

# DARTMOOR NATIONAL PARK AUTHORITY LOCAL PLAN REVIEW

## SUSTAINABILITY APPRAISAL (SA)

(incorporating Strategic Environmental Assessment, Health Impact Assessment, and Equalities Impact Assessment)

Initial SA Report December 2017



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### **Initial SA Report**

date:	October 2017 v01 DRAFT			
	November 2017 v02 Draft			
	December 2017 v03 Final	December 2017 v03 Final		
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#### 1.0 INTRODUCTION

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

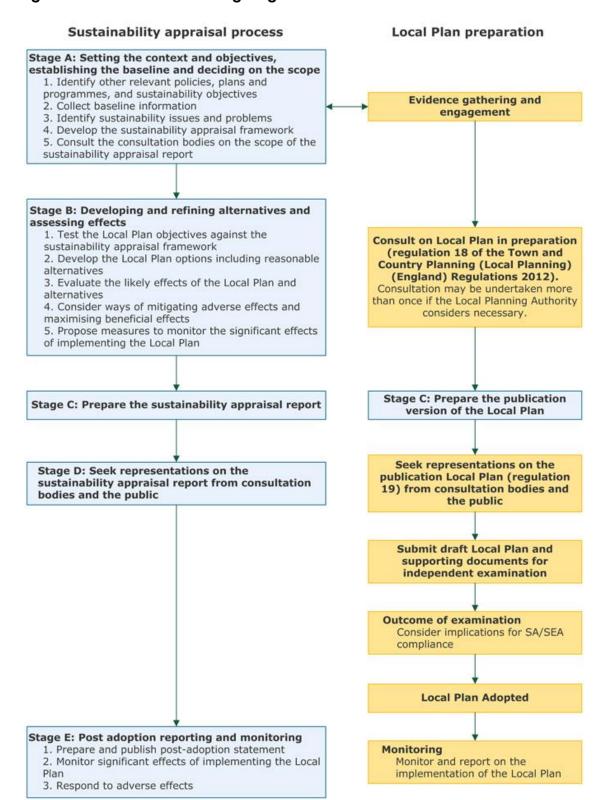
- 1.1 Sustainability Appraisal (SA) is a systematic process that must be carried out during the preparation of a Local Plan. The purpose of a Sustainability Appraisal is to promote sustainable development through assessing the extent to which an emerging plan, when judged against reasonable alternatives, 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 165 of the National Planning Policy Framework (NPPF). Extant guidance<sup>2</sup> recommends that SA incorporates the requirements for Strategic Environmental Assessment (SEA) set out in the Environmental Assessment of Plans and Programmes Regulations 2004, which implements the requirements of the EU SEA Directive<sup>3</sup>. 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 planmaking; 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 will be undertaken in parallel to the SA, the detailed method and findings will be reported separately and the findings of the HRA will inform the SA.
- 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

<sup>&</sup>lt;sup>1</sup> DCLG (2014) National Planning Practice Guidance - Strategic Environmental Assessment and Sustainability Appraisal <a href="http://planningguidance.planningportal.gov.uk/blog/guidance/">http://planningguidance.planningportal.gov.uk/blog/guidance/</a>

<sup>&</sup>lt;sup>3</sup> EU Directive 2001/42/EC

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. The draft SA Scoping Report was sent to the statutory environmental bodies Environment Agency, Historic England & 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.
- 1.7 The next stage of the SA process is concerned with developing and refining alternatives and assessing effects (Stage B). This Initial SA Report provides information on the scoping and methods used in the process. It focuses 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 Dartmoor Local Plan Review

- 1.8 Dartmoor National Park Authority is undertaking a review<sup>4</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 waste and minerals policies as the National Park is not included in the Devon County Waste & Minerals Plan.
- 1.9 Fundamental to the review of the Local Plan are the two statutory<sup>5</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:

<sup>&</sup>lt;sup>4</sup> http://www.dartmoor.gov.uk/living-and-working/planning/planning-policy/local-plan-review

<sup>&</sup>lt;sup>5</sup> National Parks & Access to the Countryside Action 1949 as amended by the Environment Act 1995



Figure 1.2: Location of Dartmoor National Park<sup>6</sup>

- 1.10 A first consultation for the Local Plan Review has been 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) summarises the written responses received and notes of meetings and drop in events held during the consultation period.
- 1.11 The DNPA has 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 will be available on the Authority's website for people to

<sup>&</sup>lt;sup>6</sup> Dartmoor National Park Authority

<sup>&</sup>lt;sup>7</sup> http://www.dartmoor.gov.uk/living-and-working/planning/planning-policy/local-plan-review

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 this Initial SA Report.

- 1.12 At the same time, the DNPA is continuing to collect evidence including the Land Availability Assessment (LAA)<sup>8</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 is now discussing 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 will be tested through SA in line with the requirements of the SEA Regulations (and as explained later in this Initial SA Report in Section 4).
- 1.13 The Dartmoor Local Plan Regulation 18 draft will comprise a Vision and Strategic Objectives, Core, Strategic and Development Management Policies organised within themes appropriate to planning and caring for the National Park. It will also include proposed site allocations for housing and employment land. Comments received on the Vision & Spatial Strategy Paper and at the discussion meetings with local communities will be taken into account to prepare this next draft of the Local Plan. The findings of the SA and HRA will also be taken into consideration, together with other technical evidence.

#### Consultation

- 1.14 The DNPA has consulted widely throughout the early preparation of the Local Plan Review, including through their website<sup>9</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>10</sup>.
- 1.15 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).
- 1.16 The SA & 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 will accompany the subsequent

19 Issues Consultation Response Summary V2.pdf

<sup>&</sup>lt;sup>8</sup> <a href="http://www.dartmoor.gov.uk/living-and-working/planning/planning-policy/background-evidence/land-availability-assessment-shlaa">http://www.dartmoor.gov.uk/living-and-working/planning/planning-policy/background-evidence/land-availability-assessment-shlaa</a>

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

<sup>&</sup>lt;sup>10</sup> http://www.dartmoor.gov.uk/\_\_data/assets/pdf\_file/0009/957150/2017-04-

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

Dartmoor Local Plan Review Stage	SA/SEA Stage and Documents
and Documents Consultation	Consultation
Initial Evidence Gathering	
& Technical Studies	
Ongoing	
Issues Paper	
Consultation:	
3 October 2016 – 13 January 2017	
Issues Consultation Report	
(April 2017)	
	SA/SEA Scoping Report (August 2017)
	& HRA Screening Report (July 2017)
	Consultation: August-September 2017
	Final SA/SEA Scoping Report
On an Marchines with Dordal O Tayon	(October 2017)
Open Meetings with Parish & Town Councils	
October-November 2017 Vision & Spatial Strategy Paper	Initial SA Report (November 2017)
(4 Strategic Options considered)	(including SA of the 4 Strategic Options
Available on the DNPA website for	& SA of Site Options)
comment	Available on the DNPA website for
	comment
Draft Local Plan (Regulation 18)	SA Report & HRA Report
Consultation:	Consultation:
TBC summer 2018	TBC summer 2018
Pre-Submission Local Plan	Pre-Submission SA Report & HRA Report
(Regulation 19)	Consultation:
Consultation:	
TBC spring 2019	TBC spring 2019
Submission & Examination	Submission & Examination
TBC 2018-19	TBC 2018-19
Local Plan Adoption	SA Adoption Statement

#### Compliance with the Requirements of the EU SEA Directive

1.17 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 Initial SA Report presents the initial SA/SEA testing of early elements of the emerging new Local Plan. The next stage of SA/SEA will be presented in the SA Report that accompanies the Regulation 18 Draft Plan. It will include an appendix that clearly signposts the requirements for reporting the SEA and it will include a Non-Technical Summary.

#### Purpose & Structure of this Initial SA Report

- 1.18 This document reports the initial stages of 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 summaries the findings of the SA of the draft Vision strategic options investigated for the Spatial Strategy
  - Section 6 provides outline conclusions from the initial SA, sets out the requirements for consultation and commenting on the report, and explains the next steps.
- 1.19 Technical Appendices provide the detailed findings of the SA. Appendix I details the compatibility analysis for the draft Plan Vision. Appendix II details the SA of the four options for the Spatial Strategy.
- 1.20 The HRA Screening Report (July 2017) identified those internationally designated areas for important biodiversity that should be scoped into the assessment. The HRA will be undertaken at the next stage of plan-making, considering possible site allocations and draft policies. The findings of the HRA will be presented in a report that will accompany the draft Plan (Regulation 18) on consultation and this is likely to be in the summer 2018. The findings of the HRA will be summarised and taken into consideration in the next SA/SEA the report will also accompany the draft Plan on consultation. The EqIA will be undertaken at this stage of plan-making; details will be provided in a technical appendix to the SA Report and also available as a separate report to clearly demonstrate compliance with the Equality Act, 2010.

