



# **DARTMOOR NATIONAL PARK AUTHORITY LOCAL PLAN REVIEW 2021-2036**

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

**SA Report  
June 2019**

*enfusion* 

# DARTMOOR NATIONAL PARK AUTHORITY LOCAL PLAN REVIEW 2021-2036

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

### SA Report

<i>date:</i>	Initial SA Report December 2017 Regulation 18 SA Report September 2018 DRAFT October 2018 Final Regulation 19 SA Report June 2019 Draft	
<i>prepared for:</i>	Dartmoor National Park Authority	
<i>prepared by:</i>	Barbara Carroll Owen Jeffreys David Payne	Enfusion Enfusion Cissbury Consulting
<i>quality assurance:</i>	Barbara Carroll	Enfusion



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## 1.0 INTRODUCTION

### **Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA), Equalities Impact Assessment (EqIA) and Habitats Regulations Assessment (HRA)**

- 1.1 Sustainability Appraisal (SA) is a systematic process that must be carried out during the preparation of a Local Plan. The purpose of a Sustainability Appraisal is to promote sustainable development through assessing the extent to which an emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives<sup>1</sup>.
- 1.2 The requirement for SA is set out in Section 19 of the Planning and Compulsory Purchase Act 2004 and in Paragraph 32 of the National Planning Policy Framework (NPPF, 2018). Local Plans must also be subject to Strategic Environmental Assessment<sup>2,3</sup> (SEA) and Government guidance<sup>4</sup> recommends that SA incorporates the requirements for SEA – and to the same level of detail. The aim of SEA is to provide for a high level of protection of the environment and to promote sustainable development. Dartmoor National Park Authority (DNPA) has commissioned independent specialist consultants Enfusion Ltd to undertake the SA process for the Review of the Dartmoor Local Plan.
- 1.3 In addition, DNPA has chosen to integrate the Equality Impact Assessment (EqIA) process within the overarching SA/SEA process. Public bodies have a duty 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. Health Impact Assessment (HIA) is not a statutory requirement for planning authorities but it is good practice in plan-making; health considerations are a requirement of the SEA process and thus the overall SA process.
- 1.4 The DNPA is also required to undertake a Habitats Regulations Assessment (HRA) of the Dartmoor Local Plan Review. The aim of the HRA process is to assess the potential effects arising from a plan against the nature conservation objectives of any site designated for its nature conservation importance. The HRA process has its own legislative drivers and requirements and while the different processes can inform each other, it is important that the HRA remains distinguishable from the wider SA process. While the HRA process is being undertaken in parallel to the SA, the detailed method and findings are reported separately and the findings of the HRA have informed the SA.

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<sup>1</sup> Planning Practice Guidance Strategic Environmental Assessment & Sustainability Appraisal  
<https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#sustainability-appraisal-requirements-for-local-plans>

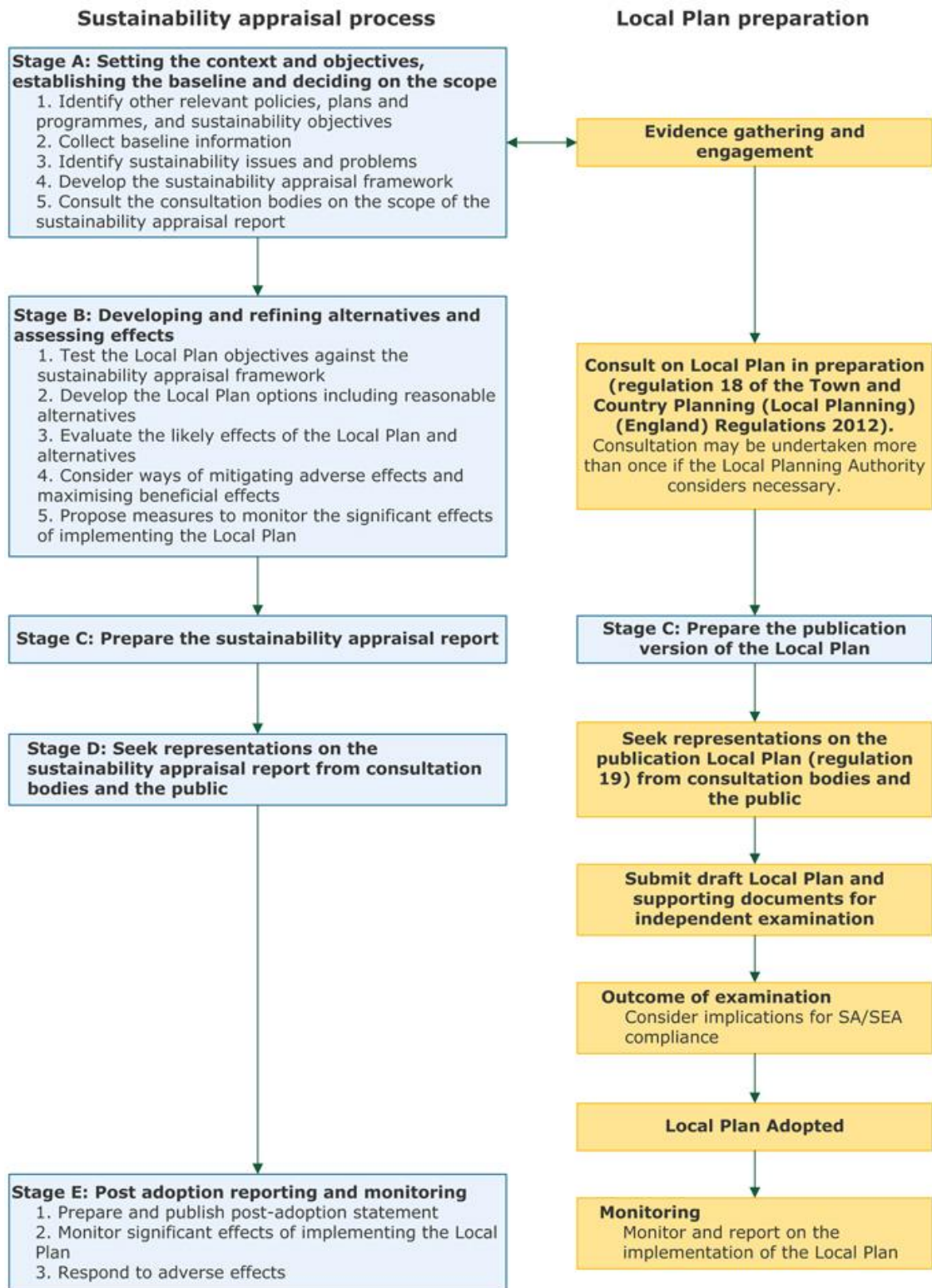
<sup>2</sup> EU Directive 2001/42/EC

<sup>3</sup> Environmental Assessment of Plans and Programmes Regulations, 2004

<sup>4</sup> Planning Practice Guidance Strategic Environmental Assessment & Sustainability Appraisal  
<https://www.gov.uk/government/collections/planning-practice-guidance>

- 1.5 National Planning Practice Guidance sets out the key stages and tasks for the SA process and their relationship with the Local Plan process – as illustrated in the following Figure 1.1. These key stages and tasks are applicable to the SA process for the Dartmoor Local Plan. It is important to note that SA is an iterative and on-going process. Stages and tasks in the SA process may be revisited and updated or revised as a plan develops, to take account of updated or new evidence as well as consultation responses.

**Figure 1.1: SA and Plan-making Stages and Tasks**



- 1.6 The scoping stage is the first stage of the SA process (Stage A), and it aims to identify the scope and level of detail of the information to be included in the SA Report. It sets out the context, objectives and proposed approach for the assessment; it identifies key issues and opportunities to develop a framework of SA objectives that will form the basis against which the emerging elements of the plan will be assessed.
- 1.7 The draft SA Scoping Report was sent to the statutory environmental bodies – Environment Agency, Historic England and Natural England – and Devon County Council for the 5-week consultation period during August-September 2017. It was also sent to the nearby District Councils and made available online for public comment. Comments received were collated and responses made – as set out in the Appendix to the Final SA Scoping Report (October 2017); comments were received from the statutory environmental bodies and the County Council.
- 1.8 The next stage of the SA process is concerned with developing and refining alternatives and assessing effects (Stage B). An Initial SA Report (December 2017) provided information on the scoping and methods used in the process. It focused on the early stage of plan-making with the draft Vision for the Local Plan Review and the testing of possible options for the proposed Spatial Strategy. The SA Report (October 2018) provided information on the progress of SA Stage B as the emerging elements of the Local Plan Review have been assessed through the SA process. The SA tested the options for potential site allocations that had progressed through the Land Availability Assessment (LAA)<sup>5</sup> studies and sites assessment method and assessed the draft Policies. The SA Report accompanied the draft Local Plan Review on Regulation 18 consultation.
- 1.9 This SA Report (June 2019) progresses SA Stage B further as the draft plan has been developed to take into account consultation comments and updated evidence. The SA tested the amendments made to the plan as it was developed to the Regulation 19 Pre-Submission Draft. Additions and changes to Policies and Proposals were considered, together with the implications for the SA of implementing the draft plan as a whole. This SA Report progresses SA Stage C – the SA Report and accompanies the Draft Plan on Regulation 19 Pre-Submission consultation. The findings of the SA have continued to inform plan-making in an iterative way.

### **The Dartmoor Local Plan Review 2021-2036**

- 1.10 Dartmoor National Park Authority is undertaking a review<sup>6</sup> 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 and cover such issues as: house extensions, design, the environment, listed buildings, housing, farming, tourism, quarrying, and land for development. It will include its own

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<sup>5</sup> <http://www.dartmoor.gov.uk/living-and-working/business/planning-policy/background-evidence/land-availability-assessment-shlaa>

<sup>6</sup> <http://www.dartmoor.gov.uk/living-and-working/planning/planning-policy/local-plan-review>

waste and minerals policies as the National Park is not included in the Devon County Waste & Minerals Plan.

1.11 Fundamental to the review of the Local Plan are the two statutory<sup>7</sup> 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

The location of the Dartmoor National Park is shown on the figure following:

**Figure 1.2: Location of Dartmoor National Park<sup>8</sup>**



<sup>7</sup> National Parks & Access to the Countryside Act 1949 as amended by the Environment Act 1995

<sup>8</sup> Dartmoor National Park Authority

- 1.12 A first consultation for the Local Plan Review was undertaken, with an Issues Consultation Paper published in October 2016, offering residents, communities, visitors, businesses and other organisations an early opportunity to give their views on how the new local plan should guide future development. An Issues Consultation Report (April 2017<sup>9</sup>) summarises the written responses received and notes of meetings and drop in events held during the consultation period.
- 1.13 The DNPA considered the responses received from the Issues Paper consultation and discussions in order to draft a revised Vision for the Local Plan Review that seeks to address concerns and aspirations for guiding development in the Park area. The role of a Spatial Strategy is to provide direction for other policies, adding a spatial dimension that promotes opportunities for development and change in the most appropriate locations, whilst resisting development in certain places that would be undesirable. The DNPA has explored four approaches to developing a Spatial Strategy and these are discussed in the Topic Paper Vision & Spatial Strategy (October 2017) that was available on the Authority's website for people to comment on if they wish. The draft Vision and options for the Spatial Strategy have been tested through the SA process and details provided in the Initial SA Report (December 2017).
- 1.14 At the same time, the DNPA continued to collect evidence including the Land Availability Assessment (LAA)<sup>10</sup> that considers whether a site could be developed. It identifies potential sites for housing, employment and traveller uses and assesses whether these are developable, how much development could be accommodated on them and whether they could be delivered within 5, 10 or 15-year time frames. The DNPA discussed with the Parish and Town Councils of the largest settlements in the Park about which of these potential site options should be developed. The reasonable alternative options for site allocation were tested through SA - in line with the requirements of the SEA Regulations (and as explained later in this SA Report in Section 4).
- 1.15 The Dartmoor Local Plan Regulation 19 draft comprises the Vision and Strategic Policies (SPs) including the Spatial Strategy appropriate to planning and caring for the National Park and meeting with its purpose and duty. It includes Policies (Ps) organised into themes: Environment; Housing; Communities, Services & Infrastructure; Economy; Minerals, Waste & Energy; Towns, Villages & Development Sites – with proposed site allocations for housing and employment land.
- 1.16 The Draft DLP is structured into 7 chapters with policies as follows:

### **1 Vision, Spatial Strategy & Planning Applications**

SP1.1 Delivering National Park purposes and protecting Dartmoor's Special Qualities

SP1.2 Sustainable development in Dartmoor National Park

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<sup>9</sup> <http://www.dartmoor.gov.uk/living-and-working/planning/planning-policy/local-plan-review>

<sup>10</sup> <http://www.dartmoor.gov.uk/living-and-working/planning/planning-policy/background-evidence/land-availability-assessment-shlaa>

- SP1.3 Presumption in favour of sustainable development
- SP1.4 Spatial Strategy
- SP1.5 Major Development
- SP1.6 Delivering good design
- P1.7 Sustainable construction
- P1.8 Protecting local amenity in Dartmoor National Park
- P1.9 Higher risk development and sites

## **2 Environment**

- SP2.1 Protecting the character of Dartmoor's landscape
- SP2.2 Conserving and enhancing Dartmoor's biodiversity and geodiversity
- P2.3 Biodiversity Net Gain
- SP2.4 Conserving and enhancing Dartmoor's moorland, heathland and woodland
- SP2.5 Protecting tranquillity and dark night skies
- SP2.6 Conserving and enhancing heritage assets
- SP2.7 Conservation of historic non-residential buildings in the open countryside
- SP2.8 Enabling Development
- P2.9 Water environment and flood risk

## **3 Housing**

- SP3.1 Meeting Housing Need in Dartmoor National Park
- SP3.2 Size and accessibility of new housing
- SP3.3 Housing in Local Centres
- SP3.4 Housing in Rural Settlements
- SP3.5 Housing in Villages and Hamlets
- P3.6 Custom and Self-Build Housing
- P3.7 Residential alterations, extensions and outbuildings
- P3.8 Replacement Homes
- P3.9 Rural Workers' Housing
- P3.10 Residential annexes to support farming
- P3.11 Gypsy and Traveller Accommodation
- P3.12 Low Impact Development

## **4 Communities, Services and Infrastructure**

- SP4.1 Supporting community services and facilities
- SP4.2 Supporting public open space and sports facilities
- P4.3 Enabling sustainable transport
- P4.4 Parking standards for new development
- P4.5 Electric Vehicle Charging Points (EVCPs)
- P4.6 Public car parks
- P4.7 Signs and Advertisements
- P4.8 Telecommunications Development
- SP4.9 The Access Network

## **5 Economy**

- P5.1 Non-Residential Business and Tourism Development
- P5.2 Development affecting Town Centres
- P5.3 Shops and other active uses
- P5.4 Residential Business and Tourism Development
- P5.5 Staff accommodation for serviced accommodation businesses

- P5.6 Camping and touring caravan sites
- P5.7 Agriculture, forestry and rural land-based enterprise development
- P5.8 Farm diversification
- P5.9 Equestrian development

## **6 Minerals, Waste and Energy**

- SP6.1 New or Extended Minerals Operations
- SP6.2 Minimising the Impact of Minerals Operations
- SP6.3 Minerals Safeguarding
- P6.4 Waste Prevention
- P6.5 Waste Disposal and Recycling Facilities
- P6.6 Renewable energy development

## **7 Towns, Villages and Development Sites**

- P 7.1 Settlement Boundaries and Development Sites
- P7.2 Community Planning
- 7.3-7.25 Site Allocations:
  - Proposal 7.3 Land at Longstone Cross, Ashburton
  - Proposal 7.4 Land at Chuley Road, Ashburton
  - Proposal 7.5 Land at Barn Park, Buckfastleigh
  - Proposal 7.6 Land at Holne Road, Buckfastleigh
  - Proposal 7.7 Land at Lamb Park, Chagford
  - Proposal 7.8 Land at Crannafords, Chagford
  - Proposal 7.9 Land at New Park, Horrabridge
  - Proposal 7.10 Land at Betton Way, Moretonhampstead
  - Proposal 7.11 Land at Forder Farm, Moretonhampstead
  - Proposal 7.12 Land at Thompsons, Moretonhampstead
  - Policy 7.13 Land at Dartmoor Prison, Princetown
  - Proposal 7.14 Land at Palstone Lane (a) South Brent
  - Proposal 7.15 Land at Palstone Lane (b) South Brent
  - Proposal 7.16 Land at Fairfield, South Brent
  - Proposal 7.17 Land at Station Yard, South Brent
  - Proposal 7.18 Land at Elfordtown Farm, Yelverton
  - Proposal 7.19 Land at Binkham Hill, Yelverton
  - Policy 7.20 Yelverton Special Policy Area
  - Proposal 7.21 Land at Axminster Carpets, Buckfast
  - Proposal 7.22 Land off Warren Road, Mary Tavy
  - Proposal 7.23 Land in Mary Tavy
  - Policy 7.24 South Zeal Special Policy Area

## **Consultation**

- 1.17 The DNPA has consulted widely throughout the early preparation of the Local Plan Review, including through their website<sup>11</sup>. Comments received have been considered at each stage and taken into account in the next stage of plan-making. A report of the Issues Consultation 3 October 2016 – 13 January 2017 was published<sup>12</sup>.

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<sup>11</sup> <http://www.dartmoor.gov.uk/living-and-working/planning/planning-policy/local-plan-review>

<sup>12</sup> [http://www.dartmoor.gov.uk/\\_data/assets/pdf\\_file/0009/957150/2017-04-19\\_Issues\\_Consultation\\_Response\\_SummaryV2.pdf](http://www.dartmoor.gov.uk/_data/assets/pdf_file/0009/957150/2017-04-19_Issues_Consultation_Response_SummaryV2.pdf)

- 1.18 The SA Scoping Report (August 2017) and HRA Screening Report (July 2017) were subject to statutory consultation with the environmental bodies – Environment Agency, Historic England, Natural England – for the 5-week statutory requirement during August-September 2017; also sent to the nearby District Councils and made available on the DNPA website to the public for comment on if they wish. Comments were received from the environmental bodies and the County Council and were taken into account to finalise the SA Scoping Report (October 2017).
- 1.19 Comments received on the Vision & Spatial Strategy Paper and at the discussion meetings with local communities were taken into account to prepare the next draft of the Local Plan at Regulation 18. The findings of the SA and HRA were also been taken into consideration, together with other technical evidence<sup>13</sup>. Comments made through the Regulation 18 consultation have been taken into consideration in developing the Pre-Submission Regulation 19 draft Plan and its accompanying SA (this SA Report).
- 1.20 The SA and HRA studies and findings continue to inform the ongoing development of the Dartmoor Local Plan and comprise part of the evidence base for the emerging plan. SA Reports accompany the stages of the plan as set out in the following Table 1.1 with the chronology of the plan preparation, consultation and the accompanying SA/SEA stages:

**Table 1.1: Dartmoor Local Plan with SA/SEA Stages and Documents**

<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

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

<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 &amp; Examination</b> TBC 2019-2020	<b>Submission &amp; Examination</b> TBC 2019-2020
<b>Local Plan Adoption</b>	<b>SA Adoption Statement</b>

## Compliance with the Requirements of the EU SEA Directive

- 1.21 The Strategic Environmental Assessment Regulations set out certain requirements for reporting the SEA process and specify that, if an integrated appraisal is undertaken (i.e. SEA is subsumed within the SA process), then the sections of the SA Report that meet the requirements set out for reporting the SEA process must be clearly signposted. This SA Report presents the SA/SEA testing of the emerging new Local Plan and includes a Non-Technical Summary and an appendix that clearly signposts the requirements for reporting the SEA.

## Purpose & Structure of this SA Report

- 1.22 This document reports the SA/SEA process for the Dartmoor Local Plan Review. Following this introductory Section 1, this report is structured into further sections:
- Section 2 describes the approach and methods used to appraise the emerging elements of the Plan
  - Section 3 summarises the sustainability context and characteristics with details available in the Final SA Scoping Report (October 2017) available on the DNPA website
  - Section 4 explains how options in plan-making and alternatives in SA/SEA have been addressed and reported explicitly to demonstrate compliance with the requirements of the EU SEA Directive
  - Section 5 summarises the findings of the SA of the draft Vision and the strategic options investigated for the Spatial Strategy
  - Section 6 describes the SA of the Regulation 18 draft plan, including Policies, site options and proposed site allocations; it integrates summary findings from the EqIA and the HRA
  - Section 7 explains the development of the draft plan from Regulation 18 to Regulation 19; describes the significance of changes for the SA findings; describes the SA of the Regulation 19

draft plan, including Strategic Policies, Policies, and Proposals; it continues to integrate the summary findings from the HRA and EqlA

- Section 8 introduces the approach to monitoring and the SA
- Section 9 provides summary conclusions from the SA, sets out the requirements for consultation and commenting on the report, and explains the next steps.

- 1.23 Technical Appendices provide the detailed findings of the SA. Appendix I comprises the Statement of Compliance with the SEA Directive and provides signposting to where key aspects of the SA are located in the SA Report. Appendix II is the SA Scoping Report (available separately) and including the details of the baseline evidence and the development of the SA Frameworks for assessment. Appendix III details the compatibility analysis for the draft Plan Vision. Appendix IV details the SA of the four options for the Spatial Strategy. Appendix V details the SA of the site options. Appendix VI (also available separately) is the Equality Impact Assessment (EqlA) Screening Report. Representations to consultations and responses made are reported in Appendix VII.

## 2.0 SUSTAINABILITY APPRAISAL METHODS

### Introduction & the SA/SEA Process

- 2.1 Sustainability (Integrated) Appraisal incorporating Strategic Environmental Assessment is an iterative and ongoing process that aims to provide a high level of protection for the environment and to promote sustainable development for plan-making. The role of SA is to inform the DNPA as the planning authority; the SA findings do not form the sole basis for decision-making – this is informed also by other studies, feasibility and feedback comments from consultation. SA is a criteria-based assessment process with objectives aligned with the issues for sustainable development that are relevant to the plan and the characteristics of the plan area.
- 2.2 There is a tiering of appraisal/assessment processes (and see also later Figure 4.1) that aligns with the hierarchy of plans – from international, national and through to local. This tiering is acknowledged by the NPPF (2018) in paragraph 35b that states that evidence should be proportionate. Planning guidance advises<sup>14</sup> that the SA should focus on what it needed to assess the likely significant effects of the Local Plan. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan.
- 2.3 This SA is an Integrated Appraisal that has incorporated the requirements of the EU SEA Directive. It also integrates the findings from the Habitats Regulations Assessment (HRA), and the findings of the Equality and Diversity Impact Assessment (EqIA). Since the HRA and the EqIA are driven by distinct legislation, the HRA Report and the EqIA Report are also provided separately to clearly demonstrate compliance.

### Scoping & the SA Frameworks

- 2.4 In April 2017, independent specialist consultants at Enfusion Ltd were commissioned by the DNPA to undertake the integrated SA and HRA. The first stage was to undertake the scoping process. Relevant plans and programmes (PP) were reviewed, baseline information was identified, collated and analysed to ensure that key issues, problems and opportunities for the DNPA area are identified. The details of this analysis are presented in final SA Scoping Report (October 2017) and a summary is provided in the following Section 3 of this SA Report.
- 2.5 The SA Framework provides the basis by which the sustainability effects of the Dartmoor Local Plan Review are described, evaluated and options compared. It includes a number of objectives, elaborated by decision making criteria, that are relevant to the objectives of the Local Plan, the role and duties of the Dartmoor NPA, and sustainable development in the

<sup>14</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#sustainability-appraisal-requirements-for-local-plans>

Dartmoor area. These objectives have been identified through the SA Scoping Stage from the information collated in the PP review, baseline analysis, identification of sustainability issues, and discussions with DNPA Officers. Two SA Frameworks (strategic & sites) were developed through the scoping process. These were subject to statutory consultation on the draft SA Scoping Report (August 2017) and as a result of comments received<sup>15</sup>, an additional decision-aiding question based on Historic Landscape Character for SA Objective No 4 was included.

