Sustainability Appraisal Draft Exmoor National Park Local Plan

Including Minerals and Waste Policies

Non Technical Summary

For Exmoor National Park Authority

Clare Reid Consultancy
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Appendix 1 Sustainability Appraisal Framework

1. INTRODUCTION

1.1. What is a Sustainability Appraisal?

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

1.2. What is the Local Plan?

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

1.3. Why is a Sustainability Appraisal needed?

1.3.1. All plans, programmes and strategies with an impact on the environment are required by European Directive 2001/42/EC, to undergo a Strategic Environment Assessment. The purpose of SEA is to assess where the Plan may have negative environmental effects, and to consider alternatives to avoid or reduce these.

- 1.3.2. The SEA process has been integrated with sustainability appraisal (SA) to achieve a more wide-ranging assessment of sustainability incorporating environmental, social and economic objectives. The SEA criteria have also been developed to include the requirements of Health Impact Assessment (HIA) and Equality Impact and Needs Assessment (EINA) (as required by the Equality Act 2010). A separate assessment has been carried out in accordance with the European Habitats Directive.
- 1.3.3. The assessment plays an important role in producing the Local Plan, by informing decision making. The draft Sustainability Report will be consulted on along with the draft Local Plan.

 A final Sustainability Report will be produced along with the adopted Local Plan.

2. METHODOLOGY

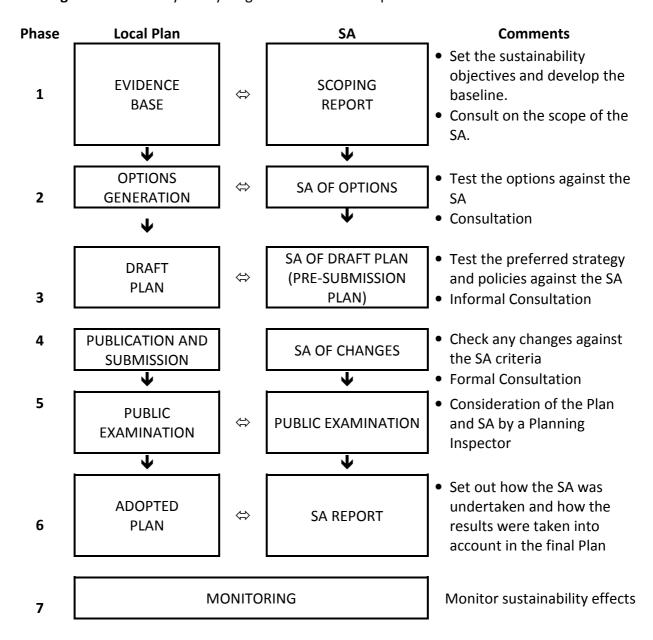
2.1. How was the Sustainability Appraisal carried out?

- 2.1.1. The Sustainability Appraisal has been carried out as an integral part of developing the Local Plan with the aim of promoting sustainable development through the integration of social, environmental and economic considerations. It has been undertaken by an external consultant in consultation with ENPA staff. It is required by government through legislation and is subject to the same level of public consultation and scrutiny as the Local Plan.
- 2.1.2. There are a number of stages required for the appraisal:
 - Phase 1 deciding the scope of the appraisal (2010) A Scoping Report was produced, setting out what the SA should cover, providing a baseline of the environmental, social, and economic characteristics of Exmoor, reviewing a wide range of policy documents, monitoring and evidence, and identifying the key sustainability issues affecting Exmoor. A SA framework was developed, with a set of sustainability objectives and criteria to guide the preparation of the draft Plan. The Scoping Report was subject to public consultation.
 - Phase 2 considering broad options and alternatives (2011/12) In preparing the draft Local Plan, a broad range of options and alternatives were considered. This included options for where development could go, alternatives for how affordable housing could be delivered, and the policy approaches that would help deliver sustainable development on Exmoor. The options were subject to SA and public consultation.
 - Phase 3 assessing the draft Plan & consulting on the draft Plan and Sustainability Report (2013) the stage we are at now
 Following consultation on the options, the preferred strategy and policies were developed to form the draft Local Plan. Each of the policies have been assessed to consider the environmental, social and economic effects, and recommendations made to avoid or mitigate any potential adverse impacts. The draft Plan and Sustainability Report will be subject to informal public consultation during the autumn of 2013.
 - Phase 4 Publication of the Plan and Sustainability Report, and submission to Government The results of the draft Local Plan consultation will be taken into account and the Plan will be amended in the light of this. The National Park Authority will then publish the Plan and formally consult on it along with the Sustainability Report. The Plan will then be submitted for examination.
 - Phase 5 Public Examination
 The Local Plan and consultation responses will be considered by a Planning Inspector and a public examination held. The Inspector may make recommendations for amendments

to the Plan some of which are binding and others will be subject to the discretion of the National Park Authority.

