



**DARTMOOR NATIONAL PARK AUTHORITY  
LOCAL PLAN 2018-2036**

**SUSTAINABILITY APPRAISAL (SA)**  
(Incorporating Strategic Environmental Assessment,  
Health Impact Assessment, and Equality Impact  
Assessment)

**ADOPTION STATEMENT**  
December 2021

# **DARTMOOR NATIONAL PARK AUTHORITY LOCAL PLAN REVIEW 2018-2036**

## **SUSTAINABILITY APPRAISAL (SA) (Incorporating Strategic Environmental Assessment, Health Impact Assessment, Equality Impact Assessment)**

### **SA Adoption Statement December 2021**

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## This SA Adoption Statement

- 1 Sustainability Appraisal (SA) is a systematic process that must be carried out during the preparation of a Local Plan relating to development – as set out in Section 19 of the Planning and Compulsory Purchase Act 2004 and in paragraph 32 of the National Planning Policy Framework (NPPF<sup>1</sup>, updated 2019 & revised 2021).
- 2 SA incorporates the requirements for Strategic Environmental Assessment (SEA) that seeks to provide a high level of protection of the environment and to contribute to promoting sustainable development by integrating environmental considerations into the process of preparing certain plans and programmes. The EU Directive is implemented in the UK through the SEA Regulations (2004)<sup>2</sup>.
- 3 In addition, the Authority chose to integrate the Health Impact Assessment (HIA) and Equality Impact Assessment (EqIA) processes within the overarching SA/SEA process. HIA is not a statutory requirement for National Park Authorities; however, health considerations are a requirement of the SEA process and thus the overall SA process. Public bodies have a duty<sup>3</sup> to assess the impact of their policies on different population groups to ensure that discrimination does not take place and where possible, to promote equality of opportunity. The SA, SEA, HIA and EqIA therefore all form part of the integrated Sustainability Appraisal (SA) process for the Dartmoor National Park Authority (DNPA) Local Plan.
- 4 The Authority is also required to undertake a Habitats Regulations Assessment (HRA) of the DNPA Local Plan. The HRA process has its own legislative drivers and requirements. Whilst the different processes can inform each other, it is important that the HRA remains distinguishable from the wider SA process. The HRA process has been undertaken in parallel to the SA and its findings have informed the SA, but the details have been reported separately.
- 5 The SA process comprises a number of stages that are designed to comply with the requirements of the SEA Regulations and as guided through Government Planning Practice<sup>4</sup>. This SA Adoption Statement satisfies the SA/SEA requirements for post adoption (Stage E) and demonstrates compliance with the requirements of the SEA Regulations as follows:
  - (a) *how environmental considerations have been integrated into the plan or programme;*
  - (b) *how the environmental report has been taken into account;*

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<sup>1</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>2</sup> <http://www.legislation.gov.uk/uksi/2004/1633/contents/made>

<sup>3</sup> Equality Act, 2010

<sup>4</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

*(c) how opinions expressed in response to— (i) the invitation referred to in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;*

*(d) how the results of any consultations entered into under regulation 14(4) have been taken into account;*

*(e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and*

*(f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.*

- 6 SA should demonstrate how the plan has addressed relevant economic, social, and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.

## Development of the Dartmoor NPA Local Plan 2018-2036

- 7 The Dartmoor National Park Authority has prepared a new Local Plan<sup>5</sup> that will replace the currently adopted Core Strategy (2008), and Development Management & Delivery development Plan document DPD (2013). The new Local Plan also includes its own waste and minerals policies as the National Park is not included in the Devon County Waste & Minerals Plan. Fundamental to the review of the Local Plan are the two statutory<sup>6</sup> purposes of the National Park designation and also, the duty of National Park Authorities in pursuing National Park purposes.
- 8 Considerable work and consultation have been undertaken since early preparation and consideration of issues in 2016 to develop the Local Plan. Various studies were undertaken to provide the evidence<sup>7</sup> base to inform decision-making and these included housing, economy, and transport; minerals and waste; the natural and historic environments; design and the built environment; strategic flood risk assessments; landscape sensitivity assessments; and recreational use. Systematic assessments of potential site options for possible development allocation were also undertaken.
- 9 The new Local Plan has been developed iteratively since early studies and consultations in 2016, through continuing technical studies, and with wide consultation to consider comments made. The proposed draft Dartmoor National Park Local Plan (DNPLP) was submitted to the Secretary of State for independent examination by a Planning Inspector on 22 September 2020. Hearing sessions were held virtually between 2 March and 12 March 2021.

