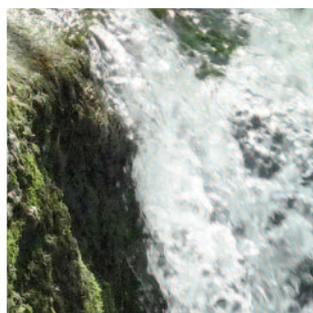
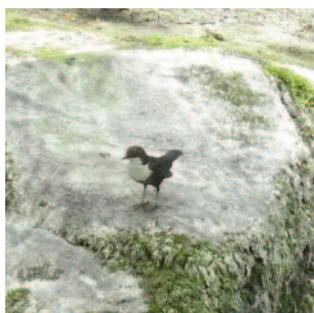
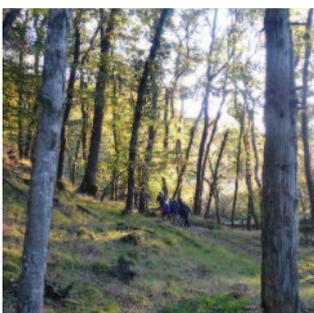
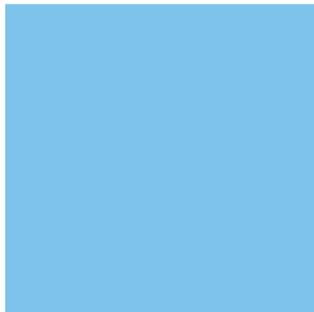


**EXMOOR**  
NATIONAL PARK

# Local Development Framework Core Strategy (Local Plan) Vision & Objectives, General Policies and Strategic Options Consultation Sustainability Appraisal Non-Technical Summary

November 2011



**Sustainability Appraisal  
Exmoor National Park  
LDF Core Strategy**

**Vision and Objectives,  
General Policies  
and Options**

**Non Technical Summary**

**For Exmoor National Park Authority**

**Clare Reid Consultancy  
October 2011**

## Table of Contents

	Page
1. Introduction	3
- What is a Sustainability Appraisal?	
- How was the Sustainability Appraisal carried out?	
- Table 1: SA Scoring System	4
2. What are the sustainability effects of the draft Policies?	4
- Table 2: SA scores for General Policies 1-3	5
- Table 3: Changes to Draft Policies 1-3 in the light of the SA	6
3. What are the sustainability effects of the draft Options for <i>where</i> new development should go?	8
- Table 4: SA scores for Settlement Hierarchy Options A-C	9
4. What are the sustainability effects of the draft Options for <i>how</i> affordable housing could be delivered?	14
- Table 5: Definitions for Housing Options	
- Table 6 – SA scores for Housing Delivery Options 1-4	15
5. Can I comment?	23
6. Appendix 1 - Sustainability Objectives, Criteria and Indicators	24

## Non-technical Summary Sustainability Appraisal of the draft LDF Core Strategy, General Policies and Options

### 1. Introduction

#### 1.1. What is a Sustainability Appraisal?

- 1.1.1. Exmoor National Park Authority is preparing its Local Development Framework (LDF) which will guide development in the National Park over the next 20 years. The National Park Authority is required to test the emerging LDF against a set of sustainability objectives, to consider the implications of the proposed policies and strategy against social, economic and environmental criteria. The aim is to ensure that the LDF has as many positive effects as possible, and that any potential negative effects are identified so that changes can be made to the draft LDF to avoid these effects.

#### 1.2. How was the Sustainability Appraisal carried out?

- 1.2.1. This Sustainability Appraisal has been undertaken by an external consultant in consultation with ENPA staff, considering whether each draft policy and option would have positive or negative effects in relation to the sustainability objectives and criteria. This includes considering impacts on:
- Air & water quality
  - Biodiversity & green infrastructure
  - Climate change adaptation & flood risk
  - Climate change mitigation & energy
  - Community & wellbeing
  - Economy & employment
  - Historic environment
  - Housing
  - Land
  - Landscape
  - Coast
  - Transport
- The full set of sustainability objectives and criteria is given in **Appendix 1**.
- 1.2.2. Each policy and option was assessed, and given an overall score. The scoring system is set out in **Table 1** below.

**Table 1 – SA scoring system**

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

## 2. What are the sustainability effects of the draft policies?

- 2.1.1. The draft LDF will include a set of General Policies, which will be applied to all development requiring planning permission within the National Park (although there will also be more detailed policies as well). The aim of the General Policies is to ensure that any new development will help to achieve the National Park purposes and deliver sustainable development.
- 2.1.2. Three General Policies were assessed at this stage:
- General Policy 1 - Achieving National Park Purposes and Sustainable Development
  - General Policy 2 – Sustainable Development Principles
  - General Policy 3 – Major Development
- 2.1.3. The assessment of General Policy 1 (GP 1) also included consideration of the draft Vision and Objectives for the LDF as these form part of the draft Policy. General Policies 1 and 2 were subsequently merged into one policy following discussion with the LDF Advisory Group, for the purposes of the public consultation. However, the separate assessments are included here and in the main Sustainability Appraisal Report to demonstrate how they scored against the sustainability objectives, and to report what changes were made as a result of the SA (see Table 3 below.) Other General Policies are still to be drafted and will be assessed at a later stage.
- 2.1.4. A summary of the SA scores for General Policies 1-3 is given in **Table 2** below.