- Phase 5 Adoption of the Local Plan
 The final changes will be made to the Local Plan before it is formally adopted by National Park Authority. A final Sustainability Appraisal Report will be produced.
- Phase 6 Monitoring implementation of the adopted Plan.
 Once adopted, the effects of implementing the Local Plan will be monitored to ensure that no significant negative or unforeseen effects on the sustainability objectives occur, or to enable these to be addressed if they do arise.

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



2.2. The Sustainability Appraisal Framework

- 2.2.1. The SA framework was developed during Phase 1 to provide a set of sustainability objectives and criteria to use when considering whether each draft policy and option would have positive or negative effects. This includes considering impacts on:
 - Air & water quality
 - Biodiversity & green infrastructure
 - Climate change adaptation & flood risk
 - Climate change mitigation & energy
 - Community & wellbeing
 - Economy & employment
 - Historic environment
 - Housing
 - Land
 - Landscape
 - Coast
 - Transport

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

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

Table 1 – SA scoring system

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

3. SUSTAINABILITY APPRAISAL

3.1. What are the main sustainability issues affecting Exmoor?

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

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

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

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

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

Table 2 – Summary of key sustainability effects

+ Likely positive effects

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

+/- Uncertain or mixed effects

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

Likely negative effects

 Limitations on the overall provision of housing due to constraints such as topography, landscape sensitivity, environmental designations and flood risk

- Restrictions on large scale development due to the National Park designation will limit some
 economic development and jobs, although this will help to protect the natural beauty, wildlife
 and cultural heritage which are important to the local economy as they attract people to visit
 and enjoy the National Park
- Impacts on traffic and parking as there is no provision for peak parking demand although temporary solutions will be sought locally
- 3.3. Summary of the assessment of the draft Plan against the SA topics
- 3.3.1. An overall assessment of the draft Plan against each SA topic is given below. A full explanation of the assessment is given in the main SA Report.
- 3.3.2. Air Quality and Water Resources. Overall the impacts of the draft Local Plan on air quality and water resources are either positive or neutral. There are two policies which could have negative impacts, but recommendations have been made to mitigate against these (see Table 3 below). Air and water quality on Exmoor are generally good, and the levels of development are not likely to be of a sufficient scale to negatively impact on this, although in some popular tourism destinations there are potential issues for air quality arising from pollution from traffic and congestion during the peak holiday periods. Safeguards are in place through policies such as CC-S5 Pollution and AC-S1 Sustainable Transport. There are also safeguards to prevent water pollution for example in relation to agricultural slurry and wastes, and enhancements such as the remediation of contaminated land and other measures to improve the quality of the environment.
- 3.3.3. **Biodiversity and Green Infrastructure.** Exmoor has a wealth of wildlife, with nearly a third of the National Park protected under international or national designations for its wildlife value. The draft Local Plan is generally very positive for biodiversity, geodiversity and green infrastructure, particularly the General Policies which apply to all development. There are also specific policies that protect wildlife and habitats, and encourage enhancements such as the provision of habitats and wildlife friendly measures in developments including bat or bird boxes (CE-S2 Biodiversity. The provision of green infrastructure such as natural habitats, amenity green spaces and wildlife corridors is also encouraged (CE-S3 Green Infrastructure, CE-D2 Green Infrastructure Provision). There is one policy which may have negative impacts but recommendations have been made to mitigate against these (see table 3 below). The spatial strategy includes some settlements where there are wildlife protected areas, and development could be constrained in these areas as a result. *Note a separate Habitats Regulation Assessment has been undertaken to consider the implications of the draft Plan for internationally important habitats*.
- 3.3.4. Climate change adaptation and flood risk. Overall the draft Plan is either positive or neutral in relation to climate change and flood risk. There are two policies which could have negative impacts, but recommendations have been made to mitigate against these (see Table 3 below). There are specific policies which encourage proposals to adapt to the consequences of climate change, including avoiding areas at risk of flooding, and promoting land management to reduce the risk of flooding (CC-S1 Climate Change, CC-D1

