



Sustainability Appraisal (SA) for the South Downs Local Plan

SA Report Addendum
to accompany
Main Modifications

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Quality information

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1. Introduction

- 1.1 The South Downs Local Plan, once adopted, will set out how the South Downs National Park Authority (SDNPA) will manage development over the 15 year period 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.
- 1.2 The plan is at an advanced stage of preparation. The Local Plan (*South Downs Local Plan Pre-Submission*) underwent consultation between September and November 2017. The Local Plan Pre-Submission draft presented a development strategy, allocations and planning policies for the National Park and a proposed monitoring framework for the plan, and was accompanied by an SA Report.
- 1.3 During consultation on the Local Plan Pre-Submission draft on the Local Plan, a small number of issues were raised through representations. In response to these, SDNPA undertook updates to the plan, which were submitted alongside the Local Plan. These updates were reflected in an updated SA Report. The SDNPA then submitted the Local Plan and accompanying SA Report to the Secretary of State for Communities and Local Government in Spring 2018.
- 1.4 The Local Plan has since then been the focus of examination hearings (undertaken in November and December 2018). During the hearings, the Inspector gave his preliminary views on the matters discussed and indicated that modifications would need to be made to the Plan. Further to the Main Modifications suggested and scheduled by the NPA, the Inspector proposed a number of prospective additional Main Modifications based on the consideration of the evidence he had seen and heard.
- 1.5 The Main Modifications are scheduled to be published for public consultation on 1st February 2019.

2. This SA Report Addendum

- 2.1 The Local Plan is being developed alongside a process of Sustainability Appraisal (SA), a legally required process that aims to ensure that the significant effects of an emerging draft plan (and alternatives) are systematically considered and communicated. It is a requirement that SA is undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations (the 'SEA Regulations') 2004.
- 2.2 The aim of this SA Report Addendum is essentially to present information on the proposed modifications, and alternatives where appropriate, with a view to informing the current consultation and subsequent plan finalisation.
- 2.3 In order to achieve this aim, this SA Report Addendum sets out the SA findings in relation to the Main Modifications proposed alongside the Local Plan since submission. Main Modifications made prior to submission were considered in the SA Report accompanying the Submission version of the Local Plan (April 2018).

N.B. This report is known as an SA Report 'Addendum' on the basis that it is an Addendum to the SA Report published/submitted in 2018. Whilst the focus of this report is on proposed modifications (and alternatives), there is a need to bear in mind that the proposed modifications will (if taken forward) be implemented alongside the rest of the Local Plan, i.e. that part which is not set to be modified. For this reason, explicit consideration is also given to the effects of the Local Plan as modified (i.e. the cumulative effects of the proposed modifications and the rest of the Local Plan as submitted).

3. What's the scope of the SA?

The SA Framework

3.1 The scope of SA work, with respect to the South Downs Local Plan, is introduced within the Submission version of the SA Report published in April 2018. Essentially, the scope is reflected in a list of sustainability objectives, which collectively provide a methodological 'framework' for appraisal. The SA objectives are listed below in **Table 3.1**. It has not been necessary to update the SA framework for the purposes of this appraisal.

Table 3.1: The SA framework

<i>SA theme</i>	<i>SA objective</i>
Landscape	To conserve and enhance landscape character.
Climate Change Adaptation	To ensure the SDNP communities are prepared for the impacts of climate change.
Biodiversity	To conserve and enhance the region's biodiversity.
Cultural Heritage	Conserve and enhance the historic environment, heritage assets and their settings.
Cultural Activity	To encourage increased engagement in cultural activity across all sections of the community in the SDNP and promote sustainable tourism
Health and Wellbeing	To improve the health and well-being of the population and reduce inequalities in health and well-being.
Vitality of Communities	To create and sustain vibrant communities which recognise the needs and contributions of all individuals.
Accessibility	To improve accessibility to all services and facilities.
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.
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
Climate Change Mitigation	To address the causes of climate change through reducing emissions of greenhouse gases and the consequences through adaptation measures.
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.