**Table 2 – SA scores for General Policies 1-3**

SA topics	General Policy 1	General Policy 2	General Policy 3
Air quality and water resources	+	++	+
Biodiversity and 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	+	++	+

- 2.1.5. Detailed tables with the full assessment of General Policies 1-3 with explanations is given in the main SA report.
- 2.1.6. General Policies 1 and 2 (GP 1 & GP 2) scored positively for all the SA topics, as would be expected given their purpose to Achieve National Park Purposes and Sustainable Development.
- 2.1.7. 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 more than 10 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.

- 2.1.8. 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. **Table 3** below summarises the recommendations and how these were taken on board in the revised policies.

**Table 3 – Changes to Draft Policies 1-3 in the light of the Sustainability Appraisal**

<b>Policy GP1 – recommendations</b>	<b>Changes</b>
<b>Recommendation 1:</b> Policy GP1 is amended to insert reference to the ' <i>natural beauty, wildlife and cultural heritage of the National Park</i> ', mirroring the wording of the National Park's first purpose	Accepted
<b>Recommendation 2:</b> 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.
<b>Recommendation 3:</b> The draft Objectives could be strengthened by reference to health and wellbeing	The health and wellbeing of communities was considered to be part of Objective 11, meeting communities' needs and aspirations.
<b>Recommendation 4:</b> The Vision could be strengthened by specific reference to affordable housing and transport	The Vision includes 'access to services, housing, communications and infrastructure'. Specific references to affordable housing are made in the longer Vision statement, and the Objectives. Sustainable transport is one of the objectives.
<b>Recommendation 5:</b> The wording of the policy is strengthened to positively support achievement of the Vision and Objectives, rather than avoid adverse impacts on them	Accepted
<b>Recommendation 6:</b> 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	This is implicit in Objective 6, ' <i>to use local materials, sustainable building design and methods</i> '

<b>Policy GP2 – recommendations</b>	<b>Changes</b>
<b>Recommendation 7</b> – add ‘ <i>and helps create and connect habitats and networks of green infrastructure</i> ’ to Principle 8.	Accepted. Networks of green infrastructure now form part of Principle 7.
<b>Recommendation 8:</b> amend Principle 2 to read ‘ <i>supports the function, sustainability and resilience of individual settlements and their communities</i> ’.	Principle 2 has been substantially revised to provide more details of what functions settlements are expected to provide
<b>Recommendation 9:</b> make reference to health and community participation in Principle 11, and to services and safe, attractive public spaces in Principle 2.	Accepted.
<b>Recommendation 10:</b> add reference to ‘local’ services, facilities and jobs to Principle 3.	Accepted.
<b>Recommendation 11:</b> 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.
<b>Recommendation 12:</b> include reference to local, traditional sustainable building materials in Principle 7.	Accepted.
<b>Recommendation 13:</b> make specific reference to affordable housing in the Principles.	Not accepted. Affordable housing is included in the Objectives and Vision.
<b>Recommendation 14:</b> include reference to avoiding or reducing pollution, perhaps in Principle 9.	Accepted.
<b>Policy GP3 – recommendations</b>	<b>Changes</b>
<b>Recommendation 15:</b> Policy GP3 could be strengthened by test (vi) including the avoidance of harm, before mitigation and compensation are sought.	No changes made.
<b>Recommendation 16:</b> GP3 could be strengthened in relation to the <b>Community wellbeing, Economy and employment</b> and <b>Housing</b> topics by reference to the duty on National Park Authorities to foster the social and economic well-being of their communities.	Accepted.
<b>Recommendation 17:</b> GP3 could be strengthened in relation to the <b>Housing</b> topic by addition of reference in test (vi) to <b>Where a proposal for major development can demonstrate a significant net benefit to the National Park and its local communities.</b>	Accepted.

### 3. What are the sustainability effects of the draft Options for where new development should go?

3.1.1. The LDF will guide where new development is allowed in the National Park, including housing. A series of options for how this could be achieved has been developed, firstly considering *where* new development should be allowed within the National Park, and secondly *how* it should be delivered, specifically in relation to affordable housing. Both sets of options were tested against the Sustainability Appraisal Objectives and were given overall scores.

#### Options for where new development should go

3.1.2. The three spatial Options for where new development should be allowed are:

- **Option A** – which continues the current Local Plan approach of focusing new development in a number of towns and villages listed within the Local Plan. *These currently include Dulverton, Lynton and Lynmouth, Porlock, Allerford, Barbrook, Bridgetown, Brendon, Challacombe, Cutcombe, Dunster, Exford, Exton, Luccombe, Luxborough, Monksilver, Parracombe, Roadwater, Simonsbath, Timberscombe, Winsford, Withypool, Wheddon Cross and Wootton Courtney.*
- **Option B** – which proposes that new development is concentrated in a smaller number of settlements where there is a school, a regular bus service which runs 5+ times a week and a shop, namely *Cutcombe/Wheddon Cross, Dulverton, Dunster, Exford, Lynton and Lynmouth, Parracombe, Porlock and Timberscombe.*
- **Option C** – which includes the settlements currently listed in the Local Plan, it also proposes that this could be expanded to include additional settlements. Potential additional settlements with a shop and/or pub and/or village hall are identified, namely *Hawkridge, Twitchen, Heasley Mill, Kentisbury/Kentisbury Town, Trentishoe, Martinhoe, Countisbury, Rockford, Oare, Porlock Weir, West Porlock, Bossington, Selworthy, Withycombe, Nettlecombe, Elworthy.* (This list of settlements was subsequently revised to remove settlements that on further investigation were found to not meet the criteria. The settlements that were removed are *Kentisbury/Kentisbury Town, Trentishoe, Bossington, Nettlecombe, and Elworthy*)