#### 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 (2012) in paragraph 167 that states that "Assessments should be proportionate and should not repeat policy assessment that has already been undertaken."
- 2.3 This SA is an Integrated Appraisal that has incorporated the requirements of the EU SEA Directive. It will integrate 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 will also be 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 Initial SA Report.
- 2.5 The SA Framework provides the basis by which the sustainability effects of the Dartmoor Local Plan Review will be 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 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 consultation on the draft SA Scoping Report (August 2017) and as a result of comments received, 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. 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

Key: Categories of Significance				
Symbol	Meaning	Sustainability Effect		
	Major Negative	Problematical and improbable because of known sustainability issues; mitigation likely to be difficult and/or expensive		
-	Minor negative	Potential sustainability issues: mitigation and/or negotiation possible		
+	Minor positive	No sustainability constraints and development acceptable		
++	Major Positive	Development encouraged as would resolve existing sustainability problem		
?	Uncertain	Uncertain or Unknown Effects		
0	Neutral	Neutral effect		
N/A	Not Applicable			

Some factors may have two symbols. SA 1: First symbol landscape, second symbol settlement character; SA 3 first symbol biodiversity, second Green Infrastructure; SA 5: First symbol soil, second symbol relates t minerals; SA 6 first water resources, second water quality; SA 11: First symbol open space, second green infrastructure.

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>11</sup>
Theme: Landscape and Settlement Character SEA Directive Topic(s): Landscape NPPF Paragraphs: 109-125			
<ul> <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</li> </ul>	1. To conserve and enhance the landscape and settlement character of Dartmoor National Park	<ul> <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
<ul> <li>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>	2. To conserve & enhance the character, safety, accessibility, adaptability, and sustainability, including energy	<ul> <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

<sup>&</sup>lt;sup>11</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

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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.	efficiency, of the built environment by raising the quality of design and construction	sustainable management of resources <sup>12</sup> Enhance the distinctiveness & diversity of the local built environment and community spaces?  Promote a high standard of access and adaptability?	as BRE Home Quality Mark
Theme: Biodiversity, Geodiversity and Green Infr SEA Directive Topic(s): Biodiversity, Flora and Fauna NPPF Paragraphs: 109-125  Dartmoor has internationally, nationally and locally designated biodiversity and geodiversity	3. To protect, enhance and manage biodiversity	Have any effects on internationally or nationally	Number of SACs & SSSIs in favourable or unfavourable condition
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.  Managing access so that designated sites,	and geodiversity for net gain, where possible <sup>13</sup>	designated biodiversity or geodiversity?  Have any effects on local biodiversity or geodiversity?	Area of new BAP habitats created/restored
priority habitat and priority species are not negatively affected by recreational activities.  Encouraging sustainable farming practises, and engaging farmers to ensure agricultural methods and development arising from		<ul> <li>Contribute to enhancement of the Green Infrastructure network</li> <li>Contribute to enhanced understanding through</li> </ul>	Proportion of Local Wildlife Sites where positive conservation management is being implemented
<ul> <li>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>		provision of further studies/surveys  Enable good farming practice  Enable good woodland management	Contributions towards aims for GI Strategies

<sup>&</sup>lt;sup>12</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

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<sup>&</sup>lt;sup>13</sup> DCLG NPPF (2012) paragraphs 9 and 11 refer

recovering' condition, with an aim to improve sites which are currently in an 'unfavourable' condition.  Need to ensure that development does not result in the loss or damage of key habitats and wildlife.  Climate change will threaten Dartmoor's varied habitats and wide range of species.  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.  Ensuring forestry activities are sustainable and do not degrade or result in the loss of key habitats or biodiversity.  Theme: Historic Environment  SEA Directive Topic(s): Cultural Heritage			
<ul> <li>NPPF Paragraphs: 126-141</li> <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>	4. To protect, conserve, and enhance the historic environment and its setting	<ul> <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>	Number of Listed Buildings Number of heritage assets on the 'At Risk' register Conservation Area enhancement projects Restoration of archaeological assets Archaeological surveys conducted

<ul> <li>Avoid the character of designated         Conservation Areas being affected from poorly         designed new development and modifications         to vernacular buildings.</li> <li>Theme: Soils, Land &amp; Minerals         SEA Directive Topic(s): Soil</li> </ul>			
<ul> <li>NPPF Paragraphs: 79-92, 109-125</li> <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>	5. To protect and conserve soil, land and minerals	<ul> <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
Theme: Water - Resources, Quality and Flooding SEA Directive Topic(s): Water NPPF Paragraphs: 99-125	1		
<ul> <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> </ul>	6. To promote efficient water use and improve water quality	<ul> <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
<ul> <li>Investigate opportunities to manage flood risk in upper catchments through changed habitats and land use practices</li> </ul>	7. To reduce the risk of flooding from all sources and	<ul> <li>Propose development in the flood plain, Critical Drainage Area, or put properties at risk</li> </ul>	Number of planning permissions granted contrary to EA advice

	manage flood risk more sustainably	of flooding?  Provide opportunities for addressing flood risk?  Promote sustainable urban drainage systems (SUDs)?  Provide any opportunities for progressing more sustainable management of habitats and flood risk management in upper catchments (resolving existing problems)?	
<ul> <li>Theme: Communities</li> <li>SEA Directive Topic(s): Population and Human Health NPPF Paragraphs: 47-78</li> <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</li> </ul>	8. To maintain and enhance community and settlement identities distinctive to Dartmoor	<ul> <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
to inappropriate uses.  Cooperation needed where settlements adjoin or are split between Local Planning Authority areas, including Ashburton, Buckfastleigh, Cheriton Bishop and Yelverton.  New development should be focussed in areas that are the most sustainable and have the	9. To support the provision & accessibility of services & facilities 14?	<ul> <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

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

capacity for change.			
<b>Theme: Housing</b> SEA Directive Topic(s): Population and Human Health NPPF Paragraphs: 47-78	٦		
<ul> <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>	10. To ensure that the housing needs of all National Park residents are met	<ul> <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
Theme: Health and Equalities SEA Directive Topic(s): Population and Human Health NPPF Paragraphs: 69-78	١		
<ul> <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> <li>Promoting access and use of the National Park for different ethnic groups – national issue.</li> </ul>	11. To improve the health and wellbeing of communities and reduce inequalities	<ul> <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>15</sup>?</li> <li>Promote access &amp; use of the National Park for different</li> </ul>	Indices of Deprivation Public Open Space Provision per settlement Number of leisure facilities available Green Infrastructure categories and mapping

 $<sup>^{15}</sup>$  Please note that encouraging healthy lifestyles through sustainable transport is addressed in the theme following on Transport & Movement

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ethnic groups? Ensuring that disabled people can access and use the National Park. Promote access & use of the National Park for disabled Higher levels of fuel poverty than the national people? average. Regional differences in equality, including education and life expectancy discrepancies. Theme: Economy and Employment SEA Directive Topic(s): Population and Human Health NPPF Paragraphs: 18-22 12. To promote and **VAT** registrations Aging population and therefore a decreasing Promote & support key areas support the Business turnover & number proportion of those who are economically of tourism, leisure/recreation, economy, of employees active - (also national issue). agriculture/forestry, or small especially key Number of claimants on job businesses appropriate to Net out-commuting for work, which may business sectors of seekers allowance character of Dartmoor? increase as peripheral towns and cities grow. tourism, agriculture, Proportion of working age Promote flexibility, including Relatively low wages and high house prices leisure/recreation population in full-time home-working? which may deter/prohibit young workers living employment and small businesses Encourage the use of local in the National Park. Broadband access products and services? Almost half of businesses are small or micro, and there is a high level of self-employment, with Maintain progress with faster relatively small demand for new floorspace broadband & mobile space forecast. technologies appropriate for the character of the National Existing employment land and business units are Park? poor to medium quality and small scale, with limited appetite for investment or speculative builds. Relatively high employment in agriculture, but this is forecast to fall while other sectors (construction, businesses services, accommodation and food) are forecast to grow

20-30% of employment is in tourism, with largescale expenditure in the local economy by

tourists

<ul> <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> <li>Theme: Transport and Movement; Air Quality<sup>16</sup> SEA Directive Topic(s): Population and Human Health</li> </ul>			
<ul> <li>NPPF Paragraphs: 29-41</li> <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>	13. To help reduce congestion, particularly on the outskirts of National Park, and reduce associated indirect impacts on air quality and greenhouse gas emissions	<ul> <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> <li>Ensuring that new development is in accessible locations that minimises the need to travel by private vehicle</li> <li>Promoting sustainable transport in the National Park, improving existing public transport &amp; supporting cycling and walking routes.</li> </ul>	14. To encourage a change to sustainable transport modes and to reduce the need to travel	<ul> <li>Improve access to, and quality of, sustainable transport modes?</li> <li>Provide opportunities to enhance the cycling &amp; footpath network?</li> </ul>	Public transport routes & use PRoWs Increase in cycleways & footpaths PRoW which are 'easy' to use

<sup>&</sup>lt;sup>16</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.

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- Reduce levels of atmospheric pollution, specifically NO<sub>2</sub> emissions.
- Promote working from home for rural communities to help ease congestion on busy A roads.
- Invest in Public Rights of Way (PRoW) network to address declining number of PRoW that are categorised as in 'easy to use' condition.

