



Site Selection Topic Paper

(Including Assessment of Site Allocations against Major Development Considerations)

South Downs Local Plan 2024-42

(Regulation 19)

MARCH 2026

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Introduction

1. The existing South Downs Local Plan was adopted in July 2019. In line with planning regulations and the National Planning Policy Framework (NPPF), the South Downs National Park Authority (the Authority or SDNPA) is preparing a new Local Plan.
2. The new Local Plan will determine the overall strategy for future development across the South Downs National Park for at least 15 years from adoption, anticipated in 2027 (plan period: 2024 to 2042), including addressing housing need.

Purpose of the Paper

3. This Paper outlines the context and basis upon which the proposed new site allocations in the Regulation 19 Local Plan have been selected. It summarises the process taken in identifying sites for allocation of new housing, including other development uses where a mixed use is proposed.
4. This Paper should be read alongside the Local Plan evidence base including the Housing and Economic Development Needs Assessment and Addendum, Gypsy, Traveller and Travelling Showpeople Accommodation Assessment and Site Identification Report, Land Availability Assessment and Employment Land Review.
5. The decision to include a site for allocation is based on professional judgement, relevant and evidential technical studies (“the evidence base”); and consultation responses and evidence submitted during the Regulation 18 public consultation.
6. All the allocations have been made in line with the new Local Plan spatial strategy for a landscape capacity-led level of development dispersed across the most sustainable towns and villages of the National Park. All the proposed sites identified for allocation are subject to Sustainability Appraisal and Strategic Environmental Assessment (combined within the Integrated Impact Assessment).

National Park Purpose and Special Qualities

7. The purposes of National Parks are to:
 - To conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and
 - To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

National Park Authorities also have a duty when carrying out these purposes to seek to foster the economic and social well-being of communities within the National Park.

8. The provision of an appropriate quantum of market and particularly affordable housing in the South Downs National Park through suitable allocations in the Local Plan should support its future social and economic sustainability.

National Policy and Guidance context

National Planning Policy Framework (NPPF) December 2024

9. The new Local Plan is to be examined against the December 2024 version of the NPPF. This sets out that plans should achieve sustainable development. NPPF paragraphs 82-83 sets out that in rural areas, local planning authorities should be responsive to local circumstances and plan housing development reflecting local needs, particularly for affordable housing; and that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.
10. NPPF paragraph 187 sets out that the allocation of land for development should prefer land of lesser environmental or amenity value, where consistent with other policies. NPPF paragraph 189 reflects the National Park Purposes in that great weight should be given to conserving and enhancing the landscape and scenic beauty and to the conservation and enhancement of wildlife and cultural heritage in National Parks, and that the scale and extent of development should be limited and sensitively located and designed to avoid or minimise adverse impacts.
11. NPPF paragraph 190 sets out that planning permission should be refused for major development in National Parks other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest. A summary of the Assessment of Site Allocations against Major Development Considerations is provided in Paragraphs 73-77 below, and in full in Appendix A. This considers if the proposed site allocations could be regarded as major development under the terms of NPPF 190 and, if so, whether they meet the tests for exceptional circumstances and would be in the public interest.
12. NPPF paragraph 72 explains that local planning authorities should have a clear understanding of the land available in their area for development through the preparation of a **Land Availability Assessment** and, from this, that planning policies should identify a sufficient supply and mix of 'deliverable' sites to provide five years' worth of housing, and 'developable' sites to provide a supply of housing over the longer term.
 - To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that development will be delivered on the site within five years.
 - To be considered developable, sites should be in a suitable location for development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.
13. The Planning Practice Guidance sets out how local authorities should support sustainable rural communities by recognising the issues facing rural areas in terms of housing supply, affordability and the role of housing in supporting the broader sustainability of villages and smaller settlements; and that all settlements can play a role in delivering sustainable development in rural areas. It also underlines that NPPF policies for protecting National Parks may mean that it is not possible to meet objectively assessed needs for development in full through the plan-making process, and that National Parks are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas.

English National Parks and the Broads: UK Government Vision and Circular 2010

14. The purpose of the Circular is to provide policy guidance on National Parks in England. The Circular sets out in paragraphs 28 and 76-79 that National Park Authorities have a key role, as planning authorities, in the delivery of affordable housing. A lack of affordable housing in National Parks can have a detrimental effect on the local economy and undermine the social networks that are key components of sustainable rural communities. The expectations set out in the Circular are that National Parks are not suitable locations for unrestricted housing and that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services.
15. The Circular also sets out in paragraphs 68-75 that National Park Authorities must ensure that, in their work furthering National Park Purposes, that they give sufficient weight to socio-economic interests including providing employment. The Circular recognises that National Park Authorities can play a catalytic role in maintaining thriving rural economies through fostering an appropriate planning regime, encouraging new development to broaden the economic base and fostering more diverse and higher-value local employment opportunities.

Local Policy Context

South Downs National Park Partnership Management Plan 2026-2031

16. The [Partnership Management Plan 2026-31 - South Downs National Park Authority](#) is the overarching five-year strategy for the management of the South Downs National Park. It guides the actions not just of the National Park Authority but all those partner organisations and individuals whose activities impact on the National Park.
17. The Partnership Management Plan provides a framework for the new Local Plan and was itself reviewed during 2025 to cover the period 2026-2031. It includes an overarching Vision for 2060 and has 'Principles for Delivery' which include planning principles that cover the Authority's land use planning functions. These planning principles have been re-purposed as the objectives for the Local Plan to ensure that there is a tangible and effective link between these two important Plans for the National Park.
18. The Local Plan is a spatial plan for development (such as housing, economic activity, and renewable energy) in the National Park. The Local Plan sets out where development should happen, what sort of place it creates and what it should look like, and how it will contribute to the purposes of the National Park. The Local Plan is a means of delivering aspects of the Partnership Management Plan which is a material consideration in planning decisions.

Evidence base

19. The site assessment and selection process is informed by relevant appraisals, assessments and evidence studies which support the Draft Local Plan. These include:
 - Integrated Impact Assessment (incorporating Sustainability Appraisal/Strategic Environmental Assessment/ Equalities Impact Assessment (EqIA)/ Health Impact Assessment (HIA))
 - Habitats Regulation Assessment (HRA)
 - Land Availability Assessment (LAA)
 - Housing and Economic Development Needs Assessment and Addendum (HEDNA)

- Employment Land Review (ELR)
- Gypsy and Traveller Accommodation Assessment (GTAA) and Site Identification Report
- Settlement Facilities Study (SFS)
- Transport Study (TS)
- Strategic Flood Risk Assessment (SFRA)

20. These are outlined below at each relevant stage of the **Site Selection Process**.

21. The **Employment Land Review** (January 2026) shows that current overall supply broadly meets the needs identified in the HEDNA, therefore new employment uses have only been allocated where they form part of a mixed-use scheme and support the sustainability of that allocation. However, the balance between uses requires correcting as there is a surplus of industrial land and a shortage of office land. Policy changes are therefore included in policy SDE1 (previously SD35) to facilitate changes of use between industrial buildings and offices, as well as other policies which support the continuing delivery of windfall employment sites (such as through the conversion of rural buildings). This Site Selection Paper therefore only addresses employment where it forms part of mixed-use housing allocations.

22. The **Gypsy and Traveller Accommodation Assessment** (GTAA) December 2024 assesses the need across the whole of the South Downs National Park. It pulls together the outcomes of existing GTAAs for different parts of the National Park and updates them for the plan period, while also carrying out a more detailed refresh for the areas of Brighton & Hove City Council, and Adur and Worthing Councils. The Site Identification Report sets out how potential sites have been identified and assessed and the Regulation 19 Proposed Submission Local Plan includes the sites to contribute to the needs in the GTAA.

