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Exmoor National Park Local Plan 2011-2031 (including minerals and waste policies)

Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) Adoption Statement

Prepared by LUC
July 2017

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

Client: Exmoor National Park Authority

Version	Date	Version Details	Prepared by	Checked by	Approved by
1	03/07/2017	Draft SA/SEA Adoption Statement	Sarah Smith	Nick Hilton	Nick Hilton
2	10/07/2017	Final SA/SEA Adoption Statement	Sarah Smith	Nick Hilton	Nick Hilton
3	13/07/2017	Updated SA/SEA Adoptions Statement	Sarah Smith	Nick Hilton	Nick Hilton



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Contents

1	Introduction	1
	Requirement for the Adoption Statement	1
2	How environmental and sustainability considerations have been integrated into the Local Plan	3
3	How the Environmental/SA Report has been taken into account	21
4	How opinions of consultation bodies and the public have been taken into account	26
5	Why the adopted Local Plan was chosen in light of reasonable alternatives	28
6	How will the environmental and sustainability effects of the Local Plan be monitored?	30

Tables

Table 2.1: SA Framework for the Exmoor National Park Local Plan	6
Table 3.1: Iterations of the Exmoor National Park Local Plan and accompanying SA work	20

1 Introduction

- 1.1 Exmoor National Park Authority adopted the Exmoor National Park Local Plan on 4th July 2017.
- 1.2 During the preparation of the Local Plan, the National Park Authority (NPA) was required by law to carry out a Sustainability Appraisal (SA) and a Strategic Environmental Assessment (SEA) of the plan as it developed. Both the SA and SEA requirements were met through a single integrated process (referred to as SA), the method and findings of which were described in a number of SA reports published alongside the different versions of the Local Plan during its development.
- 1.3 Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations (2012) requires Exmoor NPA to make the final SA Report available alongside the Adopted Local Plan.
- 1.4 The final SA Report for the Adopted Local Plan is the Exmoor National Park Local Plan: Proposed Main Modifications (including minerals and waste policies) Sustainability Appraisal Report (December 2016). This report meets the requirements of an Environmental Report in accordance with the SEA Regulations¹ and reflects the Local Plan that was submitted to the Secretary of State for examination in May 2016, also incorporating the proposed changes (Main Modifications) to the Local Plan that were consulted on between January and February 2017. In some cases, the Inspector has amended the detailed wording of these Main Modifications and added other, closely related modifications, presented in his Report on the Examination of the Exmoor National Park Local Plan 2011–2031². The Inspector stated that recommending these amendments “*does not undermine the participatory processes and sustainability appraisal that have been undertaken*”³.

Requirement for the Adoption Statement

- 1.5 In addition to the requirement in Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations (2012) for publishing the final SA Report alongside the Adopted Local Plan, the SEA Regulations also require a number of steps to be taken upon adoption of a local plan. Specifically, SEA Regulation 16 sets out the post-adoption procedures for the SEA, and requires that, as soon as reasonably practicable after the adoption of a plan for which an SA/SEA has been carried out, the planning authority must make a copy of the plan publicly available alongside a copy of the SA report and an ‘SEA adoption statement’, and inform the public and consultation bodies about the availability of these documents. The consultation bodies are Historic England, Natural England and the Environment Agency. The SEA adoption statement must explain:

¹ The Environmental Assessment of Plans and Programmes Regulations 2004 - SI No. 1633.

² Roger Clews on behalf of The Planning Inspectorate (2017) Report on the Examination of the Exmoor National Park Local Plan 2011-2031

³ *Ibid*

- How environmental (and sustainability) considerations have been integrated into the plan.
- How the Environmental Report (contained within the SA Report) has been taken into account during preparation of the plan.
- How the opinions expressed by the public, consultation bodies and where appropriate other European Member States, during consultation on the plan and Environmental/SA Report have been taken into account.
- The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with.
- The measures that are to be taken to monitor the significant environmental and sustainability effects of the implementation of the plan.

1.6 As the SEA process was incorporated into the SA process, this document constitutes the SA/SEA Adoption Statement for the Exmoor National Park Local Plan. The document is structured according to the SEA Regulation requirements listed above:

- **Section 2** summarises how environmental considerations have been integrated into the plan by explaining who carried out the SA/SEA and what assessment framework was used.
- **Section 3** summarises the links between the plan making and SA/SEA processes and how the SA/SEA recommendations were taken into account.
- **Section 4** summarises the consultation opinions provided on the SA/SEA at each stage and describes what changes were made to the SA/SEA process in response to these comments.
- **Section 5** describes the alternatives/options considered as part of the Local Plan preparation process, and why certain options were chosen.
- **Section 6** describes how the significant sustainability/environmental impacts of the Local Plan will be monitored.

