

# Sustainability Appraisal for the South Downs Local Plan

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

## **Non-technical Summary**

September 2017

## Quality information

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## Revision History

Revision	Revision date	Details	Authorized	Name	Position
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## 1. What is sustainability appraisal?

The South Downs National Park Authority (SDNPA) is currently preparing a new Local Plan. A sustainability appraisal (SA) has been undertaken to inform the development of the Local Plan.

SA is a process that Local Planning Authorities such as the SDNPA are legally bound to undertake for their Local Plans. The SA has incorporated a strategic environmental assessment (SEA) process as required by the SEA Regulations. Local Planning Authorities use SA to assess Local Plans against a set of sustainability objectives and the baseline developed in consultation with interested parties. The purpose of the appraisal is to help identify (and so be in a better position to avoid) negative environmental and socio-economic effects and identify opportunities to improve the environmental quality of the National Park and the prosperity and quality of life of its residents through the Local Plan.

## 2. Details of the South Downs 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 statutory purposes and duty for national parks as specified in the Environment Act 1995, the National Planning Policy Framework (2012) and the Vision and Circular on English National Parks and the Broads (2010). The plan is being prepared at the same time as 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 for Communities and Local Government in March 2018 and then undergo an independent Examination in Public overseen by a Planning Inspector appointed by the Secretary of State.

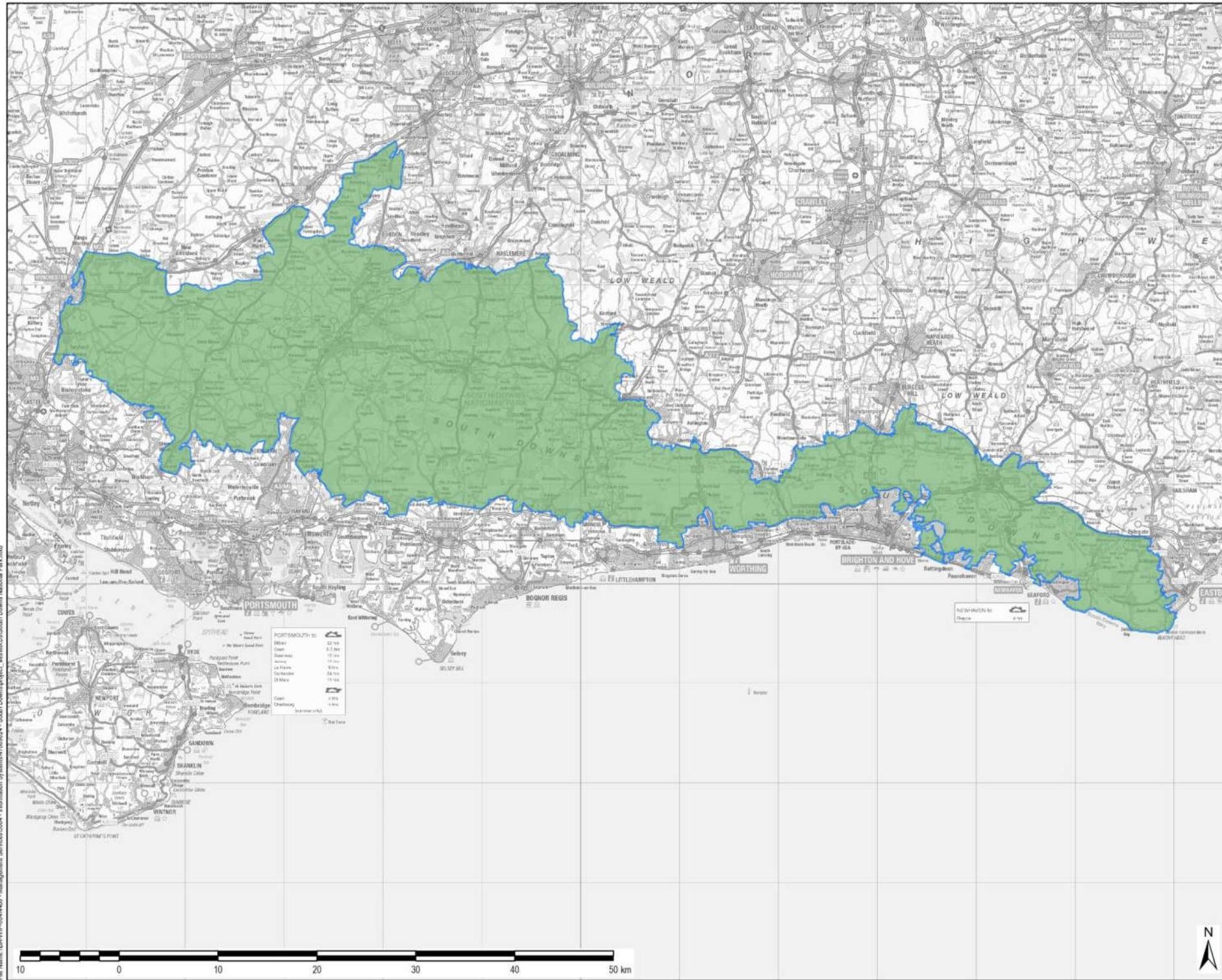
**Table 2.1: Key facts relating to the South Downs Local Plan**

