

**Sustainability Appraisal Report
Exmoor National Park
Draft Local Plan**

Including Minerals and Waste Policies

For Exmoor National Park Authority

**Clare Reid Consultancy
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1. Introduction

1.1. The Sustainability Appraisal Report

- 1.1.1. Exmoor National Park Authority (ENPA) is preparing its Local Plan¹ which will guide development in the National Park to 2030. The Local Plan is a planning document that sets out the overall vision and objectives for the National Park and provides a spatial strategy and policies that will guide how these will be achieved. The overall aim of the Local Plan is to ensure that any new development will help to achieve the National Park purposes and deliver sustainable development. The Local Plan includes both strategic policies and development management policies. It has to be set within national planning policy, as set out in the National Planning Policy Framework (NPPF). The NPPF states that the purpose of planning is to help achieve sustainable development, with three integrated elements – an economic role, a social role and an environmental role.
- 1.1.2. The National Park Authority is required to test the emerging Local Plan against a set of sustainability objectives, to consider the implications of the proposed policies and strategy against social, economic and environmental criteria. This sustainability appraisal (SA) fulfils the requirements of Government policy including requirements for Equality Impact Assessment (EqIA) and Health Impact Assessment (HIA), and European legislation in the Strategic Environmental Assessment (SEA) Directive. A separate Appropriate Assessment required under the Habitats Regulations has also been undertaken.
- 1.1.3. The process of SA and SEA aims to promote sustainable development through better integration of sustainability considerations in the preparation and adoption of plans. The SA has therefore been undertaken as an integral part of the preparation of the draft Local Plan, and has influenced the draft policies and strategy.

1.2. National Park statutory purposes and duty

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

¹ Previously referred to as the Local Development Framework

and promoting public understanding and enjoyment of these should lie at the very heart of developing a strong economy and sustaining thriving local communities².

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

² UK Government Vision and Circular English National Parks and the Broads, Defra, 2010

2. Methodology

2.1. Approach

2.1.1. The Sustainability Appraisal has been carried out by an external consultant in consultation with ENPA staff and members. 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 Report³ 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 SA⁴ 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 has 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

³ Sustainability Appraisal Scoping Report, Exmoor National Park Authority (2010)

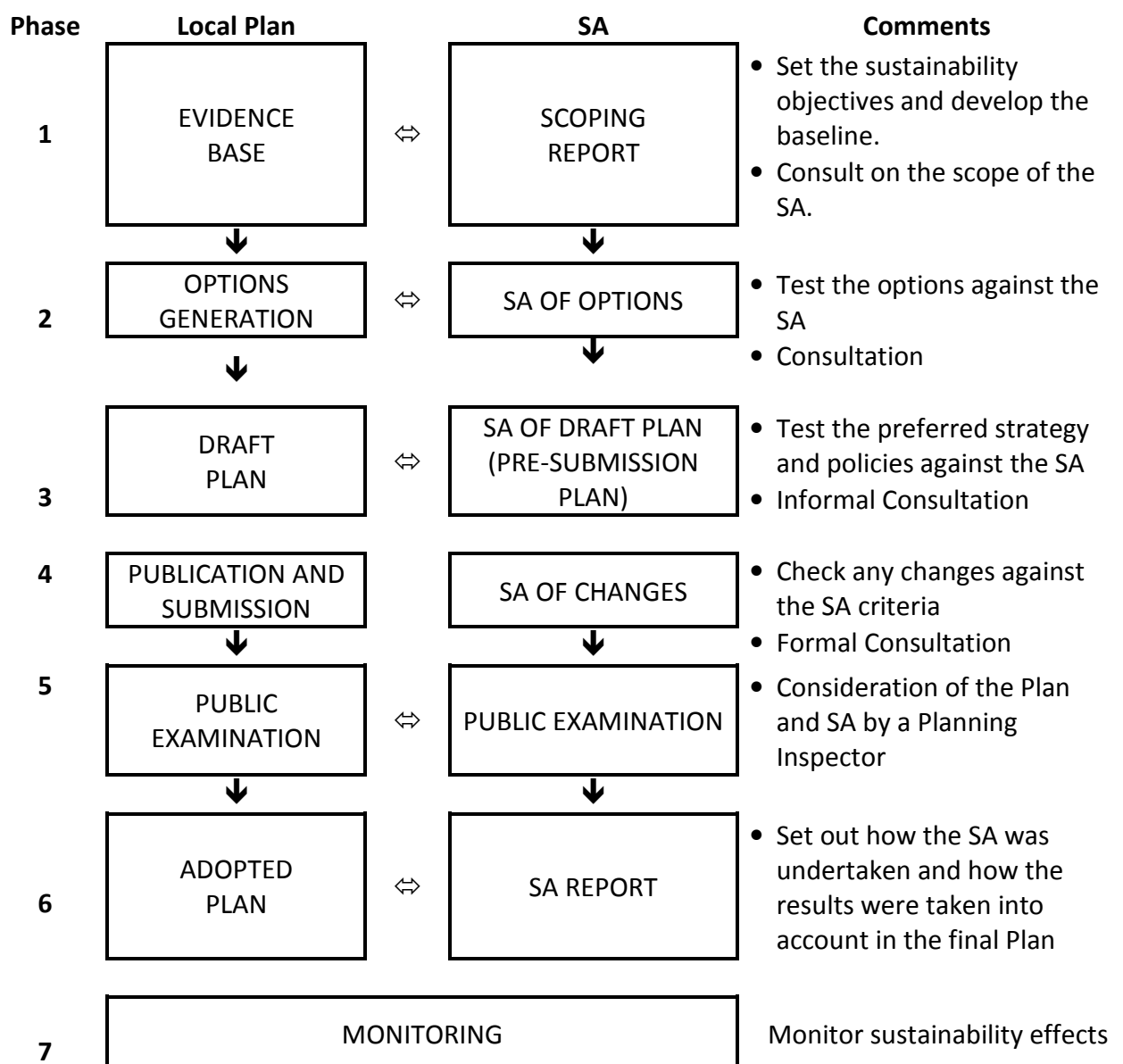
⁴ Sustainability Appraisal for the Local Plan Vision, Objectives, General Policies and Strategic Options, Clare Reid Consultancy (2011)

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 Scoping Report provides a framework for undertaking the SA as the draft Local Plan is prepared. The Scoping report provides:
- A baseline characterisation of the National Park setting out the social, environmental and economic issues that face the area.
 - An assessment of the situation likely to arise without the Plan.
 - A summary of relevant policies, plans, programmes and objectives which inform the Local Plan.
 - Sustainability objectives for a combined SEA / SA appraisal framework which forms the basis for appraisal of the Local Plan as it is prepared.
 - Appropriate monitoring indicators that meet the requirements of SA / SEA.
- 2.2.2. The Scoping report sets out a series of topics to provide a framework for producing the SA:
- Air & water quality
 - Biodiversity & green infrastructure
 - Climate change adaptation & flood risk
 - Climate change mitigation & energy
 - Community & wellbeing
 - Economy & employment
 - Historic environment
 - Housing
 - Land
 - Landscape
 - Coast
 - Transport
- 2.2.3. For each topic, a set of sustainability objectives and criteria were identified to test the draft Plan against, and indicators for monitoring the effect of implementing the Plan. The full SA framework is set out in **Appendix 1**. The SA framework covers the topics listed in Annex 1 of the SEA Directive - biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, and landscape. A table setting out how the SA meets the requirements of the SEA Directive is given in **Appendix 2**.
- 2.2.4. Each policy was assessed against the 12 topics in the SA framework, using the criteria and objectives listed in Appendix 1, and given an overall score. The scoring system is set out in **Table 1** below.

Table 1 – SA scoring system

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

2.3. Consultation

- 2.3.1. The results of the SA have been subject to public consultation throughout the process of developing the Plan. The three statutory bodies (Environment Agency, Natural England and English Heritage) are also consulted. This Sustainability Appraisal Report will be consulted on with the draft Local Plan. The consultation documents are available on the website at www.exmoor-nationalpark.gov.uk and at publicised locations.

3. Sustainability Baseline and Key Issues

- 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 and horse-riding are well served by the public rights of way and open access network.
- Responding to climate change. National Parks are expected to lead the way in demonstrating how society can adapt to changes in climate such as extreme weather events and flood risk. This brings opportunities but also challenges, particularly as a number of settlements are at risk from flooding from rivers or the sea, and traditional buildings can be difficult to adapt without damage to their historic fabric or character. The National Park also needs to build resilience in terms of how wildlife, landscape and the historic environment can adapt to climate change.
- Helping to mitigate future climate change. Exmoor is already in the forefront of measures to reduce damaging greenhouse gas emissions, including through carbon storage in peat and woodlands. Again there are opportunities, for example encouraging the use of sustainable building methods and design, but there are also challenges such as accommodating renewable energy technologies without damaging the landscape or historic character of buildings and settlements, and encouraging sustainable modes of transport.
- Maintaining the quality of Exmoor's natural resources such as air quality and water resources. Whilst air and water quality on Exmoor are generally good, it is important that development does not affect this either through individual proposals, or the cumulative effect of a number of developments over time. The implications are not just local, as Exmoor is also an important source of water for large numbers of households in Somerset and Devon.

3.1.3. A full assessment of the sustainability baseline and key issues is given in the SEA Scoping Report⁵.

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

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

- 4.1.1. 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.
- 4.1.2. 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. The full assessment is detailed in the following chapters.

Table 2 – Summary of key sustainability effects

+ Likely positive effects
<ul style="list-style-type: none"> • 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
<ul style="list-style-type: none"> • The relatively limited capacity of greenfield land for affordable housing could be used up at a faster rate due to cross-subsidy from market housing in certain circumstances • Uncertain 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 market housing • The Plan does not allocate employment sites as evidence does not suggest need for this, with

uncertain effects on jobs and businesses, although a flexible approach to support appropriate business development is encouraged

- Renewable energy is positive for climate change mitigation and local communities but its scope may be limited in the National Park to avoid impacts on landscape and historic environment

- **Likely negative effects**

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

5. Exmoor Local Plan Vision, Strategic Priorities and Objectives

5.1. Links to the Exmoor National Park Management Plan

- 5.1.1. National Park Authorities are required to produce a Management Plan and keep it updated every five years. This is a strategic Plan for the National Park as a whole, not just for the National Park Authority, and in recognition of the importance of working together with a wide range of partners to deliver the Plan, it was updated in 2012 as the Exmoor National Park Partnership Plan. As the Partnership Plan and Local Plan are two important strategic documents for the National Park, it was decided that a joint Vision and Objectives should be developed, which set out what Exmoor should look like in 2030.
- 5.1.2. The joint Vision and Objectives were developed and consulted on during November 2011 to January 2012, alongside the strategic options for the Local Plan, and accompanied by the sustainability appraisal report⁶. A separate SA was carried out of the Exmoor National Park Partnership Plan 2012-17, using the same SA framework for consistency⁷. The SA of Alternative Options is summarised in Chapter 14 Overall Assessment of Local Plan against SA Topics, Cumulative Effects and Alternative Options.
- 5.1.3. The SA of the joint Vision and Objectives included a number of recommendations, as set out below.

Recommendations	Changes
The Vision statement and Objectives could be strengthened by reference to <i>'expanding and connecting'</i> habitats and <i>'creating networks of multi-functional green infrastructure'</i>	The Vision and Objectives both have references to expanding the extent of habitats and increasing connections between them. There are no specific references to green infrastructure as the Vision and Objectives were considered to sufficiently cover networks and linkages. Reference to green infrastructure was added to policy GP1 (see below)
The Vision could be strengthened by specific reference to affordable housing and transport	The Vision includes <i>'access to services, housing, communications and infrastructure'</i> . Specific references to affordable housing are made in the longer vision statement, and the Objectives. Sustainable transport is one of the Objectives.

⁶ Sustainability Appraisal Report – Local Plan Vision, Objectives, General Policies and Options, (2011) prepared by Clare Reid Consultancy for Exmoor National Park Authority

⁷ Sustainability Appraisal Report – Exmoor National Park Partnership Plan, (2012) prepared by Clare Reid Consultancy for Exmoor National Park Authority

<p>The Objectives could be strengthened by reference to protecting the special qualities of the National Park from mineral extraction and supporting the supply of local building materials through small scale stone quarries</p>	<p>This is implicit in Objective 6 '<i>to use local materials, sustainable building design and methods</i>'</p>
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6. Spatial Portrait

- 6.1. This section of the Local Plan provides an overview of the National Park and will articulate the issues the National Park faces with a description of the main characteristics of the area in terms of location, settlements, natural and built environment, housing, economy, communities and accessibility. There are no policies to assess as part of the SA.

7. Appraisal of Draft Local Plan Policies – Chapter 4 General Policies (including Vision and Objectives)

7.1. Overview

7.1.1. This Chapter covers the following Policies:

- **General Policy 1 National Park Purposes and Sustainable Development**
- **General Policy 2 Model Policy (*not appraised*)**
- **General Policy 3 Major Development**
- **General Policy 4 Spatial Strategy**
- **General Policy 5 Securing Planning Benefits**
- **General Policy 6 Enhancing the National Park**

7.1.2. General Policies 1 and 3 were developed at an early stage and were appraised and consulted on alongside the Vision, Objectives and Alternative Options. For ease of reference, the appraisal for all the policies is included here.

7.1.3. General Policy 2 is the Model Policy provided by the Planning Inspectorate which all Local Plans have to include, to demonstrate how the Plan meets the NPPF presumption in favour of sustainable development. As such it is not considered necessary to appraise the Model Policy.

7.1.4. A summary of the scores for these Policies is given in **Table 3** (please refer to the key for the scoring system at Table 1, page 8). The table shows how the scores have changed as a result of changes made to the draft Local Plan in the light of the SA recommendations. In these cases, the cell has been split in half, with the bottom half showing the original score, and the top half showing the score following changes made as a result of the SA recommendations.

Table 3 – Summary scores for Draft Policies Chapter 4: General Policies

SA topics	GP1	GP3	GP4	GP5	GP6
Air quality and water resources	++	+	+/-	0	+
					0
Biodiversity and Green Infrastructure	++	++	+/-	0	++
Climate change & adaptation to flood risk	++	++	+	0	0
			+/-		
Climate change mitigation and energy	+	+	+/-	0	+

SA topics	GP1	GP3	GP4	GP5	GP6
Community wellbeing	++	+	++	+	+
Economy and employment	++	+/-	++	+	+
Historic environment	++	++	+	0	++
			+/-		
Housing	++	+/-	++	+	0
Land	++	++	+	0	+
					0
Landscape	++	++	+	0	++
Coast	+	+	+	0	0
Transport	+	+	+/-	0	0

Split cells indicate where scores have changed as a result of the SA, the bottom cell shows the original score, and the top cell shows the score following the SA

7.2. **Overall Assessment of Draft Policies Chapter 4 General Policies**

- 7.2.1. There are a number of positive and strongly positive implications from the General Policies, particularly GP1 National Park Purposes and Sustainable Development, and GP6 Enhancing the National Park. These policies set out the principles for conserving and enhancing the National Park, and GP1 covers the full range of social, economic and environmental objectives.
- 7.2.2. Given the National Park's designation, it is not considered appropriate for major development to take place, helping to protect the special qualities, conserve natural resources and the limited supply of suitable land available for development, and also contribute to community wellbeing. However, this will preclude any major housing or economic development.
- 7.2.3. The spatial strategy seeks to support local communities and businesses, through the identification of a range of settlements where economic development and affordable housing to meet local needs will be supported. Evidence and analysis undertaken to support preparation of the draft Local Plan has indicated that there is some capacity for development in all the settlements identified in the spatial strategy, although in some cases the capacity is low, or constraints such as landscape sensitivity, wildlife designations or flood risk may limit development. The sequential approach to re-using existing buildings before new build is considered, will also be positive in relation to a number of

sustainability objectives including landscape character and land, but care will be needed to ensure that this is done in a sympathetic way, particularly for traditional buildings. Where possible the identification of settlements has sought to co-locate housing, employment and service provision in order to reduce the need to travel, but in a small number of Villages and Rural Communities there is no public transport or alternative community transport provision. Some of the larger settlements also have traffic and congestion problems particularly during the peak holiday season, and higher levels of particulates due to the reliance on oil and wood-burning heating systems, which can affect air quality although no standards have been exceeded.

7.2.4. The following sections set out the SA assessments for each policy in more detail, including recommendations made by the SA to strengthen the draft policies, and how these have been taken on board in the draft Local Plan

7.3. **GP1 National Park Purposes and Sustainable Development**

7.3.1. GP1 scored positively for all the SA topics, as would be expected given its purpose to Achieve National Park Purposes and Sustainable Development. Changes have been made to the policy since the original version which accompanied the Options consultation (October 2011, see reference above). This has resulted in the majority of the SA recommendations being taken on board, with the result that most of the SA topics are now well covered in the policy, and are consequently given a strongly positive score.

7.3.2. The policy scored strongly positive in relation to the SA topics **Landscape, Biodiversity and Green Infrastructure**, and **Historic Environment** due to the linkages with the National Park first purpose. GP1 also scored strongly in relation to the SA topics **Community and Wellbeing, Housing**, and **Economy and Employment** due to the linkages with the National Park Authority's duty to foster the social and economic wellbeing of local communities.

7.3.3. GP1 scored also scored strongly positive in relation to the SA topics of **Air Quality and Water Resources, Climate Change and Adaptation to Flood Risk**, and **Land** with clear statements in the policy, Vision and Objectives to support these topics.

7.3.4. For the remaining SA topics of **Climate Change Mitigation and Energy, Coast**, and **Transport**, it was considered that GP1 was positive overall, but that there was still room for improvement in relation to some of the SA criteria. For the SA topic of **Climate Change Mitigation and Energy**, whilst the policy refers to climate change mitigation, there is no specific reference to making the most of opportunities for renewable energy which could help to achieve this. There is also nothing specifically in the policy referring to the coast or coastal change, although these are covered in the Vision and Objectives.

7.3.5. **Recommendations for GP1 National Park Purposes and Sustainable Development**

Recommendations	Changes
Policy GP1 is amended to insert reference to the ' <i>natural beauty, wildlife and cultural</i>	Accepted

<i>heritage of the National Park</i> , mirroring the wording of the National Park's first purpose	
The policy could be strengthened by reference to health and wellbeing	Accepted
The wording of the policy is strengthened to positively support achievement of the Vision and Objectives, rather than avoid adverse impacts on them	The policy wording was changed to 'does not conflict with'
Add ' <i>and helps create and connect habitats and networks of green infrastructure</i> '	Accepted. Networks of green infrastructure now form part of the Policy.
Amend policy to read ' <i>supports the function, sustainability and resilience of individual settlements and their communities</i> '.	The policy has been substantially revised to provide more details of what functions settlements are expected to provide
Make reference to health and community participation, and to services and safe, attractive public spaces.	Accepted.
Add reference to 'local' services, facilities and jobs (2b).	Accepted.
Consider splitting Principle 1 into two principles (one regarding scale, siting etc and intensity of activity, and the other regarding favourable impact on character etc.)	Not accepted. Members wished to reduce the number of principles. It was also felt important to keep all these elements together.
Include reference to local, traditional sustainable building materials (2f).	Accepted.
Make specific reference to affordable housing in the Policy.	Accepted.
Include reference to avoiding or reducing pollution, perhaps in Principle 9	Accepted.

7.4. **GP3 Major Development**

- 7.4.1. General Policy 3 (GP3) sets out the tests against which any proposals for major development in the National Park would be considered. GP3 scored positively for the majority of the SA topics. For the remaining two SA topics of **Housing** and **Economy and employment** there were some positive and negative impacts. In relation to **Housing**, the need for the development would have to be considered against the impact on local communities. There may be benefits from 'small-scale major' housing development (which currently is defined nationally as 10 or more houses) for local communities in meeting

their needs, for example in providing affordable housing. The rigorous tests set out in this policy could discourage delivery of affordable housing. However, there would need to be mitigation or compensation for any harm if the development was permitted. Similarly, in relation to **Economy and employment** there could be benefits to the economy from major development in terms of jobs. However, any major development that impacted on the natural beauty or amenity of the National Park could be a detriment to the economy, particularly tourism.

7.4.2. The SA made recommendations for how the draft policies could be strengthened to increase their positive effects, or avoid negative effects on sustainability. These recommendations were considered by members and officers and changes made accordingly.

7.4.3. **Recommendations for GP3 Major Development**

Recommendations	Changes
Policy GP3 could be strengthened by test (vi) including the avoidance of harm, before mitigation and compensation are sought.	Accepted.
GP3 could be strengthened in relation to the Community Wellbeing, Economy and Employment and Housing topics by reference to the duty on National Park Authorities to foster the social and economic well-being of their communities.	Accepted.
GP3 could be strengthened in relation to the Housing topic by addition of reference in test (vi) to Where a proposal for major development can demonstrate a significant net benefit to the National Park and its local communities.	The policy states that proposals will only be permitted in the exceptional circumstances where it can be demonstrated that they are in the public interest and raise issues of national significance.

7.5. **GP4 Spatial Strategy**

7.5.1. GP4 sets out the spatial strategy for all development within the National Park, identifying where new development will be focussed and what type of development is permitted within the settlements identified under three categories: Local Service Centres, Villages, and Rural Communities.

Table 4 Settlement hierarchy

Local Service Centres	Dulverton Lynton & Lynmouth	Dunster Porlock
Villages	Allerford*	Barbrook

	Brendon Brompton Regis Exford Monksilver Roadwater Timberscombe Winsford Wootton Courtney	Bridgetown/Exton Challacombe Luxborough Parracombe Simonsbath Wheddon Cross/Cutcombe Withypool
Rural Communities	Countisbury Heasley Mill Martinhoe Selworthy West Porlock	Hawkridge Kentisbury Luccombe Oare/Malmsmead Twitchen Withycombe
Porlock Weir	Porlock Weir	

* Allerford was changed to a Rural Community as a result of the SA recommendations – see below

- 7.5.2. The Local Service Centres provide the most extensive range of services and are considered to be the most suitable in principle for development, helping to consolidate employment and services and address the needs of local communities as well as visitors. The Villages have a number of services but not the same range as the Local Service Centres, and sometimes they function collectively with shared facilities. Some development in these Villages will help to sustain them in the long term by providing affordable housing where there is local need, and supporting local services, employment and economic diversification. In both types of settlement, some cross-subsidy by market housing (with a principal residency tie, or for specialist housing) will be allowed where this is necessary to enable a viable development. The smaller Rural Communities have at least one key facility, but some limited development will also help to address affordable housing needs, (although cross-subsidy is not allowed), and employment development through change of use of existing buildings would also be supported (although not new build).
- 7.5.3. GP4 scored strongly positive against the SA objectives of **Community and Wellbeing, Housing, and Economy and Employment** as it supports development in a wide range of settlements, helping to sustain local services and facilities, provide for the housing needs of local communities, and encourage economic development.
- 7.5.4. GP4 was also considered to be positive in relation to **Land and Landscape**. The capacity of the landscape to accommodate development has been assessed for the Local Service Centres and Villages through the Landscape Sensitivity Study⁸. All the settlements were considered to have some capacity for development, although in some cases the capacity is low, or other constraints such as flood risk may limit development. The sequential approach to re-using existing buildings before new build is considered, will also be positive for landscape character and minimise land-take. For the Rural Communities, Landscape

⁸ Landscape Sensitivity Study (2011) Paul Bryan for Exmoor National Park Authority

Sensitivity analysis has not been undertaken, but it is considered that policy safeguards (including the sequential approach) will ensure the level of development is proportionate to the settlement size and will not adversely affect the landscape character or local environment.

- 7.5.5. A positive score was also given in relation to the SA topic of the **Coast**. The main settlements on the coast are Lynmouth and Porlock Weir. The policy approach in the Shoreline Management Plan for Lynmouth is to 'hold the line', meaning that flood defences will be maintained, although any proposed development will still need to take account of the policies on Flood Risk (CC-S1, CC-D1). For Porlock Weir a separate policy approach is included, due to the settlement being identified as a coastal change area (CC-S2).
- 7.5.6. There could be mixed or uncertain effects in relation to the **Historic Environment**. The sequential approach to re-use of existing buildings before new build is considered could help to bring traditional buildings back into viable use, but would need to be carefully considered to ensure that there is no damage to the historic character and fabric of the buildings. Whilst there are other policies that would apply (CE-S4 Cultural Heritage and Historic Environment and CE-D3 Conserving Heritage Assets), reference should be made in the spatial strategy to the impact on historic environment. Some of the settlements identified also have limited capacity due to their heritage assets (including Conservation Areas and listed buildings).
- 7.5.7. There are also mixed implications for **Biodiversity and Green Infrastructure**. Development in some settlements may be constrained due to wildlife, although the policy requires new build development to not adversely affect the local environment which would include biodiversity, and other policy safeguards will ensure protection of designated sites and species (CE-S2 Biodiversity). There could be potential impacts on existing wildlife interest of brownfield sites, but this is covered in the policy which specifies brownfield land 'of low environmental value'. The reuse of existing buildings could also impact on wildlife such as roosting bats and birds, but other policy safeguards cover this. The HRA picks up specific implications in relation to the Special Areas of Conservation and European protected species including bats.
- 7.5.8. There are mixed effects on **Air Quality and Water Resources, and Climate Change Mitigation and Energy**. Overall air and water quality on Exmoor is good, although there are some settlements with local issues of air quality e.g. Dulverton and Porlock due to solid fuel heating, or traffic congestion in Lynton and Lynmouth. Overall levels of development during the Plan period are not likely to significantly affect this. The spatial strategy identifies the Local Service Centres as being the most suitable places in principle for new development. As these are the main centres of population, employment and provide the widest range of services and facilities, they can potentially help to mitigate climate change through the co-location of jobs, housing and services, thus reducing the need to travel. Including additional settlements could increase emissions from travel but equally could reduce the need to travel through helping to co-locate jobs and housing, and levels of additional development in these settlements will be low anyway. There could potentially be additional sewerage requirements for development and abstractions for drinking water

but again overall levels of development are such that any impacts are not likely to be significant.

7.5.9. A mixed score was also given in relation to **Climate Change and Adaptation to Flood Risk**. A number of settlements include areas identified as at risk of flooding, although in the majority of cases there is likely to be capacity outside these areas. However, flood risk could be a constraint to development in some settlements, and this should be reflected in the policy.

7.5.10. **Recommendations for GP4 Spatial Strategy**

Recommendations	Changes
Change Allerford from village to rural community to reflect the limited capacity for new build development given flood risk and environmental constraints	Accepted
Add reference to the historic environment in the policy and supporting text	Accepted
Add reference in the text to other policy constraints such as flood risk which will need to be taken into account	Accepted
Add reference in the policy to the circumstances in which locally identified needs for employment will be met in the Rural Communities through reuse of existing buildings or extensions	Accepted

7.6. **Assessment of identified settlements**

7.6.1. An assessment has also been undertaken of the list of settlements identified in the spatial strategy, see Table 5 below. In addition to the assessment against the sustainability objectives, the settlements were assessed for the Habitats Regulations Assessment, and a number of the scores in relation to **Biodiversity and Green Infrastructure** were changed as a result of this, as shown in the Table.

Table 5 – Summary Scores for Settlements

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

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	Air quality & water resources	Biodiversity & Green Infrastructure	Climate Change & Adaptation to Flood Risk	Climate Change Mitigation and Energy	Community Wellbeing	Economy and Employment	Historic Environment	Housing	Land	Landscape	Coast	Transport
Rural Communities												
Countisbury	0	+/- +	0	0	+	+/-	0	+	++	+/-	0	+
Hawkridge	0	0	0	0	+	+/-	0	+	++	+	0	+
Heasley Mill	0	0	+/-	0	+	+/-	0	+	++	+	0	-
Kentisbury	0	0	0	0	+	+/-	0	+	++	+	0	+
Luccombe	0	+/-	0	0	+	+/-	+/-	+	++	+/-	0	+/-
Martinhoe	0	0	0	0	+	+/-	0	+	++	+	0	+
Oare / Malmsmead	0	+/-	+/-	0	+	+/-	0	+	++	+	0	+
Porlock Weir	0	+/-	+	0	+	+/-	+/-	+	+/-	+/-	+	+
Selworthy	0	+/-	0	0	+	+/-	+/-	+	++	+/-	0	+
Twitchen	0	+/-	+/-	0	+	+/-	0	+	++	+	0	-
West Porlock	0	+/-	0	0	+	+/-	0	+	++	+	0	+
Withycombe	0	0	0	0	+	+/-	0	+	++	+	0	+

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

Changes to the scores for biodiversity as a result of the HRA are show in split cells, with the bottom cell showing the original score and the top cell showing the score following the HRA

7.6.2. The **Local Service Centres** scored strongly positive in relation to the SA topics of **Community and Wellbeing, Employment and Economy, and Housing**, as they have been identified as the settlements most suitable for accommodating development which will support local communities and businesses, and help to address local affordable housing needs. Dunster was given a mixed score for Housing, as it has been assessed to only have low overall capacity for future housing development due to the high landscape and historic value associated with the settlement, and it is only likely to be able to address the housing needs of the parish over the longer term. There are mixed implications in relation to many of the other SA topics, as development could in some cases help to contribute to sustainability objectives through good design, sustainable construction and so on, but it could also lead to impacts or additional pressures. As no specific sites have been identified, each proposal will need to be considered on its own merits against the policies in the Local Plan.

7.6.3. The **Villages** also scored positively in relation to the SA topics of **Community and Wellbeing, Employment and Economy, and Housing**, as their identification as settlements will enable development which will help to meet the needs of the local community (for affordable housing and retaining services and facilities) and support local businesses, although the scale of development will need to be proportionate to the settlement size and capacity. Development in some Villages may be constrained by environmental factors

including **biodiversity, cultural heritage, landscape** sensitivity or **flood risk**, but in the majority of cases there is considered to be sufficient capacity for some development to take place, particularly given the sequential approach to considering reuse of existing buildings first, and policy safeguards to ensure proposals do not damage such assets. Two settlements (Allerford⁹ and Timberscombe) were identified with significant **flood risk** constraints that, along with other environmental considerations, could reduce capacity for new build development in the settlement. Levels of development in the Villages were not considered to be significant in relation to **climate change mitigation** or **air quality and water resources**. However, two settlements (Brompton Regis and Simonsbath) were identified where there may be water quality issues associated with sewerage, and care would be needed to ensure that future development did not exacerbate this. **Transport** implications could be an issue for two of the Villages (Brendon and Challacombe) which do not have public or community transport and so will primarily rely on access to a private car.

- 7.6.4. Identification of the **Rural Communities** will also help to support those communities through the provision of affordable **housing**, and potentially maintenance of **community** facilities and services. There could be some economic development, but only through change of use, not new build, hence a mixed score was given for this SA topic. The policy approach will be positive in relation to **land**, as the sequential approach will require reuse of existing buildings first, with new build being restricted to affordable housing only (with no cross-subsidy), thus requiring less land take. As with the Villages, development in some Rural Communities may be constrained by environmental factors including **biodiversity, cultural heritage, landscape** sensitivity or **flood risk**, but in the majority of cases there is considered to be sufficient capacity for some development to take place, particularly given the sequential approach to considering reuse of existing buildings first, and policy safeguards to ensure proposals do not damage such assets. Lack of public or community **transport** will be an issue in a number of Rural Communities.
- 7.6.5. The HRA identified a number of settlements where the presence of internationally important habitats and protected species would need to be taken into account, and any development requiring land take may require a test of likely significance under the Habitats Regulations 2010.
- 7.7. **GP5 Securing Planning Benefits – Planning Obligations**
- 7.7.1. GP5 is an enabling policy for planning obligations or potentially a Community Infrastructure Levy (CIL) to ameliorate the impact of proposals and contribute to the provision of infrastructure necessary to support the development. The policy does not include specific proposals for infrastructure to be included, so cannot be assessed in terms of impacts on a number of SA objectives – these would have to be considered on a case by case basis.
- 7.7.2. GP5 was considered to be positive in relation to the SA topics of **Community and Wellbeing, Housing, and Economy and Employment**. The policy is aimed at supporting

⁹ Allerford was changed to a Rural Community as a result of the SA recommendations

vibrant communities, local businesses and the economy by providing the infrastructure necessary to support development. Affordable housing can be provided through planning obligations or a CIL, however open market housing is only allowed in certain circumstances to cross-subsidise affordable housing.

7.7.3. A neutral score was given in relation to the other SA topics. Depending on the type of infrastructure being proposed, there could be positive or negative implications for example in relation to flood risk, landscape, wildlife or cultural heritage. However these would have to be considered based on the specific proposals and in relation to other policies in the Plan.

7.7.4. **Recommendations for GP5 Securing Planning Benefits – Planning Obligations**

Recommendations	Changes
Add reference to the provision of green infrastructure, which might be a beneficial use of planning obligations / CIL	No changes made. The text already refers to elements of green infrastructure such as open spaces, recreational and sports fields

7.8. **GP6 Enhancing the National Park’s Special Qualities**

7.8.1. General Policy 6 is intended to ensure that new development seeks to enhance, rather than just conserve, the National Park’s special qualities including its natural beauty, wildlife and cultural heritage.

7.8.2. GP6 scored strongly positive for the SA topics of **Landscape, Biodiversity and Green Infrastructure**, and **Historic Environment** as the policy aims to enhance these assets including through the removal of visually intrusive structures and improvements to the character of the area and its setting. Although there is no specific reference to **Climate Change Mitigation and Energy**, there may be indirect benefits through for example reuse of buildings which would contribute to climate change mitigation through the use of embodied energy. Similarly, enhancements through habitat creation such as woodland planting would also help to sequester carbon.

7.8.3. There would also be benefits for **Community and Wellbeing** and **Economy and Employment** as proposals will be required to demonstrate an overall benefit including benefits to the community. This could include removal or relocation of non-conforming uses which may be ‘un-neighbourly’, benefitting communities and the economy generally as it will make a better environment for local people, businesses and also benefit tourism. If larger, more complex opportunities for enhancement arise, these would need a development brief to bring together enhancement and socio-economic opportunities to deliver the most sustainable outcome for the community.

7.8.4. The policy does not refer to enhancing natural resources such as **Land**, and **Air Quality and Water Resources**, although enhancement of contaminated sites for example could provide

opportunities to remove pollutants or reduce risk to natural resources. These SA topics were therefore given a neutral score.

7.8.5. There are no specific implications in relation to the SA topics of **Housing, Transport, Coast** or **Climate Change and Adaptation to Flood Risk**.

7.8.6. **Recommendations for GP6 Enhancing the National Park’s Special Qualities**

Recommendations	Changes
Add reference to the enhancement of natural resources (including contaminated land) to the policy and supporting text	Accepted

8. Appraisal of Draft Local Plan Policies – Chapter 5 Conserving and Enhancing Exmoor

8.1. Overview

8.2. This Chapter covers the following Policies:

- CE-S1 Landscape Character
- CE-D1 Protecting Exmoor’s Dark Night Sky
- CE-S2 Biodiversity
- CE-S3 Green Infrastructure
- CE-D2 Green Infrastructure Provision
- CE-S4 Cultural Heritage and Historic Environment
- CE-D3 Conserving Heritage Assets
- CE-S5 Principles for the Conversion or Structural Alteration of Traditional Buildings
- CE-S6 Principles for the Conversion or Structural Alteration of Non-Traditional Buildings
- CE-S7 Design and Sustainable Construction Principles
- CE-D4 Advertisements
- CE-S8 Small Scale Working or Re-working for Building and Roofing Stone
- CE-S9 Major Mineral Extraction
- CE-D5 Interim Development Orders

8.3. A summary of the scores for these Policies is given in **Table 6** (please refer to the key for the scoring system at Table 1, page 8).