2 How environmental and sustainability considerations have been integrated into the Local Plan

- 2.1 The SA (incorporating SEA) of was undertaken initially by Exmoor NPA and then independently by consultants on behalf of the NPA. Between 2011 and 2013, the SA work was carried out by Clare Reid Consultancy. LUC was appointed in January 2014 to undertake the remaining stages of SA, including this SA Adoption Statement. The various stages of SA undertaken are set out below.

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

- 2.2 A Scoping Report⁴ was produced, setting out what the SA should cover, providing a baseline of the environmental, social, and economic characteristics of Exmoor, reviewing a wide range of policy documents, monitoring and evidence, and identifying the key sustainability issues affecting Exmoor. A SA framework was developed, with a set of sustainability objectives and criteria to guide the preparation of the draft Plan. The Scoping Report was subject to public consultation in 2010.

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

- 2.3 In preparing the Local Plan, a broad range of options and alternatives were considered by Exmoor NPA. In 2011, Exmoor NPA prepared an SA for a range of issues and options, which were presented for consultation at 21 community events, under the banner ‘Your Future Exmoor’⁵. Further events were held with stakeholder organisations and members of the Authority. A subsequent consultation stage included strategic options for where development could go, alternatives for how affordable housing could be delivered, and the policy approaches that would help deliver sustainable development on Exmoor. The options were subject to SA⁶ and public consultation took place.

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

- 2.4 Following consultation on the broad options, the preferred strategy and policies were developed to form the Draft Local Plan. Each of the policies was assessed in order to consider the environmental, social and economic effects, and recommendations made to avoid or mitigate any potential adverse impacts. The Draft Local Plan and Sustainability Report⁷ were subject to informal public consultation during the autumn of 2013.

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

- 2.5 The results of the consultation on the 2013 Draft Local Plan were taken into account and the Local Plan was amended in the light of this. The Publication Draft version

⁴ Sustainability Appraisal Scoping Report, Exmoor National Park Authority (2010)

⁵ Your Future Exmoor Events Sustainability Appraisal Summary, Exmoor National Park Authority (2011)

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

⁷ Sustainability Appraisal Draft Exmoor National Park Local Plan Including Minerals and Waste Policies, Clare Reid Consultancy (2013)

was published by Exmoor NPA alongside the Sustainability Appraisal Report in June 2015⁸.

Phase 5 – Submission and Public Examination

- 2.6 After the Publication Draft Local Plan was submitted by Exmoor NPA to the Secretary of State for Examination, the Local Plan and consultation responses were considered by a Planning Inspector and public hearing sessions were held. Exmoor NPA subsequently prepared a schedule of Proposed Main Modifications to the Local Plan, at the request of the Inspector, taking into account the debate held during the public hearing sessions. The schedule of Proposed Main Modifications and Proposed Changes to Section 6 of the Local Plan⁹ were assessed to determine whether the modifications to the Local Plan would change any of the previous SA findings and the SA Report was updated to reflect those changes where relevant¹⁰. This SA Report was made available for consultation alongside the schedule of Proposed Main Modifications.
- 2.7 The purpose of the SA was to assist the NPA in preparing the Local Plan by identifying the key sustainability/environmental issues facing the plan area, predicting what would be the likely effects of the Local Plan on these issues, and to put forward recommendations to improve the Local Plan. The aim was to ensure that the Local Plan has as many positive effects as possible and that any negative effects are avoided or mitigated as far as reasonably possible when the policies are implemented.
- 2.8 The SA was undertaken iteratively, such that at each stage of the Local Plan's development an assessment of the sustainability and environmental effects of the options for the Local Plan and subsequently its policies was made. SA Reports were produced to describe the approach taken, identify the effects and put forward recommendations to avoid or minimise negative effects identified or enhance positive effects. In this way, environmental and sustainability considerations were integrated into the Local Plan as it was developed.
- 2.9 A set of SA objectives was used to describe, analyse and compare the environmental and sustainability effects of the Local Plan. The SA objectives for the Local Plan were developed by Exmoor NPA in collaboration with stakeholders, drawing on a review of relevant European, national and regional policies, plans and programmes and the objectives they contained. The resulting SA 'framework' comprised 14 SA objectives which were supported by a set of more detailed appraisal questions that were used to decide whether the Local Plan would be likely to achieve each objective.
- 2.10 The SA framework for the Local Plan was originally presented in the 2011 SA Scoping Report (prepared at the time for the proposed Core Strategy and Development Management Policies, which became the Local Plan) and included a set of SA objectives covering all of the SEA topics (listed in Schedule 2 of the SEA Regulations). This SA framework was the main tool used at each stage of the SA for assessing the likely effects of the options and policies for the Local Plan. Using the same SA Framework throughout the SA process ensured that all reasonable