3.1.3. Given the National Park status, locations for new development are limited, and must not be to the detriment of the statutory purposes for which the National Park is designated. All of the options are based on the premise that new development would only be allowed where there are suitable or potential sites in terms of the capacity of the settlement to accommodate new development without significant impacts on the landscape, and where the proposed development is in scale with the current settlement.

3.1.4. A summary of the scores for the Settlement Hierarchy Options A-C (*where new development will be allowed*) is given in **Table 4** below (please refer to the key for the scoring system at Table 1, page 4).

**Table 4 – Summary scores for Settlement Hierarchy Options A-C**

SA topics	Option A – all settlements listed in existing Local Plan.	Option B – development only in those towns and villages with a school, a regular bus service which runs 5+ times a week and a shop	Option C – all settlements listed in existing Local Plan AND settlements with a shop and/or pub and/or village hall
Air quality and water resources	+	-	+/-
Biodiversity and Green Infrastructure	+	+/-	+/-
Climate change & adaptation to flood risk	-	-	+/-
Climate change mitigation & energy	+	+	-
Community wellbeing	+/-	+/-	++
Economy and employment	+/-	+/-	++
Historic environment	-	+/-	+/-
Housing	+/-	-	++
Land	+	-	+
Landscape	+	+/-	-
Coast	-	-	+/-
Transport	+/-	+/-	-

3.1.5. Detailed tables with the full assessment of Settlement Hierarchy Options A-C with explanations is given in the main SA report.

3.1.6. Options A-C were informed by an analysis of the towns and villages within the National Park including an overview of the services and facilities available in the settlements. A Landscape Capacity study was carried out for the current listed settlements, and if any additional settlements from Option B are supported by the consultation and go forward into the LDF, additional landscape capacity assessments would need to be undertaken of these settlements.

**Option A – allow new development only in the settlements listed in the existing Local Plan**

+	Positive (with some opportunity for improvement)
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3.1.7. Option A scores positively for five of the SA topics of **Air quality and water resources, Biodiversity & Green Infrastructure, Climate change mitigation & energy, Land, and Landscape** as there is likely to be limited overall levels of new development reducing demands on natural resources such as water, energy and land. Focusing new development on the current list of settlements will also protect biodiversity and landscape character in the rest of the National Park. Landscape capacity studies have shown that there are suitable and potential sites within the listed settlements to accommodate small scale development. There may also be opportunities for enhancement of biodiversity or landscape character.

-	Negative
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3.1.8. However, as the settlements are important for cultural heritage and local distinctiveness, this option could impact negatively the **Historic environment**. There could also be negative impacts in relation to **Climate change & adaptation to flood risk**, and the **Coast**, as the list includes settlements that are vulnerable to sea level rise and flood risk, although all development would be subject to safeguards in policies, and levels of development will be dependent on the capacity of the settlement and available suitable land.

+/-	Some positive elements but also potentially some negative impacts
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3.1.9. For the remaining SA topics of **Community wellbeing, Economy and employment, Housing and Transport** there are a mix of positive and negative impacts. Development in settlements listed could meet the requirements of those communities including increased housing provision and jobs, support for local services, and so on. However, restricting new development only to those settlements listed may mean that the needs of other communities in the National Park may not be met.

**Option B – allow new development only in a smaller number of towns and villages**

+	Positive (with some opportunity for improvement)
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3.1.10. Option B scores positively for **Climate change mitigation & energy**, as focusing new build development in the smaller number of listed settlements where jobs and services are located will reduce the need to travel and therefore reduce greenhouse gas emissions.

-	Negative
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- 3.1.11. Option B scores negatively for **Air quality and water resources** as there is some evidence that air quality in larger settlements may be being affected by increase in particulates from burning oil and wood fuel (the main sources of heat due to lack of mains gas within Exmoor). This could be exacerbated by concentrating all new build within the listed settlements.
- 3.1.12. Option B also scores negatively for **Climate change & adaptation to flood risk, and the Coast** as the list includes settlements (Lynmouth) that are vulnerable to sea level rise and flood risk, and although all development would be subject to safeguards in policies, these risks are likely to be exacerbated due to concentration of development, limited capacity of the settlement and available suitable land.
- 3.1.13. Option B scores negatively for the SA topics of **Land** and **Housing** as it would limit the availability of land available for new development. Housing needs through new build would not be addressed in other (smaller) settlements (though reuse of buildings for local needs affordable housing could be allowed for). New build development would only be allowed in other settlements aside from permitted development rights and in very specific circumstances such as for agriculture or forestry or for farm shops/diversification for example. As a consequence, overall levels of affordable housing need may not be provided for due to the lack of sufficient suitable and potential land within the smaller number of settlements listed (due to landscape capacity and other restrictions). However, the focus of policy would still be on meeting affordable housing need.

