



A Sustainable Future for Exmoor

National Park Management Plan

Sustainability Appraisal

(including Strategic Environmental Assessment)

DRAFT REPORT

for

Public Consultation

November 2006

Your comments are invited on the following draft Sustainability Appraisal of the emerging Objectives and Targets for the proposed "A Sustainable Future for Exmoor" plan.

Comments are also invited regarding the accompanying "A Sustainable Future for Exmoor" plan; which proposes how the environment, communities and economy of Exmoor National Park should develop between 2007-2012. (see separate document).

Please send your comments, preferably using the attached Consultation Response Form, by 5.00pm 5 January 2007 at the latest, to:

Exmoor National Park Authority
Exmoor House
Dulverton
Somerset TA22 9HL

info@exmoor-nationalpark.gov.uk

This Document

Exmoor National Park Authority (ENPA) is taking the lead on the partnership venture of agreeing a five year (2007-2012) plan to develop Exmoor, entitled "A Sustainable Future for Exmoor".

The **purpose** of this Sustainability Appraisal is to ensure that the final outcomes, objectives and targets put forward in the main "A Sustainable Future for Exmoor" plan will adapt and change Exmoor's environment, communities and economies in ways which provide future generations with sufficient resources to sustain themselves on Exmoor, whilst ensuring that environments, communities and economies in other parts of the country and world can also sustain themselves, today and in to the future.

The Sustainability Appraisal **will achieve this purpose** by:

- 1) evaluating the emerging desired outcomes, objectives and targets put forward in the main "A Sustainable Future for Exmoor" plan
- 2) identifying the significant sustainability problems or benefits likely to result from how the emerging objectives will be delivered, and
- 3) proposing additions and amendments to the outcomes, objectives and targets (thereby guiding the iterative development of the "A Sustainable Future for Exmoor" plan).

The evaluation will be conducted against a suite of nationally and regionally accepted Sustainability Objectives.

This Sustainability Appraisal **must be read in conjunction with the main "A Sustainable Future for Exmoor" plan**; both will evolve until final adoption in April 2007. The Sustainability Appraisal will continue to 'accompany' the delivery and monitoring of the "A Sustainable Future for Exmoor" plan.

This draft document is intended to:

- help readers to engage with the consultation on the "A Sustainable Future for Exmoor" plan, by focusing on the key sustainability issues and implications; whilst
- meeting the legislative and policy requirements for consultation, and providing a firm base for the future development of both the sustainability appraisal and the main "A Sustainable Future for Exmoor" plan into robust and appropriately comprehensive documents.

Contents

1.0 Executive Summary

Section A – Background

2.0 The strategic and policy context

2.1 Environment Act

2.2 UK Sustainable Development Strategy

5 Principles, 4 Priorities

2.3 SW Sustainable Development Framework

SW evidence relating to the 4 National Priorities

10 Operating Principles

2.4 SW Integrated Regional Strategy

3.0 The legal reasons for this document

Sustainability Appraisal &
Strategic Environmental Assessment

Section B – The Sustainability Appraisal

4.0 The role of appraisal

5.0 The Appraisal Matrix explanation

Coverage of SEA topics by SSA Framework

Table 1 – The Detailed Definitions of the Appraisal Matrix

Table 2: The Sustainability Appraisal of the Objectives and Targets of the “A Sustainable Future for Exmoor 2007-2012” Plan.

Appendices

- 1 Secretary of State for the Environment, Food and Rural Affairs letter to Prime Minister July 2006.
- 2 One Planet Living baseline data
- 3 Energy – the SW in Context
- 4 Integrated Regional Strategy indicators
- 5 Operations on Exmoor Sustainability Checklist
- 6 Sustainable Building & Groundworks on Exmoor Checklist

1.0 Executive Summary

1.1 The ways in which the Exmoor environment is currently managed and the ways individuals on Exmoor lead their domestic and working lives cannot be sustained in the future; over five planets would be required if everyone in the world lived as we do in North Devon & West Somerset.

1.2 This Appraisal is not just a test of consistency with current Government policies for National Park Authorities: it aims to help the "A Sustainable Future for Exmoor" plan work towards sustainability.

1.3 This Appraisal is a tool; inclusion of an appraisal criterion (for example on reducing fossil-fuelled road travel) does not instantly veto all road travel. It does ensure that the full range of sustainability consequences of options or choices are made clear so that ultimately political choices about policies can take these into account.