⁸ LUC (2015) Exmoor Local Plan: Publication Draft Version (including minerals and waste policies) Sustainability Appraisal Report

⁹ Section 6, 'Achieving a Thriving Community', was updated to reflect evidence arising from the release of the DCLG 2014-based household projections: England 2014 – 2039. It was concluded that these changes would not change previous SA findings.

¹⁰ LUC (2016) Exmoor National Park Local Plan: Proposed Main Modifications (including minerals and waste policies) Sustainability Appraisal Report

alternatives (including policy options) were assessed using a methodology consistent with that used for the options previously considered as part of developing the Exmoor National Park Local Plan.

- 2.11 The SA framework for the Local Plan is shown in **Table 2.1**. The final column shows how the “SEA topics” (listed in Schedule 2 of the SEA Regulations as the topics to be covered in SEAs) were all covered by at least one of the SA objectives.

Table 2.1: SA Framework for the Exmoor National Park Local Plan

Topic	Objectives	Criteria - will the proposals in the Plan...	Indicators	SEA topic(s) covered by objective
Air Quality and Water Resources	<p>1. To minimise air pollution (including greenhouse gas emissions) and water pollution and ensure air and water quality is maintained or improved.</p> <p>Explanation: <i>This objective seeks to minimise pollution from development.</i></p>	<ul style="list-style-type: none"> • Maintain or improve air and water quality? • Minimise emissions from residential and commercial sources? • Reduce emissions from transportation sources? 	<ul style="list-style-type: none"> • Air quality Monitoring data – Environmental Health (WSC & NDC) • Domestic per capita CO2 (tonnes). • % of river length reaching grade A/B (Very good/good) quality for chemical and biological assessment. 	Air Water
Biodiversity and Green Infrastructure	<p>2. To conserve and enhance biodiversity and to protect, conserve and enhance all habitats and species.</p> <p>Explanation: <i>These objectives seek to conserve and enhance Exmoor’s biodiversity, habitats and species so that any negative impacts from development are avoided or mitigated when meeting the needs of communities and visitors.</i></p>	<ul style="list-style-type: none"> • Conserve and enhance the diversity of species? • Conserve and enhance the diversity of habitats? • Make provision for protected and important species and habitats where appropriate? • Have no adverse impact on SACs or SSSIs? • Enhance local biodiversity and the natural environment? 	<ul style="list-style-type: none"> • Area of new BAP habitat created or restored. • Number of SACs and SSSIs in favourable or unfavourable recovering condition. • Proportion of Local Wildlife Sites where positive conservation management has been or is being implemented (NI197). • Number of applications with provision for protected/important species. • Number of applications with provision for protected/important habitats. 	Biodiversity Flora Fauna

Topic	Objectives	Criteria - will the proposals in the Plan...	Indicators	SEA topic(s) covered by objective
			<ul style="list-style-type: none"> • 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 and habitats.</p> <p>Explanation: <i>These objectives seeks to manage and minimise the impacts of climate change and flood risk and help communities and habitats to adapt as appropriate.</i></p>	<ul style="list-style-type: none"> • Put properties at risk of flooding? • Provide development in the flood plain? • Provide development in areas vulnerable to coastal change? • Put communities and habitats vulnerable to the effects of climate change at risk? 	<ul style="list-style-type: none"> • Number of planning permissions granted contrary to Environment Agency advice on flood defence grounds. • Number of permissions which make a positive contribution to sustainable flood management. (include SUDS proposals) • Number of planning permissions in areas vulnerable to coastal change. • Number of planning permissions for structures and measures to adapt to the impacts of climate change e.g. coastal defences. 	Climatic Factors Water Human Health Biodiversity Flora Fauna

Topic	Objectives	Criteria - will the proposals in the Plan...	Indicators	SEA topic(s) covered by objective
Climate Change Mitigation and Energy	<p>5. To minimise the net emissions of carbon dioxide and other greenhouse gases into the atmosphere and to minimise Exmoor's contribution to global climate change.</p> <p>Explanation: <i>This objective seeks to minimise greenhouse gas emissions, promote sustainable living, implement sustainable building practices and install renewable 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). 	Climatic Factors Material Assets Air