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

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

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

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

strategy (GP4), with the local services centres identified as the most suitable places for development to consolidate employment, housing and services. Some of the villages identified also function collectively by sharing their facilities, and a number are served by public transport. The smaller rural communities identified may have opportunities for limited development to sustain the local community over the long term. Overall levels of development in the National Park are likely to be limited, and so the cumulative impacts on transport are not considered to be significant. The only caveat could be in relation to tourism and recreation development if a new attraction draws in significant numbers of visitors, or more intensive use of existing facilities causes increased traffic, but this would need to be carefully assessed through a Travel Assessment or Statement, and if necessary a Travel Plan. There are two policies which could have negative impacts, but recommendations have been made to mitigate against this (see Table 3 below).

3.4. Mitigation measures

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

Table 3 – Policies with potential negative impacts and mitigation measures

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

CE-S4 Cultural Heritage and Historic Environment CE-D3	Transport	The historic nature of many of Exmoor's settlements and buildings restricts opportunities for transport improvements, measures to ease traffic congestion, new car parks and so	where these conflict, giving greater weight to conservation of biodiversity None proposed. The conservation and enhancement of the historic environment would be given great
Ce-D3 Conserving Heritage Assets		on	weight in consideration of any transport proposals
CE-S8 Major Mineral Extraction	Air quality and water resources Biodiversity and Green infrastructure	The policy sets out that it is not considered appropriate or necessary to allow major mineral extraction within the National Park. However, if in exceptional circumstances this is allowed, safeguards are required to ensure that operations do not cause adverse impacts	Amend policy to require safeguards to human health and the natural environment during operation of the site if, in exceptional circumstances, permission is granted for major mineral extraction
CC-D6 Sewerage Capacity and Sewage Disposal	Housing	The policy could potentially result in proposals for affordable housing being refused due to proposals only being permitted where the existing sewerage infrastructure has the capacity, or measures will be put in place, to cope with additional demands.	Amend the policy to avoid affordable housing (which is otherwise acceptable) being refused due to sewerage constraints. Alternative measures such as the provision of septic tanks, could be considered in order enable the affordable housing to be permitted
HC-D3 Specialist Housing HC-D8 Extended Family Dwellings	Cultural Heritage and Historic Environment	The conversion of existing older or traditional buildings for specialist housing could result in damaging alterations which affect the character and fabric of the building for example widening doorways and other measures to enable easier access.	Cross-refer to CE-S4 Cultural Heritage which affords appropriate protection to buildings of historic, architectural interest.
	Climate Change	Specialist housing proposals would need to take particular account of flood risk and climate change	Refer to CC-S1 Climate Change, CC-D1 Flood Risk to ensure

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HC-S6 Travelling communities	Adaptation and Flood Risk Air quality and water resources Climate	adaptation requirements (for example in relation to heating and cooling) given the potentially higher risk if vulnerable people such as the elderly or disabled were occupants The policy covers provision of sites for travelling communities. Whilst there is currently no identified need for sites on Exmoor, If circumstances arise where a site is required to address a proven	proposals take account of flood risk and climate change adaptation requirements Add reference in supporting text to include provision of suitable water (CC-D3 Water Conservation)
	Change Adaptation and Flood Risk	local need, then this would need to include provision of suitable water and sewerage infrastructure to ensure there are no adverse impacts on water resources or air quality. There would also need to be an assessment of flood risk given the vulnerability of the use as caravan or mobile home sites intended for permanent occupation are regarded to be at higher risk (classified as 'highly vulnerable' in national guidance).	and sewerage infrastructure (CC-D6 Sewerage Capacity and Sewage Disposal) to ensure there are no adverse impacts on water resources or air quality. Add reference in the text to consideration of flood risk, Policy CC-D1.
HC-D19 Important Visual Amenity Space	Housing	The protection of visual amenity space could prevent housing development particularly given the constrained nature of many of Exmoor's settlements	None proposed. The policy approach is addressing other sustainability objectives particularly the protection of amenity spaces that are important for community wellbeing, landscape and wildlife
AC-S3 Traffic Management and Parking AC-D2 Parking Provision and Standards	Economy and Employment	Exmoor is disadvantaged economically as it has no strategic road or rail corridors, which can hinder wider economic opportunities (although this can benefit tourism as people visit to enjoy the peace and tranquillity). Traffic and congestion including demand for parking during peak holiday periods can be bad for business. However, the policy approach is to prioritise community needs over business or tourism. The principle is to provide the minimum parking required taking into account environmental constraints, although bicycle,	None proposed. The policy approach is addressing other sustainability objectives and alternative solutions will be encouraged on a case by case basis to address localised problems such as parking demand during peak holiday periods along with alternative, more sustainable means of travel

