable economy, particularly of key business sectors (tourism, agriculture, leisure/recreation, small businesses), and to utilise employment land & premises effectively and efficiently

- 4.12 The Aim F **A great place for people to live, work and do business** will have major positive effects for SA Objectives on economy/employment and communities and health – since sustainable work is known to be vital for health and wellbeing. The inter-relationships with a low carbon economy and lifestyles are recognised in the Plan Objective, thus indicating further positive effects.

### **Communities, Health & Equality**

SEA Regulations Topics: *Population, Health*

Relevant SA Objectives:

- SA Objective 13: To ensure that the needs of all National Park residents are met for affordable housing & access to good quality services & facilities
- SA Objective 14: To promote sustainable transport, reduce traffic congestion & noise, and improve safety, health & air quality by reducing the need to travel, especially by car
- SA Objective 15: To safeguard and improve community health, safety and wellbeing
- SA Objective 16: To promote inclusiveness, equality and participation and take account of the needs of all sectors of the community in understanding and enjoying the special qualities of the National Park

- 4.13 The Aim D **A welcoming place for all, that people feel connected to, improving their health and wellbeing** will have major positive effects for SA Objectives on communities and health. The Plan Objective seeking to provide a Natural Health Service makes explicit the role of the natural environment and the NP for people's health and wellbeing – setting out that more people will be connected with, inspired by, and care for indicates that aspirations will be delivered and also encourages people to be proactive.

- 4.14 Active living is essential for health and wellbeing and the Plan Objective to maintain paths and open access for all will facilitate access and help ensure the major positive effects – which are also likely to be synergistic and cumulative in the longer term. This will also support SA Objectives for sustainable transport. The Plan Objective that promotes regenerative tourism seeks to leave the environment in a better state and contribute positively to local communities. This recognises the potential adverse effects that may



arise from less thoughtful tourism and provides strong clear mitigation measures to avoid such negative effects.

- 4.15 The fourth Plan Objective aims for more opportunities for young people from all backgrounds – with positive effects for health and wellbeing, skills/education – again with synergy and cumulative effects in the longer-term. This indicates major positive effects to help resolve a key sustainability issue that had been identified with regard to young people.
- 4.16 Another key sustainability issue that had been identified relates to the need to engage with a wider diversity of people – and this is an acknowledged national issue. The draft ENPPP notes that inequality in the UK is at the highest level for over 50 years and that within Exmoor there are many pockets of rural poverty. The plan also notes that many minority ethnic and other under-represented communities do not visit or engage with the NP.
- 4.17 The Plan Objectives that promote regenerative tourism, responsible access and support for local economy and employment will all contribute to sustaining Exmoor NP and this could also contribute in some part to helping resolve inequalities. Aim D Objectives include “more people are connected”, “accessible for all”, “more opportunities for young people from all backgrounds” and these explicitly cite young people – with positive effects for SA Objectives. Whilst “from all backgrounds” does include those from minority ethnic and under-represented communities, it does not explicitly cite such groups such that opportunities to engage with such groups may not be fully explored.

**SA Suggestion:**

- Consideration is given to adding “minority ethnic and under-represented communities” (although it is appreciated that this would add more words to the concise and clear objectives)
- 4.18 The EqIA concluded that the screening assessment has found that draft Exmoor Partnership Plan is unlikely to have negative effects on protected characteristics or persons identified under the Equality Act 2010 and as a result a full EqIA will not be required.

## Implementation of the draft Plan

- 4.19 The implications of the plan as a whole were also investigated and reported, and as required by the SEA Regulations. The Plan **Aim G bringing it all together – place based delivery** integrates the management of the NP by landscape/habitat type which is an excellent approach and quite appropriate for a NPPP. Overall, the draft ENPPP will have major positive effects for SA Objectives on landscape/natural beauty and the historic environment/cultural heritage. Positive effects are also indicated for the other SA themes on Natural Resources, Climate Change, Economy/employment, and Communities, Health & Equality.

4.20 There were no significant adverse effects identified. The potential for some conflicts between aspirations has been recognised and explained, and careful wording provided in Plan Objectives to ensure mitigation measures where they might be required. The inter-relationships between effects, which are inherent and complex in such a Plan as this, are acknowledged and explained where necessary.