Table 6 – Summary scores for Draft Policies Chapter 5: Conserving and Enhancing Exmoor

SA topics	CE-S1	CE-D1	CE-S2	CE-S3 CE-D2	CE-S4 CE-D3	CE-S5 CE-S6	CE-S7	CE-D4	CE-S8 CE-D5	CE-S9
Air quality and water resources	0	0	+	++ +	0	+	+	0	+	+ -
Biodiversity and Green Infrastructure	++	++	++	++	0	+	+	0	+	+ -
Climate change and adaptation to flood risk	+	0	++	++	++	0	+	0	+	0
Climate change mitigation and energy	+/-	+	+/-	+	+/-	+	++	0	+	+
Community wellbeing	+	+	+	+	+	0	++	+	+	+
Economy and employment	+	+	+/-	+	+	+	+	+	+	0

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SA topics	CE-S1	CE-D1	CE-S2	CE-S3 CE-D2	CE-S4 CE-D3	CE-S5 CE-S6	CE-S7	CE-D4	CE-S8 CE-D5	CE-S9
Historic environment	++	+	0	+	++	++	++	++	+	+
Housing	+/-	+	+/-	+	+/-	0	+	0	0	0
Land	+/-	0	+/-	+	+	+	+	0	+	+
			-							
Landscape	++	++	+/-	++	++	+	++	++	+	+
Coast	+	+	+	+	++	0	+	0	0	0
Transport	+/-	+	-	+	-	0	+/-	+	+	+

Split cells indicate where scores have changed as a result of the SA, the bottom cell shows the original score, and the top cell shows the score following the SA

8.4. **Overall Assessment of Draft Policies Chapter 5 Conserving and Enhancing Exmoor**

- 8.4.1. There are a number of positive and strongly positive scores for this Chapter, as would be expected as it primarily relates to the conservation and enhancement of Exmoor, including policies on landscape character, dark night time skies, biodiversity, green infrastructure, and cultural heritage, which link very closely with the National Park purposes. There are also policies concerning design and sustainable construction, the conversion of buildings, advertisements and signage, and mineral extraction.
- 8.4.2. The strong protection of the National Park’s landscape, wildlife, cultural heritage and special qualities means that there are mixed or negative effects on other SA objectives, including transport, land, and housing. This is because the protection of these special qualities could constrain development, including the provision of housing, the conversion of buildings, transport infrastructure upgrades, or in some cases, increased access and recreation (if this was to lead to disturbance of protected wildlife species for example). However, the policies seek to enable development where possible, promoting high quality design and use of traditional and sustainable materials where appropriate to ensure that development adds to the character and local distinctiveness, and does not damage the environmental assets for which the National Park was designated.
- 8.4.3. The policies are generally positive for local communities as maintaining the high quality natural and built environment is important to people’s health and well-being. Similarly, the high quality environment benefits the economy, as it is what attracts many people to live, work and visit the National Park. The policies could constrain some economic development, particularly large-scale, intrusive developments or activities. However this

is balanced by the benefits to the tourism sector, which relies on the high quality environment as a major draw for visitors.

8.4.4. There are some mixed implications in relation to Climate Change Mitigation. There is recognition of the need to support climate change mitigation, particularly through the re-use of existing buildings which will take account of the embodied energy within these buildings. There are also opportunities for mitigation through carbon sinks including peatland restoration, and renewable energy. However, conservation of the National Park's landscape character, biodiversity and historic environment is likely to be one of the main constraining factors affecting renewable energy technologies, particularly large-scale wind turbines which are identified as potentially affecting visual amenity, and roof-mounted solar PV panels which can adversely affect the character and appearance of traditional buildings.

8.4.5. The following sections set out the SA assessments for each policy in more detail.

8.5. **CE-S1 Landscape Character**

8.5.1. CE-S1 aims to conserve and enhance the landscape character of the National Park, consistent with the first statutory purpose of its designation.

8.5.2. CE-S1 scored strongly positive in relation to the SA topics **Landscape, Biodiversity and Green Infrastructure** and **Historic Environment** due to the linkages with the National Park first purpose. This is a core policy for delivering the statutory purpose particularly to conserve and enhance landscape character. Wildlife and habitats are considered to be an integral part of landscape character, therefore they are inextricably linked. The policy also refers to historic and cultural heritage including Heritage Coast, conserving the character of settlements which contributes to local distinctiveness, and historic field patterns and features. However, the text could be strengthened by a cross-reference to CE-S2 Biodiversity and CE-S4 Cultural Heritage.

8.5.3. CE-S1 scored positively in relation to the SA topic of **Climate Change and Adaptation to Flood Risk**. The text refers to landscape resilience and the need to ensure that landscapes are effective at mitigating and / or adapting to the effects of climate change. The Policy does not specifically refer to climate change adaptation, although it includes taking opportunities to conserve, enhance or restore important landscapes or landscape features which could include opportunities arising as a result of climate change. The text could be strengthened by adding a cross-reference to CC-S1 Climate Change.

8.5.4. CE-S1 also scored positively in relation to the SA topics of **Community and Wellbeing**, and **Economy and Employment**. Maintaining the high quality of the landscape is important to people's health and well-being in general. The landscape provides inspiration and is what attracts people to visit and enjoy the National Park. This is reflected in the text, and the aim of the policy is to protect the landscape character that is valued by local communities and visitors alike. Similarly, landscape character is crucially important to the economy, it is what attracts many people to live, work and visit the National Park, although economic activity can damage landscape character if not undertaken sensitively, and the aim of the

policy is to ensure that development proposals are informed by and complement landscape character. There is no reference to the importance of landscape character to the economy, and this should be reflected in the text.

- 8.5.5. CE-S1 scored positively in relation to the SA topic of **Coast**. Seascapes are recognised as part of the character of the National Park and the policy required development to be appropriate in relation to the conservation of seascape attributes, including Exmoor's Heritage Coast. The text also references links to marine spatial planning and the need to work with the marine planning authority to ensure that Exmoor's high quality seascape is maintained.
- 8.5.6. There were both positive and negative implications in relation to the SA topic of **Climate Change Mitigation and Energy**. The text refers to landscape resilience and the need to ensure that landscapes are effective at mitigating and/or adapting to the effects of climate change. It picks up the opportunities for carbon sinks including peatland restoration and opportunities arising from renewable energy. Whilst the Policy does not specifically refer to climate change mitigation, it includes taking opportunities to conserve, enhance or restore important landscapes or landscape features which could be in response to climate change. However, landscape character is one of the main constraining factors affecting new development and renewable energy technologies are identified as potentially affecting visual amenity, particularly wind turbines. The Policy could therefore affect the National Park's ability to mitigate climate change through renewable energy unless proposals are sensitively sited and screened.
- 8.5.7. There were also both positive and negative implications in relation to the SA topic of **Housing**. The National Park statutory purpose is to conserve and enhance landscape character and this is one of the main constraining factors on providing housing within Exmoor. However, as affordable housing is a priority within the National Park, a landscape sensitivity study¹⁰ has been undertaken to identify broad areas where housing could be accommodated within the named settlements without detriment to the landscape character.
- 8.5.8. CE-S1 also has both positive and negative implications in relation to the SA topic of **Land**. Landscape character is likely to constrain certain activities within the National Park, including mineral extraction and waste disposal. However, the aim of the policy to conserve landscape character could indirectly support the re-use of land and buildings.
- 8.5.9. There were both positive and negative implications in relation to the SA topic of **Transport**. Landscape character is the main constraint on development including telecommunications infrastructure. The text highlights the particular impacts that vertical structures such as telecommunications masts can have on visual amenity, and the need for these to be appropriately screened. The policy requires that development proposals will need to be informed by and complement landscape character and take into account the visual impact of development in its immediate and wider setting. However, the text also refers to work to develop a more sensitive approach to signage and road management on

¹⁰ Landscape Sensitivity Study (2013) Paul Bryan for Exmoor National Park Authority

Exmoor, including under-grounding telecommunication lines, which will enhance landscape character

8.5.10. There were not considered to be any relevant implications for the SA topic of **Air Quality and Water Resources**.

8.6. **Recommendations for CE-S1 Landscape Character**

Recommendations	Changes
Add a reference in the supporting text to biodiversity and the historic environment as integral parts of landscape character and cross-reference to CE-S2 Biodiversity and CE-S4 Cultural Heritage	Partly accepted – references made to historic environment but not biodiversity, although the text already includes reference to some wildlife features such as hedgerows and orchards
Strengthen the text on landscape resilience in relation to climate change adaptation and mitigation and add a cross-reference to Chapter 6 on climate change	Accepted
Add a reference in the text to the role of the landscape in benefiting the economy	Accepted

8.7. **Policy CE-D1 Protecting Exmoor’s Dark Night Sky**

8.7.1. Development Management Policy CE-D1 aims to protect Exmoor’s dark night time skies from light pollution, reflecting the importance of dark skies to tranquility and the recognition of this through the designation of Exmoor National Park as the first Dark Sky Reserve in Europe.

8.7.2. Policy CE-D1 scored strongly positive for the SA topic of **Biodiversity and Green Infrastructure**. The policy and text reflect the fact that light pollution is known to adversely impact on wildlife and their habitats. Bats are highlighted as an example of a species particularly sensitive to external lighting. The policy aims to reduce all forms of external light spillage and avoid adverse impacts on wildlife and habitats.

8.7.3. Policy CE-D1 also scored strongly positive for **Landscape**. The aim of the policy to conserve the tranquillity and dark sky experience of the National Park will strongly support the objective to protect and enhance landscape character. The policy specifically refers to avoiding adverse impacts on the visual character of the landscape.

8.7.4. Policy CE-D1 scored positively for **Climate Change Mitigation and Energy**. The text recognises that ensuring lighting is efficient will help reduce carbon emissions and contribute to climate change mitigation. The policy seeks to reduce all unnecessary forms of outdoor lighting which will help reduce demand for energy, although this is not specifically referenced. Policy CE-D1 could be improved by adding a reference to ‘efficiency’ of lighting to reduce demand for energy and therefore contribute to climate change mitigation.

- 8.7.5. Policy CE-D1 scored positively for **Community and Wellbeing**. Dark night time skies are an important aspect of tranquillity, which supports the health and well-being of communities. The text recognises the growing public interest in the night sky and support for reducing light pollution. The text also recognises the work by Highways Authorities and ENPA with communities to introduce part-night lighting in some settlements. The policy ensures that lighting management and design is consistent with safety, and proposals will be allowed where they are required for safety, security or community reasons.
- 8.7.6. Policy CE-D1 scored positively for **Economy and Employment** as the designation of Exmoor as a Dark Sky Reserve will be beneficial for the tourism sector and local employers. The text could be improved by adding a reference to the importance of the Dark Sky reserve status to the tourism industry.
- 8.7.7. Policy CE-D1 scored positively for **Historic environment** - The policy and text do not specifically refer to the historic environment, although this will be an important consideration for any new lighting proposed. Lighting can enhance as well as detract from historic buildings. Policy CE-D1 could be strengthened by reference to the historic environment.
- 8.7.8. Policy CE-D1 scored positively for **Housing**. The text recognises that there may be occasions when lighting is required for safety or community reasons.
- 8.7.9. Policy CE-D1 scored positively for **Coast**. The policy does not currently refer to the coast or seascapes, although the undeveloped nature of the coast is an important quality of the National Park’s seascapes, so unnecessary lighting should be avoided. Policy CE-D1 could be strengthened by reference to seascapes.
- 8.7.10. Policy CE-D1 scored positively for **Transport**. The text refers to working with Highways Authorities and communities to reduce lighting within streets and car parks, although this should not adversely impact on issues of safety or community need.
- 8.7.11. Policy CE-D1 was considered to be neutral in relation to the SA topic of **Air quality and Water Resources** as it does not have any direct relevance to air or water quality, although Exmoor’s air quality is generally good, and this contributes to the overall quality and visibility of the dark night time skies. The policy was also not considered to have any direct relevance to the SA topics of **Climate Change and Adaptation to Flood Risk**, and **Land** and so scored neutral for these as well.
- 8.7.12. **Recommendations for CE-D1 Protecting Exmoor’s Dark Night Sky**

Recommendations	Changes
Add a reference to ‘efficiency’ of lighting to reduce demand for energy and therefore contribute to climate change mitigation	Accepted
Add reference in the text to the importance	Accepted

of the Dark Sky reserve status to tourism	
Amend the policy to refer to cultural heritage and the historic environment	Accepted
Add a reference to seascapes	Accepted

8.8. **CE-S2 Biodiversity**

- 8.8.1. CE-S2 aims to protect and enhance the wildlife and habitats on Exmoor, in accordance with the National Park’s first purpose and this is a key policy to help deliver the statutory purpose.
- 8.8.2. CE-S2 scored strongly positive against the SA topic of **Biodiversity and Green Infrastructure**, as would be expected. The policy aims to protect and enhance the range of wildlife and habitats on Exmoor, recognising the legal protection afforded to many of them, and locally important biodiversity. It also encourages linkages and connections to be made to enhance biodiversity, including through green infrastructure and linkages across the National Park boundary to neighbouring authorities.
- 8.8.3. CE-S2 also scored strongly positive against the SA topic **Climate Change and Adaptation to Flood Risk**. The policy encourages proposals to enable habitats and species to adapt to climate change, including measures to extend and connect habitats which will help build resilience.
- 8.8.4. CE-S2 scored positively for the SA topic of **Air Quality and Water Resources**. Exmoor’s good quality air and water are important for the wide range of species and habitats on Exmoor. The policy will indirectly help to conserve air and water quality through protection of habitats. The text could be strengthened by adding reference to opportunities arising for people to understand and enjoy nature, including through green infrastructure.
- 8.8.5. CE-S2 scored positively for the SA topic of **Community and Wellbeing**. The text refers to the importance of wildlife and ecosystems for sustaining a healthy planet and delivering essential benefits for people, including wellbeing. The text could be strengthened by reference to opportunities arising for people to understand and enjoy nature, including through green infrastructure.
- 8.8.6. CE-S2 scored positively for the SA topic of **Coast**. The policy includes important coastal habitats such as coastal heaths and coastal vegetated shingle. The impact of climate change and sea level rise on these habitats is recognised.
- 8.8.7. There were both positive and negative implications for the SA topic of **Climate Change Mitigation and Energy**. The policy support proposals that enables climate change mitigation including through carbon storage, providing they do not adversely affect the integrity or special interest of the site. However, potential impacts on wildlife or habitats could constrain renewable energy proposals which are important for climate change mitigation.

- 8.8.8. CE-S2 also scored both positively and negatively for **Economy and Employment**. Wildlife is an important part of what attracts people to live, work and visit Exmoor and therefore helps directly and indirectly to support the local economy and tourism sector. Conversely, the protection of habitats and species can be a constraint on economic development. The text could be improved by adding reference to the benefit of wildlife to the local economy and tourism, as an important part of what attracts people to work in and visit Exmoor.
- 8.8.9. There were both positive and negative implications for the SA topic of **Housing**. The protection of species and habitats can constrain the location of new housing or conversion of existing buildings. However, the text includes reference to protection of species such as bats and barn owls and measures to ensure that access and breeding or roosting sites are provided.
- 8.8.10. There were also positive and negative implications for the SA topic of **Landscape**. Biodiversity is an integral part of landscape character; however the creation or restoration of habitats will potentially change landscape character, so the two policies need to be considered together. The text could be strengthened by including reference to the integral connections between biodiversity and landscape character, and cross-reference to CE-S1 Landscape Character.
- 8.8.11. CE-S2 scored negatively in relation to the SA topic of **Land**. The re-use of land and buildings can conflict with biodiversity objectives where there is existing biodiversity value. The text could be improved by reference to potential conflict between existing biodiversity value of previously development land and buildings.
- 8.8.12. CE-S2 also scored negatively for the SA topic of **Transport**. The protection of important habitats and species could constrain access and recreation, particularly where species are sensitive to disturbance. The National Park statutory purposes are to conserve landscape, wildlife and cultural heritage; and promote understanding and enjoyment. However, the Sandford principle¹¹ would be applied where these conflict, giving greater weight to conservation of biodiversity.
- 8.8.13. There were not considered to be any specific issues relating to **Historic Environment**, so CE-S2 was given a neutral score for this theme.
- 8.8.14. **Recommendations for CE-S2 Biodiversity**

Recommendations	Changes
Add reference in the supporting text to opportunities arising for people to understand and enjoy nature, including through green infrastructure	No changes made. Covered in CE-S3 Green Infrastructure
Add reference in the text to the benefit of	Accepted

¹¹ The Sandford Principle was established as part of the Environment Act 1995, to give greater weight to the first purpose where there are irreconcilable conflicts.

wildlife to the local economy and tourism, as an important part of what attracts people to work in and visit Exmoor	
Include reference in the text to potential conflict between existing biodiversity value of previously developed land and buildings	Accepted
Include reference in the text to the integral connections between biodiversity and landscape character, and cross-reference to CE-S1 Landscape Character	Accepted

8.9. CE-S3 Green Infrastructure, CE-D2 Green Infrastructure Provision

- 8.9.1. These policies encourage the positive planning of green infrastructure, which is defined as a wide range of high quality natural, semi-natural and amenity green spaces and other environmental features. Green infrastructure is multi-functional and can provide benefits for wildlife, carbon storage, flood protection, water purification as well as for local communities in terms of access and recreation, health and wellbeing.
- 8.9.2. The policies are strongly positive in relation to the SA topics of **Biodiversity and Green Infrastructure** and **Landscape**, as the aim of the policy is to deliver green infrastructure and landscape enhancements as part of this, including linkages across National Park boundaries which will support habitat connectivity and movement of species thorough the landscape as well as enhancing the landscape and setting of the National Park. They are also strongly positive in relation to **Climate Change and Adaptation to Flood Risk**, with clear references to the opportunities green infrastructure brings to provide flood protection, including examples such as the multi-objective flood management demonstration scheme on the Holnicote Estate.
- 8.9.3. The policies are positive for all the remaining SA topics. In relation to **Air Quality and Water Resources** and the **Coast**, the policies clearly identify the water environment as an element of green infrastructure including coast, rivers, streams, floodplains, ponds, lakes and sustainable drainage systems. However, there is no specific reference to air quality, although green infrastructure and open space can act as the ‘green lungs’ of a settlement and generally will contribute to air quality. There are also benefits for **Climate Change Mitigation and Energy** for example through carbon storage including woodland planting and mire restoration, as well as reducing carbon emissions from transport by providing alternative access routes. The creation and enhancement of green infrastructure can also help to safeguard **Land**, and potentially deal with contamination.
- 8.9.4. Green infrastructure can benefit **Community and Wellbeing** including physical and mental health and **Housing**. High quality natural environments have been shown to foster healthy communities and green spaces encourage social activity. There are also potential benefits to the **Economy and Employment**, directly through employment in capital projects and future management, and indirectly through sustaining a high quality environment to attract visitors and businesses to Exmoor. There could also be **Transport** benefits, through the

opportunities green infrastructure brings to encourage sustainable modes of travel and providing alternative access routes.

8.9.5. Whilst there are no direct benefits for the **Historic Environment**, the policies were still considered to be positive, as if done well, green infrastructure contributes to the high quality design and character of an area. The policy requires green infrastructure proposals to protect and enhance existing historic environments. A holistic understanding of the area is necessary when planning green infrastructure to ensure that it fits within the historic environment.

8.9.6. **Recommendations for CE-S3 Green Infrastructure, CE-D2 Green Infrastructure Provision**

Recommendations	Changes
The policy and supporting text clearly identify blue infrastructure as an element of GI with reference to the water environment. However, there is no specific reference to air quality, although GI and open space can act as the ‘green lungs’ of a settlement and generally will contribute to air quality. Add reference in the text to the contribution to air quality	Accepted

8.10. **CE-S4 Cultural Heritage and Historic Environment, and CE-D3 Conserving Heritage Assets**

8.10.1. Policy CE-S4 aims to protect and enhance the cultural heritage and historic environment on Exmoor, in accordance with the National Park’s first purpose and this is a key policy to help deliver the statutory purpose. CE-D3 sets out the approach to managing development affecting heritage assets in the National Park.

8.10.2. As would be expected, the policies scored strongly positive for the SA topic **Historic Environment**, as the aim of the policy is to conserve and enhance the cultural heritage of the National Park. The policies also scored strongly positive in relation to **Landscape**, recognising that the historic environment and cultural heritage are an integral part of landscape character. The policy includes historic landscapes, registered historic parks and gardens, and the historic or architectural character of settlements.

8.10.3. The policies also scored strongly positive for the SA topic **Climate Change and Adaptation to Flood Risk**. The implications of climate change for the historic environment are recognised in the text, both in terms of the need for alterations to historic assets to adapt to climate change, and the impact this could have on the special interest of the building or site. The policy supports measures to adapt to climate change where required to safeguard the heritage asset, were their special interest will be conserved. Similarly, the policies score strongly positive in relation to the **Coast**, The policy considers the implications of climate change and sea level rise on heritage assets. The text recognises that sea level rise is likely

to directly impact on sites, and the policy seeks to ensure that where such sites are likely to be lost, they are preserved through record.

- 8.10.4. The policies scored positively for the SA topic of **Community and Wellbeing**. Cultural heritage is an integral part of local communities and local distinctiveness. The aim of the policy is to protect and enhance heritage assets including their conservation for future generations. The policy supports measures to promote the understanding and enjoyment of the heritage asset or better revealing their significance. Although the protection of historic assets could constrain the installation of infrastructure for broadband or mobile technology, on balance the overall score is still considered to be positive as potential restrictions on infrastructure can be mitigated.
- 8.10.5. The policies also scored positively for the SA topic of **Economy and Employment**. The text recognises that cultural assets contribute to the economy, but further explanation could be given, particularly the importance of cultural heritage to the tourism sector. The policy enables heritage assets that are redundant or at risk to be brought back into a viable use. Similarly, the policies scored positively for the SA topic of **Land** as they promote the re-use of buildings, which also contributes to the reduction of waste and use of embodied energy.
- 8.10.6. There were both positive and negative implications in relation to the SA topic of **Climate Change Mitigation and Energy**. The need to support climate change mitigation is reflected in the text, including the opportunity to re-use existing buildings and therefore take account of the embodied energy within these buildings. The Policy also supports measures to mitigate climate change where these would not harm the special interest or appearance of the heritage asset. However, the protection of historic assets could constrain the application of certain renewable energy technologies.
- 8.10.7. There were both positive and negative implications in relation to the SA topic of **Housing**. The policy encourages the re-use of redundant or at risk buildings which could include for affordable housing. However, the restrictions to alterations to historic buildings could prevent conversion for affordable housing.
- 8.10.8. The policies scored negatively in relation to **Transport** as the historic nature of many of Exmoor’s settlements restricts opportunities for transport improvements, measures to ease traffic congestion, new car parks and so on.
- 8.10.9. The policies did not have any relevant issues relating to the SA topics of **Air Quality and Water Resources**, or **Biodiversity and Green Infrastructure**, so were given a neutral score for these topics.
- 8.10.10. **Recommendations for CE-S4 Cultural Heritage and Historic Environment and CE-D3 Conserving Heritage Assets**

Recommendations	Changes
Add reference to the importance of cultural heritage to the economy and employment,	Accepted

particularly the tourism sector in the text	
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8.11. **CE-S5 Principles for the Conversion or Structural Alteration of Traditional Buildings; CE-S6 Principles for the Conversion or Structural Alteration of Non-Traditional Buildings**

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

- 8.11.6. **Recommendations for CE-S5 Principles for the Conversion or Structural Alteration of Traditional Buildings; CE-S6 Principles for the Conversion or Structural Alteration of Non-Traditional Buildings**
- 8.11.7. No Recommendations
- 8.12. **CE-S7 Design and Sustainable Construction**
- 8.12.1. Policy CE-S7 aims to promote high quality design and sustainable construction standards.
- 8.12.2. CE-S7 scored strongly positive in relation to **Climate Change Mitigation and Energy**. The policy promotes sustainable construction methods incorporating methods that help reduce carbon emissions e.g. passive design techniques, energy efficiency, use of renewable energy technologies, sustainable drainage systems, water conservation measures and so on. The policy does not set local standards for sustainable construction due to the low levels of development within the National Park, but relies on the national standards (Code for Sustainable Homes, BREEAM) being applied through Building Regulations.
- 8.12.3. CE-S7 also scored strongly positive for **Community and Wellbeing**. The use of sustainable construction principles will provide benefits for health and wellbeing. The policy also encourages measures to improve safety and accessibility and to promote footpaths and cycle-ways. It also requires that new development should not affect the amenity of surrounding properties and occupiers.
- 8.12.4. The policy scored strongly positive for the SA topics of **Landscape and Historic Environment**. The policy seeks to enhance local distinctiveness and landscape character. Development should contribute positively to its setting. Materials and design must be sympathetic to the local vernacular context. The policy requires development to enhance local identity and distinctiveness of the built environment. It requires materials to be sympathetic to the local vernacular context; reinforces landscape features including traditional features such as stone walls; and requires the layout to respond to local character and the proportions of the historic street pattern. New additions or extensions to existing traditional buildings should reflect the historic significance, character and appearance of the original building through sensitive design and use of traditional materials. They should also complement the form, character and setting of the original building.
- 8.12.5. CE-S7 scored positively in relation to **Land**. The use of local materials will support local sustainable mineral extraction. Waste and resource use will be minimised by reuse of buildings and materials; management of site waste; and provision of adequate recycling facilities.
- 8.12.6. CE-S7 scored positively in relation to the SA topics **Air Quality and Water Resources, Climate Change and Adaptation to Flood Risk and Coast**. The policy promotes sustainable construction standards including water conservation measures, sustainable drainage

systems which will also protect water quality. Building to sustainable standards including passive design and utilising renewable energy technologies should reduce the need for heating from non-renewable resources, which will help maintain good air quality. The policy includes measures to future proof development against climate change impacts including flood risk, by incorporating measures such as sustainable drainage systems.

- 8.12.7. CE-S7 scored positively in relation to **Biodiversity and Green Infrastructure**. The policy requires measures to maintain, promote or restore biodiversity. Many sustainable construction measures will be indirectly beneficial for wildlife, e.g. water conservation measures will reduce the need to extract water from the environment; landscaping can have benefits for wildlife.

- 8.12.8. CE-S7 scored positively in relation to **Economy and Employment**. The use of traditional building materials and methods will support local craftsmen and trades and the retention of these traditional skills. Similarly the promotion of sustainable construction methods including renewable energy technologies could provide jobs for local installers and suppliers.

- 8.12.9. CE-S7 scored positively in relation to **Housing** as the policy includes Secured by Design, which will improve safety and reduce opportunities for crime. It should also reinforce inclusive design and accessibility which will help meet the requirements of a diverse range of households including older and disabled people. Also, the sustainable construction principles include energy efficiency requirements which will improve the quality of homes built and avoid future problems of fuel poverty.

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

8.12.11. **Recommendations for Policy CE-S7 Design and Sustainable Construction**

Recommendations	Changes
Add reference in the text to benefits to the local economy and employment from traditional and sustainable construction	Accepted

8.13. **CE-D4 Advertisements, shop fronts and private road signs**

- 8.13.1. Policy CE-D4 sets out the approach to managing advertisements, shop fronts and private road signs within the National Park.

- 8.13.2. Policy CE-D4 scored strongly positive in relation to **Landscape** and **Historic Environment** as it recognises that traditional shop fronts and signage play an important role in contributing to the character and historic environment of settlements, and seeks to ensure that there is no adverse effect (either individually or cumulatively) on landscape and distinctiveness including visual amenity and tranquillity. The Policy promotes the use of vernacular design, traditional materials and proportions appropriate to the scale of the building and its surroundings and requires the design and appearance of advertisements, shop fronts or private road signs to enhance the landscape and streetscape. It also encourages the enhancement of existing buildings or the landscape through the redesign or removal of existing advertisements or fascia.
- 8.13.3. Policy CE-D4 scored positively in relation to **Community and Wellbeing**, as it promotes amenity through design, and public safety. Similarly it was positive for **Economy and Employment** as it recognises that private road signs can be important for visitor attractions and facilities. It was also positive for **Transport** as private road signs will be permitted in accordance with the policy.
- 8.13.4. For the remaining SA topics this policy was not considered to have particular relevance, and so was given a neutral score.
- 8.13.5. **Recommendations for CE-D4 Advertisements, shop fronts and private road signs**
- 8.13.6. None identified.
- 8.14. **CE-S8 Small Scale Working or Re-working for Building and Roofing Stone; and CE-D5 Interim Development Orders**
- 8.14.1. A number of Exmoor's older buildings were constructed of local stone. Policy CE-S8 therefore seeks to encourage the small scale working or reworking of quarries for building and roofing stone. There is one minerals permission for Barlynch Quarry that has an Interim Development Order (IDO) permission, and Policy CE-D5 sets out the approach that will be taken, should a proposal come forward to reopen the site.
- 8.14.2. The policies were considered to be positive for all of the SA topics, apart from the **Coast** and **Housing**, where no specific implications were identified.
- 8.14.3. CE-S8 will be particularly important for the **Historic Environment**, as the provision of local stone adds to local character and distinctiveness and can be important to enable repair of heritage assets. However, care needs to be taken in re-opening former sites as they can be of interest themselves from a historic perspective. The policy refers to the restoration of sites but does not include opportunities for enhancing the historic environment or increasing understanding and enjoyment of this.
- 8.14.4. The hierarchical approach set out in the NPPF and referenced in the supporting text is to first reduce the quantity of material used and waste generated; then use as much recycled and secondary material as possible, before finally securing the remainder of material

needed through new primary extraction. This will contribute to **Climate Change Mitigation and Energy** through reducing emissions. CE-S8 supports small scale extraction where this would reduce 'stone miles'. There is also reference to the avoidance of flood risk during operations, which is positive for the SA topic of **Climate Change and Adaptation to Flood Risk**.

- 8.14.5. In relation to **Biodiversity and Green Infrastructure**, CE-S8 requires that proposals should not adversely affect wildlife but there is no mention of potential geological interest. Reworking of former sites may not always be appropriate due to the wildlife interest that has established, or because they are of interest from a geological perspective. Similarly, CE-D5 also requires that IDO permissions should mitigate and control any adverse impact on wildlife but again, geological interest is not specifically referenced. If the site has been designated as a Regionally Important Geological Site (RIGS), it would be covered by CE-S2 Biodiversity & Geodiversity.
- 8.14.6. The policies include safeguards to ensure that proposals and operations do not adversely affect **Landscape** and tranquillity. Similarly, in relation to **Land**, the policies require restoration of land after extraction ceases, and CE-S8 requires any waste to be reused or recycled.
- 8.14.7. There are also safeguards to ensure that there are no adverse impacts on **Community and Wellbeing**, setting out requirements for operations in relation to noise, dust, pollution and so on and ensuring that proposals do not adversely affect health. Restoration of sites could provide opportunities for recreation and enhanced understanding and enjoyment (including for educational purposes e.g. RIGS).
- 8.14.8. The provision of minerals is important for the **Economy and Employment**. CE-S8 allows for small scale sites where these support local employment. The use of local materials is also beneficial for the local economy and can help to retain local character and distinctiveness which support tourism. CE-D5 relates to an existing permission, which is re-activated, would provide local employment and materials.
- 8.14.9. The provision for small scale extraction would also be positive for **Transport**, where this would reduce stone miles. Even with small scale extraction there will be some lorry movements, although these should be minimal as the intention is to provide a local source of materials. The policies deal with any impacts that might arise such as noise, dust and the implications of traffic generation.
- 8.14.10. There were no specific implications identified in relation to the SA topics of **Housing and Coast**.
- 8.14.11. **Recommendations for CE-S8 Small Scale Working or Re-working for Building and Roofing Stone; and CE-D5 Interim Development Orders**

Recommendations	Changes
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Add reference to geological interest in CE-S8 and CE-D5, cross refer to CE-S2 Biodiversity	Accepted
Add reference to opportunities for achieving conservation and enhancement of geodiversity, biodiversity, landscape character, historic environment and quiet enjoyment in CE-S8	Accepted

8.15. **CE-S9 Major Mineral Extraction**

- 8.15.1. Although there is a history of mineral working on Exmoor, there are no large scale mines or quarries in operation, and minerals assessments for Somerset and Devon indicate that there is no current requirement for them. Policy CE-S9 therefore sets out that large scale mineral extraction is not appropriate in the National Park.
- 8.15.2. The policy is positive in relation to **Climate Change Mitigation and Energy**, as the hierarchical approach set out in the NPPF and referenced in the supporting text is to first reduce the quantity of material used and waste generated; then use as much recycled and secondary material as possible, before finally securing the remainder of material needed through new primary extraction. This will contribute to climate change mitigation through reducing emissions.
- 8.15.3. The policy is also positive for **Community and Wellbeing** as it states that major mineral extraction is not likely to be appropriate in the National Park, which will be beneficial for communities as it will avoid impacts such as noise, dust, pollution and so on.
- 8.15.4. The policy does not allow major extraction other than in exceptional circumstances which will safeguard **Land** and **Landscape**. The policies require restoration of land after extraction ceases.
- 8.15.5. The restriction of large scale minerals extraction is positive for **Transport**, as this avoids significant lorry movements, with associated impacts such as emissions, noise and dust as well as potential impacts on the road infrastructure such as historic bridges.
- 8.15.6. A neutral score was given in relation to **Economy and Employment**. The policy does not allow major extraction other than in exceptional circumstances, which could be negative for the economy, as minerals have to be extracted where they are found. However the Local Aggregate Assessment for Devon and Somerset did not identify the need for major extraction on Exmoor based on its geology, so negative impacts on the economy are not anticipated.
- 8.15.7. A negative score was given in relation to **Air Quality and Water Resources**. The policy does not specifically refer to operational impacts such as noise, dust, impacts on groundwater, contamination, other than a general reference to the development being carried out to high environmental standards. Although the overall policy aim is to not allow major

mineral extraction within the National Park, if in exceptional circumstances this is allowed, there should be safeguards to ensure that operations do not cause adverse impacts.

8.15.8. A negative score was also given in relation to **Biodiversity and Green Infrastructure**, and **Historic Environment**. CE-S9 sets out that large scale mineral extraction is not appropriate in the National Park, but further explanation is needed in the text as to why that is justified, based on National Park purposes (including wildlife and cultural heritage) and the assessment that minerals do not need to be won within the National Park. Currently the text refers to the major impact of modern mineral extraction on the landscape, public enjoyment and local communities.

8.15.9. No specific implications were identified for the SA topics of **Climate Change and Adaptation to Flood Risk, Coast or Housing**.

8.15.10. **Recommendations for CE-S9 Major Mineral Extraction**

Recommendations	Changes
Amend CE-S9 Major mineral extraction to ensure that operations do not cause adverse impacts (similar to the tests in CE-S8 Small-scale Minerals Extraction) if, in exceptional circumstances, permission is granted	Accepted
CE-S9 sets out that large scale mineral extraction is not appropriate in the National Park, but further explanation is needed in the text as to why that is justified, based on National Park purposes (including wildlife and cultural heritage) and the assessment that minerals do not need to be won within the National Park	Accepted

9. Appraisal of Draft Local Plan Policies – Chapter 6 Responding to Climate Change

9.1. Overview

9.1.1. This Chapter covers the following Policies:

- **CC-S1 Climate Change Mitigation and Adaptation**
- **CC-D1 Flood Risk**
- **CC-D2 Coastal Development**
- **CC-S2 Responding to Coastal Change**
- **CC-D3 Water Conservation**
- **CC-S3 Low Carbon & Renewable Energy Development**
- **CC-D4 Small Scale Wind Turbines**
- **CC-D5 Freestanding Solar Arrays**
- **CC-S4 Waste Management**
- **CC-D6 Sewerage Capacity and Sewage Disposal**
- **CC-S5 Pollution**

9.1.2. A summary of the scores for these Policies is given in **Table 7** (please refer to the key for the scoring system at Table 1, page 8).

Table 7 – Summary scores for Draft Policies Chapter 6: Responding to Climate Change

SA topics	CC-S1	CC-D1	CC-D2 CC-S2	CC-D3	CC-S3	CC-D4	CC-D5	CC-S4	CC-D6	CC-S5
Air quality and water resources	+	+	+	++	++	+	+	+	+	++
Biodiversity and Green Infrastructure	+	+	+	++	++	+	+	+	+	+
Climate change and adaptation to flood risk	++	++	++	++	0	0	0	0	+	+
Climate change mitigation and energy	++	+	0	0	+	+/-	+/-	+	0	+
Community wellbeing	+	++	+	+	+/-	+/-	+/-	+	+	++
Economy and employment	+	+/-	+/-	+	+/-	+/-	+/-	+	0	+/-
Historic environment	+	0	+	+	++	+	+	+	0	0

SA topics	CC-S1	CC-D1	CC-D2 CC-S2	CC-D3	CC-S3	CC-D4	CC-D5	CC-S4	CC-D6	CC-S5
Housing	+	+/-	+	+	+	+	+	0	+	0
									-	
Land	+	+/-	+	+	+	0	0	++	+	++
Landscape	+	+	+	0	++	++	++	+	+	+
Coast	+	++	++	0	0	+	+	0	+	+
										0
Transport	+	0	+	0	+	+	0	+	0	+

Split cells indicate where scores have changed as a result of the SA, the bottom cell shows the original score, and the top cell shows the score following the SA

9.2. Overall assessment of Draft Policies Chapter 6 Responding to Climate Change

- 9.2.1. This chapter sets out the policy approach to responding to climate change through planning and development, both in terms of adaptation to the changes in climate that are already occurring, and climate change mitigation through reducing emissions of greenhouse gases by encouraging carbon storage (for example in peatlands) and reducing the demands for energy.
- 9.2.2. Overall, the policies are positive in relation to the natural and built environment, through recognising the implications of climate change on the landscape, wildlife and historic environment, and seeking to enable these to adapt, and build resilience to future changes. There are also safeguards to protect natural resources, particularly through the avoidance of pollution, water conservation, and management of waste and sewerage.
- 9.2.3. A number of the policies are strongly positive in relation to Climate Change Adaptation and Flood Risk, as would be expected as they are aimed at addressing these issues. The policies seek to avoid inappropriate development in areas at risk of flooding by directing development away from areas at highest risk or, where development is necessary, making it safe without increasing flood risk elsewhere. Risks from sea level rise and coastal change are a concern for coastal communities, particularly in Porlock Weir, and the policies address this by avoiding inappropriate development in vulnerable areas or enabling a planned response to coastal change.
- 9.2.4. The policies are also mainly positive in relation to Climate Change Mitigation, as they are designed to address these issues. There are specific policies aimed at reducing emissions of greenhouse gases, through reducing energy demands, encouraging energy efficiency, promoting sustainable transport and renewable energy. However, due to potential

impacts on National Park purposes, particularly visual impacts and effects on landscape character and the historic built environment, the scale of renewable energy schemes is limited, meaning that the potential contribution to climate change mitigation is less than it could be.