	motorcycle and disabled parking	
	provision are all encouraged	

3.5. Cumulative effects

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

3.6. What alternatives were considered to the draft Local Plan?

3.6.1. The SEA Directive requires assessment of the likely significant effects of implementing the plan, and "reasonable alternatives". Developing options / alternatives is an important part of both the plan-making and sustainability appraisal process. For the Local Plan, different options were put forward during the preparation of the plan. This included options for how affordable housing could be delivered, and options for where new development should go. These options were appraised and subject to consultation.

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

4. MONITORING

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

5. NEXT STEPS AND CONSULTATION

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

Appendix 1 - Sustainability Objectives, Criteria and Indicators

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

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

Topic	Objectives	Criteria – will the proposals in the Plan	Indicators
Air Quality and Water Resources	To minimise air pollution (including green house gas emissions) and water pollution and ensure air and water quality is maintained or improved. Explanation: This objective seeks to minimise pollution from development.	 Maintain or improve air and water quality? Minimise emissions from residential and commercial sources? Reduce emissions from transportation sources? 	 Air quality Monitoring data – Environmental Health (WSC & NDC) Domestic per capita CO2 (tonnes). % of river length reaching grade A/B (Very good/good) quality for chemical and biological assessment.
Biodiversity and Green Infrastructure	2. To conserve and enhance biodiversity and to protect, conserve and enhance all habitats and species. Explanation: These objectives seek to conserve and enhance Exmoor's biodiversity, habitats and species so that any negative impacts from development are avoided or mitigated when meeting the needs of communities and visitors.	 Conserve and enhance the diversity of species? Conserve and enhance the diversity of habitats? Make provision for protected and important species and habitats where appropriate? Have no adverse impact on SACs or SSSIs? Enhance local biodiversity and the natural environment? 	 Area of new BAP habitat created or restored. Number of SACs and SSSIs in favourable or unfavourable recovering condition. Proportion of Local Wildlife Sites where positive conservation management has been or is being implemented (NI197). Number of applications with provision for protected/important species. Number of applications with provision for protected/important habitats. Number of applications where a wildlife survey has been submitted.

Topic	Objectives	Criteria – will the proposals in the Plan	Indicators
Climate Change and Adaptation to Flood Risk	3. To minimise and manage the risk of all forms of flooding. 4. To minimise the impacts of climate change on Exmoor's communities and habitats. Explanation: These objectives seeks to manage and minimise the impacts of climate change and flood risk and help communities and habitats to adapt as appropriate.	 Put properties at risk of flooding? Provide development in the flood plain? Provide development in areas vulnerable to coastal change? Put communities and habitats vulnerable to the effects of climate change at risk? 	 Number of planning permissions granted contrary to Environment Agency advice on flood defence grounds. Number of permissions which make a positive contribution to sustainable flood management. (include SUDS proposals) Number of planning permissions in areas vulnerable to coastal change. Number of planning permissions for structures and measures to adapt to the impacts of climate change e.g. coastal defences.
Climate Change Mitigation and Energy	5. To minimise the net emissions of carbon dioxide and other greenhouse gases into the atmosphere and to minimise Exmoor's contribution to global climate change. Explanation: This objective seeks to minimise greenhouse gas emissions, promote sustainable living, implement sustainable building practices and install renewable technology that is appropriate to the National Park's statutory purposes to conserve and enhance the natural beauty, wildlife and cultural heritage of the area and to promote opportunities for the understanding and enjoyment of its special qualities by the public, whilst aiming to achieve	 Ensure development incorporates energy sustainability measures? Maximise Exmoor's potential for renewable energy generation? Improve the sustainability of Exmoor's communities? Encourage the use of sustainable building design and methods? Encourage travel by sustainable means of transport? 	 Domestic per capita CO2 (tonnes) – measure every 5 years. Number of planning permissions for renewable technologies and other energy sustainability measures. Housing development that incorporates energy and sustainability measures (above building regulation requirements).

