



# Sustainability Appraisal (SA) for the South Downs Local Plan

SA Report to accompany  
the Submission version of the Local Plan

Project number: 60470477

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## Quality information

### Prepared by

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Cheryl Beattie  
Environmental Planner

Nick Chisholm-Batten  
Associate

### Checked by

---

Nick Chisholm-Batten  
Associate

### Approved by

---

Steve Smith  
Technical Director

## Revision History

Revision	Revision date	Details	Authorized	Name	Position
V2	19 <sup>th</sup> April 2018	Version for submission	19 <sup>th</sup> April 2018	Nick Chisholm-Batten	Associate

## Prepared for:

South Downs National Park Authority

## Prepared by:

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

T: +44 117 901 7000  
aecom.com

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# Introduction

# 1. Introduction

## 1.1 Background

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

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

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

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

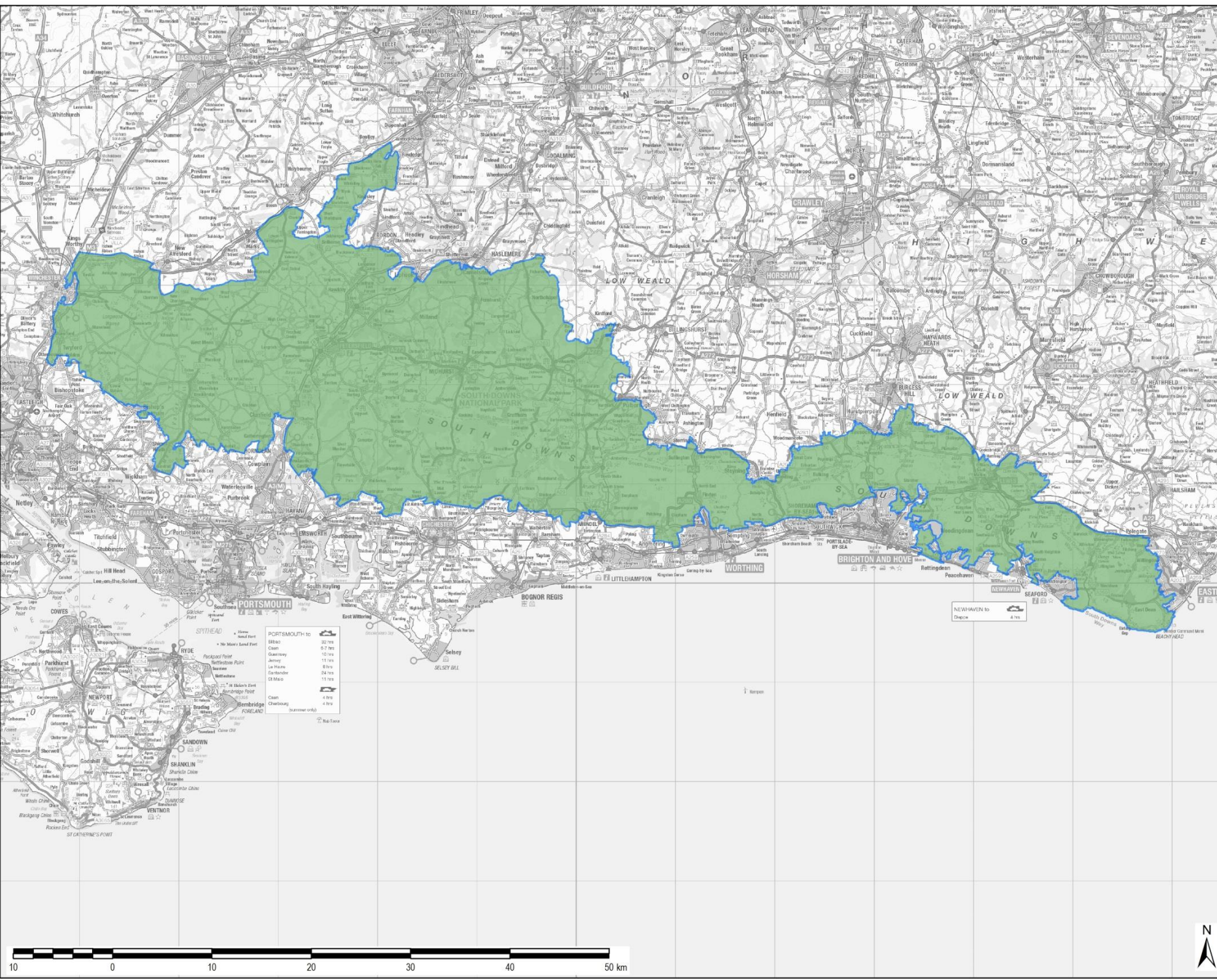
<b>Name of Responsible Authority</b>	South Downs National Park Authority
<b>Title of Plan</b>	South Downs Local Plan 2014-2033
<b>Subject</b>	Spatial plan
<b>Purpose</b>	The South Downs Local Plan 2014-2033 will set out how the SDNPA believes the National Park should evolve and manage development over the next 15 years. The Local Plan contains planning policies designed to help deliver the statutory National Park purposes and duty. It is being developed in the context of the Partnership Management Plan <sup>1</sup> for the National Park and the planning documents of the surrounding local authorities in accordance with the statutory Duty to Cooperate.
<b>Timescale</b>	2014-2033
<b>Area covered by the plan</b>	South Downs National Park (see Figure 1.1). The local government context relating to the National Park is represented in Figure 1.2.
<b>Summary of content</b>	The South Downs Local Plan will establish the key planning policies for the National Park. These include core, strategic, strategic site allocation and development management policies.  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
<b>Plan contact point</b>	Dan Ashe, Planning Policy Officer, South Downs National Park Authority  Email address: <a href="mailto:dan.ashe@southdowns.gov.uk">dan.ashe@southdowns.gov.uk</a>  Telephone number: 01730 819283

<sup>1</sup> SDNPA (2013) Partnership Management Plan 2014-2019

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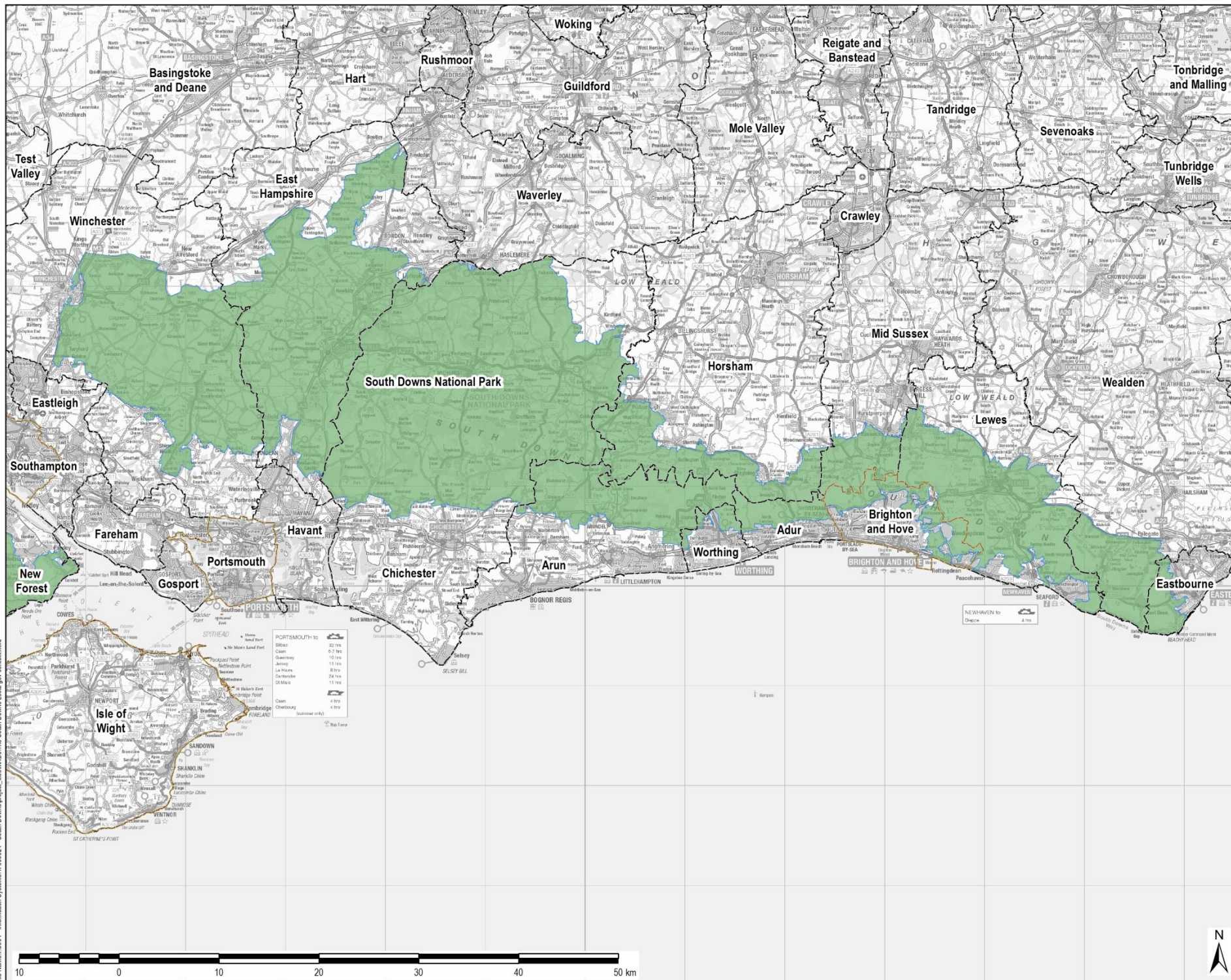
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AECOM  
 South House  
 Aesop Lane, Basingstoke  
 Hampshire, RG21 7PP  
 Hampshire RG21 7PP  
 Fax 01256 310200  
 www.aecom.com