1.4 This Sustainability Appraisal has assessed the objectives and targets of the plan, entitled "A Sustainable Future for Exmoor", that is emerging for developing Exmoor between 2007 & 2012 against 6 **Sustainability Objectives**:

- 1) Minimise consumption of natural resources
- 2) Maintain and improve environmental quality and assets
- 3) Provide access to meet people's needs with least damage to communities and the environment
- 4) Develop the economy in ways that meet people's needs
- 5) Support communities that meet people's needs
- 6) Improve health

1.5 These Sustainability Objectives cover the objectives of the EU SEA Directive, UK Sustainable Development Strategy, South West Sustainable Development Framework and SW Integrated Regional Strategy.

1.6 The significant **sustainability findings** (in relation to the 6 Sustainability Objectives) arising from this assessment of the "A Sustainable Future for Exmoor" plan are:-

- 1) delivering the majority of objectives will continue the use of fossil fuels and emission of climate changing CO₂.
The objectives to increase renewable energy installations and establish distribution and servicing facilities for re-processed vegetable oil biodiesel powered vehicles are good. The objectives to plant trees & increase the use local certified timber and enhance the local food & drink supply chains clearly seek to minimise use of natural resources and emissions of processing and distribution those products;
- 2) there are many objectives and targets which will conserve & enhance local habitats, species and aspects of the historic environment. The emerging priority landscape objective is to keep scrub vegetation and trees off the hill tops, to ensure the continuation of [Ex]moorlands;
- 3) there are few objectives which will provide access to meet people's needs with least damage to communities and the environment;
- 4) There are good objectives to strengthen elements (timber, food and drink, outdoor pursuits, renewable energy) of the Exmoor environmental economy;
- 5) there are a few objectives which will support communities that meet people's needs, notably the affordable housing objectives; this aspect of sustainability is the focus of the Exmoor Local Development Scheme;

- 6) there are some objectives which will improve health, notably minimising noise pollution, and others (such as the Rights of Way objectives) which give people opportunity to improve their physical and mental health.

1.7 The significant **sustainability 'crunch' issues** (in relation to the 6 Sustainability Objectives) arising from this assessment of the "A Sustainable Future for Exmoor" plan are:-

- 1) the targets to increase renewable energy installations (appropriate to the National Park) and establish distribution and servicing facilities for re-processed vegetable oil biodiesel & renewably-recharged electrically powered vehicles need Lead Organisations to deliver the activities. The targets need increasing to make a significant impact towards reducing CO2 emissions by 60% (from 1990 baseline) by 2030.

The target to develop a Strategy to realise a Carbon Neutral National Park by 2040 needs prioritising;

- 2) many of the landscape, habitat and species objectives & targets rely upon livestock grazing land. The proposed budgets for the Higher Level Environmental Stewardship scheme (HLS) across the SW could mean many Exmoor farms do not gain HLS status. This could lead to a decline in livestock numbers on Exmoor farms by 2010 that will significantly affect the ability to achieve landscape, habitat and species targets. Explicit, strengthened objectives and targets might need considering to
 - a) negotiate a dedicated Exmoor farm payment scheme;
 - b) ensure that the local food economy develops more rapidly, with local people being prepared to pay an 'Exmoor supplement' on the locally reared meat they buy; and only to buy local meat;
 - c) rapidly increase the distribution of Exmoor ponies as conservation grazers (target E4.1).

If these targets are not strengthened / adopted, fields and moorland may scrub up in many places, undermining landscape and wildlife objectives.

- 3) the target to establish distribution and servicing facilities for re-processed vegetable oil biodiesel & renewably-recharged electrically powered vehicles need increasing to make a significant impact if people's access to their everyday needs are to met with least damage to the environment.

In this deeply rural area, it is highly unlikely that the necessary investment in public transport to enable the majority of people and tourists to not use their cars will ever be prioritised.

An objective and targets for community transport should be included.

- 4) Communication between groups of people in Exmoor's settlements and the public authorities needs to be streamlined. The proposed move to a unitary County Council exposes threats to effective liaison. There is also an opportunity for Public Authorities to jointly employ **area-based regeneration & development officers** (e.g. paid, full-time Parish Clerks, Scottish NPA's Community Officers, MCTI officers) who can enable more appropriate & targeted delivery of support and services within communities, local businesses and from public authorities. This could aid the work of the many public sector project officers who are tasked with improving health, democracy, education, training in settlements.