- 9.2.5. There are both positive and negative implications for local communities and the economy. The policies recognise the need for local communities and businesses to adapt to changes in climate, including responding to flood risk and coastal change, and build resilience to future changes. There are both costs and potential benefits from this, for example new business opportunities and local jobs arising from suppliers and installers of renewable energy technologies, although these will be tempered by the limitations of the scale of renewable energy that is considered appropriate in the National Park. CC-S3 supports proposals that meet business energy needs.
- 9.2.6. The following sections set out the SA assessments for each policy in more detail, including recommendations made by the SA to strengthen the draft policies, and how these have been taken on board in the draft Local Plan.

9.3. **CC-S1 Climate Change Mitigation and Adaptation**

- 9.3.1. This policy explains the response to climate change, both in terms of mitigating climate change through reducing greenhouse gas emissions, and building resilience by adapting to changes in climate that are already happening. The policy seeks to reduce greenhouse gas emissions and contribute to mitigating climate change including through promoting the energy hierarchy, small scale renewable energy technologies, water conservation, sustainable travel, and carbon storage and sequestration. It also supports measures to adapt to climate change including avoiding development in areas of flood risk and promoting land management that reduces flood risk, adapting to coastal change, and enabling wildlife and heritage assets to adapt.
- 9.3.2. CC-S1 is strongly positive in relation to the SA topics of and **Climate Change and Adaptation to Flood Risk** and **Climate Change Mitigation and Energy** as it is specifically designed to address these issues.
- 9.3.3. CC-S1 is also positive in relation to the remaining SA topics. The policy recognises the potential impacts of climate change on **Biodiversity and Green Infrastructure**, and seeks to enable measures that allow wildlife and habitats to adapt. It could be strengthened by reference to green infrastructure networks, which are one way in which resilience amongst wildlife can be built up. The policy also recognises the potential impacts of climate change on **Landscape**, and seeks to enable measures that would strengthen landscape character. Similarly, the policy recognises the potential impacts of climate change on **Historic Environment**, and seeks to enable measures that allow heritage assets to adapt, providing these changes do not cause damaging alterations.
- 9.3.4. CC-S1 recognises the issues of sea level rise and the vulnerability of **coastal** communities, habitats and heritage assets. The policy includes measures to adapt to coastal change and references policy CC-S2 coastal change. The policy supports **Community and Wellbeing**

through including measures to enable adaptation to flood risk, increase resilience, and promote renewable energy. In relation to **Housing**, the policy includes measures to support the energy hierarchy and promote water efficiency.

9.3.5. The potential impacts of climate change on the **Economy and Employment**, are recognised both in terms of negative impacts (for example the cost of flooding), and new business opportunities, for example through the uptake of renewable energy technologies. **Transport** is a major contributor to emissions on Exmoor. The policy includes measures to reduce the need to travel and support sustainable transport modes, linking to policies in Chapter 10.

9.3.6. CC-S1 identifies that the main sources of greenhouse gas emissions on Exmoor are from **Land** management including agricultural activity, land use change and forestry. It recognises the importance of land management to reduce flood risk and to sequester and store carbon. This is likely to also support soil quality and avoid erosion. CC-S1 is positive in relation to **Air Quality and Water Resources** as it seeks to reduce greenhouse gas emissions and contribute to mitigating climate change. It promotes the energy hierarchy including through using low carbon and renewable energy, which will also improve air quality.

9.3.7. **Recommendations for CC-S1 – Climate Change Mitigation and Adaptation**

Recommendations	Changes
Amend CC-S1 climate change adaptation point iv to read <i>‘enabling wildlife and habitats to adapt to climate change including through enhancement of green infrastructure networks, and seeking opportunities to strengthen landscape character (CE-S1, CE-S2).</i>	Accepted

9.4. **CC-D1 Flood Risk**

9.4.1. CC-D1 sets out the approach to managing flood risk, taking into account the implications of climate change. The policy seeks to avoid inappropriate development in areas at risk of flooding by directing development away from areas at highest risk or, where development is necessary, making it safe without increasing flood risk elsewhere. Risks from coastal change should be reduced by avoiding inappropriate development in vulnerable areas or adding to the impacts of physical changes to the coast.

9.4.2. CC-D1 was strongly positive for **Climate Change and Adaptation to Flood Risk** as the policy is aimed at managing flood risk. It identifies flood risk zones and applies the sequential test and exceptions test to avoid development in flood risk areas. Similarly, the policy recognises the risk of flooding at the **Coast**, and allows for relocation of vulnerable communities and facilities. It also requires that proposals are compatible with the Shoreline Management Plan (SMP), and reflects the approach to coastal change in SMP2

including natural coastal evolution along the Porlock shingle ridge. CC-D1 was also strongly positive for **Community and Wellbeing** as it seeks to protect communities from flood risk and to allow vulnerable communities or facilities to be relocated. It also requires proposals not to increase the risk of flooding elsewhere. The text refers to flood watch areas which provide an early flood-warning system for communities at risk.

- 9.4.3. CC-D1 scored positively for **Biodiversity and Green Infrastructure**. The policy encourages the management of flood risk through working with natural processes, conserving the natural environment and cultural heritage. It also requires that proposals do not reduce the potential of land for current or future flood management, which would include flood meadows. The text supports good rural land management which includes creating new woodland and retaining water on lowland flood meadows. The text also reflects the approach of no active intervention at Porlock Weir, allowing natural coastal evolution which will create new habitats. It was also considered to be positive for **Landscape**, since although the policy does not directly address landscape issues, the support for natural processes and good rural land management (e.g. new woodland) will also be positive for landscape.
- 9.4.4. CC-D1 also scored positively for **Climate Change Mitigation and Energy and Air Quality and Water Resources**. The policy includes the incorporation of sustainable drainage systems to minimise surface run off and avoid pollution.
- 9.4.5. There are likely to be both positive and negative implications in relation to **Economy and Employment**. The policy seeks to protect businesses from flood risk and to allow vulnerable businesses or facilities to be relocated. However, the restriction of development away from flood risk areas could limit some economic opportunities, for example tourism facilities. Similarly, the policy is positive in avoiding new **Housing** or change of use in areas of flood risk, and seeking to avoid increasing flood risk elsewhere. However, the policy is also a major constraint on housing provision in some settlements, given the scale of the flood zone / potential area of constraint, and the limited available sites for development. The policy encourages the management of flood risk through working with natural processes, conserving the natural environment and cultural heritage. It also requires that proposals do not reduce the potential of **Land** for current or future flood management. The text supports good rural land management which includes creating new woodland and retaining water on lowland flood meadows. However, the re-use of brownfield land could be restricted if it was also within an area of flood risk.
- 9.4.6. A neutral score was given in relation to **Historic Environment**, as the implications of flood risk for heritage assets have been covered in CC-S1. Similarly, a neutral score was given to **Transport**, as flood risk issues are dealt with in Chapter 10 of the draft Local Plan. However, there should be a cross-reference to the relevant part of Chapter 10 in the text.

9.4.7. **Recommendations for CC-D1 Flood Risk**

Recommendations	Changes
Include reference in the text to flood risk in relation to transport infrastructure, and cross-refer to Chapter 10 Achieving Accessibility for All	Accepted

9.5. **CC-D2 Coastal Development and CC-S2 Responding to Coastal Change**

- 9.5.1. CC-D2 recognises the importance and value of the coast, in landscape, wildlife and heritage terms, and in relation to the tourism economy. It seeks to avoid development on the coast unless it requires a coastal location, due to the physical vulnerability of coastal locations, and potential visual impacts. The policies also recognise that effective policies are required to prepare for and adjust to the impacts of climate change on the coast. Policy CC-S2 relates specifically to communities that are at risk of coastal change, and enables adaptation measures or relocation of existing buildings and facilities that may be lost or rendered unusable due to coastal change.
- 9.5.2. CC-D2 and CC-S2 policy scored strongly positive in relation to **Climate Change and Adaptation to Flood Risk**, as the policies are designed specifically to address these issues. CC-D2 is aimed at responding to climate change in relation to coastal change. It seeks to ensure that new development does not take place in areas at risk of coastal change (unless it is essential infrastructure or sea defences). Policy CC-S2 is specifically about adaptation and relocation in response to coastal change. Similarly, the policies scored strongly positive in relation to the **Coast**, as they are aimed at responding to the potential effects of coastal change, and protecting vulnerable communities by allowing for relocation, and directing development away from coastal areas at risk.
- 9.5.3. The policies scored positively for **Biodiversity and Green Infrastructure** The text recognises the importance of the coast for a range of habitats and species including a number of designations, and cross-refers to CE-S2 Biodiversity. It seeks to protect the undeveloped nature of the coast, which will benefit biodiversity. Policy CC-S2 requires the development to not impact on biodiversity. Similarly, in relation to **Historic Environment**, the text recognises the importance of the coast for a range of heritage assets including a number of designations, and cross-refers to CE-S4 Cultural Heritage. It also highlights the potential loss of archaeological features from coastal change. Policy CC-S2 requires the relocation of development at risk to not impact on the built environment or townscape. CC-D2 does not explicitly refer to the protection of biodiversity or cultural heritage.
- 9.5.4. The policies also scored positively for **Landscape**. They include a number safeguards to ensure that removal of existing buildings or facilities at risk and their relocation does not detract from the landscape (Policy CC-D2 point (iii), Policy CC-S2 points (iii), (iv), (v), (vi). Opportunities for enhancement are also promoted CC-S2 point (iv).

- 9.5.5. The policies scored positively for **Community and Wellbeing** as they allow for relocation of communities at risk of coastal change. CC-S2 specifically identifies the need for a strategy for Porlock Weir and surrounding area. The text also reflects the SMP approach to ‘hold the line’ at Lynmouth. In relation to **Housing**, the policy allows for relocation of current housing that may be at risk of coastal change, including some flexibility over the size of the replacement dwelling, to accommodate modern requirements. This also has implications for the SA topic of **Land**, as CC-S2 requires the site of the original development at risk to be cleared and reinstated to the benefit of the local environment, consistent with National Park purposes. This could be strengthened to also enable the site to benefit the local community. The policy requires the relocated development to be in a location well related to existing buildings or infrastructure, with a preference to it being located in associated existing identified settlements, which will promote sustainable use of land.
- 9.5.6. The policies scored positively for **Air Quality and Water Resources**. The text requires proposals to not result in coastal water pollution, and cross-refers to CC-S5 pollution. The text highlights the need to minimise the traffic impacts of new development particularly seasonal traffic on narrow roads that lead to the, which will indirectly benefit air quality. This is also positive in relation to the SA topic of **Transport**. Policy CC-D2 also supports these objectives, by requiring that development should not be provided at the coast unless it requires a coastal location. Transport infrastructure may be at risk due to coastal change, and the text refers to the relocation of development and infrastructure due to coastal change, however the policy does not refer to infrastructure specifically. There may be roads or other infrastructure at risk from coastal change, for example at Porlock Weir.
- 9.5.7. There were both positive and negative implications for the SA topic of **Economy and Employment**. The policy is positive in seeking to allow for relocation of facilities and businesses at risk of coastal change. However, in accordance with policy CC-D2 development must require a coastal location (for example in relation to the marine sector, coastal tourism and so on), yet businesses in the named settlements on the coast will include a much wider range of sectors, some of which may not require a coastal location.
- 9.5.8. The policies were considered to be neutral in relation to the SA topic **Climate Change Mitigation and Energy**, as they are primarily about climate change adaptation, and do not specifically address climate change mitigation, although the text refers to the management of traffic, which will indirectly reduce emissions.
- 9.5.9. **Recommendations for CC-D2 Coastal development and CC-S2 Responding to Coastal Change**

Recommendations	Changes
Amend CC-D2 point (c) to read ‘and does not adversely affect coastal biodiversity and heritage assets’	Accepted
Amend CC-S2 point (e) to read ‘The site of	Accepted

the original development at risk it replaces is either cleared or managed to be rendered safe with benefit for the local <i>community or environment, and consistent with National Park purposes</i>	
Amend Policy CC-S2 to include relocation of infrastructure at risk. There should also be cross-reference to AC-S1 (sustainable transport) and CC-S1 (climate change)	Accepted
Amend the text of policy CC-D2 (i) to read ' <i>is located in a named settlement or requires a coastal location</i> '	Accepted

9.6. **CC-D3 Water Conservation**

- 9.6.1. The National Park is an important source of water for communities both within and outside the National Park. The catchments on Exmoor supply drinking water to over half a million people including in Tiverton, Exeter and Taunton. Growth in settlements outside the National Park could increase demands for water from Exmoor and emphasise the importance of water conservation. The National Park's popularity as a tourist destination, along with many other parts of the South West, also increases demand for water supplies, particularly during the summer months. Careful management and protection of these water catchments is important to ensure that their ability to provide ecosystem services including capturing and storing rainfall, managing flood risk, water cycling, the supply of clean, fresh water, and support for wildlife habitats and species are not compromised.
- 9.6.2. CC-D3 scored strongly positive for **Air Quality and Water Resources, Biodiversity and Green Infrastructure, and Climate Change and Adaptation to Flood Risk**. The policy is intended to support the conservation of water resources, recognising the multiple benefits and 'ecosystem services' provided by water catchments on Exmoor. These benefits include the supply of clean drinking water, flood attenuation and biodiversity. The supporting text identifies the importance of water for biodiversity, both in terms of water quality and quantity to support water dependent species and wetland habitats. It also refers to water resource management plans which water companies are required to prepare to assess long term water demands and the availability of water for this. These plans have to take account of climate change implications e.g. implications of hotter drier summers. CC-D3 requires proposals to incorporate water conservation measures including minimising demand, recycling and storing water, and retrofit where appropriate. It also supports on-farm water storage, bearing in mind climate change and the likely future demands for water. Proposals which could adversely affect fisheries, recreational or nature conservation interests will not be supported.
- 9.6.3. CC-D3 scored positively for **Community and Wellbeing, and Economy and Employment**. The policy aims to support the supply of clean, fresh water to local communities as well as providing other benefits such as managing flood risk. It covers public and private water supplies. Exmoor provides water for local businesses, although there are not any major

industries which have heavy water demands. There are seasonal peaks in water demand due to the tourism industry, which is taken account of in water company water resource management plans. Water supplies are also important for agriculture – this could be referenced in the supporting text. CC-D3 requires proposals to incorporate water conservation measures including minimising demand, recycling and storing water, and retrofit where appropriate. Proposals which could adversely affect existing supplies or recreational interests will not be supported.

- 9.6.4. CC-D3 also scored positively for **Historic Environment**, and **Housing**. CC-D3 requires proposals to incorporate water conservation measures including minimising demand, recycling and storing water, and retrofit where appropriate. Retrofitting on listed buildings would require listed building consent, and on traditional buildings would need to not cause harm to the historic fabric of the building. This should be included in the supporting text.
- 9.6.5. CC-D3 scored positively for **Land**. The policy highlights the water catchments on Exmoor and their role in capturing and storing rainfall. The supporting text highlights the emphasis on conserving water resources on Exmoor including managing water on a catchment basis.
- 9.6.6. No specific implications were identified for the remaining topics of **Landscape, Climate Change Mitigation and Energy, Coast and Transport**.
- 9.6.7. **Recommendations for CC-D3 Water Conservation**

Recommendations	Changes
Highlight in supporting text that water resource management plans have taken account of climate change implications in the assessment of long term water availability	Accepted
Amend supporting text to include reference to local businesses including agriculture	Accepted
Add reference in the supporting text to retrofitting on listed buildings requiring listed building consent, and on traditional buildings ensuring this does not cause harm to the historic fabric of the building	Accepted

9.7. **CC-S3 Low Carbon and Renewable Energy Development**

- 9.7.1. CC-S3 sets out in more detail the specific approach to renewable energy within the National Park. The Policy highlights National Park Authorities’ role as exemplars of sustainability in responding to climate change, including promoting energy efficiency and the generation of renewable energy, whilst not compromising their overriding duty under

the 1949 Act. It recognises that the National Parks offer important opportunities for a range of renewable energy technologies, including biomass (woodfuels), micro-hydro, anaerobic digestion (which will also reduce waste), wind and solar power installations, and that the use of renewable technologies on Exmoor has been encouraged through the Carbon Neutral Exmoor programme. However, it seeks to balance an overall positive approach to renewables with the national value of the landscape, and potential impacts on its special qualities including wildlife and cultural heritage.

- 9.7.2. CC-S3 is strongly positive for **Air Quality and Water Resources**, as it aims to promote low carbon development and the use of renewable energy, which will reduce emissions of greenhouse gasses and improve air quality. The consideration of potential impacts covers air and water quality, including potential impacts on air quality from biomass and the impacts of hydro schemes on water quality and resources. The policy requires that any proposals conserve the amenity of the area including air and water quality.
- 9.7.3. CC-S3 is strongly positive for **Biodiversity and Green Infrastructure**. The supporting text states that proposals likely to have an adverse effect on designated wildlife sites will not be granted, and that careful consideration should also be given to Local Wildlife Sites. The supporting text cross-refers to CE-S2 on biodiversity and states that proposals may require ecological surveys or EIAs. The potential impacts on wildlife are set out. The policy requires that proposals do not compromise the wildlife of the National Park and promotes environmental enhancement which could include biodiversity enhancements.
- 9.7.4. CC-S3 is strongly positive for **Historic Environment**. The supporting text refers to the protection of designated heritage assets and consideration of potential impacts on cultural heritage is required. It advises that archaeological or historic environment surveys or investigations may be required. The policy requires that proposals do not compromise the cultural heritage of the National Park and promotes environmental enhancement which could include heritage assets.
- 9.7.5. CC-S3 is strongly positive for **Landscape**. The potential landscape, tranquillity and visual impacts of renewable energy schemes are set out. The policy requires proposals to be compatible with the landscape character and avoid the most sensitive landscapes; to not compromise the natural beauty of the National Park; promotes environmental enhancement; conserves the amenity of the area including landscape and tranquillity; and requires reinstatement of the site once the use has ended. There is also reference to impacts on the National Park and its setting.
- 9.7.6. CC-S3 scored positively for **Climate Change Mitigation and Energy** as the policy is aimed at mitigating climate change through promoting renewable energy. However, the policy does not set any targets for Renewable Energy generation or local standards for incorporating renewable energy technologies within developments, which is why the policy is scored as positive rather than strongly positive.
- 9.7.7. CC-S3 scored positively for **Housing** as it supports sustainable housing through the promotion of renewable energy technologies which will provide alternative sources of electricity and heat for households and potentially help address fuel poverty, particularly

with the rising costs of fossil fuels. CC-S3 also scored positively for **Land** as most proposals will either be associated with existing buildings (e.g. Anaerobic Digestion or biomass plants on farms, or domestic solar thermal and PV panels), or require minimal land take (e.g. wind turbines). However, there is no consideration of energy from waste renewable energy technologies, which could provide a sustainable way of managing residual municipal waste and agricultural wastes.

- 9.7.8. CC-S3 scored positively for **Transport**, with the potential impacts of renewable energy developments on recreation and access, and the transport and traffic implications of renewable energy schemes being included in the issues to be considered. CC-S3 requires proposals to conserve the amenity of the area including in relation to access and recreation and traffic generation.
- 9.7.9. There were considered to be both positive and negative implications for **Community and Wellbeing**. The policy and text highlight the potential community benefits from renewable energy schemes, and also cover potential impacts of noise, tranquillity and shadow flicker, which will benefit communities. The supporting text and CC-S3 promote environmental enhancement or community benefits wherever possible. However, the restrictions on potential renewable energy technologies particularly their size and scale due to the National Park purposes is likely to limit potential community schemes e.g. wind turbines which have to be of a certain size to be viable.
- 9.7.10. There were also considered to be both positive and negative implications for the **Economy and Employment**. The supporting text recognises the potential benefits for local jobs from suppliers and installers of renewable energy technologies. CC-S3 supports proposals that meet business energy needs. However, the text specifically excludes large and medium scale renewable energy projects as they are not compatible with National Park purposes, and the policy relates to small scale renewable energy proposals only. This could lead to opportunities for economic benefit and jobs being lost.
- 9.7.11. CC-S3 was considered to be neutral in relation to **Climate Change and Adaptation to Flood Risk**. The policy is primarily about climate change mitigation, and the policy and text do not specifically relate to climate change adaptation or flood risk. Any potential implications of development proposals in relation to flood risk would be covered by CC-D1 Flood Risk, but there could be cross-reference to this in the text.
- 9.7.12. CC-S3 was considered to be neutral in relation to the **Coast**. Any renewable energy proposals on the coast would need to be assessed in accordance with the policy, including impacts on landscape, wildlife, cultural heritage and so on. Impacts of marine renewable energy proposals such as offshore wind turbines on the setting of the National Park or views from it would not be covered by the planning system, although the National Park Authority may wish to comment on applications to the Crown Estate. The main implications from a planning perspective are likely to be the impacts of any landfall grid connection from offshore schemes.
- 9.7.13. **Recommendations for CC-S3 Low Carbon and Renewable Energy Development**

Recommendations	Changes
The text should include reference to energy from waste and the opportunities and potential impacts of this	Accepted
Include a reference to the implications of flood risk and cross-reference to CC-D1	Accepted
The text should include reference to the potential implications of grid connection landfall for any offshore renewable energy schemes, and cross-refer to AC-S4 communications networks and AC-D5 electronic transmission infrastructure	Accepted

9.8. **CC-D4 Small Scale Wind Turbines**

- 9.8.1. The renewable energy resource assessment identified a good wind resource for Exmoor. However, the Exmoor National Park Partnership Plan 2012-17¹² recognises that wind turbines can, individually and cumulatively, erode the unspoilt, uncluttered nature of the landscape and they can have a detrimental impact on tranquillity. The potential for exploiting the wind resource is likely to be limited by the need to ensure that turbines do not detract from the statutory purposes to conserve the natural beauty, wildlife and cultural heritage of the National Park. CC-D4 provides the criteria against which wind turbine applications will be assessed. It focuses on small scale wind turbines (up to a maximum of 20m to rotor tip), as larger turbines are considered to be inappropriate within the National Park. It may be possible for individual small scale wind turbines to be assimilated within some landscape types with good siting, screening and design. Other landscape types may be so sensitive that will not be appropriate to have any turbines.
- 9.8.2. CC-D4 scored strongly positive for **Landscape** as the policy is intended to ensure that the National Park purposes relating to natural beauty are not compromised by wind turbines. This is the main factor behind limiting wind turbines to a height of 20m or less, as such turbines can be assimilated into some landscapes particularly where they are associated with existing buildings or screened by trees for example. The supporting text states that some landscapes such as moor and heath are so sensitive to intrusive development from vertical structures due to their open vistas and wild character that it may not be acceptable to have any turbines. The criteria in the policy include an assessment of cumulative impacts and aim to ensure that there is no unacceptable landscape or visual impact resulting from the development.
- 9.8.3. CC-D4 scored positively for the **Coast**. Although the coast is not specifically referenced, any RE proposals on the coast would need to be assessed in accordance with the policy, including impacts on landscape. Some coastal landscapes may be so sensitive to intrusive development from vertical structures that it may not be acceptable to have any turbines.

¹² Exmoor National Park Partnership Plan 2012-2017

- 9.8.4. CC-D4 scored positively for **Biodiversity and Green Infrastructure**, and **Historic Environment** as the policy and text require that any potential impacts on wildlife or cultural heritage are assessed and information is provided to support the application.
- 9.8.5. A positive score was also given in relation to **Air Quality and Water Resources**, as renewable energy from wind turbines would reduce emissions of greenhouse gases, and this policy seeks to enable small scale wind turbines where these are acceptable in relation to National Park purposes. The policy does not specifically refer to impacts on air or water quality, although it is unlikely that individual wind turbines would have significant implications for these resources.
- 9.8.6. CC-D4 was also considered to be positive in supporting sustainable **Housing** through the promotion of renewable energy technologies which will provide alternative sources of electricity for households and potentially help address fuel poverty, particularly with the rising costs of fossil fuels.
- 9.8.7. CC-D4 scored positively for **Transport**. The implications of RE proposals for transport are identified and the supporting text requires proposals to assess impacts of the turbine along with any required infrastructure including road access during construction to ensure that access to the site can be provided without damage to rural roads or historic bridges. Potential impacts on the rights of way and access network are also considered including the effects of shadow flicker or noise from the wind turbines on access routes (e.g. bridleways or footpaths) which could detract from the enjoyment of National Park users.
- 9.8.8. In relation to **Climate Change Mitigation and Energy**, Policy CC-D4 was given a mixed score as there were both positive and negative implications. The policy is aimed at mitigating climate change through promoting renewable energy. However, the policy restricts proposals to small scale wind turbines under 20m, and the text states that large or medium scale turbines are not considered acceptable due to conflicts with National Park purposes and specifically impacts on landscape and visual amenity. This will significantly reduce the opportunities for the generation of renewable energy from wind, and therefore reduce the potential carbon savings.
- 9.8.9. A range of positive and negative implications were also identified for **Community and Wellbeing** and **Economy and Employment**. The policy could benefit smaller communities (including those in isolated hamlets) and local businesses as it allows for turbines that serve groups of properties (which could include residential, commercial or employment properties). The policy requires that there are no adverse impacts on amenity including effects of shadow flicker and noise on nearby properties, and that public safety is not compromised. The policy also requires that the location does not conflict with the use of the area for recreation and access. The potential implications for local communities and for recreation and access should be assessed. However, the restrictions on potential renewable energy technologies particularly their size and scale is likely to limit economic opportunities and would also exclude potential community schemes as wind turbines would have to be larger to be viable.

9.8.10. The policy is primarily about climate change mitigation and does not specifically relate to **Climate Change and Adaptation to Flood Risk**, so a neutral score was given. Similarly, a neutral score was given for **Land** as the small scale wind turbines require minimal land take.

9.8.11. **Recommendations for CC-D4 Small Scale Wind Turbines**

Recommendations	Changes
Add reference to coastal landscapes in the supporting text	Accepted
Amend the supporting text to require applications to assess the impacts of proposals on all assets listed under the <i>Issues</i> section, to ensure that any potential impacts on air and water quality (and other issues) are considered	Accepted

9.9. **CC-D5 Freestanding Solar Arrays**

9.9.1. Policy CC-D5 Freestanding Solar Arrays responds to the increasing number of applications that the National Park Authority is receiving for stand-alone or ground-mounted solar panels. This is partly due to the sensitivity of traditional buildings in the National Park to roof mounted panels. However, the size and scale of some proposals has caused concern over visual impacts, particularly if the panels are located in fields away from existing buildings. The Policy therefore sets out the criteria to guide the sorts of applications that would be acceptable within the National Park.

9.9.2. CC-D5 scored strongly positive for **Landscape** as the policy is intended to ensure that the National Park purposes relating to natural beauty are not compromised by the potential visual impacts of stand alone solar arrays. Landscape and visual amenity is the main factor behind considering ground mounted arrays in preference to roof mounted ones. However, the Policy states that freestanding solar arrays would need to be appropriate in scale and in proportion with the property; suitably sited and screened to avoid intrusive visual or landscape impact; and the design, colour and choice of materials minimises any visual impact, Ground mounted arrays sited in isolation from existing built form will not be permitted due to landscape and visual impacts.

9.9.3. CC-D5 scored positively for the SA topics of **Air Quality and Water Resources**, and **Biodiversity and Green Infrastructure**. Renewable energy from solar arrays would reduce emissions of greenhouse gases, and this policy seeks to enable small scale solar arrays where these are acceptable in relation to National Park purposes. The policy requires proposals to avoid impacts on wildlife and land of high ecological interest and whilst it does not specifically refer to impacts on air or water quality, it is unlikely that solar arrays would have significant implications for these resources.

- 9.9.4. CC-D5 scored positively for **Historic Environment**. The policy recognises that in some cases it may be preferable to have ground mounted solar arrays rather than roof mounted panels, due to the sensitivity of some traditional buildings to roof mounted panels or their historic interest. The text sets out the expectation that proposals should not detract from architectural or historic interest, but does not cover archaeological interests. The policy does not cover protection of cultural heritage or historic environment.
- 9.9.5. CC-D5 scored positively for **Housing** as the promotion of renewable energy technologies will provide alternative sources of electricity for individual households and potentially help address fuel poverty, particularly with the rising costs of fossil fuels. Currently, the policy only refers to individual properties which would restrict solar arrays serving a group of properties such as groups of social housing where ground mounted panels are preferable to roof mounted ones for landscape or visual amenity reasons.
- 9.9.6. CC-D5 solar arrays scored positively for the **Coast**. Although the coast is not specifically referenced, any renewable energy proposals on the coast would need to be assessed in accordance with the policy, including impacts on landscape. Cross- reference should be made in the text to the types of impact to be assessed as set out in the earlier text.
- 9.9.7. In relation to **Climate Change Mitigation and Energy**, Policy CC-D4 Small-Scale Wind Turbines was given a mixed score as there were both positive and negative implications. The policy is aimed at mitigating climate change through promoting renewable energy. However, the policy restricts proposals to small scale solar arrays due to conflicts with National Park purposes and specifically impacts on landscape and visual amenity. This will significantly reduce the opportunities for the generation of renewable energy, and therefore reduce potential carbon savings.
- 9.9.8. There were positive and negative implications in relation to **Community and Wellbeing** and **Economy and Employment**. The policy relates to freestanding solar arrays serving individual properties which could be residential, commercial or employment properties. This could include community buildings such as village halls although there is no reference to this. However, the restrictions on size and scale could limit potential community schemes and affect their viability as well as constraining economic opportunities. The potential implications for local communities including jobs should be assessed.
- 9.9.9. CC-D5 was considered to be neutral in relation to **Land**. There will be some land-take, but the policy is mainly restricted to small scale arrays, (although the supporting text does refer to some circumstances where larger scale arrays may be acceptable). In some circumstances it may be possible to still use the land for agricultural use, for example grazing for sheep.
- 9.9.10. There are unlikely to be any implications relating to **Transport**, however proposals should be assessed against the issues listed including any transport impacts for example transporting materials and equipment to the site.
- 9.9.11. There were not considered to be any specific issues relating to **Climate Change and Adaptation to Flood Risk** as the policy is primarily about climate change mitigation. Any

potential implications of development proposals in relation to flood risk would be covered by CC-D1 flood risk, but there could be cross-reference to this.

9.9.12. **Recommendations for CC-D5 Freestanding Solar Arrays**

Recommendations	Changes
The text should be amended to require applications to assess the impacts of proposals on all Issues listed under the supporting text for CC-S3. This would cover air and water quality, biodiversity, cultural heritage, the coast, local communities and transport	Accepted
Amend supporting text to read ‘...and do not detract from any architectural, historic or archaeological interest. Add point to Policy CC-D5 solar arrays ‘do not detract from the setting of listed buildings or other heritage assets, or cause damage to archaeological interests’	Accepted
Amend Policy CC-D5 solar arrays to read ‘ Small scale freestanding solar arrays to serve the needs of individual properties or groups of properties will be permitted where... ’	Accepted
Amend supporting text to refer to community buildings such as village halls	Accepted
Include cross-reference in text to CC-D1 flood risk	Accepted

9.10. **CC-S4 Waste Management**

9.10.1. Policy CC-S4 sets out the planning policy for waste management including anaerobic digestion.

9.10.2. The policy was considered to be strongly positive in relation to the SA topic of **Land**, as large scale waste facilities will not be permitted, which will safeguard land. The policy also applies the waste hierarchy which will also reduce land-take as it seeks to reduce the generation of waste in the first instance, and consider reuse, recycling or recovery before disposal is considered as the last resort. Proposals for small scale reuse, recycling and anaerobic digesters dealing with a mixed waste stream will be permitted but only to serve the needs of the local community or farm(s). Construction and demolition waste should be managed on site, unless there is a risk to the environment or communities, when off-site disposal will be permitted.

- 9.10.3. The policy was considered to be positive for **Air and Water Quality, Landscape and Biodiversity and Green Infrastructure**. Large scale waste facilities will not be permitted, which will safeguard air and water quality, landscape and wildlife. Construction and demolition waste should be managed on site, unless there is a risk to the water environment or wildlife, when off-site disposal will be permitted. Agricultural waste including manure and slurry can be a pollution risk and are also odorous, but reference is made to CC-S5 Pollution in the text. Appropriate restoration and after-use of sites is required to achieve National Park purposes, but it is not specified how. Restoration could provide benefits for landscape character, biodiversity and green infrastructure.
- 9.10.4. The policy approach follows the national waste hierarchy which will contribute to **Climate Change Mitigation** and reduce energy. Anaerobic digestion is a source of low carbon energy, and provided there is not a lot of additional waste being transported in, this will also contribute to climate change mitigation.
- 9.10.5. CC-S4 is also positive for **Community Wellbeing and Economy and Employment**. The role of local communities in applying the waste hierarchy is recognised, and large scale waste facilities will not be permitted, which will avoid significant impacts on local communities and will not detract from the qualities that encourage tourism. There is no adverse impact on the economy as waste is dealt with outside the National Park. Proposals for small scale reuse, recycling and anaerobic digesters dealing with a mixed waste stream will be permitted to serve the needs of the local community or farm businesses.
- 9.10.6. The policy is positive for **Transport** as no importation of waste is allowed. Allowance for small scale facilities to serve local community or farm needs will reduce the need to travel. Design of new development should take into account access requirements for waste operators.
- 9.10.7. A neutral score was given for the **Historic Environment**. Overall, heritage assets will be safeguarded by the policy, particularly as large scale waste facilities will not be permitted. However the requirement that construction and demolition waste should be managed on site could potentially be damaging to the historic or built environment or its setting.
- 9.10.8. No specific implications were identified for the SA topics of **Climate Change and Adaptation to Flood Risk, Coast or Housing**.

9.10.9. **Recommendations for CC-S4 Waste Management**

Recommendations	Changes
Amend CC-S4 to set out where small scale	Accepted

community facilities should be provided to avoid adverse impacts on landscape, wildlife and historic environment	
Cross-refer to the criteria in CC-S3 Low Carbon and Renewable Energy Development to guide location of anaerobic digester proposals dealing with a mixed waste stream to avoid impacts on the natural and historic environment, and traffic generation	Accepted
Appropriate restoration and after use of sites is required to achieve National Park purposes, but it is not specified how. Restoration could provide benefits for landscape character, biodiversity and green infrastructure	Accepted
Add specific requirements for restoration of sites along the lines of CE-S8 (10)	Accepted
Amend the clause in the policy relating construction and demolition waste to include impacts on the historic environment (such as archaeology) or setting of a heritage asset	Accepted

9.11. **CC-D6 Sewerage Capacity and Sewage Disposal**

- 9.11.1. Policy CC-D6 Sewerage Capacity and Sewage Disposal addresses requirements for sewerage capacity and sewage disposal within the National Park. It seeks to avoid negative impacts on the environmental quality of land, air and water; public health and amenity; and to provide appropriately for new or extended sewage infrastructure.
- 9.11.2. CC-D6 scored positively in relation to **Air Quality and Water Resources** as the policy is intended to manage sewage disposal and sewerage capacity to ensure that the environmental quality of air and water are not exceeded. It also scored positively for **Climate Change and Adaptation to Flood Risk**. CC-D6 states that development will be permitted where it can be demonstrated that the facility will pose no unacceptable harm to environmental quality (including air, water and land). Environmental impacts such as emissions and discharges are controlled under other legislation. CC-D6 requires that proposals include the use of necessary mitigation measures to avoid impacts on surrounding areas including air and water pollution. However, many households are served by septic tanks, which can be the cause of local pollution incidents. There are also risks of pollution from septic tanks in areas where there is a high water table or if the site is susceptible to flooding. The supporting text highlights that climate change impacts could include increased risks of flooding, causing pollution from overflow from non-mains drainage and highlighting that flood resilience measures to avoid overflows are required. The supporting text identifies that sewage treatment plants are classified as ‘less vulnerable’ development in areas of flood risk. Therefore provided adequate pollution

control measures are in place, sewage transmission infrastructure such as pumping stations are seen as water compatible development (see CC-D1 Flood Risk). The impact on water quality is a key consideration for applications regarding sewerage works. The supporting text encourages the recycling and reuse of rainwater and greywater which helps to minimise risks of overloading sewerage works and cross-refers to CC-D3 Water Conservation.