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<sup>5</sup> <http://www.dartmoor.gov.uk/living-and-working/planning/planning-policy/local-plan-review>

<sup>6</sup> National Parks & Access to the Countryside Act 1949 as amended by the Environment Act 1995

<sup>7</sup> <https://www.dartmoor.gov.uk/living-and-working/planning/planning-policy/local-plan-review/local-plan-examination/core-documents>

- 10 The Inspector advised in her Post Hearing Action Point Note [ED42] (22 April 2021)<sup>8</sup> that she considered a number of actions to be necessary to inform her decision on whether the Plan is sound and/or how it could be made sound by Main Modifications (MMs). Following additional work, the proposed MMs to the draft DNPA Local Plan were published for public consultation between 7 June and 19 July 2021. The Inspector in her final report (1 November 2021)<sup>9</sup> concluded that with the recommended main modifications, the Dartmoor National Park Authority Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.
- 11 In accordance with the Authority's adopted Statement of Community Involvement (SCI November 2018)<sup>10</sup>, at each stage of the development of the Local Plan, formal and public consultation was undertaken to help ensure that stakeholders' views were taken into consideration in the next steps of plan preparation. Issues raised, and responses prepared have been documented during the development of the Local Plan and published on the Authority's website<sup>11</sup>.

## **How environmental & sustainability considerations have been integrated into the Local Plan; How the Sustainability/Environmental Report has been taken into account**

- 12 During the plan-making process, SA (incorporating SEA) has been carried out as an iterative and ongoing process to inform decision making for the developing Local Plan. The SA was undertaken in accordance with government guidance<sup>12</sup> which encourages a staged approach that integrates appraisal to consider the effects of the emerging plan on socio-economic as well as environmental factors. Since 2017, independent specialist consultants were appointed to carry out the SA for the Authority. They worked closely with the plan-making team in an iterative way such that the findings and recommendations from the SA were integrated into each developing stage of the Local Plan.
- 13 The SA used the same SA Framework developed during the SA scoping process (August 2017) as the basis for assessing the emerging DNPALP - and as explained in Section 2 of the submitted SA Report (June 2019). Relevant plans/programmes had been reviewed; baseline information regarding the character of the area and its likely evolution collated and analysed; and sustainability problems, issues and opportunities had been identified during

<sup>8</sup> [https://www.dartmoor.gov.uk/\\_data/assets/pdf\\_file/0030/385680/ED42-Dartmoor-Local-Plan-Inspector-Note-8-Post-Hearing-Action-Points.pdf](https://www.dartmoor.gov.uk/_data/assets/pdf_file/0030/385680/ED42-Dartmoor-Local-Plan-Inspector-Note-8-Post-Hearing-Action-Points.pdf)

<sup>9</sup> [https://www.dartmoor.gov.uk/\\_data/assets/pdf\\_file/0023/407381/Dartmoor-Local-Plan-2018-2036-Inspectors-Report.pdf](https://www.dartmoor.gov.uk/_data/assets/pdf_file/0023/407381/Dartmoor-Local-Plan-2018-2036-Inspectors-Report.pdf)

<sup>10</sup> [https://www.dartmoor.gov.uk/\\_data/assets/pdf\\_file/0024/76065/SCI-PUBLISHED.pdf](https://www.dartmoor.gov.uk/_data/assets/pdf_file/0024/76065/SCI-PUBLISHED.pdf)

<sup>11</sup> [https://www.dartmoor.gov.uk/\\_data/assets/pdf\\_file/0024/76065/SCI-PUBLISHED.pdf](https://www.dartmoor.gov.uk/_data/assets/pdf_file/0024/76065/SCI-PUBLISHED.pdf)

<sup>12</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

the SA scoping to compile a Framework of Objectives and Sub-Objectives/Decision-Aiding Questions that seek to resolve the sustainability issues identified and relevant to the plan and the Dartmoor National Park Authority area. The assessment used both quantitative and qualitative assessments, including defined thresholds of significance, where possible.