<b>+/-</b>	Some positive elements but also potentially some negative impacts
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- 3.1.14. Option B has a mix of positive and negative impacts on **Biodiversity & Green Infrastructure, Landscape, Landscape** and the **Historic environment** as focusing new build in a restricted number of settlements reduces the impact on these assets in the rest of the National Park. However proposals would have the potential to impact on the biodiversity, landscape character and historic environment of the listed settlements, although all development would be subject to safeguards in policies. For example, Dunster, Dulverton, Lynton and Lynmouth, Paracombe and Porlock are all Conservation Areas. Landscape capacity studies have shown that there may not be sufficient suitable and potential sites within the smaller number of listed settlements to provide for identified housing need.
- 3.1.15. There are also a mix of positive and negative impacts for Option B in relation to **Community wellbeing, Economy & employment**. New development in these settlements could support local businesses and services, provide jobs and strengthen the community. However, restricting new development to only a smaller number of listed settlements may mean that the housing or employment and development needs of other communities may not be met. Finally, there are a mix of positive and negative impacts for Option B in relation to **Transport** as focusing new build development in the listed settlements where jobs and services are located will reduce the need to travel and therefore reduce greenhouse gas emissions. However, focusing new build development in existing settlements could increase traffic and congestion within those settlements.

**Option C – allow new development in the settlements listed in existing Local Plan AND additional identified settlements**

<b>++</b>	strongly positive
<b>+</b>	Positive (with some opportunity for improvement)

3.1.16. Option C scores strongly positive for three of the SA topics of **Community wellbeing, Housing, and Economy & employment** as it would allow for development in a wider range of communities, which could meet the needs of those communities including housing, employment land, jobs, support for local services, and could strengthen the community in the chosen settlements. It also scores positively for **Land** as the identification of additional settlements for new development could potentially increase the overall level of land available.

<b>-</b>	Negative
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3.1.17. However, Option C scores negatively for **Landscape** as it would be likely to increase both the range of settlements and the amount of new build development allowed for within the National Park and although any development would be subject to safeguards in policies, proposals would have the potential to impact on landscape, open space and the character of the listed settlements and any additional settlements identified. Landscape capacity studies would need to be undertaken of any additional settlements included in the LDF. Option C also scores negatively **Climate change mitigation & energy** and **Transport**, as the inclusion of a wider range of settlements could increase the need to travel for jobs and services and therefore increase greenhouse gas emissions.

<b>+/-</b>	Some positive elements but also potentially some negative impacts
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3.1.18. Option C has a mix of positive and negative impacts on **Air quality and water resources**, as there is likely to be limited overall levels of new development, and the main impacts on air quality and demands on water resources in the National Park are external. However, there may be issues regarding water resources for some settlements that do not have mains water (any additional new build would have to rely on private supplies), and this could be more significant than Option A given the additional number of smaller settlements identified.

3.1.19. In relation to **Biodiversity & Green Infrastructure**, and the **Historic environment** focusing new build in the listed settlements provides potential opportunities to enhance green infrastructure networks within those settlements and out into the wider countryside. Allowing development within additional settlements could also enable conservation enhancements such as bringing listed or historic buildings back into use. However, Option C would be likely to increase both the range of settlements and the amount of new build development allowed for within the National Park and although any development would be subject to safeguards in policies, proposals would have the potential to impact on the biodiversity and green infrastructure or character of the

listed settlements and any other additional settlements identified. The additional settlements include Porlock Weir, Bossington and Selworthy, which are all Conservation Areas.

- 3.1.20. There are also a mix of positive and negative impacts on the SA topics of **Climate change & adaptation to flood risk** and **Coast**. Although all development would be subject to safeguards in policies, the current list includes settlements that are vulnerable to sea level rise and flood risk. Levels of development will be dependent on the capacity of the settlement and available suitable land. The additional settlements include Porlock Weir, Heasley Mill, Rockford, Bossington which are all vulnerable to flood risk. However, the inclusion of settlements such as Porlock Weir, where communities are at risk of flooding, could enable the relocation of existing development. This could be achieved by designating Coastal Change Management Areas.

#### 4. What are the sustainability effects of the draft Options for how affordable housing could be delivered?

- 4.1.1. Exmoor National Park Authority is required to develop, appraise and consult on a number of options for providing housing in the National Park. The current approach has been to ensure all new build housing is affordable to meet the needs of local communities, reflecting the high number of households in need of affordable housing in the National Park; the high demand for open market housing within the National Park driven largely by in-migration and people moving to Exmoor to retire; and the limited available land supply due to factors such as steep land, flood risk and landscape considerations.
- 4.1.2. The priority for housing is still on the delivery of affordable housing. However, lower levels of grant funding mean that it will be more difficult to deliver affordable housing in future, and other options need to be considered, including raising funding for affordable housing through allowing limited local market or open market housing
- 4.1.3. The options developed by the National Park Authority present four alternatives for supporting affordable housing to address the needs of local communities – Option 1 continues the present approach by only allowing for affordable housing to address the needs of local communities. Options 2, 3 and 4 also continue to require affordable housing to address the needs of local communities but consider alternative methods of raising finance for it where required including elements of local and open market housing.
- 4.1.4. Definitions for the different kinds of housing used in the options are given in Table 5.