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**FIGURE 1.1**

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Purpose of Issue **DRAFT**

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

Drawing Title **SOUTH DOWNS NATIONAL PARK: LOCAL GOVERNMENT CONTEXT**

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AECOM  
 Root House  
 Oneop Lane, Basingstoke  
 Hampshire, RG21 7PP  
 Telephone: (01256) 310200  
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**FIGURE 1.2**

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## 1.2 Context for the Local Plan

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

The South Downs was established as a National Park in 2010 and was designated in recognition of its landscapes of exceptional beauty and importance. It contains over 1,600km<sup>2</sup> of England's most iconic lowland landscapes stretching from Winchester in the west to Eastbourne in the east.

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

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

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

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

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

In addition, Section 62 of the Environment Act 1995 requires all relevant authorities, including statutory undertakers and other public bodies, to have regard to these Purposes. Where there is an irreconcilable conflict between the statutory Purposes, the Sandford<sup>2</sup> Principle is statutorily required to be applied and the first Purpose of the National Park will be given priority.

## 1.3 Current stage of plan making and previous stages

This SA Report accompanies the Submission version of the Local Plan (*South Downs Local Plan 2014-2033*). The Local Plan will be submitted to the Secretary of State in April 2018 for independent Examination in Public.

Plan-making for the SDLP has been underway since 2013. In February 2014, a Local Plan *Options Consultation Document*<sup>3</sup> was released for consultation for a period of eight weeks. Representing the outcome of the first stage in the Local Plan's preparation process, the purpose of the consultation was to gain views on potential policy approaches that the Local Plan could take on key planning issues. The *Options Consultation Document* was accompanied by an Options SA Report<sup>4</sup> which was produced with the intention of informing this early stage of the plan's preparation.

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

Regulation 19 consultation on the Local Plan, accompanied by an SA Report, was released for consultation in September 2017. The current SA Report has updated the SA Report accompanying Regulation 19 consultation to reflect changes made to the Local Plan following consultation.

<sup>2</sup> The Sandford Principle – a statement first made by Lord Sandford in his committees report on possible changes to the management and legislation governing National Parks and now in the Environment Act 1995 which states that: 'if it appears that there is a conflict between those two Purposes, any relevant Authority shall attach greater weight to the first [Purpose]'.  
<sup>3</sup> South Downs National Park Authority (February 2014) South Downs National Park- Local Plan Options Consultation Document  
<sup>4</sup> URS/AECOM (February 2014) Sustainability Appraisal for the South Downs Local Plan- Findings of the SA of Issues and Options

## 1.4 What is the plan seeking to achieve?

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

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

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

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

## 1.5 Vision and objectives for the plan

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

### Box 1.1: Vision for the South Downs National Park

#### *By 2050 in the South Downs National Park:*

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

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

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

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

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

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

### Box 2.2: Local Plan Objectives

#### Objectives to meet the National Park Vision

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

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

## 1.6 Sustainability appraisal explained

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

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

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

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

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

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

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

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

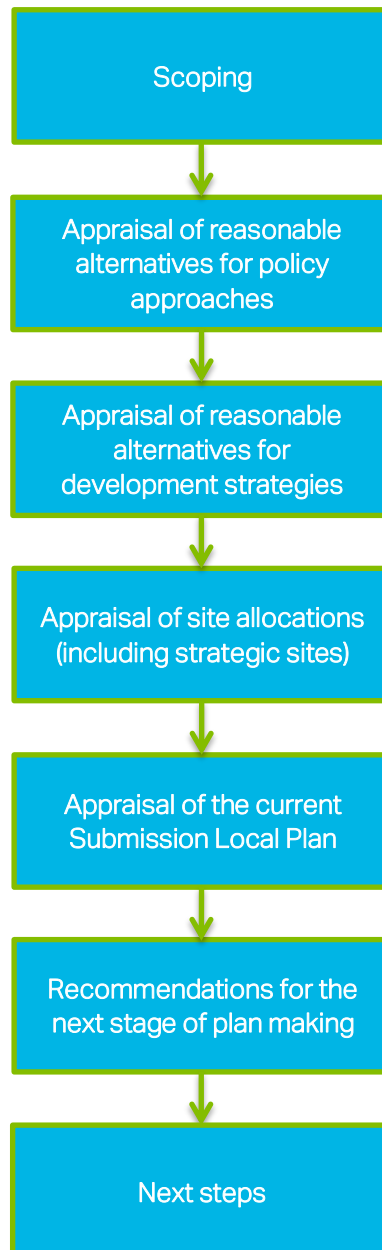
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<sup>5</sup> Commission of the European Communities (2009) Report from the Commission to the Council, The European Parliament, The European Economic and Social Committee and the Committee of the Regions on the application and effectiveness of the Directive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

## 1.7 This SA Report

The SDNPA are submitting the Local Plan to the Secretary of State in April 2018 and will undergo an Independent Examination in Public. This SA Report will accompany the submission version of the Local Plan.

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



**Figure 1.3 Information presented in this SA Report**

## 1.8 SA scoping

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

The Scoping Report presented the following elements:

### Context review and baseline data

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

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

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

### SA Framework

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

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

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

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

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

**Table 1.2: SA Framework for the South Downs Local Plan**

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

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



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

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

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

## 2. Reasonable alternatives in SA/SEA

Preparation of the South Downs Local Plan began in 2013. In February 2014, a SDLP Options Consultation Document<sup>7</sup> was released for consultation for a period of eight weeks. Representing the outcome of the first stage in the SDLP's preparation process, the purpose of the consultation was to gain views on potential policy approaches that the Local Plan could take on key planning issues. The Options Consultation Document was accompanied by an Options SA Report<sup>8</sup> which was produced with the intention of informing this early stage of the plan's preparation.

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

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

A key element of the SA process is the appraisal of 'reasonable alternatives' for the Local Plan. The SEA Regulations<sup>10</sup> are not prescriptive as to what constitutes a reasonable alternative, stating only that the SA Report should present an appraisal of the '*plan and reasonable alternatives taking into account the objectives and geographical scope of the plan*'.

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

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

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

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

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

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

<sup>10</sup> Environmental Assessment of Plans and Programmes Regulations 2004

## 2.1 Appraisal of reasonable alternatives for policy approaches

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

**Table 2.1: Issues considered in the Options Consultation Document**

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

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

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

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

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

The *Options Consultation Document*, and accompanying Options SA Report presenting the appraisal of the reasonable alternatives for policy issues, can be accessed via [www.southdowns.gov.uk/planning](http://www.southdowns.gov.uk/planning)

## 2.2 Appraisal of reasonable alternatives for development strategies

### 2.2.1 Alternative development strategies considered

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

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

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

These development strategy options were generated with the aim of testing different growth scenarios that emerged from the Strategic Housing Market Assessment (SHMA) and from land supply availability as set out in the Strategic Housing Land Availability Assessment (SHLAA), both of which were specifically commissioned to inform the Local Plan. The growth scenarios considered in 2015 are set out in **Table 2.2** and **2.3** below. The homes per annum figures in the second column of **Table 2.3** incorporate figures for unimplemented planning permissions of 1,253 homes and a projected windfall allowance over the plan period of 765 homes, which was the current status when the appraisal of these options was undertaken in 2015.