Site Selection Process

Overview

24. Decisions on the proposed new site allocations are informed by evidence and professional judgment. Essentially, the process is iterative - informed by national policy, evidence studies (including desktop analysis and site visits), and consultation responses throughout the preparation of the Local Plan - weighing all identified factors together to determine the most appropriate site allocations to deliver the development strategy of the Local Plan.
25. In line with the recommendations of the Integrated Impact Assessment on an appropriate spatial strategy for the Local Plan, development is supported: in and adjacent to primary settlements that have the most sustainability credentials within the National Park; in and adjacent to the most sustainable rural settlements within the National Park; and adjacent to settlements on the boundary of the National Park which are identified in neighbouring local plans as sustainable. The above will support the urban and rural economies, help to sustain infrastructure and services, and provide quality and choice of housing for existing and new residents. The list of sustainable settlements appropriate for such infill and extensions (both within and on the boundary of the National Park) was tested through a refresh of the Settlements Facilities Study and are listed in policy SDC2 of the Regulation 19 Proposed Submission Local Plan.
26. Wherever possible, site allocations comprising previously developed land have been prioritised. Focusing new development in or adjacent to settlements wherever previously developed land is available not only helps protect the landscape of the National Park but also complements efforts to encourage the appropriate improvement of the built environment via redevelopment and conversion of vacant and/or underutilised sites and buildings.
27. The Land Availability Assessment found a limited supply of sites on previously developed land, or sites within settlement boundaries as defined in current development plan documents. This limited supply will not address the housing needs of the area. As such, the Land Availability Assessment has considered all sites adjacent to, but outside, defined settlement boundaries and previously developed land across the National Park. It has also considered sites adjacent to sustainable settlements that are outside the National Park but abut its boundary.
28. The scale of individual sites in relation to the size of a host settlement is an important factor if the existing character of a settlement is to be maintained and development is to be successfully integrated over time. Cumulative effects of more than one allocation in a settlement, together with any unimplemented existing allocations, has been tested through the Integrated Impact Assessment.
29. This Paper focuses on the site selection process for residential allocations (C2 and C3 in the Use Classes Order). The Employment Land Review covers the issue of meeting needs for employment land, and the Gypsy and Traveller Site Identification Report explains the need and site selection methodology for traveller pitches and travelling showpeople plots.

Site selection process

30. The selection process for residential allocations in the new Local Plan was undertaken in three Steps, informed by relevant appraisals, assessments, site visits and evidence studies:

- **Step 1: Identification of sites with development potential through the Land Availability Assessment**
- **Step 2: Consideration of Site Assessments through the Land Availability Assessment**
- **Step 3: In-Combination Testing in the Integrated Impact Assessment**

31. The site selection process has determined the most sustainable, deliverable and developable sites in accordance with the NPPF. This has ensured that the process is consistent with the principles of sustainable development and maintaining the purposes of the National Park.

32. This Section explains the steps undertaken at each stage.

Step 1 Identification of sites with development potential through the Land Availability Assessment

33. The NPPF in paragraph 72 requires all strategic policy-making authorities to have a clear understanding of the land available in their area through the preparation of a Land Availability Assessment (LAA).

34. The Authority has prepared and updated the LAA to support the new Local Plan. This included a review of the methodology to ensure it complies with Planning Practice Guidance and reflects best practice. The geographical area covered by the LAA is the South Downs National Park which covers parts (but not the entirety) of 12 borough/district/unitary local authority areas.

35. The LAA includes:

- Sites identified in the 2015/16 Strategic Housing Land Availability Assessment (SHLAA) that supported the preparation of the adopted South Downs Local Plan (2019);
- Sites identified during the 2022 Call for Sites, 2023 Call to Local Authorities, and 2025 Regulation 18 consultation of the draft South Downs Local Plan;
- Sites identified during the Authority's site searches in 2023 and 2025; and
- Sites identified outside of the above sources between January 2017 and October 2025.

36. The full LAA methodology and assessment criteria is available to view on the SDNPA website at [Land Availability Assessment - South Downs National Park Authority](#)

37. The LAA identified 799 sites for single-use or mixed-use development. This formed an initial pool of sites for assessment and consideration in the new Local Plan.

38. Stage 1 of the LAA provided an initial sieve of the identified sites. Some sites were excluded at Stage 1 because they were located within designated sites (such as Sites of Special Scientific Interest), on greenfield sites that were not adjacent to settlement boundaries, or were incapable of meeting the minimum threshold of 5 dwellings. The sites not "excluded" at Stage 1 were then progressed to Stage 2 of the LAA – see below.

Step 2: Consideration of Site Assessments through the Land Availability Assessment

39. All sites not "excluded" from the initial sieve were subject to detailed assessments in Stage 2 of the LAA. To assess each site consistently and develop a shortlist of deliverable / developable sites for further consideration in the new Local Plan, assessment criteria - including key characteristics and special qualities of the National Park, landscape considerations and impacts,

relevant land designations, constraints, access to services, infrastructure and transport - were used and considered as set out in LAA Appendix A.

40. The sites “rejected” at Stage 2 of the LAA have not been subject to further assessment, and have not been tested as ‘development scenarios’ in the Integrated Impact Assessment and other evidence testing at Step 3 because they are not considered reasonable alternatives to the proposed allocations.
41. All sites that progressed passed Stage 2 of the LAA have been assessed as ‘has potential’ for development. Further consideration, detailed testing, and due diligence of the ‘has potential’ sites have been carried out as these sites have the greatest potential for allocation in the new Local Plan.
42. A provisional Land Availability Assessment was published in November 2024. In this, 122 sites were assessed as ‘has potential’ for development. This included unimplemented allocations in the adopted South Downs Local Plan 2019 to be carried over into the new Local Plan (subject to changes as appropriate); unimplemented allocations in made Neighbourhood Development Plans; and sites subject to extant planning permission where the principle of development has been established. In focusing on sites that were not subject to existing allocations and/or extant planning permissions, this left 51 sites for consideration in the draft Local Plan. Of these, 48 sites were proposed as potential residential allocations in the Regulation 18 public consultation. This left a very small pool of 3 sites that were assessed as ‘has potential’, but were not proposed for allocation for the following reasons:

LAA Reference	Site	Settlement	Status
HO039 (now HO057)	Land at East Street Farm (Bottom Field)	Amberley	This field was omitted from the Regulation 18 Local Plan as it was considered that the other two fields to the north were more appropriate for development. However, further investigations have resulted in this field being included in the overall East Street Farm site at Regulation 19 stage – see Policy SDA35.
EA177	Land at Quin Hay Farm	Froxfield	This site was promoted for residential use as part of a mixed development but is considered more suitable for employment uses, which could come forward under Policy SDE1 (previously SD35).
EA199	Lords Farm, Waterworks Road	Sheet	This site was promoted for residential use as part of a mixed development. It is considered suitable primarily for employment uses. However, subdivision of the dwellinghouse could come forward under Policy SDH7 (previously SD30).

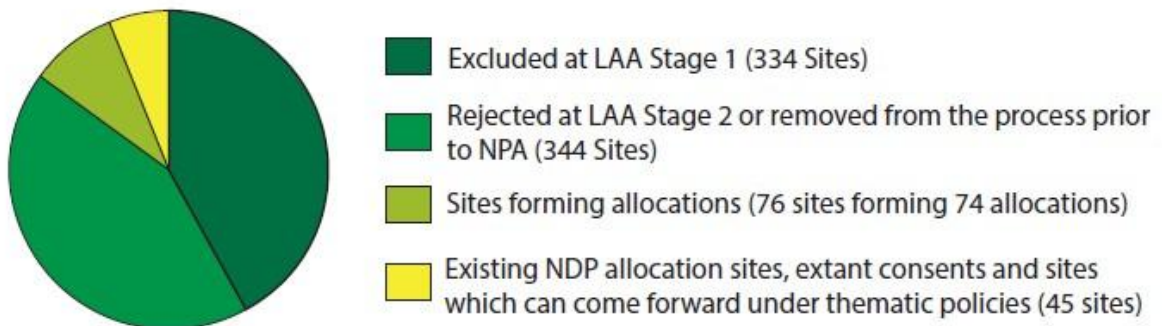
43. The Regulation 18 public consultation was carried out between January and March 2025 and provided site promoters, consultees and residents with an opportunity to comment on the provisional Land Availability Assessment and proposed site allocations. Around 1,900 individuals and organisations responded to the consultation, making over 3,700 individual comments. This included 2,135 comments on proposed site allocations, promotion of 28 brand new sites, and submission of further information about 38 existing sites that had either been “excluded” or “rejected” in the provisional Land Availability Assessment of November 2024.
44. All comments and information were considered thoroughly and further investigations carried out, including requests for site promoters to submit additional information to address raised and identified issues. The Land Availability Assessment was updated, finalised and published in December 2025. In this, 123 sites were assessed as “has potential” for development. This included 32 unimplemented allocations in made Neighbourhood Development Plans and 13 sites subject to extant planning permission, which are treated as existing ‘commitments’, leaving a very small pool of 6 sites that were assessed as ‘has potential’ but are not proposed for allocation for the following reasons:

LAA Reference	Site	Settlement	Status
EA177	Land at Quin Hay Farm	Froxfield	This site was promoted for residential use as part of a mixed development but is considered more suitable for employment uses, which could come forward under Policy SDE1 (previously SD35).
EA199	Lords Farm, Waterworks Road	Sheet	This site was promoted for residential use as part of a mixed development. It is considered suitable primarily for employment uses. However, subdivision of the dwellinghouse could come forward under Policy SDH7 (previously SD30).
HO051	Land north of North Farm	Washington	This site was promoted for employment / commercial uses which could come forward under Policy SDE1 (previously SD35).
HO052	Land at Hardham Mill	Coldwaltham	The site was promoted for employment / commercial uses which could come forward under Policy SDE1 (previously SD35).
LE185	Land north of North Industrial Estate, New Road	Newhaven	The site was promoted for open storage for adjacent recycling operations. This type of development should be assessed and considered in a waste local plan.

LAA Reference	Site	Settlement	Status
LE114	Land rear of 49-53 St Anne's Crescent	Lewes	Since the publication of the LAA the site has been confirmed to be unavailable.

45. In summary, the Land Availability Assessment considered **799** sites for residential and/or economic development.
- **334** were excluded at Stage 1 because they were located within designated sites (such as Sites of Special Scientific Interest), on greenfield sites that were not adjacent to settlement boundaries or were incapable of meeting the minimum threshold of 5 dwellings;
 - **465** sites were considered at Stage 2;
 - **344** sites were “rejected” as being unsuitable, unavailable and/or unachievable for development;
 - **123** were assessed as “has potential” for development. This included **32** unimplemented allocations in made Neighbourhood Development Plans and **13** sites subject to extant planning permission, which are treated as existing ‘commitments’;
 - **6** of the remaining sites were not proposed for allocation because they could come forward under existing thematic policies, were considered more appropriate for other uses, or had subsequently been found to be unavailable; and
 - This left **76** residential/employment sites proposed for allocation in the new Local Plan (74 allocations due to some including more than 1 LAA site).

The diagram below represents the above in a pie chart.



Step 3: Development Scenario / In-Combination Testing

46. While site assessments at Steps 1 and 2 are carried out on an individual site basis, Step 3 includes testing the proposed site allocations ‘in-combination’ with each other and existing unimplemented allocations at the same settlement through the Integrated Impact Assessment (incorporating Sustainability Appraisal).

Integrated Impact Assessment

47. The **Integrated Impact Assessment** considers the requirements and scope of:
 1. Sustainability Appraisal (including Strategic Environmental Assessment)
 2. Equalities Impact Assessment
 3. Health Impact Assessment
48. The Integrated Impact Assessment (IIA) is a key part of the evidence base for the new Local Plan to promote sustainable development, and address health and equality issues through better integration of social, environmental and economic considerations into the preparation of the Plan. To ensure this is effective, the IIA process is fully integrated into the plan-making process. It is applied at each stage of plan preparation and will be used to monitor the effectiveness of the Plan during its implementation.
49. The Sustainability Appraisal element is a systematic process that must be carried out during the preparation of a Development Plan. Its role is to promote sustainable development by assessing the extent to which the Plan, when judged against all reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. This allows for the consideration of opportunities to improve environmental, social and economic conditions in the local area and identify how to mitigate the impact of development.
50. The new sites assessed as ‘has potential’ through Steps 1 and 2 have been assessed against the Integrated Impact Assessment (Sustainability) Framework to consider the sustainability credentials of each site independently, as well as cumulatively with remaining (unimplemented) allocations in the adopted South Downs Local Plan and made Neighbourhood Development Plans on a settlement-by-settlement basis. This process has, therefore, informed the choices made and has identified where mitigation and addressing key impacts can be included in development criteria. The resulting policy for each proposed site allocation will ensure negative impacts are mitigated and positive impacts are improved.

Habitats Regulations Assessment

51. The IIA does not include a **Habitats Regulations Assessment** (HRA) but accounts for its findings. The HRA of Local Plans is required by the Conservation of Habitats and Species Regulations to meet the requirements of the Habitats Directive. A screening assessment is carried out to identify likely significant effects of European nature conservation sites (a European site), i.e. Special Protection Areas, Special Areas of Conservation and Ramsar sites.
52. The purpose of the screening is to:
 - Identify all aspects of the Plan which would have no effect on a European site, so that they can be eliminated from further consideration in respect of this and other plans
 - Identify all aspects of the Plan which would not be likely to have a significant effect on a European site (i.e. would have some effect, because of links/connectivity, but which are not significant), either alone or in combination with other plans or projects, and

which therefore do not require ‘appropriate assessment’

- Identify those aspects of the Plan where it is not possible to rule out the risk of significant effects on a European site, either alone or in combination with other plans or projects. This provides a clear scope for the parts of the Plan that will require ‘appropriate assessment’.
53. Where proposed site allocations are deemed to have likely significant effects on a European site, and the subsequent appropriate assessment does not identify any suitable mitigation to address these effects, this would result in the site not being taken forward as an allocation in the new Local Plan.
54. The HRA to be published alongside the Regulation 19 Local Plan identifies a number of likely significant effects with the proposed site allocations but does not recommend any are removed from consideration as allocations. Instead, it makes recommendations for any necessary mitigation, which are included within Policies SDN3-7. The site allocations where these measures will apply are identified in their criteria and supporting text.

Other evidence

Transport Study

55. The **Transport Study** identifies the potential impacts of growth, considering packages of sustainably focused measures required to achieve the most sustainable outcomes for the preferred development option. It considers the potential impacts of the preferred growth strategy and identifies the package of measures required to increase sustainable transport use and reduce the impact of private cars. A separate Transport Assessment has been undertaken for Shoreham Cement works.

Water Cycle Study

56. The **Water Cycle Study** provides an assessment of the impact of the new Local Plan development strategy on water infrastructure and the water environment. The Study looks at water supply and identifies significant water stress in the area, noting that current Water Resource Management Plans are based on lower growth predictions than are coming forward in new and emerging Local Plans. In terms of wastewater the report notes that 13 of the 45 wastewater treatment works are likely to be close to capacity during the plan period due to already committed development, excluding growth from future allocations and any planned upgrades. Policy recommendations are included which have been incorporated into the Regulation 19 Local Plan.

Strategic Flood Risk Assessment (SFRA)

57. The **Strategic Flood Risk Assessment** identifies the areas within the National Park at risk of flooding from all sources and assesses the proposed allocations against this information. A sequential test (and where necessary exception test) will then be applied to the proposed allocations and will be published with the Regulation 19 Local Plan.

Conclusion on Site Selection

58. This Paper sets out information on the key factors and key studies that have influenced the selection of sites and summarises the process of site selection. It is not exhaustive and does not seek to set out in detail all the information drawn from the relevant evidence base studies, site

research or explain individual site choices.

59. This Paper outlines the robust and transparent process used in the selection of sites for inclusion in the development strategy of the new Local Plan. The process enables evidence-based decisions to be made on the most sustainable development strategy for the National Park.
60. Step 1 identified 799 sites while the detailed assessments of Step 2 resulted in 123 of these sites being assessed as 'has potential' for development. In Step 3, the Integrated Impact Assessment then considered the cumulative impact of proposed new site allocations with any existing site allocations on a settlement-by-settlement basis, and assessed the proposed site allocations against the sustainability objectives. This process did not result in any proposed sites being discounted, but rather led to recommendations on policy criteria to accompany their allocation to mitigate identified potential impacts.
61. The above process has resulted in **74** proposed residential allocations in the Regulation 19 Local Plan (this does not include sites allocated solely for employment use or traveller accommodation). Together, the proposed residential allocations have an indicative capacity of **3,559** homes comprising **1,660** homes from carried over site allocations in the South Downs Local Plan 2019 and **1,899** homes on brand new site allocations.