##### Table 5 – Definitions for Housing Options

Affordable housing to address local needs = housing for people who can demonstrate that they are in housing need, have a local connection (through living or working in the National Park or needing to live close to their place of work), and unable to afford housing on the open market. These homes can be rented e.g through a Housing Association, or owner occupied e.g self build with a local tie for future purchasers.

Local Housing = housing only for local people through living or working in the National Park but who may not qualify as being in affordable need e.g. an elderly person who wishes to downsize, a couple/family in a flat who wish to move to a family home or someone who needs to work in the National Park. A local tie would be likely to reduce the value compared to an open market home. Some other National Parks allow for this kind of housing.

Open market housing = housing which has no occupancy restriction or legal tie that can be bought by anyone (i.e. the majority of existing housing within the National Park).

- 4.1.5. A summary of the scores for Housing Delivery Options 1-4 is given in **Table 6** below (please refer to the key for the scoring system at Table 1, page 4).

**Table 6 – Summary scores for Housing Delivery Options 1-4**

SA topics	Housing Option 1 – 100% affordable housing to meet local needs	Housing Option 2 – affordable housing to address local affordable need with some local market housing	Housing Option 3 – affordable housing to address local affordable need with some local market housing and open market housing	Housing Option 4 – affordable housing to address local affordable needs with some open market housing
Air quality and water resources	+	+	+	+
Biodiversity and Green Infrastructure	++	-	+/-	+/-
Climate change & adaptation to flood risk	+/-	-	+/-	+/-
Climate change mitigation & energy	+/-	+/-	+/-	+
Community wellbeing	+/-	++	+	+/-
Economy and employment	+/-	++	+	+/-
Historic environment	++	+/-	+/-	+/-
Housing	+/-	++	+	+/-
Land	+	--	-	+/-
Landscape	++	--	-	+/-
Coast	+/-	+/-	+/-	+/-
Transport	+/-	+/-	+/-	+/-

4.1.6. Detailed tables with the full assessment of Housing Delivery Options 1-4 with explanations are given in the main SA report

### Housing Option 1 – 100% affordable housing to meet local needs

4.1.7. Housing Option 1 in effect continues the current policy of requiring all new build housing to be affordable housing to meet local needs using housing grant and/or using any developer contributions.

<b>++</b>	strongly positive
<b>+</b>	Positive (with some opportunity for improvement)

4.1.8. Housing Option 1 scored strongly positive for **Biodiversity & Green Infrastructure**, **Historic Environment**, and **Landscape** as it ensures that the limited supply of suitable land is only used for the most needed (affordable) housing, thereby minimizing overall impacts on biodiversity, historic environment, and landscape character (as overall levels of house building will be limited). At the same time, there would be limited opportunity for enhancement from any development.

4.1.9. Housing Option 1 also scored positively for **Air quality and water resources** and **Land**. There is likely to be limited house building under this option so the impact on overall air quality or water resources is likely to be limited. This Option ensures that the limited supply of suitable land is only used for the most needed (affordable) housing, thereby minimizing overall demands for land. The requirement to build to affordable homes to higher levels of sustainable construction could support greater use of recycled materials, local building materials reduced waste and so on. However this Option may limit potential to re-use certain sites particularly contaminated land (and therefore potentially improve them by removing contamination) due to the impact on viability.

<b>+/-</b>	Some positive elements but also potentially some negative impacts
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4.1.10. There were both positive and negative impacts from this option for the remaining SA topics. In relation to the SA topics of **Climate change, adaptation to flood risk**, and the **Coast** Housing Option 1 ensures that the limited supply of suitable land is only used for the most needed (affordable) housing, thereby minimizing overall demands for land and consequently reduces the likelihood of having to build in areas at risk of flooding or vulnerable coastal areas. However, it also means that in situations such as Porlock Weir where communities are at risk of flooding, restricting new build to affordable needs only could prevent families from relocating. In relation to **Climate change mitigation and energy**, Housing Option 1 would encourage new build to be to higher standards of sustainable construction through the Code for Sustainable Homes (if grant funded). However, the requirement to build to Code Level 3 has increased the cost and could affect overall viability of the development (although some recent evidence from Government suggests that costs are declining).

4.1.11. In relation to the SA topics of **Community wellbeing** and **Housing**, Housing Option 1 is positive in focusing provision only on meeting the demonstrated need for affordable housing in communities. This approach applies to single new homes e.g. for self builds as well as a number of houses on a site. Requiring all new housing to be

for local affordable needs ensures that land values remain lower and more affordable so enabling housing associations and individuals to acquire land specifically for affordable housing. Restricting provision to local people may also help to maintain strength of community and support retention of services. However, in the foreseeable future, delivery of affordable housing is likely to be very limited or potentially halted if housing grant remains at current levels due to reductions in Government housing grant - although grant levels may change over the lifetime of the plan. This option could also restrict opportunities for other housing needs to be met, e.g for older people wishing to downsize or families requiring larger houses. It is also uncertain whether the specific needs of agricultural and forestry workers would still be met under this option.

