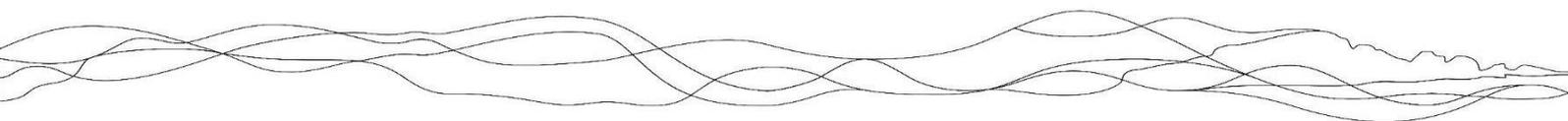




Sites and Settlements Background Paper

South Downs Local Plan

October 2017



I. INTRODUCTION

Policies covered:

- **Policies SD58 to SD96:** Housing, Gypsy & Traveller and Employment Sites Allocations

- 1.1** This background paper outlines the basis upon which Allocation Sites Policies SD58 to SD96 of the Pre-Submission South Downs Local Plan have been formulated. It summarises the process taken in identifying sites for allocation of new Housing, Gypsy and Traveller pitches and Employment sites. It explains the context behind why the policies are necessary to ensure that the purposes and duty of the National Park are met, and summarises both national policy and the key evidence base studies which have fed into the allocation policies.
- 1.2** This paper should be read alongside the Gypsy, Traveller and Travelling Showpeople, Housing and Employment background papers, which are published as part of the Local Plan evidence base.
- 1.3** The decision to include a site for allocation is based on professional judgement, relevant and evidential technical studies (“the evidence base”) and by consultation responses. All the proposed sites identified for allocation and their ‘reasonable alternatives’ are subject to Sustainability Appraisal and Strategic Environmental Assessment (combined). The process of allocation site selection, the Plan and the evidence base will be tested by the independent Government Inspector who will be appointed to examine the submission draft plan to ensure that it is both legally compliant and sound. All the allocations have been made in line with the spatial strategy for a medium level of development dispersed across the towns and villages of the National Park.

2. NATIONAL PARK PURPOSES AND SPECIAL QUALITIES

- 2.1** The purposes of National Parks are to conserve and enhance the natural beauty, wildlife and cultural heritage of the area and promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public. Working in partnership with other local authorities and organisations, national park authorities have a duty to seek to foster the economic and social well-being of communities within the national park in carrying out the purposes. As such, the provision of an appropriate quantum of market and affordable housing in the SDNP through suitable allocations in the Local Plan should support its future social and economic sustainability.

3. NATIONAL POLICY AND GUIDANCE

National Planning Policy Framework¹

- 3.1** The National Planning Policy Framework (NPPF) sets out (Paragraph 17) that allocations of land for development should prefer land of lesser environmental value, where consistent with other policies. Paragraph 54 sets out that in rural areas, local planning authorities (LPAs) should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing. Paragraph 55 sets out that to promote sustainable development in rural areas housing should be located where it will enhance or maintain the vitality of rural communities. Paragraphs 159 sets out the requirement for LPAs to have plans informed by suitable evidence studies and environmental assessments.
- 3.2** The NPPF (Paragraph 22) sets out, with regard to employment land, that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Paragraph 161 of the NPPF sets out that reviews of land available for economic development should be undertaken at the same time as, or combined with, Strategic Housing Land Availability Assessments and should include a reappraisal of the suitability of previously allocated land.
- 3.3** The NPPF (Paragraph 116) sets out that planning permission should be refused for major development in National Parks inter alia except in exceptional circumstances and where it can be demonstrated they are in the public interest².

Planning Policy for Traveller Sites (CLG, August 2015)³

- 3.4** The national Planning Policy for Traveller Sites (PPTS) sets out the Government's planning policy for traveller sites. Paragraph 3 sets out that the Government's overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates their traditional and nomadic way of life while respecting the interests of the settled community. Paragraph 9 sets out that local planning authorities should set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople, which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities.

Planning Practice Guidance

- 3.5** The Planning Practice Guidance (PPG) sets out how local authorities should support sustainable rural communities through recognising the particular issues facing rural areas in terms of housing

¹ National Planning Policy Framework (CLG, 2012)

² Legal opinion has been obtained on the definition of 'major development' in this context (see below) and on whether allocation of a major site in a Local Plan can only be made if the requirements of para. 116 are met. The conclusion of James Maurici QC on the latter point is 'that the matters in the bullet points in para. 116 would have to be addressed in the plan-making process.'