4. What has plan making/SA involved to this point?

- 4.1 The Local Plan-making/SA process has been ongoing for a number of years, as explained within the section of the SA Report (2018) that answers the question: 'What has plan-making / SA involved up to this point?'
- 4.2 At the current time, rather than revisit the whole process to date there is a need to explain the SA work undertaken subsequent to the examination hearings, which led to the development of proposed modifications.

5. Appraising the Main Modifications

Methodology

- 5.1 The focus of the appraisal is on the proposed modifications (given that it is the Main Modifications that are currently the focus of consultation); however, explicit consideration is also given to the effects of the Local Plan as modified (i.e. the cumulative effects of the proposed modifications and the rest of the Local Plan as submitted).
- 5.2 It should be noted that these Main Modifications considered are those which have been introduced subsequent to submission of the Local Plan. Main Modifications made alongside the Local Plan prior to submission were appraised at that stage, with appraisal findings presented in the SA Report accompanying the Submission version of the Local Plan (April 2018).
- 5.3 The current appraisal identifies and evaluates 'likely significant effects' of certain proposed modifications on the baseline, drawing on the sustainability topics/objectives identified through scoping (see Table 3.1) as a methodological framework. To reiterate, the SA themes are as follows:
 - Landscape
 - Climate Change Adaptation
 - Biodiversity
 - Cultural Heritage
 - Cultural Activity
 - Health and Wellbeing
 - Vitality of Communities
 - Accessibility
 - Sustainable Transport
 - Housing
 - Climate Change Mitigation
 - Local Economy
- 5.4 The updates to the Local Plan since submission comprise in the region of additional 30 modifications. As such the first task is to consider proposed modifications in turn, with a view to identifying those that require detailed consideration through the SA. Those which have been identified as requiring more in-depth consideration are then subsequently appraised in detail. The detailed appraisal considers the likely impact of the change in policy and where relevant, compares the change against the appraisal that has already been undertaken and reported in previous SA reports.
- 5.5 Assumptions are made cautiously, and explained within the text. The aim is to strike a balance between comprehensiveness and conciseness/accessibility to the non-specialist. In many instances, given reasonable assumptions, it is not possible to predict significant effects, but it is possible to comment on effects in more general terms.

- 5.6 It is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as appropriate. Cumulative effects are also considered, i.e. effects that become apparent once the effects of the South Downs Local Plan are considered in a wider context (i.e. recognising that it will not be implemented 'in a vacuum').

Screening of the modifications

- 5.7 Table 5.1 below summarises the Main Modifications undertaken since submission and indicates which ones have been screened in for the purposes of SA. It also presents an overview of the rationale for the decision taken.

Table 5.1: Screening the Main Modifications for the purposes of SA

Main Modification	Focus (changes in relation to...)	Screened in?	Rationale
MM1	Para 1.10 to supporting text. Change comprises a clarification with regards to the National Parks and Access to Countryside Act 1949.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
MM2	Policy SD2 (1g) to policy text. Addition to provide additional clarity on the use of soils and land classified as the best and most versatile agricultural land.	Yes	Comprises changes to the policy to provide additional provisions relating to soils and the best and most versatile agricultural land.
MM3	Policy SD2 (1g) to policy text. Includes reference to temporary events where they are regarded as development.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
MM4	Para 4.21 to supporting text. Change comprises a clarification with regards to temporary events where they are deemed to constitute development	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
MM6	Policy SD9 (1) to policy text. Includes further provisions to the policy which suggest that up to date ecological information should be provided alongside development proposals.	No	Comprises changes to the policy text to provide additional clarity. Does not constitute a change in the overall aim and focus of the policy.
MM7	Policy SD9 (1a) to policy text. Includes amendments to criteria relating to biodiversity net gain.	Yes	Comprises changes to the policy text which provides significant additional impetus to biodiversity net gain in the National Park.
MM8	Policy SD9 (1a) to policy text. Includes an additional criterion relating to protecting and supporting the recovery of rare, notable and priority species.	No	Comprises changes to the policy text to provide additional clarity. Does not constitute a change in the overall aim and focus of the policy.
MM10	Policy SD9 (2d) to policy text. Updates to text to bring policy relating to habitats into line with the NPPF.	No	Comprises changes to the policy text to provide additional clarity. Does not constitute a change in the overall aim and focus of the policy.
MM14	Policy SD10 (4) to policy text. Includes an addition to the criterion relating to the Wealden Heaths Phase II SPA.	No	Approach reflects ongoing joint working with East Hampshire District Council, Waverley District Council and Natural England.