4.1.12. In relation to **Economy & employment**, Housing Option 1 is positive in targeting provision at local people thereby helping to provide housing for people working locally who could not otherwise afford to live near to where they work. However there are also some negative implications of this option, as the limited number of new houses likely to be built will restrict local employment in construction. The limited supply of new housing could also affect businesses who struggle to recruit workers who are not in affordable housing need. In addition, affordable housing tends to be restricted in size and therefore may not be suitable for enabling home working/flexible working. In relation to **Transport**, under Housing Option 1 there are likely to be lower overall levels of new house building, which will create less traffic and emissions. However, the potential lack of available suitable housing for workers could lead to increased commuting, and the limited numbers of houses being built could restrict opportunities (due to limited finance) for transport enhancements such as opportunities for walking and cycling.

**Housing Option 2 - affordable housing to address local affordable need with some local market housing**

++	strongly positive
+	Positive (with some opportunity for improvement)

4.1.13. Housing Option 2 scored strongly positive for **Community wellbeing, Housing, and Economy & employment**. Whilst the focus is still on delivering affordable housing, this option also allows for new local need affordable homes and other new build non-affordable local housing such as older people wishing to downsize or families requiring larger houses. A local tie would be likely to reduce the value compared to an open market home, keeping the housing more affordable for local people. In addition, evidence indicates that local housing could help provide contributions to help deliver affordable homes for local communities. Targeting provision at local people will also help the local economy as it will provide housing for people working locally who could not otherwise afford to live near to where they work. This could help businesses who struggle to recruit workers who are not in affordable housing need. It may also enable some housing stock to be larger which would be more suitable for home working or flexible working. Although overall levels of new build housing are still likely to be small, Housing Option 2 would result in more houses than in Option 1, which could support more local employment in construction. Housing Option 2 also scored positively for **Air quality and water resources**. Although there may be more housing built under this

option than Option 1, this is still likely to be limited in terms of overall numbers, and consequently the impact on air quality or water resources is not considered likely to be significant.

- -	Strongly negative
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4.1.14. However, Housing Option 2 scored strongly negative for two SA topics, namely **Landscape** and **Land**. Allowing for new local (non affordable) housing to cross-subsidise affordable housing would require more housing in a development and therefore more housing in total and so use up more of the limited sites and land suitable for housing in the National Park resulting in greater potential impact on landscape character. As land values are likely to be lower, Housing Option 2 may not raise sufficient finance to enable contaminated land to be improved, although there may be some opportunity for redevelopment of existing inappropriate development which would improve settlement character.

-	Negative
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4.1.15. Housing Option 2 scored negatively for **Biodiversity & Green Infrastructure** and **Climate change & adaptation to flood risk**. Local market housing will generate less value from a site (than open market housing) and so contributions are likely to be prioritised on affordable housing provision with no or limited finance available for other enhancements such as biodiversity enhancement or the provision of Green Infrastructure. There is also likely to be more pressure on the limited supply of land, which could lead to increased likelihood of detrimental impact on biodiversity or having to build in areas at risk of flooding.

+/-	Some positive elements but also potentially some negative impacts
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4.1.16. For the SA topic of **Climate change mitigation & energy**, Housing Option 2 has both positive and negative impacts. The continued focus on provision of affordable housing would contribute to climate change mitigation and energy conservation as Registered Providers (e.g. Housing Associations) are currently required to build to higher standards of sustainable construction through the Code for Sustainable Homes (if grant funded). However, the requirement to build to Code Level 3 has increased construction costs (although some recent evidence from Government suggests that costs are declining), which under the lower finance likely to be raised under a local market option, could affect viability. For the SA topic of **Coast**, Housing Option 2 has positive impacts, in situations where communities are at risk of flooding, allowing some local market housing could provide opportunities for relocation. However there is likely to be more pressure on the limited supply of land, which could lead to increased likelihood of having to build in vulnerable coastal areas.

4.1.17. In relation to the **Historic Environment**, Housing Option 2 is positive as there is likely to be a low level of overall housing built under this option (although slightly more than Option 1), consequently there is likely to be limited impact on the historic environment – although this will depend on largely on location and level of overall

need. However, there are also likely to be limited opportunities for conservation enhancement as local market housing will generate less value from a site and so contributions are likely to be prioritised on affordable housing provision with no or limited finance available for other enhancements.

4.1.18. For the SA topic of **Transport**, this option may provide additional suitable housing for workers and reduce the need for commuting. However, it is likely to result in more housing overall and so will create more traffic and emissions.

**Housing Option 3 – affordable housing to address local affordable need with some local market housing and open market housing**

+	Positive (with some opportunity for improvement)
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4.1.19. Housing Option 3 did not score strongly positive for any of the SA topics. Housing Option 3 scored positively for **Air quality and water resources**. Although there may be more housing built under this option than Option 1, this is still likely to be limited in terms of overall numbers, and consequently the impact on air quality or water resources is not considered likely to be significant.

4.1.20. Housing Option 3 also scored positively for **Community wellbeing** and **Housing**. The overall focus is still on providing affordable housing, and evidence indicates that local and open market housing can provide contributions to help fund affordable homes for local communities. In addition, this option allows for new local need affordable homes and other new build non-affordable local housing such as older people wishing to downsize or families requiring larger houses. Open market housing could also provide additional contributions to deliver community infrastructure. However, open market housing would cater for demand but not necessarily need and would not have a local tie. It could also lead to additional second homes that do not necessarily maintain strength of community and support retention of services. Despite these negatives this option was considered on balance to score positively overall.