 Encourage a reduction in the need to travel by car

#### Theme: Energy & Climate Change

SEA Directive Topic(s): Climatic Factors NPPF Paragraphs: 93-104

- Reducing energy consumption, with a focus on transport which accounts for almost 50% of the National Park's energy consumption.
- Increasing the energy efficiency of older dwellings, and ensuring new buildings have high energy efficiency standards.
- Promoting sustainable transport such as walking, cycling and public transport.
- Mitigating against Climate Change effects, including flood risk and damage to local habitats and wildlife.
- Adapting to the effects of Climate Change through appropriate design, appropriate siting of development, and considering the availability of water resources.
- Constraints of national standards for energy whilst the National Park may wish to promote higher sustainability standards.

The promotion of public transport and the reduction of private vehicle use is addressed in SA Objective No 12 Transport & Movement.

Improving energy efficiency in development is addressed in SA Objective No 1 Landscape & Settlement Character.

Flood risk & climate change mitigation is considered in the SA Objectives Nos 6 & 7 Water – Resources & Quality; Flooding.

Theme: Waste

SEA Directive Topic(s): Material Assets

NPPF Paragraphs: 5, 142-149

-	Promote recycling, reuse and composting to	<b>15.</b> To reduce waste	Reduce waste?	% waste reused/recycled
	improve sustainable waste management.	& promote reuse	Promote reuse, recycling or	
•	Ensure new developments have appropriate storage for recycling boxes/bins.	and recycling	composting?	
-	Avoid inappropriate waste management or			
	waste disposal facilities in the National Park			

#### 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	
Theme: Landscape and SEA Directive Topic(s): Lan NPPF Paragraphs: 109-125  1. To conserve and enhance the landscape and settlement character of Dartmoor National Park	Settlement Character dscape	<ul> <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>	<ul> <li>Development will restore and enhance currently degraded landscapes or Valued Attributes, and/or address an existing settlement character issue, with a major positive effect.</li> <li>Development will increase tranquillity, reduce light pollution, will positively enhance the landscape. Development will positively contribute to the existing character of the settlement.</li> <li>Development will not enhance or degrade the landscape of the National Park or the settlement character/townscape, with a</li> </ul>	
change (land use change, equestrian use, building conversions) on the landscape?  Contribute to the wild,		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		

	remote & tranquil characteristics of Dartmoor, including minimising light and noise pollution?		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
2. 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> <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>17</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>		out of the SA site assessments as all site options have ainable design and energy efficiency in accordance of the Design Guidance.
Theme: Biodiversity, Geo SEA Directive Topic(s): Biod NPPF Paragraphs: 109-125		ture:	

<sup>&</sup>lt;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

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3. To protect, enhance and manage biodiversity & geodiversity for net gain, where possible  Theme: Historic Environi SEA Directive Topic (s): Cul		<ul> <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> <li>Natural England Site Information</li> </ul>	++ 0 ? 	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.  No negative effect on biodiversity or geodiversity, and has the opportunity to provide enhancements to biodiversity and green infrastructure with a minor positive effect.  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.
NPPF Paragraphs: 126-141	Tordi Hemage			
4. To protect, conserve, and enhance the historic environment and its setting	Protect, conserve & enhance designated and non-designated heritage assets and their settings?	<ul><li>Magic Map</li><li>DNPA GIS Layers</li><li>Historic Environment Paper (2017)</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

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	<ul> <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>	<ul> <li>At Risk Register</li> <li>Conservation Area Appraisals</li> <li>Neighbourhood Plans</li> <li>Google Maps</li> </ul>	?	heritage assets and/or may enhance heritage assets such as a Listed Building; provides additional survey information.  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.  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.
Theme: Soils, Land & Mi SEA Directive Topic(s): Soil NPPF Paragraphs: 79-92, 1 5. To protect and	09-125		++	The site option is entirely brownfield land and
conserve soil, land and minerals	<ul><li>Result in the loss of soils and agricultural land?</li><li>Make the best use of</li></ul>	<ul><li>Magic Map</li><li>DNPA GIS Layers</li><li>Google Maps</li></ul>		includes no greenfield land.
	brownfield land?  Promote sustainable mineral extraction?  Protect future mineral resources?	<ul><li>Google Maps</li><li>Dartmoor Minerals Paper (2017)</li></ul>	+	The site option is partially brownfield land.
		Landscape Character Study (2017)	0	No negative or positive effect on soils, overall neutral effect.
	Minimise the risk of	, ,	?	There is uncertainty as to the effect of the

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	contaminating soils?		-	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.
Theme: Water - Resource SEA Directive Topic(s): Water NPPF Paragraphs: 99-125	es, Quality and Flooding ter			
6. To promote efficient water use and improve water	Promote sustainable water management and water use efficiencies?	<ul><li>Magic Map</li><li>DNPA GIS Layers</li></ul>	++	Not Applicable
quality	Result in any loss of quality or quantity that could affect WFD objectives for	<ul> <li>South West River         Basin Management         Plan</li> <li>Environment Agency         Online Maps</li> <li>Catchment Data         Explorer</li> </ul>	+	There is the potential for minor positive effect on the status of waterbodies.
	good ecological status?		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
7. To reduce the risk of	Propose development in a	<ul> <li>DNPA GIS Lavers</li> </ul>	++	The site option can contribute to the

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flooding from all sources and manage flood risk more sustainably	flood zone, Critical Drainage Area, or put properties at risk of flooding?  Provide opportunities for addressing flood risk?  Promote sustainable urban drainage systems (SUDs)?  Provide any opportunities for progressing more sustainable management of habitats and flood risk management in upper catchments (resolving existing problems)?	<ul> <li>Environment Agency Online Flood Zone Maps</li> <li>DNPA Strategic Flood Risk Assessment</li> </ul>	helping possibil habita:  + Potent accome ffect.  O The site and wirisk, with risk, with site information of the site flood z howev develor.  - Site op design.	e option is not located in a flood zone ill not contribute to alleviating flood th a neutral effect.  s some uncertainty as to the effect of e option on flooding; gaps in
Theme: Communities SEA Directive Topic(s): Pop NPPF Paragraphs: 47-78 8. To maintain and enhance community and settlement identities	<ul> <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</li> </ul>	<ul> <li>Google Maps</li> <li>Neighbourhood Plans</li> <li>Parish Profiles</li> <li>Parish Workshops &amp; Meetings</li> </ul>	develor strength rural vit the strength vitality, settlem	s identified community support for new opment and development will then the role of the Local Centres or tality e option has the potential to then the role of Local Centres & rural, and will have a positive effect on the nents identity and/or community e option will have no negative or e effects on the local community,

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	of local & rural centres?			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	Support sufficient services	<ul> <li>Google Maps</li> </ul>	++	Development could help improve services &
provision & accessibility of	& facilities for existing communities & new	Neighbourhood Plans		facilities resolving an existing sustainability issue or problem.
	development?	Parish Profiles	+	Development could help maintain current
	development;			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
				A reduital effect is flot 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): Pop NPPF Paragraphs: 47-78	oulation and Human Health			
10. To ensure that the	Provide sufficient quality	• OAN	++	Site option will provide housing to meet the

<sup>&</sup>lt;sup>18</sup> Please note that capacity of access routes and parking is covered by SA Objective Nos 13 & 14 on transport

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housing needs of all National Park residents are met	housing to meet the identified needs of all communities within the National Park?  Provide an appropriate mix of types of housing, including affordable & adaptable?  Provide for those whose work is important to the National Park, including agricultural & forestry?	<ul><li>LAA</li><li>Paper (2017)</li></ul>	+ 0 ? -	needs of all in the National Park, including affordable, adaptable & for key workers Provides housing but not necessarily for all  Site option is providing employment land with no housing identified, with a residual neutral effect.  Not Applicable  Not Applicable
Theme: Health and Equ SEA Directive Topic(s): Pop NPPF Paragraphs: 69-78  11. To improve the health and wellbeing of communities and reduce inequalities	<ul> <li>alities</li> <li>bulation and Human Health</li> <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>19</sup>?</li> <li>Promote access &amp; use of the National Park for</li> </ul>	<ul> <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.  There will be no loss or enhancement of green infrastructure or public open space.

<sup>&</sup>lt;sup>19</sup> Please note that encouraging healthy lifestyles through sustainable transport is addressed in the theme following on Transport & Movement

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Theme: Economy and E	different ethnic groups?  Promote access & use of the National Park for disabled people?  mployment oulation and Human Health		?	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.
NPPF Paragraphs: 18-22  12. To promote & support the economy, especially key business sectors of tourism, agriculture, leisure/recreation & small businesses	<ul> <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> <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.  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

NPPF Paragraphs: 29-41	oulation and Human Health		
congestion, particularly on outskirts of the National Park, and reduce associated indirect impacts on air quality and greenhouse gas emissions	<ul> <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>	<ul> <li>Google Maps</li> <li>Devon and Torbay Local Transport Plan (2014)</li> <li>Magic Map</li> <li>AQMA Boundary Map</li> <li>Parish Profiles</li> <li>Neighbourhood Plans</li> </ul>	<ul> <li>The site option will actively reduce traffic in an area with identified congestion issues and/or provide additional parking, with a major positive effect.</li> <li>The site option will not result in an increase traffic with a minor positive effect.</li> <li>The site option will have an increase in traff however the increase will not be significant and is not in a congested area or AQMA, with a residual neutral effect.</li> <li>There is uncertainty with regards to the effect of the site option on congestion and air quality; gaps in information.</li> <li>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.</li> <li>The site option will significantly increase traffic in a congested area and/or a nearly AQMA, and will exacerbate an existing parking issue within the settlement, with a major negative effect.</li> </ul>
14. To encourage a change to sustainable transport modes and to reduce the need to travel	<ul> <li>Improve access to, and quality of, sustainable transport modes?</li> <li>Provide opportunities to enhance the cycling &amp; footpath network?</li> </ul>	<ul> <li>Google Maps</li> <li>Devon and Torbay Local Transport Plan (2014)</li> <li>Bus Timetables</li> <li>Magic Map</li> </ul>	<ul> <li>The site option has good access to footpaths, sustainable transport links, the PRoW network and cycle routes, and publ transport services run regularly throughout the year.</li> <li>The site option has good access to either footpaths, sustainable transport links, the</li> </ul>

<sup>&</sup>lt;sup>20</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.

