

South Downs Local Plan: Preferred Options

**Assessment of Site Allocations against Major
Development Considerations**

Technical Report

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Chapter 1: Introduction

Background

1.1 Paragraph 116 of the National Planning Policy Framework (NPPF) states that:

“116. Planning permission should be refused for major developments in these designated areas [National Parks, the Broads, and AONBs] except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

- *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 cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and*
- *Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated”*

1.2 Legal opinion has been obtained on the definition of ‘major development’ in this context (see below) and on whether allocation of a major site in a Local Plan can only be made if the requirements of para. 116 are met. The conclusion of James Maurici QC on the latter point is ‘that the matters in the bullet points in para. 116 would have to be addressed in the plan-making process.’

1.3 The South Downs Local Plan: Preferred Options proposes to allocate 17 sites for residential development, together with a further three strategic sites for mixed use development, two of which include housing. In addition sites will be allocated in Neighbourhood Development Plans, which must be in general conformity with the strategic policies of the Local Plan.

1.4 This report addresses the 17 sites allocated in the South Downs Local Plan: Preferred Options document (but not the strategic sites) in order to consider:

- a. Which allocations are considered to be major development; and
- b. Whether the development proposed on these sites would constitute exceptional circumstances in the public interest taking account of the assessments required by paragraph 116.

1.5 The strategic sites allocated in the Local Plan are clearly major development and subject to paragraph 116. They were not considered as part of this process, having already been considered in Chapter 8 of the Local Plan: Preferred Options document (paragraphs 8.8 to 8.25), the Lewes Joint Core Strategy and Fernhurst Neighbourhood Development Plan process

1.6 In regard to North Street Quarter and adjoining land in Lewes, the decision to allocate the site, including its consideration by the Inspector at the Examination in Public, has already involved an assessment of the need for it, of potential sites elsewhere and of its environmental effects. The Syngenta site at Fernhurst was also assessed against major development considerations as part of the neighborhood plan preparation. It was not therefore considered necessary to repeat these processes, although a further assessment may be required when further information is available about the nature and quantity of development proposed at Syngenta.

- 1.7 With respect to the proposed development at Shoreham Cement Works, the consideration in paragraphs 8.8 to 8.25 covers many of the considerations in general terms, while the discussion of constraints, opportunities and development and the criteria in Policy SD32 address environmental impacts. However, the nature and quantity of the proposed development is insufficiently defined to enable a more detailed assessment of exceptional circumstances to be made at this stage. Further work may be undertaken if and when more specific proposals are developed.

The Definition of Major Development

- 1.8 The NPPF does not define major development. The SDNPA sought a legal opinion on this matter, initially in 2011 in relation to paragraph 22 of PPS7 which preceded the NPPF. This opinion, from James Maurici QC, was reviewed and updated in 2013 to take account of the NPPF and the Planning Practice Guidance (PPG), as well as relevant case law which had emerged in the meantime.
- 1.9 The case law and PPG confirm that whether a proposed development should be treated as a major development will be a matter for the relevant decision taker, taking into account the proposal in question and the local context.
- 1.10 In relation to a case in the SDNP in which the Inspector found a proposal for 30 dwellings not to be major development because the impact would be confined to the local area, Maurici considered that this cannot possibly be a test of general application. He found that:
- ‘The Inspector in the Burlands Field decision appears to have reached his conclusions on whether the development was “major development” only after a careful assessment of impacts. In my opinion, that is to put the cart before the horse. While it may well be appropriate, as part of the determination of whether a proposal is “major development”, to consider whether, by reason of its scale, character or nature, it has the potential to have a serious adverse impact on a National Park or AONB, “major developments” are not defined in paragraph 116 of the NPPF by their actual, assessed impacts but by the nature of the development.’
- 1.11 Maurici sets out principles – derived from the caselaw, guidance and appeal decisions - to be applied by decision makers when determining whether a proposal is for major development. These are summarised as follows:
1. The determination is a matter of planning judgment to be decided by the decision maker in light of all the circumstances and the context of the site.
 2. The phrase “major development” is to be given its ordinary meaning. Accordingly, it would be wrong in law to:
 - a. Apply the definition of major development contained in the Town and Country Planning (Development Management Procedure) (England) Order 2010.
 - b. Apply any set or rigid criteria.
 - c. Restrict the definition to proposals that raise issues of national significance.
- 1.12 The decision maker may consider whether the development has the potential to have a serious adverse impact on the natural beauty and recreational opportunities provided by a National Park or AONB by reason of its scale, character or nature. However, that does not require (and ought not to include) an in-depth consideration of whether the development will in fact have such an impact. Instead, a prima facie assessment of the potential for such impact, in light of the scale, character or nature of the proposed development is sufficient.

- 1.13 As a matter of planning judgement, the decision maker must consider the application in its local context. The same development may amount to “major development” in one National Park, but not in another; or in one part of a National Park, but not in another part of the same National Park.
- 1.14 The application of criteria such as whether the development is EIA development, whether it meets the 2010 Order definition, or whether it requires an appraisal of the likely traffic, health, or retail implications of the proposal will all be relevant considerations, but will not determine the matter and may not even raise a presumption either way.
- 1.15 Having considered all the circumstances, including the local context, the decision maker must take a common sense view on whether the proposed development can appropriately be described – in ordinary language - as “major development”. This will normally be much larger than 6 housing units.
- 1.16 These principles confirm the conclusions reached by Maurici in his earlier 2011 opinion. The only difference is that the 2011 opinion stated that criteria may be used to raise a presumption that a development is ‘major development’. Such criteria might include that the development is EIA development, that it is within Schedule 2 of EIA Regulations 1999, that it is within the 2010 Order definition (referred to as a ‘useful starting point’), and that it requires an appraisal/ assessment of traffic, health, and retail implications. As set out above, Maurici no longer considers these to be determining factors, and they may not even raise a presumption either way.
- 1.17 In a further opinion dated October 2011, Maurici clarifies that any consideration of what is ‘major development’ should encompass wildlife and cultural heritage as a limb of the statutory purposes of a National Park. He also considered that “scenic beauty” (as used by the NPPF and PPG) is concerned with what can be seen, and “natural beauty” as now defined by statute is clearly wider, encompassing wildlife and cultural heritage. In relation to principle 3 above, therefore, potential impacts on ecology, geodiversity, archaeology and cultural heritage should be taken into account in addition to ‘scenic beauty and landscape’.
- 1.18 This report applies all the above principles to the 17 site allocations, but in particular considers the potential for serious adverse impact as described in principle 3, taking account of the local context as set out in principle 4.

Chapter 2: Methodology

Stage 1: Identification of Major Sites

- 2.1 For each of the sites proposed for allocation, a desk top assessment was made based on the information provided in the Local Plan: Preferred Options document, in the Strategic Housing Land Availability Assessment (SHLAAA), and in the Sustainability Appraisal of the Local Plan: Preferred Options document. Reference was also made to the satellite and street views on Google Maps. The following information was set out in tabular form:
- Site size in hectares
 - Capacity in terms of numbers of dwellings
 - Site description
 - Landscape assessment
 - Constraints in as far as they are relevant to environmental or recreational impacts, including nature conservation and cultural heritage designations; and requirements for ecological, archaeological, heritage, landscape and visual impact, or transport assessments.
 - Summary of Habitat Regulations Assessment (where relevant)
 - Summary of the Sustainability Appraisal
- 2.2 Based on this information, a conclusion was reached as to whether or not the development proposed for the site has the potential to have a serious adverse impact on the natural beauty and recreational opportunities provided by the National Park. The reasons for this conclusion were set out.

Stage 2: Assessment of Major Sites

- 2.3 Each site that is considered to be major development at Stage 1 was then assessed against the following considerations derived from paragraph 116 of the NPPF:
- The need for development in the location proposed, taking account of any local need identified by the relevant housing authority and bearing in mind that housing in the National Park should focus on the needs of its local communities;
 - The possible impact on the local economy, in particular any that which is specific to the site or location (as opposed to general benefits such as on the construction industry);
 - The scope for meeting the need in some other way, on the assumption that it is a local need which should ideally not be met outside the designated area;
 - Detrimental effects on the environment (including wildlife and cultural heritage) and the extent to which the effects can be moderated;
 - Detrimental effects on the landscape and the extent to which the effects can be moderated;
 - Detrimental effects on recreational opportunities and the extent to which the effects can be moderated.
- 2.4 A conclusion was then drawn as to whether, at this stage, there is a reasonable expectation that the exceptional circumstances exist and that it could be demonstrated that development would be in the public interest.

Chapter 3: Identification of Major Sites

- 3.1 The results of the Stage 1 assessment are set out in the table in Appendix A. Of the 17 sites the following are considered definitely not major development as a result of their modest size/ capacity and (in the case of the sites at Clements Close, Binsted, Itchen Abbas House, and Long Priors, West Meon) their Low/ Medium Landscape Sensitivity:
- Land at New Road, Midhurst – 8 dwellings, 0.1 has.
 - Land at Clements Close, Binsted -12 dwellings, 0.5 has.
 - Land at Kiln Lane, Buriton – 7 dwellings, 0.2 has.
 - Land at Itchen Abbas House – 8 dwellings, 0.7 has.
 - Land south of Loppers Ash, South Harting - 8 dwellings, 0.4 has.
 - Land at Meadow House, West Meon – 6 dwellings, 0.2 has.
 - Land at Long Priors, West Meon – 10 dwellings, 0.3 has.
- 3.2 On the other hand, the land at Old Malling Farm, Lewes (proposed for 200 dwellings on a net area of 6.6 has.) is clearly major development by virtue of its scale, its landscape impact, its character as a green finger, its proximity to a Conservation Area and Listed buildings, its archaeological potential, its proximity to ecological designations, and its impact on views from the Ouse Valley Way. As a result it clearly has potential for serious adverse impact on natural beauty and recreational opportunities.
- 3.3 The following remaining sites are more marginal:
- Land at Petersfield Road, Midhurst – 40 dwellings, 2.4 has.
 - Land at Lamberts Lane, Midhurst – 15 dwellings, 0.4 has.
 - Land at Brookland Way, Coldwaltham – 20 dwellings, 1.0 has.
 - Land east of Cowdray Road, Easebourne –14 dwellings, 0.7 has.
 - Land at Petersfield Road, Greatham –30 dwellings, 2.4 has.
 - Land between Church Lane and the A273, Pyecombe – 8 dwellings, 1 ha.
 - Land at Farnham Road, Sheet – 15 dwellings, 0.9 has.
 - Land at Hoe Court, Lancing- 15 dwellings, 1 ha.
 - Land at Normansal Park Avenue, Seaford – 20 dwellings, 1 ha.
- 3.4 The table at Appendix A gives relevant information on a site by site basis. The following paragraphs compare the sites from the point of view of key characteristics which will influence whether or not they should be considered major development.