- 5) There are many volunteering and training opportunities which could improve physical and mental health and could be embedded in the delivery of many of the Objectives and Targets. Establishing **deeper and wider links between conservation and community volunteering programmes** would enable many more people to have awareness about and skills relating to the sustainable management of Exmoor.

1.8 The **two overarching Sustainability Recommendations** for implementing the "A Sustainable Future for Exmoor 2007 - 2012" plan are

ONE) these **Sustainability Operating Principles** (Regional Sustainable Development Framework, 2006) should be formally adopted by all Lead Organisations in the Plan:

✓ **Be resource wise**

Adopt high energy, water and resource efficiency at home and at work, maximise the use of local, renewable energy; minimise waste and prevent pollution

✓ **Improve equality in meeting basic needs**

Support universal access to decent, affordable and adaptable housing, essential goods & services and safe and satisfying employment, learning, and leisure opportunities

✓ **Enhance regional and local distinctiveness and diversity**

Protect and enhance our natural and cultural resources and heritage and celebrate diversity and distinctiveness

✓ **Promote health and well-being**

Support physical and mental well-being through healthy, balanced lifestyles and the provision of a clean, safe and green environment

✓ **Use local and ethical goods & services**

Use locally/regionally sourced goods and services to boost our economy, supported by ethical sourcing to support people in other parts of the world

✓ **Reduce high carbon travel**

Support low carbon access through planning and innovation (eg demand-responsive public transport, home-working, mobile services, video-conferencing, online facilities, local multi-service centres and alternative fuels)

✓ **Help everyone to join in public decision-making**

Support wider, more informed participation in public and community decision-making to foster citizenship and involve people in the solutions to local and global challenges

✓ **Develop sustainability learning and skills**

Explain and promote the 'what', 'why' and 'how' of sustainability and develop 'systemic thinking' and professional skills to support sustainable solutions

✓ **Support thriving low carbon economies**

Boost the economy whilst reducing carbon emissions by promoting low carbon approaches, technologies and employment opportunities (eg sustainable construction and renovation, environmental management, local/regional supply chains and environmental technology)

✓ **Take a long term approach**

Ensure the social, economic and environmental sustainability and success of whatever you do by thinking ahead to the next 5 to 50 years and beyond!

TWO) To implement these Operating Principles, all Lead Organisations should use the "**Operations on Exmoor Sustainability Checklist**" (Appendix 5) and "**Sustainable Building & Groundworks on Exmoor Checklist**" (Appendix 6) when planning ANY project to deliver a Plan Target.

1.9 **Table 2** details the Sustainability Comments against every Target of each Objective.

These Comments are both philosophical and pragmatic, in pursuing the sustainable development of Exmoor. The Comments also act as a 'critical friend' by prompting certain Targets to be further developed to make them Specific, Measurable, Achievable, Realistic and Time Related.

Where the comments recommend opportunities for additional or different approaches are not the only or necessarily the best ways to deliver the Objectives & Targets, will not be appropriate or even possible in all circumstances, often need actions that go beyond the scope of a National Park Management Plan, and may be limited or sacrificed for the sake of policy objectives which may take precedence due to the Environment Act 1995.

Section A

Background

2.0 The strategic and policy context

"A Sustainable Future for Exmoor", as an integrated plan for how the place and people of Exmoor National Park will develop, up to and beyond 2012, has to be in harmony with, and cannot be in contradiction to, the principles and priorities of the current UK Sustainable Development Strategy (UK SDS), the South West Regional Sustainable Development Framework (SW RSDF) and South West Integrated Regional Strategy "Just Connecting".

2.1 Environment Act 1995

2.1.1 Within the context of these strategies, in the National Park it is also essential to make sure that all policy development focuses on and prioritises the Purposes of National Parks and Duty of National Park Authorities set out in the Environment Act 1995.

2.1.2 The Purposes are to:

- Conserve and enhance natural beauty, wildlife and cultural heritage
- Promote opportunities for the understanding and enjoyment (of the Parks) by the public

In pursuing these purposes the Authority has a Duty to:

- Seek to foster the social and economic well-being of local communities

2.1.3 Since the National Park Authority is bound by the purposes and duty set out in the Environment Act, this document seeks to embed the SA/SEA process firmly within them.