- 2.6 The Strategic SA Framework is presented in Table 2.2 below and was used to test strategic options emerging from plan-making, such as the options for the Spatial Strategy, and the draft Policies. The Strategic SA Framework was refined to make it more relevant and effective for the consideration of site options that are locationally specific. For the Sites SA Framework, Enfusion worked closely with DNPA Officers to develop standards and thresholds to determine the nature and significance of effects against SA Objectives – and to be relevant taking into account the special role and duties of the National Park. This helps to ensure that a consistent and comparative appraisal of reasonable site options is carried out. Any assumptions and uncertainties are noted along with a clear indication of the standards and thresholds that will be used to determine the nature and significance of the effects for site allocation options.
- 2.7 The Sites SA Framework is presented in Table 2.3 below and reflects the more locationally specific nature of site options. It sets out the standards and thresholds that will be used to determine the nature and significance of effects against SA Objectives, including any assumptions or uncertainties that will be made. It may be noted that the Sites SA Framework (Table 2.3) was developed alongside the DNPA's site assessment process to ensure that they are consistent and correlate with each other.
- 2.8 The categories of significance used with both SA Frameworks are as set out in the key below:

**Table 2.1: SA Significance Key**

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

<sup>15</sup> Please see also Appendix VII of this SA Report

0	Neutral	Neutral effect
N/A	Not Applicable	
<p>Some factors may have two symbols:</p> <p>SA 1: First symbol landscape, second symbol settlement character;</p> <p>SA 3: First symbol biodiversity, second Green Infrastructure;</p> <p>SA 5: First symbol soil, second symbol relates to minerals;</p> <p>SA 6: First water resources, second water quality;</p> <p>SA 11: First symbol open space, second green infrastructure.</p>		

**Table 2.2: Strategic SA Framework**

Key Sustainability Issues	SA Objectives	Decision-Aiding Questions Are the proposals in the Plan likely to...?	Potential Indicators <sup>16</sup>
<b>Theme: Landscape and Settlement Character</b> SEA Directive Topic(s): Landscape NPPF Paragraphs: 109-125			
<ul style="list-style-type: none"> <li>■ New development has the potential for an unacceptable effect on the landscape or settlement character &amp; their settings.</li> <li>■ High quality design needs to be promoted to make positive contributions to the landscape and townscape in the National Park.</li> <li>■ Identification of appropriate standards and aspirations for sustainable construction and operation.</li> <li>■ Deterioration of the Valued Attributes of key Landscape Character Types that may be at risk should be prevented.</li> <li>■ Farming practises and forestry activities should not result in landscape deterioration through new access ways such as tracks, new buildings and changes in practises.</li> <li>■ The impact of light pollution from peripheral towns and cities, and development within the National Park, which threatens the dark night skies of Dartmoor, should be minimised.</li> <li>■ Change of farmsteads to residential or holiday lets can harm the integration of farmsteads with the landscape through additional buildings and suburban gardens.</li> </ul>	<b>1.</b> To conserve and enhance the landscape and settlement character of Dartmoor National Park	<ul style="list-style-type: none"> <li>■ Have an effect on the special landscapes, valued attributes, townscapes &amp; their settings?</li> <li>■ Reduce the impacts of large structures &amp; development that are visible from or within the National Park?</li> <li>■ Reduce the adverse effects of agricultural change (land use change, equestrian use, building conversions) on the landscape?</li> <li>■ Contribute to the wild, remote &amp; tranquil characteristics of Dartmoor, including minimising light and noise pollution?</li> </ul>	Number of conversions of agricultural buildings to dwellings/holiday lets  Loss or damage to key landscape features as a result of development
	<b>2.</b> To conserve & enhance the character, safety, accessibility, adaptability, and sustainability, including energy efficiency, of the	<ul style="list-style-type: none"> <li>■ Encourage the use of local and traditional building materials?</li> <li>■ Promote a high standard of quality in design, construction &amp; operation to promote</li> </ul>	Use of local and/or traditional building materials  National technical standards for Building Regulations and consideration of more aspirational standards such as BRE Home Quality Mark

<sup>16</sup> Indicators will be developed as the SA progresses and to align with indicators in Monitoring Report for the Local Plan as recommended by Government guidance

<ul style="list-style-type: none"> <li>■ New infrastructure relating to tourism, including signage can damage landscape character, and infrastructure such as telephone masts, could affect the special characteristics of the landscape.</li> </ul>	<p>built environment by raising the quality of design and construction</p>	<p>sustainable management of resources<sup>17</sup></p> <ul style="list-style-type: none"> <li>■ Enhance the distinctiveness &amp; diversity of the local built environment and community spaces?</li> <li>■ Promote a high standard of access and adaptability?</li> </ul>	
<b>Theme: Biodiversity, Geodiversity and Green Infrastructure</b> SEA Directive Topic(s): Biodiversity, Flora and Fauna NPPF Paragraphs: 109-125			
<ul style="list-style-type: none"> <li>■ Dartmoor has internationally, nationally and locally designated biodiversity and geodiversity which cover a large area of the National Park, most of which are in good or recovering condition, and need to be protected from effects of development.</li> <li>■ Managing access so that designated sites, priority habitat and priority species are not negatively affected by recreational activities.</li> <li>■ Encouraging sustainable farming practises, and engaging farmers to ensure agricultural methods and development arising from agricultural practises do not result in negative effects on biodiversity.</li> <li>■ Increasing stepping stones and habitat linkages to promote wildlife movement within Dartmoor.</li> <li>■ Dartmoor has a higher than national average of SSSIs in 'Favourable' or 'Unfavourable</li> </ul>	<p><b>3.</b> To protect, enhance and manage biodiversity and geodiversity for net gain, where possible<sup>18</sup></p>	<ul style="list-style-type: none"> <li>■ Have any effects on internationally or nationally designated biodiversity or geodiversity?</li> <li>■ Have any effects on local biodiversity or geodiversity?</li> <li>■ Contribute to enhancement of the Green Infrastructure network</li> <li>■ Contribute to enhanced understanding through provision of further studies/surveys</li> <li>■ Enable good farming practice</li> <li>■ Enable good woodland management</li> </ul>	<p>Number of SACs &amp; SSSIs in favourable or unfavourable condition</p> <p>Area of new BAP habitats created/restored</p> <p>Proportion of Local Wildlife Sites where positive conservation management is being implemented</p> <p>Contributions towards aims for GI Strategies</p>

<sup>17</sup> Please note that sustainable resources management is primarily addressed under Soils, Water, & Transport; here for design criteria this relates to attractiveness, safety & energy to avoid duplication at the SA assessment stages

<sup>18</sup> MHCLG NPPF (2018) paragraph 170d refers

<p>recovering' condition, with an aim to improve sites which are currently in an 'unfavourable' condition.</p> <ul style="list-style-type: none"> <li>Need to ensure that development does not result in the loss or damage of key habitats and wildlife.</li> <li>Climate change will threaten Dartmoor's varied habitats and wide range of species.</li> <li>Awareness of currently undesignated areas of biodiversity which may have the potential for designation, and which are still important for local biodiversity and require protecting.</li> <li>Ensuring forestry activities are sustainable and do not degrade or result in the loss of key habitats or biodiversity.</li> </ul>			
<p><b>Theme: Historic Environment</b> SEA Directive Topic(s): Cultural Heritage NPPF Paragraphs: 126-141</p>			
<ul style="list-style-type: none"> <li>Within the National Park there is a range of historical and archaeological features, both designated and undesignated, most of which are in good condition.</li> <li>The setting of designated heritage assets such as Listed Buildings and Scheduled Monuments should be protected from development.</li> <li>Taking active measure to conserve and improve heritage assets which are considered to be 'At Risk'.</li> <li>Protect historic farmsteads and farm buildings, and promote the reuse of derelict or abandoned buildings without adverse effects on the character and cultural heritage of the National Park.</li> <li>Increase knowledge and identify undesignated local archaeological and historical features.</li> </ul>	<p><b>4.</b> To protect, conserve, and enhance the historic environment and its setting</p>	<ul style="list-style-type: none"> <li>Protect, conserve &amp; enhance designated and non-designated heritage assets and their settings?</li> <li>Conserve the character of historic environment including historic landscapes?</li> <li>Improve access to and understanding of heritage?</li> <li>Provide opportunities to enhance knowledge on the archaeological resource?</li> </ul>	<p>Number of Listed Buildings Number of heritage assets on the 'At Risk' register Conservation Area enhancement projects Restoration of archaeological assets Archaeological surveys conducted</p>

<ul style="list-style-type: none"> <li>Avoid the character of designated Conservation Areas being affected from poorly designed new development and modifications to vernacular buildings.</li> </ul>			
<b>Theme: Soils, Land &amp; Minerals</b> SEA Directive Topic(s): Soil NPPF Paragraphs: 79-92, 109-125			
<ul style="list-style-type: none"> <li>Avoid development which leads to the loss of the best agricultural land, and ensure important soil resources are not degraded or lost - this is a national issue.</li> <li>Helping to ensure that any new proposals for mining or quarrying operations do not negatively affect the special qualities of the National Park.</li> <li>Promote use of previously developed land for development.</li> <li>Avoid development in Mineral Safeguarded Areas which would sterilise resources.</li> </ul>	<b>5.</b> To protect and conserve soil, land and minerals	<ul style="list-style-type: none"> <li>Result in the loss of soils and agricultural land?</li> <li>Make the best use of brownfield land?</li> <li>Promote sustainable mineral extraction?</li> <li>Protect future mineral resources?</li> <li>Minimise the risk of contaminating soils?</li> </ul>	Loss of agricultural land Number of planning permissions built on previously developed land Loss of greenfield/brownfield
<b>Theme: Water - Resources, Quality and Flooding</b> SEA Directive Topic(s): Water NPPF Paragraphs: 99-125			
<ul style="list-style-type: none"> <li>To improve water quality throughout the National Park, helping to ensure that at least 60% of water bodies and monitored water length meet good status by 2021 as required by WFD through the Environment Agency (EA).</li> <li>Promote sustainable management of water resources in new and existing developments.</li> <li>Avoid development in areas of flood risk.</li> <li>Investigate opportunities to manage flood risk in upper catchments through changed habitats and land use practices</li> </ul>	<b>6.</b> To promote efficient water use and improve water quality	<ul style="list-style-type: none"> <li>Promote sustainable water management and water use efficiencies?</li> <li>Result in any loss of quality or quantity that could affect WFD objectives for good ecological status?</li> </ul>	Quality of waterbodies meeting WFD objectives
	<b>7.</b> To reduce the risk of flooding from all sources and	<ul style="list-style-type: none"> <li>Propose development in the flood plain, Critical Drainage</li> </ul>	Number of planning permissions granted contrary to EA advice

	manage flood risk more sustainably	<p>Area, or put properties at risk of flooding?</p> <ul style="list-style-type: none"> <li>■ Provide opportunities for addressing flood risk?</li> <li>■ Promote sustainable urban drainage systems (SUDs)?</li> <li>■ Provide any opportunities for progressing more sustainable management of habitats and flood risk management in upper catchments (resolving existing problems)?</li> </ul>	
<b>Theme: Communities</b> SEA Directive Topic(s): Population and Human Health NPPF Paragraphs: 47-78			
<ul style="list-style-type: none"> <li>■ An ageing population which will result in increased pressure on local health facilities, and a higher old age dependency ratio (this is also a national issue).</li> <li>■ The decline of some rural settlements due to limited opportunities for appropriate full time employment.</li> <li>■ Need to allow opportunities for new sustainable uses for rural barns, whilst avoiding conversion to inappropriate uses.</li> <li>■ Cooperation needed where settlements adjoin or are split between Local Planning Authority areas, including Ashburton, Buckfastleigh, Cheriton Bishop and Yelverton.</li> </ul>	<b>8.</b> To maintain and enhance community and settlement identities distinctive to Dartmoor	<ul style="list-style-type: none"> <li>■ Have an effect on the identity of any communities or settlements, including those split with other Local Plan boundaries?</li> <li>■ Likely to affect rural community vitality?</li> <li>■ Likely to strengthen the role of local &amp; rural centres?</li> </ul>	Number of services/facilities available in local centres Issues highlighted within the settlement Employment opportunities
	<b>9.</b> To support the provision & accessibility of services & facilities <sup>19</sup> ?	<ul style="list-style-type: none"> <li>■ Support sufficient services &amp; facilities for existing communities &amp; new development?</li> </ul>	Key services/facilities available Creation and loss of community services/facilities

<sup>19</sup> Please note that capacity of access routes and parking is covered by SA Objective Nos 13 & 14 on transport

<ul style="list-style-type: none"> <li>■ New development should be focussed in areas that are the most sustainable and have the capacity for change.</li> </ul>			
<b>Theme: Housing</b> SEA Directive Topic(s): Population and Human Health NPPF Paragraphs: 47-78			
<ul style="list-style-type: none"> <li>■ A need for affordable housing for local and young people, and appropriate housing for older people who may be looking to downsize.</li> <li>■ Meeting the housing need for the different demographics within the National Park.</li> <li>■ A high average house price which greatly exceeds the average wage for the area, making access to the property market unattainable for many.</li> <li>■ Special circumstances for succession farm dwellings to enable people to continue to undertake traditional and sustainable farming and woodland management</li> <li>■ Increasing prevalence of second homes and holiday homes</li> </ul>	<b>10.</b> To ensure that the housing needs of all National Park residents are met	<ul style="list-style-type: none"> <li>■ Provide sufficient quality housing to meet the identified needs of all communities within the National Park?</li> <li>■ Provide an appropriate mix of types of housing, including affordable &amp; adaptable?</li> <li>■ Provide for those whose work is important to the National Park, including agricultural &amp; forestry?</li> </ul>	Proportion & type of affordable dwellings approved & constructed Mix of type of dwellings Number of empty & second homes Ratio of average house prices to average household income
<b>Theme: Health and Equalities</b> SEA Directive Topic(s): Population and Human Health NPPF Paragraphs: 69-78			
<ul style="list-style-type: none"> <li>■ Need for additional open space and play facilities in some settlements, but in the context of limited opportunities for ongoing maintenance and management funding</li> <li>■ Highlighted differences in IMD scores between different LSOAs, with some LSOAs more deprived than others.</li> </ul>	<b>11.</b> To improve the health and wellbeing of communities and reduce inequalities	<ul style="list-style-type: none"> <li>■ Have an effect that results in the loss or gain of any significant areas of Green Infrastructure, open space, leisure or recreation for people?</li> <li>■ Encourage healthy lifestyles<sup>20</sup>?</li> </ul>	Indices of Deprivation Public Open Space Provision per settlement Number of leisure facilities available Green Infrastructure categories and mapping

<sup>20</sup> Please note that encouraging healthy lifestyles through sustainable transport is addressed in the theme following on Transport & Movement

<ul style="list-style-type: none"> <li>Promoting access and use of the National Park for different ethnic groups – national issue.</li> <li>Ensuring that disabled people can access and use the National Park.</li> <li>Higher levels of fuel poverty than the national average.</li> <li>Regional differences in equality, including education and life expectancy discrepancies.</li> </ul>		<ul style="list-style-type: none"> <li>Promote access &amp; use of the National Park for different ethnic groups?</li> <li>Promote access &amp; use of the National Park for disabled people?</li> </ul>	
<b>Theme: Economy and Employment</b> SEA Directive Topic(s): Population and Human Health NPPF Paragraphs: 18-22			
<ul style="list-style-type: none"> <li>Aging population and therefore a decreasing proportion of those who are economically active – (also national issue).</li> <li>Net out-commuting for work, which may increase as peripheral towns and cities grow.</li> <li>Relatively low wages and high house prices which may deter/prohibit young workers living in the National Park.</li> <li>Almost half of businesses are small or micro, and there is a high level of self-employment, with relatively small demand for new floorspace space forecast.</li> <li>Existing employment land and business units are poor to medium quality and small scale, with limited appetite for investment or speculative builds.</li> <li>Relatively high employment in agriculture, but this is forecast to fall while other sectors (construction, businesses services, accommodation and food) are forecast to grow</li> </ul>	<b>12.</b> To promote and support the economy, especially key business sectors of tourism, agriculture, leisure/recreation and small businesses	<ul style="list-style-type: none"> <li>Promote &amp; support key areas of tourism, leisure/recreation, agriculture/forestry, or small businesses appropriate to character of Dartmoor?</li> <li>Promote flexibility, including home-working?</li> <li>Encourage the use of local products and services?</li> <li>Maintain progress with faster broadband &amp; mobile technologies appropriate for the character of the National Park?</li> </ul>	VAT registrations Business turnover & number of employees Number of claimants on job seekers allowance Proportion of working age population in full-time employment Broadband access

<ul style="list-style-type: none"> <li>20-30% of employment is in tourism, with large-scale expenditure in the local economy by tourists</li> <li>Tourism is dominated by day visitors, although the number of staying visitors is growing suggesting an opportunity to expand and realise greater benefits</li> <li>Much of the economy depends on the quality of the natural and built environment, and overall natural capital, through encouraging tourism, visitors, and location of businesses.</li> </ul>			
<b>Theme: Transport and Movement; Air Quality<sup>21</sup></b> SEA Directive Topic(s): Population and Human Health NPPF Paragraphs: 29-41			
<ul style="list-style-type: none"> <li>High dependence on private vehicle use and poor and infrequent public transport services – a common feature in rural Devon</li> <li>Risk of congesting road network in vicinity of new major developments on outskirts of National Park area</li> <li>The availability of parking is an identified issue in several settlements in the National Park.</li> <li>Road transport is one of the main sources of nitrogen oxides for the National Park. [Please note that flooding is dealt with separately under the Water: Resources, Quality and Flooding topic]</li> </ul>	<b>13.</b> To help reduce congestion, particularly on the outskirts of National Park, and reduce associated indirect impacts on air quality and greenhouse gas emissions	<ul style="list-style-type: none"> <li>Help in reducing identified congestion?</li> <li>Exacerbate existing parking issues?</li> <li>Result in an increase in congestion with a negative effect on air quality?</li> </ul>	Incidences of congestion AQMA designations- reason and location
<ul style="list-style-type: none"> <li>Ensuring that new development is in accessible locations that minimises the need to travel by private vehicle</li> </ul>	<b>14.</b> To encourage a change to sustainable transport	<ul style="list-style-type: none"> <li>Improve access to, and quality of, sustainable transport modes?</li> </ul>	Public transport routes & use PRoWs

<sup>21</sup> Given the close relationship between traffic and air quality, it is not considered necessary to have a separate SA Objective specifically relating to air quality.

<ul style="list-style-type: none"> <li>Promoting sustainable transport in the National Park, improving existing public transport &amp; supporting cycling and walking routes.</li> <li>Reduce levels of atmospheric pollution, specifically NO<sub>2</sub> emissions.</li> <li>Promote working from home for rural communities to help ease congestion on busy A roads.</li> <li>Invest in Public Rights of Way (PRoW) network to address declining number of PRoW that are categorised as in 'easy to use' condition.</li> </ul>	<p>modes and to reduce the need to travel</p>	<ul style="list-style-type: none"> <li>Provide opportunities to enhance the cycling &amp; footpath network?</li> <li>Encourage a reduction in the need to travel by car</li> </ul>	<p>Increase in cycleways &amp; footpaths PRoW which are 'easy' to use</p>
<p><b>Theme: Energy &amp; Climate Change</b> SEA Directive Topic(s): Climatic Factors NPPF Paragraphs: 93-104</p>			
<ul style="list-style-type: none"> <li>Reducing energy consumption, with a focus on transport which accounts for almost 50% of the National Park's energy consumption.</li> <li>Increasing the energy efficiency of older dwellings, and ensuring new buildings have high energy efficiency standards.</li> <li>Promoting sustainable transport such as walking, cycling and public transport.</li> <li>Mitigating against Climate Change effects, including flood risk and damage to local habitats and wildlife.</li> <li>Adapting to the effects of Climate Change through appropriate design, appropriate siting of development, and considering the availability of water resources.</li> <li>Constraints of national standards for energy whilst the National Park may wish to promote higher sustainability standards.</li> </ul>	<p>The promotion of public transport and the reduction of private vehicle use is addressed in SA Objective No 12 Transport &amp; Movement.</p> <p>Improving energy efficiency in development is addressed in SA Objective No 1 Landscape &amp; Settlement Character.</p> <p>Flood risk &amp; climate change mitigation is considered in the SA Objectives Nos 6 &amp; 7 Water – Resources &amp; Quality; Flooding.</p>		

<b>Theme: Waste</b> SEA Directive Topic(s): Material Assets NPPF Paragraphs: 5, 142-149			
<ul style="list-style-type: none"> <li>Promote recycling, reuse and composting to improve sustainable waste management.</li> <li>Ensure new developments have appropriate storage for recycling boxes/bins.</li> <li>Avoid inappropriate waste management or waste disposal facilities in the National Park</li> </ul>	<b>15.</b> To reduce waste & promote reuse and recycling	<ul style="list-style-type: none"> <li>Reduce waste?</li> <li>Promote reuse, recycling or composting?</li> </ul>	% waste reused/recycled

**Table 2.3: Sites SA Framework**

SA Objectives	Decision-Aiding Questions Are the proposals in the Plan likely to...?	Evidence	Thresholds of Significance for Likely Effects from Development Site Options	
<b>Theme: Landscape and Settlement Character</b> SEA Directive Topic(s): Landscape NPPF Paragraphs: 109-125				
<b>1.</b> To conserve and enhance the landscape and settlement character of Dartmoor National Park	<ul style="list-style-type: none"><li>Have an effect on the special landscapes, valued attributes townscapes &amp; their settings?</li><li>Reduce the impacts of large structures &amp; development that are visible from or within the National Park?</li><li>Reduce the adverse effects of agricultural change (land use change, equestrian use, building conversions) on the landscape?</li><li>Contribute to the wild, remote &amp; tranquil characteristics of Dartmoor, including minimising light and noise pollution?</li></ul>	<ul style="list-style-type: none"><li>Landscape Sensitivity Study (2017)</li><li>Magic Map</li><li>Landscape Character Assessment (2017)</li><li>Parish Profiles (2017)</li><li>DNPA GIS layers</li></ul>	++	Development will restore and enhance currently degraded landscapes or Valued Attributes, and/or address an existing settlement character issue, with a major positive effect.
			+	Development will increase tranquillity, reduce light pollution, will positively enhance the landscape. Development will positively contribute to the existing character of the settlement.
			0	Development will not enhance or degrade the landscape of the National Park or the settlement character/townscape, with a residual neutral effect.
			?	There is some uncertainty about the potential effect of development on the landscape/townscape; gaps in information.
			-	Development has the potential to effect Valued Attributes of the landscape, reduce tranquillity, increase light pollution, create large create large intrusive structures and/or the site option has the potential to negatively affect the settlement character, with mitigation possible.
		--	Development has the potential to result in the loss of key landscape features, reduce tranquillity, increase light pollution, create large intrusive structures and/or the site	

				option will degrade the settlement character, with mitigation difficult and/or expensive
<b>2.</b> To conserve & enhance the character, safety, accessibility, adaptability, and sustainability, including energy efficiency, of the built environment by raising the quality of design and construction	<ul style="list-style-type: none"><li>■ Encourage the use of local and traditional building materials?</li><li>■ Promote a high standard of quality in design, construction &amp; operation to promote sustainable management of resources<sup>22</sup></li><li>■ Enhance the distinctiveness &amp; diversity of the local built environment and community spaces?</li><li>■ Promote a high standard of access and adaptability?</li></ul>	<i>This topic has been scoped out of the SA site assessments as all site options have the potential to provide sustainable design and energy efficiency in accordance with draft DNPA Policies and the Design Guidance.</i>		
<b>Theme: Biodiversity, Geodiversity and Green Infrastructure</b> SEA Directive Topic(s): Biodiversity, Flora and Fauna NPPF Paragraphs: 109-125				
<b>3.</b> To protect, enhance and manage biodiversity & geodiversity for net gain, where possible	<ul style="list-style-type: none"><li>■ Have any effects on internationally or nationally designated biodiversity or geodiversity?</li><li>■ Have any effects on local biodiversity or geodiversity?</li><li>■ Contribute to enhancement of the</li></ul>	<ul style="list-style-type: none"><li>■ Magic Map</li><li>■ DNPA GIS Layers</li><li>■ State of the Environment Paper (2017)</li><li>■ Living Dartmoor</li><li>■ South West Nature Map</li></ul>	<div><div>++</div><div></div><div>+</div><div></div></div>	<p>The site option will provide enhancements to Key Wildlife Areas and will help resolve an existing biodiversity issue/problem in the area, or will create new green infrastructure, with a major positive effect.</p> <p>No negative effect on biodiversity or geodiversity, and has the opportunity to provide enhancements to biodiversity and green infrastructure with a minor positive effect.</p>

<sup>22</sup> Please note that sustainable resources management is primarily addressed under Soils, Water, & Transport; here for design criteria this relates to attractiveness, safety & energy to avoid duplication at the SA assessment stages

	<ul style="list-style-type: none"><li>Green Infrastructure network</li><li>Contribute to enhanced understanding through provision of further studies/surveys</li><li>Enable good farming practice</li><li>Enable good woodland management</li><li>Increase nitrogen deposition on susceptible habitats?</li></ul>	<ul style="list-style-type: none"><li>Natural England Site Information</li></ul>	0	The site option will not result in negative effects on biodiversity/geodiversity but will not enhance biodiversity/geodiversity either, with a residual neutral effect.
			?	There is uncertainty on the effect of development on biodiversity or geodiversity in the area; gaps in information.
			-	The site option will have minor negative effects on locally designated biodiversity, will result in the loss or fragmentation of priority habitat and/or green infrastructure, or may disrupt species targeted for conservation; mitigation possible.
			--	The site option will negatively affect a European or nationally designated biodiversity site, with mitigation difficult or expensive.
<b>Theme: Historic Environment</b> SEA Directive Topic(s): Cultural Heritage NPPF Paragraphs: 126-141				
4. To protect, conserve, and enhance the historic environment and its setting	<ul style="list-style-type: none"><li>Protect, conserve &amp; enhance designated and non-designated heritage assets and their settings?</li><li>Conserve the character of historic environment, including historic landscapes?</li><li>Improve access to and understanding of heritage?</li><li>Provide opportunities to enhance knowledge on</li></ul>	<ul style="list-style-type: none"><li>Magic Map</li><li>DNPA GIS Layers</li><li>Historic Environment Paper (2017)</li><li>At Risk Register</li><li>Conservation Area Appraisals</li><li>Neighbourhood Plans</li><li>Google Maps</li></ul>	++	The site option will have a major positive effect on heritage assets and their settings; will help resolve an existing issue/problem in the area.
			+	Development may improve access to heritage assets and/or may enhance heritage assets such as a Listed Building; provides additional survey information.
			0	Development will not negatively or positively affect any heritage assets, with a residual neutral effect.
	?	There is uncertainty to the effect of development on designated or undesignated heritage features; gaps in information.		

	the archaeological resource?		-	Development has the potential for a minor negative effect on a Listed Building, Conservation Area, Scheduled Monument, Premier Archaeological Landscapes (PAL) or undesignated heritage assets; mitigation possible.
			--	The site option has the potential for a major negative effect on a Listed Building/ Conservation Area, Scheduled Monument, PAL; mitigation difficult or expensive.
<b>Theme: Soils, Land &amp; Minerals</b> SEA Directive Topic(s): Soil NPPF Paragraphs: 79-92, 109-125				
<b>5.</b> To protect and conserve soil, land and minerals	<ul style="list-style-type: none"> <li>Result in the loss of soils and agricultural land?</li> <li>Make the best use of brownfield land?</li> <li>Promote sustainable mineral extraction?</li> <li>Protect future mineral resources?</li> <li>Minimise the risk of contaminating soils?</li> </ul>	<ul style="list-style-type: none"> <li>Magic Map</li> <li>DNPA GIS Layers</li> <li>Google Maps</li> <li>Dartmoor Minerals Paper (2017)</li> <li>Landscape Character Study (2017)</li> </ul>	++	The site option is entirely brownfield land and includes no greenfield land.
			+	The site option is partially brownfield land.
			0	No negative or positive effect on soils, overall neutral effect.
			?	There is uncertainty as to the effect of the site option on soils; gaps in information.
			-	The site option will result in the loss of agricultural land and/or is partially within a mineral safeguarded area. Potential for minor negative effect.
			--	The site option will result in the loss of agricultural land and is entirely within a mineral safeguarded area, with a residual major negative effect.