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	Encourage a reduction in the need to travel by car?	<ul><li>Parish Profiles</li><li>Neighbourhood Plans</li></ul>		PRoW network or cycle routes. 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.
Theme: Waste SEA Directive Topic(s): Ma NPPF Paragraphs: 5, 142-1				
15. To reduce waste & promote reuse and recycling	<ul><li>Reduce waste?</li><li>Promote reuse, recycling or composting?</li></ul>		assessme provide s	c has been scoped out of the SA site ents as all site options have the potential to sustainable design and waste management led by other core policies.

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- 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>21</sup>, cumulative<sup>22</sup> and synergistic<sup>23</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 here in Section 5 of this Initial SA Report and details in Appendix I.
- 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.
- 2.12 Emerging policies and options for site allocations will be tested through SA and reported in the SA Report that accompanies the Regulation 18 draft Local Plan on consultation in the summer 2018. The site options will be tested using the Sites SA Framework. The draft Core/Strategic and Development Management Policies will be 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

<sup>&</sup>lt;sup>21</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>&</sup>lt;sup>22</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>&</sup>lt;sup>23</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 will be 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 will 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 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.

## 3.0 SUSTAINABILITY CONTEXT, OBJECTIVES & BASELINE CHARACTERSITICS

#### 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)

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, as follows:

#### National:

- DCLG, National Planning Policy Framework (NPPF), 2012
- 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)
- 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)

#### 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)
- Dev on & Torbay Local Transport Plan 3, 2011-2026
- Dev on Council- A Strategy for Growth, 2013-2020
- Dev on Joint Health & Wellbeing Strategy, 2016-2019
- Dev on 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 (Adoption planned for 2017)
- Cornwall Local Plan (Adopted 2016)
- Plymouth & South West Devon Joint Local Plan to 2034 (submitted for public examination in August 2017)
- Teignbridge Local Plan (Adopted 2014)
- Mid Devon Local Plan (Review, submitted in March 2017 for examination)
- Torbay Local Plan (Adopted 2015)
- East Devon Local Plan (Adopted 2016)
- Exeter City Local Plan (Adopted 2012)
- Greater Exeter Strategic Plan to 2040 (GSEP in early stages)
- 3.3 National Parks have specific planning policy at a national level. Within the NPPF, it is specified that National Parks have the 'highest status of protection in relation to landscape and scenic beauty', and that 'great weight is given to conserving landscape and scenic beauty in National Parks'<sup>24</sup>. The NPPF also states that wildlife conservation and cultural heritage within National Parks are also given great weight due to their importance to the National Parks. Furthermore, the government has recognised that National Parks are not appropriate locations for unrestricted housing growth, and therefore general housing targets are not provided for National Park Authorities<sup>25</sup>.

<sup>&</sup>lt;sup>24</sup> DCLG (2012) National planning Policy Framework

<sup>&</sup>lt;sup>25</sup> DEFRA (2010) English National Parks and the Broads: UK Government Vision and Circular 2020

- 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>26</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>27</sup> (to the year 2034, submitted for independent examination August 2017). The Park is located within wholly within Devon County, and is split between Teignbridge, South Hams and West Devon Councils with a small part of Mid Devon Council. As nearby Local Plans are prepared, DNPA is working with those Authorities through the Duty to Cooperate 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>28</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**

23.6 Landscape & Settlement Character: The area was designated as a National Park in 1951 due to its natural landscape, wildlife and historical features<sup>29</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>30</sup>. The Dartmoor NCA is characterised by extensive upland moorland, overlaid with peat deposits and supports internationally important blanket 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.

<sup>26</sup> https://www.gesp.org.uk/

<sup>27</sup> https://plymswdevonplan.co.uk/news

<sup>&</sup>lt;sup>28</sup> DNPA (2017) Duty to Co-operate Scoping Report

<sup>29</sup> http://www.nationalparks.gov.uk/

<sup>30</sup> Magic Map (2017)

Associated farmsteads, pastoral fields and hedgebanks are a key part of the landscape<sup>31</sup>. The National Park is considered to have a high level of tranquillity, and dark night skies<sup>32</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.

- 3.7 **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>33</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>34</sup> and it contains locally designated biodiversity sites, which includes 232 County Wildlife Sites (CWS)<sup>35</sup>.
- 3.8 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>36</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.
- 3.9 **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 integral parts of the landscape, and may have local significance to communities and individuals; also, many contribute significantly to the character of the places.

<sup>&</sup>lt;sup>31</sup> Natural England (2014) Dartmoor National Character Area Profile

<sup>32</sup> Ibid.

<sup>33</sup> Magic Map (2017)

<sup>&</sup>lt;sup>34</sup> DNPA (2017) State of the Park Report

<sup>35</sup> DNPA (2017) State of the Park Report

<sup>36</sup> http://www.biodiversitysouthwest.org.uk/nmap.html

- 3.10 **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 as Grade 5, least fertile, with some Grade 3 (sub-grade not known) on the edges of the National Park<sup>37</sup>. Due to the poor soil quality, horticulture, arable farming and dairy farming are constrained to small areas within the National Park<sup>38</sup>. However, the soil resources of Dartmoor are still important, for non-intensive grazing and biodiversity.
- 3.11 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>39</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>40</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>41</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>42</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.
- 3.12 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>43</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 lyybridge 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>44</sup>. More sustainable flood risk management 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

<sup>&</sup>lt;sup>37</sup> Natural England (2014) Dartmoor National Character Area Profile

<sup>38</sup> http://www.dartmoor.gov.uk/wildlife-and-heritage/heritage/farming

<sup>&</sup>lt;sup>39</sup> Natural England (2014) Dartmoor National Character Area Profile

<sup>40</sup> South West Water (2014) Water Resources Management Plan

<sup>41</sup> http://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/8

<sup>42</sup> Environment Agency Data Catchment Explorer

<sup>43</sup> https://new.devon.gov.uk/floodriskmanagement/planning-and-development/

<sup>44</sup> Scott Wilson for DNPA (2010) Level 1 Strategic Flood Risk Assessment

Dartmoor<sup>45</sup> 46 but the underlying geology and associated land use may limit further possibilities.

- 3.13 **Communities**: Dartmoor has a population of 34,000 residents who live within the National Park boundaries<sup>47</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>48</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.
- 3.14 **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>49</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.
- 3.15 **Health & Equalities:** Dartmoor has a lower than average Index of Multiple Deprivation (IMD) score, of 17.1 compared to the national average of 21.7850. 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 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

<sup>45</sup> Dartmoor Mires Project

<sup>46</sup> Environment Agency (2012) South Devon Catchment Flood Management Plan

<sup>&</sup>lt;sup>47</sup> Edge analytics for DNPA (2016) Dartmoor National Park Demographic Forecasts

<sup>&</sup>lt;sup>48</sup> Edge analytics for DNPA (2016) Dartmoor National Park Demographic Forecasts

<sup>&</sup>lt;sup>49</sup> DNPA (2017) State of the Park Report

<sup>50</sup> DNPA (2017) State of the Park Report

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>51</sup>.

- 3.16 **Economy & Employment**: Dartmoor has a population of 33,600 with 25,000 of working age. The size of the population has remained stable over the last decade<sup>52</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>53</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.
- 3.17 **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>54</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.
- 3.18 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.

<sup>&</sup>lt;sup>51</sup> DNPA (2011) Open Space, Sport & Recreation Study

<sup>&</sup>lt;sup>52</sup> ONS (2013) 2011 Census: Characteristics of National Parks

<sup>53</sup> Dartmoor and Exmoor National Parks – Economic Prospectus 2015

<sup>&</sup>lt;sup>54</sup> Office for National Statistics (2017) 2011 census data

- 3.19 There are no Air Quality Management Areas (AQMA)<sup>55</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.
- 3.20 **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>56</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.
- 3.21 **Waste**: In 2014, almost 50% of waste within Dartmoor was sent to reuse, recycling or compost, which is higher than the national average<sup>57</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

- 3.22 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.
- 3.23 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.