Scale

- 3.5 In relation to the 'starting point' of the 2010 Order referred to in the 2011 Maurici opinion, all but the Pyecombe site are proposed for 10 or more dwellings and all apart from Lamberts Lane are at least 0.5 hectares. However, the 2013 opinion downplays the significance of this to a 'relevant consideration' that will not determine the matter and may not even raise a presumption either way.

- 3.6 The two largest sites, at Petersfield Road, Midhurst and in Greatham, are the same size (2.4 has) with capacities of 40 and 30 dwellings respectively. The size of the Greatham site is however more important in the context of Greatham village which only has about 400 dwellings and 800 population, while the net area of the Midhurst site may be lower once the retention and protection of existing trees is taken into account. The Pyecombe site is also large in area (1 hectare) compared to the size of the village (about 200 population), but is only proposed for 8 dwellings.
- 3.7 In relation to the size of the village (850 population in the parish which also includes Watersfield), the 1 hectare, 20 dwelling site at Coldwaltham is large, whereas the similar sized sites at Lancing and Seaford are less significant because they relate to much larger urban areas outside the National Park. Moreover the site at Seaford is likely to be smaller than one hectare once the retention of the existing wooded area is taken into account.
- 3.8 The sites at Easebourne and Sheet are similar in size, both being smaller than the other marginal sites (apart from Lamberts Lane), but above the 2010 Order threshold. They should, however, be considered within the context of the relatively large settlements of Midhurst and Petersfield, since Easebourne and Sheet, while administratively separate parishes, are physically and functionally linked to their neighbouring towns.
- 3.9 In terms of scale, therefore, taking account both proposed capacity and the local context of the settlements to which they relate, only the Coldwaltham and Greatham sites are clearly major.

Local Context / Enclosure

- 3.10 Both the sites in Midhurst and those in Easebourne and Sheet are enclosed within built development, albeit that one side of the Sheet site is formed by the railway line. The site at Pyecombe is also contained within urban development, with main roads and a petrol station forming two of its boundaries and housing on the other sides.
- 3.11 When seen in the context of recent development to the east and slightly older development to the south, together with the strong tree belt to the west, beyond which is further built development, the Seaford site is semi-enclosed.
- 3.12 The site at Greatham, although not strictly speaking previously developed land (apart from the bungalow), is on the site of a former nursery and is surrounded on three sides by development, including community facilities, but the Local Plan: Preferred Options proposes to omit the existing development to the west and south-west from the Settlement Boundary. If this proposal remains in the next stages of plan preparation, development of the nursery site could appear anomalous in the context of Greatham, representing a significant extension into the open countryside as defined by the Local Plan.
- 3.13 The sites at Lancing and Coldwaltham are seen as incursions into the open countryside.
- 3.14 If considered on the sole basis of the location of the sites in relation to nearby development, and the extent to which they extend into the open countryside, either existing or (in the case of Greatham) proposed, then the allocations at Lancing, Coldwaltham and Greatham are major development.

Landscape Sensitivity

- 3.15 Most of the marginal sites have Medium Landscape Sensitivity, with one (Petersfield Road, Midhurst) only having Low/ Medium Landscape Sensitivity, despite its size, the number of mature trees which might be affected by development, and the requirement for a further Landscape Appraisal (LA)¹. Of the five sites with Medium Landscape Sensitivity, those at Greatham, Easebourne, Pyecombe and Lamberts Lane, Midhurst, nevertheless require an LA; but that at Sheet does not.
- 3.16 Three sites have Medium/ High Landscape Sensitivity and require an LA. These are the site at Coldwaltham and the sites on the edge of the urban areas to the south of the National Park, at Lancing and Seaford. The Lancing and Seaford sites have been reduced in area so that the more open parts of the sites are no longer included, but this has not yet been reflected in the landscape assessment. In the case of the Lancing site, most of the factors which led to its higher sensitivity no longer apply to the reduced site.
- 3.17 The Seaford site, however, is still sensitive due to the loss of local open space (including recently constructed play equipment within a wooded area and a multi-use games area (MUGA)), the views out of the site to the sea, woodland and the downs, and the links to nearby public rights of way. Some of these issues may be more to do with recreational potential than landscape per se but are nevertheless important. It may be possible to mitigate these impacts by retention of some open space as part of a planning brief for the site and by the re-provision of open space within the area to the north that was excluded from the original site.
- 3.18 The Coldwaltham site was originally High Sensitivity but was significantly reduced in area by excluding a large extension of the village to the south-west, thus reducing its sensitivity to Medium / High. This reflects the proximity to an SSSI/ SPA/ Ramsar site and to Open Access Land.
- 3.19 Looking just at the factors of Landscape Sensitivity and requirements for an LA, the two proposed allocations with a case for being considered major development are those at Seaford and Coldwaltham.

Need for Further Assessments

- 3.20 Landscape assessment of most sites would be required as part of any application process and in some cases this may be a Landscape and Visual Impact Assessment as part of an EIA following the screening of proposals.
- 3.21 In addition, both marginal sites in Midhurst, the site at Coldwaltham, the site at Easebourne, and the site at Lancing require ecological surveys. The Greatham and

¹ The Local Plan: Preferred Options actually refers to Landscape and Visual Impact Assessments (LVIAs). The Guidelines for Landscape and Visual Impact Assessment (3rd Ed) describes two types of landscape assessment - the LVIA as part of Environmental Impact Assessment (EIA) and the less formal Landscape Appraisal for projects which fall below the EIA threshold. The latter more flexible type of assessment will usually be more appropriate for the allocation sites (apart from Old Malling Farm).

Coldwaltham sites will require an assessment of their impact on the nearby SPAs/ SACs and this may be a formal Habitat Regulations Assessment.

- 3.22 All marginal sites apart from those at Pyecombe, Sheet, and Seaford do or may require transport statements. The sites at Lamberts Lane, Midhurst, Easebourne, and Greatham require heritage statements and the Greatham site also requires an archaeological assessment. The requirements for further assessments can be an indication of the potential for serious harm and therefore of a major site.
- 3.23 Subject to the retention of protected/ existing mature trees and hedgerows, the site at Farnham Road, Sheet does not require further surveys or assessments, implying that there is no potential for serious harm. The sites at Pyecombe and Seaford also do not require further assessments other than the LVIAs (and subject to retention of protected /existing mature trees and hedgerows).
- 3.24 Such requirements are downplayed in the 2013 opinion as only 'relevant considerations', so the absence of such requirements cannot determine the matter of whether or not these sites are major. However, on the basis of the greatest need for further assessments, those most likely to be major sites are at Easebourne, Greatham, and Lamberts Lane, Midhurst.

Recreational Opportunities

- 3.25 The identification of major sites must also consider the potential for serious harm to recreational opportunities in the National Park (pursuant to the second national park purpose). Such issues are raised in relation to most of the sites, usually as a result of impact on views from public rights of way and in one case from Open Access Land. The exceptions are the two sites in Midhurst and the site at Easebourne.
- 3.26 The Lamberts Lane, Midhurst site does raise the issue of loss of community facilities but this is not considered to be an issue in relation to purpose two recreational opportunities (and in any case many facilities have been replaced in the new school). Similarly the issue of loss of open space, including the play area and MUGA referred to above, is important for the community in Seaford outside the National Park but is not strictly related to the recreational opportunities at which the second national park purpose is aimed.

Conclusion

- 3.27 Seven of the allocations are clearly not major development and development of the site at Old Malling Farm undoubtedly would be major development.
- 3.28 On balance, given that the Maurici opinion advises that the key consideration is whether the development has the potential to have a serious adverse impact on the natural beauty and recreational opportunities (my emphasis), I have come to the following conclusions about the remaining nine 'marginal sites'.
- 3.29 The two sites in Midhurst and the site in Easebourne do not constitute major development proposals as a result of their scale in the local context of a market town, their Medium or Medium/ Low landscape Sensitivity, their relative enclosure within existing development and (in relation to the Petersfield Road site) the lack of environmental constraints. The allocation in Sheet is also not major development for similar reasons. The site at Pyecombe is not major, despite its relatively large area in

relation to the village, because of its low proposed capacity, its Medium Landscape Sensitivity, its containment by urban uses and its limited requirement for further assessments.

- 3.30 The marginal site at Lancing is not major development, having been reduced in size to exclude the more open and sensitive areas, including the area crossed by and near to the public rights of way and adjoining the Local Nature Reserve. The site in Seaford is, on balance, considered not to be major development given its scale in relation to the town of Seaford, its semi-enclosed nature, and the requirement to either retain and /or relocate public open space and play/ games areas.
- 3.31 The allocations at Brookland Way, Coldwaltham and Petersfield Road, Greatham are considered to be major development because of their scale in relation to the size of the villages, Medium / High Landscape Sensitivity (Coldwaltham only), their unenclosed nature (in the case of Greatham in relation to proposed changes to the settlement boundary), need for further assessments (Greatham), and their proximity to Special Protection areas (SPAs), Special Areas of Conservation (SACs), Sites of Special Scientific Interest (SSSIs), and (in the case of Coldwaltham) a Ramsar site.
- 3.32 As a result only the following marginal sites qualify as major sites for the purposes of paragraph 116 of the NPPF and are taken forward for Stage 2 assessment:
- Land at Old Malling Farm, Lewes
 - Land at Brookland Way, Coldwaltham.
 - Land at Petersfield Road, Greatham

Chapter 4: Assessment of Major Sites

- 4.1 This chapter sets out the conclusions reached with regard to whether development proposed for the three major sites is likely to be justified as exceptional circumstances in the public interest. Before doing so, it considers what might be considered to be an exceptional need in the context of the South Downs National Park.