- 14 The SA considered the likely significant effects of the implementation of the Local Plan on the sustainability objectives for the Dartmoor NPA area. For each aspect of the Dartmoor NPA Local Plan, the assessment against the SA Objectives was recorded with a narrative describing any significant effects identified, mitigation of any significant negative effects, and any suggestions for enhancing potential beneficial effects. In line with requirements of the SEA Regulations, the appraisal considered effects including short, medium, and long term, permanent, and temporary, positive, and negative, secondary, cumulative, and synergistic, wherever possible and relevant. Any gaps or difficulties were also reported. The SA was informed by best available information and data to deal with the effects of the policies of the DNPALP as a whole.
- 15 Taking into account comments made during early consultation on issues, the plan-making process identified and investigated four approaches to developing a 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.

The SA tested these four options using the strategic SA Framework and the details were presented in Appendix II of the Initial SA Report (December 2017). The Authority decided to progress Option 3.

- 16 Potential development site options identified through the Land Availability Assessment studies (LAA, 2017)<sup>13</sup> and were subject to the Sites Assessment Method. All site options that were found to be reasonable – suitable and realistic – were subject to SA individually using the full sites SA framework.
- 17 Thus, relevant alternatives have been tested through the SA process in an iterative and ongoing way to inform plan-making. The SA reported outline reasons for progressing or rejecting strategic options and potential options for development site allocation. The findings and recommendations of the SA informed plan-making and were integrated into the development of the Local Plan - and as set out in the Submitted SA Report (June 2019).

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<sup>13</sup> <http://www.dartmoor.gov.uk/living-and-working/business/planning-policy/background-evidence/land-availability-assessment-shlaa>

- 18 Overall, the SA found that there was strong mitigation provided through policies to conserve or enhance landscape, biodiversity and the historic environment with likely residual effects that are at least neutral. The selection of proposed sites for new development through location, small size and type has been made carefully and to integrate with the existing built environment, thus minimising potential negative effects and optimising opportunities for positive effects where possible. Overall, provision of housing and employment land will have major positive effects that will be cumulative in the longer-term.
- 19 The SA identified some concern regarding the cumulative effects from additional recreational access and use of the National Park arising from the proposed major development around (outside) the boundary of the National Park. It is considered that there could be some uncertainty for cumulative negative effects on European protected sites and the wider biodiversity resource. The SA suggested that continuing collaboration with the relevant local planning authorities to develop a shared strategic mitigation approach could provide sufficient mitigation measures. The DNPA has stated its commitment to continuing to liaise with relevant local planning authorities and Natural England. Thus, mitigation measures are in place.
- 20 The Equality Impact Assessment (EqIA) found that the DNPA Local Plan is unlikely to have negative effects on protected characteristics or persons identified under the Equality Act 2010 and as a result a full EqIA will not be required. The Habitats Regulations Assessment (HRA) found that the DNPA Local Plan is considered unlikely to have significant effects on any European sites, alone or in-combination with other plans and projects.
- 21 Following submissions to the examination and discussions at the hearings, proposed Main Modifications (MMs) to the DNPALP were prepared and subject to SA. Many amendments are for updating and to provide further clarity and as such are not significant for SA and HRA. Many of the MMs were refinements that strengthened policies through making certain requirements explicit, for example, that net gain applies to all biodiversity – protected and not protected, and that great weight should be applied to designated historic assets.
- 22 These matters were explained and assessed in the SA Addendum Report (June 2021) accompanying the proposed Main Modifications to the Local Plan. Those MMs identified as potentially significant for SA/SEA and HRA were then considered using the same methods and assessors as for the submitted SA and HRA Reports. Overall, the previous findings of the SA/SEA remain relevant and valid. It was confirmed that there will be no significant negative effects and that positive effects have been optimised. The previous findings of the HRA/AA remain relevant and valid - the DNPA Local Plan will not have adverse effects on the integrity of protected sites, alone or in combination.

## How the results of consultation have been taken into account

- 23 Consultation is an important aspect of SA and there was statutory and public consultation at each key stage of the Local Plan preparation and the SA as follows:

<b>Dartmoor Local Plan Review Stage and Documents Consultation</b>	<b>SA/SEA Stage and Documents Consultation</b>
<b>Initial Evidence Gathering &amp; Technical Studies</b> Ongoing	
<b>Issues Paper</b> Consultation: 3 October 2016 – 13 January 2017 Issues Consultation Report (April 2017)	
	<b>SA/SEA Scoping Report</b> (August 2017) & <b>HRA Screening Report</b> (July 2017) Consultation: August-September 2017 Final SA/SEA Scoping Report (October 2017)
<b>Open Meetings with Parish &amp; Town Councils</b> October-November 2017	
<b>Vision &amp; Spatial Strategy Paper</b> (4 Strategic Options considered) Available on the DNPA website for comment	<b>Initial SA Report</b> (November 2017) (including SA of the 4 Strategic Options & SA of Site Options) Available on the DNPA website for comment
<b>Draft Local Plan (Regulation 18)</b> Consultation: 3 December 2018-4 February 2019	<b>SA Report &amp; HRA Report</b> (September 2018) Consultation: 3 December 2018-4 February 2019
<b>Pre-Submission Local Plan (Regulation 19)</b> Consultation: September-October 2019	<b>Pre-Submission SA Report &amp; HRA Report</b> Consultation:  September-October 2019
<b>Submission Examination</b> 22 September 2020 Hearing sessions 2 – 12 March 2021	<b>Submission Examination</b> 22 September 2020 Hearing sessions 2 – 12 March 2021
<b>Local Plan Adoption</b> December 2021	<b>SA Adoption Statement</b> December 2021

- 24 SA and consultation responses have been considered in an iterative and ongoing way with the plan-making process and in accordance with the requirements of the SEA Regulations. Representations have been recorded and the responses made to issues and concerns raised have been published, including at key statutory stages, as follows:



- SA Scoping Report (August 2017)
- Appendix VII of Preferred Options SA Report (September 2018) summarises SA representations to consultation and responses
- Appendix VII of Pre-Submission SA Report (June 2019) summarises SA representations to consultation and responses
- The SA Addendum Report (July 2021) outlines issues raised and discussed at the examination and resulting in the proposed Main Modifications

All consultation representations and responses are available on the Authority's website under pages for the Local Plan Examination<sup>14</sup>.

## Reasons for choosing the Local Plan as adopted, in the light of other reasonable alternatives

- 24 The SEA Regulations require assessment of the likely significant effects of implementing the plan and "reasonable alternatives" taking into account the objectives and geographical scope of the plan; and the reasons for selecting alternatives should be outlined in the Report. The UK Government's planning practice guidance<sup>15</sup> states that "*reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable*".
- 25 Strategic options for the plan and potential development site allocation options were investigated and tested through SA using the SA framework of objectives in a comparable and consistent manner. The findings were reported in the SA Report (June 2019) and detailed in Appendices IV & V (June 2019). The reasons for selecting and rejecting strategic options and site options were outlined in Table 5.2 & Table 6.2 and in accordance with the requirements of the SEA Regulations.
- 26 The 'do-nothing' scenario is not an option for a Local Plan as the DNPA is required to provide sufficient development land to meet the needs of the local communities for housing and employment. Overall, the reasons for choosing the DNPA Local Plan as adopted include that the adopted Plan progresses the overall Vision and for high quality development in the Dartmoor NPA area, meeting identified needs for housing and employment whilst avoiding significant change to the intrinsic character and special qualities of the area – and, securing the most benefits and the least negative effects for sustainable development.

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<sup>14</sup> <https://www.dartmoor.gov.uk/living-and-working/planning/planning-policy/local-plan-review/local-plan-examination>

<sup>15</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

## Measures that are to be taken to monitor the significant sustainability/ environmental effects of the implementation of the Local Plan

- 27 The SEA Regulations require that the significant environmental effects of implementing the plan should be monitored with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action. Local Planning Authorities are required to produce Monitoring Reports on the progress of Local Plans. Government Guidance on SA/SEA advises a pragmatic approach with shared monitoring for the SA/SEA and the Plan.
- 28 The DNPALP includes Appendix A on Monitoring that summarises the key topics and indicators that will inform the monitoring of the performance of policies. These indicators also relate to the SA Framework. It is considered that these indicators will be sufficient to identify any unforeseen adverse effects at an early stage and provide information on the predicted effects from the SA.
- 29 The Monitoring Framework of Indicators will be used as the basis for future annual monitoring by the Authority and incorporated into the Authority's Monitoring Report available to view on the DNPA website<sup>16</sup>. No additional proposed monitoring that might be required as part of the SEA process was indicated from the findings of the SA.

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<sup>16</sup> <https://www.dartmoor.gov.uk/living-and-working/business/planning-policy/background-evidence/background-evidence-and-research/strategy-and-planning-applications>