³ Planning Policy for Traveller Sites (CLG, 2015)

supply, affordability and the role of housing in supporting the broader sustainability of villages and smaller settlements. Allocating sites should be considered at a strategic level and through the Local Plan and/or neighbourhood plan process. All settlements can play a role in delivering sustainable development in rural areas.

English National Parks and the Broads: UK Government Vision and Circular 2010⁴

- 3.6** The purpose of the Vision and Circular is to provide policy guidance on national parks in England. The Vision and Circular sets out (Paragraphs 28, 76-79) that within the broader context of sustainable development, both housing, particularly affordable housing, and local employment is identified as a demand and need within National Parks.
- 3.7** National park authorities have a key role, as planning authorities, in the delivery of affordable housing. The lack of affordable housing in National Parks can have a detrimental effect on the local economy and undermine the social networks that are key components of sustainable rural communities. The expectation set out in the Circular (Paragraph 78) is that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services.
- 3.8** The Vision and Circular sets out (Paragraphs 68-75) that the authorities must ensure that, in their work furthering national park purposes, they give sufficient weight to socio-economic interests including providing employment. Authorities can play a catalytic role in maintaining thriving rural economies through fostering an appropriate planning regime encouraging new development to broaden the economic base and fostering more diverse and higher-value local employment opportunities.

4. LOCAL CONTEXT AND EVIDENCE

South Downs National Park Partnership Management Plan⁵

- 4.1** The Partnership Management Plan (PMP) is the overarching five-year strategy for the management of the South Downs National Park. The PMP has been prepared by the National Park Authority in close partnership with others following engagement and debate with stakeholders. The PMP provides a framework for the emerging park-wide Local Plan with the aim of delivering sustainable development through taking a landscape-led and ecosystem approach. The PMP identifies development pressures (p.18), which includes the provision of new housing, as a pressure for change:

“Communities will need appropriate and affordable housing development, and this needs to be managed in terms of overall numbers, location and quality of design. Individual small changes to landscapes, settlements or buildings in and outside the planning system, can add up incrementally over time, leading to negative impacts such as urbanisation and loss of landscape character.”

- 4.2** The PMP (p.27) sets out 11 outcomes which each describe how the vision is being achieved. Under the heading ‘Towards a Sustainable Future’ Outcome 9 states:

⁴ English National Parks and the Broads: UK government vision and circular 2010 (Defra, 2010)

⁵ South Downs Partnership Management Plan 2014-19 (SDNPA, 2015)

Communities and businesses in the National Park are more sustainable with an appropriate provision of housing to meet local needs and improved access to essential services and facilities.

- 4.3** As such, the PMP is clear that the delivery of appropriate new housing, particularly affordable housing, is a key delivery outcome.
- 4.4** The site assessment and selection process is informed by relevant appraisals, assessments and evidence studies which support the draft Local Plan. These include:-
- Strategic Housing Land Availability Assessment⁶
 - Assessment of Site Allocations against Major Development Considerations, (2015 and 2017)⁷
 - Sustainability Appraisal, (2017)⁸
 - Habitats Regulation Assessment (2017)⁹
 - Site Allocations Highways Assessment, (2017)¹⁰
 - Strategic Flood Risk Assessment, (2015¹¹ and 2017 Update¹²)
 - Employment Land Review (2015¹³ & 2017 Update¹⁴)
 - Gypsy, Traveller & Travelling Showpeople Accommodation Assessments, December 2012 to July 2016¹⁵
- 4.5** The Strategic Housing Market Assessment (SHMA)¹⁶ and subsequent Housing and Employment Development Needs Assessment (HEDNA)¹⁷ are also key pieces of evidence. These are addressed in the Development Strategy Background Paper.