4.1.21. Similarly, in relation to **Economy & employment**, this option was considered to score positively overall, as targeting provision at local people will help the local economy as it will provide housing for people working locally who could not otherwise afford to live near to where they work. This could help businesses who struggle to recruit workers who are not in affordable housing need. It may also enable some housing stock to be larger which would be more suitable for home working or flexible working. Although overall levels of new build housing are still likely to be small, Housing Option 3 would result in more houses than in Option 1, which could support more local employment in construction. There may be some negatives as evidence suggests that open market housing could lead to increased in-migration by retired people who would not be economically active.

-	Negative
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4.1.22. Housing Option 3 scored negatively for the SA topics of **Landscape** and **Land**. Allowing for new local and open market housing to cross subsidise affordable housing

would require more housing in a development and therefore more housing in total and so use up more of the limited sites and land suitable for housing in the National Park with greater potential impact on landscape character. There are some potential positive outcomes from this option, as it may raise sufficient finance to enable enhancements such as improvement of contaminated land or landscape enhancements including the removal of existing inappropriate development, due to the increased value from open market housing. As with all the options, the requirement to build to affordable homes to higher levels of sustainable construction could support greater use of recycled materials, local building materials, reduced waste and so on.

<b>+/-</b>	Some positive elements but also potentially some negative impacts
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- 4.1.23. For the SA topic of **Biodiversity & Green Infrastructure**, Housing Option 3 has both positive and negative impacts. On the positive side, this option could provide more opportunities for biodiversity enhancement or Green Infrastructure due to the increased value from open market housing. However, there is likely to be more pressure on the limited supply of land, which could lead to increased likelihood of detrimental impact on biodiversity.
- 4.1.24. Housing Option 3 also has both positive and negative impacts on **Climate change & adaptation to flood risk**, as it could provide more opportunities for flood defences due to the increased value from open market housing. However, there is likely to be more pressure on the limited supply of land, which could lead to increased likelihood of having to build in areas at risk of flooding. Similarly, for the SA topic of **Coast**, Housing Option 3 has positive impacts for communities at risk of flooding, as allowing some local market housing could provide opportunities for relocation. However there is likely to be more pressure on the limited supply of land, which could lead to increased likelihood of having to build in vulnerable coastal areas.
- 4.1.25. For the SA topic of **Climate change mitigation & energy**, Housing Option 3 would be positive due to the continued focus on provision of affordable housing which would contribute to climate change mitigation and energy conservation as registered providers (Housing Associations) are currently required to build to higher standards of sustainable construction through the Code for Sustainable Homes (if grant funded). However, the requirement to build to Code Level 3 has increased construction costs (although some recent evidence from Government suggests that costs are declining), which could affect the viability of the site, particularly if local market housing is being sought, although open market housing is likely to generate higher value and viability would be less likely to be affected. On the negative side, there will be an overall higher level of housing and consequently greenhouse gas emissions could be higher, although this could be mitigated by building to higher standards of sustainable construction.
- 4.1.26. In relation to the **Historic Environment**, this option could provide more opportunities for historic environment enhancement due to the increased value from open market housing. However, there is likely to be more pressure on the limited supply of land, which could lead to increased likelihood of detrimental impact on the historic environment. For the SA topic of **Transport**, Housing Option 3 may provide additional suitable housing for workers and reduce the need for commuting. The flexibility to

include open market housing could generate additional finance which may enable transport enhancements such as opportunities for walking, cycling and so on. However, it is likely to result in more housing overall and so will create more traffic and emissions.

**Housing Option 4 – affordable housing to address local affordable needs with some open market housing**

+	Positive (with some opportunity for improvement)
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4.1.27. Housing Option 4 did not score strongly positive for any of the SA topics. It scored positively for **Air quality and water resources**. Although there may be more housing built under this option than Option 1, this is still likely to be limited in terms of overall numbers, and consequently the impact on air quality or water resources is not considered likely to be significant.

4.1.28. Housing Option 4 also scored positively for **Climate change mitigation & energy**. The continued focus on provision of affordable housing would contribute to climate change mitigation and energy conservation as registered providers (Housing Associations) are currently required to build to higher standards of sustainable construction through the Code for Sustainable Homes (if grant funded). The requirement to build to Code Level 3 has increased construction costs (although some recent evidence from Government suggests that costs are declining), but open market housing is likely to generate higher value and would be less likely to be affected. Whilst there will be an overall higher level of housing and consequently greenhouse gas emissions could be higher, this was considered to be mitigated by building to higher standards of sustainable construction.

+/-	Some positive elements but also potentially some negative impacts
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4.1.29. For the remaining SA topics there are both positive and negative impacts. Evidence indicates that open market housing can provide contributions to help fund affordable homes for local communities due to the higher values that can be raised from such development, and could potentially also provide contributions to additional benefits such as deliver community infrastructure which score positively for **Housing and Community wellbeing**. However, open market housing would cater for demand but not necessarily need and would not have a local tie. It could also lead to additional second homes that do not necessarily maintain strength of community and support retention of services.