<sup>55</sup> https://uk-air.defra.gov.uk/aqma/maps

<sup>&</sup>lt;sup>56</sup> DNPA (2014) Dartmoor National Park Management Plan

<sup>&</sup>lt;sup>57</sup> DNPA (2014) Local Plan Annual Monitoring Report

- 3.24 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).
- 3.25 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.
- 3.26 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

3.26 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  New development has the potential for an unacceptable effect on the landscape or settlement character & their settings.  High quality design needs to be promoted to make positive contributions to the landscape and townscape in the National Park.  Identification of appropriate standards and aspirations for sustainable construction and operation.  Deterioration of the Valued Attributes of key Landscape Character Types that may be at risk should be prevented.  Farming practises and forestry activities should not result in landscape deterioration through new access ways such as tracks, new buildings and changes in practises.  The impact of light pollution from peripheral towns and
<ul> <li>Eandscape &amp; Settlement</li> <li>Character</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</li> </ul>
cities, and development within the National Park, which threatens the dark night skies of Dartmoor, should be minimised.  Change of farmsteads to residential or holiday lets can harm the integration of farmsteads with the landscape through additional buildings and suburban gardens.

	the landscape.
	Dartmoor has internationally, nationally and locally
Biodiversity,	designated biodiversity and geodiversity which cover a
Geodiversity	large area of the National Park, most of which are in good
& Green	condition, and need to be protected from effects of
Infrastructure	development.
	<ul> <li>Managing access so that designated sites, priority habitat</li> </ul>
	and priority species are not negatively affected by
	recreational activities.
	<ul> <li>Encouraging sustainable farming practises, and engaging</li> </ul>
	farmers to ensure agricultural methods and development
	arising from agricultural practises do not result in negative
	effects on biodiversity.
	Increasing stepping stones and habitat linkages to promote
	wildlife movement within Dartmoor.
	<ul> <li>Dartmoor has a higher than national average of SSSIs in</li> </ul>
	'Favourable' or 'Unfavourable recovering' condition, with
	an aim to improve sites which are currently in an
	'unfavourable' condition.
	<ul> <li>Need to ensure that development does not result in the loss</li> </ul>
	or damage of key habitats and wildlife.
	Climate change will threaten Dartmoor's varied habitats  and wild a range of the acids.
	and wide range of species.  Awareness of currently undesignated areas of biodiversity
	7 (Waleriess of contently officesignated areas of broattershy
	which may have the potential for designation, and which
	are still important for local biodiversity and require protecting.
	<ul> <li>Ensuring forestry activities are sustainable and do not</li> </ul>
	degrade or result in the loss of key habitats or biodiversity.
	<ul> <li>Within the National Park there is a range of historical and</li> </ul>
Historic	archaeological features, both designated and
Environment	undesignated, most of which are in good condition.
	<ul> <li>The setting of designated heritage assets such as Listed</li> </ul>
	Buildings and Scheduled Monuments should be protected
	from development.
	Taking active measure to conserve and improve heritage
	assets which are considered to be 'At Risk'.
	<ul> <li>Protecting historic farmsteads and farm buildings, and</li> </ul>
	promoting the reuse of derelict or abandoned buildings
	without adverse effects on the character and cultural
	heritage of the National Park.
	<ul> <li>Increasing knowledge and identifying undesignated local</li> </ul>
	archaeological and historical features.
	The character of designated Conservation Areas may be
	adversely affected from poorly designed new development
	and modifications to vernacular buildings.
	The Park area does not include any best and most versatile
Soils, Land &	agricultural land (Grade 1-3a) but it is important that soil
Minerals	resources are not degraded or lost - this is a national issue.
	Guarantee any new proposals for mining or quarrying
	operations do not negatively affect the special qualities of

	the National Park.
	<ul> <li>Promoting the use of previously developed land for</li> </ul>
	development.
	<ul> <li>Avoiding development in Mineral Safeguarded Areas which</li> </ul>
	would sterilise resources.
	<ul> <li>Contributing to water quality improvement throughout the</li> </ul>
Water-	National Park so that at least 60% of water bodies and
Resources,	monitored water length meet good status by 2021 - as
Quality and	required by the Water Framework Regulations through the
Flooding	Environment Agency.
	<ul> <li>Possibilities for promoting sustainable management of water</li> </ul>
	resources in new and existing developments.
	<ul> <li>Avoiding development in areas of flood risk.</li> </ul>
	<ul> <li>Investigating opportunities to manage flood risk in upper</li> </ul>
	catchments through changed habitats and land use
	practices.
	An ageing population which will result in increased pressure
Communities	on local health facilities, and a higher old age dependency
	ratio (this is also a national issue).
	The decline of some rural settlements due to limited
	opportunities for appropriate full-time employment.
	<ul> <li>Need to allow opportunities for new sustainable uses for</li> </ul>
	rural barns, whilst avoiding conversion to inappropriate uses.
	Cooperation needed where settlements adjoin or are split
	between Local Planning Authority areas, including
	Ashburton, Buckfastleigh, Cheriton Bishop and Yelverton.
	New development should be focussed in areas that are the
	most sustainable and have the capacity for change.
Haveine	A need for affordable housing for local and young people,      A need for affordable hou
Housing	and appropriate housing for older people who may be
	Iooking to downsize.  • Meeting the housing need for the different demographics
	within the National Park.
	<ul> <li>A high average house price which greatly exceeds the</li> </ul>
	average wage for the area, making access to the property
	market unattainable for many.
	Special circumstances for succession farm dwellings to
	enable people to continue to undertake traditional and
	sustainable farming and woodland management
	<ul> <li>Increasing prevalence of second homes and holiday homes</li> </ul>
	<ul> <li>Need for additional open space and play facilities in some</li> </ul>
Health &	settlements, but in the context of limited opportunities for
Equalities	ongoing maintenance and management funding.
	Highlighted differences in IMD scores between different
	LSOAs, with some LSOAs more deprived than others
	<ul> <li>Promoting access and use of the National Park for different</li> </ul>
	ethnic groups – (also a national issue).
	<ul> <li>Ensuring that disabled people can still access and use the</li> </ul>
	National Park.
	Higher levels of fuel poverty than the national average.
	<ul> <li>Regional differences in equality, including education and</li> </ul>

	life expectancy discrepancies.
	Aging population and therefore a decreasing proportion of
Economy &	those who are economically active – (also national issue).
Employment	Net out-commuting for work, which may increase as
	peripheral towns and cities grow.
	<ul> <li>Relatively low wages and high house prices which may</li> </ul>
	deter/prohibit young workers living in the National Park.
	<ul> <li>Almost half of businesses are small or micro, and there is a</li> </ul>
	high level of self-employment, with relatively small demand
	for new floorspace space forecast.
	Existing employment land and business units are poor to      A solution of the standard and business units are poor to
	medium quality and small scale, with limited appetite for
	investment or speculative builds.
	Relatively high employment in agriculture, but this is forecast
	to fall while other sectors (construction, businesses services, accommodation and food) are forecast to grow.
	<ul> <li>20-30% of employment is in tourism, with large-scale</li> </ul>
	expenditure in the local economy by tourists.
	<ul> <li>Tourism is dominated by day visitors, although the number of</li> </ul>
	staying visitors is growing suggesting an opportunity to
	expand and realise greater benefits.
	<ul> <li>Much of the economy depends on the quality of the natural</li> </ul>
	and built environment, and overall natural capital, through
	encouraging tourism, visitors, and location of businesses.
	High dependence on private vehicle use with poor and
Transport,	infrequent public transport services – a common feature in
Movement &	rural Devon.
Air Quality	<ul> <li>Risk of congesting road network in vicinity of new major</li> </ul>
	developments on outskirts of National Park area.
	Reduce levels of atmospheric pollution, specifically NO2
	emissions, and their adverse effects on habitats.
	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.
	<ul> <li>Supporting working from home in rural communities to help</li> </ul>
	ease congestion.
	<ul> <li>Guiding development to areas that have good transport</li> </ul>
	infrastructure and public transport connections.
	<ul> <li>Investing in the Public Rights of Way (PRoW) network to</li> </ul>
	address declining rate of PRoW that is categorised as in
	'easy to use' condition.
	<ul> <li>Promote sustainable transport in the National Park,</li> </ul>
	improving existing public transport & supporting cycling and
	walking routes – with potential for secondary positive effects
	on health and well-being.
	Reducing energy consumption, with a focus on transport
Energy &	which accounts for almost 50% of the National Park's energy
Climate	consumption.
Change	Increasing the energy efficiency of older dwellings, and
	ensuring new buildings have high energy efficiency
	standards.

	<ul> <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>
Waste	<ul> <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**

3.27 Technical studies were ongoing as the initial SA was being prepared and further studies will be 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

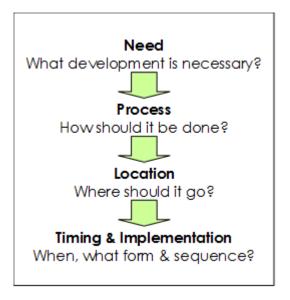
### Assessment of Alternatives in SA/SEA

4.1 The EU SEA Directive<sup>58</sup> requires assessment of the likely significant effects of implementing the plan and "reasonable alternatives" taking into account

<sup>&</sup>lt;sup>58</sup> http://ec.europa.eu/environment/eia/sea-legalcontext.htm

- "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>59</sup> advises that it is should be taken to mean "realistic and relevant" i.e. deliverable and within the timescale of the plan. The NPPF (paragraph 165) 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>60</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



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>61</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.