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

**Table 2.2: Growth Scenarios and relationship to allocations**

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

**Table 2.3: Growth scenarios considered for the Local Plan**

<b>Low</b>	<b>208 homes per annum</b>	The low growth scenario of 208 homes per annum is the minimum number of homes to be provided in the National Park in order to maintain the size of the current population as set out in the 2015 SHMA. This is based on seeking to maintain the current population and the blended approach to modelling household formation rates utilised in the SHMA. It should be noted that this allows some net in-migration without which the population of the National Park would fall notably and thus undermine the viability of local services.
<b>Medium</b>	<b>255 homes per annum</b>	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. The scenario 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.
<b>Medium + 60%</b>	<b>303 homes per annum</b>	The medium + 60% growth scenario of 302 homes per annum takes forward the requirements set out for settlements in adopted and emerging JCSs, namely Winchester, East Hampshire and Lewes. 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.
<b>High</b>	<b>450 homes per annum</b>	The high growth scenario of 450 homes per annum relates to projecting forward population growth based on five year trends as set out in the SHMA

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



Taking into consideration the growth scenarios and the spatial approaches, the SDNPA initially explored the following development strategies in **Table 2.4**. The allocation for each growth scenario excludes the unimplemented planning permissions and projected windfall allowance (see **Table 2.2**).

**Table 2.4: Alternative development strategies considered for the Local Plan**

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

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

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

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

1. Dispersed High

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

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

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

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

The evidence to support this consideration comprised:

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

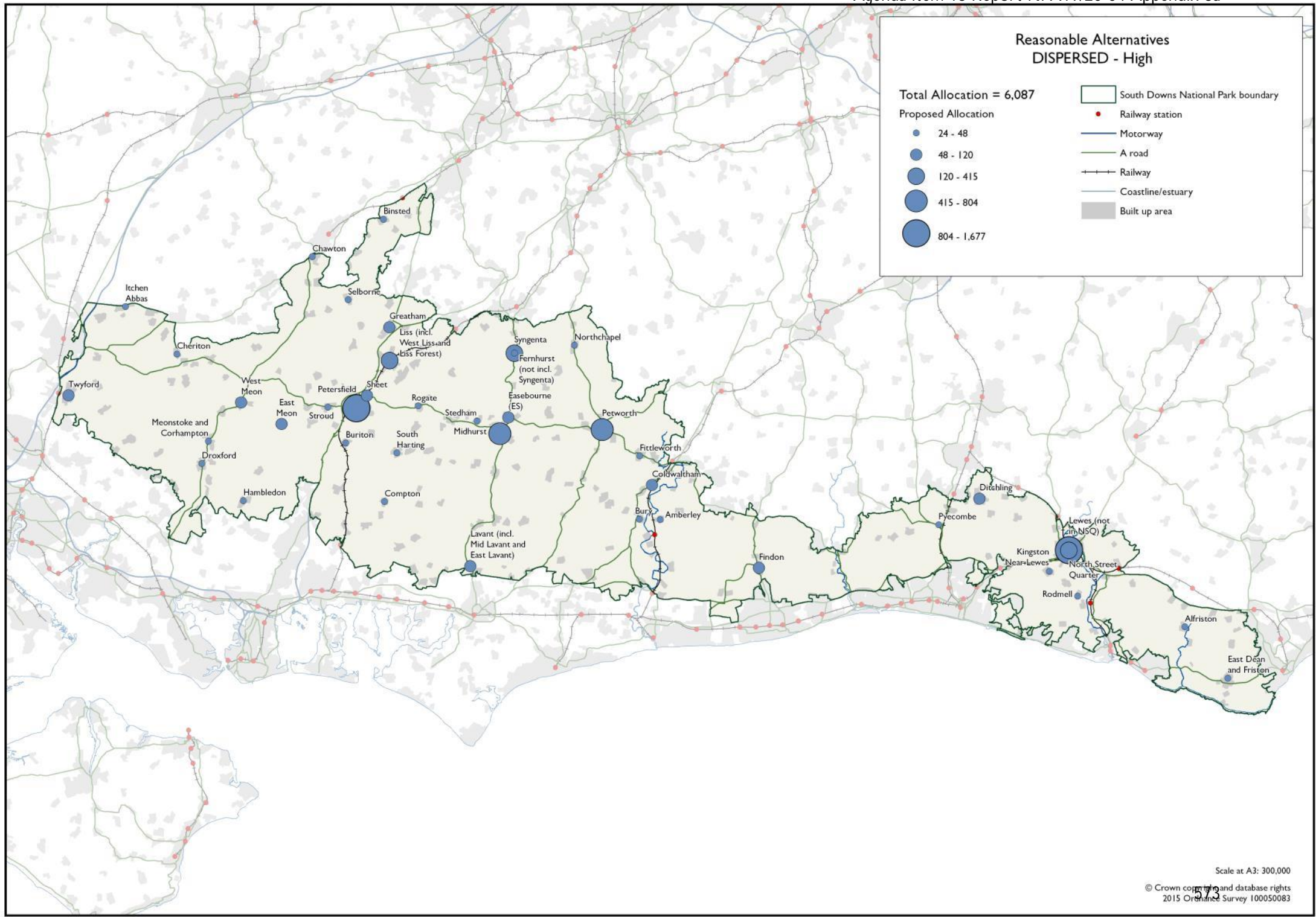
Initially settlements were identified if any of the above applied. It was, however, recognised that 1) above does not necessarily imply suitability for commuting or school travel. As such, settlements were excluded on the basis of 2) above where the total journey time to a major settlement was more than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

Hypothetical housing numbers (in addition to existing permissions and windfall allowances) for the five options have been presented in **Table 2.5**, which are represented in the maps which follow the table. These are presented by settlement (and in some cases including strategic sites) which have been earmarked for allocating sites in order to allow this testing to take place. **It is stressed that this was undertaken solely for the purposes of testing reasonable alternatives for the Local Plan and were broadly based upon apportioning SHMA requirements in accordance with the various emerging strategies and noting provisional findings of the SHLAA.**