<b>Theme: Water - Resources, Quality and Flooding</b> SEA Directive Topic(s): Water NPPF Paragraphs: 99-125				
<b>6.</b> To promote efficient water use and improve water quality	<ul style="list-style-type: none"> <li>Promote sustainable water management and water use efficiencies?</li> <li>Result in any loss of quality or quantity that could affect WFD objectives for good ecological status?</li> </ul>	<ul style="list-style-type: none"> <li>Magic Map</li> <li>DNPA GIS Layers</li> <li>South West River Basin Management Plan</li> <li>Environment Agency Online Maps</li> <li>Catchment Data Explorer</li> </ul>	++	Not Applicable
			+	There is the potential for minor positive effect on the status of waterbodies.
			0	The site option will not negatively affect the status of waterbodies with a residual neutral effect.
			?	There is uncertainty with regards to the effect of the site option on the water environment; gaps in information.
			-	The site option will have a minor negative effect on the chemical or ecological status of a water body; and/or is within a designated water protection zone mitigation possible.
			--	Not Applicable
<b>7.</b> To reduce the risk of flooding from all sources and manage flood risk more sustainably	<ul style="list-style-type: none"> <li>Propose development in a flood zone, Critical Drainage Area, or put properties at risk of flooding?</li> <li>Provide opportunities for addressing flood risk?</li> <li>Promote sustainable urban drainage systems (SUDs)?</li> <li>Provide any opportunities for progressing more</li> </ul>	<ul style="list-style-type: none"> <li>DNPA GIS Layers</li> <li>Environment Agency Online Flood Zone Maps</li> <li>DNPA Strategic Flood Risk Assessment</li> </ul>	++	The site option can contribute to the reduction of flood risk in the local area, helping resolve and existing problem; possibilities for SUDs and/or upper catchment habitats for flood risk mitigation.
			+	Potential for the site option to accommodate SUDs, with a minor positive effect.
			0	The site option is not located in a flood zone and will not contribute to alleviating flood risk, with a neutral effect.

	sustainable management of habitats and flood risk management in upper catchments (resolving existing problems)?		?	There is some uncertainty as to the effect of the site option on flooding; gaps in information.
			-	The site option is partially located within a flood zone (2-3) or a Critical Drainage Area; however, mitigation may be possible through development avoiding this part of the site.
			--	Site option is entirely located within a designated flood zone, with a major negative effect.
<b>Theme: Communities</b> SEA Directive Topic(s): Population and Human Health NPPF Paragraphs: 47-78				
8. To maintain and enhance community and settlement identities	<ul style="list-style-type: none"><li>Have an effect on the identity of any communities or settlements, including those split with other Local Plan boundaries?</li><li>Likely to affect rural community vitality?</li><li>Likely to strengthen the role of local &amp; rural centres?</li></ul>	<ul style="list-style-type: none"><li>Google Maps</li><li>Neighbourhood Plans</li><li>Parish Profiles</li><li>Parish Workshops &amp; Meetings</li></ul>	++	There is identified community support for new development and development will strengthen the role of the Local Centres or rural vitality
			+	The site option has the potential to strengthen the role of Local Centres & rural vitality, and will have a positive effect on the settlements identity and/or community
			0	The site option will have no negative or positive effects on the local community, overall neutral effect.
			?	There is some uncertainty as to the effect of the site option on the community and settlement identity.
			-	The site option would have a minor negative effect on the settlement's identity and/or community.
			--	The site option would have a major negative effect on the settlement's identity and/or community.

9. To support the provision & accessibility of services & facilities <sup>23</sup>	■ Support sufficient services & facilities for existing communities & new development?	■ Google Maps ■ Neighbourhood Plans ■ Parish Profiles	++	Development could help improve services & facilities resolving an existing sustainability issue or problem.
			+	Development could help maintain current services & facilities by supporting vitality of Local Centres, and/or the site option has good access to a range of services/facilities
			0	A neutral effect is not considered possible
			?	There is some uncertainty as to the effect of the site option on local services/facilities.
			-	The site option has no access to services/facilities, or there are limited services/facilities in the settlement
	--	The site option does not have access to any services/facilities and will have a negative effect on the local services/facilities		
Theme: Housing				
SEA Directive Topic(s): Population and Human Health				
NPPF Paragraphs: 47-78				
10. To ensure that the housing needs of all National Park residents are met	■ Provide sufficient quality housing to meet the identified needs of all communities within the National Park?  ■ Provide an appropriate mix of types of housing, including affordable & adaptable?	■ OAN ■ LAA ■ Paper (2017)	++	Site option will provide housing to meet the needs of all in the National Park, including affordable, adaptable & for key workers
			+	Provides housing but not necessarily for all
			0	Site option is providing employment land with no housing identified, with a residual neutral effect.
		?	Not Applicable	

<sup>23</sup> Please note that capacity of access routes and parking is covered by SA Objective Nos 13 & 14 on transport

	<ul style="list-style-type: none"> <li>Provide for those whose work is important to the National Park, including agricultural &amp; forestry?</li> </ul>		-	Not Applicable
			--	Not Applicable
<b>Theme: Health and Equalities</b> SEA Directive Topic(s): Population and Human Health NPPF Paragraphs: 69-78				
<b>11.</b> To improve the health and wellbeing of communities and reduce inequalities	<ul style="list-style-type: none"> <li>Have an effect that results in the loss or gain of any significant areas of Green Infrastructure, open space, leisure, or recreation for people?</li> <li>Encourage healthy lifestyles<sup>24</sup>?</li> <li>Promote access &amp; use of the National Park for different ethnic groups?</li> <li>Promote access &amp; use of the National Park for disabled people?</li> </ul>	<ul style="list-style-type: none"> <li>Indices of Deprivation</li> <li>Open Space, Sport and Recreation Study</li> <li>Parish Profiles</li> <li>DNPA GIS Layers</li> <li>Magic Map</li> <li>Google Maps</li> </ul>	++	The site option will provide new areas of green infrastructure and/or public open space, and/or help sustain a local health centre- with a major positive effect.
			+	The site option will enhance existing green infrastructure and/or has good access to public open space and may promote better access to existing green infrastructure and public open space.
			0	There will be no loss or enhancement of green infrastructure or public open space.
			?	There is uncertainty around the effect of the site option on public open space and green infrastructure; gaps in information.
			-	The site option is located in an area with no easily accessible green infrastructure or public open space facilities.
			--	There will be a loss of Public Open Space or leisure/recreation facilities where there is already an existing deficit identified for major effects.

<sup>24</sup> Please note that encouraging healthy lifestyles through sustainable transport is addressed in the theme following on Transport & Movement

Theme: Economy and Employment				
SEA Directive Topic(s): Population and Human Health				
NPPF Paragraphs: 18-22				
12. To promote & support the economy, especially key business sectors of tourism, agriculture, leisure/recreation & small businesses	<ul style="list-style-type: none"><li>Promote &amp; support key areas of tourism, leisure/recreation, agriculture/forestry, or small businesses appropriate to character of Dartmoor?</li><li>Promote flexibility, including home-working?</li><li>Encourage the use of local products and services?</li><li>Maintain progress with faster broadband &amp; mobile technologies appropriate for the character of the National Park?</li></ul>	<ul style="list-style-type: none"><li>Employment Land Review</li><li>Economic Development Needs Assessment</li><li>Parish Profiles</li><li>Neighbourhood Plans</li></ul>	++	The site option will provide new, or safeguard existing, employment land that will support a key area of the economy on Dartmoor.
			+	The site option will provide new, or safeguard, employment land.
			0	The site option is not proposing any employment land and will not result in the loss of employment land.
			?	There is uncertainty as to the effect of the site option on employment; gaps in information.
			-	The site option will result in the loss of employment land.
			--	N/A
Theme: Transport and Movement; Air Quality <sup>25</sup>				
SEA Directive Topic(s): Population and Human Health				
NPPF Paragraphs: 29-41				
13. To help reduce congestion, particularly on outskirts of the National Park, and reduce associated indirect impacts on air quality and	<ul style="list-style-type: none"><li>Help in reducing identified congestion?</li><li>Exacerbate existing parking issues?</li><li>Result in an increase in congestion with a</li></ul>	<ul style="list-style-type: none"><li>Google Maps</li><li>Devon and Torbay Local Transport Plan (2014)</li><li>Magic Map</li><li>AQMA Boundary Map</li></ul>	++	The site option will actively reduce traffic in an area with identified congestion issues and/or provide additional parking, with a major positive effect.
			+	The site option will not result in an increase in traffic with a minor positive effect.
			0	

<sup>25</sup> Given the close relationship between traffic and air quality, it is not considered necessary to have a separate SA Objective specifically relating to air quality.

greenhouse gas emissions	negative effect on air quality?	<ul style="list-style-type: none"> <li>Parish Profiles</li> <li>Neighbourhood Plans</li> </ul>		The site option will have an increase in traffic however the increase will not be significant and is not in a congested area or AQMA, with a residual neutral effect.
			?	There is uncertainty with regards to the effect of the site option on congestion and air quality; gaps in information.
			-	The site option will result in an increase in traffic in an area with identified congestion issues and/or may have an urbanising effect on the rural character of local roads.
			--	The site option will significantly increase traffic in a congested area and/or a nearby AQMA, and will exacerbate an existing parking issue within the settlement, with a major negative effect.
<b>14.</b> To encourage a change to sustainable transport modes and to reduce the need to travel	<ul style="list-style-type: none"> <li>Improve access to, and quality of, sustainable transport modes?</li> <li>Provide opportunities to enhance the cycling &amp; footpath network?</li> <li>Encourage a reduction in the need to travel by car?</li> </ul>	<ul style="list-style-type: none"> <li>Google Maps</li> <li>Devon and Torbay Local Transport Plan (2014)</li> <li>Bus Timetables</li> <li>Magic Map</li> <li>Parish Profiles</li> <li>Neighbourhood Plans</li> </ul>	++	The site option has good access to footpaths, sustainable transport links, the PRow network and cycle routes, and public transport services run regularly throughout the year.
			+	The site option has good access to either footpaths, sustainable transport links, the PRow network or cycle routes.
			0	Not Applicable
			?	There is uncertainty with regards to the effect of the site option on sustainable transport.
			-	The site has poor access to footpaths, sustainable transport links, the PRow network or cycle routes, and the public transport links are infrequent.

			--	The site option has no access to footpaths, sustainable transport links, the PRoW network or cycle routes.
<b>Theme: Waste</b> SEA Directive Topic(s): Material Assets NPPF Paragraphs: 5, 142-149				
<b>15.</b> To reduce waste & promote reuse and recycling	<ul style="list-style-type: none"> <li>■ Reduce waste?</li> <li>■ Promote reuse, recycling or composting?</li> </ul>			This topic has been scoped out of the SA site assessments as all site options have the potential to provide sustainable design and waste management – as guided by other core policies.

## Appraising the Dartmoor Local Plan

- 2.9 Each emerging element of the Dartmoor Local Plan was appraised against the SA Frameworks of Objectives using professional judgment supported by the baseline and wider Plan evidence base. The nature of the likely sustainability effects (including major/minor, positive/negative, duration (short, medium or long term), permanent/ temporary, secondary<sup>26</sup>, cumulative<sup>27</sup> and synergistic<sup>28</sup>) were described in the appraisal commentary, together with any assumptions or uncertainties. Where necessary, the SA made suggestions and recommendations to mitigate negative effects or promote opportunities for enhancement of positive or neutral effects. A summary appraisal commentary reported any significant effects identified with suggestions for mitigation or enhancement to be made where relevant, and likely residual effects. SA 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, particularly at a strategic level of assessment.
- 2.10 The draft Vision for the Plan was appraised using a compatibility analysis with the SA Objectives and the findings reported in Section 5 of the Initial SA Report (December 2017) and this SA Report, with details in Appendix III.
- 2.11 The SA was used in an iterative and ongoing way to help identify and refine reasonable strategic alternatives for the plan-making. At the strategic level of assessment, there is more uncertainty as details may depend upon lower level studies and options are less locationally specific. The Strategic SA Framework was used with commentary and including comparative analysis, where possible, for the four options tested for the proposed approach to the Spatial Strategy for the Dartmoor Local Plan – and as detailed in this SA Report at Appendix IV.
- 2.12 The site options were tested using the Sites SA Framework with details presented in Appendix V. The emerging Policies were appraised using the Strategic SA Framework and by sustainability theme:
- Landscape & Settlement Character
  - Biodiversity, Geodiversity & Green Infrastructure
  - Historic Environment
  - Soils, Land & Minerals
  - Water – Resources, Quality & Flooding
  - Communities
  - Housing
  - Health & Equalities
  - Economy & Employment

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<sup>26</sup> Any aspect of a plan that may have an impact (positive or negative), but that is not a direct result of the proposed plan.

<sup>27</sup> Incremental effects resulting from a combination of two or more individual effects, or from an interaction between individual effects – which may lead to a synergistic effect (i.e. greater than the sum of individual effects), or any progressive effect likely to emerge over time.

<sup>28</sup> These arise from the interaction of a number of impacts so that their combined effects are greater than the sum of their individual impacts.

- Transport & Movement; Air Quality
- Energy & Climate Change
- Waste

- 2.13 The SA is structured under these topic headings that have been linked to Objectives in the SA Framework as well as topics in the SEA Directive and paragraphs in the NPPF. This provides a robust framework and structure to evaluate the likely significant effects of the emerging Plan against these key factors. The appraisal under each topic considered the potential effects of the relevant policies against the objectives as well as the interrelationships between topics and cumulative effects of the Plan as a whole (and as required by SEA Regulations). This also avoids duplication as many factors are inter-related.
- 2.14 SA is an assessment tool that helps to inform decision-making; it is not the only basis for deciding the preferred approach and options for the Plan. The DNPA will consider the findings of the SA alongside the wider evidence base to inform decision-making in relation to the selection or rejection of alternatives and development of policy for the Local Plan. SA is an iterative and ongoing process that will be undertaken at each stage of plan-making. SA Reports accompany the Local Plan on consultation at various stages and set out the findings of the SA, as well as reasons for the selection or rejection of alternatives in plan-making.

### **Consultation**

- 2.15 The SEA Directive and Regulations require early and effective public consultation. The development of the Dartmoor Local Plan has been subject to wide consultation since early 2016. The SA Scoping Report was subject to consultation during August-September 2017, and including formal consultation with the SEA statutory bodies (Historic England, the Environment Agency, and Natural England). The Initial SA Report (December 2017) and SA Report (October 2018) was made available on the DNPA website.
- 2.16 This method for consultation will continue with SA Reports being made available on the DNPA website for the public to comment on if they wish, and formal consultation with the statutory consultees. Any comments made will be taken into consideration and reported in the next stages of plan-making and SA/SEA. This Pre-Submission SA Report accompanies the draft Dartmoor Local Plan 2020-2036 on Regulation 19 consultation.

### 3.0 SUSTAINABILITY CONTEXT, OBJECTIVES & BASELINE CHARACTERISTICS

#### Introduction

- 3.1 In order to establish a clear scope for the SA of the Dartmoor Local Plan, it is necessary and a requirement of SEA, to review and develop an understanding of the baseline characteristics and conditions of the plan area and the wider range of plans and programmes that are relevant to the plan. The SA Scoping Report (October 2017) considered and reported baseline conditions for the plan area, as well as Plans and Programmes that may affect or be affected the development proposed in the Dartmoor Local Plan. Analysis of this information allowed the SA to identify the key issues and opportunities for sustainable development in the Dartmoor area and create sustainability objectives to address these key issues. Full details can be found in the final Scoping Report and are summarised in this section.

#### Review of Plans and Programmes (PPs)

- 3.2 Plans, programmes and projects were considered to identify the key relevant objectives and sustainability/environmental considerations with likely implications for the plan preparation during scoping, and updated as relevant and as follows:

##### National:

- DCLG, National Planning Policy Framework (NPPF), 2018
- English National Parks and the Broads- UK Government Vision and Circular (2010)
- 8-Point Plan for England's National Parks (2016)
- Rural Development Programme for England (2015)
- Environment Agency, Managing Water Abstraction (2013)
- The Heritage Alliance, Heritage 2020
- Defra, Waste Management Plan for England (2013)
- Infrastructure and Projects Authority, National Infrastructure Delivery Plan 2016 – 2021
- Natural Environment White Paper (2011, implementation update 2014)
- UK National Ecosystem Assessment (2011)
- Defra, Biodiversity 2020 - A strategy for England's wildlife and ecosystem services (2011)
- Natural Capital Committee- Fourth state of Natural Capital Report (2017)
- Public Health England Strategic Plan, Better outcomes for 2020 (2016)-
- Air Pollution Strategy (2017)
- Defra Clean Air Strategy (2019)
- Defra A Green Future: Our 25 Year Plan to Improve the Environment (2018)

##### Regional

- South West Water Resource Management Plan (2014)
- South West Water Drought Plan (2013)

- West Devon Strategic Flood Risk Assessment (2014)
- South Devon Catchment Flood Management Plan (2009)
- South West River Basin Management Plan (2015)
- Heart of the South West Strategic Economic Plan (2014)
- Devon & Torbay Local Transport Plan 3, 2011-2026
- Devon Council- A Strategy for Growth, 2013-2020
- Devon Joint Health & Wellbeing Strategy, 2016-2019
- Devon County Council Green Infrastructure Strategy (2011)
- West Devon Green Infrastructure Framework (2015)
- South Hams Green Infrastructure Framework (2015)
- Teignbridge Green Space Strategy (2009)
- South Hams and West Devon Playing Pitch Strategy (2015)
- Mid Devon Open Space & Play Area Strategy (2014)
- Devon Minerals Plan (2017)
- Devon Waste Plan (2014)

**Local:**

- Dartmoor National Park Management Plan (2014-2019)
- Dartmoor National Park Authority Business Plan (2017-2018)
- Living Dartmoor (2013)
- Dartmoor Forestry Plan (2016)
- Dartmoor Minerals Plan (2004)
- Dartmoor Open Space, Sport & Recreation Study (2011)
- Recreation and Access Strategy for Dartmoor (2011-2017)
- Greater Dartmoor Local Enterprise Action Fund (2015-2020)

**Other Development Plans:**

- North Devon & Torridge Local Plan (Adopted Oct 2018)
- Cornwall Local Plan (Adopted 2016)
- Plymouth & South West Devon Joint Local Plan to 2034 (– adopted March 2019)
- Teignbridge Local Plan (Adopted 2014)
- Mid Devon Local Plan Review (submitted in March 2018 for examination with main hearings in February 2019)
- Torbay Local Plan (Adopted 2015)
- East Devon Local Plan (Adopted 2016)
- Exeter City Local Plan (Adopted 2012)
- Greater Exeter Strategic Plan to 2040 (draft GSEP anticipated for November 2019 with publication version anticipated in 2021)

- 3.3 National Parks have specific planning policy at a national level. Within the NPPF, it is specified that '*great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks*'<sup>29</sup>. The NPPF also states that wildlife conservation and cultural heritage within National Parks are also important' and should be given great weight due to their importance to the National Parks. As far as is practicable, the maintenance of landbanks of non-energy minerals should be provided from outside National Parks (paragraph 205a). Furthermore, the government has recognised that National Parks are not appropriate locations for unrestricted housing growth,

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<sup>29</sup> MHCLG (2018) National planning Policy Framework (paragraph 172)

and therefore general housing targets are not provided for National Park Authorities<sup>30</sup>.

- 3.4 Plans and policies aiming to protect, enhance and manage biodiversity, landscape character, and the historic environment are all key for Dartmoor. Plans relating to the water environment are also key, as the many rivers and streams which flow from Dartmoor are an integral part of the environment for the National Park. Objectives relating to Green Infrastructure and recreation are very relevant, as the Local Plan can address shortfalls in Green Infrastructure or Public Open Space, meeting the second purpose of the National Park to promote understanding and enjoyment of the National Park. The Local Plan can also ensure development has sufficient access to promote healthier lifestyles.
- 3.5 The district authority areas surrounding the National Park all have Local Plans in various stages, and are also working together - the Greater Exeter Strategic Plan<sup>31</sup> (GSEP to the year 2040, East Devon, Exeter, Mid Devon & Teignbridge, & Devon County Councils at early drafting stages); and the Plymouth & South West Devon Joint Local Plan<sup>32</sup> (to the year 2034, adopted March 2019). The Park is located wholly within Devon County, and is split between Teignbridge, South Hams and West Devon Councils with a small part of Mid Devon Council.
- 3.6 As nearby Local Plans are prepared, DNPA is working with those Authorities through the Duty to Co-operate to agree how the needs arising from the National Park will be addressed, recognising the level of constraint and policy position of the National Park. Plymouth, Torbay and Exeter Councils are nearby with responsibility for significant growth areas that will have important implications for the National Park. A Duty to Co-operate Scoping Report<sup>33</sup> has been prepared by DNPA in 2017. Development growth outlined in the surrounding Local Plans will likely result in increased pressures on the National Park. The SA Scoping Report identified that growth in the surrounding areas is likely to result in a range of different pressures that will affect the National Park – recreation, light pollution, traffic/movement, noise & tranquillity, air quality, and landscape/visual amenity.

## Summary Baseline Character & Conditions

- 3.7 **Landscape & Settlement Character:** The area was designated as a National Park in 1951 due to its natural landscape, wildlife and historical features<sup>34</sup>. Partially bordering the National Park to the west is the Tamar Valley Area of Outstanding Natural Beauty (AONB), and to the south there is South Devon AONB, which at its nearest point is approximately 2km south of the National Park<sup>35</sup>. The Dartmoor NCA is characterised by extensive upland moorland, overlaid with peat deposits and supports internationally important blanket

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<sup>30</sup> DEFRA (2010) English National Parks and the Broads: UK Government Vision and Circular 2020

<sup>31</sup> <https://www.gesp.org.uk/>

<sup>32</sup> <https://plymswdevonplan.co.uk/news>

<sup>33</sup> DNPA (2017) Duty to Co-operate Scoping Report

<sup>34</sup> <http://www.nationalparks.gov.uk/>

<sup>35</sup> Magic Map (2017)

bogs. The peat and bogs are important for carbon storage, and for absorbing and releasing large amounts of water. Deep-cut valleys steeped in woodland with rivers are a notable landscape feature, as are the skylines, ridges and distinct granite tors. A large amount of the National Park land is used for the grazing of cattle, sheep and ponies which has helped shape the NCA. Associated farmsteads, pastoral fields and hedgebanks are a key part of the landscape<sup>36</sup>. The National Park is considered to have a high level of tranquillity, and dark night skies<sup>37</sup>, although the area is not currently designated as a Dark Sky Reserve. The built environment of Dartmoor is largely limited to small settlements, individual farmsteads and individual dwellings, together with an extensive array of historical features. The vernacular design is a key part of the Dartmoor townscape and settlement characters vary between those on the High Moor and those on the periphery of the National Park.

- 3.8 **Biodiversity, Geodiversity & Green Infrastructure:** Within Dartmoor National Park there are three European designated Special Areas of Conservation (SACs); Dartmoor SAC, South Dartmoor Woods SAC and South Hams SAC<sup>38</sup>. The North Devon Biosphere Reserve encompasses most of North Devon and a small area in the north of the National Park. The reserve is designated due to the special landscape and wildlife areas, heritage assets and communities who value sustainability. There are also EU designated sites outside of the Park but within Devon. Some 28% of the Park is designated as Sites of Special Scientific Interest (SSSI)<sup>39</sup> and it contains locally designated biodiversity sites, which includes 232 County Wildlife Sites (CWS)<sup>40</sup>.
- 3.9 Dartmoor contains a selection of Strategic Nature Areas (SNAs) that identify areas for maintenance and potential expansion of Priority Habitat, as shown on the South West Nature Map<sup>41</sup>; Key Wildlife Areas (KWA) have been identified. It is important to recognise that whilst there are a wide range of designations regarding biodiversity in the National Park, it cannot be assumed that these comprise all the significant biodiversity on Dartmoor. Dartmoor has an important role to play for Green Infrastructure (GI) of Devon and the South West as a whole. Due to the presence of a variety of habitats, open spaces and recreation areas, and several large rivers and many smaller streams, green and blue networks can be found across the moor. Visitors, recreational use, and farming practices can all have detrimental effects on key habitats and wildlife.
- 3.10 **Historic Environment:** 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. Although there are thousands of designated heritage assets within the National Park, it should be noted that not all the archaeological and historic features on Dartmoor are designated. Many of these historical features are

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<sup>36</sup> Natural England (2014) Dartmoor National Character Area Profile

<sup>37</sup> Ibid.

<sup>38</sup> Magic Map (2017)

<sup>39</sup> DNPA (2017) State of the Park Report

<sup>40</sup> DNPA (2017) State of the Park Report

<sup>41</sup> <http://www.biodiversitysouthwest.org.uk/nmap.html>

integral parts of the landscape, and may have local significance to communities and individuals; also, many contribute significantly to the character of the places.

- 3.11 **Soils, Land & Minerals:** The granite on Dartmoor has been quarried for centuries and mining has also been a feature of Dartmoor landscape, with the resources of tin, copper, and lead. There are no working mines now but the small number of quarries provide local employment. There are Mineral Safeguarded Areas (MSA), which are designated to prevent development from sterilising potentially economically viable mineral resources. 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, with some Grade 3 (sub-grade not known) on the edges of the National Park<sup>42</sup>. Due to the poor soil quality, horticulture, arable farming and dairy farming are constrained to small areas within the National Park<sup>43</sup>. However, the soil resources of Dartmoor are still important, for non-intensive grazing and biodiversity.
- 3.12 **Water – Resources, Quality & Flooding:** Dartmoor is considered to be a major water catchment in the south west, with a network of streams and mires on the high moor feeding into fast flowing rivers. Much of Devon including the city of Plymouth<sup>44</sup>, has its water supplied from Dartmoor. The South West Water Resources Management Plan (WRMP) predicts there will be a surplus of water in the supply zone up until 2040, and therefore no new infrastructure will be required for the WRMP period<sup>45</sup>. As regards water quality and the requirements of the EU Water Framework Directive (WFD), Dartmoor is within the South West River Basin District, and the National Park is within 3 different Management Catchment Areas; North Devon, South Devon and Tamar<sup>46</sup>. Most waterbodies in the Park are good – moderate ecological status, with only one failed. The chemical and ecological status of waterbodies on Dartmoor is mainly affected by pollution from agricultural runoff<sup>47</sup>. It is assumed that sewage is collected and treated through rural sewage treatment works and localised septic tanks but no details have been found and this is identified as a potential information gap.
- 3.13 Areas of medium to high flood risk (Zones 2-3) are largely located in steep sided valleys. There are 2 Critical Drainage Areas (CDA)<sup>48</sup> within Dartmoor, one is located in Ashburton, and the other is part of the Tavistock CDA. There are also CDAs bordering the National Park in Okehampton to the north and at Ivybridge to the south. Settlements where people and property are at greatest risk are in the Local Centres of Ashburton, Buckfastleigh, and Horrabridge. Smaller settlements within the study area, such as South Zeal, Cornwood, Sticklepath, Walkhampton, Lustleigh and North Bovey are likely to have similar flooding issues<sup>49</sup>. More sustainable flood risk management

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<sup>42</sup> Natural England (2014) Dartmoor National Character Area Profile

<sup>43</sup> <http://www.dartmoor.gov.uk/wildlife-and-heritage/heritage/farming>

<sup>44</sup> Natural England (2014) Dartmoor National Character Area Profile

<sup>45</sup> South West Water (2014) Water Resources Management Plan

<sup>46</sup> <http://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/8>

<sup>47</sup> Environment Agency Data Catchment Explorer

<sup>48</sup> <https://new.devon.gov.uk/floodriskmanagement/planning-and-development/>

<sup>49</sup> Scott Wilson for DNPA (2010) Level 1 Strategic Flood Risk Assessment

includes provision/maintenance of habitats and land use higher up the catchments thus helping to attenuate surfacewater run-off and flood risk lower down the catchment. There has been some progress in this respect on Dartmoor<sup>50 51</sup> but the underlying geology and associated land use may limit further possibilities.

