



# **EXMOOR NATIONAL PARK PARTENSHIP PLAN 2025-2030**

**SUSTAINABILITY APPRAISAL (SA)  
(integrating Strategic Environmental  
Assessment; Health Impact Assessment &  
Equality Impact Assessment)**

**NON-TECHNICAL SUMMARY**

**December 2024**

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# EXMOOR NATIONAL PARK MANAGEMENT PLAN 2025-2030

## SUSTAINABILITY APPRAISAL (SA) [Incorporating Strategic Environmental Assessment (SEA); Health Impact Assessment (HIA); Equality Impact Assessment (EqIA)]

### SA Report NON-TECHNICAL SUMMARY (NTS) December 2024

<i>date:</i>	December 2024 Draft & Final	
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## SA NON-TECHNICAL SUMMARY (NTS)

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### This is the NTS of the Sustainability Appraisal Report

1. This is the Non-Technical Summary of the Sustainability Appraisal Report documenting the processes of Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) within an integrated appraisal for the draft Exmoor National Park Partnership Plan. This summary is an integral part of the SA Report that accompanies the draft Partnership Plan for public consultation in early 2025. It provides an outline of the SA process and findings, including how the SA has influenced the development of the draft Plan, and in accordance with the requirements of the SEA Regulations, and UK guidance on SA/SEA.

### The Exmoor National Park Partnership Plan

2. The Exmoor National Park Authority is undertaking a review of the Exmoor National Park Partnership Plan (ENPPP). The review covers the period 2025-2030 with a long-term Vision and Objectives through to 2050.
3. Fundamental to the review of the Partnership Plan are the two statutory purposes of the National Park designation:
  - to conserve and enhance the natural beauty, wildlife and cultural heritage
  - to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public

Also, the duty of National Park Authorities in pursuing National Park purposes:

- to seek to foster the economic and social well-being of local communities (within the National Park) by working closely with the agencies and local authorities responsible for these matters
4. The Exmoor National Park Management Plan 2025-2030 includes a long-term Vision for Exmoor National Park in 2050 with strategic Aims, Objectives and Targets set out in seven themes. The draft ENPPP sets the context with an introduction, explains the purpose of the ENPPP, the purpose and duty of the National Park, and the Special Qualities for which the Exmoor National Park is designated. The ENPPP explains Government's priorities for National Parks and Partnership Plans, including the role of Protected Landscapes in helping to deliver targets on tackling climate change, recovering nature, and enhancing beauty, heritage and engaging with the natural environment.
  5. The strategic Aims are as follows:
    - A cared for landscape and heritage
    - A nature rich landscape
    - A net zero National park, mitigating and adapting to climate change
    - A welcoming place for all, that people feel connected to, improving their health and wellbeing
    - Healthy Natural Resources
    - A great place for people to live, work and do business
    - Bringing it all together – place based delivery

### **Sustainability Appraisal: SA, SEA, HIA, EqIA and HRA**

6. The purpose of Sustainability Appraisal is to promote sustainable development through the integration of environmental, social and economic considerations in the preparation of Plans. Certain plans, such as management plans, must also be subject to Regulations for Strategic Environmental Assessment (SEA) and Government advises that an integrated approach is taken so that the SA process incorporates the requirements for SEA – and to the same level of detail.
7. For the Sustainability Appraisal, an integrated process has been undertaken that also addresses health and equality issues (to demonstrate compliance with the Equality Act, 2010), alongside the requirements of the Habitats Assessments Regulations. The summary findings of the health, equality, and habitats assessments have been integrated into the Sustainability Appraisal. The Exmoor National Park Authority commissioned independent specialist consultants Enfusion to progress the appraisal work commencing autumn 2023.
9. SA is an iterative and ongoing process that informs plan-making by assessing developing elements of the plan, evaluating and describing the likely significant effects of implementing the plan, and suggesting possibilities for mitigating significant adverse effects and enhancing positive effects. UK

guidance suggests a staged approach to SEA. Initially the scope of the SA is determined by establishing the baseline conditions and context of the area by considering other relevant plans and objectives, and by identifying issues, problems and opportunities. From this the scope of the SA is prepared and includes a SA Framework of objectives for sustainable development relevant to the Exmoor National Park area and which forms the basis against which the draft plan is assessed.