Definition of Need

- 4.2 The first consideration required by paragraph 116 is that of need for the development. It should be borne in mind that national park authorities are not obliged to meet objectively assessed needs in full where to do so would give rise to conflict with national planning policies and with their statutory purposes. The 2010 DEFRA Circular ('English National Parks and the Broads UK Government Vision') recognises that National Parks are not suitable locations for unrestricted housing and that they should focus on delivering affordable housing responding to local needs.
- 4.3 As a result the SHMA2 states that the policy focus in the South Downs Local Plan is on meeting local needs with a specific focus on providing affordable housing; and working with local authorities to plan to meet housing needs across the wider housing market areas (HMAs). The SDNPA should plan to meet a proportion of these housing needs within the National Park itself, in particular to meet the local affordable housing need; but this proportion would be defined taking account of the statutory Purposes and Duty and 2010 Circular based on:
- Meeting local housing needs, particularly for affordable housing;
 - Supporting local employment opportunities and key services;
 - Landscape impact and development constraints.
- 4.4 The expectation is therefore not that the SDNP will meet "full objectively assessed need" but that it will seek to meet "local needs" focused on supporting communities within the SDNP, rather than catering particularly for wider market demand, as far as is compatible with the designation of the landscape.
- 4.5 As a result, it is not considered that a shortfall in meeting a pro-rata part of the full objectively assessed needs in the HMAs of which the SDNP forms part is in itself an exceptional circumstance in the public interest, justifying major development in accordance with paragraph 116 of the NPPF. Instead consideration is given to local and affordable needs of the specific community in which the site is located, including those of other nearby communities. However evidence at such a small scale is only be available for the existing situation and may not reflect how such needs will emerge over the longer 15 year plan period, so some assumptions need to be made about this. In two cases the adopted Joint Core Strategies set requirements at a level below that of the plan area or of the South Downs part of it. Such requirements are also taken to be need in the context of a definition of exceptional circumstances.

² Strategic Housing Market Assessment, SDNPA, Final Report, September 2015 by GL Hearn Ltd

Conclusions for Each Site

- 4.6 The results of the Stage 2 assessment are set out in the table in Appendix B. The Sustainability Appraisal for these sites is set out in Appendix C. The conclusions are as follows.

Land at Old Malling Farm, Lewes

- 4.7 The SDNPA originally considered that this site should not be developed and would not meet the major development test. It did not therefore include it as a strategic site in the Lewes Joint Core Strategy (JCS). However, the Inspector at the Examination had a different view and requested that a Modification be made to the plan in respect of this site if he was to find the JCS sound.
- 4.8 In the light of the need for housing, especially affordable housing, within Lewes and the importance which the Inspector attached to meeting this need as far as possible, it is considered that an exceptional circumstance can be demonstrated in terms of need. Moreover, the JCS has demonstrated that this need cannot be fully met outside the designated area of the National Park, although sites at Ringmer and Cooksbridge do make a contribution.
- 4.9 Consideration must then be given to the severity of the adverse environmental, landscape and recreational impacts and the extent to which they can be moderated. The 2012 Landscape Assessment sets out various ways in which the adverse landscape impacts can be mitigated and these are included in the criteria set out in the draft policy for consideration as a modification by the JCS Inspector. The criteria also address the other potential adverse impacts. Subject to these criteria and the Inspector maintaining his view, following further examination, that the site should be allocated for development, it must be reluctantly accepted that the tests for exceptional circumstances in the public interest are met.

Land at Brookland Way, Coldwaltham

- 4.10 Although there are 40 households in Horsham who have chosen Coldwaltham as an area of choice, few of these will have a local connection to the parish and so would not constitute a local need. Existing local needs for social rented housing in Coldwaltham are likely to be met by the recently approved site at Silverdale, which is about to commence construction.
- 4.11 The SHMA identifies a longer term demographic need for 13 dwellings per annum in the Horsham part of the National Park. It may be appropriate to meet a proportion of this need in settlements in the SDNP to support local employment and services and subject to landscape and other constraints; but there are limited opportunities to do so in other villages.
- 4.12 In terms of meeting some of this longer term need within Coldwaltham, other potential sites identified by the SHLAA are not considered suitable, apart from the Silverdale site and a site for 6 dwellings in nearby Watersfield. While it may be possible to find sites outside the designated area in Pulborough, this would not be a true substitute for a site in the village because of poor public transport links.

- 4.13 The landscape sensitivity derives from the ecological and recreational attributes rather than from visual impact per se. Development of the site has potential serious impacts on the nearby SSSI/ SPA/ Ramsar site as well as on other more distant SACs. These potential adverse effects on the environment and recreational opportunities are mitigated by existing mature trees screening the site from the south east and are capable of further moderation by virtue of the buffer strip proposed. Further mitigation may be possible on land in the same ownership.
- 4.14 In order to demonstrate exceptional circumstances, it will be necessary to carry out a local housing needs survey in the parish to supplement the longer term demographic in the SHMA and to take account of the completion of the 8 units at Silverdale. It is likely that this need will not be evident until later in the plan period and that release of this site will need to be phased for the second or third 5 years of the plan period. An additional criterion to this effect will therefore need to be included in the site allocation policy at the next stage of plan preparation. Subject to this and to the mitigation measures referred to above, it is considered that the tests for exceptional circumstances in the public interest could be met.

Land at Petersfield Road, Greatham, Hampshire

- 4.15 The site is larger than needed to meet local housing needs in Greatham but could also make a contribution to meeting the local and affordable needs of adjoining parishes, where opportunities are limited for landscape and other reasons. It could also make a small contribution towards the market housing needs of the wider HMA, although most of these could be met in nearby Whitehill and Bordon. However the site is required to help meet the requirements inherited from the EH JCS for 100 dwellings to be allocated in the villages of East Hants within the National Park, which are over and above the Whitehill and Borden provision. Not all of these can be found in villages with settlement boundaries elsewhere.
- 4.16 This site is in a sustainable location between existing housing and the primary school and near to the village hall. The size and tenure of housing should be such as to meet local and affordable needs and not those of commuters using the nearby A3. Subject to this and to the provision of SANGs, it is considered that the tests for exceptional circumstances in the public interest are met.
- 4.17 In terms of detrimental impacts on the environment, landscape and recreational opportunities, the site itself is relatively free of major environmental constraints, its landscape impact would be limited and its effect on the adjoining right of way would be minimal. However its proximity to important European wildlife sites threatens to have a detrimental impact. Subject to mitigation measures (such as SANGs) to deal with this, and to a criterion being introduced to the policy to ensure that the tenure and size of housing meets local needs, it is considered that the tests for exceptional circumstances in the public interest are met.

Chapter 5: Conclusions

- 5.1 Following a robust and consistent examination of the evidence available at this stage in relation to the 17 allocated sites, it was concluded that seven of the allocations are clearly not major development and that development of the site at Old Malling Farm undoubtedly would be major development.
- 5.2 Of the remaining nine 'marginal sites', seven were considered on balance, and after careful consideration of various relevant factors, not to be major development. The remaining allocations at Brookland Way, Coldwaltham and Petersfield Road, Greatham are considered to be major development because of their scale in relation to the size of the villages, Medium / High Landscape Sensitivity, their unenclosed nature, need for further assessments and their proximity to SSSIs, SACs SPAs, and a Ramsar site.
- 5.3 These two sites, together with Old Malling Farm, have been assessed against the considerations set out in paragraph 116 of the NPPF.
- 5.4 With regard to the need for development on these sites, it is considered that this must relate to the needs of the local community for affordable housing and housing required to support the local economy and key services, rather than more general demographic need which can be provided in adjoining parts of the relevant HMA outside the designated area. Such a need is clearly demonstrated for the site at Old Malling Farm, Lewes. There is no existing local need for housing development at Coldwaltham, but this may emerge later in the plan period. Local need at Greatham derives from the housing register for both rented and intermediate housing, both with a local connection to Greatham and with a local connection to the adjoining parishes of Hawkley and Selborne (where only one site for 8 dwellings has so far been identified). It also derives from the East Hants JCS requirement (to be carried over into the South Downs Local Plan) to find 100 dwellings in villages within the National Park in East Hampshire.
- 5.5 The work on the Lewes JCS has demonstrated that the housing needs of Lewes cannot all be met outside the National Park or elsewhere in the town. There are insufficient suitable sites in other villages to meet the entire requirement for 100 dwellings in East Hampshire National Park villages, as determined through the East Hants JCS after having taken account of provision at Whitehill and Bordon. With regard to any longer term local housing need at Coldwaltham, while it may be possible to find sites outside the designated area in Pulborough, this would not be a true substitute for a site in the village because of poor public transport links.
- 5.6 While the site at Lewes is likely to have a significant beneficial impact on the local economy through employment in the construction industry (especially if a local employment agreement is reached) and through retention of expenditure on local goods and services, the sites at Greatham and Coldwaltham are too small to have anything but a marginal impact.
- 5.7 All three sites are likely to have significant adverse impacts on the environment and natural beauty of the National Park, in terms of designated nature conservation sites/ species, archaeological interest, and cultural heritage (apart from Coldwaltham). The Lewes allocation would also have a major adverse impact on the landscape, although the visual impact of the other two sites is not great. There is, however, the possibility of adequate moderation of these impacts provided the policies set out in the Local Plan: Preferred Options are rigorously applied.

- 5.8 There are also potential adverse impacts on recreational opportunities arising from the Lewes proposal, but less so from the other two sites. Moderation of these impacts is also possible.
- 5.9 On balance it is accepted that the major development at Old Malling Farm is likely to meet the tests for exceptional circumstances in the public interest required by paragraph 116 of the NPPF, subject to the policies set out in the proposed policy.
- 5.10 The site at Greatham will meet the tests, provided robust criteria are included policy to ensure that the tenure and size of housing meets local needs and that appropriate mitigation measures in relation to impacts on the nearby European wildlife sites, to be agreed with Natural England, are provided.
- 5.11 Similarly the site at Coldwaltham is capable of meeting the tests subject to mitigation measures in relation to wildlife sites to be agreed with Natural England; but in this case it is recommended that release of the site should be phased to year 5 or 10 of the plan period and that it be subject to the need for housing to meet local affordable needs or to support the local economy and key services being demonstrated. Appropriate criteria to this effect should be included in the policy.