<b>Name of Responsible Authority</b>	South Downs National Park Authority
<b>Title of Plan</b>	South Downs Local Plan
<b>Subject</b>	Spatial plan
<b>Purpose</b>	<p>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.</p> <p>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<sup>1</sup> for the National Park and the planning documents of the surrounding local authorities in accordance with the statutory Duty to Cooperate.</p>
<b>Timescale</b>	2014-2033
<b>Area covered by the plan</b>	South Downs National Park (see Figure 1.1).
<b>Summary of content</b>	<p>The South Downs Local Plan will establish the key planning policies for the National Park. These include core, strategic, 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>
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<sup>1</sup> SDNPA (2013) Partnership Management Plan 2014-2019

**LEGEND**

- South Downs
- National Park



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Purpose of Issue **DRAFT**

Client **SOUTH DOWNS NATIONAL PARK AUTHORITY**

Project Title **SUSTAINABILITY APPRAISAL OF THE SOUTH DOWNS LOCAL PLAN**

Drawing Title **SOUTH DOWNS NATIONAL PARK**

Drawn	Checked	Approved	Date
SJ	BB	NC	29/07/2015
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Drawing Number **FIGURE 1.1**

### 3. Purpose of the SA Report

The SA Report, which accompanies the current consultation on the Pre-Submission version of the South Downs Local Plan, is the fourth document to be produced as part of the SA process.

The first document was the SA Scoping Report (autumn 2013), which included information about the South Downs's environment and community, and the approach to the SA process, including the SA Framework of objectives against which the Local Plan has been assessed. The second document was the Options SA Report to accompany the Options Consultation Document for the Local Plan (February 2014). The third document was the SA Report to accompany the Local Plan Preferred Options (August 2015). All three documents can be accessed at the National Park Authority's website at:

<https://www.southdowns.gov.uk/planning/national-park-local-plan/>

The purpose of the current SA Report is to:

- Identify, describe and evaluate the likely significant effects of the Pre-Submission version of the Local Plan and any reasonable alternatives; and
- Provide an opportunity for statutory consultees, interested parties and the public to offer views on any aspect of the SA process.

The SA Report contains the following elements:

- An outline of the contents and main objectives of the Local Plan and its relationship with other relevant policies, plans and programmes;
- A description of the current state of the environment and key sustainability issues;
- The SA Framework of objectives and appraisal questions against which the Local Plan document has been assessed;
- The appraisal of alternative approaches for certain Local Plan topics;
- The likely significant effects of the Local Plan;
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the Local Plan;
- A proposed monitoring programme for the SA; and
- The next steps for the Local Plan and the accompanying SA process.

### 4. Appraisal of reasonable alternatives for the Local Plan

A key requirement of the SEA Regulations is to appraise 'reasonable alternatives' for the Local Plan. To address this requirement, a number of alternative approaches have been considered in relation to the scale, location and distribution of new development to be taken forward through the Local Plan. Alternative policy approaches for key topics have also been considered.

The options considered as reasonable alternatives, and the choice of the preferred strategy taking into account the findings of the appraisal, are presented below. Detailed appraisal findings are presented in the main body of the SA Report.

#### 4.1 Appraisal of reasonable alternatives for policy approaches

In February 2014, a Local Plan *Options Consultation Document* 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 approaches that the Local Plan policies could take on various key planning issues. The *Options Consultation Document* was

accompanied by an *Options SA Report* which was produced with the intention of informing this early stage of preparation of the Local Plan.

The *Options Consultation Document* presented a discussion of 55 'issues' for focus at that stage in plan development. These were discussed under eight themes. For each of these issues, the *Options Consultation Document* proposed various broad alternative approaches for consideration and discussion. In this respect the aim of the options consultation was to gain stakeholders' views on different approaches that Local Plan 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 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 Local Plan.

The *Local Plan: Preferred Options* was published in 2015 and was accompanied by an SA report. The SA appraised the reasonable alternatives for development strategies and explained why the preferred development strategy had been chosen. It also appraised all the policies in the Preferred Options document.

## 4.2 Appraisal of reasonable alternatives for development strategies

A key element of the Local Plan's development process to date has been to consider different approaches to delivering housing in the South Downs National Park. This work has drawn on the main studies on housing need in the National Park namely the Strategic Housing Market Assessment (SHMA) (2015) and the Housing and Economic Development Needs Assessment (HEDNA) (2017). This has been considered in the context of enabling the National Park Authority to address local housing need as far as possible whilst also: 1) meeting the Purposes of the National Park and 2) conserving and enhancing the special qualities of the National Park.

To help support this process, the SA has considered a number of development strategy options as reasonable alternatives. Five development strategy options were considered in detail, which presented different approaches to delivering housing in the National Park and are set out in table 4.1.

