



**DARTMOOR NATIONAL PARK AUTHORITY
LOCAL PLAN REVIEW 2020-2036**

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

NON-TECHNICAL SUMMARY

June 2019

enfusion



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

SA Report NON-TECHNICAL SUMMARY (NTS) June 2019

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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 Dartmoor Local Plan (DLP). This summary is an integral part of the SA Report that accompanies the Regulation 19 Pre-Submission draft DLP for public consultation during September to October 2019. 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 National Planning Policy Framework (NPPF), the European SEA Directive, and UK guidance on SA/SEA.

The Dartmoor Local Plan (DLP)

2. The Dartmoor National Park Authority is undertaking a review of the Dartmoor Local Plan. The previous Core Strategy was adopted in 2008, with the Development Management and Delivery DPD adopted in 2013. A Minerals Plan was also included within the previous Local Plan. The New Local Plan will replace these separate Plans with a single document, including waste and minerals policies.
3. Fundamental to the review of the Local 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 DLP has been prepared in accordance with national planning requirements and informed by various technical studies, the Sustainability Appraisal, and consultation with the public, stakeholders and the regulators. The DLP sets out the key challenges for the National Park area with the Vision for new development until 2018-2036. The Plan further comprises the Strategic Policies, including the Spatial Strategy appropriate to planning and caring for the National Park and meeting with its purpose and duty.
 5. The draft DLP is structured into 7 chapters with policies as follows:
 - 1 Vision, Spatial Strategy & Planning Applications [Policies 1.1-1.9]
 - 2 Environment [Policies 2.1-2.9]
 - 3 Housing [Policies 3.1-3.13]
 - 4 Communities, Services and Infrastructure [Policies 4.1-4.9]
 - 5 Economy [Policies 5.1-5.9]
 - 6 Minerals, Waste and Energy [Policies 6.1- 6.6]
 - 7 Towns, Villages and Development Sites [Policies 7.1-7.2 & Site Proposals 7.3-7.12, 7.14-7.19, 7.21- 7.23 with Site Policies 7.13, 7.20 & 7.24]

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 Local Plans. This requirement for SA is in accordance with planning legislation and paragraph 32 of the National Planning Policy Framework. Local 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 of the DLP, 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 Dartmoor National Park Authority commissioned independent specialist consultants Enfusion to progress the appraisal work commencing in April 2017.
8. 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 an SA Framework of objectives for sustainable development relevant to the Dartmoor National Park area and which forms the basis against which the draft DLP is assessed.

Sustainability Characteristics of the Dartmoor National Park area and likely evolution without the Local Plan

9. The National Park is defined by the characteristics that contributed to its designation – special landscape, wildlife and historical features. The extensive upland moorland supports internationally important blanket bogs; deep-cut valleys steeped in woodland with rivers are a notable landscape feature, together with distinct granite tors. A large amount of the land is used for grazing of cattle, sheep and ponies. Dartmoor is considered to have a high level of tranquility and dark night skies. The built environment is largely limited to small settlements and individual dwellings with settlement characters varying between those on the High Moor and those on the periphery.
10. Within the National Park there are three European designated Special Areas of Conservation (SACs) as well as others outside the boundary but within Devon. There is a further rich variety of biodiversity that ranges in designation from nationally to locally important; however, the significance of this may extend far more than the known resource and is important to the wider network of green infrastructure of Devon and the South West. Visitors, recreational use, and farming practices can all have detrimental effects on key habitats and wildlife.
11. Dartmoor has a very rich variety of designated heritage assets, and the archaeological landscape of Dartmoor is extensive. Dartmoor has more Scheduled Monuments than any other National Park in England. Many of the historical features are integral parts of the landscape and may have local significance to communities and individuals, together with contributing to the character of places.
12. The granite on Dartmoor has been quarried for centuries and mining has also been a feature of Dartmoor landscape. The soils on Dartmoor are peat on the higher moors, and thin soils in the surrounding area. Most of the land is designated as Grade 5, least fertile, and horticulture, arable farming and dairy farming are constrained to small areas. However, the soil resources of Dartmoor are still important, for non-intensive grazing and biodiversity.
13. Dartmoor is a major water catchment in the south west, supplying much of the water to Devon and Plymouth and with a surplus of water anticipated until 2040. Most waterbodies in the National Park are good-moderate ecological status; quality is mostly affected by pollution from agricultural run-off. Areas of medium to high flood risk (Zones 2-3) are largely located in steep sided valleys.