- 3.14 **Communities:** Dartmoor has a population of around 34,000 residents who live within the National Park boundaries<sup>52</sup>. The population is considered to be stable, with no significant increase or decrease occurring since 2001. The Park has a higher old age dependency ratio (OAD) than the national average, which creates issues for Dartmoor<sup>53</sup>. This includes providing adaptable suitable accommodation for elderly residents, an increase in pressure on local health services, and the accessibility issues for older residents which may require additional public transport services. 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. Some settlements are split between the National Park boundary and other Local Plans of the surrounding district authorities, especially Ashburton, Buckfastleigh, Cheriton Bishop & Yelverton. This will require careful cooperation to meet with the housing needs of different demographics.
- 3.15 **Housing:** The area is characterised by the 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. Whilst house prices on Dartmoor are increasing and 11% higher than the national average, average Devon house prices have fallen by 3% since 2012<sup>54</sup>. House prices in the National Park largely exceed average earnings. Young people, seasonal staff and part time workers, and other key workers are priced out of Dartmoor as they cannot afford accommodation. There may be special circumstances and some need for isolated new houses and the provision of succession farm dwellings on farmsteads. Enabling people to continue to farm whilst providing the highest status of protection to the landscape remains an issue for the review of the Local Plan.
- 3.16 **Health & Equalities:** Dartmoor has a lower than average Index of Multiple Deprivation (IMD) score, of 17.1 compared to the national average of 21.78<sup>55</sup>. The average life expectancy for Dartmoor is 83.2 years. Some 20% of the population in the three relevant Health Authorities is obese; child poverty in Devon as a whole has fallen since 2013. Some 10% of households in Devon suffer from fuel poverty – and this partly attributed to the lower wage

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<sup>50</sup> Dartmoor Mires Project

<sup>51</sup> Environment Agency (2012) South Devon Catchment Flood Management Plan

<sup>52</sup> Edge analytics for DNPA (2016) Dartmoor National Park Demographic Forecasts

<sup>53</sup> Edge analytics for DNPA (2016) Dartmoor National Park Demographic Forecasts

<sup>54</sup> DNPA (2017) State of the Park Report

<sup>55</sup> DNPA (2017) State of the Park Report

economy in this area of Dartmoor. Overall a number of key health statistics in Devon are below or in line with the national averages. 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. However, children's play spaces, allotments, amenity greenspace and outdoor sports facilities provision vary from settlement to settlement within the National Park<sup>56</sup>.

- 3.17 **Economy & Employment:** Dartmoor has a population of around 34,000 with 25,000 of working age. The size of the population has remained stable over the last decade<sup>57</sup>, but as in other National Parks the population is ageing and has a much older population than the national average with issues for the future. 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. The Economic Prospectus<sup>58</sup> indicates that 31% of employment is in farming, food and tourism. 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). The National Park is seen as a beneficiary for businesses located within its boundaries. There is net out commuting for work from Dartmoor for about 23% of workers. A key factor for increasing home working is broadband speed - access to superfast broadband in the National Park has improved from 50% of dwellings in 2015 to 79% (provisional) in 2017.
- 3.18 **Transport & Movement; Air Quality:** 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. East to west are the B3212 and B3357 with smaller roads providing access to settlements and dwellings across the moor. The main A roads such as the A386 do suffer from congestion as commuters travel to destinations such as Plymouth and Exeter. The main mode of transport for locals is private vehicles such as cars and vans<sup>59</sup>, with public transport being a much less used form of transport in rural areas. There is the potential for development on the outskirts of Dartmoor to result in an increase in traffic on the local road network, due to an increase in traffic as residents use the moors for recreational purposes.
- 3.19 An increase in residents working from home across Dartmoor could result in a decrease in vehicles on the roads, and a decrease in traffic. However, this is largely reliable on houses having connection to fast internet speeds for remote working. The Public Rights of Way Network (PRoW) on Dartmoor is extensive, with 733km of footpaths, bridleways and byways located across the National Park. 79% of this is considered to be 'easy to use' (relating to obstruction, interference and inconvenience), which is a decrease of 16% since 2010/11. The National Park also contains National Cycle Routes. Route 27, known as the Devon Coast to Coast, a 100-mile route.

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<sup>56</sup> DNPA (2011) Open Space, Sport & Recreation Study

<sup>57</sup> ONS (2013) 2011 Census: Characteristics of National Parks

<sup>58</sup> Dartmoor and Exmoor National Parks – Economic Prospectus 2015

<sup>59</sup> Office for National Statistics (2017) 2011 census data

- 3.20 There are no Air Quality Management Areas (AQMA)<sup>60</sup> within Dartmoor, however there are 2 AQMAs located in the surrounding area, including a small AQMA in Ivybridge and a small AQMA in Dean Prior.
- 3.21 **Energy & Climate Change:** Within the National Park transport accounts for 45% of all energy consumption, 34% is for domestic purposes and 20% for business<sup>61</sup>. Transport is the highest source of energy consumption due to the rural nature of the area. There is the potential to use different renewable energy sources within the National Park, such as wind power, solar power and hydro power. However, renewable energy developments can have negative effects on the special qualities of the National Park. Overall the climate of Dartmoor is changing, becoming warmer and wetter with a longer growing season. The changes occurring as a result of climate change will have an impact on the agricultural industry. The change in climate is also likely to affect the ecology of the National Park.
- 3.22 **Waste:** In 2014, almost 50% of waste within Dartmoor was sent to reuse, recycling or compost, which is higher than the national average<sup>62</sup>. However, improvements could be made to increase recycling rates, and to encourage less waste. During the summer months, rubbish at beauty spots has been known to become an issue as a result of increased visitor numbers. Waste management facilities should avoid National Parks and AONBs, and within these areas smaller proposals to meet local needs may be appropriate. Within the National Park these will likely be limited to sorting facilities, compost making areas, and small community operations.

### **Likely Evolution of Baseline without the Local Plan**

- 3.23 Without a Local Plan, development has the potential to result in negative effects on the landscape characteristics and biodiversity/geodiversity assets of Dartmoor. The Plan can ensure development is of a good design standard such that it is integrated well with the existing landscape and settlement character. Without the Local Plan, current health and equality issues in the National Park may be exacerbated and there could be loss of key areas of open space. Without the Plan, designated heritage assets would still be protected through national and local policy; however, undesignated heritage assets, heritage settings and potential archaeology could be more vulnerable to the impacts of development.
- 3.24 Without the Local Plan, there is likely to be a less coordinated approach to the delivery of new employment, housing and infrastructure. New development is less likely to be delivered in areas where it is needed most, which could exacerbate inequalities, and problems with housing affordability throughout the Plan area. It could adversely affect the economic viability and vitality of towns and settlements and thus not effectively meet the needs of the Park's communities.

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<sup>60</sup> <https://uk-air.defra.gov.uk/aqma/maps>

<sup>61</sup> DNPA (2014) Dartmoor National Park Management Plan

<sup>62</sup> DNPA (2014) Local Plan Annual Monitoring Report

- 3.25 New development can be planned to ensure accessibility and increase opportunities for healthy and active lifestyles. Without a Plan in place development is less likely to deliver health benefits. There would be an increased likelihood of negative effects on Green Infrastructure networks and existing facilities (for example through loss of undesignated areas or established facilities, or fragmentation of spaces).
- 3.26 The Plan can strategically plan for development in areas where the existing transport networks can accommodate development and in locations that reduce the need to travel and/or better promote sustainable transport. Without the Plan, the cumulative effects of development on biodiversity are unlikely to be addressed and the national aim of no net loss is less likely to be achieved through a lack of coordinated planning of development, with missed opportunities to improve habitat connectivity.
- 3.27 The Local Plan can also be used to promote sustainable transport on Dartmoor, encouraging development to be located near to areas which have good public transport links, which would act against air pollution and congestion issues.

### Key Sustainability Issues, Problems & Opportunities

- 3.28 From the policy context and analysis of the baseline information, the following key sustainability issues have been identified for the Dartmoor Local Plan area:

**Table 3.1: Key Sustainability Issues**

Topic	Key Issue for Sustainable Development
<b>Landscape &amp; Settlement Character</b>	<ul style="list-style-type: none"> <li>■ New development has the potential for an unacceptable effect on the landscape or settlement character &amp; their settings.</li> <li>■ High quality design needs to be promoted to make positive contributions to the landscape and townscape in the National Park.</li> <li>■ Identification of appropriate standards and aspirations for sustainable construction and operation.</li> <li>■ Deterioration of the Valued Attributes of key Landscape Character Types that may be at risk should be prevented.</li> <li>■ Farming practises and forestry activities should not result in landscape deterioration through new access ways such as tracks, new buildings and changes in practises.</li> <li>■ The impact of light pollution from peripheral towns and cities, and development within the National Park, which threatens the dark night skies of Dartmoor, should be minimised.</li> <li>■ Change of farmsteads to residential or holiday lets can harm the integration of farmsteads with the landscape through additional buildings and suburban gardens.</li> <li>■ New infrastructure relating to tourism, including signage can damage landscape character, and infrastructure</li> </ul>

	such as telephone masts, could affect the special characteristics of the landscape.
<b>Biodiversity, Geodiversity &amp; Green Infrastructure</b>	<ul style="list-style-type: none"> <li>■ Dartmoor has internationally, nationally and locally designated biodiversity and geodiversity which cover a large area of the National Park, most of which are in good condition, and need to be protected from effects of development.</li> <li>■ Managing access so that designated sites, priority habitat and priority species are not negatively affected by recreational activities.</li> <li>■ Encouraging sustainable farming practises, and engaging farmers to ensure agricultural methods and development arising from agricultural practises do not result in negative effects on biodiversity.</li> <li>■ Increasing stepping stones and habitat linkages to promote wildlife movement within Dartmoor.</li> <li>■ Dartmoor has a higher than national average of SSSIs in 'Favourable' or 'Unfavourable recovering' condition, with an aim to improve sites which are currently in an 'unfavourable' condition.</li> <li>■ Need to ensure that development does not result in the loss or damage of key habitats and wildlife.</li> <li>■ Climate change will threaten Dartmoor's varied habitats and wide range of species.</li> <li>■ Awareness of currently undesignated areas of biodiversity which may have the potential for designation, and which are still important for local biodiversity and require protecting.</li> <li>■ Ensuring forestry activities are sustainable and do not degrade or result in the loss of key habitats or biodiversity.</li> </ul>
<b>Historic Environment</b>	<ul style="list-style-type: none"> <li>■ Within the National Park there is a range of historical and archaeological features, both designated and undesignated, most of which are in good condition.</li> <li>■ The setting of designated heritage assets such as Listed Buildings and Scheduled Monuments should be protected from development.</li> <li>■ Taking active measure to conserve and improve heritage assets which are considered to be 'At Risk'.</li> <li>■ Protecting historic farmsteads and farm buildings, and promoting the reuse of derelict or abandoned buildings without adverse effects on the character and cultural heritage of the National Park.</li> <li>■ Increasing knowledge and identifying undesignated local archaeological and historical features.</li> <li>■ The character of designated Conservation Areas may be adversely affected from poorly designed new development and modifications to vernacular buildings.</li> </ul>
<b>Soils, Land &amp; Minerals</b>	<ul style="list-style-type: none"> <li>■ The Park area does not include any best and most versatile agricultural land (Grade 1-3a) but it is important that soil resources are not degraded or lost - this is a national issue.</li> </ul>

	<ul style="list-style-type: none"> <li>■ Guarantee any new proposals for mining or quarrying operations do not negatively affect the special qualities of the National Park.</li> <li>■ Promoting the use of previously developed land for development.</li> <li>■ Avoiding development in Mineral Safeguarded Areas which would sterilise resources.</li> </ul>
<b>Water-Resources, Quality and Flooding</b>	<ul style="list-style-type: none"> <li>■ Contributing to water quality improvement throughout the National Park so that at least 60% of water bodies and monitored water length meet good status by 2021 - as required by the Water Framework Regulations through the Environment Agency.</li> <li>■ Possibilities for promoting sustainable management of water resources in new and existing developments.</li> <li>■ Avoiding development in areas of flood risk.</li> <li>■ Investigating opportunities to manage flood risk in upper catchments through changed habitats and land use practices.</li> </ul>
<b>Communities</b>	<ul style="list-style-type: none"> <li>■ An ageing population which will result in increased pressure on local health facilities, and a higher old age dependency ratio (this is also a national issue).</li> <li>■ The decline of some rural settlements due to limited opportunities for appropriate full-time employment.</li> <li>■ Need to allow opportunities for new sustainable uses for rural barns, whilst avoiding conversion to inappropriate uses.</li> <li>■ Cooperation needed where settlements adjoin or are split between Local Planning Authority areas, including Ashburton, Buckfastleigh, Cheriton Bishop and Yelverton.</li> <li>■ New development should be focussed in areas that are the most sustainable and have the capacity for change.</li> </ul>
<b>Housing</b>	<ul style="list-style-type: none"> <li>■ A need for affordable housing for local and young people, and appropriate housing for older people who may be looking to downsize.</li> <li>■ Meeting the housing need for the different demographics within the National Park.</li> <li>■ A high average house price which greatly exceeds the average wage for the area, making access to the property market unattainable for many.</li> <li>■ Special circumstances for succession farm dwellings to enable people to continue to undertake traditional and sustainable farming and woodland management</li> <li>■ Increasing prevalence of second homes and holiday homes</li> </ul>
<b>Health &amp; Equalities</b>	<ul style="list-style-type: none"> <li>■ Need for additional open space and play facilities in some settlements, but in the context of limited opportunities for ongoing maintenance and management funding.</li> <li>■ Highlighted differences in IMD scores between different LSOAs, with some LSOAs more deprived than others</li> </ul>

	<ul style="list-style-type: none"> <li>Promoting access and use of the National Park for different ethnic groups – (also a national issue).</li> <li>Ensuring that disabled people can still access and use the National Park.</li> <li>Higher levels of fuel poverty than the national average.</li> <li>Regional differences in equality, including education and life expectancy discrepancies.</li> </ul>
<b>Economy &amp; Employment</b>	<ul style="list-style-type: none"> <li>Aging population and therefore a decreasing proportion of those who are economically active – (also national issue).</li> <li>Net out-commuting for work, which may increase as peripheral towns and cities grow.</li> <li>Relatively low wages and high house prices which may deter/prohibit young workers living in the National Park.</li> <li>Almost half of businesses are small or micro, and there is a high level of self-employment, with relatively small demand for new floorspace space forecast.</li> <li>Existing employment land and business units are poor to medium quality and small scale, with limited appetite for investment or speculative builds.</li> <li>Relatively high employment in agriculture, but this is forecast to fall while other sectors (construction, businesses services, accommodation and food) are forecast to grow.</li> <li>20-30% of employment is in tourism, with large-scale expenditure in the local economy by tourists.</li> <li>Tourism is dominated by day visitors, although the number of staying visitors is growing suggesting an opportunity to expand and realise greater benefits.</li> <li>Much of the economy depends on the quality of the natural and built environment, and overall natural capital, through encouraging tourism, visitors, and location of businesses.</li> </ul>
<b>Transport, Movement &amp; Air Quality</b>	<ul style="list-style-type: none"> <li>High dependence on private vehicle use with poor and infrequent public transport services – a common feature in rural Devon.</li> <li>Risk of congesting road network in vicinity of new major developments on outskirts of National Park area.</li> <li>Reduce levels of atmospheric pollution, specifically NO2 emissions, and their adverse effects on habitats.</li> <li>The availability of parking is an identified issue in several settlements in the National Park – with potential adverse effects for accessibility to services and facilities.</li> <li>Supporting working from home in rural communities to help ease congestion.</li> <li>Guiding development to areas that have good transport infrastructure and public transport connections.</li> <li>Investing in the Public Rights of Way (PRoW) network to address declining rate of PRoW that is categorised as in 'easy to use' condition.</li> </ul>

	<ul style="list-style-type: none"> <li>Promote sustainable transport in the National Park, improving existing public transport &amp; supporting cycling and walking routes – with potential for secondary positive effects on health and well-being.</li> </ul>
<b>Energy &amp; Climate Change</b>	<ul style="list-style-type: none"> <li>Reducing energy consumption, with a focus on transport which accounts for almost 50% of the National Park's energy consumption.</li> <li>Increasing the energy efficiency of older dwellings, and ensuring new buildings have high energy efficiency standards.</li> <li>Promoting sustainable transport such as walking, cycling and public transport.</li> <li>Mitigating against Climate Change effects, including flood risk and damage to local habitats and wildlife.</li> <li>Adapting to the effects of Climate Change through appropriate design, appropriate siting of development, and considering the availability of water resources.</li> <li>Constraints of national standards for energy whilst the National Park may wish to promote higher sustainability standards.</li> </ul>
<b>Waste</b>	<ul style="list-style-type: none"> <li>Promote recycling, reuse, and composting to improve sustainable waste management.</li> <li>Ensure new developments have appropriate storage for recycling boxes/bins.</li> <li>Avoid inappropriate waste management or waste disposal facilities in the National Park.</li> </ul>

### Updating the Baseline Information

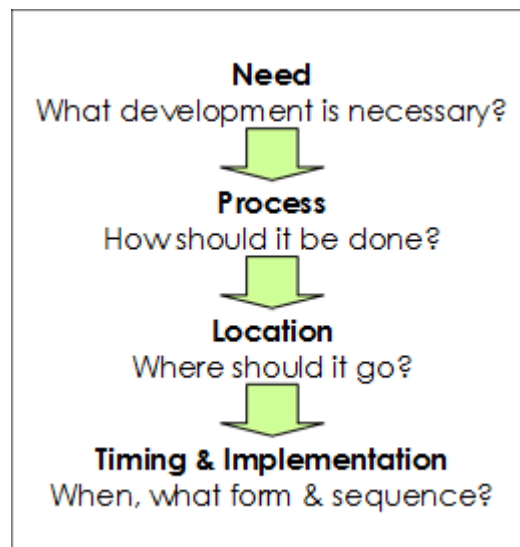
- 3.28 Technical studies were ongoing as the initial SA was being prepared and further studies have been undertaken as the plan preparation continues. Thus, there were information gaps and the SA recorded uncertainty where applicable at this strategic stage of assessment. The baseline information will be kept updated and as appropriate to the stage of the SA.

## 4.0 CONSIDERATION OF PLAN-MAKING OPTIONS & ALTERNATIVES IN SA/SEA

### Assessment of Alternatives in SA/SEA

- 4.1 The EU SEA Directive<sup>63</sup> requires 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 Directive does not specifically define the term “reasonable alternative”; however, UK SA/SEA guidance<sup>64</sup> advises that it should be taken to mean “realistic and relevant” i.e. deliverable and within the timescale of the plan. The NPPF (paragraph 32) requires that a Sustainability Appraisal which meets the requirements of the SEA Directive should be integral to the plan preparation process.
- 4.2 Extant SEA guidance<sup>65</sup> sets out an approach and methods for developing and assessing alternatives. This includes acknowledgement of a hierarchy of alternatives that are relevant and proportionate to the tiering of plan-making. Alternatives considered at the early stages of plan-making need not be elaborated in too much detail so that the “big issues” are kept clear; only the main differences between alternatives need to be documented i.e. the assessment should be proportionate to the level and scope of decision-making for the plan preparation. The hierarchy of alternatives may be summarised in the following diagram:

**Figure 4.1: Hierarchy of Alternatives in SA/SEA and Options in Plan-Making**



<sup>63</sup> <http://ec.europa.eu/environment/eia/sea-legalcontext.htm>

<sup>64</sup> <http://planningguidance.communities.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/>

<sup>65</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/7657/practicalguidesea.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf)

- 4.3 Case law in England has clarified and provided further guidance for current practice on how alternatives should be considered in SA/SEA of spatial and land use plans. The Forest Heath Judgment<sup>66</sup> confirmed that the reasons for selecting or rejecting alternatives should be explained, and that the public should have an effective opportunity to comment on appraisal of alternatives. The SA report accompanying the draft plan must refer to, summarise or repeat the reasons that had been given in earlier iterations of the plan and SA, and these must still be valid.
- 4.4 The Broadlands Judgment<sup>67</sup> drew upon the Forest Heath findings and further set out that, although not an explicit requirement in the EU SEA Directive, alternatives should be appraised to the same level as the preferred option; the final SA Report must outline the reasons why various alternatives previously considered are still not as good as the proposals now being put forward in the plan, and must summarise the reasons for rejecting any reasonable alternatives - and that those reasons are still valid. The Rochford Judgment<sup>68</sup> confirmed that the Council had adequately explained how it had carried out the comparative assessment of competing sites and that any shortcomings in the early process had been resolved by the publication of an SA Addendum Report.
- 4.5 A further High Court decision<sup>69</sup> found that the choice of alternatives for environmental assessment is a matter of planning judgment. In *Ashdown Forest Economic Development LLP, Sales, J* held that the planning authority has a substantial area of discretion as to the extent of the inquiries which need to be carried out to identify the reasonable alternatives which should then be examined in greater detail. Under the SEA Directive and Environmental Assessment Regulations 2004, it is the plan-making authority that is the primary decision-maker in relation to identifying what is to be regarded as a reasonable alternative.

### **Assessment of Options in Plan-Making**

- 4.6 Development planning issues, such as how much, what kind of development and where, are considered within the requirements of legislation and policy together with the characteristics of the plan area and the views of its communities. Potential options for resolving such issues are identified by the local planning authorities through various studies, such as population projections and housing need, community strategies, infrastructure capacities, and environmental constraints analysis – and through consultation with the regulators, the public, businesses, service providers, and the voluntary sector.
- 4.7 At the earlier and higher levels of strategic planning, options assessment is proportionate and may have a criteria-based approach and/or expert judgment; the focus is on the key differences between possibilities for scale,

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<sup>66</sup> *Save Historic Newmarket Ltd v Forest Heath District Council* (2011) EWHC 606

<sup>67</sup> *Heard v Broadland District Council, S Norfolk District Council, Norwich City Council* (2012) EWHC 344

<sup>68</sup> *Cogent Land LLP v Rochford District Council* (2012) EWHC 2542

<sup>69</sup> *Ashdown Forest Economic Development LLP v SCLG, Wealden District Council and South Downs National Park Authority* [2014] EWHC 406 (Admin)

distribution and quality of development. At this early stage, the options presented may constitute a range of potential measures (which could variously and/or collectively constitute a policy) rather than a clear spatial expression of quantity and quality. Each option is not mutually exclusive and elements of each may be further developed into a preferred option. As a plan evolves, there may be further consideration of options that have developed by taking the preferred elements from earlier options. Thus, the options for plan-making change and develop as responses from consultation are considered and further studies are undertaken.

- 4.8 At the later and lower levels of development planning for site allocations, options assessment tends to be more specific - often focused on criteria and thresholds, such as land availability, accessibility to services, and impacts on local landscape, and particularly informed by technical studies such as the Land Availability Assessment (LAA), and Strategic Flood Risk Assessment (SFRA). There is a hierarchy of options assessment with site options that are not viable or deliverable or might have adverse effects on protected environmental assets rejected at an early stage.
- 4.9 The role of the SA is to inform the National Park Authority on the selection and assessment of options; SA is undertaken of those reasonable alternatives (options) identified through the plan-making process. The findings of the SA can help with refining and further developing these options in an iterative and ongoing way. The SA findings do not form the sole basis for decision making – this is informed also from planning and other studies, feasibility, and consultation feedback.

### **Options Considered for the Dartmoor Local Plan**

- 4.10 The role of a spatial strategy is to provide direction for the application of other policies in line with the agreed vision and objectives of the plan. Such a strategy should provide a spatial dimension by promoting development in the most sustainable locations and discouraging development in places that would be inappropriate or lead to unacceptable adverse effects on the environment and communities. The DNPA identified four reasonable approaches to a spatial strategy for Dartmoor; these have been tested through the SA process and the findings were provided in the Initial SA Report (December 2017) and this SA Report in the following Section 5.
- 4.11 Having identified the most suitable spatial strategy, other options available for the plan-making process are to investigate development site options for possible allocation in the new Local Plan. All reasonable options (suitable and deliverable) for allocating land for identified housing and employment need in the National Park were tested through the SA process. Details are provided in Appendix V of this SA Report and the findings discussed in Section 6.
- 4.12 Doing nothing is not a reasonable alternative for the DNPA as the authority is required to provide sufficient development land to meet the needs of the local communities for housing and employment.

## **Duty to Cooperate**

- 4.13 It may be noted that there is also a legal duty for the DNPA to cooperate with other local planning authorities to help maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters. A Duty to Co-operate Scoping Report<sup>70</sup> was prepared by DNPA in 2017. The Scoping Report outlines the strategic matters for the Dartmoor Local Plan and outlines who the DNPA will co-operate with regards to specific strategic matters, including cooperation with regards to meeting housing targets and community services and infrastructure.
- 4.14 Development growth outlined in the surrounding Local Plans will likely result in increased pressures on the National Park, especially for recreation, light pollution, traffic and air quality, noise/tranquillity, and landscape. This is also important for the HRA and the assessment of likely significant effects – individually and in-combination with other plans and projects – on the protected nature conservation sites.