2.2 The UK Sustainable Development Strategy (UK SDS)

2.2.1 The combined set of objectives and targets must ensure that both how and what the people of, and visitors to, Exmoor do in living (work & play) and moving within and across the Exmoor landscape and environment are in ways which enable 'One Planet Living':

"The idea is simple: if everyone in the world were to consume natural resources and generate carbon dioxide at the rate we do in the UK, we'd need three planets to support us. We are depleting our natural resources at a far faster rate than we are replenishing them. We need instead to move towards a one-planet economy and one planet living – where there is balance between what we give and what we take. This means deep reductions in CO₂ and other greenhouse gas emissions to a level the planet can sustain. It means a different way of living, working and travelling."

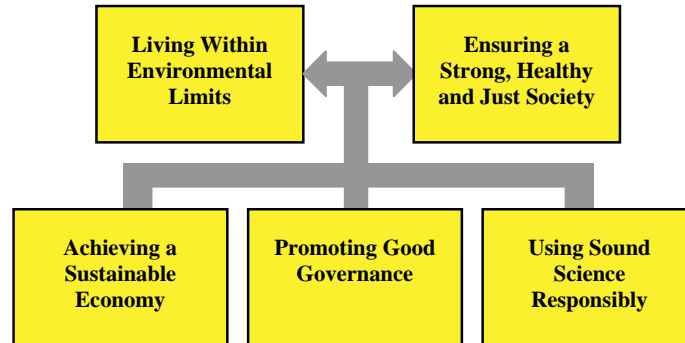
"The clearest evidence that we are living beyond environmental means is the threat of dangerous climate change. The scale of this threat, to human life and to the natural resources and assets on which it depends, for everything from oxygen and clean water to healthy soils and flood defence, means that this simply must be our top priority."

David Miliband, Secretary of State for the Environment, Food and Rural Affairs in letter to Prime Minister Tony Blair, July 2006 (Appendix 1)

2.2.2 The factual baseline data for One Planet Living can be found in Appendix 2 (DEFRA Minister's evidence to the Audit Commission's annual lecture, July 2006).

2.2.3 This 'One Planet Living' concept is further laid out through the 5 principles and 4 agreed priorities for sustainable development set out in the UK Sustainable Development Strategy "Securing the Future: delivering UK sustainable development strategy" (defra 2005):

The 5 Principles are:



The 4 agreed Priorities are:

- **sustainable consumption and production**
- **climate change and energy**
- **natural resource protection and environmental enhancement**
- **sustainable communities**

2.3 The South West Sustainable Development Framework

2.3.1 The UK Sustainable Development Strategy appears regionally as Regional Sustainable Development Frameworks.

2.3.2 The current SW Sustainable Development Framework (SWSDF) 2001 Sustainability Vision is (<http://www.sustainabilitysouthwest.org.uk/rsdf.html>) :

"The South West must remain a region with a beautiful and diverse environment. By working together and applying the principles of sustainability we can achieve lasting economic prosperity and social justice, whilst protecting that environment. This approach will secure a higher quality of life now and for the future."

2.3.3 The revised vision, due to be published in Autumn 2006, is emerging as *"People in the South West of England choose to live, work and prosper within environmental limits, pursuing justice and well-being and valuing diversity & distinctiveness."*

2.3.4 *"This Framework helps everyone in the South West region to understand and judge whether their actions are truly sustainable."*

Jonathon Porritt, Chair of the National Sustainable Development Commission and President of Sustainability South West.

SW evidence relating to the 4 national Priorities

2.3.5 There are a number of reports providing data which support the need to focus on the 4 National Priorities across the South-West. www.oursouthwest.com provides links to these, and other, reports:

- 1) the SW Eco-Footprint Analysis (www.stepsforward.org.uk Centre for Sustainable Energy, 2005) details that 5.3 planets would be required if everyone lived the same way as people in West Somerset and North Devon;
- 2) the status of and strategic issues relating to energy supply and consumption across the SW is detailed in Appendix 3 "Energy - the SW in Context.pdf"
- 3) the [South West Region Climate Change Impacts Scoping Study - Warming to the Idea](http://www.oursouthwest.com/climate/scopingstudy.htm) (2003) (<http://www.oursouthwest.com/climate/scopingstudy.htm>), details the impacts of climate change on the region. "People will need to learn how to live with unavoidable changes in the weather (adaptation) as well as ensure future developments reduce or eliminate anthropogenic climate change (mitigation)."