Other Contributions to Housing Supply

Completions, Extant Planning Permissions and Unimplemented Neighbourhood Development Plan Allocations

62. The plan period for the new Local Plan commences on 1st April 2024 so any completions after this date, together with any extant planning permissions, contribute to the overall housing supply figure. These amount to **247** completions and **788** extant permissions (the latter figure excludes any allocation sites to avoid double-counting).
63. Also relevant are any unimplemented allocations in made Neighbourhood Development Plans. These remain part of the statutory development plan and are mostly unaffected by the new Local Plan. The exception is Site H7 in the Petworth Neighbourhood Development Plan, which has been incorporated into the new allocation SDA25 Land south of Herbert Shiner School, Petworth. This overlap has been accounted for in the numbers. The total capacity of unimplemented allocations in made Neighbourhood Development Plans is **957** homes.

Windfall Allowance

64. Not every development can be anticipated at plan-making stage. The development plan includes thematic policies which allow development to come forward without specific allocations. This includes infill development within settlement policy boundaries as well as new dwellings justified in the countryside, sub-division of single dwellings to create additional units, and conversion of rural buildings to new homes. Such development is accounted for in the projected housing supply by including a 'windfall allowance'.
65. NPPF paragraph 75 says that "Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source

of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends”.

66. Appendix B shows the historic delivery of windfall development from sites of 1-4 homes over the last ten years. This threshold was chosen to avoid any double-counting with the sites identified in the Land Availability Assessment, which only considers sites with the capacity to accommodate 5 net additional homes or more. This spreadsheet demonstrates a historic delivery of an average of 74 homes per year. It is considered realistic that this trend will continue given that the new Local Plan provides more opportunities for unallocated development to come forward under Policy SDC2. No windfall allowance has been assumed for the first three years of the plan period to avoid double-counting with extant permissions, therefore an overall windfall allowance of **1,184** homes (16 years x 74 dwellings windfall per annum) from 2027-2042 is included within the housing supply.

Overall Housing Supply and Trajectory

67. Policy SDH1 of the Regulation 19 Local Plan sets out the proposed housing provision number of **6,137 new homes** (or **323 homes per year**) between 2024/5 and 2042/3. As explained above, this comprises:

Completions after 1 st April 2024 - 31 st March 2025	247
Extant Planning Permissions*	788
Unimplemented allocations in made Neighbourhood Development Plans	957
Unimplemented allocations carried over from the 2019 Local Plan	1,660
Allocations in this Local Plan	1,899
Windfall Allowance	1,184
Total	6,735**

* Planning permissions that are completed or are unimplemented allocations are omitted from this figure to avoid double-counting. However, allocated sites that are under construction are included.

** This supply figure incorporates 598 homes ‘headroom’ for flexibility

68. This provides for the identified needs in the Housing and Economic Development Needs Assessment and Addendum of 323 homes a year, with headroom of 598 homes over the plan period or approximately 10% for flexibility in case any planned allocations do not come forward.
69. The trajectory in Appendix C shows how this supply is projected to be delivered over the plan period. This takes into account the planning status of sites (such as whether they already have full or outline planning permission), the complexity of any issues to be overcome ahead of delivery and the likely build-out rate of larger sites once they have commenced.
70. In assessing whether sites are likely to form part of delivery within the first five years after the adoption of the Local Plan (i.e. before 2032), regard has been given to the advice in the Planning Practice Guidance that, to be considered deliverable, sites for housing should be “available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within 5 years. In particular:
- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission should be considered deliverable until permission expires,

unless there is clear evidence that homes will not be delivered within 5 years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within 5 years”.

71. The NPPF also requires local planning authorities to identify a supply of specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15. Plan-makers need to demonstrate that there is a reasonable prospect that they are likely to come forward within the timescale envisaged. All of the sites identified in the Regulation 19 Local Plan are considered suitable, available and achievable. However, some are complex sites where there are issues such as land remediation (in the case of Shoreham Cement Works) or uncertainty around the implications of devolution and local government reorganisation (in the case of East Sussex County Hall, Lewes). These sites are assumed to be more likely to be delivered in years 11-15, although policies do not prevent them from coming forward earlier.
72. Overall, the trajectory in Appendix 3 demonstrates a robust 5-year housing land supply of **9.95 years** from projected adoption of the new Local Plan in 2027, including previous under-supply against the 2019 Local Plan and a 5% buffer.

Assessment of Site Allocations against Major Development Considerations

73. This Assessment was made to determine whether proposed housing allocation sites comprised ‘major’ development in line with the NPPF Paragraph 190 and, if so, whether they meet the tests for exceptional circumstances and in the public interest. This is appended to this Background Paper and summarised below.
74. The Assessment identified the following proposed sites as potentially comprising major development by virtue of their nature and scale:

Proposed Local Plan Allocation	Details
SDA1 - North Street Quarter, Lewes, comprising Phoenix Area, Former Bus Station, and Eastgate Wharf	770 homes / 4,098 sqm commercial / hotel / other supporting uses
SDA2 – Old Malling Farm, Lewes	226 homes
SDA4 – East Sussex County Hall, St Anne’s Crescent, Lewes	200 homes / 3,500sqm office and community uses
SDA5 - East Sussex College, Mountfield Road, Lewes	200 homes
SDA25 - Land south of Herbert Shiner School, Petworth	175 homes (including 100 homes allocated in the Petworth Neighbourhood Development Plan).
SDA30 - Shoreham Cement Works	400 homes / 62,000 sqm employment / 4,000 sqm of other supporting uses
SDA31 – Land west of Liphook / Land at Westlands Park, Liphook	380 homes / 65-bed care home (equating to 414 C3 overall) / 14 traveller pitches / other supporting uses

75. However, following further assessment against the criteria of setting and potential impact on National Park purposes, SDA4 and SDA5 are not considered to be major development. The reasoning is summarised as follows:

Proposed Local Plan Allocation	Stage 1 Assessment Summary
SDA4 – East Sussex County Hall, St Anne’s Crescent, Lewes	Not considered major development. The proposed allocation would have limited impact on the Special Qualities of the NP as it is contained within the defined settlement boundary on a well located and previously developed and managed site, and development would be of a scale commensurate with existing development and character of the settlement and historical surroundings, in an area of uncharacteristic and moderate landscape sensitivity.
SDA5 - East Sussex College, Mountfield Road, Lewes	Not considered major development. The proposed allocation would have limited impact on the Special Qualities of the NP as it is mostly contained within the defined settlement boundary on a well located and previously developed and managed site, and development would be of a scale commensurate with existing development and character of the settlement and surroundings, in an area of uncharacteristic and low landscape sensitivity.

76. The remaining strategic allocations were assessed against the criteria in NPPF 190, and it was considered that there are exceptional circumstances to justify their allocation in the public interest. The reasons are set out below:

NPPF Para 190 Criteria	SDA1 North Street Quarter, Lewes, comprising Phoenix Area, Former Bus Station, and Eastgate Wharf	SDA2 Old Mall Farm, Lewes	SDA25 Land south of Herbert Shiner School, Petworth	SDA30 Shoreham Cement Works	SDA31 Land west of Liphook / Land at Westlands Park, Liphook
a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;	The need for additional homes within the National Park is set out in the Housing and Economic Development Needs Assessment (HEDNA) Addendum as 323 dwellings per annum (or 6,137 homes between 2024 and 2042). It would not be possible to meet this need without the 2,185 homes provided on these major development sites. The employment provision on SDA1 and SDA30 is also an important contributor to meeting the needs in the HEDNA. Failure to meet these needs would be detrimental to the economic and social wellbeing of communities within the National Park.				
b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and	The whole local planning authority area is within the designated area of the National Park, so developing outside would require the cooperation of neighbouring local planning authorities, which have their own challenges in meeting high levels of housing needs. The Land Availability Assessment has stringently tested all potential sites within the National Park and has not identified sufficient smaller scale sites to meet the needs set out in the HEDNA without utilising major development sites.				
c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.	Recent planning history has demonstrated that it is possible to achieve acceptable development on this site without detrimental effects that cannot be moderated.	Recent planning history has demonstrated that it is possible to achieve acceptable development on this site without detrimental effects that cannot be moderated.	Preliminary design work indicates that the environmental effects of development on this site can be moderated and benefits achieved.	Preliminary design work indicates that the environmental effects of development on this site can be moderated and benefits achieved.	Preliminary design work indicates that the environmental effects of development on this site can be moderated and benefits achieved.
Summary	It is considered that there are exceptional circumstances that justify the allocation of these sites and that they are in the public interest.				