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<sup>70</sup> DNPA (2017) Duty to Co-operate Scoping Report

## 5.0 SA OF VISION & OPTIONS FOR THE SPATIAL STRATEGY (2017)

### Vision

- 5.1 The Issues Paper published for consultation between October 2016 and January 2017 asked various questions designed to help shape the vision and the next Local Plan. The responses to the consultation suggested, perhaps inevitably, several competing priorities for future policy but taking into account the key elements for a local plan that seeks to achieve sustainable development, a Vision was drafted as follows:

**Decent homes**  
**A place to do business**  
**Sustainability – living within environmental limits**  
**Culture and arts**  
**Exemplars for good development**  
**Community involvement and participation**  
**Prosperous and vibrant communities**  
**Resilient landscape**  
**Thriving habitats and species**  
**An historic environment in excellent condition**  
**Opportunities for access and enjoyment**

- 5.2 A compatibility analysis was undertaken of the draft Vision and is shown in Appendix I of the Initial SA Report (December 2017). Generally, compatibility was positive or neutral for most of the elements of the Vision compared against the SA Objectives. At this strategic level of assessment, certain assumptions are made, for example – all development can promote a high standard of built quality as will be required by policy and therefore, a positive compatibility was applied. There is strong compatibility for living within environmental limits, thriving habitats, an excellent historic environment, and a resilient landscape, especially with aims for community involvement and exemplars for good development.
- 5.3 There were no direct incompatibilities found. It is recognised that there could be an inherent incompatibility between the aims, for example, thriving habitats & species and increasing access, and whilst this can be managed through careful planning, there remains some uncertainty at this stage of assessment until detailed development management policies are prepared. Uncertainty of compatibility was a particular aspect for traffic and the possibilities for sustainable transport objectives. It is appreciated that these SA Objectives are difficult to progress in a rural area that has to rely on vehicle transport, particularly the private car – and in an area characterised by narrow congested roads.

- 5.4 The draft Vision was revised as a result of comments received through consultation and discussion; the revised Vision was subject to updated SA and this is discussed further in the following Section 6.

### Options for the Spatial Strategy

- 5.5 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: East Dartmoor 1 & 2; South East Dartmoor; South West Dartmoor; Teign Valley; Bovey Valley; Upper Teign; North East Dartmoor; West Dartmoor; High Moor

- 5.6 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) and are provided in Appendix IV of this SA Report; the findings are summarised in the Table 5.1, as follows:

**Table 5.1: Summary SA of Options for Spatial Strategy**

Sustainability Objective	1. Current Two Tier		2. Size, Character with Two Tiers		3. Size, Character with Three Tiers		4. Spatial or Clustered	
1. To conserve and enhance the <b>landscape and settlement character</b> of Dartmoor National Park <sup>71</sup>	+	+	++ ?	++ ?	++	++	++	++
2. To conserve & enhance the character, safety & sustainability, of the <b>built environment</b> by raising the <b>quality</b> of design and construction	+		+		+		+	
3 To protect, enhance and manage <b>biodiversity &amp; geodiversity</b> for net gain <sup>72</sup>	0?	?	0	++	0	++	0?	?

<sup>71</sup> Please note that first symbol refers to landscape, second symbol to settlement character

<sup>72</sup> Please note that first symbol relates to biodiversity, second to Green Infrastructure

4. To ensure the protection, conservation, and enhancement of the <b>historic environment</b> & its setting	0		+?		+		0	
5. To protect and conserve <b>soil, land and minerals</b> <sup>73</sup>	-	0	-	0	-	0	-	0
6. To promote efficient <b>water</b> use and improve water quality <sup>74</sup>	+	0	+	0	+	0	+	0
7. To reduce the risk of flooding from all sources and manage <b>flood risk</b> more sustainably	0		+?		+?		0	
8. To maintain and enhance <b>community and settlement identities</b> distinctive to Dartmoor	+		++?		++		?	
9. To support the provision & accessibility of <b>services &amp; facilities</b>	+		++?		++		?	
10. To ensure that the <b>housing</b> needs of all National Park residents are met	+		++?		++		+	
11. To improve the <b>health and wellbeing</b> of communities and reduce inequalities <sup>75</sup>	+	?	+	?	+	?	?	?
12. To promote & support the <b>economy</b> , especially key business sectors of tourism, agriculture, leisure/recreation & small businesses	+?		++?		++		?	
13. To help <b>reduce congestion</b> , particularly on outskirts of the National Park, and reduce associated indirect impacts on <b>air quality</b> and <b>greenhouse gas emissions</b>	0?		0		0		?	
14. To encourage a change to <b>sustainable transport</b> modes and to reduce the need to travel	0?		0		0		?	
15. To reduce <b>waste</b> & promote reuse & recycling	0		0		0		0	

- 5.7 The character, quality and protection of the landscape of the Dartmoor National Park(DNP) is fundamental to its designation and statutory purposes. All four options seek to protect the open countryside from unchecked growth with likely positive effects for SA objectives on landscape and settlement character. Options1, 2 & 3 focus development in the largest settlements, but Options 2 & 3 take into account the capacity and sensitivity of settlements such that negative effects would be mitigated and more significant positive effects are indicated. The effects of the clustered approach in Option 4 is uncertain as it is not clear how the capacity and sensitivities of the settlements would be considered. All four options have the potential to support sustainable high-quality design and energy efficiency in accordance

<sup>73</sup> Please note that first symbol relates to soil, second symbol relates to minerals

<sup>74</sup> Please note that first symbol relates to water resources, second symbol to water quality

<sup>75</sup> Please note that first symbol relates to open space, second symbol relates to green infrastructure

with emerging draft DNPA Policies and the Design Guidance – with minor positive effects.

- 5.8 All four options protect open countryside from unchecked development growth indicating at least neutral effects for biodiversity and geodiversity. Option 1 with the focus on the larger settlements may avoid the sensitive and internationally designated central areas; however, the South Hams SAC is in close proximity to several large settlements and this is an area that will be investigated in more detail through the HRA. At least neutral effects are indicated for Options 2 & 3 as both seek to recognise the sensitivities of settlements such that negative effects would be avoided. The effects of the clustered approach in Option 4 is uncertain but could be neutral, especially with development management policies that will avoid adverse effects on important designated biodiversity and geodiversity. Options 2 & 3 have potential for minor positive effects on Green Infrastructure (GI) as both take account of capacity and sensitivity. Option 1 is uncertain as the focus on the larger settlements may limit opportunities for GI since there may then be less opportunities to promote GI through new development in the smaller settlements and wider area; the effects of Option 4 are unclear.
- 5.9 One of the statutory purposes of the National Park is to conserve and enhance cultural heritage and Dartmoor has a very rich variety of designated heritage assets. All four options protect open countryside from unchecked development growth indicating at least neutral effects for the historic environment. Options 2 & 3 propose more consideration of capacity and sensitivity of settlements to development, indicating confirmation of at least neutral effects and perhaps the potential for enhancement of the historic environment with positive effects - more certainty for Option 3 that recognises three levels of settlement in a more refined analysis. It is uncertain how the approach in Option 4 based on 10 clusters of settlements would affect the historic environment but it is considered that at least neutral effects are likely through likely emerging development management policies.
- 5.10 All four options are likely to take land with loss of the soils resources, considered to be minor negative (Grade 3b-5) and permanent. All four options are likely to respect Mineral Safeguarded Areas (MSAs) and minerals will be protected through Plan Policies such that at least neutral effects are indicated.
- 5.11 Dartmoor is considered to be a major water catchment in the south west, with a network of streams and mires on the high moor feeding into fast flowing rivers. The peat and bogs are important for carbon storage, and for absorbing and releasing large amounts of water – contributing strongly to sustainable water management, climate change resilience, and helping support the objectives for good ecological status for water bodies. All four options can demonstrate efficiency of water use and protection of quality. Options 2 & 3 acknowledge the potential constraints/sensitivity and capacity of settlements; this could include consideration of the capacity of foul water systems/ wastewater treatment works and condition of receiving water qualities. However, South West Water has not indicated any capacity issues for wastewater treatment and water quality in their response to the

Infrastructure Delivery Plan, and therefore, the SA indicates neutral for all strategic options. All options will have to comply with national policy requirements with regard to avoiding flood risk – with at least neutral effects. Options 2 & 3 that also consider the sensitivity and capacity of settlements are likely to offer opportunities to resolve existing problems with positive effects, but uncertainty at this stage.

- 5.12 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. Compared to Option 1, Options 2 & 3 are more likely to recognise the needs and constraints of different communities with the potential for major positive effects; similarly, with regard to effects for accessibility to services and facilities. Option 4 with the ten clusters is uncertain at this stage as effects depend upon the clustering and support of communities – it is unclear whether communities would commit to the levels of discussion to inform decision-making and whether conflicts could be resolved. The Spatial Strategy Topic Paper (October 2017) concluded that this option is unlikely to be feasible or deliverable – overall uncertain effects.
- 5.13 All options can provide sufficient quality housing to meet needs, an appropriate mix of types, including affordable & adaptable – with minor positive effects that will be cumulative in the longer term. Options 1, 2 & 3 include an approach for development in the open countryside necessary to meet with the proven needs of farming & forestry, small scale growth of existing businesses, and other householder development with positive effects. Option 2 & 3 could have major positive effects - this is more likely with Option 3 that recognises three tiers of settlements with a refinement of analysis that will better identify needs, constraints and sensitivities.
- 5.14 Access to Public Open Spaces is likely to be more prevalent in the larger settlements, with positive effects on healthier lifestyles associated, and therefore positive effects for Options 1, 2 & 3. This assumes that public open spaces are more prevalent in the larger settlements; however, many of the smaller settlements could also have such positive effects when Public Rights of Way and open access are taken into account. Some uncertainty remains at this strategic stage of assessment. The additional analysis proposed for Options 2 & 3 might indicate clearer possibilities for enhancing GI. For all options, the effects on access to the National Park is not known at this stage of plan-making and assessment – uncertainty and depends upon other policy.
- 5.15 Options 1, 2 & 3 include an approach for development in the open countryside necessary to meet with the proven needs of farming & forestry, small scale growth of existing businesses, and other householder development – positive effects that are likely to be major for Options 2 & 3 with the additional analysis of capacity and sensitivity, and more certainty for Option 3 with the three tiers. Option 4 with the ten clusters is uncertain at this stage as effects depend upon the clustering and support of communities.
- 5.16 There is the potential for development on the outskirts of Dartmoor to result in an increase in traffic on the local road network, due to an increase in traffic

as residents use the moors for recreational purposes. Any increase in homeworking to reduce travel is largely reliable on houses having connection to fast internet speeds. Options 1, 2 & 3 are likely to have similar effects as development is allocated proportionately to settlements that are largest (Option 1) or have the most capacity/least sensitivity (Options 2 & 3) with the potential for neutral effects by seeking to direct development to where there most services & facilities, thus reducing the need to travel. However, the larger settlements are more likely to have identified parking issues and potentially higher traffic levels. Mitigation of potential negative effects on movement & transport is more certain with Options 2 & 3, where connectivity is one of the factors that is considered with regard to capacity and sensitivity. Option 4 with ten clusters is uncertain at this stage of plan-making and assessment.

- 5.17 All four options have the potential to promote sustainable design and waste management – as guided by other core policies.

### The Preferred Spatial Strategy

- 5.18 The SEA Directive requires that the sustainability/environmental report should include an outline of the reasons for selection or rejection of reasonable alternatives. The Vision & Spatial Strategy Paper (October 2017) details the reasoning with pros and cons for each option, and concludes that Option 3 represents the most suitable approach to pursue in the Local Plan. The reasons may be summarised as follows:

**Table 5.2: Outline Reasons for Selection/Rejection of Options for Spatial Strategy**

Options	Outline Reasons for Selection/Rejection
1 Current 2 Tier Approach	<ul style="list-style-type: none"> <li>Relies more on separate policy for specific settlement issues</li> <li>Places together a broad range of medium/small sized settlements</li> <li>Limits some opportunities in medium sized settlements</li> </ul>
2 Settlement Size & Character (2 Tier)	<ul style="list-style-type: none"> <li>Better recognises the needs &amp; constraints of different settlements</li> <li>Focuses development in largest settlements where capacity is greatest</li> <li>Protects more sensitive settlements</li> </ul>
3 Settlement Size & Character (3 Tier)	<ul style="list-style-type: none"> <li>Better recognises the needs &amp; constraints of different settlements</li> <li>Focuses development in largest settlements where capacity is greatest</li> <li>Protects more sensitive settlements</li> <li>Seeks to provide opportunities in smaller villages</li> </ul>
4 Spatial or Clustered Approach	<ul style="list-style-type: none"> <li>Provides greatest flexibility but creates a more complex &amp; difficult to manage approach</li> <li>Could lead to unmet need in certain settlements</li> </ul>

	<ul style="list-style-type: none"><li>■ Challenging to establish &amp; requires cooperation between communities</li><li>■ Difficult to get consensus on lines between areas</li></ul>
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### **Representations on the Initial SA Report (December 2017)**

- 5.19 There were no representations specific to the Initial SA Report received during the consultation period on the Draft Vision and Strategic Options for the Local Plan Review. Appendix VII of this SA Report lists the comments and responses received during the SA scoping and the initial HRA screening (August 2017).

## 6.0 SA OF THE DARTMOOR LOCAL PLAN REVIEW Regulation 18 (2018)

### The Vision, Spatial Strategy & Planning Applications

- 6.1 **The Vision** sets the overall direction for the Local Plan. It was refined following consultation and discussions during 2018 and including two additional aims for making the best use of resources, and farming, forestry and land management. The Vision for the Dartmoor Local Plan is as follows:

#### Decent homes

There is access to well designed, energy efficient and affordable housing for those who contribute to Dartmoor's thriving communities.

#### A place to do business

Businesses which respect, value and contribute to Dartmoor's Special Qualities have the opportunity to thrive and innovate.

#### Sustainability – living within environmental limits

Dartmoor's natural resources are conserved and there are opportunities for innovation in the way in which we live and work which allow us to achieve and maintain an environmental, social and economic balance and reduce our contribution to climate change.

#### Making best use of resources

Dartmoor's land, resources and buildings are **used** efficiently, effectively and sustainably. Development prioritises previously developed land and minimises empty homes.

#### Culture and arts

The National Park's Special Qualities provide a continual source of inspiration and are celebrated in culture and the arts.

#### Exemplars for outstanding development

All new development has a character which respects local distinctiveness, vernacular and materials, and leads the way on sustainable building.

#### Community involvement and participation

Dartmoor is a place where people work together with a collective goal to respect and protect the National Park, and to promote and embrace positive change.

#### Prosperous and vibrant communities

Dartmoor's towns and villages provide opportunities for communities to thrive.

#### Farming, Forestry and Land Management

Farming and forestry have the opportunity to evolve and innovate, sustaining their vital role in conserving and enhancing Dartmoor's distinctive cultural heritage, internationally significant landscape and precious biodiversity.

#### Resilient landscape

Dartmoor's nationally important landscape character is conserved and enhanced. Its wider landscape setting is respected.

#### Thriving habitats and species

A cohesive network of habitats allows species to thrive and be resilient to climate change.

- 6.2 As reported in the Initial SA Report (December 2017) compatibility was generally positive or neutral for most of the elements of the Vision compared against the SA Objectives. There is strong compatibility for living within environmental limits, thriving habitats, an excellent historic environment, and a resilient landscape, especially with aims for community involvement and exemplars for good development. The additional aims for making best use of

resources and farming, forestry and land management indicate strong compatibility for many SA Objectives, with particular positive effects for communities and the economy/employment with the vision for innovation.

- 6.3 There were no direct incompatibilities found. It is recognised that there could be an inherent incompatibility between the aims, for example, thriving habitats and increasing access, but this can be managed through careful planning. Uncertainty of compatibility was a particular aspect for traffic and the possibilities for sustainable transport objectives. It is appreciated that these SA Objectives are difficult to progress in a rural area that has to rely on vehicle transport, particularly the private car – and in an area characterised by narrow congested roads.
- 6.4 The EqIA identified that the overall plan and policies will not exclude any of the protected characteristics. However, it was noted that access and enjoyment in the Vision is 'for everyone', but that such inclusivity for the National Park's communities is not explicit in the other aims. Therefore, the SA suggested that this could be added – perhaps to the aim for prosperous and vibrant communities.

### **SA of Strategic Policies 1.1, 1.2 & 1.3 The National Park & Sustainable Development**

- 6.5 The NPPF (paragraph 172) gives great weight to conserving and enhancing landscape, scenic beauty, wildlife and cultural heritage in National Parks. The Local Plan must be prepared within the statutory context of the two purposes and duty for the English National Parks. The National Park purposes area:
- To conserve and enhance the natural beauty, wildlife and cultural heritage of the area, and
  - To promote opportunities for the enjoyment and understanding of the Special Qualities of the National Park
- 6.6 Strategic Policy 1.1 Delivering National Park Purposes & Protecting Dartmoor's Special Qualities makes clear at the beginning of the Local Plan that greater weight will be attached to the first purpose. Policy 1.1 also makes clear that the DNPA will have regard to its duty to seek to foster economic and social wellbeing of the local communities in the National Park, provided such development is compatible with National Park purposes.
- 6.7 Strategic Policy 1.2 Sustainable Development in Dartmoor National Park provides guidance on what sustainable development means. Strategic Policy 1.3 Presumption in Favour of Sustainable Development explains how a positive approach that reflects the requirement for sustainable development in the NPPF will be applied.
- 6.8 Thus, the scope and context for the Local Plan is set out and as such is likely to have positive effects for progressing all the SA Objectives in the SA framework as this was developed to align with the scope and sphere of influence of the Local Plan for the Dartmoor National Park.

6.9 The aim of the **Spatial Strategy Policy 1.4** is to:

- Focus the majority of development opportunities in the most sustainable locations and where it relates well to existing development
- Enable appropriate development opportunities in other less sustainable locations where it is justified and relates well to existing development
- Avoid development in locations which are not sustainable
- Direct development away from areas of sensitivity or conservation importance

6.10 The Spatial Strategy sets out a 3-tier approach that focuses new development in 8 Local Centres that are the largest and most sustainable settlements in the National Park, and into 16 Rural Settlements that are the larger villages with relatively good access to services. The settlements in both these categories have defined Settlement Boundaries; and the Local Centres have allocated development sites but not the Rural Settlements.

6.11 The Strategy further recognises 18 Villages and Hamlets that are the smallest, most sensitive and isolated settlements but that still have small scale housing and business needs. These settlements have no defined Boundaries and more limited development opportunities. Outside of the classified settlements, development in the Open Countryside is strictly limited to development and activities that need to take place – such as farming, forestry, conservation of historic buildings, and farm diversification.

6.12 As explained in the Initial SA Report (December 2017), the principles and approach of this Spatial Strategy focus development in the largest settlements where capacity is greatest and better recognises the needs, constraints and characters of the different settlements. Whilst it does protect the more sensitive settlements, it also seeks to provide opportunities in the smaller villages. The SA found major positive effects for SA Objectives on landscape, settlement character and identity; access to services and facilities; housing; and the economy. Minor positive effects were indicated for the built and historic environments; water resources, and flooding; and health and wellbeing. These effects are likely in the short and longer-terms and may also become cumulative.

6.13 All new development (except for previously developed land) will involve the loss of soils with a permanent residual minor negative effect. The SA found at least neutral effects and some potential for minor positive effects with regard to SA Objectives for biodiversity and geodiversity. Neutral effects were identified for SA Objectives on water quality, minerals, waste, and transport/movement as the Strategy seeks to direct new development in the most sustainable locations, thereby reducing potential effects.

6.14 Some uncertainty was found by the SA with regard to the extent of positive effects on biodiversity and resolving existing flooding problems - as this will be locationally specific and depends upon the precise location of sites allocated. Also, it was unclear how the Spatial Strategy could affect SA

Objectives for promoting access and use of the National Park for disabled people and different ethnic groups – uncertainty recorded.

### **SA of Strategic Policies 1.5 Major Development & 1.6 Design**

- 6.15 Strategic Policy 1.5 sets out that major development will not be allowed other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest, outweighing National Park purposes. This will ensure that there are no significant negative effects for SA Objectives, especially those for conserving and enhancing landscape, settlement character, biodiversity/geodiversity, the historic environment, soils, water, communities and their supporting services.
- 6.16 Strategic Policy 1.6 Delivering Good Design is fundamental to complying with the requirements of Strategic Policies 1.1-1.4. This will ensure that there are likely positive effects in both the short and longer terms for SA Objectives No 1 Landscape, 2 Design Quality, 8 Community Identity, and 11 Health & Wellbeing. The Policy will help ensure that there are no significant negative effects for SA Objectives on environmental quality and assets - Nos 3, 4, 5, 6 & 7; neutral effects likely on the remaining SA Objectives. The positive effects will be cumulative and there is the possibility for synergistic effects depending upon precise location.

### **SA of Site Options: Housing & Employment**

- 6.17 Potential site options identified through the Land Availability Assessment studies (LAA, 2017)<sup>76</sup> 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 and with details provided in Appendix V of this SA Report. The summary findings of the SA of the site options are set out in the table as follows:

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<sup>76</sup> <http://www.dartmoor.gov.uk/living-and-working/business/planning-policy/background-evidence/land-availability-assessment-shlaa>

**Table 6.1: Site Options Summary SA Findings**

SA Objectives	Landscape & Settlement Character <sup>77</sup>		High Quality Design	Biodiversity & Geodiversity	Heritage	Soils & Minerals <sup>78</sup>		Water Use & Quality	Flooding	Community & Settlement Identifies	Services & Facilities	Housing	Health & Equality <sup>79</sup>	Economy & Employment	Congestion, Parking & Access	Sustainable Transport	Waste	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15			
Site Ref/DNPA LAA Ref Yield - capacity for new homes	Summary Sustainability Appraisal Findings																	
ASHBURTON																		
Chuley Road Yield 7-11	0	+	N/A	--	--	+	0	0	--?	+	+	+	+	0	-	-	++	N/A
08/052 Longstone Cross Yield 24-36	-	0	N/A	--	0	-	0	0	-?	+	+	+	+	0	0	0	++	N/A
14/112 Kenwyn, Western Road Yield15-20	0 ?	-	N/A	--	-	- ?	0	0	0	-	+	+	+	0	-	-	++	N/A
16/015 Tower Hill Farm Yield 16-24	-	0	N/A	0	0	-	0	0	-?	+	+	+	+	0	0	0	++	N/A
BUCKFASTLEIGH & BUCKFAST																		
08/009 Land at Oaklands Road LAA Yield 31-47	-	0	N/A	--	0	+	0	0	0	+	+	+	+	0	0	-	++	N/A

<sup>77</sup> Please note that first symbol refers to landscape sensitivity and second symbol refers to settlement character

<sup>78</sup> Please note that first symbol relates to soils quality/agricultural land classification; second symbol refers to minerals

<sup>79</sup> Please note that first symbol relates to open space etc; second symbol refers to green infrastructure

08/046 Land at Wallaford Road (Barn Park) Yield 26	-	0	N/A	--	0	+	0	0	0	+	+	+	+	0	0	-	++	N/A
10/057 Land at Holne Road LAA Yield 16-24	-	0	N/A	--	0	+	0	0	0	-	+	+	+	0	0	-	++	N/A
14/093 Land at Roundcross LAA Yield 31-47	-	0	N/A	--	0	+	0	0	0	-	+	+	+	0	0	-	++	N/A
16/066 Land off Oaklands Park, LAA Yield 20	-	0	N/A	--	0	+	0	0	0	+	+	+	+	0	-	-	++	N/A
14/076 Former Axminster carpets spinning mill Yield 40	+	+	N/A	--	+	++	0	0	-	+	+	+	+	0	-	0	++	N/A
16/038 Land at Timbers Road	-	-	N/A	--	0?	+	0	0	0	-	+	+	+	0	0	0	+	N/A
<b>CHAGFORD</b>																		
14/108 Cattle Market (Crannafords Employment area)	-	0	N/A	0	0	+	0	0	0	-	-	0	-	0	+	0	--	N/A
16/077 Land NW of Lamb Park Yield 36	-	0	N/A	0	0	-	0	0	0	+	+	+	+	0	0	0	+	N/A
<b>HORRABRIDGE</b>																		
14/090 Land at New Park Yield 35	-	0	N/A	0	-	-	0	0	-	+	+	+	+	+	0	0	++	N/A
14/110 Land beside Youldon Way LAA Yield 10-15	-	0	N/A	0	0	-	0	0	0	+	+	+	+	0	0	0	++	N/A
<b>MARY TAVY</b>																		
MTV2 Garage Sites Yield- 23-38	0	+	N/A	-	+	-	0	0	0	++	-	+	+	+	-	0	++	N/A
<b>MORETONHAMPSTEAD</b>																		
08/017 Land south of Station Rd (Thompsons) Yield 26	+	+	N/A	0	-	+	0	0	-	+	+	+	+	-	-	-	+	N/A

08/018 Courtenay Park LAA Yield 25-31	-	0	N/A	0	-	-	0	0	0	+	+	+	+	-	0	-	+	N/A
08/019 Forder Farm LAA Yield 100	-	0	N/A	0	-	-	0	0	0	-	+	+	+	+	0	-	+	N/A
14/095- Chagford Cross Yield 25 & 18	-	0	N/A	0	-	-	0	0	0	+	+	+	+	0	0	-	+	N/A
14/102 Land off Brinning Lane LAA Yield 48-72	-	0	N/A	0	-	-	0	0	0	+	+	+	+	-	0	-	+	N/A
14/121 Queens Road LAA Yield 6-8	-	0	N/A	0	0	-	0	0	0	+	+	+	+	0	0	-	+	N/A
<b>PRINCETOWN</b>																		
10/058 & 10/065 Land at Moorland View LAA Yield 5- 8	0	+	N/A	0	0	+	0	0	0	+	+	+	+	0	0	0	-	N/A
16/079B Bellever Close LAA Yield 3-5	0	+	N/A	0	0	+	0	0	0	+	+	+	+	0	0	0	-	N/A
16/079D Barrack Rd & Tavistock Rd LAA Yield 5-7	0	+	N/A	0	+	+	0	0	0	+	+	+	+	0	0	0	-	N/A
HMP Dartmoor	- ?	- ?	N/A	?	--?	+	0	0	0	-?	+	?	+	0	-?	0	-	N/A
<b>SOUTH BRENT</b>																		
08/040 Land adjoining Fairfield Yield 36	0	0	N/A	0	0	-	0	0	0	+	+	+	+	0	0	-	+	N/A
14/077 Land at Brent Mill Employment area	0	0	N/A	0	-?	-	0	0	0	-	+	0	+	0	+	-	-	N/A
14/078 Land at Corn Park & Crowder Park LAA Yield 92- 157	- ?	0	N/A	0	0	-	0	0	0	-	+	+	+	0	0	-	+	N/A
14/079 Roseland, Corn Park LAA Yield 12	- ?	0	N/A	0	0	-	0	0	0	-	+	+	+	+	0	-	+	N/A
16/078 Land adjacent Palstone Lane LAA Yield 15- 23	- ?	0	N/A	0	-?	-	0	0	0	+	+	+	+	+	0	-	+	N/A

16/051 Land off Palstone LAA Yield 15 & 34	- ?	0	N/A	0	0	-	0	0	0	+	+	+	+	0	0	-	-	N/A
<b>YELVERTON</b>																		
08/033 Land at Gratton Lane LAA Yield 29-44	-	0	N/A	0	0	-	0	0	0	-	-	+	+	0	0	-	-	N/A
16/064 Land off Binkham Hill Yield 41	-	0	N/A	0	0	-	0	0	0	-	+	+	+	0	0	0	++	N/A
14/073 Land at Elfordtown Farm Yield 40	-	-	N/A	0	-	-	0	0	0	+	+	+	+	+	0	-	++	N/A
14/107 Land at Gratton Cross LAA Yield 18-27	-	0	N/A	0	0	-	0	0	0	+	+	+	+	0	0	-	++	N/A

- 6.18 **Landscape & Settlement Character:** Most of the site options investigated are likely to have minor negative effects on SA Objective No 1 Landscape because the sites are located within the National Park boundary and tend to have medium to high landscape sensitivities<sup>80</sup>. However, several options are located within existing urban form and without any designated landscape sensitivity - two options in Ashburton, one in Mary Tavy, three in Princetown, and two in South Brent – and therefore with neutral effects in SA. Two options are previously developed land (Former Axminster carpets site in Buckfast & Land south of Station Road in Moretonhampstead) and therefore, were identified for positive effects as new development will help to resolve an existing sustainability issue through regeneration.
- 6.19 Most site options were found by the SA to have at least a neutral effect on settlement character as most are located within the existing settlement boundaries. Development at these options would be expected to comply with the high standards in the Design Guide SPD<sup>81</sup> that will ensure new development is respectful of the local townscape and character. Certain options (Kenwyn Ashburton, Land at Timbers Yard Buckfastleigh, & Land at Elfordtown Farm, Yelverton) were found to have potential minor negative effects. The potential for redevelopment at HMP Dartmoor in Princetown has the possibilities for enhancement but the prominence of the prison in the townscape indicates minor negative effects with uncertainty at this stage of assessment until further details are available.
- 6.20 Minor positive effects were found for those site options on previously developed land as their redevelopment would contribute positively to the local townscape and settlement character – Chuley Road Ashburton, Former Axminster carpets site in Buckfast, Garage sites in Mary Tavy, Land south of Station Road in Moretonhampstead, and sites in Princetown.
- 6.21 **Biodiversity & Geodiversity:** The SA of the site options for Ashburton and Buckfastleigh/Buckfast identified potential major negative effects for biodiversity as sites (with the exception of Tower Hill Farm) are located within the foraging flightpaths<sup>82</sup> for greater horseshoe bats associated with the European designated site the South Hams SAC. This implications for disturbance of bats' activities, the significance of potential effects, and possibilities for mitigation measures were investigated through the HRA and discussed further in this SA Report later in this Section 6.
- 6.22 Princetown site options are all within the Dartmoor Strategic Nature Area (SNA), designated for its upland heath habitat<sup>83</sup>. However, as all site options are brownfield, it is not expected that there will be a significant effect on the SNA. The effects of redevelopment at the prison on biodiversity is uncertain until further site level assessments are conducted.