Main Modification	Focus (changes in relation to...)	Screened in?	Rationale
MM16	Policy SD10 (5) to policy text. Includes further clarity as to the nature of in combination effects.	No	Comprises changes to the policy text to provide additional clarity. Does not constitute a change in the overall aim and focus of the policy.
MM18	Policy SD11 to supporting text: Includes additional supporting text for the Trees, Woodland and Hedgerows policy in relation to the avoidance of potential negative effects.	No	Comprises changes to the supporting text for the policy to provide additional clarity. Does not constitute a change in the overall aim and focus of the policy.
MM22	Policy SD30 (1a) to policy text. Includes additional text to ensure appropriate flexibility in relation to replacement residential dwellings outside settlement boundaries.	No	Comprises changes to the policy text to provide additional flexibility. Does not constitute a change in the overall aim and focus of the policy.
MM23	Policy SD31 (a) to policy text. Includes additional text to ensure appropriate flexibility in relation to policy.	No	Comprises changes to the policy text to provide additional flexibility. Does not constitute a change in the overall aim and focus of the policy.
MM28	Information included in Figure 7.6. Changes reflect the most recent evidence base and to provide additional clarity.	No	Comprises changes to the supporting text to provide additional clarity.
MM40	Para 7.215a & 7.215b to supporting text. Changes comprise clarifications with regards to succession housing.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
MM41	Para 7.141 to supporting text. Changes comprise clarifications with regard to definition of employment land.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
MM45	Policy SD48 (2) to policy text. Includes additional text to provide clarity in relation to the energy efficiency of new development, in particular through increasing standards expected for non-residential and multi-residential development from BREEAM 'very good' to 'excellent'.	Yes	Comprises policy changes which may significantly affect the energy efficiency of certain types of development.
MM46	Policy SD56 (2) to policy text. Includes additional text to provide additional clarity and certainty on suitable use classes including housing at Shoreham Cement Works.	Yes	Comprises updates to the policy text to provide additional clarity and certainty on suitable use classes including housing. It does not impact on the overall Local Plan strategy, but it is a significant change to the strategic site allocation.
MM50	Plan allocation SD58. Correction to site boundary.	No	Update to site boundary does not constitute a change in the overall aim and focus of the policy for the site.
MM52	Para 9.48 to policy text. New paragraph to follow to provide additional provisions in relation to biodiversity.	No	Additional provisions do not constitute a change in the overall aim and focus of the policy for the site.