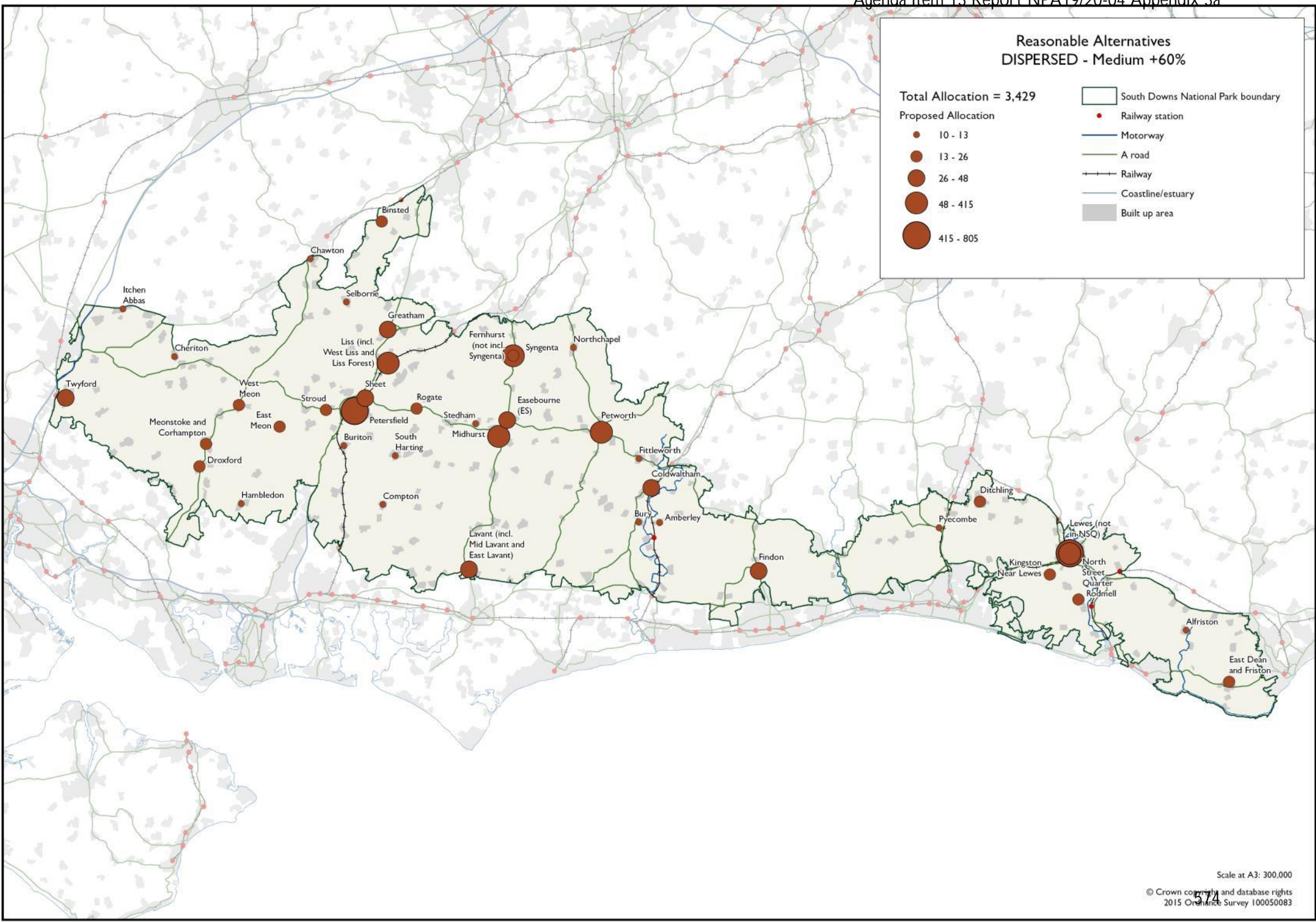
**Table 2.5 Settlements and hypothetical quantum of development allocated to each settlement (total over plan period) under each development strategy option**

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

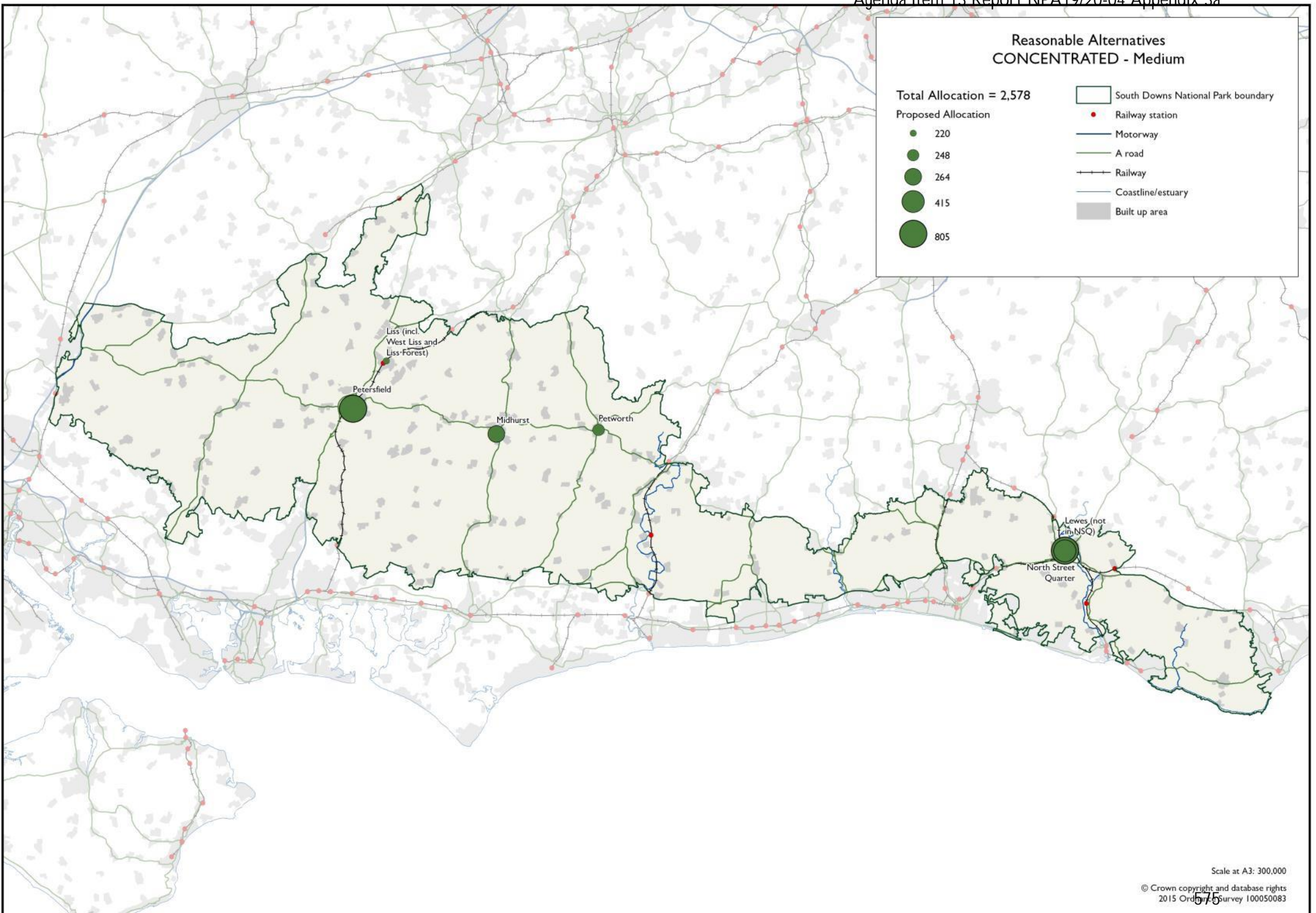
Settlement	Option 1: Dispersed High	Option 2: Dispersed Medium +60%	Option 3: Concentrated Medium	Option 4: Dispersed Medium	Option 5: Dispersed Medium - Sustainable Transport
Meonstoke and Corhampton	44	18	0	11	0
Midhurst	599	240	264	150	85
Northchapel	24	10	0	6	0
Petersfield	805	805	805	700	820
Petworth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