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<sup>80</sup> LUC for DNPA (July 2017) Dartmoor Landscape Sensitivity Assessment

<sup>81</sup> <http://www.dartmoor.gov.uk/living-and-working/planning/planning-policy/local-plan/design-guide>

<sup>82</sup> Dartmoor National Park Authority GIS Layers (2017)

<sup>83</sup> <http://www.dbrc.org.uk/strategic-nature-areas/>

- 6.23 All other site options were found to be neutral with regard to effects on biodiversity and geodiversity as they are not located within Priority Habitats, SSSIs or Strategic Nature Areas. There is the potential for cumulative loss of undesignated habitat (hedgerow, trees and grassland) across the site options, which could have a negative effect on local wildlife movement and habitat linkages. However, it is expected that development will be able to retain existing hedgerows and vegetation where possible and supported by Local Plan Policy.
- 6.24 **Historic Environment** (assets & settings): Most site options were found to have neutral effects through the SA because they are not within or adjacent to any designated heritage assets (such as a Conservation Area or Listed Buildings), nor within or adjacent to a Premier Archaeological Landscape Area. For Princetown, due to the number of Listed Buildings within the Prison and the contribution it makes to the Conservation Area of Princetown, redevelopment at the prison has the potential for a major negative effect on the historic environment. However, there is uncertainty until further assessments are completed.
- 6.25 One site option in Ashburton (Kenwyn, Western Road) has the potential for a minor negative effect on the setting of the Conservation Area, and the northern edge of another site (Chuley Road) is within the Conservation Area with potential for major negative effects. One site option in Horrabridge (Land at New Park) has the potential for a negative effect on the setting of the Conservation Area. Most site options in Moretonhampstead were found to have the potential for minor negative effects on the historic environment due to their location within or adjacent to the Conservation Area and various Listed Buildings and their settings.
- 6.26 Two site options in South Brent (Land at Brent Mill & Land adjacent to Palstone Lane) have the potential for negative effects on the Historic Farmsteads. There is some uncertainty at this strategic level until site level historic assessments are completed. Potential positive effects were indicated for the Garage Sites in Mary Tavy that are partly within the Conservation Area - development can regenerate disused buildings and positively contribute to the Conservation Area.
- 6.27 The existing development at the former Axminster carpets site in Buckfast is considered to have a significant negative effect on the nearby heritage assets. Therefore, development at the site option has the potential to improve the setting of the Listed Buildings and Scheduled Monument by regenerating the existing development with a potential minor positive effect. Similarly, with the site option Barrack Road/Tavistock Road in Princetown - it is expected that development here could improve the setting of the Listed Building and potential for a minor positive effect.
- 6.28 **Soils & Minerals:** Many of the site options in Ashburton, Buckfastleigh, Horrabridge, Mary Tavy, Moretonhampstead, South Brent and Yelverton are greenfield sites and thus, minor negative effects for loss of soils that is permanent. None of the site options are on known best and most versatile agricultural land (grade 1-3a) so no major negative effects indicated. Site

options at Chuley Road, Ashburton, former Axminster carpets in Buckfast, Land south of Station Road Moretonhampstead, and in Princetown are all previously developed land with major positive effects for this SA Objective No 5 on soils. None of the site options are within or adjacent to a Mineral Consultation Area<sup>84</sup>, with overall neutral effects.

- 6.29 **Water Resources, Water Quality, & Flooding:** It is expected that all site options will be able to incorporate water efficiency measures with overall neutral effects on water resources. None of the site options are considered to have a significant effect on water quality as effluent discharge will be managed by the Environment Agency to comply with necessary standards to protect environmental quality – likely neutral effects.
- 6.30 Most site options are within Flood Zone 1 with a low probability of flooding and a residual neutral effect. However, certain site options were noted to be within Flood Zone 2 or 3 in part with the potential for minor negative effects but uncertainty until further studies are completed – Langstone Cross & Tower Hill Farm in Ashburton, former Axminster carpets in Buckfast, Land at New Park in Horrabridge, and Land south of Station Road in Moretonhampstead. One site option Chuley Road Ashburton is almost entirely located within Flood Zone 2 & 3 with a high probability of flooding and possibility for major negative effects. However, some potential for development at the site option to contribute to managing flood risk and contributing to flood risk management for the area, although this is uncertain at this stage of assessment.
- 6.31 **Communities:** Most site options are likely to have minor positive effects for maintaining community and settlement identities distinctive to Dartmoor, as they are located within existing settlements and tend to be of a smaller size that would not have adverse effects on identity. Certain site options were found to have minor negative effects due to specific locational factors – Land at Holne Road & at Roundcross in Buckfastleigh were thought to partially erode the undeveloped and agricultural land that separates Buckfastleigh and Buckfast; the Crannafords employment area at Chagford is separated from the main settlement; integration may be difficult for the larger site option at Forder Farm in Moretonhampstead; redevelopment at the Prison has the potential for negative effects as it is so prominent but uncertain at this stage; two sites at South Brent will erode the gap between the settlement edge and the A38; and two sites at Yelverton were likely to not integrate so well with the existing settlement.
- 6.32 Most site options were found to have minor positive effects as they will support local services/facilities and sustain the vitality of the local centres. Potential minor negative effects for three site options (in Chagford, Mary Tavy, and Yelverton) due to their separateness from the existing settlements.
- 6.33 **Housing:** All site options identified for housing will provide residential development to meet the needs of local people. At the strategic level of assessment, there is uncertainty regarding the precise provision of affordable or adaptable housing, and therefore a long-term minor positive effect was

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<sup>84</sup> Dartmoor National Park Authority GIS Layers (2017)

found although there would be possibilities to increase this to major positive significance when more information is available.

- 6.34 **Health & Equalities:** All the site options were found to be likely to have minor positive effects with regard to accessibility to open space and recreational facilities, usually within walking distance – with long-term positive effects on human health and wellbeing. The exception is Land at New Park, Horrabridge with a potential major positive effect through possibilities to provide additional recreational space, although some uncertainty at this stage of assessment. Most of the site options will not result in any significant loss of green infrastructure indicating neutral effects. Some of the options at Moretonhampstead include public rights of way with the potential for minor negative effects through loss or alteration, although this could be mitigated for through site-specific requirements. One option (Forder Farm) is a larger site with the potential for developer contributions with enhancements to the public network. Similarly, for site options at Roseland & Palstone Lane in South Brent, Land at Elfordtown in Yelverton; these options also have positive effects through enhancement of green infrastructure.
- 6.35 **Economy & Employment:** The SA findings reflect the proposed development at the site options with those for housing found to be neutral for employment and those for employment use were minor positive. At the strategic stage, it is not possible to know precisely if the likely employment would support the key areas for Dartmoor, so none of the options were found to be major positive. Minor negative effects were indicated for two options in Ashburton, two options in Buckfast/Buckfastleigh, one in Moretonhampstead, one in Mary Tavy, and one in Moretonhampstead due to the loss of employment land as the options were considered for housing development; some uncertainty of effects for the redevelopment of the HMP Prison proposals.
- 6.36 **Transport & Movement:** Site options in Ashburton, Buckfastleigh, Moretonhampstead, South Brent and Yelverton tend to have minor negative effects as congestion is a known issue for these settlements. Other options, including those at Chagford, Horrabridge, Mary Tavy, and Princetown were found to have neutral effects.
- 6.37 Major positive effects for SA objectives on sustainable transport for site options in Ashburton, Horrabridge, Mary Tavy, and Yelverton – with good links, public bus services, and good roadside footpaths. This will also encourage healthier lifestyles. Other site options were minor positive effects – at Chagford, Moretonhampstead and South Brent, as bus services were less frequent and/or easy access to safe footpaths was less certain. One site option (Crannafords employment area) at Chagford has no safe walking access with the potential for major negative effects.

### Progression of Preferred Site Options

- 6.38 Certain site options were progressed into the draft DLP and others were not taken forward at this stage of plan-making. The findings of the SA informed this selection, but the SA is not the sole source of information to inform

decision-making as part of the plan preparation. Plan-making takes into account other technical evidence and the comments made during consultation. The site options were chosen as those that would most progress positive sustainability objectives with least potential negative effects, including consideration of cumulative effects for each settlement.

- 6.39 An outline of the reasons in plan-making for selection or rejection of site options by settlement is provided in the table, as follows:

**Table 6.2: Outline Reasons for Selection or Non-Progression of Site Options**

Site Option	Outline reasons for selection or rejection as a preferred site allocation option for the DLP at Regulation 18 consultation stage
<b>ASHBURTON</b>	
08/011 & 08/014 Chuley Road	Allocated as ASH2 in the current DMD & progressed to the draft DLP as proposed Proposal 7.4; has been recently subject to 2 planning applications – land at Tuckers Yard was approved; land at the Outdoor Experience site was rejected but the principle for development acceptable. Site is suitable, available and achievable with a flexible proposal to deliver potential improvements around use of land, flood, highways and townscape.
08/052 Longstone Cross	Allocated as ASH1 in the current DMD & progressed as a larger site (to improve viability) to the draft DLP as proposed Proposal 7.3 and for 100% affordable housing as site is suitable, available and achievable.
14/112 Kenwyn, Western Road	Not progressed as it is a potentially complex site with uncertain viability and yield. Potential for impact on townscape and heritage but may be considered through development management as site lies within the settlement.
16/015 Tower Hill Farm	Not progressed at this stage as concerns around deliverability for affordable housing (availability), and existence of sites which are sequentially preferable in respect of impact upon landscape character.
<b>BUCKFASTLEIGH &amp; BUCKFAST</b>	
08/009 Land at Oaklands Rd	Not progressed because of challenges around in combination HRA and lack of local support arising from highway concerns with preference for other available sites at this stage.
08/046 Land adjacent to Wallaforde Rd	Progressed to the draft DLP as proposed Proposal 7.5 Land at Barn Park because it is suitable, available and achievable.
10/057 Land at Holne Road	Progressed to the draft DLP as proposed Proposal 7.6 Land at Holne Road because it is considered available and developable as demonstrated through an application on the site (subject to viability).
14/093 Land at Roundcross	Not progressed because of landscape and townscape character constraint, and landscape relationship with nearby settlement.

16/066 Land off Oaklands	Not progressed because of landscape character constraint, lack of local support for development in this area arising from highway concerns with preference for other available sites at this stage.
14/76 Former carpet spinning mill	Progressed to the draft DLP as proposed Proposal 7.22 (Axminster carpets) because of the opportunity for mixed use redevelopment improving the local character and use of brownfield land, and community support.
16/038 Land at Timbers Rd	Not progressed to the draft DLP as some concern regarding access and highways.
<b>CHAGFORD</b>	
14/108 Cattle Market (Crannafords)	Progressed to the draft DLP as proposed Proposal 7.8 Land at Crannafords – a part of the employment area to be allocated for business & employment (mixed B class uses) as it will contribute to the existing employment offer, and it will enable access improvements and enhance the quality of the built environment and public realm.
16/077 Land NW of Lamb Park (currently CHG1)	Progressed to the draft DLP as proposed Proposal 7.7 Land at Lamb Park because it is suitable, available and achievable and retains a previously supported/accepted proposal.
<b>HORRABRIDGE</b>	
14/090 Land at New Park	Progressed to the draft DLP as proposed Policy 7.11 Land at New Park because it is suitable, available and achievable and retains a previously supported/accepted proposal (with site boundary altered to exclude flood risk zone).
14/110 Land beside Youldon Way	Not progressed at this stage because of surface water flooding and land stability/mining concerns, in the context of alternative land availability.
<b>MORETONHAMSTEAD</b>	
08/017 Land south of Station Rd	Progressed to the draft DLP as proposed Proposal 7.9 Land at Thompsons because it is suitable, available and achievable and retains a previously supported/accepted proposal with opportunities for enhancement of the local landscape character.
08/018 Courtenay Park	Not progressed at this stage because of sequentially preferable sites of lesser landscape character and historic environment concerns (expressed strongly through community concern around development of this site) being available.
08/019 Forder Farm	Not progressed at this stage because of sequentially preferable sites with a lesser landscape impact being available.
14/095 Chagford Cross (part a) (MTN1) & Bradford Meadow (part b)	Progressed to the draft DLP as proposed Proposal 7.10 Land at Betton Way (part b) and Proposal 7.11 Land at Forder Farm (part a) because they are suitable, available and achievable and (a) retains a previously supported/accepted proposal.

14/102 Land off Brinning Lane	Not progressed at this stage because of sequentially preferable sites with a lesser landscape impact being available.
114/121 Queens Road	Not progressed at this stage because of impact upon landscape character.
<b>PRINCETOWN</b>	
10/058-10/065 Land at Moorland View	Not progressed at this stage because of limited strategic need for site allocation, and site lies within settlement boundary.
16/079B Bellever Close	Not progressed at this stage because of limited strategic need for site allocation and site lies within settlement boundary.
16/079D Between Barrack Rd & Tavistock Rd	Not progressed at this stage because of limited strategic need for site and site lies within settlement boundary.
Dartmoor Prison	Progressed to the draft DLP as proposed Policy 7.13 Land at Dartmoor Prison as this offers the opportunity for a comprehensive redevelopment that is an effective strategy for the conservation of the prison complex with its historic and social heritage.
<b>SOUTH BRENT</b>	
08/040 Land adjoining Fairfield	Progressed to the draft DLP as proposed Proposal 7.16 Land at Fairfield as retained part of allocation SBR1 which is suitable, available and achievable.
14/077 Land at Brent Mill Farm	Progressed to the draft DLP as proposed Proposal 7.17 Land at Brent Mill because of the opportunity to provide for employment development on a site which is suitable, available and achievable.
14/078 Land at Corn Park & Crowder Park	Not progressed at this stage because of sequentially preferable sites with a lesser landscape impact and better community/townscape cohesion being available.
14/079 Roseland, Corn Park	Not progressed at this stage because of sequentially preferable sites with a lesser landscape impact and better community/townscape cohesion being available.
16/078 Land adjacent to Palstone Lane	Not progressed at this stage because of impact upon landscape character.
16/051 Land off Palstone Lane	Progressed to the draft DLP as proposed Proposal 7.14 & 7.15 Land at Palstone Lane (a & b) because site is suitable, available and achievable. There are opportunities to provide deliver a mix of housing including community led self/custom build, and the site is sequentially preferable on landscape character and townscape factors.
Land at Station Yard (SBR2 and SBR3)	Progressed to the draft DLP as proposed Policy 7.18 due to the strategic need to safeguard the opportunity for sustainable transport improvements and support for the protection of the opportunity by Network Rail (retained allocations SBR2 and SBR3).

YELVERTON	
08/033 Land at Gratton Lane	Not progressed at this stage because site is constrained by access via road which is single track in parts with use of virtual footway, and existence of suitable, available and achievable sequentially preferable sites with a lesser highway constraint.
16/064 Land off Binkham Hill	Progressed to the draft DLP as proposed Proposal 7.20 because the site is suitable, available and achievable and sequentially preferable in respect of highway and pedestrian access and relationship with the townscape.
14/073 Land at Elfordtown	Progressed to the draft DLP as proposed Proposal 7.19 because the site is suitable, available and achievable and sequentially preferable in respect of highway and pedestrian access and relationship with the townscape.
14/107 Land at Gratton Cross	Not progressed at this stage because of landscape character impact and highway and pedestrian access constraints.

## SA of Policies & Site Allocations (Policies and Proposals)

- 6.40 The Policies in the draft plan as set out in the Chapters 1-7 were assessed using the strategic SA framework with objectives for sustainability grouped into themes seeking to avoid duplication and better consider inter-relationships between topics. The proposed site allocations were assessed individually and in consideration of cumulative effects for each settlement. The implications of the plan as a whole were also investigated and reported, and as required by the SEA Regulations.

6.41

### Landscape & Settlement Character

SEA Directive Topics: Landscape

Relevant SA Objectives:

- SA Objective 1: To conserve & enhance the landscape and settlement character of the Dartmoor National Park
- SA Objective 2: To conserve & enhance the character, safety, accessibility, adaptability, & sustainability, including energy efficiency, of the built environment by raising the quality of design & construction

- 6.42 Appraisal of DLP Policies: The primacy of the landscape factors for the purposes and duty of the National Park is recognised and explained in the Strategic Policies SP1.1-1.6 – and as assessed earlier in paragraphs 6.5-6.16 of this SA Report. Strategic Policy 2.1 Protecting the Character of Dartmoor's Landscape requires all development to conserve and/or enhance the character of the landscape. The supporting text explains the Character Types (LCT) with their identified Valued Attributes for which change must be managed with minimum impacts. Ways in which development can minimise its effects on landscape character and its setting is explained. Policy 4.6 Sings

& Advertisements and Policy 4.5 Telecommunications provide mitigation measures for specific potential negative visual impacts. Overall, likely major positive effects that will be cumulative in the longer-term.

- 6.43 Appraisal of Site Proposals: Where possible, the DNPA has selected sites for allocation that are within the existing built form of settlements and thus without a designated landscape sensitivity<sup>85</sup> and better able to integrate with existing development thus minimising negative effects, for example at South Brent. New development sites have also been selected to meet with identified local need and spread proportionately to classified settlements throughout the area, thus minimising the potential for cumulative negative effects.
- 6.44 Neutral effects on settlement character were identified for most site allocations; however, minor negative effects remained on landscape SA objectives due to loss of tranquillity, rural/pastoral character, views and/or urbanising effects. However, new development will need to comply with other plan policies, for example, Policies 1.6 and 2.1 require good design and protection/enhancement of landscape, which together with the Design Guide<sup>86</sup>, indicate that such that negative effects can be mitigated. Proposal 7.20 Land at Binkham Hill Yelverton includes site-specific requirements for landscaping to the south and east of the site, recognising its medium-high sensitivity and thus providing some mitigation measures.
- 6.45 The protection and enhancement of the landscape and settlement characters will also have positive effects on people/communities, health & wellbeing, and the economy, especially tourism and recreation/leisure that are key employment areas in the National Park, indicating further synergistic and cumulative effects.

- 6.46 **Biodiversity, Geodiversity & Green Infrastructure**  
SEA Directive Topics: Biodiversity, Flora & Fauna; Health  
Relevant SA Objectives:  
■ SA Objective 3: To protect, enhance & manage biodiversity & geodiversity for net gain, where possible

- 6.47 Appraisal of DLP Policies: Strategic Policy 2.2 Conserving & enhancing Dartmoor's Biodiversity & Geodiversity provides strong guidance and support to progress SA objectives, including a requirement that development should result in no net loss – with at least neutral effects overall. Policy 2.2 asserts that development proposals having adverse impacts on biodiversity or geodiversity sites will only be permitted in exceptional circumstances – and this applies to all biodiversity: international, national and locally designated. The policy sets out the details of the exceptional circumstances test criteria. The supporting text explains in detail the character of ecological networks

<sup>85</sup> LUC for DNPA (July 2017) Dartmoor Landscape Sensitivity Assessment

<sup>86</sup> <http://www.dartmoor.gov.uk/living-and-working/planning/planning-policy/local-plan/design-guide>

and need to protect and restore their connectivity. It lists the important habitats and species and explains how adverse effects may be caused through a variety of activities and including the role of air and water quality. It also explains the importance of geological sites and their contribution to the Special Qualities of the National Park.

- 6.48 Policy 2.3 Biodiversity Enhancement then provides more detailed guidance and explains how new development that would have an impact on biodiversity will be required to make a proportionate contribution to wildlife enhancement with identified thresholds for types of development and types of biodiversity enhancement. The details provided have been carefully prepared to be specific to Dartmoor and to be deliverable – thus indicating at least neutral effects and likely minor positive cumulative effects in the longer-term.
- 6.49 Strategic Policy 2.4 Conserving & Enhancing Dartmoor's Moorland, Heathland & Woodland provides specific guidance for such habitats and explaining that new development must be demonstrated to be necessary for land management and/or public recreation. This will further provide mitigation measures to avoid potential adverse impacts on biodiversity with at least neutral effects and possibilities for minor positive cumulative effects in the longer-term.
- 6.50 Appraisal of Site Proposals: The DNPA has selected sites that are likely to have the least potential negative effects on biodiversity and geodiversity and including by avoiding land that is within or adjacent/near to designated sites. The SA found at least neutral effects for biodiversity for those sites in Chagford, Horrabridge, Moretonhampstead, Princetown, South Brent and Yelverton. The SA had identified some concern with potential major negative effects for the site options that have been progressed as Proposal 7.3 Land at Longstone Cross Ashburton, and Proposals 7.5 Land at Barn Park in Buckfastleigh, and 7.8 Land at Axminster Carpets in Buckfast – due to the proximity of the internationally protected area, the South Hams SAC. This area is designated for several habitats, but the most relevant feature of concern is the Greater Horseshoe Bats, found in caves at Buckfastleigh. The area around is used for foraging and there is the risk of loss of foraging areas and interference with flightpaths.
- 6.51 This was investigated further through the HRA that found mitigation measures provided through the emerging draft South Hams SAC SPD<sup>87</sup> indicate that the site allocation in Ashburton is more than 4km away from the caves such that significant adverse effects are unlikely. The two site allocations in Buckfastleigh (Policy 7.5 & 7.6) and the one allocation in Buckfast (Policy 7.22) are within the 4km zone for bats' foraging and the significance of any effects will need to be investigated through site surveys and further research. Accordingly, these Policies require that any proposals should be supported by a project level HRA to establish that there will be no adverse impact on the integrity of the South Hams SAC.

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<sup>87</sup> <https://new.devon.gov.uk/planning/planning-policies/other-county-policy-and-guidance/south-hams-sac-spd-consultation> and please note that this is now likely to be progressed as guidance (not an SPD) by the authorities

- 6.52 Thus, appropriate mitigation measures are embedded in the Policies to ensure no significant negative effects on internationally important biodiversity from the Local Plan alone. However, some uncertainty re the cumulative effects because HRA AA found some uncertainty re LSEs in-combination with the considerable new development being planned through the Plymouth & SW JCS and the emerging GESP. Whilst the (relatively) small quantum of new development being planned for the Dartmoor National Park area itself is unlikely to give rise to LSEs, the increased recreational pressures arising from the planned development growth around the National Park may risk the integrity of the European sites (especially South Hams SAC) in-combination with the other plans.