<sup>&</sup>lt;sup>59</sup> http://planningguidance.communities.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/

<sup>60</sup> https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/7657/practicalguidesea.pdf

<sup>&</sup>lt;sup>61</sup> Save Historic Newmarket Ltd v Forest Heath District Council (2011) EWHC 606

- 4.4 The Broadlands Judgment<sup>62</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>63</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>64</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 Councils 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, 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.

<sup>&</sup>lt;sup>62</sup> Heard v Broadland District Council, S Norfolk District Council, Norwich City Council (2012) EWHC 344

<sup>63</sup> Cogent Land LLP v Rochford District Council (2012) EWHC 2542

<sup>&</sup>lt;sup>64</sup> Ashdown Forest Economic Development LLP v SSCLG, Wealden District Council and South Downs National Park Authority [2014] EWHC 406 (Admin)

- 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 has identified four reasonable approaches to a spatial strategy for Dartmoor; these have been tested through the SA process and the findings are provided in this Initial SA Report.
- 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) will be tested through the SA process and this will be reported in the next version of the SA Report that accompanies the Regulation 18 consultation draft of the Local Plan.
- 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>65</sup> has been prepared by DNPA in 2017. The Scoping Report outlines the strategic matters for the Dartmoor Local Plan and

<sup>&</sup>lt;sup>65</sup> DNPA (2017) Duty to Co-operate Scoping Report

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. 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 will also be important for the HRA and assessing the likely impacts – individually and in-combination with other plans and projects. This will be reported at the next stage of plan-making that will include policies and proposed site allocations.

## 5.0 SA OF VISION & OPTIONS FOR THE SPATIAL STRATEGY

#### **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

There is access to high quality affordable housing for those who contribute to Dartmoor's thriving communities

#### A place to do business

Businesses which respect and value Dartmoor's special qualities have the opportunity to thrive

#### Sustainability – living within environmental limits

Dartmoor's natural resource is conserved, and there are opportunities for innovation in the way in which we live and work, which provides inspiration to others.

#### Culture and arts

The National Park provides a source of inspiration, and is a place where culture and art celebrates and values Dartmoor's special qualities.

#### Exemplars for good development

All new development has a distinctive 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 improve, challenge and innovate.

## • Prosperous and vibrant communities

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

## Resilient landscape

The National Park's unique 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.

#### • An historic environment in excellent condition

Dartmoor's archaeological resource is protected and available as a source of inspiration and education. Dartmoor's historic built environment is conserved, in good condition, and continues to be viable through appropriate re-use.

#### Opportunities for access and enjoyment

The special qualities of the National Park are respected, available as a resource for health and well-being, and accessible for everyone to understand and enjoy.

- 5.2 A compatibility analysis was undertaken of the draft Vision and is shown in Appendix I. 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.

## **Options for the Spatial Strategy**

5.4 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

5.5 The SA tested these four options using the strategic SA Framework and the details are provided in Appendix II of this Initial SA Report; the findings are summarised in the Table 5.1, as follows:

Table 5.1: Summary SA of Options for Spatial Strategy

Table 5.1: Summary SA of Options for Spat	iui si	iiaie	y		l							
Sustainability Objective	1. Current Two Tier	Current Two Tier     Size, Character     with Two Tiers			3. Size, Character	with Three Tiers	4. Spatial or Clustered					
To conserve and enhance the landscape and settlement character of Dartmoor National Park <sup>66</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	7	+		+		+		+				
3 To protect, enhance and manage biodiversity & geodiversity for net gain <sup>67</sup>	0?	0? ?		0? ?		0 +?		+?	0? ?			
<b>4.</b> To ensure the protection, conservation, and enhancement of the <b>historic environment</b> & its setting	(	0 +?		·?	+		0					
5. To protect and conserve soil, land and minerals <sup>68</sup>	-	- 0		0	-	0	-	0				
<b>6.</b> To promote efficient <b>water</b> use and improve water quality <sup>69</sup>	+	+ 0		0	+	0	+	0				
7. To reduce the risk of flooding from all sources and manage flood risk more sustainably	0		+?		+?		0					
8. To maintain and enhance community and settlement identities distinctive to Dartmoor	+		++?		? ++		?					
<ol> <li>To support the provision &amp; accessibility of services &amp; facilities</li> </ol>	4	+ ++?			? ++			?				
10. To ensure that the <b>housing</b> needs of all National Park residents are met	4	+ ++?		+?	++		+					
<b>11.</b> To improve the <b>health and wellbeing</b> of communities and reduce inequalities <sup>70</sup>	+?	?	+	?	+	?	?	?				
12. To promote & support the <b>economy</b> , especially key business sectors of tourism, agriculture, leisure/recreation & small businesses					?							

 $<sup>^{66}</sup>$  Please note that first symbol refers to landscape, second symbol to settlement character

<sup>&</sup>lt;sup>67</sup> Please note that first symbol relates to biodiversity, second to Green Infrastructure

<sup>68</sup> Please note that first symbol relates to soil, second symbol relates to minerals

<sup>&</sup>lt;sup>69</sup> Please note that first symbol relates to water resources, second symbol to water quality

<sup>&</sup>lt;sup>70</sup> Please note that first symbol relates to open space, second symbol relates to green infrastructure

13. To help reduce congestion, particularly on outskirts of the National Park, and reduce associated indirect impacts on air quality and greenhouse gas emissions	0?	0	0	?
14. To encourage a change to sustainable transport modes and to reduce the need to travel	0?	0	0	?
15. To reduce waste & promote reuse & recycling	0	0	0	0

- 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. Options 1, 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 with emerging draft DNPA Policies and the Design Guidance with minor positive effects.
- 5.7 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.
- 5.8 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.
- 5.9 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.
- 5.10 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.
- 5.11 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.
- 5.12 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.

- 5.13 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.
- 5.14 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.
- 5.15 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 10 clusters is uncertain at this stage of plan-making and assessment.
- 5.16 All four options have the potential to promote sustainable design and waste management as guided by other core policies.

## The Proposed Preferred Spatial Strategy

5.17 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

<u>strategy</u>	
Options	Outline Reasons for Selection/Rejection
1 Current 2 Tier	<ul> <li>Relies more on separate policy for specific</li> </ul>
Approach	settlement issues
	Places together a broad range of medium/small
	sized settlements
	<ul> <li>Limits some opportunities in medium sized</li> </ul>
	settlements
2 Settlement Size &	Better recognises the needs & constraints of
Character (2 Tier)	different settlements
	<ul> <li>Focuses development in largest settlements where</li> </ul>
	capacity is greatest
	<ul> <li>Protects more sensitive settlements</li> </ul>
3 Settlement Size &	<ul> <li>Better recognises the needs &amp; constraints of</li> </ul>
Character (3 Tier)	different settlements
	<ul> <li>Focuses development in largest settlements where</li> </ul>
	capacity is greatest
	Protects more sensitive settlements
	Seeks to provide opportunities in smaller villages
4 Spatial or	<ul> <li>Provides greatest flexibility but creates a more</li> </ul>
Clustered	complex & difficult to manage approach
Approach	<ul> <li>Could lead to unmet need in certain settlements</li> </ul>
	<ul> <li>Challenging to establish &amp; requires cooperation</li> </ul>
	between communities
	<ul> <li>Difficult to get consensus on lines between areas</li> </ul>

### 6.0 CONCLUSIONS, CONSULTATION & NEXT STEPS

- 6.1 The SA has helped identify and refine alternatives, and investigated the four options for the Spatial Strategy approach for the emerging Dartmoor Local Plan. A comparative assessment was undertaken and the outline reasons for selection/rejection of options is provided. The draft Vision was tested through SA and there was no incompatibility found between plan and SA objectives.
- 6.2 The Vision & Spatial Strategy Topic Paper and this Initial SA Report will be placed on the DNPA website for people to comment on if they wish. Any comments made will be considered in the next stage of plan-making and its accompanying SA. The DNPA is attending open meetings with Parish and Town Councils through November-December 2017 to talk about the Local Plan Review, the process for identifying potential sites, and the options that can be considered for each community. All reasonable alternative site options will be subject to SA using the detailed SA Sites Framework and including investigating the cumulative effects on settlements. The preferred site options will be tested through the HRA process and taking into account the emerging development management policies. In line with the requirements of the SEA Regulations, the implementation of the draft Local Plan as a whole will be appraised. A separate HRA and EqIA report will be prepared; the key findings of these assessments will be integrated into the overall SA Report.
- 6.3 The next stage of the plan will be the Draft Local Plan Regulation 18 that will include the Vision, Spatial Strategy, Core/Strategic and Development Management Policies, and proposed Site Allocations. Technical studies, including the SA, are ongoing and it is likely that it will be subject to consultation in the summer 2018 and this will include the accompanying SA, EqIA and HRA Reports. Representations made to the draft Plan and SA will be reviewed and considered in the continued ongoing and iterative way to inform the preparation of the Regulation 19 Local Plan (Pre-Submission). Comments made on the SA and HRA will be reported, together with the responses made.