4.21 The summary findings of the SA of the draft Partnership Plan are, as follows:

**Table 4.1: Summary SA Findings**

	Landscape, Seascape & Natural	Nature & Biodiversity	Historic Environment & Cultural Heritage	Natural Resources: Land, Soils, Air, Water,	Energy & Climate Change	Economy & Employment	Communities, Health & Equality
<b>A Cared for Landscape &amp; Heritage</b>							
Exmoor's unspoilt natural beauty, tranquillity, openness, wildness and dark night skies are celebrated, looked after, and enjoyed	++	++	0	+	0	0	+
Exmoor's irreplaceable historic environment and cultural heritage is cared for, celebrated and plays a key role in informing our future	+	0	++	0	0	0	+
<b>A Nature-Rich Landscape</b>							
Habitats Exmoor's rich mosaic of wildlife habitats is enhanced, extended, resilient and well-connected, forming a network of nature-rich areas with blurred edges, corridors linking them and stretching across the National Park boundary	++	++	0	0	+	+	+
Wildlife is thriving with a greater abundance of species that can easily move across the landscape and adapt to a changing climate	++	++	0	0	+	+	+
<b>A net zero National Park, mitigating and adapting to climate change</b>							
Exmoor is a net zero National Park, reducing greenhouse gas emissions to a minimum level and locking up carbon in peatlands, trees, soils and plants	+	+	+	+	++	+	+

Exmoor's natural and historic assets, local communities and businesses are adapted and resilient to climate change	+	+	+	+	++	+	+
<b>A welcoming place for all, that people feel connected to, improving their health and well-being</b>							
More people are connected with, inspired by, and care for Exmoor, improving their health and well-being and providing a "Natural Health Service"	0	0	0	0	0	0	++
The footpaths, bridleways and open access land are well maintained and accessible for all to experience and enjoy Exmoor	0	0	0	0	0	+	++
Exmoor is promoted and managed as a regenerative tourism destination, providing a great visitor experience, leaving the environment in a better state, and positively contributing to the well-being of local communities	0	0	0	0	0	++	+
There are more opportunities for young people from all backgrounds to explore and connect and with Exmoor, developing skills and knowledge, and taking an active role in the future of Exmoor	0	0	0	0	0	0	++
<b>Healthy Natural Resources</b>							
Exmoor's soils, air and water resources are healthy and support naturally functioning ecosystems	++	++	0	++	+	+	+
<b>A great place for people to live, work and do business</b>							
Exmoor's communities and economy are sustainable and resilient, supporting the transition to a low carbon economy and lifestyles, and providing new opportunities, skills and employment	0	0	0	0	0	++	++
<b>Bringing it all together – place based delivery</b>							
Exmoor's distinctive <b>moorland and farmed</b> landscapes are evolving and resilient to climate change. Their natural beauty is enhanced and heritage conserved. Habitats are more diverse, in better	++	++	+	+	+	+	+

condition, extended, connected and richer in wildlife. Some areas are wilder and natural processes are restored. Land is managed sustainably to produce high quality food and timber. People can access and enjoy these special places including the tranquillity and dark night skies							
Exmoor's <b>woodlands and tree cover</b> are diverse, well-managed, expanded, better connected, more resilient, and productive. They enhance the natural beauty, wildlife, cultural heritage and enjoyment of the National Park and play a major role in responding to climate change	++	++	+	+	+	+	+
Exmoor's <b>wetlands, rivers, streams</b> and their associated valleys are in good condition and function more naturally. Their native flora and fauna is thriving, and flood risk is reduced. Access is managed sensitively	++	++	+	+	+	+	+
Exmoor's stunning coast has access opportunities for all, where people and nature can thrive, heritage is conserved, and we build resilience to coastal change	++	++	+	+	+	+	+

## Equality Impact Assessment

- 4.22 In order to demonstrate compliance with the Equality Act 2010, a separate screening was carried out and is presented as a technical appendix to this SA Report. The draft ENPPP Aims and Objectives were assessed against each of the protected characteristics. An EqIA demonstrates how the Authority has met with the Public Sector Equality Duty (PSED) as set out under Section 149 of the Equality Act 2010.
- 4.23 The detailed findings of the EqIA are presented in Appendix III of this SA Report. The EqIA screening assessment has found that draft Exmoor National Park Partnership Plan is unlikely to have negative effects on protected characteristics or persons identified under the Equality Act 2010 and as a result a full EqIA will not be required.