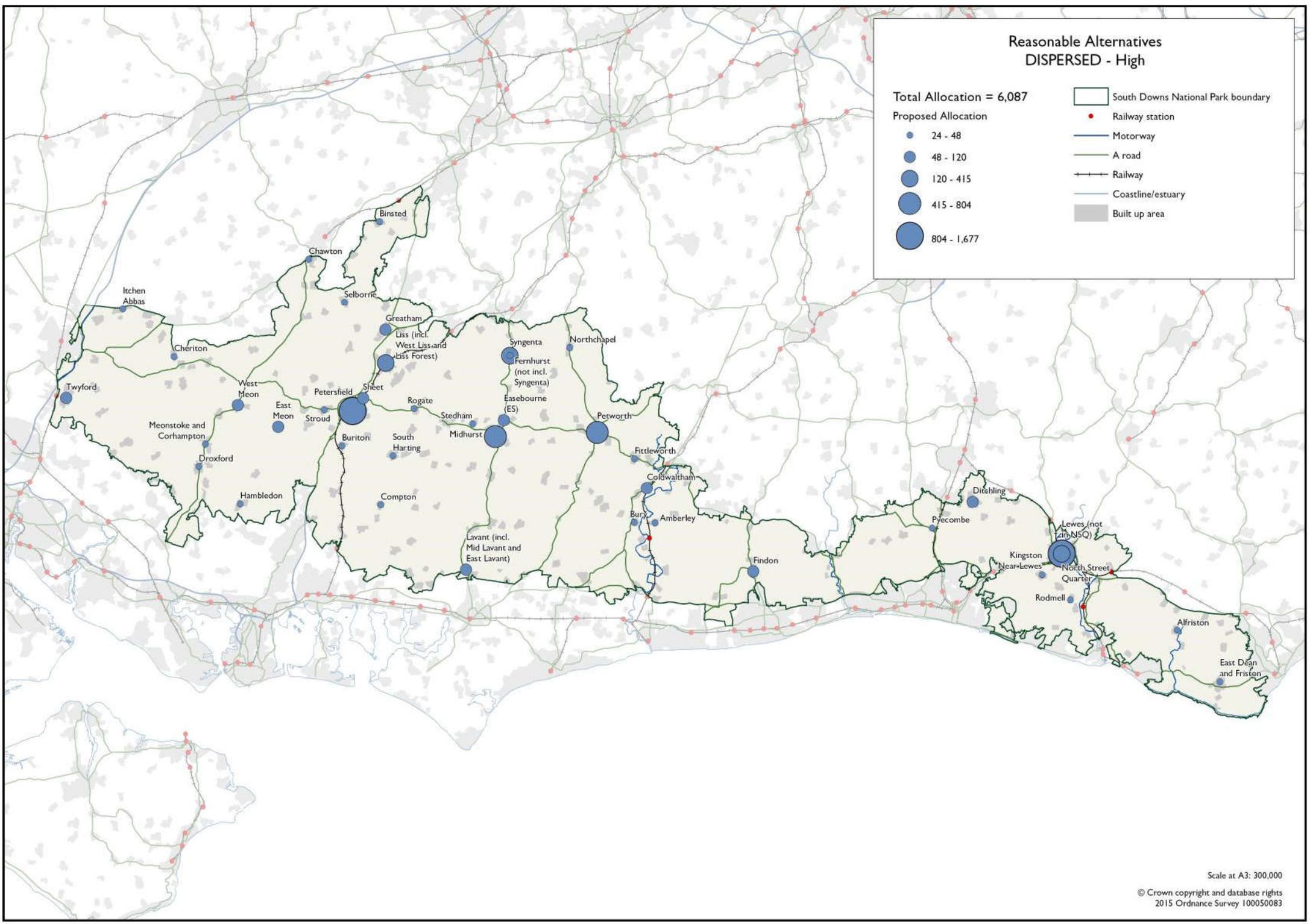
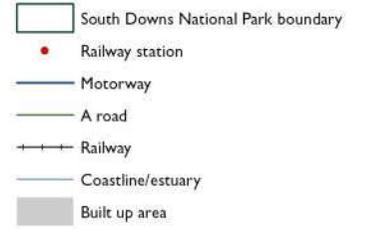
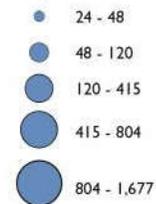
**Table 4.1: Alternative development strategies considered for the Local Plan**

<b>Dispersed High</b>	450 homes per annum	<p>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 Strategic Housing Market Assessment.</p> <p>Under this scenario, the level of housing proposed would be dispersed among the settlements of the National Park, including both larger and smaller settlements.</p>
<b>Dispersed Medium +60%</b>	302 homes per annum	<p>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.</p> <p>Under this scenario, this level of housing proposed would be dispersed among the settlements of the National Park, including both larger and smaller settlements.</p>
<b>Concentrated Medium</b>	255 homes per annum	<p>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.</p> <p>Under this scenario, this level of housing proposed would be concentrated in the larger settlements of the National Park, namely Petersfield, Lewes, Midhurst, Petworth and Liss.</p>
<b>Dispersed Medium</b>	255 homes per annum	<p>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.</p> <p>Under this scenario, this level of housing proposed would be dispersed among the settlements of the National Park, including both larger and smaller settlements.</p>
<b>Dispersed Medium (Sustainable Transport)</b>	255 homes per annum	<p>This scenario would also deliver 255 homes per annum. It would seek to locate new development in areas with established sustainable transport infrastructure, specifically well-established bus routes, rail and cycle routes suitable for commuting.</p>