Main Modification	Focus (changes in relation to...)	Screened in?	Rationale
MM57	Plan allocation SD64 (2c). Change of focus of the proposed open space at site from landscape/ recreation to biodiversity provision.	Yes	Substantive updates to policy which should be appraised.
MM58	Plan allocation SD64 (2e). Removal of text to ensure consistency with MM52.	No	Comprises minor changes to the site policy text to ensure consistency with supporting text for site.
MM59	Plan allocation SD64 (2k). Additional policy criteria to include provisions relating to foul drainage, wastewater and sewerage.	Yes	Substantive updates to policy which should be appraised.
MM72	Plan allocation SD75. Removal of supporting text.	Yes	Supporting MM73.
MM73	Plan allocation SD75. Removal of allocation due to granting of planning permission and occupation of site.	Yes	Site allocations have changed as a result of the policy.
MM74	Plan allocation SD75. Removal of map to reflect removal of allocation due to granting of planning permission and occupation of site.	Yes	Supporting MM73.
MM76	Plan allocation SD77. Modification of numbers for the site allocation.	No	Updates to numbers are insignificant given the numbers have changed from '10 to 12' to 'up to 12'. The changes do not constitute substantive changes to the policy.
MM88	Plan allocation SD89. Modification of supporting text to reflect the number of dwellings allocated on the site reducing from '30 to 32' to '15 to 18'.	Yes	Supporting MM90.
MM90	Plan allocation SD89. Modification of numbers of the site from '30 to 32' to '15 to 18'.	Yes	Update comprises substantive change in number of dwellings.
MM91	Plan allocation SD89. Additional criterion for the policy relating to the preparation of the Development Brief for the site.	No	Update provides further clarity on the requirements for the allocation, providing consistency with text presented elsewhere.
n/a	Plan allocation SD90. Reinstatement of previous text.	No	Comprises minor changes to the site policy text. The changes do not constitute a change in the overall aim and focus of the policy.
MM101	Plan allocation SD92 (3c). Addition of provisions for a direct pedestrian access to common land to the immediate west of the site (north of the A272).	No	Whilst a new pedestrian route will support recreational provision, with associated benefits, the changes do not significantly revise the findings of the appraisal.

Detailed appraisal

5.8 The following sections present an appraisal of the Main Modifications which have been screened in as requiring closer examination through the SA process.

Main Modifications relating to MM2

Table 5.2: SA themes for which modifications may have an impact

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

5.9 The modification provides additional impetus in the ecosystem services policy (Core Policy SD2) on the protection of soils resources in the National Park. This includes through stipulating that development proposals should seek to use soils sustainably and protect the best and most versatile agricultural land.

5.10 Overall the modification will not lead to significant effects, either on their own or in combination with other policies. This is due to soils resources already having a degree of protection through the existing policy wording, and the site allocation policies recognising where such agricultural land classified as the best and most versatile has the potential to be lost. The policy will however support provisioning ecosystem services through promoting the productivity of agricultural land in the National Park. This will bring benefits in relation to the Local Economy SA theme, and, more indirectly, to the Vitality of Communities SA theme.

Main Modifications relating to MM7

Table 5.3: SA themes for which modifications may have an impact

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

5.11 The modification strengthens the biodiversity and geodiversity policy (Policy SD9) in relation to biodiversity net gain. The change is brought about through a rewording of the policy from stating that “*Opportunities for net gains in biodiversity should be identified and incorporated*” to stating that new development should “*Identify and incorporate net gains for biodiversity*”.

5.12 This change of focus will help ensure that biodiversity net gain is more effectively taken forward through new development proposals in the National Park. Given the policy will apply to all new development proposals, this has the potential to increase the significance of existing positive effects associated with Policy SD9. This includes through further supporting habitats, species and ecological networks in the National Park. The strengthening of the policy in this regard will also help species adapt to the likely effects of climate change.

Main Modifications relating to MM45

Table 5.4: SA themes for which modifications may have an impact

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

5.13 Whilst the Main Modification does not constitute a change in the overall aim and focus of Policy SD48, it increases the standards expected for non-residential and multi-residential development from BREEAM ‘very good’ to ‘excellent’. As such the modification comprises policy changes which have the potential to considerably enhance the energy efficiency of these types of development. This has the potential to increase the significance of potential positive effects in relation to energy efficiency. The policy is also likely support the quality of multi-residential development, as well as the health and wellbeing of those who reside in this type of housing.

Main Modifications relating to MM46

Table 5.5: SA themes for which modifications may have an impact

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

In relation to housing provision, whilst the modifications to Policy SD56 do not change the focus of the allocation from a tourism/visitor/leisure and employment-led mixed use development, it provides additional clarity as to the delivery of housing on site. This is as a subordinate land use to support the viability of development where appropriate.