## **Appendices**

I Compatibility Analysis of Plan Vision
II SA of Options for Spatial Strategy

## Dartmoor National Park Local Plan Review: Sustainability Appraisal Initial SA Report Appendix I: Compatibility Analysis of Draft Vision

## Key:

+	Compatible
-	Not compatible
0	Neutral or not applicable
?	Uncertain

							SA C	bjec	tives						
Dartmoor Local Plan Review Draft Vision	1. landscape	2. Built Quality	3. Bio Geodiversity	4. Cultural Heritage	5. Soils & Land	6. Water	7. Flood Risk	8. Communities	9. Services, Facilities	10. Housing	11. Health	12. Economy	13. Traffic & AQ	14. Sustain Transport	15. Waste
Decent homes	Ś	+	0	0	-ș	0	+	+	+	+	+	+	Ś	ċ	0
A place to do business	0	0	0	0	0	0	0	+	+	0	+	+	Ś	Š	0
Sustainability – living within environmental limits	+	+	+	+	+	+	+	+	0	0	+	+	+	+	+
Culture & arts	0	+	0	+	0	0	0	+	+	0	+	+	0	0	0
Exemplars for good development	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
Community involvement & participation	0	+	0	+	0	0	0	+	+	+	+	+	Ś	Ś	0
Prosperous & vibrant communities	0	+	0	+	0	0	0	+	+	+	+	+	Ś	Ś	0
Resilient landscape	+	+	+	+	+	+	+	+	0	0	+	+	0	0	0
Thriving habitats & species	+	+	+	+	+	+	+	+	0	0	+	+	0	0	0
An historic environment in excellent condition	+	+	0	+	+	0	0	+	0	0	+	+	0	0	0
Opportunities for access & enjoyment	+	+	+ș	+	+	+	0	+	+	0	+	+	Ś	Š	0s

## Dartmoor Local Plan Review: Sustainability Appraisal (SA) Appendix II: SA of Spatial Strategy Options

Option	ns for Spatial Strategy
1	Current Two-Tier approach with 8 Local Centres; 34 Rural Settlements; everywhere else defined as Open Countryside – based on current services & facilities
2	Two-Tier approach based more upon size, overall role, & capacity/sensitivity to growth, as well as an element of settlement services & facilities
3	As Option 2 but splitting into Three Tiers – Local Centres, Rural Settlements, and Villages & Hamlets, plus the remaining Open Countryside
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

Key: Categories of Significance								
Symbol	Meaning	Sustainability Effect						
	Major Negative	Problematical and improbable because of known sustainability issues; mitigation likely to be difficult and/or expensive						
-	Minor negative	Potential sustainability issues: mitigation and/or negotiation possible						
+	Minor positive	No sustainability constraints and development acceptable						
++	Major Positive	Development encouraged as would resolve existing sustainability problem						
?	Uncertain	Uncertain or Unknown Effects						
0	Neutral	Neutral effect						
N/A	Not Applica	uble						

Some SA Objectives will have split symbol boxes: SA 1: First symbol relates to landscape, second symbol relates to settlement character; SA 3 first symbol relates to biodiversity, second to Green Infrastructure; SA 5: First symbol relates to soil, second symbol relates to minerals; SA 6 first water resources, second water quality; SA 11: First symbol relates to open space, second symbol relates to green infrastructure.

					)ptio				
Sustainability Objective	Assessment of Effects  Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	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 landscape and settlement character of Dartmoor National Park	The character, quality and protection of the landscape of the Dartmoor National Park (DNP) is fundamental to its designation and statutory purposes; it is designated for its natural landscape, wildlife and historical features <sup>71</sup> .  Dartmoor NP is almost entirely located within the Dartmoor National Character Area <sup>72</sup> (NCA), with some of the periphery of the National Park located in adjacent NCAs, including the South Devon NCA and The Culm NCA. It is characterised by extensive upland moorland, which is overlaid with peat deposits and supports internationally important blanket bogs. The peat and bogs are important for carbon storage, and for absorbing and releasing large amounts of water. The National Park is considered to have a high level of tranquillity, and dark night skies <sup>73</sup> , although the area is not currently designated as a Dark Sky Reserve.  Option 1 the current Two-Tier approach focuses development in the largest settlements and protects open countryside from unchecked growth indicating minor positive effects for landscape and settlement character that are likely to be cumulative.  Options 2 & 3 build upon the approach in Option 1 by also considering the relative	+	+	++ ?	++ ?	++	++	+?	+?

<sup>71</sup> http://www.nationalparks.gov.uk/

<sup>&</sup>lt;sup>72</sup> Natural England (2014) Dartmoor National Character Area Profile

<sup>73</sup> Ibid.

	size and sensitivity of different settlements thus better recognising needs and constraints. These options still focus development in the largest settlements and protect open countryside from unchecked growth but seek to more accurately reflect capacity and sensitivity of settlements such that there could be the potential for more positive effects on landscape and settlement character, but uncertain. Options 2 & 3 both include consideration of relative landscape sensitivity and designations on surrounding land, providing mitigation measures, thus indicating major positive effects – more certainty for Option 3 that recognises 3 levels of settlement in a more refined analysis.  Option 4 offers a different approach to the other 3 options by grouping settlements geographically rather than considering them individually. It suggests 10 clusters, based mostly around the larger settlements, together with the surrounding villages and rural hinterland. This approach should still protect the open countryside from unchecked growth indicating minor positive effects for landscape and settlement character but with some uncertainty as the consideration of needs and constraints of different settlements is not clearly addressed (as in Options 2 & 3).								
2. To conserve & enhance the character, safety & sustainability, of the built environment by raising the quality of design and construction	All four options have the potential to support sustainable high-quality design and energy efficiency in accordance with emerging draft DNPA Policies and the Design Guidance – with minor positive effects.	4	•		+		+	+	
3. To protect, enhance and manage	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>74</sup> . There are several national biodiversity designations, with around 28 % of the	0?	?	0	+?	0	+?	0?	?

<sup>&</sup>lt;sup>74</sup> Defra Magic Map (accessed 2017)

# biodiversity & geodiversity for net gain

area as Sites of Special Scientific Interest (SSSI)s<sup>75</sup> (small number designated for geological features) and four National Nature Reserves (NNRs)<sup>76</sup>. The area is also important for locally designated biodiversity sites, including 232 County Wildlife Sites (CWS)<sup>77</sup>. Moorland and woodland is the predominant habitat<sup>78</sup> with Priority Habitats including lowland heath, hay meadows and species rich grasslands, wet woodland and grass moor. There are also traditional orchards that still provide an important habitat in the local ecosystem<sup>79</sup>. Strategic Nature Areas (SNAs) identify areas for maintenance and potential expansion of Priority Habitat<sup>80</sup>. Key Wildlife Areas (KWAs) have been identified on Dartmoor to improve the accuracy of SNAs by combining local knowledge<sup>81</sup>.

All four options protect open countryside from unchecked development growth indicating at least neutral effects for biodiversity and geodiversity.

Option 1 with the focusing of development in the largest settlements indicates that any contributions to green infrastructure (GI) are likely to be focused on the larger settlements with potential positive effects – but there may then be less opportunities to promote GI through new development in the smaller settlements and throughout the wider area of the National Park, with some uncertainty of effects.

A number of the larger settlements are located on the periphery of the National Park and are thus further away from the more sensitive biodiversity areas in the central areas of Dartmoor. Option 1 is therefore less likely to result in significant negative effects on biodiversity overall, although there is still the potential for negative effects, especially relating to the South Hams SAC which is in close proximity to several large settlements.

Options 2 & 3 focuses development in the larger settlements with most capacity and directs development to settlements recognising capacity and sensitivity, thus

<sup>&</sup>lt;sup>75</sup> DNPA (2017) State of the Park Report

<sup>&</sup>lt;sup>76</sup> Defra Magic Map (accessed 2017)

 $<sup>^{\</sup>rm 77}$  DNPA (2017) State of the Park Report

<sup>78</sup> Ibid.