## Reasonable Alternatives DISPERSED - High

Total Allocation = 6,087

Proposed Allocation



Scale at A3: 300,000

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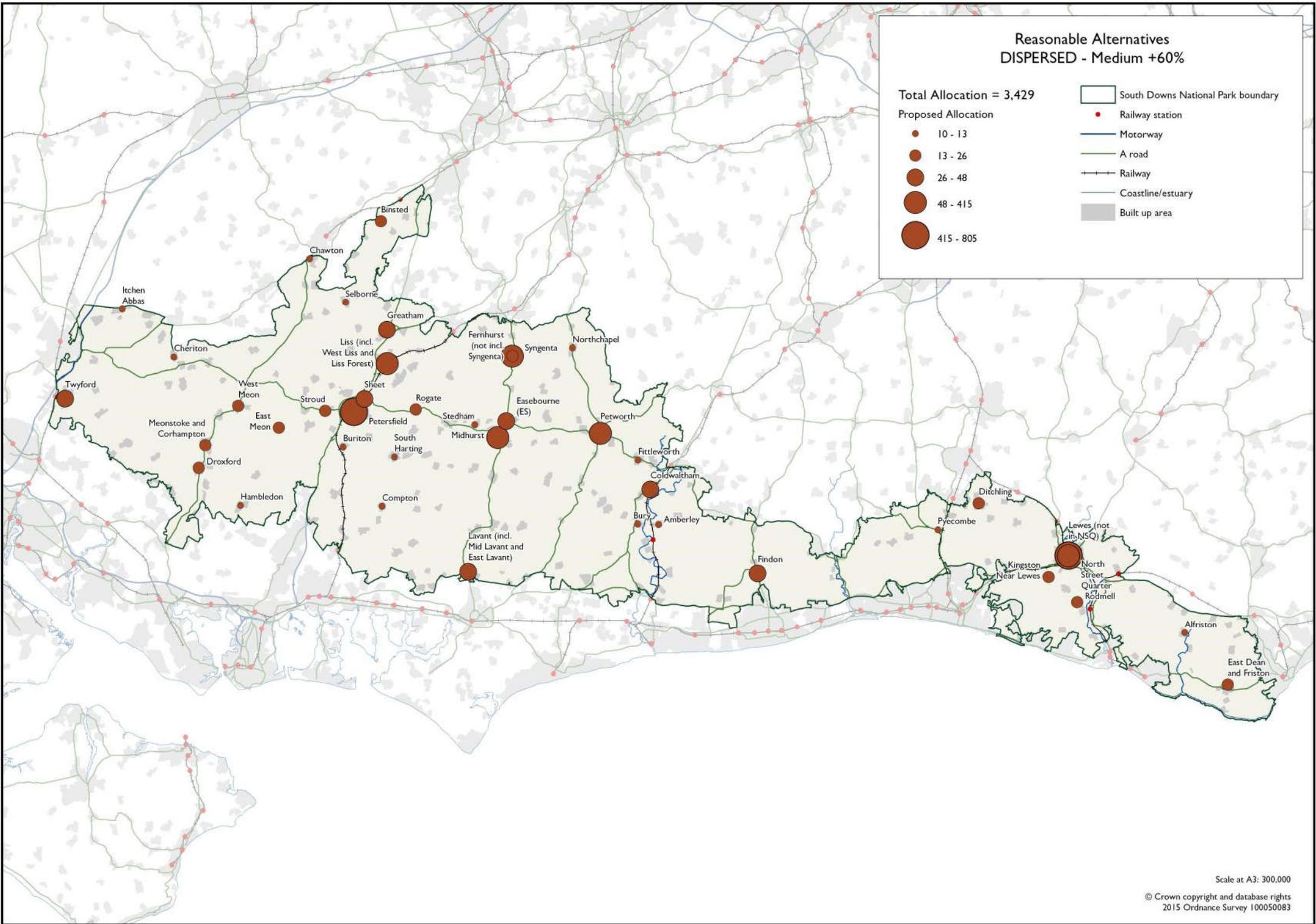
Reasonable Alternatives  
DISPERSED - Medium +60%

Total Allocation = 3,429

Proposed Allocation

- 10 - 13
- 13 - 26
- 26 - 48
- 48 - 415
- 415 - 805

- South Downs National Park boundary
- Railway station
- Motorway
- A road
- +— Railway
- Coastline/estuary
- Built up area