### **Sustainability Characteristics of the Exmoor National Park area and likely evolution without the Partnership Plan**

10. The National Park is defined by the characteristics that contributed to its designation – special landscape/natural beauty, wildlife and the historic environment with a strong cultural heritage.
11. **Natural Beauty, Landscape & Seascape:** Exmoor's landscape character derives from the long history of livestock farming which has produced a patchwork of fields enclosed by traditional field boundaries (hedgerows and high Devon hedge banks) surrounding the higher moor land which is distinguished by larger enclosures and some common rough grazing. Landscape monitoring shows incremental but evident change in the nature of the land cover and vegetation and the occurrence of man-made features.
12. **Nature & Biodiversity:** Within Exmoor National Park there are 2 European designated sites Special Areas of Conservation (SACs) relating to 18% of the National Park: Exmoor Heath SAC and Exmoor & Quantock Oak Woodlands SAC. There are 15 SSSIs, 3 National Nature Reserves, 519 Local Wildlife Sites, and 29 Priority Habitats with over 200 Priority Species – in total, these designations cover 38% of the National Park. Only 15% of SSSIs are in favourable condition, with 81% in unfavourable recovering condition (compared with average of 61% across England). However, nature and biodiversity is wider than a focus on designated sites and nature recovery needs to consider wider networks and connectivity.
13. Climate change threatens the biodiversity of the National Park. Effects such as increased competition for limiting resources will harm wildlife populations, habitats will be lost due to extreme weather events and the seasonal changes occurring, and changes in the life cycles of agricultural pests will harm the agricultural industry. There has been significant vegetation change on the moors over the last 40 years with less heather, more gorse, bracken and purple moor grass. Peatlands are important carbon stores and essential to meeting targets for responding to climate change. They are important habitats and over 2,600ha of peatland is under restoration.
14. **Historic Environment & Cultural Heritage:** The archaeological landscape of Exmoor is extensive, as people have been using the landscape, and leaving their mark on Exmoor over the past 8,000 years. The various communities which have lived and farmed on Exmoor have not only shaped the physical

landscape but have imposed their cultural practises and traditions in the form of Exmoor's cultural heritage. Exmoor has a variety of designated historic environment assets. Exmoor's nationally designated heritage is generally well cared for and in good condition, although there has been an increase in Listed buildings at risk. Damage from livestock, vehicles and vegetation encroachment remain the key risks for scheduled monuments and Principal Archaeological Landscapes PALs. Many assets remain undesignated and lack protection. Climate and coastal change bring risks to heritage assets.

15. **Natural Resources - Land, Water & Air:** Exmoor's geology is comprised of sandstones, slates and shales with peat; no mining is carried out in the ENP area. Farming is dominated by hill and upland farms, most operating extensive grazing livestock production systems. Water resources, water quality and flooding are all inter-related and need to be considered together for sustainable water management and to meet with the objectives of UK Regulations. The National Park is within the Roadford Water Resource Zone (WRZ) with water services provided by South West Water and overall the water available for use is predicted to be above the overall demand. Only half of monitored rivers and designated coastal or transitional water bodies are achieving 'high' or 'good' status. There is increasing incidence of extreme weather events damaging the Rights of Way network, with more frequent flash flood events which cause path surfaces to wash out, and more trees to clear from paths following storms.
16. Air quality on Exmoor is generally good but nitrogen deposition continues to exceed site relevant critical loads and is an issue for maintaining the integrity of the designated SACs. Nitrogen deposition on Exmoor is not dominated by road traffic. The main sources of nitrogen deposition on the Exmoor SAC are livestock emissions through ammonia (NH<sub>3</sub>).
17. **Energy & Climate Change:** Emissions of greenhouse gases (GHGs) from residents are higher than the UK average due to a high level of retired people and consequent higher levels of spending on health; greater levels of flying and driving; and higher household fuel consumption for heating and electricity. Emissions from visitors while in the National Park are dominated by food (48%). Emissions from visitors travelling to/from the National Park is dominated by driving (62%) and reflects the relative remoteness of Exmoor. Industry emissions is dominated by agriculture, forestry and fishing (63%).
18. There is the potential to use different renewable energy sources within the National Park, such as wind power, solar power and hydro power; however, these can have negative effects on the special qualities of the National Park. The changes occurring as a result of climate change will have an impact on the agricultural industry and the ecology of the National Park. The moorland habitat of Exmoor is a key carbon store, and degradation of this habitat could have negative effects on climate change through the loss of a prominent carbon store. There are opportunities for mitigating climate change through land management changes and nature recovery, for example, peatland restoration, increasing soil carbon storage, and with more woodland planting.

