

DRAFT

Agenda Item 12 Report NPA14/17 Appendix 3

AECOM

Sustainability Appraisal for the South Downs Local Plan

SA Report to accompany
the Pre-Submission version of the Local Plan

Project Number: 60470477

June 2017

DRAFT

Quality information

Prepared by

Nick Chisholm-Batten
Principal Consultant

Checked by

Steve Smith
Technical Director

Approved by

Steve Smith
Technical Director

Revision History

Revision	Revision date	Details	Authorized	Name	Position
V3	30 th June 2017	Draft for client comment	30 th June 2017	Nick Chisholm-Batten	Principal Consultant

Prepared for:

South Downs National Park Authority

Prepared by:

AECOM Infrastructure & Environment UK Limited
3rd Floor
Portwall Place
Portwall Lane
Bristol
BS1 6NA
UK

T: +44 117 901 7000
aecom.com

AECOM Infrastructure & Environment UK Limited (AECOM) has prepared this Report for the sole use of the South Downs National Park Authority ("Client") in accordance with the terms and conditions of appointment (ref no: 60470477) dated March 2014. No other warranty, expressed or implied, is made as to the professional advice included in this Report or any other services provided by AECOM. This Report may not be relied upon by any other party without the prior and express written agreement of AECOM.

Where any conclusions and recommendations contained in this Report are based upon information provided by others, it has been assumed that all relevant information has been provided by those parties and that such information is accurate. Any such information obtained by AECOM has not been independently verified by AECOM, unless otherwise stated in the Report.

© This Report is the copyright of AECOM Infrastructure & Environment UK Limited. Any unauthorised reproduction or usage by any person other than the addressee is strictly prohibited.

Table of Contents

Introduction

1.	Introduction	1
1.1	Background	1
1.2	Context for the Local Plan.....	4
1.3	Current stage of plan making and previous stages	4
1.4	What is the plan seeking to achieve?	5
1.5	Vision and objectives for the plan	6
1.6	Sustainability appraisal explained	7
1.7	This SA Report	8
1.8	SA scoping.....	9

Part 1: What has plan making/SA involved up to this point?

2.	Introduction to Part 1	15
3.	Reasonable alternatives in SA/SEA.....	15
3.1	Appraisal of reasonable alternatives for policy approaches	16
3.2	Appraisal of reasonable alternatives for development strategies.....	18
3.3	Appraisal of options for the Shoreham Cement Works site	45
3.4	Appraisal of alternative approaches to delivering affordable housing.....	53
4.	Development of the planning policies for the South Downs Local Plan.....	57

Part 2: What are the SA findings at this stage?

5.	Appraisal of policy approaches presented in the latest version of the South Downs Local Plan	63
5.1	Purpose of this chapter	63
5.2	Appraisal of policies for Strategic Sites and site allocations	63
5.3	Appraisal of Strategic Policies and Development Management Policies.....	66
5.4	Cumulative effects.....	81

Part 3: What are the next steps?

6.	Next Steps.....	85
6.1	Next steps for plan making / SA process	85

Appendices

Appendix A:	Regulatory requirements
Appendix B:	Summary of context review and baseline data
Appendix C:	Appraisal of development strategy options
Appendix D:	SHLAA methodology
Appendix E:	Site allocation policy appraisal

DRAFT

This page is intentionally blank.

Introduction

1. Introduction

1.1 Background

AECOM has been commissioned to undertake an independent sustainability appraisal (SA) in support of the South Downs National Park Authority's emerging Local Plan.

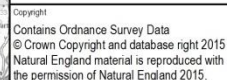
The South Downs National Park Authority (SDNPA) is currently preparing a new Local Plan, which is being developed in the context of the planning documents of the surrounding local authorities in accordance with the statutory Duty to Cooperate. The new Local Plan, which will cover the period to 2033, will be the key planning policy document for the National Park and will guide decisions on the use and development of land. It is currently anticipated that the Local Plan will be submitted to the Secretary of State and then undergo an independent Examination in Public in 2018.

Key information relating to the Local Plan is presented in Table 1.1.

Table 1.1: Key facts relating to the South Downs Local Plan

Name of Responsible Authority	South Downs National Park Authority
Title of Plan	South Downs Local Plan
Subject	Spatial plan
Purpose	The South Downs Local Plan will set out how the SDNPA believes the National Park should evolve and manage development over the next 15 years. The Local Plan contains planning policies designed to help deliver the statutory National Park purposes and duty. It is being developed in the context of the Partnership Management Plan ¹ for the National Park and the planning documents of the surrounding local authorities in accordance with the statutory Duty to Cooperate.
Timescale	2014-2033
Area covered by the plan	South Downs National Park (see Figure 1.1). The local government context relating to the National Park is represented in Figure 1.2.
Summary of content	<p>The South Downs Local Plan will establish the key planning policies for the National Park. These include core, strategic, strategic site allocation and development management policies.</p> <p>The Local Plan will become the statutory development plan for the National Park, along with the minerals and waste plans and 'made' (adopted) neighbourhood development plans</p>
Plan contact point	<p>Sarah Nelson, Strategic Planning Lead, South Downs National Park Authority</p> <p>Email address: sarah.nelson@southdowns.gov.uk</p> <p>Telephone number: 01730 819285</p>

¹ SDNPA (2013) Partnership Management Plan 2014-2019



Purpose of Issue	DRAFT
------------------	-------

**SOUTH DOWNS NATIONAL
PARK AUTHORITY**

Project Title

SUSTAINABILITY APPRAISAL OF
THE SOUTH DOWNS LOCAL PLAN

Drawing Title

SOUTH DOWNS NATIONAL PARK

Drawn SJ	Checked BB	Approved NC	Date 29/07/2015
AECOM Internal Project No. 47069624		Scale @ A3 1:350,000	

THIS DOCUMENT HAS BEEN PREPARED PURSUANT TO AND SUBJECT TO THE TERMS OF AECOM'S APPOINTMENT BY ITS CLIENT. AECOM ACCEPTS NO LIABILITY FOR ANY USE OF THIS DOCUMENT OTHER THAN BY ITS ORIGINAL CLIENT OR FOLLOWING AECOM'S EXPRESS AGREEMENT TO SUCH USE, AND ONLY FOR THE PURPOSES FOR WHICH IT WAS PREPARED AND PROVIDED.

AECOM
Scott House
Alençon Link, Basingstoke
Hampshire, RG21 7PP
Telephone (01256) 310200
Fax (01256) 310201
www.aecom.com



FIGURE 1.1

1.2 Context for the Local Plan

The South Downs Local Plan is being prepared within a distinctive legislative, administrative and planning policy context.

The South Downs was established as a National Park in 2010 and was designated in recognition of its landscapes of exceptional beauty and importance. It contains over 1,600km² of England's most iconic lowland landscapes stretching from Winchester in the west to Eastbourne in the east.

The South Downs National Park Authority (SDNPA) became the Local Planning Authority on 1 April 2011. National Park Authorities are independent authorities operating within the local government framework. They have two statutory purposes set out in the Environment Act 1995:

Purpose 1: To conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and

Purpose 2: To promote opportunities for the understanding and enjoyment of the special qualities of National Parks by the public.

The NPA also has a duty when carrying out the purposes:

- To seek to foster the economic and social well-being of the local communities within the National Park

In addition, Section 62 of the Environment Act 1995 requires all relevant authorities, including statutory undertakers and other public bodies, to have regard to these Purposes. Where there is an irreconcilable conflict between the statutory Purposes, the Sandford² Principle is statutorily required to be applied and the first Purpose of the National Park will be given priority.

1.3 Current stage of plan making and previous stages

This SA Report accompanies the current consultation on the Local Plan (*South Downs Local Plan Pre-Submission*). The Pre-Submission Local Plan is being consulted on under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations.

Plan-making for the SDLP has been underway since 2013. In February 2014, a Local Plan *Options Consultation Document*³ was released for consultation for a period of eight weeks. Representing the outcome of the first stage in the Local Plan's preparation process, the purpose of the consultation was to gain views on potential policy approaches that the Local Plan could take on key planning issues. The *Options Consultation Document* was accompanied by an Options SA Report⁴ which was produced with the intention of informing this early stage of the plan's preparation.

Subsequently, the Preferred Options for the Local Plan were developed, and the *South Downs Local Plan: Preferred Options* document was released for consultation in September 2015. The drafting of the Preferred Options took into account consultation responses received on the *Options Consultation Document* and the accompanying Options SA Report, the findings of further baseline studies undertaken in the National Park and the ongoing inputs from the SA process.

² The Sandford Principle – a statement first made by Lord Sandford in his committees report on possible changes to the management and legislation governing National Parks and now in the Environment Act 1995 which states that: 'if it appears that there is a conflict between those two Purposes, any relevant Authority shall attach greater weight to the first [Purpose]'.

³ South Downs National Park Authority (February 2014) South Downs National Park- Local Plan Options Consultation Document

⁴ URS/AECOM (February 2014) Sustainability Appraisal for the South Downs Local Plan- Findings of the SA of Issues and Options

DRAFT

1.4 What is the plan seeking to achieve?

The Local Plan, when adopted, will set out how the SDNPA will manage development over the 15 years to 2033. It will include a vision, objectives and several sets of policies which together provide a policy framework for assessing planning applications and guiding development in the National Park. It will also provide the framework for the preparation of Neighbourhood Plans for areas within the National Park.

The Local Plan will provide a single reference point for planning policies within the National Park and set out how the two statutory purposes and the duty, the vision of the National Park and the South Downs National Park Partnership Management Plan's objectives and policies will be delivered 'on the ground' through planning decisions. It will do so through being in general conformity with the National Planning Policy Framework (NPPF) and the policy guidance set out in the Defra English National Parks and the Broads UK Government Vision and Circular 2010 as referred to in paragraph 14 and footnote 9 of the NPPF. Foremost in the development of the Local Plan to date has been the SDNPA's statutory purposes and its duty, as specified in the Environment Act 1995, and set out above.

The Defra National Parks Vision and Circular and the NPPF provides the policy context for sustainable development in National Parks. The former states that National Parks are not suitable locations for unrestricted housing development but that National Park Authorities (NPAs) have an important role to play as planning authorities in the delivery of affordable housing. The expectation is that new housing will be focused on meeting affordable housing requirements and that NPAs should work with local housing authorities and others to ensure that the needs of local communities are met and affordable housing remains so in the longer term. The NPPF states that great weight should be given to conserving landscape and scenic beauty in National Parks which have the highest status of protection in relation to landscape and natural beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas and should be given great weight in National Parks.

The landscapes of the South Downs provide many services– ecosystems services. Both the South Downs Local Plan and the Partnership Management Plan that provides its context are based on an ecosystem services approach that acknowledges the direct and indirect contribution of the environment. It is seen by the SDNPA as a powerful tool for planning the sustainable development of the National Park that is located in the heavily populated South East of England and is thus under extreme pressures from many types of development. For this reason a landscape-led approach to the formulation of its Local Plan is being taken that seeks to ensure that any proposed development will not detract from the landscape for which it was designated.

DRAFT

1.5 Vision and objectives for the plan

The 2050 Vision for the South Downs is set out in the National Park Partnership Management Plan (2013). It also provides the Vision for the Local Plan.

Box 1.1: Vision for the South Downs National Park

By 2050 in the South Downs National Park:

The iconic English lowland landscapes and heritage will have been conserved and greatly enhanced. These inspirational and distinctive places, where people live, work, farm and relax, are adapting well to the impacts of climate change and other pressures.

People will understand, value, and look after the vital natural services that the National Park provides. Large areas of high-quality and well-managed habitat will form a network supporting wildlife throughout the landscape.

Opportunities will exist for everyone to discover, enjoy, understand and value the National Park and its special qualities. The relationship between people and landscape will enhance their lives and inspire them to become actively involved in caring for it and using its resources more responsibly.

Its special qualities will underpin the economic and social wellbeing of the communities in and around it, which will be more self-sustaining and empowered to shape their own future. Its villages and market towns will be thriving centres for residents, visitors and businesses and supporting the wider rural community.

Successful farming, forestry, tourism and other business activities within the National Park will actively contribute to, and derive economic benefit from, its unique identity and special qualities.

A number of strategic objectives outline the direction that the Local Plan will take in order to help deliver the vision for 2050. These objectives seek to deliver the vision within the remit of the Local Plan and through the consideration of individual planning applications.

Box 2.2: Local Plan Objectives

Objectives to meet the National Park Vision

1. To conserve and enhance the landscapes of the National Park.
2. To conserve and enhance the cultural heritage of the National Park.
3. To conserve and enhance large areas of high-quality and well-managed habitat to form a network supporting wildlife throughout the landscape.
4. To achieve a sustainable use of ecosystem services³ thus enhancing natural capital across the landscapes of the National Park and contributing to wealth and human health and wellbeing.
5. To protect and provide opportunities for everyone to discover, enjoy, understand and value the National Park and its special qualities.
6. To adapt well to and mitigate against the impacts of climate change and other pressures.
7. To conserve and enhance the villages and market towns of the National Park as thriving centres for residents, visitors and businesses.
8. To protect and provide for the social and economic wellbeing of National Park communities supporting local jobs, affordable homes and local facilities.
9. To protect and provide for local businesses including farming, forestry and tourism that are broadly compatible with and relate to the landscapes and special qualities of the National Park.

It is intended that the core, strategic, allocation and development management policies of the Local Plan will deliver these objectives. The current (Pre-Submission) policies of the Local Plan have been appraised in Part 2 of this SA Report.

1.6 Sustainability appraisal explained

SA considers and communicates the likely significant effects of an emerging plan, and the *reasonable alternatives* considered during the plan making process, in terms of key sustainability issues. The aim of SA is to inform and influence the plan-making process with a view to avoiding or mitigating negative effects and maximising positive effects. Through this approach, the SA seeks to maximise the emerging Local Plan's contribution to sustainable development.

An SA is undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transpose into national law European Union Directive 2001/42/EC 'on the assessment of the effects of certain plans and programmes on the environment'. SA widens the scope of the assessment to explicitly include social and economic issues.

The SEA Regulations require that an environmental report is published for consultation alongside the draft plan that '*identifies, describes and evaluates*' the *likely significant effects of implementing 'the plan, and reasonable alternatives'*. The environmental report must then be taken into account, alongside consultation responses, when finalising the plan. This SA Report serves that purpose.

The 'likely significant effects on the environment' include those indicated in Annex I of the SEA Directive as '*including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors*'. Reasonable alternatives to the plan need to take into consideration the objectives of the plan and its geographic scope. The choice of reasonable alternatives is determined on the basis of a case-by-case assessment.⁵

In line with the SEA Regulations, this SA Report must answer the three questions:

- **What has plan-making / SA involved up to this point?**
 - Including with regards to the consideration of 'reasonable alternatives'.
- **What are the appraisal findings at this current stage?**
 - i.e. in relation to the policies currently proposed for the Local Plan, as presented in the current *South Downs Local Plan Pre-Submission* document.
- **What happens next?**
 - What are the next steps for plan making?

These questions are derived from Schedule 2 of the SEA Regulations, which set out 'the information to be provided within the [environmental] report'.

Appendix A provides further explanation of the regulatory basis for answering certain questions within the SA Report, and a 'checklist' explaining more precisely where in this SA Report certain regulatory reporting requirements are met.

⁵ Commission of the European Communities (2009) Report from the Commission to the Council, The European Parliament, The European Economic and Social Committee and the Committee of the Regions on the application and effectiveness of the Directive on Strategic Environmental Assessment (Directive 2001/42/EC). (COMM 2009 469 final).

1.7 This SA Report

At the current stage of plan-making, the SDNPA is consulting on the Local Plan (*South Downs Local Plan Pre-Submission*). This SA Report is produced with the intention of informing the consultation.

This SA Report has been structured in three parts according to the three questions listed above. More specifically, the SA Report presents information for the following elements of the SA process undertaken to date:

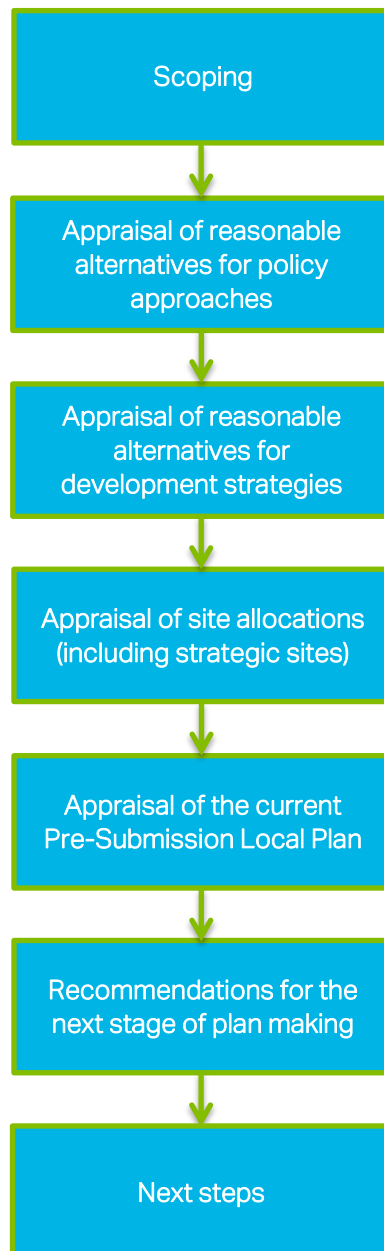


Figure 1.3 Information presented in this SA Report

1.8 SA scoping

The SEA Regulations require that: *'When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies'*. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.⁶ These authorities were consulted on the scope of the Local Plan SA in autumn 2013.

The Scoping Report presented the following elements:

Context review and baseline data

An important step when seeking to establish the appropriate scope of an SA involves reviewing the sustainability context from key policies, plans and programmes. From the SEA Regulations it is understood that there is a need to identify key international, regional and local objectives and issues.

The Scoping Report also included a detailed baseline review which aids understanding of the current and likely future situation in the plan area and therefore the identification and evaluation of 'likely significant effects' associated with the emerging plan and reasonable alternatives.

The context review and baseline information initially included in the SA Scoping Report (autumn 2013) was updated following the receipt of consultation responses and provides a key part of the information base for the appraisal. **Appendix B** presents a summary of the updated context review and the baseline data, as well as key sustainability issues for the National Park.

SA Framework

Drawing on the review of the sustainability context and baseline, the SA Scoping Report identified a range of sustainability problems / issues that should be a particular focus of the SA, ensuring that it deals with the most important sustainability issues. These issues were then translated into an SA 'framework' of objectives and appraisal questions.

The SA Framework provides a benchmark or yardstick against which the sustainability effects of the Local Plan and alternatives can be identified and evaluated based on a structured and consistent basis. In this context, the objectives and appraisal questions which comprise the SA Framework provide a methodological framework for the appraisal of likely significant effects on the baseline.

The SA Framework and the appraisal findings in this SA Report have been presented under nine 'SA themes', reflecting the range of information being considered through the SA process. These are:

- Landscape;
- Climate Change Adaptation;
- Biodiversity;
- Cultural Heritage;
- Cultural Activity;
- Health and Wellbeing;
- Vitality of Communities;
- Accessibility;
- Sustainable Transport;
- Housing;
- Climate Change Mitigation; and
- Local Economy.

⁶ In line with Article 6(3) of the SEA Directive, these consultation bodies were selected because *'by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programme'*.

DRAFT

Table 1.2: SA Framework for the South Downs Local Plan

No	SA theme	SDLP SA objective	SA sub-objectives	Questions used to assess proposed policy
1	Landscape	To conserve and enhance landscape character.	1.1: Provide resilience to the landscape character in response to climate change.	
			1.2 Extend the area of dark night skies and the assessed tranquillity of the National Park.	Are the policies in the local plan supporting this objective?
			1.3 Seek to meet the 'Broad Management Objective and Landscape Guidelines' set out in the South Downs Integrated Landscape Character Assessment.	Are the Broad Management Objective and Landscape Guidelines set out in the SDILCA being achieved by the local plan?
2	Climate Change Adaptation	To ensure the SDNP communities are prepared for the impacts of climate change.	2.1: Minimise the risk of flooding to new development through application of the sequential and exception tests.	Is the LP directing development away from areas at risk of flooding?
			2.2: Promote the uptake of sustainable drainage systems.	
			2.3: The achievement of integrated coastal zone management	Is the planning of coastal land within the SDNP being considered by all interest parties in terms of an ecosystems services approach?
			2.4: Address both water resource and demand issues in the context of National Park purposes in partnership with water companies.	Is consumption reducing and are leakage rates being reduced?
3	Biodiversity	To conserve and enhance the region's biodiversity.	3.1: Maintain a functioning ecological network and improve the resilience of natural systems, flora, fauna, soils and semi-natural habitat.	Are biodiversity indicators in response to Partnership Management Plan and SDLP policies improving?
			3.2: Conserve, enhance, restore, expand and reconnect areas of priority habitat ('Bigger, better, more and joined').	
4	Cultural Heritage	Conserve and enhance the historic environment, heritage assets and their settings.	4.1: Achieve repair and / or enhancement of heritage assets currently identified as "at risk" to the extent that this status no longer applies.	Are local plan policies contributing to a reduction in the assessed heritage at risk?
			4.2: Help the HE adapt to changing conditions arising from CC (warmer, wetter, infestations etc.)	

DRAFT

No	SA theme	SDLP SA objective	SA sub-objectives	Questions used to assess proposed policy
5	Cultural Activity	To encourage increased engagement in cultural activity across all sections of the community in the SDNP and promote sustainable tourism	5.1: A sustainable tourism strategy that supports recreation businesses.	
6	Health and Wellbeing	To improve the health and well-being of the population and reduce inequalities in health and well-being.	6.1: Optimise the benefits that the natural environment offers to contribute to the health and well-being of both residents of the National Park and visitors to the SDNP.	How are the PMP & LP policies contributing to improve the facilities for recreation and health and well-being to visitors to the SDNP?
			6.2: Use environmental and building standards to ensure that places promote health and wellbeing.	Is the health and well-being of residents in the National Park improving?
			6.3: To contribute to a reduction in all aspects of rural crime through effective enforcement in partnership with other enforcement agencies.	
7	Vitality of Communities	To create and sustain vibrant communities which recognise the needs and contributions of all individuals.	7.1: Supporting communities where children grow up and go to school.	Is the LP delivering communities with a balanced demographic?
			7.2: Supporting and empowering local communities to shape their own community (recognising the value of community and neighbourhood planning).	Is the LP supporting the aspirations of communities to produce Neighbourhood Development Plans?
			7.3: Support schemes aimed at extending involvement of all members of society in the SDNP.	How well is the PMP progressing initiatives in support of this objective?
8	Accessibility	To improve accessibility to all services and facilities.	8.1: Encourage the development of appropriate services and facilities in development schemes, based upon local plan evidence, via community rights tools, CIL and direct developer contributions (S106).	Have the LP policies improved access to services and facilities?

DRAFT

No	SA theme	SDLP SA objective	SA sub-objectives	Questions used to assess proposed policy
9	Sustainable Transport	To improve the efficiency of transport networks by enhancing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel.	9.1: Provide sustainable access to services	
			9.2: Work with other partners to develop a high quality, safe access network and better links between bus and trains and cycling opportunities.	Will the policy support the development or use of public transport, cycling or walking?
			9.3: Minimising the impact of vehicle infrastructure on landscape and communities.	Is road traffic reducing?
			9.4: A sustainable transport infrastructure for 2020 and beyond.	Is there behaviour change in terms of a modal shift from car-use to public transport?
10	Housing	To ensure that everyone has the opportunity to live in a good quality, affordable home, suitable to their need and which optimises the scope for environmental sustainability	10.1: Support rural communities by providing affordable housing for local people which meets the needs of communities now and in the future.	Does the policy provide a range of housing including at least 40% within the affordable range?
				Does the policy provide new housing for local need?
			10.2: Create communities characterised by integrated development which takes account of local housing needs and delivers the widest possible range of benefits consistent with National Park purposes & duty.	How have LP polies supported delivery of benefits to local communities?
			10.3: To make suitable provision for transit and permanent traveller sites based upon projected need.	Is the LP providing for G&T Accommodation?
			10.4: Make appropriate provision for the accommodation needs of older generations.	Is the LP meeting the needs of older generations?

DRAFT

No	SA theme	SDLP SA objective	SA sub-objectives	Questions used to assess proposed policy
11	Climate Change Mitigation	To address the causes of climate change through reducing emissions of greenhouse gases and the consequences through adaptation measures.	11.1: Promote appropriate retrofitting and upgrading of the existing housing stock and other buildings informed by the sense of place	Are energy efficiency measures in the domestic sector being actively pursued to reduce carbon emissions?
			11.2: Implement policy of zero carbon new build homes by 2016 in accordance with government policy.	
			11.3: Supporting communities with the right low carbon / renewable infrastructure in the right place.	Are community energy initiatives being encouraged by the LP?
			11.4: Extension of wood planting, where appropriate both for carbon storage opportunities and to provide woodfuel sources.	
12	Local Economy	To encourage development of the rural economy in a manner that balances agricultural and other business interests to maintain a living, valued landscape.	12.1: Encourage development of appropriate infrastructure throughout the area to encourage small business, communities & tourism in the Park.	Are infrastructure deficiencies being addressed to support rural businesses?
			12.2: Encourage local industry and maintenance of a living cultural skills base that forms part of heritage now and into the future.	Is the rural economy growing in the SDNP?
			12.3: Recognise and support core sectors of the South Downs economy such as food production, tourism and land management.	
			12.4: Promote agri-environmental businesses and diversification that focuses on ecosystem services and enhancement of the local supply chain.	
			12.5: Market towns to provide services to the rural hinterland.	

Part 1:
**What has plan making / SA
involved up to this point?**

2. Introduction to Part 1

Preparation of the South Downs Local Plan began in 2013. In February 2014, a SDLP Options Consultation Document⁷ was released for consultation for a period of eight weeks. Representing the outcome of the first stage in the SDLP's preparation process, the purpose of the consultation was to gain views on potential policy approaches that the Local Plan could take on key planning issues. The Options Consultation Document was accompanied by an Options SA Report⁸ which was produced with the intention of informing this early stage of the plan's preparation.

Subsequently, the Preferred Options for the SDLP were developed and released for consultation in September 2015. The drafting of the Preferred Options took into account consultation responses received on the Options Consultation Document and the accompanying Options SA Report, the findings of further baseline studies undertaken in the National Park and the ongoing inputs from the SA process.

The aim of Part 1 of this SA Report is not to recount the entire plan-making process to date but, rather, to explain how work was undertaken to develop and then appraise reasonable alternatives in 2015 and 2016. It also seeks to explain how the Council has taken into account the findings of the appraisal of reasonable alternatives when finalising the *South Downs Local Plan Pre-Submission*. Presenting this information is important given regulatory requirements.⁹

3. Reasonable alternatives in SA/SEA

A key element of the SA process is the appraisal of 'reasonable alternatives' for the Local Plan. The SEA Regulations¹⁰ are not prescriptive as to what constitutes a reasonable alternative, stating only that the SA Report should present an appraisal of the '*plan and reasonable alternatives taking into account the objectives and geographical scope of the plan*'.

The following chapters therefore describe how the SA process to date has informed proposed planning policies for the National Park, the preferred spatial strategy and potential locations for development. Specifically, this chapter explains how the Local Plan's planning policies have been developed in relation to the SA process and how spatial strategy has been developed in terms of housing numbers and distribution.

In this context, a number of reasonable alternatives have been considered in relation to the following four broad areas:

- policy approaches for the Local Plan;
- development strategies for the Local Plan;
- options for the Shoreham Cement Works site; and
- approaches to delivering affordable housing through the Local Plan.

⁷ South Downs National Park Authority (February 2014) South Downs National Park- Local Plan Options Consultation Document

⁸ URS/AECOM (February 2014) Sustainability Appraisal for the South Downs Local Plan- Findings of the SA of Issues and Options

⁹ There is a requirement for the SA Report to present an appraisal of 'reasonable alternatives' and 'an outline of the reasons for selecting the alternatives dealt with'.

¹⁰ Environmental Assessment of Plans and Programmes Regulations 2004

DRAFT

3.1 Appraisal of reasonable alternatives for policy approaches

The *Options Consultation Document* presented a discussion of 55 'issues' for focus at that stage in plan development. These were discussed under eight themes. The issues, and the themes under which they were grouped, were as follows:

Table 3.1: Issues considered in the Options Consultation Document

Theme	Issue
Landscape and Natural Resources	Issue 1 – How can the Local Plan best help conserve and enhance landscape character?
	Issue 2 – How can the Local Plan provide resilience for people, businesses and their environment?
	Issue 3 – How can the Local Plan best ensure designated habitats and protected species are conserved and enhanced?
	Issue 4 – How can the Local Plan best ensure that geodiversity is conserved and enhanced?
	Issue 5 – How can the Local Plan best address issues of water resources, water quality and flooding?
	Issue 6 – How can the Local Plan adequately protect, manage and enhance trees and woodland?
Historic Environment	Issue 7 – What approach should the Local Plan adopt to heritage at risk?
	Issue 8 – What approach should the Local Plan adopt in relation to adaptation and new uses of historic buildings and places which have lost their original purpose?
	Issue 9 – What approach should the Local Plan adopt to ensure the diversification of the agricultural economy conserves and enhances historic farm buildings and their setting?
	Issue 10 – How might climate change impact upon the historic environment? To what extent should individual heritage assets be expected to contribute to climate change solutions?
	Issue 11 – How might the Local Plan best protect non-designated heritage assets from total loss or incremental change?
	Issue 12 – Should the Local Plan include a policy on enabling development to address heritage at risk issues?
Design	Issue 13 – How might new infrastructure projects affect the cultural heritage?
	Issue 14 – How should the Local Plan ensure the design of new development supports built environment character and conserves and enhances the National Park's natural beauty, wildlife and cultural heritage?
	Issue 15 – How should the Local Plan best ensure the use of appropriate local materials?
	Issue 16 – How can the Local Plan encourage the creation of buildings and developments that are adaptable and flexible over time?
	Issue 17 – Should the local plan include minimum space standards for new residential development?
	Issue 18 – How can the Local Plan best ensure that the design of streets and roads reduce vehicle dominance and speeds, enhance local distinctiveness and minimise signage clutter and light pollution?
	Issue 19 – How can the Local Plan best provide for sustainable new development which minimises greenhouse gas emissions and reinforces the resilience to climate change impacts?
	Issue 20 – How can the Local Plan address carbon reduction targets through energy efficiency schemes?
Settlement Strategy	Issue 21 – What development should the Local Plan permit outside settlements?
	Issue 22 – What approach should the Local Plan adopt to development in Tier 5 settlements?
	Issue 23 – What approach should the Local Plan adopt to development in Tier 4 settlements?
	Issue 24 – What approach should the Local Plan adopt to development in Tier 3 settlements?

DRAFT

Theme	Issue
Housing	Issue 25 – What approach should the Local Plan adopt to development in Tier 2 settlements?
	Issue 26 – What approach should the Local Plan adopt to development in Tier 1 settlements?
	Issue 27 – How should the Local Plan best take account of the adjoining settlements outside of the National Park?
	Issue 28 – What approach should the Local Plan adopt for development proposals on sites adjoining settlements outside the National Park?
	Issue 29 – What approach should the Local Plan adopt to the redevelopment of major brownfield sites?
	Issue 30 – How best should the Local Plan ensure a ‘sufficient’ supply of housing?
	Issue 31 – How best should the Local Plan address housing mix in the National Park?
	Issue 32 – What approach should the Local Plan adopt to best meet local need?
	Issue 33 – What approach should the Local Plan adopt for rural exception sites?
	Issue 34 – How best should the Local Plan meet the housing needs of agricultural and forestry workers?
Economy and Tourism	Issue 35 – How best can the Local Plan ensure the housing needs of older people are met?
	Issue 36 – How best should the Local Plan ensure that the housing needs of Gypsies, Travellers and Travelling Show-people are met?
	Issue 37 – How best should the Local Plan encourage Community Land Trusts?
	Issue 38 – Identifying strategic goals for the economy.
	Issue 39 – Should we safeguard existing employment sites?
	Issue 40 – What approach should we take to the allocation of additional employment land?
	Issue 41 – How can we support new businesses, small local enterprises and the rural economy?
	Issue 42 – What approach should the Local Plan take to the diversification of agricultural land and buildings?
	Issue 43 – What approach should the Local Plan take to equine development?
	Issue 44 – How should the Local Plan consider visitor accommodation?
Community Facilities and Infrastructure	Issue 45 – How should the Local Plan consider types of tourism developments and recreational activities?
	Issue 46 – What approach should the Local Plan take to static holiday caravan sites?
	Issue 47 – How best can the Local Plan ensure communities have access to local services?
	Issue 48 – How best can the Local Plan resist the loss of community infrastructure?
	Issue 49 – How best can the Local Plan ensure adequate infrastructure provision for new development?
	Issue 50 – How best might the Local Plan address statutory requirements to support carbon reduction targets through low carbon / renewable energy schemes?
Transport and Accessibility	Issue 51 – Expenditure of Community Infrastructure Levy.
	Issue 52 – How best should the Local Plan deal with proposals for strategic infrastructure?
	Issue 53 – How best should the Local Plan protect existing routes for use as sustainable transport routes?
	Issue 54 – What should be the Local Plan’s approach to car parking?
	Issue 55 – How best can the Local Plan ensure new developments are accessible?

For each of the above issues, the *Options Consultation Document* proposed various broad alternative approaches for consideration and discussion. The aim of the options consultation was to gain stakeholders’ views on different approaches that SDLP policies could take on various key planning issues.

The *Options Consultation Document* was accompanied by the Options SA Report. The Options SA Report presented an appraisal of the various high-level approaches presented within the *Options Consultation*

DRAFT

Document. This was for the benefit of those who might wish to make representations through the options consultation and for the benefit of the plan-makers tasked with selecting preferred approaches to the SDLP. Through this approach the SA appraised reasonable alternatives for a range of potential policy approaches for the SDLP.

The *Options Consultation Document*, and accompanying Options SA Report presenting the appraisal of the reasonable alternatives for policy issues, can be accessed at:

<https://consult.southdowns.gov.uk/consult.ti/localplanoptions/consultationHome>

3.2 Appraisal of reasonable alternatives for development strategies

3.2.1 Alternative development strategies considered

A key element of the Local Plan's development process to date has been to consider different approaches to delivering housing in the National Park. This has been considered in the context of enabling the National Park to address local need insofar as possible and appropriate, whilst conserving and enhancing the special qualities of the National Park and delivering the Purposes and Duty of the National Park Authority (Section 1.2 of this report).

A central element of the Options Consultation stage and the accompanying SA process was to inform the development of spatial options for the SDLP to allow coherent development strategies to emerge.

To help support this process, during the first part of 2015 (and prior to the Preferred Options stage), the SA considered a number of development strategy options as reasonable alternatives. This reflects the Planning Inspectorate's recommendation that "*Meaningful options should be developed on such matters as the broad location and balance of development across the authority area, the management of the housing supply, the balance between employment and housing and the delivery of affordable housing.*"¹¹

These development strategy options were generated with the aim of testing different growth scenarios that emerged from the Strategic Housing Market Assessment (SHMA) and from land supply availability as set out in the Strategic Housing Land Availability Assessment (SHLAA), both of which were specifically commissioned to inform the Local Plan. The growth scenarios considered in 2015 are set out in **Table 3.2** and **3.3** below. The homes per annum figures in the second column of **Table 3.3** incorporate figures for unimplemented planning permissions of 1,253 homes and a projected windfall allowance over the plan period of 765 homes, which was the current status when the appraisal of these options was undertaken in 2015.

¹¹ The Planning Inspectorate (2007). Local Development Frameworks: Lessons Learnt Examining Development Plan Documents

DRAFT

Table 3.2: Growth Scenarios and relationship to allocations

	<i>Growth Scenario (number of homes allocated)</i>	<i>Unimplemented Planning Permissions</i>	<i>Windfall Allowance</i>	<i>Total</i>	<i>Per annum</i>
<i>Low</i>	1,720	1,253	765	3,738	208
<i>Medium</i>	2,578	1,253	765	4,596	255
Medium + 60%	3,429	1,253	765	5,447	303
<i>High</i>	6,087	1,253	765	8,105	450

Table 3.3: Growth scenarios considered for the Local Plan

Low	208 homes per annum	The low growth scenario of 208 homes per annum is the minimum number of homes to be provided in the National Park in order to maintain the size of the current population as set out in the SHMA. This is based on seeking to maintain the current population and the blended approach to modelling household formation rates utilised in the SHMA. It should be noted that this allows some net in-migration without which the population of the National Park would fall notably and thus undermine the viability of local services.
Medium	255 homes per annum	The medium growth scenario of 255 homes per annum reflects the historic delivery rate of 259 homes built each year between 2004 and 2014 in the area now covered by the National Park before and after designation.
Medium + 60%	303 homes per annum	The medium + 60% growth scenario of 302 homes per annum takes forward the requirements set out for settlements in adopted and emerging joint core strategies (JCSs), namely Winchester, East Hampshire and Lewes, which were themselves subject to an SA process. For those settlements outside these plan areas it applied a 60% uplift. The resulting figure of 302 provides a useful stepping stone between the medium and high growth scenarios.
High	450 homes per annum	The high growth scenario of 450 homes per annum relates to projecting forward population growth based on five year trends as set out in the SHMA

In view of the high level of constraints and limited scope for development in the National Park, particularly outside of existing settlement boundaries, consideration of where development might be located has been based upon an assessment of the site availability evidence in conjunction with National Park-wide spatial approaches. The Options Consultation for the Local Plan undertaken in early 2014 considered spatial development options in the very generic terms of how development should be distributed across a rigid settlement hierarchy. Feedback received from the consultation indicated that a less rigid approach was preferred that did not exclude development in smaller settlements but rather sought to maintain the viability of these settlements by allowing small levels of growth. There was, however, a body of opinion that recognised the benefits of focusing housing development alongside existing services, existing employment and proposed employment sites.

DRAFT

Taking into consideration the growth scenarios and the spatial approaches, the SDNPA initially explored the following development strategies in Table 3.4. The allocation for each growth scenario excludes the unimplemented planning permissions and projected windfall allowance (see Table 3.2).

Table 3.4: Alternative development strategies considered for the Local Plan

<i>Growth Scenario (number of homes allocated over plan period)</i>	<i>Dispersed (Allocations to a wide range of settlements across the South Downs National Park)</i>	<i>Concentrated (Housing restricted to the following settlements: Petersfield, Lewes, Midhurst, Liss and Petworth)</i>
Low (1,720)	Dispersed Low	Concentrated Low
Medium (2,578)	Dispersed Medium	Concentrated Medium
	Dispersed Medium – Sustainable Transport	
Medium +60% (3,429)	Dispersed Medium +60%	Concentrated Medium +60%
High (6,087)	Dispersed High	Concentrated High

The four development strategies highlighted in the table 3.4 were discounted from further testing as they were not considered to be reasonable alternatives for the following reasons:

- The pursuit of a **Dispersed Low** strategy was viewed to be inconsistent with the National Park Duty because three of the core settlements have received allocations through existing Joint Core Strategies. These allocations account for 81% of the overall housing delivery figure, specifically in Petersfield, Liss and Lewes. Given this constraint, it would have left only 160 homes to distribute among the remaining 35 settlements considered (see Table 3.5 below). This would not have provided sufficient housing for a large number of these settlements to sustain growth or meet affordable housing needs.
- For similar reasons to the above, a **Concentrated Low** strategy is not a reasonable alternative as it would offer no housing to 35 settlements to sustain growth or meet affordable housing needs.
- Under the **Concentrated Medium + 60% growth strategy**, it was apparent that seeking to accommodate significantly higher levels of development exclusively in Petersfield, Lewes, Midhurst, Liss and Petworth would conflict with recent evidence including the East Hampshire Core Strategy Sustainability Appraisal. This tested a range of scenarios including some which directed higher levels of growth to Petersfield and Liss, and the SDNPA SHLAA. These highlighted that such an approach would lead to significant negative landscape impacts on the nationally designated landscape of the South Downs.
- For the **Concentrated High** strategy, it follows that if the concentrated Medium + 60% strategy would clearly lead to significant negative effects on the landscape, to test an even greater concentration of housing would not be a reasonable alternative.

DRAFT

The remaining five development strategy options were therefore considered reasonable and subject to further testing:

1. Dispersed High
2. Dispersed Medium +60%
3. Concentrated Medium
4. Dispersed Medium
5. Dispersed Medium (Sustainable Transport)

While Options 1 to 4 are straightforward and explained at the head of Table 7.4, Option 5, Dispersed Medium – Sustainable Transport merits further explanation. The sustainable transport option would help underpin Policies 37 and 38 of the Partnership Management Plan by locating new development in areas with established sustainable transport infrastructure, specifically well-established bus routes, rail and cycle routes suitable for commuting:

- SD 18.1: *New development should be located and designed to reduce the need to travel. Development proposals that are likely to generate a significant number of vehicle movements will be required to be located near existing centres and supportive infrastructure, including main roads.*
- Policy 37: *Encourage cycling for both commuting and leisure purposes through the development and promotion of a seamless and safer network and by protecting the potential opportunities for future off road cycling infrastructure.*
- Policy 38: Work in partnership with key partners, business and organisations to reduce car travel across the National Park.

In this context, the Dispersed Medium Sustainable Transport option essentially explored whether the Dispersed Medium option could be pursued giving priority to allocations in settlements with good access to sustainable transport infrastructure.

The evidence to support this consideration comprised:

1. The known existence of a Monday-Friday bus service passing through the settlement;
2. Accessibility mapping modelled from the Department for Transport Public Transport “Stops and Services Database” and used to inform the sustainable transport policy; and
3. Rail network – locations within two miles of a station.

Initially settlements were identified if any of the above applied. It was, however, recognised that 1) above does not necessarily imply suitability for commuting or school travel. As such, settlements were excluded on the basis of 2) above where the total journey time to a major settlement was more than 30 minutes, unless the settlement also fell within 3). Furthermore, it is recognised that the widespread subsidy of rural bus services, in a climate of reduced public-spending, introduces uncertainty over the future provision of these services.

Hypothetical housing figures for the five options have been presented in Table 3.5, which are represented in the maps which follow the table. These are presented by settlement (and in some cases including strategic sites) which have been earmarked for allocating sites in order to allow this testing to take place. **It is stressed that this was undertaken solely for the purposes of testing reasonable alternatives for the Local Plan and is not indicative of any change to proposed allocations.**

DRAFT

Table 3.5 Settlements and hypothetical quantum of development allocated to each settlement (total over plan period) under each development strategy option

Settlement	Option 1: Dispersed High	Option 2: Dispersed Medium +60%	Option 3: Concentrated Medium	Option 4: Dispersed Medium	Option 5: Dispersed Medium - Sustainable Transport
Alfriston	24	10	0	6	11
Amberley	24	10	0	6	20
Binsted	48	19	0	12	0
Buriton	28	11	0	7	11
Bury	24	10	0	6	11
Chawton	24	10	0	6	16
Cheriton	24	10	0	6	0
Coldwaltham	80	32	0	20	0
Compton	24	10	0	6	0
Ditchling	60	24	0	15	0
Droxford	44	18	0	11	0
Easebourne (ES)	80	32	0	20	20
East Dean and Friston	44	18	0	11	11
East Meon	60	24	0	15	15
Falmer	0	0	0	0	30
Fernhurst (not incl. Syngenta)	44	18	0	11	30
Syngenta (strategic site)	200	200	0	200	0
Finchdean	0	0	0	0	20
Findon	80	32	0	20	20
Fittleworth	24	10	0	6	0
Glynde	0	0	0	0	14
Greatham	120	48	0	30	30
Hambleton	24	10	0	6	0
Itchen Abbas	32	13	0	8	8
Kingston Near Lewes	44	18	0	11	11
Lavant (incl. Mid Lavant, East Lavant)	80	32	0	20	45
Lewes (not in NSQ)	1677	672	626	420	485
North Street Quarter	415	415	415	415	415
Liss (incl. West Liss and Liss Forest)	220	220	220	150	220
Meonstoke and Corhampton	44	18	0	11	0

DRAFT

Settlement	Option 1: Dispersed High	Option 2: Dispersed Medium +60%	Option 3: Concentrated Medium	Option 4: Dispersed Medium	Option 5: Dispersed Medium - Sustainable Transport
Midhurst	599	240	264	150	85
Northchapel	24	10	0	6	0
Petersfield	805	805	805	700	820
Petworth	599	240	248	150	85
Pyecombe	32	13	0	8	6
Rodmell	44	18	0	11	11
Rogate	44	18	0	11	11
Selborne	24	10	0	6	6
Sheet	80	32	0	20	11
South Harting	32	13	0	8	0
Southease	0	0	0	0	11
Stedham	24	10	0	6	6
Stroud	44	18	0	11	11
Steep	0	0	0	0	11
Twyford	80	32	0	20	50
Warningcamp	0	0	0	0	11
West Meon	64	26	0	16	0
Total	6,087	3,429	2,578	2,578	2,578

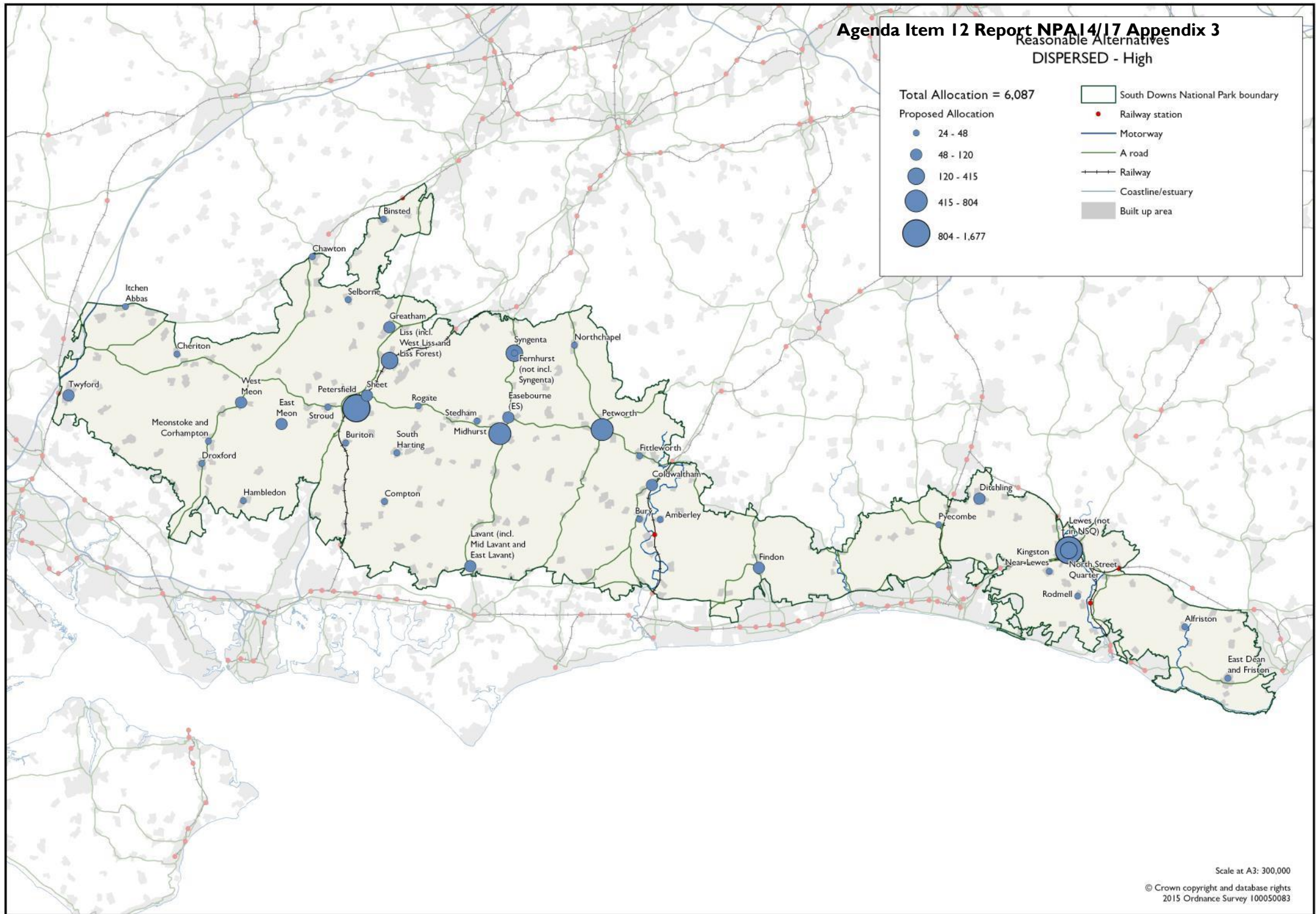
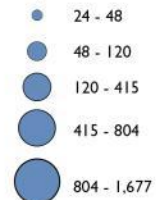
Agenda Item 12 Report NPA14/17 Appendix 3

Reasonable Alternatives

DISPERSED - High

Total Allocation = 6,087

Proposed Allocation



Scale at A3: 300,000

© Crown copyright and database rights
2015 Ordnance Survey 100050083

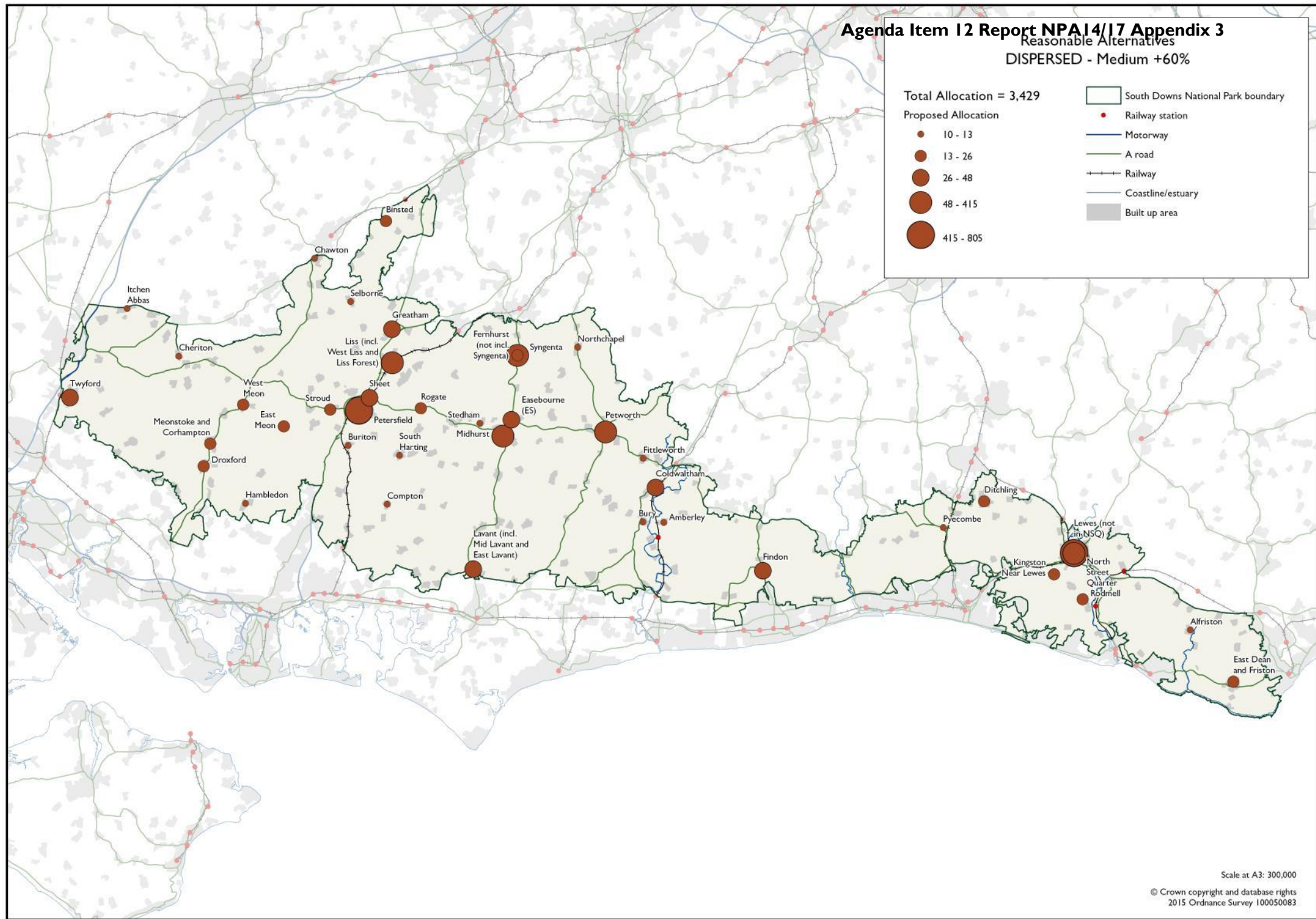
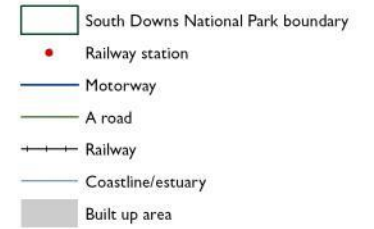
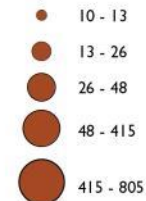
Agenda Item 12 Report NPA14/17 Appendix 3