Scale at A3: 300,000

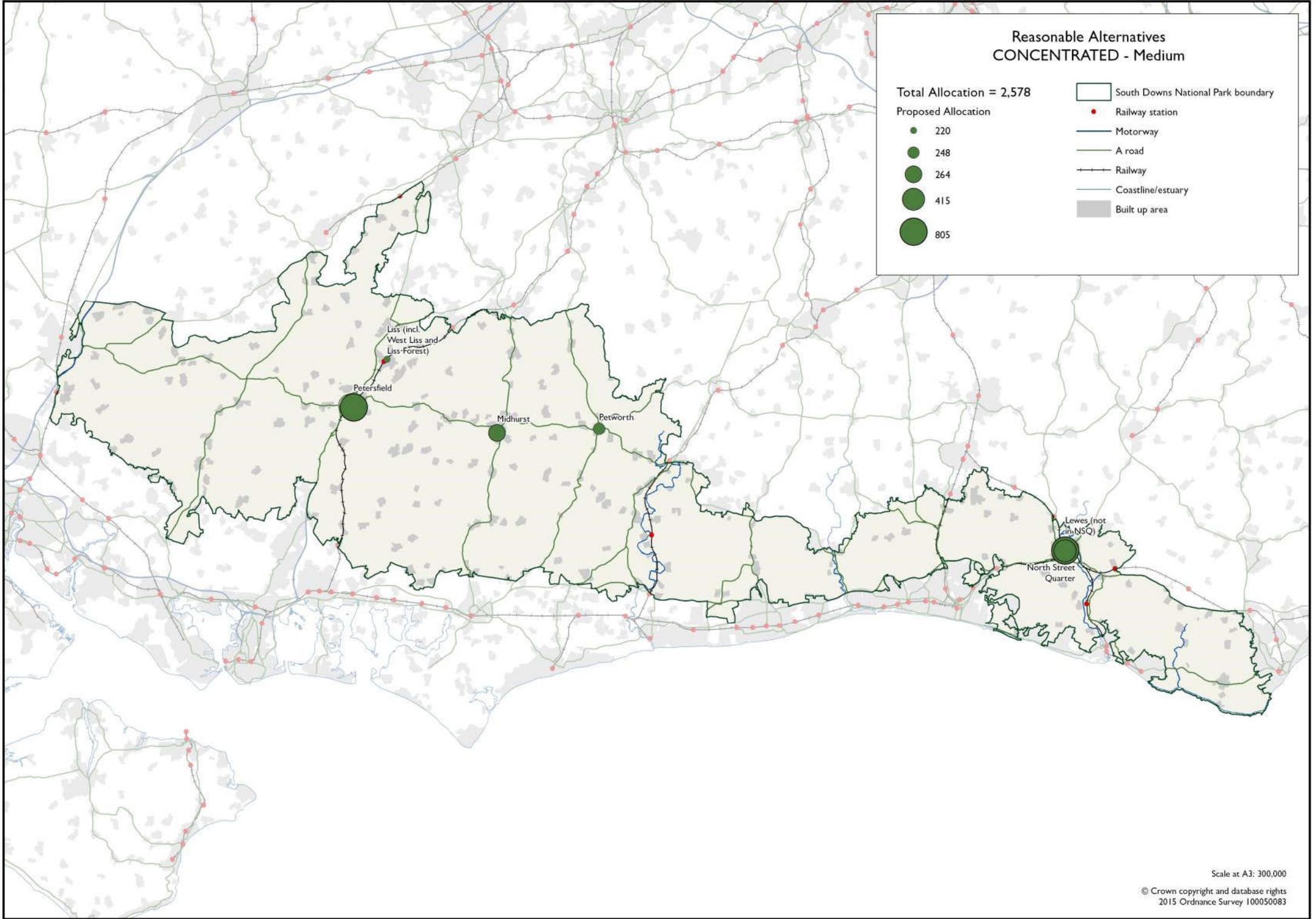
Reasonable Alternatives  
CONCENTRATED - Medium

Total Allocation = 2,578

Proposed Allocation

- 220
- 248
- 264
- 415
- 805

- South Downs National Park boundary
- Railway station
- Motorway
- A road
- Railway
- Coastline/estuary
- Built up area