Appendix A: Allocation Sites- Assessment Table

Policy Ref Site Name No dwellings Area	Description	Landscape Assessment	Other Relevant Constraints or Requirements / HRA Implications	Sustainability Appraisal Summary	Major Dev't?	Reason
SD-SS03 <i>Land at Old Malling Farm, Lewes</i> 200 dwellings 6.6 has net (10 has gross)	<p>Greenfield site on the northern side of the town in a 'green finger' between the 1970s part of the Malling Estate to the east and the River Ouse, mainline railway and Landport Estate to the west. In agricultural use.</p>	<p>Landscape mitigation measures must address the following sensitivities: Views from the site to local landmark features. The strong rural, tranquil and natural character of the Ouse Valley with no development apparent on its eastern banks, save for historic settlement. The visually sensitive western edge of the site above the Ouse Valley floor. The context of the wider Ouse Valley floodplain when viewed from elevated locations. From elevated locations to the west the entire site is clearly visible and separates Old Malling Farm and Lewes Malling Deanery. From elevated locations to the east the northern field of the site is visually prominent and is seen as part of the wider Ouse Valley corridor. The Ouse corridor to the north of Lewes was included in the SDNP as a high quality</p>	<p>SSSI adjacent to the site and within a SSSI Impact Risk Zone. SNCI along the adjacent disused railway cutting on the east of the site. Adjoins Old Deanery Conservation Area and Listed Buildings. Within an area of high archaeological potential, near a medieval settlement and the ruins of a college of Benedictine Canons. Much of the site is best and most versatile agricultural land. Ouse Valley Way runs to the west of the site.</p> <p>HRA implications: this site is 1km from Lewes Down SAC. There is potential for LSE in-combination with other projects and/ or plans. Impact pathways present: Air quality Recreational pressure</p>	<p>Whilst the policy for the site will help limit potential effects, the development will lead to inevitable residual effects on landscape quality, the setting of the historic environment and Best and Most Versatile Agricultural Land. Potential negative effects on biodiversity also have the potential to arise. Development will lead to the sterilisation of Grade 2 and Grade 3a agricultural land. Significant effects on the Malling Deanery Conservation Area can be avoided if the proposed policy approaches are implemented effectively and green infrastructure and design improvements are realised. In terms of positive effects, the policy will deliver housing (including affordable housing) which will help meet local needs and support the vitality of Lewes.</p>	Yes	<p>Scale Potential impact on landscape (views from elevated locations and Hamsey Church; views out of the site to local landmark features). Potential impact on cultural heritage (archaeology, listed buildings and Conservation Area) Potential impact on recreational opportunities (Ouse Valley Way and open access land on surrounding elevated locations) Potential impact on wildlife (SSSI and SNCI) EIA development</p>

Policy Ref Site Name No dwellings Area	Description	Landscape Assessment	Other Relevant Constraints or Requirements / HRA Implications	Sustainability Appraisal Summary	Major Dev't?	Reason
		setting to Lewes town for scenic, cultural heritage and nature conservation reasons.				
SD-WW03 <i>Land at New Road, Midhurst</i> 8 dwellings 0.1 has	Residential garages. Wholly within the settlement boundary.	N/A	Transport assessment required. No HRA implications.	The development of the existing site will facilitate the redevelopment of an underutilised area for housing at an accessible location. This will support a number of the Sustainability Themes. Potential negative effects on biodiversity, flood risk and townscape quality are likely to be minimal.	No	Small scale – less than 0.5 has and 10 dwellings. Brownfield site within settlement boundary.
SD-WW04 <i>Land at Petersfield Road, Midhurst</i> 40 dwellings 1.3 has	Two large residential plots. Wholly within the settlement boundary.	Low/Medium Sensitivity The site does not have wider landscape impact and is within an area of existing housing. Existing trees are important to local amenity along A272.	Transport statement will be required. TPO adjoining site and other mature trees within site. Protect trees and consider boundary treatment. Landscape Appraisal (LA) required Ecological survey required. No HRA implications.	Due to the location of the site and the implementation of appropriate policy responses, the development of housing at this site is unlikely to have negative effects on biodiversity, landscape quality, the historic environment or climate change adaptation. As an accessible location, the allocation will support the use of sustainable modes of transport, healthy lifestyles, cultural activity, climate change mitigation and the vitality of Midhurst.	No	Within settlement with no major constraints, although development for 40 dwellings could threaten tree cover. Requirements for LA, ecological survey and transport statement imply some potential for harm but this is unlikely to be serious and should not be a determining factor.

Policy Ref Site Name No dwellings Area	Description	Landscape Assessment	Other Relevant Constraints or Requirements / HRA Implications	Sustainability Appraisal Summary	Major Dev't?	Reason
SD- WW05 <i>Land at Lamberts Lane, Midhurst</i> 15 dwellings 0.4 has	Hard surface of tennis/netball courts, two single storey buildings (previously a youth club and Women's Institute) south of the tennis courts, an overgrown and treed area west of the tennis courts. Wholly within the settlement boundary.	Medium Sensitivity due to brownfield status. Conservation area and high visibility of site needs to be factored into design process. Careful appropriate local character approach.	Adjacent to the Conservation Area; Grade II listed building nearby (to the east); Heritage Statement required. Transport statement may be required. LA required. Ecological survey required. Demonstrate no loss of existing community facilities. No HRA implications	As an accessible location, the allocation at this site will support the use of sustainable modes of transport and promote healthier lifestyles, climate change mitigation and the vitality of Midhurst. The proposed allocation will lead to the loss of (currently disused) community facilities. Allocations at this location also have the potential to lead to effects on townscape quality and the setting of historic environment assets and areas of value present locally.	No	A brownfield site of less than 0.5 has. within settlement boundary. 15 dwellings not large in the context of Midhurst (c4,900 population). Community facilities available in new school, Despite requirements for Heritage Statement, ecological survey, LA and TA, these should not be a determining factor and constraints are likely to be capable of mitigation.
SD- WW09 <i>Land at Clements Close, Binsted</i> 12 dwellings 0.5 has	Agricultural land, adjacent residential development and the settlement boundary to the north. There is thick belt of trees and hedgerow on the south and east boundary.	Low/Medium Sensitivity The site is not widely visible and relates to the existing recent settlement pattern.	Within 5km of SPA and SAC. Archaeological assessment required. Ecological survey required. Retain existing mature trees and hedgerows around site. Contribute to East Hants Hangers Biodiversity Opportunity Area. Be consistent in density and character with existing.	The proposed allocation is located in proximity to areas of significant ecological sensitivity. Whilst the policy presents a number of approaches for supporting the biodiversity value of the site, potential effects on biodiversity will need to be carefully managed. The site is accessible to existing village facilities and amenities, including the	No	Low/Medium Sensitivity. 12 dwellings not large in context of c1650 population. Contained by trees/ built up area. Despite requirement for surveys, these should not be a determining factor, severe harm is unlikely and constraints are likely to be capable of mitigation. Potential for biodiversity enhancement.

Policy Ref Site Name No dwellings Area	Description	Landscape Assessment	Other Relevant Constraints or Requirements / HRA Implications	Sustainability Appraisal Summary	Major Dev't?	Reason
			HRA implications: This site is located 3km from the Wealden Heaths Phase II SPA. Impact pathways include: Recreational pressure	school, pub and recreation ground. However, the site is not in close proximity to shops and other services and is relatively poorly connected by public transport networks. This may increase the need to travel by the private car. The allocation is unlikely to have significant effects on landscape quality or the historic environment.		
SD-SS02 <i>Land at Kiln Lane, Buriton</i> 7 dwellings 0.2 has	The site is agricultural land adjacent to the settlement boundary and part of a larger field.	Medium Sensitivity, being consistent with the settlement pattern in close proximity to the scarp slope. Site has been redefined to omit most sensitive area.	Within 70m of SINC and Ancient Woodland site; within 5km of SAC. Transport statement may be required. LA required. Consider boundary treatment/ retention of hedgerows/ access and frontage onto Kiln Lane. Noise attenuation may be required. Ecological survey required. Archaeological assessment required. Contribute to East Hants Hangers Biodiversity Opportunity Area.	The allocation is unlikely to have significant effects on biodiversity, landscape quality or the historic environment. The site is accessible to existing village facilities and amenities, including the school, pub and sports facilities. The site is also accessible to the wide range of services, facilities and amenities located in Petersfield, further supported by the bus links. The site is located close to the railway line, as acknowledged by the proposed policy. Uncertain whether the site will lead to	No	Small scale – less than 0.5 has and 10 dwellings. Contained by trees/ built up area. Despite requirements for surveys, these should not be a determining factor, serious harm is unlikely and constraints are likely to be capable of mitigation. Potential for biodiversity enhancement.

Policy Ref Site Name No dwellings Area	Description	Landscape Assessment	Other Relevant Constraints or Requirements / HRA Implications	Sustainability Appraisal Summary	Major Dev't?	Reason
			No HRA implications.	the loss of 'Best and Most Versatile Agricultural Land.'		
SD- WW11 <i>Land at Brookland Way, Coldwaltham</i> 20 dwellings 1.0 has	Agricultural land adjacent to the settlement boundary and part of a larger field.	Medium / High Sensitivity due to its proximity to SSSI and Open Access Land. Access from adjacent development would be essential if ecological issues are surmountable.	SSSI site adjacent to the site; within a SSSI Impact Risk Zone; within 100m of SPA/ Ramsar site. LA required. Transport statement may be required. Ecological survey / boundary treatment required. HRA implications: site is 120m from Arun Valley Ramsar and SPA, and 650m from the SAC. Also 3.8km from Duncton to Bignor Escarpment SAC, and 2.6km from The Mens SAC. Potential impact pathways: <ul style="list-style-type: none"> - Loss of supporting habitat for barbastelle bats at Mens SAC. - Loss of supporting habitat for Bewicks Swan - Water quality - Absence of nutrient enrichment 	Located within an area of significant ecological sensitivity, with Waltham Brooks SSSI and the Arun Valley SPA and Ramsar site nearby. Proposed approach to protection of biodiversity assets is unlikely to ensure that potential effects on nature conservation are avoided. Accessible to existing village facilities and amenities, including the school and pub. Also accessible to the range of services, facilities and amenities in Pulborough. However, bus links between the two settlements are poor. This has the potential to encourage the use of the private car. The allocation is unlikely to have significant effects on landscape quality or the historic environment.	Yes	Medium/ High Sensitivity. Scale – 20 dwellings significant in the context of Coldwaltham (population c850). Proximity of SSSI, Ramsar site and SPA. HRA implications include potential serious harm to wildlife / natural beauty. Need for surveys indicates potential for harm, although not a determining factor. Possible serious harm to views from Open Access Land.
SD-WW01 <i>Land east of Cowdray Road, Easebourne</i>	Grazing land and car parks adjacent to the settlement boundary. Approx. 1 km from	Medium sensitivity due to enclosed nature of site. Historic impact assessment needed given surrounding context and hole in Historic	Adjacent to the Conservation Area and two grade II listed buildings (to the east); Heritage Statement required.	Whilst development at this location has the potential to have negative effects on features and areas of historic environment and townscape	No	Within built up area. 14 dwellings not large in the context of Easebourne/ Midhurst together (population c6,600) or even