Topic	Objectives	Criteria – will the proposals in the Plan	Indicators
	the target of becoming a carbon neutral National Park by 2025.		
Community and Wellbeing (including equalities and health)	6. To promote and support thriving and inclusive communities, health and wellbeing. Explanation: this objective focuses on securing balanced, inclusive communities where people can live healthy lives, have equality of access to community, education and health services and facilities, and have access to and enjoy cultural and recreational opportunities.	 Provide for community services? Encourage healthy lifestyles? Improve access to the Park and to its opportunities and facilities for all? Create new access opportunities where appropriate? Help to implement the installation of infrastructure for broadband and mobile technology that is sympathetic to the National Park setting? Affect specific sub groups disproportionately compared with the whole population? Cause changes in contacts with health and/or care services, quality of life, disability or death rates? Likely to cause public or community concerns about potential health impacts of this policy change? Create safe and attractive public spaces? Promote local multi service centres? Improve opportunities for community participation? Improve access to recreational space, leisure activities, learning and cultural opportunities? 	 Amount of open access land available under the CROW Act 2000. Index of multiple deprivation and measures of health deprivation. Number of cultural, leisure and sporting facilities available. Number of village shops and village post offices available. Creation and loss of community services and facilities. Number of planning permissions providing disabled access.
Economy and Employment	7. To promote and support appropriate, sustainable economic growth, particularly of the key business sectors of tourism, agriculture and other land based industries and small businesses. Explanation: This objective seeks to support and enhance the key sectors of the Exmoor economy and at the same time support the growth of small businesses.	 Promote and support a sustainable tourism sector? Promote and support a sustainable agricultural sector and other land based industries? Promote and support small businesses? Encourage use of local products and services? Help to implement the installation of infrastructure for broadband and mobile technology that is sympathetic to the National Park setting? Work with local employers to support/promote flexible / home working and ICT innovations? Support local businesses and suppliers? 	 Number of registered farm holdings. % occupancy of beds in holiday accommodation throughout the year. Tourist spending. Occupancy rates for serviced and non-serviced accommodation. % of tourism businesses participating in green/sustainable initiatives or schemes. Number of applications permitted to create serviced/non-serviced accommodation. Loss of serviced/non-serviced accommodation.

Topic	Objectives	Criteria – will the proposals in the Plan	Indicators
	Economic development will be appropriate to the National Park setting and where possible will benefit from and help to promote the National Park's special qualities.		 Number of applications permitted for: camp sites, camping barns, certificated caravan sites. Number of applications/floorspace (or monitor completed development) for business development (B1, B2 & B8). Could also include separate indicators for A class uses and C1. Number of planning applications for change of use from business to other use. Number of live/work/home-working spaces permitted. Number and area of agricultural buildings permitted. Number and proportion of agricultural buildings refused. Number of farm diversification proposals permitted for: Conversion of traditional farm building Conversion of modern farm building New building Number of applications permitted for development for game-bird shooting. Number of applications approved for equestrian development.
Historic Environment	8. To maintain and enhance the quality of the built environment. Explanation: This objective seeks to maintain and enhance the built and historic environment of Exmoor through allowing sympathetic and sustainable design and alteration of new and existing buildings.	 Conserve the character of historic landscapes? Conserve the character of settlements and buildings? Protect and enhance ancient monuments and other heritage assets? Recognise the potential of the historic environment to contribute to social and economic progress. Improve access and understanding of local heritage. Promote a standard of quality in new building design? Encourage use of local and traditional and sustainable buildings products and materials? Enhance the distinctiveness and diversity of the local 	 Use of local and/or traditional buildings materials in new developments or conversions and extensions. Number of conservation area enhancement projects. Number of archaeological projects (i.e. restoration). Number of listed buildings: on the at risk register; subject to unauthorised alterations; subject to demolition; and successful enforcement action. Number of listed building consents refused.