6.53

#### **Historic Environment**

SEA Directive Topics: Cultural Heritage, Historic Environment

Relevant SA Objectives:

- SA Objective 4: To protect, conserve, and enhance the historic environment and its setting

- 6.54 Appraisal of DLP Policies: The supporting text to Strategic Policy 2.6 Conserving & Enhancing Heritage Assets explains that the quality of Dartmoor's historic and cultural environment is fundamental to its Special Qualities. The type of designation is explained, together with understanding the four values – evidential, historical, aesthetic, communal - that contribute to the significance of heritage assets and their settings. Policy 2.6 clearly sets out how all development must conserve and/or enhance heritage assets and their settings and including consideration of archaeological interests. This is likely to have at least neutral effects that could be minor positive with enhancement – depends upon precise development and location.
- 6.55 Strategic Policy 2.7 Conservation of Historic Non-Residential Buildings in the Open Countryside supports Policy 2.6 by providing explicit guidance with regard assessing development proposals for re-use and conversion. This clearly recognises changing farming practices and repurposing/adaptation of traditional buildings that continue to be an important feature of Dartmoor's character. Policy Criterion 2b requires that there should be reasonable access – minimising potential negative effects on SA Objective 9 Services & Facilities; Criterion 4 explains that where permanent residential uses are considered acceptable, these will be for affordable or rural workers' accommodation – with further minor positive effects for SA Objective 10 Housing.
- 6.56 Policy 2.8 Enabling Development acknowledges that there may be exceptional circumstances for enabling development to secure a heritage asset's future but that conflicts with other planning policies. The Policy sets out requirements including minimising harm to other public interests, thus providing mitigation measures to minimise any potential negative effects.
- 6.57 Appraisal of Site Proposals: The DNPA has selected sites that are likely to avoid or minimise any negative effects on heritage assets and their settings,

including through selection of size and location of sites. Most of the proposed site allocations were found to have likely residual neutral effects. Some uncertainty was identified for Land at Brent Mill that could have negative effects on the adjacent historic farmstead Brent Mill Linhay<sup>88</sup>; however, Strategic Policy 2.6 will ensure that this heritage asset and its settings are protected indicating a residual neutral effect.

- 6.58 The SA of site options found a potential minor negative effect for site options near the Conservation Area in Moretonhampstead, including the land at Chagford Cross (LAA 14/095). This preferred site has now been divided into two smaller proposed allocations – Proposal 7.12 Land at Betton Way & 7.13 Land at Forder Farm. Strategic Policy 1.6 Delivering Good Design supported by the Design Guide SPD<sup>89</sup> provide mitigation measures that will ensure mitigation measures are implemented to avoid/minimise any negative effects on the setting of the Conservation Area.
- 6.59 The SA of site options found the potential for a major negative effect on the historic environment due to the number of Listed Buildings within the Prison and the contribution it makes to the Conservation Area of Princetown. However, Policy 7.13 Land at Dartmoor Prison requires a redevelopment masterplan for the whole site that should be informed by a Historic Area Assessment – this will contribute to identifying and delivering appropriate mitigation measures for any negative effects with potential for neutral residual effects and possibilities for enhancement.

6.60

#### **Soil, Land & Minerals**

SEA Directive Topics: Soil

Relevant SA Objectives:

- SA Objective 5: To protect & conserve soil, land & minerals

- 6.61 Appraisal of DLP Policies: Although farming is prevalent in the National Park with 86% of Dartmoor declared as utilisable agricultural area<sup>90</sup>, most of the land is designated as Grade 5, least fertile<sup>91</sup>. Due to the poor soil quality, horticulture, arable farming and dairy farming are constrained to small areas; however, non-intensive grazing of sheep, ponies and cattle rely on soil for grazing, and soils are important for supporting biodiversity. Policy 5.7 Agriculture, Forestry & Rural-Based Enterprise Development recognises the potential effects on soils through requirements to avoid harm to natural drainage, contributing to mitigation measures. The Design Guide SPD<sup>92</sup> requires that all new development should consider the risks of pollution, which should include avoiding pollution of soils.

<sup>88</sup> DNPA GIS Layers (2017)

<sup>89</sup> <http://www.dartmoor.gov.uk/living-and-working/business/planning-policy/local-plan/design-guide>

<sup>90</sup> DNPA (2017) State of the Park Report

<sup>91</sup> Natural England (2014) Dartmoor National Character Area Profile

<sup>92</sup> <http://www.dartmoor.gov.uk/living-and-working/business/planning-policy/local-plan/design-guide>

6.62 Strategic Policy 6.1 New or Extended Minerals Operations asserts that major minerals development will not be allowed other than in exceptional circumstances – providing support for SA Objective 5 for sustainable minerals planning. All reasonable mitigation should be provided. Strategic Policy 2.6 Minimising the Impact of Minerals Operations details requirements for minimising negative effects, which with other Plan Policies, provides mitigation measures to reduce effects towards residual minor or neutral. SA Objective 5 to protect future mineral resources is progressed by Strategic Policy 6.3 Minerals Safeguarding with positive effects.

6.63 Appraisal of Site Proposals: All development will involve land take that will reduce the soils resource; however, the relatively small scale of new development proposed in the National Park will minimise such negative effects. The DNPA has also selected sites that are on previously developed land, wherever possible – and as with proposed allocations in Buckfast (Proposal 7.22), Moretonhampstead (Proposal 7.12), and Policy 7.13 at Dartmoor Prison – with major positive effects. None of the site allocations are within or adjacent to a Minerals Consultation Area with an overall neutral effect.

6.64

**Water Resources, Water Quality and Flooding**

SEA Directive Topics: Water, Material Assets

Relevant SA Objectives:

- SA Objective 6: To promote efficient water use & improve water quality
- SA Objective 7: To reduce the risk of flooding from all sources and manage flood risk more sustainably

6.65 Appraisal of DLP Policies: Dartmoor is a major water catchment in the south west, with a network of streams and mires on the high moor feeding into fast flowing rivers. Much of Devon including the city of Plymouth<sup>93</sup>, has its water supplied from Dartmoor. The Roadford Water Resource Zone that provides water to the Dartmoor area is mainly served by Roadford Reservoir and it is predicted<sup>94</sup> that there will be a surplus of water up until 2040 indicating adequate capacity for the plan period and no negative effects. All new development will need to comply with the Design Guide SPD that requires a reduction in water consumption and utilising rain and greywater – all with the potential for positive effects on SA Objective 6 that will be cumulative in the longer-term.

6.66 Most rivers in Dartmoor have moderate to good ecological status<sup>95</sup> with regard to European objectives. There have been improvements to the status of some water bodies which has been achieved through projects that have reduced diffuse and point-source pollution<sup>96</sup>. The chemical and ecological status of waterbodies on Dartmoor is mainly affected by pollution from

<sup>93</sup> Natural England (2014) Dartmoor National Character Area Profile

<sup>94</sup> South West Water (2014) Water Resources Management Plan

<sup>95</sup> DNPA (2017) State of the Park Report

<sup>96</sup> DNPA (2017) State of the Park Report

agricultural runoff<sup>97</sup>. It is assumed that sewage is collected and treated through rural sewage treatment works and localised septic tanks, but no details have been found and this was identified as a potential information gap for the SA. The Design Guide SPD<sup>98</sup> includes requirement for consideration of surfacewater runoff that can contribute to pollution of local watercourses – thus, providing mitigation measures for new development and with overall likely minimal or neutral effects.

- 6.67 The main flood risks on Dartmoor are likely from fluvial sources<sup>99</sup>, although surfacewater flooding including runoff from urban development is a factor. Settlements on the edge of Dartmoor and those located in the steep sided valleys are more susceptible to flooding than those in the central area on higher ground. There are Critical Drainage Areas designated in Ashburton and in part with Tavistock. Policy 1.10 Flood Risk requires all new development to comply with national policy requirements for the sequential test to avoid location of development in flood risk. The Design Guide SPD<sup>100</sup> includes requirement for appropriate drainage and specifies consideration for future years, indicating awareness of resilience to climate change effects.
- 6.68 Policy 5.7 Agriculture, Forestry & Land-Based Enterprise Development includes a requirement that such development should not harm natural drainage – thus, providing mitigation measures for residual neutral effects. Policy 6.6 Renewable Energy Development includes a criterion 1d that such development should not harm air, soil and water quality – providing mitigation measures that should result in residual neutral effects.
- 6.69 The SA noted that Policies 5.1, Business/Tourism; 5.4 Tourist Accommodation, and Policy 7.2 NPs do not include anything explicit regarding avoiding pollution to soils or water. Any new development will need to comply with the Design Guide. Policy 1.6 mentions minimising pollution in supporting text, but this is not explicit in the Policy text. Policy 4.2 specifically mentions Neighbourhood Plans with regard to public open space and similar factors but does not explicitly refer to requirements for environmental factors. The SA considers that development should align with the mitigation hierarchy, seeking to avoid adverse effects, then minimise.

**SA Suggestion:** Policy should make explicit mention of avoiding pollution to soils and water.

- 6.70 Appraisal of Site Proposals: The DNPA has also selected sites that are within Flood Zone 1 and a low probability of flood risk indicating neutral residual effects. The SA of site options found potential flood risks (in part) for sites that have been previously developed – Proposal 7.22 Land at Axminster Carpets, Buckfast and Proposal 7.9 Land at New Park, Horrabridge. The proposed Policies include requirements for Flood Risk Assessments to demonstrate that new development will be safe, not increase flood risk elsewhere, and where possible reduces risk – providing strong mitigation to ensure residual neutral

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<sup>97</sup> Environment Agency Data Catchment Explorer

<sup>98</sup> For example, please see page 91 of the SPD

<sup>99</sup> West Devon Borough Council & DNPA (2014) West Devon Level 1 Strategic Flood Risk Assessment

<sup>100</sup> For example, please see page 91 of the SPD

effects. All new development will have to comply with the Design Guide SPD that requires sustainable water management including provision of Sustainable Urban Drainage Systems that reduce pollution and flooding – with overall neutral residual effects for SA Objective Nos 6 & 7 on Water.

6.71

### **Communities**

SEA Directive Topics: Population & Human Health

Relevant SA Objectives:

- SA Objective 8: To maintain and enhance community and settlement identities distinctive to Dartmoor
- SA Objective 9: To support the provision & accessibility of services and facilities

6.72 Appraisal of DLP Policies: As explained earlier in this section, the Spatial Strategy and Policy 1.4 are founded on the principles of allocating new development according to a settlement hierarchy that takes into account provision of services/facilities and settlement character/identity. Thus, potential negative effects are minimised and possibilities for positive effects may be explored. Strategic Policy 4.1 Supporting Community Services & Facilities requires such existing infrastructure to be protected providing strong mitigation to avoid negative effects.

6.73 Strategic Policy 4.2 Supporting Public Open Space & Sports Facilities similarly provides strong protection for provision and accessibility to such spaces indicating strong mitigation measures to avoid or compensate/enhance any negative effects and with overall at least neutral residual effects on SA Objective No 9.

6.74 Appraisal of Site Allocations: Sites have been selected according to the settlement hierarchy and characters such that mitigation measures are embedded in Local Plan Policies, indicating at least neutral residual effects and possibilities for some minor positive effects where accessibility is enhanced. The proposed employment site allocation Proposal 7.8 at Crannafords, Chagford was identified through the SA for potential minor negative effects as it is more than 1km from services/facilities. However, Policy 7.9 includes a site-specific requirement to enable the delivery of improved cycle and pedestrian access to Chagford, providing mitigation measures that reduce the effects towards at least neutral and some positive effects through such enhancement.

6.75

### **Housing**

SEA Directive Topics: Population & Human Health

Relevant SA Objectives:

- SA Objective 10: To ensure that the housing needs of all National Park residents are met

- 6.76 Appraisal of DLP Policies: The Housing Strategy sets out the principles and approach to meet the identified need for housing for local need; this relates to around 65 new homes to be built in the National Park each year over the plan period 2018-2033. Strategic Policy 3.1 Meeting Housing Need in Dartmoor National Park sets out the requirements with regard to allocations, rural exception sites, and windfall sites (> 5 homes). This includes the requirement that a current affordable housing need must be identified; and the size and tenure mix should respond to need, with further detailed guidance on the approach to be taken in Local Centres, Rural Settlements, and Villages/Hamlets. This all indicates major positive effects on SA Objective No 10 Housing.
- 6.77 Strategic Policy 3.2 Size & Accessibility of New Housing provides further details including requirements for accessible and adaptable dwellings; the policy requirement for complying with extant building regulations confirms that such mitigation measures will be delivered and confirms the likely major positive effects.
- 6.78 The need for affordable housing – including for both the young and the older – has been recognised as a major issue for development planning in the National Park and all new development will also need to comply with the Affordable Housing SPD<sup>101</sup>. Supporting text for Policies 3.3-3.5 Housing in Local Centres, Rural Settlements, Villages & Hamlets clearly explains and defines who is a local person and what is affordable housing. These three policies then set out detailed requirements and thresholds for housing taking into account size and character of settlements. Thus, potential negative effects on community identity and services/facilities are avoided/minimised, and positive effects on housing are optimised with overall major positive effects SA Objective No 10 Housing.
- 6.79 Policies 3.6-3.13 provide further details and guidance for specific housing types and needs. Policies 3.8-3.11 provide guidance that will support rural workers' needs with positive effects for SA sub-objective that seeks to provide for those whose work is important to the National Park, including agricultural and forestry. Policy 3.12 provides for the identified needs of gypsies, travellers and travelling showpeople with positive effects for this ethnic group, and as found through the EqlA (Appendix VI of this SA Report). The EqlA also found particularly positive effects through Policy 3.13 One Planet Development that supports people who want to live a certain sustainable lifestyle with a low impact or small environmental footprint.
- 6.80 Appraisal of Site Proposals: Provision of land for housing was found by the SA of the site options to have at least minor positive effects on SA Objective No 10 Housing, and this will be cumulative in the longer-term. The development of the specific site allocation policies confirms these positive effects and by applying the Housing Strategy and other policies, and certain site-specific requirements for the proportion of affordable housing, overall effects are likely to be major positive.

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<sup>101</sup> <http://www.dartmoor.gov.uk/living-and-working/planning/planning-policy/supplementary-planning-documents/affordable-housing-spd> Please note that this be updated

6.81

### Health & Equalities

SEA Directive Topics: Population & Human Health

Relevant SA Objectives:

- SA Objective 11: To improve the health & wellbeing of communities and reduce inequalities

- 6.82 Appraisal of DLP Policies: The provision of good quality housing and land for employment has positive effects for health and wellbeing<sup>102</sup>. The DNPA has developed a Spatial Strategy and selected site allocations that help ensure that there is capacity for/accessibility to health services/facilities with likely neutral residual effects indicated.
- 6.83 The role of the natural environment to promote health and well-being for people, as well as sustaining wildlife is well evidenced<sup>103</sup>, and the role of the National Park towards residents and visitors is clearly set out in the two Purposes and the Duty that set the overall context for the Local Plan. The DNPA has to carefully balance the Special Qualities of the National Park that can contribute to human well-being whilst managing overall the sustainability of the ecosystem resources and services. The quality of the landscape, character, biodiversity and heritage assets all contribute to human well-being with positive effects.
- 6.84 Policies 2.2-2.4 & 2.6-2.7 are in place to protect and enhance these attributes and assets, thus mitigating potential negative effects from new development and visitors. Policy 2.5 Protecting Tranquillity & Dark Night Skies recognises the sensitivity and increasing rarity of tranquillity<sup>104</sup> and seeks to protect this through requiring new development to avoid all adverse impacts – thus, strong mitigation measures to reduce effects to at least residual neutral. Thus, the National Park area is unlikely to be affected through increased recreation arising from the DNPA Local Plan itself; however, there is risk of cumulative adverse effects from additional recreational use arising from the significant new development planned around the Park from Plymouth & SW JCS and the emerging GESP.
- 6.86 Provision of, and accessibility to, access land and footpaths/cycleways is fundamental to the Purposes and Duty of the National Park. Such recreational access is important to encourage healthy lifestyles for residents and visitors. Strategic Policy 4.8 Access Land, Public Rights of Way, & Permissive Paths ensures that harm to the access network is avoided or minimised with acceptable mitigation; opportunities for enhancement of the network are encouraged – thus indicating at least neutral effects and possibilities for positive effects. This Policy is also discussed later under the section on Transport & Movement.

<sup>102</sup> For example, Marmot M (2010) Fair Society, Healthy Lives: The Marmot Review: Strategic Review of Health Inequalities in England

<sup>103</sup> For example, Green Infrastructure Guidance, Natural England

<sup>104</sup> <https://www.cpre.org.uk/resources/countryside/tranquil-places/item/1839>

- 6.87 Appraisal of Site Proposals: the DNPA has selected site allocations that are within good access of footpaths and cycleways, where possible; thus, mitigation measures to minimise negative effects and promote positive effects for access and health/well-being are embedded into Local Plan Policy. Where access to sustainable modes of travel is not so well provided, site-specific requirements have been included in policies – Proposal 7.22 Land at Axminster Carpets, Buckfast; Proposal 7.8 Land at Crannafords, Chagford; and masterplanning for Policy 7.13 Land at Dartmoor Prison, Princetown requires preparation with the local community and will consider access issues. Proposal 7.12 Land at Thompsons, Moretonhampstead recognises the opportunity to provide a link to the Wray Valley Trail – with positive effects that are likely to be synergistic and cumulative in the longer-term for SA Objective No 11.
- 6.88 Overall, minor positive effects on health and well-being are indicated. The SA Objective also seeks to reduce inequalities. The EqIA assessment found that the components of the Plan will lead to positive effects on the protected characteristics with no negative effects being identified. Certain site-specific requirements, such as provision of a particular % affordable housing, flood risk management, and links to sustainable transport networks, are likely to ensure that there is equality of opportunity and may secure further positive effects for all, including the protected groups. Higher levels of fuel poverty have been indicated as an issue for the National Park and this is likely to be addressed through support for economy sustainability and employment – considered in the following paragraphs. Increased access and use for other groups, specifically disabled and different ethnicity, is another issue – but difficult to address through the Local Plan. The SA found no adverse effects that would specifically preclude such groups from access but no proactive to encourage such access.

6.89

### **Economy and Employment**

SEA Directive Topics: Population & Human Health

Relevant SA Objectives:

- SA Objective 12: To promote & support the economy, especially key business sectors of tourism, agriculture, leisure/recreation and small businesses

- 6.90 Appraisal of DLP Policies: There is strong evidence that work is generally good for physical and mental health and wellbeing for people and communities (for example, LGA 2016<sup>105</sup>); conversely, unemployment contributes to poor health. Much of the economy depends upon the quality of the natural and built environment such that positive effects on biodiversity, landscape, communities, and historic/cultural assets are likely to contribute to positive effects on the economy. Strategic Policy 5.1 Business & Tourism Development recognises that such development should be of a scale and use appropriate for its location with access to the highway network; it must conserve and/or

<sup>105</sup> Local Government Association, Public Health England (2016) Health, Work and Health Related Worklessness: A Guide for Local Authorities

enhance Dartmoor's Special Qualities. Such development is acceptable in principle within or adjoining Local Centres and Rural Settlements thus supporting economic development where appropriate and with positive effects for SA Objective No 12.

- 6.91 Strategic Policy 5.2 Development affecting Town Centres recognises the importance of town centres as the heart of communities; the requirement for a sequential test ensures that significant adverse effects will not occur on the function and character of town centres providing mitigation measures to at least residual neutral effects. Strategic Policy 5.2 Shops & Other Active Uses provides further detailed guidance with regard to uses of buildings such that potential negative effects are avoided or minimised.
- 6.92 Policy 5.4 Tourist Accommodation acknowledges that serviced and non-serviced tourist accommodation businesses make a significant contribution to the tourist economy. The Policy sets out criteria that guides such development to be compatible with the size and character of settlements such that significant negative effects are avoided whilst supporting new development with positive effects for SA Objective No 12. The Policy also addresses the implications of removal of a holiday let occupancy condition.
- 6.93 Policy 5.5 Staff Accommodation for Serviced Accommodation Businesses provides guidance for such accommodation that must be modestly sized, proportionate and tied to the business. This recognises that staff may not be able to afford to live locally, since there is an identified issue for relatively low wages and high house prices and provides a mechanism for supporting businesses with positive effects.
- 6.94 Policy 5.6 Camping & Touring Caravan Sites acknowledges that these can have adverse impacts and sets out how they will be acceptable including through the hierarchy of settlements. Such sites must conserve and/or enhance the Special Qualities of the National Park, thus there is embedded mitigation to avoid negative effects. Support for such businesses will have positive effects for the economy and employment.
- 6.95 Food and accommodation services, together with agricultural activities, are the largest employers in the National Park. Land activities have contributed to shaping the Special Qualities and Policy 5.7 Agriculture, Forestry & Land-Based Enterprise Development requires that these Special Qualities are protected whilst supporting proportionate new development for a proven need. The Policy requires that new development should not harm natural drainage, relate to local topography without significant earthworks; it should conserve and/or enhance particularly landscape character, biodiversity, cultural heritage, tranquillity and dark night skies. Thus, potential negative effects are mitigated; whilst avoidance of harm to natural drainage is specified, pollution to soils, water or air is not explicit. The status of rivers in Dartmoor is mainly affected by pollution from agricultural runoff<sup>106</sup>.

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<sup>106</sup> Environment Agency Data Catchment Explorer

**SA Suggestion:** Policy could include explicit reference to avoiding or minimising pollution to soils, water or air.

- 6.96 Policy 5.8 Farm Diversification acknowledges that whilst farming is currently one of the largest employers in the National Park, over the lifetime of the Local Plan changes are likely and new business activities through diversification can help build resilience. The Policy provides guidance through criteria to help ensure that there are no significant adverse effects indicating at least neutral residual effects for SA Objectives and the possibilities for further positive effects through sustaining business against external change. The recognition of the potential for cumulative impacts in the Policy further provides strong mitigation.
- 6.97 Whilst keeping and riding horses brings pleasure to many and can contribute to the economy, poor quality equestrian development can harm the National Park – and Policy 5.9 Equestrian Development seeks to address such issues. Potential adverse effects are mitigated through policy requirements to conserve and/or enhance factors, especially landscape, biodiversity, cultural heritage, water quality, and dark night skies; harm to natural drainage and the local topography must be avoided. The recognition of the potential for cumulative impacts in the Policy again further provides strong mitigation.
- 6.98 Support for identified business needs indicates positive effects that will be cumulative in the longer-term. Overall, support for businesses and the local economy could contribute to potential further positive effects on economic factors such as wage levels and fuel poverty by keeping people in work, including resilience in a changing world.
- 6.99 Appraisal of Site Proposals: Site allocations and proposals for employment land have been chosen to optimise opportunities to redevelop previously developed land, for example, Proposal 7.22 Land at Axminster, Buckfast; Proposal 7.12 Land at Thompsons, Moretonhampstead; and Policy 7.13 Land at Dartmoor Prison, Princetown. This approach will also support continuing employment in these settlements with positive effects that will be cumulative in the longer-term.

#### **Transport and Movement; Air Quality**

SEA Directive Topics: Population & Human Health; Material Assets; Air; Climatic Factors

Relevant SA Objectives:

- SA Objective 13: To help reduce congestion, particularly on the outskirts of the National Park, and reduce associated indirect impacts on air quality & greenhouse gas emissions
- SA Objective 14: To encourage a change to sustainable transport modes and to reduce the need to travel

6.100

- 6.101 Appraisal of DLP Policies: The Devon & Torbay Local Transport Plan (LTP)<sup>107</sup> provides the overarching strategic context for transport in the area. The LTP outlines the need for rural Devon, including market towns such as Buckfastleigh and Moretonhampstead, to become better connected but there are no planned transport infrastructure projects for the National Park. Congestion is an identified issue that could become exacerbated in the vicinity of new major developments on the outskirts of the National Park area. Supporting text for Policies in the Infrastructure chapter of the Local Plan advises that Transport Statements or Assessments may be needed for new development that could have adverse impacts on transport – and in line with NPPF requirements. The text advises that the appropriate level of transport assessment will be determined on a case by case basis with regard to scale of development and sensitivity of local environment and transport. This provides guidance but without the weight of specific transport policy; it indicates that mitigation is available to reduce or minimise any negative effects arising on transport.
- 6.102 Policy 4.8 Access Land, Public Rights of Way, & Permissive Paths seeks to protect the access network from new development and thus provides strong mitigation measures to avoid significant negative effects with likely residual neutral effects for SA objectives. However, the SA identified that all development could be aiming to enhance the sustainable transport network (not just development that affects the access network) as changing to more sustainable transport modes is an identified issue for the National Park.
- SA Suggestion:** Policy 4.8 - all development should seek opportunities to enhance the sustainable transport network.
- 6.103 Policy 4.3 Parking Standards for New Development; 4.4 Electric Vehicle Charging Points; and Policy 4.5 Public Car Parks address specific issues for the National Park, providing guidance that is supportive of need whilst recognising constraints to ensure mitigation is in place to avoid significant negative effects.
- 6.104 Appraisal of Site Proposals: Site allocations have been selected to have sufficient accessibility to the highway and sustainable transport networks, indicating residual neutral effects. Certain site allocations include issues for access that can be resolved as part of the new development and as such include site-specific requirements for appropriate highway improvements and/or improve pedestrian and cycle access –Proposal 7.22 Land at Axminster Carpets, Buckfast; Proposal 7.8 Land at Crannafords, Chagford; Proposal 7.12 Land at Thompsons, Moretonhampstead; Proposal 7.14 & 7.15 Land at Palstone Lane (a & b), South Brent; and Proposal 7.20 Land at Binkham Hill, Yelverton.
- 6.105 These site-specific requirements provide strong mitigation measures to avoid any significant negative effects for sustainable transport to at least neutral

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<sup>107</sup> Devon & Torbay LTP3 2011-2026 <https://new.devon.gov.uk/roadsandtransport/traffic-information/transport-planning/devon-and-torbay-local-transport-plan-3-2011-2026/>

residual effects. The SA considered that there could be possibilities for some positive effects that could be synergistic and cumulative (for example, the requirements to link with the Wray Valley Trail) in the longer-term.

**SA Suggestion:** Policy could include requirement to investigate opportunities for enhancing links to the wider sustainable transport network, for example, through a transport impact assessment.