Policy Ref Site Name No dwellings Area	Description	Landscape Assessment	Other Relevant Constraints or Requirements / HRA Implications	Sustainability Appraisal Summary	Major Dev't?	Reason
14 dwellings 0.7 has	Midhurst centre.	Landscape Characterisation data.	Transport statement may be required. LA required. Consider street frontage on Egmont Road and boundary treatment. Ecological survey and retention of hedgerows required. No HRA implications.	value, the proposed policy provides a robust approach to ensuring that the fabric and setting of cultural heritage assets are protected and enhancements facilitated. The site has good accessibility to the services and facilities in Midhurst by walking/cycling and public transport.		Easebourne alone (c1,700) Relationship to Listed Buildings not significant (to their rear). Despite requirements for surveys, serious harm is unlikely and this should not be determining factor. Landscape, heritage and ecological constraints are likely to be capable of mitigation.
SD-WWI0 <i>Land at Petersfield Road, Greatham</i> 30 dwellings 2.4 has	Disused plant nursery adjacent to the settlement boundary. Surrounded by residential properties to the north-east, agricultural land to the south, and a village hall and school to the west.	Medium Sensitivity. The size of the site and its location within the centre of the settlement makes it more sensitive than would normally occur for a site which is previously developed land. The site is in a prominent position. It is well screened behind a mature hedgerow, although the roofs of the existing glasshouses can be seen above this. Public right of way along south-eastern boundary, but views are limited.	Transport statement required. LA required. Retention of hedgerows/ consideration of boundary treatment required. Archaeological assessment required. Adjacent to (across road from) Grade II Listed Building and Conservation Area; Heritage Statement required. Contribute to Rother Valley Biodiversity Opportunity Area. Within Minerals Consultation area. HRA implications: this site is located 600m from Wealden	The location of the site close to Wealden Heaths Phase II SPA and within the SSSI Impact Risk Zone for the Woolmer Forest SSSI/ SAC is a significant constraint. This is recognised by the policy, which highlights consultation with Natural England. Effects on historic environment assets and archaeology of the site will be limited by the proposed policy approach. The development of 30 dwellings at the site will help meet local housing needs and support the vitality of the local area. The site is also accessible to village amenities, and relatively	Yes	Large site in relation to village (c800 population, c400 dwellings). Strictly not brownfield – a nursery is an agricultural use and therefore excluded from the definition of Previously Developed Land in the Glossary to the NPPF. Significant constraint from proximity to European sites. Potential for serious harm in terms of wildlife impact arising from proximity to European sites, as identified by HRA. Need for LIA, archaeological assessment, Transport and Heritage Statements indicates potential for harm, although not a determining

Policy Ref Site Name No dwellings Area	Description	Landscape Assessment	Other Relevant Constraints or Requirements / HRA Implications	Sustainability Appraisal Summary	Major Dev't?	Reason
			Heaths Phase II SPA, 1.4km from Woolmer Forest SAC, 1.5km from East Hampshire Hangers SAC & 5.2km from Shortheath Common SAC. Potential impact pathways: – Recreational pressure (bird breeding season) and habitats – Water quality - Water quantity	accessible to Liss by bus.		factor.
SD-WD01 <i>Land at Itchen Abbas House</i> 8 dwellings 0.7 has	Grassed area adjacent to the settlement boundary of Itchen Abbas. Set within established mature grounds of Itchen Abbas House. It is located at the lowest part of the site and relates well to surrounding built form and the settlement pattern.	Low/Medium Sensitivity Landscape impact could be minimised provided development is well designed and in character with the surrounding built form.	River Itchen SSSI and SAC nearby and within a SSSI Impact Risk Zone. Ecological survey required. Contribute to Itchen Valley Biodiversity Opportunity Area. Should not harm amenity of adjoining public footpath. HRA implications: this site is located within 50m of the River Itchen SAC. Impact pathways present: – Water quantity (maintenance of flow velocity) - Water quality (siltation and low nutrient inputs)	Given the scale of the proposed development, its relationship with the existing village, and the use of previously developed land it is likely that housing on this site would have a relatively neutral effect – and, in the case of housing and the rural economy, a positive effect. Some uncertainty remains about effects on biodiversity and health (potentially contaminated land). With appropriate mitigation these might be resolved, although the provision of public transport to this small rural community may present a greater challenge. There are also opportunities that could be realised through the	No	Low/ Medium Landscape Sensitivity. Small capacity. Despite requirement for ecological survey, this should not be a determining factor and ecological constraints are likely to be capable of mitigation/ enhancement. No requirement for other assessments. HRA implications relate to water quality/ quantity and not directly to natural beauty/ wildlife.

Policy Ref Site Name No dwellings Area	Description	Landscape Assessment	Other Relevant Constraints or Requirements / HRA Implications	Sustainability Appraisal Summary	Major Dev't?	Reason
				development of the site.		
SD-DS01 <i>Land between Church Lane and the A273, Pyecombe</i> 8 dwellings 1 ha	Agricultural land within the settlement boundary.	Medium Sensitivity due to views from the surrounding downland and public right of way network. These are in the context of the surrounding trunk road junction and service station. Existing hedgerow is important to retain and development should reflect surrounding densities to minimise visual impact and maintain consistency with surrounding character.	Retention of hedgerows on and round site required. LVIA required. Noise attenuation measures required. Contribute to Stanmer and Ditchling Downs Biodiversity Opportunity Area. No HRA implications.	The proximity to the A273 is a key concern in terms of the health and wellbeing of future residents. Important to consider how noise and air pollution can be adequately mitigated (e.g. through the uptake of green infrastructure options). The policy will help limit potential effects on biodiversity and the setting of the historic environment and facilitate enhancements. Any future development is likely to help meet local housing need, although whether it will help meet demand for affordable local housing is less clear. New residents may support the viability of local businesses and the rural economy, whilst accessibility to larger settlements (including Burgess Hill) and their wider services is good, with sustainable transport options available.	No	Although area of site is large in the context of Pyecombe and 8 dwellings are also significant (c200 population), it falls below 2010 Order definition as <10 dwellings proposed; site is within settlement boundary. Views of it are dominated by busy main roads and a petrol station. Requirements for LVIA and hedgerow retention indicate potential for harm, but this is not a determining factor and harm is unlikely to be serious, subject to retention of hedgerow.
SD-WW02 <i>Land at</i>	Agricultural/grazing land adjacent to the settlement	Medium Sensitivity due to its enclosed nature. The existing stream and trees	Noise attenuation measures required. Tree Preservation Orders	It will be important to consider landscape impacts during the design of any	No	No major constraint. 15 dwellings not large in context of Sheet and

Policy Ref Site Name No dwellings Area	Description	Landscape Assessment	Other Relevant Constraints or Requirements / HRA Implications	Sustainability Appraisal Summary	Major Dev't?	Reason
<i>Farnham Road, Sheet</i> 15 dwellings 0.9 has	boundary of Sheet.	are notable character features which are sensitive to development particularly on the sloping topography where gradients would need to be altered. Views from adjoining residential properties. Site capacity may be limited.	on site – require retention and buffering. Buffer required along stream. Contribute to Rother Valley Biodiversity Opportunity Area. No HRA implications.	residential development on this site, especially in terms of visual impacts (given the site topography) and the safeguarding of protected trees. The protection of these mature trees may protect biodiversity value, whilst the policy supports mitigation in relation to the Rother Valley Biodiversity Opportunity Area. The proximity of the site to a stream means that areas of the site are within Flood Risk Zones 2 and 3. This is recognised by the policy. An advantage to this site is its proximity to Petersfield, with good accessibility to services, facilities and amenities via sustainable transport options and the rail network. The quantum of development to be delivered will help meet local needs.		Petersfield together (>16,000 population). Trees and stream can be dealt with by condition. Within built-up area/ infill. Lack of requirements for surveys indicates limited potential for serious harm, although this is not a determining factor. Potential for biodiversity enhancement.
SD- SS01 <i>Land south of Loppers Ash, South Harting</i>	Agricultural/grazing land adjacent to the settlement boundary of South Harting.	Medium Sensitivity due to the views towards the chalk ridge and the edge of settlement location. Careful development with density to mirror existing and adjacent	LA required Archaeological assessment required. Form of development to continue existing- low / medium density.	Positive effects include the provision of new housing to meet local needs and benefits associated with the vitality of South Harting. Potentially constrained from	No	Small scale – less than 10 dwellings and 0.5 has. Infill development. Limited requirement for surveys indicates limited potential for harm, although


Policy Ref Site Name No dwellings Area	Description	Landscape Assessment	Other Relevant Constraints or Requirements / HRA Implications	Sustainability Appraisal Summary	Major Dev't?	Reason
8 dwellings 0.4 has		properties would not appear incongruent.	Consider boundary treatment. No HRA implications.	an archaeological heritage perspective and it will be important that any potential impacts are identified and suitably mitigated. This is recognised by the policy. No significant biodiversity constraints. Limited access by sustainable transport modes due to poor connections to Petersfield by bus.		this is not a determining factor.
SD-SS07 <i>Land at Meadow House, West Meon</i> 6 dwellings 0.2 has	Part of a large residential garden within the settlement boundary. Given the landscape assessment and other constraints development is to be limited to the northern part of the site.	Medium Sensitivity The site is visible from local public right of way, is located on key landscape features (River Meon and railway line) and is adjacent to conservation area on 2 sides. Heavily constrained site within the Settlement Policy Boundary. Mature trees. Site has been defined to exclude more sensitive area to the south	Transport Statement may be required. Heritage Statement required. Consider boundary treatment. River Meon SINC close to the south of the site. Protected species recorded in vicinity. Ecological survey required. Contribute to Meon Valley Biodiversity Opportunity Area. Amenity of PRoW to be protected. No HRA implications.	Potential to support local housing needs, boost the rural economy and promote the viability of local facilities and services. The policy recognises the rich historic environment of West Meon through seeking a Heritage Statement. It also recognises the potential biodiversity value of the site. Accessibility to the existing range of services and facilities in West Meon is good; but accessibility by public transport to Petersfield and Winchester is limited by a two hourly bus service.	No	Small scale – less than 10 dwellings and 0.5 has. Within settlement boundary. Requirements for surveys/ protection of PRoW indicate potential for harm, but this is not a determining factor. Potential for biodiversity enhancement.

Policy Ref Site Name No dwellings Area	Description	Landscape Assessment	Other Relevant Constraints or Requirements / HRA Implications	Sustainability Appraisal Summary	Major Dev't?	Reason
SD-SS06 <i>Land at Long Priors, West Meon</i> 10 dwellings 0.3 has	Part of a larger agricultural field between residential development to the west and a recreation ground to the east.	Medium / Low Sensitivity owing to influence of adjacent housing development. The site is visible from local public right of way, and is located on key landscape features (River Meon Valley sides).	Transport statement may be required. LVIA required. Retention of existing mature trees. Site covered by Source Protection Zone 2. Consider boundary treatment. Site has been defined to exclude more visible area to the north. No HRA implications.	Groundwater sensitivity is a consideration for this site and potential negative effects will need to be identified and appropriately mitigated. This issue is addressed by the proposed policy. Important to consider how development might affect the landscape character of West Meon and the surrounding area. In this context the policy requires a LA and retention of mature trees. Biodiversity and climate adaptation benefits to be secured through landscape work. Accessibility to the existing range of services and facilities in West Meon is good; but accessibility by public transport to Petersfield and Winchester is limited by a two hourly bus service.	No	Medium / Low Sensitivity. Small area – less than 0.5 has. Requirements for surveys indicate potential for harm, although this is not a determining factor. Groundwater sensitivity not an issue in relation to potential serious harm to natural beauty or directly to wildlife. Potential to enhance biodiversity.
SD-DS03 <i>Land at Hoe Court, Lancing</i> 15 dwellings	Agricultural land adjacent to the settlement boundary of Lancing on the boundary of the National Park.	The site is Medium / High sensitivity due to its open and exposed nature above the A27. The site is prominent in the landscape to the north of the A27, forming part of the	Lancing Ring Local Nature Reserve (chalk grassland) immediately to the north-west. LA required. Transport statement may be required.	One of the key constraints is the presence of the A27. Need to take into account the potential landscape and visual effects of development. This is reflected by the policy requiring a LVIA along with	No	Medium / High Sensitivity relates to a larger site; the more open part of the site has been omitted since. Scale not great in the context of the urban area to the south.