This study finds that the impact of climate change will have a significant impact on the natural environment. Habitats will change and many species will not be able to adapt quickly enough. Native species of flora and fauna could be under real threat. Water resources will also be under increased pressure as demands increase and summers become drier.

Heritage landscapes, including much of the coast and the region's archaeological remains, are also vulnerable to increased storm events, changes in soil moisture and flooding.

Similarly, longer, more reliable summers and warmer winters are likely to extend the tourist season and encourage more UK tourists to holiday at home. This will have a positive impact on the economy but could result in unsustainable pressure on the local environment. Rising sea levels and flooding could threaten the existence of some beaches, coastal and riverside amenities.

The region's heritage, including gardens and historic buildings, could be threatened by both increased visitor pressure and the direct impacts of climate change. More frequent storms, subsidence, light-degradation, rain, fungal and beetle attack and even the failure of historic planting schemes, would diminish attractiveness. Archaeology in uplands could also deteriorate due to drying out in summer, whilst coastal remains could be lost with rising sea levels.

4) Priorities for natural resource protection and environmental enhancement are set out in *Our Environment: Our Future. The Regional Strategy for the South West Environment 2004 – 2014*. (www.southwest-ra.gov.uk) and locally through the Exmoor Biodiversity Action Plan (www.swbiodiversity.org.uk/Regional/LBAPs/Exmoor/exmoor.htm)

5) Sustainable Communities are places where people want to live and work, now and in the future. They meet the diverse needs of existing and future residents, are sensitive to their environment, and contribute to a high quality of life. They are safe and inclusive, well planned, built and run, and offer equality of opportunity and good services for all.

'Creating Sustainable Communities in the South West' (Jan 2005 – see <http://www.gos.gov.uk/gosw/peoplesc/scomms/?a=42496>) - recognises that the South West is a diverse region with a growing population, great economic potential, plus prized environmental and cultural assets.

This regional strategic plan focuses upon:

- achieving a better balance between housing availability and the demand for housing - including improving affordability
- ensuring people have decent places to live - including cleaner, safer and greener localities
- tackling disadvantage, including homelessness
- delivering better services through strong effective local government
- promoting the development of the region.

To make sure that people are treated fairly and can participate fully the Integrated Regional Strategy has identified 'crunch objectives', which require integrated approaches:

- to ensure that in tackling intolerance and discrimination, the particular needs of individual people and communities are not overlooked in favour of a 'group' solution
- to work alongside one another to ensure that co-ordinated, consistent education and communication are given about tackling discrimination and exclusion in the region
- to ensure that everyone is able to access jobs, services, cultural facilities and activities and quality environments to enable them to participate in society
- to ensure an active, inclusive and creative approach to consultation on policy and delivery in the region.

2.3.6 SW Operating Principles

The emerging 2006 updated SW Sustainable Development Framework states that "to deliver the national Principles [through the 4 Priorities, whilst meeting the aspirations of SW regional strategic plans] and in order to achieve our sustainability mission we will need to apply all of the following practical regional **operating principles** to all activities.

In the South West we will:-

✓ **Be resource wise**

Adopt high energy, water and resource efficiency at home and at work, maximise the use of local, renewable energy; minimise waste and prevent pollution

✓ **Improve equality in meeting basic needs**

Support universal access to decent, affordable and adaptable housing, essential goods & services and safe and satisfying employment, learning, and leisure opportunities

✓ **Enhance regional and local distinctiveness and diversity**

Protect and enhance our natural and cultural resources and heritage and celebrate diversity and distinctiveness

✓ **Promote health and well-being**

Support physical and mental well-being through healthy, balanced lifestyles and the provision of a clean, safe and green environment

✓ **Use local and ethical goods & services**

Use locally/regionally sourced goods and services to boost our economy, supported by ethical sourcing to support people in other parts of the world

✓ **Reduce high carbon travel**

Support low carbon access through planning and innovation (eg demand-responsive public transport, home-working, mobile services, video-conferencing, online facilities, local multi-service centres and alternative fuels)

✓ **Help everyone to join in public decision-making**

Support wider, more informed participation in public and community decision-making to foster citizenship and involve people in the solutions to local and global challenges

✓ **Develop sustainability learning and skills**

Explain and promote the 'what', 'why' and 'how' of sustainability and develop 'systemic thinking' and professional skills to support sustainable solutions

✓ **Support thriving low carbon economies**

Boost the economy whilst reducing carbon emissions by promoting low carbon approaches, technologies and employment opportunities (eg sustainable construction and renovation, environmental management, local/regional supply chains and environmental technology)

✓ **Take a long term approach**

Ensure the social, economic and environmental sustainability and success of whatever you do by thinking ahead to the next 5 to 50 years and beyond!