<sup>79</sup> ibid

<sup>80</sup> http://www.biodiversitysouthwest.org.uk/nmap.html

<sup>&</sup>lt;sup>81</sup> DNPA (2017) Natural Environment

	providing mitigation measures by better recognising biodiversity constraints – with at least neutral effects confirmed. There may be more opportunity to contribute to enhancement of GI throughout the area of the National Park with potential minor positive effects that would be synergistic and cumulative over the longer term, but uncertain at this stage of the assessment. It is assumed that Options 2 & 3 will avoid any significant effects on internationally protected biodiversity – by considering the sensitivity – and thus likely neutral effects. The HRA Screening Report (July 2017) <sup>82</sup> determined that seven European sites should be scoped into the HRA to be undertaken of the emerging Local Plan, including the South Hams SAC where there may be particular issues for individual and in-combination effects.  Option 4 proposes 10 clusters based around the larger settlements. This could offer a strategic approach to GI, particularly if the clusters aligned with SNAs and KWAs, and providing linkages to reduce habitat fragmentation. However, the complexity of identifying and working with such clusters has been indicated by the Spatial Strategy Paper (October 2017) such that this option is unlikely to be deliverable and therefore, considerable uncertainty for any likely positive effects.				
4. To ensure the protection, conservation, and enhancement of the historic environment and its setting	One of the statutory purposes of the National Park is to conserve and enhance cultural heritage. Dartmoor has a very rich variety of designated heritage assets, including many Scheduled Monuments, Listed Buildings, Registered Parks/Gardens, Conservation Areas, & Premier Archaeological Landscapes <sup>83</sup> . The various communities that have lived and farmed on Dartmoor have not only shaped the physical landscape, but have imposed their cultural practises and traditions into the important cultural heritage for the National Park.  All four options protect open countryside from unchecked development growth indicating at least neutral effects for the historic environment.  Option 1 focusing development in the larger settlements is likely to have at least neutral effects, particularly as development management policies are prepared to ensure protection and enhancement of the historic environment.	0	+?	+	0

<sup>82</sup> http://www.dartmoor.gov.uk/ data/assets/pdf file/0003/996303/170814 DNPA-HRA-Initial-Screening-Report Final.pdf

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DNPA (2017) State of the Park Report

	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, but uncertainty at this stage of strategic assessment. Options 2 & 3 both include consideration of the extent of the Conservation Area, Listed Buildings/Scheduled Monuments, and designations on surrounding land, providing mitigation measures, thus confirming the positive effects – more certainty for Option 3 that recognises 3 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. To protect and conserve soil, land and minerals	Although farming is prevalent in the National Park with 86% of Dartmoor declared as utilisable agricultural area <sup>84</sup> , the poor soil type means there is no Grade 1/2 designated best and most versatile agricultural land. 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>85</sup> . However, the soil resources are still important, and non-intensive grazing of sheep, ponies and cattle rely on soil for grazing; loss of soil resources can affect farming and also biodiversity. There are only few quarries within the Park and some Mineral Safeguarded Areas (MSAs), designated to prevent development from sterilising potentially economically viable mineral resources, near Ashburton, Trusham, Okehampton and Drewsteignton.  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 MSAs and minerals will be protected through Plan Policies such that at least neutral effects are indicated.	-	0	- 0	-	0	-	0
6. To promote	Dartmoor is considered to be a major water catchment in the south west, with a							

<sup>&</sup>lt;sup>84</sup> DNPA (2017) State of the Park Report

<sup>&</sup>lt;sup>85</sup> Natural England (2014) Dartmoor National Character Area Profile

efficient water	network of streams and mires on the high moor feeding into fast flowing rivers. Much	+	0	+	0	+	0	+	0
use and improve water quality	of Devon including the city of Plymouth <sup>86</sup> , has its water supplied from Dartmoor. The SW Water Resources Plan <sup>87</sup> asserts a surplus of water in the supply zone up to 2040 indicating no sensitivity with regard to water resources for supply. 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 options can demonstrate efficiency of water use through the requirements of emerging development management policies and positive effects indicated through promotion of the vision for exemplar development.								
	Options 2 & 3 acknowledge the potential constraints/sensitivity and capacity of settlements; this would 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.								
7. To reduce the risk of flooding from all sources	The main flood risks in the Park are from fluvial and surfacewater run-off flooding. The effect of climate change on future Flood Zone extents are likely to be limited due to the relatively steep sided valleys that form confined floodplains88. Most of the historic	C	)		+?	+	?	C	)
and manage flood risk more sustainably	flood incidents reported are in the Local Centres of Ashburton, Buckfastleigh, Horrabridge and South Brent, where there are areas of Flood Zone 2 & 3; also in some of the smaller settlements. Critical Drainage Areas (CDAs) <sup>89</sup> have been identified in the Park at Ashburton & Tavistock; also bordering the Park in Okehampton to the north and at Ivybridge to the south.								
	All options will have to comply with national policy requirements with regard to avoiding flood risk – with at least neutral effects – and confirmed through emerging development management policy requirements.								

<sup>&</sup>lt;sup>86</sup> Natural England (2014) Dartmoor National Character Area Profile

<sup>&</sup>lt;sup>87</sup> South West Water (2014) Water Resources Management Plan

<sup>88</sup> South West Water (2014) Water Resources Management Plan

<sup>89</sup> https://new.devon.gov.uk/floodriskmanagement/planning-and-development/

	Options 2 & 3 that also consider the sensitivity and capacity of settlements are likely to offer opportunities resolve existing problems with positive effects, although uncertainty remains at this strategic level of assessment.				
8. To maintain and enhance community and settlement	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.	+	++?	++	?
identities distinctive to Dartmoor	Compared to Option 1, Options 2 & 3 are more likely to recognise the needs and constraints of different settlements and communities with the potential for major positive effects, although the precise significance has some uncertainty at this stage. These Options 2 & 3 specifically seek to protect the more sensitive settlements. Option 3 may offer more certain positive effects by recognising 3 tiers of settlements with a refinement of analysis and indicating a possible stronger resilience to change.  Option 4 with the 10 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 (October 2017) concluded that this option is unlikely to be feasible or deliverable – overall uncertain effects.				
9. To support the provision & accessibility of services & facilities	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.  Options 1, 2 & 3 have the potential for positive effects through the approach of focusing development on the larger settlements that have existing services and	+	++?	++	?
	facilities and will therefore support the vitality of these settlements.  Option 1, compared with Options 2 &3, does not take into account the specific needs and constraints of settlements with less positive effects for accessibility to services and facilities. Whilst both Option 2 & 3 could have major positive effects, this is more likely with Option 3 that recognises 3 tiers of settlements with a refinement of analysis.				

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	Option 4 with the 10 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 (October 2017) concluded that this option is unlikely to be feasible or deliverable – overall uncertain effects.				
10. To ensure that the housing needs of all National Park residents are met	House prices in the National Park largely exceed average earnings. Young people, seasonal staff & part time workers, and other key workers cannot afford accommodation. Traditional farming and woodland management have helped to create the distinctive landscape of Dartmoor, such that special circumstances may be justified when accommodation is required to enable the essential need for a rural worker to live permanently at or near their place of work <sup>90</sup> . There may also be some need for the provision of succession farm dwellings on farmsteads. Enabling people to continue to farm whilst providing the highest status of protection to the landscape is a key issue for the review of the Local Plan Review.  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 – positive effects.  The Spatial Strategy Topic Paper (October 2017) recorded that the farming community were concerned that the existing approach, as set out in Option 1, is too restrictive and with limited opportunities for farm-based housing. The evidence appears unclear but this does introduce some uncertainty and retains Option 1 with only minor positive effects compared with Options 2 & 3. Whilst both 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.	+	++?	++	+

<sup>90</sup> DCLG (2012) NPPF paragrpah14 footnote 9

11. To improve the health and wellbeing of communities and reduce inequalities	All options have the potential to contribute positive effects for health and well-being through provision of identified housing needs (as assessed in SA No 11 previously). All options are unlikely to result in the loss of open space/GI, as this will be management through emerging policies – with at least neutral effects.  Opportunities for enhancing open space/GI are more likely with larger developments and associated with focusing on larger settlements but some uncertainty for Option 1. The additional analysis proposed for Options 2 & 3 might indicate clearer possibilities for enhancing GI. 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.  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.	+?	?	+	?	+	?	?	?
12. To promote & support the economy, especially key business sectors of tourism, agriculture, leisure/recreation & small businesses	The population of the National Park has remained stable over the last decade <sup>91</sup> , but as in other National Parks the population is ageing and higher than the national average. The local economy is remaining resilient and benefitting from a diverse economic base <sup>92</sup> . The number working in agriculture is particularly high and above the average for England as a whole (5%) <sup>93</sup> .  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 10 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 (October 2017) concluded that this option is unlikely to be feasible or deliverable – overall uncertain effects.	+1	?	+-	+?	+	+	?	•

<sup>&</sup>lt;sup>91</sup> ONS (2013) 2011 Census: Characteristics of National Parks

<sup>&</sup>lt;sup>92</sup> Dartmoor State of the Park Report (2017) Draft

<sup>&</sup>lt;sup>93</sup> Valuing England's National Parks – Final Report (2013)

13. To help reduce congestion, particularly on	The main A roads 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>94</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	0?	0	0	?
outskirts of the National Park, and reduce associated	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.				
indirect impacts on air quality and greenhouse gas emissions	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.				
14. To encourage a change to	Option 4 with 10 clusters is uncertain at this stage of plan-making and assessment.  As above for No 13 - 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	0?	0	0	?
sustainable transport modes and to reduce the need to travel	neutral effects by seeking to direct development to where there most services & facilities, thus reducing the need to travel.  Encouragement for sustainable 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 the 10 clusters is uncertain at this stage as effects depend upon the clustering and support of communities – it is unclear whether communities would				

<sup>&</sup>lt;sup>94</sup> Office for National Statistics (2017) 2011 census data

	commit to the levels of discussion to inform decision-making and whether conflicts could be resolved. The Spatial Strategy (October 2017) concluded that this option is unlikely to be feasible or deliverable – overall uncertain effects.				
15. To reduce waste & promote reuse & recycling		0	0	0	0