77. The above assessments will need to be revisited at planning application stage when further details are known. The full **Assessment of Site Allocations against Major Development Considerations** is appended to this Paper as Appendix A.

Appendix A - Assessment of Site Allocations against Major Development Considerations

Introduction

- A1. The purpose of this Assessment is to demonstrate that national planning policy on major development in designated landscapes has been fully considered in the preparation of the Local Plan. It sets out an approach to assess if the proposed residential site allocations could be regarded as major development and, if so, whether it meets the tests for exceptional circumstances and in the public interest to justify such development in a National Park.
- A2. Each proposed site allocation is assessed as a matter of planning judgement considering national policy. It is important to note that the process of determining whether a site is suitable for allocation in the Local Plan is made through the site selection process for the Local Plan and is a separate decision-making process.
- A3. The major development assessment process will help meet the statutory purposes and duties for the National Park which are:
- To conserve and enhance the natural beauty, wildlife and cultural heritage of the area
 - To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public
- A4. National Park Authorities also have a duty when carrying out these purposes to seek to foster the economic and social well-being of communities within the National Park.
- A5. The National Planning Policy Framework (NPPF) provides Government policy for conserving and enhancing landscape beauty. Paragraph 190 sets out that planning permission should be refused for major development in National Parks other than in exceptional circumstances and where it can be demonstrated the development is in the public interest. Consideration of such applications should include an assessment of:
- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
 - b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
 - c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

Definition of Major Development

- A6. The NPPF does not define what constitutes major development in the National Park. Footnote 67 of the NPPF says that “For the purposes of paragraphs 190 and 191, whether a proposal is ‘major development’ is a matter for the decision maker, taking into account its nature, scale and setting and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined”.
- A7. The South Downs National Park Authority sought legal advice on the matter from James Maurici KC in 2011 and 2014 (now known as the ‘Maurici opinions’) and subsequently from Toby Fisher in 2017.
- A8. The Maurici opinions set out a series of principles (derived from caselaw, guidance and appeal decisions) to be applied by decision makers when determining whether a proposed development could be regarded as major development:
- It is a **matter of planning judgement to be decided by the decision maker** considering all the circumstances and the context of the site.
 - **The phrase “major development” is to be given its ordinary meaning.** It would be wrong to apply the definition of major development contained within the Town and Country Planning (Development Management Procedure) (England) Order 2015; to apply any set or rigid criteria for defining major development; and the definition should not be restricted to development proposals that raise issues of national significance.
 - The decision maker may consider whether the proposed development has the **potential to cause a significant adverse impact on the purposes for which the area has been designated or defined**, rather than whether there will indeed be a significant adverse impact from the proposed development.
 - The decision maker may consider the proposed development in its **local context** as a matter of planning judgement.
 - There **may be other considerations, but which may not be determining factors whether a proposed development is major development.** For example, if the proposed development is Environmental Impact Assessment (EIA) development.
 - The **ordinary sense of the word ‘major’ is important and the decision maker should take a common sense view** as to whether the proposed development could be considered major development.
- A9. In Mr Fisher’s 2017 legal opinion, he was of the view that:
- *“... it would arguably amount to an error of law to fail to consider paragraph [190] at the site allocations stage of plan making for the National Park. The consequence of doing so would be to risk allocating land for major development that was undeliverable because it was incapable of meeting the major development test in the NPPF.”*

Methodology

A10. There are two stages of assessment:

- **Stage 1 – Determining major development**
- **Stage 2 – Consideration of major development**

A11. A Stage 1 Assessment was carried out prior to the Local Plan (Regulation 18) public consultation and undertaken again along with a Stage 2 Assessment to support the next stage of the plan-making process, the Proposed (Regulation 19) Submission Local Plan.

Stage 1 – Determining major development

A12. The Stage 1 Assessment is based on the factors set out in footnote 67 of the NPPF set out in Figure 1.

Figure 1: Stage 1 – Determining major development

Factor (NPPF footnote 64)	Assessment notes	Potential source/s of information
Nature of development	<ul style="list-style-type: none"> • Type of proposed allocation e.g. housing/ employment/ mixed use • Likely form of proposed allocation e.g. dwelling mix/ employment use 	<ul style="list-style-type: none"> • Land Availability Assessment • Local Plan (Regulation 19)
Scale of development	<ul style="list-style-type: none"> • Size of proposed allocation e.g. number of dwellings/ employment space • Whether scale of proposed allocation is in keeping with the scale of the surrounding landscape • Note there is no threshold for when the scale of development is regarded as major. Each proposed allocation is assessed considering a combination of qualitative assessment factors 	<ul style="list-style-type: none"> • Local Plan (Regulation 19)
Setting of development	<ul style="list-style-type: none"> • Spatial relationship of the proposed allocation in the local context of settlement form e.g. settlement extension/ infilling/ landscape/ heritage assets • Spatial context e.g. historic settlement pattern in the wider area 	<ul style="list-style-type: none"> • SDNP GIS • Conservation Area Appraisals • Historical maps • Neighbourhood Development Plans • Landscape Sensitivity Analysis • South Downs Integrated Landscape Character Assessment • Site Visit
Potential for significant adverse impact on the National Park Purposes for which the area has	South Downs National Park Special Qualities: 1. Diverse, inspirational landscapes and breathtaking views 2. A rich variety of wildlife and habitats including rare and internationally important species 3. Tranquil	<ul style="list-style-type: none"> • South Downs Integrated Landscape Character Assessment • Landscape Sensitivity

Factor (NPPF footnote 64)	Assessment notes	Potential source/s of information
been designated, including on its Special Qualities	and unspoilt places 4. An environment shaped by centuries of farming and embracing new enterprise 5. Great opportunities for recreational activities and learning experiences 6. Well conserved historical features and a rich cultural heritage 7. Distinctive towns and villages, and communities with real pride in their area	Analysis <ul style="list-style-type: none"> • SDNP Special Qualities • Site visit
Can the proposed allocation be described as 'major' in the ordinary meaning of the word?	<ul style="list-style-type: none"> • Assessment considers the context of the SDNP noting: <ul style="list-style-type: none"> ○ The more isolated and rural the setting, the more likely development is considered 'major' ○ This is a matter of planning judgement - opinions will vary between individuals e.g. because of experiences and views towards development 	<ul style="list-style-type: none"> • N/A
Cumulative impacts	<ul style="list-style-type: none"> • Assessment considers if the proposed allocation could lead to cumulative impacts when considered alongside other proposed allocations as this may contribute to additional impacts on the National Park 	<ul style="list-style-type: none"> • Draft Local Plan (Regulation 18) • Integrated Impact Assessment Appraisal • Landscape sensitivity analysis • Site Selection Background Paper
Conclusion	<ul style="list-style-type: none"> • Assessment considers all the above factors to determine if the proposed allocation is deemed major development. This could be down to a single or a combination of factors 	<ul style="list-style-type: none"> • N/A

A13. If, at the Stage 1 assessment, a proposed site allocation is deemed major development, then it proceeds to the Stage 2 assessment - consideration of major development.

A14. The Regulation 19 Local Plan proposes 74 sites for residential allocations. Of these, seven sites are considered to hold potential as major development (Figure 2).

Figure 2 – Site considered to hold potential as major development

Proposed Local Plan Allocation	Details
SDA1 - North Street Quarter, Lewes, comprising Phoenix Area, Former Bus Station, and Eastgate Wharf	770 homes / 4,098 sqm commercial / hotel / other supporting uses
SDA2 – Old Malling Farm, Lewes	226 homes
SDA4 – East Sussex County Hall, St Anne's Crescent, Lewes	200 homes and 3,500 sqm office space
SDA5 - East Sussex College, Mountfield Road, Lewes	200 homes
SDA25 - Land south of Herbert Shiner School, Petworth	175 homes (including 100 homes allocated in the Petworth Neighbourhood Development Plan).