- 9.11.3. CC-D6 scored positively for **Community and Wellbeing** as the policy provides for a community service – sewage disposal. It is intended to avoid detrimental impacts on public health and amenity including nuisances such as odour. The policy also prevents development such as housing near to sewage treatment works. The policy also scored positively for **Coast**, with reference to the risks of flooding and the need to incorporate climate change flood resilience measures to avoid overflows, which could help to improve bathing water quality at the coast.
- 9.11.4. CC-D6 also scored positively for **Land and Landscape**. The policy is intended to manage sewage disposal and sewerage capacity to ensure that detrimental impacts on amenity and the environmental quality of land are avoided through the appropriate treatment and disposal of sewage waste. CE-D1 states that development will be permitted where it can be demonstrated that the facility will pose no unacceptable harm to environmental quality (including air, water and land). CC-D6 requires the appropriate location, scale and design of facilities, and the use of necessary mitigation measures to avoid impacts on surrounding areas including soil. The explanatory text identifies that additional sewage facilities or the expansion of existing facilities may be required during the plan period, which could require land-take, but these are likely to be small scale due to the size of the population. The policy approach is to encourage efficient use of existing sewerage infrastructure, which reduce the need for land-take. The scale, siting and appearance of sewerage works are important to ensure that what may otherwise be intrusive development is acceptable in the National Park. The proliferation of small private sewage treatment plants should be avoided for reasons including landscape impact.
- 9.11.5. CC-D6 was given a neutral score for **Biodiversity and Green Infrastructure**. The management of sewage disposal is important to maintain water quality and aquatic species. Sewage pollution incidents can kill fish due to lack of oxygen in the water. The policy is aimed at protecting environmental quality including water quality, which will also benefit biodiversity – a direct reference to this should be added in the supporting text.
- 9.11.6. CC-D6 was given a negative score in relation to **Housing**, as the policy could potentially result in proposals for affordable housing being refused due to proposals only being permitted where the existing sewerage infrastructure has the capacity, or measures will be put in place, to cope with additional demands. Housing development in particular can increase the risk of water quality being affected due to extra loads being placed on sewerage works. The policy approach could be changed 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.

9.11.7. No specific implications were identified in relation to **Climate Change Mitigation and Energy; Economy and Employment; Historic Environment, and Transport.**

9.11.8. **Recommendations for CC-D6 Sewerage Capacity and Sewage Disposal**

Recommendations	Changes
Include climate change resilience for private sewage in CC-D6	Accepted
Include reference to the importance of water quality for biodiversity in the text	Accepted
Change the policy approach 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	Accepted

9.12. **CC-S5 Pollution**

9.12.1. Policy CC-S5 Pollution seeks to ensure that new and existing development does not contribute to pollution, and that it is not adversely affected or put at risk by unacceptable levels of pollution. It covers pollution to land, air, water or noise.

9.12.2. CC-S5 was strongly positive in relation to **Air Quality and Water Resources**. The supporting text sets out the context relating to air quality. There are no Air Quality Management Areas within the National Park and the text recognises that the small scale of development is unlikely to cause significant impacts on air quality, although there could be cumulative impacts arising from traffic and energy generation. Opportunities for sustainable transport measures and energy efficiency or renewable energy generation in development will therefore be important considerations. The supporting text also set out the context relating to water quality. It identifies the importance of clean water resources for drinking water supply, nature conservation, fisheries and amenity value. Diffuse pollution and point source pollution including from agricultural activities, sewage discharge, accidental spillage etc need to be avoided. Cross-reference is made to CC-D3 water conservation in relating to water resources, as low flows in rivers and lowering of water tables can result in higher concentrations of contaminants and therefore lead to poor water quality. Climate change can also exacerbate these problems through low rainfall or flooding. Reference is made to Groundwater Protection Zones, which are designated to prevent contamination of drinking water supplies by placing constraints on the types of development allowed within the zones, although this is not referenced in the policy. Proposals should avoid pollution where possible by using preventative measures and applicants are encouraged to discuss potential pollution risks at an early stage with the National Park Authority and Environment Agency as a key stakeholder. Where pollution cannot be avoided, proposals will need to demonstrate that there are no unacceptable adverse impacts either

individually or cumulatively on the environment. Proposals that improve the quality of the surrounding environment will be more favourably considered.

- 9.12.3. CC-S5 was strongly positive in relation to **Community and Wellbeing**. The purpose of the policy is to avoid pollution which can lead to detrimental impacts to quality of life and cause health issues. Pollution control aims to prevent pollution and ensuring that air and water quality meet standards that guard against impacts to human health. Air quality is important for human health and is generally good on Exmoor, with no Air Quality Management Areas identified, although ground level ozone levels can occasionally reach high levels which can be detrimental to human health, although this is mainly caused by atmospheric conditions and is not something that policy can control. Pollution can cause unpleasant odours which can impact on neighbouring properties. The impact of noise is a material consideration in determining planning applications and development generating intrusive noise would not be permitted where it would have a significant adverse impact on health, quality of life or amenity. Land contamination can impact on human health and proposals for development such as housing, schools, nurseries or allotments would need to take particular account of the type of contamination and the remediation required. CC-S5 requires contaminated land to be remediated before development proceeds. Exmoor's clean water resource is vital for drinking water supplies. The potential impacts on areas outside the National Park are identified – this could also reference local communities, and partnership working with neighbouring authorities is important.
- 9.12.4. CC-S5 was strongly positive in relation to **Land** as the policy covers land contamination and requires remediation before any development proceeds. Different types of contamination are identified and the supporting text recognises that a site specific approach to remediation will be necessary. Soil pollution can arise from different sources including agricultural activities and fuel storage. Mineral extraction and waste disposal can cause pollution both directly and indirectly (for example traffic) and impacts will need to demonstrate any pollution is kept to an acceptable level.
- 9.12.5. CC-S5 scored positively for **Biodiversity and Green Infrastructure**. The supporting text identifies that Exmoor's habitats and wildlife can be damaged by pollution and recognises the importance of good air quality for sensitive habitats including Exmoor's internationally important heathlands and oak woodlands, (although air pollution is mainly caused by pollution laden winds from areas outside the National Park). Contaminated land can lead to a number of issues including impacts on the natural environment where pollution affects ecosystems and wildlife populations. Clean water resources are also important for nature conservation, and Exmoor's river corridors provide important wildlife habitats. Good design can limit the impact of light pollution on nature conservation. Consideration of the impact of noise on Exmoor's special qualities and environment would need to cover wildlife impacts. Further information on the impact of pollution on Natura 2000 sites is provided by the Exmoor Habitat Regulations Assessment. CC-S5 seeks to avoid pollution through partnership working. Where this cannot be achieved, proposals will need to demonstrate that there are no unacceptable adverse impacts either individually or cumulatively on the environment, including biodiversity. Proposals that improve the quality of the surrounding environment will be more favourably considered.

- 9.12.6. CC-S5 was considered to be positive in relation to **Climate Change and Adaptation to Flood Risk** and **Climate Change Mitigation and Energy**. The supporting text identifies that flooding can precipitate pollution and proposals which may affect or be affected by flooding should be consistent with CC-D1 flood risk. The supporting text also highlights that climate change is likely to add to the issue of low water flows which can lead to poor water quality. Pollution can be reduced by the actions of individuals e.g. car sharing, using sustainable transport modes, which will also support climate change mitigation. Cross reference is made to other relevant policies including AC-D1 Transport and Accessibility Requirements for Development which seeks to reduce pollution through sustainable travel plans, and CC-S1 Climate Change Adaptation and Mitigation. Emissions of greenhouse gases from development is an issue not only locally but in a wider context, and identifies measures to improve air quality including energy efficiency measures in building design and construction and the use of low carbon renewable energy sources. Design considerations can help to minimise energy loss and thus carbon emissions as well as other environmental pollutants. The elimination of unnecessary artificial lighting can have other benefits of reducing carbon emissions.
- 9.12.7. CC-S5 was also positive for **Landscape**. The supporting text identifies that Exmoor's special qualities including tranquillity and dark night skies can be damaged by noise and light pollution. Pollution can be minimised by good design can limit the impact of light pollution and through the actions of individuals e.g. minimising artificial lighting. CC-S5 requires proposals to avoid pollution and where this cannot be achieved, to demonstrate that there are no unacceptable adverse impacts either individually or cumulatively on the environment, including landscape and tranquillity. Proposals that improve the quality of the surrounding environment will be more favourably considered.
- 9.12.8. CC-S5 scored positively for **Transport**. Air quality in particular can be impacted by emissions from traffic. Air quality is generally good in the National Park and the support text recognises that the small scale of development is unlikely to cause significant impacts on air quality, although there could be cumulative impacts arising from traffic and energy generation. Opportunities for sustainable transport measures will therefore be important considerations. The supporting text identifies additional pollution generated by road traffic and recognises that pollution can be reduced by the actions of individuals e.g. car sharing, using sustainable transport modes and through sustainable travel plans, cross referring to AC-S1 Sustainable Transport and AC-D1 Transport and Accessibility Requirements for Development. Where pollution cannot be avoided, proposals will need to demonstrate that there are no unacceptable adverse impacts either individually or cumulatively on the environment, which would include consideration of the cumulative impacts of emissions from traffic.
- 9.12.9. There are both positive and negative implications for **Economy and Employment**. The aim of the policy is to avoid pollution and impacts on environment and quality of life. The high environmental quality of the National Park is what attracts visitors, and so is important for the tourism and recreation sectors. However, restrictions on certain types of development which may include pollution risks could restrict economic and employment opportunities, for example around Groundwater Protection Zones or certain agricultural activities such as silage effluent, milk and slurry. The mitigation of noise pollution recognises that existing

businesses should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established.

9.12.10. A neutral score was given in relation to the **Coast**. Bathing water quality is affected by diffuse pollution and sewage and can be impacted by point source pollution incidents. The supporting text should recognise potential impacts of pollution on bathing water quality and cross-refer to CC-D6 Sewerage and sewage disposal.

9.12.11. There were not considered to be any relevant issues relating to the SA topics of **Historic Environment**, or **Housing**.

9.12.12. **Recommendations for CC-S5 Pollution**

Recommendations	Changes
Amend CC-S5 to read ‘ through working in partnership with appropriate authorities, organisations, local communities and applicants, proposals should <i>first seek to avoid pollution by using preventative measures including in groundwater Source Protection Zones.</i> ’	Accepted
Add reference to potential impacts of pollution on local communities as well as areas outside the National Park and alter CC-S5 to correspond with this to require no unacceptable impact on communities including areas outside the National Park	Accepted
Amend CC-S5 to include quality of life as one of the considerations that proposals must demonstrate there is no unacceptable impact on	Accepted
Add reference in the supporting text to the opportunities to reduce pollution through the use of sustainable drainage systems (which reduce run-off from roads and avoid concentration of pollutants) and link to CE-S7 Design	Accepted
The supporting text should recognise potential impacts of pollution on bathing water quality and cross-refer to CC-D6 Sewerage	Accepted

10. Appraisal of Draft Local Plan Policies – Chapter 7 Achieving a Thriving Community

10.1. Overview

10.1.1. This Chapter covers the following Policies:

- **HC-S1 Housing**
- **HC-S2 Housing Conservation and Enhancement**
- **HC-S3 Local Occupancy Criteria**
- **HC-S4 Financial Contributions for Affordable Housing**
- **HC-S5 Principal Residence Housing**
- **HC-D1 Conversions to Dwellings in Settlements**
- **HC-D2 New Build Dwellings in Settlements**
- **HC-D3 Specialist Housing for Exmoor's Communities**
- **HC-D4 Conversions to Dwellings in the Open Countryside**
- **HC-D5 New Build Dwellings in the Open Countryside**
- **HC-D6 Rural workers**
- **HC-D7 Succession Farming – Second Dwellings on Established Farms**
- **HC-D8 'Extended Family' Dwellings Criteria**
- **HC-D9 Residential Caravans**
- **HC-D10 Replacement of Rural Workers Occupancy Conditions**
- **HC-D11 Replacement of Holiday Occupancy Conditions and Extended Family Ties**
- **HC-D12 Sub-division of Existing Dwellings**
- **HC-D13 Residential Extensions**
- **HC-D14 Outbuildings**
- **HC-D15 Replacement Dwellings**
- **HC-S6 Travelling Communities**
- **HC-S7 Local Commercial Services and Community Facilities**
- **HC-D16 Local Commercial Service Provision**
- **HC-D17 Safeguarding Local Commercial Services and Community Facilities**
- **HC-D18 Important Visual Amenity Space**
- **HC-S8 Residential Institutions**

10.1.2. A summary of the scores for these Policies is given in **Table 8** (please refer to the key for the scoring system at Table 1, page 8).

Table 8 – Summary scores for Draft Policies Chapter 7: Achieving a Thriving Community

SA topics	HC-S1 HC-S2 HC-S3 HC-S4 HC-D11	HC-S5	HC-D1 HC-D2	HC-D3 HC-D8	HC-D4 HC-D5 HC-D6 HC-D7 HC-D9 HC-D10	HC-D12 HC-D13 HC-D14 HC-D15	HC-S6	HC-S7 HC-D16 HC-D17	HC-D18	HC-S8
Air quality and water resources	+	0	0	0	0	0	0 -	+	0	+/-
Biodiversity and Green Infrastructure	+	0	0	+	+	0	0	+	+	+ 0
Climate change and adaptation to flood risk	0	0	0	+ -	0	0	+ -	+ 0	0	+ 0
Climate change mitigation and energy	0	0	+	+/-	+	+	0	+	0	+/-
Community wellbeing	++	++	+	++	+	+	+	++	++ +	++
Economy and employment	+/-	+/-	+	+	+	0	+	++	+/-	+
Historic environment	++	0	+	+ -	+	+	0	+	+	+
Housing	++	++	++	++	+	+	+	0	-	++
Land	+	+/-	+/-	+/-	+	+	+	+	+	+
Landscape	+	+	+	+/-	+	+	+	+	++	+
Coast	0	0	+	0	0	0	0	0	0	0
Transport	+	+	+	+/-	0	+	0	+	0	+/-

Split cells indicate where scores have changed as a result of the SA, the bottom cell shows the original score, and the top cell shows the score following the SA

10.2. Overall Assessment of Draft Policies Chapter 7: Achieving a Thriving Community

10.2.1. Overall, it can be seen that the policies are generally positive or neutral in relation to the sustainability objectives. This suite of policies set out the policy approach to the provision of housing in the National Park. The housing policies aim to ensure that the housing needs

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

- 10.2.2. Exmoor has a significantly higher proportion of older people and this is likely to increase in future. As people grow older their housing needs often change and older people or those with disabilities may have specialist accommodation needs that are not met by the general housing stock. The Plan includes policies to allow for these needs to be accommodated, including HC-DC Specialist Housing and HC-D8 Extended Families.
- 10.2.3. The Plan aims to ensure that new build housing within the National Park meets a local community need for housing which in terms of size, type and affordability will help create more balanced, living and working communities with a better mix of houses. It seeks to give those in housing need, particularly local young people, the opportunity to stay in their community and help maintain the viability of important services such as schools. However, National Parks are not suitable locations for unrestricted housing development, and there is a limited number of greenfield housing sites that could be developed within the National Park's settlements without harm to landscape character as identified in the Landscape Sensitivity Study¹³. As a consequence, the policy approach is to maximise use of the existing stock of accommodation, buildings and previously developed land or buildings to reduce the level of greenfield housing development.
- 10.2.4. Given the limited number of suitable greenfield housing sites, the policy approach is not to allocate sites or set targets for housing. Provision has not been made for housing solely to meet open market demand. Instead the focus is on allowing local needs affordable housing, either through new build or conversions, with a limited element of market housing (with a principal residency tie) where this is needed to cross-subsidise local needs affordable housing. As the approach is needs led, there are unlikely to be significant numbers of new housing (either new build or conversions). As a consequence, the impact of housing development will need to be assessed on a site by site basis, although the sustainability appraisal has been able to give an overall assessment of the policy approach. These policies and their assessment need to be read in conjunction with policy GP4 Spatial Strategy set out in Chapter 4 of the draft Local Plan.
- 10.2.5. Focusing on local needs affordable housing will generally be positive for the sustainability objectives, particularly in relation to **Community and Wellbeing** and **Housing**, as this is where the need has been demonstrated, although there will be mixed on the **Economy and Employment** with some potential negative impacts due to the restrictions of open market housing, but also positive effects from enabling affordable housing for local workers. This policy approach is also positive for the sustainability objectives relating to **Landscape, Biodiversity and Green Infrastructure, Historic Environment, Land, Air Quality**

¹³ Landscape Sensitivity Study (2013) Paul Bryan for Exmoor National Park Authority

and Water Resources, particularly given the focus on reusing existing buildings, as this will reduce pressures on the environment. Emissions of greenhouse gases from housing and during construction will also be low, helping to contribute to **Climate Change Mitigation and Energy**.

10.2.6. The following sections set out the SA assessments for each policy in more detail, including recommendations made by the SA to strengthen the draft policies, and how these have been taken on board in the draft Local Plan.

10.3. **HC-S1 Housing; HC-S2 Housing Conservation and Enhancement; HC-S3 Local Occupancy Criteria; HC-S4 Financial Contributions; and HC-D11 Replacement of Holiday Occupancy Conditions and Extended Family Ties**

10.3.1. HC-S1 Housing sets out the criteria for allowing local needs housing. HC-S2 Housing Conservation and Enhancement sets out the circumstances in which new housing will be allowed to enable the conservation or enhancement of existing listed buildings or an unattractive site within a settlement. This should be to provide affordable housing but where this is not financially viable, or would provide more affordable housing than is needed in the parish, a financial contribution will be sought to enable provision of affordable housing elsewhere in the National Park. HC-S3 sets out the criteria for determining local occupancy for the affordable housing provided. HC-S4 sets out the circumstances in which financial contributions will be required to enable provision of affordable housing elsewhere in the National Park. HC-D11 Replacement of Holiday Occupancy Conditions and Extended Family Ties enables flexibility for holiday lets or existing extended family dwellings to change occupancy to either type of occupancy or to a local need affordable home.

10.3.2. The policies score strongly positive in relation to **Community and Wellbeing** and **Housing**. The policies are aimed at supporting thriving and inclusive communities, and are specifically designed to address the housing needs of local communities. Evidence shows that the housing needs are for smaller units with affordable rents, particularly for younger people and families and an ageing population. Provision is made to support housing for people with local connection, local workers, specialist housing for older people and other vulnerable members of the community, and extended family dwellings. The policy on financial contributions for affordable housing where this cannot be provided onsite will help to ensure that affordable housing needs are still met. The policies also aim to ensure that housing makes good use of existing land and buildings, which will also make use of embodied energy. The approach is to particularly encourage smaller units that are affordable due to the evidence which demonstrates that larger sized units are unaffordable for many local people.

10.3.3. The policies also scored strongly positive for **Historic Environment**. Ensuring that the overall provision of housing meets local needs is likely to be positive for historic environment and settlement character as there will be less change and new development. Enabling reuse of existing buildings will be positive in helping to establish a viable use for some buildings and bring them back into use and management. The policies also provide flexibility to allow some listed buildings to be converted for housing where alternative

solutions are not available in order to achieve the conservation of the building, including to be allowed as market (principal residence) housing with a financial contribution towards affordable housing elsewhere in the National Park.

- 10.3.4. The policies were positive in relation to **Air Quality and Water Resources and Transport**. There are likely to be limited effects on air or water quality arising from housing. Any potential issues related to water or air quality would be addressed through policies CC-S5 Pollution, CC-D6 Sewerage. Policy CE-S7 Design will also support measures such as water efficiency. Restricting housing development will reduce the number of people who come to the National Park compared to meeting demand, which would be likely to lead to significant in-migration and therefore additional travel movements and traffic. Provision of housing for local workers and carers could help to reduce the need to travel by providing housing close to the place of work or care.
- 10.3.5. The policies were positive in relation to **Biodiversity and Green Infrastructure, Landscape, and Land**. The overall policy approach will limit the number of new houses so will place fewer pressures on these assets. The policies support reuse of existing buildings which will also reduce demand for greenfield sites. The landscape sensitivity study showed that there were limited numbers of dwellings that could be accommodated without detriment to the National Park's landscape. Any potential impacts will be covered by other policies in the Plan.
- 10.3.6. A neutral score was given in relation to SA topics relating to **Climate Change Mitigation and Adaptation**. The limited amount of new housing will be positive for climate change mitigation as there will not be significant levels of construction contributing to greenhouse gas emissions from use of materials and energy. There are also benefits from reusing existing buildings and therefore making the most of embodied energy. Other safeguards are set out in policy CC-S1 Climate Change.
- 10.3.7. The policies were considered to have both positive and negative impacts on **Economy and Employment**. They are positive in providing local needs housing for workers and also rural land based workers / succession farming. Evidence demonstrates the need for this type of housing particularly given average incomes compared to average house prices. However, the overall policy approach of restricting housing to addressing local housing needs will be a constraint in terms of the economy overall as it will constrain growth and limit sectors such as construction. However, as stated above National Parks are not suitable locations for unrestricted housing development, without harm to landscape character and other special qualities.
- 10.3.8. No relevant issues were identified in relation to the **Coast**.
- 10.3.9. **Recommendations for HC-S1 Housing; HC-S2 Housing Conservation and Enhancement; HC-S3 Local Occupancy Criteria; HC-S4 Financial Contributions; and HC-D11 Replacement of Holiday Occupancy Conditions and Extended Family Ties**
- 10.3.10. No recommendations were identified for these policies.

10.4. **HC-S5 Principal Residence Housing**

- 10.4.1. The policy approach to housing is to focus on affordable housing provision. Market housing is permitted only to enable the delivery of affordable housing. However, where market housing is required to enable the delivery of affordable housing, it will be controlled by a mechanism which ensures it can be lived in by anyone but only as their principal residence and prevent it being occupied as a second/holiday home.
- 10.4.2. The policy scored strongly positive for the SA theme of **Community and Wellbeing and Housing** as it is aimed at supporting vibrant communities and delivery of affordable housing by preventing new housing from becoming second homes. Local services are likely to be supported as people will live in homes throughout the year rather than just during holiday periods.
- 10.4.3. The policy will also be positive for **Landscape**, as it does not allow open market housing to meet demand, which will help to protect landscape character. This will also enable co-location of housing close to services and employment, supporting sustainable **Transport** through helping to reduce the need to travel.
- 10.4.4. A mixed score was given in relation to the **Economy and Employment**. The policy supports local communities and hence indirectly supports the local economy, particularly through people living in homes and using services throughout the year. However, open market housing is not permitted, which could limit some economic development e.g. construction and supply businesses, but equally it will support the tourism sector through maintaining the high quality natural and built environment.
- 10.4.5. There may be both positive and negative implications in relation to **Land**. The policy is positive in not allowing open market housing, which would require land take. However, where market housing is required to cross-subsidise the delivery of affordable housing, this will require additional land take.
- 10.4.6. No specific implications were identified in relation to the remaining SA topics.

10.4.7. **Recommendations for HC-S5 Principal Residence Housing**

10.4.8. None identified.

10.5. **HC-D1 Conversions to Dwelling in Settlements; HC-D2 New Build Housing in Settlements;**

- 10.5.1. These policies set the criteria for new housing in settlements either through conversions or new build. The focus is on providing affordable housing to meet local needs, but an element of cross-subsidy through market housing will be considered where it can be shown that there are no other means of funding the scheme (CC-S5 Principal Residence Housing).
- 10.5.2. The policies were considered to be strongly positive in relation to **Housing** as they are specifically aimed to help ensure that local communities have access to appropriate, good

quality, sustainable, affordable housing. They provide flexibility for new build or conversion to housing within a wider range of settlements, as set out in the spatial strategy GP4. The policies also aim to ensure that housing makes good use of existing land and buildings, which will also make use of embodied energy.

- 10.5.3. The policies are positive in relation to **Community and Wellbeing** as they are intended to help to maintain thriving and inclusive communities through provision of local affordable housing within settlements either through new build or conversion. The focus is on providing for local needs rather than open market demand which will also help to reduce new housing becoming second homes. The policies will also support the **Economy and Employment**, as the location of housing in existing settlements will help to provide accommodation for local workers, supporting local businesses. Additional housing could also help to maintain the viability of services and facilities.
- 10.5.4. The policy approach in the draft Plan is to rely on exception sites coming forward to address local affordable housing needs, rather than allocating sites for housing, and so each proposal will have to be judged on its own merits, although overall levels of housing are likely to be low within the National Park and so impacts are not likely to be significant on **Landscape** or **Historic Environment**. Any potential impacts will be covered by other policy safeguards in the Plan, including GP1 National Park Purposes and Sustainable Development, CE-S1 Landscape Character and CE-S4 Cultural Heritage. The evidence gathered in the landscape sensitivity study to inform the settlement strategy has demonstrated that some new build housing can be accommodated within these settlements without damage to landscape character. Policy HC-D2 requires proposals for new build housing in settlements to be well related to existing buildings and to conserve or enhance the character of the settlement pattern.
- 10.5.5. There are likely to be mixed or uncertain implications in relation to the SA topic of **Land**. The policy approach is not to allocate sites for housing but to rely on rural exceptions sites being brought forward which provides less certainty over the use of land, and is likely to involve some land-take. However, the overall levels of housing are likely to be low, and the evidence gathered to inform the settlement strategy has demonstrated that housing can be accommodated within these settlements either through conversion of existing buildings, reuse of brownfield land, or limited greenfield development.
- 10.5.6. The policies require new housing or conversions to be located in existing settlements so will be positive in relation to the SA topics of **Climate Change Mitigation and Energy** and **Transport** as this should minimise the need to travel and emissions through co-locating housing, employment and services. Levels of traffic and congestion are problematic in some settlements at certain times of the year but this is primarily due to seasonal effects of tourism, and low level of additional housing is not likely to impact on overall traffic levels. HC-D2 requires the design and layout of development to meet other policy requirements relating to design and traffic.
- 10.5.7. A positive score was also given in relation to the SA topic of the **Coast**. The policies address the provision of housing in the settlements identified in the spatial strategy (GP4). This includes the coastal settlement of Lynmouth which is identified as a local service centre

where new build housing or conversions will be acceptable in principle. Because the plan is not allocating sites, and will rely on exception sites coming forward, each one will have to be judged on its own merits and in accordance with flood risk as set out in CC-S1 Climate Change and CC-D1 Flood Risk. The spatial strategy also identifies Porlock Weir as a community at risk of coastal change, and consequently new housing will be permitted but only to enable relocation of existing dwellings at risk from coastal change, in accordance with CC-S2 Responding to Coastal Change.

- 10.5.8. A neutral score was given in relation to the SA topics of **Biodiversity and Green Infrastructure** and **Climate Change and Adaptation to Flood Risk**. The policy approach in the draft Plan is to rely on exception sites coming forward rather than allocating sites, consequently each proposal will have to be judged on its own merits and against the other policies in the Plan. However, overall levels of housing are likely to be low so should not adversely affect biodiversity. Protection of biodiversity will be covered by GP1 National Park Purposes and Sustainable Development, and CE-S2 Biodiversity. Consideration of flood risk and climate change adaptation will be covered by CC-S1 Climate Change and CC-D1 Flood Risk. The spatial strategy set out in GP4 has identified settlements where housing will be allowed. An initial appraisal of flood risk and wildlife has been undertaken for each of these settlements, and consideration of flood risk assessment would need to be included in any proposals being brought forward.
- 10.5.9. A neutral score was also given in relation to **Air Quality and Water Resources**. The location of new housing will be within existing settlements, which may exacerbate air quality issues in some of the Local Service Centres through additional emissions from domestic properties. However, overall levels of housing likely to be low and so should not adversely affect air quality and water resources. The SA Scoping report concluded that levels of development should not exceed any health or air quality standards.
- 10.5.10. **Recommendations for HC-D1 Conversions to Dwellings in Settlements; HC-D2 New Build Housing in Settlements**
- 10.5.11. None identified.
- 10.6. **HC-D3 Specialist Housing for Exmoor's Communities; HC-D8 'Extended Family' Dwellings Criteria**
- 10.6.1. Policy HC-D3 makes provision for specialist housing for older people and other vulnerable members of the National Park's communities. The proportion of older people living on Exmoor is significantly higher than the national average and is likely to increase in future. As people grow older their housing needs often change and older people or those with disabilities may have specialist accommodation needs that are not met by the general housing stock. The policy allows for conversion of existing buildings or provision of specialist housing as part of the mix of a larger greenfield development. HC-D8 sets out criteria to assess proposals for the re-use of an existing traditional building as a dwelling for 'extended family', defined as a direct descendent or antecedent. Such dwellings would only be allowed through conversion of existing traditional buildings within the curtilage of

a dwelling in a settlement, or where there is an existing dwelling in a farmstead, and not in isolated locations.

- 10.6.2. The policies were considered to be strongly positive for the SA topics of **Housing** and **Community Wellbeing**. The policies are aimed at supporting thriving and inclusive communities, and are specifically designed to address the housing needs of local communities. Evidence shows that the housing needs are for smaller units with affordable rents, particularly for younger people and families and an ageing population. The policy to enable specialist housing specifically addresses the issue of an ageing population and vulnerable members of the community. The location of housing in existing settlements will support the maintenance of those communities including the continuation of services.
- 10.6.3. A positive score was given in relation to **Economy and Employment**, particularly in relation to policy HC-D8 as this could allow retention of local workers through enabling the provision of local affordable housing for workers. The policies are also positive for **Biodiversity and Green Infrastructure**, as conversion of buildings would need to take account of potential species in accordance with CE-S5 Principles for the Conversion or Structural Alteration of Traditional Buildings.
- 10.6.4. There are both positive and negative implications in relation to **Climate Change Mitigation and Energy**. The policies aim to ensure that housing makes good use of existing land and buildings, which will also make use of embodied energy. However, the provision of additional dwellings will also add to greenhouse gas emissions.
- 10.6.5. There are also mixed implications in relation to **Land and Landscape**. The policies provide for specialist housing / extended family housing through conversions which would make efficient use of land. Specialist housing could also be provided as part of a larger greenfield development which would require land take, although the size is restricted to 90m² to minimise land take and in recognition of the limited capacity for new build within the National Park due to landscape sensitivity. However, specialist housing may require more units to be provided to cross-subsidise the affordable housing, resulting in more land take, although safeguards are in place through Policy CE-S1 Landscape and GP1 National Park Purposes & Sustainable Development.
- 10.6.6. There are also mixed implications in relation to **Transport**. Proposals for specialist housing are required to be integrated into the local community to enable access to required services and facilities, although additional requirements for access and parking could be required for example in relation to disabled parking. There could be positive effects from extended family housing if this enables an extended family member to work on the family farm or business, this reducing the need to travel. Conversely, an additional dwelling could also increase travel movements from the occupants, or from care workers if an elderly/dependant relative.
- 10.6.7. The policies were given a negative score for the **Historic Environment**. The policy approach includes the appropriate subdivision and adaptation of existing dwellings, which could result in damaging alterations that affect the character and fabric of the building for example widening doorways and other measures to enable easier access for occupants of

specialist housing. Although any proposals would also need to comply with CE-S7 Design & Sustainable Construction Principles, there should also be cross-reference to CE-S4 Cultural Heritage which affords appropriate protection to buildings of historic and architectural interest.

- 10.6.8. A negative score was given for **Climate Change and Adaptation to Flood Risk** as no reference is made to flood risk implications, yet specialist housing in particular should not be located in flood risk due to the vulnerability of occupants. Proposals should also take account of climate change adaptation requirements in relation to heating and cooling due to the potential increased vulnerability of occupants.
- 10.6.9. No specific implications were identified in relation to the SA topics of **Coast and Air Quality and Water Resources**.
- 10.6.10. **Recommendations HC-D3 Specialist Housing for Exmoor’s Communities; HC-D8 ‘Extended Family’ Dwellings**

Recommendations	Changes
Add reference in the supporting text for HC-D3 to refer to CE-S4 Cultural Heritage and the need to ensure that any conversion work does not damage the fabric and character of the building	Accepted
Cross-refer to AC-D2 Parking in relation to any disabled parking that may be required for Specialist Housing.	Accepted
Amend HC-D3 to avoid areas of flood risk and incorporate climate change adaptation measures particularly in relation to heating and cooling	Accepted

10.7. **HC-D4 Conversions to Dwellings in the Open Countryside; HC-D5 New Build Dwellings in the Open Countryside; HC-D6 Rural workers; HC-D7 Succession Farming – Second Dwellings on Established Farms; HC-D10 Replacement of Rural Workers Occupancy Conditions; and HC-D9 Residential Caravans**

- 10.7.1. Policy HC-D4 allows conversions to dwellings in the open countryside where there is a proven need for housing to meet local needs, extended family requirements, or essential need for a rural worker providing the need cannot be met within the existing housing stock and the building is located within a hamlet or farmstead. HC-D5 New Build Dwellings in the Open Countryside will only be permitted where there is an essential need for a rural worker or succession farming that cannot be met within the existing housing stock, and where the dwelling is located close to existing buildings. Policy HC-D6 Rural Workers defines what is meant by rural workers. HC-D7 Succession Farming allows for second dwellings on established farms where housing for additional workers is required, this need cannot be met by existing housing stock and the dwelling is located close to existing

buildings. HC-D9 Residential Caravans enables temporary caravans to serve as housing for rural workers as they establish their business. HC-D10 Replacement of Rural Workers Occupancy Conditions allows existing agricultural occupancy conditions to be replaced with rural worker occupancy conditions (which have a wider definition to allow for forestry and other land based businesses), or to change to a local needs affordable occupancy tie.

- 10.7.2. These policies were considered to be positive for the SA topics of **Housing, Community and Wellbeing**, and **Economy and Employment** as they are intended to help provide accommodation for succession farming, extended families, and rural workers and thereby contribute to community wellbeing. They will also contribute to the local economy and employment by enabling people to live close to their place of work.
- 10.7.3. A positive score was also given for the SA topics of **Land, Landscape and Biodiversity and Green Infrastructure**. Although there could potentially be implications for landscape character, wildlife and land-take from new dwellings in the open countryside, the policy approach is to minimise these through conversion of existing buildings, and locating new dwellings close to existing buildings. In relation to the **Historic Environment**, conversion of existing buildings could potentially affect their character and fabric, but any proposals would need to meet the requirements of CE-S7 Design and Sustainable Construction Principles. There are also policy safeguards to ensure that there would be no conflict with the conservation of the landscape, wildlife or cultural heritage interests. Protection of landscape character, historic environment and biodiversity will also be covered by GP1 National Park Purposes, CE-S1 Landscape Character, CE-S2 Biodiversity, and CE-S4 Cultural Heritage. Overall levels of housing are likely to be low, however, as the Plan is not allocating specific sites, each proposal will have to be judged on its own merits.
- 10.7.4. The policies were also considered to be positive in relation to **Climate Change Mitigation and Energy**. The policies include reuse of existing buildings which will make use of embodied energy. The intention is to provide accommodation for rural workers and family, reducing the need to travel to work.
- 10.7.5. The remaining SA topics were given a neutral score. In relation to **Transport**, the intention is to provide accommodation for rural workers, reducing the need to travel to work. The policies are not likely to impact on **Air Quality and Water Resources** as the restrictions on the type and scale of development will limit what can be built. There are other safeguards in the plan to encourage water efficiency and avoid pollution for example from septic tanks. Providing additional accommodation on a farm or hamlet could potentially reduce the need to travel and therefore reduce emissions. Nothing specific was identified in relation to the SA topics of **Climate Change and Adaptation to Flood Risk** or the **Coast**.
- 10.7.6. **Recommendations for HC-D4 Conversions to Dwellings in the Open Countryside; HC-D5 New Build Dwellings in the Open Countryside; HC-D6 Rural workers; HC-D7 Succession Farming – Second Dwellings on Established Farms; HC-D10 Replacement of Rural Workers Occupancy Conditions; and HC-D9 Residential Caravans**
- 10.7.7. None identified.