Policy Ref Site Name No dwellings Area	Description	Landscape Assessment	Other Relevant Constraints or Requirements / HRA Implications	Sustainability Appraisal Summary	Major Dev't?	Reason
I ha		downland setting to the A27 at the eastern edge of Lancing. Existing development is visible within the wooded boundaries of the field to the west of the access lane, although these are not visually prominent in the wider landscape due to the wooded nature of the field boundaries and adjacent copse.	Ecological survey required. Important PROW in the vicinity of the site. Site has been defined to exclude more sensitive area to the north and east. No HRA implications.	careful consideration of the boundary treatment of the site. Consideration should be given to the role of green infrastructure solutions in this, with planting potentially able to contribute to landscape value and help reduce noise pollution. The development will help meet local housing needs and support the vitality of the local area. However, effects are unlikely to be significant.		Proximity of LNR and requirements for LA and ecological survey indicate potential for harm, although this is not a determining factor. Redefinition of site has taken it away from LNR and public rights of way; potential impact on park/ allotments relates to recreational opportunities outside the National Park. Potential for landscape enhancement.
SD-DS02 <i>Land at Normansal Park Avenue, Seaford</i> 20 dwellings I ha	Currently in use as open space and recreation ground. Access actually from Maple Fields. Can link with adjoining site to west (outside National Park).	Medium/High Sensitivity due to site being a valued local open space, the views of woodland, the sea and the downs which are possible on site and connections to PRoW network to the north. Alternative location for open space would be required & comparable site unlikely. Site along Normansal Park Avenue to the west appears to be more suitable.	Tree preservation order along western boundary; retention of existing mature trees and buffering of protected trees required. Within a SSSI Impact Risk Zone. LA required. No HRA implications.	A major constraint facing this site is its current use as an open space and recreation ground. However, proposed policy requires compensatory improvement, enhancement or replacement, so negative impacts should be mitigated. Within a SSSI Impact Risk Zone - consultation with Natural England, as proposed by the draft policy, will help ensure that potential impacts on the biodiversity are identified and appropriately mitigated. Parts of the site have been	No	Medium/High Sensitivity but the more open part of the site has been omitted since. Scale not great in relation to the town of Seaford. Proximity of SSSI and requirement for LA indicate potential for harm, although this is not a determining factor.

Policy Ref Site Name No dwellings Area	Description	Landscape Assessment	Other Relevant Constraints or Requirements / HRA Implications	Sustainability Appraisal Summary	Major Dev't?	Reason
				<p>established as having medium/high landscape sensitivity. An LA will be required and should inform the design and layout of the site proposals. These will need to carefully consider boundary treatment and retain mature trees.</p> <p>The development will help meet local housing needs and support the vitality of the local area. The site is also relatively accessible by a range of transport modes.</p>		

Appendix B: Major Site Assessments

SD-SS03	Land at Old Malling Farm, Lewes	
		
<p>Need for Development</p>	<p>Impact on Local Economy</p>	<p>Scope for meeting the need in some other way</p>
<p>See Lewes JCS and SHMA. Lewes town has significant housing needs (for both open market and affordable housing). The District Council's Housing Register consistently shows well in excess of 400 households seeking affordable housing in the town. The town also experiences a relatively buoyant housing market in comparison with the other towns in the district.</p>	<p>The development would assist the local construction industry. Large scale of development could help retention of expenditure in Lewes and support town centre and other facilities.</p>	<p>See Lewes JCS. Opportunities for the outward expansion of Lewes town are extremely limited, due to the sensitive and high quality National Park landscape, and the extensive floodplain of the River Ouse. Most development opportunities are within the town, through the redevelopment of a limited number of sites. Most of these opportunities are small-scale and would be expected to come</p>

		forward through the development management process or the Lewes Town Neighbourhood Plan. The only other sizeable site is North Street Quarter, but this will not meet all housing needs.
Detrimental Effects on Environment / Extent of Moderation	Detrimental Effects on Landscape/ Extent of Moderation	Detrimental Effects on Recreational Opportunities/ Extent of Moderation
<p>There are several potential detrimental effects on the environment as a result of this development:</p> <ul style="list-style-type: none"> • Loss of best and most versatile agricultural land (grade 2 & 3a). • Impact on Offham Marshes SSSI to the west of the River Ouse and the SNCI along the disused railway cutting to the east. • Impact on high archaeological potential (medieval settlement and the ruins of a college of Benedictine Canons). • Effect on setting of Hamsey Church and its visual association with Lewes and of the Malling Deanery Conservation Area. • Undermining the character of historic settlement along the river and the extent to which it contributes to scenic quality of the area as a whole. • Narrowing the perceived and physical width of the green corridor currently penetrating the town and its role as a setting to the town. 	<p>A Landscape Impact Assessment was carried out in April 2012. The key sensitivities were:</p> <ul style="list-style-type: none"> • Views from the site to local landmark features. • The strong rural, tranquil and natural character of the Ouse Valley with no development apparent on its eastern banks, save for historic settlement. • The visually sensitive western edge of the site above the Ouse Valley floor. • The context of the wider Ouse Valley floodplain when viewed from elevated locations. • From elevated locations to the west the entire site is clearly visible and separates Old Malling Farm & Lewes Malling Deanery. • From elevated locations to the east the northern field of the site is visually prominent and is seen as part of the wider Ouse Valley corridor. • The Ouse corridor to the north of Lewes was included in the SDNP as a high quality setting to Lewes town. 	<p>While not currently accessible to the public, the site is an important setting for the Ouse Valley Way as it emerges from Lewes. Development could change the character of a significant length of this path from rural to suburban, undermining the sense of tranquillity and naturalness readily perceived along the footpath. Some moderation is possible by setting development back from the bank below which the path runs.</p>
Conclusions		
<p>The SDNPA originally considered that this site should not be developed and would not meet the major development test. It did not therefore include it as a strategic site in the Lewes Joint Core Strategy (JCS). However, the Inspector at the Examination had a different view and requested that a Modification be made to the plan in respect of this site if he was to find the JCS sound.</p> <p>In the light of the need for housing, especially affordable housing, within Lewes and the importance which the Inspector attached to meeting this need as far as possible, it is considered that an exceptional circumstance can be demonstrated in terms of need. Moreover, the JCS has demonstrated that this need cannot be fully met outside the designated area of the National Park, although sites at Ringmer and Cooksbridge do make a contribution.</p> <p>Consideration must then be given to the severity of the adverse environmental, landscape and recreational impacts and the extent to which they can be moderated. The 2012 Landscape Assessment sets out various ways in which the adverse landscape impacts can be mitigated and these are included in the criteria set out in the draft policy for consideration as a modification by the JCS Inspector. The criteria also address the other potential adverse impacts. Subject to these criteria and the Inspector maintaining his view, following further examination, that the site should be allocated for development, it is must be reluctantly accepted that the tests for exceptional circumstances in the public interest are met.</p>		

**SD-
WW11**

Land at Brookland Way, Coldwaltham



Need for Development

The SHMA estimates housing need for the part of Horsham within the SDNP to be 13 dpa. Coldwaltham is one of three villages in the Horsham part of the SDNP with settlement boundaries but no suitable sites have been identified in the others (Amberley and Washington). The housing register shows 40 dwellings currently seeking dwellings to rent in Coldwaltham but very few of these are likely to constitute local need. It is anticipated that the approved site at Silverdale, soon under construction, will meet immediate rented housing need.

Impact on Local Economy

The development could assist the local construction industry, depending on the extent to which local firms are used. Its size is unlikely to be sufficient to justify provision of new facilities and businesses and it will have only a marginal effect in helping the retention of existing facilities and businesses.

Scope for meeting the need in some other way

In terms of meeting longer term need, the SHLAA has looked at other sites in the village and did not find them suitable, apart from the Silverdale site and a site for 6 dwellings west of Besley Farm in the nearby hamlet of Watersfield. While it may be possible to find sites outside the designated area in Pulborough, these would not be true substitutes for sites in the village because of poor public transport links.

Detrimental Effects on Environment / Extent of Moderation	Detrimental Effects on Landscape/ Extent of Moderation	Detrimental Effects on Recreational Opportunities/ Extent of Moderation
<p>The site is within 100 metres of the Waltham Brooks SSSI (and so is within a SSSI Impact Risk Zone and within 650 metres of the Arun Valley SPA and Ramsar site. The effects on biodiversity will need to be further considered through the next stages of plan development. The site boundary is defined so as to leave a buffer between it and the SSSI site. Other land in the same ownership is available if needed to mitigate impacts on the SSSI.</p>	<p>Medium / High Sensitivity due to its proximity to SSSI and Open Access Land. The site constitutes an unexceptional flat field and is a logical southerly extension of the existing housing to the north of Brookland Way.</p>	<p>The SSSI is also Open Access land and so the recreational experience of enjoying the SSSI could be adversely affected. However, the site is screened from the Open Access land by mature trees and development on it would be viewed against existing development in Coldwaltham.</p>
<p>Conclusions</p>		
<p>Although there are 40 households in Horsham who have chosen Coldwaltham as an area of choice, few of these will have a local connection to the parish and so would not necessarily be local. Existing local needs for social rented housing in Coldwaltham are likely to be met by the recently approved site at Silverdale, which is about to commence construction. The SHMA identifies a longer term demographic need for 13 dwellings per annum in the Horsham part of the National Park. It may be appropriate to meet a proportion of this need in settlements in the SDNP to support local employment and services and subject to landscape and other constraints; but there are limited opportunities to do so in other villages.</p> <p>In terms of meeting some this longer term need in Coldwaltham, other potential sites identified by the SHLAA are not considered suitable, apart from the Silverdale site and a site for 6 dwellings in nearby Watersfield. While it may be possible to find sites outside the designated area in Pulborough, this would not be a true substitute for a site in the village because of poor public transport links.</p> <p>The landscape sensitivity derives from the ecological and recreational attributes rather than from visual impact per se. Development of the site has potential serious impacts on the nearby SSSI/ SPA/ Ramsar site as well as on other more distant SACs. These potential adverse effects on the environment and recreational opportunities are mitigated by existing mature trees screening the site from the south east and are capable of further moderation by virtue of the buffer strip proposed. Further mitigation may be possible on land in the same ownership.</p> <p>In order to demonstrate exceptional circumstances, it will be necessary to carry out a local housing needs survey in the parish to supplement the longer term demographic in the SHMA and to take account of the completion of the 8 units at Silverdale. It is likely that this need will not be evident until later in the plan period and that release of this site will need to be phased for the second or third 5 years of the plan period. An additional criterion to this effect will therefore need to be included in the site allocation policy at the next stage of plan preparation. Subject to this and to the mitigation measures referred to above, it is considered that the tests for exceptional circumstances in the public interest could be met.</p>		

**SD-
WW10**

Land at Petersfield Road, Greatham



Need for Development

9 households with a local connection with the Parish are currently seeking rented dwellings in Greatham; a further 13 are registered for intermediate housing. Also 11 households with a local connection to Selborne and one with a link to Hawkey need dwellings to rent, while 5 households with a local connection to Selborne and 2 to Hawkey are registered for intermediate housing. The EHJCS requires sites for 100 dwellings to be allocated in the villages in the National Park.