Topic	Objectives	Criteria – will the proposals in the Plan	Indicators
		built environment and community spaces?	
Housing	9. To help ensure that National Park communities have access to appropriate, good quality, sustainable, affordable housing. Explanation: This objective seeks to provide housing to maintain balanced living and working communities and in doing so provide a sustainable mix of affordability, size and type of housing that is of good design and sustainable materials and provides for the needs of young and older people and those whose work is important to communities.	 Provide affordable housing? Provide for the housing needs of older people? Provides for the housing needs of young people? Provides for those whose work is important to the conservation of the National Park and viability of communities? Provides for the needs of agricultural and forestry workers? Ensures affordable housing remains affordable in perpetuity? Housing development makes good use of existing land and buildings? Conserves and enhances the special qualities of the National Park? Helps development to incorporate energy and sustainability measures? Provides a better mix of sizes, types and affordability. 	 The proportion, tenure and type of affordable dwellings approved and constructed. Who is the affordable housing for? i.e. a worker, a local connection etc Mean and median average house prices. Average house price to average household income ratio. Average annual increase in house price. Number of planning permissions for annexe accommodation. Number of agricultural and forestry dwellings permitted. Housing development from existing land or buildings (brownfield land). Housing development that incorporates energy and sustainability measures (above building regulation requirements). Number of empty and second homes. Number of households in housing need.
Land (including agricultural, brownfield, contaminated land, waste and minerals)	 10.To promote sustainable forms of development and sustainable use of natural resources. Explanation: This objective seeks to concentrate and diversify development by optimising the use of previously developed land, infrastructure, under used land and vacant properties. 11.To reduce all forms of waste 	 Promote sustainable mineral extraction? Promote the reuse of land and buildings? Protect the best and most versatile land from development? Contribute to the reduction, reuse and recycling of waste? Contribute to appropriate waste treatment and disposal? Minimise the risk of contaminated? Reduce soil quantity and quality? 	 Number of planning permissions built on previously developed land. Loss of the best and most versatile agricultural land to development (need a GIS layer available on PACS). Loss of greenfield land to development. Percentage of waste generated, recycled, composted and sent to landfill. Number of planning permissions for redevelopment of contaminated sites. Number and type of mineral applications permitted.

Topic	Objectives	Criteria – will the proposals in the Plan	Indicators
	production and promote reuse and recycling and minimise the risk of contaminated land. Explanation: Although the National Park is not the waste authority, it		
	will seek to implement policies to reduce the amount of waste generated and to promote sustainable waste management.		
Landscape	12.To protect, maintain and enhance the special qualities of the Exmoor National Park's landscape character. Explanation This objective aims to ensure that Exmoor retains its wild, remote and tranquil setting to enable the quiet enjoyment of the National Park.	 Reduce or mitigate the adverse effects of agricultural change on the landscape? Ensure development is sited and designed with landscape in mind? Reduce the impact of large structures and development that can be seen from the National Park? Reduce the impact of recreational activities on the landscape? Contribute to the wild, remote and tranquil setting of Exmoor? 	 Number of planning permissions (outside the National Park boundary) that enable large structures and development to be visible from the National Park boundary. Agri-environment scheme uptakes. Percentage change in farming businesses. Loss or damage to key landscape features (woodlands, walls, hedges and hedgebanks) Change in Countryside Quality based on Countryside Quality Counts data used to inform condition of Countryside Character Areas. Number of lighting conditions attached to planning permissions.
Coast	13. To protect and/or enhance coastal areas. Explanation This objective aims to protect and/or enhance coastal areas and minimise the effects of coastal change on communities, the cultural heritage and habitats at risk	 Put coastal communities and habitats at risk of the effects of coastal change? Minimise the impact of sea level rises? Direct development away from vulnerable coastal areas? Consider the implications sea level rise may have on historic and cultural assets? 	 Number of planning permissions in areas vulnerable to coastal change Number of planning permissions for coastal structures and measures to adapt to the impacts of climate change e.g. coastal defences. Number of planning permissions for temporary business development in areas vulnerable to coastal change.

Topic	Objectives	Criteria – will the proposals in the Plan	Indicators
	from the effects of climate change. In some circumstances the coast cannot be feasibly protected in the long term and adaptation measures which enhance the coastal area will be necessary.		
Transport	14. Encourage travel by sustainable means of transport and provide access to services, whilst recognising the need to travel by private modes of transport in a dispersed rural area such as Exmoor. Explanation: This objective, although aspirational in seeking to reduce travel by means of the private car, recognises that Exmoor is a dispersed rural area where currently there is a need	 Help to ease traffic congestion in the tourism season and provide more sustainable ways of accessing the National Park? Safeguard public rights of way? Improve opportunities for safe horse-riding, cycling and walking as an alternative to car travel? Reduce the need to travel, especially by private car? Improve access to online and mobile services to reduce travel by car? Support demand responsive, low-carbon public transport for the local community? Support improved (and low carbon) access to essential goods and services? 	 Average daily traffic movements. Public transport routes. Percentage of public rights of way 'easy to use' (BVPI 178). Length of public right of way adversely affected by development.
	to travel by private modes of transport in order to access services and facilities.		