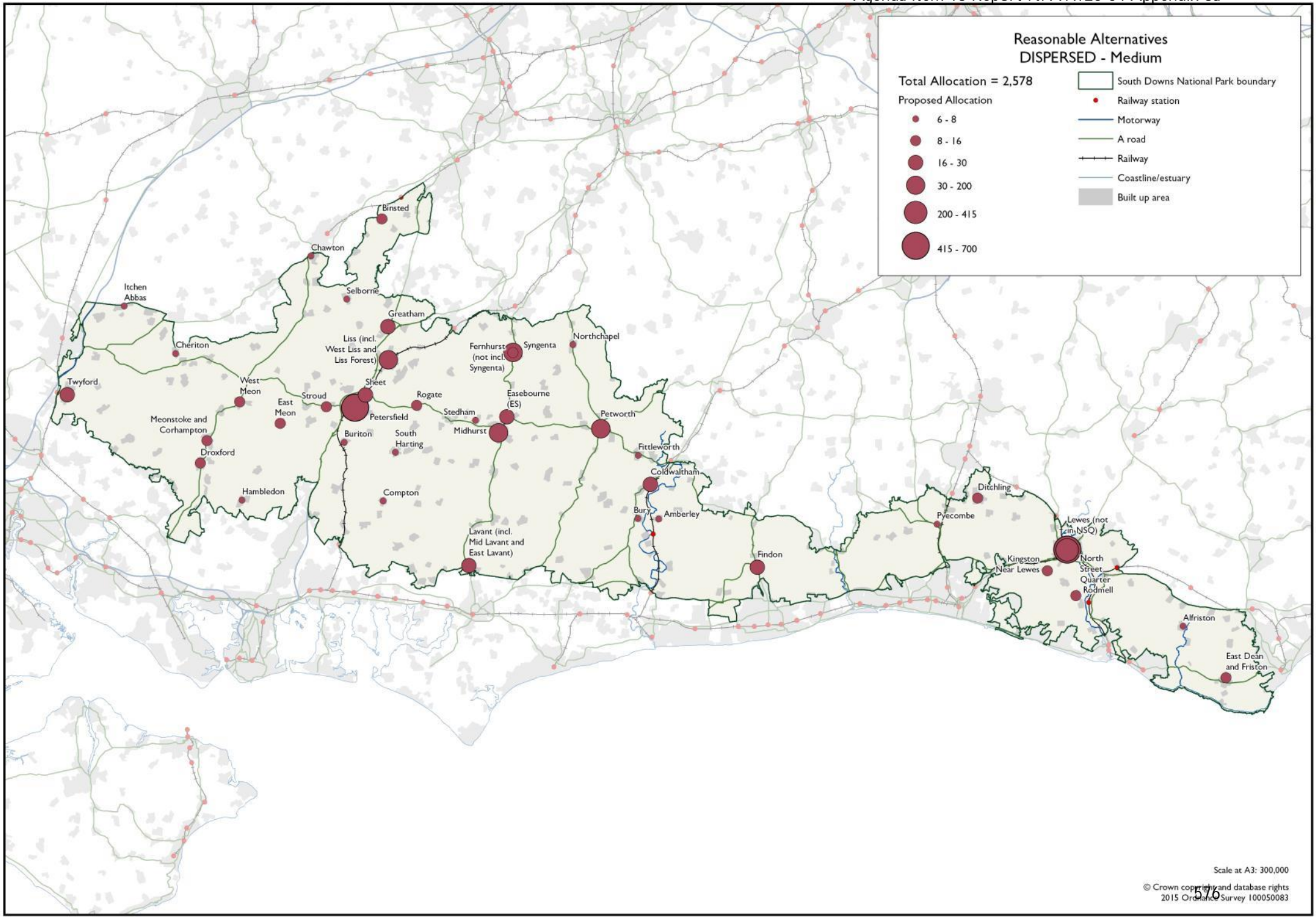
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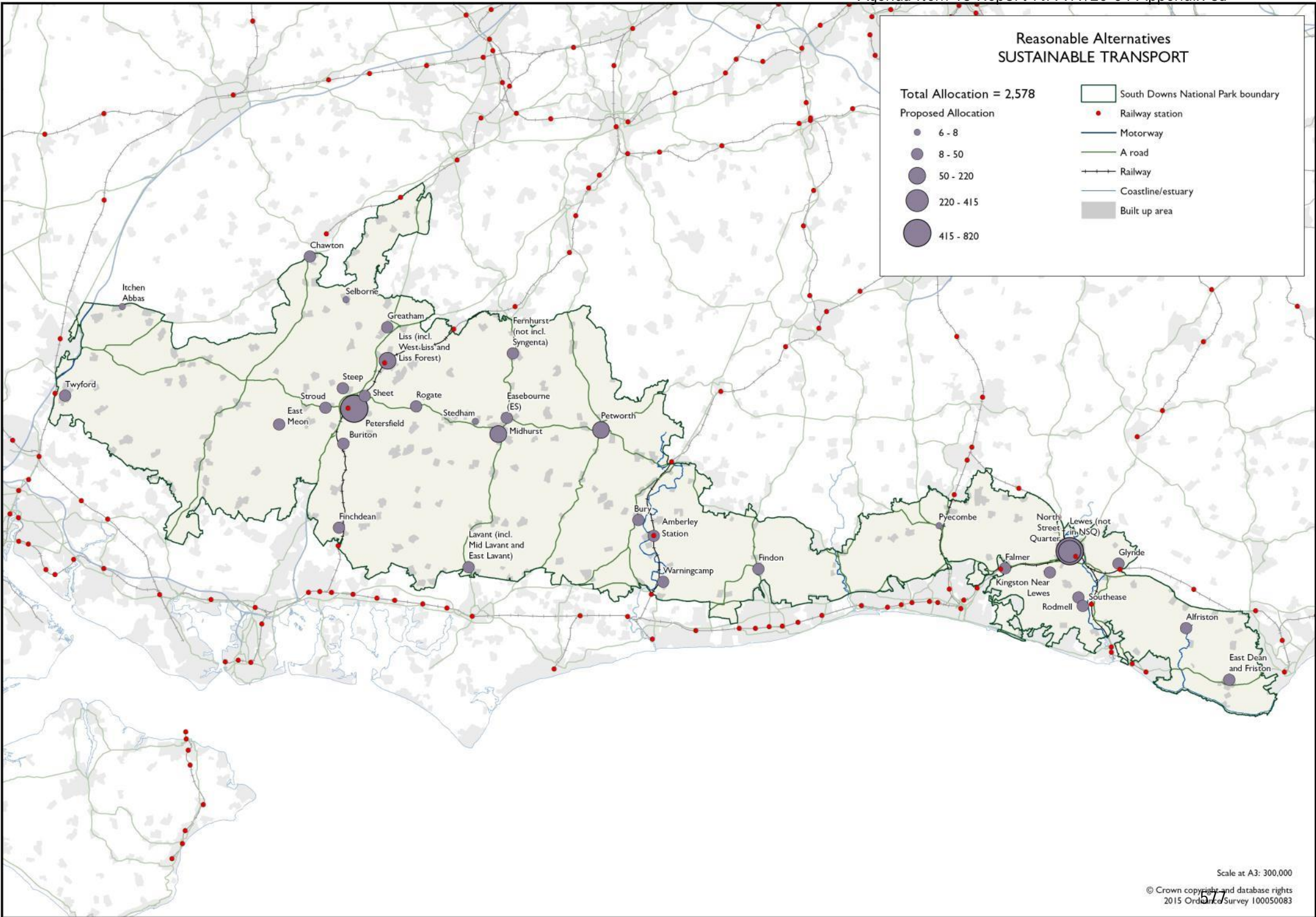
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Scale at A3: 300,000







**Reasonable Alternatives  
SUSTAINABLE TRANSPORT**

Total Allocation = 2,578

Proposed Allocation

- 6 - 8
- 8 - 50
- 50 - 220
- 220 - 415
- 415 - 820

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

Scale at A3: 300,000

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## 2.2.2 Appraisal findings: development strategy options

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

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

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

**Table 2.6: Development strategy options, summary of appraisal findings**

**Key:**

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

<i>Rank of preference / categorisation of effects</i>						<i>Summary of potential significant effects</i>
Option 1: Dispersed High	Option 2: Dispersed Med+60%	Option 3: Concentrat ed Med	Option 4: Dispersed Med	Option 5: Dis Med SustTran		
<b>5</b>	<b>4</b>	<b>3</b>	<b>1</b>	<b>3</b>		<p><b>Significant negative effects</b> have the potential to arise from the two options with the higher levels of housing proposed (Option 1, Dispersed High and Option 2: Dispersed Medium +60%). This is linked to the increased likelihood of these options contributing to the 'Forces for Change' on landscape character identified by the South Downs Integrated Landscape Character Assessment. Option 3: Concentrated Medium option is also likely to lead to significant effects in the vicinities of the five largest towns in the National Park through focussing development at these locations, and, for the same reason, Option 5: Dispersed Medium (Sustainable Transport) is likely to lead to significant effects in the vicinities of Petersfield, Liss and Lewes, and some other settlements where development sites that are suitable in landscape terms have not been identified. The Dispersed Medium option has a reduced likelihood of leading to significant negative effects on landscape character and visual amenity. In terms of tranquillity, Option 1, through increasing the scale and dispersal of new development, has the most potential of the options to lead to <b>significant negative effects</b> on light pollution and tranquillity.</p>