Impact on Local Economy

The development could assist the local construction industry, depending on the extent to which local firms are used. Its size is unlikely to be enough to justify provision of new facilities and businesses and it will have only a marginal effect in helping the retention of existing facilities and businesses.

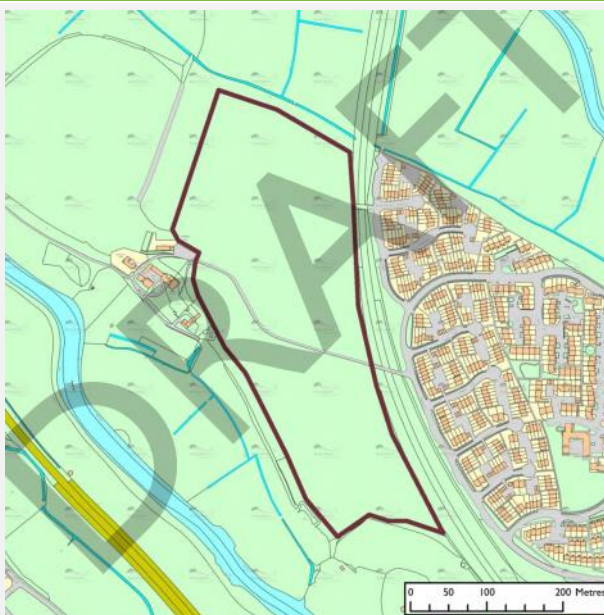
Scope for meeting the need in some other way

Greatham is close to the Whitehill Bordon strategic development which will provide 2725 new houses over the next 15 years. However this has already been taken into account by the JCS in setting the requirement for 100 dwellings in East Hants villages. The SHLAA indicates that there are insufficient suitable sites to meet all this need in other villages with settlement boundaries. Some local need can be met on a suitable SHLAA site at Ketchers Field in Selborne (not allocated) but this is not sufficient.

Detrimental Effects on Environment / Extent of Moderation	Detrimental Effects on Landscape/ Extent of Moderation	Detrimental Effects on Recreational Opportunities/ Extent of Moderation
<p>Some archaeology interest, so an archaeological assessment is required; mitigation should be carried out in accordance with its findings.</p> <p>Adjacent to (across road from) Grade II Listed Building and adjacent to a Conservation Area, so a heritage statement is required; mitigation should be carried out in accordance with its findings.</p> <p>Approximately 600m from the Woolmer Forest SSSI and SAC which forms part of the Wealden Heaths Phase II SPA, a site of international importance for breeding bird species listed in Annex I of the Birds Directive. Mitigation in the form of SANGS is likely to be required in order to relieve recreational pressure.</p>	<p>Medium Sensitivity.</p> <p>The size of the site and its location within the centre of the settlement makes it more sensitive than would normally occur for a developed site.</p> <p>The site is in a prominent position. It is well screened behind a mature hedgerow, although the roofs of the existing glasshouses can be seen above this.</p>	<p>There is a public right of way along south-eastern boundary, but views of the site are limited.</p> <p>Development is unlikely to have a significant detrimental effect on the experience of using this footpath.</p> <p>SANGs could enhance local recreational provision.</p>
Conclusions		
<p>The site is larger than needed to meet local housing needs in Greatham but could also make a contribution to meeting the local and affordable needs of adjoining parishes, where opportunities are limited for landscape and other reasons. It could also make a small contribution towards the market housing needs of the wider HMA, although most of these could be met in nearby Whitehill and Bordon. However the site is required to help meet the requirements inherited from the EH JCS for 100 dwellings to be allocated in the villages of East Hants within the National Park, which are over and above the Whitehill and Borden provision. Not all of these can be found in villages with settlement boundaries elsewhere.</p> <p>The allocation is in a sustainable location between existing housing and the primary school and near to the village hall. The size and tenure of housing should be such as to meet local and affordable needs and not those of commuters using the nearby A3.</p> <p>In terms of detrimental impacts on the environment, landscape and recreational opportunities, the site itself is relatively free of major environmental constraints, its landscape impact would be limited and its effect on the adjoining right of way would be minimal. However its proximity to important European wildlife sites threatens to have a detrimental impact. Subject to mitigation measures (such as SANGs) to deal with this, and to a criterion being introduced to the policy to ensure that the tenure and size of housing meets local needs, it is considered that the tests for exceptional circumstances in the public interest are met.</p>		

Appendix C: Sustainability Appraisal Findings for the Major Sites

Policy SD-SS03: Land at Old Malling Farm, Lewes



Number of allocations: c. 200 dwellings

Approximate size of site: c.10 ha

Sustainability Theme	Rating	Commentary
Landscape	-	<p>The site has the potential to have impacts on views from surrounding areas. In this context a range of sensitivities have been highlighted for the site, including the following:</p> <p>A strong sense of place; the visually sensitive western edge of the site; the site's impact on views from elevated locations to east and west; impacts on the context of the River Ouse floodplain; impacts on the setting of Old Malling Farm / Lewes Malling Deanery; and a recognition of the Ouse corridor to the north of Lewes providing a high quality setting to Lewes.</p> <p>These sensitivities are recognised through the policy's focus on: high quality design and layout as reflecting its National Park location; its aim to ensure that development is consistent with positive local character and local distinctiveness (including its relationship to the Malling Deanery Conservation Area); its promotion of appropriate densities at different locations of the sites; its protection and enhancement of the views from elevated chalk hills to the east and west and from Hamsey in the north; and the policy's promotion of green infrastructure enhancements.</p> <p>The policy also seeks to limit effects on light pollution from the development.</p> <p>Whilst the policy approach will help limit effects on visual amenity, the development of this greenfield site will have inevitable, and potentially significant effects, on landscape quality.</p>

Climate Change Adaptation	?	<p>Whilst the site is not located within a Flood Zone 2 or 3, the susceptibility of surrounding areas to flooding (including related to the River Ouse) leads to potential effects from new development at this location on fluvial and surface water flooding. The policy seeks to address this through ensuring that a site specific flood risk assessment is undertaken and an appropriate surface water drainage strategy (including implementation) is agreed.</p>
Biodiversity	?	<p>The proposed site is located within 200m from the Offham Marshes SSSI, which is located on the western side of the River Ouse. The two units of the SSSI located closest to the site have been evaluated to be in 'favourable' and 'unfavourable recovering' condition.</p> <p>The site is located within an SSSI Impact Risk Zone for 'all development'. As such, development in the region of 200 dwellings raises the possibility of adverse effects on the Offham Marshes SSSI without avoidance and mitigation measures.</p> <p>The disused railway cutting on the east of the site has been designated as the South Malling Disused Railway SNCI. The northern part of the site is located on Coastal and Floodplain Grazing Marsh 'additional' BAP Priority Habitat.</p> <p>The site is located within the Brighton and Lewes Downs Biosphere Reserve, which is part of a global network of Biosphere Reserves recognised by UNESCO as '<i>special places for testing interdisciplinary approaches to understanding and managing changes and interactions between social and ecological systems, including conflict prevention and management of biodiversity</i>'.</p> <p>The policy seeks to ensure that '<i>appropriate measures are implemented to mitigate adverse impacts</i>' on the SNCI and the SSSI and that fields which are in the same ownership as the site but outside the developable area, are designated as Local Nature Reserves and/or Local Green Space, with appropriate management mechanisms put in place. The policy also seeks to ensure that trees and hedgerows are protected where appropriate. This will help mitigate potential effects on biodiversity features and areas of biodiversity value and ecological features in the area.</p>
Cultural Heritage	-	<p>Development of 200 dwellings at this site has the potential to have effects on the Malling Deanery Conservation Area, which is located adjacent to the site to the south. Five listed buildings are present in the Conservation Area, including the Grade II* listed Malling Deanery, the Grade II listed Church of St Michael and the Grade II listed Church Lane Bridge, Malling Rectory and Gateway to Malling Deanery.</p> <p>One Grade II listed structure is located at Old Malling Farm (ruins of a College of Benedictine Canons) to the west of the site.</p> <p>The policy will help limit potential effects on these features and areas of historic environmental importance through seeking to '<i>ensure that development respects the character, amenity and setting of the Conservation Area and the Church of St Michael</i>.' However, inevitable effects on the setting of the conservation area and listed buildings are likely to take place.</p> <p>The site is located within an area of High Archaeological Potential. This is recognised by the policy which seeks to ensure that studies are undertaken to evaluate the archaeological value of the location.</p>

Cultural Activity		The site is located in good proximity to the cultural services offered by Lewes. The allocation is unlikely to have significant positive or negative effects relating to sustainable tourism.
Health and Wellbeing	+	The site is located approximately 1.3 km from the High Street when accessed by foot/cycle. It has relatively good access to existing residential areas and pedestrian and cycle networks- and the policy seeks to put in place measures to improve access to the site by non-car modes. As such, the location of the site has potential to promote healthier modes of travel.
Vitality of Communities	+	The development of 200 dwellings will support the vitality and vibrancy of Lewes through supporting services, facilities and amenities.
Accessibility	?	The site is located at relative distance (c.1.3km by foot) to the services and facilities located in Lewes town centre. It is also located approximately 2.4km to the railway station. This is recognised by the policy, which seeks to put in place measures to improve access to the site by non-car modes.
Sustainable Transport	?	The site is located at relative distance (c.1.3km by foot) to the services and facilities located in Lewes town centre. It is also located approximately 2.4km to the railway station. This is recognised by the policy, which seeks to put in place measures to improve access to the site by non-car modes.
Housing	+	The site will deliver in the region of c.200 dwellings. The policy states that 50% of these will be affordable. This will contribute to meeting local housing needs.
Climate Change Mitigation	?	In terms of greenhouse gas emissions, road transport is an increasingly significant contributor to emissions locally. The extent to which new development has the potential to support climate change mitigation through facilitating a reduced level of car dependency is therefore a key element. In this context the policy seeks to put in place measures to improve access to the site by non-car modes. The development of 200 dwellings at this location will lead to increases in the built footprint of Lewes, with associated effects on stimulating additional greenhouse gas emissions. However the preamble for the policy seeks to ensure that an on-site renewable energy strategy is required to ensure sustainable zero carbon development is delivered.
Rural Economy	-	Land at the site has been classified as Grade 2 and 3a agricultural land. This is land classified as the Best and Most Versatile Agricultural Land. Development at this location will therefore lead to the loss of this land.