Reasonable Alternatives

DISPERSED - Medium +60%

Total Allocation = 3,429

Proposed Allocation



Scale at A3: 300,000

© Crown copyright and database rights
2015 Ordnance Survey 100050083

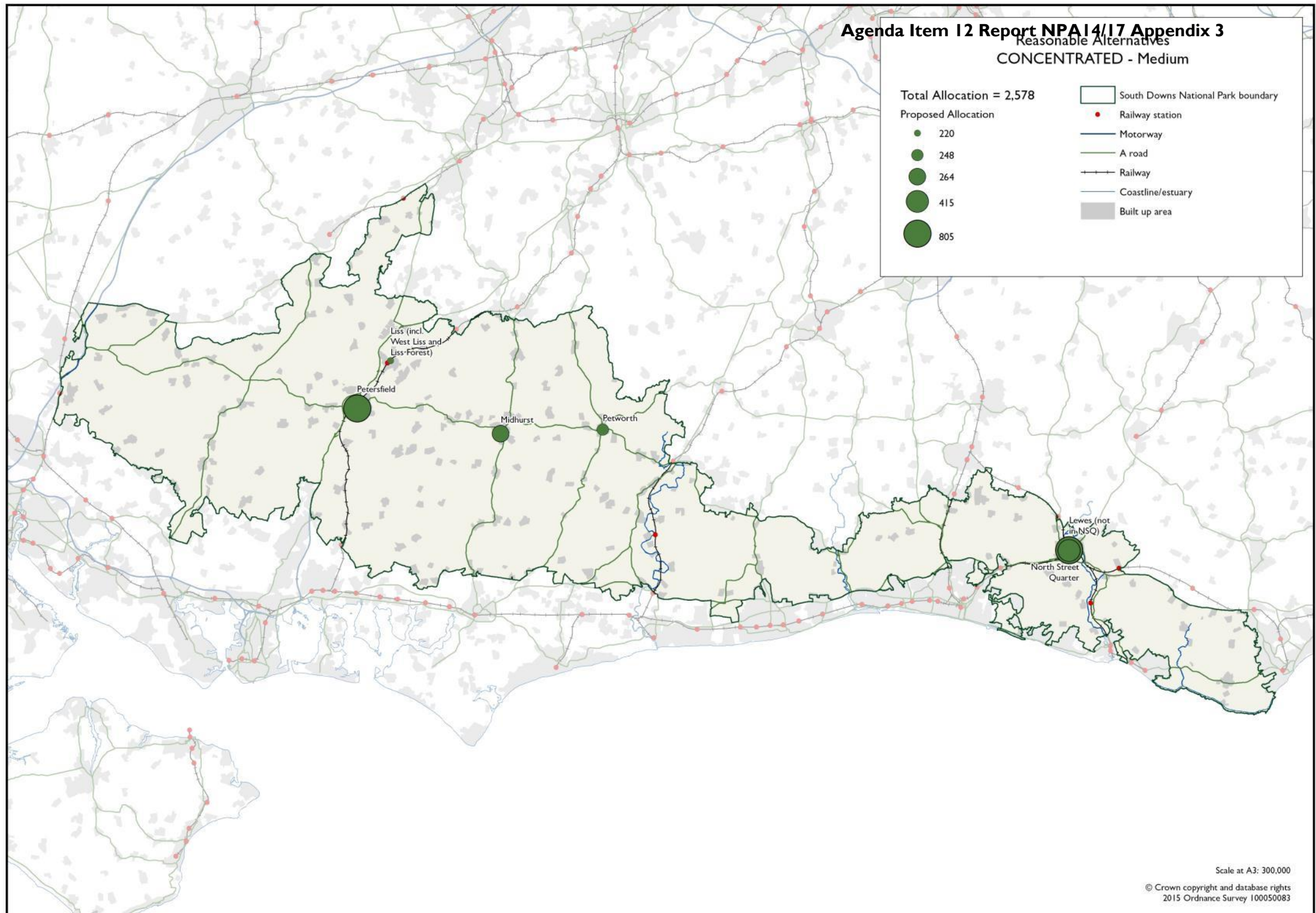
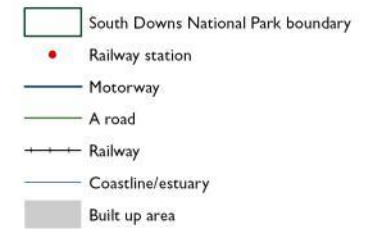
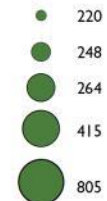
Agenda Item 12 Report NPA14/17 Appendix 3

Reasonable Alternatives

CONCENTRATED - Medium

Total Allocation = 2,578

Proposed Allocation



Scale at A3: 300,000

© Crown copyright and database rights
2015 Ordnance Survey 100050083

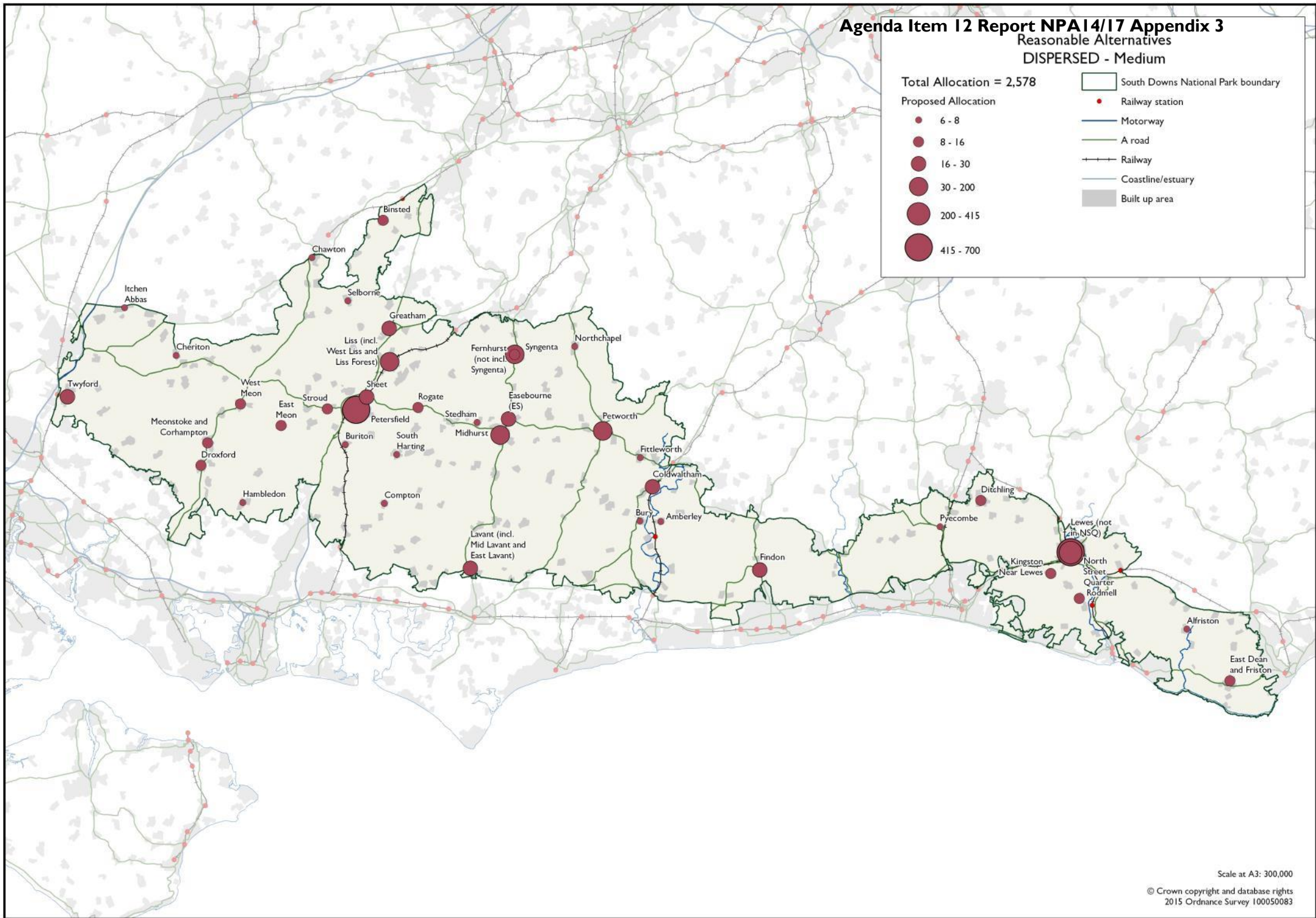
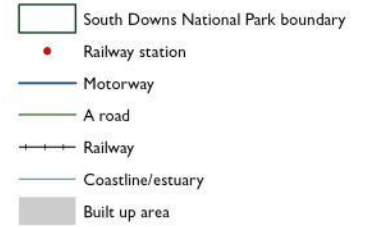
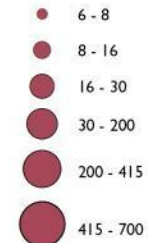
Agenda Item 12 Report NPA14/17 Appendix 3

Reasonable Alternatives

DISPERSED - Medium

Total Allocation = 2,578

Proposed Allocation



Scale at A3: 300,000

© Crown copyright and database rights
2015 Ordnance Survey 100050083

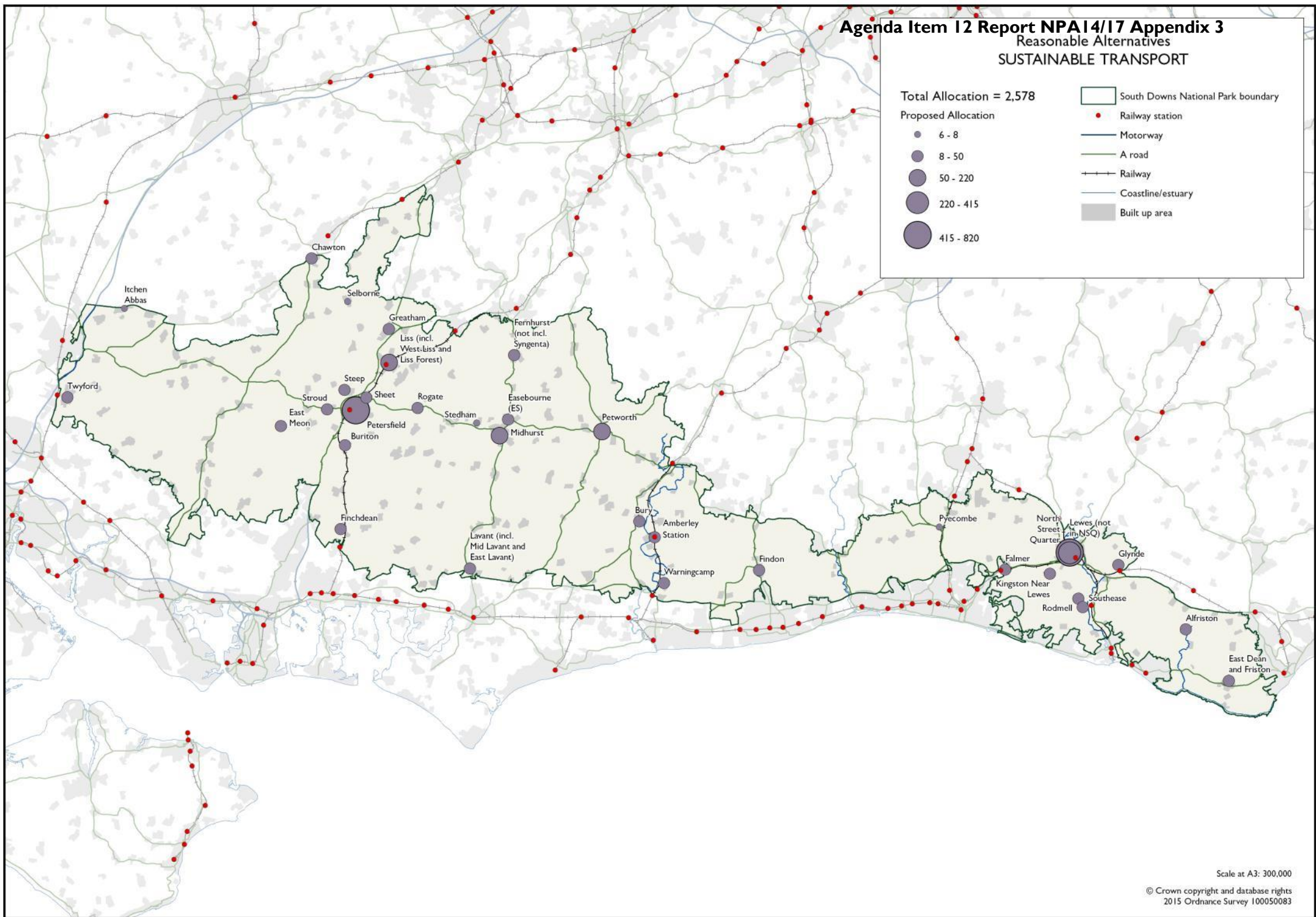
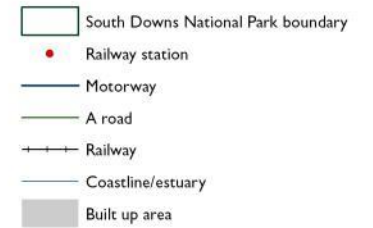
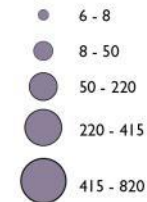
Agenda Item 12 Report NPA14/17 Appendix 3

Reasonable Alternatives

SUSTAINABLE TRANSPORT

Total Allocation = 2,578

Proposed Allocation



Scale at A3: 300,000

© Crown copyright and database rights
2015 Ordnance Survey 100050083

3.2.2 Appraisal findings: development strategy options

The tables presented in **Appendix C** present detailed appraisal findings in relation to the five options introduced above. These are organised by the twelve SA themes.

For each sustainability theme, a commentary on the likely effects (including significant effects) is presented. This is accompanied by an indication of whether likely 'significant effects' (using red / green shading) are likely to arise as a result of the option. Options are also ranked numerically reflecting their relative sustainability performance, with '1' the most favourable ranking and '5' the least favourable ranking.

The table below presents a summary of the appraisal findings for the five options considered. Within each row (i.e. for each Sustainability Theme) the columns to the right hand side seek to both categorise the performance of each option in terms of 'significant effects' (using red / green shading) and also rank the alternatives in order of preference. An explanatory key is set out at the top of the table. Options are ranked numerically in accordance with sustainability performance. A summary commentary is also presented.

Table 3.6: Development strategy options, summary of appraisal findings

Key:

Options with likely significant positive effects	
Options with likely significant negative effects	
Options with no likely significant effects	
Options with uncertain significant effects	
Rankings: from 1 (most favourably performing) to 5 (least favourably performing)	1-5

Rank of preference / categorisation of effects						Summary of potential significant effects
	Option 1: Dispersed High	Option 2: Dispersed Med+60%	Option 3: Concentrat ed Med	Option 4: Dispersed Med	Option 5: Dis Med SustTran	
Landscape	5	4	3	1	3	<p>Significant negative effects have the potential to arise from the two options with the higher levels of housing proposed (Option 1, Dispersed High and Option 2: Dispersed Medium +60%). This is linked to the increased likelihood of these options contributing to the 'Forces for Change' on landscape character identified by the South Downs Integrated Landscape Character Assessment. Option 3: Concentrated Medium option is also likely to lead to significant effects in the vicinities of the five largest towns in the National Park through focussing development at these locations, and, for the same reason, Option 5: Dispersed Medium (Sustainable Transport) is likely to lead to significant effects in the vicinities of Petersfield, Liss and Lewes. The Dispersed Medium option has a reduced likelihood of leading to significant negative effects on landscape character and visual amenity. In terms of tranquillity, Option 1, through increasing the scale and dispersal of new development, has the most potential of the options to lead to significant negative effects on light pollution and tranquillity.</p>

<i>Rank of preference / categorisation of effects</i>						Summary of potential significant effects
	Option 1: Dispersed High	Option 2: Dispersed Med+60%	Option 3: Concentrat ed Med	Option 4: Dispersed Med	Option 5: Dis Med SustTran	
Climate change adaption	5	4	3	1	3	<p>No significant effects are anticipated as a result of the five options. Whilst a number of the options have the potential to lead to elevated levels of flood risk at locations where the SFRA has highlighted particular issues, it is considered that the provisions of the NPPF and national policy in relation to flooding will help guide development away from flood risk areas and ensure that appropriate mitigation measures are implemented. Likewise, in relation to water supply, it is not anticipated that the scale and location proposed through any of the options will lead to significant effects if Water Resource Management Plans are implemented effectively.</p> <p>In terms of coastal zone management the proposed development strategies put forward through the five options limit development within the coastal areas of the National Park in East Sussex.</p>
Biodiversity	5	4	3	1	2	<p>In terms of the larger settlements in the National Park, the options which promote a higher degree of development at these locations (Dispersed High, Dispersed Medium +60% and Concentrated Medium option) have increased potential for effects on the designated sites present in the vicinity of these towns and villages. Dispersed Medium Sustainable Transport also has the potential to lead increase potential for impacts on the sites in the vicinities of Petersfield, Liss and Lewes. In terms of the nature conservation designations located in the vicinity of the smaller settlements in the National Park, the likelihood for significant effects may be limited by the scale of allocations at most of the locations proposed through the options. However, this does not preclude the possibility of significant negative effects on biodiversity in the vicinity of these settlements.</p> <p>Overall the potential for significant negative effects cannot be excluded for any of the options without increased clarity on the potential location and scale of development sites. In this context it is recognised that these elements cannot be determined in detail for the five options due to the broad strategic nature of the options. In relation to effects on European designated sites the Habitats Regulations Assessment currently being undertaken for the Local Plan will help limit any significant effects relating to these sites through the implementation of avoidance and mitigation measures where appropriate.</p>

<i>Rank of preference / categorisation of effects</i>						
	Option 1: Dispersed High	Option 2: Dispersed Med+60%	Option 3: Concentrat ed Med	Option 4: Dispersed Med	Option 5: Dis Med SustTran	Summary of potential significant effects
Cultural heritage	4	3	5	1	2	<p>An increased scale of development proposed for the five primary towns and villages of the National Park through Options 1, 2 and 3 (Lewes, Petersfield, Midhurst, Petworth and Liss) has the potential to have significant negative effects on the historic environment of these settlements without the implementation of careful design and layout and appropriate locational policies. Similarly, Option 5, through increasing development at Petersfield, Liss and Lewes, has the potential to increase the likelihood of negative effects at these towns. Option 3, through exclusively focussing effects on the five larger settlements in the SDNP, will help limit direct impacts from new development on the remaining settlements in the National Park. However, through limiting new development in the majority of villages in the South Downs, Option 3 also reduces the scope for enhancements to be made to the setting of cultural heritage assets and the rejuvenation of existing features and areas of historic environment interest.</p> <p>In terms of Options 4 and 5, effects on the historic environment will depend on the location, design and layout of new development. However the broader spread of development proposed through these options will enable a wider range of cultural heritage assets to benefit from enhanced utilisation of such assets (including through a contribution to the vitality of settlements), high quality and sensitive design and contributions to enhancements to the fabric and setting of historic environment assets.</p>
Cultural activity	4	3	5	2	1	<p>Larger settlements enable a greater variety of cultural activities to be supported. In this context, through delivering an increased degree of development to Lewes, Petersfield, Midhurst, Petworth and Liss, Options 1, 2 and 3 will promote an additional range of cultural activities at these locations. This will also support visitor offer in these towns and villages. However Option 3, through limiting enhancements to the vitality of smaller settlements, will have to do less to encourage the development of new cultural activities in these settlements.</p> <p>Cultural activity and the visitor economy in the National Park are also closely linked to its landscape, setting, cultural heritage and local distinctiveness. In this context, Option 1 has the most potential to undermine the special qualities of the National Park through increased levels of housing development. Option 5, which promotes a dispersed approach to development, whilst also focussing on the settlements with good accessibility by sustainable transport modes, will support a robust and sustainable visitor and tourism economy and an increased range of (and accessibility to) cultural activities. Effects in this regard are however unlikely to be significant.</p>

<i>Rank of preference / categorisation of effects</i>						Summary of potential significant effects
	Option 1: Dispersed High	Option 2: Dispersed Med+60%	Option 3: Concentrat ed Med	Option 4: Dispersed Med	Option 5: Dis Med SustTran	
Health and wellbeing	3	4	5	1	1	Health and wellbeing in the National Park is closely related to a number of factors, including accessibility to services and facilities, the use of healthier modes of travel, access to high quality green infrastructure provision, the quality of housing, levels of crime and security and optimising the benefits that the natural environment offers to the health-and wellbeing of residents and visitors. In this context the options by themselves are unlikely to lead to significant effects in relation to health and wellbeing as effects will depend on factors such as the provision of new services and facilities to accompany new development, the quality and energy efficiency of new housing, and enhancements to open space provision and green infrastructure networks, including pedestrian and cycle links. These elements will in large part depend on the policy approaches taken forward through the SDLP in conjunction with the provisions of national policy and other plans and strategies prepared locally or sub-regionally.
Vitality of communities	1	2	5	3	4	<p>New development in the National Park will support settlements' vitality through promoting the viability of local services and facilities, enhancing local economic offer and supporting cultural activities. In this respect Option 3 has the potential to lead to significant negative effects on the vitality of smaller communities in the National Park through limiting new development at these locations and associated impacts on the demographic diversity present in these settlements, the viability of services, facilities and amenities and local economic opportunities.</p> <p>In terms of the other options, Option 1 will lead to the largest increase in population in the National Park. This will support the vitality of a wider range of settlements. Likewise Options 2 and 4 will also support vitality through promoting a dispersed approach to growth. Option 5, through directing housing provision to the settlements which are best connected by sustainable transport modes will promote the vitality of these towns and villages. Positive effects on these settlements' vitality are likely to be further supported through the accessibility of these locations by sustainable transport modes, which will encourage those who live outside of these settlements to access services and facilities in the town / village. Due to these factors, all of Options 1, 2, 4 and 5 have the potential to support positive effects in relation to community vitality, depending on the extent to which pressures are placed on existing services and facilities. However, vitality is likely to be furthered by promoting development within existing service centres; Option 4 is assessed as more likely to achieve this for the range of smaller settlement in the National Park than Option 5 in the short-medium term.</p>

<i>Rank of preference / categorisation of effects</i>						
	Option 1: Dispersed High	Option 2: Dispersed Med+60%	Option 3: Concentrat ed Med	Option 4: Dispersed Med	Option 5: Dis Med SustTran	Summary of potential significant effects
Accessibility	2	3	5	4	1	<p>Options 1, 2, 3 and 5 which direct an increased level of housing provision to the five largest settlements in the National Park (Lewes, Petersfield, Midhurst, Petworth and Liss) will promote accessibility through directing housing to the settlements with the broadest range of services and facilities. In relation to the smaller settlements in the National Park, the options which promote a more dispersed pattern of development (Options 1, 2, 4 and 5) will support the viability of local services in these settlements. This will promote local residents' accessibility to these facilities. Option 3, through limiting development to the five largest settlements, is unlikely to reinforce support for existing services and facilities in the smaller settlements in the National Park. For those living in the smaller settlements of the National Park, this will lead to negative effects in relation to this Sustainability Theme through limiting accessibility to local amenities in the longer-term.</p> <p>Overall, Option 5 is the best performing in relation to accessibility. Through both 1) supporting existing services in smaller settlements, and 2) locating new development in the core settlements with good sustainable transport links, thereby promoting access by non-car modes to services and facilities. This will lead to some positive effects in relation to this Sustainability Theme but this is tempered by the fact that the option will not, in all cases, promote accessibility through directing housing to the settlements with the broadest range of services and facilities.</p>

<i>Rank of preference / categorisation of effects</i>						Summary of potential significant effects
	Option 1: Dispersed High	Option 2: Dispersed Med+60%	Option 3: Concentrat ed Med	Option 4: Dispersed Med	Option 5: Dis Med SustTran	
Sustainable transport	2	3	4	4	1	Options 1, 2 and 3 which direct an increased level of housing provision to the five largest settlements in the National Park (Lewes, Petersfield, Midhurst, Petworth and Liss) will promote accessibility through directing housing to the settlements with the broadest range of services and facilities and best connections by sustainable transport modes. Option 5 also directs an increased level of development to Lewes, Liss and Petersfield. This will promote the use of sustainable modes of transport. In relation to the smaller settlements in the National Park, the options which promote a more dispersed pattern of development (Options 1, 2, 4 and 5) will support the viability of local services in these settlements. This will help reduce the need to travel to some services and facilities. Through limiting development to the five largest settlements in the SDNP, Option 3 is unlikely to support existing services and facilities in the smaller settlements in the National Park and may increase the need to travel for those living in these villages. The Dispersed Medium Sustainable Transport Option is the best performing in relation to encouraging sustainable transport use. Through both 1) supporting existing services across a wider range of settlements, and 2) locating new development in the settlements with good sustainable transport links, the option will promote access by non-car modes to services and facilities both within the settlement and to those which cannot be accessed locally. This will support significant positive effects for this sustainability theme.
Housing	1	2	5	3	3	By virtue of delivering a larger supply of housing, the higher growth scenarios have increased potential to meet housing needs in the SDNP. In this respect Option 1, and to a lesser extent, Option 2, through delivering a higher quantum of development across a wider range of settlements in the National Park, and facilitating housing growth which more closely reflects population trends, will do most to deliver a wider range of housing which meets a variety of needs. This will support significant positive effects in terms of helping the National Park to meet objectively assessed housing needs. Whilst Option 3 will not deliver housing in smaller settlements in the National Park (and as such has been ranked lowest), it may have the potential to generate more affordable housing through S106. However the option, through precluding development in the majority of settlements in the National Park, will have significant negative effects in relation to the delivery of rural housing provision.
Climate change mitigation	5	4	1	3	2	Overall, due to the relatively limited contribution of new development proposed through the options in the context of wider regional, national and global greenhouse gas emissions, and the associated likelihood of the influence of the growth strategy promoted through the SDLP on emissions being minor, no significant effects are anticipated in relation to climate change mitigation.

Rank of preference / categorisation of effects						Summary of potential significant effects
	Option 1: Dispersed High	Option 2: Dispersed Med+60%	Option 3: Concentrat ed Med	Option 4: Dispersed Med	Option 5: Dis Med SustTran	
Economy	3	4	5	1	2	<p>New housing provision in the SDNP will support the National Park's towns and villages' economic vitality through promoting the viability of local services and facilities, enhancing local economic offer, increasing the local market for goods and services and supporting cultural activities. In this context, Options 1, 2, 4 and 5 will support the economic viability and vitality of smaller settlements in the National Park, with potential positive effects for the local economy. For similar reasons, Option 3 will limit economic opportunities resulting from population increases in the smaller villages of the National Park, reducing the economic vitality of rural settlements. In the context of the vitality of the rural economy over the longer term, this has the potential to lead to significant negative effects, even with increased benefits through Option 3 to the economy of the three largest communities in the National Park, Lewes, Petersfield and Midhurst.</p> <p>The vitality of the visitor economy in the SDNP is closely linked to the National Park's landscape, setting, cultural heritage and local distinctiveness. A key element relating to the visitor economy will be to achieve an effective balance between supporting the vitality and viability of a settlement and protecting and enhancing the natural and built environment. In light of this consideration, Option 5, which promotes a dispersed approach to development whilst also focussing on the settlements with good accessibility by sustainable transport modes, will support a robust and sustainable visitor and tourism economy. This is likely to lead to positive effects in relation to this theme. However, the increased focus on allocating to settlements in close proximity to some measure of sustainable transport is not, in all cases, supporting the existing rural service centres. Settlements such as Finchdean and Warringcamp are not well-served in terms of services and this tempers the overall positive effect on the rural economy in the short-medium term.</p>

Conclusions

Overall, Option 1 (Dispersed High), and to a lesser extent, Option 2, (Dispersed Medium +60%) performs least favourably in relation to the landscape, climate change adaptation, cultural heritage and climate change mitigation sustainability themes. This reflects the higher growth levels to be delivered through the options, which have the most potential to lead to significant negative environmental effects in the National Park from increased levels of development. In particular significant negative effects have the potential to arise through this Option 1 in relation to landscape and biodiversity - as such, it represents the greatest risk that the plan would conflict with the Purposes and Duty of the National Park in this regard with Option 2 representing marginally lower risks.

Option 3 (Concentrated Medium), through focussing a higher level of housing growth on the five largest settlements in the National Park, also has the potential to have significant effects on landscape and biodiversity, albeit limited to significant effects in the vicinity of Lewes, Petersfield, Midhurst, Petworth and Liss. Option 4 and 5, through promoting a dispersed medium growth approach to housing provision, will help limit concentrated effects on sensitive environmental receptors, and increase opportunities for avoidance and mitigation measures.

In terms of the socio-economic sustainability themes, whilst Option 3 (Concentrated Medium) will support the provision of services and facilities in the five main settlements in the SDNP, and promote these settlements' vitality, this would be to the detriment of the other smaller settlements in the National Park. In this respect the option has the potential to result in significant negative effects in relation to rural vitality, rural service provision, meeting localised housing needs and the rural economy.

In relation to housing provision, Option 1, and to a lesser extent, Option 2, through delivering a higher quantum of development across a wider range of settlements in the National Park, and facilitating housing growth which more closely reflects population trends, will do most to meet objectively assessed housing needs. However, this will likely be detrimental to the special qualities of the National Park. Whilst Option 3 will not deliver housing in smaller settlements in the National Park, it may have the potential to generate more affordable housing through the standard model of affordable housing being provided alongside market housing.

Option 5 has merit in supporting accessibility to services, facilities and amenities in three of the larger settlements, promoting the use of sustainable transport modes, and helping to limit greenhouse gas emissions from transport. However, it incorporates levels of housing in the core settlements that are assessed as having potentially significant negative impact upon the landscape / townscape and upon cultural heritage impacting upon conservation areas and their context.

Overall, Options 4 and 5, through promoting a more dispersed approach to housing delivery whilst also proposing a medium growth scenario, will do the most of the options to provide a balance between 1) promoting the vitality of a wider range of settlements in the SDNP and supporting the rural economy, whilst also 2) protecting and enhancing the special qualities of the National Park. Option 4, however, is assessed as contributing more to maintaining existing rural services in smaller settlements.

3.2.3 Testing higher and lower levels of housing delivery

The 2015 South Downs SHMA considered the potential level of housing required to support the estimated growth in employment as set out in the Employment Land Review¹². This analysis suggests a growth in jobs from 2013 to 2033 of 11.6% (0.6% per annum). In considering the housing market implications, data has been modelled on the basis of this percentage increase in jobs and assumed an equivalent increase in the resident working population.

Applying the expected percentage growth in jobs, along with the application of assumptions on changing employment rates and the resultant change in workforce, results in growth in the region of between 8,600 and 10,500 households between 2013 and 2033. This results in a range of employment-led housing figures of between 458-566 dwellings per annum (dpa). In the same way as the "Blended Headship rate"¹³ is considered robust for the demographic growth figures, the blended headship figure has also been used for estimating the employment led housing provision figures. This gives a figure of 525dpa.

As highlighted above, the SA has not tested the 525 dpa figure, and instead tests a range of figures up to 450 dwellings p.a. It was considered that, taking into account the constraints on development with respect to a nationally designated landscape, that this level of housing growth was unachievable without undermining the purposes of the National Park. This was reflected by the appraisal findings linked to Option 1 (Dispersed High) presented above.

Therefore, it was considered that to test figures which go beyond this would clearly result in unacceptable impacts on the landscape and would constitute unreasonable alternatives.

At the other end of the scale, the SHMA assessed a number of demographic projections for the National Park. This included zero net migration which would actually have resulted in a 6.1% drop in the National Park's population due to the older age structure. This is clearly not a reasonable alternative and would undermine the duty of the SDNPA to foster the socio-economic well-being of local communities within the National Park.

3.2.4 Employment options

Policies SD34: Sustaining the Local Economy and SD35: Employment Land of the current version of the Local Plan address sustainable economic development in the National Park. The main evidence base supporting these policies is the Employment Land Review (ELR) that was prepared in 2015 by GL Hearn and updated in 2017. SD35 sets out the following requirements for new employment land:

- Offices: 2-3 ha;
- Industrial/warehousing: approximately 5ha.

Calculating these figures was problematic due to the paucity of statistical returns available for the National Park area. This is fully explained in the ELR. The requirements meet the objectively assessed need for employment as calculated in the ELR notwithstanding the problems encountered in calculating this. In this context it was necessary to carry forward employment figures from adopted and emerging Joint Core Strategies i.e. those for Lewes and East Hampshire.

The South Downs Local Plan does not focus on allocating employment sites. This is because the requirements above can be met through extant permissions and allocations in Neighbourhood Development Plans. It did not therefore seem reasonable to put forward alternative options when the requirements have already been met. In coming to this conclusion it was important to understand

¹² GL Hearn (2015) South Downs Employment Land Review, updated 2017

¹³ The 'blended headship' rate scenario has been accepted as reasonable at a number of local plan examinations, including Derbyshire Dales. It takes into account changes in housing market activity and household formation in a changing economic climate. The higher end of the range models a more positive scenario for household formation, with household formation rates returning towards longer-term trends over the period to 2033.

DRAFT

more about the nature of employment in the National Park. The National Park's business base is focused on small businesses many of which are home based and simply do not have the requirements for large scale allocations of employment land for offices, warehouses etc.

3.2.5 Why has the preferred development strategy been chosen?

The SDNPA has considered that, based upon landscape sensitivity assessment from the most recent SHLAA published in December 2016, it has become apparent that the Dispersed High option cannot be delivered without significant impact upon the landscape character on the majority of the settlements in the National Park, including the five larger settlements of Lewes, Liss, Midhurst, Petersfield and Petworth. For the larger settlements, limited availability of sites in relation to the very high delivery figure means that housing would have to be built on sites assessed as unsuitable for development without detriment to the townscape character of the settlements and at sites beyond the settlement boundary. The latter category includes sites that serve as green fingers which connect with the existing countryside affording impressive views out from urban areas and, where ground is elevated, representing commanding viewpoints of the settlements. Insufficient flexibility exists for delivery of housing at sites assessed as developable within the SHLAA at higher densities to satisfy the Dispersed High allocations because of the implications that it would have for landscape character and the existing built form.

Around smaller villages in the National Park, settlement boundaries have previously been used to delimit future growth to levels appropriate to the existing function and character of the development. The rural settlements of the National Park form an integral part of the landscape character and are one of the seven special qualities of the National Park; the housing proposed under the Dispersed High option could not be absorbed in many historic villages without significant detrimental landscape impact. This might constitute extension to settlements inconsistent with their historic form or development of greenfield sites, remote from the main settlement, blurring the distinction between settlements and open countryside and impacting on the special qualities of the National Park. This would run counter to the core policies and strategic Landscape Character policy SD5 in the Local Plan.

In terms of the Concentrated Medium option, it was viewed that this would have unacceptable impacts in particular on Lewes and Midhurst as well as failing to deliver the sustainable development required by smaller settlements across the National Park. Both Lewes and Midhurst currently lack suitable sites to deliver the allocation under this scenario. As a consequence, if pursued, it would result in significant adverse impact on landscape character, cultural heritage and sense of place for these settlements and the loss of existing amenity sites such as recreation and common land. Additionally, some existing services are already assessed as insufficient to meet current needs, examples being children's play facilities that do not currently meet local standards in the key settlements assessed¹⁴ and sports and recreation facilities similarly assessed below standard in the key settlements with the exception of Petersfield, that is well served.

The Concentrated Medium option would also fail to satisfy sustainability objective 6, "*To create and sustain vibrant communities*" which recognises the needs and contributions of all individuals. Concentration of development in five larger settlements with no allocation being made for smaller settlements across the National Park will fail to address the needs of affordable housing in the majority of parishes. Lack of housing provision will further inflate property prices in rural areas that is likely to price out younger people and result in an ageing demographic. This, in turn, will have effects on community vitality by limiting the diversity of age ranges present in a village and reducing the viability of facilities such as local schools. The option is likely to threaten growth in the rural economy that is linked to population growth and inward investment.

The Dispersed Medium Sustainable Transport option has merit; however, further work on the availability of sites and potential landscape impact of this option would be required. The criteria for

¹⁴ SDNPA Open Space, Sports and Recreation Study (in draft). This report has collated data on existing provision against locally set standards based upon the most recent assessments; further work is required to assess Midhurst for which recent data is not available.

DRAFT

selection that has included a Monday to Friday bus service, total journey time of less than 30 minutes and/or less than 2 miles from a rail station, means that, while supplementing their existing transport options, the full day to day needs of most people would not be met. It is unlikely, for example, to have much impact on use of vehicles for primary school runs. Furthermore, the reliance of rural bus services upon heavy subsidies raises questions over the future of some services in the long-term.

The preferred option is the Dispersed Medium option. The proposed allocations included in the Local Plan will assist in delivering the evidence-based housing provisional figures for the SDNP for the most part, whilst safeguarding the landscape character of the National Park based upon the landscape sensitivity assessment undertaken as part of the SHLAA. Policy SD26 of the draft Pre-Submission Local Plan (Supply of Homes) specifies a number of settlements that will accommodate approximate levels of housing. The distribution of this development is in accordance with Policy SD25 (Development Strategy) that directs development to the most sustainable locations, taking into account the availability of suitable land (based on detailed landscape assessment), the services that land and the surrounding area currently provides including ecosystem services, the need to sustain balanced communities, and taking into account the function of, and relationship between, settlements.

In terms of the current distribution strategy taken forward through Pre-Submission Local Plan, for some settlements there are departures from the numbers initially proposed by the Dispersed Medium option (i.e. the numbers presented in Table 3.5). The settlements, and the reasons for the departure from the housing numbers considered, are as follows:

Table 3.7: Settlements where housing numbers depart from the figure considered through the Dispersed Medium option

Settlement	<i>No. proposed through Dispersed Medium Option</i>	<i>No. proposed through current policy SD26</i>	<i>Reason for departure</i>
Alfriston	6	15	The Settlement Facilities Study (SFS ¹⁵) gave a score of 9.5 – the 9th highest score for all SDNP settlements. Therefore it was deemed appropriate to further facilitate the use of suitable and available sites in the village. Both sites proposed are also mostly previously developed land. Their redevelopment will help enhance the quality of the public realm in the village.
Chawton	6	0	No suitable and available sites were identified in the SHLAA
Cheriton	6	14	The site identified in Cheriton has a capacity of 12-15. Village has a primary school and scores 6 in SFS. Constraining number of houses on the site identified to under ten dwellings would limit the scope for delivering affordable homes.
Coldwaltham	20	38	The figure of 20 was capacity-based number from the suitable and available site identified in the SHLAA. The new site in the Pre-Submission plan is assessed as having capacity for 35 to 40. Coldwaltham is well-connected to Pulborough and Petworth, and has a school that would benefit from increased pupil intake. The new higher figure is appropriate for the new site.
Compton	24	0	There were insufficient suitable and available sites identified in the SHLAA.

¹⁵ The Settlement Facilities Study was undertaken for the Local Plan evidence base. Its purpose is to assist in identifying the role and function of settlements in the National Park based on the number and type of facilities and services they provide. The study can be accessed at: <https://www.southdowns.gov.uk/wp-content/uploads/2015/09/Settlement-Facilities-Assessment-Report-and-Appendix-A.pdf>

DRAFT

<i>Settlement</i>	<i>No. proposed through Dispersed Medium Option</i>	<i>No. proposed through current policy SD26</i>	<i>Reason for departure</i>
Droxford	11	30	Scores 6 in the SFS which makes it well-placed for growth in terms of local facilities. Suitable site subsequently identified with capacity for 26-32 dwellings. Appropriate to increase number therefore.
Easebourne	20	50	Figure increased to reflect high sustainability of the settlement, which is located adjacent to Midhurst. Since Preferred Options, three further sites have been identified in the SHLAA updates as suitable and available. Given this and the high provision of local facilities (scored 10 in SFS), it was considered appropriate to allocate two further sites. Two of the three sites proposed also comprise previously developed land. Their redevelopment will help enhance the quality of the public realm in the village.
Hambleton	6	0	There were no suitable and available sites identified in the SHLAA.
Lavant	20	55	The Lavant Neighbourhood Plan allocates land for 55 dwellings within the National Park. The numbers in the Local Plan will reflect this.
Northchapel	6	0	There were no suitable and available sites identified in the SHLAA.
Petersfield	700	805	Petersfield Neighbourhood Plan has been made and allocates land for 805 dwellings; this number has been carried forward to policy SD26 of the Local Plan.
Rodmell	11	0	There were no suitable and available sites identified in the SHLAA.
Stedham	6	18	The current figure is based on estimated capacity of Stedham Saw Mill site, which is expected to come forward as a mixed use development. Stedham scores 5.5 in the SFS, indicating that it is well-placed to support a modest amount of housing development. The site is previously developed and it re-development to will serve to conserve and enhance the gateway into the village from the A272.
Stroud	11	28	The village is 1.5 miles from the town of Petersfield, indicating that it is well-placed for a modest amount of housing growth. The SHLAA indicates that the suitable and available site has capacity for 30 dwellings. Current proposal for the site includes option to provide a new community hall.
Steep	0	10	Steep was not originally provided with a figure. However following reassessment, a suitable and available site has been identified. Steep was always included as an SD25 (formerly SD22) settlement with a policy boundary, and scored 5 in the SFS (has a primary school). It is also only 1.5 miles from the centre of Petersfield. Therefore it is appropriate to provide for some housing growth, commensurate with the capacity of the site identified.

DRAFT

<i>Settlement</i>	<i>No. proposed through Dispersed Medium Option</i>	<i>No. proposed through current policy SD26</i>	<i>Reason for departure</i>
West Ashling	0	10	West Ashling was not originally provided with a figure. However a new SHLAA site has since emerged which was found to be suitable and available. The village is close to Chichester, and scored 4 in the SFS indicating that some housing is appropriate. The one site identified can accommodate 8-12 dwellings.

The housing numbers allocated in the remaining settlements are consistent with the numbers previously considered through the Dispersed Medium option.

3.2.6 Appraisal and choice of sites taken forward for inclusion in the Local Plan

The sites considered through the SA process are from the longer list of SHLAA sites considered for inclusion for the Local Plan.

As a landscape led plan, the influence on landscape character of proposed development features prominently in the Local Plan and was a prominent consideration in the assessment of suitable development sites through the SHLAA process.

Table 3.8 shows the criteria applied in terms of landscape sensitivity assessment of SHLAA sites. All the sites allocated for housing in the Local Plan were assessed through the SHLAA and were therefore assessed in terms of landscape sensitivity.

Table 3.8: Landscape sensitivity assessment criteria for SHLAA sites

<i>Sensitivity assessment</i>	<i>Definition</i>
Low	Key characteristics of the landscape are robust and would not be adversely affected by development. The landscape is likely to be able to accommodate development without a significant change in landscape character.
Low/Medium	Some of the key characteristics of the landscape are robust and would not be adversely affected by development. Some limited changes in character may result from development.
Medium	Some of the key characteristics of the landscape are vulnerable to change. Although the landscape may have some ability to absorb some development, it is likely to cause some change in character. Care would be needed in locating development.
Medium/High	Key characteristics of the landscape are vulnerable to change. There may be limited opportunity to accommodate development without changing landscape character. Great care would be needed in locating development
High	Key Characteristics of the landscape are highly vulnerable to development. Development would result in a significant change in Landscape character and should be avoided.
Low/Medium	Key characteristics of the landscape are robust and would not be adversely affected by development. The landscape is likely to be able to accommodate development without a significant change in landscape character.

DRAFT

It will be noted from the table above that there are no absolutes in the criteria; rather there is a scale of increasing sensitivity of sites classified Low to High where Low generally indicates suitability for development and High represents the unsuitability of sites without significant risk to landscape character. Furthermore, the SHLAA assessed most sites as a whole although for some larger sites, where appropriate, differentiation between more sensitive and less sensitive areas of the same site was noted.

The methodology for considering which sites should be taken forward for the purposes of the Local Plan, and the list of sites excluded and rejected, are presented in **Appendix D**.

In order to provide a clear road map on the selection of sites for allocations in the Local Plan it is important to look at reasonable alternatives in the SA. If a site has been strongly rejected in the SHLAA for landscape or other reasons, it is not a reasonable alternative and need not be considered by the SA. This approach applies equally to sites that are no longer available. However, there are some sites that can be considered to be reasonable alternatives that are not allocated in the plan. A basic appraisal of these sites against the SA sustainability objectives is set out in Table 3.9.

Table 3.9: Appraisal of sites identified as reasonable alternatives

Site (including SHLAA reference)	Landscape	Climate Change Adaptation	Biodiversity	Cultural Heritage	Cultural Activity	Health and Wellbeing	Vitality of Communities	Accessibility	Sustainable Transport	Housing	Climate Change Mitigation	Local Economy
EA005 Land at Greenways and Kiln Lanes, Buriton	-		?			?	+	+	+	+	-	+
Allocation of the site for housing would have the potential to lead to significant landscape impacts. This is given the size of the site and its High/Medium landscape sensitivity. The site has some biodiversity interest, relating to on site hedgerows.												
The site is relatively close to the railway line, with the potential for noise effects on health and there is a Historic Landfill Site within 250 metres of the proposed development site.												
The site is not constrained by historic environment considerations and the site is not located within an area at risk of fluvial, surface water or groundwater flooding. The site is accessible to existing village facilities and amenities, including the school, pub and sports facilities, and the facilities in Petersfield via bus.												
WI071 Grey Farm Bungalow, Cheriton	?		-				+	+	+	+	-	+
The upper most easterly part of the site is considered to be Medium High landscape sensitivity and the more westerly section to be medium sensitivity. The site is located close to the River Itchen SAC/SSSI and is within the Impact Risk Zone for the SSSI for all planning applications. As such development at this location has the potential to have negative impacts on these key internationally and nationally designated sites without appropriate avoidance and mitigation measures.												
The site is not constrained by historic environment considerations and the site is not located within an area at risk of fluvial, surface water or groundwater flooding. The site is accessible to existing village facilities and amenities and is located close to an existing bus link between Winchester, New Alresford and Petersfield.												
HO015 Land at Brookland Way, Coldwaltham	-		-				+	+	?	+	-	+
Allocation of the site would have the potential to lead to significant landscape impacts. Part of 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 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. The site is located within close proximity to the Waltham Brooks SSSI, which has been evaluated as being in an 'unfavourable recovering' condition and the site is within the SSSI's Impact Risk Zone. The												

DRAFT

Site (including SHLAA reference)	Landscape	Climate Change Adaptation	Biodiversity	Cultural Heritage	Cultural Activity	Health and Wellbeing	Vitality of Communities	Accessibility	Sustainable Transport	Housing	Climate Change Mitigation	Local Economy
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 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.												
CH147 1&2 Rotherfield Mews, Dodsley Lane, Easebourne	?		?	?			+	-	+	+	-	+
The site is located close to the Easebourne Conservation Area and has some townscape sensitivity. It is also located adjacent to a SNCI. The site has significant access issues relating to its location at the entrance to the hospital. The site is not located within an area at risk of fluvial, surface water or groundwater flooding The site, which is located approximately 800m to the centre of Midhurst, has good accessibility to the services and facilities in the town.												
AR047 Atalanta and Mayland, Findon Bypass, Findon							+	+	+	+	-	+
The site is a previously developed site and is accessible to existing village facilities and amenities, including the school, post office, shops, pubs and sports/recreational facilities. The site is also, due to its relative proximity to Worthing, accessible to the range of services, facilities and amenities located in the nearby south coast conurbation. The site is not constrained by historic environment or biodiversity considerations and the site is not located within an area at risk of fluvial, surface water or groundwater flooding.												
AR046 Soldiers Field Stables, Findon	?						+	+	+	+	-	+
The site has Medium Landscape sensitivity, and is located on a greenfield site with no existing screening. As such there is the potential for landscape character impacts from new development at this location. The site is not constrained by historic environment or biodiversity considerations and the site is not located within an area at risk of fluvial, surface water or groundwater flooding. The site is accessible to existing village facilities and amenities, including the school, post office, shops, pubs and sports/recreational facilities. The site is also, due to its relative proximity to Worthing, accessible to the range of services, facilities and amenities located in the nearby south coast conurbation.												
LE014, Land to the South of Wellgreen Lane, Kingston near Lewes	?						+	+	?	+		+
The site has some landscape sensitivity, and development at this location would have impacts on the existing villagescape of Kingston near Lewes. The site is not constrained by historic environment or biodiversity considerations and the site is not located within an area at risk of fluvial, surface water or groundwater flooding. The site is accessible to existing village facilities and amenities, including the primary school, village hall, pub and sports/recreational facilities. The site is also, due to its relative proximity to Lewes, accessible to the range of services, facilities and amenities located in the town, though bus links are poor.												

DRAFT

The two main reasons for the non-allocations are as follows:

- when a site has been included in the Preferred Options but then taken out, because a preferable site for the settlement has since been identified
- when the SHLAA has identified other 'has potential' sites that have not been taken forward, as there are more sites than needed to accommodate the level of growth deemed suitable for the settlement.

This process has led to 41 sites being allocated in the Pre-Submission consultation version of the Local plan as housing, employment or mixed use sites. The site allocation policies have been discussed and assessed in **section 5.2 and Appendix E** of this SA Report.

3.3 Appraisal of options for the Shoreham Cement Works site

Shoreham Cement Works is a 44 hectare site that includes an inactive chalk quarry and semi-derelict works. It is the most prominent site within the National Park in a key location where the Park is at its narrowest. Despite being an important part of the social and industrial heritage of the area, the site has a significant negative visual impact on the National Park, particularly from public rights of way and wider viewpoints, including the South Downs Way and the Downs Link cycle route.

The National Park Authority's main objective for the site is to restore it in a way that is compatible with the special qualities and statutory purposes of the National Park. Major development may provide an opportunity for the site to be restored by enabling the demolition or renovation of unsightly buildings, suitable treatment of prominent quarry faces and other landscaping improvements. The site is a strategic site, and as such, detailed development parameters will be set out in an Area Action Plan for the location. These detailed parameters, including reasonable alternatives, will be appraised through an SA undertaken to support the Area Action Plan's development.

In light of the opportunities provided by the site, the current SA process has undertaken an appraisal of a number of strategic-level alternative options for the site. The purpose of the appraisal is to explore the likely sustainability implications and trade-offs that would be required if different approaches to development of the site are taken. In this context six options have been considered for the site through the SA process, linked to different uses for the site relating to Land Use Classes¹⁶. These are as follows:

- **Option 1a:** Housing-led approach to redevelopment of the site, delivering 350 homes (C3 use)
- **Option 1b:** Housing-led approach to redevelopment of the site, delivering 600 homes (C3 use)
- **Option 2:** Employment-led approach to the redevelopment of the site, focused on 'B' uses, with 80% B uses and 20% A, C1 and D uses
- **Option 3:** Leisure / tourism-led approach to the redevelopment of the site, focused on 'A', 'C' and 'D' uses, 80% A, C1 and D uses and 20% B uses

The following table present appraisal findings in relation to the four options introduced above. These are organised by the twelve sustainability themes.

For each sustainability theme, a commentary on the likely effects is presented. Options are also ranked numerically reflecting their relative sustainability performance, with '1' the most favourable ranking and '4' the least favourable ranking.