Strategic Housing Land Availability Assessment

⁶ South Downs National Park Strategic Housing Land Availability Assessment (SDNPA, 2016)

⁷ South Downs Local Plan: Pre-submission – Assessment of Site Allocations against Major Development Considerations Technical Report (Envision, 2017)

⁸ Sustainability Appraisal for the South Downs Local Plan: SA Report to accompany the Pre-submission version of the Local Plan (Aecom, 2017)

⁹ South Downs National Park Authority Local Plan Pre-Submission (September 2017) Habitats Regulations Assessment (Aecom, 2017)

¹⁰ South Downs Local Plan Site Allocations Highway Assessment – Highway Assessment Report (Hampshire County Council, 2017)

¹¹ Water Cycle Study and SFRA Level 1 Scoping and Outline Report (Amec Environmental & Infrastructure UK Ltd, 2015)

¹² Level 1 Update and Level 2 Strategic Flood Risk Assessment (Amec Foster Wheeler, 2017)

¹³ South Downs National Park Employment Land Review (GL Hearne, 2015)

¹⁴ Employment Land Review 2017 Update (SDNPA, 2017)

¹⁵ See South Downs Local Plan evidence and supporting documents for all relevant assessments (www.southdowns.gov.uk/localplan)

¹⁶ Strategic Housing Market Assessment – South Downs National Park Authority (GL Hearne, 2015)

¹⁷ South Downs National Park HEDNA – South Downs National Park Authority (GL Hearne, 2017)

- 4.6** The Strategic Housing Land Availability Assessment (SHLAA) should be seen as the first stage in the search for housing allocation sites. The first SHLAA for the whole National Park was published in January 2015 and was updated in December 2016; it identified and assessed the availability, suitability and deliverability of land as a potential housing site. It sets out in summary form, the main technical and planning issues identified when considering potential housing allocation sites where five or more dwellings could realistically be delivered.
- 4.7** To be classed as developable in the SHLAA, sites must be suitable, available and achievable over the plan period. In addition to meeting the plan requirement through the allocation of developable sites and through windfalls (small sites which would be supported by the plan) the Authority has to identify a five year supply of ‘deliverable’ sites i.e. sites that can come forward within the next five years. This influences the site choices as large complex and heavily constrained sites may not come forward as quickly as unconstrained brown or ‘greenfield’ sites.
- 4.8** Where a SHLAA finds that there are more ‘developable’ sites than are needed to meet the identified requirement, then choices can be made about which sites best meet national policies and the draft Local Plan’s vision, objectives and development strategy¹⁸. The SHLAA identified more ‘developable sites’ than required and as such the SDNPA was required to determine from this palette of sites those most suitable for consideration as allocation sites, to conform with the emerging Local Plan policies (See Section 5 of this paper).

Assessment of Site Allocations against Major Development Considerations

- 4.9** Two assessments (October 2015 and August 2017) were undertaken to determine whether proposed allocations sites compromised ‘major’ development in line with the NPPF Paragraph 116 exceptional circumstances and public interest tests. The assessments identified the following proposed housing allocation sites as comprising major development:
- Land at Old Malling Farm, Lewes (SD79) 220/240 dwellings
 - Land south of London Road, Coldwaltham (SD64): 25/30 dwellings
 - Land at Petersfield Road, Greatham (SD73): 35/40 dwellings
 - West Sussex County Council Depot and former Brickworks site (SD81): 65/90 dwellings
 - Land at Pulens Lane, Sheet (SD89): 30/32 dwellings
 - Stedham Sawmill, Stedham (SD92): 16/20 dwellings and 3,000m² B1 use
 - Land at Ramsdean Road, Stroud (SD94): 26/30 dwellings

- 4.10** The 2017 assessment summarises (Paragraph 3.67):

The sites at Coldwaltham, Greatham, Stedham and Stroud are considered to be major development because of their scale in relation to the size of the villages and their lack of enclosure. All four sites also require a number of further assessments. The former brickworks and highway depot site in Midhurst, although PDL, is relatively large in scale, and has medium/high landscape sensitivity due to its proximity to Midhurst Common. The site at Sheet also has medium/high landscape sensitivity and is not enclosed. Both sites require a number of further assessments.

¹⁸ The national Planning Practice Guidance sets out a detailed summary of how sites are determined to be ‘developable’ or not Paragraphs: 001 to 043 Reference ID: 3-001-20140306

4.11 As such, each allocation deemed to comprise major development should also address the major development test in Local Plan Core Policy SD3 (see Paragraph 9.7 of the Regulation 19 Local Plan).

Sustainability Appraisal

4.12 Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA) are part of the site assessment process. A separate Sustainability Appraisal Report has been published in support of the Pre-Submission Local Plan. The SA looks at the proposed allocation sites and assesses the economic, social and environment effects against an agreed set of SA objectives. All sites which are identified as ‘reasonable alternatives’ are subject to an SA/SEA, in accordance with European and national legislation relating to the production of plans and programmes. The South Downs Local Plan SA took an approach such that sites identified as ‘developable’ in the SHLAA are considered to be reasonable alternatives.