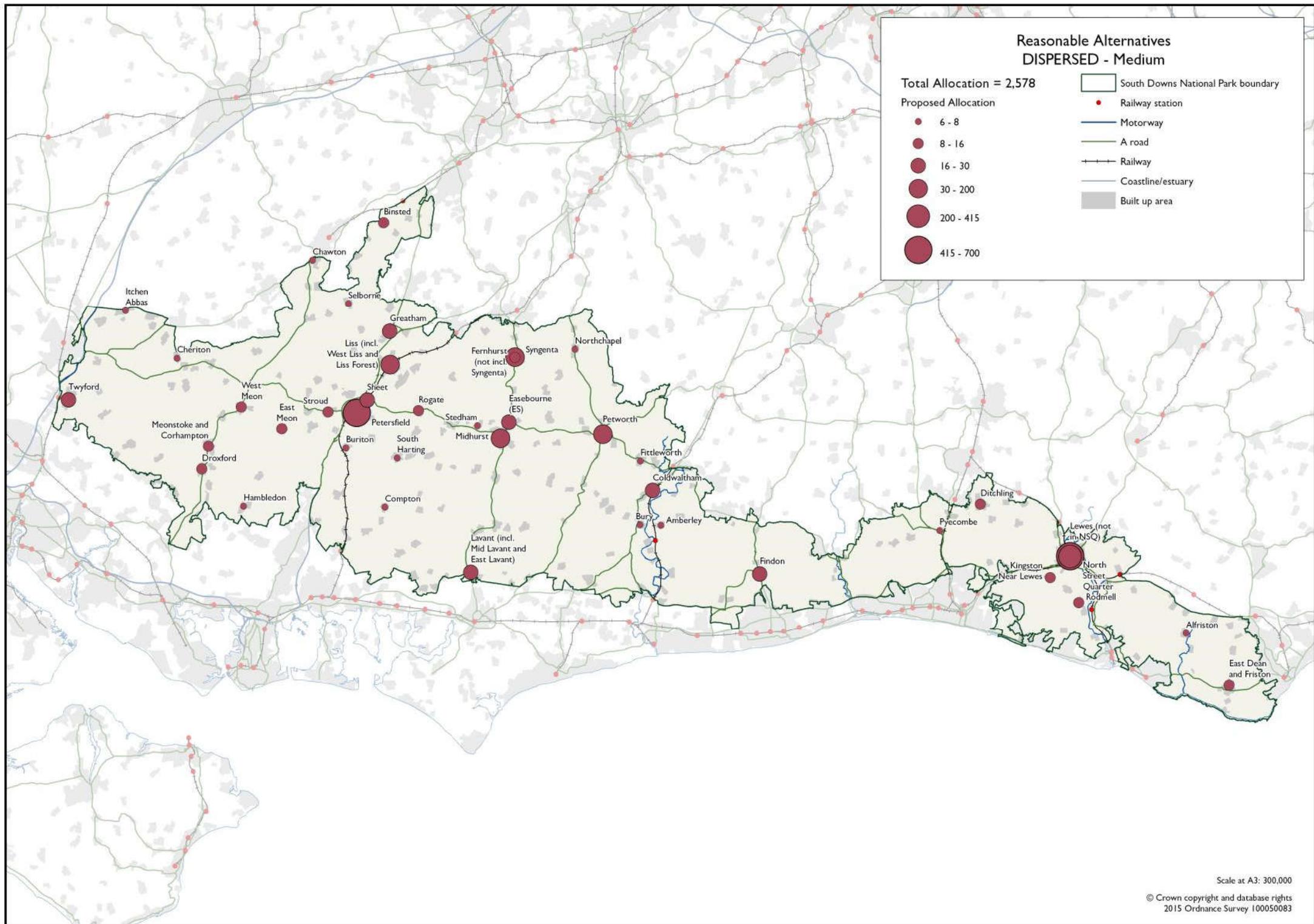
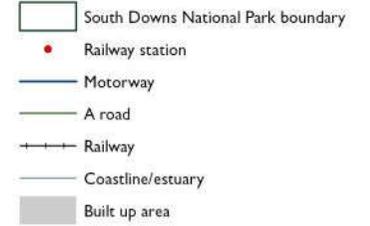
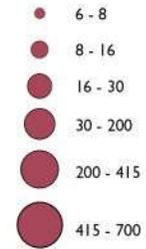


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### Reasonable Alternatives DISPERSED - Medium

Total Allocation = 2,578

Proposed Allocation



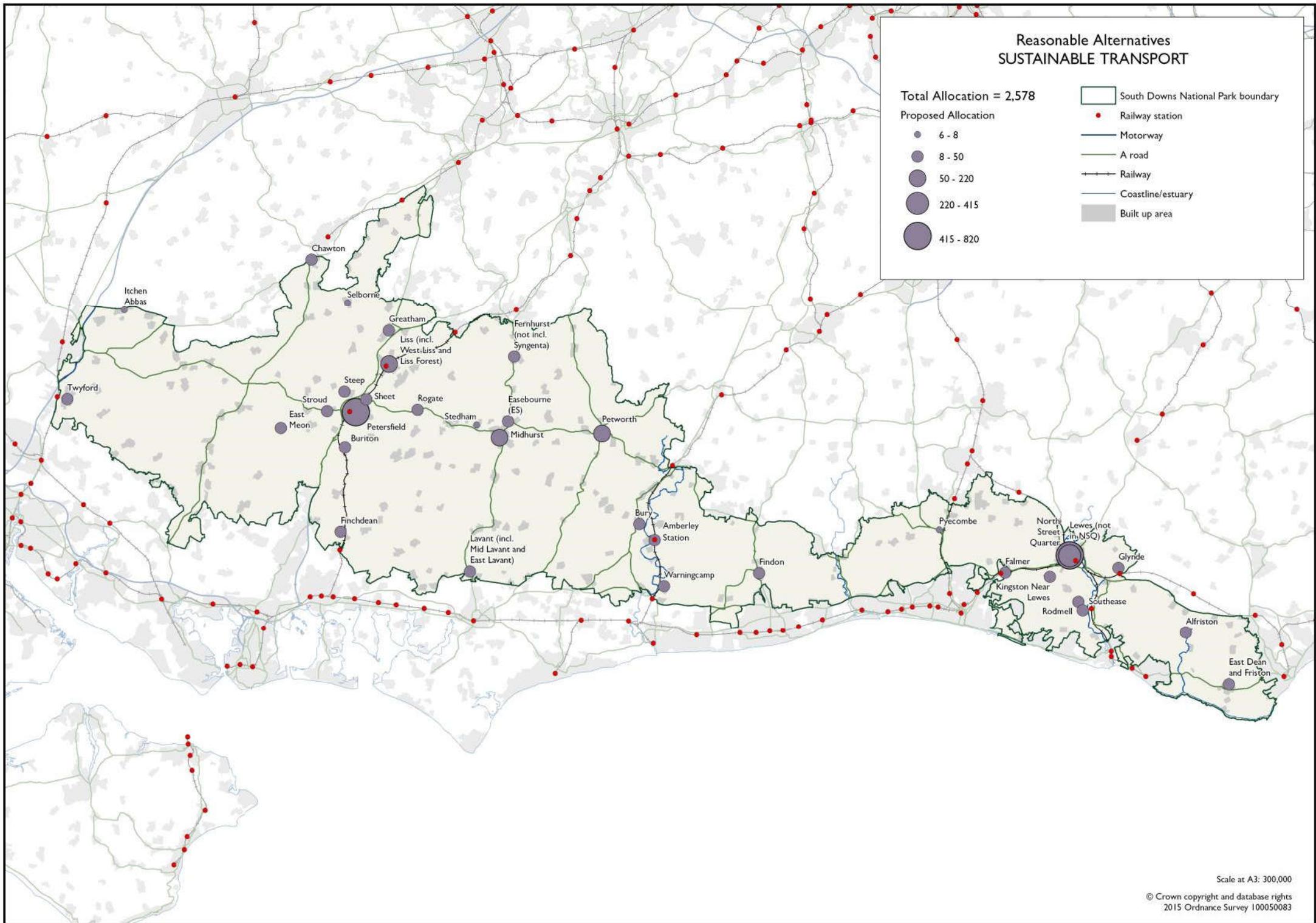
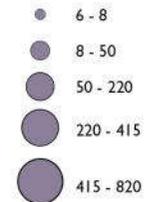
Scale at A3: 300,000