14. The population of Dartmoor is considered to be stable with little change since 2001. The National Park has a higher old age dependency ratio than the national average, creating issues for adaptable housing, pressures on local health services, and public transport. Each settlement on Dartmoor has its unique features and identity, and therefore each settlement has its own set of issues that are important to that specific community. Common issues across communities include access to local services/facilities, employment in settlements and rural areas, public transport and traffic. The fewer employment opportunities has resulted in people out-commuting for employment, a lack of opportunity for young people and weaker economies for local settlements.
15. The area is characterised by the housing vacancy rate, which is higher than both the Devon and England average, and is attributed to the number of second homes and holiday lets within Dartmoor. The ratio between average house prices and average earnings in the National Park is high. Young people, seasonal staff and part time workers, and other key workers are priced out of Dartmoor as they cannot afford accommodation. Enabling people to continue to farm whilst providing the highest status of protection to the landscape remains a key issue for the review of the Local Plan.
16. A number of key health statistics in Devon are below or in line with the national averages; Dartmoor also has a lower than average Index of Multiple Deprivation score. Overall, 48% of Dartmoor National Park is designated as Access Land for the public, and therefore all residents and visitors have access to this land to use for recreational purposes.
17. Employment has been growing at around 2.8% per annum and the local economy is remaining resilient and benefitting from a diverse economic base. Many of the jobs in Dartmoor are in agriculture, forestry and fishing. There is net out commuting for work from Dartmoor for about 23% of workers and a key factor is to increase opportunities for home working. In 2015, over 2.3 million tourists visited the National Park, of which 2.05 million were day visitors and 263,000 were staying visitors (a 17% increase on 2009 indicating a growing trend).
18. Dartmoor is bordered to the north by the A30, to the south by the A38 and to the west by the A386. The A30 and A38 to the east provide access to the M5 at Exeter. The main A roads such as the A386 suffer from congestion; and the mode of transport for local people is private vehicles such as cars and vans. The public rights of way network is extensive with footpaths, bridleways and byways located across the National Park.
19. Transport is the highest source of energy consumption due to the rural nature of the area. Overall the climate of Dartmoor is changing, becoming warmer and wetter with a longer growing season – affecting biodiversity and farming. Whilst almost 50% of waste within Dartmoor was sent to reuse, recycling or compost (higher than the national average), rubbish can be an issue as a result of increased visitor numbers.

20. Without the Dartmoor Local Plan to guide and manage new development, pressures on important landscape, heritage and biodiversity assets may cause adverse effects that are difficult to mitigate; housing and employment will not be located in the most sustainable locations with accessibility to transport and community services.

Key Sustainability Issues, Problems and Opportunities

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

Key Sustainability Issues

- New development has the potential for an unacceptable effect on the landscape or settlement character & their settings; high quality design is needed
- Farming practises and forestry activities should not result in landscape deterioration
- Light pollution from peripheral towns and cities, and development within the National Park, threatening the dark night skies, should be minimised
- Change of farmsteads to residential or holiday lets can harm the integration of farmsteads with the landscape
- Need to protect the internationally, nationally and locally designated biodiversity and geodiversity that covers much of the area
- Managing access so that designated sites, priority habitat and priority species are not negatively affected by recreational activities, whilst sustaining positive effects for the economy
- Encouraging sustainable farming and forestry practises
- Need to protect the range of extensive historical and archaeological features, both designated and undesignated
- Protecting historic farmsteads and farm buildings, and promoting the reuse of derelict or abandoned buildings without adverse effects on the character and cultural heritage
- New proposals for mining or quarrying operations should not negatively affect the special qualities
- Contributing to water quality improvement & more sustainable management of water; avoiding development in areas of flood risk
- An ageing population
- The decline of some rural settlements due to limited opportunities for appropriate full-time employment
- New development should be focussed in areas that are the most sustainable and have the capacity for change
- Net out-commuting for work, which may increase as peripheral towns and cities grow
- Relatively low wages and high house prices which may deter/prohibit young workers living in the National Park

- Almost half of businesses are small or micro, and there is a high level of self-employment
- Relatively high employment in agriculture, but this is forecast to fall
- 20-30% of employment is in tourism, with large-scale expenditure in the local economy by tourists, dominated by day visitors
- High dependence on private vehicle use with poor and infrequent public transport services – a common feature in rural Devon
- Risk of congesting road network in vicinity of new major developments on outskirts of National Park area
- Promote sustainable transport in the National Park
- Mitigating and adapting to the effects of Climate Change through appropriate design and siting of development
- Avoid inappropriate waste management facilities in the National Park

How has the DLP been assessed?