¹⁶ The Town and Country Planning (Use Classes) Order 1987 (as amended) puts uses of land and buildings into various categories known as 'Use Classes'. Class A broadly aligns with shops, eating and drinking establishments and professional services, Class B relates to business, industrial or storage/distribution activities, C1 class relate to hotels and hostels, C3 dwelling houses, and Class D relate to non-residential uses such as leisure or services. A description of the Use Classes can be accessed as follows: https://www.planningportal.co.uk/info/200130/common_projects/9/change_of_use

DRAFT

Table 3.10: Appraisal of options for the Shoreham Cement Works site**Option 1a: Housing-led approach to redevelopment of the site, delivering 350 homes****Option 1b: Housing-led approach to redevelopment of the site, delivering 600 homes****Option 2: Employment-led approach to redevelopment of the site, focused on 'B' uses, with 80% B uses and 20% A, C1 and D uses****Option 3: Leisure / tourism-led approach to redevelopment of the site, focused on 'A', 'C1' and 'D' uses, 80% A, C1 and D uses and 20% B uses**

SA theme	Discussion of potential effects and relative merits of options	Rank of preference, options			
		1a	1b	2	3
Landscape	<p>The site, which is an inactive chalk quarry and former cement works, currently has a significant effect on landscape quality in the area. It has a visual impact on both the local and wider landscape character of the area, which is further accentuated by its prominent location at the narrowest part of the National Park. In this context there is considerable opportunity for development options to lead to significant improvement in landscape quality in the area and enhance views from key locations in the National Park (including works to remediate land and reuse / remove unsightly buildings which detract from the landscape character of the area).</p> <p>Of the two housing options, Option 1a, has a lesser impact due to its smaller land take. Whilst high quality design can lessen any impact, any housing proposed would still have an impact on tranquillity and the dark skies reserve. .</p> <p>In relation to the two other options, given the typical design and layout of B uses, it is likely that Option 2 has the most potential to lead to impacts on landscape character. These uses are also likely to increase HGV and LGV vehicle movements in the area, with associated impacts on noise quality and tranquillity. In contrast, the focus on A, C1 and D uses proposed by Option 3 offers additional significant opportunities for the provision of high quality design which complements the surroundings, and is less likely to lead to significant increases in HGV and LGV vehicle movements.</p> <p>Impacts under any of the options are possible however, and depend on the design and layout of new development, the remodelling and removal of unsightly buildings, the location of development in relation to key viewpoints in the area, and the integration of high quality green infrastructure provision.</p>	2	3	4	1

DRAFT

Option 1a: Housing-led approach to redevelopment of the site, delivering 350 homes**Option 1b: Housing-led approach to redevelopment of the site, delivering 600 homes****Option 2: Employment-led approach to redevelopment of the site, focused on 'B' uses, with 80% B uses and 20% A, C1 and D uses****Option 3: Leisure / tourism-led approach to redevelopment of the site, focused on 'A', 'C1' and 'D' uses, 80% A, C1 and D uses and 20% B uses**

SA theme	Discussion of potential effects and relative merits of options	Rank of preference, options			
		1a	1b	2	3
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 Adur) leads to potential effects from new development at this location on fluvial and surface water flooding.</p> <p>In relation to the options considered, it is difficult to differentiate between these without an understanding of the necessary development-specific elements associated with the options albeit employment uses are deemed to be 'less vulnerable' than housing when assessing flood risk.</p> <p>For example the effect of each option on flood risk from surface water runoff is difficult to establish given uncertainties regarding the nature of development and the incorporation of mitigation measures such as sustainable urban drainage systems (SuDS). It is also considered that the provisions of the NPPF and national policy in relation to fluvial and surface water flooding in the area will help guide development away from flood risk areas and ensure that appropriate mitigation measures are implemented. For example, the NPPF does not permit development within flood risk areas or where the effect would be to increase flood risk elsewhere without appropriate mitigation measures. Likewise, adherence to the recommendations and guidance presented in the Strategic Flood Risk Assessment (SFRA) undertaken to inform the Local Plan will help limit effects. There will also be a requirement for site specific flood risk assessment to be undertaken and an appropriate surface water drainage strategy (including implementation) agreed.</p> <p>The resilience of the site to the likely effects of climate change also depends on the provision of on-site green infrastructure networks which will support climate change adaptation through helping to limit the effects of extreme weather events and regulating surface water run-off. Green infrastructure enhancements will also help increase the resilience of ecological networks to the effects of climate change through making provision for habitat management and enhancing biodiversity corridors, option 3 could potentially offer the greatest opportunity for enhancements</p>	3	4	1	2

DRAFT

Option 1a: Housing-led approach to redevelopment of the site, delivering 350 homes**Option 1b: Housing-led approach to redevelopment of the site, delivering 600 homes****Option 2: Employment-led approach to redevelopment of the site, focused on 'B' uses, with 80% B uses and 20% A, C1 and D uses****Option 3: Leisure / tourism-led approach to redevelopment of the site, focused on 'A', 'C1' and 'D' uses, 80% A, C1 and D uses and 20% B uses**

SA theme	Discussion of potential effects and relative merits of options	Rank of preference, options			
		1a	1b	2	3
Biodiversity	<p>A range of biodiversity constraints are present on and in the vicinity of the site. The site itself is a Regionally Important Geological Site, comprises a range of BAP Priority Habitats (including good quality semi-improved grassland, deciduous woodland and lowland calcareous grassland) and is home to protected bird species.</p> <p>The Beeding Hill to Newtimber Hill SSSI, is immediately adjacent to the site on its northern boundary. The SSSI is on the scarp slope of the South Downs and is a site of both geological and biological importance. Three nationally uncommon habitats are represented: south-east chalk grassland, juniper scrub and calcareous pedunculate oak-ashbeech woodland. The SSSI supports a rich community of invertebrates, especially harvestmen and has some uncommon butterflies and moths.¹⁷ The SSSI has been evaluated to be in a 'favourable' condition.</p> <p>The site is also located within the SSSI's 'Impact Risk Zone' for 'all planning applications- except householder applications'. As such, strategic scale development of all types (i.e. under each of the options) raises the possibility of adverse effects on the SSSI without avoidance and mitigation measures. The cement works site also comprises a range of BAP Priority Habitats, including.</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 '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'.</p> <p>In this context each option has the potential to lead to significant impacts on habitats and species without appropriate design and layout and the integration of infrastructure which supports ecological networks in the area. In terms of differentiating between the options, Option 1a potentially proposes a smaller scale of development in land take terms than the other options however, both housing options have a greater impact from recreational disturbance (caused by people and pets).</p> <p>It is recognised that a smaller scale of development may limit the scope for larger scale green infrastructure enhancements on site which support habitats, species and ecological networks. As such, whilst all of the options have the potential to lead to effects on biodiversity, the significance of effects depends on the integration of measures to protection and enhance biodiversity on the site.</p>	1	1	1	1

¹⁷ Beeding Hill to Newtimber Hill SSSI citation: http://www.sssi.naturalengland.org.uk/citation/citation_photo/1000374.pdf

DRAFT

Option 1a: Housing-led approach to redevelopment of the site, delivering 350 homes**Option 1b: Housing-led approach to redevelopment of the site, delivering 600 homes****Option 2: Employment-led approach to redevelopment of the site, focused on 'B' uses, with 80% B uses and 20% A, C1 and D uses****Option 3: Leisure / tourism-led approach to redevelopment of the site, focused on 'A', 'C1' and 'D' uses, 80% A, C1 and D uses and 20% B uses**

SA theme	Discussion of potential effects and relative merits of options	Rank of preference, options			
		1a	1b	2	3
Cultural Heritage	<p>In relation to designations in the area, Cross Dyke on Beeding Hill Scheduled Monument is located on the northern boundary of the site. The site is also located approximately 800m from the shrunken medieval settlement at Old Erringham Scheduled Monument, which is located to the south of the site.</p> <p>As discussed under the Landscape SA theme, the former uses at the site currently have a significant effect on landscape quality in the area, with associated effects on the setting of the historic environment. In this context there is considerable opportunity for development at this location to lead to significant improvements in the character of the area. Development also offers opportunities for recognising and conserving the intrinsic cultural heritage value of some of the buildings and structures of the disused cement works; however it should be noted that there is uncertainty as to their value.</p> <p>Of the two housing options, Option 1a, has a lesser impact due to its smaller land take. Option 2 is likely to have the most impact due to the typical design, layout and operational use of B uses. .</p> <p>However, impacts under any of the options are possible, and depend on the design and layout of any new development, the retention of distinct features / buildings contributing to local character and historic environment, the location of development in relation to key viewpoints in the area, and the integration of high quality green infrastructure provision.</p>	1	1	1	1
Cultural Activity	<p>Option 3, through promoting D uses, provides significant opportunity for development at the site to deliver uses which will support cultural activity and recreational activities. It also provides additional scope for promoting tourism and the visitor economy through making provision for visitor accommodation and leisure/tourism uses, and enabling provision for training and educational opportunities. This will support the Purposes of the National Park. In relation to the other options, the development of the site exclusively as housing will preclude alternative uses and limit opportunities for supporting cultural and recreational activities. Option 2 will enable an element of these uses, but the dominant B type uses proposed through this option may undermine the offer of the site for cultural activities, educational/training uses or the visitor economy. In relation to the housing options, the delivery of increased levels of housing through Options 1b has increased potential to lead to impacts which limits the area's attractiveness to visitors and undermine the use of the site for uses which proactively support and complement the National Park's Purposes.</p>	3	4	2	1

DRAFT

Option 1a: Housing-led approach to redevelopment of the site, delivering 350 homes**Option 1b: Housing-led approach to redevelopment of the site, delivering 600 homes****Option 2: Employment-led approach to redevelopment of the site, focused on 'B' uses, with 80% B uses and 20% A, C1 and D uses****Option 3: Leisure / tourism-led approach to redevelopment of the site, focused on 'A', 'C1' and 'D' uses, 80% A, C1 and D uses and 20% B uses**

SA theme	Discussion of potential effects and relative merits of options	Rank of preference, options			
		1a	1b	2	3
Health and Wellbeing	Option 3 has most potential to offer uses (including D1 uses) and enhance uses of existing attractions (including the South Downs Way) which will support leisure and recreational activities with benefits for health and wellbeing. The site currently has poor access to services and facilities, as well as public transport networks. As such a housing-led development (as proposed by Options 1a-b) would undermine health and wellbeing by limiting residents' access to services, facilities and amenities, and encouraging car use.	3	4	2	1
Vitality of Communities	Due to the location of the site, the options proposed are unlikely to lead to significant effects on the vitality of existing settlements, with the possible exception of localised benefits to Upper Beeding. In terms of the housing-led options, again due to its location, these options are unlikely to facilitate the vitality of communities.	3	3	2	1
Accessibility	The site currently has poor access to services and facilities, as well as public transport networks. In this context the site is located at distance from local services, facilities and amenities, with the nearest located 2-3km away at Upper Beeding and Steyning. As such a housing-led development (as proposed by Options 1a-b) would undermine residents' access to amenities. It is also likely that, given the level of development proposed, the housing options would not deliver sufficient housing to support significant on-site community facilities. The uses promoted by Option 2 and 3 would be more appropriate in terms of access requirements. This is due to the site's proximity to the A283, and its associated suitability for goods vehicle movements, and/or its accessibility as a visitor or leisure/recreational facility.	3	4	2	1
Sustainable Transport	The site is located away from main public transport routes. Whilst new public transport linkages can be provided with new development, it is likely that the housing-led options would encourage a large degree of car use and dependency, given the site's lack of proximity to existing services, facilities and amenities. However, Option 2, which focuses on B uses, has the potential to stimulate HGV and LGV movements. Option 3 also has the potential to stimulate car use and increase traffic flows. However the uses delivered through Option 3, including, potentially, leisure, recreation and visitor uses, has increased scope for encouraging and facilitating the use of sustainable transport modes. In this context it is likely that the uses promoted through Option 3 would provide increased scope for sustainable transport use given the uses' access requirements.	3	3	2	1

DRAFT

Option 1a: Housing-led approach to redevelopment of the site, delivering 350 homes**Option 1b: Housing-led approach to redevelopment of the site, delivering 600 homes****Option 2: Employment-led approach to redevelopment of the site, focused on 'B' uses, with 80% B uses and 20% A, C1 and D uses****Option 3: Leisure / tourism-led approach to redevelopment of the site, focused on 'A', 'C1' and 'D' uses, 80% A, C1 and D uses and 20% B uses**

SA theme	Discussion of potential effects and relative merits of options	Rank of preference, options			
		1a	1b	2	3
Housing	Options 1a-b would help meet affordable housing needs in the National Park. However, it is unlikely that this location would be most appropriate for housing in terms of access to services and facilities. This has been discussed under the other SA themes. Options 2 and 3, through focusing on A to D land use classes, would not deliver significant housing at the site, and as such would do less to help meet affordable housing needs in the National Park.	2	1	3	3
Climate Change Mitigation	Based on national and regional trends, in terms of greenhouse gas emissions, road transport is an increasingly significant contributor to emissions. The extent to which new development through each option has the potential to support climate change mitigation through facilitating a reduced level of car dependency is therefore dependent on the provision of new sustainable transport links and infrastructure, It is likely that a housing-led option would lead to a high degree of car use and dependency given the site's lack of proximity to existing services, facilities and amenities. This will increase greenhouse gas emissions from transport. However Option 2, which focuses on B uses, has the potential to stimulate significant greenhouse gas emissions from HGV and LGV uses, as well as directly from employment uses. Option 3 also has the potential to stimulate traffic flows from the uses proposed, with implications for greenhouse gas emissions. However these uses, including potentially, leisure, recreation and visitor uses, have increased scope for encouraging and facilitating the use of lower emission transport choices. The site has significant potential for renewable energy provision to be included within new development proposals. However, prior to detailed masterplanning, it is difficult to come to a conclusion as to the likely level of greenhouse gas emissions likely to emanate from the options for the site with regards to renewable energy provision.	2	3	4	1
Economy	Options 2 and 3 have the most potential of the options to support the rural economy through promoting employment uses at the site. However, Option 3, through focusing on A, C1 and D uses, has increased potential to support a range of activities relating to the visitor and tourism economy. This includes visitor accommodation uses, and opportunities to make use of the key attractions, such as the South Downs Way, and the wider offer of the National Park. The option also has the potential to support activities related to local food and drink, and other activities associated with the National Park, which in turn will support existing and growing sectors of the rural economy of the SDNP.	3	3	2	1

DRAFT

Option 1a: Housing-led approach to redevelopment of the site, delivering 350 homes

Option 1b: Housing-led approach to redevelopment of the site, delivering 600 homes

Option 2: Employment-led approach to redevelopment of the site, focused on 'B' uses, with 80% B uses and 20% A, C1 and D uses

Option 3: Leisure / tourism-led approach to redevelopment of the site, focused on 'A', 'C1' and 'D' uses, 80% A, C1 and D uses and 20% B uses

SA theme	Discussion of potential effects and relative merits of options	Rank of preference, options			
		1a	1b	2	3
Summary	<p>In relation to the housing options (Options 1a and-b), the site's relative distance from existing services and facilities and the site's poor accessibility to public transport networks will encourage a significant degree of car use and dependency. The limited size of housing delivery facilitated through these options is also unlikely to support the provision of a broad range of amenities. Therefore, while the options will help meet housing need in the National Park, the options perform poorly in against many of the SA Objectives.</p> <p>Whilst Option 2 has the potential to support economic growth through significant employment provision, the option has the potential to lead to significant increases in commuter traffic in the vicinity and has less potential to support improvements to the landscape character. It will also limit opportunities to facilitate development types which support the purposes of the National Park</p> <p>Overall Option 3 has the potential to provide the broadest range of sustainability benefits for the National Park. This includes in relation to: enhancing opportunities for recreation and leisure, with associated benefits for health and wellbeing; promoting sustainable transport use; supporting the wider economic vitality of the National Park, including the visitor economy; and increasing cultural activity. The option also recognises the existing constraints relating to the site's distance from existing services and facilities and of the site's poor accessibility to public transport networks.</p> <p>All of the options have the potential to have impacts on landscape character, biodiversity and the historic environment. In this context, potential effects depend on the design and layout of new development, the retention of distinct features contributing to local character, and elements such as the integration of high quality green infrastructure provision.</p>	3	4	2	1

DRAFT

3.3.1 Why has the preferred approach for the Shoreham Cement Works been chosen?

The SDNPA has considered that given the significant negative visual impact the site has on the National Park and the complexity of delivering any development, its preferred approach is to seek a mixed use development which delivers a significantly enhanced landscape and uses compatible with the purposes of the National Park, namely tourism / visitor based recreational activities and employment uses.

In addition, the preferred approach also seeks to resist 'more development than is necessary to secure and deliver the environmentally-led restoration of the site'. In this context the preferred approach will help to both protect and support enhancements to the landscape character, biodiversity, and cultural heritage.

To help achieve this the SDNPA is proposing to produce an Area Action Plan (AAP), which will also be accompanied by its own SA process. This approach will help to ensure the numerous opportunities for a high quality and sustainable development are realised and any potential negative effects are avoided and mitigated.

3.4 Appraisal of alternative approaches to delivering affordable housing

Defra's National Parks Vision and Circular states that National Parks are not suitable locations for unrestricted housing development but that National Park Authorities have an important role to play as planning authorities in the delivery of affordable housing. As such the expectation is that new housing will be focused on meeting affordable housing requirements in the National Park.

The small sites affordable housing contributions policy was introduced by the UK Government in November 2014 to help boost housing delivery and incentivise brownfield development. It introduced a national threshold of ten units or fewer (and a maximum combined gross floor space of no more than 1,000 square metres) beneath which affordable housing contributions should not be sought. Within National Parks, the exemptions would apply only to developments not exceeding 5 new homes; developments of 6 to 10 homes could pay a commuted sum, either at or after completion of the development. The policy was introduced to address the burden of developer contributions on small scale developers, custom and self-builders.

Given affordable housing need in the National Park, as reflected by the SHMA's suggestion that 294 affordable dwellings a year are required in the SDNP, the National Park Authority are keen to consider a policy which would deliver an increased level of affordable housing on smaller sites. This is with a view to potentially increasing the delivery of affordable housing on smaller sites, which would enable in many cases affordable housing development to take place on available sites in smaller settlements

In light of these elements, the SA process has considered two options, with a view to exploring the sustainability implications of different approaches to affordable housing delivery in the National Park.

These are as follows:

- **Option 1:** Affordable housing policy which applies national policy, namely that within the National Park, affordable housing exemptions would apply only to developments comprising 5 new homes or fewer, and developments of 6 to 10 homes pay a commuted sum, either at or after completion of the development, and sites of 11 or more units to provide a minimum 40% affordable housing to reflect the Preferred Options approach;
- **Option 2:** A tailored affordable housing policy for the National Park, which seeks to strengthen affordable housing requirements for smaller sites. This approach seeks on-site affordable housing from a threshold which is lower than the 6 dwellings advised in Planning Practice

DRAFT

Guidance, and larger sites (threshold circa 11 units) to provide a minimum 50% affordable housing.

The following table presents appraisal findings in relation to the two options introduced above. These are organised by the twelve SA themes.

For each SA theme, a commentary on the likely effects is presented. Options are also ranked numerically reflecting their relative sustainability performance, with '1' the most favourable ranking and '2' the least favourable ranking.

DRAFT

Table 3.11: Appraisal of affordable housing options

Option 1: Affordable housing policy which applies national policy for sites of ten new homes or fewer, and the Preferred Options approach for sites over 11 homes.

Option 2: A tailored affordable housing policy for the National Park, which seeks to strengthen affordable housing requirements for smaller sites.

SA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt 1	Opt 2
Landscape	Impacts under either option is possible, and depends on the design and layout of new development, the location of development in relation to key viewpoints the area, and the integration of high quality green infrastructure provision. However, if all housing provision- including affordable housing- is appropriately located, and design and layout is sensitive to landscape character, then there should be no difference between the two options in terms of landscape impacts.	?	?
Climate Change Adaptation	In relation to flood risk, it is not possible to differentiate between the options given this depends on the location of development and the incorporation of mitigation measures such as sustainable urban drainage systems (SuDS). It is also considered that the provisions of the NPPF and national policy will help guide development away from flood risk areas and ensure that appropriate mitigation measures are implemented. In terms of the wider elements relating to climate change, this also depends on the provision of appropriate infrastructure alongside new housing, such as GI provision, and appropriate design and layout.	?	?
Biodiversity	The significance of effects depends on the design and layout of new development and the integration of infrastructure which supports ecological networks in the area. As such, if all housing provision- including affordable housing- seeks to integrate these elements, then there should be no difference between the options in terms of impacts on biodiversity and ecological networks.	?	?
Cultural Heritage	It is not possible to differentiate the options in terms of potential effects on the historic environment. Effects depend on the design and layout of new development, the retention of distinct features contributing to local character, the location of development in relation to key viewpoints in the area, and the integration of high quality green infrastructure provision. If all housing provision- including affordable housing- is appropriately located, and design and layout is sensitive to local character, then there should be no difference between the two options in terms of impacts on the historic environment.	?	?
Cultural Activity	The implementation of a more consolidated approach to affordable housing provision through Option 2 has the potential to have particular benefits for affordable housing provision in smaller settlements, where available sites tend to be of a more limited size. As such, Option 2, through facilitating an increased level of affordable housing provision in smaller settlements in the National Park, has increased potential to support the vitality of these settlements by facilitating the provision of housing for a broader range of groups and ages. This will support cultural activities in these settlements.	2	1
Health and Wellbeing	Option 2, through enabling an increased number of residents to find affordable housing and remain locally, will reduce the need to travel for existing employment and amenities. The option will also support community cohesion through helping to meet local housing needs and reinforcing existing social networks. Through these benefits, the option therefore has increased potential to support the physical and mental health and wellbeing of existing residents.	2	1

DRAFT

Option 1: Affordable housing policy which applies national policy for sites of ten new homes or fewer, and the Preferred Options approach for sites over 11 homes.

Option 2: A tailored affordable housing policy for the National Park, which seeks to strengthen affordable housing requirements for smaller sites.

SA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt 1	Opt 2
Vitality of Communities	Option 2 has the potential to have particular benefits for affordable housing provision in smaller settlements, where available sites tend to be of a more limited size. This will support the vitality of smaller settlements by facilitating the provision of housing for a broader range of groups and ages, and supporting community cohesion through helping to meet local housing needs and reinforcing existing social networks.	2	1
Accessibility	Option 2 will enable an increased level of affordable housing provision in the National Park, particularly in smaller settlements and rural areas. This will enable an increased number of existing residents to find affordable housing and remain locally, supporting accessibility to current employment and social networks.	2	1
Sustainable Transport	Option 2 has the potential to facilitate an increased number of affordable houses in smaller settlements, where available sites tend to be of a more limited size. Whilst these settlements tend to be more poorly served by public transport networks, this will also help people live closer to employment and social networks, reducing the need to travel. Overall however there is unlikely to be a significant differentiation between the options in relation to this SA theme.	?	?
Housing	Option 2 will help boost provision of affordable housing on new development sites by increasing the affordable housing requirements for smaller sites. This will help the delivery of affordable housing in the National Park. The option also has the potential to have particular benefits for affordable housing provision in smaller settlements, where available sites tend to be of a more limited size.	2	1
Climate Change Mitigation	The provision of an additional level of affordable housing through Option 2 is unlikely to lead to significant effects on greenhouse gas emissions if energy efficiency measures are integrated within all types of housing provision.	?	?
Economy	The implementation a more far-reaching approach to affordable housing provision through Option 2 has the potential to have particular impacts on affordable housing provision in smaller settlements, where available sites tend to be of a more limited size. This will support the vitality of smaller settlements by facilitating the provision of housing for a broader range of groups and ages, with benefits for the rural economy. Through encouraging an increased provision of affordable housing in smaller settlements, Option 2 will also support the availability of the rural workforce in key sectors such as agriculture, forestry and leisure/recreation.	2	1
Summary	Option 2, will, in comparison to Option 1, increase the level of affordable housing provision in the smaller settlements of the National Park where available sites tend to be of a more limited size. This will support the vitality of smaller settlements and rural areas through facilitating the provision of housing for a broader range of groups and ages. The option will also support the quality of life of existing residents through enhanced affordable housing provision and enabling them to remain locally, supporting accessibility to current employment and social networks. Option 2 will also do more to support the rural economy by enhancing the availability of the rural workforce in key sectors such as agriculture, forestry and leisure/recreation. In terms of landscape character, the historic environment, climate change adaptation and mitigation and biodiversity, it is not possible to differentiate between the options.		

4. Development of the planning policies for the South Downs Local Plan

The planning policies for the Local Plan have been developed in line with Government policy, particularly the National Planning Policy Framework (2012) and the Vision and Circular on English National Parks and the Broads (2010), building upon the Partnership Management Plan and the State of the Park Report, evidence base studies, the appraisal of reasonable alternatives undertaken through the SA process and to reflect consultation responses on plan-making to date. This includes the Issues and Options consultation undertaken for the Local Plan in 2014, and consultation on the *Local Plan Preferred Options* undertaken in September 2015.

An initial version of the Local Plan planning and allocation policies was presented in the *Local Plan Preferred Options* document. These policies were appraised through the SA process and findings presented in the SA Report accompanying the consultation¹⁸. At this stage, the SA Report set out a number of recommendations designed to enhance the sustainability performance of the Local Plan policies, as follows:

- Policy SD-DS03, Land at Hoe Court, Lancing: The development should be restricted to a discreet area to the rear of existing development that will limit the impacts on views and landscape.
- Policy SD-WW05, Land at Lamberts Lane, Midhurst: The proposed allocation will lead to the loss of community facilities. Whilst the policy seeks to ensure that it is “demonstrated that there is no loss in community facilities” there is further scope for it to set out how this will be achieved, such as through ensuring that the loss of community facilities on site is matched by new community facilities on site or elsewhere in Midhurst.
- Policy SD-WW09: Land at Clements Close, Binsted: There is scope for the policy to further acknowledge the presence of the Upper Greensand Hangers SSSI, part of which has been designated as the East Hampshire Hangers SAC.
- Include a requirement in the design policy (SD6) that development proposals incorporate ‘Secured By Design’ principles.
- Expand policy SD23 Housing to specifically address provision of housing designed to meet the objectively assessed needs of older people.
- Make explicit reference to meeting the need for health services as part of policies SD53 New and Existing Community Infrastructure and SD54 Supporting Infrastructure for New Development.

The policies and site allocations in the Local Plan were then revisited in 2016 and early 2017 to reflect comments received on the Preferred Options consultation, the findings of new and updated evidence base studies and the findings and recommendations of the SA process.

The 97 policies presented in the current *South Downs Local Plan Pre-Submission* document, which incorporate 41 site allocation policies, are as follows:

- Core Policy SD1: Sustainable Development
- Core Policy SD2: Ecosystems Services
- Core Policy SD3: Major Development
- Strategic Policy SD4: Landscape Character

¹⁸ AECOM (September 2015) SA of the South Downs Local Plan: SA Report to accompany the Local Plan Preferred Options https://www.southdowns.gov.uk/wp-content/uploads/2015/09/SDLP_PO_SA-Report_v-7-0_260815.pdf

DRAFT

- Strategic Policy SD5: Design
- Strategic Policy SD6: Safeguarding Views
- Strategic Policy SD7: Relative Tranquillity
- Strategic Policy SD8: Dark Night Skies
- Strategic Policy SD9: Biodiversity and Geodiversity
- Strategic Policy SD10: International Sites
- Development Management Policy SD11: Trees, Woodland and Hedgerows
- Strategic Policy SD12: Historic Environment
- Development Management Policy SD13: Listed Buildings
- Development Management Policy SD14: Climate Change Mitigation and Adaptation of Historic Buildings
- Development Management Policy SD15: Conservation Areas
- Development Management Policy SD16: Archaeology
- Strategic Policy SD17: Protection of the Water Environment
- Development Management Policy SD18: The Open Coast
- Strategic Policy SD19: Transport and Accessibility
- Strategic Policy SD20: Walking, Cycling and Equestrian Routes
- Development Management Policy SD21: Public Realm, Highway Design and Public Art
- Development Management Policy SD22: Parking Provision
- Strategic Policy SD23: Sustainable Tourism
- Development Management Policy SD24: Equestrian Uses
- Strategic Policy SD25: Development Strategy
- Strategic Policy SD26: Supply of Homes
- Strategic Policy SD27: Mix of Homes
- Strategic Policy SD28: Affordable Homes
- Strategic Policy SD29: Rural Exception Sites
- Development Management Policy SD30: Replacement Dwellings
- Development Management Policy SD31: Extensions to existing dwellings, and provision of annexes and outbuildings
- Development Management Policy SD32: New Agricultural and Forestry Workers Dwellings
- Strategic Policy SD33: Gypsies and Travellers and Travelling Showpeople
- Strategic Policy SD34: Sustaining the Local Economy
- Strategic Policy SD35: Employment Land

DRAFT

- Strategic Policy SD36: Town and Village Centres
- Development Management Policy SD37: Development in Town and Village Centres
- Development Management Policy SD38: Shops outside Centres
- Development Management Policy SD39: Agriculture and Forestry
- Development Management Policy SD40: Farm Diversification
- Development Management Policy SD41: Conversion of Redundant Agricultural or Forestry Buildings
- Strategic Policy SD42: Infrastructure
- Development Management Policy SD43: New and Existing Community Facilities
- Development Management Policy SD44: Telecommunications and Utilities Infrastructure
- Strategic Policy SD45: Green Infrastructure
- Development Management Policy SD46: Provision and Protection of Open Space, Sport and Recreational Facilities and burial grounds/cemeteries
- Development Management Policy SD47: Local Green Spaces
- Strategic Policy SD48: Climate Change and Sustainable Use of Resources
- Strategic Policy SD49: Flood Risk Management
- Development Management Policy SD50: Sustainable Drainage
- Development Management Policy SD51: Renewable Energy
- Development Management Policy SD52: Shop Fronts
- Development Management Policy SD53: Adverts
- Development Management Policy SD54: Pollution and Air Quality
- Development Management Policy SD55: Contaminated Land
- Strategic Site Policy SD56: Shoreham Cement Works
- Strategic Site Policy SD57: North Street Quarter and adjacent Eastgate area, Lewes
- Allocation Policy SD58: Former Allotments, Alfriston
- Allocation Policy SD59: Kings Ride, Alfriston
- Allocation Policy: SD60: Land at Clements Close, Binsted
- Allocation Policy SD61: New Barn Stables, The Street, Binsted
- Allocation Policy SD62: Land at Greenway Lane, Buriton
- Allocation Policy SD63: Land South of the A272 at Hinton Marsh, Cheriton
- Allocation Policy SD64: Land South of London Road, Coldwaltham
- Allocation Policy SD65: Land East of Warnford Road, Corhampton
- Allocation Policy SD66: Land at Park Lane, Droxford

DRAFT

- Allocation Policy SD67: Cowdray Works Yard, Easebourne
- Allocation Policy SD68: Land at Egmont Road, Easebourne
- Allocation Policy SD69: Former Easebourne School, Easebourne
- Allocation Policy SD70: Land behind the Fridays, East Dean (East Sussex)
- Allocation Policy SD71: Land at Elm Rise, Findon
- Allocation Policy SD72: Soldiers Field House, Findon
- Allocation Policy SD73: Land at Petersfield Road, Greatham
- Allocation Policy SD74: Land at Fern Farm, Greatham
- Allocation Policy SD75: Half Acre, Hawkley
- Allocation Policy SD76: Land at Itchen Abbas House, Itchen Abbas
- Allocation Policy SD77: Land at Castelmer Fruit Farm, Kingston near Lewes
- Allocation Policy SD78: The Pump House, Kingston
- Allocation Policy SD79: Land at Old Malling Farm, Lewes
- Allocation Policy SD80: Malling Brooks, Lewes
- Strategic Allocation Policy SD81: West Sussex County Council Depot and former Brickworks site, Midhurst
- Strategic Allocation Policy SD82: Holmbush Caravan Park, Midhurst
- Allocation Policy SD83: Land at the Fairway, Midhurst
- Allocation Policy SD84: Land at Lamberts Lane, Midhurst
- Allocation Policy SD85: Land at Park Crescent, Midhurst
- Allocation Policy SD86: Offham Barns, Offham
- Allocation Policy SD87: Land at Church Lane, Pyecombe
- Allocation Policy SD88: Land at Ketchers Field, Selborne
- Allocation Policy SD89: Land at Pullens Lane, Sheet
- Allocation Policy SD90: Land at Loppers Ash, South Harting
- Allocation Policy SD91: Land North of the Forge, South Harting
- Allocation Policy SD92: Stedham Sawmill, Stedham
- Allocation Policy SD93: Land South of Church Road, Steep
- Allocation Policy SD94: Land at Ramsdean Road, Stroud
- Allocation Policy SD95: Land South of Heather Close, West Ashling
- Allocation Policy SD96: Land at Long Priors, West Meon

The latest version of the planning policies presented in the current *South Downs Local Plan Pre-Submission* document has been appraised in Part 2 of this SA Report.

DRAFT

This page is intentionally blank.

Part 2:
**What are the SA findings
at this stage?**

5. Appraisal of policy approaches presented in the latest version of the South Downs Local Plan

5.1 Purpose of this chapter

This chapter presents appraisal findings in relation to the current *South Downs Local Plan Pre-Submission* document. This includes relating to the policies for site allocations, the in-combination effects of plan policies and cumulative effects of the Local Plan with other plans and policies in the wider sub-region.

5.2 Appraisal of policies for site allocations

5.2.1 Approach to the appraisal of the strategic sites and site allocations

The current version of the Local Plan allocates 41 sites for housing and employment.

To support the current consultation, the SA process has undertaken an appraisal of the key constraints present at each of these sites, the proposed policy approaches for the sites and potential effects that may arise. In this context the sites have been considered in relation to the SA Framework of objectives and decision making questions developed during SA scoping and the baseline information.

The detailed findings of the appraisal are presented in **Appendix E**. A summary of the appraisal is presented below.

Table 5.1: Summary of the appraisal of sites allocations proposed through the Pre-Submission consultation Local Plan

Site	Landscape	Climate Change Adaptation	Biodiversity	Cultural Heritage	Cultural Activity	Health and Wellbeing	Vitality of Communities	Accessibility	Sustainable Transport	Housing	Climate Change Mitigation	Local Economy	Significant effects?
SD56: Shoreham Cement Works	+	+	+	+	+	+		?	+		-	+	Y
SD57: North Street Quarter and adjacent Eastgate area, Lewes	+	+	?	+	+	+	+	+	+	+	-	+	Y
SD58: Former Allotments, Alfriston	?	?	?	?		?	+	+	?	+	-	+	N
SD59: Kings Ride, Alfriston	?		+				+	+	?	+	-	+	N
SD60: Land at Clements Close, Binsted			?				+	?	?	+	-	+	Y
SD61: New Barn Stables, The Street, Binsted			?					?	-	+	-		N
SD62: Land at Greenway Lane, Buriton	?						+	+	+	+	-	+	N
SD63: Land South of the A272 at Hinton Marsh, Cheriton	?		?				+	+	?	+	-	+	Y
SD64: Land South of London Road, Coldwaltham	-		?				+	?	?	+	-	+	N
SD65: Land East of Warnford Road, Corhampton	Site has gained planning consent so not appraised												

DRAFT

Site	Landscape	Climate Change Adaptation	Biodiversity	Cultural Heritage	Cultural Activity	Health and Wellbeing	Vitality of Communities	Accessibility	Sustainable Transport	Housing	Climate Change Mitigation	Local Economy	Significant effects?
SD66: Land at Park Lane, Droxford	?			?			+	?	?	+	-	+	N
SD67: Cowdray Works Yard, Easebourne	?		+	?	+		+	+	+	+	-	+	N
SD68: Land at Egmont Road, Easebourne	?			?		+	+	+	+	+	-	+	N
SD69: Former Easebourne School, Easebourne	?		+	?			+	+	+	+	-	+	N
SD70: Land behind the Fridays, East Dean (East Sussex)	Site has gained planning consent so not appraised												
SD71: Land at Elm Rise, Findon	?		+				+	+	+	+	-	+	N
SD72: Soldiers Field House, Findon	?	?	+				+	+	+	+	-	+	N
SD73: Land at Petersfield Road, Greatham	?		?	?			+	+	?	+	-	+	N
SD74: Land at Fern Farm, Greatham	?		?					+	?	+	-		N
SD75: Half Acre, Hawkley	?		+					-	?	+	-		N
SD76: Land at Itchen Abbas House, Itchen Abbas	?		?			?	+	+	+	+	-	+	N
SD77: Land at Castelmer Fruit Farm, Kingston near Lewes	?		?			+	+	+	?	+	-	+	N
SD78: The Pump House, Kingston			?					?	?	+	-		N
SD79: Land at Old Malling Farm, Lewes	-	?	?	-		+	+	?	?	+	-	-	Y
SD80: Malling Brooks, Lewes	Site has gained planning consent so not appraised												
SD81: West Sussex County Council Depot, Midhurst			+	+			+	+	?	+	-		N
SD82: Holmbush Caravan Park, Midhurst	?	?	?				+	+	+	+	-		N
SD83: Land at the Fairway, Midhurst			?	+			+	+	?	+	-		N
SD84: Land at Lamberts Lane, Midhurst	?			?		?	+	+	+	+	-		N
SD85: Land at Park Crescent, Midhurst	?			?			+	+	+	+	-	+	N
SD86: Offham Barns, Offham	?							+	+	+	-		N
SD87: Land at Church Lane, Pyecombe	Site has gained planning consent so not appraised												
SD88: Land at Ketchers Field, Selborne	?	+	?	?			+	+	?	+	-	+	N
SD89: Land at Pullens Lane, Sheet	?		?	?		+	+	?	?	+	-	+	N

DRAFT

Site	Landscape	Climate Change Adaptation	Biodiversity	Cultural Heritage	Cultural Activity	Health and Wellbeing	Vitality of Communities	Accessibility	Sustainable Transport	Housing	Climate Change Mitigation	Local Economy	Significant effects?
SD90: Land at Loppers Ash, South Harting	?			?		+	+	?	+	-	+		N
SD91: Land North of the Forge, South Harting	?	?		?		+	+	?	+	-	+		N
SD92: Stedham Sawmill, Stedham	+		?	?		+	+	?	+	-	+		N
SD93: Land South of Church Road, Steep	?		?	?		+	+	-	+	-	+		N
SD94: Land at Ramsdean Road, Stroud	?		+	?		+	+	?	+	-	+		N
SD95: Land South of Heather Close, West Ashling	?		?			+	+	?	+	-	+		Y
SD96: Land at Long Priors, West Meon	?					+	?	?	+	-	+		N

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

As highlighted by the appraisal findings in the table above and **Appendix E**, allocations at a number of the sites have the potential to lead to significant effects. These are as follows:

Strategic Site Policy SD56: Shoreham Cement Works

The policy has the potential to lead to significant positive effects on landscape quality, the setting of the historic environment, the rural economy (including the tourism and visitor economy) and cultural activity. With appropriate planning for green infrastructure networks, there is also the potential for significant biodiversity enhancements to take place. No significant negative effects are anticipated.

Strategic Site Policy SD57: North Street Quarter and adjacent Eastgate area, Lewes

Through helping to address flood risk in the area, the policy will support significant positive effects for climate change adaptation in this part of Lewes. The policy will also support significant positive effects on townscape quality, the vitality of the area, accessibility and the historic environment.

Policy SD60: Land at Clements Close, Binsted

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.

Policy SD64: Land South of London Road, Coldwaltham

Given the high landscape sensitivity of the northern part of the site, the allocation has the potential to have significant effects on landscape quality. However, this will be mitigated by the comprehensive landscape and design strategy required under policy criterion SD64 2b.

DRAFT**Policy SD79: Land at Old Malling Farm, Lewes**

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 delivery of 240 houses (of which 50% are affordable) will have a significant contribution to meeting local housing need.

Land South of Heather Close, West Ashling

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

5.3 Appraisal of the Pre-Submission Local Plan Policies

5.3.1 Approach to the appraisal

The appraisal of the Strategic Policies and Development Management Policies in the *Pre-Submission* document has been presented under the twelve SA Themes. In undertaking the appraisal, the proposed policies were reviewed to determine which are likely to have a positive or negative environmental effect under each SA Theme. For example, Policy SD52: Shop Fronts is unlikely to have any effect on biodiversity in the National Park and therefore has not been considered under this theme.

Where a causal link between policies and SA Themes is established, significant effects are identified through the judgement of the consultants with reference to the evidence base (i.e. the scoping and other relevant information). The appraisal uses the criteria in Schedule 1 of the SEA Regulations, that is:

- the probability, duration, frequency and reversibility of the effects;
- the cumulative nature of the effects;
- the transboundary nature of the effects;
- the risks to human health or the environment (for example, due to accidents);
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- the value and vulnerability of the area likely to be affected due to-
 - special natural characteristics or cultural heritage;
 - exceeded environmental quality standards or limit values; or
 - intensive land-use; and
- the effects on areas or landscapes which have a recognised national, community or international protection status.

Where likely significant effects have been identified, these are described in summary tables for each SA Theme.

DRAFT

Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the *Pre-Submission* document. The ability to predict effects accurately is also affected by the limitations of the baseline data. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure assumptions are explained in full.¹⁹ In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) of policies in more general terms.

5.3.2 Landscape

Potential effects on landscape in the National Park from the Local Plan are of paramount importance given the designation, its Purposes and Duty and its special qualities. This is reflected throughout the policies in the Pre-Submission consultation version of the plan, which have a close focus on protecting and enhancing landscape character in the National Park.

As discussed in the previous section, the site allocation policies all have a close focus on protecting and enhancing landscape character, and securing design and layout which support the particular Special Qualities of the National Park. The development strategy for the Local Plan also, as discussed above, does not seek to meet OAN in the National Park. Instead the Local Plan presents a capacity based housing figure, a key element of which was determined through detailed landscape studies for each potential allocation. As such the development strategy has been led in part through a landscape-based approach which seeks to minimise impacts on character.

Key strategic and development policies with likely direct effects on supporting landscape character in the National Park include SD4 Landscape Character, SD6 Safeguarding Views, SD7 Relative Tranquillity, SD8 Dark Night Skies and SD18 The Open Coast. Through their emphasis both on conservation and also on the enhancement of landscape character, these policies will result not only in significant positive effects on landscape character but also on the tranquillity and dark night skies which make the National Park a special place. This will be supported by the policies which: promote high quality design and layout of new development (including SD5 Design, SD21 Public Realm, Highway Design and Public Art, SD29 Rural Exception Sites, SD30: Replacement Dwellings, SD31: Extensions to existing dwellings, and provision of annexes and outbuildings, New Agricultural and Forestry Workers Dwellings and SD52 Shop Fronts); seek to conserve and enhance the historic environment (SD12 Historic Environment, SD13 Listed Buildings, SD15 Conservation Areas) and which support green infrastructure enhancements (SD45 Green Infrastructure, SD46 Provision and Protection of Open Space, Sport and Recreational Facilities and Burial Grounds/Cemeteries and SD47 Local Green Spaces.

These effects are supported by other positive effects from further policies that may indirectly have positive effects on landscape. For example, SD9 (Biodiversity and Geodiversity), through protecting and enhancing habitats and ecological networks, both within and outside of designated sites, should indirectly support landscape character through reinforcing biodiversity value and the contribution of habitats and species to the character of the countryside and landscape. Similarly, policy SD17 (Rivers and Watercourses) should have indirect positive effects on this theme through supporting enhancements to these key elements of the landscape. Whilst the policy approaches safeguarding railway and canal corridors (e.g. the Lewes-Uckfield railway and the Wey and Arun Canal) will initially have a largely neutral impact on landscape character in the short term, in the longer term, they will support the protection of these key landscape features through precluding development which leads to their loss.

Core Policy SD2 (Ecosystems Services) will directly and indirectly support landscape character in the SDNP. Through increasing the resilience of the National Park's natural environment to change, and seeking to supporting services, provisioning services, regulating services and cultural services, the policy will support a landscape-scale approach to environmental protection and enhancement. This

¹⁹ As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pagelid=156210>): "Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."

DRAFT

will enable landscape character both to be protected and evolve in a way which will enhance its capacity to support the Special Qualities of the National Park. This will also help the landscape of the National Park adapt to the likely impacts of climate change and extreme weather events over the longer term through promoting a landscape-level ecological approach.

Policy SD25 Development Strategy's focus on previously developed land, its aim to support the efficient and appropriate use of land, and its aim to ensure development is of a scale and nature appropriate to the character and function of the settlement within which it sits will also help limit development on greenfield land with the potential to impact on landscape character.

Table 5.2: Likely significant effects: Landscape

<i>Likely significant effect</i>	<i>Effect dimensions</i>	<i>Recommendations / mitigation</i>
Whilst the current Local Plan sets out a range of policies which will protect and enhance landscape character, effects are unlikely to be significant. This is given the protection provided by the existing provisions of the National Park designation.		

5.3.3 Climate Change Adaptation

The National Park's geography, its coastline and its environmental sensitivities highlights the requirement for it to adapt to a changing climate over the next 50-100 years, including extreme weather events. The Natural Environment White Paper recognises that green infrastructure is '*one of the most effective tools available*' to manage '*environmental risks such as flooding and heat waves.*' In this context Policy SD45 (Green Infrastructure) seeks to ensure that new development maintains and enhances green infrastructure provision, new provision is facilitated and enhanced links to existing green infrastructure resource is provided. The policy also seeks to ensure that green infrastructure provision is geared towards adapting and improving resilience to climate change. This will be further supported by SD46 (Provision and Protection of Open Space, Sport and Recreational Facilities and Burial Grounds/Cemeteries) which sets out provisions for protecting and delivering new open space alongside new development, and SD47 Local Green Spaces, which allocates over 40 areas as Local Green Space. This will be further supported by the biodiversity policies (Policies SD9-11), SD17 (Protection of the Water Environment) and the site allocations, which provide a strong focus on enhancing green infrastructure networks. In addition to helping enhance the resilience of the National Park to the effects of climate change, such as more extreme weather events, drought and increases in flood risk, enhancements to green infrastructure supported by these policies will also support the resilience of ecological networks to the effects of climate change. This will be supported by Policy SD48 seeks to encourage all new development to incorporate sustainable design features which support adaptation to the effects of climate change.

Core Policy SD2 (Ecosystems Services) will also support climate change adaptation in the SDNP. Through increasing the resilience of the National Park's natural environment to change, and seeking to enhance supporting services, provisioning services, regulating services and cultural services, the policy will help the landscape of the National Park adapt to the likely impacts of climate change and extreme weather events over the longer term. This includes through enhancing the resilience of ecological networks, water resources and soils resources, and addressing flood risk. As a key overarching policy for the Local Plan, this will promote adaptation to climate change in the National Park.

Policy SD40 (Flood Risk Management) sets out the Local Plan's approach to flood risk. Broadly in line with national policy, this seeks to limit flood risk through requiring flood risk assessments for all development on sites where identified by the Environment Agency and the outcomes of the SFRA. It also states that '*Proposed flood protection, mitigation and adaptation measures should be supported with a management schedule, the identification of the body responsible for maintenance, and evidence of funding and maintenance in perpetuity.*' This is supported by Policy SD50 (Sustainable Drainage), which further supports this through seeking to ensure development proposals provide

DRAFT

suitable sustainable drainage systems where required by the Lead Local Flood Authority. However, it is considered that this approach is broadly in line with the NPPF and as such is not likely to have significant effects beyond the baseline (i.e. in addition to the NPPF).

Water supply is addressed in a number of discrete policies (e.g. SD26 Gypsies and Travellers and Travelling Showpeople, SD34 North Street Quarter and adjacent Eastgate area, Lewes and SD57 Telecommunications, Services and Utilities). More widely in relation to this topic, it is anticipated that the Water Resources Management Plans prepared by water supply companies will address long-term water supply issues associated with growth.

Table 5.3: Likely significant effects: Climate change adaptation

<i>Likely significant effect</i>	<i>Effect dimensions</i>	<i>Recommendations / mitigation</i>
Increased resilience of the National Park's landscapes to the effects of climate change through enhancements to ecosystems services and green infrastructure enhancements	Direct, long-term, permanent and positive	None recommended

5.3.4 Biodiversity

Policies SD9 (Biodiversity and Geodiversity), SD10 (International Sites) and SD11 (Trees, Woodland and Hedgerows) provide the main focus of the Local Plan's approach to biodiversity, with a number of policies that provide a supporting cast.

Policy SD9 (Biodiversity and Geodiversity) sets out a hierarchy of sites of biodiversity value and a policy approach for each. This is broadly in line with the NPPF and other planning / conservation legislation. However, the policy does widen the scope to consider non-designated sites and habitats. It also seeks to enhance ecological connections, supports the provisions of Biodiversity Action Plans and the aims of Biodiversity Opportunity Areas, seeks to promote native species, and aims to realise opportunities for net gains in biodiversity value. SD10 (International Sites) provides a robust approach to the protection of internationally designated sites in the National Park, which has been reflected by the findings of the Habitats Regulations Assessment (HRA) undertaken to date for the Local Plan.

Ecological networks will further be supported by Policy SD11 (Trees, Woodland and Hedgerows) which sets out a range of provisions for the protection of trees and hedgerows through development proposals, facilitating their replacement where loss occurs, and the planting of new trees. This will be reinforced by the green infrastructure policies, including Policy SD45 (Green Infrastructure), which will support habitats and species and ecological linkages. SD17 (Protection of the Water Environment), which seeks to conserve and enhance the biodiversity value of groundwater and surface water features and watercourse corridors, also recognises the key role of the water environment in the National Park as key habitats and contributors to ecological networks.

Policy SD2 (Ecosystems Services) will also support biodiversity in the National Park by enhancing the resilience of ecological networks through development proposals and enhancing natural habitats and connections.

Overall, reinforced by the site allocation policies, which set out a range of provisions for delivering ecological enhancements alongside development proposals, the SDLP policies provide a solid basis for the protection and enhancement of biodiversity in the National Park.

DRAFT

Table 5.4: Likely significant effects: Biodiversity

<i>Likely significant effect</i>	<i>Effect dimensions</i>	<i>Recommendations / mitigation</i>
Improved ecological connectivity	Direct and indirect, long-term, permanent and positive.	None proposed
Improved ecological resilience	Direct and indirect, long-term, permanent and positive.	None proposed
'Wider' ecological benefits	Direct and indirect, long-term, permanent and positive.	None proposed
Increased habitat and greenspace through GI and enhancing waterways	Direct and indirect, long-term, permanent and positive.	None proposed

5.3.5 Cultural Heritage

The SDNP has a rich cultural heritage and historic environment that should be conserved, enhanced and enjoyed. As discussed under the Landscape SA theme, the Local Plan has a strong focus on protecting and enhancing landscape character in the National Park. This will help protect and enhance natural and historic features which contribute to the distinctive character and pattern of the landscape, and designated landscapes such as historic parkscapes. This will also support the setting of the historic environment assets, improving the context in which they sit.

Policy SD12 (Historic Environment) is a key Local Plan policy relating to the historic environment. This sets out a range of provisions for conserving and enhancing the cultural heritage assets and their settings. This includes a requirement that Heritage Statements are prepared to accompany new development proposals, a focus on rejuvenating underutilised historic environment assets, proposals to secure the future conservation of heritage assets, and further provisions for enhancing the fabric and setting of heritage assets. This will be supported by Policy SD5 (Design), which requires development proposals to make a positive contribution to the character, functions and local distinctiveness of the built environment and landscape through their design, layout, scale and use of locally appropriate materials. It also states that development proposals should take account of the context and setting of settlements. This is supported by the site allocations policies, which have a strong focus on identifying, protecting and enhancing features and areas of historic environment interest, both designated and non-designated.

Policy SD15 (Conservation Areas) sets out a range of provision relating to conservation areas, including through encouraging development proposals which preserve or enhance the special architectural or historic interest, character or appearance of the conservation area, and seeking to ensure that sufficient information is provided to support decisions on planning applications. It also seeks to preclude the loss of buildings and structures within a conservation area where it cannot be clearly demonstrated that the integrity of the conservation area will not be affected and enhancements are secured. This is to be undertaken, where available, through a Conservation Area Appraisal or Management Plan. As such the policy provides a robust approach to supporting the integrity of conservation area designations in the National Park.

In relation to the National Park's rich archaeological resource, Policy SD16: Archaeology sets out a number of provisions for development proposals affecting heritage assets with archaeological and historic interest. This includes provisions for ensuring Heritage Statements are undertaken where appropriate, the preservation of scheduled monuments takes place in situ, and where loss of archaeological features are unavoidable (following the provisions set out by the policy), preservation by record secured through an agreed Written Scheme of Archaeological Investigation will be required. This is supported by the site allocations policies, which, where relevant, have a focus on undertaking

DRAFT

appropriate archaeological surveys to accompany new development proposals, and which seek to ensure the archaeological interest of the site is fully considered during new development activities.

A range of other policies also directly or indirectly contribute positively to this theme. This includes SD14 (Climate Change Mitigation and Adaptation of Historic Buildings), which supports the protection of heritage assets when upgrading the energy performance of these buildings, and SD39 (Agriculture and Forestry), which seeks to protect the heritage value of agricultural buildings during their conversion. Further key policies include policy SD7 (Safeguarding Views), which has a close focus on protecting the '*visual integrity, identity scenic quality*' of National Park and protecting '*specific features relevant to the National Park and its special qualities, such as heritage assets (either in view or the view from)...*', and SD18 (Open Coast), which seeks to conserve and enhance the character of the Heritage Coast and undeveloped coastline. Policy SD20 (Walking, Cycling and Pedestrian Routes) is also relevant as it safeguards disused railway line routes for future use as non-motorised transport corridors, potentially allowing increased access to and enjoyment of such historic assets, and SD19 (Transport and Accessibility) supports development which seeks to initiate measures to '*restrict the impact of heavy goods vehicles and other traffic on historic streets*'.

Table 5.5: Likely significant effects: Cultural Heritage

<i>Likely significant effect</i>	<i>Effect dimensions</i>	<i>Recommendations / mitigation</i>
Protection and enhancement of heritage assets, including repair and reuse where appropriate	Direct, long-term, permanent and positive.	None proposed.
Increased accessibility of heritage assets through safeguarding disused rail lines for future use	Direct, long-term, permanent and positive.	None proposed.

5.3.6 Cultural Activity

Policy SD43 of the Pre-Submission document (New and Existing Community Facilities) sets out a range of provisions for new and/or expanded community facility infrastructure to meet local needs, and also seeks to protect existing community infrastructure. This specifically includes cultural facilities, town and village halls, educational facilities and libraries. This will support the vitality of communities and help ensure that the facilities which support cultural activities are sustained.

The National Park is a major resource for recreation and tourism, which plays a significant role in the local economy. There are number of policies within the Pre-Submission Local Plan which will encourage increased engagement in cultural activity by the community and promote sustainable tourism. For example, protection of landscape character (SD4), the historic environment (SD12-15), biodiversity and geodiversity (policy SD9), views (SD6) and tranquillity (SD7) will conserve and enhance key National Park assets (including special qualities) that draw tourists to the area, while improvements to public transport will indirectly facilitate engagement in cultural activity through increasing accessibility (SD18 and 19).

Other policies seek to provide for the necessary infrastructure to support sustainable tourism as well as discouraging negative impacts such as increased traffic congestion. Policy SD23 (Sustainable Tourism) sets out criteria relating to the development of visitor accommodation and visitor attractions

DRAFT

and policy SD24 (Recreation) does similar for recreation facilities. This will be further supported by the proposals for Shoreham Cement Works, which has a close focus on supporting sustainable tourism / visitor based recreation activities and leisure development directly related to the understanding and enjoyment of the National Park. All three refer to the need to balance development and support for tourism and recreation activities with the need to protect the quiet enjoyment of the National Park and manage wider impacts. There will be a need to carefully manage such impacts, particularly the cumulative impacts of development in tourist 'hot-spots', as well as a need to consider if it is possible to define in advance a 'tipping point' when further tourism development in an area is considered unsustainable.

Policy SD20 (Walking, Cycling and Equestrian Routes) is also relevant as it safeguards disused railway line routes for future use as non-motorised transport corridors, potentially encouraging increased access to and enjoyment of such assets by local people and tourists.

Table 5.6: Likely significant effects: Cultural Activity

<i>Likely significant effect</i>	<i>Effect dimensions</i>	<i>Recommendations / mitigation</i>
Enhancement of landscape character and other key attributes of the National Park will support tourism growth	Indirect, long-term, permanent and positive.	None proposed.
Increase in tourism through a well-planned approach, including provision of supporting infrastructure	Direct, long-term, permanent, positive and negative.	None proposed
Support for cultural activity through protection of existing community facilities and provision of new facilities	Indirect, long-term, permanent, positive .	None proposed
Increased accessibility of heritage assets through safeguarding canals and rail lines	Direct, long-term, permanent and positive.	None proposed.

5.3.7 Health and Wellbeing

The current version of the Local Plan does not seek to facilitate large scale housing and employment growth in the National Park, and does not seek to meet OAN. As such, the Local Plan will facilitate the retention of large areas of undeveloped land within the National Park. This approach will help encourage and promote the use of the National Park as a place for healthy outdoor activity and relaxation and support the various ecosystems services provided by the National Park. Given the benefits provided by the National Park extend to the wider South East of England and beyond, and the role of the National Park as a 'green heart' of the sub-region, the proposed development strategy for the Local Plan will have regional benefits for health and wellbeing.

DRAFT

Similarly, the main impacts of the policies on health and wellbeing will be through protecting and enhancing the National Park's high quality environment. This provides space – including natural green space - for recreation and relaxation, as well as air and water quality benefits. There is now robust evidence that access to nature improves people's health and wellbeing through encouraging healthy outdoor recreation and relaxation. Policy SD4 protects landscape character and policy SD20 supports the development of a network of high quality, multiuser non-motorised routes throughout the National Park. Policy SD46 (Provision and Protection of Open Space, Sport and Recreational Facilities and Burial Grounds/Cemeteries) requires development proposals for new residential development to improve the multi-functional environmental and social benefits and accessibility of existing open spaces to underpin the health, enjoyment and wellbeing of the community.