<i>Rank of preference / categorisation of effects</i>						<b>Summary of potential significant effects</b>
Option 1: Dispersed High	Option 2: Dispersed Med+60%	Option 3: Concentrat ed Med	Option 4: Dispersed Med	Option 5: Dis Med SustTran		
<b>Climate change adaption</b>	<b>5</b>	<b>4</b>	<b>3</b>	<b>1</b>	<b>3</b>	<p>No significant effects are anticipated as a result of the five options. Whilst a number of the options have the potential to lead to elevated levels of flood risk at locations where the SFRA has highlighted particular issues, it is considered that the provisions of the NPPF and national policy in relation to flooding will help guide development away from flood risk areas and ensure that appropriate mitigation measures are implemented. Likewise, in relation to water supply, it is not anticipated that the scale and location proposed through any of the options will lead to significant effects if Water Resource Management Plans are implemented effectively. Local Plan policy implementing water efficiency standards can provide further mitigation for potential negative effects.</p> <p>In terms of coastal zone management the proposed development strategies put forward through the five options limit development within the coastal areas and estuaries of the National Park in East and West Sussex.</p>
<b>Biodiversity</b>	<b>5</b>	<b>4</b>	<b>3</b>	<b>1</b>	<b>2</b>	<p>Although it is recognised that potential effects are largely dependent on the location, scale and nature of development, it is considered that a higher level of development within a settlement increases the likelihood (and potential magnitude) of negative effects. Therefore, in terms of the larger settlements in the National Park, the options which promote a higher degree of development at these locations (Dispersed High, Dispersed Medium +60% and Concentrated Medium option) have increased potential for effects on the designated sites present in the vicinity of these towns and villages. Dispersed Medium Sustainable Transport also has the potential for impacts on the sites in the vicinities of Petersfield, Liss and Lewes. In terms of the nature conservation designations located in the vicinity of the smaller settlements in the National Park, the likelihood for significant effects may be limited by the scale of allocations at most of the locations proposed through the options. However, this does not preclude the possibility of significant negative effects on biodiversity in the vicinity of these settlements.</p> <p>Overall the potential for significant negative effects cannot be excluded for any of the options at this strategic scale of assessment but are picked up through the individual site assessments and HRA. In this context it is recognised that these elements cannot be determined in detail for the five options due to the broad strategic nature of the options. In relation to effects on European designated sites the Habitats Regulations Assessment currently being undertaken for the Local Plan will help limit any significant effects relating to these sites through the implementation of avoidance and mitigation measures where appropriate.</p>

<i>Rank of preference / categorisation of effects</i>						<i>Summary of potential significant effects</i>
Option 1: Dispersed High	Option 2: Dispersed Med+60%	Option 3: Concentrat ed Med	Option 4: Dispersed Med	Option 5: Dis Med SustTran		
<b>Cultural heritage</b>	5	4	3	1	2	<p>An increased scale of development proposed for the five primary towns and villages of the National Park through Options 1, 2 and 3 (Lewes, Petersfield, Midhurst, Petworth and Liss) has the potential to have <b>significant negative effects</b> on the historic environment and setting of these settlements without the implementation of careful design and layout and appropriate locational policies. Similarly, Option 5, through increasing development at Petersfield, Liss and Lewes, has the potential to increase the likelihood of negative effects at these towns. Option 3, through exclusively focussing effects on the five larger settlements in the SDNP, will help limit direct impacts from new development on the remaining settlements in the National Park. However, through limiting new development in the majority of villages in the South Downs, Option 3 also reduces the scope for enhancements to be made to the setting of cultural heritage assets and the rejuvenation of existing features and areas of historic environment interest.</p> <p>In terms of Options 4 and 5, overall effects on the historic environment will depend on the location, design and layout of new development. However it is also recognised that the broader spread of development proposed through these options could enable a wider range of cultural heritage assets to benefit from potential settlement enhancements and contributions.</p>
<b>Cultural activity</b>	4	3	5	2	1	<p>Larger settlements enable a greater variety of cultural activities to be supported. In this context, through delivering an increased degree of development to Lewes, Petersfield, Midhurst, Petworth and Liss, Options 1, 2 and 3 will support existing and potentially promote an additional range of cultural activities at these locations. This will also support visitor offer in these towns and villages. However Option 3, through providing almost no development will limit any slight enhancements to the vitality of smaller settlements and will do less to encourage the development of new cultural activities in these settlements.</p> <p>Cultural activity and the visitor economy in the National Park are also closely linked to its landscape, setting, cultural heritage and local distinctiveness. In this context, Option 1 has the most potential to undermine the special qualities of the National Park through increased levels of housing development. Option 5, which promotes a dispersed approach to development, whilst also focussing on the settlements with good accessibility by sustainable transport modes, will support a robust and sustainable visitor and tourism economy and increased accessibility to cultural activities. All effects in this regard are however unlikely to be significant.</p>

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

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

<i>Rank of preference / categorisation of effects</i>						<i>Summary of potential significant effects</i>
	Option 1: Dispersed High	Option 2: Dispersed Med+60%	Option 3: Concentrat ed Med	Option 4: Dispersed Med	Option 5: Dis Med SustTran	
<b>Sustainable transport</b>	5	4	2	3	1	<p>Options 1, 2 and 3 which direct an increased level of housing provision to the five largest settlements in the National Park (Lewes, Petersfield, Midhurst, Petworth and Liss) will promote accessibility through directing housing to the settlements with the broadest range of services and facilities and best connections by sustainable transport modes. Option 5 also directs an increased level of development to Lewes, Liss and Petersfield. This will promote the use of sustainable modes of transport. In relation to the smaller settlements in the National Park, the options which promote a more dispersed pattern of development (Options 1, 2, 4 and 5) will support the viability of local services in these settlements. This may help reduce the need to travel to some services and facilities. Through limiting development to the five largest settlements in the SDNP, Option 3 is less likely to support existing services and facilities in the smaller settlements in the National Park which may increase the need to travel for those living in these villages, should local facilities close as a result of lower levels of new housing development, although there are many other factors affecting service viability.</p> <p>The Dispersed Medium Sustainable Transport Option is the best performing in relation to encouraging sustainable transport use. Through both 1) supporting existing services across a wider range of settlements, and 2) locating new development in the settlements with good sustainable transport links, the option will promote access by non-car modes to services and facilities both within the settlement and to those which cannot be accessed locally. This will support <b>significant positive effects</b> for this sustainability theme. But they could be tempered by any changes in public transport provision.</p>
<b>Housing</b>	1	2	5	3	3	<p>By virtue of delivering a larger supply of housing, the higher growth scenarios have increased potential to meet housing needs in the SDNP. In this respect Option 1, and to a lesser extent, Option 2, through delivering a higher quantum of development across a wider range of settlements in the National Park, and facilitating housing growth will do most to deliver a wider range of housing which meets a variety of needs. This will support <b>significant positive effects</b> in terms of helping the National Park to meet objectively assessed and affordable housing needs. Whilst Option 3 will not deliver housing in smaller settlements in the National Park (and as such has been ranked lowest), it may have the potential to generate more affordable housing through S106. However the option, through precluding development in the majority of settlements in the National Park, will have <b>significant negative effects</b> in relation to the delivery of rural housing.</p>



<i>Rank of preference / categorisation of effects</i>						<i>Summary of potential significant effects</i>
	Option 1: Dispersed High	Option 2: Dispersed Med+60%	Option 3: Concentrat ed Med	Option 4: Dispersed Med	Option 5: Dis Med SustTran	
<b>Climate change mitigation</b>	<b>5</b>	<b>4</b>	<b>1</b>	<b>3</b>	<b>2</b>	Overall, due to the relatively limited contribution of new development proposed through the options in the context of wider regional, national and global greenhouse gas emissions, and the associated likelihood of the influence of the growth strategy promoted through the SDLP on emissions being minor, no significant effects are anticipated in relation to climate change mitigation.
<b>Economy</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>1</b>	<b>2</b>	<p>New housing provision in the SDNP will support the National Park's towns and villages' economic vitality through promoting the viability of local services and facilities, enhancing local economic offer, increasing the local market for goods and services and supporting cultural activities. In this context, Options 1, 2, 4 and 5 will support the economic viability and vitality of smaller settlements in the National Park, with potential positive effects for the local economy. For similar reasons, Option 3 will limit economic opportunities resulting from population increases in the smaller villages of the National Park, reducing the economic vitality of rural settlements. In the context of the vitality of the rural economy over the longer term, this has the potential to lead to negative effects, to be balanced against increased benefits through Option 3 to the economy of the three largest communities in the National Park, Lewes, Petersfield and Midhurst.</p> <p>The vitality of the visitor economy in the SDNP is closely linked to the National Park's landscape, setting, cultural heritage and local distinctiveness. A key element relating to the visitor economy will be to achieve an effective balance between supporting the vitality and viability of a settlement and protecting and enhancing the natural and built environment. In light of this consideration, Option 5, which promotes a dispersed approach to development whilst also focussing on the settlements with good accessibility by sustainable transport modes, will support a robust and sustainable visitor and tourism economy. This is likely to lead to positive effects in relation to this theme. However, the increased focus on allocating to settlements in close proximity to some measure of sustainable transport is not, in all cases, supporting the existing rural service centres. Settlements such as Finchdean and Warningcamp which have access to public transport but are not well-served in terms of services and this tempers the overall positive effect on the rural economy in the short-medium term.</p>

## Conclusions

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

Option 3 (Concentrated Medium), through focussing a higher level of housing growth on the five largest settlements in the National Park, also has the potential to have significant effects on landscape and biodiversity, albeit limited to significant effects in the vicinity of Lewes, Petersfield, Midhurst, Petworth and Liss. Option 4 and 5, through promoting a dispersed medium growth approach to housing provision, will help limit concentrated effects on sensitive environmental receptors, and increase opportunities for avoidance and mitigation measures. However, Option 5 allocates land to some settlements where no development sites have been found that would be suitable in landscape terms.