4.1.30. The provision of additional open market housing could also be positive for the **Economy & employment** as it may help businesses who struggle to recruit workers who are not in affordable housing need. It may also enable some housing stock to be larger which would be more suitable for home working or flexible working. Although overall levels of new build housing are still likely to be small, Housing Option 4 would result in more houses than in Option 1, which could support more local employment in construction. However, there may also be some negative impacts as evidence

suggests that open market housing could lead to increased in-migration by retired people who would not be economically active.

- 4.1.31. For the SA topics of **Biodiversity & Green Infrastructure**, and **Historic Environment** this option could provide more opportunities for enhancement of biodiversity, Green Infrastructure networks, or historic environment due to the increased value from open market housing. However, there is also likely to be more pressure on the limited supply of land, which could lead to increased likelihood of detrimental impact on biodiversity or the historic environment. Similarly allowing for new open market housing to cross subsidise affordable housing would require more housing in a development and therefore more housing in total and so use up more of the limited sites or **Land** suitable for housing in the National Park with greater potential impact on **Landscape** character. However, this option could provide more opportunities for enhancements such as the improvement of contaminated land or the removal of previous inappropriate development, due to the increased value from open market housing. The requirement to build to affordable homes to higher levels of sustainable construction could also support greater use of recycled materials, local building materials, reduced waste and so on.
- 4.1.32. For the SA topics of **Climate change & adaptation to flood risk**, and **Coast Housing** Option 4 could provide more opportunities for flood defences due to the increased value from open market housing. However, there is likely to be more pressure on the limited supply of land, which could lead to increased likelihood of having to build in areas at risk of flooding. In relation to **Transport**, Housing Option 4 may provide additional suitable housing for workers and reduce the need for commuting. It could also generate additional finance which may enable transport enhancements such as opportunities for walking, cycling and so on. However, this option is likely to result in more housing overall and so will create more traffic and emissions.

## 5. Can I comment?

- 5.1. The Sustainability Appraisal report will be the subject of public consultation alongside the draft LDF Vision, Objectives, General Policies and Options. The full SA report, along with the other consultation documents are available on the Exmoor National Park website at [www.exmoor-nationalpark.gov.uk](http://www.exmoor-nationalpark.gov.uk) and from the National Park offices.
- 5.2. In accordance with the requirements the three statutory bodies will also be consulted:
- Environment Agency
  - English Heritage
  - Natural England

## Appendix 1 - Sustainability Objectives, Criteria and Indicators

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

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

Topic	Objectives
<b>Air Quality and Water Resources</b>	<p><b>1. To minimise air pollution (including green house gas emissions) and water pollution and ensure air and water quality is maintained or improved.</b></p> <p><i>Explanation: This objective seeks to minimise pollution from development.</i></p>
<b>Biodiversity and Green Infrastructure</b>	<p><b>2. To conserve and enhance biodiversity and to protect, conserve and enhance all habitats and species.</b></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>
<b>Climate Change and Adaptation to Flood Risk</b>	<p><b>3. To minimise and manage the risk of all forms of flooding.</b></p> <p><b>4. To minimise the impacts of climate change on Exmoor’s communities and habitats.</b></p> <p><i>Explanation: These objectives seeks to manage and minimise the impacts of climate change and flood risk and help communities and habitats to adapt as appropriate.</i></p>
<b>Climate Change Mitigation and Energy</b>	<p><b>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.</b></p> <p><i>Explanation: This objective seeks to minimise greenhouse gas emissions, promote sustainable living, implement sustainable building practices and install renewable technology that is appropriate to the National Park’s statutory purposes to conserve and enhance the natural beauty, wildlife and cultural heritage of the area and to promote opportunities for the understanding and enjoyment of its special qualities by the public, whilst aiming to achieve the target of becoming a carbon neutral National Park by 2025.</i></p>

Non-Technical Summary Sustainability Appraisal  
LDF Core Strategy Vision and Objectives, General Policies and Options

Topic	Objectives
<b>Community and Wellbeing (including equalities and health)</b>	<p><b>6. To promote and support thriving and inclusive communities, health and wellbeing.</b></p> <p><b>Explanation:</b> <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>
<b>Economy and Employment</b>	<p><b>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.</b></p> <p><b>Explanation:</b> <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>
<b>Historic Environment</b>	<p><b>8. To maintain and enhance the quality of the built environment.</b></p> <p><b>Explanation:</b> <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>
<b>Housing</b>	<p><b>9. To help ensure that National Park-communities have access to appropriate, good quality, sustainable, affordable housing.</b></p> <p><b>Explanation:</b> <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>
<b>Land (including agricultural, brownfield, contaminated land, waste and minerals)</b>	<p><b>10. To promote sustainable forms of development and sustainable use of natural resources.</b></p> <p><b>Explanation:</b> <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><b>11. To reduce all forms of waste production and promote reuse and recycling and minimise the risk of contaminated land.</b></p>

Non-Technical Summary Sustainability Appraisal  
LDF Core Strategy Vision and Objectives, General Policies and Options

Topic	Objectives
	<p><b>Explanation:</b> <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>
<b>Landscape</b>	<p><b>12. To protect, maintain and enhance the special qualities of the Exmoor National Park’s landscape character.</b></p> <p><b>Explanation</b> <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>
<b>Coast</b>	<p><b>13. To protect and/or enhance coastal areas.</b></p> <p><b>Explanation</b> <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>
<b>Transport</b>	<p><b>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.</b></p> <p><b>Explanation:</b> <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>