Policies SD19 (Transport and Accessibility) and SD20 (Walking, Cycling and Equestrian Routes) should indirectly support health and wellbeing improvements by supporting more sustainable modes of transport and thereby enhancing local air quality and encouraging more active travel (though given the dispersed nature of settlement and facilities existing dependence on private cars is likely to remain relatively high).

Policies SD26 (Supply of Homes) and SD28 (Affordable Homes) cover the provision of affordable housing and SD29 (Rural Exception Sites) refers to provision of housing to meet local needs, including relating to the type and tenure of housing, which is also supported by SD27 (Mix of Homes). Access to decent housing is an important wider determinant of health so these policies could indirectly support improved health outcomes and reduced health inequalities.

Policies that address the need to create modern sustainable buildings that achieve high environmental standards and enhance the wellbeing of occupants is dealt with separately under the Climate Change Mitigation section.

The sub-objectives in relation to the Health and Wellbeing sustainability theme include an objective to contribute to a reduction in all aspects of rural crime. Crime and the fear of crime can undermine health and wellbeing by causing stress and anxiety. There are very few explicit references to crime in the Pre-Submission document but there is clear evidence of the ability to 'design out' crime through good design, including in policy SD5 Design which explicitly seeks to ensure that safety and perceptions of safety are integrated within new design.

Provision of health services is covered in the Pre-Submission document, which sets out through policy SD43 (New and Existing Community Facilities) a range of provisions for new and/or expanded community facility infrastructure which meets established local needs, and the protection of existing community infrastructure. This includes healthcare facilities, recreational open space, sports pitches, pavilions, and leisure centres; and town and village halls. In this context the policy recognises the benefits for health and wellbeing of access to wider local services and community facilities. This will be further supported by Policy SD42 (Infrastructure), which will enable the provision of new, improved or supporting infrastructure in the National Park where certain provisions are met.

DRAFT

Table 5.7: Likely significant effects: Heath and Wellbeing

<i>Likely significant effect</i>	<i>Effect dimensions</i>	<i>Recommendations / mitigation</i>
Enhancements to strategic and local green infrastructure networks, helping to alleviate existing deficiencies outside of the National Park.	Indirect, long-term, permanent and positive.	None proposed.

5.3.8 Vitality of Communities

Vital and vibrant communities can be maintained and enhanced through a variety of means, including by supporting town and village centres, ensuring sufficient provision of services and facilities (including schools) and locating housing in the right locations.

Core Policy SD2 (Ecosystems Services), Policy SD25 (Development Strategy) and the housing policies (SD26-29) provide a framework for delivering development across the South Downs National Park; the Pre-Submission Local Plan highlights that this has been informed by a range of factors including the need for development to sustain balanced communities across the whole of the National Park and taking into account the function of, and relationship between, settlements.

The spatial strategy (including policies SD25 Development Strategy and SD26 Supply of Homes), supported by the site allocation policies, will lead to positive impacts on the vitality of communities. This includes and increasing the vitality and viability of town and village centres through facilitating new development in these settlements. This will be further supported by policy SD36 (Town and Village Centres) which establishes criteria for development proposals for town and village centre development. Policy SD43 (New and Existing Community Facilities) will also help to support the vitality of communities by securing the delivery of community infrastructure to meet local needs where has been prior local community engagement and they are accessible and inclusive to the local communities they serve. It also seeks to ensure that development proposals that would result in the loss of, or have an unacceptable adverse impact on, an existing community facility, will not be permitted except in certain circumstances. This will be further supported by Policy SD42 (Infrastructure), which will enable the delivery of new, improved or supporting infrastructure in the National Park where certain provisions are met.

Table 5.8: Likely significant effects: Vitality of Communities

<i>Likely significant effect</i>	<i>Effect dimensions</i>	<i>Recommendations / mitigation</i>
Enhance the vitality of communities by locating housing where it sustains balanced communities.	Direct, long-term, permanent and positive.	None proposed.
Enhance the vitality and vibrancy of town and village centres.	Direct, long-term, permanent and positive.	None proposed.

DRAFT

Enhance the vitality of communities by securing the delivery of community infrastructure.	Direct, long-term, permanent and positive.	None proposed.
---	--	----------------

Enhance the vitality of communities by securing supporting infrastructure as part of new development.	Direct, long-term, permanent and positive.	None proposed.
---	--	----------------

5.3.9 Accessibility

Good accessibility to services and facilities is important to sustaining vital communities (see above) and to health and wellbeing (see section 5.3.7) as well as for reducing air pollution, carbon emissions and traffic congestion related to heavy dependence on car travel. However accessibility to services and facilities is limited in many parts of the National Park due to the dispersed nature of settlements and limited public transport provision.

Policy SD19 (Transport and Accessibility) is anticipated to have a direct positive effect on overall accessibility to services and facilities by ensuring that new development is in locations such as the five main centres where the need to travel, particularly by car, is reduced. It also sets out what improvements to public transport infrastructure will be permitted, and the supporting text highlights that a Transport Assessment, Transport Statement and/or Travel Plan will be required in appropriate cases. Furthermore, the policy seeks to ensure that development will be permitted in town and village centres which appropriately provides for improved footways and cycle routes, cycle parking, and measures to restrict the impact of heavy goods vehicles and other traffic. Protection of and support for improvements to walking and cycling routes through policy SD20 Walking Cycling and Equestrian Routes may also have a positive impact on access to services and facilities over time, assuming that some improvements result in better links between residential area and town centres.

Applying the principle of focusing development within existing settlement boundaries (policy SD25 Development Strategy) should also have some positive effects on accessibility as it will ensure that new development is located close to existing town and village centres where services and facilities are concentrated. Benefits are most likely to take place in the case of the five larger settlements where a broader range of amenities are available. However, additional development may help to support the retention (and in some cases expansion) of existing services and facilities located in smaller settlements by providing a larger consumer base. This will be supported by the site allocation policies, which seek to allocate in settlements and locations with access to some existing services and facilities, and Policy SD42 (Infrastructure) which will enable the provision of new, improved or supporting infrastructure in the National Park where a certain provisions are met.

By clarifying the policy on developing community infrastructure, Policy SD43 (New and Existing Community Facilities) should also have a positive effect on access to public services and facilities used by residents, such as health and wellbeing services, sports and leisure uses, cultural and religious institutions, pubs and local shops, education and youth facilities and open space. This includes through 1) securing the delivery of community infrastructure to meet local needs where has been prior local community engagement and they are accessible and inclusive to the local communities they serve, and 2) through seeking to ensure that development proposals that would result in the loss of, or have an unacceptable adverse impact on, an existing community facility, will not be permitted except in certain circumstances.

Permitting new residential development of 100% affordable housing on rural exception sites outside of settlement boundaries (SD29 Rural Exception) sites could lead to the development of some homes that have poor access to services and facilities and are car dependent. However, Policy SD29 (b) highlights that sites will be selected through a site selection process, which considers the suitability of

DRAFT

the site in terms of 'overall functionality'. As such it is envisaged that this will support accessibility to amenities, provided the site-selection process is undertaken rigorously.

Policies SD45 (Green Infrastructure), SD46 (Provision and Protection of Open Space, Sport and Recreational Facilities and Burial Grounds/Cemeteries) and SD47 (Local Green Spaces) should also improve accessibility to green infrastructure and open spaces and the variety of benefits they can provide by: protecting existing provision; seeking enhancements and improvements to accessibility; and seeking the creation of new open spaces located within or close to housing developments that are safe and accessible for all members of the community.

Table 5.9: Likely significant effects: Accessibility

<i>Likely significant effect</i>	<i>Effect dimensions</i>	<i>Recommendations / mitigation</i>
Support for community facilities through enabling development in more accessible smaller settlements	Direct, long-term, permanent and positive.	None proposed.
Increased provision of community infrastructure.	Direct, long-term, permanent and positive.	None proposed.
Provision of improved accessibility to multi-functional open spaces.	Direct, long-term, permanent and positive.	None proposed.
Improved access to services and facilities including through locating development close to existing centres, better public transport and walking and cycling routes.	Direct, long-term, permanent and positive.	None proposed.

5.3.10 Sustainable Transport

The high dependence on car ownership amongst National Park residents (85% of households owning at least one car) is a reflection both of the affluence of the National Park's population and of poor public transport infrastructure made more pronounced by recent cuts in bus subsidies and services across all four Local Transport Authority areas. Peak capacity on rail commuter routes is also an issue.

The policies relating to sustainable transport aim to address such challenges by enhancing sustainable transport provision where practicable. Applying the principle of focusing development within existing settlement boundaries (policy SD25 Development Strategy) should have a positive effect on accessibility as it will ensure that much of the new development is located close to existing town and village services, albeit the level of services and facilities varies significantly across communities.

DRAFT

Policy SD19 (Transport and Accessibility) is anticipated to have a direct positive impact on the proportion of travel by sustainable modes by ensuring that new development is in locations such as existing centres where the need to travel, particularly by car, is reduced (albeit it should be recognised that many communities contain few services and facilities which may only meet the needs or potential needs of some sections of the community). It also sets out what improvements to public transport infrastructure will be permitted. Protection of and support for improvements to walking and cycling routes (policy SD20 Walking Cycling and Equestrian Routes) may further encourage modal shift to more sustainable transport modes. Policy SD42 (Infrastructure) will also enable the provision of new, improved or supporting infrastructure in the National Park where a range of provisions are met. This is likely to include sustainable transport infrastructure.

Policy S23 Sustainable Tourism and SD46 Provision and Protection of Open Space, Sport and Recreational Facilities and Burial Grounds/Cemeteries will also have a positive impact on sustainable transport by, amongst other things, requiring that countryside based tourism and recreation-related proposals can be satisfactorily accessed by sustainable means, including public transport, walking, cycling or horse riding. Policy SD45 (Green Infrastructure) will also support enhancements to walking and cycling networks in the National Park.

The requirement for proposals for new car parking (Policy SD22 Parking Provision) to demonstrate that *'It is a component of a strategic traffic management scheme which gives precedence to sustainable transport'* is supported as this should help to ensure that car use is not encouraged at the expense of more sustainable modes.

Permitting new residential development of 100% affordable housing on rural exception sites outside of settlement boundaries (SD29 Rural Exception) sites could lead to the development of some homes that are heavily car dependent. However, Policy SD29 (b) highlights that sites will be selected through a site selection process, which considers the suitability of the site in terms of *'overall functionality'*. As such it is envisaged that this will support accessibility to amenities, provided the site-selection process is undertaken rigorously.

Table 5.10: Likely significant effects: Sustainable Transport

<i>Likely significant effect</i>	<i>Effect dimensions</i>	<i>Recommendations / mitigation</i>
Increase use of sustainable transport modes, including public transport and walking and cycling.	Direct, long-term, permanent and positive.	None proposed.

5.3.11 Housing

As set out in policy SD25 (Supply of Homes), the SDNPA will make overall provision for approximately 4,750 net additional homes over a 19 year period between 2014 and 2033. Whilst this is short of objectively assessed need, it is recognised through the NPPF that there is not an expectation that the SDNPA delivers through the Local Plan the full objectively assessed housing need for the area.

Taking this further, Defra's National Parks Vision and Circular 2010 states that National Parks are not suitable locations for unrestricted housing development but that National Park Authorities have an important role to play as planning authorities in the delivery of affordable housing. The expectation is that new housing will be focused on meeting affordable housing requirements and that National Park Authorities should work with local housing authorities and others to ensure that the needs of local communities are met and affordable housing remains so in the longer term.

Key housing challenges in the SDNP include housing affordability and the provision of traveller sites. The distribution of housing across the National Park will need to be in accordance with the

DRAFT

Development Strategy (Strategic Policy SD25). Policy SD26 (Supply of Homes) sets out housing provision figures for housing and overall housing including the expected levels of housing growth by settlement. Policy 27 (Mix of Homes) seeks to 'achieve a *'balanced mix of housing to meet projected future household needs for the local area'*. The policy seeks to achieve this through setting out the proportion of 1, 2, 3, 4 and 4+ bedroom dwellings which should be delivered in i) affordable housing provision and ii) market housing.

Policy SD28 focuses on on-site provision of affordable homes. For sites with the capacity to provide 11 or more homes, a minimum of 50% of new homes created will be provided as affordable homes on-site, of which a minimum 75% will provide a rented affordable tenure. For sites with the capacity to provide between three and ten homes, the policy states that a proportion of affordable homes will be provided in accordance with a sliding scale from one affordable home for developments of 3-4 dwellings to four affordable homes for developments of ten dwellings (at least two of which is a rented affordable tenure). This will help achieve the provision of affordable housing on smaller sites, with the potential to have particular benefits for affordable housing provision in smaller settlements, where suitable sites are almost exclusively of a more limited size. Affordable housing provision will be further supported by policy SD29, which provides for development of 100% affordable housing on rural exception sites. In these respects, these policies therefore extend national affordable housing policy, recognising the key challenge relating to affordable housing provision in the National Park.

Policy SD33 relates to the provision of sites to meet the accommodation needs of Gypsies and Travellers and Travelling Showpeople. It allocates 13 pitches in the part of the National Park located in Brighton & Hove, eight pitches in the part of the National Park located in Lewes District and eleven pitches in the part of the National Park located in East Hampshire and Winchester Districts. The policy also provides protection to existing lawful sites from alternative development and states that development of new permanent or transit accommodation, or temporary stopping places, will be supported where this meets proven need and a series of defined criteria. This is supported by the allocation policies for Gypsies and Travellers and Travelling Showpeople provision, which sets out the locations for additional provision. This policy should have a positive effect in relation to the SA Objective 'To make suitable provision for transit and permanent traveller sites based upon projected need'.

In terms of older people's housing, policy SD26 (Supply of Homes) seeks to provide 'flexible and adaptable accommodation to meet the needs of people who are less mobile, or have adult homecare requirements' and that larger developments may be appropriate for older people's housing. Alongside, policy SD29 (Rural Exception Sites) recognises the role of such sites for the delivery of older people's housing if there is a specific need at the location.

Table 5.11: Likely significant effects: Housing

<i>Likely significant effect</i>	<i>Effect dimensions</i>	<i>Recommendations / mitigation</i>
Increased delivery of affordable housing, including in smaller settlements.	Direct, long-term, permanent and positive.	None proposed.
Provision of housing of a range of types and tenures to meet different needs	Direct, long-term, permanent and positive.	None proposed.
Provide for gypsy and traveller sites to contribute to meeting projected need.	Direct, long-term, permanent and positive.	None proposed.

DRAFT

5.3.12 Climate Change Mitigation

A key SA objective is to address the causes of climate change through reducing emissions of greenhouse gases. The principal policies for achieving this are: policy SD48 (Climate Change and Sustainable Use of Resources) relating to sustainable design and construction of buildings; policies relating to sustainable transport (e.g. policies SD19 and 20) which should help to reduce the growth in emissions relating to car use; and policy SD51 (Renewable Energy). The sustainable transport policies have been considered separately under Sustainable Transport above so this section focuses on policies SD48 and SD51.

Policy SD48 sets clear targets for residential development to achieve a 19% carbon reduction improvement against Part L (2013) and major non-residential development of over 1,000 sq/m or on a site of 0.5ha or more to achieve at least BREEAM 'Very Good' standard. Since reducing energy use and carbon emissions is a key focus of these assessments, this policy will have a strong positive effect on the level of greenhouse gas (GHG) emissions emitted as a result of new development over the lifetime of these developments. Major developments will also be expected to include an energy assessment to demonstrate how carbon dioxide emissions are to be minimised on-site. The policy also states that all *'development proposals, including retrofitting, will be required to demonstrate, proportionately, how the development addresses climate change mitigation and adaptation through the on-site use of zero and/or low carbon technologies, sustainable design and construction, and low carbon materials.'* This sets out a clear steer for energy efficiency, both in terms of new development and retrofitting of existing buildings. The last point is important given that there is significant opportunity to enhance the energy efficiency of existing stock.

With regard to residential developments, the scope to set standards for residential building performance was radically curtailed by the Government's Housing Standards Review. The Ministerial Statement published on 25th March 2015 outlined the Government's new national planning policy on the setting of technical standards for new dwellings and Local Plan making. The Code for Sustainable Homes was formally withdrawn so targets against this should no longer be set in policy, and Local Authorities were no longer able to require higher standards as a planning condition for new approvals. The Deregulation Act also brought in a Clause which amended the Planning and Energy Act 2008 to prevent local authorities from requiring higher levels of energy efficiency than existing Building Regulations.

The implication of this is that whilst SD48 (Climate Change and Sustainable Use of Resources) does not include stretching targets for energy efficiency for residential development, it sits appropriately within the context of national policy.

The Local Plan seeks to encourage the use of electric vehicles. In this context policy SD22 (Parking Provision) aims to ensure that electric vehicle charging points are provided with new parking provision in the National Park where feasible.

Policy SD51 (Renewable Energy) states that renewable energy developments will be permitted subject to complying with a set of defined criteria. This includes relating to the loss of the best and most versatile agricultural land, ensuring public access remains, and that the reinstatement of the site after its use for renewable energy provision is enabled. It also seeks to ensure that the relevant policies of the Local Plan relating to potential impacts on landscape, cultural heritage, wildlife habitats, tranquillity, access and recreation, air and water quality and highways are considered. It also enables the provision of small scale renewable energy provision where they are appropriately screened and sited, are appropriate in scale to the property being served, and there is no unacceptable adverse impact on local amenity or conflict with public safety. This policy gives some clarity to developers about what types of renewable energy development would be permitted, however the policy could be further enhanced by supporting community-led initiatives for renewable and low carbon energy (in accordance with the provisions of NPPF and the UK Government National Park Vision and Circular relating to renewable energy).

DRAFT

The policy also does not refer to the benefits of extending wood planting for carbon storage and woodfuel provision. Given the scope for local sourcing of biomass from local woodland, as well as significant carbon storage, it is recommended that this issue should be given greater policy prominence, perhaps as part of policy SD11 Trees, Woodlands and Hedgerows. This reflects the findings of the South Downs National Park Renewable and Low Carbon Energy Study which highlights that, given the significant biomass resource present locally and the carbon saving potential, there is a need to support the development of the biomass / woodfuel market in the National Park, both from the supply side and the demand side of the market.²⁰

Table 5.12: Likely significant effects: Climate Change Mitigation

<i>Likely significant effect</i>	<i>Effect dimensions</i>	<i>Recommendations / mitigation</i>
Carbon sequestration and provision of woodfuel through extension of wood planting.	Direct, long-term, permanent and positive.	Level of significance uncertain at this stage. Woodland creation and the links to biomass/biofuel use should be given greater policy prominence, perhaps as part of policy SD11, Trees, Woodland and Hedgerows.
Limitation of GHG emissions through reducing need to travel and sustainable transport use.	Direct, long-term, permanent and positive.	None proposed.
Limitation in GHG emissions from development of renewable energy installations.	Direct, long-term, permanent and positive.	Enhance policy SD51 through identifying support for community-led initiatives for renewable and low carbon energy (in accordance with provisions of the UK Government National Park Vision and Circular, and Purposes and Duty of the National Park).

5.3.13 Economy

Policy SD2 (Ecosystem Services) seeks to ensure that activities within the South Downs National Park do not have a significant adverse impact on the natural environment and its ability to contribute goods and services. Ecosystem services such as fertile soils and pollination by insects (e.g. bees) underpin the rural economy. As such, protection of these services from the adverse effects of development will have a positive effect on the rural economy.

Policy SD7 (Relative Tranquillity) aims to preserve tranquillity in the National Park and only allow development proposals which conserve and enhance relative tranquillity. The proposed policy references the South Downs Tranquillity Study and states that development proposals which would have a potential adverse impact on relative tranquillity will be refused.

Whilst the policy would restrict some development in the National Park, it is not viewed that this will have significant adverse effects on the economy. This is due to the potential for new development to enhance tranquillity through improving visual amenity and supporting improvements to the setting and context of the area. This will also directly support a number of key sectors of the National Park's economy, including the visitor and tourism economy. As such a careful and criteria specific approach to tranquillity enhancement will ensure that adverse effects on the rural economy are minimised whilst achieving consistency with overriding national policy for the SDNP.

²⁰ AECOM (May 2013) South Downs National Park Renewable and Low Carbon Energy Study- Main Report

DRAFT

The policy approaches proposed through the Pre-Submission document address transport and accessibility in the SDNP and generally promotes development that reduces the need to travel (section 5.3.10). Given the reliance on private vehicles for transport around much of the National Park, and the lack of public transport services the general intent of the policy has the potential to cause tension. The policy does recognise that larger scale development is more likely to be located close to larger centres. Specific requirements in the form of a design and access statement and/or a transport assessment are required for development outside the main centres of Lewes and Petersfield. While this does impose a further development cost on some rural development, the additional cost is considered negligible and appropriate, given the overall Purposes and Duty of the National Park and the potential for the special qualities to be adversely affected by additional traffic. The policy also promotes the restoration of the former Lewes-Uckfield railway line and the Wey and Arun canal. Restoration of these routes would be expected to make a positive contribution to the values of the South Downs National Park and enhance its role and function as a visitor destination which would be to the benefit of the rural economy in the area. This will be further supported by the proposals for Shoreham Cement Works, which has a close focus on supporting sustainable tourism / visitor based recreation activities and leisure development directly related to the understanding and enjoyment of the National Park. Policy SD23 (Sustainable Tourism) also aims to ensure that the National Park contains appropriate infrastructure to support tourism (while ensuring that supporting infrastructure does not adversely affect the National Park's special qualities). This would be expected to have a positive effect on the economy.

Policies SD25-29 address the provision of affordable housing within the SDNP. This would be expected to have a positive effect on the rural economy in terms of providing accommodation for rural workers and supporting the vitality of rural settlements.

Table 5.13: Likely significant effects: Economy

<i>Likely significant effect</i>	<i>Effect dimensions</i>	<i>Recommendations / mitigation</i>
Promotion of the visitor economy of the National Park	Direct, long-term, permanent and positive.	None proposed.

5.4 Cumulative effects

Cumulative effects occur from the combined impacts of policies and proposals on specific areas or sensitive receptors.

In the context of SA/SEA, cumulative effects can arise as a result of the in-combination and synergistic effects of a plan's policies and proposals. Comprising 'intra-plan' effects, these interactions have been discussed above in Sections 5.3.2 to 5.3.13, which evaluate the in-combination and synergistic²¹ effects of the various policies of the Local Plan.

Cumulative effects can also result from the combined impacts of a plan with impacts of another plan, or the 'inter-plan' effects. These can affect the same receptor, resulting in in-combination or synergistic effects. The South Downs Local Plan therefore has the potential to combine with other planned or on-going activities in the vicinity of the National Park to result in cumulative effects.

Whilst the geographic scope of the SDLP only addresses the area covered by the National Park, the in-combination effects of new development proposed through the adopted or emerging Local Plans for the Local Planning Authorities covering, adjoining or close proximity to the National Park have the potential to lead to cumulative effects. This includes relating to adopted or emerging Local Plan documents for:

²¹ Synergistic effects arise between two or more factors to produce an effect greater than the sum of their individual effects.

DRAFT

- Winchester;
- Eastleigh;
- Fareham;
- Havant;
- Portsmouth;
- East Hampshire;
- Chichester;
- Arun;
- Horsham;
- Worthing/Adur;
- Mid Sussex;
- Brighton and Hove;
- Lewes;
- Wealden;
- Eastbourne; and
- Waverley.

As such, the in-combination effects of housing growth across these Local Planning Authority areas (and further afield) have the potential to lead to cumulative effects.

Furthermore, the combination of Local Plan proposals and other proposals and activities being taken forward in the wider area has the potential to lead to cumulative effects. Examples include:

- Proposed road schemes, such as linked to the long standing aim to enhance the A27 trunk road at various locations along its route.
- Minerals proposals, such as at Ham Farm, Steyning.
- Proposals to increase visitor numbers in the SDNP and areas close to National Park boundaries.
- Proposals associated with the activities of the Partnership for Urban South Hampshire (PUSH), which seek to support the economic growth and vitality of the South Hampshire sub-region.
- Development of Welborne, a new community of c.6000 dwellings to be located north of Fareham.
- Proposals to expand the concept of Nature Improvement Areas, and activities designed to enhance sub-regional green infrastructure networks.

In this context, potential effects (both positive and negative) which may occur as a result of the in-combination effects of the Local Plan and other plans and proposals in the area include the following:

- Increases in traffic flows and congestion from the in-combination effects of development and an increase in visitor numbers, with potential impacts on air and noise quality and landscape character. However the in-combination effects of proposals on enhancing public transport and pedestrian and cycle infrastructure may help limit potential negative effects and secure positive effects in this regard.

DRAFT

- Incremental erosion of the setting of the National Park as a result of the need to deliver objectively assessed need sub-regionally, and associated cumulative impacts on landscape character from new development. This includes views from the National Park. However the Local Plan provides a strong context for protecting and enhancing landscape character of the National Park.
- Cumulative impacts on ecological networks. This is from the in-combination effects of new development and associated infrastructure on habitats and biodiversity corridors. However, enhancements to green infrastructure provision facilitated through Local Plan proposals and other projects in the area have significant potential to support local, sub-regional and regional ecological networks.
- Impacts on regional housing demand from the in-combination effects of the South Downs Local Plan and other Local Plans in the sub-region not meeting local housing need.
- Impacts on flood risk from the in-combination effects of new development, including relating to surface water and fluvial flooding. However, the provisions of the NPPF and measures and policy approaches implemented through the relevant plans and proposals will limit the significance of effects.
- Changes in land uses resulting from the UK leaving the European Union, including associated with the replacement of schemes such the Common Agricultural Policy with new agricultural subsidy regimes.
- Improvements to accessibility resulting from the in-combination effects of enhancements to public transport and walking and cycling networks.

As highlighted above, for many potential cumulative effects, the policy approaches proposed by the current version of the Local Plan will help reduce the significance of these in-combination impacts. However monitoring for the various Local Plans will be a key means of ensuring that unforeseen adverse environmental effects are highlighted, and remedial action can be taken where adverse environmental effects arise, where possible.

Part 3:

What are the next steps?

6. Next Steps

6.1 Next steps for plan making / SA process

This SA Report accompanies the current consultation on the Local Plan (*South Downs Local Plan Pre-Submission*).

Once the period for representations on the *South Downs Local Plan Pre-Submission* document and the SA Report concludes, the main issues raised will be identified and summarised by the South Downs National Park Authority, who will then consider whether, in light of representations received, the plan can still be deemed 'sound'. If this is the case, the Local Plan will be submitted for Examination, alongside a statement setting out the main issues raised during the consultation. The National Park Authority will also submit the SA Report.

At Examination, the Inspector will consider representations (alongside the SA Report) before then either reporting back on the Local Plan's soundness or identifying the need for modifications. If the Inspector identifies the need for modifications to the Plan these will be prepared (and undergo SA where appropriate) and then be subject to consultation (with a possible SA Report Addendum published alongside).

Once found to be 'sound', the Plan will be formally adopted by the South Downs National Park Authority. At the time of Adoption, a SA 'Statement' must be published that sets out (amongst other elements) *'the measures decided concerning monitoring'*.

Appendix A: Regulatory requirements

As discussed in Chapter 1 above, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report; however, interpretation of Schedule 2 is not straightforward. **Table A1** links the structure of this report to an interpretation of Schedule 2 requirements, whilst **Table A2** explains this interpretation.

Table A1: Questions answered by the SA Report, in accordance with an interpretation of regulatory requirements

	Questions answered		As per the regulations...the SA Report must include...
Introduction	What's the plan seeking to achieve?		<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the SA scope?	What's the sustainability 'context'?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What's the sustainability 'baseline'?	<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SA involved up to this point?		<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the Draft Plan
Part 2	What are the SA findings at this current stage?		<ul style="list-style-type: none"> The likely significant effects associated with the Draft Plan The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the Draft Plan
Part 3	What happens next?		<ul style="list-style-type: none"> A description of the monitoring measures envisaged

Schedule 2

Interpretation of Schedule 2

1. an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>	i.e. answer – <i>What's the scope of the SA?</i>
2. the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>	
3. the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level		
4. any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>	
5. the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected		
6. the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues & objectives?</i>	
7. the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal		
8. an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach)	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]	
9. a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.		
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]	
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan		
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]	

Whilst Tables A1 and A2 signpost broadly how/where this report presents the information required of the SA Report by the Regulations, as a supplement it is also helpful to present a discussion of more precisely how/where regulatory requirements are met - see Table A3.

Table A3: 'Checklist' of how (throughout the SA process) and where (within this report) regulatory requirements have been, are and will be met.

Regulatory requirement	Discussion of how requirement is met
Schedule 2 of the regulations lists the information to be provided within the SA Report	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 1 of the SA Report presents this information.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report.
3. The environmental characteristics of areas likely to be significantly affected;	The outcome of scoping was an 'SA framework', and this is presented within section 1.8 in a slightly updated form. The SA objectives were revised in 2015 to take account of updates to the scoping information and key issues presented within the SA Report published alongside the Preferred Options in 2015.
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	More detailed messages from the Scoping Report - i.e. messages established through context and baseline review - are presented within Appendix B .
5. The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	<p>The Scoping Report presents a detailed context review, and explains how key messages from the context review (and baseline review) were then refined in order to establish an 'SA framework'. The context review is provided in Appendix II of this SA Report.</p> <p>The context review informed the development of the SA framework and topics, presented in section 1.8. Taken together, which provide a methodological 'framework' for appraisal.</p> <p>With regards to explaining "<i>how... considerations have been taken into account</i>" -</p> <ul style="list-style-type: none"> • Chapters 3 explains how reasonable alternatives were established in 2014/15 in-light of earlier consultation/SA. • Chapter 3 sets out the summary findings of the appraisal of the reasonable alternatives, with the detailed appraisal provided in Appendix C. • Chapter 3 explains the SDNPA's 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of alternatives appraisal (and other factors). • Chapter 5 sets out the findings of the appraisal of the draft plan.
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water,	<ul style="list-style-type: none"> • Chapter 3 sets out the summary findings of the appraisal of the reasonable alternatives (in relation to the spatial strategy, which is the 'stand-out' plan

Regulatory requirement	Discussion of how requirement is met
<p>air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);</p>	<p>issue and hence that which should be the focus of alternatives appraisal/ consultation), with the detailed appraisal provided in Appendix IV.</p> <ul style="list-style-type: none"> Chapter 5 presents the draft plan appraisal. <p>As explained within the various methodology sections, as part of appraisal work, consideration has been given to the SA scope, and the need to consider the potential for various effect characteristics/dimensions.</p>
<p>7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;</p>	<p>The appraisal of reasonable alternatives presented in Chapter 3 and of the draft plan in Chapter 5 identifies how the plan might potentially 'go further' in certain respects, and makes a number of specific recommendations.</p>
<p>8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;</p>	<p>Chapters 3 deals with 'Reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on particular issues and options.</p> <p>Also, Chapter 3 explains the SDNPA's 'reasons for selecting the preferred option' (in light of alternatives appraisal).</p> <p>Methodology is discussed at various places, ahead of presenting appraisal findings, and limitations/assumptions are also discussed as part of appraisal narratives.</p>
<p>9. A non-technical summary of the information provided under the above headings</p>	<p>The NTS is provided in a separate document.</p>
<p>The SA Report must be published alongside the Draft Plan, in accordance with the following regulations</p>	
<p>authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)</p>	<p>A SA Report was published alongside the Preferred Options for consultation in September 2015. It set out the findings of the SA for the preferred approaches and alternatives at that time.</p> <p>At the current time, this SA Report is published alongside the Pre-Submission consultation Local Plan, under Regulation 19, so that representations might be made ahead of submission.</p>
<p>The SA Report must be taken into account, alongside consultation responses, when finalising the plan.</p>	
<p>The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.</p>	<p>The SDNPA has taken into account the Preferred Options SA Report (September 2015), alongside consultation responses received, when finalising the Submission Local Plan for publication. Appraisal findings presented within this current SA Report will inform a decision on whether or not to submit the plan, and then (on the assumption that the plan is submitted) will be taken into account when finalising the plan at Examination (i.e. taken into account by the Inspector, when considering the plan's soundness, and the need for any modifications).</p>

Appendix B: Summary of context review and baseline data

This appendix presents information which relates to the scope of the SA process. This summarises and updates the information originally included in the SA Scoping Report, which was initially prepared in February 2013, and subsequently updated.

The appendix includes for each theme:

- Context review;
- Baseline data; and
- Key issues for the SA process.

Context Review

Introduction

An important step when seeking to establish the appropriate scope of an SA involves reviewing the key sustainability messages at an international, national and regional level. In this context, there is a need to focus on context messages relating to:

- broad problems / issues; and
- objectives (i.e. 'things that are aimed at or sought').

The context review summarised below has been presented under the topic headings from the SA Scoping Report.

Landscape

The European Landscape Convention requires '*landscape to be integrated into regional and town planning policies and in cultural, environmental, agricultural, social and economic policies, as well as any other policies with possible direct or indirect impacts on landscape*'.

Key messages from the National Planning Policy Framework (NPPF) include:

- Protect and enhance valued landscapes, giving particular weight to those identified as being of national importance.
- Consider the effects of climate change in the long term, including in terms of landscape. Adopt 'proactive strategies' to adaptation and manage risks through adaptation measures including well planned green infrastructure.
- Take account of the different roles and character of different areas, promoting the vitality of main urban areas and recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it.
- Identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value.
- Making a positive contribution to local character and distinctiveness.
- Draw on the contribution made by the historic environment to the character of a place.

At a local level, the context for landscape character is set out in the South Downs Integrated Landscape Character Assessment (2005) updated 2011, the relevant National Character Area descriptions and the Historic Landscape Character Assessment for the National Park.

Biodiversity

At the European level, the EU Biodiversity Strategy¹ was adopted in May 2011 in order to deliver an established new Europe-wide target to 'halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020'.

Key messages from the NPPF include:

- Contribute to the Government's commitment to halt the overall decline in biodiversity by minimising impacts and achieving net gains in biodiversity wherever possible.
- Promote the 'preservation, restoration and recreation of priority habitats, ecological networks' and the 'protection and recovery of priority species'. Plan for biodiversity at a landscape-scale across local authority boundaries.
- Set criteria based policies for the protection of internationally, nationally and locally designated sites, giving weight to their importance not just individually but as a part of a wider ecological network.
- Take account of the effects of climate change in the long term. Adopt proactive strategies to adaptation and manage risks through adaptation measures including green infrastructure (i.e. 'a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities').
- Plan positively planning for 'green infrastructure' as part of planning for 'ecological networks'.
- High quality open spaces should be protected or their loss mitigated, unless a lack of need is established.

The Natural Environment White Paper (NEWP)² sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and personal well-being. Its preparation was, in part, a response to the UK's failure to halt and reverse the decline in biodiversity by 2010 and it signalled a move away from the traditional approach of protecting biodiversity in nature reserves to adopting a landscape scale approach to conservation.

At the local level the Biodiversity Action Plans for Hampshire and Sussex review the status of wildlife in the counties and set out frameworks for action.

Archaeological and cultural heritage

Key messages from the NPPF include:

- Heritage assets should be recognised as an 'irreplaceable resource' that should be conserved in a 'manner appropriate to their significance', taking account of 'the wider social, cultural, economic and environmental benefits' of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.
- Set out a 'positive strategy' for the 'conservation and enjoyment of the historic environment', including those heritage assets that are most at risk.

The Government's Statement on the Historic Environment for England³ sets out its vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life.

¹ European Commission (2011) Our life insurance, our natural capital: an EU biodiversity strategy to 2020 [online] available at: http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/2020/1_EN_ACT_part1_v7%5b1%5d.pdf

² Defra (2012) The Natural Choice: securing the value of nature (Natural Environment White Paper) [online] available at: <http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf>

³ HM Government (2010) The Government's Statement on the Historic Environment for England [online] available at: http://webarchive.nationalarchives.gov.uk/+/http://www.culture.gov.uk/reference_library/publications/6763.aspx

Climate change adaptation

Key messages from the NPPF include:

- Direct development away from areas highest at risk of flooding, with development 'not to be allocated if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding'. Where development is necessary, it should be made safe without increasing levels of flood risk elsewhere.
- Take account of the effects of climate change in the long term, taking into account a range of factors including flooding. Adopt proactive strategies to adaptation and manage risks through adaptation measures including well planned green infrastructure.

The Flood and Water Management Act 2010⁴ highlights that alternatives to traditional engineering approaches to flood risk management include:

- Incorporating greater resilience measures into the design of new buildings, and retro-fitting properties at risk (including historic buildings).
- Utilising the environment in order to reduce flooding, for example through the management of land to reduce runoff and through harnessing the ability of wetlands to store water.
- Identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere.
- Planning to roll back development in coastal areas to avoid damage from flooding or coastal erosion.
- Creating sustainable drainage systems (SuDS).⁵

Further guidance is provided in the document Planning for SuDS.⁶ This report calls for greater recognition of the multiple benefits that water management can present. It suggests that successful SuDS are capable of 'contributing to local quality of life and green infrastructure'.

Climate change mitigation and energy

In its 2007 strategy on climate change, the European Commission assessed the costs and benefits of combating climate change and recommended a package of measures to limit global warming to 2°C.⁷ In relation to energy, the Commission recommended that the EU's energy efficiency improves by 20% and the share of renewable energy grows to 20% by 2020.

Key messages from the NPPF include:

- Support the transition to a low carbon future in a changing climate as a 'core planning principle'.
- There is a key role for planning in securing radical reductions in greenhouse gases (GHG), including in terms of meeting the targets set out in the Climate Change Act 2008⁸. Specifically, planning policy should support the move to a low carbon future through:
 - planning for new development in locations and ways which reduce GHG emissions;
 - actively supporting energy efficiency improvements to existing buildings;
 - setting local requirements for building's sustainability in a way that is consistent with the Government's zero carbon buildings policy;

⁴ Flood and Water Management Act 2010 [online] available at: <http://www.legislation.gov.uk/ukpga/2010/29/contents>

⁵ N.B. The provisions of Schedule 3 to the Flood and Water Management Act 2010 came into force on the 1st of October 2012 and makes it mandatory for any development in England or Wales to incorporate SuDS.

⁶ CIRIA (2010) Planning for SuDS – making it happen [online] available at: <http://www.ciria.org/service/knowledgebase/AM/ContentManagerNet/ContentDisplay.aspx?Section=knowledgebase&NoTemplate=1&ContentID=18465>

⁷ Commission of the European Communities (2007) Limiting Global Climate Change to two degrees Celsius: The way ahead for 2020 and beyond [online] available at: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2007:0002:FIN:EN:PDF>

⁸ The Climate Change Act 2008 sets targets for greenhouse gas (GHG) emission reductions through action in the UK of at least 80% by 2050, and reductions in CO₂ emissions of at least 26% by 2020, against a 1990 baseline.

- o positively promoting renewable energy technologies and considering identifying suitable areas for their construction; and
- o encouraging those transport solutions that support reductions in greenhouse gas emissions and reduce congestion.

Community and well-being (including health)

Key messages from the NPPF include:

- The social role of the planning system involves 'supporting vibrant and healthy communities'.
- A core planning principle is to 'take account of and support local strategies to improve health, social and cultural wellbeing for all'.
- The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities'.
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.
- Set out the strategic policies to deliver the provision of health facilities.
- Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.
- Planning policies should aim to avoid noise from giving rise to significant adverse impacts on health and quality of life.

In relation to other key national messages in relation to health, Fair Society, Healthy Lives⁹ ('The Marmot Review') investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is: *"overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities"*.

The increasing role that local level authorities are expected to play in producing health outcomes is demonstrated by recent Government legislation. The Health and Social Care Act 2012 transfers responsibility for public health from the NHS to local government,¹⁰ giving local authorities a duty to improve the health of the people who live in their areas. This will require a more holistic approach to health across all local government functions.

Economy and employment

Europe 2020 is the EU's growth strategy¹¹. The Europe 2020 strategy seeks to deliver economic growth that is: smart, through more effective investments in education, research and innovation; sustainable, thanks to a decisive move towards a low-carbon economy; and inclusive, with a strong emphasis on job creation and poverty reduction. The strategy is focused on five goals in the areas of employment, innovation, education, poverty reduction and climate / energy.

The EU's Soil Thematic Strategy¹² presents a strategy for protecting soils resources in Europe. The main aim of the strategy is to minimise soil degradation and limit associated detrimental effects linked to water quality and quantity, human health, climate change, biodiversity, and food safety.

Key messages from the NPPF include:

⁹ The Marmot Review (2011) The Marmot Review: Implications for Spatial Planning [online] available at: <http://www.nice.org.uk/nicemedia/live/12111/53895/53895.pdf>

¹⁰ Upper tier and unitary local authorities

¹¹ European Commission (2010) Europe 2020 http://ec.europa.eu/europe2020/europe-2020-in-a-nutshell/priorities/index_en.htm

¹² European Commission (2006) Soil Thematic Policy [online] available at: http://ec.europa.eu/environment/soil/index_en.htm

- Protect and enhance soils. The value of best and most versatile agricultural land should also be taken into account.
- Prevent new or existing development from being 'adversely affected' by the presence of 'unacceptable levels' of soil pollution or land instability and be willing to remediate and mitigate 'despoiled, degraded, derelict, contaminated and unstable land, where appropriate'.
- Encourage the effective use of land 'through the reuse of land which has been previously developed, 'provided that this is not of high environmental value'. Whilst there is no longer a national requirement to build at a minimum density, the NPPF requires local planning authorities to 'set out their own approach to housing density to reflect local circumstances'. This is reflected by latest guidance from DCLG, which highlights that LPAs will play a critical role in bringing forward brownfield land.
- Produce strategic policies to deliver the provision of a variety of infrastructure, including that necessary for water supply.
- The planning system can make a contribution to building a strong, responsive economy by 'ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure'.
- Capitalise on 'inherent strengths', and to meet the 'twin challenges of global competition and of a low carbon future'.
- Support new and emerging business sectors, including positively planning for 'clusters or networks of knowledge driven, creative or high technology industries'.
- Support competitive town centre environments.
- Edge of town developments should only be considered where they have good access. This should be followed with an impact assessment to ensure the town centre remains viable in the long term.
- Enhance and retain markets.
- Support the sustainable growth and expansion of all types of business and enterprise in rural areas and promote the development and diversification of agricultural and other land-based rural businesses.

Other key documents at the national level include Safeguarding our Soils: A strategy for England¹³, which sets out a vision for soil use in England, and the Water White Paper¹⁴, which sets out the Government's vision for a more resilient water sector. It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.

Housing

Key messages from the NPPF include:

- To 'boost significantly the supply of housing', local planning authorities should meet the 'full, objectively assessed need for market and affordable housing' in their area. They should prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period.
- With a view to creating 'sustainable, inclusive and mixed communities' authorities should ensure provision of affordable housing onsite or externally where robustly justified.
- In rural areas, when exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect

¹³ Defra (2009) Safeguarding our Soils: A strategy for England [online] available at:

<http://archive.defra.gov.uk/environment/quality/land/soil/documents/soil-strategy.pdf>

¹⁴ Defra (2011) Water for life (The Water White Paper) [online] available at <http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf>

local needs, particularly for affordable housing, including through rural exception sites where appropriate. Authorities should consider whether allowing some market housing would facilitate the provision of affordable housing to meet local needs.

- The NPPF attaches great importance to the design of the built environment. It explains how good design is a key aspect in sustainable development, and how development should improve the quality of the area over its lifetime, not just in the short term. Good architecture and landscaping are important, with the use of design codes contributing to the delivery of high quality outcomes. Design should reinforce local distinctiveness, raise the standard more generally in the area and address the connections between people and places.

The Government recognises that National Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them (Defra 2010). Consistent with government policy, the expectation is that new housing in the SDNP will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services (Defra 2010). The general exclusion for major development and, in particular major housing development within National Parks is likely to have implications for surrounding authorities for which pressure to provide new housing may be greater, since designation of the SDNP.

Transport

European and UK transport policies and plans place emphasis on the modernisation and sustainability of the transport network. Specific objectives include reducing pollution and road congestion through improvements to public transport, walking and cycling networks and reducing the need to travel. National policy also focuses on the need for the transport network to support sustainable economic growth. The SDNP sits across three counties; Hampshire, West Sussex and East Sussex and Brighton and Hove Unitary Authority. The three county councils and Brighton and Hove have all produced Local Transport Plans¹⁵ for their respective areas which present a long term strategy for the area and an associated implementation plan.

Water

The EU's 'Blueprint to Safeguard Europe's Water Resources' highlights the need for Member States to reduce pressure on water resources, for instance by using green infrastructure such as wetlands, floodplains and buffer strips along water courses. This would also reduce the EU's vulnerability to floods and droughts. It also emphasises the role water efficiency can play in reducing scarcity and water stress.

The NPPF states that local authorities should produce strategic policies to deliver the provision of a variety of infrastructure, including that necessary for water supply and should encourage and incentivise water efficiency measures on the demand side.¹⁶

What is the sustainability baseline?

Introduction

The baseline review tailors and develops the problems/issues identified through the context review so that they are locally specific. A detailed understanding of the baseline can aid the identification and evaluation of 'likely significant effects' associated with the plan / alternatives.

¹⁵ The Hampshire Local Transport Plan 2011-31, the West Sussex Local Transport Plan 2011-2029 and the East Sussex Local Transport Plan 2011-2029.

¹⁶ Defra (2011) Water for life (The Water White Paper) [online] available at: <http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf>

Current baseline

Landscape

The South Downs contains a rich and complex landscape character, with significant local variation and contrast. The South Downs Integrated Landscape Character Assessment, updated in 2011, provides the most current assessment within the SDNP area.

The South Downs has a strong 'island' quality and sense of separateness/difference from the surrounding landscape. However, the South Downs is a relatively narrow protected landscape, and expanding urban areas on the boundaries of the National Park are increasingly eroding its isolated quality.

The South Downs is accessible to a large surrounding population, with 10 million people within an hour's drive. There is consequent demand for infrastructure and facilities, increasing recreational car traffic within the National Park. This results in changes to existing recreation sites, and cumulative effects on the special qualities of remoteness and 'wilderness' that people come to enjoy.

Incremental, small-scale change with gradual erosion of local rural character is a key concern. Conversion of former farm buildings remains an issue, and a recent increase in small holdings and alternative farm enterprises has led to subdivision and clutter. There has also been a notable decrease in grazing, and, in some areas, lack of management and 'set aside' is creating an agricultural landscape that is at odds with the managed character.

The South Downs is still perceived as set apart; an 'island' separate from the rest of the South East. In reality, the rural economy is increasingly connected with adjacent urban areas, and the South Downs is interrelated both physically and perceptually to its surroundings. The large expansion of residential development planned for the South East is likely to result in further changes to the landscape adjoining the South Downs, and climate change has the potential to bring changes to characteristic habitats, land uses, water resources and the coastline. Local, regional, national and wider forces beyond the National Park are driving changes within the South Downs.

Biodiversity

Key wildlife habitats within the SDNP include chalk grassland (4%), lowland heath (1%), woodland (20%, approximately half of which is ancient woodland), farmland habitats (85%), floodplain grazing marsh (1.5%), rivers and streams (321 km of main river), and coastal and marine habitats (including 20 km of coastline). Many of these key habitats have declined significantly in recent decades, both in terms of extent and quality. Human-related pressures such as development, land use change and pollution have resulted in the loss, fragmentation and degradation of many of the priority wildlife habitats within the SDNP (e.g. over 95% of lowland heathlands have been lost globally).

Changing agricultural practice, in combination with other factors, has contributed to a decline in many farmland species. For example, populations of grey partridge and tree sparrow have plummeted by 94% over the past 40 years, and 97% of flower-rich meadows have disappeared since the 1930s. A total of 93,561 ha of land, or 57%, of the SDNP are managed through agri-environment schemes seeking to address declines such as these. There are nine national nature reserves (NNRs) within the SDNP, all of which are also designated as sites of special scientific interest (SSSIs). In total, there are 86 SSSIs in the SDNP covering 6% of the National Park's area. While over half (55%) of the heathland within the SDNP is designated as SSSI, over 80% of these heathland SSSI units are currently in unfavourable condition. Whilst woodland habitats

cover one fifth of the SDNP, a significant proportion of this is under-managed (Natural England and Forestry Commission, 2012).

Archaeological and cultural heritage

The SDNP has a rich cultural heritage and historic environment. In terms of designated sites, this includes 152 Grade I, 221 Grade II* and 4,798 Grade II listed building entries, 616 scheduled monuments, 154 conservation areas, 30 registered parks and gardens, and two registered battlefields.

Historic England undertakes an annual audit of the historic environment and produces a 'Heritage at Risk' Register. In 2011, this identified 50 (8% total) scheduled monuments, nine Grade I and II* listed buildings, two parks and gardens and nine conservation areas within the SDNP that were "at risk" as a result of neglect, decay or inappropriate development (English Heritage, 2011)¹⁷.

The register does not currently extend to Grade II listed buildings and a survey to rectify this is in progress. There is also limited knowledge of buildings and archaeological sites which are important locally but not protected under the national system (e.g. the challenge of providing reliable information on the stock of historic farm buildings cannot be underestimated) (University of Sheffield et al. 2009)¹⁸. These buildings and their use of local materials make an important contribution to local distinctiveness. There is information on farmsteads in the Hampshire and SE England Farmstead Character Study. The Historic Landscape Characterisations of Hampshire and Sussex provide evidence of the historic dimension of the South Downs landscapes.

In the Hampshire part of the SDNP, of 62 non-scheduled round barrows visited in 2002, 53% had either been ploughed and would disappear if damage continued or had been destroyed or irreparably degraded. A survey of the Sussex Archaeological Field Unit in 1975 identified that, of the known sites surveyed, 60% of the Bronze Age settlements, 64% of Iron Age settlements and 94% of Neolithic open settlements had been damaged. Over 60% of major field systems, Roman sites and villas and Saxon settlements had also been damaged. The South East has suffered the greatest loss of parkland of any English region since 1919 (South Downs Joint Committee, 2007)¹⁹.

Climate change poses a threat to the historic environment in two ways. The first is the impact of changes in temperature and rainfall on decay processes in both buildings and sub-surface archaeology (English Heritage, 2008)²⁰. The second arises from a poor understanding of the morphology and performance of traditional solid-wall construction. In the absence of that understanding there is a threat to the historic environment from the well-intentioned but ultimately destructive application of modern technologies designed to enhance thermal and energy performance. Energy efficiency assessment of the existing building stock is complicated by the fact that standard calculating methods underestimate the thermal performance of traditionally built buildings (Rye, C., 2011)²¹.

Climatic factors

UK air temperatures continue to rise having increased by 2°C over the past 350 years with 10 of the hottest years over this period recorded since 1999. The strongest average monthly temperature increases have been in the South East along with the Midlands and East Anglia.

¹⁷ National Heritage Protection Plan (English Heritage 2011-2015).

¹⁸ University of Sheffield, English Heritage & The Countryside Agency, 2009. Historic farm buildings: Extending the evidence base.

¹⁹ South Downs Joint Committee, 2007. The South Downs Management Plan.

²⁰ English Heritage, 2008. Climate Change and the Historic Environment.

²¹ Rye, C., 2011. The SPAB U-value Report – Revised October, 2011.

Table B1 shows projected winter and summer temperature and precipitation changes based upon UK Climate Projections for a medium emissions scenario. This suggests that the South East will experience hotter, drier summers and warmer wetter winters with more extreme weather events.

Sea level rise predictions for the south east had previously been estimated at 4.0 mm per year through to 2025 and thereafter 8.5 mm per year through to 2055. Actual sea level rise as a result of thermal expansion is slightly less than forecast to isostatic readjustment.²² However, with very high levels of ice sheet melt the sea level could rise by up to 1.9 m by 2095 (EA 2010)²³.

Climate change will result in a range of direct and indirect effects on both the natural and human environment including flooding, increased soil erosion related to both sea level rise and current and projected wetter winters. This may impact on soil condition with increased erosion and nutrient loss. Drier summers will exacerbate the predicted supply/demand deficit for water supply.

Table B1 UK Climate Change Projections for the South East 2009

<i>Key potential changes</i>	<i>Amount of change from 1962-1990²⁴</i>	
	<i>In the 2020s</i>	<i>In the 2050s</i>
Hotter summers	+1.6°C (0.6 to 2.8) °C	+2.3°C (1.3 to 4.7) °C
Drier summers	-8% (-28% to +15%) change in rainfall	-20% (-42% to +7%) change in rainfall
Warmer winters	+1.4°C (0.6 to 2.2) °C	+2.2°C (1.2 to 3.5) °C
Wetter winters	+7% (-5% to +21%) change in rainfall	+18% (+2% to +39%) change in rainfall
Overall change in rainfall	+1% (-6% to +5%) change in rainfall	-2% (-8% to +4%) change in rainfall

Climate change mitigation and energy

Generation of electricity from renewable sources is increasing in the South East. In 2013, the region generated 5,550 GWh of electricity from renewable sources; equivalent to 14.3% of total energy consumption in the region, and the second highest of any region in England. Of this, 3,336 GWh were from wind, 965 GWh were from landfill gas, and 814 GWh were from other sources of bioenergy. The proposed Rampion Offshore Wind Farm Project will have an installed generating capacity of 665 MW and will make a further significant contribution towards renewable electricity generation in the South East.

Evidence collation for energy consumption has been identified as a current weakness in the State of the Park Report and a study was commissioned during 2012²⁵ in order to better understand existing and projected energy supply and consumption patterns, the opportunities for energy efficiencies and the scope for optimising low carbon energy generation within the constraints of the SDNP purposes. Key findings from the study were as follows:

- Annual energy demand within buildings in the National Park is around 2,287,271MWh. Given the current mix of fuel sources used, this contributes around 675,438 tCO₂/yr.

²² The post-glacial rising of the landmass in the northern UK, causing a sinking in the south-east of the island.

²³ Environment Agency (2010) Climate change impacts on Southern Region

²⁴ These are the central estimates for the medium emissions scenarios for the South East River Basin District with the 10% and 90% probability values in brackets. Source: Environment Agency, 2010 after UK Climate Impact Programme (2010).