19. **Economy and Employment:** Most businesses are micro (0-9 employees) and self-employment rates are significantly higher on Exmoor at 26.8% than in the UK (10.8%). GVA per capita is low compared to Devon and Somerset and other deeply rural areas in England. This is partly due to the low number of younger economically active people and the low productivity in key sectors such as tourism. Local businesses value the high quality environment of the National Park. There are high level of home based businesses and strong connections with local suppliers, which improves sustainability.
20. Farming is dominated by hill and upland farms and the number of farmworkers on Exmoor has remained relatively static over the last 10 years. There has been a fall in numbers of casual workers. The age structure among farmers appears healthy and there is a cohort of younger farmers with larger holdings and an innovative and market-focused outlook. Exmoor's economy is dominated by the tourism sector and is primarily made up of micro-businesses. New technologies are changing the way markets and sectors work, and digital connectivity is more important than ever. The 2021 visitor survey shows that the age profile of visitors continues to be skewed towards older visitors.
21. **Communities, Health & Equality:** Exmoor has a population of 10,284 people; the number of people living on Exmoor is declining and ageing. The majority of Exmoor is a sparse rural area – defined as 'rural hamlets or isolated dwellings in a sparse setting', or 'rural village in a sparse setting'. Only 3 settlements have populations of over 1,000 people (Dulverton, Porlock, Lynton & Lynmouth). These fulfil an important role as local service and tourism centres, serving a large catchment area.
22. Exmoor is one of the smallest National Parks in the UK, both in area and in population. It is remote from major centres of population, with no major road or rail access to the National Park. Exmoor house prices are substantially higher than regional and national averages, and wage levels are low, which means there is an affordability gap. There are few public transport links and the high cost of vehicle fuel impacts disproportionately on rural areas such as Exmoor.
23. The Index of Multiple Deprivation rankings for Exmoor's communities have fallen since 2015, reflecting a worsening in the relative deprivation of Exmoor's communities compared to other areas of the country. 28% of households have at least one person with a long-term health problem or disability. Within Exmoor there are many pockets of rural poverty. Many minority ethnic and other under-represented communities do not visit or engage with the National Park.
24. Without the Partnership Plan, competing requirements for nature, natural beauty, the historic environment, farming and forestry, communities and visitors would not be considered or managed proactively with likely negative effects. There would be no strategic framework for longer term planning and management to address the predicted effects of climate change, and opportunities would not be realised.



## Key Sustainability Issues, Problems and Opportunities

25. Key sustainability issues, problems and opportunities include the following:

Key Sustainability Issues	
	<ul style="list-style-type: none"> <li>▪ Need to deliver ambitious targets for addressing climate change</li> <li>▪ The special landscape needs to support all – residents, farmers, visitors, wildlife and natural resources</li> <li>▪ Potential conflicts between themes in the plan and need for balanced management, for example, nature recovery versus farming, archaeology and access; pressures to increase afforestation versus traditional farming with open, wild moorland; tranquillity, access and biodiversity; economy versus nature recovery</li> <li>▪ Extent of nature recovery and rewilding</li> <li>▪ Importance of rivers and peatlands with their roles in sustainable water management and climate change resilience</li> <li>▪ Vibrant economy needed to enable Exmoor to be a living place encouraging increase in visitors, particularly young and a wider diversity</li> </ul>

## How has the Partnership Plan been assessed?

26. The proposed scope of the Sustainability Appraisal was set out in the SA Scoping Report, including details of how the draft plan would be assessed. A SA Framework was compiled that is consistent with the SA Framework used to test the new Local Plan. This SA Framework of sustainability objectives, together with the baseline information, comprised the basis for assessment, and is summarised in the following table:

No.	SA Objective
1	To conserve and enhance the special qualities and natural beauty of the National Park's landscape character (including seascape); and manage change especially for climate change with the strategic landscape and in the longer-term
2	To preserve the wild, remote & tranquil characteristics of Exmoor, including minimising light and noise pollution
3	To protect and enhance sites of special geological interest and protect the landscape scale geology of Exmoor
4	To protect and enhance sites of special geological interest and protect the landscape scale geology of Exmoor
5	To recover and enhance natural and semi natural woodlands & moorland areas
6	To conserve, and enhance the historic environment (including designated & non-designated heritage assets) of sites, areas, buildings & landmarks of archaeological, historic, cultural and/or architectural interest and their settings
7	To support cultural heritage including local traditions, building & craft knowledge & skills and improve access and understanding of local heritage



8	To protect and improve air quality; promote water efficiency & improve water quality; reduce waste
9	To protect and conserve soil, land and minerals, reduce soil erosion and protect soil quality
10	To minimise Exmoor's contribution to climate change including through carbon storage & sequestration, energy efficiency, and maximise potential for renewable energy technologies
11	To reduce the risk of flooding from all sources and manage flood risk more sustainably
12	To promote and support a sustainable economy, particularly of key business sectors (tourism, agriculture, leisure/recreation, small businesses), and to utilise employment land & premises effectively and efficiently
13	To ensure that the needs of all National Park residents are met for affordable housing & access to good quality services & facilities
14	To promote sustainable transport, reduce traffic congestion & noise, and improve safety, health & air quality by reducing the need to travel, especially by car
15	To safeguard and improve community health, safety and wellbeing
16	To promote inclusiveness, equality and participation and take account of the needs of all sectors of the community in understanding and enjoying the special qualities of the National Park