Proposed Local Plan Allocation	Details
SDA30 - Shoreham Cement Works	400 homes / 62,000 sqm employment / 4,000 sqm of other supporting uses
SDA31 – Land west of Liphook / Land at Westlands Park, Liphook	380 homes / 65-bed care home / 14 traveller pitches / other supporting uses

A15. A summary of the Stage 1 Assessment is provided in Figure 3 below, followed by the detailed Assessments.

Figure 3 – Stage 1 Assessment Summary

Proposed Local Plan Allocation	Stage 1 Assessment Summary
SDA1 - North Street Quarter, Lewes, comprising Phoenix Area, Former Bus Station, and Eastgate Wharf	Considered as major development due to the scale of the proposed allocation in a prominent location alongside the River Ouse and its potential impact on the landscape and townscape of Lewes and on the purposes of the NP.
SDA2 – Old Malling Farm, Lewes	Considered as major development due to the scale of the proposed allocation in a prominent location alongside the River Ouse and its potential impact on the landscape and townscape of Lewes and on the purposes of the NP.
SDA4 – East Sussex County Hall, St Anne’s Crescent, Lewes	Not considered major development. The proposed allocation would have limited impact on the Special Qualities of the NP as it is contained within the defined settlement boundary on a well located and previously developed and managed site, and development would be of a scale commensurate with existing development and character of the settlement and historical surroundings, in an area of uncharacteristic and moderate landscape sensitivity.
SDA5 - East Sussex College, Mountfield Road, Lewes	Not considered major development. The proposed allocation would have limited impact on the Special Qualities of the NP as it is mostly contained within the defined settlement boundary on a well located and previously developed and managed site, and development would be of a scale commensurate with existing development and character of the settlement and surroundings, in an area of uncharacteristic and low landscape sensitivity.
SDA25 - Land south of Herbert Shiner School, Petworth	Considered as major development due to the scale of the proposed allocation on undeveloped land outside of a defined settlement boundary and its potential impact on the landscape and on the purposes of the NP.
SDA30 - Shoreham Cement Works	Considered as major development due to the scale of the proposed allocation on a very sensitive site outside of a defined settlement boundary and its potential impact on the landscape and on the purposes of the NP.
SDA31 – Land west of Liphook / Land at Westlands Park, Liphook	Considered as major development due to the scale of the proposed allocation on undeveloped land outside of a defined settlement boundary and its potential impact on a characteristic and sensitive landscape and on the purposes of the NP (potentially impacting upon almost all the Special Qualities of the NP).

Major Development Assessment for Proposed Site Allocations

Policy Reference	SDA1	LAA Reference	LE040, LE149 and LE177
Site	North Street Quarter comprising Phoenix Area, Former Bus Station, and Eastgate Wharf	Settlement	Lewes
Proposed development	<p>Area A: 685 homes (C3); 3,500 sqm of business, employment and flexible workspace, medical and health services, leisure uses, retail and restaurants (sub classes may be controlled through condition); a hotel (C1); and retail, community space and other neighbourhood facilities (E(a-f) and F).</p> <p>Area B: 35 homes (C3) and 198 sqm of commercial (E).</p> <p>Area C: 50 homes (C3) and 400 sqm of commercial (E(a) and (b))</p>	Gross site area (ha)	9
Stage 1 - Determining major development			
Nature of development	<p>The site is in a prominent location alongside the River Ouse in the centre of the historic town of Lewes.</p> <p>The proposed allocation is for a total of 770 homes, over 4,000 sqm commercial space and a hotel spread over three brownfield sites.</p>		
Scale of development	The scale of the development is unprecedented in any protected landscape in England. Even though it is on brownfield land within an urban context, it would be considered major development based on its scale alone.		
Setting of development	Lewes is a historic town occupying a chalk spur overlooking a bridge point over the River Ouse where it cuts through the downs on its way to the sea at Newhaven. The centre of Lewes is designated a conservation area, which includes part of the allocation site. Even where outside of the conservation area, the site is an important component of its setting, that of its many listed buildings, and the environment of the River Ouse. There are also key views into and out of the site from the Downs and Chalk hills surrounding the town.		
Potential for significant adverse impact on the National Park Purposes for which the area has been designated	The purposes of the NP are to: 1 - To conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and 2 - To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public. The development has the potential for significant adverse impacts on the first purpose due to its scale and potential landscape and heritage impacts.		
Can the proposed allocation be described as 'major' in the ordinary meaning of the word?	Yes – especially given that it would be one of the largest development allocations in any protected landscape in England.		
Conclusion	MAJOR DEVELOPMENT		

Policy Reference	SDA2	LAA Reference	LE003
Site	Old Malling Farm, Lewes	Settlement	Lewes
Proposed development	226 homes	Gross site area (ha)	15.63
Stage 1 - Determining major development			
Nature of development	This is a greenfield site located alongside the River Ouse. The proposed allocation is for a total of 226 homes.		
Scale of development	The scale of the development is significant in a National Park context.		
Setting of development	Lewes is a historic town occupying a chalk spur overlooking a bridge point over the River Ouse where it cuts through the downs on its way to the sea at Newhaven. The site is located on the northeastern side of the river. It is well screened by topography and trees from the adjacent Malling development, but it will be visible from the opposing ridge running along Offham Road and the Landport development on the other side of the river.		
Potential for significant adverse impact on the National Park Purposes for which the area has been designated	The purposes of the NP are to: 1 - To conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and 2 - To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public. The development has the potential for significant adverse impacts on the first purpose due to its scale and potential landscape impacts.		
Can the proposed allocation be described as 'major' in the ordinary meaning of the word?	Yes. Note this is a matter of planning judgement and opinions will vary between individuals e.g. because of experiences and views towards development.		
Conclusion	MAJOR DEVELOPMENT		

Policy Reference	SDA4	LAA Reference	LE039
Site	East Sussex County Hall, St Anne's Crescent	Settlement	Lewes
Proposed development	200 homes (C3) / c3,500 sqm office space / Appropriate small-scale town centre uses / Community uses	Gross site area (ha)	4.1
Stage 1 - Determining major development			
Nature of development	The site is located close to the centre of Lewes. It comprises of three parcels of land that are a mixture of previously developed land, open space and managed grounds. The site is entirely within the defined settlement boundary. The emerging proposed allocation is to be determined and is predominantly residential for 240 dwellings, around 3,500 sqm of office space with potential for small scale town centre uses and community uses.		
Scale of development	To the north of the overall site is a mix of older medium density housing and historic buildings including designated assets; to the east is older housing set within large plots (with a proposed SDNP LP housing allocation immediately to the east); to the southwest/west a Cemetery designated as a SINC/LWS; and a mix of modern and older medium density housing to the south. It is considered that the development has potential to be at a scale commensurate with the character of the settlement and surroundings.		
Setting of development	The two most northerly land parcels consist of extensive areas of hardstanding in use as car parking and a late 1960s office block. These two areas are largely incongruous to adjacent development and the office block with the wider landscape. The southern land parcel consists of a derelict school (a non-designated heritage asset) set within a large verdant plot. The site contains two Neighbourhood Development Plan allocations for housing. The site is entirely within the Lewes Conservation Area with a number of designated heritage assets to the north and northeast including a Grade I listed church. The land contains a numerous trees including many under tree preservation orders and holds potential archaeological interest.		
Potential for significant adverse impact on the National Park Purposes for which the area has been designated	<p>The purposes of the NP are to: 1 - To conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and 2 - To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.</p> <p>The previously developed nature of the site means the site is uncharacteristic of the LCA G2: Ouse Valley sides character area and it is concluded that the site as currently presented has weak landscape distinctiveness. Whilst the site is assessed as having intermittent views, its visibility is high, largely because of its prominent location on a slope crest which falls sharply to the south. It is concluded that the site has moderate landscape sensitivity. At a local scale, built development could lead to changes to the landscape and minor changes to character given it is deemed as uncharacteristic of its area. In terms of impact on the NP purposes, development could potentially impact on the following Special Qualities of the NP: long distance views (SQ No.1); on the adjacent SINC/LWS (SQ No. 2); and on the adjacent conservation area and historic townscape including designated and non-designated assets (SQ No. 6).</p>		
Can the proposed allocation be described as 'major' in the ordinary meaning of the word?	No - Note this is a matter of planning judgement and opinions will vary between individuals e.g. because of experiences and views towards development.		
Cumulative impacts	There are other proposed site allocations in the settlement, including one adjacent to the west of the site. However, this is small (8 dwellings / 0.4ha) and it is considered that collectively, there is unlikely to be any cumulative impacts at a local scale.		
Conclusion	NOT MAJOR DEVELOPMENT		