²⁵ AECOM (2013) South Downs National Park Renewable and Low Carbon Energy Study

- Energy use is generally higher per residential dwelling than it is in other parts of the country, reflecting the largely detached and semi-detached nature of the housing stock. The majority of this demand comes from residential energy use.
- Taking into account savings already made nationally, to achieve an 80% reduction in CO₂ emissions based on 1990 levels by, the SDNP would need to reduce building related emissions to 164,751 tCO₂/yr.
- Wind resources could theoretically deliver 4,351,092MWh of electricity (twice the total electricity demand in the South Downs) and biomass could theoretically deliver 210,087MWh of heating. However this potential is limited by the environmental constraints within which the National Park sits.

The SDNPA is the custodian of land rich in woodlands and there is significant potential for additional carbon sequestration through additional woodland planting in the National Park. A case in point is the 75ha woodland that the National Trust are planting on the Slindon Estate.

Community and well-being

The population of the South Downs is predominantly rural with an average population density of 70 persons per km² compared to a South East average of 440 persons per km². However, population density in Petersfield, Midhurst and Lewes is as high as 5,000 persons per km² in places. The dispersed nature of settlement and facilities coupled with limited public transport infrastructure results in a high dependence on private car use. An estimated 85% of residents own at least one car and an estimated 63% of the working population travel to work by car.

Elderly persons within the population (i.e. those aged 65 and over) account for around 22% of the SDNP's population, compared to 17% in the wider South East. The population is also ageing faster with the largest increase between 2001 and 2009 being recorded for those aged 60-64 (26%), with increases also recorded in the over 85 age group (17%) and those aged 80-85 years (11%). The largest decreases were recorded in those aged 30-34 years (-39%) and 35-39 years (-19%).

Mapping the indices of multiple deprivation (IMD) for health indicates that there are pockets of health deprivation in urban areas adjacent to the SDNP, including parts of the Brighton and Hove and Worthing local authority areas, and some areas around Winchester. In terms of general deprivation, overall, this is low across the SDNP, but there are areas of higher deprivation around Brighton and Hove and Worthing, as well as pockets at Petworth and, notably, a large rural area of Lewes District.

Inequalities exist in both physical and educational access to the countryside and cultural facilities between different social groups. A recent study commissioned by Natural England on behalf of the SDNPA, examined the existing access network using the Accessible Natural Greenspace standards (ANGst) as a guide. There are some locations, particularly in urban areas, where the population has limited access to natural greenspace. This data, when overlaid with information on the density of the public rights of way network highlights areas immediately adjacent to the SDNP where communities lack access to both rights of way and Accessible Natural Greenspace (South Downs National Park Authority Access Network and Accessible Natural Greenspace Study, 2014).

Nationally, approximately 10% of the population is from a black minority or ethnic (BME) background but only 1% of visits to National Park are from a BME community (Campaign for National Parks, 2012). In 2009, Natural England, Defra and the Forestry Commission commissioned a new survey called Monitor of Engagement with the Natural Environment (MENE) to provide baseline and trend data on how people use the natural environment in England. The SDNPA has commissioned bespoke analysis of this survey data for the SDNP which will facilitate a better understanding of how people engage with the natural environment in the South Downs. This will support their work to remove barriers and open up opportunities for all sectors of society to understand and enjoy the South Downs.

A pan-Sussex Review of Environmental Centres by the Sussex Wildlife Trust identified five key areas of weakness in physical and educational access, as shown Table B2.²⁶

Table B2 Weaknesses in physical and educational access / facilities at environmental centres

<i>Weakness in environmental education provision</i>	<i>Percentage of centres reporting weakness</i>
Insufficient funding for educational facilities	34%
Lack of funding, particularly for education staff	31%
Centres grounds or interpretation not ideal for disabled access	24%
Transport to site difficult or costly	21%
No or limited accommodation	21%

A household is considered to be 'fuel poor' if it needs to spend more than 10% of household income on fuel to maintain a satisfactory level of heating (21°C for the main living area and 18°C for other occupied rooms. The percentage of homes in fuel poverty is higher in the South Downs National Park (14.5% compared with 12.5% in the South East). One contributory factor is the number of households that fall outside the gas grid in the rural areas of the National Park.

Economy and employment

The GVA per capita across the National Park is £19,450, broadly similar to the South East and well above many parts of the UK. The unemployment rate recorded at the 2011 Census was 2.6%, below the national average of 4.4% and the South East average of 3.4%. It is likely that this reflects the relatively high house prices within the National Park. The average rural house price is £400,300, whilst in the towns it stands at £265,400. There are also high levels of both in and out commuting for work.

Businesses tend to be concentrated in industries such as agriculture, forestry and fishing and professional, scientific and technical services. Retail, health sector and construction are slightly less represented in the SDNP compared to the surrounding area. Evidence seems to suggest that many businesses are small or micro businesses (0-9 employees) and that many of these will be home-based. Many areas of the SDNP suffer from poor broadband access and this is a constraint to competitiveness in the online marketplace and a key issue to be addressed.

There are a few areas in or around the main market towns with lower incomes and greater unemployment (Hampshire County Council, 2011)²⁷. Housing is unaffordable for many people in rural West Sussex.²⁸

Housing

In 2011 there were 50,049 dwellings in the SDNP. The SDNP has a high proportion of detached homes (40% of all homes) with semi-detached homes accounting for a further 27% of homes. Given the high proportion of larger houses and the associated high prices of housing in the National Park, access to affordable housing is a key issue facing many local communities within the National Park.

The affordability ratio indicates how many multiples of the average annual salary are needed to purchase an average priced house in a given area. In 2013 the average national ratio was 6.7, whilst the South East ratio

²⁶ Source: Review of Environment Centres in the Pan-Sussex Area, WWT Consulting, June 2007

²⁷ Hampshire County Council, 2011. South Downs National Park Local Economy: Current economic indicators for the local economy of the South Downs National Park, September 2011.

²⁸ West Sussex County Council, 2012. Supporting Economic Growth in West Sussex An Economic Strategy for West Sussex | 2012-2020

was 7.3. Eastbourne (ratio of 7.0) is the only area in the SDNP where houses are more affordable, compared to the regional average. The other 11 districts have a much lower housing affordability with an average resident of East Hampshire spending 11.3 times their annual salary in order to purchase an average priced house. In Chichester it is 10.6, and in Winchester 10.5²⁹.

There were approximately 3,043 households on housing waiting lists in the SDNP in 2014 which represents 6.4% of the 47,273 households in the SDNP recorded in the 2011 Census.³⁰ This represents an increase of 20% on the number of households on local authority housing waiting lists in 2008 (DTZ, 2011)³¹.

The government recognises that National Parks are not suitable locations for unrestricted housing (Defra 2010)³². Consistent with government policy, the expectation is that new housing in the SDNP will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services (Defra 2010). The general exclusion for major development and, in particular, major housing development, within National Parks is likely to have implications for surrounding authorities for which pressure to provide new housing may be somewhat greater since designation of the SDNP although the vast majority of land comprising the SDNP (~90%) was designated as an Area of Outstanding Natural Beauty that enjoys equivalent protection in terms of landscape character.

Transport

It is helpful to differentiate between the transport considerations for business and residential communities as being distinct from visitors to the SDNP that will be likely to show greater seasonality.

The high dependence on car use by residents of the SDNP has already been highlighted. The increasing dependence upon car travel is in part a reflection of poor public transport infrastructure made worse by recent cuts in bus subsidies across all four local transport authority areas that have resulted in reduced services in some areas and a complete cessation of bus services in others.

Car ownership levels are high with 85% of residents owning at least one car and an estimated 63% of the working population travelling to work by car representing 7.76 million two way journeys annually. Based on 2012, data there were an estimated 46 million visitor days spent in the South Downs. High visitor dependence upon cars means car parking is an issue particularly for popular destinations and also for mass participation events such as long distance runs / cycle rides.

Approximately 22,500 residents commute out to other destinations in the South East, including London. Peak capacity on rail commuter routes between London and south coast termini railway stations such as Brighton, Portsmouth and Southampton is an acknowledged problem (e.g. by 2020 the Brighton Main Line service to London will be operating at 100% capacity notwithstanding current planned measures to provide additional capacity (Network Rail, 2010)³³). Similar capacity issues are affecting coastal services primarily driven by housing development and associated population increases. While few stations are location in the National Park itself, many stations are within easy reach of the boundary and better links between settlements and rail stations could contribute to a change in levels of car use and commuting patterns.

The SDNP is crossed by a number of strategic highway routes including the M3, A3, A24, A23 and A26 with north-south routes concentrated within the principal chalk valleys. The A272 is a significant east-west route through the SDNP, and parts of the A27 runs along the southern boundary. Pressures for road

²⁹ Winchester District Local Plan Part 1 – Joint Core Strategy Submission June 2012 Background Paper – 2 Affordable Housing Policies.

³⁰ This data is not available at National Park level. This has been calculated by aggregating local authority data for the twelve districts within the SDNP.

³¹ DTZ, 2011. South Downs National Park Housing Requirements Study: Final Report.

³² Defra, 2010. English National Parks and the Broads UK Government Vision and Circular 2010.

³³ Network Rail 2010. Sussex Route Utilisation Strategy.

improvements, often with major cuttings and/or tunnels in the Downs, have been an issue in the eastern Downs. This has led to reduced perceptions of tranquillity in open downland landscapes, especially adjacent to settlements. Furthermore, strategic highways can act as a barrier to people accessing the National Park by sustainable modes – e.g. the barrier of the A27, combined with poor bus connectivity leads to the car being the preferred travel choice for visitors from just outside the National Park.

Water

Both the chalk of the South Downs and the Lower Greensand represent significant aquifers. These groundwater aquifers supply the large majority of the people living within and around the South Downs with their drinking water, constituting approximately 75% of supply. The chalk aquifer also feeds water into chalk springs, and provides the source for the important chalk rivers of the Meon and on the western edge of the SDNP, the Itchen.

Pressure from new development and rising household demand is increasing the need for water across the South East. This is having an impact on the water resources from the SDNP. Not all areas are affected; the Water Resource Management Plan (WRMP) for Portsmouth Water's supply zone over the next 25 years forecasts a surplus in the supply / demand balance. The level of abstraction, from both the Chalk and Lower Greensand aquifers across the SDNP, already exceed the available natural resource (Environment Agency, 2012)³⁴. This also has an effect on river flows and their ecological condition.

Water companies produce WRMPs every five years which set out how they will manage such increasing demands and maintain supplies over a 25 year horizon. However, with regards to Purpose 1 of National Parks, resource development options (e.g. new reservoirs, groundwater sources) have to be environmentally sustainable and not lead to the further deterioration of river flows and aquifer storage. The SDNPA has a role to play in influencing environmentally sustainable options, working with the Environment Agency in the review of water resource management plans.

An additional issue in water resource planning exists in the South East due to the number of water companies operating in the region. With each company looking to meet future demands with additional headroom factored in (i.e. added security to meet extra demand), over-capacity can result. To address this issue, the 'Water Resources in the South East Group' (WRSE) was set up which comprises all the water companies and the Environment Agency, to determine the most sustainable solution to addressing supply-demand imbalances and the risk of 'over capacity'. The WRSE has been effective in influencing the 2009 and 2014 Price Review/associated plans.

In 2008/09, the average actual per capita water consumption in the SDNP was 170 litres per person per day. This needs to reduce to 135 litres per day by 2016 to meet the government's aspiration of 130 litres per person per day by 2030 or 120 litres per person, per day with technological development (Environment Agency, 2009)³⁵. Increasingly, water metering is being introduced by water companies as part of a package of demand management measures. Each water company associated with the SDNP is forecasting reductions in per capita consumption in their latest WRMPs.

Future baseline and key sustainability issues

As noted, the SEA Regulations require that consideration be given to the likely evolution of the baseline environment without implementation of the plan. This is known as the 'future baseline'.

³⁴ Environment Agency, 2012. South East Environmental Data Report for the South Downs National Park Region

³⁵ Environment Agency, 2009. Water Resources Strategy – Regional Action Plan for Southern Region

Table B3 sets out the key sustainability issues and the likely evolution of the baseline without the implementation of the plan.

Table B3 Likely future baseline conditions and key sustainability issues without implementation of the SDLP.

<i>Key sustainability issues</i>	<i>Evidence and trends</i>	<i>Consequences for future baseline if no action taken</i>
<i>Landscape</i>		
Degradation of landscape character.	<p>The SDNP's landscape character is under pressure from a range of aspects including increasing specialisation of agriculture, changing lifestyles and changing forms of land ownership, road improvement schemes and telecommunications infrastructure (masts etc.). To date, most of the key aspects of the landscape have been well maintained.</p> <p>Baseline and future changes are provided in South Downs National Park Integrated Landscape Character Assessment. Typical frequency for updates to Landscape Assessments is ten years.</p>	<p>Changes in landscape character across the National Park. Cumulative, synergistic and indirect effects on character.</p> <p>Increasing pressure on the existing landscape character, most likely to be incremental and cumulative change over time from small individual changes in the landscape. Pressure for landscape change is likely to be most acute around existing settlements.</p>
Increased urbanisation and loss of local distinctiveness, character and integrity of the historic built environment and its setting.	<p>Local distinctiveness being eroded by incremental change, small-scale developments, extensions and conversions unsympathetic to settlement form and local vernacular styles. Baseline provided in South Downs National Park Integrated Landscape Character Assessment.</p> <p>SDNPA commissioned a Buildings at Risk Survey in 2012/13. This found that levels of risk and vulnerability within the National Park are extremely low.</p>	<p>Pressures for provision of housing within the SDNP have the potential to adversely affect the landscape character and the overspill of existing villages and market towns into surrounding rural areas. Further unsympathetic developments will lead to the greater erosion or loss of the character and local distinctiveness of the SDNP settlements and landscape.</p> <p>Pressure from increased development with the potential to lead to loss of local character is mostly likely to be experienced around existing settlements.</p>

<i>Key sustainability issues</i>	<i>Evidence and trends</i>	<i>Consequences for future baseline if no action taken</i>
Noise and light pollution.	<p>As highlighted by Dark Night Skies Mapping (ongoing), EcoServe GIS models (Climate Regulation and Carbon Sequestration), effects on tranquillity are taking place, including through poorly sited noisy developments, excessive and poorly designed lighting, and air pollution from vehicles. The lowest tranquillity scores are associated with the areas that are close to the conurbations of Brighton, Hove and Worthing both inside and outside the National Park. SDNPA has no control on the impact from development outside the SDNP although it can seek to influence this through the Duty to Co-operate.</p> <p>The SDNPA is actively campaigning to create an International Dark Skies Reserve registered with the International Dark Skies Association. This initiative is being actively pursued through the Duty to Co-operate.</p>	<p>Further development may lead to continued loss of tranquillity and dark night skies in the SDNP. Remaining areas of tranquillity are under threat, particularly where the conurbations of the south coast impact upon the adjacent downland.</p>
Landscapes lack sufficient permeability for species to be able to move or respond to climate change (national trend).	<p>Some habitats and species are more sensitive to climate change than others. Species composition can change, for example favouring grasses and more drought tolerant species. Sites under five hectares are more vulnerable as they have less resilience. Small isolated fragments of habitat are more likely to be lost.³⁶</p>	<p>Increased habitat fragmentation will mean that landscapes will lack the adaptive capacity to deal with major threats, such as a shift in climatic conditions.</p>
<i>Biodiversity</i>		

³⁶ Habitat Connectivity Mapping (Thompson Ecology, 2015), Climate Change Vulnerability Mapping (Natural England, 2014)

<i>Key sustainability issues</i>	<i>Evidence and trends</i>	<i>Consequences for future baseline if no action taken</i>
Many wildlife habitats are small and fragmented. Lack of long-term, sustainable land management for biodiversity, ecosystem services.	Over 95 per cent of lowland heathlands have been lost globally. While over half (55 per cent) of the heathland within the National Park is designated as SSSI, over 80 per cent of these heathland SSSI units are currently in unfavourable condition Chalk grassland has suffered badly from loss and fragmentation within the SDNP. A number of ancient woodlands are deemed to be 'under threat': Woodland habitats of particular value for biodiversity within the SDNP include 'hanger' woodlands (which cling to steep greensand and chalk slopes); yew forests (e.g. Kingley Vale); ancient wood pasture (e.g. Ebernoe Common near Petworth); wooded heaths (for example, Blackdown near Haslemere); 'rews and shaws' (linear strips of ancient woodland along field edges and streams); and 'veteran' trees. While habitat loss / fragmentation is recognised as an issue, the situation has been improving under strategic work undertaken by the SDNPA and partners, such as the Nature Improvement Area (NIA) project South Downs Way Ahead that has reduced habitat fragmentation of calcareous grassland. Similarly efforts are to be targeted at heathland habitat through the Heathlands Reunited project.	The failure to address habitat fragmentation and management issues will result in further deterioration in site conditions and loss of biodiversity through insufficient capacity to support vulnerable species.
Potential conflicts between differing priorities e.g. access and biodiversity.	In recent years targeted conservation efforts, sensitive land management and landscape-scale coordination have led to the recovery of some of the special wildlife and habitats of the South Downs. However, nationally, changes in the economy, agricultural policy and the application of new technologies resulted in more intensive agriculture in recent decades which has had a devastating impact on many farmland species. Nationally, over the past decade or so, agri-environment schemes have helped to address declines in some farmland species. Increased uptake of agri-environmental schemes should help to continue this trend.	Pressures for increased provision of access and recreational opportunities and increased development within the SDNP (albeit on a small scale) has the potential to adversely affect the richness and diversity of the National Park's wildlife and habitats.

<i>Key sustainability issues</i>	<i>Evidence and trends</i>	<i>Consequences for future baseline if no action taken</i>
Climate change impacts on biodiversity within the National Park.	A 2013 assessment ³⁷ highlighted that habitats in the South Downs National Park are likely to be vulnerable to climate change, for example changes in habitat extents and species composition.	<p>Woodland is likely to experience changes in species, possible increased pests and disease and will be vulnerable to drought. Beech trees and woodlands on well-drained, south facing slopes are likely to be most affected.</p> <p>Lowland heath is particularly vulnerable to drought and increased summer temperatures, which may lead to changes in the composition of plant communities. Drier summers will also increase the risk of fires. These impacts are particularly relevant to the heaths of the Wealden greensand in West Sussex and extending in to Hampshire.</p> <p>Wetlands such as floodplain grazing marsh are vulnerable to cycles of drought and flood leading to waterlogging and increased siltation, but also drying out, causing loss of habitat for wetland birds and soil erosion. Increased demand for water and changes in management, such as grazing practices, will exacerbate the vulnerability of this habitat. These impacts are particularly relevant to the Arun Valley SPA and associated SSSIs and Local Wildlife Sites.</p>
<i>Archaeological and cultural heritage</i>		

³⁷ TALOR, S., MATTHEWS, R., MACGREGOR, N., VAN DIJK, N., DARCH, G. & NEALE, A. 2013. Assessing the potential consequences of climate change for England's landscapes: the South Downs National Park. Natural England Research Reports, Number 051.

<i>Key sustainability issues</i>	<i>Evidence and trends</i>	<i>Consequences for future baseline if no action taken</i>
Ongoing damage to archaeological sites and historic features and historic landscapes and designed parkland.	In the Hampshire part of the SDNP, of 62 non-scheduled round barrows visited in 2002, 53% had either been ploughed and would disappear if damage continued or had been destroyed or irreparably degraded. A survey of the Sussex Archaeological Field Unit in 1975 identified that, of the known sites surveyed, 60% of the Bronze Age settlements, 64% of Iron Age Settlements and 94% of Neolithic Open settlements had been damaged. Over 60% of major field systems, Roman sites and villas and Saxon settlements had also been damaged. SDNPA is seeking to record and interpret subterranean archaeology using LIDAR ³⁸ in the Secrets of the High Woods Project. The South East has suffered the greatest net loss of parkland of any English region since 1919.	Lack of detailed knowledge and management may lead to further degradation and loss of archaeological features and other heritage assets.
"Heritage at risk" – Conservation Areas, listed buildings, scheduled monuments in particular.	SDNPA commissioned a Buildings at Risk Survey in 2012/13. This found that levels of risk and vulnerability within the National Park are extremely low. 8% scheduled monuments in the National Park are deemed by Historic England to be 'at risk'. Whilst the full extent of heritage at risk has not been collated in the National Park, significant progress is being made in determining which sites and areas are at risk, including through Conservation Area Appraisal and Management Plan updates.	Ineffective management of heritage at risk could result in neglect, decay or inappropriate development in relation to both designated and non-designated sites.
	The National Park has 165 conservation areas of which 20 are identified by Historic England as being at risk although a review is in progress to establish the full extent of conservation areas at risk.	The absence of up to date conservation area appraisals and active management plans threatens to result in incremental change that will undermine the historic identity and features for which the area was designated.

³⁸ LIDAR is a remote sensing technology that measures distance by illuminating a target with a laser and analyzing the reflected light. Using LIDAR, man-made features are highlighted in the return signal and can be mapped to reveal hitherto undetected landscape features.

<i>Key sustainability issues</i>	<i>Evidence and trends</i>	<i>Consequences for future baseline if no action taken</i>
Effects on the historic environment from climate change.	Energy efficiency assessment of the existing building stock is complicated by the fact that standard calculating methods underestimate the thermal performance of traditionally built buildings (Rye, C., 2011).	Effective assessment and targeting of energy efficiency programmes will potentially result in inappropriate measures if the most recent scientific data regarding thermal performance of building materials are not applied.
<i>Climatic factors</i>		
Flood risk, increased soil erosion and adaptation related to both sea level rise and current and projected wetter winters. Increased cycles of drought and flooding are projected.	Sea level rise is currently of the order of 4 mm p.a. Predicted overall increase in rainfall for the south east is +18% (+2% to +39%). Coastal habitats such as inter-tidal chalk and maritime cliff and slope are potentially vulnerable to erosion, rubble landslides and permanent inundation from sea level rise. This is particularly relevant to the Seaford to Beachy Head SSSI.	Increased incidence of fluvial, coastal, groundwater and surface water flooding. Increased incidence of drought. Increased incidence of soil erosion. Chalk Rivers and streams will be vulnerable to drought leading to drying out of stream heads and changes in flow. This can lead to destabilisation of banks, an increase in sedimentation, concentration of pollution, reductions in habitat area, and a reduction in the effectiveness of flood storage services.
Maintenance of clean water supply in face of increasing demand for water (given drier summers).	National data predicts and 8% reduction in rainfall (-28% to +15%) in the 2020s from rainfall data over the period 1962-1990).	Any effects should be largely offset by water companies that are required to maintain their 'level of service' through their WRMPs and drought plans. Each WRMP should be future-proofed against climate change impacts as they are subject to a climate change impact assessment. However, there could be an increased incidence in 'other drought mitigation measures' through the EA drought plans – e.g. spray irrigation bans relating to abstraction other than for public water supply that may result in the future as a consequence of failing to implement the Local Plan.

<i>Key sustainability issues</i>	<i>Evidence and trends</i>	<i>Consequences for future baseline if no action taken</i>
Increased impact on soil condition resulting from erosion and nutrient loss.	The cost of soil degradation in England is currently estimated at between £250 and £350 million per annum. Increased cycles of drought and flooding are projected. Locally, soil erosion is an acknowledged issue in the Rother Valley catchment. This is the focus of the Sediment Pressures and Mitigation options for the River Rother (SMART). The South Downs National Park Authority is pursuing the project in partnership with the University of Northampton, the Environment Agency (EA) and the Arun and Rother Rivers Trust (ARRT) as part of a long term objective to restore the River Rother into ecologically favourable condition.	This may impact on soil condition with increased erosion and nutrient loss/run-off on some steeper slopes. Higher rainfall is likely to result in increased soil erosion. Key access and recreation assets such as footpaths may be vulnerable to erosion due to drought in summer, flooding in winter and increased visitor use. Country Parks and other sites will be vulnerable to both drought and flooding, which could damage sites, alter the landscape, and potentially reduce access
Increase in extreme rainfall events and flooding.	The cost of damage to UK properties through flooding has reached around £1.3 billion per annum. This does not include the cost of damage to agricultural land or of crop loss (which are not insurable). More extreme rainfall events, such as in 2007, 2009 and 2012 have caused significant disruption and damage. The overall cost of flooding in the SDNP is not known. However, examples of flooding include: <ul style="list-style-type: none"> Lewes experienced severe flooding in 2000 (prior to the establishment of the National Park) when 613 residential and 207 business properties were flooded, along with 16 public buildings. 1000 people were displaced. 503 vehicles were damaged or destroyed and the total cost of the flooding was given as £88M³⁹. Hambledon flooded during winter 2014 for a prolonged period owing to ground water saturation. The cost to the community according to the Chair of the Flood Action Group was estimated to be £5M⁴⁰. 	If this trend continues, increased risk of flooding of properties and agricultural land. Wetter winters will increase frequency of both fluvial and groundwater flooding at high risk sites and increase the number/distribution of sites at risk.

³⁹ Note published by Lewes Flood Recovery Coordinating Group to document lessons identified.

⁴⁰ Statement by Tony Higham, chairman of Hambledon Flood Action Group in Portsmouth News article 5 Feb 14.

<i>Key sustainability issues</i>	<i>Evidence and trends</i>	<i>Consequences for future baseline if no action taken</i>
Increase in the incidence of windstorms.	Average UK insured losses through windstorms are now £620 million per annum. Extreme storm events such as those in 1987, 1990, 2001 and 2007 may be more frequent.	This may result in loss of trees as a landscape feature, disruption to public services and damage to property.
<i>Climatic Change Mitigation and Energy</i>		
Performance of the energy efficiency of the existing housing and future build housing stock and of industrial premises.	A Renewable and Low Carbon Energy Study (AECOM 2013) was commissioned by the SDNPA during 2012. This identified opportunities for improving the energy performance of the existing building stock.	Increasing energy costs; failure to meet government targets; higher incidence of fuel poverty and business failures resulting from high fuel costs.
Opportunities to develop low carbon and renewable energy within the National Park consistent with SDNPA purposes.	Generation of electricity from renewable sources is increasing in the South East. In 2013, the region generated 5,550 GWh of electricity from renewable sources; equivalent to 14.3% of total energy consumption in the region, and the second highest of any region in England. Of this, 3,336 GWh were from wind, 965 GWh were from landfill gas, and 814 GWh were from other sources of bioenergy. These amounts more than exceed the 1,750 MW by 2026 ⁴¹ . The proposed Rampion Offshore Wind Farm Project – infrastructure for which will be located within the NP – will have an installed generating capacity of 665 MW and will make a significant contribution towards meeting the above targets. Total energy use within the SDNP has been estimated at 2,287,271MWh. Of this an estimated 5.6MWh p.a. is generated from renewable sources ⁴² .	Failure to take active measures to increase the contribution from renewable energy sources within the SDNP will mean that the SDNPA has failed in its role in supporting the transformation to a low carbon society and therefore its contribution to meeting the UK government target of sourcing 30% of all electricity from renewable sources by 2020.
There exists an opportunity to provide more effective valuation of the role of woodlands throughout the National Park to contribute to carbon abatement.	The management of the National Parks can play a key role in the addressing climate change and in leading others by demonstrating best practice. Woodland provides a significant contribution to carbon abatement.	Failure to effectively value this ecosystem service would run counter to carbon abatement efforts which are potentially significant given the importance of woodland to the SDNP.
<i>Community and well-being</i>		

⁴¹ South East Regional Spatial Strategy Saved Policies.

⁴² Aecom 2012. South Downs National Park Renewable and Low Carbon Energy Study.

<i>Key sustainability issues</i>	<i>Evidence and trends</i>	<i>Consequences for future baseline if no action taken</i>
Population structure of the SDNP increasingly dominated those aged 65 and over.	Older people, defined as those aged 65 and over, account for around 21 per cent of the population compared to 17 per cent in the South East region.	Facilities for young people become increasingly difficult to sustain because of out-migration of families that cannot afford to live in SDNP and the lack of employment opportunities in rural areas. This process is self-perpetuating without active intervention. Fewer working residents living in the National Park results in increased traffic movements and difficulty for employers to find local workforce to run services and facilities for the ageing population.
Rural areas affected by closure of village services, facilities and amenities.	Baseline data is not yet known, including percentage of the population within 2km of Post Office or 2km of Public House. Nationally, rural pubs close at a rate of 6 per week, whilst urban pubs are closing at a rate of 2 per week (CAMRA).	The continued loss of services and facilities is likely to have adverse effects on the vitality and viability of rural communities. Increased number of residents accessing services and facilities outside the community / National Park, increasing pressure on rural roads etc.
Cuts in local authority budgets affect grants to major organisations, village halls and public libraries and service delivery in cultural activity.	The current government plan has resulted in a cut of central funding to local authorities by 33% over four years 2011-2015 ⁴³ .	The continued loss of services and facilities is likely to have adverse effects on the vitality and viability of rural communities.
Urban areas adjacent to the National Park include pockets of poverty and poor health (see paragraph 0).	Mapping the indices of multiple deprivation (IMD) demonstrates that in terms of general deprivation, overall, this is low across the SDNP, but there are areas of higher deprivation around Brighton and Hove and Worthing, as well as pockets at Petworth and, notably, a large rural area of Lewes District.	Benefits of the National Park will not be realised without a suitable partnership strategy pursued through the Duty to Cooperate.

⁴³ Comprehensive Spending Review 2011-2015

<i>Key sustainability issues</i>	<i>Evidence and trends</i>	<i>Consequences for future baseline if no action taken</i>
Inequalities exist between different social groups in terms of both physical and educational access to the countryside and cultural facilities.	Although 10% of the population nationally is from a BME background, only 1% of visits to National Park are from a BME community (Campaign for National Parks). A pan-Sussex Review of Environment Centres by Sussex WT in 2007 suggests 24% facilities have grounds or interpretation suited for disabled access and 21% facilities for which transport to site is difficult or costly.	Some social groups visit National Parks less than others. Without effective Local Plan and Partnership Management Plan policies to address this, SDNPA would be failing in its responsibility to promote understanding and enjoyment to all sectors of society.
Incidences of rural crime in the South Downs National Park encompassing: Wildlife crime – poaching, hare coursing Anti-social behaviour – green laning, fly tipping, littering, illegal use of private land Farm crime – metal theft, fuel theft, equipment theft and disturbance to livestock	Anecdotal evidence from visitors' survey for land managers which identified rural crime as a key issue affecting landowners. Rural crime highlighted as a common issue in community led plans across the National Park. High numbers of people focused on some areas of the SDNP has led to recurring problems for some landowners and communities. These include injuries to sheep and disturbance to ground nesting birds by uncontrolled dogs, inconsiderate car parking, fly tipping and gates being left open.	Increased costs for landowners in replacing equipment and increased insurance premiums, with associated effects on the viability of farming. Cost of removing fly-tipping, negative impact on the special qualities of the National Park, impact on visitors / tourism.
<i>Economy</i>		
Economy – disconnected from the landscape/local area (out-commuting to jobs in surrounding towns/cities)	Approximately 22,400 residents in the National Park commute out to other destinations in the south east, including London ⁴⁴ . The population is dominated by the 'Countryside category' i.e. well off individuals living in rural or semi-rural location, mostly living in detached housing, working in agriculture or a professional capacity and often working from home.	Pattern of out-commuting does not foster strong locally-based rural economy, further undermining communities and local services. Increased trend of home working may however support daytime activities in some villages.

⁴⁴ South Downs National Park Authority, 2012. State of the National Park 2012

<i>Key sustainability issues</i>	<i>Evidence and trends</i>	<i>Consequences for future baseline if no action taken</i>
Many areas of the SDNP suffer from poor broadband access and this is a constraint to competitiveness in the online marketplace.	The 2012 State of the Park report recorded that there were very few places within the National Park with broadband speeds higher than 8Mb per second. The national BDUK programme is starting to address this with the roll out of superfast broadband (24Mbps). Final data on the outcome of Phase 1 of the BDUK programme across SDNP (aimed at achieving 90% with superfast connection) will be available in 2016 when Phase 1 completes; Hampshire and West Sussex also have Phase 2 extension programmes aimed at achieving 95% coverage. Modelling work commissioned by SDNPA, and other information, shows that areas of SDNP will definitely be in the last 5% not covered by the national programme. Pilots are being run/developed seeking solutions for these 'hard to reach' areas but there is no overall plan to achieve superfast coverage for the last 5%.	Any shortfall in achieving comprehensive (100%) superfast broadband coverage will constrain business growth in the National Park and the competitiveness of existing businesses.
Global market-driven forces influence agriculture within the National Park. This has resulted in increased intensity of agricultural activities.	Spending on agri-environment schemes nearly doubled between 2005/06 and 2009/10 – £4.567 to £8.305 million. Currently 57% of the National Park (93,561ha) is covered by agri-environment schemes, although this represents 66% agricultural land in the National Park.	Changing agriculture has affected the landscape and features of the South Downs in the past and will continue to do so in the future; recognition of this underpins the need for an ecosystem services approach that should include a realistic valuation of food production (strategic and social importance, not just farm-gate prices).
Deprivation within some limited areas of the National Park.	The South Downs is amongst the least deprived areas in England, with no areas falling within the 20% most deprived in England. Where deprivation does exist it is generally concentrated in urban areas with large social housing estates outside of, or on the edge of the Park boundary. ⁴⁵	The market towns will come under increased pressure for meeting future housing requirements and service provision.
<i>Housing</i>		

⁴⁵ Hampshire County Council and SDNPA, September 2011, Current Economic Indicators for the Local Economy of the South Downs National Park

<i>Key sustainability issues</i>	<i>Evidence and trends</i>	<i>Consequences for future baseline if no action taken</i>
Need for affordable housing stock.	There were approximately 3,043 households on housing waiting lists in the SDNP in 2014 which represents 6.4% of the 47,273 households in the SDNP recorded in the 2011 Census. This represents an increase of 20% on the number of households on local authority housing waiting lists in 2008 (DTZ, 2011).	Population will continue to age, loss of facilities will continue with a lack of younger population to fill local jobs. Increased development pressure on areas outside the National Park.
Need for accommodation for rural workers.	Generally house prices are higher in the National Park than surrounding urban areas, which tends to prevent those on low incomes from accessing housing. A high proportion of larger dwellings exacerbates this situation and can lead to unbalanced communities with young people and families unable to live in the National Park.	Increased inward commuting to fill rural jobs, fewer opportunities for people to find work locally, loss of rural skills.
Under provision of transit and permanent traveller sites.	Accommodation needs assessments have established a continuing need for new gypsy and traveller pitches within the National Park. They also established a need for additional transit pitches within the sub-region. Since these studies were carried out several sites have been granted permission across the National Park, providing additional pitches. This has met the identified need for new permanent pitches within Coastal West Sussex. A transit site of 9 pitches has been established within Chichester District which serves the whole of the West Sussex county area. Site identification work is being carried out with adjoining authorities to identify suitable sites to meet the unmet need within Hampshire and similar work to identify sites within East Sussex and Brighton and Hove will also need to be carried out.	Increase in illegal encampments due to insufficient suitable accommodation; potentially an increase in planning appeals.
Second home ownership/Holiday homes - decrease in resident population and support for local facilities	There is no firm data currently held on second home ownership. It was a matter raised in responses to the Options Consultation on the LP in 2014. However, it has not been a prominent issue in consultation on the LP, to date.	Increased house prices in rural areas impact on residents' ability to afford homes in their community Reduction in availability of houses locally to meet

<i>Key sustainability issues</i>	<i>Evidence and trends</i>	<i>Consequences for future baseline if no action taken</i>
Low capacity for settlements to accommodate new housing. Resistance from community. Locations for new housing often unsustainable.	The SHLAA undertaken by SDNPA in 2015 has demonstrated a shortage of sites that satisfy the criteria of being available, suitable and deliverable. Through the Neighbourhood Planning process some parishes have been reluctant to accept levels of housing consistent with the emerging LP although instances of this are generally isolated.	local need. De-population of small rural communities with subsequent impact of the viability of local services.
High value area causes houses to be enlarged, improved, replaced, reducing proportion of smaller, cheaper houses.	Average house price £330k (SDNPA, 2012) ⁴⁶ . Percentage of 3BR properties within SDNP. 40% homes are detached. 27% homes are semi-detached.	Without intervention there is a likelihood of increased loss of the stock of smaller houses and affordable homes. Potential to lead to higher waiting lists for affordable homes within SDNP.
Rural nature of community means that a higher than average percentage of the population are off the gas main. This can make domestic heating more costly with increased variability in prices.	19,535 homes of a total of 60,500 homes in the South Downs National Park are not connected to the gas main ⁵⁷ .	Long-term increasing fuel prices, particularly affecting oil and electricity potentially will result in an increasing number of households not able to heat homes appropriately.
<i>Transport</i>		
Poor public transport infrastructure within the SDNP.	Many areas in the SDNP have poor public transport accessibility, reflecting in particular a lack of bus service provision both within, and connecting to, the area. The poor public transport infrastructure is reflected in high dependence upon cars with 85% of households owning one car and an estimated 63% of the working population travelling to work by car. Subsidised bus services have been cut in all four Local Transport Authority areas within SDNP. Data suggests an average of 46 million visitor days spent in the South Downs, 83% of which are reliant upon cars.	Increasing dependence upon cars is not consistent with the low carbon economy that the SDNPA is seeking to develop. Poor public transport infrastructure combined with increasing numbers of visitors to the National Park will exacerbate problems of congestion on roads and adversely affect tranquillity. Lack of access to public transport results in social exclusion leaving vulnerable groups in rural areas without access to services that are readily available to residents with cars or those living in urban areas.

⁴⁶ South Downs National Park Authority State of the Park Report, 2012.

<i>Key sustainability issues</i>	<i>Evidence and trends</i>	<i>Consequences for future baseline if no action taken</i>
High dependence on cars by residents in / around SDNP with associated peak-time congestion and parking.	Car ownership levels are high with 85% of households owning at least one car and an estimated 63% of the working population travelling to work by car representing 7.76 million two way journeys annually.	Continued growth in car usage by communities in and around the National Park, combined with increased volume of traffic associated with visitors will exacerbate existing problems of congestion and car parking in the SDNP, undermining the National Park purposes. Particular issues are likely to be: <ul style="list-style-type: none"> • Managing access points to reduce negative impacts at hotspots; • Planning access points and interchanges to boost visits by sustainable means; and • Planning rights of way improvements in relation to access by sustainable means of travel.
High visitor dependence on cars makes car parking an issue particularly for popular destinations and for mass participation events, such as long distance runs / cycle rides.	In 2012, it was estimated that there were over 46 million visitor days spent in the South Downs. The majority of visitors, an estimated 83%, travelled by private motor vehicle.	
Some rail commuter routes will be at peak capacity by 2020.	By 2020 the Brighton Main Line service to London will be operating at 100% capacity.	An absence of a partnership approach involving LTAs and Network Rail as advocated by the SDNPA to address long-term shortfalls in rail capacity for London-South Coast routes and Coastway services. This may increase pressure for transport solutions which are inconsistent with SDNPA purposes and duty.
<i>Water</i>		

<i>Key sustainability issues</i>	<i>Evidence and trends</i>	<i>Consequences for future baseline if no action taken</i>
Water demand for both domestic and agricultural use exceeds supply, with resulting over-abstraction from aquifers / rivers affecting quality of water sources.	<p>Abstraction from both the Chalk and Lower Greensand aquifers across the National Park, already exceed the available natural resource (Environment Agency, 2012).</p> <p>Parts of the region are under serious water stress although the modelling by water companies indicates that water supplies will be secure (based on demand management measures being implemented).</p>	<p>The government target is to reduce per capita consumption (PCC) to 130 litres / day whereas current per capita consumption for the SDNP resource zones is 170 litres / day. However, all water companies are forecasting PCC reductions and no WRMP options relating to increased abstraction (i.e. above that already licensed) are being sought from chalk and lower greensand aquifers.</p>
	<p>15% streams and rivers in the SDNP have 'good' ecological status.</p> <p>44% streams and rivers in the SDNP have 'moderate' ecological status.</p> <p>41% streams and rivers in the SDNP have 'bad' ecological status. (Environment Agency, 2012).</p> <p>Key reasons for poor ecological status include the state of fish stocks, excessive phosphates in the water, and the impacts of abstraction.</p>	<p>Increasing pressure on abstraction will increase the vulnerability of surface water bodies and aquifers to a further deterioration in ecological status without adequate management measures to address these issues.</p> <p>Capacity at the Chichester (Tangmere) wastewater treatment plant is constrained but upgrade programme works are due to start in 2019 and will resolve this capacity constraint.</p> <p>There is ongoing regulatory pressure to reduce wastewater discharge volumes (especially to address the issue of high levels of phosphates) to promote improved status from 'Moderate' to 'Good'.</p>

Appendix C: Appraisal of Development Strategy Options

The following tables present appraisal findings in relation to the five development strategy options. These are organised by the twelve sustainability themes.

For each sustainability theme, a commentary on the likely effects (including significant effects) is presented. This is accompanied by an indication of whether likely 'significant effects' (using red / green shading) are likely to arise as a result of the option. Options are also ranked numerically reflecting their relative sustainability performance, with '1' the most favourable ranking and '5' the least favourable ranking.

Table B1: Appraisal findings, Landscape Sustainability Theme

Reasonable alternatives

Option 1: Dispersed High

Option 2: Dispersed Medium +60%

Option 3: Concentrated Medium

Option 4: Dispersed Medium

Option 5: Dispersed Medium- Sustainable Transport

The South Downs Integrated Landscape Character Assessment (SDILCA) undertaken for the South Downs National Park (updated 2011)⁴⁷ highlights there are a range of 'Forces for Change' affecting landscape character in the National Park. These have been identified as follows: development squeeze; traffic; changing agriculture; recreational pressures; development; climate change; and erosion of isolated island quality.

Due to the narrow area covered by the protected landscape of the National Park, **development squeeze** is an issue for landscape quality. This is largely as a result of development outside of the National Park, including on the coastal plain and in the Weald. As highlighted by the SDILCA, due to the narrowness of the SDNP in the eastern part of the National Park, this location has the greatest susceptibility to development squeeze.

In this context the Dispersed High option (Option 1) and the Dispersed Medium +60% option would direct a greater degree of development to the eastern part of the National Park, to locations including Findon, Ditchling, Pyecombe, Lewes, Kingston Near Lewes, Rodmell and Alfriston. This has the potential to further contribute to development squeeze at this sensitive location, with the potential for **significant negative cumulative effects** on landscape quality. To a lesser extent, the Sustainable Transport option (Option 5) may also lead to similar cumulative effects on this sensitive part of the National Park through increased levels of allocations in Southease, Alfriston, East Dean, Rodmell, Glynde, Kingston Near Lewes, Pyecombe and Findon. However, due to the smaller scale of development proposed through this option, effects under Option 5 are likely to be of a reduced magnitude when compared to Option 1.

In terms of **traffic**, the increased housing numbers proposed by the Dispersed High option (6,087 dwellings and Dispersed Medium +60% option (3,429) in comparison to the 2,578 dwellings proposed by the remaining three options) will lead to larger increases in traffic flows in the National Park. The Sustainable Transport option (Option 5), through focusing development on the settlements with the best connections by sustainable transport modes, will help limit effects on landscape quality from increases in traffic flows from development. The main effects on landscape character from traffic in the SDNP are from both the main north-south routes bisecting the National Park, specifically the M3, A3, A32, A23 and A24 and east-west on the A27 where it routes through or adjacent to the National Park. The options proposed are unlikely to, of themselves, lead to significant effects on landscape quality from additional increases in traffic. Rather, traffic increases on these routes are likely to result from an in-combination effect as a result of development outside of the National Park along the urban coastal fringe.

In terms of more specific effects on landscape quality from traffic, a notable influence on landscape quality from traffic in the western part of the National Park is from the A272. In this context Option 1 (Dispersed High) and Option 2 Dispersed Medium +60%) will focus an increased degree of development in settlements within the A272 corridor, including Petworth, Easebourne, Midhurst, Stedham, Rogate, Sheet, Petersfield and Stroud. This has the potential to lead to cumulative and synergistic impacts on landscape quality from an increase in traffic flows on the A272.

The effects of **climate change** on landscape in the National Park have the potential to be far reaching. This includes changes in landscape features such as characteristic biodiversity habitats, changes in land use, alterations to water resource use and a need to move towards renewable energy provision and carbon sequestration to meet climate change targets. In this context the effect of the five options will depend largely on the integration of measures within new development areas to protect and enhance landscape quality to help meet these challenges. However, it should be noted that where there is a larger scale of development, there is also a likely reduction of the ability of the landscape to adapt to the effects of climate change. This is due to a reduction in space to adapt and increased pressures on non-developed areas. As such, Option 1, through promoting a Dispersed High growth scenario and Option 2, through promoting a Dispersed Medium +60% scenario would do most to reduce the resilience of landscape to adapt to change. To a lesser extent the dispersed scenarios promoted through Options 4 and 5 may also lead to similar, but less pronounced effects.

In relation to effects on landscape from development, the SDILCA highlights that incremental, small-scale change with gradual erosion of local rural character is a key concern. In this context the Dispersed High option (Option1) and the Dispersed Medium +60% (Option 2), through amplifying the scale and distribution of development amongst a wider number of settlements (including, outside of the five main settlements of the

⁴⁷ LUC (updated 2011) Integrated Landscape Character Assessment

Reasonable alternatives

Option 1: Dispersed High

Option 2: Dispersed Medium +60%

Option 3: Concentrated Medium

Option 4: Dispersed Medium

Option 5: Dispersed Medium- Sustainable Transport

National Park, within 40 villages), has increased potential to lead to **significant negative effects** on local rural character.

Through facilitating an increased degree of development at the five main settlements in the National Park (Lewes, Liss, Midhurst, Petworth and Petersfield), Option 1, Option 2, Option 3 and Option 5 all have the potential to lead to **significant negative effects** on landscape character in the vicinities of these towns / villages. Whilst Option 3 focuses all development under a medium growth scenario to these settlements, Options 1 and 5 both promote a higher level of development in these locations. As such, Option 1 has increased potential for significant effects, whilst Option 3 will limit effects on landscape character elsewhere in the SDNP through not allocating new development within other settlements in the National Park. Under Option 4, overall effects on landscape character have the potential to be more limited. For Options 4 and 5, significant effects on landscape character depend on the location and layout of new development and the incorporation of measures such as high quality design and green infrastructure provision to minimise effects on landscape character and secure enhancements.

As highlighted by the SDILCA, *"The South Downs has a strong 'island' quality and sense of separateness/difference from the surrounding landscape. This is both as a result of the upstanding a prominent landform which rises from the Weald and coastal plain, long views out, as well as the very real contrasts between the South Downs and adjacent areas."* In this context the 'erosion of isolated island quality' is more likely to take place with the higher quantum of development and increased dispersal of development proposed through Option 1 and Option 2. This is due to increased loss of land and the potential for visual and physical conglomeration of settlements' distinctiveness.

In terms of potential effects from recreational pressures and changing agricultural practice on landscape quality this will be largely dependent on agricultural practices (e.g. the shift to 'sustainable intensification') and the development of infrastructure for the visitor and tourism economy rather than the quantum and distribution of new housing. As such it is uncertain the extent to which each of these options will affect landscape quality in relation to the 'Forces for Change' identified by the SDILCA.

A further key consideration relates to potential effects on dark night skies and tranquillity in the National Park, which are two closely linked elements centrally relevant to landscape quality and visual amenity. The largest influences on these elements relate to the presence of the built up area on the south coast (including related to Eastbourne, Brighton, Worthing, Chichester and the south Hampshire conurbation) and the effects of other individual settlements surrounding the National Park (including Winchester, Alton, Haslemere, Liphook, Bordon, Storrington and Burgess Hill / Hurstpierpoint). Within the SDNP the main inputs to light pollution include the settlements of Petersfield, Liss, Midhurst and Lewes and road corridors (see above under 'traffic').

A band of the National Park extending eastwards from the south east of Petersfield to Storrington has been established as including some of the most tranquil areas in the South Downs⁴⁸. A further area of high tranquillity is located within the northern strip of the National Park which extends to the south west of Farnham. In this context the options which direct a larger degree of development to South Harting, Compton, East Dean, Bury, Amberley, and Binsted and Selborne (Option 1 and 2 and to a lesser extent, Option 4 and 5) have increased potential to have effects on tranquillity and light pollution at these locations.

Overall, in terms of tranquillity and dark night skies, an increased quantum of development and the increased dispersal of development proposed through Option 1 has the most potential to lead to **significant negative effects** on landscape quality from light pollution and loss of tranquillity. Option 3, through focussing development on the five main settlements of the National Park, will erode tranquillity in the vicinity of these settlements but is likely to limit effects on tranquillity elsewhere in the National Park.

Landscape Sustainability Theme: Summary of options' rank

Option 1	5	Option 2	4	Option 3	3	Option 4	1	Option 5	2
----------	---	----------	---	----------	---	----------	---	----------	---

⁴⁸ Source: SNDPA (2012), State of the National Park 2012

Agenda Item 12 Report NPA14/17 Appendix 3

SA Report to accompany
Pre-Submission consultation: Appendices

<i>Options with likely significant positive effects</i>	
<i>Options with likely significant negative effects</i>	
<i>Options with no likely significant effects</i>	
<i>Rankings: from 1 (most favourably performing) to 5 (least favourably performing)</i>	1-5

Table B2: Appraisal findings, Climate Change Adaptation Sustainability Theme

Reasonable alternatives									
<i>Option 1: Dispersed High</i>									
<i>Option 2: Dispersed Medium +60%</i>									
<i>Option 3: Concentrated Medium</i>									
<i>Option 4: Dispersed Medium</i>									
<i>Option 5: Dispersed Medium- Sustainable Transport</i>									
<p>The ability of the development options to influence climate change adaptation, is assessed principally in relation to flood risk and water supply, owing to the limitations in data to assess other aspects of adaptation. In relation to flood risk, the Water Cycle Study (WCS) / Strategic Flood Risk Assessment (SFRA) undertaken for the SDNP⁴⁹ has identified that a number of the settlements proposed for development through the five options are subject to flood risk. The key locations with flood risk issues identified in the National Park by the SFRA are: Lewes (combined fluvial and tidal flood risk relating to the River Ouse including tidal locking, groundwater flooding, surface water flooding and sewerage flooding); Petersfield (fluvial flood risk from the upper River Rother and tributaries, surface water flooding, sewerage flooding and some groundwater flooding); and Liss (fluvial flood risk from upper River Rother and tributaries, and surface water flooding).</p> <p>In terms of Lewes, Option 1 (1,677 dwellings), Option 2 (672 dwellings) and Option 3 (626 dwellings) are likely to lead to increased pressures for development at locations with elevated flood risk. Similarly in Petersfield, Option 5 (820 dwellings) and Options 1 to 3 (805 dwellings) have the potential to increase the likelihood of development in unsuitable locations in comparison to Option 4 (700 dwellings). In terms of Liss, Options 1, 2, 3 and 5 all propose elevated levels of housing development (220 dwellings) in comparison to Option 4 (150 dwellings). Overall, the Dispersed High option (which proposes 6,087 dwellings in comparison to the 3,429-2,578 dwellings proposed by the other four options) may lead to additional pressures for development at locations with elevated issues relating to flood risk.</p> <p>Whilst a number of the options have the potential to lead to elevated levels of flood risk at locations where the SFRA has highlighted particular issues, it is considered that the provisions of the NPPF and national policy in relation to flooding will help guide development away from flood risk areas and ensure that appropriate mitigation measures are implemented. For example the NPPF does not permit development within flood risk areas or where the effect would be to increase flood risk elsewhere. Likewise, adherence to the recommendations and guidance presented in the WCS / SFRA, and the provisions of future documents to be prepared in the National Park, including the Level 2 SFRA for Lewes and the Surface Water Management Plans to be prepared for Petersfield and Liss, will help limit effects.</p> <p>In relation to water supply, the Environment Agency in 2013 classified supplies in the Southern Water and South East Water areas as under "Serious Stress" and supplies in the Portsmouth Water area as "Moderate". However, the WCS has highlighted that, provided water companies implement their proposed Water Resource Management Plans effectively, there are no significant issues which would impact on the ability to meet the supply needs of the new development. In this respect it is not anticipated that the scale and location of development proposed through any of the options will be undeliverable. It should be noted however that the increased scale of development through the Dispersed High option (Option 1) will lead to increased water demand in the National Park in comparison with the other options.</p> <p>In terms of coastal zone management the proposed development strategies put forward through the five options limit development within the coastal areas of the National Park in East Sussex.</p>									
Climate Change Adaptation Sustainability Theme: Summary of options' rank									
<i>Option 1</i>	5	<i>Option 2</i>	4	<i>Option 3</i>	2	<i>Option 4</i>	1	<i>Option 5</i>	2
<i>Options with likely significant positive effects</i>									
<i>Options with likely significant negative effects</i>									
<i>Options with no likely significant effects</i>									
<i>Rankings: from 1 (most favourably performing) to 5 (least favourably performing)</i>									1-5

⁴⁹ Amec (December 2014) Water Cycle Study and SFRA Level 1, Scoping and Outline Report

Table B3: Appraisal findings, Biodiversity Sustainability Theme

Reasonable alternatives

Option 1: Dispersed High

Option 2: Dispersed Medium +60%

Option 3: Concentrated Medium

Option 4: Dispersed Medium

Option 5: Dispersed Medium- Sustainable Transport

Numerous internationally and nationally designated nature conservation sites are present within and in close proximity to the SDNP. Within the National Park, these include one RAMSAR site, 13 SACs, two SPAs, 86 SSSIs and nine National Nature Reserves. There are also over 850 locally designated sites in the National Park, designated as either Local Wildlife Sites, Sites of Nature Conservation Importance (SNCIs) or Sites of Importance for Nature Conservation (SINCs). This reflects the presence of a rich variety of habitats that support a range of rare and internationally important species in the National Park.

Whilst the significance of the effects from each option on features and areas of biodiversity interest largely depends on the location, scale and nature of development and the incorporation of biodiversity enhancement measures, it can be considered that a higher level of housing development within a settlement increases the likelihood (and potential magnitude) of negative effects. This is linked to an increased likelihood of direct effects, such as from land take, disturbance or the loss of key features of ecological value, and an increased likelihood of indirect effects, such as from a reduction of ecological connectivity, changes in land use patterns or increased traffic flows.

In terms of the larger settlements in the National Park, the options (Options 1, 2 and 3) which promote a higher degree of development at these locations have increased potential for effects on the internationally and national designated sites present in the vicinity of these towns and villages.