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 negative effects in relation to rural vitality, rural service provision, and the rural economy, and significant negative effects on the objective of meeting localised housing needs.

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 and to sustainable transport objectives. 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 having a better impact on landscape, biodiversity and cultural heritage.

### 2.2.3 Testing higher and lower levels of housing delivery

The 2015 South Downs SHMA considered the potential level of housing required to support the estimated growth in employment as set out in the Employment Land Review<sup>12</sup>. This analysis suggests a growth in jobs from 2013 to 2033 of 11.6% (0.6% per annum). In considering the housing market implications, data has been modelled on the basis of this percentage increase in jobs and assumed an equivalent increase in the resident working population.

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

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

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

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

### 2.2.4 Employment options

Policies SD34: Sustaining the Local Economy and SD35: Employment Land of the submission version of the Local Plan address sustainable economic development in the National Park. The main evidence base supporting these policies is the Employment Land Review (ELR) that was prepared in 2015 by GL Hearn and updated in the 2017 HEDNA. Calculating these figures was problematic due to the paucity of statistical returns available for the National Park area. SD35 sets out the following requirements for new employment land, meeting the objectively assessed need for employment as calculated in the ELR and HEDNA:

- Offices: 5.3 ha;
- Industrial 1.8ha.
- Small scale warehousing 3.2ha

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

<sup>12</sup> GL Hearn (2015) South Downs Employment Land Review, updated 2017

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

focused on small businesses many of which are home based and simply do not have the requirements for large scale allocations of employment land for offices, warehouses etc.

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

The SDNPA has considered that, based upon landscape sensitivity assessment from the most recent SHLAA published in December 2016, it has become apparent that the Dispersed High option cannot be delivered without significant impact upon the landscape character of the majority of the settlements in the National Park, including the five larger settlements of Lewes, Liss, Midhurst, Petersfield and Petworth. Similarly, the SA of the 2014 East Hampshire Joint Core Strategy (JCS) concludes that the JCS does not seek to maximise growth or realise all short term economic opportunities at Petersfield due to the sensitivities of the National Park. The JCS only allocates land for 100 dwellings in smaller settlements outside of Petersfield and Liss.

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 delimit future growth to levels appropriate to the existing function and character of the development. The rural settlements of the National Park form an integral part of the landscape character and are one of the seven special qualities of the National Park; the housing proposed under the Dispersed High option could not be absorbed in many historic villages without significant detrimental landscape 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 recreational 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>14</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 which 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

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<sup>14</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.

such as local schools. The option is likely to threaten growth in the rural economy by doing less to enable new sites for employment and housing to be delivered.

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.

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 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. Detailed justifications for the exact distribution of housing numbers between settlements under this option are set out in the evidence base document 'Sites and Settlements: Route Map for Housing Allocations'.

The distribution of housing in Local Plan departs slightly from the hypothetical figures tested in section 3.2.1 and **Table 2.5**, proposed by the Dispersed Medium option. The settlements, and the reasons for the departure from the housing numbers considered, are as follows:

**Table 2.7: Settlements where housing numbers depart from the figure considered through the Dispersed Medium option**

<b>Settlement</b>	<b>No. proposed through Dispersed Medium Option</b>	<b>No. proposed through current policy SD26</b>	<b>Reason for departure</b>
Alfriston	6	15	The Settlement Facilities Study (SFS <sup>[1]</sup> ) gave a score of 9.5 – the 9th highest score for all SDNP settlements. Therefore it was deemed appropriate to further facilitate the use of suitable and available sites in the village. The redevelopment of these sites will help enhance the quality of the public realm in the village. A further potential site for development was also submitted in 2017 during Preferred Options consultation on the Local Plan.
Binsted	12	11	Allocation is for 10 – 12 homes, so no departure.

<sup>[1]</sup> The Settlement Facilities Study was undertaken for the Local Plan evidence base. Its purpose is to assist in identifying the role and function of settlements in the National Park based on the number and type of facilities and services they provide. The study can be accessed at: <https://www.southdowns.gov.uk/wp-content/uploads/2015/09/Settlement-Facilities-Assessment-Report-and-Appendix-A.pdf>

<b>Settlement</b>	<b>No. proposed through Dispersed Medium Option</b>	<b>No. proposed through current policy SD26</b>	<b>Reason for departure</b>
<u>Buriton</u>	7	10	The original provision figure for Buriton was 7 on the basis of an alternative site (Kiln Lane). This site is no longer proposed as detailed officer assessment of sites in Buriton concluded that the Greenway Lane site now currently proposed was more suitable. This has capacity for up to 10 new homes. The increase from 7 to 10 is not significant (just 3 homes' difference) and this change is not therefore considered a departure.
Chawton	6	0	No suitable and available sites were identified in the SHLAA
Cheriton / <u>Hinton Marsh</u>	6	14	The site identified in Cheriton has a capacity of 12-15. Village has a primary school and scores 6 in SFS. Constraining number of houses on the site identified to under ten dwellings would limit the scope for delivering affordable homes and could result in an artificial boundary or inefficient use of the land.
Coldwaltham	20	28	The figure of 20 was a capacity-based number from the suitable and available site identified in the SHLAA. However further work has been undertaken, and the allocation site boundary has been amended resulting in a larger site area which includes a substantial area of enhanced open space, as well as a slightly higher capacity for new homes. The amended site in the Submission plan is assessed as having capacity for 25-30 new dwellings. The new higher figure is appropriate for the new site.
Compton	24	0	No suitable and available sites were identified in the SHLAA.
<u>Corhampton and Meonstoke</u>	11	18	At the time the Preferred Options was published, no site or sites had been identified to deliver the 11 dwellings proposed in Policy SD23. Subsequently the site allocated in Policy SD65 of the Pre-submission Local Plan, consisting of three extant planning permissions, has been identified. As the sites already have permission, and the total dwellings permitted on the two sites is 18, it is appropriate to update the requirement for the village with this number, and the provision in Policy SD26 for Corhampton and Meonstoke has consequentially been updated. However, since the sites are currently being built out, it would not be appropriate to allocate them.
Droxford	11	26	Scores 6 in the SFS which makes it well-placed for growth in terms of local facilities. Suitable site subsequently identified with capacity for 26 dwellings (pending highways assessment).

<b>Settlement</b>	<b>No. proposed through Dispersed Medium Option</b>	<b>No. proposed through current policy SD26</b>	<b>Reason for departure</b>
Easebourne	20	50	Figure increased to reflect high sustainability of the settlement, which is located adjacent to Midhurst. Since Preferred Options, three further sites have been identified in the SHLAA updates as suitable and available. Given this and the high provision of local facilities (scored 10 in SFS), it was considered appropriate to allocate two further sites. Two of the three sites proposed also mainly comprise previously developed land.
East Meon	15	17	The increase from 15 to 17 dwellings is not significant and not therefore a departure. It is due to a change in the number identified in the East Meon Neighbourhood Plan.
<u>Fernhurst</u>	211	220	The Fernhurst Neighbourhood Plan identifies sites having capacity for 220 homes (the vast majority of these are allocated at the Syngenta strategic site).
<u>Findon</u>	20	28	The number identified for Findon has evolved significantly as the Local Plan has progressed. The Preferred Options figure was 20, based on SHLAA information on site availability. Subsequently the SHLAA has been reviewed and a refinement of this figure has been possible, based on two sites identified as suitable and deliverable, which are between them expected to deliver approximately 28 dwellings. This is considered appropriate for a sizeable and sustainable settlement, and in line with a dispersed medium growth strategy.
Greatham (Hampshire)	30	38	The site at Greatham has been carried forward from preferred options into the submission local plan, but with a more refined capacity assessment of 35 to 40 dwellings.
Hambledon	6	0	There were no suitable and available sites identified in the SHLAA.
Itchen Abbas	8	9	Allocation is for 8 – 10 homes, so no departure.
Lavant	20	20	No departure at this stage of the Local Plan process. Note however that the Lavant Neighbourhood Plan allocates land for about 55 dwellings within the National Park. This is allowed for within the Plan's policies, as set out Policy SD25 supporting text (paragraph 7.31).
Lewes	835	875	The figure for Lewes has been updated to reflect planning permissions granted at North Street Quarter, and the Lewes Joint Core Strategy (including a revised figure for Old Malling Farm strategic allocation).