Summary of appraisal

Summary: Policy SD-SS03: Land at Old Malling Farm, Lewes

Whilst the policy for the site will help limit potential effects, the development of a 10 ha greenfield site at this location will lead to inevitable residual effects on landscape quality, the setting of the historic environment and on land classified as the Best and Most Versatile Agricultural Land. Due to the site's location near to a number of designated nature conservation sites, potential negative effects on biodiversity also have the potential to arise.

Development at this location will lead to the sterilisation of Grade 2 and Grade 3a agricultural land. This is land classified as the Best and Most Versatile Agricultural Land.

In terms of positive effects, the policy will deliver housing (including affordable housing) which will help

meet local needs and support the vitality of Lewes.

Potential significant effects?

Whilst the policy seeks to limit potential negative effects, due to the nature and location of the development, impacts on landscape quality and visual amenity are likely to be inevitable and significant.

Significant effects on the Malling Deanery Conservation Area can be avoided if the proposed policy approaches are implemented effectively and green infrastructure and design improvements are realised.

The delivering of 200 houses (of which 50% are affordable) will have a significant contribution to meeting local housing need.

Recommendations

Whilst development at this site has the potential to lead to a number of negative effects, some of which have the potential to be significant, many of these effects are inevitable given the location and scale of the development. In this context the current policy promotes an appropriate range of approaches which will support a limitation of these effects.

Key			
Likely adverse effect	-	Likely positive effect	+
Neutral/no effect		Uncertain effects	?

Policy SD-WW11: Land at Brookland Way, Coldwaltham



Number of allocations: c.20 dwellings

Approximate size of site: c.1 ha

Sustainability Theme	Rating	Commentary
Landscape	?*	<p>The site has been deemed to be of high landscape sensitivity due to the elevation and openness at the northern extent of the site and along the public right of way. The site also has a settlement separation function between Coldwaltham and Watersfield. However the site proposed in this policy is part of the area which has been evaluated to be of medium/high sensitivity due to its proximity to Open Access Land.</p> <p>Whilst the policy seeks to ensure that a Landscape and Visual Impact Assessment is undertaken to inform design and layout and careful consideration is given to the boundary treatment of the site, due to the sensitivity of the site, potential effects on landscape quality may still arise.</p>
Climate Change Adaptation		<p>The site is not located within an area at risk of fluvial, surface water or groundwater flooding.</p>
Biodiversity	?	<p>The site is located within 50m of the Waltham Brooks SSSI, which has been evaluated as being in an 'unfavourable recovering' condition. The site is within the SSSI's Impact Risk Zone for the type of development proposed (the site is within an Impact Risk Zone for '<i>All planning applications outside/extending outside existing settlements/urban areas affecting greenspace, farmland, semi natural habitats or features such as trees, hedges, streams, rural buildings/structures</i>'). The part of the SSSI on the far side of the railway line (approximately 100m distant) has been designated as the Arun Valley SPA and Ramsar site. The Arun Valley SAC is also located slightly further south. The Waltham Brooks has also been designated as a Local Nature Reserve. The site is 3.8km from Duncton to Bignor Escarpment SAC and 2.6km from The Mens SAC</p> <p>As such, allocation of c.20 units at this location raises the possibility of adverse effects on these sites without appropriate avoidance and mitigation measures. The policy approach for the allocation only highlights that an '<i>appropriate ecological survey will be required</i>'. In this</p>

		context there is further scope for additional approaches to be included to ensure that potential effects are avoided in the first instance.
Cultural Heritage		The Grade II listed Widneys, situated on Brook Lane, is located in the vicinity of the site. The building is however well screened from the site, with a number of houses located between.
Cultural Activity		The allocation is unlikely to have significant positive or negative effects relating to sustainable tourism.
Health and Wellbeing		No significant effects at this level of detail.
Vitality of Communities	+	The development of c.20 dwellings will support the vitality and vibrancy of Coldwaltham through supporting services, facilities and amenities.
Accessibility	+	The site is accessible to existing village facilities and amenities, including the school and pub. The site is also, due to its relative proximity to Pulborough, accessible to the range of services, facilities and amenities located in this nearby large village. However, bus links between the two settlements are poor.
Sustainable Transport	?	The site has good accessibility to the school due to its close proximity. However, the site has poor accessibility to the services, facilities and amenities located in Pulborough by bus.
Housing	+	The site will deliver 20 dwellings. This will contribute to meeting local housing needs.
Climate Change Mitigation	?	The development of 20 dwellings at this location will lead to increases in the built footprint of Coldwaltham. However, given the amount of housing proposed for this site it is not anticipated that associated effects on greenhouse gas emissions will be significant.
Rural Economy	+	Through increasing local housing stock, the delivery of housing at this site has the potential to support the village's vitality (although this will be limited by the proposed size of the allocation).

Summary of appraisal

Summary: Policy SD-WW11: Land at Brookland Way, Coldwaltham

The proposed allocation is located within an area of significant ecological sensitivity, with Waltham Brooks SSSI and the Arun Valley SPA and Ramsar site present locally. The proposed approach to the protection of biodiversity assets is unlikely to be sufficient to ensure that potential effects on the nature conservation value of these sites are avoided.

The site is accessible to existing village facilities and amenities, including the school and pub. The site is also, due to its relative proximity to Pulborough, accessible to the range of services, facilities and amenities located in this nearby large village. However, bus links between the two settlements are poor. This has the potential to encourage the use of the private car.

The allocation is unlikely to have significant effects on landscape quality or the historic environment.

Potential significant effects?

Due to the presence of nationally and internationally designated nature conservation sites locally, effects have the potential to be significant if the proposed policy approach to the protection and enhancement of biodiversity value is not made more robust.

Recommendations

There is additional scope for the policy to propose specific approaches which seek to avoid effects on the Waltham Brooks SSSI and the Arun Valley SPA and Ramsar site.

Policy SD-WW10: Land at Petersfield Road, Greatham



Number of allocations: c.30 dwellings

Approximate size of site: c.2.4 ha

Sustainability Theme	Rating	Commentary
Landscape	?	<p>Whilst the site is located on previously developed land, the site has been established as having medium landscape sensitivity due to the size of the site and its location within the centre of the settlement.</p> <p>The proposed policy notes that a Landscape and Visual Impact Assessment will be required and the retention of existing hedgerows and careful consideration is given to the boundary treatment of the site. It also highlights that a Heritage Statement should be prepared. Given the disused glasshouses currently on site development has the scope to enhance landscape character.</p>
Climate Change Adaptation		<p>The site is not located within an area at risk of fluvial, surface water or groundwater flooding.</p>
Biodiversity	?	<p>The site is located approximately 600m from the Wealden Heaths Phase II SPA. The SPA is covered by the Woolmer Forest SSSI and is situated within an SSSI Impact Risk Zone for the types of development proposed (<i>'any residential developments with a total net gain in residential units'</i>). These constraints are acknowledged by the policy, which states <i>'advice from Natural England will be required on appropriate measures to mitigate the impacts of recreational disturbance'</i>.</p> <p>The site is not located adjacent to areas of BAP Priority Habitat.</p> <p>The policy seeks to ensure that new development supports the aims of the Rother Valley Biodiversity Opportunity Area, within which the site is located.</p>

Cultural Heritage	?	The Grade II listed Deal Farmhouse is located on the opposite side of Petersfield Road from the site, and the site is located within an area of archaeological interest. This is recognised by the policy, which seeks to ensure that a Heritage Statement is prepared and a pre-application archaeological assessment is undertaken.
Cultural Activity		No significant effects are anticipated.
Health and Wellbeing		No significant effects are anticipated.
Vitality of Communities	+	The development of c.30 dwellings will support the vitality and vibrancy of Greatham through supporting services, facilities and amenities.
Accessibility	+	The site is accessible to existing village facilities and amenities, including the school, village hall, pub and sports/recreational facilities. The site is also, due to its relative proximity to Liss (c.3km), accessible to the range of services, facilities and amenities located in this nearby larger village and the railway station. However, bus links between the two settlements are limited to a two hourly service during the day.
Sustainable Transport	?	Whilst the site is located close to an existing bus link, this is limited to a two hourly service. The site is located 3km from Liss railway station.
Housing	+	The delivery of approximately 30 dwellings on this site would help contribute towards meeting local demand for housing.
Climate Change Mitigation	-	The development of approximately 30 dwellings at this location will lead to increases in the built footprint of Greatham- however, given the amount of housing proposed for this site it is not anticipated that associated effects on greenhouse gas emissions will be significant.
Rural Economy	+	Through increasing local housing stock, the delivery of housing at this site has the potential to support the village's vitality. The site is located in a Mineral Consultation Area, which is acknowledged through the policy.

Summary of appraisal

Summary: Policy SD-WW10: Land at Petersfield Road, Greatham

The location of the site close to Wealden Heaths Phase II SPA and within the SSSI Impact Risk Zone for the Woolmer Forest SSSI is a significant constraint facing the site. This is recognised the policy, which highlights that consultation with Natural England will be required. Effects on local historic environment assets and archaeology of the site will be limited by the proposed policy approach.

The development of 30 dwellings at the site will help meet local housing needs and support the vitality of the local area. The site is also accessible to village amenities, and relatively accessible to Liss by bus.

The site is located in a Mineral Consultation Area, which is acknowledged through the policy.

Potential significant effects?

Due to the presence of nationally and internationally designated nature conservation sites locally, effects on biodiversity have the potential to be significant if the proposed policy approach to the protection and enhancement of biodiversity value is not effectively implemented.

Recommendations

None proposed.