In the vicinity of **Lewes** this includes potential effects on the Lewes Downs SAC/SSSI, the Offham Marshes SSSI, the Clayton to Offham Escarpment SSSI, the Lewes Brooks SSSI and the Southerham Grey Pit SSSI. Reflecting these sensitivities, the whole of the town is located within an SSSI Impact Risk Zone for housing developments of over 100 dwellings. In this context the larger scale of allocations proposed by Option 1 (1,677 dwellings), Option 2 (672 dwellings) and Option 3 (626 dwellings) have increased potential to lead to **significant negative effects** relating to potential impacts on the internationally and nationally designated sites present in the vicinity of Lewes.

Internationally designated nature conservation sites present in the vicinity of **Petersfield** include the East Hampshire Hangers SAC and the Wealden Edge Hangars SSSI. However only a small part of the north west part of the town (at Bell Hill) is within the SSSI Impact Risk Zone for larger scale housing development (housing developments of over 100 dwellings). In this context whilst Option 5 (820 dwellings) and Options 1 to 3 (805 dwellings) have the potential to increase the likelihood of effects on these designated nature conservation sites, significant effects are likely to be minimised by the location and relative distance of these sites to the town.

In the vicinity of **Midhurst** nationally designated sites include Iping Common SSSI and Ambersham Common SSSI. The SSSIs' Impact Risk Zones (for residential developments of over 50 dwellings or more) skirt either side of the town. In this respect the likelihood of significant effects depends on the location and scale of development sites. Overall however, it can be considered that Option 1 (599 dwellings) and Option 3 (264 dwellings) have the potential to lead to an increased magnitude of effects.

In **Petworth** the Mens SAC is located between 3.6 and 7.3km from the centre of the town. Due to the reduced sensitivity of the location, this limits the likelihood of significant negative effects taking place. The zone of influence for bat commuting / foraging habitat is assessed at 7km and therefore, development within Petworth has the potential for adverse effects. However, compliance with policy SD13 (International Sites) of the LP would avoid significant adverse effects.

In terms of **Liss**, the Wealden Heaths Phase 2 SPA and Woolmer Forest SSSI are present close to the village. As such 90% of the settlement is covered by an SSSI Risk Zone for 'any residential developments with a total net gain in residential units' with the remaining areas covered by the Impact Risk Zone for 'residential development of 10 units or more'. In this respect the likelihood of **significant negative effects** from new development in the village is high. Of the four options, Option 4, through proposing 150 dwellings rather than 220 dwellings (as proposed by Options 1, 2, 3 and 5) has the potential to have fewer impacts on these sites.

In terms of the nature conservation designations located in the vicinity of the smaller settlements in the National Park, the likelihood for significant effects may be limited by the scale of allocations at most of the locations

Reasonable alternatives

Option 1: Dispersed High

Option 2: Dispersed Medium +60%

Option 3: Concentrated Medium

Option 4: Dispersed Medium

Option 5: Dispersed Medium- Sustainable Transport

proposed through the options. However, this does not preclude the possibility of significant negative effects on biodiversity in the vicinity of these settlements resulting from Option 1 (which directs a highest scale of development to the larger range of settlements) and Options 4 and 5 (which take a dispersed approach to the delivery of a medium growth scenario).

It should also be noted that the potential for significant negative effects cannot be excluded for any of the options without increased clarity on the potential location and scale of development sites. In this context it is recognised that these elements cannot be determined in detail for the five options due to the broad strategic nature of the options and as such the significance of effects are uncertain. In terms of European designated sites (including SACs and SPAs) the Habitats Regulations Assessment currently being undertaken for the Local Plan will help limit any significant effects relating to these sites through the implementation of avoidance and mitigation measures where appropriate.

Biodiversity Sustainability Theme: Summary of options' rank

Option 1	5	Option 2	4	Option 3	3	Option 4	1	Option 5	2
----------	---	----------	---	----------	---	----------	---	----------	---

Options with likely significant positive effects

Options with likely significant negative effects

Options with no likely significant effects

Options with uncertain significant effects

Rankings: from 1 (most favourably performing) to 5 (least favourably performing)

1-5

Table B4: Appraisal findings, Cultural Heritage Sustainability Theme

Reasonable alternatives

Option 1: Dispersed High

Option 2: Dispersed Medium +60%

Option 3: Concentrated Medium

Option 4: Dispersed Medium

Option 5: Dispersed Medium- Sustainable Transport

The South Downs National Park has a rich historic environment, with numerous features and areas of cultural heritage and archaeological significance. This includes 166 conservation areas, over 5,000 nationally listed buildings, 616 scheduled monuments and 30 Registered Parks and Gardens. Approximately 60 features and nine conservation areas are deemed to be 'at risk'.

A higher level of housing development within a settlement increases the likelihood (and potential magnitude) of negative effects in relation to the Cultural Heritage theme. This is due to an increased likelihood of direct effects on the historic environment, such as from the loss of key assets, land take or effects on the setting of an asset or area of sensitivity. Indirect effects, such as from changes in road traffic flows or land use patterns are also more likely to take place with an increased level of development.

In this context an increased scale of development proposed for the five primary towns and villages of the National Park through Options 1, 2, 3 and 5 (Lewes, Petersfield, Midhurst, Petworth and Liss) has the potential to have **significant negative effects** on the historic environment of these settlements without the implementation of careful design and layout and appropriate locational policies. However Option 3 will also, through exclusively focussing effects on the five larger settlements in the SDNP, help limit direct impacts from new development on the remaining settlements in the National Park. In terms of Options 1, 2, 4 and 5, these options will lead to varying degrees of development in the smaller settlements in the National Park. However Option 1 and Option 2 have the potential to lead to the largest magnitude of effects in the settlements due to the larger growth to be delivered in these villages.

Whilst a larger quantum of development in a settlement has the potential to increase the magnitude of effects on the fabric and setting of the historic environment, in the context of the National Park a key consideration in relation to the historic environment is the potential for new development to 1) support enhancements to the quality of the built environment 2) facilitate enhancements to the setting of the historic environment and 3) the potential for development areas to contribute to the rejuvenation of historic environment assets, including those deemed to be 'at risk'. This is a central element in relation to supporting and enhancing the special qualities of the National Park.

In this respect, the limiting of new development in the majority of villages in the South Downs through Option 3 reduces the scope for enhancements to be made to the setting of cultural heritage assets and the rejuvenation of existing features and areas of historic environment interest. This limits the potential for enhancements to be secured to cultural heritage assets (including conservation areas) through developer contributions and similar mechanisms, although this is less of an issue with CIL. Irrespective, opportunities for enhancements to be made to the setting and fabric of features and areas of historic environment value are considered to be somewhat limited under Option 3.

In terms of Options 4, effects on the historic environment will depend on the location, design and layout of new development. However the broader spread of development proposed and avoidance of levels of development likely to have significant impacts upon the townscape of the core settlements, will enable a wider range of cultural heritage assets to benefit from enhanced utilisation of such assets (including through a contribution to the vitality of settlements), high quality and sensitive design and contributions to enhancements to the fabric and setting of historic environment assets.

Cultural Heritage Sustainability Theme: Summary of options' rank

<i>Option 1</i>	4	<i>Option 2</i>	3	<i>Option 3</i>	5	<i>Option 4</i>	1	<i>Option 5</i>	2
-----------------	---	-----------------	---	-----------------	---	-----------------	---	-----------------	---

Table B5: Appraisal findings, Cultural Activity Sustainability Theme

Reasonable alternatives									
<i>Option 1: Dispersed High</i>									
<i>Option 2: Dispersed Medium +60%</i>									
<i>Option 3: Concentrated Medium</i>									
<i>Option 4: Dispersed Medium</i>									
<i>Option 5: Dispersed Medium- Sustainable Transport</i>									
<p>Cultural activity in the National Park is closely linked to the vitality of communities. In particular, the larger settlements enable a greater variety of cultural activities to be supported. In this context through delivering a larger degree of development to Lewes, Petersfield, Midhurst, Petworth and Liss, Options 1, 2, 3 and 5 will promote an additional range of cultural activities. This will also support visitor offer in these towns and villages.</p> <p>In relation to smaller settlements in the National Park, the delivery of housing locally has the potential to support villages' services and facilities through increases in the local population. This will help to improve the settlement's vitality and viability through promoting increased offer locally, with the potential to support cultural activity. In this respect, Options 1, 2, 4 and 5 will promote cultural activity in locations outside of the five larger settlements through facilitating various degrees of development. This is a central consideration for this theme, as the smaller settlements of the SDNP are fundamentally important to the vitality of the National Park.</p> <p>Cultural activity and the visitor economy in the National Park are also closely linked to its landscape, setting, cultural heritage and local distinctiveness. In this context, Option 1, which proposes 6,087 dwellings in comparison to the 3,429-2,578 dwellings proposed by the other four options, has the most potential to undermine the special qualities of the National Park through increased levels of housing development.</p> <p>It should also be noted though that many of the smaller settlements in the SDNP are important centres for the tourism economy. For example, 13% of visitor nights to the National Park in 2003/4 were in Alfriston. Therefore a key element relating to this Sustainability Theme will be to achieve an effective balance between supporting the vitality and viability of a settlement and protecting and enhancing the natural and built environment.</p> <p>In light of the above consideration, Option 5, which promotes a dispersed approach to development whilst also focussing on the settlements with good accessibility by sustainable transport modes, will support a robust and sustainable visitor and tourism economy and an increased range of (and accessibility to) cultural activities. This is likely to lead to a range of positive effects in relation to this theme.</p>									
Cultural Activity Sustainability Theme: Summary of options' rank									
<i>Option 1</i>	4	<i>Option 2</i>	3	<i>Option 3</i>	5	<i>Option 4</i>	2	<i>Option 5</i>	1
<i>Options with likely significant positive effects</i>									
<i>Options with likely significant negative effects</i>									
<i>Options with no likely significant effects</i>									
<i>Rankings: from 1 (most favourably performing) to 5 (least favourably performing)</i>									1-5

Table B6: Appraisal findings, Health and Wellbeing Sustainability Theme

Reasonable alternatives									
<i>Option 1: Dispersed High</i>									
<i>Option 2: Dispersed Medium +60%</i>									
<i>Option 3: Concentrated Medium</i>									
<i>Option 4: Dispersed Medium</i>									
<i>Option 5: Dispersed Medium- Sustainable Transport</i>									
<p>Health and wellbeing in the National Park is closely related to a number of factors, including accessibility to services and facilities, the use of healthier modes of travel, access to high quality green infrastructure provision, the quality of housing, levels of crime and security and optimising the benefits that the natural environment offers to the health-and wellbeing of residents and visitors.</p> <p>Accessibility to services and facilities is a key influence on health and wellbeing. In this respect the options which direct an increased level of housing provision to the five largest settlements in the National Park (Lewes, Petersfield, Midhurst, Petworth and Liss) will enhance accessibility through directing housing to the settlements with the broadest range of services and facilities. This will support accessibility to the wider range of health services and leisure and recreational facilities in these settlements, with benefits for the health and wellbeing of residents. Locating a higher proportion of housing in closer proximity to the amenities in the larger settlements will also encourage healthier modes of travel including walking and cycling.</p> <p>In relation to the smaller settlements in the National Park, the options which promote a more dispersed pattern of development (Options 1, 2, 4 and 5) will support the viability of local services in these settlements, promoting accessibility to these facilities. In this context, through limiting development to the five largest settlements in the SDNP, Option 3 is unlikely to support existing health services and leisure and recreational facilities in the smaller settlements in the National Park or facilitate the development of new amenities. Option 3 is also less likely to support enhancements to green infrastructure networks or walking and cycling routes in these settlements through limiting opportunities for developer contributions. This has the potential to have negative effects in relation to the health and wellbeing of residents in these settlements. In certain settlements, an increase in population may increase pressures on existing health services without an improvement in capacity of such services.</p> <p>Option 5, through locating new development in the settlements with good sustainable transport links will also support accessibility to health services and leisure and recreational facilities.</p> <p>Healthier lifestyles are also closely linked to optimising the benefits that the natural environment offers to the health-and wellbeing of residents and visitors. In this respect Option 1, which proposes 6,087 dwellings in comparison to the 3,429-2,578 dwellings put forward by the other four options, has the most potential to undermine the special qualities of the SDNP through increased levels of housing development, and impacts on the National Park's landscape, setting, cultural heritage and local distinctiveness. The other options, through providing a lower quantum of development, will provide greater scope for mitigating and avoiding effects from new development on the special qualities.</p> <p>Effects on health and wellbeing will also depend on factors such as the provision of new services and facilities to accompany new development, the quality and energy efficiency of new housing, and enhancements to open space provision and green infrastructure networks, including pedestrian and cycle links. These elements will in large part depend on the policy approaches taken forward through the SDLP.</p>									
Health and Wellbeing Sustainability Theme: Summary of options' rank									
<i>Option 1</i>	3	<i>Option 2</i>	4	<i>Option 3</i>	5	<i>Option 4</i>	1	<i>Option 5</i>	1
<i>Options with likely significant positive effects</i>									
<i>Options with likely significant negative effects</i>									
<i>Options with no likely significant effects</i>									
<i>Rankings: from 1 (most favourably performing) to 5 (least favourably performing)</i>									1-5

Table B7: Appraisal findings, Vitality of Communities Sustainability Theme

Reasonable alternatives									
<i>Option 1: Dispersed High</i>									
<i>Option 2: Dispersed Medium +60%</i>									
<i>Option 3: Concentrated Medium</i>									
<i>Option 4: Dispersed Medium</i>									
<i>Option 5: Dispersed Medium- Sustainable Transport</i>									
<p>New development in the National Park will support settlements' vitality through promoting the viability of local services and facilities, enhancing local economic offer and supporting cultural activities.</p> <p>Option 3, through focussing new development on Lewes, Petersfield, Midhurst, Petworth and Liss is least likely of the four options to support the vitality of smaller settlements in the National Park. In this context the viability of services and facilities in these settlements will be undermined through a limitation of the ability of the local population to support these amenities. However, it should also be noted that in certain settlements, an increase in population may increase pressures on existing services and facilities without an improvement in capacity of such amenities.</p> <p>The vitality of settlements is closely linked to the demographic make-up of residents. For example younger people are increasingly likely to be priced out of a number of villages in the South Downs through Option 3, which limits development in smaller settlements in the National Park. This will have effects on community vitality by limiting the diversity of age ranges present in a village and reducing the viability of facilities such as local schools. The vitality of settlements is also supported by housing development through increasing the local market for goods and services. Option 3 will therefore limit economic opportunities linked to population increases.</p> <p>For these reasons, Option 3 has the potential to lead to significant negative effects on the vitality of a number of communities in the National Park.</p> <p>In terms of the other options, Option 1 will lead to the largest increase in population in the National Park. This will support the vitality of a wider range of settlements. Likewise Options 2 and 4 will also support vitality through promoting a dispersed approach to growth. Option 5, through directing housing provision to the settlements which are best connected by sustainable transport modes will promote the vitality of these towns and villages. Positive effects on these settlements' vitality are likely to be further supported through synergistic effects linked to the accessibility of these locations by sustainable transport modes, which will encourage those who live outside of these settlements to access services and facilities in the town / village.</p> <p>Due to the above factors, all four of Options 1, 2, 4 and 5 have the potential to support significant positive effects in relation to community vitality.</p>									
Vitality of Communities Sustainability Theme: Summary of options' rank									
<i>Option 1</i>	1	<i>Option 2</i>	2	<i>Option 3</i>	5	<i>Option 4</i>	3	<i>Option 5</i>	4
<i>Options with likely significant positive effects</i>									
<i>Options with likely significant negative effects</i>									
<i>Options with no likely significant effects</i>									
<i>Rankings: from 1 (most favourably performing) to 5 (least favourably performing)</i>									1-5

Table B8: Appraisal findings, Accessibility Sustainability Theme

Reasonable alternatives									
<i>Option 1: Dispersed High</i>									
<i>Option 2: Dispersed Medium +60%</i>									
<i>Option 3: Concentrated Medium</i>									
<i>Option 4: Dispersed Medium</i>									
<i>Option 5: Dispersed Medium- Sustainable Transport</i>									
<p>Accessibility to services and facilities is a key influence on community cohesion, settlement vitality, health and wellbeing and the quality of life of residents.</p> <p>Options 1, 2, 3 and 5 which direct an increased level of housing provision to the five largest settlements in the National Park (Lewes, Petersfield, Midhurst, Petworth and Liss) will promote accessibility through directing housing to the settlements with the broadest range of services and facilities. This will support accessibility to the wider choice of amenities present in these locations. Locating a higher proportion of housing in closer proximity to these amenities will also encourage the use of sustainable modes of transport, including walking and cycling and public transport. This will in turn support the development of new and enhanced transport links and promote accessibility for those without access to a car.</p> <p>In relation to the smaller settlements in the National Park, the options which promote a more dispersed pattern of development (Options 1, 2, 4 and 5) will support the viability of local services in these settlements. This will promote local residents' accessibility to these facilities. In this context, through limiting development to the five largest settlements in the SDNP, Option 3 is unlikely to reinforce support for existing services and facilities in the smaller settlements in the National Park. The scope for new amenities is in any case likely to be small in scale given the quantity of housing proposed for villages in the National Park. For those living in the smaller settlements of the National Park, this could limit accessibility to local amenities in the longer-term.</p> <p>Through limiting opportunities for developer contributions, Option 3 is also less likely to support enhancements to green infrastructure networks or walking and cycling routes in these settlements. This has the potential to limit improvements which will improve access for those without access to a car.</p> <p>In relation to this Sustainability Theme, Option 5 is the best performing. Through both 1) supporting existing services in smaller settlements, and 2) locating new development in the core settlements with good sustainable transport links, thereby promoting access by non-car modes to services and facilities. This will lead to some positive effects in relation to this Sustainability Theme but this is tempered by the fact that the option will not, in all cases, promote accessibility through directing housing to the settlements with the broadest range of services and facilities.</p>									
Accessibility Sustainability Theme: Summary of options' rank									
<i>Option 1</i>	2	<i>Option 2</i>	3	<i>Option 3</i>	5	<i>Option 4</i>	4	<i>Option 5</i>	1
<i>Options with likely significant positive effects</i>									
<i>Options with likely significant negative effects</i>									
<i>Options with no likely significant effects</i>									
<i>Rankings: from 1 (most favourably performing) to 5 (least favourably performing)</i>									1-5

Table B9: Appraisal findings, Sustainable Transport Sustainability Theme

Reasonable alternatives									
<i>Option 1: Dispersed High</i>									
<i>Option 2: Dispersed Medium +60%</i>									
<i>Option 3: Concentrated Medium</i>									
<i>Option 4: Dispersed Medium</i>									
<i>Option 5: Dispersed Medium- Sustainable Transport</i>									
Options 1, 2, 3 and 5 which direct an increased level of housing provision to the five largest settlements in the National Park (Lewes, Petersfield, Midhurst, Petworth and Liss) will promote accessibility through directing housing to the settlements with the broadest range of services and facilities. This will encourage the use of sustainable modes of transport, including walking and cycling and public transport. Supporting this further, an increased level of housing will support enhancements to public transport and pedestrian and cycle links in the larger settlements in the National Park through developer contributions.									
In relation to the smaller settlements in the National Park, the options which promote a more dispersed pattern of development (Options 1, 2, 4 and 5) will support the viability of local services in these settlements and reduce the need to travel for local residents. In this context, through limiting development to the five largest settlements in the SDNP, Option 3 is less likely to support existing services and facilities in the smaller settlements in the National Park and may increase the need to travel for those living in these villages.									
Option 3 is also less likely to support enhancements to green infrastructure networks, including walking and cycling routes or new and improved public transport links in smaller settlements through limiting opportunities for developer contributions.									
The options which support improved vitality in smaller settlements in the National Park (Options 1, 2, 4 and 5) have the potential to limit traffic flows by reducing the need for people to travel to services, facilities and employment in the National Park. This is due to the options providing a wider range of housing types and tenures and the options' support for the viability of existing amenities and employment opportunities. In this context, through enabling housing provision to take place in a wider range of locations, Options 1, 2, 4 and 5 (provided new housing helps meet local need) will enable residents to access services, amenities and employment locally. This will reduce the need to travel by private car.									
In terms of traffic flows, Option 1, which proposes 6,087 dwellings in comparison to the 3,429-2,578 dwellings put forward by the other three options, has the most potential to lead to increases in traffic and congestion in the National Park. However, this may in part be limited by a reduction in the need for residents to travel to employment and services and facilities (see above).									
Option 5, through facilitating development across a wider range of settlements, and locating new development in the settlements with good sustainable transport links, will promote access by non-car modes. This will support the use of sustainable modes of transport, including train and bus use and walking and cycling. This could lead to significant positive effects in relation to this Sustainability Theme.									
Sustainable Transport Sustainability Theme: Summary of options' rank									
<i>Option 1</i>	2	<i>Option 2</i>	3	<i>Option 3</i>	4	<i>Option 4</i>	4	<i>Option 5</i>	1
<i>Options with likely significant positive effects</i>									
<i>Options with likely significant negative effects</i>									
<i>Options with no likely significant effects</i>									
<i>Rankings: from 1 (most favourably performing) to 5 (least favourably performing)</i>									1-5

Table B10: Appraisal findings, Housing Sustainability Theme

Reasonable alternatives									
<i>Option 1: Dispersed High</i>									
<i>Option 2: Dispersed Medium +60%</i>									
<i>Option 3: Concentrated Medium</i>									
<i>Option 4: Dispersed Medium</i>									
<i>Option 5: Dispersed Medium- Sustainable Transport</i>									
<p>Affordable housing is a key issue in the SDNP. There were estimated approximately 3,780 households on the waiting list in the National Park in 2010, representing around 5% of all households. Between 2008 and 2010 there was a 49% increase in the number of households on the list (DTZ, 2011). Through limiting development to the five main settlements in the National Park, Option 3 is unlikely to meet localised demands for affordable housing in smaller settlements. This has the potential to lead to significant negative effects in relation to rural housing provision. In contrast, Options 1, 2, 4 and 5 may help deliver affordable housing in a broader range of settlements, which will help to meet localised needs. However, a more dispersed approach to housing provision may undermine the viability of affordable housing delivery in some instances through reducing the size of housing developments to a level below which the development of affordable housing on site is not required. In this respect Option 3 might generate more affordable housing than the more dispersed options which are likely to rely on more atypical means to provide affordable housing (rather than the standard model of affordable housing being provided alongside market housing).</p> <p>In terms of the delivery of housing for those with particular requirements, such as older people, younger families or those with disabilities, Options 1, 2, 4 and 5 will do more to help deliver appropriate housing provision in smaller settlements. However, the extent to which housing is delivered of a type and tenure which meets local requirements depends largely on the implementation of appropriate policy approaches through the Local Plan (and where present, Neighbourhood Development Plans).</p> <p>Given that the growth scenario proposed through Options 1 and 2 would facilitate an increase in housing above that of historic housing delivery, these options would likely have positive effects in terms of helping the National Park to deliver housing which meets local requirements, both affordable and market.</p> <p>By virtue of delivering a larger supply of housing, higher growth scenarios have increased potential to meet housing needs in the SDNP. In this respect Option 1, and to a lesser extent, Option 2, through delivering a higher quantum of development across a wider range of settlements in the National Park, and facilitating housing growth which more closely reflects population trends, will do most to deliver a wider range of housing which meets a variety of needs. This will support significant positive effects in terms of helping the National Park to meet objectively assessed housing needs.</p>									
Housing Sustainability Theme: Summary of options' rank									
<i>Option 1</i>	1	<i>Option 2</i>	2	<i>Option 3</i>	5	<i>Option 4</i>	3	<i>Option 5</i>	3
<i>Options with likely significant positive effects</i>									
<i>Options with likely significant negative effects</i>									
<i>Options with no likely significant effects</i>									
<i>Rankings: from 1 (most favourably performing) to 5 (least favourably performing)</i>									1-5

Table B11: Appraisal findings, Climate Change Mitigation Sustainability Theme

Reasonable alternatives									
<i>Option 1: Dispersed High</i>									
<i>Option 2: Dispersed Medium +60%</i>									
<i>Option 3: Concentrated Medium</i>									
<i>Option 4: Dispersed Medium</i>									
<i>Option 5: Dispersed Medium- Sustainable Transport</i>									
<p>In terms of greenhouse gas emissions, road transport is an increasingly significant contributor to emissions in the National Park. This is due in part to high car dependence, both within the National Park and in surrounding areas, which is stimulated by the dispersed nature of settlements and facilities and limited public transport infrastructure. An estimated 85% of residents own at least one car and an estimated 63% of the working population travel to work by car.</p> <p>The extent to which the five options have the potential to support climate change mitigation through facilitating a reduced level of car dependency is therefore a key element. In this context, Option 1, 2, 3 and 5 which direct an increased level of housing provision to the five largest settlements in the National Park (Lewes, Petersfield, Midhurst, Petworth and Liss) will promote accessibility through directing housing to the settlements with the broadest range of services and facilities. This will encourage the use of lower carbon modes of transport, including walking and cycling and public transport. Supporting this further, an increased level of housing will support enhancements to public transport and pedestrian and cycle links in the larger settlements in the National Park through developer contributions. This will further help limit emissions from transport.</p> <p>The options which promote a dispersed pattern of development (Options 1, 2, 4 and 5) will in part stimulate increases in greenhouse gas emissions by increasing the need to travel to services and amenities. Whilst this will be limited to an extent by new development supporting the provision of local services in these settlements, it is acknowledged that a greater degree of travel will be required to access a wider range of services and facilities. However, Option 5, which directs a dispersed spatial approach to housing to the settlements with good sustainable transport links, will help limit greenhouse gas emissions from transport through encouraging modal shift from the private car.</p> <p>In terms of the other aspects relating to greenhouse gas emissions, the sustainability performance of the option relating to climate change mitigation depends on elements such as the integration of energy efficient design within new development and the provision of renewable energy. It should be noted though that the higher quantum of development proposed through Option 1 (6,087 dwellings in comparison to the 3,429-2,578 dwellings put forward by the other four options) will do more to increase the built footprint of the SDNP, with associated overall increases in the National Park's greenhouse gas emissions.</p> <p>In terms of carbon sequestration, this depends on elements such as the integration of green infrastructure enhancements within new development areas and the on and off-site provision of carbon sinks.</p> <p>Overall, due to the relatively limited contribution of new development proposed through the options in the context of wider regional, national and global greenhouse gas emissions, and the associated likelihood of the influence of the growth strategy promoted through the SDLP on emissions being minor, no significant effects are anticipated in relation to climate change mitigation.</p>									
Climate Change Mitigation Sustainability Theme: Summary of options' rank									
<i>Option 1</i>	5	<i>Option 2</i>	4	<i>Option 3</i>	1	<i>Option 4</i>	3	<i>Option 5</i>	2
<i>Options with likely significant positive effects</i>									
<i>Options with likely significant negative effects</i>									
<i>Options with no likely significant effects</i>									
<i>Rankings: from 1 (most favourably performing) to 5 (least favourably performing)</i>									1-5

Table B12: Appraisal findings, Local Economy Sustainability Theme

Reasonable alternatives

Option 1: Dispersed High

Option 2: Dispersed Medium +60%

Option 3: Concentrated Medium

Option 4: Dispersed Medium

Option 5: Dispersed Medium- Sustainable Transport

The rural economy of the National Park is closely linked to agriculture, tourism and forestry

The provision of affordable housing is a key element for the rural economy. The availability of affordable rural housing in the National Park is a barrier to the rural economy through its impact on the labour market. It is a particular barrier for low pay sectors in the National Park including agriculture, forestry and tourism. In this context, Option 3, through limiting housing provision in the villages outside of the three main settlements of the National Park (Lewes, Petesfield, Midhurst, Petworth and Liss) will do less to support the provision of affordable housing which meets local needs in the National Park. This will have impacts on labour availability, with adverse effects for local businesses in these sectors. In terms of the other four options, Options 1 and 2, through promoting a higher quantum of housing, will do most to support labour availability in the National Park.

There is significant demand from farmers to diversify their businesses, such as through providing visitor accommodation, accommodating small businesses or meeting the growing market for locally produced food and drink. In this context the options which support a broader spread of housing in the National Park (Options 1, 2, 4 and 5) will help support the diversification of businesses through supporting local labour availability and promoting new business opportunities.

New housing provision in the SDNP will support the National Park's towns and villages' economic vitality through promoting the viability of local services and facilities, enhancing local economic offer, increasing the local market for goods and services and supporting cultural activities. In this context, Options 1, 2, 4 and 5 will support the economic viability and vitality of smaller settlements in the National Park, with benefits for the rural economy. This likely to lead to positive effects for the rural economy. For similar reasons, Option 3 will limit economic opportunities resulting from population increases in the smaller villages of the National Park, reducing the economic vitality of rural settlements. In the context of the vitality of the rural economy over the longer term, this has the potential to lead to **significant negative effects**, even with increased benefits through Option 3 to the economy of the three primary market towns in the National Park, Lewes, Petersfield and Midhurst.

The vitality of the visitor economy in the SDNP is closely linked to the National Park's landscape, setting, cultural heritage and local distinctiveness. Option 1, which proposes 6,087 dwellings in comparison to the 3,429-2,578 dwellings proposed by the other four options, has the most potential to undermine the special qualities of the National Park through increased levels of housing development. However, it should also be noted though that many of the smaller settlements in the SDNP are important centres for the tourism economy. For example, 13% of visitor nights to the National Park in 2003/4 were in Alfriston. Therefore a key element relating to the visitor economy will be to achieve an effective balance between supporting the vitality and viability of a settlement and protecting and enhancing the natural and built environment. In light of this consideration, Option 5, which promotes a dispersed approach to development whilst also focussing on the settlements with good accessibility by sustainable transport modes, will support a robust and sustainable visitor and tourism economy. This is likely to lead to positive effects in relation to this theme. However, the increased focus on allocating to settlements in close proximity to some measure of sustainable transport is not, in all cases, supporting the existing rural service centres. Settlements such as Finchdean and Warningcamp are not well-served in terms of services and this tempers the overall positive effect on the rural economy in the short-medium term.

In terms of the availability of higher quality agricultural land, the extent to which land classified as the best and most versatile agricultural land is lost through new development areas depends on the specific location of new housing provision. In this context it is not possible to establish which of the options will lead to the loss of the largest area of higher quality land; however, due to larger scale of development proposed at these locations, it is likely that Options 1, 2 and 3 will increase pressures on the best and most versatile agricultural land (i.e. land classified as Grade 1-3a agricultural land) established to be present in the vicinities of Lewes, Petersfield, Midhurst and Liss.

Agenda Item 12 Report NPA14/17 Appendix 3

SA Report to accompany
Pre-Submission consultation: Appendices

Reasonable alternatives

Option 1: Dispersed High

Option 2: Dispersed Medium +60%

Option 3: Concentrated Medium

Option 4: Dispersed Medium

Option 5: Dispersed Medium- Sustainable Transport

Rural Economy Sustainability Theme: Summary of options' rank

Option 1	3	Option 2	4	Option 3	5	Option 4	1	Option 5	2
----------	---	----------	---	----------	---	----------	---	----------	---

Options with likely significant positive effects

Options with likely significant negative effects

Options with no likely significant effects

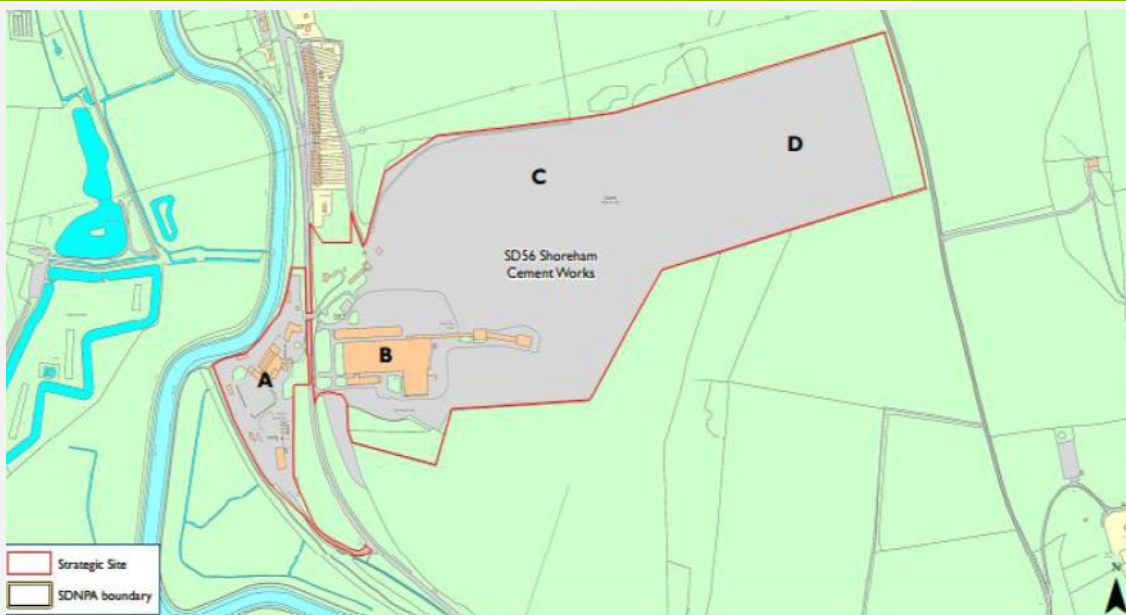
Rankings: from 1 (most favourably performing) to 5 (least favourably performing)

1-5

Appendix D: SHLAA methodology

Appendix E: Appraisal sheets, site allocation policies

Strategic Site Policy SD56: Shoreham Cement Works



Approximate size of site: 48 ha

Mixed use brownfield development and part minerals workings with restoration conditions attached

Sustainability Theme	Rating	Commentary
Landscape	+	<p>The Strategic Site, which is a disused cement works, currently has a significant effect on landscape quality in the area. This affects views from a wide area, including from much of the South Downs Way to the west. The Strategic Site's current effect on the wider landscape quality of the South Downs National Park is further accentuated by its prominent location at the narrowest part of the National Park.</p> <p>In this context there is considerable opportunity for the policy associated with the Strategic Site to lead to significant improvements in landscape quality in the area. This is recognised by the policy, which highlights that an AAP will be prepared for the site which will enhance the visual impact of the site from both nearby and distant public viewpoints and enhance and providing opportunities for understanding the historic significance and cultural heritage of the site.</p> <p>The policy also highlights that that the '<i>National Park Authority will resist more development than is necessary to secure and deliver the environmentally-led restoration of the site</i>' and seeks to ensure that '<i>the design of any development is of the highest quality and appropriate to its setting within a National Park.</i>'</p> <p>In this context the policy for the site will help both protect and support enhancements to landscape character in the area.</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 Adur) leads to potential effects from new development at this location on fluvial and surface water flooding. In this context the development of the AAP will help enable that flood risk issues on the site can be appropriately addressed.</p> <p>The policy supports on-site green infrastructure improvements. This will support climate change adaptation through helping to limit the effects of extreme weather events and regulating surface water run-off. Enhancements will also help increase the resilience of ecological networks to the effects of climate change through making provision for habitat management and enhancing biodiversity corridors.</p>
Biodiversity	+	<p>The Strategic Site is located adjacent to the Beeding Hill to Newtimber Hill SSSI, which is located to the north. The SSSI unit adjacent to the site has been evaluated to be in a 'favourable' condition. The former cement works is located within the SSSI's Impact Risk Zone for 'all planning applications-except householder applications'. As such, the development of the Strategic Site raises the possibility of adverse effects on the SSSI without avoidance and mitigation measures.</p> <p>The SSSI is situated on the scarp slope of the South Downs and is a site of both geological and biological importance. Three nationally uncommon habitats are represented: south-east chalk grassland, juniper scrub and calcareous pedunculate oak-ashbeech woodland. The site supports a rich community of invertebrates, especially harvestmen and has some uncommon butterflies and moths.⁵⁰</p> <p>Protected bird species are present at Area D of the site. A Regionally Important Geological Site is also located in Area D.</p> <p>The site comprises a range of BAP Priority Habitats, including good quality semi-improved grassland, deciduous woodland and lowland calcareous grassland.</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 acknowledges these various biodiversity and geodiversity constraints and opportunities through seeking to highlight that an '<i>exemplar sustainable mixed use development</i>' will be delivered at the site '<i>which delivers a substantially enhanced landscape and uses that are compatible with the purposes of the National Park</i>'. The policy's support for the preparation of an AAP for the site will also enable biodiversity issues to be appropriately addressed. The policy also specifically seeks to ensure that biodiversity is conserved and enhanced and opportunities for understanding the biodiversity value of the site are taken.</p>

⁵⁰ Beeding Hill to Newtimber Hill SSSI citation: http://www.sssi.naturalengland.org.uk/citation/citation_photo/1000374.pdf

Agenda Item 12 Report NPA14/17 Appendix 3

SA Report to accompany
Pre-Submission consultation: Appendices

Cultural Heritage	+	<p>Cross Dyke on Beeding Hill Scheduled Monument is located on the northern boundary of the Strategic Site. The site is also located approximately 800m from the shrunken medieval settlement at Old Erringham Scheduled Monument, which is located to the south of the site.</p> <p>As discussed under the Landscape Sustainability Theme, the Strategic Site currently has a significant effect on landscape quality in the area, with associated effects on the setting of the historic environment. In this context there is considerable opportunity for the policy associated with the Strategic Site to lead to significant improvements in landscape quality in the area. This is recognised by the policy, which highlights that the '<i>National Park Authority will resist more development than is necessary to secure and deliver the environmentally-led restoration of the site</i>' and seeks to ensure that '<i>the design of any development is of the highest quality and appropriate to its setting within a National Park.</i>' This will support enhancements to views to and from historic environment assets and support their setting.</p> <p>The policy also seeks to '<i>conserve and enhance opportunities for understanding the...geodiversity, historic significance and cultural heritage of the site.</i>' The policy therefore offers opportunities for recognising and conserving the intrinsic cultural heritage value of some of the buildings and structures of the disused cement works; however it should be noted that there is uncertainty as to their value.</p>
Cultural Activity	+	The policy for the Strategic Site seeks to promote tourism and the visitor economy through making provision for visitor accommodation and leisure/tourism use.
Health and Wellbeing	+	<p>Remediation of the site has the potential to lead to improved leisure and recreation opportunities, and enhancement of the existing leisure and recreational offer of the area (including the South Downs Way).</p> <p>The policy's focus on sustainable travel and additional provision for leisure/tourism use will support some opportunities for healthy lifestyles.</p>
Vitality of Communities		Due to the location of the site, the proposals for the Strategic Site are unlikely to lead to significant effects on the vitality of existing settlements, with the possible exception of localised benefits to Upper Beeding
Accessibility	?	The site is located at distance from services, facilities and amenities. This is recognised by the policy, which does not propose significant housing allocations and seeks to promote sustainable transport use.
Sustainable Transport	+	Whilst the site is located away from main public transport routes, the policy seeks to improve accessibility and support sustainable transport use.
Housing		The site is located at distance from local services, facilities and amenities. These are located 2-3km away at Upper Beeding and Steyning. This is recognised by the policy, which does not propose significant housing allocations.

Climate Change Mitigation	-	<p>Based on national and regional trends, in terms of greenhouse gas emissions, road transport is an increasingly significant contributor to emissions. 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 promotes the use of sustainable modes transport. In terms of non-transport emissions from the site, the policy new development to provide renewable energy provision</p> <p>It is, however, difficult to come to a conclusion as to the likely level of greenhouse gas emissions likely to originate from the site prior to detailed masterplanning.</p>
Local Economy	+	<p>The policy seeks to support a range of activities relating to the visitor and tourism economy. The significant improvements to landscape quality and the quality of the public realm in the area facilitated by the policy will support the visitor economy, including through improving views from the South Downs Way.</p> <p>The policy also seeks to facilitate provision for B2 and B8 business uses 'to support the local economy, with a focus on environmentally sustainable activities' and seeks to provide 'opportunities for entrepreneurship'. This will support emerging sectors of the economy.</p>

Summary of appraisal

Summary: Strategic Site Policy SD56: Shoreham Cement Works

Through a comprehensive redevelopment of a currently underused area which contributes to a poor quality public realm and significant effects on visual amenity, the proposed policy for the Shoreham Cement Works will bring a range of positive effects for landscape quality and the fabric and setting of the historic environment. The policy will also support biodiversity enhancements, which will help limit potential effects on the numerous designated and non-designated ecological assets present in the area.

The policy will support the visitor and tourism economy, and new sectors of the economy. The policy also recognises the existing constraints of the site in relation to accessibility by sustainable transport modes.

A commitment to prepare an AAP for the site (which will be accompanied by an SA process) will help ensure potential negative effects are avoided and mitigated and enable the numerous opportunities for the high quality and sustainable development the site to be realised.

Potential significant effects?

The policy has the potential to lead to significant positive effects on landscape quality, the setting of the historic environment, the rural economy (including the tourism and visitor economy) and cultural activity. With appropriate planning for green infrastructure networks, there is also the potential for significant biodiversity enhancements to take place. No significant negative effects are anticipated.

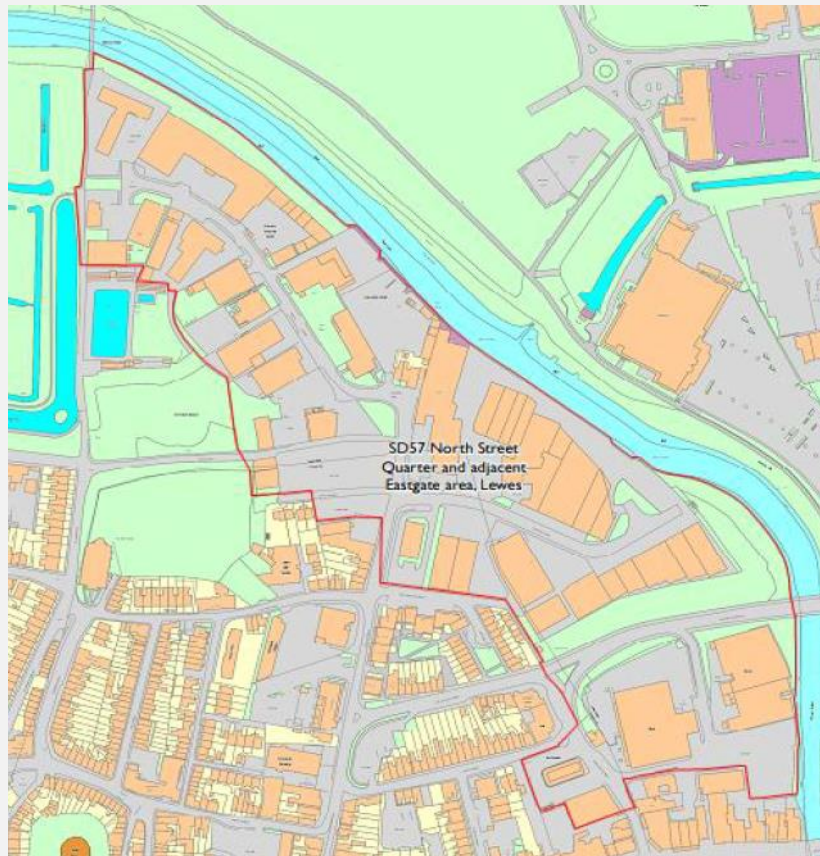
Recommendations

No recommendations.

Key

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

Strategic Site Policy SD57: North Street Quarter and adjacent Eastgate area, Lewes



Approximate size of site: 9 ha
Mixed use brownfield development

Sustainability Theme	Rating	Commentary
Landscape	+	The Strategic Site would comprise the redevelopment of existing uses. As such landscape quality would not be affected by the loss of existing landscape features and area of value. The policy also seeks to facilitate enhancements to the public realm, high standards of design and be consistent with the setting of the site within the South Downs National Park and adjacent to the conservation area. This will promote enhancements to townscape quality.
Climate Change Adaptation	+	The Strategic Site is within a Flood Zones 2 and 3 and has suffered from significant historic flooding, including in the year 2000. This is acknowledged by the policy which seeks to ensure that development ' <i>...incorporates the early provision of flood defences to an appropriate standard and to the approval of the Environment Agency</i> '. Through this approach, the policy approach for the Strategic Site will help reduce flood risk at this location.

Biodiversity	?	<p>Whilst no SSSIs are in close proximity to the Strategic Site, the site is located within an SSSI Impact Risk Zone for 'Residential development of 100 units or more'. This relates to the presence of the Offham Marshes SSSI, which is located approximately 850m to the north west of the site. As such, the development in the region of 415 dwellings raises the possibility of adverse effects on the SSSI without avoidance and mitigation measures. The unit of the SSSI closest to the Strategic Site has been deemed to be in 'favourable' condition.</p> <p>The north west of the site adjoins an area of coastal and floodplain grazing marsh 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>
Cultural Heritage	+	<p>The Strategic Site is located adjacent to two conservation areas: Lewes Conservation Area and Malling Deanery Conservation Area (which is located across the River Ouse).</p> <p>The south west of the site is located adjacent to a section of Lewes Town Wall which has been designated as a scheduled monument. One listed building is located within the site: the Grade II listed 6 Eastgate Street.</p> <p>The historic environment value of the area is acknowledged by the policy, which seeks to ensure that new redevelopment <i>'respects and enhances the character of the town and achieves a high standard of design, recognising the high quality built environment, on and within the vicinity of the site, and the site's setting within the South Downs National Park and adjacent to a Conservation Area'</i>.</p> <p>The archaeological potential of the area is also recognised by the policy which seeks to ensure that redevelopment is <i>'subject to an analysis and appropriate recognition of the site's cultural heritage and a programme of archaeological work, including, where applicable, desk-based assessment, geophysical survey, geo-archaeological survey and trial trenching to inform design and appropriate mitigation.'</i></p>
Cultural Activity	+	<p>The policy promotes mixed use development (including <i>'cultural, artistic and artisanal floorspace'</i>) with the potential to support a range of cultural activities. Improvements to the vitality of the area will also support cultural activity and tourism / visitor offer.</p>
Health and Wellbeing	+	<p>The policy's focus on sustainable travel, enhanced walking and cycling links and accessibility will support healthier lifestyles. The policy also seeks to improve health provision through incorporating new medical and health services within the redevelopment of the area.</p>
Vitality of Communities	+	<p>The redevelopment of the Strategic Site with the wide range of uses proposed through the policy will improve the vitality of the riverside area of Lewes and the town as a whole.</p>

Agenda Item 12 Report NPA14/17 Appendix 3

SA Report to accompany
Pre-Submission consultation: Appendices

Accessibility	+	The site is a highly accessible town location. The proposed mixed use redevelopment of the area will support access to services, facilities and amenities, both for those living in the area and from outside of the area. Improvements to pedestrian and cycle linkages, including a riverside shared foot/cycle route along the western bank of the River Ouse will support access to and from surrounding areas, and local walking and cycling networks.
Sustainable Transport	+	Due to its location, the proposed mixed use redevelopment of the area will support access to services, facilities and amenities by a range of transport modes. This will be supported by the policy's facilitation of improved pedestrian and cycle linkages, including a riverside shared foot/cycle route along the western bank of the River Ouse and its aim to ' <i>achieve a better balance between the car and other modes of transport</i> '. The policy also makes provision for the replacement of the existing bus station. The policy's facilitation of a high quality public realm and townscape will also promote walking and cycling.
Housing	+	The policy seeks to deliver in the region of 415 residential units at the Strategic Site, of which 40% will be affordable.
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 has a close focus on enhancements to pedestrian and cycle links. However, the aim to result in no net loss of public parking provision will continue to encourage an element of car use. In terms of non-transport emissions from the site, the policy requires an on-site renewable energy strategy ' <i>to ensure sustainable zero carbon development is delivered</i> '. It is however difficult to come to a conclusion as to the likely level of greenhouse gas emissions likely to emanate from the site prior to detailed masterplanning.
Rural Economy		Due to the Strategic Site's urban location is unlikely to have direct benefits for the rural economy. Indirect effects may be supported by improvements in visitor provision.
Summary of appraisal		

Summary: Strategic Site Policy SD57: North Street Quarter and adjacent Eastgate area, Lewes

The redevelopment of this part of Lewes will bring a range of benefits for the vitality of the area, and support economic diversification, cultural activities and affordable housing. The policy will also help facilitate enhancements to the quality of the public realm and promote the use of sustainable modes of transport.

A key element of these positive effects will be the policy approach's aim to address the existing significant flood risk issues present in the area.

Whilst the Strategic Site is located within an urban area, effects on biodiversity have the potential to arise, including linked to effects on designated biodiversity sites present locally. These effects are unlikely to be significant however.

Potential significant effects?

Through helping to address flood risk in the area, the policy will support significant positive effects for climate change adaptation in this part of Lewes.

The policy will also support significant positive effects on townscape quality, the vitality of the area, accessibility and the historic environment.

Recommendations

The policy should seek to more explicitly seek to minimise potential effects on nature conservation designations present locally, including the Offham Marshes SSSI.

Policy SD58: Former Allotments, Alfriston



Number of dwellings allocated: 5-10

Approximate size of site: c. 0.4ha

Sustainability Theme	Rating	Commentary
Landscape	?	<p>The site is abutted by housing on the south and west boundaries. The eastern boundary faces the River Cuckmere.</p> <p>The site is within the medieval core of Alfriston and is located adjacent to the riverside in a sensitive, high profile location. As highlighted by the landscape character assessment undertaken for the site, the existing agricultural buildings detract from the setting of the river and the public right of way along the riverside. The site is however assessed as Medium/high sensitivity owing to the location within the medieval core of the village.</p> <p>This is recognised through the policy, which seeks to ensure a 'suitably landscaped transition to the river valley' and protect the integrity of the conservation area.</p>
Climate Change Adaptation	?	<p>The eastern part of the site is located within an area at risk of fluvial flooding, with this part of the site being within a Flood Zone 2 and 3. This is recognised by the policy which seeks to ensure that residential development is sited in the western and central portion of the site, suitable flood mitigation measures are implemented and the use of SuDS is included in new development proposals. The policy also seeks to ensure new development minimises hard surfaced areas on site, and use permeable surfaces and soft landscaping where possible to maximise infiltration of water and reduce surface water run-off. Site access is also within the flood zone. This will need to be addressed.</p>

Agenda Item 12 Report NPA14/17 Appendix 3

SA Report to accompany
Pre-Submission consultation: Appendices

Biodiversity	?	<p>The site is not located within an SSSI Impact Risk Zone for the scale of residential development proposed.</p> <p>The site is located close to coastal and floodplain grazing marsh BAP Priority Habitat associated with the Cuckmere River. As such protected species have the potential to be present on the site. Some woodland is also present on the site with the potential to be of biodiversity value. The site is adjacent to the Seaford to Eastbourne Downs Biodiversity Opportunity Area.</p> <p>These elements are reflected by the policy for the site, which states that key trees of value should be retained and additional ones planted, biodiversity enhancements should be secured and provision should be made for protected species.</p>
Cultural Heritage	?	<p>The site is located in a sensitive location for historic environment interest. A number of listed buildings are located close to the site on North Street and the site is located within the Alfriston Conservation Area. This is recognised by the policy, which sets out that development proposals will need to "conserve and enhance the form and fabric of the Alfriston Conservation Area and preserve the setting of local heritage assets". The policy also states that a Heritage Statement should be prepared to accompany development proposals and an archaeological assessment is undertaken. This will help limit effects on this sensitive location.</p> <p>In relation to the historic setting of this part of the village, the policy seeks to "...provide a suitably landscaped transition to the river valley."</p>
Cultural Activity		No significant effects are anticipated.
Health and Wellbeing	?	The recently published Site Specific Highways Assessment highlights that safe vehicular access to the site may be an issue.
Vitality of Communities	+	The development of c.5-10 dwellings will help to support the vitality and vibrancy of Alfriston village and there will be some on site affordable housing provision.
Accessibility	+	The site is accessible to existing village facilities and amenities, including the primary school, shops, pubs and sports/recreational facilities. The village is also linked by (infrequent bus to Seaford, Lewes, Polegate and Eastbourne, with a wider range of services and facilities.
Sustainable Transport	?	Whilst the site is located close to existing bus links, these are relatively infrequent. The site is located 4km from Berwick railway station.
Housing	+	The delivery of approximately 5-10 dwellings on this site would help contribute towards meeting local demand for housing, which may include affordable housing
Climate Change Mitigation	-	The development of approximately 5-10 dwellings at this location will lead to minor increases in the built footprint of Alfriston- however, given the amount of housing proposed for this site it is not anticipated that associated effects on greenhouse gas emissions will be significant.
Local Economy	+	Through increasing local housing stock, the delivery of housing at this site has the potential to support the village's vitality. However, potential effects will be limited by the proposed size of the allocation.

Summary of appraisal

Summary: Policy SD58: Former Allotment site, Alfriston

The site is located in a sensitive location in relation to the historic environment and landscape character, and is located adjacent to BAP Priority Habitats. This is recognised by the policy, which seeks to secure protect and enhance the historic environment and landscape character and secure biodiversity enhancements.

Whilst part of the site is located within an area at risk of flooding, the policy precludes development in the higher risk areas of the site, and initiates mitigation measures.

The development of 5-10 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 surrounding larger settlements.

Potential significant effects?

Due to the size of the proposed allocation and the policy requirements, potential positive and negative effects are unlikely to be significant.

Recommendations

None proposed.

