

## Sustainability Appraisal of the South Downs Local Plan: Preferred Options

### Briefing Note for National Park Authority 16 July 2015

- I.1 The Sustainability Appraisal (SA) report to accompany the Local Plan: Preferred Options is being prepared by consultants Aecom. Aecom have been assessing the emerging policies of the Local Plan as they have been prepared and considered through Planning Committee. They are now bringing this work together in order to provide the SDNPA with a SA report in time for the consultation on the Preferred Options: Local Plan in September.
- I.2 The SA looks at the Local Plan as a whole as well as individual elements in order to assess its success or otherwise in achieving sustainable development.

### What is a Sustainability Appraisal?

- I.3 A sustainability appraisal is a systematic process that must be carried out during the preparation of a Local Plan. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against a range of reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
- I.4 Undertaking the process can help to make sure that the proposals in the plan are the most appropriate. Local Planning Authorities are required to carry out a sustainability appraisal of each of the proposals in the Local Plan during each stage in its preparation.
- I.5 The SA process incorporates the Strategic Environmental Assessment (SEA) process as required by the SEA regulations. Sustainability appraisal is an iterative process informing the development of the Local Plan through its various stages.

### Scope of the SA report to date.

- I.6 The emerging SA Report is the third document to be produced as part of the SA process.
- I.7 The first document was the Scoping Report, which included information about the South Downs's environment and community, and the approach to the SA process. The Scoping Report established a set of sustainability objectives (which have since been revised / updated) against which to test the policy options. These objectives are:
  - 1. To conserve and enhance landscape character. **(Landscape)**
  - 2. To ensure the SDNP communities are prepared for the impacts of climate change. **(Climate Change Adaptation)**
  - 3. To conserve and enhance the region's biodiversity. **(Biodiversity)**
  - 4. To conserve and enhance the historic environment, heritage assets and their settings **(Cultural Heritage)**
  - 5. To encourage increased engagement in cultural activity across all sections of the community in the SDNP and promote sustainable tourism. **(Cultural Activity)**
  - 6. To improve the health and wellbeing of the population and reduce inequalities in health and wellbeing. **(Health and Wellbeing)**
  - 7. To create and sustain vibrant communities which recognise the needs and contributions of all individuals. **(Vitality of Communities)**
  - 8. To improve accessibility to all services and facilities. **(Accessibility)**
  - 9. To improve the efficiency of transport networks by enhancing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel. **(Sustainable Transport)**
  - 10. To ensure that everyone has the opportunity to live in a good quality, affordable home, suitable to their need and which optimises the scope for environmental sustainability. **(Housing)**
  - 11. To address the causes of climate change through reducing emissions of greenhouse gases and the consequences through adaptation measures. **(Climate Change Mitigation)**

12. To encourage development of the rural economy in a manner that balances agricultural and other business interests to maintain a living, valued landscape. **(Rural Economy)**

1.8 The second document was the SA Report to accompany the Options Consultation Document for the Local Plan. Both documents can be accessed at the National Park Authority's website at:

<http://www.southdowns.gov.uk/planning/planning-policy/national-park-local-plan/evidence-and-supporting-documents/>

1.9 The purpose of this third SA Report is to:

- identify, describe and evaluate the likely significant effects of the Preferred Options for the Local Plan and any reasonable alternatives; and
- identify the measures that may be needed to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the Local Plan; and
- provide an opportunity for statutory consultees, interested parties and the public to offer views on any aspect of the SA process.

1.10 The main focus of this report is the testing of reasonable alternative, both in terms of the policies and the spatial strategy (i.e. the distribution and level of housing being proposed).

**The appraisal of alternative approaches for the Preferred Options Local Plan.**

**a) Scale and distribution of housing development (Spatial Strategy)**

1.11 An important element of the Local Plan's development has been the consideration of different levels and distributions of housing across the National Park. These options were developed with the aim of assessing the various growth scenarios that emerged from the Strategic Housing Market Assessment (SHMA) and from the current land supply availability as set out in the Strategic Housing Land Availability Assessment (SHLAA). The SA allows for an assessment of these scenarios against the range of sustainability objectives established at the scoping stage. It is therefore through this work that the Local Planning Authority is able to consider what the impacts of the varying levels and distributions of growth might be on the National Park.