## Habitats Regulations Assessment (HRA) & Appropriate Assessment (AA)

- 4.24 The HRA screening identified that due to the strategic nature of the Partnership Plan, and the limited potential environmental pathways for impacts to the European sites outside of the National Park, there were no identified adverse Likely Significant Effects (LSEs) for air quality changes, recreational disturbance, changes to water quality or levels, or habitat loss/fragmentation – alone or in-combination with other plans.
- 4.25 Overall, it is considered that the draft Exmoor National Park Partnership Plan is not likely to have any significant adverse effects on the integrity of the identified European sites – alone or in-combination with other plans or projects. The Plan is an aspirational plan that sets a strategic framework for development of more specific strategies, plans and actions; at this strategic stage there is insufficient information or locational specificity to assess the effects on the European sites. As specific projects or plans are developed, there may be a need to consider further HRA.

## 5.0 MONITORING PROPOSALS

- 5.1 The SEA Directive and Regulations require that the significant effects (positive and negative) of implementing the plan should be monitored in order to identify at an early stage any unforeseen effects and to be able to take appropriate remedial action. Government guidance<sup>31</sup> on SA/SEA advises that existing monitoring arrangements should be used where possible in order to avoid duplication. The ENPA has advised in the Plan that progress towards delivering the targets in the Partnership Plan will be regularly monitored and the outcomes will be monitored through periodic updates to the State of the Park Report<sup>32</sup>. It is considered that no further monitoring is necessary with regard to the SA/SEA.
- 5.2 The EqIA (Appendix III of this SA Report) noted that Devon and Somerset County Councils produce annual reports on equality in the county. Taking this into account with the monitoring undertaken by the ENPA, the EqIA concluded that further monitoring regarding equality and diversity is not considered to be required.

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<sup>31</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

<sup>32</sup> <https://www.exmoor-nationalpark.gov.uk/enpa/key-documents>

## 6.0 CONCLUSIONS, CONSULTATION & NEXT STEPS

- 6.1 The SA, incorporating SEA, has been undertaken according to good practice and in line with Government requirements and guidance. The SA used the SA framework of objectives for sustainability established through the SA scoping process. Together with the baseline information and professional judgment, the draft Vision, Aims and Objectives were tested in a consistent manner and with similar levels of detail. The ENPPP is limited in opportunities for options for different approaches and there were no reasonable alternatives that required testing through the SA process.
- 6.2 Overall, the SA has found that implementation of the Exmoor National Park Partnership Plan will have likely positive effects or neutral (insignificant or not directly applicable) effects; there were no negative effects identified. Mitigation measures are provided through avoidance and recognition of potentially conflicting Plan objectives and considered through plan-making such that any significant negative effects have been mitigated through embedded measures.
- 6.3 The SA found major positive effects for the key intentions to manage landscape, heritage and nature, including progressing naturally functioning systems. Major positive effects are indicated for mitigating and adapting to climate change - which will have further positive effects on all SA Objectives. Major positive effects are indicated for communities and health/wellbeing, particularly through the Aim for a welcoming place for all that considers visitors, workers, residents and their communities.
- 6.4 Major positive effects were found through the SA for the support for the next generation of Exmoor. The findings of the Equality Impact Assessment were integrated into the SA; no negative effects were found for the protected characteristic groups.
- 6.5 A pragmatic and proportionate Habitats Regulations Assessment was undertaken and the findings were integrated into the SA. The HRA screening stage of the process determined that there would be no adverse likely significant effects (LSEs) on the identified European sites – either alone or in combination with other plans and projects, and no further assessment was required at this time.
- 6.6 This SA Report will accompany the draft Exmoor National Park Partnership Plan on consultation during early 2025. Comments received on the SA and the draft Plan will be taken into account in finalising the Partnership Plan prior to adoption later in 2025. The final ENPPP will be accompanied by a SA Adoption Statement in line with the requirements of the SEA Regulations.