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## Reasonable Alternatives SUSTAINABLE TRANSPORT

Total Allocation = 2,578

Proposed Allocation



Scale at A3: 300,000

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Section 3.2.2 of the SA Report presents the comparative effects of the five options above, identifying where significant positive and negative effects have the potential to arise. The appraisal findings are presented under twelve sustainability themes, as follows:

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

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 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, will do most to meet objectively assessed and affordable 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.

### 4.2.1 Why has the preferred development strategy been chosen?

The SDNPA has considered that, based upon landscape sensitivity assessment from the most recent Strategic Housing Land Availability Assessment (SHLAA) published in December 2016, it has become apparent that the Dispersed High option cannot be delivered without significant impact upon the landscape character of 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 highly sensitive sites beyond the settlement boundary. The latter category includes sites that serve as green fingers within towns and villages 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 limit 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 and townscape impact. This might constitute extensions 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 / infrastructure 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 assessed<sup>2</sup> 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 provide 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 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.

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<sup>2</sup> 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.

The preferred option is the Dispersed Medium option. The proposed allocations included in the Local Plan will assist in delivering the evidence-based housing provision 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 some cases the distribution of housing in the Pre-Submission Local Plan departs slightly from the hypothetical figures tested through the Dispersed Medium option. The settlements, and the reasons for the departure from the housing numbers considered, are presented in section 3.2.5 of the SA Report.

### 4.3 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 Strategic Housing Land Availability Assessment (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 central consideration in the assessment of suitable development sites through the SHLAA process.

Table 4.2 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 4.2: Key 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.

In addition to landscape considerations, there were two further main reasons for the sites not being allocated in the Local Plan. These are as follows:

- when a site had previously been included in the Preferred Options for the Local Plan, but then taken out because a preferable site for the settlement has since been identified; and or
- 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 led to 41 sites being allocated in the Pre-Submission consultation version of the Local Plan as housing, employment or mixed use sites. Section 3.26 of the SA Report describes this process in more detail in conjunction with the site appraisals undertaken through the SA process.

## 4.4 Appraisal of further options as reasonable alternatives

### 4.4.1 Appraisal of options for Shoreham Cement Works

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.

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 four options were considered for the site through the SA process, linked to different uses for the site relating to Land Use Classes<sup>3</sup>. 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 findings of the appraisal are presented in section 3.3 of the SA Report.

### 4.4.2 Appraisal of alternative approaches for 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 housing needs assessment that 294 affordable dwellings a year are required in the National Park, the SDNPA were 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

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<sup>3</sup> 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](https://www.planningportal.co.uk/info/200130/common_projects/9/change_of_use)

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

Section 3.4 of the SA Report presents appraisal findings in relation to the two options considered above.

## 5. Development of planning policies for the 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 consultation<sup>4</sup>. At this stage, the SA Report set out a number of recommendations designed to enhance the sustainability performance of the Local Plan policies.

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 current version of the Local Plan presents 96 policies, including core policies, strategic policies, development management policies and allocation policies.

## 6. Appraisal of the current version of the Local Plan

### 6.1 Appraisal of Local Plan policies

The SA Report presents an appraisal of the current version of the Local Plan. As such, the policies presented in the current Pre-Submission version of the Local Plan have been appraised in Part 2 of the SA Report.