Topic	Objectives	Criteria - will the proposals in the Plan...	Indicators	SEA topic(s) covered by objective
<p>Community and Wellbeing (including equalities and health)</p>	<p>6. To promote and support thriving and inclusive communities, health and wellbeing.</p> <p>Explanation: <i>this objective focuses on securing balanced, inclusive communities where people can live healthy lives, have equality of access to community, education and health services and facilities, and have access to and enjoy cultural and recreational opportunities.</i></p>	<ul style="list-style-type: none"> • Provide for community services? • Encourage healthy lifestyles? • Improve access to the Park and to its opportunities and facilities for all? • Create new access opportunities where appropriate? • Help to implement the installation of infrastructure for broadband and mobile technology that is sympathetic to the National Park setting? • 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? 	<ul style="list-style-type: none"> • Amount of open access land available under the CROW Act 2000. • Index of multiple deprivation and measures of health deprivation. • Number of cultural, leisure and sporting facilities available. • Number of village shops and village post offices available. • Creation and loss of community services and facilities. • Number of planning permissions providing disabled access. 	<p>Population Human Health</p>

Topic	Objectives	Criteria - will the proposals in the Plan...	Indicators	SEA topic(s) covered by objective
		<ul style="list-style-type: none"> • 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? 		

Topic	Objectives	Criteria - will the proposals in the Plan...	Indicators	SEA topic(s) covered by objective
Economy and Employment	<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>Explanation: <i>This objective seeks to support and enhance the key sectors of the Exmoor economy and at the same time support the growth of small businesses. Economic development will be appropriate to the National Park setting and where possible will benefit from and help to promote the National Park's special qualities.</i></p>	<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 & B8). 	Material Assets Population

Topic	Objectives	Criteria - will the proposals in the Plan...	Indicators	SEA topic(s) covered by objective
			<p>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. 	

Topic	Objectives	Criteria - will the proposals in the Plan...	Indicators	SEA topic(s) covered by objective
Historic Environment	<p>8. To maintain and enhance the quality of the built environment.</p> <p>Explanation: <i>This objective seeks to maintain and enhance the built and historic environment of Exmoor through allowing sympathetic and sustainable design and alteration of new and existing buildings.</i></p>	<ul style="list-style-type: none"> • Conserve the character of historic landscapes? • Conserve the character of settlements and buildings? • Protect and enhance ancient monuments and other heritage assets? • Recognise the potential of the historic environment to contribute to social and economic progress. • Improve access and understanding of local heritage. • Promote a standard of quality in new building design? • Encourage use of local and traditional and sustainable buildings products and materials? • Enhance the distinctiveness and diversity of the local 	<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. 	Cultural heritage

Topic	Objectives	Criteria - will the proposals in the Plan...	Indicators	SEA topic(s) covered by objective
		built environment and community spaces?		
Housing	<p>9. To help ensure that National Park-communities have access to appropriate, good quality, sustainable, affordable housing.</p> <p>Explanation: <i>This objective seeks to provide housing to maintain balanced living and working communities and in doing so provide a sustainable mix of affordability, size and type of housing that is of good design and sustainable materials and provides for the needs of young and older people and those whose work is important to communities.</i></p>	<ul style="list-style-type: none"> • Provide affordable housing? • Provide for the housing needs of older people? • Provides for the housing needs of young people? • Provides for those whose work is important to the conservation of the National Park and viability of communities? • Provides for the needs of agricultural and forestry workers? • Ensures affordable housing remains affordable in perpetuity? • Housing development makes good use of existing land and buildings? • Conserves and 	<ul style="list-style-type: none"> • The proportion, tenure and type of affordable dwellings approved and constructed. • Who is the affordable housing for? i.e. a worker, a local connection etc. • Mean and median average house prices. • Average house price to average household income ratio. • Average annual increase in house price. • Number of planning permissions for annexe accommodation. • Number of agricultural and forestry dwellings permitted. • Housing development from existing land or buildings (brownfield land). • Housing development that incorporates energy and sustainability measures (above building regulation requirements). 	Population Material Assets