22. 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. An SA Framework was compiled, including SA Objectives that aim to resolve the issues identified for development planning in the DLP area. This SA Framework, 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 landscape and settlement character of Dartmoor National Park
2	To conserve & enhance the character, safety & sustainability, of the built environment by raising the quality of design and construction
3	To protect, enhance and manage biodiversity & geodiversity for net gain
4	To ensure the protection, conservation, and enhancement of the historic environment & its setting
5	To protect and conserve soil, land and minerals
6	To promote efficient water use and improve water quality
7	To reduce the risk of flooding from all sources and manage flood risk more sustainably
8	To maintain and enhance community and settlement identities distinctive to Dartmoor
9	To support the provision & accessibility of services & facilities
10	To ensure that the housing needs of all National Park residents are met
11	To improve the health and wellbeing of communities and reduce inequalities
12	To promote & support the economy , especially key business sectors of tourism, agriculture, leisure/recreation & small businesses
13	To help reduce congestion , particularly on outskirts of the National Park, and reduce associated indirect impacts on air quality and greenhouse gas emissions

14	To encourage a change to sustainable transport modes and to reduce the need to travel
15	To reduce waste & promote reuse & recycling

23. Each developing element of the draft DLP, including potential site options and policies to manage proposed development, was subject to SA. Using the SA Framework of Objectives and decision-aiding questions, the baseline information, and professional opinion, the likely effects of the emerging draft DLP 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:

Categories of Significance for SA		
Symbol	Meaning	Sustainability Effect
- -	Major Negative	Problematical & improbable because of known issues; mitigation likely to be difficult and/or expensive
-	Minor negative	Potential sustainability issues: mitigation and/or negotiation possible
+	Minor positive	No sustainability constraints and development acceptable
++	Major Positive	Development encouraged as would resolve existing sustainability problem
?	Uncertain	Uncertain or Unknown Effects
0	Neutral	Neutral effect

24. The SA made suggestions to the plan-making team for mitigating any significant negative effects identified, where possible, and any possibilities for enhancement, where relevant. Sustainability Appraisal is informed by the best available information and data. However, data gaps and uncertainties exist and it is not always possible to accurately predict effects at the plan level. For example, specific significance of effects on biodiversity, heritage assets, or changes to local level traffic flows may depend on more detailed studies and assessments that are more appropriately undertaken at the next stage of planning - at the site level. Climate change impacts are difficult to predict as the effects are most likely to be the result of changes at a cumulative and regional or national level, and therefore a precautionary approach that seeks to deliver best practice mitigation and adaptation is the most appropriate approach.

What reasonable alternatives have been considered and assessed?

25. The SA investigated four options for the Spatial Strategy, as follows:

Option 1: Current Two-Tier approach with 8 Local Centres; 34 Rural Settlements; everywhere else defined as Open Countryside – based on current services & facilities

Option 2: Two-Tier approach based more upon size, overall role, & capacity/sensitivity to growth, as well as an element of settlement services & facilities

Option 3: As Option 2 but splitting into Three Tiers – Local Centres, Rural Settlements, and Villages & Hamlets, plus the remaining Open Countryside

Option 4: A Spatial or Clustered approach recognising 10 clusters: East Dartmoor 1 & 2; South East Dartmoor; South West Dartmoor; Teign Valley; Bovey Valley; Upper Teign; North East Dartmoor; West Dartmoor; High Moor

26. Potential options for housing and employment land were investigated through plan-making and the SA tested those options that were considered to be reasonable alternatives – suitable and deliverable. The SA considered cumulative effects and the inter-relationships between sustainability topics and made comments with regard to any significant effects identified, where possible. The outline reasons for selection or rejection of site options and progression as proposals was set out in the SA Report. The findings of the SA informed this selection but they are not the sole source of information to inform decision-making as part of the plan preparation.

What are the likely significant effects of the draft DLP? How has the SA influenced the draft DLP?

27. Overall, the implementation of the policies and proposals presented in the draft DLP were found to have significant positive sustainability benefits, reflecting the iterative and ongoing inputs from the SA, the wider evidence base, and comments received through public and community consultations. The key positive effects are as follows:
- Major long term and cumulative positive effects through seeking to meet the special housing needs of the Dartmoor area - will also support economic objectives through supporting local people to live and work in the National Park; good quality housing will have direct cumulative positive effects on health and well-being
 - Ensuring that new development is located where supported by community services and facilities will promote positive effects
 - Support for the economy and employment – will also have further positive effects for health and wellbeing; also, for the character and vitality of settlements and the wider countryside
 - Landscape, character, biodiversity and historic/cultural assets and their settings are protected with at least neutral effects and no major significant negative effects predicted
28. Alongside the positive effects, some minor negative effects were also identified - as a result of the overall, cumulative effect of increased housing, employment and associated infrastructure development on the outskirts of the plan area through the Plymouth & SW Joint Core Strategy and the emerging Greater Exeter Strategic Plan. The key potential negative effects are summarised as follows:

- Cumulative negative effects on biodiversity through increased recreational disturbance – on internationally designated sites; also, on the wider biodiversity network and assets

How could negative effects be mitigated?