Key

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

Policy SD59: Kings Ride, Alfriston



Number of dwellings allocated: c.8

Approximate size of site: c. 0.38ha

Sustainability Theme	Rating	Commentary
Landscape	?	<p>The site is on the steeply sloped valley side which has been significantly levelled for the existing farm buildings. The valley rises above the site to the west and falls away to the east towards the River Cuckmere. There are several large agricultural barns on the site and associated hardstanding.</p> <p>The site has medium landscape sensitivity due to its prominent and highly visible location on the upper valley sides of the Cuckmere valley and being alongside the South Downs Way national trail. The topography and elevation of the site means that it is particularly visually sensitive from outwith the settlement. There is a group Tree Preservation Order on the eastern edge of the site.</p> <p>This is recognised by the policy, which seeks to ensure a suitable transition in built form and fabric from the low density residential development to the east and north and the open countryside to the south and west; ensure private amenity space and vehicular parking is suitably sited and landscaped; and boundary treatments are appropriate for a site adjacent to open countryside.</p>
Climate Change Adaptation		The site is not located within a flood risk area.
Biodiversity	+	<p>Whilst some of the existing agricultural buildings may be home to protected species, the site is not sensitive for biodiversity. The site is not located within an SSSI Impact Risk Zone for the scale of residential development proposed and the site is located over 50m north of deciduous woodland BAP Priority Habitat.</p> <p>However the policy seeks to enhance the biodiversity offer of the site through protecting and replacing trees on site and initiating new planting which is suitable for pollinating species.</p>

Agenda Item 12 Report NPA14/17 Appendix 3

SA Report to accompany
Pre-Submission consultation: Appendices

Cultural Heritage		The site is not sensitive for historic environment interest. No listed buildings or scheduled monuments are located in the vicinity of the site and it is not located within the Alfriston Conservation Area. No significant effects are anticipated therefore.
Cultural Activity		No significant effects are anticipated.
Health and Wellbeing		No significant effects are anticipated.
Vitality of Communities	+	The development of c.6-8 dwellings will help to support the vitality and vibrancy of Alfriston village and there will be some on site affordable housing provision.
Accessibility	+	The site is accessible to existing village facilities and amenities, including the primary school, shops, pubs and sports/recreational facilities. The village is also linked by (infrequent) bus to Seaford, Lewes, Polegate and Eastbourne, with a wider range of services and facilities.
Sustainable Transport	?	Whilst the site is located close to existing bus links, these are relatively infrequent. The site is located 4km from Berwick railway station.
Housing	+	The delivery of approximately 6-8 dwellings on this site would help contribute towards meeting local demand for housing.
Climate Change Mitigation	-	The development of approximately 6-8 dwellings at this location will lead to minor increases in the built footprint of Alfriston- however, given the amount of housing proposed for this site it is not anticipated that associated effects on greenhouse gas emissions will be significant.
Local Economy	+	Through increasing local housing stock, the delivery of housing at this site has the potential to support the village's vitality. However, potential effects will be limited by the proposed size of the allocation.

Summary of appraisal

Summary: Policy SD59: Kings Ride Farm, Alfriston

Whilst development at this location has the potential to have some uncertain effects on landscape character at this edge of village location, the proposed policy provides a robust approach to protecting and enhancing landscape character.

The development of 6-8 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 surrounding larger settlements by bus and the rail network.

Potential significant effects?

Due to the size of the proposed allocation, potential positive and negative effects are unlikely to be significant.

Recommendations

None proposed.

Key

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

Policy SD60: Land at Clements Close, Binsted



Number of dwellings allocated: c. 12 Approximate size of site: c.0.5 ha

Sustainability Theme	Rating	Commentary
Landscape		<p>The effect of the allocation on landscape quality will be limited by the belt of trees located on the south west and south east boundaries of the site. This will reduce effects on views from the south and east.</p> <p>The landscape assessment undertaken for the SHLAA has concluded that the site is not widely visible and relates to the existing settlement pattern and is therefore of low/medium sensitivity.</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>No designated sites or BAP Priority Habitat are located in the vicinity of the site. However, the site is within an SSSI Impact Risk Zone for the types of development proposed; (the Impact Risk Zone is triggered by residential development of ten units or more). This relates to potential effects on the Upper Greensand Hangers SSSI, part of which has also been designated as the East Hampshire Hangers SAC. The site is also approximately 3km from the Wealden Heaths Phase II SPA. As such, allocation of c.12 units at this location raises the possibility of adverse effects on these sites without avoidance and mitigation measures. This is recognised by the policy, which seeks to ensure appropriate mitigation of the impact of the development on the Wealden Heath Special Protection Area, and ensure a project level HRA is undertaken.</p> <p>The site is within the East Hampshire Hangers Biodiversity Opportunity Area.</p> <p>Effects will in part be limited by the policy's requirement for an appropriate ecological survey; a requirement to take into account and contribute to the aims of the East Hampshire Hangers Biodiversity Opportunity Area and the retention of existing mature trees and hedgerows around the site.</p>
Cultural Heritage		<p>No features or areas of historic environment sensitivity are located in the vicinity of the site.</p>
Cultural Activity		<p>The allocation is unlikely to have significant positive or negative effects relating to this SA theme.</p>

Health and Wellbeing		No significant effects at this level of detail.
Vitality of Communities	+	The development of 12 dwellings will help to support the vitality and vibrancy of Binsted village and there will be some on site affordable housing provision.
Accessibility	?	The site is accessible to existing village facilities and amenities, including the school, pub and recreation ground. However, the site is not in close proximity to shops and other services.
Sustainable Transport	?	The site has good accessibility to the school by foot and cycle. The site, however, has poor access to other services and facilities by sustainable modes of transport.
Housing	+	The site will deliver 12 dwellings. This will contribute to meeting local rural housing needs.
Climate Change Mitigation	-	The development of 12 dwellings at this location will lead to increases in the built footprint of Binsted. Poor access to sustainable transport networks also has the potential to increase emissions from transport. However, given the amount of housing proposed for this site it is not anticipated that associated effects on greenhouse gas emissions will be significant.
Local Economy	+	Through increasing local housing stock, the delivery of housing at this site has the potential to support the village's vitality. However, potential effects will be limited by the proposed size of the allocation.

Summary of appraisal

Summary: Policy SD60: Land at Clements Close, Binsted

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 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.

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.

In terms of the other sustainability themes, due to the size of the allocation and proposed policy approaches, potential negative effects are unlikely to be significant. Similarly potential positive effects are unlikely to be significant.

Recommendations

None proposed.

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

Policy SD61: New Barn Stables, Binsted



Number of pitches allocated: One permanent pitch for Gypsies and Travellers

Approximate size of site: c.0.15 ha

Sustainability Theme	Rating	Commentary
Landscape		The existing site has a limited, localised effect on landscape character with views of any development from the south being seen within the context of the existing buildings on this and adjoining sites. The allocation only seeks to provide provision for one additional pitch. Alongside the policy seeks to ensure that existing mature trees and hedgerows bordering the site must be retained and reinforced. This will limit impacts of new provision on landscape character.
Climate Change Adaptation		The site is not located within an area at risk of fluvial, surface water or groundwater flooding.
Biodiversity	?	<p>No designated sites or BAP Priority Habitats are located in the vicinity of the site. The site is also not within an SSSI Impact Risk Zone for the types of development proposed.</p> <p>The site is also approximately 3km from the Wealden Heaths Phase II SPA. This is recognised by the policy, which seeks to ensure appropriate mitigation of the impact of the development on the Wealden Heath Special Protection Area.</p> <p>The site is within the East Hampshire Hangers Biodiversity Opportunity Area.</p> <p>Effects will in part be limited by the allocation of only one pitch at this location and the policy's provision that existing mature trees and hedgerows bordering the site will be retained.</p>
Cultural Heritage		No features or areas of historic environment sensitivity are located in the vicinity of the site.
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		Given the size of the allocation, no significant effects at this level of detail.

Agenda Item 12 Report NPA14/17 Appendix 3

SA Report to accompany
Pre-Submission consultation: Appendices

Accessibility	?	The site is accessible to existing village facilities and amenities, including the school, pub and recreation ground. However, the site is not in close proximity to shops and other services.
Sustainable Transport	-	The site has good accessibility to the school by foot and cycle. The site, however, has poor access to other services and facilities by sustainable modes of transport.
Housing	+	The site will deliver one pitch. This will provide a contribution to meeting local needs for Gypsies and Travellers provision.
Climate Change Mitigation	-	Given the number of pitches proposed for this site (one) it is not anticipated that associated effects on greenhouse gas emissions will be significant.
Rural Economy		Through facilitating an additional Gypsies and Travellers pitch, the delivery of new provision at this site through the policy has the potential to support the village's vitality. This will however be limited by the proposed size of the allocation.

Summary of appraisal

Summary: Policy SD61: New Barn Stable, Binsted

The site will deliver one pitch. This will provide a contribution to meeting local needs for Gypsies and Travellers provision.

Potential effects on landscape, biodiversity and the setting of the village will be restricted by the limited size of the allocation and the retention of the existing mature trees and hedgerows bordering the site.

Potential significant effects?

None identified.

Recommendations

None proposed.

Policy SD62: Land at Greenway Lane, Buriton



Number of dwellings allocated: c. 8-10

Approximate size of site: c.0.5 ha

Sustainability Theme	Rating	Commentary
Landscape	?	<p>The site has high landscape sensitivity. However the site is consistent with the settlement pattern and with lesser highway and transport impacts in close proximity to the scarp slope.</p> <p>These constraints and potential impacts on landscape character from development at this location are recognised by the policy, which seeks to ensure that: new development enables a suitable transition in built form and fabric from the residential development to the east and the open countryside to the west, taking account the guidance set out in the emerging Village Design Statement; existing mature trees and hedgerows are retained and enhanced; and boundary treatments appropriate for a site adjacent to open countryside are incorporated.</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>No designated biodiversity sites or BAP Priority Habitat are located in the vicinity of the site which is also not within an SSSI Impact Risk Zone for the types of development proposed.</p> <p>Whilst the site is located within 200m of a SINC and ancient woodland, effects are likely to be limited by their location on the far side of the railway line. However, given the presence of these key habitats, some protected species may be affected by new development at this location.</p> <p>The site is within the East Hampshire Hangers Biodiversity Opportunity Area.</p> <p>Effects on biodiversity will in part be limited by the policy's requirement for hedgerows and trees to be retained, and the introduction of a Arboricultural Impact Assessment, Arboricultural Method Statement and associated Tree Protection Plan.</p>

Agenda Item 12 Report NPA14/17 Appendix 3

SA Report to accompany
Pre-Submission consultation: Appendices

Cultural Heritage		<p>The allocation is unlikely to affect the setting of the Conservation Area, which covers other parts of the village.</p> <p>Potential impacts on villagescape character will be limited by the policy seeking to ensure that new development enables a suitable transition in built form and fabric from the residential development to the east and the open countryside to the west, taking account the guidance set out in the emerging Village Design Statement; existing mature trees and hedgerows are retained and enhanced; and boundary treatments appropriate for a site adjacent to open countryside are incorporated.</p>
Cultural Activity		The allocation is unlikely to have significant positive or negative effects relating to cultural activity.
Health and Wellbeing		No significant effects at this level of detail.
Vitality of Communities	+	The development of 8-10 dwellings will support the vitality and vibrancy of Buriton through supporting services, facilities and amenities. The effect of this will be limited by the proposed size of the allocation however.
Accessibility	+	The site is accessible to existing village facilities and amenities, including the school, pub and sports facilities. The site is also, due to its proximity to the town, accessible to the wide range of services, facilities and amenities located in Petersfield. This is further supported by the site's proximity to the bus links between Buriton and Petersfield.
Sustainable Transport	+	The site has good accessibility to the school due to its relatively close proximity. The site is also accessible to the services, facilities and amenities located in Petersfield, due to its proximity to the bus links between Buriton and the town.
Housing	+	The site will deliver 8-10 dwellings. This will contribute to meeting local housing needs.
Climate Change Mitigation	-	The development of 8-10 dwellings at this location will lead to increases in the built footprint of Buriton. However, given the amount of housing proposed for this site it is not anticipated that associated effects on greenhouse gas emissions will be significant.
Local 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 SD62: Land at Greenway Lane, Buriton

The allocation is unlikely to have significant effects on biodiversity, or the historic environment. Impacts on landscape character will also be limited by the relatively small allocation given the size of the site.

The site is accessible to existing village facilities and amenities, including the school, pub and sports facilities. The site is also, due to its proximity to the town, accessible to the wide range of services, facilities and amenities located in Petersfield. This is further supported by the site's proximity to the bus links between Buriton and Petersfield.

Potential significant effects?

Due to the relatively limited size of the allocation, and proposed policy approaches, potential negative effects are unlikely to be significant. Similarly potential positive effects are unlikely to be significant.

Recommendations

None recommended.

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

Policy SD63: Land South of the A272 at Hinton Marsh, Cheriton



Number of dwellings allocated: c.12-15

Approximate size of site: c. 0.86ha

Sustainability Theme	Rating	Commentary
Landscape	?	<p>The site lies within the remaining fieldscape between recent residential development and the Hinton Ampner historic parkland. This part of the South Downs is characterised by blocks of ancient woodland, a late medieval field pattern marked typically by hedgerows, often with oak standards and thick tree belts. Water meadows associated with the River Itchen are present locally and permanent pasture is a typical land use, associated with sheep grazing. The landscape is of medium-scale along the Itchen Valley. The eastern boundary of the site is also the Parish boundary, for most of its length it is currently equestrian fencing. The remaining boundaries around the site are variable; comprising fencing and hedgerows.</p> <p>The site has low medium sensitivity due to likely impacts on the parkland. Limited visual impact in wider landscape. Some previously developed land is present where existing properties stand.</p> <p>The policy seeks to ensure development provides a suitable transition in built form and fabric from the existing residential areas to the north and west and the open countryside to the south and east</p>
Climate Change Adaptation		The site is not located within an area at risk of fluvial, surface water or groundwater flooding.
Biodiversity	?	<p>The site is located approximately 130m from the River Itchen SAC. The SAC is covered by the River Itchen SSSI and is situated within an SSSI Impact Risk Zone for the types of development proposed (<i>'residential development of 10 unites or more'</i>). These constraints are acknowledged by the policy, which states that new development proposals will need to <i>'demonstrate that there would be no significant impact on the River Itchen SSSI & SAC through development of the site for residential use.'</i></p> <p>The site is located adjacent to areas of woodpasture and parkland BAP Priority Habitat as well as deciduous woodland BAP Priority Habitat. In this context the policy seeks to retain existing trees and woodland, retain suitable existing habitat for pollinating species and facilitate planting for pollinating species.</p>
Cultural Heritage		The site is not located within or in close proximity to a conservation area, and is not located in the setting of a listed building. Hinton Ampner Park is located close to the site. In this context the policy seeks to ensure that a suitable transition in built form and fabric is provided from the existing residential areas to the north and west and the open countryside to the south and east.

Agenda Item 12 Report NPA14/17 Appendix 3

SA Report to accompany
Pre-Submission consultation: Appendices

Cultural Activity		No significant effects are anticipated.
Health and Wellbeing		No significant effects are anticipated.
Vitality of Communities	+	The development of c.12-15 dwellings will help to support the vitality and vibrancy of Cheriton village and there will be some on-site affordable housing provision.
Accessibility	+	The site is accessible to existing village facilities and amenities, including the primary school, village store/post office, pubs, village hall and sports/recreational facilities. The site is c.5km from the wider range of services and facilities present in New Alresford. The site is located close to an existing bus link between Winchester, New Alresford and Petersfield.
Sustainable Transport	?	Whilst the site is located close to an existing bus link between Winchester, New Alresford and Petersfield, this is limited to a two hourly service. The site is located 13km from Winchester railway station.
Housing	+	The delivery of approximately 12-15 dwellings on this site would help contribute towards meeting local demand for housing.
Climate Change Mitigation	-	The development of approximately 12-15 dwellings at this location will lead to increases in the built footprint of Cheriton- however, given the amount of housing proposed for this site it is not anticipated that associated effects on greenhouse gas emissions will be significant.
Local Economy	+	Through increasing local housing stock, the delivery of housing at this site has the potential to support the village's vitality. However, potential effects will be limited by the proposed size of the allocation.

Summary of appraisal:

Summary: Policy SD62: Land South of A272, Hinton Marsh, Cheriton

Positive effects associated with the proposed allocations include the provision of new housing to meet local needs and benefits associated with the vitality of Cheriton.

Potential effects on the neighbouring parkland are recognised by the policy, as is the need to preclude impacts on the River Itchen SSSI & SAC.

The site is adjacent to a bus route to Winchester, New Alresford and Petersfield. However this is only a two hourly service.

Potential significant effects?

Due to the relatively limited size of the allocation, and proposed policy approaches, potential negative effects are unlikely to be significant. Similarly potential positive effects are unlikely to be significant.

Recommendations

None proposed.

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

Policy SD64: Land South of London Road, Coldwaltham



Number of dwellings allocated: c.35-40

Approximate size of site: c.3.8 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.</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		The site is not located within an area at risk of fluvial, surface water or groundwater flooding.
Biodiversity	?	<p>The site is located within 130m 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 230m 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 3.5km from Duncton to Bignor Escarpment SAC and 5.5km from The Mens SAC</p> <p>As such, allocation of c.35-40 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 context there is further scope for additional approaches to be included to ensure that potential effects are avoided in the first instance.</p>
Cultural Heritage		The site is not located in the setting of a listed building and is 200m from Watersfield conservation area.

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 35-40 dwellings will help to support the vitality and vibrancy of Coldwaltham village and there will be some on site affordable housing provision.
Accessibility	?	The site is accessible to existing village facilities and amenities, including the school and pub.
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 35-40 dwellings. This will contribute to meeting local housing needs.
Climate Change Mitigation	-	The development of 35-40 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.
Local Economy	+	Through increasing local housing stock, the delivery of housing at this site has the potential to support the village's vitality. However, given the size of the allocation, there will be a need to enhance village services.

Summary of appraisal

Summary: Policy SD64: Land South of London Road, 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.

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 effectively implemented.

Given the high landscape sensitivity of the northern part of the site, the allocation has the potential to have significant effects on landscape quality.

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.

The size of the allocation in conjunction with the services and facilities available in the village suggests that there is further scope for the policy to acknowledge the need for new development to provide contributions to enhance services and facilities in the village.

Key

Agenda Item 12 Report NPA14/17 Appendix 3

SA Report to accompany
Pre-Submission consultation: Appendices

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

Policy SD65: Land East of Warnford Road, Corhampton

The proposed allocation has not been assessed as the site has existing planning consents for 18 dwellings.

Policy SD66: Land at Park Lane, Droxford



Number of dwellings allocated: c.26-32

Approximate size of site: c. 1.04ha

Sustainability Theme	Rating	Commentary
Landscape	?	<p>The site is a large former (horticultural) nursery and there is a mixture of existing sheds, greenhouses and buildings on the eastern part of the site. There are a number of mature trees on site.</p> <p>The site has Medium Sensitivity due to its potential risk to views of the church and the conservation area from the west of the settlement on the well-loved circular PROW/permissive route and Wayfarers Walk long distance waymarked trail.</p> <p>This is recognised by the policy which seeks to ensure that a suitable transition in built form and fabric from the residential areas to the north east and the open countryside to the south and west is implemented and facilitates the conservation and enhancement of the historic environment.</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>Whilst the site is not highly sensitive for biodiversity value, some features of biodiversity interest are present, including mature hedgerows. This is recognised by the policy, which seeks to and <i>"enhance hedgerows and trees within the site where possible, and where they are lost, provide at least the equivalent in new planting on site"</i> and initial new planting suitable for pollinating species.</p> <p>However no significant effects are anticipated.</p>
Cultural Heritage	?	<p>The site is located in a site sensitive for the setting of the historic core of the village. In this context it is located adjacent to the Droxford Conservation Area. This is recognised by the policy which seeks to ensure design is of a high quality which sympathetically conserves and enhances the setting of local heritage assets. The setting of the village is also supported through the policy's aim to ensure a suitable transition in built form and fabric from the residential areas to the north east and the open countryside to the south and west.</p>

Agenda Item 12 Report NPA14/17 Appendix 3

SA Report to accompany
Pre-Submission consultation: Appendices

Cultural Activity		No significant effects are anticipated.
Health and Wellbeing		No significant effects are anticipated.
Vitality of Communities	+	The development of c.26-32 dwellings will help to support the vitality and vibrancy of Droxford village and there will be some on site affordable housing provision.
Accessibility	?	Access to the site is problematic due to the narrow width of the Park Lane and its combined use by the school. This is recognised by the policy which seeks to secure highway enhancements, including for pedestrians.
Sustainable Transport	?	Bus services from Droxford are poor, with a large reliance on community bus services, this is limited to a two hourly service. The site is located 11km from the nearest railway station at Botley.
Housing	+	The delivery of approximately c.26-32 dwellings on this site would help contribute towards meeting local demand for housing.
Climate Change Mitigation	-	The development of approximately c.26-32 dwellings at this location will lead to increases in the built footprint of Droxford- however, given the amount of housing proposed for this site it is not anticipated that associated effects on greenhouse gas emissions will be significant.
Local Economy	+	Through increasing local housing stock, the delivery of housing at this site has the potential to support the village's vitality. However, potential effects will be limited by the proposed size of the allocation.

Summary of appraisal

Summary: Policy SD65: Land at Park Lane, Droxford

Potential impacts on landscape character and the historic environment will be mitigated through the policy approaches proposed.

The development of c.26-32 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.

Potential significant effects?

Due to the relatively limited size of the allocation, and proposed policy approaches, potential negative effects are unlikely to be significant. Similarly potential positive effects are unlikely to be significant.

Recommendations

None proposed.

Key

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

Policy SD67: Cowdray Works Yard, Easebourne



Number of dwellings allocated: 16-20 and 1500m² commercial buildings including up to 280m² A1 and 280m² A3

Approximate size of site: c. 0.9ha

Sustainability Theme	Rating	Commentary
Landscape	?	<p>The site is a large agricultural compound/yard used for estate management and other purposes. It has an established rural character and sits within the context of the Cowdray Estate.</p> <p>In landscape terms, the site has medium-high sensitivity due to the historic nature of the surrounding townscape and the Cowdray Estate, creating a sense of place. Impacts on the registered parkscape have the potential to take place due to the potential for suburban development to impact on its character.</p> <p>These elements are recognised through the policy, which seeks to ensure the high quality design of new development which is sensitive to the local heritage resource, enhances the setting of local heritage assets, and seeks to ensure that due regard is made to the emerging Easebourne Conservation Area Character Appraisal and Management Plan.</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 not located close to designated sites for biodiversity. The site is not located within an SSSI Impact Risk Zone for the scale of residential development proposed and is not located in close proximity to a BAP Priority Habitat.</p> <p>The policy seeks to enhance the biodiversity offer of the site through <i>"maximising available space for new tree planting"</i> and initiating new planting which is suitable for pollinating species.</p>

Agenda Item 12 Report NPA14/17 Appendix 3

SA Report to accompany
Pre-Submission consultation: Appendices

Cultural Heritage	?	<p>The site is in a highly sensitive location for the historic environment. It is located adjacent to the Grade II* listed Cowdray House Registered Park and Garden, 7-8 listed buildings are located in close proximity to the site's perimeter and the site is located within the Easebourne Conservation Area. The site is also located in an area of high archaeological potential.</p> <p>These elements are recognised through the policy, which seeks to ensure the high quality design of new development which is sensitive to the local heritage resource, enhances the setting of local heritage assets, and seeks to ensure that due regard is made to the emerging Easebourne Conservation Area Character Appraisal and Management Plan. The policy also requires that development proposals are accompanied by an archaeological assessment and a heritage statement.</p>
Cultural Activity	+	<p>The site is located in good proximity to the cultural services offered by Midhurst. The provision of 560m² of A1 and A3 floorspace has the potential to promote activities which support the visitor economy.</p>
Health and Wellbeing		<p>The site is located within walking distance (approximately 1km) to the centre of Midhurst and is accessible by foot/cycle. The location of the site therefore has the potential to promote healthier modes of travel.</p>
Vitality of Communities	+	<p>The development of 20 dwellings and commercial facilities on site will help to support the vitality and vibrancy of Easebourne village and there will be some on site affordable housing provision. An allocation at this location will also support the vitality of Midhurst town centre.</p>
Accessibility	+	<p>The site, which is located approximately 1km to the centre of Midhurst, has good accessibility to the services and facilities in the town. The policy seeks to enable a publicly accessible pedestrian route from Easebourne Lane through to Cowdray Park to be delivered through the allocation.</p>
Sustainable Transport	+	<p>The site, which is located approximately 1km to the centre of Midhurst, has good accessibility to the services and facilities in the town by walking/cycling and public transport. This will support the use of sustainable modes of transport.</p>
Housing	+	<p>The site will deliver c.20 dwellings. This will contribute to meeting local housing needs.</p>
Climate Change Mitigation	-	<p>The site has good accessibility to the services and facilities in Midhurst. This will support climate change mitigation by reducing the need to travel in comparison to other site options. The development of 20 dwellings at this location will lead to increases in the built footprint of Easebourne; however, given the amount of housing proposed for this site it is not anticipated that associated effects on greenhouse gas emissions will be significant.</p>
Local Economy	+	<p>The provision of 1500m² of commercial floorspace including up to 560m² of A1 and A3 floorspace will support the economic vitality of both Easebourne and Midhurst. The allocation will also encourage uses which will support the visitor economy.</p>
Summary of appraisal		

Summary: Policy SD67: Cowdray Works Yard, Easebourne

Whilst development at this location has the potential to have negative effects on features and areas of historic environment and townscape 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, which is located approximately 1km to the centre of Midhurst, has good accessibility to the services and facilities in the town by walking/cycling and public transport. The provision of 1500m² of commercial floorspace including up to 560m² of A1 and A3 floorspace will support the economic vitality of both Easebourne and Midhurst.

Potential significant effects?

None identified.

Recommendations

None proposed.

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

Policy SD68: Land North of Egmont Road, Easebourne



Number of dwellings allocated: c.16-20 dwellings

Approximate size of site: c.0.7 ha

Sustainability Theme	Rating	Commentary
Landscape	?	<p>Allocation of 16-20 dwellings at this site has the potential to affect the sensitive townscape at this location. This is highlighted by the site's location adjacent to the Easebourne Conservation Area and close to (within 40m) the Grade II* listed Registered Park and Garden of Cowdray House. The site has been evaluated as having medium landscape sensitivity.</p> <p>This is recognised by the policy which seeks to ensure that careful consideration is given to the street frontage on Egmont Road and the boundary treatment to the site and a Heritage Statement and a Landscape and Visual Impact Assessment is undertaken to inform design and layout. The site is also well screened from the Registered Park and Garden.</p>
Climate Change Adaptation		The site is not located within an area at risk of fluvial, surface water or groundwater flooding.
Biodiversity		No designated sites or BAP Priority Habitat are located in the vicinity of the site and the site is not within an SSSI Impact Risk Zone for the types of development proposed. The policy also seeks to ensure that an appropriate ecological survey is undertaken and existing hedgerows are maintained and enhanced.
Cultural Heritage	?	<p>Located adjacent to the Easebourne Conservation Area and close to the nearby Grade II listed buildings Lychgate and Ivy Cottage, the allocation of 20 dwellings at this site has the potential to affect an area sensitive for its historic environment value.</p> <p>The site is also located close to (within 40m) but is well screened from, the Grade II* listed Registered Park and Garden of Cowdray House.</p> <p>Potential effects on the setting of these features and areas of historic environment sensitivity are recognised by the policy which seeks to ensure that careful consideration is given to the street frontage on Egmont Road and the boundary treatment to the site. It ensures that a Heritage Statement and a Landscape and Visual Impact Assessment is undertaken to inform design and layout.</p>

Agenda Item 12 Report NPA14/17 Appendix 3

SA Report to accompany
Pre-Submission consultation: Appendices

Cultural Activity		The site is located in good proximity to the cultural services offered by Midhurst. The allocation is unlikely to have significant positive or negative effects relating to sustainable tourism.
Health and Wellbeing	+	The site is located approximately 1km to the centre of Midhurst and is accessible by foot/cycle. The location of the site therefore has the potential to promote healthier modes of travel.
Vitality of Communities	+	The development of 16-20 dwellings will help to support the vitality and vibrancy of Easebourne village and there will be some on site affordable housing provision.
Accessibility	+	The site, which is located approximately 1km to the centre of Midhurst, has good accessibility to the services and facilities in the town.
Sustainable Transport	+	The site, which is located approximately 1km to the centre of Midhurst, has good accessibility to the services and facilities in the town by walking/cycling and public transport. This will support the use of sustainable modes of transport.
Housing	+	The site will deliver 16-20 dwellings. This will contribute to meeting local housing needs.
Climate Change Mitigation	-	The site has good accessibility to the services and facilities in Midhurst. This will support climate change mitigation by reducing the need to travel in comparison to other site options. The development of 16-20 dwellings at this location will lead to increases in the built footprint of Easebourne; however, given the amount of housing proposed for this site it is not anticipated that associated effects on greenhouse gas emissions will be significant.
Local Economy	+	Through increasing local housing stock, the delivery of housing at this site has the potential to support the village's vitality. However, potential effects will be limited by the proposed size of the allocation.

Summary of appraisal

Summary: Policy SD68 Land North of Egmont Road, Easebourne

Whilst development at this location has the potential to have negative effects on features and areas of historic environment and townscape 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, which is located approximately 1km to the centre of Midhurst, has good accessibility to the services and facilities in the town by walking/cycling and public transport.

Potential significant effects?

None identified.

Recommendations

None proposed.

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

Policy SD69: Former Easebourne School, Easebourne



Number of dwellings allocated: 16-20

Approximate size of site: c. 2.1ha

Sustainability Theme	Rating	Commentary
Landscape	?	<p>The site is bounded by a hedgerow to the west. The eastern boundary adjoins the rear boundaries of adjacent dwellings. The southern boundary is not well defined as it adjoins the school complex of which the site is a part. The site is sloping towards the east & Easebourne Street.</p> <p>The site has medium landscape sensitivity due to the existing use of the site, the relationship with the landform and surrounding properties.</p> <p>This is recognised by the policy, which seeks to ensure that new development is accompanied by a heritage statement and a Landscape Visual Impact Assessment. It also seeks to retain the central portion of the site as an open visual gap and conserve and enhance the setting of listed buildings and the conservation area.</p>
Climate Change Adaptation		<p>The site is not located within an area at risk of fluvial, surface water or groundwater flooding. However the policy seeks to ensure suitable flood risk mitigation is included within development at the site, including relating to surface water runoff.</p>
Biodiversity	+	<p>The site is not sensitive for biodiversity. It is not located within an SSSI Impact Risk Zone for residential development and is not located in close proximity to a BAP Priority Habitat.</p> <p>The policy seeks to enhance the biodiversity offer of the site through protecting trees and initiating new planting which is suitable for pollinating species.</p>
Cultural Heritage	?	<p>Two listed buildings are located on the site: the Grade II listed Schoolmaster's House and the Grade II listed Easebourne Parochial First School. The site is also within the Easebourne Conservation Area.</p> <p>This is recognised through the policy, which seeks to conserve and enhance these features and areas and settings and promote layout which complements the settings of key features.</p>
Cultural Activity		<p>The site is located in good proximity to the cultural services offered by Midhurst. The allocation is unlikely to have significant positive or negative effects relating to sustainable tourism.</p>

Agenda Item 12 Report NPA14/17 Appendix 3

SA Report to accompany
Pre-Submission consultation: Appendices

Health and Wellbeing		The site is located approximately 1.1km to the centre of Midhurst and is accessible by foot/cycle. The location of the site therefore has the potential to promote healthier modes of travel.
Vitality of Communities	+	The development of 16-20 dwellings will help to support the vitality and vibrancy of Easebourne village and there will be some on site affordable housing provision.
Accessibility	+	The site, which is located approximately 1.1km to the centre of Midhurst, has good accessibility to the services and facilities in the town.
Sustainable Transport	+	The site, which is located approximately 1.1km to the centre of Midhurst, has good accessibility to the services and facilities in the town by walking/cycling and public transport. This will support the use of sustainable modes of transport.
Housing	+	The site will deliver 16-20 dwellings. This will contribute to meeting local housing needs.
Climate Change Mitigation	-	The site has good accessibility to the services and facilities in Midhurst. This will support climate change mitigation by reducing the need to travel in comparison to other site options. The development of 16-20 dwellings at this location will lead to increases in the built footprint of Easebourne; however, given the amount of housing proposed for this site it is not anticipated that associated effects on greenhouse gas emissions will be significant.
Local Economy	+	Through increasing local housing stock, the delivery of housing at this site has the potential to support the village's vitality. However, potential effects will be limited by the proposed size of the allocation.

Summary of appraisal

Summary: Policy SD69: Former School, Easebourne

Whilst development at this location has the potential to have negative effects on features and areas of historic environment and townscape 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 policy will also support biodiversity enhancements at this location.

The site, which is located approximately 1km to the centre of Midhurst, has good accessibility to the services and facilities in the town by walking/cycling and public transport.

Potential significant effects?

Due to the relatively limited size of the allocation, and proposed policy approaches, potential negative effects are unlikely to be significant. Similarly potential positive effects are unlikely to be significant.

Recommendations

None proposed.

Key

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

Policy SD70: Land Behind the Fridays, East Dean (East Sussex)

The proposed allocation has not been assessed as the site has existing planning consents for 11 dwellings.

Policy SD71: Land at Elm Rise, Findon



Number of dwellings allocated: 15-20

Approximate size of site: 0.7 ha

Sustainability Theme	Rating	Commentary
Landscape	?	<p>The site is a field laid to pasture with some subdivision. There are mature hedged boundaries to the north west and east, domestic rear gardens to the south. Located on the eastern Findon valley side and is the most southerly extent of the open undeveloped valley side.</p> <p>The site has medium landscape sensitivity in the western section, and medium-high sensitivity to east as the site becomes more elevated and views from the bridleway would be affected. This is recognised by the policy, which seeks to ensure development is focused on the western and southern parts of the site, and provides a suitably landscaped transition to more elevated areas.</p>
Climate Change Adaptation		The site is not located within an area at risk of fluvial, surface water or groundwater flooding.
Biodiversity	+	<p>The site is not located in close proximity to designate biodiversity sites. It is not located within an SSSI Impact Risk Zone for residential development and is not located in close proximity to a BAP Priority Habitat. The site has some features which are of value for biodiversity however, including a mature hedgerow, and there is potential for protected species to be present. It is also located within the South Downs Way Nature Improvement Area</p> <p>This is recognised by the policy, which seeks to enhance the biodiversity offer of the site, protect trees and initiating new planting which is suitable for pollinating species.</p>
Cultural Heritage		The site is not sensitive for historic environment interest. No listed buildings or scheduled monuments are located in the vicinity of the site. No significant effects are anticipated therefore.
Cultural Activity		No significant effects are anticipated.
Health and Wellbeing		No significant effects are anticipated.
Vitality of Communities	+	The development of 15-20 dwellings at this location will help to support the vitality and vibrancy of Findon village and there will be some on site affordable housing provision.

Accessibility	+	The site is accessible to existing village facilities and amenities, including the school, post office, shops, pubs and sports/recreational facilities. The site is also, due to its relative proximity to Worthing, accessible to the range of services, facilities and amenities located in the nearby south coast conurbation. Bus links are also good, with frequent services, to Worthing, Pulborough and Midhurst.
Sustainable Transport	+	The site is located close to an existing bus links, including frequent services, to Worthing, Pulborough and Midhurst.
Housing	+	The delivery of approximately 15-20 dwellings on this site would help contribute towards meeting local demand for housing.
Climate Change Mitigation	-	The development of approximately 15-20 dwellings at this location will lead to increases in the built footprint of Findon- however, given the amount of housing proposed for this site it is not anticipated that associated effects on greenhouse gas emissions will be significant.
Local Economy	+	Through increasing local housing stock, the delivery of housing at this site has the potential to support the village's vitality. However, potential effects will be limited by the proposed size of the allocation.

Summary of appraisal

Summary: Policy SD71: Land at Elm Rise, Findon

The site is not sensitive in terms of biodiversity or historic environment interest. Whilst parts of the site have medium high landscape sensitivity, impacts on landscape character will be reduced by focusing development on the south and western parts of the site, which have lower sensitivity.

The site has good access to services and facilities, as well as public transport networks.

Potential significant effects?

Due to the relatively limited size of the allocation, and proposed policy approaches, potential negative effects are unlikely to be significant. Similarly potential positive effects are unlikely to be significant.

Recommendations

None proposed.

Key

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

Policy SD72: Soldiers Field House, Findon



Number of dwellings allocated: c.10-12

Approximate size of site: c. 0.6ha

Sustainability Theme	Rating	Commentary
Landscape	?	<p>The site is a residential plot, with stables adjoining to the north.</p> <p>The site has medium sensitivity. Views from the east are sensitive from the wider downland and there are potential impacts on the adjacent PRoW. Development at this site has the potential for impacts on the setting of Nepcote Green.</p> <p>This is recognised by the policy, which seeks to ensure that new development is accompanied by a Landscape Visual Impact Assessment. It also seeks to 'positively enhance the contribution of the site to the downland landscape and the setting of the Wattle House, particularly as viewed from public rights of way to the east and south and from Nepcote Green'.</p>
Climate Change Adaptation	?	<p>Parts of the site are susceptible to surface water flooding. This is recognised by the policy which seeks to minimise hard surfaced areas on site, and use permeable surfaces and soft landscaping where possible to maximise infiltration of water and reduce surface water run-off.</p>
Biodiversity	+	<p>The site is not located close to designated biodiversity sites. It is not located within an SSSI Impact Risk Zone for residential development and is not located in close proximity to BAP Priority Habitat. The site has some features which are of value for biodiversity however, including a mature hedgerow, and there is potential for protected species to be present. It is also located within the South Downs Way Nature Improvement Area</p> <p>This is recognised by the policy, which seeks to enhance the biodiversity offer of the site, retain the key hedgerow on the site, protect trees and initiate new planting which is suitable for pollinating species.</p>

Agenda Item 12 Report NPA14/17 Appendix 3

SA Report to accompany
Pre-Submission consultation: Appendices

Cultural Heritage		The Wattle House, which is Grade II listed, is located 170m to the south of the site,. The site is also not located in proximity to a conservation area. This is recognised by the policy, which seeks to ensure than new development is accompanied by a Landscape Visual Impact Assessment. It also seeks to 'positively enhance the contribution of the site to the downland landscape and the setting of the Wattle House, particularly as viewed from public rights of way to the east and south and from Nephote Green'.
Cultural Activity		No significant effects are anticipated.
Health and Wellbeing		No significant effects are anticipated.
Vitality of Communities	+	The development of c.10-12 dwellings at this location will help to support the vitality and vibrancy of Findon village and there will be some on site affordable housing provision.
Accessibility	+	The site is accessible to existing village facilities and amenities, including the school, post office, shops, pubs and sports/recreational facilities. The site is also, due to its relative proximity to Worthing, accessible to the range of services, facilities and amenities located in the nearby south coast conurbation and the railway station. Bus links are also good, with frequent services, to Worthing. However the site is currently only accessible up a narrow lane (Soldiers Field Lane).
Sustainable Transport	+	The site is located close to an existing bus link with frequent services to Worthing.
Housing	+	The delivery of approximately 10-12 dwellings on this site would help contribute towards meeting local demand for housing.
Climate Change Mitigation	-	The development of approximately 10-12 dwellings at this location will lead to increases in the built footprint of Findon- however, given the amount of housing proposed for this site it is not anticipated that associated effects on greenhouse gas emissions will be significant.
Local Economy	+	Through increasing local housing stock, the delivery of housing at this site has the potential to support the village's vitality. However, potential effects will be limited by the proposed size of the allocation.

Summary of appraisal

Summary: Policy SD72: Soldiers Field House, Findon

The site is not sensitive in terms of biodiversity or historic environment interest. Whilst parts of the site have medium landscape sensitivity, impacts on landscape character will be reduced by the proposed policy approaches.

The site has good access to services and facilities, as well as public transport networks.

Potential significant effects?

Due to the relatively limited size of the allocation, and proposed policy approaches, potential negative effects are unlikely to be significant. Similarly potential positive effects are unlikely to be significant.

Recommendations

None proposed.

Agenda Item 12 Report NPA14/17 Appendix 3

SA Report to accompany
Pre-Submission consultation: Appendices

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

Policy SD73: Land at Petersfield Road, Greatham



Number of dwellings allocated: c.35-40 Approximate size of site: c.2.4 ha

Sustainability Theme	Rating	Commentary
Landscape	?	<p>Whilst the site is located on a former horticultural nursery 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		The site is not located within an area at risk of fluvial, surface water or groundwater flooding.
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, adjacent to 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 requires that a Heritage Statement is prepared and a pre-application archaeological assessment is undertaken.
Cultural Activity		No significant effects are anticipated.

Agenda Item 12 Report NPA14/17 Appendix 3

SA Report to accompany
Pre-Submission consultation: Appendices

Health and Wellbeing		No significant effects are anticipated.
Vitality of Communities	+	The development of c.35-40 dwellings will help to support the vitality and vibrancy of Greatham village and there will be some on site affordable housing provision.
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 35-40 dwellings on this site would help contribute towards meeting local demand for housing.
Climate Change Mitigation	-	The development of approximately 35-40 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.
Local 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 SD73: 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 in 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 40 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.

Key

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

Policy SD74: Fern Farm, Longmoor Road, Greatham



Number of allocations: Four permanent pitches for Gypsies and Travellers

Sustainability Theme	Rating	Commentary
Landscape	?	<p>The proposed allocation of four pitches is at an existing Gypsies and Travellers site. The existing Gypsy and Traveller site has no visual impacts beyond the immediate boundaries. The site is closely related to the existing village and its relative containment limits its impact on the wider area.</p> <p>However the policy seeks to provide an attractive street frontage to Longmoor Road, reflecting the transition from village to woodland in this location, and 'contain significant planting in order to reduce the urbanising impact of the development and provide a transition to the woodland and ponds beyond'.</p> <p>As such no significant effects on landscape character are likely to arise from the allocation.</p>
Climate Change Adaptation		The policy for the allocation states that a Flood Risk Assessment should be undertaken and surface water drainage 'should be controlled'.
Biodiversity	?	<p>The site is located within 400m of 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>). However the provision of two additional pitches is unlikely to bring negative effects in relation to the status of the sites.</p> <p>The site is adjacent to areas of deciduous woodland BAP Priority Habitat.</p>
Cultural Heritage		No features or areas of historic environment sensitivity are located in the vicinity of the site.
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		Given the size of the allocation, no significant effects at this level of detail.

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 site will deliver four permanent pitches. This will contribute to meeting local needs for Gypsies and Travellers provision.
Climate Change Mitigation	-	The development of four pitches at this location will lead to increases in the built footprint of Greatham. However, given the number of pitches proposed, it is not anticipated that associated effects on greenhouse gas emissions will be significant.
Rural Economy		Through facilitating four additional Gypsies and Travellers pitches, the delivery of new provision at this site through the policy has the potential to support the village's vitality. This will however be limited by the proposed size of the allocation.

Summary of appraisal

Summary: Policy SD74: Fern Farm, Longmoor 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. However the provision of two additional sites is unlikely to bring negative effects in relation to the status of the pitches.

The development of two additional pitches at the site, and the making permanent of the existing two pitches, will help meet local needs for Gypsies and Travellers provision for and support the vitality of the local area. The site is also accessible to village amenities, and relatively accessible to Liss by bus.

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.

Policy SD75: Half Acre, Hawkley Road, Hawkley



Number of dwellings allocated: Three permanent pitches for Gypsies and Travellers

Approximate size of site: c.0.25 ha

Sustainability Theme	Rating	Commentary
Landscape	?	<p>The proposed allocation of three pitches is at an existing Gypsies and Travellers site with temporary planning permission. The site has a limited, localised effect on landscape character with views being well contained and it is not subject to overlooking.</p> <p>As such no significant effects on landscape character are likely to arise from the allocation.</p>
Climate Change Adaptation		<p>Part of the site is subject to surface water runoff. The policy for the allocation states that surface water drainage 'should be controlled' and hard surfaced areas should be minimised on site, and the use of permeable surfaces and soft landscaping should take place where possible to 'maximise infiltration of water and reduce surface water run-off'.</p>
Biodiversity	+	<p>The site is within 10m of the East Hampshire Hangars Biodiversity Opportunity Area. It is not within an SSSI Impact Risk Zone for the type of development proposed or located adjacent to BAP Priority Habitat.</p> <p>The policy seeks to protect and enhance existing hedgerows and trees and initiate new planting for pollinating species.</p>
Cultural Heritage		<p>No features or areas of historic environment sensitivity are located in the vicinity of the site.</p>
Cultural Activity		<p>The allocation is unlikely to have significant positive or negative effects relating to sustainable tourism.</p>
Health and Wellbeing		<p>No significant effects at this level of detail.</p>
Vitality of Communities		<p>Given the size of the allocation, no significant effects at this level of detail.</p>
Accessibility	-	<p>The site is, 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 are limited to a two hourly service during the day.</p>
Sustainable Transport	?	<p>Whilst the site is located close to an existing bus link, this is limited to a two hourly service. The site is located 2.9km from Liss railway station.</p>

Agenda Item 12 Report NPA14/17 Appendix 3

SA Report to accompany
Pre-Submission consultation: Appendices

Housing	+	The site will deliver three permanent pitches. This will contribute to meeting local needs for Gypsies and Travellers provision.
Climate Change Mitigation	-	Given the number of pitches proposed for this site (three) it is not anticipated that associated effects on greenhouse gas emissions will be significant.
Rural Economy		Given the size of the allocation, no significant effects.

Summary of appraisal

Summary: Policy SD75: Half Acre, Hawkley Road, Hawkley

The development of three permanent pitches at the site will help meet local needs for Gypsies and Travellers provision for and support the vitality of the local area. The site is also relatively accessible to the services and facilities of Liss.

The site is not located in a location sensitive for landscape character, biodiversity or the historic environment.

Potential significant effects?

None identified.

Recommendations

None proposed.

Policy SD76: Land at Itchen Abbas House



Number of dwellings allocated: c.8-10

Approximate size of site: c.0.66 ha

Sustainability Theme	Rating	Commentary
Landscape	?	<p>The site is set within the 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.</p> <p>In terms of landscape quality, the site has been evaluated as having low/medium landscape sensitivity and landscape impact could be minimised provided development is well designed and in character with the surrounding built form. As such the allocation of this site is unlikely to have a marked effect on landscape quality in the area.</p>
Climate Change Adaptation		<p>The site is not within an area considered at risk of flooding but is located at relatively close proximity to the River Itchen. There are currently no climate adaptation benefits anticipated, although these could be built into the development should this site be brought forward. The provision of green infrastructure on this site (e.g. street trees, rain gardens) could be linked with efforts to improve the Itchen Valley Biodiversity Opportunity Area (for example, though the selection of species that enhance the areas ecological network).</p>

Agenda Item 12 Report NPA14/17 Appendix 3

SA Report to accompany
Pre-Submission consultation: Appendices

Biodiversity	?	<p>The proposed site is in close proximity to the River Itchen Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC), and is classified as being within an SSSI Impact Risk Zone for 'all planning applications- except householder applications'. The SSSI units directly south of the site are in 'favourable' and 'unfavourable recovering' condition respectively. As such, further advice will be required from Natural England to determine whether any potential impacts will require mitigation actions or the non-allocation of this site. The policy recognises the presence of the international and national biodiversity designation through seeking to ensure that new development demonstrates 'that there would be no significant impact on the River Itchen Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC)'</p> <p>The site is a brownfield site and such locations can be home to unique and important assemblies of species. As such the policy's aim to ensure that an '<i>appropriate ecological survey</i>' is carried out will help ensure that this potential risk is taken into account.</p> <p>The Itchen Valley Biodiversity Opportunity Area is adjacent to the site (across a road). The proposed policy approach for the allocation will be required to take into account and contribute to the aims of the area. As such, the site has potential to contribute positively to the area's biodiversity dependent on the extent of the actions undertaken.</p>
Cultural Heritage		No features or areas of historic environment sensitivity are located in the vicinity of the site.
Cultural Activity		No significant effects are anticipated.
Health and Wellbeing	?	There is a Historic Landfill Site within 250 metres of the proposed development site. This is acknowledged by the policy, which seeks to ensure further investigations of potential contamination are carried out.
Vitality of Communities	+	The development of ten dwellings will help to support the vitality and vibrancy of Itchen Abbas village and there will be some on site affordable housing provision.
Accessibility	+	<p>Residents on any new development at the site will have good access to the village's facilities, although it is likely that they will have to travel further afield to Winchester for a wider array of services. The scale of development is unlikely to have any significant effect on the capacity of facilities to service existing residents.</p> <p>The village is relatively well connected to Winchester by bus during the day, however no direct buses are available after approximately 17:20.</p>
Sustainable Transport	+	<p>The village is relatively well connected by bus to Winchester, with an hourly service during the day taking approximately 15 minutes.</p> <p>There is the potential for development gains from this site to contribute to the completion of the off-road walking and cycling route along the Itchen Valley between Kings Worthy and Alresford, which is a project identified in the South Down's Infrastructure Delivery Plan.</p>
Housing	+	The site will deliver approximately ten new dwellings which should contribute positively to the meeting of local need for housing.

Climate Change Mitigation	-	The distance of Itchen Abbas to Winchester and the relative difficulty of travelling between the two settlements by bus outside of core hours in the day may result in an increase in private car use, with resulting negative effects in terms of CO ₂ emissions. However, given the amount of housing proposed for this site it is not anticipated that these effects will be significant.
Local 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 SD76: Land at Itchen Abbas House

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. The policy for the allocation seeks to ensure that impacts on the SSSI and SAC present locally are addressed and that it contributes to the aims of the Itchen Valley Biodiversity Opportunity Area.

The village is relatively well connected by bus to Winchester.

Potential significant effects?

None identified at this level of detail.

Recommendations

None proposed.

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

Approximate size of site: c.0.72 ha

Landscape	?	<p>The site lies within the remaining fieldscape created post 1920, contemporary with the original orchard planting. This part of the South Downs is characterised by chalk grassland and woodland on the steeper slopes. Minor lanes and tracks descend the valley sides and are typically historic. The landscape is of medium scale and the site boundary comprises trees and hedgerows on all but the side adjacent to existing settlement which remains open.</p> <p>In terms of landscape quality, the site has been evaluated as having medium sensitivity due to likely visual impact in wider landscape. The site includes some previously developed land where existing properties/greenhouses stand. This is recognised by the policy, which seeks to ensure that new development is accompanied by a Landscape Visual Impact Assessment, publicly accessible public open space is provided and a suitably landscaped transition at the site boundaries is implemented.</p>
Climate Change Adaptation		The site is not located within an area at risk of fluvial, surface water or groundwater flooding.
Biodiversity	?	<p>The proposed allocation is classified as being within an Impact Risk Zone for the Kingston Escarpment and Iford Hill SSSI for 'Any residential development of 100 or more houses outside existing settlements/urban areas.' As such the scale of development is likely to preclude potential impacts on the SSSI.</p> <p>The site is located in close proximity to large area of mature woodland, and extensive orchards. The site (including the northern part) is located adjacent to BAP Priority Habitat, including Deciduous Woodland and Lowland Calcareous Grassland.</p> <p>The policy seeks to enhance the biodiversity offer of the site, provide for protected species and ensure that comprehensive arboricultural survey and an ecological improvement strategy.</p>
Cultural Heritage		No features or areas of historic environment sensitivity are located in the vicinity of the site.

Cultural Activity		No significant effects are anticipated.
Health and Wellbeing	+	The policy seeks to enhance public access to orchards and woodland, and secure significant green infrastructure enhancements on site. This will support health and wellbeing.
Vitality of Communities	+	The development of c.10-12 dwellings at this location will help to support the vitality and vibrancy of Kingston near Lewes village and there will be some on site affordable housing provision.
Accessibility	+	The site is accessible to existing village facilities and amenities, including the primary school, village hall, pub and sports/recreational facilities. The site is also, due to its relative proximity to Lewes, accessible to the range of services, facilities and amenities located in the town. However bus links are relatively infrequent, with two-hourly services to Lewes and Newhaven.
Sustainable Transport	?	Bus links are relatively infrequent, with two-hourly services to Lewes and Newhaven. Lewes railway station is located in relative proximity, at 3km north east of the site, which is not within walking distance for many. The site is however accessible to existing village facilities and amenities, which are in walking distance.
Housing	+	The delivery of approximately 10-12 dwellings on this site would help contribute towards meeting local demand for housing.
Climate Change Mitigation	-	The development of approximately 10-12 dwellings at this location will lead to increases in the built footprint of Kingston near Lewes- however, given the amount of housing proposed for this site it is not anticipated that associated effects on greenhouse gas emissions will be significant.
Local Economy	+	Through increasing local housing stock, the delivery of housing at this site has the potential to support the village's vitality.

Summary of appraisal

Summary: Policy SD77: Castelmer Fruit Farm, Kingston Near Lewes

Whilst development at this location has the potential to have negative effects on biodiversity habitats and species, the proposed policy provides a robust approach to ensuring that the ecological networks are protected and enhanced and the most sensitive parts of the site are not developed.

Similarly the policy approach will help protect landscape character, including longer distance views to and from the site. This will be supported by the small size of the allocation, and its location of in the south western portion of the wider ownership site in the area currently occupied by the existing dwelling, the garage, greenhouses and part of the orchard.

In terms of accessibility and sustainable transport links, the site is relatively poorly connected by bus, but is in relative proximity to the wider range of facilities available in Lewes. The site is also accessible to village amenities.

The development of c.10-12 dwellings at the site will help meet local housing needs and support the vitality of the local area.

Potential significant effects?

Due to the relatively limited size of the allocation, and proposed policy approaches, potential negative effects are unlikely to be significant. Similarly potential positive effects are unlikely to be significant.

Recommendations

None proposed.

Agenda Item 12 Report NPA14/17 Appendix 3

SA Report to accompany
Pre-Submission consultation: Appendices

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

Policy SD78: The Pump House, Kingston



Number of dwellings allocated: One permanent pitch for Gypsies and Travellers

Approximate size of site: c.0.03 ha

Sustainability Theme	Rating	Commentary
Landscape		The site has a limited, localised effect on landscape character with views being well contained and it is not subject to overlooking. The allocation only seeks to provide one permanent pitch, which already has temporary permission. Alongside the policy seeks to ensure that existing mature trees and hedgerows bordering the site must be retained and reinforced. This will limit impacts on landscape character.
Climate Change Adaptation		The site is not located within an area at risk of fluvial, surface water or groundwater flooding. The policy seeks to control surface water runoff on the site.
Biodiversity	?	No designated sites or BAP Priority Habitats are located in the vicinity of the site. The site is also not within an SSSI Impact Risk Zone for the types of development proposed. Effects will in part be limited by the allocation of only one pitch at this location and the policy's provision that existing mature trees and hedgerows bordering the site will be retained.
Cultural Heritage		No features or areas of historic environment sensitivity are located in the vicinity of the site.
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		Given the size of the allocation, no significant effects at this level of detail.