10.8. **HC-D12 Subdivisions of Existing Dwellings; HC-D13 Residential Extensions; HC-D14 Outbuildings; HC-D15 Replacement Dwellings**

- 10.8.1. Policy HC-D12 allows any existing dwellings to be subdivided. Dwellings which are currently local affordable housing would have to remain as local affordable. If the dwelling has an agricultural occupancy tie it would have to remain so and demonstrate that there was a need for additional accommodation for rural workers, or it could become a local affordable dwelling. A principal residency condition will also be applied to any dwellings created under this policy. Policy HC-D13 Residential Extensions allows any existing building to be extended by 35% of the original floorspace. The overall size of the dwelling cannot exceed the maximum size of 90m² to ensure the dwelling remains affordable. Policy HC-D14 Outbuildings allows new buildings or conversions of existing buildings for ancillary purposes such as garages, sheds, or workshops. The outbuilding has to be proportionate to the size of the dwelling. Policy HC-D15 allows a replacement dwelling where the current building is in disrepair. The replacement should be close to the existing footprint and not bigger than the original building. The Policy excludes replacement of dwellings that are listed or of historic importance worthy of conservation.
- 10.8.2. These policies were considered to be positive in relation to the SA topics of **Community and Wellbeing** and **Housing**, as they provide flexibility for changes to existing dwellings and increasing the living space and utility of dwellings through extensions or outbuildings. They also aim to retain a stock of smaller units and mix of dwelling sizes which is what is required for affordability. Replacement of existing dwellings in disrepair would enable additional housing to be reutilised.
- 10.8.3. The policies are also positive for **Land** and **Landscape** as they are mainly about reuse, replacement of dwellings and small extensions or additional buildings within the existing curtilage, which will minimise land-take and any impacts on landscape.
- 10.8.4. A positive score was given in relation to the **Historic Environment**, as the policies require that conversions and alterations of existing buildings do not adversely affect buildings of historic or architectural interest, and to reflect the historic significance, character and appearance of the original building or its setting. Policy HC-D15 Replacement Dwellings does not allow replacement dwellings where the existing dwelling is are listed or of historic importance worthy of conservation, to ensure buildings of interest are retained. It also includes a clause to require replacement close to the original footprint of the dwelling unless cultural heritage benefits justify moving it.
- 10.8.5. The policies were considered to be positive in relation to **Climate Change Mitigation and Energy**. Subdivision of existing buildings would make good use of embodied energy, and replacement dwellings and outbuildings would need to comply with CC-S7 Design and Sustainable Construction Principles including sustainable construction and energy efficiency measures.
- 10.8.6. A positive score was also given in relation to **Transport**, as the policies include requirements to minimise impacts on parking and highway safety, although cross-

reference should be made in the supporting text for HC-D15 Replacement Dwellings to AC-D2 Parking Provision to ensure that parking and access requirements are acceptable.

- 10.8.7. A neutral score was given in relation to **Biodiversity and Green Infrastructure**, as the policies relate to the reuse of existing buildings or small extensions and additions to them. Any potential implications relating to existing wildlife interest would be covered by CE-S2 Biodiversity. Policy HC-D15 Replacement Dwellings includes a clause to require replacement close to the original footprint of the dwelling unless wildlife benefits justify moving it.
- 10.8.8. A neutral score was also given for **Climate Change and Adaptation to Flood Risk**, the **Coast and Air Quality and Water Resources** as there are not likely to be any significant implications as the policies relate to the reuse of existing buildings or small extensions and additions to them. Any issues relating to climate change adaptation or flood risk (e.g. raising floor levels for extensions in flood risk areas) would be covered by CC-S1 Climate Change and CC-D1 Flood risk.
- 10.8.9. No significant implications were identified for **Economy and Employment**, as extensions or outbuildings for home working or home base businesses would be covered by separate policies.
- 10.8.10. **Recommendations for HC-D12 Subdivision of Existing Dwellings; HC-D13 Residential Extensions; HC-D14 Outbuildings; HC-D15 Replacement Dwellings**

Recommendations	Changes
Include a reference in the supporting text for HCD-15 Replacement Dwellings to ensure that parking and access requirements are acceptable, in accordance with policy AC-D2 Parking Provision and Standards	Accepted

10.9. **HC-S6 Travelling Communities**

- 10.9.1. Policy HC-S6 Travelling communities allows for small sites to be identified on an exceptions basis where there is proven need (and this cannot be provided outside the National Park boundary), and other criteria. There is no outstanding need that has been identified for Exmoor, although the assessment is currently being updated.
- 10.9.2. The policy was considered to be positive in relation to the SA topics of **Housing and Community and Wellbeing** as it seeks to provide for the accommodation needs of traveller communities. Where sites are required these should be located in or close to a settlement and be accessible to appropriate health and educational facilities. The policy also requires the interests of the settled community to be respected. There are also benefits in relation to the **Economy and Employment** as providing for the needs of travelling communities should avoid the problems associated with unauthorised encampments which can have a

negative impact on the local character and amenity of an area with potential knock-on impacts on local businesses, particularly tourism. In seeking to provide for the needs of traveller communities in a planned way, this should ensure that any sites identified are appropriately located and do not impact on local character or amenity.

- 10.9.3. A positive score was also given for **Land** and **Landscape**. Whilst no specific allocation of sites is given, meaning there are no specific impacts on landscape to consider, the policy approach is to protect the National Park through seeking to provide for the needs outside the National Park, and any sites that are identified within the National Park should be accommodated without harm to the National Park. The policy requires any sites to be located in or adjoining settlements which could include consideration of brownfield sites, and to conserve or enhance settlement character and pattern; to be met without an adverse impact on the landscape and application to be accompanied by a landscaping scheme. By seeking to provide for the needs of traveller communities in a planned way, the policy should help to avoid the problems associated with unauthorised encampments which can have a negative impact on land including increased litter and waste.
- 10.9.4. A neutral score was given in relation to **Biodiversity and Green Infrastructure**. No specific allocation of sites is given, so there are no specific impacts on biodiversity or green infrastructure to consider. The policy approach is to protect the National Park through seeking to provide for the needs outside the National Park, and for any sites that are identified within the National Park should be accommodated without harm to the National Park. Similarly in relation to the **Historic Environment**, the policy requires any sites to conserve or enhance settlement character and pattern. Overall the policy approach is to prevent harm to the National Park.
- 10.9.5. No specific implications were identified in relation to **Transport**. Where sites are required these should be located in or close to a settlement and be accessible to appropriate health and educational facilities, which should reduce the need to travel.
- 10.9.6. No implications were identified for the SA topics of the **Coast** or **Climate Change Mitigation and Energy**.
- 10.9.7. A negative score was given in relation to two topics, **Climate Change and Adaptation to Flood Risk** and **Air Quality and Water Resources**. If circumstances arise where a site is required to address a proven local need, then identification of sites would need to consider any issues of flood risk given the vulnerability of the use as caravan or mobile home sites intended for permanent occupation are regarded to be at higher risk (classified as 'highly vulnerable')¹⁴. Site selection would also need to include provision of suitable water and sewerage infrastructure to ensure there are no adverse impacts on water resources or air quality.
- 10.9.8. **Recommendations for HC-S6 Travelling Communities**

¹⁴ Technical Guidance to the NPPF, 2012, CLG Table 2 Flood Risk Vulnerability classification

Recommendations	Changes
Add reference in supporting text to include provision of suitable water and sewerage infrastructure to ensure there are no adverse impacts on water resources or air quality.	Accepted
Identification of sites would need to consider any issues of flood risk in relation to the vulnerability of the use (caravans). Add reference in the text to flood risk and policy CC-D1.	Accepted

10.10. **HC-S7 Local Commercial Services and Community Facilities, HC-D16 Local Commercial Service Provision and HC-D17 Safeguarding Local Services and Community Facilities**

10.10.1. Policies HC-S7 and HC-D16 support the provision of new or extended community facilities and local commercial services including pubs, restaurants, and shops. HC-D17 safeguards existing services and facilities.

10.10.2. The policies scored strongly positive for **Communities and Wellbeing** as they are intended to improve the sustainability, resilience and self-sufficiency of the National Park's settlements by supporting the retention, provision of, and access to local commercial services and community facilities. As well as supporting the retention and enhancement of existing services, the policies encourage the provision of new services provided the criteria are met. This responds to issues raised during the consultation including insufficient facilities for young people. The policy supports objectives on health and wellbeing by including provision of services such as doctors' surgeries, and also open space which can provide opportunities for active lifestyles, access to tranquil places and so on, although the supporting text should specify that *publicly accessible* amenity space is supported. Similarly, reference is made to provision of schools including pre-schools which also provide wider community facilities such as sports fields. Some settlements link together in terms of the collective services and facilities they provide and the sharing of local multi-service facilities is encouraged. Health and social welfare issues are a priority in dispersed rural areas such as Exmoor, and the importance of local services for older people, those with disabilities or limiting long term illnesses is recognised. HC-D17 aims to prevent existing community services or facilities being lost, or where these are no longer viable, to securing them for an alternative use that benefits the community such as local affordable housing or employment use.

10.10.3. The policies were also considered to be strongly positive for the **Economy and Employment** as they relate to local commercial services including pubs, restaurants, and shops. There are positive benefits for local employment and also local businesses can provide services and products for the community facilities. The provision of local services

will also benefit businesses for example banks, petrol stations, or in providing necessary services for employees. Existing commercial services are also safeguarded

- 10.10.4. The policies were considered to be positive in relation to **Air Quality and Water Resources and Transport**. They aim to retain local service provision, either in specific settlements, or through the linking of settlements in terms of the collective services and facilities they provide, which will reduce the need to travel and therefore reduce emissions (benefiting air quality and climate change mitigation). The supporting text highlights the importance of community services and facilities in dispersed rural areas which reduces the need to travel, and cross-refers to AC-S1 sustainable transport. Some settlements link together in terms of the collective services and facilities they provide. HC-S7 supports new or extended facilities and sharing of facilities providing the criteria can be met. Reference is made to the Exmoor National Park Open Space Strategy which assesses existing open amenity space. This does not reference water resources such as rivers and floodplains, which also provide important amenity functions within settlements.
- 10.10.5. HC-S7 and HC-D17 scored positively for **Biodiversity and Green Infrastructure**. There is reference in the supporting text to the Exmoor National Park Open Space Strategy which assesses existing open amenity space including natural and semi natural green spaces. There is also reference to the opportunity for local communities to designate 'local green space' through the Local Plan or Neighbourhood Plans, which could be due to its wildlife value. HC-S7 supports improvement of existing facilities where enhancement of the built and natural environment can be achieved.
- 10.10.6. The policies were considered to be positive in relation to **Climate Change Mitigation and Energy** as they aim to retain local service provision, which will reduce the need to travel and therefore reduce greenhouse gas emissions. The supporting text identifies that some settlements link together in terms of the collective services and facilities they provide, which could also reduce the need to travel to larger centres. HC-S7 supports new or extended facilities and sharing of facilities providing the criteria can be met. It encourages the re-use of existing buildings which will also be positive in relation to embodied energy. There could be support for community renewables both in terms of installing renewable energy technologies in community facilities such as village halls, or community renewable energy schemes.
- 10.10.7. The policies were positive for **Historic Environment**. HC-S7 gives preference to the reuse of traditional buildings, although change of use of non-traditional buildings or a replacement building may be acceptable if enhancement of the built or natural environment can be achieved. The explanatory text should be expanded to reflect this policy approach and cross refer to policy CE-S4 Cultural Heritage and CE-S5 Principles for the Conversion or Structural Alteration of Traditional Buildings.
- 10.10.8. The policies were considered to be positive in relation to **Land**. They support the efficient use of land by giving preference to the reuse of traditional buildings and allowing change of use of non-traditional buildings or a replacement building may be acceptable if enhancement of the built or natural environment can be achieved. HC-S7 requires new-build developments to be located within Local Service Centres and Villages, or well related

to the settlement. The re-use of existing buildings and location of new development in or closely associated to existing settlements, including those designated as Rural Communities will reduce the need for new development on greenfield sites. The policy supports the provision of community services and facilities including petrol stations, which could be a pollution hazard, although this would be regulated and measures would need to be put in place to reduce risks.

- 10.10.9. A positive score was given in relation to **Landscape**, as the policies are focused on safeguarding existing facilities and providing shared facilities and multi-purpose facilities, which will all help to protect landscape character. Preference is given to the change of use of traditional buildings which would also help to safeguard these components of landscape character. Where new facilities are required, they should be located within Local Service Centres and Villages, or well related to the settlement. There is no reference to the setting of the settlement and its landscape character. Open space can form an important part of landscape character including designed landscapes and natural / semi-natural green spaces. Community orchards could be added to the list as they form important part of landscape character in the National Park.
- 10.10.10. The policies were considered to be neutral in relation to **Climate Change and Adaptation to Flood Risk, and Coast**. There may be circumstances where replacement of existing community services and facilities is required due to coastal change or flood risk. However, this would be covered by policy CC-S2 Responding to Coastal Change. Similarly, any new facilities would need to take account of flood risk in accordance with CC-D1 Flood Risk.
- 10.10.11. The policies were also considered to be neutral in relation to **Housing**, as they are primarily about provision of services and facilities and does not directly relate to housing provision, although the approach is to support the retention of services and facilities within settlements that are accessible to local communities. Where existing services or facilities cannot be retained, the preferred approach is for change of use to uses that benefit the community, including local affordable housing.
- 10.10.12. **Recommendations for HC-S7 Local Commercial Services and Community Facilities, HC-D16 Local Commercial Service Provision and HC-D17 Safeguarding Local Services and Community Facilities**

Recommendations	Changes
Add reference to amenity space including community orchards, rivers and floodplains in bullet list	Not changed as the text reflects what was included in the Open Space Strategy. The Green Infrastructure policies recognise the role of rivers and floodplains as amenity space
Amend HC-S7 to add ' <i>The provision of publicly accessible green space will be supported where it benefits the community</i> ' and supporting text to refer to ' <i>publicly</i>	Accepted

<i>accessible amenity spaces....'</i>	
Add reference to community renewables	Accepted
Expand the supporting text to reflect the policy approach giving preference to the reuse of traditional buildings, and cross refer to policy CE-S4 (Cultural Heritage) and CE-S5 (Principles for the Conversion and Structural Alteration of Traditional Buildings)	Accepted
Amend HC-S7 to read 'New build developments should be located within the named settlements, or where no suitable site exists, are well related to the settlement, <i>and its setting</i> '	Accepted
Add reference in the supporting text to consideration of flood risk, and cross-refer to CC-D1 Flood Risk	Accepted

10.11. **HC-D18 Important Visual Amenity Space**

- 10.11.1. Policy HC-D18 protects land of visual amenity value within and adjoining settlements. It recognises the significance of these green areas to the setting of buildings and other features, their importance to the overall character of a settlement and to the buildings themselves.
- 10.11.2. HC-D18 was considered to be strongly positive for **Landscape**. The policy is intended to protect areas of land that have a landscape value to communities and the settlements they live in. It identifies land of visual amenity value within and adjoining settlements, which recognises the significance of these green areas to the setting and overall character of the settlement and individual buildings. The explanatory text explains how the selection has been undertaken by a professional landscape architect, and provides the criteria by which the selection has been made, including screening, setting, visual connections and experience. The policy reflects the importance of visual amenity space and its relationship with settlement character, the surrounding landscape or the cultural/historic traditions of individual settlements.
- 10.11.3. HC-D18 was positive in relation to **Biodiversity and Green Infrastructure**. The explanatory text recognises that amenity space can provide multiple benefits. The main purpose is for visual amenity, although such spaces can also contribute to green infrastructure and so could indirectly benefit biodiversity. These benefits include linkages between habitats and sites. The protection of visual amenity space would also protect any biodiversity interest.
- 10.11.4. The policy was also considered to be positive for **Community and Wellbeing**. The protection of visual amenity space will promote community wellbeing by providing open views and spaces that people can enjoy as well as providing spaces for informal activities such as dog walking or for community events such as fetes. The criteria for the selection of

visual amenity space include areas of historic and cultural significance, used by the public, and core areas associated with community facilities. The spaces have been identified by the communities through consultation and so represent what is important locally to them – this should be made clearer in the explanatory text. Publicly accessible space for recreation is dealt with under HC-S7 and HC-D17.

- 10.11.5. HC-D18 scored positively for **Historic Environment**. The criteria for selecting important visual amenity space include areas of historic and cultural significance. The designation will be applied within existing Conservation Areas as this status does not prevent the development of such land in principle. The policy reflects the importance of visual amenity space and its relationship with settlement character, the surrounding landscape or the cultural and historic traditions of individual settlements.
- 10.11.6. HC-D18 also scored positively for **Land**, as the protection of visual amenity space will safeguard land from development.
- 10.11.7. There are both positive and negative implications for **Economy and Employment**. The protection of visual amenity space could inhibit economic activity if a landowner wanted to develop the land for employment uses. However, the protection of such space will help to retain the overall character of places, which are important to the economy generally in terms of tourism.
- 10.11.8. HC-D18 scored negatively for **Housing** as the protection of visual amenity space could prevent the development of visual amenity space for housing, particularly given the constrained nature of many of Exmoor’s settlements.
- 10.11.9. HC-D18 was considered to be neutral in relation to **Air Quality and Water Resources**, and **Climate Change and Adaptation to Flood Risk**. The explanatory text recognises that amenity space can provide multiple benefits. The main purpose is for visual amenity, although such spaces can also contribute to green infrastructure and so could indirectly benefit air quality and water resources, and could potentially include areas that are in the functional floodplain or flood risk zones. Adaptation to climate change could require developments in settlements e.g. replacement development which may override the visual amenity space.
- 10.11.10. No specific implications were identified in relation to the SA topics of **Climate Change Mitigation and Energy, Coast and Transport**.
- 10.11.11. **Recommendations for Policy HC-D18 Important Visual Amenity Space**

Recommendations	Changes
The explanatory text should highlight how the visual amenity spaces have been identified by the communities through consultation and so represent what is important locally to them	Accepted

Highlight the benefits of amenity space for health and wellbeing of local communities and visitors	Accepted
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10.12. Policy HC-S8 Residential Institutions

- 10.12.1. Policy HC-S8 supports the reuse of existing buildings as residential institutions such as care homes, nursing homes or residential educational facilities.
- 10.12.2. The policy is strongly positive in relation to **Community and Wellbeing** and **Housing** as it seeks to address the housing needs of older people including those with support or care needs, in recognition of the ageing population. Proposals must be located in settlements so that they can be integrated into the local community and be well located to enable access to services and facilities.
- 10.12.3. The policy will also be positive for the **Economy and Employment** as proposals for residential institutions could support the local economy and provide employment.
- 10.12.4. The policy is positive for **Landscape** and **Land** as it relates to the reuse of existing buildings, which will reduce land-take and impacts on landscape character. Proposals should not compromise local amenity or result in an unacceptable impact on the character of the area. The restriction of such uses to settlements will help to protect the landscape and character of the open countryside.
- 10.12.5. A positive score was also given in relation to **Historic Environment**, as the policy relates to the reuse of existing buildings, which could be positive in bringing traditional buildings back into viable use. Care will need to be taken to ensure that proposals do not damage the fabric or character of the building, and reference is made to policies CE-S5 and CE-S6 on the conversion and structural alteration of buildings. For buildings identified as a heritage asset or within a Conservation Area, policies CE-S4 Cultural Heritage and CE-D3 Conserving Heritage Assets will also apply.
- 10.12.6. A neutral score was given for **Biodiversity and Green Infrastructure**. The policy relates to the reuse of existing buildings, so should not significantly affect biodiversity and green infrastructure. Reference should be made to CE-S2 (Biodiversity) to ensure that any existing biodiversity interest is taken into account (e.g. bats/birds in roof spaces).
- 10.12.7. A neutral score was also given in relation to **Climate Change and Adaptation to Flood Risk**. The policy relates to reuse of existing buildings rather than new build, but consideration will still need to be taken of the vulnerability of use in relation to flood risk, particularly for care homes or nursing homes which are classified as ‘more vulnerable’. Such uses should not be allowed in Flood zones 3b, and the exceptions test should be applied to proposals in flood zone 3a¹⁵. There should also be consideration of other climate change adaptation implications, in relation to heating and cooling.

¹⁵ CLG Technical Guidance to the National Planning Policy Framework 2012

10.12.8. There could be both positive and negative implications for **Air Quality and Water Resources, Climate Change Mitigation and Energy, and Transport**. The policy relates to reuse of existing buildings which will be positive in relation to the use of embodied energy, and air and water quality. However, the nature of their use as nursing homes, care homes or educational facilities could require additional resources such as water supplies and energy, particularly where they are caring for elderly people, although previous uses as hotels for example would have had similar requirements. Where possible, sustainable resource use should be encouraged through for example energy efficiency measures or use of renewable energy technologies if appropriate. Reference is made in the supporting text to CE-S7 Design and Sustainable Construction Principles. The change of use could result in additional travel movements and parking requirements, for example in relation to residential educational facilities, and a transport assessment may be required. Reference is made to AC-D1 Transport and accessibility requirements for development, and AC-D2 Parking Provision and Standards.

10.12.9. No specific implications were identified in relation to the **Coast**.

10.12.10. **Recommendations for Policy HC-S8 Residential Institutions**

Recommendations	Changes
Add reference in the supporting text to CE-S2 Biodiversity	Accepted
Add reference to the need to consider climate change adaptation and flood risk, particularly relating to the vulnerability of the proposed use, and cross refer to CC-S1 Climate Change, CC-D1 Flood Risk	Accepted

11. Appraisal of Draft Local Plan Policies – Chapter 8 Achieving a Sustainable Economy

11.1. Overview

11.1.1. This Chapter covers the following Policies:

- **SE-S1 A Sustainable Rural Economy**
- **SE-S2 Business Development in Local Service Centres and Villages**
- **SE-S3 Business Development in the Open Countryside**
- **SE-D1 Home Based Businesses**
- **SE-D2 Safeguarding Existing Employment Land and Buildings**
- **SE-S4 Agriculture and Forestry Development**

11.1.2. A summary of the scores for these Policies is given in **Table 9** (please refer to the key for the scoring system at Table 1, page 8).

Table 9 – Summary scores for Draft Policies Chapter 8: Achieving a Sustainable Economy

SA topics	SE-S1	SE-S2	SE-S3	SE-D1	SE-D2	SE-S4
Air quality and water resources	0	0	+	+	0	+
Biodiversity and Green Infrastructure	+	0	+	+	0	+
Climate change and adaptation to flood risk	+	0	0	0	0	+
Climate change mitigation & energy	+	+	+	+	+	+
Community wellbeing	+	+	+	++	++	+
Economy and employment	+	+	+	++	++	+
Historic environment	+	+	+	+	0	+
Housing	+	0	0	0	+	0
Land	+	+	+	+	+	+
Landscape	++	+	+	+	0	++

SA topics	SE-S1	SE-S2	SE-S3	SE-D1	SE-D2	SE-S4
Coast	0	0	0	0	0	0
Transport	+	+	+	+	0	+
						0

Split cells indicate where scores have changed as a result of the SA, the bottom cell shows the original score, and the top cell shows the score following the SA

11.2. **Overall assessment of Draft Policies Chapter 8 Achieving A Sustainable Economy**

- 11.2.1. Overall, it can be seen that the policies in Chapter 8 *Achieving a Sustainable Economy* are positive or neutral in relation to the sustainability objectives. The policy approach seeks to positively encourage appropriate business and employment development to help to strengthen, enhance and diversify the Exmoor economy and create employment. However, the policies also seek to ensure the economic benefits of Exmoor’s high quality environment can continue so that new development avoids negative impacts on the area and is consistent with statutory National Park purposes. This is likely to constrain some economic development, for example the creation of new large scale employment opportunities such as major industry would be inappropriate within the National Park. As a consequence, some of the policies are not as strongly positive in relation to the Economy and Employment sustainability objectives as might have been expected.
- 11.2.2. There is a focus on safeguarding existing sites and buildings, the re-use of existing buildings, and encouraging home-based working. This will minimise greenfield development and is a more sustainable approach in a National Park, given the limited supply of suitable greenfield land. It will also reduce the need to travel, contributing to climate change mitigation and sustainable transport objectives. The change of use to employment can also help secure the retention of a building’s character, whilst also supporting the local economy. The draft Local Plan does not include the allocation of employment sites, and these will consequently need to be considered on a case by case basis in relation to their sustainability. Any new employment sites and buildings that do come forward will be focused in existing settlements and will be of a type, scale and design appropriate to the local and National Park context, which will help to maintain the settlement character, minimise land-take and reduce the need to travel.
- 11.2.3. In the open countryside, Policy SE-S3 provides opportunities for employment development through the extension of existing employment buildings and the reuse of existing buildings in farmsteads or hamlets, particularly traditional buildings of historic or vernacular merit which could support farm diversification and help to provide local employment. Policy SE-S4 also supports agricultural and forestry development, in recognition of the vital role that traditional farming and woodland management has played in creating Exmoor’s distinctive landscape and the importance of enabling the sector to respond to current and future changes.

11.2.4. The following sections set out the SA assessments for each policy in more detail, including recommendations made by the SA to strengthen the draft policies, and how these have been taken on board in the draft Local Plan.

11.3. **SE-S1 A Sustainable Rural Economy**

11.3.1. Policy SE-S1 'A Sustainable Rural Economy' seeks to positively encourage appropriate business and employment development to help to strengthen, enhance and diversify the Exmoor economy and create employment. The policy also seeks to ensure the economic benefits of Exmoor's high quality environment can continue so that new development avoids negative impacts on the area and is consistent with statutory National Park purposes. SE-S1 is supported by two Development Management policies covering business development in settlements and the open countryside.

11.3.2. SE-S1 was considered to be strongly positive for the SA theme of **Landscape**. Proposals for business and employment development must be consistent with National Park purposes and GP1, which includes protection of landscape character. The policy encourages reuse of existing traditional buildings, and in the open countryside only reuse of or extension to existing buildings is allowed, which will support retention of buildings which contribute to landscape character. Proposals for extensions or intensification of existing buildings must not have an unacceptable impact on amenity and the appearance and character of landscape. Proposals for business or warehouse intrusive development which conflicts with National Park purposes will not be permitted.

11.3.3. SE-S1 was given a positive score in relation to the SA theme of **Economy and Employment**, and not strongly positive as might have been expected. Although the policy is primarily aimed at supporting the economy and employment, business development has to be appropriate within the National Park context and there will consequently be some restrictions on the type and scale of business development allowed.

11.3.4. SE-S1 was positive for **Biodiversity and Green Infrastructure** and **Historic Environment**. Proposals for business and employment development must be consistent with National Park purposes and GP1, which includes protection of biodiversity and the historic environment. The policy encourages reuse of existing traditional buildings and in the open countryside only reuse of or extension to existing buildings is allowed. The change of use to employment can help secure the retention of a building's character in a way which can be difficult to achieve in conversions to residential use, whilst also supporting the local economy.

11.3.5. The re-use of existing buildings is encouraged which will be positive for the SA theme of **Land**, as it minimises greenfield development and is therefore a more sustainable approach in a National Park, given the limited supply of suitable green field land. Existing employment land and buildings will be safeguarded. The location of new business development in or adjacent to the named settlements should help to reduce land-take, and home based working is also encouraged. The policy encourages reuse of existing traditional buildings, and in the open countryside only reuse of or extension to existing

buildings is allowed. Business or warehouse development that would be environmentally damaging would not be allowed, which would avoid the risk of contaminated land.

- 11.3.6. SE-S1 was positive for the SA themes **Transport** and **Climate Change Mitigation and Energy**. The location of new business development in or adjacent to the named settlements should help to reduce the need to travel, and home based working is also encouraged, which could both reduce potential emissions from transport. The policy encourages reuse of existing traditional buildings, and in the open countryside only reuse of or extension to existing buildings is allowed. This will mitigate emissions and make the best use of embodied energy in existing buildings.
- 11.3.7. SE-S1 supports the SA objectives relating to **Community and Wellbeing** and **Housing** as economic development and employment will be positive for local communities. The policy supports home working, and where proposals may result in the loss of employment land, opportunities to provide affordable housing or community uses will be sought. Proposals for extensions or intensification of existing buildings must not have an unacceptable impact on amenity.
- 11.3.8. The policy was given a neutral score in relation to the SA Theme of **Air Quality and Water Resources**. Generally economic activity on Exmoor is not large scale and does not involve major industrial processes. The impacts on air and water quality are therefore not likely to be significant. The location of new business development in or adjacent to the named settlements should help to reduce the need to travel, and consequently potential emissions from transport.
- 11.3.9. SE-S1 was also given a neutral score in relation to the SA Themes of **Climate Change and Adaptation to Flood Risk**, and **Coast**. There is no reference to climate change adaptation or flood risk, although proposals for business and employment development would not be encouraged in areas of flood risk. Cross-reference should be made in the text to CC-S1 Climate Change and CC-D1 Flood Risk.
- 11.3.10. **Recommendations for SE-S1 A Sustainable Rural Economy**

Recommendations	Changes
There is no reference to climate change adaptation or flood risk, although proposals for business and employment development would not be encouraged in areas of flood risk. Cross-reference should be made in the text to CC-S1 Climate Change and CC-D1 Flood Risk	Accepted

11.4. **SE-S2 Business Development in Local Service Centres and Villages**

- 11.4.1. Policy SE-S2 applies to business development in Local Service Centres and Villages. To ensure that the character of the National Park is conserved and enhanced and in

accordance with the settlement hierarchy set out in GP4, new employment sites and buildings will be focused in existing settlements and will be of a type, scale and design appropriate to the local and National Park context.

- 11.4.2. The policy was considered to be positive in relation to the **Economy and Employment**. Within named settlements, the policy provides flexibility through encouraging reuse of traditional buildings, and non-traditional buildings first, then replacement of existing buildings where this would allow enhancement, and finally extensions or new build. However, business development has to be appropriate within the National Park context and there will consequently be some restrictions on the type and scale of business development allowed. Consequently the policy was given a positive rather than strongly positive score for this theme. It is also positive for local communities and **Community and Wellbeing**.
- 11.4.3. The policy is also positive for **Transport** and **Climate Change Mitigation and Energy**. The location of new business development in or adjacent to the named settlements should help to reduce the need to travel, and potential emissions from transport. The policy encourages reuse of existing traditional and non-traditional buildings. This will mitigate emissions and make the best use of embodied energy in existing buildings. Reference is made to policy CE-S7, which encourages sustainable design and construction methods. The location of new business development in or adjacent to the named settlements should help to reduce the need to travel.
- 11.4.4. A positive score was also given in relation to the SA topics of **Landscape**, and **Historic Environment**. Proposals must accord with SE-S1 Sustainable Exmoor Economy, which includes protection of landscape and the historic environment as business and employment development must be consistent with National Park purposes and GP1. Proposals for business and employment development must be well related to existing buildings, and appropriate to the scale and form of the settlement. Re-use of traditional buildings is encouraged, although cross-reference should be made to CE-S4 Cultural Heritage to ensure that this accords with the conservation of heritage assets. Replacement of existing buildings would be permitted where they harm the character or appearance of the area, and this would achieve enhancement, for example to the landscape character or setting of the settlement.
- 11.4.5. A positive score was given for the SA topic of **Land**. The location of new business development in or adjacent to Local Service Centres and Villages and the reuse of existing buildings should help to reduce land-take. The reuse of previously developed sites in these settlements would be permitted where this provides opportunities for enhancement, for example the remediation of contaminated land.
- 11.4.6. The policy was considered to be neutral in relation to **Biodiversity and Green Infrastructure**. There is no direct reference to biodiversity, however, proposals must accord with SE-S1 A Sustainable Exmoor Economy, which includes protection of biodiversity as business and employment development must be consistent with National Park purposes and GP1.

- 11.4.7. The policy was considered to be neutral in relation to **Air Quality and Water Resources**, as generally economic activity on Exmoor is not large scale and does not involve major industrial processes. The impacts on air and water quality are therefore not likely to be significant. The location of new business development in or adjacent to the named settlements should help to reduce the need to travel, and consequently potential emissions from transport
- 11.4.8. A neutral score was also given in relation to **Climate Change and Adaptation to Flood Risk**. There is no reference to climate change adaptation or flood risk, although proposals for business and employment development would not be encouraged in areas of flood risk. However, proposals must comply with other Plan policies, which would include CC-S1 Climate Change and CC-D1 Flood Risk. If the recommendation to refer to flood risk in relation to SE-S1 A Sustainable Exmoor Economy is accepted, this will also highlight the need to consider flood risk issues.
- 11.4.9. No specific implications were identified in relation to the SA topics of **Housing or Coast**.
- 11.4.10. **Recommendations for SE-S2 Business Development in Local Service Centres and Villages**

Recommendations	Changes
The policy encourages reuse of existing traditional buildings to encourage their continued use and viability, and to retain them in a good state of repair. However, any reuse or alteration of traditional buildings would need to be done in a way that maintains or enhances their character, and cross-reference should be made in the supporting text to CE-S4 Cultural Heritage	Accepted

11.5. **SE-S3 Business Development in the Open Countryside**

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

which will affect the type and scale of business development allowed. Consequently the policy scores positive rather than strongly positive for this theme.

- 11.5.3. The policies are also positive for the SA topics of **Air Quality and Water Resources, Biodiversity and Green Infrastructure, Historic Environment, and Landscape**. Proposals will only be permitted where they have an acceptable impact on the landscape, wildlife or historic environment of the National Park and will not cause pollution or other unacceptable environmental impacts. The policy encourages reuse of existing traditional buildings, but proposals should not have an unacceptable impact on the historic environment or any protected species such as bats or barn owls which use traditional or existing buildings. The policies relate to reuse of existing buildings, or extensions to existing businesses, which will reduce impacts on landscape character, and proposals will only be permitted where the scale and appearance of the development are acceptable, for example use of buildings which stand alone or do not relate well to existing buildings will not be permitted.

- 11.5.4. The policy is also positive for **Land** as it relates to the reuse of existing buildings, or extensions to existing businesses, which will reduce potential land-take. The policy allows flexibility for diversification of existing agricultural businesses, which will help to sustain existing land-based activity and consequently land management which is important to conservation of the National Park’s special qualities.

- 11.5.5. A positive score was also given in relation to the SA topics of **Transport and Climate Change Mitigation and Energy**. The policy encourages reuse of existing traditional buildings (and non-traditional buildings on farms). This will mitigate emissions and make the best use of embodied energy in existing buildings. Reference is made to policy CE-S7, which encourages sustainable design and construction methods. Proposals must demonstrate that satisfactory access and traffic requirements can be achieved consistent with National Park purposes. However, the location of new business activity in the open countryside could lead to increased travel movements and consequently emissions, so cross-reference should be made to the transport policies in Chapter 10 of the draft Local Plan to ensure that levels of traffic and emissions are acceptable.

- 11.5.6. A neutral score was given in relation to **Climate Change and Adaptation to Flood Risk**. There is no reference to climate change adaptation or flood risk, although proposals for business and employment development would not be encouraged in areas of flood risk. However proposals must accord with SE-S1 Sustainable Exmoor Economy and the SA recommendation for this is that it should cross-refer to other Plan policies, including CC-S1 Climate Change and CC-D1 Flood Risk.

- 11.5.7. No specific implications were identified in relation to the SA topics of the **Coast and Housing**.

- 11.5.8. **Recommendations for SE-S3 Business Development in the Open Countryside**

Recommendations	Changes
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<p>The location of new business activity in the open countryside could lead to increased travel movements and consequently emissions. Cross-reference should be made to the Transport policies in Chapter 10 <i>Achieving Accessibility for All</i> to ensure that levels of traffic and emissions are acceptable</p>	<p>Accepted</p>
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11.6. **SE-D1 Home Based Businesses**

- 11.6.1. SE-D1 supports home working through allowing home based businesses of an appropriate scale and activity. This includes use of a residential property, a small extension, conversion of existing outbuildings within the curtilage or where these are not available, new small scale buildings within the curtilage.

- 11.6.2. The policy is strongly positive for the **Economy and Employment** and **Community and Wellbeing** as it provides flexibility for home working, in order to support local communities including those living in the hamlets outside the named settlements. A high percentage of people work from home in the National Park, so this is particularly important. There are caveats to ensure that proposals do not cause adverse impact on the amenity of the area or occupiers of neighbouring properties.