29. A key aspect of the SA process is to provide advice and recommendations to help mitigate identified negative effects - and to suggest possibilities to enhance positive effects. The policies and proposals presented in the draft DLP include findings arising from SA work undertaken. The findings of the SA helped the selection of potential site allocations by avoiding locations that might have significant negative effects, for example on internationally protected biodiversity, and also suggesting some site-specific recommendations that could provide mitigation measures.
30. Potential negative effects have been mitigated through strong policies that protect the natural environment and promote sustainable communities, whilst managing the Special Qualities of the National Park. The potential for increased recreational access and use may result in negative effects on the landscape, biodiversity and historic environment that provides the very attributes and attraction for visitors. The SA raised some concern over the potential cumulative effects of the extensive new development proposed by other plans around the outskirts of the National Park. The SA suggested that a Strategic Mitigation Plan could be considered with others that seeks to address such potential cumulative negative effects through a shared and equitable approach. The Dartmoor National Park Authority has confirmed that it will continue to liaise with relevant other local planning authorities and Natural England with regard to cumulative effects of recreational impacts arising from new development outside the Park, particularly for internationally designated sites.

EqIA & HRA

31. The equalities screening assessment has found that the draft DLP 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.
31. The HRA screening identified that due to the small size and location of proposed new development in the DLP, and the limited potential environmental pathways for impacts to the European sites outside of the National Park, there were no Likely Significant Effects (LSEs) for air quality changes, disturbance, changes to water quality or levels, or habitat loss/fragmentation – alone or in-combination with other plans.
32. The screening assessment identified uncertainty with regard to the potential for LSEs associated with air quality, disturbance and habitat loss or fragmentation on the three SACs located within the DNPA boundary. This was

investigated further through appropriate assessment that determined that due to the small size and location of the proposed new development, together with policy mitigation, significant adverse impacts on air quality and habitat loss or fragmentation can be avoided, alone or in-combination with other plans. However, due to the extensive new development planned around the outskirts of the National Park through the Plymouth & SW JLP and the emerging GESP, the HRA concluded that there some uncertainty regarding in-combination effects on the integrity of SACs from recreational disturbance. The HRA recommended continuing liaison between the DNPA and neighbouring local planning authorities to develop further strategic mitigation measures.

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. Some data gaps were identified – in particular for the significance of the wider biodiversity and historic resources.

Consultation

34. The proposed scope of the SA was consulted formally at the scoping stage in August 2017 with the statutory bodies (Historic England, Environment Agency, and Natural England) and through the DNPA's website for wider consultation with stakeholders and the public. Representations were received and minor amendments were made to the SA Scoping Report, including additional information for the baseline.
35. The Vision & Spatial Strategy Paper with the accompanying Initial SA Report (November 2017) were provided for consultation through the website in late 2017 for people to comment on if they wished. No specific comments on the SA, HRA or EqIA were received at this time. Consultation is a vital ongoing and iterative element of both the plan-making and the SA processes. The draft DLP and the accompanying SA Report (October 2018) were provided for consultation through the website in late 2018/early 2018. Comments received have been considered in the development of the Pre-Submission Draft Plan and the SA Report (June 2019).

Monitoring Proposals

36. Local planning authorities are required to produce Monitoring Reports (MRs) including indicators and targets against which the progress of the Plan can be assessed. There is also a requirement to monitor the predictions made in the SA and Government advises Councils to prepare a monitoring strategy that incorporates the needs of the two processes to make best use of shared information and resources. Monitoring proposals will be progressed, including

consultation, as the draft DLP progresses. The DNPA will prepare a monitoring strategy for the Local Plan that will include consideration of any specific requirements from the SA process.

Next Steps

37. The draft Dartmoor Local Plan to 2036 and this accompanying Sustainability Appraisal Report will be available for consultation during September to October 2019. Documents are available to download from the DNPA's website <https://www.dartmoor.gov.uk/living-and-working/planning/planning-policy/local-plan-review>. Any comments received on the SA will be submitted with the Regulation 19 Local Plan and supporting evidence to the Secretary of State. An independent examiner will be appointed in due course and hearing sessions will be undertaken at which the public and other interested stakeholders can attend.