The changes to the text also reassert that the environmental-led restoration of the site will be the overall precursor for development proposals. This has the potential to bring additional benefits from the policy in relation to the ‘Landscape’, ‘Climate Change Adaptation’, ‘Biodiversity’ and ‘Cultural Heritage’ SA themes.

Whilst these modifications comprise substantive changes to the policy, the effects of these policies in relation to the SA themes are unlikely to be significant. This is given they provide additional clarity and certainty on the key existing approaches for the site previously put forward through Policy SD56.

Main Modifications relating to MM57

Table 5.6: SA themes for which modifications may have an impact

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

5.14 The Main Modification continues to allocate an area of open space to accompany development at the Land South of London Road, Coldwaltham site. It however changes the focus of the open space from a recreation and landscape-led open space to an area which ‘retains and enhances’ this space for biodiversity. This is a modification which has the potential to further limit potential negative effects on biodiversity from development at this location. The change is significant given that 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.

5.15 Given existing recreational provision available locally, the modification is unlikely to limit potential positive effects in relation to the ‘Health and Wellbeing’ SA theme.

Main Modifications relating to MM59

Table 5.7: SA themes for which modifications may have an impact

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

5.16 The Main Modification introduces additional policy criteria for allocation policy SD64 (land South of London Road, Coldwaltham). This incorporates further provisions relating to foul drainage, wastewater and sewerage, as well as surface water run-off and management of odours.

5.17 This will support the provisions of a number of the existing Local Plan Development Management policies, including Policy SD49 (Flood Risk Management), SD50 (Sustainable Drainage Systems), SD54 (Pollution and Air Quality), with positive effects in relation to the Climate Change Adaptation and Health and Wellbeing SA Themes.

5.18 Whilst the additional policy criteria provide appropriate site-specific provisions in relation to the allocation, effects are unlikely to be significant given the existing provisions of the Development Management policies of the Local Plan.

Main Modifications relating to MM72, MM73 and MM74

Table 5.8: SA themes for which modifications may have an impact

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

- 5.19 The Main Modifications remove the site allocation for three permanent Gypsy and Traveller pitches at Half Acre, Hawkley.
- 5.20 Given the site has now gained planning permission, and the site allocation no longer comprises part of the Local Plan, the previously identified effects in relation to landscape and surface water flood risk will no longer arise as a direct result of the Local Plan. Likewise, due to the pitches already being delivered on the site, the deallocation of the site will also not affect the delivery of provision for local Gypsy and Traveller needs in the National Park.
- 5.21 For similar reasons, the deallocation of the site is unlikely to lead to significant cumulative positive or negative effects when considered in combination with the other allocations and policies of the Local Plan.

Main Modifications relating to MM88 and MM90

Table 5.9: SA themes for which modifications may have an impact

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

- 5.22 The central element of the two modifications is the reduction of the number of homes to be allocated on site SD89: Land at Pulens Lane, Sheet from '30 to 32' to '15 to 18'
- 5.23 In relation to the environment-focused SA themes, the reduction in the size of the allocation at the site will help limit the previously identified potential effects from the allocation on biodiversity, the setting of the historic environment and landscape character.
- 5.24 The allocation of fewer houses in Sheet has some potential to limit housing delivery in the Petersfield area. However, given existing planning permissions, the delivery of housing elsewhere in the town's vicinity, and the minimal effect of c.15 dwellings on overall housing delivery in the National Park, the changes to the policy will not lead to significant overall impacts in relation to the 'Housing' and 'Vitality of Communities' SA themes.

6. Next steps

Plan finalisation

- 6.1 Subsequent to the current consultation the Inspector will consider all representations received, before deciding whether to report on the Local Plan's soundness (with modifications as necessary), or hold resumed examination hearings.
- 6.2 Assuming that the Inspector is ultimately able to find the Local Plan 'sound', it will then be adopted by the National Park Authority. At the time of adoption an 'SA Statement' will be published that explains the process of plan-making/SA in full and presents 'measures decided concerning monitoring'.