Topic	Objectives	Criteria - will the proposals in the Plan...	Indicators	SEA topic(s) covered by objective
		<p>enhances the special qualities of the National Park?</p> <ul style="list-style-type: none"> • Helps development to incorporate energy and sustainability measures? • Provides a better mix of sizes, types and affordability. 	<ul style="list-style-type: none"> • 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> <p>Explanation: <i>Although the</i></p>	<ul style="list-style-type: none"> • Promote sustainable mineral extraction? • Promote the reuse of land and buildings? • Protect the best and most versatile land from development? • Contribute to the reduction, reuse and recycling of waste? • Contribute to appropriate waste treatment and disposal? • Minimise the risk of contaminated? • Reduce soil quantity and quality? 	<ul style="list-style-type: none"> • Number of planning permissions built on previously developed land. • Loss of the best and most versatile agricultural land to development (need a GIS layer available on PACS). • Loss of greenfield land to development. • Percentage of waste generated, recycled, composted and sent to landfill. • Number of planning permissions for redevelopment of contaminated sites. • Number and type of mineral 	<p>Soil Material Assets</p>

Topic	Objectives	Criteria - will the proposals in the Plan...	Indicators	SEA topic(s) covered by objective
	<p><i>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>applications permitted.</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 	<p>Landscape</p>

Topic	Objectives	Criteria - will the proposals in the Plan...	Indicators	SEA topic(s) covered by objective
			attached to planning permissions.	
Coast	<p>13. To protect and/or enhance coastal areas.</p> <p>Explanation <i>This objective aims to protect and/or enhance coastal areas and minimise the effects of coastal change on communities, the cultural heritage and habitats at risk from the effects of climate change. In some circumstances the coast cannot be feasibly protected in the long term and adaptation measures which enhance the coastal area will be necessary.</i></p>	<ul style="list-style-type: none"> 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. 	Climatic Factors Cultural Heritage Population Human Health Biodiversity
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</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 	<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. 	Material Assets Climatic Factors Human Health Air

Topic	Objectives	Criteria - will the proposals in the Plan...	Indicators	SEA topic(s) covered by objective
	<p><i>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>	<p>for safe horse-riding, cycling and walking as an alternative to car travel?</p> <ul style="list-style-type: none"> • 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? 		

- 2.12 In addition to the use of the SA framework to assess the potential effects of Local Plan objectives and policies as they were drafted, environmental and sustainability considerations were integrated into the Local Plan through close working initially between Clare Reid Consultancy and Exmoor NPA officers drafting the plan and later LUC. Clare Reid Consultancy and LUC each worked with NPA officers to discuss and agree the scope of, and approach to, the SA throughout the development of the Local Plan. Draft sections of the Publication Draft Local Plan, including draft policies, were sent to LUC for appraisal and the SA team discussed the likely sustainability implications of the emerging plan during the process of carrying out the SA and plan making.
- 2.13 Finally, the Local Plan was also the subject of a Habitats Regulations Assessment (HRA) under the Conservation of Habitats and Species (Amendment) Regulations 2012¹¹. The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European designated site for nature conservation and to ascertain whether it would adversely affect the integrity of that site. The HRA process for the Exmoor National Park Local Plan was undertaken separately from the SA, by Somerset Ecology Services. The findings of the HRA Reports informed the SA process, particularly in relation to judging the potential effects of the Local Plan against the SA objective **Biodiversity and Green Infrastructure**.
- 2.14 The HRA identified a number of settlements where the presence of internationally important habitats and protected species would need to be taken into account, and any development requiring land take may require a test of likely significance under the Habitats Regulations 2010. In a draft version of the 2015 SA report it was recommended that the relevant settlement descriptions in Chapter 10 of the Local Plan make reference to European designated sites that are in close proximity – this recommendation was addressed in the Publication Draft Local Plan (2015). The HRA Addendum¹² considered whether the proposed Main Modifications and changes to Section 6 of the Local Plan would have implications for the previous conclusions of the HRA that the Local Plan would not result in adverse effects on integrity of any European sites. The HRA Addendum concluded that no significant effects were likely to arise as a result of the Local Plan, including the Main Modifications, as any potential effects would be counter-acted by others measures within the plan, specifically Policy CE-S3 Biodiversity and Green Infrastructure.

¹¹ Statutory Instrument 2012 No. 1927.

¹² Somerset County Council (2016) Proposed Main Modifications and Proposed Further Changes to Section 6 of the Local Plan, Habitats Regulations Assessment Addendum

3 How the Environmental/SA Report has been taken into account

- 3.1 As stated above, the SA was undertaken iteratively, such that an assessment of the sustainability and environmental effects was made at each stage of the Local Plan's development. SA Reports were produced to describe the approach taken, the potential effects identified and put forward recommendations to avoid or minimise negative effects or enhance positive effects. Exmoor NPA officers preparing the Local Plan took the SA findings and recommendations into account while making changes to the Plan before each round of public consultation.
- 3.2 **Table 3.1** overleaf shows how preparation of the SA Reports (including the Environmental Report requirements) corresponded with each stage of the Local Plan preparation, and how any recommendations made were taken into account. In most cases, drafts of the SA Reports were provided to the NPA prior to the Local Plan documents being finalised for consultation.