## **APPENDICES:**

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- I Statement on Compliance with SEA Directive & Regulations**
  
- II SA Scoping Report (Final, December 2023) available at <https://www.exmoor-nationalpark.gov.uk/enpa/key-documents/partnership-plan-2025-consultation>**  
and including the details of the baseline evidence, the plans/programmes review, and the development of the SA Framework for assessment.
  
- III Equality Impact Assessment (EqIA) Screening Report**



## Appendix I: Statement on Compliance with SEA Directive & Regulations

The EU SEA Directive<sup>33</sup> (Annex 1) requires certain information to be provided in the Environmental Report. This requirement is implemented into UK legislation through the SEA Regulations (2004)<sup>34</sup>. This is Appendix 1 of the Sustainability Appraisal Report that constitutes the Environmental Report as required by the SEA Directive and the UK SEA Regulations. It sets out how the requirements for SEA have been met and signposts where this information is found in the Sustainability Report (December 2024)

SEA Directive & Regulations Requirements	SA Report Section	Summary of Contents
<i>An outline of the contents, main objectives of the plan and relationship with other relevant plans</i>	Section 1 Introduction	Sets out the Vision, Aims & Objectives of the Exmoor National Park Partnership Plan Review
	Section 3 Implications of other Plans & Programmes & Baseline	Summarises the relationship with other plans and references the detailed review provided in the SA Scoping Report (2023)
<i>The relevant aspects of the current state of the environment and the likely evolution thereof without the implementation of the plan</i>	Section 3 Context & Baseline	Summarises the relevant baseline conditions for sustainability (including the state of relevant environmental aspects) in the Exmoor area. The information is set out in more detail in the SA Scoping Report (2023) that also indicates the likely evolution of current conditions and trends where available
<i>The environmental characteristics of the area likely to be affected</i>	Section 3 Context & Baseline	Summarised in Section 3 of SA Report; where relevant and available; this information is detailed in the SA Scoping Report (2023) provided as Appendix II
<i>Any existing environmental problems which are relevant to the plan including, in particular, those relation to any areas of a particular</i>	Section 3 Context & Baseline	Summarises existing sustainability (including environmental problems) for the Exmoor area. This section also summarises information for Natura 2000 sites in line with Habitats Regulations Assessment requirements (HRA Report available separately, December 2024).

<sup>33</sup> <http://ec.europa.eu/environment/eia/sea-legalcontext.htm>

<sup>34</sup> <http://www.parliament.uk/documents/post/postpn223.pdf>

<b>SEA Directive &amp; Regulations Requirements</b>	<b>SA Report Section</b>	<b>Summary of Contents</b>
<i>environmental importance</i>		
<i>The environmental protection objectives relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation</i>	Section 2 SA Methods Section 3 Context & Baseline	Provides the summary of objectives for sustainability in the Exmoor area (including environmental objectives) and the implications of these objectives for the Partnership Plan (refers to details in the SA Scoping Report 2023); explains how the environmental considerations have been taken into account.
<i>The likely significant effects 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,</i>	Section 2 SA Methods Table 2.1	Presents the SA Framework of objectives that shows which of the issues listed by the SEA Regulations are progressed by which SA objectives.
	Section 5 Table 5.1	Summarises the likely significant effects of implementing the Partnership Plan (including environmental effects). Where possible, an indication is given of whether the effect is likely to be cumulative, short, medium and long term

<b>SEA Directive &amp; Regulations Requirements</b>	<b>SA Report Section</b>	<b>Summary of Contents</b>
<i>positive and negative effects</i>		
<i>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan</i>	Section 5 Table 5.1	No potential significant negative effects are predicted and the SA has noted where mitigation measures are embedded within the ENPPP. No further mitigation is necessary.
<i>An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information</i>	Section 2 Paras 2.11-2.13	Explains the context for options in plan-making & reasonable alternatives in SA/SEA; outlines the approach taken & reasons for no meaningful alternative strategic approaches to the Plan being identified.
	Sections 2 & 3 Methods & Context, Baseline	Outlines how the assessment was undertaken – the appraisal methodology and difficulties encountered in compiling information are noted.
<i>A description of the measures envisaged concerning monitoring</i>	Section 6	Provides measures proposed for monitoring the sustainability (and environmental) effects of the implementation of the Partnership Plan.
<i>A non-technical summary of the information provided under the above headings</i>	(available separately)	Provides a non-technical summary.