- 11.6.3. The policies are positive for **Landscape** and **Land**, as they seek to minimise land-take through the re-use of existing buildings and also ensure that any new buildings are within the curtilage or close to existing buildings, which will reduce impacts on landscape character. Proposals should not cause adverse impact on the landscape or amenity of the area and must accord with SE-S1 A Sustainable Exmoor Economy, which includes protection of landscape character as business and employment development must be consistent with National Park purposes and GP1.

- 11.6.4. A positive score was also given for **Air Quality and Water Resources, Climate Change Mitigation and Energy** and **Transport** as the policy encourages home working which will reduce the need to travel and therefore emissions. Impacts on the amenity of the area including from potential additional traffic generation and access, have to be considered. However, any proposals for home working should encourage energy efficiency measures to reduce emissions from homes, and cross reference should be made to CE-S7 Design and Sustainable Construction Principles.

- 11.6.5. A neutral score was given in relation to **Biodiversity and Green Infrastructure** and **Historic Environment**. The reuse of existing buildings including ancillary buildings or new outbuildings within the curtilage, could have an effect on the historic character of those buildings, and cross-reference to CE-S4 Cultural Heritage should be made. There is no reference to biodiversity, however checks should be made to ensure that there are no impacts on wildlife such as bats or nesting birds. Reference to CE-S2 Biodiversity should also be made.

11.6.6. No specific implications were identified for the SA topics of **Climate Change and Adaptation to Flood Risk, Coast or Housing**.

11.6.7. **Recommendations for SE-D1 Home Based Businesses**

Recommendations	Changes
Any proposals for home working should encourage energy efficiency measures to reduce emissions from homes, and cross reference should be made to CE-S7 Design.	Accepted
As the policy relates to the use of a residential property, or the conversion of existing outbuildings within its curtilage, checks should be made to ensure that there are no impacts on wildlife such as bats or nesting birds. Reference should be made to CE-S2 Biodiversity in the supporting text preceding SE-S1 Sustainable Exmoor Economy	Accepted
The reuse of existing buildings including ancillary buildings or new outbuildings within the curtilage, could have an effect on the historic character of those buildings, and cross-reference to CE-S4 Cultural Heritage in supporting text preceding SE-S1 Sustainable Exmoor Economy should be made	Accepted

11.7. **SE-D2 Safeguarding Existing Employment Land and Buildings**

11.7.1. There is a finite supply of employment land in the National Park, and a limited supply of Greenfield land for development, so the policy approach is to safeguard existing employment sites and premises for economic uses. Any proposals that would involve the loss of employment land or buildings would not be permitted unless certain tests of viability are met and consideration is given to the reuse of the site for community uses or affordable housing.

11.7.2. The policy is strongly positive for the **Economy and Employment** and **Community and Wellbeing** as it seeks to safeguard employment sites and premises, therefore supporting employment in local communities. If it is demonstrated that the site is no longer viable for employment uses, then redevelopment for community use or affordable housing is favoured.

11.7.3. The policy is positive for **Land**, as safeguarding existing employment sites and premises reduces the need for additional new sites and premises which could reduce land-take.

- 11.7.4. A positive score was given for **Housing** as if it is demonstrated that the site is no longer viable for employment uses, then redevelopment for community use or affordable housing is favoured.
- 11.7.5. The policy is positive for **Climate Change Mitigation and Energy** as safeguarding existing employment sites and premises reduces the need for additional new sites and premises which could reduce potential emissions.
- 11.7.6. The policy was considered to be neutral for the remaining SA topics. In relation to **Landscape**, if it is demonstrated that the site is no longer viable for employment uses, then redevelopment for community use or affordable housing is favoured. This may have landscape impacts, but this would be covered by other policies in the Plan, and by SE-S1 A Sustainable Exmoor Economy, which requires proposals to be consistent with National Park purposes and GP1, which includes protection of landscape character. There is no reference to **Climate Change and Adaptation to Flood Risk**, although this would be covered by the Core Policy and other policies (CC-S1 Climate Change and CC-D1 Flood Risk) in the Plan if it was an issue. Generally economic activity on Exmoor is not large scale and does not involve major industrial processes. The impacts on **Air Quality and Water Resources** are therefore not likely to be significant. In relation to **Transport**, safeguarding existing employment sites and premises reduces the need for additional new sites and premises which could reduce the need to travel and also potential emissions. If it is demonstrated that the site is no longer viable for employment uses, then redevelopment for community use or affordable housing is favoured. This may have **Transport** implications, but these would be covered by other policies in the Plan (Chapter 10 *Achieving Accessibility for All*).
- 11.7.7. No specific implications were identified in relation to the SA topics of **Biodiversity and Green Infrastructure, Historic Environment, and Coast**.
- 11.7.8. **Recommendations for SE-D2 Safeguarding Existing Employment Land and Buildings**
- 11.7.9. No recommendations were identified.
- 11.8. **SE-S4 Agricultural and Forestry Development**
- 11.8.1. Policy SE-S4 covers agricultural and forestry development which requires planning permission.
- 11.8.2. The policy is strongly positive for **Landscape**. By its nature and location, agricultural and forestry development could have impacts on the landscape, so strict policy safeguards are included to avoid this. The policy requires proposals to have acceptable impact on landscape, the size and scale of proposals should be commensurate with need, and with appropriate siting and use of external materials. Any new buildings must be related to existing buildings. Proposals should not generate a level of activity that would have an adverse impact on the locality or the enjoyment of the National Park. A landscaping scheme may be required to reduce visual impacts. Buildings that are no longer required should be removed, and the use of conditions to tie the building to the land will be

considered which would reduce the need for new buildings in the future. Applicants would need to demonstrate very special circumstances for proposals for new buildings in isolated locations in the open countryside, and impacts on the landscape and other environmental considerations would need to be addressed.

- 11.8.3. The policy is positive for the **Economy and Employment** as it seeks to provide flexibility for necessary agricultural and forestry development, providing a functional need can be demonstrated. However, there are still restrictions on the type and scale of development that would be considered appropriate in the National Park, particularly in isolated areas, which is why the score is positive and not strongly positive. The policy is also positive for **Community and Wellbeing** as it will support local farming communities, and safeguards the amenity of other residents by requiring that proposals do not generate a level of activity that would have an adverse impact on the locality or enjoyment of the National Park.
- 11.8.4. A positive score was given in relation to the SA topic of **Land**. Overall the policy is intended to support ongoing management of land. The text refers to the protection of best and most versatile agricultural land. There is reference to the protection of soil through reducing run-off and erosion associated with new tracks. There could be some land take from new buildings and tracks.
- 11.8.5. A positive score was given for **Air Quality and Water Resources**. The policy requires proposals to not cause pollution. Specific reference is made in the text to protection of water quality through provision of covered storage for slurry. The text also refers to the design of tracks to ensure that water run-off and sedimentation of watercourses are minimised.
- 11.8.6. The policy is also positive for the **Historic Environment** and **Biodiversity and Green Infrastructure**. The policy requires proposals to have acceptable impact on cultural heritage and wildlife. There are many important historic farmsteads in the National Park, and any proposals for agricultural or forestry development should not impact on the character and setting of these heritage assets. Similarly, care needs to be taken that impacts on the wider historic landscape and heritage assets such as archaeology are avoided and cross-reference should be made to CE-S4 Cultural Heritage. The supporting text refers to impacts on sites of nature conservation including SSSIs and European sites, however cross-reference should be made to CE-S2 Biodiversity which provides comprehensive coverage of nature conservation issues.
- 11.8.7. A neutral score was given in relation to **Climate Change Mitigation and Energy** and **Climate Change and Adaptation to Flood Risk**. There is no specific reference to Climate Change and Adaptation to flood risk, although development proposals should not exacerbate flood risk, for example through large areas of hard standing and run-off. There is also no reference to the changes in agriculture and forestry that may occur due to climate change including mitigation measures such as increased demand for renewable energy including biomass, which may bring with it the need for associated buildings or facilities such as drying sheds for timber. The text also refers to the design of tracks to

ensure that water run-off and sedimentation of watercourses are minimised – these issues may be exacerbated by climate change.

11.8.8. A neutral score was given in relation to **Transport**. Transport implications are not specifically referenced. However, proposals should not generate a level of activity that would have an adverse impact on the locality or the enjoyment of the National Park, which could include traffic. Agricultural and forestry development can often involve large machinery, and impacts on existing transport infrastructure particularly historic bridges and fords should be taken into account.

11.8.9. No specific implications were identified in relation to **Housing** or the **Coast**.

11.8.10. **Recommendations for SE-S4 Agricultural and Forestry Development**

Recommendations	Changes
The policy requires proposals to have acceptable impact on wildlife and cross-reference should be made in the text to CE-S2 Biodiversity which provides comprehensive coverage of nature conservation issues	Accepted
Changes in agriculture and forestry are likely to occur as a result of climate change adaptation and flood risk or climate change mitigation and demands for renewable energy such as biomass. Cross-reference should be made in the text to Policies CC-S1 Climate Change and CC-D1 Flood Risk. Amend the policy to include consideration of flood risk	Accepted
Add reference in the supporting text to the important historic farmsteads in the National Park, and any proposals for agricultural or forestry development should not impact on the character and setting of these heritage assets. Add reference to avoidance of impacts on the wider historic landscape and heritage assets such as archaeology. Cross-refer to CE-S4 Cultural Heritage	Accepted
Specific reference should be made in the supporting text to the potential impacts on transport infrastructure and increased traffic, with cross-reference to the transport policies in Chapter 10 <i>Achieving Accessibility for All</i> .	Accepted

12. Appraisal of Draft Local Plan Policies – Chapter 9 Achieving Enjoyment for All

12.1. Overview

12.2. This Chapter covers the following Policies:

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

12.3. A summary of the scores for these Policies is given in **Table 10** (please refer to the key for the scoring system at Table 1, page 8).

Table 10 – Summary scores for Draft Policies Chapter 9: Achieving Enjoyment for All

SA topics	RT-S1	RT-D1 RT-D2 RT-D3 RT-D4	RT-D5 RT-D6 RT-D7 RT-D8	RT-D9	RT-D10	RT-D11	RT-D12	RT-D13 RT-S2
Air quality and water resources	+	0	+	+	+	+	+	+/-
Biodiversity and Green Infrastructure	+	0	+	+	+	+	+	+
				0				
Climate change and adaptation to flood risk	0	0	+	+	0	0	0	+
				0				0
Climate change mitigation and energy	+	+/-	+	+	+/-	+	+/-	+/-
Community wellbeing	+	+	0	0	+	+	++	+
							+	

SA topics	RT-S1	RT-D1 RT-D2 RT-D3 RT-D4	RT-D5 RT-D6 RT-D7 RT-D8	RT-D9	RT-D10	RT-D11	RT-D12	RT-D13 RT-S2
Economy and employment	+/-	+/-	+/-	+	+ +/-	+	+	+
Historic environment	++ +	+	+	+	+	+	+	++
Housing	0	+	0	0	0	0	0	0
Land	+	+	+	0	+	+	+	+
Landscape	+	+	++	+	+	++	+	+
Coast	+	0	0	0	0	0	0	0
Transport	+	+/-	+	+	+	+	+/-	+/-

Split cells indicate where scores have changed as a result of the SA, the bottom cell shows the original score, and the top cell shows the score following the SA

12.4. **Overall Assessment of Draft Policies Chapter 9 Achieving Enjoyment for All**

- 12.4.1. This Chapter sets out the policies relating to recreation, tourism and environmental education development which will help to increase public enjoyment and understanding of Exmoor National Park and its special qualities, reflecting the second statutory purpose of National Parks. Proposals for such developments will be supported where facilities and activities accord with the principles of sustainable tourism.
- 12.4.2. The policies are generally positive or neutral for the SA topics of **Landscape, Biodiversity and Green Infrastructure**, and **Historic Environment**, reflecting the opportunities to increasing understanding and enjoyment of the National Park’s natural and historic environment as part of tourism and recreation. However, the policies also recognise that Exmoor’s natural and historic environment is central to the prosperity of the sector, so the conservation of these assets is given high priority.
- 12.4.3. There are generally positive or neutral implications in relation to **Air Quality and Water Resources, Land, Coast, and Climate Change and Adaptation to Flood Risk**. The policies promote sustainable tourism, which includes the protection and preservation of *natural, cultural and social resources*, minimising environmental impact and resource use, and taking account of changes in climate.
- 12.4.4. The policies should also be beneficial for the local **Community and Wellbeing**. Tourism and recreation are important sectors for providing local employment and also may help to

sustain an improved range of services and facilities due to greater use of local products and services by visitors. Access to open spaces, tranquillity and the opportunities for recreation also help support health and wellbeing.

- 12.4.5. There are mixed implications for the **Economy and Employment**. Tourism and recreation are important to the local economy, and are closely linked to the attractiveness of the landscape, biodiversity and historic environment. However, proposals will only be permitted where they are compatible with National Park purposes, which would potentially preclude some types of development such as golf courses or major tourism developments. Some recreational activities are also limited as they are not considered to be appropriate in terms of the quiet enjoyment of the National Park, including motorised sporting activities and clay-pigeon shooting.
- 12.4.6. There are also mixed and uncertain implications in relation to **Climate Change Mitigation and Energy** and **Transport**. The majority of tourism and recreational activities and facilities on Exmoor are small scale, involving quiet enjoyment of the National Park including walking, cycling, and riding and so do not, on their own, negatively affect climate change emissions or transport. However, due to the rural nature of the National Park and limitations of public transport, much of the travel is by private car, and there may consequently be cumulative impacts although the policies seek to guard against this.
- 12.4.7. The following sections set out the SA assessments for each policy in more detail, including recommendations made by the SA to strengthen the draft policies, and how these have been taken on board in the draft Local Plan.

12.5. **RT-S1 Recreation and Tourism**

- 12.5.1. Tourism and associated recreation activities are recognised as the main contributors to the Exmoor economy, and the importance of tourism in Exmoor is expected to continue and increase in the long term. Policy RT-S1 is intended to support this trend, through helping to increase the awareness of the understanding and public enjoyment of Exmoor National Park and its special qualities, reflecting the second statutory purpose of National Parks. However, the Policy also recognises that Exmoor's natural environment is central to the prosperity of the sector and where irreconcilable conflicts exist between conservation and public enjoyment then conservation interest should take priority - known as the 'Sandford Principle' (see policy GP1). However, such irreconcilable conflicts very rarely occur in the National Park.
- 12.5.2. RT-S1 scored positively for **Air Quality and Water Resources**. The policy seeks to promote sustainable tourism, the definition given (based on The European Charter) includes the protection and preservation of natural, cultural and social resources, which would include air quality and water resources. The text also identifies minimising environmental impact and resource use as one of the key challenges that must be addressed to ensure that tourism is sustainable. Air quality on Exmoor is generally good, and levels of traffic are relatively stable, but emissions from traffic during peak tourism periods could result in localised deterioration, although this is unlikely to exceed air quality standards. RT-S1 (5) requires recreation or environmental development that would generate significant

transport movements to be accessible by sustainable travel modes, and cross-references to AC-S1 Sustainable Transport. There is no reference to water conservation, although the influx of visitors during the tourism season could put pressure on water resources.

- 12.5.3. RT-S1 scored positively for **Biodiversity and Green Infrastructure, Landscape and the Coast**. As identified above, the policy seeks to promote sustainable tourism, and the definition given (based on The European Charter) includes the protection and preservation of natural resources which would include wildlife and landscape. The text also refers to the Sandford Principle, where the protection of natural beauty and wildlife would take precedence over promoting enjoyment of National Parks if there was an irreconcilable conflict between the two statutory purposes. The text recognises that the natural environment including wildlife and landscape (including the coast) is a major attraction for visitors. The policies aim to ensure that sports and recreational activities are compatible with landscape and wildlife, and promote opportunities to enhance green infrastructure. Developments, including change of use, will have to be in keeping with conservation of the natural environment of the National Park. The policy requires proposals to be consistent with policy GP1 (which refers back to the statutory purposes of natural beauty and wildlife); and to not adversely affect the special qualities, solely or cumulatively; although landscape, the coast and wildlife are not specifically mentioned. The policy also encourages significant environmental enhancements, which would include wildlife and landscape.
- 12.5.4. RT-S1 scored positively for **Historic Environment**. Again, the definition of sustainable tourism includes the protection and preservation of natural, cultural and social resources, which would include cultural heritage. The Sandford Principle would give precedence to the protection of cultural heritage over promoting enjoyment of the National Park if there was an irreconcilable conflict between the two statutory purposes. The focus is on promoting sustainable tourism and recreation that is compatible with the National Park's special qualities including cultural heritage. The text recognises that cultural heritage is a major attraction for visitors. The policies aim to ensure that sports and recreational activities are compatible with cultural heritage. The policy requires proposals to be consistent with policy GP1 (which includes cultural heritage); and do not adversely affect the special qualities (including cultural heritage), solely or cumulatively; although cultural heritage is not specifically mentioned.
- 12.5.5. RT-S1 also scored positively for **Climate Change Mitigation and Energy**, as this is recognised as one of the key challenges that must be addressed if tourism is to be sustainable. The policy supports re-use of buildings and sustainable modes of transport which will both help to reduce greenhouse gas emissions.
- 12.5.6. RT-S1 scored positively for **Community and Wellbeing**. Another key challenge in relation to sustainable tourism is to make holidays accessible for all and to enhance community prosperity and quality of life. Tranquillity and quiet enjoyment are promoted, which are important for people's wellbeing and quality of life. Tourism development may help meet identified needs that are not provided by existing settlement facilities and benefit health and wellbeing (e.g. swimming pools). Tourism can bring an improved range of services and facilities due to greater use of local products and services by visitors. Environmental

educational facilities are encouraged, which will benefit local schools and support wellbeing of children from e.g. inner city areas.

- 12.5.7. RT-S1 scored positively for **Land** as the policy encourages the reuse of traditional buildings where this accords with design principles, and enables the improvement of existing facilities including through restoration. These will both reduce the need for development on greenfield sites.
- 12.5.8. RT-S1 scored positively for **Transport** as it promotes safe access, walking, cycling, horse riding and public transport and supports opportunities to enhance the access network including provision of new access. It also requires that the use and intensity of sports and recreation should be compatible with rights of way. It requires development that would generate significant transport movements to be accessible by sustainable transport modes and a Travel Plan.
- 12.5.9. There are both positive and negative implications of RT-S1 for the **Economy and Employment**. The text recognises the importance of the tourism sector for local economy and jobs. Tourism can bring benefits for jobs and the local economy including greater use of local products and services by tourism businesses. The key challenges that must be addressed if tourism is to be sustainable include improving the quality of tourism jobs and reducing the seasonality of demand. The aim of the policy is to increase the diversity of visitor accommodation including through farm diversification, as well as supporting the improvement of existing facilities. Whilst the policy is generally positive for the economy, proposals will only be permitted where they are compatible with National Park purposes, which would potentially preclude some types of development such as golf courses or major tourism developments. Some recreational activities are also limited as they are not considered to be appropriate in the National Park including motorised sporting activities and clay-pigeon shooting.
- 12.5.10. RT-S1 was considered to be neutral in relation to **Climate Change and Adaptation to Flood Risk**. Climate change is recognised as one of the key challenges that must be addressed if tourism is to be sustainable. However, there is no specific reference to adaptation issues or flood risk. Climate change will have implications for the tourism and recreation sectors, including impacts on infrastructure such as flood risk at camping and caravan sites, or erosion of footpaths. Changes in weather patterns will also affect visitor numbers coming to the National Park. These issues therefore need to be reflected in the supporting text, and a cross reference made to Chapter 6 *Responding to Climate Change*.
- 12.5.11. The policy does not directly relate to **Housing**, although the recreation and tourism sector has an impact on the availability of affordable housing due to the high demand for accommodation. This is not something that can be directly controlled through planning, although the DM policies cover issues relating to change of use (from house to hotel for example). RT-S1 requires proposals to contribute towards a sustainable future for Exmoor's local economy and communities.

12.5.12. **Recommendations for RT-S1 Recreation and Tourism**

Recommendations	Changes
Add reference in the text to the potential transport implications of tourism / recreation development including traffic, and the need to encourage sustainable modes of transport, in support of RT-S1	Accepted
Add reference in the text to water conservation, particularly relating to increased demand arising from tourism	Accepted
Amend the text to read ‘Developments, including change of use, will have to be in keeping with conservation of the natural environment <i>and cultural heritage</i> ’ of the National Park’	Accepted
Add cross-reference to CE-S2 (Biodiversity) and CE-S4 (Cultural Heritage) to ensure that reuse of existing buildings and farm diversification is compatible with the heritage value of the buildings and any existing wildlife interest	Accepted
Amend text to read ‘where traditional buildings are not available or suitable <i>due to their historic or biodiversity interest</i> ’	Accepted
Amend RT-S1 (i) to read ‘The re-use of existing traditional buildings will be supported where the proposal accords with design principles set out in CE-S7 <i>and protection of biodiversity and cultural heritage set out in CE-S2 and CE-S4</i>	Changed The Policy has been amended to refer to CE-S7 Design and CE-S5 Principles for the Conversion or Structural Alteration of Traditional Buildings
Add a reference in supporting text to climate change adaptation and flood risk and cross-reference to Chapter 6 <i>Responding to Climate Change</i> and policies CC-S1 Climate Change and CC-D1 Flood Risk	Accepted

12.6. **Policies RT-D1 Serviced Accommodation, RT-D2 Staff Accommodation, RT-D3 Safeguarding Serviced Accommodation and RT-D4 Non-Serviced Accommodation**

12.6.1. Policy RT-D1 relates to serviced accommodation, (more generally referred to as guesthouses and hotels) which forms a considerable proportion of the visitor accommodation available in the National Park. The policy covers change of use of existing buildings into serviced accommodation, based on the results of extensive consultation which identified that this was suitable in many locations across the National Park. Limited extensions are also allowed. Policy RT-D2 deals with requirements for staff

accommodation where alternative accommodation cannot be found in the local area, or be provided within the hotel premises. Policy RT-D3 seeks to safeguard existing serviced accommodation, due to many such facilities being lost to residential use. The policy seeks to limit change of use from serviced accommodation to other commercial use. However, it also aims to encourage new guest houses/hotels to come forward through change of use from residential, by allowing this to revert back to residential at some point in the future. Policy RT-D4 covers non-serviced, or self-catering accommodation. There are a wide range of holiday homes available within the National Park, although this has caused problems for some local communities particularly in popular holiday destinations, as it reduces the availability of local housing and can also affect the vitality of local communities during the out-of-season period. Whilst the National Park Authority cannot directly control or influence the use of existing open market homes as holiday cottages, the policy does seek to control the change of use and conversion of existing buildings to holiday accommodation and restrict the development of new units.

- 12.6.2. The policies were considered to be positive in relation to **Community and Wellbeing**, as they seek to retain existing and encourage new serviced accommodation, which often provides a social function, for example providing a public bar, function room or skittle alley. The running of guesthouses is often a lifestyle choice and so the ability to revert back to residential use (for example if the owners wish to retire) without the requirement for planning permission is positive, although this should be reflected in the supporting text. Policy RT-D4 could also benefit local communities through allowing the conversion of non-serviced accommodation that is not longer needed or viable into local need housing.
- 12.6.3. The policies were considered to be positive in relation to **Housing**. Policy RT-D2 allows for the provision of accommodation for staff where this cannot be provided elsewhere in the locality. RT-D3 Safeguarding Serviced Accommodation allows change of use to residential dwellings where it has been demonstrated that continued use as serviced accommodation is not viable, and cross-refers to HC-S1 Housing. It also allows change of use to residential where it can be demonstrated that it was formally a single residential dwelling. RT-D4 allows for the conversion of non-serviced accommodation that is not longer needed or viable into local need housing.
- 12.6.4. The policies were considered to be positive in relation to **Landscape and Land**. The policies are primarily about re-use of existing buildings, which will avoid landscape impacts of new development and land-take. Any extensions are similarly expected to be subservient to the existing buildings, and change of use should not result in significant alteration. Policies RT-D1 and RT-D4 require proposals to be compatible with landscape character. RT-D4 requires no adverse impacts on tranquillity and local amenity.
- 12.6.5. The policies were considered to be positive in relation to **Historic Environment**. Many hotels and guesthouses on Exmoor have a historic provenance. The supporting text requires that change of use protects cultural heritage, cross-referencing to CE-S4, CE-D3 and CE-S7 Design and Sustainable Construction Principles. RT-D1 seeks to conserve and enhance the traditional character, appearance and setting of the building. RT-D1 constrains significant alteration or extension. RT-D4 allows change of use where it accords with cultural heritage and refers to CE-S4 Cultural Heritage. RT-D4 does not allow

conversion of the whole complex of traditional farm buildings, to protect the historic character of the buildings.

- 12.6.6. There were considered to be both positive and negative implications in relation to **Climate Change Mitigation and Energy**. The policies are primarily about change of use, which is positive from a climate change mitigation perspective as this uses existing buildings with embodied energy, without requiring new construction. However, the provision of increased accommodation could result in increased emissions from energy use, although this is not controlled by planning. There could also be additional transport movements, but this would be covered by Policies RT-S1 and C18. Policies RT-D1 and RT-D2 and RT-D4 refer back to policy CE-S7 which covers sustainable construction.
- 12.6.7. There are also positive and negative implications for **Economy and Employment**. The policies are encouraging to new serviced (RT-D1) and non-serviced (RT-D4) accommodation, and recognise the need for staff accommodation in appropriate circumstances (RT-D2), reflecting the importance of tourism to the economy. RT-D3 Safeguarding Serviced Accommodation seeks to retain an employment or business use and only allows change of use to other uses where it has been demonstrated that continued business use is not viable. RT-D2 requires that any change of use from serviced accommodation should in the first instance be to another business or employment use. RT-D4 allows small scale extensions and alterations to improve the quality and viability of existing non-serviced accommodation. However no new built units of holiday let accommodation will be permitted, which will restrict economic opportunities. Similarly, RT-D1 only refers to change of use of existing buildings, the supporting text highlights that no new build will be allowed, as consultation demonstrated there was sufficient opportunity with existing buildings.
- 12.6.8. There are mixed implications in relation to the SA topic of **Transport**, as the policies are primarily about change of use, and although there could be additional transport movements arising as a result, this would be covered by RT-S1. Any change of use to serviced (RT-D1) or non-serviced (RT-D4) accommodation would need to demonstrate that traffic generation can be accommodated by the local road network without adversely affecting road safety and capacity. However the policies are not consistent in relation to traffic and parking, and should cross-refer to Chapter 10 Achieving Accessibility for All.
- 12.6.9. For the remaining SA topics, a neutral score was given. The policies are primarily about change of use, and do not have any direct implications for **Air Quality and Water Resources**. There could be some implications of a change of use to a large hotel for water quality in relation to sewage, but this would be dealt with by policy CC-D6 Sewerage. Similarly, as the policies are primarily about change of use, they were not assessed to have any direct implications for **Biodiversity and Green Infrastructure**. RT-D1 and RT-D4 refer back to CE-S7 Design which covers any potential biodiversity constraints, e.g. bats in the roof. There are also no direct implications for **Climate Change and Adaptation to Flood Risk** as the policies restrict new development and focus on change of use. There could be circumstances where existing buildings are in flood risk zones and would not be appropriate for conversion to tourism accommodation, but this would be covered by CC-D1 Flood Risk. The policies do not have any direct implications for the **Coast**.

12.6.10. Recommendations for Policies RT-D1 Serviced Accommodation, RT-D2 Staff Accommodation, RT-D3 Safeguarding Serviced Accommodation and RT-D4 Non-Serviced Accommodation

Recommendations	Changes
Amend RT-D1 (3) to read ‘the design layout of access and parking requirements are compatible with landscape character <i>and built heritage</i> [AC-S1]	Accepted
Amend RT-D2 (i) and RT-D3 safeguarding serviced accommodation to cross–refer to CE-S4 cultural heritage to ensure that change of use is compatible with the cultural heritage of the existing building	Accepted
Add a cross reference in RT-D4 (5) to AC-S3 Traffic Management and Chapter 10 Achieving Accessibility for All	Accepted
Look at consistency between policies RT-D1 (3) and (5) and RT-D4 (4) in relation to parking and traffic	Accepted

12.7. RT-D5 Tented Camp Sites, RT-D6 Camping Barns, RT-D7 Certificated Caravan And Touring Caravan Sites, RT-D8 Static Caravan Sites

12.7.1. Policies RT-D5, RT-D6, RT-D7 and RT-D8 cover a range of more affordable visitor accommodation in the National Park. Camping on tented camp sites remains a popular form of visitor accommodation on Exmoor. Policy RT-D5 allows proposals for new camp sites or small extensions to existing sites, where this is compatible with National Park purposes and provides criteria against which the provision of facilities will be assessed. Policy RT-D6 supports the provision of a network of camping barns, particularly where this can bring redundant buildings back into use, although more stringent criteria are provided for proposals in isolated locations, to protect their character. New commercial touring caravan sites and extensions to existing sites are not permitted by Policy RT-D7, as they are considered to be inappropriate within the National Park due to the significant visual impact they can have on landscape character. However, smaller certificated caravan sites (that are reserved exclusively for members of certain caravan and camping organisations) are encouraged, to help ensure that Exmoor continues to offer a diverse range of holiday accommodation. New static caravan sites are also not permitted, due to their impacts, and Policy RT-D8 provides criteria to improve the quality of existing sites.

12.7.2. The policies were considered to be strongly positive in relation to **Landscape** as a key consideration is to ensure that landscape character is protected. New tented campsites should have no adverse impacts on landscape character and visual amenity (RT-D5(2)). Conversion of existing buildings to camping barns should be consistent with their setting within the landscape, and isolated camping barns will only be allowed where this

contributes to wider landscape character (RT-D6 Camping Barns). Policy RT-D7 allows for new certificated caravan sites where these are well sited and integrated in the landscape, and access and parking does not impact on landscape character. New touring and static caravan sites will not be permitted due to impacts on landscape and replacement caravans or chalets will only be permitted where they to positively relate to landscape character (RT-D8).

- 12.7.3. Overall, the policies were considered to be positive in relation to **Air Quality and Water Resources**. There are not likely to be significant implications in relation to air quality, as this type of accommodation is low impact, and although emissions from increased traffic could impact on air quality, it is not likely that these increased would be significant. RT-D5 Tented Camp Sites may require facilities such as toilet/shower blocks, laundry facilities and so on which will require water and sewerage facilities, and whilst this may have implications for water quality, this would be dealt with through CC-D6 Sewerage. RT-D6 recognises that camping barns in isolated locations are likely to require minimal facilities and should only be provided on site where this can be done sustainably e.g. through composting toilets. RT-D7 Certificated Caravan Sites requires that certificated sites meet basic requirements including drinking water, disposal facilities for chemical closets. No new touring sites will be permitted.
- 12.7.4. The policies scored positively for **Biodiversity and Green Infrastructure**. Policy RT-D5 on tented camp sites requires careful siting of extensions – this should include consideration of any existing wildlife interest. It also encourages environmental enhancement, which could include biodiversity enhancement. Policy RT-D6 camping barns includes consideration of biodiversity interests and cross references to CE-S2 Biodiversity. Policy RT-D8 static caravan sites allows relocation of existing pitches to less sensitive areas to provide environmental enhancement, and whilst this is mainly intended to provide landscape improvements, it could also include benefits to wildlife if appropriate reference is made in the text.
- 12.7.5. The policies also scored positively for **Historic Environment**. Policy RT-D5 requires that any facilities to service the campsite should be provided through conversion of existing traditional buildings, although this would need to be consistent with CE-S4 Cultural Heritage and cross-reference should be made in the policy. Where suitable traditional buildings are not available, then the policy allows for use of other buildings, including the enhancement of existing buildings and bringing redundant buildings back into viable use. Further explanatory text is required to support these aspects of the policy. Policy RT-D6 camping barns enables the change of use and alteration of traditional buildings into camping barns where this complements historic character, and cross refers to CE-S4. Policy RT-D7 allows for new certified caravan and touring caravan sites where they new permanent buildings, site excavation or other site requirements will not be required – this will help to protect any archaeology. The policy also seeks to ensure that any access and parking requirements do not adversely impact on landscape character, which should be extended to avoid impacts on the historic environment (RT-D7).
- 12.7.6. A number of existing camp sites and caravan parks are within areas of flood risk. The policies scored positively for **Climate Change and Adaptation to Flood Risk**, as they

address this by allowing extension of existing sites to relocate pitches outside flood risk areas. Policy CC-D1 would cover any proposals in areas of flood risk, although cross-reference to this policy should be made. A number of recommendations are made to ensure that there is a consistent approach to flood risk across the policies. For example, the opportunity for vulnerable sites to relocate out of flood risk areas is referred to, and cross-reference made to policy CC-D1 Flood Risk, but there is no corresponding reference in Policy RT-D5 Tented Camp Sites. Policy RT-D7 Certificated Caravan and Touring Caravan Sites does not refer to flood risk and reference should be made to avoid areas of high flood risk. RT-D8 Static Caravan Sites requires replacement caravan or chalets to avoid sites in areas with high probability of flooding.

- 12.7.7. The policies are positive in relation to **Climate Change Mitigation and Energy and Transport**. Policy RT-D6 camping barns relates to reuse of existing buildings which will reduce emissions through utilising the embodied energy of the buildings. Policies RT-D7 Certificated Caravan Sites and RT-D8 Static Caravan Sites do not allow for new or extended touring caravan sites or static caravan / chalet developments, which would avoid additional traffic, particularly large caravans, and thus will indirectly contribute to climate change mitigation by reducing emissions. The policies include requirements relating to access and parking, and the supporting text recognises that many of Exmoor's rural roads and lanes are unsuitable for large towed vehicles or motor-homes.
- 12.7.8. The policies are also positive in relation to **Land**, as camping and caravan sites are not permanent forms of development and so will not result in permanent loss of land. The policies also encourage reuse of buildings (e.g. RT-D6 for camping barns and RT-D5 for camping facilities) which will minimise requirements for land. Similarly, Policies RT-D7 Certificated Caravan Sites and RT-D8 Static Caravan Sites will minimise land-take as they do not allow for new or extended touring caravan sites or static caravan / chalet developments.
- 12.7.9. The policies were considered to have both positive and negative implications for the **Economy and Employment**. Camping and caravanning provides more affordable forms of accommodation, which is positive for the economy generally. However, Policies RT-D5 Tented Camp Sites. Policy RT-D7 Certificated Caravan & Touring Caravan Sites do not allow for new or extended touring caravan sites or static caravan / chalet developments, which could restrict economic opportunities.
- 12.7.10. The policies were considered to be neutral in relation to the remaining SA topics. As the policies deal with visitor accommodation, there are no specific implications for **Community and Wellbeing or Housing**, although the supporting text recognises that camping and caravanning provides more affordable forms of accommodation that enable people to visit and enjoy Exmoor. There are no specific references to the **Coast**, although the sensitivities of locating camping or caravan sites in coastal locations would be covered through Policy CE-S1 Landscape Character. Flood risk and coastal change is covered in CC-D1 and CC-S2. The supporting text recognises opportunities for camping barns along long distance routes such as the South West Coast Path.

12.7.11. Recommendations for Policies RT-D5 Tented Camp Sites, RT-D6 Camping Barns, RT-D7 Certificated Caravan And Touring Caravan Sites, RT-D8 Static Caravan Sites

Recommendations	Changes
Amend RT-D5 (2) Tented Camp Sites and supporting text to include consideration of biodiversity	Accepted
Add reference in supporting text to restoration of existing pitches to benefit wildlife	Accepted
Add explanatory text to support the policy approach in RT-D5 Tented Camp Sites to provision of facilities where suitable traditional buildings are not available	Accepted
Cross refer to CE-S4 cultural heritage in RT-D5 Tented Camp Sites to read 'Any facilities that may be required to service the campsite can be provided through the conversion of suitable existing traditional buildings consistent with policy CE-S7 Design and CE-S4 Cultural Heritage'	Accepted
Amend RT-D7 (2) Certificated Caravan & Touring Caravan Sites to ensure that parking or access requirements do not adversely impact on the historic environment	Accepted
Add point (4) to RT-D5 Tented Camp Sites – 'They are not located in an area at risk of flooding [CC-D1]'	Accepted
Add point (4) to RT-D7 Certificated Caravan & Touring Caravan Sites – 'They are not located in an area at risk of flooding [CC-D1]' and reference in text	Accepted
Include cross-reference to CC-D6 Sewerage in the explanatory text for RT-D5 Tented Camp Sites to ensure that any required facilities do not impact on water quality	Accepted

12.8. Policy RT-D9 Alternative Camping

12.8.1. Policy RT-D9 provides for small scale, low impact alternative camping proposals, which will provide a diversity of accommodation provision and may lead to a wider range of visitors to the National Park.