Table 3.1: Iterations of the Exmoor National Park Local Plan and accompanying SA work

Plan Iteration	Accompanying SA Work	How SA Report was taken into account
N/A	SA Scoping Report (June 2011) produced by Exmoor National Park Authority	<p>The scoping stage of the SA was undertaken by Exmoor NPA officers and involved compiling information about the social, economic and environmental baseline for the plan area as well as the policy context and key sustainability issues. The SA framework was then developed, setting out the SA objectives against which plan options and policies would be appraised. LUC prepared an update to the baseline information as presented in the June 2015 and December 2016 SA Reports.</p> <p>The primary purpose of a Scoping Report is to set the scope and objectives for the SA and therefore it has a limited role in influencing the Local Plan itself.</p>
Your Future Exmoor Consultation (2010)	Your Future Exmoor, Sustainability Appraisal Summary (July 2011) produced by Exmoor National Park Authority	<p>During January to March 2010, the National Park Authority held a series of 21 community engagement events entitled ‘Your Future Exmoor’. These events followed three scoping workshops held with representatives of stakeholder organisations during December 2008 and January 2009 that scoped the range of issues and options facing the National Park in terms of land use and development. The outcomes helped to develop the issues, options and questions that informed the early stages of Local Plan development. This represented the Issues and Options stage of plan making.</p> <p>Following these consultation activities, Exmoor NPA produced a Sustainability Appraisal Summary, which provided commentary on the issues and options presented at consultation events to give an indication of which options were more favourable in sustainability terms. The issues and options presented during consultation and discussed in the Your Future Exmoor SA Summary were generally high level. The options presented were not necessarily mutually exclusive. For many topic areas, there were no reasonable alternatives as the policy approach is set out at the national level in the NPPF. It was recognised that many of the likely sustainability effects would be more easily determined as policies that are more specific were developed from the options and taken forward to inform the draft plan.</p>

<p>Vision and Objectives, General Policies and Strategic Options Consultation (November 2011)</p>	<p>SA Report for the Vision and Objectives, General Policies and Strategic Options Consultation (October 2011) produced by Clare Reid Consultancy</p>	<p>The NPA took into account the SA findings for the Issues and Options as it prepared its vision and objectives for the Local Plan and a range of options for addressing the key strategic issues facing the National Park. This included options for where development could go, alternatives for how affordable housing could be delivered, and the strategic policy approaches that would help deliver sustainable development on Exmoor (General Policies).</p> <p>The likely significant effects of the options for the Local Plan (both positive and negative) were clearly described and recommendations about the implementation of the plan were made. Potential mitigation measures that may be necessary were also identified.</p> <p>The draft SA was made available to the NPA prior to publication of the consultation document. This resulted in a number of changes to the draft General Policies 1-3, which are detailed in the SA Report. For example, the wording of Policy GP1 was amended to strengthen and support the vision and objectives, rather than just avoid adverse effects on them. Policy GP2 was amended to make reference to health and community participation and safe, attractive public spaces. Policy GP3 was amended to refer to the duty on NPAs to foster social and economic wellbeing of their communities¹³.</p>
<p>Draft Local Plan (November 2013)</p>	<p>SA Report for the Draft Local Plan (October 2013) produced by Clare Reid Consultancy</p>	<p>Following the Vision and Objectives, General Policies and Strategic Options Consultation and the accompanying SA Report, the NPA developed the preferred strategy and policies to form the draft Local Plan. The SA assessed each of the policies included in the draft Local Plan to consider the environmental, social and economic effects of these. The SA also made recommendations to avoid or mitigate any potential adverse effects. The SA considered the cumulative effects of the draft Local Plan, which concluded that there would be a range of positive and negative cumulative effects.</p> <p>The SA recommended mitigation measures for each of those policies assessed as having potential negative impacts. The exception to this was in relation to negative effects identified in relation to transport, housing and economy objectives, due to the overriding importance of the National Park statutory purposes to conserve the landscape, wildlife and cultural heritage and promote understanding and enjoyment. Mitigation suggestions</p>

¹³ Policy numbering here reflects that used in the October 2011 SA. Policy numbering was updated in the consultation version of the Local Plan.