2.4 The South West Integrated Regional Strategy – “Just Connect”

2.4.1 To quote from the “Just Connect document” (www.southwest-ra.gov.uk/nqcontent.cfm?a_id=548):

“Just Connect does not replace existing topic based strategies for the South West. Instead, it sets out the region’s key aims, and identifies those objectives where integration across our regional strategies is critical to the future of the region, many of which are already contained within regional strategies. Every strategy that is prepared and reviewed in the region must now be set within the context of Just Connect and demonstrate how it is actively taking forward the region's objectives. Just Connect also provides the basis for engaging in cross-sector dialogue in the review of priorities, strategies and delivery.

Just Connect is mutually supportive of the Region’s Sustainable Development Framework (RSDf), which is an extremely important document for the region. The aims and objectives of Just Connect are set within the context of the long-term vision for the South West expressed in the RSDf and seeks to deliver it.”

2.4.2 The 5 regional aims are:

1. *To enhance our economic prosperity and quality of employment opportunity*
2. *To enhance our distinctive environments and the quality and diversity of our cultural life*
3. *To harness the benefits of population growth and manage the implications of population change*
4. *To make sure that people are treated fairly and can participate fully in society*
5. *To address deprivation and disadvantage to reduce significant intraregional inequalities*

2.4.3 The Sustainability Appraisal of Just Connect stated:

“the sustainability challenges and opportunities for the South West are very real and not just a distant concern. The appraisal has shown that aims two, four and five of the Integrated Regional Strategy should contribute to the delivery of the Region’s Sustainable Development Strategy and that importantly, the approach taken to the delivery of these aims will determine to what degree their contribution can be maximised. Aims one and three will only significantly contribute to the delivery of the Region’s Sustainable Development agenda if they are approached in a way that supports the other three aims. Certain kinds of population growth and economic growth, i.e. if they deplete our environmental assets, increase social exclusion and climate change, are clearly incompatible with sustainable development. With these two aims, the approach taken will determine whether they are contributing to sustainable development.”

To measure progress of the Integrated Regional Strategy, indicators have been developed (Appendix 4).

3.0 The legal reasons for this document

3.1 *"The purpose of Sustainability Appraisal (SA) is to promote sustainable development through better integration of sustainability considerations into the preparation and adoption of plans..."*

SA is an iterative process that identifies and reports on the likely significant effects of the plan and the extent to which implementation of the plan will achieve the social, environmental and economic objectives by which sustainable development can be defined...

SA should:

- *Take a long view of whether and how the area covered by the plan is expected to develop, taking account of the social, environmental and economic effects of the proposed plan;*
- *Provide a mechanism for ensuring that sustainability objectives are translated into sustainable planning policies;*
- *Reflect global, national, regional and local concerns;*
- *Provide an audit trail of how the plan has been revised to take into account the findings of the SA;*
- *Form an integral part of all stages of plan preparation; and*
- *Incorporate the requirements of the SEA [Strategic Environmental Assessment] directive.*

3.2 The Directive's main areas of emphasis are on:

- Collecting and presenting baseline environmental information.
- Predicting the significant environmental effects of a plan and addressing them during its preparation with an assessment of strategic alternatives.
- Consulting the public and authorities with environmental responsibilities as part of the process.
- Providing a statement about how the results of SEA have been taken into account.
- Monitoring the actual environmental effects of the plan during its implementation.

Sustainability Appraisal and Strategic Environmental Assessment

3.3 European Directive 2001/42/EC requires a Strategic Environmental Assessment (SEA) of a wide range of plans and programmes. The objective of the 'SEA Directive' is *'To provide for a high level of protection to the environment and to contribute to the integration of environmental considerations into the preparation and adoption of the plans...with a view to promoting sustainable development'*.

3.4 The Sustainability Appraisal (SA) is intended to provide conformity with the SEA Directive. However, while an SEA is concerned with environmental effects, the Sustainability Appraisal is an iterative process that considers the broader environmental, social, economic and resource consequences of a plan and its policies, and seeks to identify ways of achieving a proper balance between these considerations.

¹ Taken from 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks – Consultation Paper' (Office of the Deputy Prime Minister, 2004)