12.8.2. The policy is positive for a number of SA topics. In relation to **Economy and Employment**, it allows flexibility for diversification of land based businesses and other existing accommodation premises and will be positive for the local tourism industry. Due to the

type of accommodation, proposals are likely to have a low environmental impact including avoidance of site treatments such as excessive hard-standing, sustainable construction and the use of materials, which will minimise impacts on **Air Quality and Water Resources**. Proposals should demonstrate that the siting and landscaping strongly relate to the **Landscape** and **Historic Environment** of the area and is appropriate to its setting, and opportunities for enhancement should be considered. Proposals will be low impact due to their nature with limited facilities and emissions, helping to contribute to **Climate Change Mitigation and Energy**. Sustainable construction is encouraged. Sustainable modes of **Transport** are encouraged and minimum parking should be provided.

- 12.8.3. No specific reference is made to **Biodiversity and Green Infrastructure**, so a neutral score was given. Overall the policy is not likely to be damaging for wildlife due to the scale and nature of the types of accommodation being proposed. The policy includes reinstatement of the site to its former use if the use becomes redundant, however there could be opportunities for wildlife enhancement. There could also be opportunities for enhancement through the design and management of the site and any associated planting e.g. for screening.
- 12.8.4. A neutral score was given in relation to **Climate Change and Adaptation to Flood Risk**. There is no reference to flood risk although temporary caravans or similar are considered to be a highly vulnerable use.
- 12.8.5. The policy is neutral for **Land** as proposals are likely to be low impact, with limited treatments such as hard-standing. Sites will be restored to if the use ceases. Similarly, a neutral score was given for the **Coast**, as impacts on coastal landscape character and seascapes would be dealt with through demonstrating that the siting and landscaping strongly relate to the landscape and historic character of the area and is appropriate to its setting.
- 12.8.6. A neutral score was also given in relation to **Community and Wellbeing**. Proposals are likely to be low impact, particularly if they are well screened and are unlikely to have impacts on local communities or amenity.
- 12.8.7. No direct implications were identified in relation to the SA topic of **Housing**. Conditions will be used to restrict use to holiday use only and the structure will not be used as a permanent residence.
- 12.8.8. **Recommendations for Policy RT-D9 Alternative Camping**

Recommendations	Changes
Include consideration of biodiversity and green infrastructure in the policy both in terms of ensuring no adverse impacts on sensitive wildlife species and habitats, and the potential opportunities for enhancement that may arise, and cross-	Accepted

reference to CE-S2 Biodiversity, CE-S3 Green Infrastructure	
Reference should be made to flood risk and policy CC-D1	Accepted

12.9. **Policy RT-D10 Recreational Development**

- 12.9.1. Policy RT-D10 applies to recreational development within the National Park, and is intended to enable people to enjoy the National Park in a sustainable way consistent with RT-S1 Recreation and Tourism. The policy lists the criteria that would need to be met to enable recreational development to be permitted.
- 12.9.2. RT-D10 was considered to be positive in relation to **Air Quality and Water Resources and Transport**. The majority of recreational activities and facilities on Exmoor are small scale and dispersed, although there are large scale events such as the Ironman triathlon. Recreation and tourism activities that involve quiet enjoyment of the National Park are supported, and the supporting text reflects the importance of the rights of way and access network for recreation. However, there may be cumulative impacts arising from more intensive use or larger scale developments, for example large scale proposals could generate significant levels of traffic, which potentially would impact on air quality. Cumulative impacts on increased walking/cycling/riding could also lead to more erosion and consequent impacts on water quality from run-off and sedimentation. The policy guards against cumulative impacts and requires that the location, scale and intensity of use is appropriate in relation to environmental capacity which could include air quality and water resources, although there is no explanatory text regarding how environmental capacity would be assessed. The policy requires that there is sufficient capacity in the existing local road network to service the development as well as requiring adequate access, parking and road capacity. However there should be reference to sustainable modes of transport to be consistent with AC-S1 Sustainable Transport.
- 12.9.3. RT-D10 scored positively for **Biodiversity and Green Infrastructure**. Exmoor’s wildlife is an important draw for visitors, including wildlife watching. The supporting text recognises that recreation facilities can also provide multiple functions including wildlife habitats, which would be supported. The provision of recreational facilities is supported provided these are compatible with the special qualities which include wildlife. Recreational development is focused in or adjoining the named settlements and special justification is required for proposals to be located in the open countryside. This will help to ensure that wildlife and habitats are protected in accordance with CE-S2. Recreational activities which conflict with the National Park’s special qualities (including wildlife) are not considered appropriate although wildlife is not specifically mentioned. Golf courses and other activities such a game shooting can be damaging to wildlife through loss of habitats or disturbance. The policy requires the development to be removed and land restored to its former condition once the use ceases, which could benefit biodiversity – although the policy could be strengthened to require environmental enhancement.
- 12.9.4. Policy RT-D10 was considered to be positive in relation to **Community and Wellbeing**. It covers recreational development, which could also benefit the local community and this

should be reflected in the text. Facilities that specifically serve the needs of the local community would be assessed under HC-S7 Local Commercial Services and Community Facilities. Recreational pursuits focused on walking, cycling and so on will encourage health and wellbeing. The policy focuses recreational development in or adjoining named settlements (except where it can be demonstrated that a location in the open countryside is essential and acceptable) which would also benefit local communities.

- 12.9.5. RT-D10 scored positively for **Historic Environment**. Reuse of existing buildings is encouraged which could include traditional buildings where appropriate. The policy requires that the location, scale and intensity of use are appropriate to the environmental capacity, landscape character and visual amenity. There is no direct reference to historic environment.
- 12.9.6. RT-D10 is also positive for **Land**. Recreational development is focused in or adjoining the named settlements and special justification is required for proposals to be located in the open countryside. Reuse of existing buildings is encouraged. These will help to minimise land take. The policy also requires the development to be removed and land restored to its former condition once the use ceases.
- 12.9.7. The policy was considered to be positive for **Landscape**. The explanatory text recognises that much of the recreational activity on Exmoor is based on people enjoying the special qualities including landscape and natural beauty. Proposals need to ensure that the location, scale and intensity of use are appropriate to the environmental capacity, landscape character and visual amenity (supporting text and RT-D10). Recreational development is focused in or adjoining the named settlements and special justification is required for proposals to be located in the open countryside. Reuse of existing buildings is encouraged. These will help to maintain landscape character. Proposals for recreational activities particularly noisy pursuits and activities that conflict with the special qualities including through visual intrusion and impacts on tranquillity are not considered to be appropriate. The particular visual impacts of game shoots are identified.
- 12.9.8. There are both positive and negative implications for **Climate Change Mitigation and Energy**. The majority of recreational activities and facilities on Exmoor are small scale and dispersed, although there are large scale events such as the Ironman triathlon. There may be cumulative impacts arising from more intensive use or larger scale developments. For example large scale proposals could generate significant levels of traffic, which potentially would lead to increased greenhouse gas emissions. However, the policy guards against cumulative impacts and requires that the location, scale and intensity of use is appropriate in relation to environmental capacity although there is no explanatory text regarding how environmental capacity would be assessed.
- 12.9.9. There are also potentially positive and negative implications for **Economy and Employment**. The supporting text recognises that recreational pursuits are important in supporting the local economy through tourism and providing employment including apprenticeships and training, although this is not reflected in the policy. Some recreational activities are not considered to be appropriate in the National Park due to their impacts e.g. noise or landscape such as golf courses, motor sports, which would restrict economic

opportunities. However, such activities would also negatively impact on tourism which would also have a negative effect on the local economy and employment. Recreational proposals that support a sustainable local economy would be supported, and the RT-D10 could be considered to be positive overall for this SA topic if this is reflected in the policy.

12.9.10. RT-D10 was considered to be neutral in relation to **Climate Change and Adaptation to Flood Risk** and the **Coast**. The opportunity for recreational facilities to also provide multiple functions such as flood risk mitigation is recognised. There may be a need for recreational facilities to be adapted due to changing weather patterns and climate change; this would be covered by the policies in Chapter 6 *Responding to Climate Change*. There is no specific reference to the coast, although this is one of the assets that people come to enjoy. The coast would be covered under the special qualities.

12.9.11. No specific implications were identified for the SA topic of **Housing**.

12.9.12. **Recommendations for Policy RT-D10 Recreational Development**

Recommendations	Changes
Include an explanation of environmental capacity in the supporting text, which could include air quality and water resources	No changes made to the text, this will be explained in the glossary
Amend the supporting text to specifically include impacts on biodiversity in relation to activities that conflict with the National Park's special qualities.	Accepted
Amend the final point in RT-D10 to encourage environmental enhancement when the land is restored	Accepted
Add historic environment in the list of issues to be considered in relation to environmental capacity and appropriateness of development	Accepted
Amend RT-D10 bullet to read 'There is adequate access, <i>including by sustainable modes of transport</i> , parking can be accommodated...'	Accepted
Amend RT-D10 to read 'Proposals for recreational development <i>that support a sustainable local economy</i> will be permitted where...'	Accepted

12.10. **Policy RT-D11 Equestrian Development**

- 12.10.1. Equestrian activities are popular on Exmoor and are important for local communities, visitors and the local economy. However, the proliferation of equipment and facilities associated with keeping horses such as stabling, fencing and ménages, can have a detrimental impact on landscape character and the access network if not managed carefully. The policy sets out the criteria that will guide equestrian development on Exmoor.
- 12.10.2. The policy was strongly positive in relation to the SA topic of **Landscape** as it requires equestrian development to be consistent with National Park purposes and CE-S1 Landscape Character. Development should be sensitively sited, of appropriate scale and design and be appropriate to the landscape setting, and it should not affect amenity of the surrounding area or neighbouring properties including visual intrusion and light pollution.
- 12.10.3. A positive score was given in relation to **Community and Wellbeing** and **Economy and Employment**. There is recognition of the importance of equestrian activities to the local economy and equestrian development can also fit in well with farming activities to help diversify rural economies. Riding is also a traditional activity for local communities and can support wellbeing through improved access to leisure opportunities and healthy activities.
- 12.10.4. The policy was considered to be positive for **Biodiversity and Green Infrastructure** and **Historic Environment**, as it requires proposals to be consistent with National Park purposes. The policy provides consideration of nature conservation through the regulation of horse numbers where this may impact on nature conservation. An equestrian management plan should include protection of trees and hedges and the management of invasive species such as ragwort. Reuse of existing buildings should be consistent with CE-S5 Conversion of Traditional Buildings.
- 12.10.5. A positive score was given for the SA topic of **Land** and **Air Quality and Water Resources**. Equestrian development can fit in well with farming activities to help diversify rural economies, and although there could be loss of agricultural land to equestrian use, this use can be reverted back to agriculture. The policy encourages the reuse of existing buildings, which will reduce the need for land take. Equestrian management plans are required which include managing grazing, waste, soil structure and so on, which will help to encourage good land management and prevent pollution. The supporting text requires horse waste to be stored and disposed of responsibly to avoid ground and water pollution (CC-S5 Pollution). However the policy does not specifically relate to impacts on the natural environment (it refers to amenity).
- 12.10.6. The policy is also positive for **Climate Change Mitigation and Energy** and **Transport**. The intention is for horse related development to be close to the property it is intended to serve, reducing the need to travel and consequently emissions. Proposals are required to minimise impacts from increased traffic. The reuse of existing buildings is encouraged, which will contribute to climate change mitigation through making the best use of embodied energy in existing buildings. There could be impacts on the rights of way network, but proposals are required to be well related to suitable networks of equestrian routes that are capable of supporting the additional usage.

12.10.7. The policy was considered to be neutral in relation to **Housing**. Proposals should not generate the need for a separate dwelling that cannot be met by an existing dwelling or through the conversion of a traditional building.

12.10.8. No specific implications were identified for **Climate Change and Adaptation to Flood Risk and Coast**.

12.10.9. **Recommendations for Policy RT-D11 Equestrian Development**

Recommendations	Changes
Amend policy to read ' do not adversely affect the <i>natural environment</i> or amenity....'	Accepted

12.11. **Policy RT-D12 Access Land and Rights of Way**

12.11.1. Walking, cycling and horse-riding are popular recreational activities on Exmoor, utilising the extensive access network. The access network is defined as including Public Rights of Way, access land, statutory and permitted cycle routes, Policy RT-D12 safeguards the access network by ensuring that development proposals will not adversely affect it, and providing criteria for proposals that may affect the network to ensure that impacts are avoided or mitigated, users interests and protected, and enhancement is achieved.

12.11.2. RT-D12 scored positively for **Air Quality and Water Resources**. The policy promotes walking as a popular recreational activity on Exmoor, along with cycling and horse riding. The extensive access network provides an excellent basis for these activities, which are often cited as the main reason for visiting the National Park, and also help in promoting the enjoyment of the National Park and therefore supporting the second purpose. Enjoying Exmoor through sustainable modes of travel such as walking, cycling and horse-riding will reduce emissions from transport, although there will still be emissions from travel to the National Park. Air and water quality are generally good on Exmoor, and are not likely to be adversely impacted by the policy.

12.11.3. RT-D12 also scored positively for **Biodiversity and Green Infrastructure and Historic Environment**. The policy requires that the access network is safeguarded and that development proposals do not adversely affect biodiversity or historic environment. It is not clear why biodiversity and historic environment are referenced in this context, as the policy is about safeguarding the access network and any impacts on the biodiversity or historic environment interest of the network would be covered by CE-S2 (Biodiversity) and CE-S4 (Cultural Heritage). There is no explanation in the text to explain why this bullet is included or about the biodiversity and historic environment interest of the access network. The policy requires that any proposals which adversely affect the access network should demonstrate that any harm will be kept to a minimum, which could include any impacts on biodiversity or historic environment. The access network forms an important component of the green infrastructure on Exmoor, and cross-reference should be made to CE-S3 Green Infrastructure and CE-D2 Green Infrastructure Provision. Policy RT-D12

penultimate bullet point includes demonstrating that opportunities have been sought to provide linkages between routes, which will also help strengthen the Green Infrastructure network. The policy also requires safeguarding the condition of the access network and its character and appearance, which would include historic environment.

- 12.11.4. RT-D12 was considered to be positive in relation to **Community and Wellbeing**. The access network is a resource for local communities as well as those visiting the National Park. This should be reflected in the supporting text. The benefits of walking, cycling etc for healthier living are recognised, which will benefit local residents and visitors alike. The policy refers to 'users interests' which are defined in the supporting text as including the physical use and understanding, enjoyment and experience of the access network including views and tranquillity. This could be expanded to identify the opportunities for users of all abilities and from different backgrounds to enjoy the access network. The supporting text states that where proposals are likely to result in an increase in the intensity of vehicular use on shared access routes, applicants will need to demonstrate that the safety, ease of use and enjoyment of the access network by all users will be maintained.
- 12.11.5. The policy was also considered to be positive for **Economy and Employment**. The supporting text recognises the important influence the access network has on the number of visitors to Exmoor, and its contribution to the local economy of the area including for a significant number of local businesses. It also identifies the economic benefits from the existing access land. The policy seeks to safeguard the access network, maintaining its value to the local economy.
- 12.11.6. RT-D12 was positive for **Land and Landscape**. The policy aims to safeguard the access network and its condition, character and appearance which will promote sustainable use of land and help to protect landscape character. There should be further explanation of landscape character in the text. User interests are defined as including enjoyment of views and tranquillity. Increasing recreational pressure resulting from greater intensity of use of the access network could be detrimental for landscape character and tranquillity, particularly from certain uses such as more active sports or motorised vehicles. The policy requires that any proposals which adversely affect the access network should demonstrate that any harm will be kept to a minimum, which could include any impacts on landscape character.
- 12.11.7. There were both positive and negative implications in relation to **Climate Change Mitigation and Energy and Transport**. The policy promotes walking as a popular recreational activity on Exmoor, along with cycling and horse riding. The extensive access network provides an excellent basis for these activities, which are often cited as the main reason for visiting the National Park, and also help in promoting the enjoyment of the National Park and therefore supporting the second purpose. The supporting text identifies the access network as providing a means of sustainable transport and the important role it plays in contributing to the sustainable transport infrastructure in the National Park. The policy is specifically designed to safeguard public rights of way, and could indirectly improve opportunities for safe horse riding, cycling and walking as an alternative to car travel. Enjoying the National Park through sustainable modes of travel such as walking, cycling and horse-riding will reduce emissions from transport. However, there will still be

emissions from travel to Exmoor, and the popularity of walking etc as recreational activities will contribute to congestion and traffic particularly during the tourism season.

12.11.8. RT-D12 was considered to be neutral in relation to **Climate Change and Adaptation to Flood Risk and Coast**. Whilst there may be an increased need for maintenance of the access network as a result of climate change, as identified in the supporting text, there are unlikely to be planning implications arising from this and it is not specifically covered in the policy. There may be need to divert paths as a result of coastal change, however there are unlikely to be planning implications arising from this. The policy requires any diversions and/or compensatory land to be of equal or better quality.

12.11.9. There were not considered to be any direct implications for **Housing**.

12.11.10. **Recommendations for Policy RT-D12 Access Land and Rights of Way**

Recommendations	Changes
Add cross reference to CE-S3 and CE-D2 Green Infrastructure Provision in supporting text and amend penultimate bullet of policy RT-D12 to read 'opportunities have been sought to provide linkages between routes, and strengthen the green infrastructure network'	Accepted
Add explanation in the text about the biodiversity interest of the access network	Accepted
Add reference in the supporting text to the opportunities for local communities to enjoy the access network as well as visitors	Accepted
Add reference to social inclusion in the supporting text to ' <i>opportunities for users of all abilities and from different backgrounds to enjoy the access network'</i>	Accepted
Add explanation in the text about the historic environment interest of the access network	Accepted
Add explanation of landscape character in the text	Accepted

12.12. **Policy RT-D13 Safeguarding Land Along Former Railways and RT-S2 Reinstatement of the Lynton and Barnstaple Railway**

12.12.1. RT-D13 relates to the safeguarding of land along the line of the former West Somerset Mineral line and the Lynton and Barnstaple Railway for their recreation and historic value

and their potential for sustainable modes of travel. RT-D14 sets out the criteria under which proposals for reinstatement of the Lynton and Barnstaple Railway would be considered.

- 12.12.2. The policies were considered to be strongly positive in relation to the **Historic Environment**. The safeguarding of the routes is intended to protect them as historic assets valuable to the cultural heritage of the National Park. Any reinstatement of the Lynton and Barnstaple Railway should replicate the former railway using the original route and the siting and design of the associated structures and buildings, reflecting the traditional character of the original railway. Sustainable construction materials should be used unless they compromise the historical accuracy and appearance of the former railway. If the use of the reinstated railway becomes redundant the rail line will be safeguarded as an important linear access route for its recreational and historic value.
- 12.12.3. The policies are positive for **Economy and Employment** and **Community and Wellbeing** as safeguarding the routes provides opportunities to improve access for all, both as potential rights of way routes or as a reinstated railway, which could also boost tourism. The reinstatement of the Lynton and Barnstaple Railway could be positive in generating employment and supporting local contractors and suppliers. Safeguarding the routes also improves access to recreation, leisure and learning and cultural opportunities.
- 12.12.4. A positive score was given in relation to **Landscape** and **Biodiversity and Green Infrastructure**. The supporting text requires the National Park Authority and local authorities to work together to ensure that any proposal for reinstatement of Lynton and Barnstaple Railway protects the National Park's landscape character and its setting. Any potential impacts on coastal landscape character would be considered as part of the overall implications for landscape character. The design of all aspects of a proposal should reflect the traditional character and appearance of the original railway and ensure that the proposed development is integrated in its setting. Landscaping should be incorporated as part of the proposal to conserve and enhance the National Park. The supporting text refers to the importance of former railway lines as wildlife corridors and providing links between habitats, which can also be part of the green infrastructure network, and requires proposals to take into account potential wildlife issues including impact on protected species along the route and associated buildings, with reference to CE-S2 Biodiversity.
- 12.12.5. The policies are also positive for **Land**. RT-D13 is intended to safeguard the routes –as linear access routes, or in the case of the Lynton and Barnstaple Railway, for reinstatement of the railway itself. Sustainable construction methods are encouraged and the supporting text requires waste and resource use to be minimised through the reuse of buildings (which will reduce land take), materials and site waste. Parking provision is constrained and permanent peak parking demand will not be provided for, which will also limit required land take.
- 12.12.6. There could be mixed implications in relation to **Climate Change Mitigation and Energy, Transport**, and **Air Quality and Water Resources**. The restoration of the Lynton & Barnstaple railway line could be beneficial in terms of providing more sustainable forms of travel. However, the generation of traffic to the railway could be significant, and any

impacts on air quality and carbon emissions would need to be considered as part of a detailed application. The policy requires a travel plan to be produced and to incorporate measures to enable safe access by walking, cycling and public transport and to minimise traffic generation and therefore emissions, cross-referring to CE-S1 Sustainable Transport. The policy encourages reuse of existing buildings, which will be positive in terms of embodied energy. The supporting text encourages use of sustainable construction materials. The supporting text refers to the avoidance of pollution and cross-refers to CC-S5 Pollution, and there are not likely to be significant impact on water quality, except perhaps during any construction works.

- 12.12.7. A neutral score was given in relation to **Housing**. The policy requires that proposals should not generate the need for a new build dwelling. Any dwelling proposals should accord with housing policies in Chapter 7 *Achieving a Thriving Community*. The safeguarding of the Lynton & Barnstaple railway route on the Proposals map excludes land within the footprint of residential dwellings in existence when the Plan was adopted.
- 12.12.8. A neutral score was also given to Climate Change Adaptation. Any reinstatement of the line would need to consider implications of flood risk (for example the original Lynton & Barnstaple Railway line around the Parracombe bend was washed out by the 1952 flood). Cross-reference should be made in the text to CC-S1 Climate Change and CC-D1 Flood Risk.
- 12.12.9. No specific implications were identified in relation to the SA topic of the **Coast**. Any potential impacts on coastal landscape character would be considered as part of the overall implications for landscape character.
- 12.12.10. **Recommendations for Policy RT-D13 Safeguarding Land Along Former Railways and RT-S2 Reinstatement of the Lynton and Barnstaple Railway**

Recommendations	Changes
Cross-reference should be made in the text to CC-S1 Climate Change and CC-D1 Flood Risk.	Accepted

13. Appraisal of Draft Local Plan Policies – Chapter 10 Achieving Accessibility for All

13.1. Overview

13.2. This Chapter covers the following Policies:

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

13.3. A summary of the scores for these Policies is given in **Table 11** (please refer to the key for the scoring system at Table 1, page 8).

Table 11 – Summary scores for Draft Policies Chapter 10: Achieving Accessibility for All

SA topics	AC-S1	AC-S2 AC-D1	AC-S3 AC-D2 AC-D3	AC-S4 AC-D4 AC-D5 AC-D6
Air quality and water resources	+	+	+	+/-
Biodiversity and Green Infrastructure	+	+	+	+
	0		+/-	
Climate change and adaptation to flood risk	0	+	+	+
	+	0	0	0
Climate change mitigation and energy	++	+	+	+/-
Community wellbeing	+	+	+	++
Economy and employment	+	+/-	-	++
Historic environment	0	++	+	++
				+
Housing	+	+	+	0
Land	0	+	+	+
Landscape	0	++	+	++
Coast	0	+	+	+
	+	0	0	
Transport	++	++	++	+/-

Split cells indicate where scores have changed as a result of the SA, the bottom cell shows the original score, and the top cell shows the score following the SA

13.4. **Overall Assessment of Draft Policies Chapter 10 Achieving Accessibility for All**

- 13.4.1. The transport policies in this Chapter set out how Exmoor National Park Authority will work with Somerset and Devon County Councils as the Highways and Transport Authorities and transport providers to encourage sustainable transport for residents and visitors, supporting public and community transport services, accessibility, opportunities for walking, cycling and horse riding, and minimising emissions of greenhouse gas emissions. They set out the approach to transport infrastructure, transport and accessibility requirements for new development, traffic management and parking provision.
- 13.4.2. Chapter 10 also includes policies relating to improvements to the telecommunications network and electricity infrastructure, recognising the vital role that communications networks have for sustainable economic growth and the provision of community services and facilities. The policies seek to support improvements whilst ensuring that the conservation of the National Park's natural beauty, landscape, wildlife and cultural heritage is not compromised.
- 13.4.3. The policies are mainly very positive in relation to the SA objectives for **Transport and Community and Wellbeing, Housing, Climate Change Mitigation and Energy, Land, Air Quality and Water Resources** as they encourage travel by sustainable means of transport, whilst recognising the difficulties associated with this in a dispersed rural area such as Exmoor. The policies encourage a shift in priority towards pedestrians, cyclists, horse riders and public transport and also opportunities for low carbon travel including installation of electric charging points. The policies support the ongoing provision of public transport services, but given cuts in public funding, alternatives such as demand-responsive community transport initiatives and car-sharing clubs are also encouraged. Enhanced access to the public rights of way network is also encouraged. There are some areas of the National Park where traffic is an issue, particularly during the peak holiday season, and the policies require measures to minimise the adverse impacts of traffic in these circumstances. The telecommunications policies could have mixed effects, as the promotion of broadband and ICT will enable increased home working thus reducing the need to travel, as well as providing potential alternative ways of accessing services. However there is already an increase in transport movements in terms of delivery vans from internet shopping (as highlighted in AC-S1) which are likely to be exacerbated as a result.
- 13.4.4. The policies are mainly positive for the SA topics of **Landscape, Biodiversity and Green Infrastructure, and Historic Environment**, and seek to protect the character of Exmoor's roads, historic bridges and fords. Highway maintenance or improvement works are expected to be carried out to the highest environmental standards in keeping with local character and using materials and finishes appropriate to the built environment.

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

13.4.6. The following sections set out the SA assessments for each policy in more detail, including recommendations made by the SA to strengthen the draft policies, and how these have been taken on board in the draft Local Plan.

13.5. **Policy AC-S1 Sustainable Transport**

13.5.1. AC-S1 sets out how the National Park Authority aims to encourage sustainable modes of transport, working with Highways and Transport Authorities, transport providers, local communities, and where appropriate, neighbouring authorities. It supports sustainable transport for residents and visitors, including public and community transport services, accessibility, opportunities for walking, cycling and horse riding, low carbon travel, and improved information provision.

13.5.2. AC-S1 scored strongly positive for the SA topic of **Transport**, as would be expected as the policy is designed to support sustainable transport, and covers all the criteria in the SA framework. It also scored strongly positive for **Climate Change Mitigation and Energy**, with one of the stated purposes of the policy being to minimise emissions of greenhouse gases. The explanatory text recognises that transport is a significant contributor to greenhouse gas emissions, and links to Chapter 6 *Responding to Climate Change*. The policy promotes alternatives to the car, including public transport and demand responsive transport. It also encourages electric vehicles and low carbon travel, and recognises the role of ICT in reducing the need to travel and supporting a low carbon future.

13.5.3. AC-S1 scored positively in relation to **Air Quality and Water Resources**. One of the purposes of the policies is to minimise emissions of greenhouse gases, and the explanatory text recognises that transport is a significant contributor to greenhouse gas emissions, and links to Chapter 6 *Responding to Climate Change*. There is no specific reference to air quality, although transport and traffic levels in particular, are identified in the Scoping report. However, this goes on to conclude that air quality is generally good in the National Park, and traffic levels are relatively stable, and it is not expected that air quality standards are likely to be generally exceeded.

13.5.4. AC-S1 scored positively in relation to **Climate Change and Adaptation to Flood Risk**. The need for adaptation measures in relation to transport infrastructure is identified in the supporting text and Policy AC-S1. However, this is more relevant to AC-S2 Transport infrastructure and if the recommendation is adopted, AC-S1 would be neutral. Similarly, there is no specific reference to the **Coast**, although coastal change could impact on some

transport infrastructure such as the road at Porlock Weir. If the recommendation to move adaptation issues to AC-S2, Policy AC-S1 would be neutral.

- 13.5.5. AC-S1 is positive for **Community and Wellbeing**, and **Economy and Employment**, recognising that the rural nature of the National Park and its dispersed population means that the majority of people rely on the private car to access jobs, services and facilities. There is support for public transport and alternative approaches such as demand responsive transport and car sharing clubs, but does not require these or restrict development on the basis of transport availability, recognising the dependence on the private car (the supporting text and AC-S1). The supporting text also recognises the role of ICT in reducing the need to travel and enabling more people to work from home or access information and services.
- 13.5.6. AC-S1 is also positive in relation to **Housing**. The supporting text refers to the spatial strategy (GP4) which recognises that new development should be focused in the named settlements to maintain their sustainability, self-sufficiency and resilience and should not lead to a severe increase in traffic.
- 13.5.7. AC-S1 was considered to be neutral in relation to the remaining SA topics of **Biodiversity and Green Infrastructure, Historic Environment, Land and Landscape**. Measures encouraged through this policy such as public transport provision (e.g. new bus stops), electric charging points or future resilience of transport infrastructure at risk from climate change could potentially have impacts on these assets, and would have to be tested against other policies in the Plan (GP1, CE-S1, CE-S2, CE-S4). However there is nothing specific in the policy that negatively impacts on them, hence the score is neutral. There could be cross-reference to the increased opportunities for walking etc arising from enhanced green infrastructure (CE-S3) in the supporting text.
- 13.5.8. No specific implications identified in relation to the **Coast**.
- 13.5.9. **Recommendations for Policy AC-S1 Sustainable Transport**

Recommendations	Changes
Include reference to air quality in the text, linked to public transport	Accepted
Move Policy AC-S1 4 th bullet and supporting text on climate change adaptation to AC-S2 Transport Infrastructure and add reference to coastal change in the supporting text	Accepted
Add reference to the increased opportunities for walking, cycling and so on arising from enhanced green infrastructure (CE-S3) in the supporting text	Accepted

- 13.6. **Policy AC-S2 Transport Infrastructure and AC-D1 Transport and Accessibility Requirements for Development**

- 13.6.1. AC-S2 sets out the National Park Authority's approach to transport infrastructure. Although road maintenance and improvement schemes within existing highway boundaries do not require planning permission, consultation arrangements exist with the Highway Authorities to enable the National Park Authority's views to be heard before schemes are implemented. Many of Exmoor's roads, bridges and fords are historic and attractive features in their own right and other roadside features also add to the character of Exmoor's road network. AC-S2 seeks to ensure that any maintenance or improvement works are carried out to the highest environmental standards and in keeping with local character. Policy AC-D1 sets out the transport and accessibility requirements for development. Applications should be located, designed and planned to create attractive environments, avoid community severance and encourage a shift of priority towards pedestrians, cyclists, horse riders and public transport. Transport and Air Quality Assessments are required where proposals are likely to generate severe levels of traffic, accompanied by a Travel Plan to ensure that the proposal delivers sustainable travel outcomes. However, development which will cause unacceptable levels of traffic, or would prejudice road safety interests, will not be permitted.
- 13.6.2. The policies scored strongly positive for **Transport** as they are intended to deliver transport outcomes for the National Park, and cover all the criteria in the SA framework. The policies were also strongly positive for **Historic Environment** and **Landscape**. The importance of Exmoor's roads, historic bridges and fords as historic and attractive features in their own right is recognised, and the policies seek to protect and enhance the rural character of roads. Highway maintenance or improvement works are expected to use materials and finishes appropriate to the built environment. The design of highways works and new access roads should be to be of the highest standards appropriate to local character and the built environment using locally distinctive design. Traditional street furniture and highways signage important to the character of the area should be retained, although highways signage can have an adverse impact on the landscape and streetscene, and opportunities to reduce 'clutter' are encouraged. Transport Assessments will be used to determine whether the impact of proposals likely to generate severe levels of traffic on the special qualities (including landscape and cultural heritage) is acceptable. Development which will cause unacceptable levels of traffic in terms of the environmental or physical capacity of the local road network will not be permitted.
- 13.6.3. The policies were considered to be positive in relation to **Air Quality and Water Resources**, and **Biodiversity and Green Infrastructure**. Road maintenance and improvement works could potentially have local impacts on wildlife or water quality if not carried out carefully. However the National Park Authority works with Highway Authorities to influence how works are carried out and to encourage the highest standards – this should specify that it is the highest *environmental* standards that the National Park Authority will be seeking. AC-S2 seeks to avoid damage during maintenance or construction. AC-D1 supports walking, cycling, low carbon travel and car sharing which will reduce greenhouse gas emissions. The explanatory text requires proposals to not exceed the local road capacity or cause an unacceptable deterioration in air quality. Air Quality Assessments are required where developments are likely to generate severe levels of traffic to consider in more detail impacts on air quality and any mitigation needed.

Developments that will cause unacceptable levels of traffic in terms of environmental capacity will not be permitted. The explanatory text recognises that highways works can cause ecological damage, and AC-S2 seeks to minimise disturbance and damage during maintenance and construction, as well as encouraging incorporation of wildlife enhancements where appropriate. Policy AC-D1 requires the proposals for highways works contribute to the conservation or enhancement of the area – although CE-S2 Biodiversity is not specifically listed, and further explanatory text should be added related to opportunities for biodiversity enhancement.

- 13.6.4. The policies were also considered to be positive in relation to **Climate Change Mitigation and Energy** as they encourage a shift in priority towards pedestrians, cyclists, horse riders and public transport and also support opportunities for low carbon travel including installation of electric charging points. Transport Assessments and Travel Plans will be required if proposals are likely to generate significant levels of transport. These will seek to identify measures to support sustainable transport including minimising the level of trips generated and how accessibility to the site by different transport modes will be achieved. These assessments will be used to determine whether the impact of the development is acceptable. There is no specific reference to impacts on greenhouse gas emissions, which should be added to the supporting text. Policy AC-S2 requires Transport Assessments etc to ensure the proposal delivers sustainable travel outcomes, which would include greenhouse gas emissions (if recommendation adopted).
- 13.6.5. The policies are positive for **Community and Wellbeing** and **Housing**. The concerns of local communities are reflected in relation to road safety issues, particularly for non-motorised modes of transport. The shift in priority towards pedestrians and non-car modes of travel and improved foot and cycle paths will support health and wellbeing. There is also support for car club and car sharing facilities which could help reduce isolation particularly for those without access to their own car. New development is required to avoid community severance and ensure good access to nearby services and facilities, and proposals which will cause unacceptable levels of traffic or prejudice road safety will not be permitted. New roads are generally not considered to be appropriate within the National Park, however, it is recognised that in some circumstances they may be required to provide access to new development including housing.
- 13.6.6. The policies are positive in relation to **Land**, as they focus on road maintenance and improvement schemes on existing roads, and new roads will not be permitted except where they are required for access to new development. In these cases, any new access roads would need to be proportionate to the scale of development. New development is expected to be of an appropriate type and scale so that it can be safely serviced by the existing road network. These requirements will all reduce demand for land take for road infrastructure.
- 13.6.7. There are both positive and negative implications in relation to **Economy and Employment**. On the positive side, the policies encourage travel by modes other than the car to jobs including car share clubs. They also recognise the option of signage for visitor attractions, which can support local businesses, although they can also detract from visual amenity, so the approach is to minimise signage and promote comprehensive approaches

to local signing to reduce clutter. However, any development that will cause unacceptable levels of traffic or prejudice road safety will not be permitted and new development is required to be of an appropriate type and scale so that it can be safely serviced by the existing road network. New roads or upgrading of existing routes to accommodate higher traffic speeds would be resisted by the National Park Authority. These could all constrain economic opportunities.

13.6.8. The policies were given a neutral score for **Climate Change and Adaptation to Flood Risk** and the **Coast** as they do not currently include reference to these issues. However, if the recommendations are accepted, climate change implications for transport infrastructure would be covered, including coastal change, in which case the score would change to positive.