		<p>were reviewed by the NPA and fed into the refinement of policies e.g. amendments were made to policy CE-S8 to require safeguards to human health and the natural environment; and policies HC-D3 and HC-D8 were amended to ensure cross-references to policies relating cultural heritage, climate change and flood risk.</p>
<p>Publication Draft Local Plan (June 2015)</p>	<p>Exmoor Local Plan: Publication Draft Version (including minerals and waste policies) Sustainability Appraisal Report (June 2015) produced by LUC</p>	<p>Following consultation on the 2013 Draft Local Plan, Exmoor NPA produced the Publication Draft Local Plan in June 2015. This took into account comments received during the consultation process and the results of the previous SA work. A new SA Report was produced by LUC, detailing all SA work to date and SA matrices prepared previously in relation to the 2013 Draft Local Plan were updated to reflect the changes made to the Publication Draft Local Plan. The SA also identified where other Local Plan policies may provide mitigation for the potential negative effects identified.</p> <p>LUC made a draft version of this SA Report available to the NPA prior to finalisation of the Publication Draft Local Plan. The final SA Report for the Publication Draft Local Plan described the recommendations that were made and how they had been addressed. For example, Policy HC-S7 was amended to refer to climate change mitigation and adaptation, with particular reference to flood risk. In addition, this policy now encourages sustainable resource use and renewable energy provision.</p> <p>The June 2015 SA Report was submitted to the Secretary of State alongside the Local Plan in May 2016.</p>

<p>Proposed Main Modifications (January 2017)</p>	<p>Exmoor Local Plan: Proposed Main Modifications (including minerals and waste policies) Sustainability Appraisal Report (December 2016) produced by LUC</p>	<p>The examination hearing sessions for the Local Plan were held in July 2016. Following these hearings, the NPA prepared a schedule of proposed Main Modifications, which addressed matters discussed at the hearings and recommendations from the Inspector. At this time, the NPA also proposed a series of further changes to section 6 of the Local Plan, as a result of new evidence arising from the release of the 2014-based household projections¹⁴. The Proposed Main Modifications and Further Changes to Section 6 were reviewed by LUC to determine whether they would change any of the previous SA findings on the Local Plan. Some Main Modifications required updates to previous SA work, but none of the further changes to section 6 had implications for previous SA findings.</p> <p>The Main Modifications SA updated the Publication Draft Local Plan SA Report and was therefore a full SA Report. Where Main Modifications were deemed to have implications for previous SA findings, the relevant policy was re-assessed accordingly and the assessment text explained the change.</p> <p>This SA Report concluded that no further recommendations were necessary as a result of the changes to the SA necessitated by the Main Modifications.</p>
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¹⁴ DCLG (12 July 2016) 2014-based Household Projections: England, 2014-2039

4 How opinions of consultation bodies and the public have been taken into account

- 4.1 At each stage of the Local Plan's development, an SA Report was published alongside the Local Plan for consultation with the consultation bodies specifically relating to the SEA Directive (i.e. Historic England, Environment Agency and Natural England), a range of other organisations, such as surrounding local authorities and, for the full SA Reports, the public. The SEA Regulations require the SEA Adoption Statement to summarise how any opinions expressed by the public and the consultation bodies about the SEA have been taken into account.
- 4.2 The Local Plan consultation stages and responses received relating to the SA Reports are summarised below.

SA Scoping Report (June 2011)

- 4.3 The SA Scoping Report was subject to consultation between November and December 2010. The statutory consultees (Natural England, Historic England and Environment Agency) were invited to comment on the Scoping Report, along with a range of other, relevant organisations, including:
- English National Park Authorities Association (ENPAA)
 - Council for National Parks
 - Government Office for South West
 - Devon County Council
 - Somerset County Council
 - North Devon District Council
 - West Somerset Council.
- 4.4 Following the consultation period, the SA Scoping Report was amended with regard to the responses made and published on the NPA website. Through this process, the sustainability objectives were agreed and these were used to determine the sustainability of the strategic options and the policies within the Local Plan.

Your Future Exmoor, Sustainability Appraisal Summary (July 2011)

- 4.5 This document was not subject to consultation as its primary purpose was to provide a record of the Your Future Exmoor consultation, rather than being a full SA Report.

SA Report for the Vision and Objectives, General Policies and Strategic Options Consultation (October 2011)

- 4.6 This SA Report was subject to public consultation between November 2011 and January 2012. Few comments were received concerning the Sustainability Appraisal and these comments were in agreement with the recommendations of the SA concerning General Policy 1.

SA Report for the Draft Local Plan (October 2013)

- 4.7 This SA report was published for consultation in November to December 2013. Historic England responded saying they had no comments to make. The only other response was from Natural England, who were satisfied that the SA had provided a systematic assessment of the plan. Natural England suggested that *“the next iteration of SA should explain the plan's relationship to those of neighbouring authorities which would demonstrate how these have been taken into account in the preparation of the plan”*.
- 4.8 In response to Natural England's comments, the SA of the Publication Draft Local Plan (see below) included a section explaining the relationship between the Exmoor Local Plan and the neighbouring authorities' plans.