6.106

### **Waste, Energy & Climate Change**

SEA Directive Topics: Material Assets

Relevant SA Objectives:

- SA Objective 15: To reduce waste and promote reuse and recycling

- 6.107 Appraisal of DLP Policies: Policy 6.4 Waste Prevention requires all new development to seek to prevent waste and sets out details regarding how waste minimisation will be demonstrated and in accordance with the waste hierarchy. This provides strong mitigation to minimise negative effects and promote positive effects for SA Objective No 15 on waste. All new development, including site allocation proposals, will have to comply with this Policy indicating an overall positive residual effect. Policy 6.5 Waste Disposal & Recycling Facilities sets out how small-scale community-based facilities will be supported – with positive effects that will be cumulative. It requires all development to mitigate against environmental and socio-economic impacts, thus providing mitigation measures.
- 6.108 With regard to climate change, the effects of emissions from vehicles were considered through SA Objective 12 Transport; energy efficiency in buildings through SA Objective No 2 Design; and flood risk through SA Objective Nos 6&7 on water – in order to avoid duplication of assessment.
- 6.109 Policy 6.6 Renewable Energy Development sets out how small-scale energy development will be permitted where it does not harm the Special Qualities of the National Park. This provides strong mitigation to avoid significant negative effects on landscape, biodiversity, geodiversity, cultural heritage, tranquillity, dark night skies, residential amenity (noise, light, movement, odour, vibration), soil, air & water quality, flood risk, and soil stability. Avoidance of harmful cumulative impacts are specified for landscape character; it is considered that this could be applied to all the sustainability factors.

### **Interrelationships Between Topics**

- 6.110 All topics are closely inter-related for the assessment of sustainable development for the National Park. The landscape, biodiversity, cultural/heritage environment, and character and health of people/communities all have formed and continue to contribute to the Special Qualities that attract residents and visitors. The protection and

enhancement of such attributes has further effects on the economy, especially for recreation, tourism and farming/land-based activities.

### **Cumulative Effects**

- 6.111 The careful selection of Site Proposals through a Spatial Strategy that aims to allocate new development proportionately to where it is needed and mostly within the existing built environment, provides mitigation measures to minimise potential negative effects on environmental factors. Housing Policies set out guidance to help ensure that new homes are delivered that meet the specific needs for Dartmoor National Park – affordable, adaptable, rural workers – and overall this will have cumulative positive effects. Policies that recognise the specific characteristics of employment, including consideration of resilience to change, will have positive effects that could be cumulative.
- 6.112 Strong Policies to protect and enhance the Special Qualities of the National Park, including landscape, biodiversity, historic environment, and communities, provide mitigation measure to minimise potential negative effects from new development proposed in the Dartmoor Local Plan, including cumulative effects. However, the SA identified that there is a risk of adverse cumulative effects arising from the considerable new development being proposed around the boundary of the National Park through the Plymouth & SW JCS and the emerging GESP. This new development is likely to result in increased access and use of the National Park for recreation with potential negative effects, particularly on the wider biodiversity resource.
- 6.113 The DNPA will need to continue to use Duty to Cooperate and Statements of Common Ground to help ensure that appropriate mitigation measures are being developed to avoid or minimise cumulative negative effects arising from the pressures of adjacent new development.

### **Habitats Regulations Assessment (HRA)**

- 6.114 The emerging HRA findings have been incorporated into the SA process. The HRA screening process 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, specifically the Plymouth & SW JLP and the emerging GESP.
- 6.115 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 (Dartmoor, South Dartmoor Woods, and South Hams SACs) and this was investigated further through appropriate assessment (AA).

- 6.116 The appropriate assessment determined that the mitigation provided through the relevant DLP Policies such as Policy 2.2 Biodiversity; the small size, location and site-specific requirements of certain site allocations; and the requirements in the South Hams SPD, are sufficient to ensure that significant adverse impacts on air quality and habitat loss or fragmentation can be avoided, alone or in-combination with other plans. The assessment also concluded that these mitigation measures were sufficient to ensure that significant adverse impacts arising from recreational disturbance can be avoided for the Dartmoor Local Plan alone.
- 6.117 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 the Dartmoor, South Dartmoor Woods and the South Hams SACs from recreational disturbance.

### **Equality Impact Assessment (EqIA)**

- 6.118 The screening assessment has found that the DLP Regulation 18 consultation draft 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 emerging findings of the EqIA have been incorporated into the SA process.

## 7.0 SA OF DARTMOOR LOCAL PLAN Regulation 19

### Developing the Plan from Regulation 18 to Regulation 19

- 7.1 The Regulation 18 Draft DNP Local Plan was published for consultation from 3 December 2018 to 4 February 2019 on the DNPA's website<sup>108</sup>, accompanied by various evidence studies including the SA and HRA Reports (October 2018). The feedback from this consultation has been analysed and the comments made, together with ongoing technical studies, have informed the development of the next stage of plan-making – the Pre-Submission Regulation 19 Plan. An overview of responses to the Regulation 18 draft plan has been published<sup>109</sup>. Comments made on the earlier SA and HRA reports were also reviewed and taken into consideration in this next stage of appraisal.
- 7.2 Generally, there was positive support for the emerging draft Local Plan with many respondents commending the language and design; diagrammatical summaries were welcomed in particular. Some concern was expressed that strategic and non-strategic policies were not properly defined, and that the Authority's socio-economic duty was not given sufficient prominence. The Authority considered the comments received, further technical evidence and updated planning policy requirements in order to develop the Regulation 19 draft of the Local Plan.
- 7.3 The plan period has been extended to 2036 to ensure an appropriate period of time after adoption. Clarification has been provided regarding the definition of major development and Teign Village added to the Settlement Strategy. New Policies have been developed – one on protecting the water environment and one to better enable more sustainable transport. Further consideration has been given to issues for recreational impacts and net gain for biodiversity. Two existing site allocations at Mary Tavy have been saved and carried forward into the Regulation 19 Local Plan. A previous Proposal (Land at Brent Mill, South Brent) has been removed due to updated flood risk mapping from the Environment Agency.
- 7.4 Many of the amendments to the Local Plan are associated with updating, clarification, correction of typographical errors, and reformatting – these are minor changes that are not significant with regard to the previous SA findings. Certain amendments to the Local Plan, for example, the new Policies on the water environment and sustainable transport, expansion of Policy 2.2 on biodiversity, and the two site allocations carried over, are significant and need to be tested through SA. Those amendments to the Draft Plan that are considered to be significant for SA are summarised, as follows:

<sup>108</sup> <https://www.dartmoor.gov.uk/living-and-working/planning/planning-policy/local-plan-review>

<sup>109</sup> [https://www.dartmoor.gov.uk/\\_data/assets/pdf\\_file/0005/1548437/Local-Plan-Reg.-18-Consultation-Summary-April-2019.pdf](https://www.dartmoor.gov.uk/_data/assets/pdf_file/0005/1548437/Local-Plan-Reg.-18-Consultation-Summary-April-2019.pdf)

**Table 7.1 Summary of Draft Plan Changes that are Significant for the SA**

<b>Policy or Proposal</b>	<b>Summary of Key Changes</b>
Plan period	Extended from 2033 to 2036 to provide for planning 15 years after adoption & thus better enabling delivery of housing need.
SP1.5 Major Development	Substantial rewording to resolve confusion over definitions and reflect recent legal advice to National Parks.
SP1.7 Sustainable Construction	Rewording of Policy text to include requirements that development "...should minimise its impact on climate change..." rather than the previous encouragement of reducing carbon emissions. Additional parts 2 and 3 that require new development to achieve specific reductions or certain certifications. Additional information and explanation is provided in the supporting text.
SP2.2 Biodiversity	Comprehensive important additions/clarifications to the supporting text & additional requirements regarding internationally protected sites or species in the Policy text.
SP2.3 Biodiversity Net Gain	Additional information and clarification in supporting text. Clarification and specific requirements regarding delivery of 10% biodiversity net gain for certain developments by size or site area now provided in the Policy text.
P2.8 Enabling Development	Additional criterion to Policy explaining that planning conditions or a s106 agreement will be used to secure the future of a heritage asset – where necessary.
P2.9 Water Environment & Flood Risk	Earlier flood risk policy revised and incorporated into new Policy that recognises the requirements for flood risk management should be considered within the wider context of the whole water environment.
SP3.1 Meeting Housing Need	Clarification & additional explanation in supporting text. Clarification & rewording in Policy text including requirement for up-to-date housing needs assessment.
Communities, Services & Infrastructure Strategy	Additional statements protecting/enhancing access network & mitigating harmful recreational pressure on Dartmoor.
P4.3 Enabling Sustainable Transport	New Policy providing guidance to encourage sustainable transport; includes requirement that applications should be supported by appropriate level of transport assessment.
P4.4 Parking Standards	New criterion in Policy requiring all new parking areas to incorporate SuDS.
P4.6 Public car parks	New criterion in Policy requiring all new parking areas to incorporate SuDS.
SP4.9 the Access Network	Substantial new section on recreational impacts in the supporting text. New criterion in Policy requiring mitigation of any harmful recreational pressures on Dartmoor's Special Qualities.
Proposal 7.3 Longstone Cross	New section in supporting text explaining critical drainage in Ashburton and requirement for new development to reduce run-off rates.

	Additional section on Additional criterion requiring project level HRA to ensure no adverse impact on the South Hams SAC.
Site Proposals	Indicative numbers of houses have been included now.
Proposal 7.17 Land at Brent Mill, S Brent	Deleted due to updated flood risk mapping from the Environment Agency.
	Please note that subsequent Proposals & Policies have been renumbered sequentially through to 7.24 to accommodate the deletion of the previous 7.17 (Land at Brent Mill, South Brent). The Land at Station Yard is now numbered 7.17
P7.22 Land off Warren Road	New Proposal with 1.4 hectares allocated in Mary Tavy for a new village primary school.
P7.23 Land in Mary Tavy	New Proposal with 2 sites allocated for mixed-use development – existing allocation & part-developed.
P7.24 S Zeal Conservation Area	The burgage plots are specifically mentioned in Policy text.

- 7.5 The earlier SA of the emerging Regulation draft DLP had made a small number of suggestions for improving the sustainability of certain draft policies. These were incorporated into the development of the draft Plan and demonstrate how the SA has helped to inform and influence plan-making, where possible.

### **Representations to the Initial SA Report (January 2018) and Regulation 18 SA Report (September 2018)**

- 7.6 No comments were received on the Initial SA Report. Few comments were received on the Regulation 18 SA & HRA Reports, including from the statutory environmental regulators. No comments were received on the Equality Impact Assessment (EqIA, Appendix VI in the SA Report). The Environment Agency (EA) had some comments on the draft Policies but no specific comments on the SA or HRA. Historic England (HisE) and Devon County Council did not have any comments on the SA at this stage. Comments received with outline responses are provided in this SA Report in Appendix VII.
- 7.7 Natural England had various comments on the draft Policies with suggestions for plan-making. There were no other specific comments for the SA. NE further advised that they had no detailed comments at this stage on the HRA but indicated that the recreational disturbance issue is a particular concern. NE advised that they are not clear about a solution at this time. NE had no specific comments on the HRA and the proposed site allocation Proposals & Policies. Teignbridge District Council (TDC) made some suggestions for site-specific requirements for one allocated site in Ashburton and one site in Buckfastleigh with potential implications for the HRA and appropriate assessment (AA). Summary findings from the updating to the HRA & AA Report are incorporated into this SA Report.

## SA of Plan Changes

- 7.8 **Plan Period to 2036:** Extending the Plan period from 2033 to 2036 provides more certainty of planning guidance and delivery of housing needs, including affordable housing. This further confirms the likely major positive effects on SA objectives for housing.
- 7.9 **SP1.5 Major Development:** The new supporting text provides comprehensive explanation and guidance on what constitutes major development within the context of a National Park; a clear definition is also now provided to resolve any confusion. The Policy text has been revised and expanded to explain that applications should include assessments of need, impacts on local economy, cost/scope for meeting need in some other way, and any detrimental effect on Dartmoor's Special Qualities. This clarification and requirement for assessments should support other Plan Policies that protect and enhance environmental and community factors.
- 7.10 **SP1.7 Sustainable Construction:** The new supporting text explains the reasoning for the changes to the policy that seek to maximise the building performance that can be achieved by requiring an improvement in efficiencies above current building regulation standards. The additions to policy include a new part 2 that sets out that new development must achieve either a minimum of 10% reduction in carbon emissions over Building Regulations Part L 2013, OR certification with the Association for Environment Conscious Building (AECB) or Passivhaus. This is significant with regard to the previous findings of the SA that had identified likely positive effects for SA Objective No 2 with regard to increasing the quality of design/construction. The changes to policy that require at least 10% reduction in carbon emissions over Building Regulations Part L increase the likely positive effects; the additional part 3 sets out how developers should demonstrate their compliance with the requirements in part 2. This confirms that the mitigation measures contributing towards reducing the effects of climate change will be implemented – providing certainty of positive effects. Overall, likely major positive effects with regard to sustainable construction – energy efficiency and reduction in carbon emissions – and these effects will be cumulative in the longer term.
- 7.11 **SP2.2 Conserving & enhancing Dartmoor's Biodiversity & Geodiversity:** the supporting text includes a new sentence making explicit that where a proposal is likely to have a significant effect on an internationally protected site, a project level HRA will be required. A new section on the South Hams Special Area of conservation (SAC) is provided with information on Greater Horseshoe Bats (GHBs) and their requirements, including roosts, foraging habitats and commuting routes. The linkage with disturbance on the GHBs from increased recreational pressures on Dartmoor is further explained in new supporting text and reference is made to Policy 4.9 The Access Network. Revisions to Policy text make explicit that development must conserve and enhance biodiversity. Additional text is provided for criterion 3b regarding compensatory measures and requirements to maintain the species population at favourable conservation status in its natural range.

- 7.12 The additional information provides stronger guidance for development and makes explicit that a project level HRA may be required. This should better confirm implementation of mitigation measures to help ensure that there will not be adverse effects on the integrity of the Dartmoor SACs. The updated HRA Report (June 2019) confirmed that the Draft DLP Pre-Submission is unlikely to have Likely Significant Effects (LSEs) for air quality changes, changes to water quality or levels, or habitat loss/fragmentation – alone or in-combination with other plans. Whilst the DLP will not have LSEs alone from recreational disturbance, new evidence<sup>110</sup> indicates that there is some uncertainty regarding in-combination effects on the integrity of the Dartmoor, South Dartmoor Woods and the South Hams SACs from recreational disturbance arising from new development planned outside the Dartmoor Park boundary. It will be for these plans and new development to ensure that there are no adverse effects on the integrity of the SACs, including in-combination with the DNPLP.
- 7.13 **SP4.9 The Access Network:** The Policy has a new criterion 3 advising that development within or outside the National Park and likely to increase harmful recreational pressure on Dartmoor's Special Qualities, particularly biodiversity, cultural heritage and the access network, must be appropriately mitigated. The supporting text includes a new section on recreational impacts that provides explanation and confirms that since development and population increase will occur mainly outside the National Park, such mitigation measures will need strong cross-boundary co-operation with neighbouring local planning authorities and government organisations. This strengthening of Policy, including commitments to continuing with cross-boundary working, should reassure that appropriate mitigation measures are in place to ensure that there are no adverse effects, alone or in-combination, on the integrity of the SACs, and wider biodiversity network.
- 7.14 **SP2.3 Biodiversity Net Gain:** The Policy now makes explicit the requirement for net gain in biodiversity and clearly sets out the thresholds of development size/area at which development is required to deliver 10% net gain; all development will still be expected to make a proportionate on-site contribution, in accordance with the thresholds set out in the supporting text. The new criterion 1 in Policy also makes explicit the connection between biodiversity and other environmental gains including soil, water and air quality, natural flood management, carbon sequestration and pollination. Making clear the inter-relationships between such environmental factors should also promote more synergistic and positive cumulative effects from the Plan in the longer term.
- 7.15 **P2.8 Enabling Development:** The additional criterion explaining that, where necessary, planning conditions or a s106 agreement will be used to secure the future of a heritage asset. This confirms that mitigation measures will be implemented and delivered, confirming effectiveness to minimise any likely negative effects towards neutral.

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<sup>110</sup> SWEEP for DNPA (August 2018) Population Futures & Dartmoor National Park Implications of development around the outskirts of Dartmoor for recreational use and management of access

- 7.16 **P2.9: Water Environment & Flood Risk:** New supporting text explains the role of the water environment in shaping the characteristics of Dartmoor. It also makes explicit reference to the inter-relationships between water, soil, biodiversity and flood risk, explaining that enhancements to the water environment will be taken into consideration when seeking biodiversity net gain as part of Policy 2.3. This revision into a new policy should ensure that strong mitigation measures are in place and help promote more synergistic and positive cumulative effects on the water environment from the Plan in the longer term.
- 7.17 **SP3.1 Meeting Housing Need:** The clarification and rewording in the policy includes requirement for up-to-date housing needs assessment. This should help ensure that the major positive effects indicated for the SA objectives on housing are maintained throughout the lifetime of the Plan.
- 7.18 **Communities, Services & Infrastructure Strategy:** The additional statements protecting/enhancing the access network and mitigating harmful recreational pressure on Dartmoor provide a stronger framework for the policies in this section 4 of the Plan. This clarifies and makes explicit that the DNPA will protect the access network and require any negative effects from increased recreational pressures to be mitigated. This confirms that mitigation measures are in place and will be implemented.
- 7.19 **P4.3 Enabling Sustainable Transport:** This new policy provides guidance to encourage sustainable transport – walking, cycling and sustainable transport routes. It requires development to support a network that is safe and with good connections to local services and facilities. It includes requirement that applications should be supported by an appropriate level of transport assessment. The supporting text explains how the appropriate level of assessment will be decided by the DNPA on a case by case basis taking into consideration the scale of the proposed development, existing transport, environmental sensitivity, and types of impacts to assess including cumulative.
- 7.20 The previous SA had suggested that an earlier draft of this policy should require all development to encourage sustainable transport (not just development that affects the network) and this has been progressed in this revised new policy. The specific requirement for a transport assessment, supported by the clear explanation of how an appropriate level of assessment will be determined, will help ensure that effects on SA objectives Nos 13 & 14 are identified at the project and area levels. This will better enable mitigation measures to be evaluated, confirming at least the neutral effects found by the earlier SA. Through the policy encouragement to enhance sustainable transport, there is the potential for minor positive effects – that could be synergistic and cumulative in the longer term.

**SA suggestion:** The linkages with green infrastructure and SP2.3 biodiversity net gain could be made explicit. For example, SP2.3 refers to the potential for other environmental gains but does not specifically mention sustainable transport.

- 7.21 **P4.4 & P4.6 Parking:** The addition of a criterion in each of these Policies that requires all new parking areas to incorporate sustainable drainage (SuDS) will contribute further to ensuring that mitigation measures are implemented. This confirms the likely neutral effects identified for the SA objectives Nos 6 & 7 on the water environment.
- 7.22 **Proposal 7.3 Land at Longstone Cross, Ashburton:** The supporting text now includes an additional paragraph explaining how much of Ashburton is designated as a critical drainage area with issues for cumulative impacts of surfacewater run-off. New development will be required to reduce current run-off rates using SuDS infiltration as far as practicable. This will help to resolve an existing sustainability problem with the potential for minor positive effects on SA objective No 7 in this area.
- 7.23 The Policy text includes a new criterion requiring applications to be supported by evidence to inform an appropriate assessment (project level HRA) to ensure that development will have no adverse impact on the South Hams SAC. Such a requirement is the same as has been specified for the other proposal 7.4 in Ashburton - Land at Chuley Road, and the two proposals 7.5 & 7.6 in Buckfastleigh – providing consistency and ensuring that mitigation measures are in place to protect the integrity of the protected site, alone or in-combination.
- 7.24 **Proposals 7.14 Land at Palstone Lane (a); 7.15 Land at Palstone Lane (b); & Land at Fairfield, South Brent:** The South Brent site allocations are not within the sustenance zones for the Greater Horseshoe Bat but are within the Landscape Connectivity Zones (HRA Report, June 2019). Taking into account the precautionary principle and further advice from Natural England, the DNPA has also now included requirements for a project level HRA to establish no adverse impact on the South Hams SAC from the South Brent site allocations. This further provides consistency and ensures that mitigation measures are in place to protect the integrity of the protected site, alone or in-combination.
- 7.25 **Proposal 7.23 Land off Warren Road & 7.24 Land in Mary Tavy:** These new proposals of 7.23 with 1.4 hectares for a new village primary school and 7.24 comprising 2 sites totalling 0.5 hectares for mixed use development are existing allocations as set out in the adopted Dartmoor Development Management & Delivery Development Plan Document<sup>111</sup>. Part of the existing Proposal MTV2 has been developed and the other two parts are being reallocated to provide certainty and continuity. This will contribute to the major positive effects indicated by the earlier SA for provision of identified local housing need.
- 7.26 **Policy 7.25 South Zeal Conservation Area:** The burgage plots are specifically mentioned in Policy text and this additional clarification will help ensure that these historic environmental assets and their setting will be protected - confirming that mitigation measures are in place for likely neutral residual effects on SA objective No 4.

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<sup>111</sup> <https://www.dartmoor.gov.uk/living-and-working/planning/planning-policy/local-plan>

## **Interrelationships Between Topics & Cumulative Effects**

- 7.27 As explained in the previous SA Report (and see paragraph 5.100), all topics are closely inter-related for the assessment of sustainable development for the National Park. The landscape, biodiversity, cultural/heritage environment, and character and health of people/communities all have formed and continue to contribute to the Special Qualities that attract residents and visitors. The protection and enhancement of such attributes has further effects on the economy, especially for recreation, tourism and farming/land-based activities.
- 7.28 The likely positive cumulative effects previously identified for housing, communities and including resilience to change are retained and strengthened through the amendments to the Policies. The Policies to protect and enhance the Special Qualities of the National Park, including landscape, biodiversity, historic environment, and communities, have been clarified and strengthened – confirming that mitigation measures are in place to resolve potential negative effects, including cumulative effects.
- 7.29 The earlier SA had identified that there is a risk of adverse cumulative effects arising from the considerable new development being proposed around the boundary of the National Park through the Plymouth & SW JLP and the emerging GESP. This new development is likely to result in increased access and use of the National Park for recreation with potential negative effects, particularly on the wider biodiversity resource. Policy SP2.2 now includes specific explanation regarding recreational impacts in the policy supporting text. This makes clear that recreational impacts from development within or outside the National Park must be appropriately mitigated. Additional text in the Policy itself makes explicit that the integrity of internationally designated sites must be maintained, further strengthening that mitigation measures are in place to support the conclusion of the HRA/AA. The DNPA will continue to use Duty to Cooperate and Statements of Common Ground to help ensure that appropriate mitigation measures are being developed to avoid or minimise cumulative negative effects arising from the pressures of adjacent new development.

## **Habitats Regulations Assessment & Equality Impact Assessment**

- 7.30 The HRA screening and appropriate assessment were updated to take account of the changes to the Draft Plan, particularly with regard to the strengthening of Policy 2.2 and additional requirements for certain site Proposals in South Brent. The conclusions of the appropriate assessment were confirmed – that there are mitigation measures in place to ensure that there are no likely significant effects, alone or in-combination with other plans, on the integrity of the designated sites. However, recent evidence suggests that there is some uncertainty regarding in-combination effects on the integrity of the Dartmoor, South Dartmoor Woods and the South Hams SACs from recreational disturbance arising from new development planned outside the Dartmoor Park boundary. It will be for these plans and new development to ensure that there are no adverse effects on the integrity of the SACs, including in-combination with the DNPLP.

- 7.31 No comments were received on the previous EqlA and in regard to the changes made to the Plan, there was no updating required. The Plan is unlikely to have negative effects on protected characteristics or persons identified under the Equality Act 2010 and as a result a full EqlA will not be required.

## 8.0 MONITORING PROPOSALS

- 8.1 The SEA Directive and Regulations require that the significant effects (positive and negative) of implementing the plan should be monitored in order to identify at an early stage any unforeseen effects and to be able to take appropriate remedial action. Government guidance<sup>112</sup> on SA/SEA advises that existing monitoring arrangements should be used where possible in order to avoid duplication. Government requires local planning authorities to produce Monitoring Reports (MRs), and the Dartmoor Local Plan Monitoring Report<sup>113</sup> (produced annually) is considered sufficient to ensure appropriate monitoring takes place. The DNPA also monitors the success of the Management Plan and produces a State of the Park Report<sup>114</sup>.
- 8.2 The SA Scoping Report Frameworks set out how indicators align with issues and objectives for sustainable development for the Dartmoor National Park area. These will be reviewed at each stage of the SA and consultation as the plan-making and the SA processes progress. The EqlA (Appendix VI of this SA Report) noted that Devon County Council produces annual reports on equality in the county. Taking this into account with the monitoring undertaken by the DNPA, the EqlA concluded that further monitoring regarding equality and diversity is not considered to be required.

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<sup>112</sup> [http://planningguidance.planningportal.gov.uk/?post\\_type=&s=sustainability+appraisal](http://planningguidance.planningportal.gov.uk/?post_type=&s=sustainability+appraisal)

<sup>113</sup> [http://www.dartmoor.gov.uk/\\_data/assets/pdf\\_file/0008/1007486/AMR-2016-17.pdf](http://www.dartmoor.gov.uk/_data/assets/pdf_file/0008/1007486/AMR-2016-17.pdf)

<sup>114</sup> <http://www.yourdartmoor.org/delivering/measuring>

## 9.0 CONCLUSIONS, CONSULTATION & NEXT STEPS

- 9.1 The SA has helped identify and refine alternatives and investigated the four options for the Spatial Strategy approach for the Dartmoor Local Plan. A comparative assessment was undertaken and the outline reasons for selection/rejection of strategic options is provided. All reasonable options for site proposals have been tested through SA.
- 9.2 The Policies and Proposals in the draft Dartmoor Local Plan have been investigated through SA and emerging findings have informed plan preparation. 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.
- 9.3 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 the boundary of the Park. It is considered that there could be risks for cumulative negative effects on both 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.
- 9.4 Comments made on the Regulation 18 Draft Plan have been considered in developing the Regulation 19 Pre-Submission Plan. The significance of the changes for the previous SA findings has been identified and the implications for the SA tested and discussed. Overall, the refinements to the Plan have strengthened the positive effects identified and strengthened the mitigation measures in policies to avoid/minimise negative effects. The potential for cumulative negative effects through recreational impacts arising from new development outside the National Park remains. However, the DNPA has stated its commitment to continuing to liaise with relevant local planning authorities and Natural England. Thus, mitigation measures are in place.
- 9.5 The Regulation 19 draft Plan and supporting evidence, including this SA Report and the HRA/AA Report, will be submitted to the Secretary of State. Any representations made on the draft plan and the SA, HRA/AA will also be provided to the Inspector to be appointed in due course to examine the draft Plan and evidence for soundness and justification.