4.13 This SA process thus informs the choices made. For example, this process may change some of the initial judgements made and/or refine the site specific requirements to mitigate identified adverse effects.

Habitats Regulations Assessment

4.14 Habitats Regulations Assessment of Local Plans is required by the Conservation of Habitats and Species Regulations in order to meet the requirements of the Habitats Directive. HRA screening assessment of the Local Plan is carried out in order to identify likely significant effects of European nature conservation sites (a European site), i.e. Special Protection Areas (SPAs) and Special Areas of Conservation (SAC).

4.15 The purpose of the screening is to:

- Identify all aspects of the plan which would have no effect on a European site, so that they can be eliminated from further consideration in respect of this and other plans;
- Identify all aspects of the plan which would not be likely to have a significant effect on a European site (i.e. would have some effect, because of links/connectivity, but which are not significant), either alone or in combination with other plans or projects, and which therefore do not require ‘appropriate assessment’¹⁹; and
- Identify those aspects of the plan where it is not possible to rule out the risk of significant effects on a European site, either alone or in combination with other plans or projects. This provides a clear scope for the parts of the plan that will require ‘appropriate assessment’.

4.16 Where proposed Local Plan site allocations are deemed to have likely significant effects on a European site, where appropriate, this will result in the allocation being deleted from the Local Plan or suitable mitigation being stipulated in the relevant policy.

Site Allocations Highways Assessment

4.17 A Highways Assessment was undertaken to identify whether a viable highway access to proposed housing and Gypsy & Traveller allocation sites within the Pre-Submission Local Plan could be achieved. No proposed allocation sites were found to have insurmountable vehicular

¹⁹ ‘Appropriate assessment’ is explained in the Biodiversity Background Paper, which is published as part of the Local Plan evidence base.

and pedestrian access issues. However, a number of allocation sites had particular constraints that would need to be addressed in development proposals (e.g. sightlines) and this is reflected in the respective policy.

Employment Land Review

4.18 The Employment Land Reviews (2015 & 2017) provide an important part of the evidence base to inform the preparation of the Local Plan by assessing economic development needs objectively in line with the NPPF and PPG. The ELR provides an understanding of the current and potential future requirements for employment land considering a range of scenarios. B1, B2 and B8 use classes are assessed in the studies.

4.19 The Employment Land Review (2017) forecasts have identified a need for around 10 hectares of employment land over the 2014-33 period, the demand for which is centred on the largest settlements in the National Park including Petersfield, Lewes and Midhurst.

Gypsy & Traveller Accommodation Assessments

4.20 Based on any need identified, Gypsy and Traveller pitch targets and Travelling Showpeople plot targets should be set. Local planning authorities should, in producing their Local Plan, identify an up-to-date supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets, and also identify a supply of specific, developable sites, or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan period.

4.21 In 2015, 'Planning Policy for Traveller Sites' was updated and the definition of Gypsies and Travellers for planning purposes changed to:

"Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependents' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such".

4.22 In light of this change, only those members of the Gypsy and Traveller community who still travel, or who can be reasonably said to intend to live a nomadic lifestyle in the future, require their needs to be specifically and separately addressed in the Local Plan. For those who don't, their needs, requirements and demands, including for caravan living would be addressed along with those of the non-traveller community through the SHMA or HEDNA.

Site Specific Evidence

4.23 A number of site specific studies have been undertaken or commissioned to help the Authority understand the potential impacts of development. These include desk top ecological assessments, walk over protected species surveys/phase I habitat surveys and desk top archaeological surveys. This information was often provided in conjunction with the submission of sites in the SHLAA process.

4.24 Generally, with regard to plan allocations, the Authority does not undertake full on-site investigatory surveys. These should be undertaken by a developer at their expense to support a subsequent planning application. When seeking to establish whether a Local Plan allocation is appropriate, the Authority will assess whether there is sufficient information to be able to determine what the likely impacts of development would be; whether the site could be safely and appropriately developed in line with the policy requirements set out in the Plan; or whether

the costs of dealing, for example, with remediation or flood risk are likely be prohibitive in terms of development being viable.

- 4.25** Each of the proposed allocation sites has been assessed to understand which ecosystem services are located within the site. These are identified through nine different symbols. Generally, allocation sites have some of the ecosystem services symbols rather than all. Relevant criteria were added to individual site allocation policies to deliver matters associated with each ecosystem service.