Accessibility	?	The site is accessible to existing village facilities and amenities, including the primary school, village hall, pub and sports/recreational facilities. The site is also, due to its relative proximity to Lewes, accessible to the range of services, facilities and amenities located in the town. However bus links are relatively infrequent, with two-hourly services to Lewes and Newhaven.
Sustainable Transport	?	Bus links are relatively infrequent, with two-hourly services to Lewes and Newhaven. Lewes railway station is located in relative proximity, at 3km north east of the site.
Housing	+	The site will deliver one permanent pitch. This will provide a contribution to meeting local needs for Gypsies and Travellers provision.
Climate Change Mitigation	-	The establishment of a permanent pitch at this location will make permanent the increases in the built footprint of Kingston near Lewes. However, given the number of pitches proposed for this site (one) it is not anticipated that associated effects on greenhouse gas emissions will be significant.
Rural Economy		Through facilitating an additional permanent Gypsies and Travellers pitch, the delivery of new provision at this site through the policy has the potential to support the village's vitality. This will however be limited by the proposed size of the allocation.

Summary of appraisal

Summary: Policy SD78: The Pump House, Kingston

The site will deliver one pitch. This will provide a contribution to meeting local needs for Gypsies and Travellers provision.

Potential effects on landscape, biodiversity and the setting of the village will be limited by the restricted size of the allocation and the existing mature trees and hedgerows bordering the site, which will be retained.

The site is accessible to the services and facilities of Kingston and are also relatively accessible to the services and facilities of Lewes.

Potential significant effects?

None identified.

Recommendations

None proposed.

Policy SD79: Land at Old Malling Farm, Lewes



Number of dwellings allocated: c. 220-240

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 240 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 240 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		<p>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.</p>
Health and Wellbeing	+	<p>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.</p>

Agenda Item 12 Report NPA14/17 Appendix 3

SA Report to accompany
Pre-Submission consultation: Appendices

Vitality of Communities	+	The development of 240 dwellings will support the vitality and vibrancy of Lewes through supporting services, facilities and amenities, and the provision of affordable housing on site.
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.240 dwellings. The policy states that 50% of these will be affordable. This will contribute to meeting local housing needs.
Climate Change Mitigation	-	<p>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.</p> <p>The development of 240 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.</p>
Local 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 SD79: 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 delivery of 240 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 SD80: Malling Brooks, Lewes

The proposed allocation has not been assessed as the site has existing planning consents for 7,040m² of B1/B2/B8 employment uses

Policy SD81: West Sussex County Depot and Former Brickworks Site, Midhurst



Number of dwellings allocated: c.65-90 dwellings and other complimentary uses

Approximate size of site: c. 2.7ha

Sustainability Theme	Rating	Commentary
Landscape		Redevelopment of the site has potential for enhancements to townscape/landscape character in the vicinity. Low sensitivity, the site is largely PDL and continuous with the settlement pattern.
Climate Change Adaptation		The site is not located within an area at risk of fluvial or groundwater flooding. Parts of the site are however at risk of surface-water flooding. In this context the policy seeks to provide suitable on-site surface water drainage, minimise hard surfaced areas on site, and use permeable surfaces and soft landscaping where possible to maximise infiltration of water and reduce surface water run-off. This will also be supported by the provision of on-site green infrastructure enhancements promoted by the policy. This will help reduce the risk of surface water flooding.

Agenda Item 12 Report NPA14/17 Appendix 3

SA Report to accompany
Pre-Submission consultation: Appendices

Biodiversity	+	<p>The site is sensitive for biodiversity. The site is within an SSSI Impact Risk Zone for 'residential development of 50 units or more'. This relates to the Iping Common SSSI. Given the policy allocates for 65-90 dwellings, development of this scale has the potential to impact on the integrity of this nationally designated site.</p> <p>The site is also located adjacent to sensitive heathland and woodland at Midhurst Common, which is a LWS. Parts of the site have been identified as potential habitats for protected and notable species. The site adjoins areas of deciduous woodland BAP Priority Habitat. Part of the site is also within the Stedham, Iping and Woolbeding Crescent Biodiversity Opportunity Area.</p> <p>These sensitivities are reflected by the policy for the allocation. The policy states that an arboricultural impact assessment, arboricultural method statement and associated tree protection plan should be prepared alongside new development proposals, as well as an ecology assessment and protected species survey. It also seeks to deliver an ecosystem services-led solution to mitigate the sensitive interface with Midhurst Common, and provide positive enhancements to wildlife habitats within and surrounding the site, whilst providing wildlife corridors within the site as part of a site-specific Wildlife Management and Enhancement Plan. It also seeks to protect trees on the site.</p> <p>Given this wide-ranging comprehensive approach, it is considered that the policy has the potential to enable enhancements to the biodiversity offer of the site and minimise the potential impacts of new residential development at this location.</p>
Cultural Heritage	+	<p>The site contains part of the route of the Midhurst-Petersfeld railway line, a non-designated heritage asset. The policy seeks to protect this route.</p> <p>No listed buildings or scheduled monuments are located in the vicinity of the site and the site is not located in proximity to a conservation area.</p>
Cultural Activity		The site has good accessibility to the cultural opportunities afforded by its location in Midhurst.
Health and Wellbeing		No significant effects are anticipated.
Vitality of Communities	+	The development of c.65-90 dwellings will support the vitality and vibrancy of Midhurst through supporting services, facilities and amenities and the provision of affordable housing on site.
Accessibility	+	Located 800m from the town centre, the site is accessible to the wide range of existing facilities and services located in Midhurst. This will support accessibility to amenities.
Sustainable Transport	?	The site, which is located approximately 0.8km to the centre of Midhurst by foot/cycle, has good accessibility to the services and facilities in the town. This will support the use of sustainable modes of transport.
Housing	+	The site will deliver 65-90 dwellings. This will contribute to meeting local housing needs.

Climate Change Mitigation	-	The site has good accessibility to the services and facilities in the town. This will support climate change mitigation by reducing the need to travel. The development of 65-90 dwellings at this location will lead to increases in the built footprint of Midhurst- however, given existing uses on the site, it is not anticipated that associated effects on greenhouse gas emissions will be significant.
Local Economy		As a residential site within a town location, no significant effects are anticipated. However development at this location will lead to the minor loss of employment uses such as storage, small-scale office space and stone crushing activities.

Summary of appraisal

Summary: SD81: West Sussex County Depot and Former Brickworks Site, Midhurst

The current use of the site provides opportunities for enhancements to townscape and biodiversity. In this context the policy approach for the allocation will lead to a number of benefits through enhancing habitats and ecological networks and facilitating significant enhancements to the public realm. The policy's focus on green infrastructure enhancements will also support climate change adaptation.

The site, which is located approximately 800m to the centre of Midhurst, has good accessibility to the services and facilities in the town by walking/cycling and public transport.

Potential significant effects?

None identified at this level of detail.

Recommendations

None proposed.

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

Policy SD82: Holmbush Caravan Park, Midhurst



Number of dwellings allocated: c.50-70

Approximate size of site: c. 5ha

Sustainability Theme	Rating	Commentary
Landscape	?	<p>The site is a former sand pit which has not been infilled. It is very hidden from surrounding views as a result and is quite detached from the surrounding settlement pattern. Previously used as a mobile home park, the site is now disused.</p> <p>The site has an unusual history which makes parts of it PDL. However it has inherent landscape character qualities and potential heathland opportunities which make it medium sensitivity.</p> <p>This is recognised by the policy which seeks to implement suitable site boundary treatments, protect trees on site and secure the implementation of a Landscape Visual Assessment to accompany new development.</p>
Climate Change Adaptation	?	<p>The site is located within an area at risk of flooding. Fluvial flood zones 2 and 3 are present in the centre of the site (around the pond), some locations within the site are at risk of surface water flooding and the site is identified as an area of high groundwater floor risk.</p> <p>This is recognised by the policy which seeks to ensure new development is only located in Flood Zone 1 and suitable flood risk mitigation measures are implemented. The policy also seeks to minimise hard surfaced areas on site, and use permeable surfaces and soft landscaping where possible to maximise infiltration of water and reduce surface water run-off.</p> <p>In relation to groundwater flood risk, the policy seeks to ensure that hydrogeological surveys are carried out prior to development.</p>

Agenda Item 12 Report NPA14/17 Appendix 3

SA Report to accompany
Pre-Submission consultation: Appendices

Biodiversity	?	<p>Some areas of deciduous woodland BAP Priority Habitat are located within and adjacent to the site. Trees on the site are subject to TPOs. The site is not located within an SSSI Impact Risk Zone for the scale of residential development proposed.</p> <p>The policy seeks to protect and enhance trees within the site where possible and trees on the site boundary should be retained and new tree planting should be undertaken. The policy also seeks to retain suitable existing habitat for pollinating species where possible and facilitate new planting.</p>
Cultural Heritage		The site is not sensitive for historic environment interest. No listed buildings or scheduled monuments are located in the vicinity of the site and the site is not located in proximity to a conservation area. No significant effects are anticipated therefore.
Cultural Activity		The site has good accessibility to the cultural opportunities afforded by its location in Midhurst.
Health and Wellbeing		No significant effects are anticipated.
Vitality of Communities	+	The development of c.50-70 dwellings will support the vitality and vibrancy of Midhurst through supporting services, facilities and amenities and the provision of affordable housing on site.
Accessibility	+	Located 900m from the town centre, the site is accessible to the wide range of existing facilities and services located in Midhurst. This will support accessibility to amenities.
Sustainable Transport	+	The site, which is located approximately 0.9km to the centre of Midhurst by foot/cycle, has good accessibility to the services and facilities in the town. This will support the use of sustainable modes of transport.
Housing	+	The site will deliver 50-70 dwellings. This will contribute to meeting local housing needs.
Climate Change Mitigation	-	The site has good accessibility to the services and facilities in the town. This will support climate change mitigation by reducing the need to travel. The development of 50-70 dwellings at this location will lead to increases in the built footprint of Midhurst- however, given the amount of housing proposed for this site, and, existing uses on the site, it is not anticipated that associated effects on greenhouse gas emissions will be significant.
Local Economy		As a residential site within a town location, no significant effects are anticipated.
Summary of appraisal		

Summary: Policy SD82: Holmbush Caravan Park, Midhurst

Flood risk on the site is recognised by the policy which seeks to ensure new development is only located in Flood Zone 1 and suitable flood risk mitigation measures are implemented. Potential impacts from new development on biodiversity and landscape character will be minimised and enhancements secured through the proposed policy approaches for the site allocation.

The site, which is located approximately 900m to the centre of Midhurst, has good accessibility to the services and facilities in the town by walking/cycling and public transport.

Potential significant effects?

None identified at this level of detail.

Recommendations

None proposed.

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

Policy SD83: Land at The Fairway, Midhurst



Number of dwellings allocated: c.8-10

Approximate size of site: c. 0.1ha

Sustainability Theme	Rating	Commentary
Landscape		<p>The site is set down below the level of the adjacent A286 due to the former sand pit adjacent. As a result it has a private and isolated character this is further enhanced by the high degree of tree cover and lack of other development in the view. A tunnel which formed part of the Midhurst-Pulborough railway is now closed and is located to the south of the site.</p> <p>The site has low landscape sensitivity due to PDL status and restricted views. Railway tunnel context is important and existing trees are important to site context. This is recognised by the policy which seeks to implement a Arboricultural Impact Assessment, Arboricultural Method Statement and associated Tree Protection Plan.</p>
Climate Change Adaptation		The site is not located within an area at risk of fluvial, surface water or groundwater flooding.
Biodiversity	?	There is evidence of protected species including the Greater Horseshoe Bat and Brown Long-eared Bat being present on the site, which are likely to use the existing hornbeam tree. The policy seeks to retain this key feature. It also seeks to implement a Arboricultural Impact Assessment, Arboricultural Method Statement and associated Tree Protection Plan.
Cultural Heritage	+	Whilst no listed buildings are present in the vicinity of the site, and the site is not within a conservation area, a disused railway tunnel entrance in the southeast corner of the site provides historical character and context. This is recognised by the policy which seeks to enhance the setting of this feature.
Cultural Activity		The site has good accessibility to the cultural opportunities afforded by its location in Midhurst.
Health and Wellbeing		No significant effects are anticipated.
Vitality of Communities	+	The development of c.8-10 dwellings will help to support the vitality and vibrancy of Midhurst and there will be some on site affordable housing provision. There will be the loss of some car parking on the site.

Agenda Item 12 Report NPA14/17 Appendix 3

SA Report to accompany
Pre-Submission consultation: Appendices

Accessibility	+	Located 950m from the town centre, the site is accessible to the wide range of existing facilities and services located in Midhurst. This will support accessibility to amenities.
Sustainable Transport	?	The site, which is located approximately 900m to the centre of Midhurst by foot/cycle, has good accessibility to the services and facilities in the town. This will support the use of sustainable modes of transport.
Housing	+	The site will deliver 8-10 dwellings. This will contribute to meeting local housing needs.
Climate Change Mitigation	-	The site has good accessibility to the services and facilities in the town. This will support climate change mitigation by reducing the need to travel. The development of 8-10 dwellings at this location will lead to increases in the built footprint of Midhurst- however, given the amount of housing proposed for this site, and, existing uses on the site, it is not anticipated that associated effects on greenhouse gas emissions will be significant.
Local Economy		As a residential site within a town location, no significant effects are anticipated.

Summary of appraisal

Summary: SD83: Land at the Fairway, Midhurst

The site is not sensitive for landscape and is not located within an area at risk of fluvial, surface water or groundwater flooding. In relation to biodiversity, the value of existing trees on the site are recognised through the policy.

A disused railway tunnel entrance in the southeast corner of the site provides historical character and context. This is recognised by the policy which seeks to enhance the setting of this feature.

The site, which is located approximately 900m to the centre of Midhurst, has good accessibility to the services and facilities in the town by walking/cycling and public transport.

Potential significant effects?

Due to the relatively limited size of the allocation, and proposed policy approaches, potential negative effects are unlikely to be significant. Similarly potential positive effects are unlikely to be significant.

Recommendations

None proposed.

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

Policy SD84: Land at Lamberts Lane, Midhurst



Number of dwellings allocated: c. 20

Approximate size of site: c.0.4 ha

Sustainability Theme	Rating	Commentary
Landscape	?	Allocation of 20 dwellings at this site has the potential to affect sensitive townscape as the site is located on the opposite side of Lamberts Lane to the Midhurst Conservation Area and the Grade II listed Lassiters Cottage. The policy recognises this through seeking to ensure that careful consideration is given to the frontage of Lamberts Lane and a Heritage Statement and a Landscape and Visual Impact Assessment is undertaken to inform design and layout.
Climate Change Adaptation		The site is not located within an area at risk of fluvial, surface water or groundwater flooding.
Biodiversity		No designated sites or BAP Priority Habitat are located in the vicinity of the site and the site is not within an SSSI Impact Risk Zone for the types of development proposed. The policy also seeks to ensure that an appropriate ecological survey is undertaken. The group of trees in the north west corner of the site may have some biodiversity value.
Cultural Heritage	?	<p>Located on the opposite side of Lamberts Lane to the Midhurst Conservation Area, the allocation of 20 dwellings at this site has the potential to affect areas sensitive for its historic environment value. The allocation also has the potential to affect the setting of the Grade II listed Lassiters Cottage.</p> <p>The policy recognises this through seeking to ensure that careful consideration is given to the frontage of Lamberts Lane and a Heritage Statement and a Landscape and Visual Impact Assessment is undertaken to inform design and layout.</p> <p>Access to the site is via Lamberts lane, which has a relatively narrow entrance and is within the conservation area. As such an increase in traffic resulting from the allocation of 20 dwellings has the potential to lead to impacts on the setting of the historic environment at this location.</p>
Cultural Activity		The site is located in good proximity to the cultural services offered by Midhurst. The allocation is unlikely to have significant positive or negative effects relating to sustainable tourism.

Agenda Item 12 Report NPA14/17 Appendix 3

SA Report to accompany
Pre-Submission consultation: Appendices

Health and Wellbeing	?	Development of the site will lead to the loss of former community facilities, including tennis courts and buildings previously used for community purposes. This will reduce recreational offer in the town. However, these are currently disused. The site is located approximately 0.4km to the centre of Midhurst by foot/cycle. The location of the site therefore has the potential to promote healthier modes of travel to services and facilities.
Vitality of Communities	+	The development of 20 dwellings will help to support the vitality and vibrancy of Midhurst and there will be some on site affordable housing provision.
Accessibility	+	The site, which is located approximately 0.4km to the centre of Midhurst by foot/cycle, has very good accessibility to the services and facilities in the town.
Sustainable Transport	+	The site, which is located approximately 0.4km to the centre of Midhurst by foot/cycle, has very good accessibility to the services and facilities in the town. This will support the use of sustainable modes of transport.
Housing	+	The site will deliver 20 dwellings. This will contribute to meeting local housing needs.
Climate Change Mitigation	-	The site has good accessibility to the services and facilities in the town. This will support climate change mitigation by reducing the need to travel. The development of 20 dwellings at this location will lead to increases in the built footprint of Midhurst- however, given the amount of housing proposed for this site it is not anticipated that associated effects on greenhouse gas emissions will be significant.
Local Economy		As a residential site within a central location, no significant effects are anticipated.

Summary of appraisal

Summary: Policy SD84: Land at Lamberts Lane, Midhurst

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.

Potential significant effects?

Due to the proposed policy approaches, potential negative effects are unlikely to be significant. Due to the size of the proposed allocation, potential positive effects are also unlikely to be significant.

Recommendations

None proposed.

Key

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

Policy SD85: Land at Park Crescent. Midhurst



Number of dwellings allocated: c.8-12

Approximate size of site: c. 0.3ha

Sustainability Theme	Rating	Commentary
Landscape	?	<p>The site is a small steeply sloping area of land laid to lawn/pasture. It is part of the plot associated with the adjacent dwelling house. It is located in an area of quite high density housing.</p> <p>The site has low-medium sensitivity due to small size of site and limited visibility. The western part of the site, which slopes, provides a stronger contribution to landscape character. In acknowledgement of this, the policy will support landscape character through seeking to implement additional planting at site boundaries and protect existing mature trees on the site.</p>
Climate Change Adaptation		The site is not located within an area at risk of fluvial, surface water or groundwater flooding.
Biodiversity		The site is not sensitive for biodiversity. It is not located within an SSSI Impact Risk Zone for residential development and is not located in close proximity to BAP Priority Habitat. There are a number of mature trees on and in the vicinity of the site; the policy seeks to protect these.
Cultural Heritage	?	The site is not sensitive for historic environment interest. No listed buildings or scheduled monuments are located in the vicinity of the site and the site is not located in proximity to a conservation area. However access to the site is via Lamberts lane, which has a relatively narrow entrance and is within the conservation area. As such an increase in traffic resulting from the allocation has the potential to lead to impacts on the setting of the historic environment at this location, although this is likely to be minor.
Cultural Activity		The site has good accessibility to the cultural opportunities afforded by its location in Midhurst.
Health and Wellbeing		No significant effects are anticipated.

Agenda Item 12 Report NPA14/17 Appendix 3

SA Report to accompany
Pre-Submission consultation: Appendices

Vitality of Communities	+	The development of c.8-12 dwellings will help to support the vitality and vibrancy of Midhurst and there will be some on site affordable housing provision. .
Accessibility	+	Located only 200m from North Street, the site is very accessible to the wide range of existing facilities and services located in Midhurst. This will support accessibility to amenities.
Sustainable Transport	+	The site, which is located approximately 200m to North Street by foot/cycle, has extremely good accessibility to the services and facilities in the town. This will support the use of sustainable modes of transport.
Housing	+	The site will deliver 8-12 dwellings. This will contribute to meeting local housing needs.
Climate Change Mitigation	-	The site has excellent accessibility to the services and facilities in the town. This will support climate change mitigation by reducing the need to travel. The development of 8-12 dwellings at this location will lead to increases in the built footprint of Midhurst- however, given the amount of housing proposed for this site, and, existing uses on the site, it is not anticipated that associated effects on greenhouse gas emissions will be significant.
Local Economy	+	As a residential site within a town location, no significant effects are anticipated.

Summary of appraisal

Summary: SD85: Land at Park Crescent. Midhurst

The site has excellent accessibility to the services, facilities and amenities in Midhurst, including by foot.

The site is not located in an area sensitive for biodiversity, the historic environment or landscape character, and is not within an area at risk of flooding.

Potential significant effects?

Due to the proposed policy approaches, potential negative effects are unlikely to be significant. Due to the size of the proposed allocation, potential positive effects are also unlikely to be significant.

Recommendations

None proposed.

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

Policy SD86: Offham Barns, Offham



Number of dwellings allocated: Four permanent pitches for Gypsies and Travellers

Approximate size of site: c.0.3 ha

Sustainability Theme	Rating	Commentary
Landscape	?	<p>The proposed allocation of four pitches is next to an existing Gypsies and Travellers site. The site has a limited, localised effect on landscape character with views being well contained and it is not subject to overlooking.</p> <p>As such no significant effects on landscape character are likely to arise from the allocation.</p>
Climate Change Adaptation		<p>The site is not located within an area at risk of fluvial or groundwater flooding. Areas of 1 in 100 year and 1 in 1000 year surface water flood risk are present within the site. This is reflected by the policy for the allocation, which states that surface water drainage should be managed.</p>
Biodiversity		<p>The site is not located close to sites designated for biodiversity interest. It is not within an SSSI Impact Risk Zone for the type of development proposed or located adjacent to BAP Priority Habitat.</p> <p>The policy seeks to protect existing hedgerows.</p>
Cultural Heritage		<p>No features or areas of historic environment sensitivity are located in the vicinity of the site.</p>
Cultural Activity		<p>The allocation is unlikely to have significant positive or negative effects relating to sustainable tourism.</p>
Health and Wellbeing		<p>No significant effects at this level of detail.</p>
Vitality of Communities		<p>Given the size of the allocation, no significant effects at this level of detail.</p>
Accessibility	+	<p>The site is, due to its relative proximity to Lewes (c.3km), accessible to the range of services, facilities and amenities located in this nearby town and the railway station. The site is also accessible to the services and facilities at Cooksbridge, which is located c.1km away. Bus links are also good, with a half hourly service during the day to Lewes and Cooksbridge.</p>
Sustainable Transport	+	<p>Bus links are good, with a half hourly service during the day to Lewes and Cooksbridge. The site is located 3.4km from Lewes railway station.</p>

Agenda Item 12 Report NPA14/17 Appendix 3

SA Report to accompany
Pre-Submission consultation: Appendices

Housing	+	The site will deliver four permanent pitches. This will contribute to meeting local needs for Gypsies and Travellers provision.
Climate Change Mitigation	-	Given the number of pitches proposed for this site (four) it is not anticipated that associated effects on greenhouse gas emissions will be significant.
Rural Economy		Given the size of the allocation, no significant effects.

Summary of appraisal

Summary: Policy SD86: Offham Barns, Offham

The development of four permanent pitches at the site will help meet local needs for Gypsies and Travellers provision. The site is also accessible by public transport to the services and facilities of Cooksbridge and Lewes.

The site is not located in a location sensitive for landscape character, biodiversity or historic environment.

Potential significant effects?

None identified.

Recommendations

None proposed.

Policy SD87: Land at Church Lane, Pyecombe

The proposed allocation has not been assessed as the site has existing planning consents for 8 dwellings.

Policy SD88: Land at Ketchers Field, Selborne



Number of dwellings allocated: c.5-6

Approximate size of site: c. 0.2ha

Sustainability Theme	Rating	Commentary
Landscape	?	<p>The site slopes to the south. The site is currently used for seasonal workers accommodation and there are several huts which provide this. The surrounding boundaries are hedged.</p> <p>Medium-high sensitivity, the site is located on an existing PROW within the National Park. The site is not large scale and has buildings on it. However it is located on the outer edge of existing development in a highly sensitive location. Existing screening may not be adequate to mitigate for potential effects.</p> <p>This is recognised by the policy which seeks to ensure a suitable transition in built form and fabric from the housing to the west to the open countryside to the east and integrate site boundaries sympathetic to the local landscape. It also seeks to initiate an appropriate landscape assessment alongside new development proposals as well as retain and protect existing trees.</p>
Climate Change Adaptation	+	<p>The site is not located within an area at risk of fluvial or groundwater flooding.</p> <p>Some areas of surface water flood risk are present on the site. This is acknowledged by the policy, which seeks to minimise hard surfaced areas on site, and use permeable surfaces and soft landscaping where possible to maximise infiltration of water and reduce surface water run-off.</p>
Biodiversity	?	<p>The site is located approximately 300m from the East Hampshire Hangars SAC. The SAC is covered by the Selborne Common SSSI; however the site is only located in an Impact Risk Zone for 'residential development of ten units or more'. As such, it is not considered that the allocation of 5-6 dwellings on the site will lead to impacts on the integrity of the SPA</p> <p>The site is not located adjacent to areas of BAP Priority Habitat. The site contains some mature trees, which the policy seeks to retain.</p> <p>The policy seeks to ensure that new development supports the aims of the Hampshire Hangers Biodiversity Opportunity Area, within which the site is located.</p>

Agenda Item 12 Report NPA14/17 Appendix 3

SA Report to accompany
Pre-Submission consultation: Appendices

Cultural Heritage	?	The site is located close to the boundaries of the Selborne Conservation Area. This is recognised by the policy which supports sympathetic site boundaries.
Cultural Activity		No significant effects are anticipated.
Health and Wellbeing		No significant effects are anticipated.
Vitality of Communities	+	The development of new housing through the allocation will help to support the vitality and vibrancy of Selborne village and there will be some on site affordable housing provision.
Accessibility	+	The site is accessible to existing village facilities and amenities, including the primary school, village store/post office and pub. The site is approximately 8km to Alton and 7km to Liss for a wider range of services and facilities.
Sustainable Transport	?	The site is located in proximity to services on the Petersfield to Alton bus route, with a service every 1-2 hours during the day.
Housing	+	The delivery of approximately 5-6 new dwellings on this site would help contribute towards meeting local demand for housing.
Climate Change Mitigation	-	The development of approximately 5-6 dwellings at this location will lead to increases in the built footprint of Selborne- however, given the amount of housing proposed for this site it is not anticipated that associated effects on greenhouse gas emissions will be significant.
Local Economy	+	Through increasing local housing stock, the delivery of housing at this site has the potential to support the village's vitality.

Summary of appraisal

Summary: SD88: Land at Ketchers Field, Selborne

Whilst the site is sensitive in landscape terms, impacts from the site allocation on landscape character will be limited by the relatively small size of the allocation, the previously developed nature of part of the site, the presence of modern housing bordering the site and the policy approach which seeks to limit impacts on landscape character.

Potential effects on biodiversity are likely to be limited by the relatively small size of the allocation and the policy approaches initiated for the site allocation. Similarly the proximity of the site to areas of historic environment interest is reflected by the proposed policy approach.

Potential significant effects?

Due to the proposed policy approaches, potential negative effects are unlikely to be significant. Due to the size of the proposed allocation, potential positive effects are also unlikely to be significant.

Recommendations

None proposed.

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

Policy SD89: Land at Pulens Lane, Sheet



Number of dwellings allocated: c.30-32 dwellings and publicly accessible open space

Approximate size of site: c. 3.6ha

Sustainability Theme	Rating	Commentary
Landscape	?	<p>The site sits on the banks of the River Rother, a major landscape feature in the SDNP and in the Petersfield area. The site comprises a large linear field which is bounded by rear gardens to the south and west and the River Rother to the north.</p> <p>The site is medium-high sensitivity due to the constraints of the site and its setting, together with the importance of the River Rother as a major valley feature.</p> <p>Potential effects on landscape character will be limited by the SDNPA's commitment to prepare a development brief for the site, and the undertaking of a Landscape Visual Impact Assessment.</p>
Climate Change Adaptation		<p>Given the presence of the River Rother, parts of the site are within Flood Zone 2 and 3. This is recognised by the policy which seeks to ensure suitable fluvial and surface water flood mitigation measures are implemented with new development at this location, and as part of the proposed Development Brief.</p> <p>The site is not located within an area at risk of groundwater flooding.</p>
Biodiversity	?	<p>The site is located adjacent to a significant area of deciduous woodland BAP Priority Habitat, which is located along the River Rother. The River Rother is a key ecological corridor, providing ecological linkages. This is recognised by the presence of the Rother Biodiversity Opportunity Area.</p> <p>The policy recognises the importance of this corridor by proposing the development of a woodland park adjacent to the River Rother of approximately 20m in width. The policy also seeks to enhance biodiversity and provide for protected species and protect and enhance trees within the site.</p> <p>These elements will be supported by the preparation of a Development Brief for the site by the SDNPA.</p>
Cultural Heritage	?	<p>The Grade II listed Mill Cottage is located to the north of the site.</p> <p>The historic environment and setting of the site will be supported by the preparation of the Development Brief by the SDNPA.</p>

Agenda Item 12 Report NPA14/17 Appendix 3

SA Report to accompany
Pre-Submission consultation: Appendices

Cultural Activity		No significant effects are anticipated.
Health and Wellbeing	+	Green infrastructure enhancements proposed for the site, including the development of a woodland park adjacent to the River Rother will support health and wellbeing by promoting access to open space to all.
Vitality of Communities	+	The development of 30-32 dwellings will help to support the vitality and vibrancy of Sheet and Petersfield and there will be some on site affordable housing provision.
Accessibility	?	The site, which is located approximately 1.2km to the centre of Petersfield, has good accessibility to the services and facilities in the town. There are however some vehicular access issues for the site.
Sustainable Transport	?	The site, which is located approximately 1.2km to the centre of Petersfield (and slightly further from the railway station) has good accessibility to the services and facilities in the town by walking/cycling and public transport. This will support the use of sustainable modes of transport.
Housing	+	The site will deliver 30-32 dwellings. This will contribute to meeting local housing needs.
Climate Change Mitigation	-	The site has good accessibility to the services and facilities in Petersfield. This will support climate change mitigation by reducing the need to travel in comparison to other site options. The development of 30-32 dwellings at this location will lead to increases in the built footprint of Sheet; however, given the amount of housing proposed for this site it is not anticipated that associated effects on greenhouse gas emissions will be significant.
Local Economy	+	As a residential site within a built up area, no significant effects are anticipated.

Summary of appraisal:

Summary: SD89: Land at Pulens Lane, Sheet

Potential impacts of new development on landscape character, biodiversity networks and the historic environment will be minimised (and enhancements secured) through the SDNPA's commitment to prepare a development brief for the site.

Green infrastructure enhancements proposed for the site, including the development of a woodland park adjacent to the River Rother will support health and wellbeing, biodiversity enhancements and help support landscape character.

The site is in good proximity to the services and facilities in Petersfield and public transport links.

Potential significant effects?

Due to the proposed policy approaches, potential negative effects are unlikely to be significant.

Recommendations

None proposed

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

Policy SD90: Land at Loppers Ash, South Harting



Number of dwellings allocated: c.6-8 dwellings

Approximate size of site: c.0.6 ha

Sustainability Theme	Rating	Commentary
Landscape	?	<p>Whilst the landscape character assessment assessed the site as being of medium sensitivity (due to views to and from the chalk ridge and the edge of settlement location), it has also been established that careful development with density to mirror existing and adjacent properties would be appropriate.</p> <p>In this context the proposed policy states that new development should incorporate open space in the centre of the site to retain wider landscape views from New Lane.</p>
Climate Change Adaptation		<p>The site is not located within an area at risk of fluvial, surface water or groundwater flooding.</p> <p>An area of surface water flood risk is present adjacent to the site and across the site access.</p>
Biodiversity		<p>This site does not fall within an SSSI Impact Risk Zone for the types of development proposed and no biodiversity designations or BAP Priority Habitats are located in the vicinity of the site. As such there are no significant constraints on this development from a biodiversity perspective.</p>
Cultural Heritage	?	<p>The archaeological potential of the site is recognised by the policy, which states that the site is subject to archaeological constraints and that a pre-application archaeological assessment will be required to ensure that no impacts on heritage value occur.</p> <p>The historic rural lane is an undesignated heritage asset.</p> <p>As discussed above under the landscape sustainability theme, the policy seeks to protect landscape quality in this location. This will support the setting of the historic environment.</p>
Cultural Activity		No significant effects are anticipated.
Health and Wellbeing		No significant effects are anticipated.
Vitality of Communities	+	<p>The development of, in the region of 6-8 dwellings will help to support the vitality and vibrancy of South Harting village and there will be some on site affordable housing provision. the vitality and vibrancy of South Harting through the provision of affordable housing on site</p>

Agenda Item 12 Report NPA14/17 Appendix 3

SA Report to accompany
Pre-Submission consultation: Appendices

Accessibility	+	The proposed development site adjoins the village and so will have good access to local services and facilities, including the Primary School, pub, sports facilities and churches.
Sustainable Transport	?	Due to infrequent bus services to Petersfield, the allocation is likely to encourage travel by car.
Housing	+	The construction of around 6-8 additional dwellings on this site would contribute positively to the meeting of local need for housing. A policy target of at least 40% of all net dwellings being affordable (Strategic Policy SD?) could increase access of younger villagers to local housing.
Climate Change Mitigation	-	The distance between South Harting and Petersfield, and the relative difficulty of travelling between the two settlements by bus, may result in an increase in private car use with resulting negative effects in terms of CO ₂ emissions. However, given the amount of housing proposed for this site it is not anticipated that these effects will be significant.
Local 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 SD90: Land at Loppers Ash, South Harting

Positive effects associated with the proposed allocations include the provision of new housing to meet local needs and benefits associated with the vitality of South Harting.

This site is potentially constrained from an archaeological heritage perspective and it will be important that any potential impacts are identified and suitably mitigated. This is recognised by the policy. The site is not significantly constrained by biodiversity considerations.

The site has limited access by sustainable transport modes due to poor connections to Petersfield by bus.

Potential significant effects?

None anticipated.

Recommendations

None proposed.

Policy SD91: Land North of the Forge, South Harting



Number of dwellings allocated: c.5-6 dwellings

Approximate size of site: c. 0.1ha

Sustainability Theme	Rating	Commentary
Landscape	?	<p>The site is part of an existing arable field. There is no boundary hedgerow along the roadside. To the north-west side of the site there are existing dwellings and opposite the site is a recent housing development.</p> <p>The site has medium landscape sensitivity. This is recognised by the policy, which seeks to ensure development preserves and enhances the setting of South Harting Conservation Area, with special regard to views from the west and provide a suitably landscaped transition to the river valley.</p>
Climate Change Adaptation	?	<p>No fluvial or groundwater flood zones are present on the site.</p> <p>Parts of the site are at risk of surface-water flooding. In this context the policy seeks to provide suitable on-site surface water drainage and minimise hard surfaced areas on site. This will help reduce the risk of surface water flooding.</p>
Biodiversity		<p>Whilst the site is not within an Impact Risk Zone, and does not have any BAP Priority Habitats present, the adjacent stream valley is of ecological value. The policy seeks to incorporate appropriate surface water drainage to preclude impacts on the corridor.</p>
Cultural Heritage	?	<p>The site is located close to the Grade II listed Sunnyside Cottage. The site is of importance to the setting of South Harting Conservation Area. The historic environment value of the site is recognised by the policy, which seeks to preserve and enhance the setting of the South Harting Conservation Area, with special regard to views from the west.</p>
Cultural Activity		<p>No significant effects are anticipated.</p>
Health and Wellbeing		<p>No significant effects are anticipated.</p>
Vitality of Communities	+	<p>The development of, in the region of 6-8 dwellings will help to support the vitality and vibrancy of South Harting village and there will be some on site affordable housing provision.</p>

Agenda Item 12 Report NPA14/17 Appendix 3

SA Report to accompany
Pre-Submission consultation: Appendices

Accessibility	+	The proposed development site adjoins the village and so will have good access to local services and facilities, including the Primary School, pub, sports facilities and churches.
Sustainable Transport	?	Due to infrequent bus services to Petersfield, the allocation is likely to encourage travel by car.
Housing	+	The construction of around 6-8 additional dwellings on this site would contribute positively to the meeting of local need for housing. A policy target of at least 40% of all net dwellings being affordable (Strategic Policy SD?) could increase access of younger villagers to local housing.
Climate Change Mitigation	-	The distance between South Harting and Petersfield, and the relative difficulty of travelling between the two settlements by bus, may result in an increase in private car use with resulting negative effects in terms of CO ₂ emissions. However, given the amount of housing proposed for this site it is not anticipated that these effects will be significant.
Local 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: SD91 Land North of the Forge, South Harting

Positive effects associated with the proposed allocations include the provision of new housing to meet local needs and benefits associated with the vitality of South Harting.

This site is potentially constrained from an archaeological heritage perspective and it will be important that any potential impacts are identified and suitably mitigated. This is recognised by the policy. The site is not significantly constrained by biodiversity considerations.

The site has limited access by sustainable transport modes due to poor connections to Petersfield by bus.

Potential significant effects?

None anticipated.

Recommendations

None proposed.

Key

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

Policy SD92: Stedham Sawmill, Stedham



Number of dwellings allocated: c.16-20 dwellings and 3,000m² of employment floorspace

Approximate size of site: c. 1.3ha

Sustainability Theme	Rating	Commentary
Landscape	+	<p>The site is adjacent to an important area of common land (Iping Common) and is surrounded by woodland to the west. To the east of the site is an area of horse pasture and polo fields beyond. The site comprises a large area of open ground which appears to be regenerating and the built area of the site which comprises industrial buildings and associated screening vegetation.</p> <p>The site is of medium-high landscape sensitivity due to its important and sensitive location adjacent to Iping common and limited connectivity to the settlement. However, half the site is PDL and the remainder offers potential for heathland regeneration.</p> <p>The policy seeks to ensure a Landscape Visual Impact Assessment is undertaken to support new development, existing mature trees are protected and new planting initiated.</p>
Climate Change Adaptation		The site is not located within an area at risk of fluvial, surface water or groundwater flooding.
Biodiversity	?	<p>The site has significant biodiversity constraints. The site is located adjacent to the Iping Common SSSI. As such it is located within the SSSI's Impact Risk Zone for 'residential development of 10 units or more'. The site is also located adjacent to deciduous woodland BAP Priority Habitat.</p> <p>These constraints are recognised by the policy which seeks to ensure that new development demonstrates that there would be no significant impact on the Iping Common SSSI through development of the site, existing mature trees would be retained, space is allowed for new tree planting, and new planting should be suitable for pollinating species.</p>
Cultural Heritage	?	The Grade II listed Fry's Farmhouse is located adjacent to the northern boundary of the site. The policy seeks to ensure a Heritage Statement is prepared to support new development
Cultural Activity		No significant effects are anticipated.

Agenda Item 12 Report NPA14/17 Appendix 3

SA Report to accompany
Pre-Submission consultation: Appendices

Health and Wellbeing		No significant effects are anticipated.
Vitality of Communities	+	The development of c.16-20 dwellings will help to support the vitality and vibrancy of Stedham village and there will be some on site affordable housing provision.
Accessibility	+	The site is accessible to existing village facilities and amenities, including the school, pub and sports/recreational facilities. The site is also, due to its relative proximity to Midhurst (c.3.5km), accessible to the range of services, facilities and amenities located in this nearby larger town. Bus links between Stedham and Midhurst/Petersfield are however relatively infrequent with services once every 1-2hours during the day.
Sustainable Transport	?	Whilst the site is located close to an existing bus link to Midhurst and Petersfield, this is limited to a once every 1-2hours service during the day.
Housing	+	The delivery of approximately 16-20 dwellings on this site would help contribute towards meeting local demand for housing.
Climate Change Mitigation	-	The development of approximately 16-20 dwellings at this location will lead to increases in the built footprint of Stedham- however, given the amount of housing proposed for this site it is not anticipated that associated effects on greenhouse gas emissions will be significant.
Local Economy	+	Through increasing local housing stock, the delivery of housing at this site has the potential to support the village's vitality. Whilst there will be loss of existing employment provision, this will be replaced with up to 3,000m ² of B1 use employment floorspace.

Summary of appraisal:

Summary: Policy SD92: Stedham Sawmill, Stedham

The location of the site on previously developed land will help limit impacts on landscape and villagescape character and offers opportunities for enhancements to the public realm and heathland regeneration.

The biodiversity constraints present in the vicinity of the are recognised by the policy, which seeks to ensure that new development demonstrates that there would be no significant impact on the Iping Common SSSI through development of the site, and development is accompanied by an enhancement of habitats on site.

The development of 16-20 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 Midhurst by bus. Whilst there will be loss of existing employment provision, this will be replaced with up to 3,000m² of B1 use employment floorspace.

Potential significant effects?

None identified.

Recommendations

None proposed.

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

Policy SD93: Land South of Church Road, Steep



Number of dwellings allocated: c.8-12 dwellings

Approximate size of site: c. 0.7ha

Sustainability Theme	Rating	Commentary
Landscape	?	<p>The site is a small scale sloping pasture/rough grass area to the east of the existing village hall and informal gravel surfaced car park. The whole site (including the hall) is bounded by mature trees consistent with the surrounding wooded landscape character.</p> <p>The site has medium high sensitivity for development of any density or depth owing to the surrounding settlement character. Development of the site would likely require access improvements to the site entrance which would be likely to erode local rural character. Views of the boundary trees would be lost to development together with the loss of a distinctive open area in the settlement which contributes to its rural character.</p> <p>This is recognised by the policy, which seeks to ensure an Arboricultural Impact Assessment, Arboricultural Method Statement and associated Tree Protection Plan are undertaken and prepared, retain and protect existing mature trees, and initiate site boundaries sympathetic to the landscape.</p>
Climate Change Adaptation		The site is not located within an area at risk of fluvial, surface water or groundwater flooding.
Biodiversity	?	<p>The site is located approximately 600m from the East Hampshire Hangars SAC. The SAC is covered by the Weldon Edge Hangars SSSI; however the site is only located in an SSSI Impact Risk Zone for 'residential development of 100 units or more'. As such, it is not considered that the allocation of 8-12 dwellings on the site will lead to impacts on the integrity of the SPA</p> <p>The site is located within the Hampshire Hangars Biodiversity Opportunity Area.</p> <p>The site is located adjacent to areas of deciduous woodland BAP Priority Habitat. The policy seeks to retain and protect mature trees in the vicinity of the site.</p>
Cultural Heritage	?	The Grade II listed War memorial is located directly opposite the site. The policy states that new development should be accompanied by a Heritage Statement.
Cultural Activity		No significant effects are anticipated.

Agenda Item 12 Report NPA14/17 Appendix 3

SA Report to accompany
Pre-Submission consultation: Appendices

Health and Wellbeing		No significant effects are anticipated.
Vitality of Communities	+	The development of c.8-12 dwellings will help to support the vitality and vibrancy of Steep village and there will be some on site affordable housing provision.
Accessibility	+	The site is accessible to existing village facilities and amenities, including the primary school, village hall, the two pubs and sports/recreational facilities. The site is also, due to its relative proximity to Petersfield (c.2.5km), accessible to the range of services, facilities and amenities located in this nearby town and the railway station. However, bus links between the two settlements are limited to a twice weekly service.
Sustainable Transport	-	The site is located 2.5km from Petersfield railway station. Bus links between Petersfield and Steep are limited to a twice weekly service.
Housing	+	The delivery of approximately 8-12 dwellings on this site would help contribute towards meeting local demand for housing.
Climate Change Mitigation	-	The development of approximately 8-12 dwellings at this location will lead to increases in the built footprint of Steep- however, given the amount of housing proposed for this site it is not anticipated that associated effects on greenhouse gas emissions will be significant.
Local Economy	+	Through increasing local housing stock, the delivery of housing at this site has the potential to support the village's vitality.

Summary of appraisal:

Summary: Policy SD93: Land South of Church Road, Steep

Whilst the site is sensitive in landscape terms, impacts from the site allocation on landscape character will be limited by the relatively small size of the allocation and the policy's aim to limit impacts on landscape character.

Potential effects on biodiversity are likely to be limited by the relatively small size of the allocation and the policy approaches initiated for the site allocation. Similarly the proximity of the site to areas of historic environment interest is reflected by the proposed policy.

The development of c.8-12 dwellings will support the vitality and vibrancy of Steep through supporting services, facilities and amenities. The site is in relative proximity to Petersfield, with its range of services and facilities. However public transport links are poor to the town, so the site allocation would lead to a degree of car dependence.

Potential significant effects?

None identified.

Recommendations

None proposed.

Key

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

Policy SD94: Land at Ramsdean Road, Stroud



Number of dwellings allocated: c.26-30

Approximate size of site: c. 1.4ha

Sustainability Theme	Rating	Commentary
Landscape	?	<p>The site comprises a field within a mosaic of fields, woodland and hedgerows on the settlement edge. Established by the landscape character assessment as of medium sensitivity, the site is in a prominent location within the settlement.</p> <p>The policy for the site allocation seeks to ensure that development provides a suitable transition in form and fabric from the existing residential areas to the west and the open countryside to the west and south, retain mature trees and hedgerows, and initiate a Arboricultural Impact Assessment, Arboricultural Method Statement and associated Tree Protection Plan, as well as a Landscape Visual Impact Assessment.</p>
Climate Change Adaptation		<p>The site is not located within an area at risk of fluvial or groundwater flooding. The northern edge of the site adjacent is prone to surface water flooding. This is reflected through the policy which seeks to minimise hard surfaced areas on site, and use permeable surfaces and soft landscaping where possible to maximise infiltration of water and reduce surface water run-off.</p>
Biodiversity	+	<p>The site is not located within an SSSI Impact Risk Zone and no BAP Priority Habitats are present in the vicinity of the site. The site is adjacent to an existing watercourse.</p> <p>Trees are present on and adjacent to the northern and eastern boundaries of the site. These are recognised by the policy, which seeks to retain mature trees and hedgerows and facilitate additional planting. The policy also seeks to facilitate new planting for pollinating species.</p>
Cultural Heritage	?	<p>The site is of archaeological potential and is located in a wider area noted for high archaeological interest. This archaeological potential is reflected by the presence of the Roman villa at Stroud scheduled monument, which is located approximately 150m to the east of the site. The policy seeks to ensure an archaeological assessment is undertaken and a heritage statement prepared to support new development proposals.</p>

Agenda Item 12 Report NPA14/17 Appendix 3

SA Report to accompany
Pre-Submission consultation: Appendices

Cultural Activity		No significant effects are anticipated.
Health and Wellbeing		No significant effects are anticipated.
Vitality of Communities	+	The development of c.26-30 dwellings will help to support the vitality and vibrancy of Stroud village and there will be some on site affordable housing provision.
Accessibility	+	The site is accessible to existing village facilities and amenities, including the nearby primary school, pub and sports/recreational facilities. The site is also, due to its relative proximity to Petersfield (c.2.6km), accessible to the range of services, facilities and amenities located in this nearby town 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 c.2.5km from Petersfield railway station.
Housing	+	The delivery of approximately 26-30 dwellings on this site would help contribute towards meeting local demand for housing.
Climate Change Mitigation	-	The development of approximately 26-30 dwellings at this location will lead to increases in the built footprint of Stroud- however, given the amount of housing proposed for this site it is not anticipated that associated effects on greenhouse gas emissions will be significant.
Local Economy	+	Through increasing local housing stock, the delivery of housing at this site has the potential to support the village's vitality.

Summary of appraisal:

Summary: Policy SD94: Land at Ramsdean Road, Stroud

Potential effects on the local archaeological resource will be limited by the proposed policy, which seeks to ensure an archaeological assessment is undertaken and a heritage statement prepared to support new development proposals. Similarly, potential impacts on landscape will be limited through the policy approach for the site allocation.

The development of 26-30 dwellings at the site will help meet local housing needs and support the vitality of the local area. The site is also accessible to Petersfield's amenities.

Potential significant effects?

None identified.

Recommendations

None proposed.

Key

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

Policy SD95: Land South of Heather Close, West Ashling



Number of dwellings allocated: c.18-20

Approximate size of site: c. 0.7ha

Sustainability Theme	Rating	Commentary
Landscape	?	<p>The site is visually well contained, interfacing with built form on Portal Close (to the east) and Heather Close (to the north), and a tree-belt (to the west). The site slopes gently away from the settlement towards densely tree-lined fieldscapes to the south.</p> <p>The site is low sensitivity due to the modest size of the site positioned as a logical extension to the settlement. The site is visible from the cutway between Portal Close and Heather Close and visible from the road to the south east. This is recognised by the policy, which seeks to ensure site boundaries are compatible with the open character of adjacent countryside.</p>
Climate Change Adaptation		The site is not located within an area at risk of fluvial, surface water or groundwater flooding.
Biodiversity	?	<p>The site is located under 2km from the Solent Maritime SAC and Chichester and Langstone Harbours SPA. The SPA is covered by the Chichester Harbour 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>'Provide suitable mitigation towards the Solent Special Protection Area (SPA)'</i>.</p> <p>The site is not located adjacent to areas of BAP Priority Habitat. The site contains a number of hedgerows and tree belts. This is recognised by the policy, which seeks to retain, protect and enhance trees on the site and key habitats retained and enhanced..</p>
Cultural Heritage		The site is outside of the West Ashling Conservation Area and is not located in close proximity to listed buildings. Development of this type is unlikely to lead to impacts on the integrity of the conservation area or the setting of these listed buildings.
Cultural Activity		No significant effects are anticipated.
Health and Wellbeing		No significant effects are anticipated.

Agenda Item 12 Report NPA14/17 Appendix 3

SA Report to accompany
Pre-Submission consultation: Appendices

Vitality of Communities	+	The development of c.8-12 dwellings will help to support the vitality and vibrancy of West Ashling village and there will be some on site affordable housing provision.
Accessibility	+	The site is accessible to existing village facilities and amenities, including Funtington Primary School, the village hall, shop, pubs and sports/recreational facilities. A wider range of services are available in Chichester, 7.5km from the site, as well as 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 7.5km from Chichester railway station.
Housing	+	The delivery of approximately 8-12 dwellings on this site would help contribute towards meeting local demand for housing.
Climate Change Mitigation	-	The development of approximately 8-12 dwellings at this location will lead to increases in the built footprint of West Ashling - however, given the amount of housing proposed for this site it is not anticipated that associated effects on greenhouse gas emissions will be significant.
Local 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 within a Mineral Safeguarding Area for unconsolidated gravel, which is acknowledged through the policy.

Summary of appraisal:

Summary: Policy SD95: Land South of Heather Close, West Ashling

The site is located under 2km from the Solent Maritime SAC and Chichester and Langstone Harbours SPA. The SPA is covered by the Chichester Harbour SSSI and is situated within an SSSI Impact Risk Zone for the types of development proposed. These constraints are acknowledged by the policy

The site is not located within an area sensitive for landscape character or historic environment interest.

The development of 8-12 dwellings at the site will help meet local housing needs and support the vitality of the local area.

The site is located in a Mineral Safeguarding 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.

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

Policy SD96: Land at Long Priors, West Meon



Number of dwellings allocated: c.10-12

Approximate size of site: c.0.5 ha

Sustainability Theme	Rating	Commentary
Landscape	?	Landscape sensitivity at this location has been determined to be medium. The location of the site reduces the visibility of the site affecting adjacent housing. To help limit potential effects, the proposed policy notes that a Landscape and Visual Impact Assessment will be required and should inform the design and layout of any site proposals. It is also made clear that any future development at this location should retain existing mature trees and give careful consideration to be given to the boundary treatment of the site. Whilst this will support landscape quality, residual effects on character are likely to remain.
Climate Change Adaptation		The site is covered by a Groundwater Source Protection Zone 2. Therefore, the proposed policy makes clear that no harm should be caused to groundwater as a result of any future development here. The site is not located within an area at risk of fluvial or groundwater flooding. There are some areas at risk of surface water flooding. This is recognised by the policy, which seeks to ensure the integration of flood risk mitigation measures within new development.
Biodiversity		This site does not fall within an SSSI Impact Risk Zone for the types of development proposed and no biodiversity designations are located in the vicinity of the site. An area of Lowland Calcareous Grassland BAP Priority Habitat is present to approximately 80m from the west of the site, on the far side of the properties located on Long Priors. The proposed policy calls for mature trees on the site to be retained. As such no significant effects on biodiversity are anticipated.
Cultural Heritage		No designated cultural heritage sites or areas designated for their historic environmental value are located in the vicinity of the site.
Cultural Activity		No significant effects are anticipated.
Health and Wellbeing		No significant effects are anticipated.
Vitality of Communities	+	The creation of 10-12 new homes will help to support the vitality and vibrancy of West Meon village and there will be some on site affordable housing provision.

Accessibility	?	The site has good accessibility to services and facilities in the village, including the post office, butchers, doctors' surgery and pub. A 2 hourly bus service connects West Meon with Petersfield and Winchester, where a broader range of amenities are available.
Sustainable Transport	?	<p>Whilst the site has good accessibility to services and facilities in the village, including the post office, butchers, doctors' surgery and pub, accessibility by sustainable transport to the broader range of amenities in Petersfield and Winchester are limited by a 2 hourly bus.</p> <p>The proposed policy also notes that a Transport Statement may be required to support any planning application for this site and that appropriate access arrangements are to be agreed with, and to the satisfaction of, the highway authority. The amenity of an adjacent public right of way must also be protected.</p>
Housing	+	The development of around six additional dwellings on this site would contribute positively to the meeting of local need for housing.
Climate Change Mitigation	-	The difficulty of travelling to Winchester and Petersfield by bus and the generally rural nature of West Meon has the potential to result in an increase in private car use with resulting negative effects in terms of CO ₂ emissions. However, given the amount of housing proposed for this site it is not anticipated that these effects will be significant.
Local 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 SD96: Land at Long Priors, West Meon

Groundwater sensitivity is a consideration for this site given its location in Source Protection Zone 2, and as such, potential negative effects will need to be identified and appropriately mitigated. This issue is addressed by the proposed policy which notes that development on this site should result in no harm to the underlying groundwater.

It will be also be important to consider how any future development here might affect the landscape character of West Meon and the surrounding area. In this context the policy states that a Landscape and Visual Impact Assessment should take place and mature trees should be retained. There may be opportunities for biodiversity and climate adaptation benefits to be secured through such landscape work.

Accessibility to the existing range of services and facilities in West Meon is good. However, accessibility by public transport to Petersfield and Winchester is limited by a two hourly bus service.

Potential significant effects?

None anticipated.

Recommendations

None proposed.

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