1.12 The alternative strategies considered to date are as follows:

<b>Number of homes allocated over plan period</b>	<b>Dispersed</b>		<b>Concentrated</b>
	Homes allocated to a wide range of settlements across the National Park.		Homes concentrated in Petersfield, Lewes, Midhurst, Liss and Petworth.
<b>Low (1,720)</b>	Dispersed Low		Concentrated Low
<b>Medium (2,578)</b>	Dispersed Medium	Dispersed Medium, Sustainable Transport	Concentrated Medium
<b>High (3,760)</b>	Dispersed High		Concentrated High

1.13 These scenarios combine a range of housing growth options, from low to high numbers with two ways of distributing the development, i.e. in a concentrated manner directing it to only the most sustainable settlements, or in a more dispersed manner allocating it across a range of settlements throughout the National Park.

- I.14 In addition to this, a scenario of dispersing a medium number of homes to those communities with access to sustainable transport infrastructure was also considered.
- I.15 The figures being tested combine the outputs of the SHMA with the work on identifying sites for allocation and the known certainties provided by the existing Joint Core Strategies. These Core Strategies in some cases provide a 'cap' to the level of housing development considered appropriate. It would therefore be unreasonable to test anything higher.
- I.16 Detailed testing of those highlighted in grey in the table has taken place as part of the SA of the Preferred Options: Local Plan. The emerging results of the SA work indicate that dispersed medium approach will assist in delivering the evidence-based housing requirement for the National Park, whilst resulting in minimal impact upon the landscape character. The dispersed medium scenario is the approach proposed within the Local Plan: Preferred Options. This approach reflects feedback from communities and workshops that the smaller villages and settlements of the National Park should not be allowed to stagnate. The SA report will set out the implications of all four scenarios in detail.

### **Policy approaches**

- I.17 The SA appraises the policies in the: Local Plan: Preferred Options against the range of sustainability objectives. The results of this work are a series of recommendations / mitigation measures for the SDNPA to consider as it prepares the pre-submission Local Plan though the remainder of this year and into next. Some of the recommendations made to date are:
- Policy SD31; Sustainable Construction; include a carbon reduction target for residential developments;
  - Policy SD25; Rural Exception Sites; Include a requirement for sites to be immediately adjacent to existing settlements or readily accessible to them via sustainable modes of transport;
  - Policy SD20 / 21; when does the benefit of tourism outweigh the risks? When does tourism become unsustainable?
  - Expand policy SD23 to specifically address the provision of housing for older people.

### **Strategic sites and site allocations**

- I.18 In addition to testing the spatial strategy options the SA has also tested the actual wording of the proposed strategic site policies and the smaller site allocations against the range of sustainability objectives. At this stage only those sites that are included within the Preferred Options Local Plan have been tested. Following the completion of the Preferred Options consultation (which includes a further call for sites), further assessment will take place, including of those sites not included within the Plan.
- I.19 The results of this work are a series of recommendations / mitigation measures for the SDNPA to consider as it prepares the pre-submission Local Plan though the remainder of this year and into next. Some of the recommendations made to date are:
- Strategic Site Policy SD32 (Shoreham Cement Works): Amended policy to facilitate the implementation of a comprehensive green infrastructure strategy for the site; include a requirement for a flood risk assessment and a surface water drainage strategy.
  - Strategic Site Policy SD34 (North Street Quarter and adjacent Eastgate area, Lewes): Amend policy to more explicitly seek to minimise effects on nature conservation designations nearby.
  - Policy SD-WW11 (Land at Brookland Way, Coldwaltham): The effects on biodiversity will need to be further considered through the next stages of plan development.

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- Policy SD-DS01 (Land between Church Lane and the A273, Pyecombe): Recommend the implementation of green infrastructure measures; need to limit effects of noise and air quality.

### **Next steps**

- I.10 The SA report to accompany the Preferred Options: Local Plan is being finalised by Aecom. Comments on the SA report received during the consultation period will inform the next stage in the preparation of the Local Plan.