In terms of the strategic site allocation and site allocation policies, allocations at a number of the sites have the potential to lead to significant effects. These are summarised 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

<sup>4</sup> 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](https://www.southdowns.gov.uk/wp-content/uploads/2015/09/SDLP_PO_SA-Report_v-7-0_260815.pdf)

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.

**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.

The following overview presents a summary of the appraisal findings relating to the core, strategic and development management policies presented in the Pre-Submission version of the Local Plan.

**Table 6.1: Potential significant effects resulting from the core, strategic and development management policies presented in the Pre-Submission version of the Local Plan**

<i>Likely significant effect</i>	<i>Effect dimensions</i>
<b>Landscape</b>	
Whilst the Local Plan sets out a range of policies which will protect and enhance landscape character, effects are unlikely to be significant given the protection provided by the existing provisions of the National Park designation.	
<b>Climate Change adaptation</b>	
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
<b>Biodiversity</b>	
Improved ecological connectivity	Direct and indirect, long-term, permanent and positive.

<b>Likely significant effect</b>	<b>Effect dimensions</b>
Improved ecological resilience	Direct and indirect, long-term, permanent and positive.
'Wider' ecological benefits	Direct and indirect, long-term, permanent and positive.
Increased habitat and greenspace through GI and enhancing waterways	Direct and indirect, long-term, permanent and positive.
<b>Cultural heritage</b>	
Protection and enhancement of heritage assets, including repair and reuse where appropriate	Direct, long-term, permanent and positive.
Increased accessibility of heritage assets through safeguarding disused rail lines for future use	Direct, long-term, permanent and positive.
<b>Cultural activity</b>	
Enhancement of landscape character and other key attributes of the National Park will support tourism growth	Indirect, long-term, permanent and positive.
Increase in tourism through a well-planned approach, including provision of supporting infrastructure	Direct, long-term, permanent, positive and negative.
Support for cultural activity through protection of existing community facilities and provision of new facilities	Indirect, long-term, permanent, positive.
Increased accessibility of heritage assets through safeguarding canals and rail lines	Direct, long-term, permanent and positive.
<b>Health and wellbeing</b>	
Enhancements to strategic and local green infrastructure networks, helping to alleviate existing deficiencies outside of the National Park.	Indirect, long-term, permanent and positive.
<b>Vitality of communities</b>	
Enhance the vitality of communities by locating housing where it sustains balanced communities.	Direct, long-term, permanent and positive.
Enhance the vitality and vibrancy of town and village centres.	Direct, long-term, permanent and positive.
Enhance the vitality of communities by securing the delivery of community infrastructure.	Direct, long-term, permanent and positive.
Enhance the vitality of communities by securing supporting infrastructure as part of new development.	Direct, long-term, permanent and positive.
<b>Accessibility</b>	
Support for community facilities through enabling development in more accessible smaller settlements	Direct, long-term, permanent and positive.
Increased provision of community infrastructure.	Direct, long-term, permanent and positive.
Provision of improved accessibility to multi-functional open spaces.	Direct, long-term, permanent and positive.

<b>Likely significant effect</b>	<b>Effect dimensions</b>
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.
<b>Sustainable transport</b>	
Increase use of sustainable transport modes, including public transport and walking and cycling.	Direct, long-term, permanent and positive.
<b>Housing</b>	
Increased delivery of affordable housing, including in smaller settlements.	Direct, long-term, permanent and positive.
Provision of housing of a range of types and tenures to meet different needs	Direct, long-term, permanent and positive.
Provide for gypsy and traveller sites to contribute to meeting projected need.	Direct, long-term, permanent and positive.
<b>Climate change mitigation</b>	
Carbon sequestration and provision of woodfuel through extension of wood planting.	Direct, long-term, permanent and positive.
<b>Economy</b>	
Promotion of the visitor economy of the National Park	Direct, long-term, permanent and positive.
Promotion of the visitor economy of the National Park	Direct, long-term, permanent and positive.

## 6.2 Appraisal of cumulative effects and monitoring

In combination effects can also result from the combined impacts of a plan with impacts of another plan or initiative. 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.

Potential effects which may occur as a result of the in-combination effects of the Local Plan and other plans and proposals in the wider 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.
- 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 as 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.

It should also be noted that the policies put forward through the current version of the plan do not prevent the likelihood of negative effects taking place, including those highlighted in the SA Report for the proposed site allocations. Instead, they reduce the likelihood of significant negative effects resulting from new development proposals in the National Park. The delivery of housing allocations and employment provision will require inevitable trade-offs to take place between the various environmental, social and economic elements which have been highlighted through the SA process to date.

Therefore, in order to understand these trade-offs during the implementation of the Local Plan, the SA Report presents a monitoring programme to evaluate the ongoing effects of the plan (Chapter 6 of the SA Report).

## 7. Next steps

The SA Report accompanies the current consultation on the Pre-Submission version of the Local Plan.

Consultation will conclude in November 2017. The Local Plan document and accompanying information (including consultation responses and the SA Report) will subsequently be submitted by the National Park Authority to the Planning Inspectorate for Examination in early 2018.