Policy Reference	SDA5	LAA Reference	LE141
Site	East Sussex College, Mountfield Road	Settlement	Lewes
Proposed development	200 dwellings	Gross site area (ha)	5.4
Stage 1 - Determining major development			
Nature of development	The site is located on the southeast edge of Lewes. It comprises of three parcels of land of previously developed land within the East Sussex College Campus, north and south of Mountfield Road. Around 1ha of the allocation is outside the defined settlement boundary (the northwest parcel is almost entirely within the defined settlement boundary / around 50% of the northeastern and south parcel are outside the boundary). The proposed allocation is residential for 200 dwellings.		
Scale of development	The overall site is bound by a railway to the north with modern medium density residential development to the northwest and the Railway Land SINC to the north and northeast; open land to the south and east; and a mix of medium density modern development, commercial and sports uses to the west. It is considered that the development is at a scale commensurate with the character of the settlement and surroundings.		
Setting of development	The site comprises of a mixture of modern and older buildings, extended Victorian buildings, areas of hardstanding including car parking and managed grounds that includes protected trees. Lewes Conservation Area is immediately to the west of the south parcel and to the southwest of the northwest land parcel with potential archaeological interest. Development of the site would represent a change in land use within the settlement boundaries of Lewes on previously developed land and within the context of a managed site. It is considered that development would not be incongruous in terms of its spatial relationship with the settlement form and in the context of the historical settlement development pattern.		
Potential for significant adverse impact on the National Park Purposes for which the area has been designated	<p>The purposes of the NP are to: 1 - To conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and 2 - To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.</p> <p>The previously developed nature of the site means the site is uncharacteristic of the LCA G2: Ouse Valley sides character area and it is concluded that the site has very weak landscape distinctiveness. Whilst the site is assessed as having intermittent views, its visibility is moderate, and it is concluded that the site has low landscape sensitivity.</p> <p>The site would lead to development in the NP. At a local scale, built development could lead to changes to the landscape and minor changes to character deemed as uncharacteristic of its area. In terms of impact on the NP purposes, development could potentially impact on the following Special Qualities of the NP : long distance views from higher ground (SQ No.1); on the adjacent SINC (SQ No.2); and on the adjacent conservation area and loss of Victorian building/s (SQ No. 6).</p>		
Can the proposed allocation be described as 'major' in the ordinary meaning of the word?	No - Note this is a matter of planning judgement and opinions will vary between individuals e.g. because of experiences and views towards development.		
Cumulative impacts	One of the key considerations of principles of the spatial strategy set out in the draft Local Plan is to take a positive approach to development that reflects the presumption in favour of sustainable development whilst meeting the NP Purposes as set out above. This includes considering the cumulative impacts of development. Whilst there are other proposed site allocations in the settlement, none are near this site, and it is considered unlikely there will be any cumulative impacts at a local scale.		
Conclusion	NOT MAJOR DEVELOPMENT		

Policy Reference	SDA25	LAA Reference	CH089
Site	Land south of Herbert Shiner School	Settlement	Petworth
Proposed development	175 homes (including 100 homes allocated in the Petworth Neighbourhood Development Plan).	Gross site area (ha)	10.7
Stage 1 - Determining major development			
Nature of development	The site is on the southern edge of Petworth with extensive views towards the scarp slope and footslopes. It will comprise a significant extension to this small town.		
Scale of development	The site covers a significant area with medium density development and schools on its northern side; and countryside with some dispersed development on its southern, eastern and western sides. Whilst the development has the potential to be at a scale commensurate with the character of the settlement and surroundings, and that with careful mitigation could be integrated into the landscape, it would nonetheless represent a large extension to the settlement with the potential to significantly change its southern edge.		
Setting of development	The site comprises arable agricultural land bounded by the A285 to the west, Grove Lane to the east and two schools and surrounding residential area to the north. The western half of the site is a current allocation in the Petworth Neighbourhood Development Plan, so this allocation would represent an extension eastward towards Grove Lane.		
Potential for significant adverse impact on the National Park Purposes for which the area has been designated	<p>The purposes of the NP are to: 1 - To conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and 2 - To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.</p> <p>The site currently has a high landscape sensitivity, but this is likely to change as a result of the existing NDP allocation to the west. The site is on the south facing slopes of the upper Rother Valley, comprising the eastern part of an arable field. The site bounds Grove Lane to the east. Grove Lane is rural in character with mature hedgerows and banks blocking views into the site other than at the field entrance adjacent to Soanes, a Grade II listed building to the south-east. In terms of impact on the NP purposes: SQ No.1 – Diverse, inspirational landscapes and breathtaking views – the site has potential to impact on view from and to Petworth from the south; SQ No.4 – An environment shaped by centuries of farming and embracing new enterprise – the site will result in the loss of productive arable fields; No.6 – Historical features & cultural heritage – potential impact on the adjacent listed building and views of the church; and No.7 – The distinctive town/ community of Petworth.</p>		
Can the proposed allocation be described as 'major' in the ordinary meaning of the word?	Yes – if the site is considered as a whole including the NDP allocation. Note this is a matter of planning judgement and opinions will vary between individuals e.g. because of experiences and views towards development.		
Cumulative impacts	This is a key consideration for this site. Taken on its own, the use of the eastern part of the site for 75 homes would probably not be considered major development, but its cumulative impact with the existing NDP allocation for 100 homes means that the site as a whole is considered to have the potential for significant impacts on the National Park purposes.		
Conclusion	MAJOR DEVELOPMENT		

Policy Reference	SDA30	LAA Reference	HO022
Site	Shoreham Cement Works	Settlement	Upper Beeding
Proposed development	400 homes / 62,000 sqm employment / 4,000 sqm of other supporting uses	Gross site area (ha)	44
Stage 1 - Determining major development			
Nature of development	The site comprises an unrestored chalk quarry with very large and imposing redundant concrete buildings and chimney on the eastern side of the A283 Steyning Road, with more modest buildings and open storage on the western side of the road, adjacent to the River Adur. The proposed development would be a significant mixed residential and commercial redevelopment of the site, effectively creating a new community detached from any existing settlement.		
Scale of development	The scale of the existing development on this site is already very imposing on the landscape, so the scale of the proposed development needs to be seen in this context. Nonetheless, 400 homes and 62,000 sqm of employment space is significant in National Park terms, especially on such a rural site.		
Setting of development	The location is very sensitive in landscape terms, sitting in the narrowest part of the National Park with extensive views from and to the site from Steyning Road, the River Adur, the western bank including Lancing College and the open downland to the east. The chimney is visible for many miles across the Weald to the north.		
Potential for significant adverse impact on the National Park Purposes for which the area has been designated	<p>The purposes of the NP are to: 1 - To conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and 2 - To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.</p> <p>The proposed development has the potential to impact on the following special qualities: SQ No.1 – Diverse, inspirational landscapes and breathtaking views – as described above the site is very prominent in these views and the existing buildings together with the exposed chalk faces are both visual detractors and locally valued; SQ No.2 - Rich variety of wildlife and habitats – the ecology of the site is very sensitive with peregrine falcons, potentially bats and rare botanical species; SQ No.6 – Historical features & cultural heritage the site has historic and cultural value as part of the National Park's industrial heritage.</p>		
Can the proposed allocation be described as 'major' in the ordinary meaning of the word?	Yes - Note this is a matter of planning judgement and opinions will vary between individuals e.g. because of experiences and views towards development.		
Cumulative impacts	Since there are no other proposed site allocations near this site, it is considered unlikely there will be any cumulative impacts at a local scale.		
Conclusion	MAJOR DEVELOPMENT		