Evidence generated through consultation

- 4.26** The National Park Authority has consulted the town and parish councils on emerging site allocations and has used the feedback to formulate the policies in the Sites and Settlements chapter. The NPA shared the first draft SHLAA with town and parish councils in 2014 and asked for feedback on the individual sites before publishing the final report in 2015. The NPA also held an informal Sites & Settlements consultation with the town and parish councils on the emerging allocations in autumn 2016. Officers shared confidential maps with the councils and discussed the emerging allocations at the parish workshops held in each of the three counties; the responses fed into the early formulation of the allocation policies. Further meetings were held in spring and summer 2017 with a number of other town and parish councils where allocations changes significantly from those published in the Preferred Options Local Plan.

5. POLICY FORMULATION: SELECTING SITES FOR ALLOCATION

- 5.1** Decisions on the Local Plan's choice of site allocations is informed by evidence and the professional judgment of Officers. Essentially, the process is iterative: that is, it is informed by national policy and the evidence studies, and by consultation responses throughout the plan's development. This is the professional planning aspects of plan making: weighing all these factors together to determine the most appropriate allocation sites to deliver the Local Plan Development Strategy.
- 5.2** As this process is undertaken, the SA also looks at the proposed sites and reasonable alternatives, and assesses the economic, social and environmental effects of developing the site for the use proposed against an agreed set of SA objectives. This also informs the choices made, in terms of the final sites for allocation, and the allocation policies' criteria. This process may change some of the initial assumptions or judgments made and/or refine the choices or site specific requirements to mitigate adverse effects, as may the HRA. Essentially, the approach to selection is both 'top down' and 'bottom up'. As such, the Authority has considered
- how sites fit in with the Plan's vision and objectives and the overall spatial strategy; and
 - what developable sites are there to choose from, and how would these choices inform the spatial strategy set out in Policies SD25 (Development Strategy) and SD26 (Supply of Homes).
- 5.3** In line with the spatial strategy of the Local Plan, some modestly-scaled development can and should be supported in rural settlements and in the countryside to support the rural economy, to help sustain infrastructure and services, and to provide quality and choice of housing for existing and new residents.

- 5.4** However, the SHLAA found that the requirements set out in Policy SD26 cannot be met in full on previously-developed land, or on available and developable sites within the settlement boundary as defined in current development plans. As such, there is a requirement in some settlements to meet housing through the release of sites outside their respective settlement boundaries, as currently defined in existing adopted local plans.
- 5.5** Wherever possible, allocation sites comprising previously developed land are prioritised. By focusing new development in settlements wherever developable land is available not only helps protect the landscape of the South Downs but compliments efforts to encourage the appropriate improvements of the built environment through the redevelopment and conversion of vacant and/or under-utilised sites and buildings.
- 5.6** The scale of individual sites i.e. their size in relation to the size of a host settlement, is an important factor if its existing character is to be maintained and development is to be successfully integrated over time.
- 5.7** Consultation responses are important, both from statutory agencies, and other expert bodies and also those from developers and the public/neighbours. Comments from the public are often more focused on the sites. Whilst the strength of feeling in terms of number of objections/expressions of support or the number of grounds of objection is relevant, it is the strength of the arguments that is most influential. People do not need to have planning expertise or use technical language to express valid planning concerns. Local knowledge is important: if an issue is raised that, following further investigation, cannot be satisfactorily addressed, a minor changes to policy wording will be considered.
- 5.8** Feedback from site promoters and developers is also important, particularly from site owners as sites must be 'available' to be included as allocations. If developers make representations on the wording of allocation policies for sites that the Authority feel are important, minor changes to policy wording will be considered.
- 5.9** Whilst a site may be classed as 'has potential' in the SHLAA process, this does not mean it will necessarily be allocated in the Local Plan. The SHLAA identifies a quantity of potentially developable sites, which exceeds the overall housing provision set out in Policy SD26. The Authority therefore needed to make decisions on which sites should be allocated in the Local Plan based on a range of factors, including cumulative factors, identified in the evidence studies. Indeed, the large majority of site assessed in the SHLAA were not taken forward as proposed site allocations including some assessed as acceptable in principle.

Housing Sites

5.10 There are a number of factors which apply specifically to housing site selection and these include:

1. *Could the sites and the type of housing they could deliver support the Plan's Vision and Objectives?*
Objective 8 sets out the need for affordable housing.

2. *Could the sites re-use and/or remediate previously developed land?*

Housing developments, which generally have a higher return than employment developments, can provide funds to remediate derelict and contaminated sites for the wider benefit of the National Park.