Exmoor Local Plan: Publication Draft Version (including minerals and waste policies) Sustainability Appraisal Report (June 2015)

- 4.9 This SA report was published for consultation alongside the Publication Draft Local Plan from June to July 2015. No specific representations were received relating to the 2015 SA Report for the Publication Draft Local Plan.

Exmoor Local Plan: Proposed Main Modifications (including minerals and waste policies) Sustainability Appraisal Report (December 2016)

- 4.10 The December 2016 SA Report was published for consultation in January and February 2017. No specific representations were received relating to the SA Report.

5 Why the adopted Local Plan was chosen in light of reasonable alternatives

- 5.1 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 consultation in 2011¹⁵.
- 5.2 The preferred option that was initially taken forward in the Local Plan was to allow new development (provided a number of criteria are met) in all settlements listed in the existing Local Plan and 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.
- 5.3 After the Draft version of the Local Plan was published in 2013, the ‘Rural Communities’ tier of settlements was removed from the spatial strategy in response to changes to Government policy in relation to Section 106 thresholds for affordable housing. However, the policy approach remains the same in that opportunities for local affordable self-build housing are still provided for in small rural communities within the open countryside – this is explained in the text preceding GP3 and in policy HC-D5 Custom/Self Build Local Need Housing in Rural Communities. Therefore, the overall strategy achieves the same outcomes as proposed in the Draft Local Plan.
- 5.4 The option that has been taken forward for the delivery of housing is to focus on the provision of affordable housing, but in some circumstances to allow market housing to cross-subsidise this. There is also allowance for accessible and adaptable housing to address an identified need for older people and other vulnerable members of the community who have a local connection. There will be both positive and negative impacts of this approach to housing provision in sustainability terms. The focus on providing affordable housing will be positive for local communities and local businesses that need local workers. The use of market housing (with a principal residence tie) to cross-subsidise this is a pragmatic approach given reductions in public funding for affordable housing, but it could lead to the limited stock of suitable land being used up more quickly. There is no provision for housing solely to meet open market demand as this is likely to have substantial negative

¹⁵ Sustainability Appraisal Report – Local Plan Vision, Objectives, General Policies and Options, (2011) prepared by Clare Reid Consultancy for Exmoor National Park Authority

impacts on the landscape sensitivity of the National Park. It is considered unsustainable to deliver likely levels of future housing demand within the National Park, due to significant negative impacts on environmental assets, which would be at odds with the National Park's statutory purposes '*to conserve and enhance the natural beauty, wildlife and cultural heritage; and to promote opportunities for the understanding and enjoyment of the special qualities (of the National Parks) by the public*'¹⁶.

- 5.5 The options considered for each policy area were assessed as part of the Your Future Exmoor issues and options consultation, to give an indication of which options are more favourable in sustainability terms. For many topic areas, there are no reasonable alternatives as the policy approach is set out at the national level in the NPPF.
- 5.6 The SA has been an iterative process. During the preparation of the 2013 SA Report for the Draft Local Plan, the policies were subject to an initial assessment as they were drafted and recommendations were made to improve their sustainability effects. This process was documented in detail in the October 2013 SA Report. The changes that were made to the policies in the Publication Draft Local Plan were mainly fairly minor changes to the wording of policies, although a small number of policies were deleted or added, as described in the June 2015 and December 2016 SA Reports.

¹⁶ National Parks and Access to the Countryside Act 1949, as amended by the Environment Act 1995

6 How will the environmental and sustainability effects of the Local Plan be monitored?

- 6.1 The SEA Regulations require that “The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action” (Regulation 17), and that the environmental report should provide information on “a description of the measures envisaged concerning monitoring” (Schedule 2).
- 6.2 The Government’s latest SA Guidance in the National Planning Practice Guidance¹⁷ states that details of the proposals for monitoring the significant effects of implementing the adopted local plan should be included in the Sustainability Appraisal report, or the post-adoption statement (i.e. this document). Paragraph 15.28 and Appendix 3 of the December 2016 Publication Draft SA addressed this requirement, presenting monitoring indicators alongside the SA framework. This is presented in **Table 2.1** of this document.

LUC

July 2017

For further information, please refer to the Exmoor National Park Authority website:

www.exmoor-nationalpark.gov.uk

¹⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-local-plans/>