Policy Reference	SDA31	LAA Reference	EA215
Site	Land west of Liphook / Land at Westlands Park	Settlement	Liphook
Proposed development	380 homes / 65-bed care home / 14 traveller pitches / other supporting uses	Gross site area (ha)	52.5
Stage 1 - Determining major development			
Nature of development	<p>The site is in a prominent location to the west of Liphook, outside, but adjacent to the defined settlement boundary.</p> <p>The proposed allocation is for 380 dwellings (including custom and self-build), retirement living and care home provision (65-unit care); 14 traveller pitches; and other uses to be determined.</p>		
Scale of development	<p>The site covers an expansive area with modern medium density development on its northern side; modern medium density development transitioning into older lower density development on its eastern side; and dispersed, mostly older sporadic development and countryside on its southern and western sides. It is considered that whilst the development has the potential to be at a scale commensurate with the character of the settlement and surroundings, and that with careful mitigation could be integrated into the landscape (it includes a substantial area outside of built development for the provision of mitigation measures), it would represent a very large and obvious (strategic scale) extension to the settlement with the potential to significantly alter the western edge of the settlement.</p>		
Setting of development	<p>The site comprises arable agricultural land bound by B2070 Portsmouth Road to the east. The site includes protected trees and priority habitats with adjacent Sites of Importance for Nature Conservation and ancient woodland with a green infrastructure function including connections to the wider habitat mosaic. Development would introduce a large built form into undeveloped countryside and create a large-scale extension to the nucleated settlement of Liphook.</p> <p>Development of the site would form an extension to Liphook and represent a significant encroachment into the countryside. It is considered that development would not be incongruous in terms of its spatial relationship with the settlement form and in the context of the historical settlement development pattern. Although great care will need to be taken in this regard due to the scale of the proposed extension.</p>		
Potential for significant adverse impact on the National Park Purposes for which the area has been designated	<p>The purposes of the NP are to: 1 - To conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and 2 - To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.</p> <p>The site demonstrates characteristics of LCA M3: Woolmer Forest/ Weaver's Down Farmland and Heath Mosaic with strong landscape distinctiveness. The site is assessed as open in nature with high visibility, and it is concluded that the site has a high landscape sensitivity, mostly due to its scale, National Park boundary location, and visibility from local viewpoints and the wider countryside. This is reflected in the made Bramshott and Liphook Neighbourhood Development Plan which identifies part of the site as a 'locally significant view'.</p> <p>The site would lead to development in the NP. Built development could lead to changes to the landscape and its character. In terms of impact on the NP purposes, the scale of the site suggests that development may impact on almost all the Special Qualities of the NP: SQ No.1 – Diverse, inspirational landscapes and breathtaking views; SQ No.2 - Rich variety of wildlife and habitats (SPA, ecology designations, & priority habitats); SQ No.4 – An environment shaped by centuries of farming and embracing new enterprise; No.6 – Historical features & cultural heritage (Little Boarhunt and archaeology); and No.7 – The distinctive town/ community of Liphook which is outside the National Park.</p>		

Can the proposed allocation be described as 'major' in the ordinary meaning of the word?	Yes - Note this is a matter of planning judgement and opinions will vary between individuals e.g. because of experiences and views towards development.
Cumulative impacts	One of the key considerations of principles of the spatial strategy set out in the draft Local Plan is to take a positive approach to development that reflects the presumption in favour of sustainable development whilst meeting the NP Purposes as set out above. This includes considering the cumulative impacts of development. Proposed allocation SDA32 for 8 homes at Westlands House, Longmoor Road, Liphook is adjacent to this site. However, given its modest scale, it is unlikely that there will be any cumulative impacts.
Conclusion	MAJOR DEVELOPMENT

Stage 2 – Consideration of major development

- A16. If, at the Stage 1 assessment, a proposed site allocation is deemed to be major development, then it proceeds to Stage 2 assessment - consideration of major development.
- A17. Stage 2 Assessment (Figure 4) is based on Paragraph 190 of the NPPF which says “When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:
- a) The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
 - b) The cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
 - c) Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated”.
- A18. Whilst this policy is primarily to be applied at planning application stage, it is also relevant at plan making stage because it:
- Facilitates the consideration of different options in setting a spatial development strategy to meet the housing needs of the Park and to lessen any potential harm; and
 - Reduces the risk that an allocated site is undeliverable at the planning application stage because it cannot meet the major development test as set out in the NPPF.
- A19. The table below sets out the conclusions for each of the four sites considered to be major development as assessed against each of the criteria in NPPF 190. For criteria a and b these are the same for each site because the context is set by the overarching need for development, the site selection process and the potential for meeting that need in other ways. Assessment against criterion c) is individual to each site.
- A20. In summary, it is considered that there are exceptional circumstances that justify the allocation of these sites and that they are in the public interest. The assessments will need to be revisited at planning application stage when further details are known.

NPPF Para 190 Criteria	SDA1 North Street Quarter, Lewes, comprising Phoenix Area, Former Bus Station, and Eastgate Wharf	SDA2 Old Mall Farm, Lewes	SDA25 Land south of Herbert Shiner School, Petworth	SDA30 Shoreham Cement Works	SDA31 Land west of Liphook / Land at Westlands Park, Liphook
a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;	The need for additional homes within the National Park is set out in the Housing and Economic Development Needs Assessment (HEDNA) Addendum as 323 dwellings per annum (or 6,137 homes between 2024 and 2042). It would not be possible to meet this need without the 2,185 homes provided on these major development sites. The employment provision on SDA1 and SDA30 is also an important contributor to meeting the needs in the HEDNA. Failure to meet these needs would be detrimental to the economic and social wellbeing of communities within the National Park.				
b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and	The whole local planning authority area is within the designated area of the National Park, so developing outside would require the cooperation of neighbouring local planning authorities, which have their own challenges in meeting high levels of housing needs. The Land Availability Assessment has stringently tested all potential sites within the National Park and has not identified sufficient smaller scale sites to meet the needs set out in the HEDNA without utilising major development sites.				
c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.	Recent planning history has demonstrated that it is possible to achieve acceptable development on this site without detrimental effects that cannot be moderated.	Recent planning history has demonstrated that it is possible to achieve acceptable development on this site without detrimental effects that cannot be moderated.	Preliminary design work indicates that the environmental effects of development on this site can be moderated and benefits achieved.	Preliminary design work indicates that the environmental effects of development on this site can be moderated and benefits achieved.	Preliminary design work indicates that the environmental effects of development on this site can be moderated and benefits achieved.
Summary	It is considered that there are exceptional circumstances that justify the allocation of these sites and that they are in the public interest.				

Appendix B – Windfall Allowance Spreadsheet of Historic Delivery

Windfall from Small Sites Less Than 5 by District, Year by Year (Net)														
District	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	Total	Average	Average (rounded)	
Adur	-1	1	0	0	0	2	0	1	1	0	4	0.4	0	
Arun	8	4	3	2	6	6	-1	0	9	0	37	3.7	4	
Brighton & Hove	0	0	0	0	0	0	0	0	0	0	0	0	0	
Chichester	9	24	11	17	31	20	8	14	19	3	156	15.6	16	
Eastbourne	0	0	0	0	0	0	0	0	0	0	0	0	0	
East Hampshire	26	35	22	21	34	44	34	13	21	11	261	26.1	26	
Horsham	2	-1	4	2	6	-1	-1	0	9	1	21	2.1	2	
Lewes	9	10	20	5	18	19	15	18	9	12	135	13.5	14	
Mid Sussex	5	-2	1	0	3	4	0	0	4	4	19	1.9	2	
Wealden	3	0	-2	0	3	0	3	1	1	1	10	1	1	
Winchester	8	6	9	13	4	21	12	6	8	7	94	9.4	9	
Worthing	0	0	1	0	0	0	0	0	0	0	1	0.1	0	
Total	69	77	69	60	105	115	70	53	81	39	738	73.8	74	

Appendix C – Housing Trajectory