27. The draft Partnership Plan, including the Vision, Aims & Objectives, was subject to SA. Using the SA Framework of objectives, the baseline information, and professional opinion, the likely effects of the emerging draft ENPPP were assessed. The SA considered positive/negative, short/long term, and cumulative effects where possible, and according to categories of significance as set out in the following table:

<b>Categories of Significance</b>		
	<b>Meaning</b>	<b>Sustainability Effect</b>
<b>++</b>	Major Positive	Plan element encouraged as would it resolve existing sustainability problem
<b>+</b>	Minor Positive	No sustainability constraints and plan element acceptable; Some opportunity for improvement
<b>+/-</b>	Positive & Negative	Some positive effects but also some potentially negative effects
<b>0</b>	Neutral	Neutral effect
<b>?</b>	Uncertain	Uncertain or Unknown Effects
<b>-</b>	Minor Negative	Potential sustainability issues: mitigation and/or negotiation possible
<b>--</b>	Major Negative	Problematical, improbable because of known sustainability issues; mitigation likely to be difficult and/or expensive

### **What reasonable alternatives have been considered and assessed?**

28. The ENPA is limited in the strategic options possible to investigate since it must comply with the requirements of its statutory designation as a National Park. The ENPA is required to prepare a Management Plan and therefore, the do-nothing scenario is not an option. Management of the National Park has required careful negotiation of potentially competing interests and needs – within the overall statutory requirements and duties. It was determined that there were no suitable or meaningful approach options for the Plan to consider and no meaningful or reasonable alternatives for the SA to consider.

### **What are the likely significant effects of the draft Partnership Plan? How has the SA influenced the draft Plan?**

29. Overall, the implementation of the Partnership Plan was found by the SA to have likely positive effects or neutral (insignificant or not directly applicable) effects; there were no negative effects identified. The SA found major positive effects for the key intentions to manage landscape, heritage and nature, including progressing naturally functioning systems. Major positive effects are indicated for mitigating and adapting to climate change - which will have further positive effects on all SA Objectives. Major positive effects are indicated for communities and health/wellbeing, particularly through the Aim for a welcoming place for all that considers visitors, workers, residents and their communities. Major positive effects were found through the SA for the support for the next generation of Exmoor.

### **How could negative effects be mitigated?**

30. Potential negative effects, particularly through possible conflicting objectives for the land have been mitigated through avoidance measures that have been embedded into the development of the Partnership Plan.

### **EqIA & HRA**

31. The equality impact screening assessment has found that the Management Plan is unlikely to have negative effects on protected characteristics or persons identified under the Equality Act 2010 and thus a full EqIA will not be required. Overall, effects were compatible and positive, or not applicable, with regard to protected persons; no negative effects were identified.
32. The HRA screening stage of the process determined that there would be no adverse likely significant effects (LSEs) on the identified European sites – either alone or in-combination with other plans and projects, and no further

assessment was required at this time. The HRA screening suggested where consideration of HRA may be needed in the future.

### **Were there any difficulties encountered?**

33. There were no significant technical difficulties encountered during the preparation of this SA. There are inherent difficulties in predicting the likely future baseline and assumptions were made using professional judgment.

## **Consultation and Engagement**

34. The development of the draft Partnership Plan has included wide engagement with key partners, including workshop and web-based documentation. The proposed scope of the SA was consulted formally at the scoping stage in October 2023 with the statutory bodies (Historic England, Environment Agency, and Natural England). Comments were received from Natural England and Historic England and some amendments were made to the SA Framework. Further consultation will be made in early 2025.

## **Monitoring Proposals**

35. Government advises that existing monitoring arrangements should be used where possible in order to avoid duplication. The Exmoor National Park Authority has advised that progress towards delivering the Targets in the Partnership Plan will be monitored through periodic updates to the State of the Park Report. It is considered that no further monitoring is necessary with regard to the SA/SEA.

## **Next Steps**

36. The draft Exmoor Management Plan 2025 to 2030 and this accompanying Sustainability Appraisal Report will be available for consultation during early 2025. Comments received on the SA and the draft Plan will be taken into account in finalising the Partnership Plan prior to adaptation later in 2025. This will be accompanied by a SA Adoption Statement in line with the requirements of the SEA Regulations.