3. *Are the sites in sustainable locations?*

The most sustainable locations are ones where people can readily access key services by public transport or walking and journey times for all modes of transport to and from them are minimised. They are also ones that are well related to existing communities where they can help support existing or new services and facilities of benefit to the wider community.

4. *What would be the environmental impacts of development be?*

The Local Plan needs to set out how adverse effects can be mitigated, or benefits captured.

5. *Would development of the site be viable?*

Sites that have greater viability margin e.g. greenfield sites, can also achieve higher quality development and potentially make a greater contribution to the provision of affordable housing. The Whole Plan Viability Assessment²⁰ identifies the opportunities and potential challenges for different types of sites. It is notable that previously developed (brownfield) sites generally have lower margins of viability when compared with greenfield sites, due to the generally higher existing value of developed sites. The Authority needs to balance these important policy and quality requirements with the prioritising of brownfield land for development.

5.11 Between the Regulation 18 consultation (September 2015) and the Regulation 19 consultation (September 2017) the proposed site allocations were comprehensively reviewed. This involved:

- Removing sites where consultation and/or new evidence demonstrated that the sites was not suitable;
- Removing sites where it is considered that there are better alternatives within the settlement²¹;
- Adding new suitable sites where they had since come forward in the SHLAA process; and
- Reviewing sites proposed in the Regulation 18 consultation plan that remain where it is considered that a different approach (number of dwellings, additional uses) for the site

²⁰ Local Plan and Affordable Housing Viability Assessment (BNP Paribas Real Estate, 2017)

²¹ The Sustainability Appraisal (Aecom, September 2017) sets out (Table 3.8) an analysis of reasonable alternatives of SHLAA sites

could be more beneficial and/or that the approach proposed in the Regulation 18 was not acceptable but there was scope for an alternative approach

- 5.12** In addition, there are a very limited number of sites which have been included as allocation sites where the details were submitted too late to be included in the latest iteration of the SHLAA (December 2016). Sites such as this were subject to the same review as those submitted earlier and if considered suitable were included, for example, the proposed allocation sites at Cheriton²² (Policy SD63) and Kingston near Lewes (Policy SD77).

Gypsy and Traveller Sites

- 5.13** The selection of sites for Gypsies and Travellers pitches follows similar locational criteria to the selection of housing sites for the settled community. However, there are specific aspects of Gypsy and Traveller cultural traditions and preferences which need specific consideration, such as the preference for living in a caravan or working from home and the need to provide space suitable for both sustained periods of settled living whilst also facilitating a nomadic lifestyle. These factors have been important considerations when selecting sites.
- 5.14** Sites should be sympathetic to the local landscape/townscape. The visual impact of caravans which can be quite intrusive or out of character with the landscape/townscape, needs to be considered. Sites should be of a sufficient size to allow for soft landscaping on the edge of sites even where fences or walls may be proposed. Safe vehicular access for caravans and trailers must be possible. For these reasons, some Gypsies and Travellers prefer to live on sites in rural areas or on the edge of settlements.
- 5.15** Fuller details of the site selection process for Gypsy and Traveller site allocations are provided in the Gypsy, Traveller and Travelling Showpeople Background Paper 2016, which is published as part of the Local Plan evidence base.

Employment

- 5.16** Many of the same issues exist with both employment sites and housing sites, but some factors, particular to employment sites, include:
- The height and format of buildings tends to be larger, particularly for warehouses (B8 uses) and this can have a specific and greater landscape impact;
 - Access and site approaches would have to accommodate industrial vehicles and access to the motorway network may be important for business operations. In addition, the impact of larger vehicles in more built-up locations could have a detrimental impact on the local road network in terms of congestion and air pollution;
 - There is generally less viability for an employment end use than for housing which can influence the location of employment sites and the types of sites suitable for such a use;
 - There can be compatibility issues between employment uses and other types of development, particularly with B2 uses (general industrial) but also with B8 uses and these can impact on adjoining land users and residential amenity.

²² Located in Kilmeston Parish

6. CONCLUSION

- 6.1** This background paper sets out information on the key factors and key studies that have influenced the selection of sites and summarises the process of site selection. It is not exhaustive and does not seek to set out in detail all the information drawn from the relevant evidence base studies or site research, or explain individual site choices. The Plan itself sets out the development a particular site is required to deliver and the SA Report sets out an analysis of the performance of the sites and the reasonable alternative sites against the agreed SA Objectives.