13.6.9. **Recommendations for Policy AC-S2 Transport infrastructure and AC-D1 Transport and Accessibility Requirements for Development**

Recommendations	Changes
Amend supporting text for AC-S2 to require the highest <i>environmental</i> standards and add some explanatory text	Accepted
Add explanatory text for AC-S2 on the potential environmental impacts of road maintenance and improvement schemes, including on air and water quality	Accepted. The text refers to pollution of watercourses, and air quality would be considered as part of local amenity
Amend supporting text for AC-D1 to read 'cause unacceptable deterioration in air quality <i>or the built environment</i> '	Accepted
Add explanatory text for AC-S2 on the potential environmental impacts of road maintenance and improvement schemes, including on biodiversity. This should also explain the wildlife enhancements that may be supported	Accepted
Add reference to CE-S2 Biodiversity in AC-D1 4 th bullet and add explanatory text	Accepted
Add reference to impacts on greenhouse gas emissions in the supporting text	Accepted
Amend AC-S2 to read 'Exmoor NPA will work with Highways and Transport Authorities and <i>local communities</i>	Accepted
Amend AC-D1 2 nd bullet to add <i>community</i> severance	Accepted

13.7. **Policy AC-S3 Traffic Management and Parking, AC-D2 Parking Provision and Standards and AC-D3 Temporary Parking**

- 13.7.1. Exmoor National Park has no strategic road or rail corridors or strategic freight routes. The main routes for traffic including visitor traffic during the tourism season are the A39 and A396, with the A399 passing close to and through the western boundary of the National Park. Local freight routes are designated for local access only. The rural character of the roads and lanes in the National Park are important to its overall character and many are important historic features in their own right. Policies AC-S3, AC-D2 and AC-D3 set out the National Park Authority's approach to traffic management and parking.
- 13.7.2. The policies were considered to be strongly positive in relation to the SA topic of **Transport**. The policies aim to ease traffic congestion in the tourism season. They seek to meet the needs of all users, including cyclists, disabled users and so on, and identify local solutions to parking and congestion problems. The Exmoor Route Network aims to ensure that traffic uses the roads most suited to the purposes of its journey. AC-D3 allows temporary parking measures to accommodate peak parking demand where shortfalls are causing environmental harm or affecting communities.
- 13.7.3. Policies AC-S3, AC-D2 and AC-D3 scored positively for **Air Quality and Water Resources**. Although there is no specific reference to air quality, many of the measures to reduce traffic will benefit air quality. The SA Scoping report states that air quality in the National Park is generally good, although the main pollutants arise from the transport sector including nitrogen dioxide from cars and HGVs. The supporting text identifies that there may be increase in delivery vans due to internet shopping and that there should be co-ordination and shared deliveries to reduce the impact. The supporting text states that opportunities should be identified to minimise the adverse impacts of traffic. This could include the provision of temporary overflow parking provision during peak periods where this is impacting on the environment and amenity, including air quality.
- 13.7.4. The policies scored positively for **Climate Change Mitigation and Energy**. The supporting text states that opportunities should be identified to minimise the adverse impacts of traffic and the approach to traffic management should help to minimise the impact of traffic on greenhouse gas emissions. The supporting text identifies that there may be increase in delivery vans due to internet shopping and that there should be co-ordination and shared deliveries to reduce the impact. The supporting text reflects the need to balance parking provision and encourage people to adopt sustainable modes of travel wherever possible. The supporting text states a presumption against providing for peak demand for parking due to the need to seek more sustainable solutions to the management of traffic and demand for parking.
- 13.7.5. The policies were also considered to be positive for **Community and Wellbeing**. The impact of traffic on local communities and reduction in their quality of life is recognised. The supporting text highlights that streets should be inclusive for all and promotes innovative approaches including shared surfaces and enhancing the street scene. Cycle parking and facilities are encouraged. There are also concerns over high traffic speeds and the danger this proposes for vulnerable users such as walkers, horse-riders and cyclists. The National Park Authority will seek to ensure that the needs of more vulnerable road users are taken account of in traffic management. There is an aspiration to provide alternatives to busy roads and other safety measures. The approach to parking is to

provide for community needs rather than peak parking, with temporary solutions being sought where peak parking demands are adversely affecting the quality of life of local communities. Other provision for local communities includes reserving small car parks for communities and the provision of community car parks associated with other community facilities such as village halls. There is also specific provision for disabled people including in AC-D2 parking standards.

- 13.7.6. The policies scored positively for **Historic Environment** and **Landscape**. The supporting text reflects the importance of small rural lanes to the character of the National Park and that they often are important historic and attractive features in their own right. There is recognition of the demand to the physical fabric of buildings from traffic and that some traditional bridges are showing signs of physical deterioration as they are carrying volutes and weights of vehicles greater than intended for its original use. It is important to ensure measures are adopted to reduce pressure on these bridges through advisory routes. The supporting text promotes streets as being attractive places in their own right, with innovative approaches such as shared surfaces which can also reduce 'clutter' and enhance the street scene. There is a presumption against providing for peak parking demand due to the impact on the environment; this could refer specifically to the natural *and* built environment to ensure that impacts on the historic environment are considered. The supporting text reflects that there may be scope for rationalising, relocating or redesigning existing parking where this would achieve environmental gains, which could include landscape improvements. Extensions to existing car parks or minor new facilities will be subject to conservation objectives and a design led approach to parking provision is promoted, that is well integrated with a high quality public realm. Temporary solutions will be sought for peak parking where this is causing damage – this should specify *environmental* damage. Local solutions to congestion and parking issues will be sought, in keeping with landscape character. The approach to parking provision is to minimise parking required, taking into account environmental constraints which would include landscape constraints.
- 13.7.7. The policies were positive for **Housing**. The policy approach reflects the importance of parking provision on Exmoor due to the high dependency on the car, coupled with the need to balance this with the special qualities of the National Park. The supporting text explains the approach to parking provision, with the principle being to minimise parking, taking into account environment constraints and guided by the standards in the table. Where developments are in locations that are well served by public transport or have good walking and cycling links, lower levels of car parking provision may be appropriate. There may also be circumstances where no parking is provided, taking into account the proximity of public parking including on-road parking, to enable an otherwise acceptable development to go ahead. The approach outlined in the policy is intended to enable affordable housing to be provided, with adequate parking.
- 13.7.8. The policies were also considered to be positive for **Land**. The approach to parking provision has taken into account the need to reduce land take given the limited capacity of suitable developable land within the National Park. This includes the emphasis on maximising the use of existing facilities, the presumption against providing for peak parking, and the use of temporary solutions. Use of brownfield land for temporary parking

may be allowed if this leads to enhancement in accordance with GP6 Enhancing the National Park’s Special Qualities and CE-S7 Design and Sustainable Construction principles. The design of parking provision in development should also avoid ‘land hungry approaches’. The exception to this is provision for people with disabilities, which would need to be in accordance with the Regulations.

- 13.7.9. The policies scored negatively for **Economy and Employment**. Exmoor is disadvantaged economically as it has no strategic road or rail corridors, which can hinder economic opportunities. Traffic and congestion including over demand for parking during peak tourism periods can be bad for business. However, AC-S3 seeks to provide for community needs rather than peak parking which will reduce potential custom for local businesses, although temporary solutions will be sought. Similarly, small car parks could be reserved for communities which would restrict available parking for local businesses. The emphasis is on maximising the use of existing car parks. AC-D2 and the accompanying Table guides parking provision. The principle will be to provide the minimum parking required taking into account environmental constraints, although bicycle, motorcycle and disabled parking provision are all encouraged.
- 13.7.10. The policies were given a mixed score in relation to **Biodiversity and Green Infrastructure**. There is a presumption in AC-S3 against providing for peak parking demand due to the impact on the environment; this could refer specifically to the *natural and built* environment, which would provide a positive outcome for biodiversity. Extensions to existing car parks or minor new facilities will be subject to conservation objectives including impacts on wildlife. Walking and cycling are encouraged as a means of recreation and enabling residents to access jobs, services and community facilities. This could also support networks of Green Infrastructure. Policy AC-D3 allows for temporary parking measures. It is recognised that these are primarily likely to be on greenfield land and grassed surfaces should be retained and conserved using reinforced mesh to protect the vegetation and soil structure. However, some temporary parking areas could also be wildlife habitats, for example orchards, and care should be taken to avoid or minimise impacts, including restoration measures if necessary after the temporary use has ceased.
- 13.7.11. The policies were given a neutral score in relation to **Climate Change and Adaptation to Flood Risk**, and the **Coast** although again this could change to positive if the recommendations are adopted. There may be existing car parks that are vulnerable to climate change including from coastal change. These would be covered by the resilience bullet point in AC-S2 transport infrastructure, but there should be cross-reference in this section. AC-D2 refers to taking account of environmental constraints in relation to parking provision, although it is not specified that this includes climate change implications.
- 13.7.12. **Recommendations for Policy AC-S3 Traffic Management and Parking and AC-D2 Parking Provision and Standards and AC-D3 Temporary Parking**

Recommendations	Changes
Add reference to air quality in supporting text	Accepted

Amend supporting text for AC-S3 to add at the end ' <i>and contribute to reducing greenhouse gas emissions (see CC-S1 Climate Change)</i>	Accepted
Amend wording in supporting text to read ' <i>the natural and built environment</i> '	Accepted
Add a reference in AC-D2 to design of parking provision, to reflect supporting text, to read ' <i>Parking provision should be well designed and integrated with a high quality built environment</i> '	Accepted
Add reference in supporting text for AC-S3 to CE-S1 Landscape Character, CE-S2 Biodiversity, and CE-S4 Cultural Heritage	Accepted
AC-D3 Temporary Parking - Add requirement in the supporting text to avoid or minimise impacts on wildlife including restoration measures if necessary after the temporary use has ceased	Accepted
Amend AC-S3 supporting text relating to temporary solutions for peak parking demand to read ' <i>environmental damage</i> '	Accepted
Add reference to Green Infrastructure in supporting text for AC-S3	Accepted
Add cross-reference to AC-S2 Transport Infrastructure in relation to risks to existing car parks from climate change and sea-level rise	Accepted

13.8. **AC-S4 Electricity and Communications Networks, AC-D4 Radio and Mobile Telecommunications Infrastructure, AC-D5 Fixed Line Transmission Infrastructure, AC-D6 Satellite Antennae**

13.8.1. This suite of policies support improvements to the telecommunications network and electricity infrastructure, recognising that these are crucial to underpin the vitality and viability of Exmoor's communities and the economy, and will help to reduce the need to travel by car. The policies seek to balance these objectives against the conservation of the National Park's natural beauty, landscape, wildlife and cultural heritage.

13.8.2. The policies scored strongly for **Community and Wellbeing** and **Economy and Employment**. The purpose of the policies is to underpin the vitality and viability of Exmoor's communities and businesses. The importance of ICT, electricity and telephone services for communities and businesses, particularly in rural areas, is reflected in the supporting text. The roll out of improved and superfast broadband is encouraged to address the digital deprivation in rural areas, which will also support home working and enable businesses to relocate to rural areas. The supporting text recognises the importance of the Airwave Network for essential public services such as the emergency

services. The health implications of new telecommunications developments are recognised, which must not exceed non-ionising radiation protection guidelines, and the supporting text identifies siting issues including proximity to residential properties. AC-S4 encourages improvements to the accessibility and standard of the electricity and telecommunications networks that will contribute to ensuring that Exmoor's communities and businesses continue to thrive. AC-D4 point C states that the amenity of nearby residents and visitors will be protected. The visual impact of telecommunications infrastructure is recognised, but the National Park Authority will work with mobile operators to seek positive solutions compatible with National Park designation. AC-D4 promotes optimal environmental solutions including the sharing of existing infrastructure; this could include landscape enhancements through consolidation. This would indirectly support the economy through maintaining the natural beauty and visual amenity of the National Park which is an important draw for tourism. The sharing of existing infrastructure by multiple operators will also improve network coverage and consequently the experience of visitors to the National Park. Similarly, undergrounding of cables would also provide environmental enhancement and improve visitor experience. AC-D5 states that proposals will not adversely affect recreational use of the coast which will be important for the tourism industry.

- 13.8.3. The policies also scored strongly positive for **Landscape**. The policy approach is to support improvements to the telecommunications and electricity infrastructure network, whilst ensuring that the conservation of the National Park's special qualities including landscape is not compromised. The duty of all statutory undertakers including utilities and telecoms companies to have regard to National Park purposes is stated. The sensitivity of many locations in the National Park to communications infrastructure due to the visual intrusion of masts, poles and lines and impacts on landscape character is recognised, and the corresponding support for undergrounding in the consultation. The optimal environmental solution will be sought to minimise impacts on landscape character and visual amenity including design, screening, and so on. In addition, the sharing of telecommunications infrastructure is supported, which will minimise landscape and visual impacts and could achieve enhancements where existing infrastructure is consolidated. However, concerns over the proliferation of satellite antennae are recognised, with the response being to ensure they are attached to the least obtrusive part of the building. Small scale marine renewable energy technologies are supported as these are likely to be less harmful in terms of impacts on seascape from landfall elements of grid connection.
- 13.8.4. The policies were positive for **Biodiversity and Green Infrastructure** and **Historic Environment**. The policy approach is to support improvements to the telecommunications and electricity infrastructure network, whilst ensuring that the conservation of the National Park's special qualities including wildlife and cultural heritage is not compromised. The duty of all statutory undertakers including utilities and telecoms companies to have regard to National Park purposes is stated. The optimal environmental solution will be sought including consideration of the site in relation to buildings including those of a historical or traditional character. Concerns over the proliferation of satellite antennae are identified, and AC-D6 permits installation of satellite antennae where there is no unacceptable harm to the historic or architectural interest of traditional buildings, street scene or settlement character. There is support for undergrounding from the

consultation, with potential areas including the Conservation Area in Dulverton identified. AC-D5 requires cabling to be underground unless there are impacts on wildlife or cultural heritage that cannot be mitigated. Similarly, grid connections from nationally significant offshore renewable energy schemes will be resisted as the landfall would cause unacceptable damage to the natural environment or cultural heritage. However, small scale marine renewable energy installations and associated landfall will be supported where the development is carried out to the highest environmental standards and any potential impacts can be avoided through mitigation. There may be opportunities for reinstatement of land (AC-S4) to achieve environmental enhancement, which could include wildlife habitats.

- 13.8.5. The policies also scored positively for **Land**. The public support for undergrounding is highlighted, and AC-D5 requires cabling to be undergrounded unless there are impacts on wildlife or cultural heritage that cannot be mitigated. This will involve some land take but in the majority of cases is not likely to sterilise the land use above. AC-S4 and AC-D4 support the sharing of telecommunications infrastructures including consolidation of existing infrastructure, which will reduce land take. Small scale marine renewable energy installations are supported (AC-D5) where the existing infrastructure can support the landfall connection or any upgrading is minimal. The reinstatement of land is required (AC-S4) when the apparatus becomes redundant.
- 13.8.6. The policies scored positively for the **Coast**, which is an important part of Exmoor's landscape character, and any impacts on this would be covered by the protection of natural beauty and landscape (AC-S4). The disruptive impact of transmission lines and poles on the landscape is identified and support for undergrounding, including at Porlock Marsh on the coast. Reference could be made to the coast and seascapes including Heritage Coast. Grid connections from nationally significant offshore renewable energy schemes will be resisted as the landfall would cause unacceptable damage to the natural environment including seascape. Small scale marine renewable energy installations and associated landfall are considered to be significantly less harmful in terms of impacts on seascape and natural environment and will be supported where the development is carried out to the highest environmental standards and any potential impacts can be avoided through mitigation (AC-D5).
- 13.8.7. There were both positive and negative implications for **Air Quality and Water Resources, Climate Change Mitigation and Energy, and Transport**. The policies include promotion of broad band and ICT, which will enable increased home working. The supporting text recognises that rural home working is three times greater than in urban areas and a third of working age population works at or from home. This will be positive in terms of reducing the need to travel to work and therefore reducing greenhouse gas emissions. However it could also lead to increased transport movements in terms of delivery vans from internet shopping (as highlighted in AC-S1) and also if rural manufacturers and retailers have access to worldwide markets.
- 13.8.8. The policies were given a neutral score in relation to **Climate Change and Adaptation to Flood Risk**. There are no specific references to climate change adaptation or flood risk in the policies. However, there may be need to replace existing infrastructure due to coastal

change or flood risk. This would be covered by policies CC-S1 Climate Change, CC-D1 Flood Risk, CC-S2 Coastal Change, but cross-reference should be made in the text.

13.8.9. No relevant issues relating to **Housing** were identified.

13.8.10. **Recommendations for AC-S4 Electricity and Communications Networks, AC-D4 Radio and Mobile Telecommunications Infrastructure, AC-D5 Fixed Line Transmission Infrastructure, AC-D6 Satellite Antennae**

Recommendations	Changes
Add supporting text relating to the opportunities for environmental enhancement from reinstatement of land	Accepted
Add reference to climate change mitigation in AC-S4 and supporting text	Accepted
AC-D4 add <i>'there are no unacceptable impacts on heritage assets (CE-S4 Cultural Heritage)'</i>	Accepted
Add reference to the coast and seascapes	Accepted
Add reference to the potential need to replace existing infrastructure due to coastal change or flood risk and cross-refer to policies CC-S1 Climate Change, CC-D1 Flood Risk, CC-S2 Coastal Change	Accepted

14. Exmoor's Settlements

14.1. Overview

- 14.1.1. This section of the Local Plan sets out information that applies to defined settlements within the National Park (GP4 Spatial Strategy). For each settlement there is an inset map and written statement. The written statement outlines the key aspects of each settlement in relation to its setting, built environment and local services. Where they have been prepared, parish and other community-led plans have also been taken into account.
- 14.1.2. There are two policies:
- **ES-S1 Supporting Local Communities**
 - **ES-S2 Lynton and Lynmouth Neighbourhood Plan**
- 14.1.3. These are enabling policies and do not have specific implications that can be assessed against the SA objectives.
- 14.1.4. ES-S1 Supporting Local Communities sets out that the National Park Authority will work with local communities where they have identified priorities and plans for development, for example through parish plans or Neighbourhood Plans. Such plans themselves would need to be considered in relation to SA requirements.
- 14.1.5. ES-S2 Lynton and Lynmouth Neighbourhood Plan sets out that development proposals within Lynton and Lynmouth parish will be determined in accordance with the Neighbourhood Plan and the strategic policies of the Exmoor Local Plan. If a conflict arises between the two, the Neighbourhood Plan will take precedence. The Neighbourhood Plan has been subject to a separate Sustainability Appraisal¹⁶.
- 14.1.6. An appraisal of the settlements has been carried out along with the spatial strategy (GP4) (see Chapter 7 above).

¹⁶ The LynPlan Sustainability Appraisal Report (2012), Clare Reid Consultancy for Lynton and Lynmouth Town Council

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

15.1. Overall Assessment of the Local Plan against SA Topics

15.1.1. An overall assessment of the draft Plan against each SA topic is given below.

15.1.2. **Air Quality and Water Resources.** Overall the impacts of the draft Local Plan on air quality and water resources are either positive or neutral. Two policies could have had negative impacts, but recommendations were made to mitigate against these (see Table 12 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.

15.1.3. **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). One policy could have had negative impacts but recommendations were made to mitigate against these (see Table 12 below). The spatial strategy includes some settlements where there are wildlife protected areas, and development could be constrained in these areas as a result. A separate Habitats Regulation Assessment has been undertaken to consider the implications of the draft Local Plan for internationally important habitats.

15.1.4. **Climate Change and Adaptation to Flood Risk.** Overall the draft Local Plan is either positive or neutral in relation to climate change and flood risk. Two policies could have had negative impacts, but recommendations were made to mitigate against these (see Table 12 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.

- 15.1.5. **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.
- 15.1.6. **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.
- 15.1.7. **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. One policy could have negative impacts (see Table 12 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.

- 15.1.8. **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 12 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.
- 15.1.9. **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 (controlled by a mechanism which ensures that can be lived in by anyone but only as their principal residence) where it can be demonstrated as a requirement to enable delivery of affordable housing which cannot be made financially viable without it. Focusing on local needs affordable housing will generally be positive for the SA objective, as this is where the need has been demonstrated. However, as the approach is needs led, there are unlikely to be significant numbers of new housing (either new build or conversions), leading to some mixed or uncertain effects in relation to the sustainability objectives. The location and amount of housing may be constrained by protection of the natural and historic environment in some cases, as well as consideration of flood risk, as a number of settlements have areas at risk of flooding. There are two policies which could have negative impacts, but recommendations have been made to mitigate against this (see Table 12 below).
- 15.1.10. **Land.** The draft Local Plan is generally positive in relation to land. One of the key considerations has been the limited capacity for development due to constraints of topography, landscape and so on and therefore the approach taken is to ensure that the best use is made of the limited supply of suitable land. The only exception to this is specialist housing, where an element of 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 12 below).

- 15.1.11. **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 Study¹⁷. 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.
- 15.1.12. **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).
- 15.1.13. **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

¹⁷ Landscape Sensitivity Study (2011) Paul Bryan for Exmoor National Park Authority

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 12 below).

15.2. **Cumulative Effects**

- 15.2.1. 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.
- 15.2.2. 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 Local Service Centres and Villages identified in the spatial strategy. The focus on re-use of existing buildings and the provision of affordable (rather than market) housing will also reduce land-take.
- 15.2.3. 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.
- 15.2.4. It is anticipated that there will not be any significant cumulative effects on air quality, water resources, carbon emissions, the coast, or transport.

15.3. **Consideration of Alternatives**

- 15.3.1. The SEA Directive requires assessment of the likely significant effects of implementing the plan, and “reasonable alternatives”. Developing options or alternatives is an important part of both the plan-making and sustainability appraisal process. For the Local Plan, different options were put forward during the preparation of the plan. This included

options for how affordable housing could be delivered, and options for where new development should go. These options were appraised and subject to consultation¹⁸.

- 15.3.2. 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 to the dispersed settlement pattern and potential additional travel movements. These potential negative impacts have been examined in more detail in relation to the settlement strategy and, although no specific site allocations or housing targets have been set, any proposals that do come forward will have to ensure negative impacts are avoided or mitigated, in accordance with policies in the Plan.
- 15.3.3. 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 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 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.
- 15.3.4. 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, as documented in the Chapters above.

15.4. **Monitoring**

- 15.4.1. 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).

¹⁸ Sustainability Appraisal Report – Local Plan Vision, Objectives, General Policies and Options, (2011) prepared by Clare Reid Consultancy for Exmoor National Park Authority

16. Changes Made as a Result of the SA and Mitigation Measures

- 16.1. The SA was carried out as an iterative part of the Plan preparation process. As a result, many changes have been made to the draft Plan in response to the SA recommendations, as detailed in the Chapters above. This includes mitigation measures to avoid potentially negative impacts of the Plan (see Table 12 below), as well as recommendations that have helped to strengthen the sustainability outcomes of the draft Plan (for example changing neutral scores to positive, or strongly positive).
- 16.2. Only four scores remain which are negative. These relate to transport, housing and economy objectives, where no changes were recommended by the SA due to the overriding importance of the National Park statutory purposes to conserve the landscape, wildlife and cultural heritage; and promote understanding and enjoyment.

Table 12 – 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 where these conflict, giving greater weight to conservation of biodiversity
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	None proposed. The conservation and enhancement of the historic environment would be given great

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 Climate Change Adaptation and Flood Risk	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. Specialist housing proposals would need to take particular account of flood risk and climate change 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	Cross-refer to CE-S4 Cultural Heritage which affords appropriate protection to buildings of historic, architectural interest. Refer to CC-S1 Climate Change, CC-D1 Flood Risk to ensure proposals take account of flood risk and climate change adaptation requirements
HC-S6 Travelling communities	Air quality and water resources	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	Add reference in supporting text to include provision of suitable water (CC-D3

	Climate Change Adaptation and Flood Risk	site is required to address a proven 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).	Water Conservation) 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, motorcycle and disabled parking provision are all encouraged	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

Appendix 1 - Sustainability Appraisal Framework

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

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

Topic	Objectives	Criteria – will the proposals in the Plan...	Indicators
Air Quality and Water Resources	<p>1. To minimise air pollution (including green house gas emissions) and water pollution and ensure air and water quality is maintained or improved.</p> <p><i>Explanation: This objective seeks to minimise pollution from development.</i></p>	<ul style="list-style-type: none"> ➤ Maintain or improve air and water quality? ➤ Minimise emissions from residential and commercial sources? ➤ Reduce emissions from transportation sources? 	<ul style="list-style-type: none"> • Air quality Monitoring data – Environmental Health (WSC & NDC) • Domestic per capita CO2 (tonnes). • % of river length reaching grade A/B (Very good/good) quality for chemical and biological assessment.
Biodiversity and Green Infrastructure	<p>2. To conserve and enhance biodiversity and to protect, conserve and enhance all habitats and species.</p> <p><i>Explanation: These objectives seek to conserve and enhance Exmoor's biodiversity, habitats and species so that any negative impacts from development are avoided or mitigated when meeting the needs of communities and visitors.</i></p>	<ul style="list-style-type: none"> ➤ Conserve and enhance the diversity of species? ➤ Conserve and enhance the diversity of habitats? ➤ Make provision for protected and important species and habitats where appropriate? ➤ Have no adverse impact on SACs or SSSIs? ➤ Enhance local biodiversity and the natural environment? 	<ul style="list-style-type: none"> • Area of new BAP habitat created or restored. • Number of SACs and SSSIs in favourable or unfavourable recovering condition. • Proportion of Local Wildlife Sites where positive conservation management has been or is being implemented (NI197). • Number of applications with provision for protected/important species. • Number of applications with provision for protected/important habitats. • Number of applications where a wildlife survey has been submitted.
Climate Change and Adaptation to Flood Risk	<p>3. To minimise and manage the risk of all forms of flooding.</p> <p>4. To minimise the impacts of climate change on Exmoor's communities</p>	<ul style="list-style-type: none"> ➤ Put properties at risk of flooding? ➤ Provide development in the flood plain? ➤ Provide development in areas vulnerable to coastal change? ➤ Put communities and habitats 	<ul style="list-style-type: none"> • Number of planning permissions granted contrary to Environment Agency advice on flood defence grounds. • Number of permissions

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Topic	Objectives	Criteria – will the proposals in the Plan...	Indicators
	<p>and habitats.</p> <p>Explanation: <i>These objectives seeks to manage and minimise the impacts of climate change and flood risk and help communities and habitats to adapt as appropriate.</i></p>	<p>vulnerable to the effects of climate change at risk?</p>	<p>which make a positive contribution to sustainable flood management. (include SUDS proposals)</p> <ul style="list-style-type: none"> • Number of planning permissions in areas vulnerable to coastal change. • Number of planning permissions for structures and measures to adapt to the impacts of climate change e.g. coastal defences.
<p>Climate Change Mitigation and Energy</p>	<p>5. To minimise the net emissions of carbon dioxide and other greenhouse gases into the atmosphere and to minimise Exmoor’s contribution to global climate change.</p> <p>Explanation: <i>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 the target of becoming a carbon neutral National Park by 2025.</i></p>	<ul style="list-style-type: none"> ➤ Ensure development incorporates energy sustainability measures? ➤ Maximise Exmoor’s potential for renewable energy generation? ➤ Improve the sustainability of Exmoor’s communities? ➤ Encourage the use of sustainable building design and methods? ➤ Encourage travel by sustainable means of transport? 	<ul style="list-style-type: none"> • Domestic per capita CO2 (tonnes) – measure every 5 years. • Number of planning permissions for renewable technologies and other energy sustainability measures. • Housing development that incorporates energy and sustainability measures (above building regulation requirements).
<p>Community and Wellbeing (including equalities and health)</p>	<p>6. To promote and support thriving and inclusive communities, health and wellbeing.</p> <p>Explanation: <i>this objective</i></p>	<ul style="list-style-type: none"> ➤ Provide for community services? ➤ Encourage healthy lifestyles? ➤ Improve access to the Park and to its opportunities and facilities for all? ➤ Create new access opportunities where appropriate? 	<ul style="list-style-type: none"> • Amount of open access land available under the CROW Act 2000. • Index of multiple deprivation and measures of health deprivation.

Topic	Objectives	Criteria – will the proposals in the Plan...	Indicators
	<p><i>focuses on securing balanced, inclusive communities where people can live healthy lives, have equality of access to community, education and health services and facilities, and have access to and enjoy cultural and recreational opportunities.</i></p>	<ul style="list-style-type: none"> ➤ 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? 	<ul style="list-style-type: none"> ● 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.
<p>Economy and Employment</p>	<p>7. To promote and support appropriate, sustainable economic growth, particularly of the key business sectors of tourism, agriculture and other land based industries and small businesses.</p> <p><i>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. Economic development will be appropriate to the National Park setting and where possible will benefit from and help to promote the National Park's special qualities.</i></p>	<ul style="list-style-type: none"> ➤ Promote and support a sustainable tourism sector? ➤ Promote and support a sustainable agricultural sector and other land based industries? ➤ Promote and support small businesses? ➤ Encourage use of local products and services? ➤ Help to implement the installation of infrastructure 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? 	<ul style="list-style-type: none"> ● Number of registered farm holdings. ● % occupancy of beds in holiday accommodation throughout the year. ● Tourist spending. ● Occupancy rates for serviced and non-serviced accommodation. ● % of tourism businesses participating in green/sustainable initiatives or schemes. ● Number of applications permitted to create serviced/non-serviced accommodation. ● Loss of serviced/non-serviced accommodation. ● Number of applications permitted for: camp sites, camping barns, certificated caravan sites. ● Number of applications/floorspace (or monitor completed development) for business development (B1, B2 &

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Topic	Objectives	Criteria – will the proposals in the Plan....	Indicators
			<p>B8). Could also include separate indicators for A class uses and C1.</p> <ul style="list-style-type: none"> • Number of planning applications for change of use from business to other use. • Number of live/work/home-working spaces permitted. • Number and area of agricultural buildings permitted. • Number and proportion of agricultural buildings refused. • Number of farm diversification proposals permitted for: <ul style="list-style-type: none"> • Conversion of traditional farm building • Conversion of modern farm building • New building • Number of applications permitted for development for game-bird shooting. • Number of applications approved for equestrian development.
<p>Historic Environment</p>	<p>8. To maintain and enhance the quality of the built environment.</p> <p><i>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.</i></p>	<ul style="list-style-type: none"> ➤ Conserve the character of historic landscapes? ➤ Conserve the character of settlements and buildings? ➤ Protect and enhance ancient monuments and other heritage assets? ➤ Recognise the potential of the historic environment to contribute to social and economic progress. ➤ Improve access and understanding of local heritage. ➤ Promote a standard of quality in new building design? ➤ Encourage use of local and traditional and sustainable buildings products and materials? ➤ Enhance the distinctiveness and diversity of the local built environment and community spaces? 	<ul style="list-style-type: none"> • Use of local and/or traditional buildings materials in new developments or conversions and extensions. • Number of conservation area enhancement projects. • Number of archaeological projects (i.e. restoration). • Number of listed buildings: on the at risk register; subject to unauthorised alterations; subject to demolition; and successful enforcement action. • Number of listed building consents refused.
<p>Housing</p>	<p>9. To help ensure that</p>	<ul style="list-style-type: none"> ➤ Provide affordable housing? ➤ Provide for the housing needs of 	<ul style="list-style-type: none"> • The proportion, tenure and type of affordable

Topic	Objectives	Criteria – will the proposals in the Plan...	Indicators
	<p>National Park communities have access to appropriate, good quality, sustainable, affordable housing.</p> <p>Explanation: <i>This objective seeks to provide housing to maintain balanced living and working communities and in doing so provide a sustainable mix of affordability, size and type of housing that is of good design and sustainable materials and provides for the needs of young and older people and those whose work is important to communities.</i></p>	<p>older people?</p> <ul style="list-style-type: none"> ➤ 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. 	<p>dwellings approved and constructed.</p> <ul style="list-style-type: none"> • 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.
<p>Land (including agricultural, brownfield, contaminated land, waste and minerals)</p>	<p>10.To promote sustainable forms of development and sustainable use of natural resources.</p> <p>Explanation: <i>This objective seeks to concentrate and diversify development by optimising the use of previously developed land, infrastructure, under used land and vacant properties.</i></p> <p>11.To reduce all forms of waste production and promote reuse and recycling and minimise the risk of contaminated land.</p>	<ul style="list-style-type: none"> ➤ Promote sustainable mineral extraction? ➤ Promote the reuse of land and buildings? ➤ Protect the best and most versatile land from development? ➤ Contribute to the reduction, reuse and recycling of waste? ➤ Contribute to appropriate waste treatment and disposal? ➤ Minimise the risk of contaminated? ➤ Reduce soil quantity and quality? 	<ul style="list-style-type: none"> • Number of planning permissions built on previously developed land. • Loss of the best and most versatile agricultural land to development (need a GIS layer available on PACS). • Loss of greenfield land to development. • Percentage of waste generated, recycled, composted and sent to landfill. • Number of planning permissions for redevelopment of contaminated sites. • Number and type of mineral applications permitted.

Topic	Objectives	Criteria – will the proposals in the Plan...	Indicators
	<p>Explanation: <i>Although the National Park is not the waste authority, it will seek to implement policies to reduce the amount of waste generated and to promote sustainable waste management.</i></p>		
<p>Landscape</p>	<p>12. To protect, maintain and enhance the special qualities of the Exmoor National Park's landscape character.</p> <p>Explanation <i>This objective aims to ensure that Exmoor retains its wild, remote and tranquil setting to enable the quiet enjoyment of the National Park.</i></p>	<ul style="list-style-type: none"> ➤ Reduce or mitigate the adverse effects of agricultural change on the landscape? ➤ Ensure development is sited and designed with landscape in mind? ➤ Reduce the impact of large structures and development that can be seen from the National Park? ➤ Reduce the impact of recreational activities on the landscape? ➤ Contribute to the wild, remote and tranquil setting of Exmoor? 	<ul style="list-style-type: none"> • Number of planning permissions (outside the National Park boundary) that enable large structures and development to be visible from the National Park boundary. • Agri-environment scheme uptakes. • Percentage change in farming businesses. • Loss or damage to key landscape features (woodlands, walls, hedges and 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.
<p>Coast</p>	<p>13. To protect and/or enhance coastal areas.</p> <p>Explanation <i>This objective aims to protect and/or enhance coastal areas and minimise the effects of coastal change on communities, the cultural heritage and habitats at risk from the effects of climate change. In some circumstances the coast cannot be feasibly protected in the long term and</i></p>	<ul style="list-style-type: none"> ➤ Put coastal communities and habitats at risk of the effects of coastal change? ➤ Minimise the impact of sea level rises? ➤ Direct development away from vulnerable coastal areas? ➤ Consider the implications sea level rise may have on historic and cultural assets? 	<ul style="list-style-type: none"> • Number of planning permissions in areas vulnerable to coastal change • Number of planning permissions for coastal structures and measures to adapt to the impacts of climate change e.g. coastal defences. • Number of planning permissions for temporary business development in areas vulnerable to coastal change.

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Topic	Objectives	Criteria – will the proposals in the Plan...	Indicators
	<i>adaptation measures which enhance the coastal area will be necessary.</i>		
Transport	<p>14. Encourage travel by sustainable means of transport and provide access to services, whilst recognising the need to travel by private modes of transport in a dispersed rural area such as Exmoor.</p> <p>Explanation: <i>This objective, although aspirational in seeking to reduce travel by means of the private car, recognises that Exmoor is a dispersed rural area where currently there is a need to travel by private modes of transport in order to access services and facilities.</i></p>	<ul style="list-style-type: none"> ➤ Help to ease traffic congestion in the tourism season and provide more sustainable ways of accessing the National Park? ➤ Safeguard public rights of way? ➤ Improve opportunities for safe horse-riding, cycling and walking as an alternative to car travel? ➤ Reduce the need to travel, especially by private car? ➤ Improve access to online and mobile services to reduce travel by car? ➤ Support demand responsive, low-carbon public transport for the local community? ➤ Support improved (and low carbon) access to essential goods and services? 	<ul style="list-style-type: none"> • Average daily traffic movements. • Public transport routes. • Percentage of public rights of way ‘easy to use’ (BVPI 178). • Length of public right of way adversely affected by development.

Appendix 2 – SEA Directive requirements

SEA Directive Requirements	Reported in...
An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes.	Scoping Report / Environmental Report
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Scoping Report (summarised in Environmental Report)
The environmental characteristics of areas likely to be significantly affected.	Scoping Report (summarised in Environmental Report)
Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Scoping Report (summarised in Environmental Report)
The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	Scoping Report (summarised in Environmental Report)
The likely significant effects (1) on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.	Environmental Report
The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Environmental Report
An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Environmental Report
A description of the measures envisaged concerning monitoring.	Environmental Report
Where an environmental assessment is required...an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated.	Environmental Report
A non-technical summary of the information provided under the above headings.	Environmental Report Non-technical summary
The (environmental) authorities...shall be consulted when deciding on the scope and level of detail of the information which must be included in the environmental report.	Consultation on the Scoping Report
Taking the environmental report and the results of the consultations into account in decision-making (Art. 8)	