<b>Settlement</b>	<b>No. proposed through Dispersed Medium Option</b>	<b>No. proposed through current policy SD26</b>	<b>Reason for departure</b>
Midhurst	150	175	At the time the preferred options was prepared, most sites needed to deliver housing in Midhurst had not been identified. The increase to the Midhurst figure reflects that sites have been identified that have a combined capacity of approximately 175 dwellings. This is not considered a significant departure from the preferred options, and is in line with a medium growth dispersed strategy.
Northchapel	6	0	There were no suitable and available sites identified in the SHLAA.
Petersfield	700	805	Petersfield Neighbourhood Plan has been made and allocates land for 805 dwellings; this number has been carried forward to policy SD26 of the Local Plan.
Rodmell	11	0	There were no suitable and available sites identified in the SHLAA.
Sheet	20	31	The amended figure for Sheet results from the identification of an allocation site (SD89: Land at Pulens Lane) with capacity of 30-32 residential dwellings. Sheet is a sustainably located village within walking distance of Petersfield town centre, therefore this is considered in line with a medium growth dispersed strategy.
South Harting	8	13	The amended figure for South Harting results from the identification of two allocation sites (SD90: Land at Loppers Ash and SD91: Land North of the Forge) with combined capacity of 11-14 residential dwellings. This is an increase of 3-6 dwellings which is not a significant departure from the preferred options.
Stedham	6	16	The current figure is based on estimated capacity of Stedham Saw Mill site, which is expected to come forward as a mixed use development. Stedham scores 5.5 in the SFS, indicating that it is well-placed to support a modest amount of housing development. The site is partly previously developed and its re-development will serve to conserve and enhance the gateway into the village from the A272.
Stroud	11	28	The village is 1.5 miles from the town of Petersfield, indicating that it is well-placed for a modest amount of housing growth. The SHLAA indicates that the suitable and available site has capacity for 30 dwellings. Current proposal for the site includes option to provide a new community hall.



<b>Settlement</b>	<b>No. proposed through Dispersed Medium Option</b>	<b>No. proposed through current policy SD26</b>	<b>Reason for departure</b>
Steep	0	10	Steep was not originally provided with a figure. However following reassessment, a suitable and available site has been identified. Steep was always included as an SD25 (formerly SD22) settlement with a policy boundary, and scored 5 in the SFS (has a primary school). It is also only 1.5 miles from the centre of Petersfield. Therefore it is appropriate to provide for some housing growth, commensurate with the capacity of the site identified.
West Ashling	0	16	West Ashling was not originally provided with a figure. However a new SHLAA site has since emerged which was found to be suitable and available. The village is close to Chichester, and scored 4 in the SFS indicating that some housing is appropriate. The one site identified can accommodate 15-17 dwellings.
West Meon	16	11	Two housing allocations were proposed for West Meon in the preferred options. A reassessment of these sites identified that one of them (Land at Meadow House) was no longer available. The other site (Land at Long Priors) has been carried forward into the Submission Local Plan. The provision proposed for the settlement has been reduced accordingly. A reduction of 5 dwellings is not considered significant, particularly considering that other settlements have seen an increase in their figures.

The housing numbers allocated in the remaining settlements are consistent with the numbers previously considered through the Dispersed Medium or Dispersed Medium + 60%. It is important to note that the overall number of homes, and pattern of dispersal (i.e. looking beyond small local variations in housing numbers for specific settlements) have remained consistent with the medium dispersed growth strategy. However, in contrast to the earlier hypothetical assessment, the individual site assessments show that the higher levels of development in some village can be accommodated without significant landscape or biodiversity harm.

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

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

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

Table 2.8 shows the criteria applied in terms of landscape sensitivity assessment of SHLAA sites. All the sites allocated for housing in the Local Plan were assessed through the SHLAA and were therefore assessed in terms of landscape sensitivity.

**Table 2.8: Landscape sensitivity assessment criteria for SHLAA sites**

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

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

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

In order to provide a clear road map on the selection of sites for allocations in the Local Plan it is important to look at reasonable alternatives in the SA. If a site has been strongly rejected in the SHLAA for landscape or other reasons, it is not a reasonable alternative and need not be considered by the SA. This approach applies equally to sites that are no longer available. However, there are some sites that can be considered to be reasonable alternatives that are not allocated in the plan. A basic appraisal of these sites against the SA sustainability objectives is set out in **Table 2.9**.

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

- when a site has been included in the Preferred Options but then taken out, because a preferable site for the settlement has since been identified
- when the SHLAA has identified other 'has potential' sites that have not been taken forward, as there are more sites than needed to accommodate the level of growth deemed suitable for the settlement.
- when housing sites have received planning permission and significant progress has been made on developing the site. There are three such sites: the former SD65: land east of Warnford Road, Corhampton; SD70: Land behind the Fridays, East Dean; and SD87: Land at Church Lane, Pyecombe. They are not listed below since they are considered to now form part of the baseline.

**Table 2.9: Appraisal of sites identified as reasonable alternatives**

<b>Site (including SHLAA reference)</b>	<b>Landscape</b>	<b>Climate Change Adaptation</b>	<b>Biodiversity</b>	<b>Cultural Heritage</b>	<b>Cultural Activity</b>	<b>Health and Wellbeing</b>	<b>Vitality of Communities</b>	<b>Accessibility</b>	<b>Sustainable Transport</b>	<b>Housing</b>	<b>Climate Change Mitigation</b>	<b>Local Economy</b>
<b>EA005 Land at Greenways and Kiln Lanes, Buriton</b>	-		?			?	+	+	+	+	-	+
<p>Allocation of the site for housing would have the potential to lead to significant landscape impacts. This is given the size of the site and its High/Medium landscape sensitivity. The site has some biodiversity interest, relating to on site hedgerows.</p> <p>The site is relatively close to the railway line, with the potential for noise effects on health and there is a Historic Landfill Site within 250 metres of the proposed development site.</p> <p>The site is not constrained by historic environment considerations and the site is not located within an area at risk of fluvial, surface water or groundwater flooding. The site is accessible to existing village facilities and amenities, including the school, pub and sports facilities, and the facilities in Petersfield via bus.</p>												
<b>WI071 Grey Farm Bungalow, Cheriton</b>	?		-				+	+	+	+	-	+
<p>The upper most easterly part of the site is considered to be Medium High landscape sensitivity and the more westerly section to be medium sensitivity. The site is located close to the River Itchen SAC/SSSI and is within the Impact Risk Zone for the SSSI for all planning applications. As such development at this location has the potential to have negative impacts on these key internationally and nationally designated sites without appropriate avoidance and mitigation measures.</p> <p>The site is not constrained by historic environment considerations and the site is not located within an area at risk of fluvial, surface water or groundwater flooding. The site is accessible to existing village facilities and amenities and is located close to an existing bus link between Winchester, New Alresford and Petersfield.</p>												
<b>CH147 1&amp; 2 Rotherfield Mews, Dodsley Lane, Easebourne</b>	?		?	?			+	-	+	+	-	+
<p>The site is located close to the Easebourne Conservation Area and has some townscape sensitivity. It is also located adjacent to a SNCI. The site has significant access issues relating to its location at the entrance to the hospital.</p> <p>The site is not located within an area at risk of fluvial, surface water or groundwater flooding</p> <p>The site, which is located approximately 800m to the centre of Midhurst, has good accessibility to the services and facilities in the town.</p>												
<b>AR047 Atalanta and Mayland, Findon Bypass, Findon</b>							+	+	+	+	-	+
<p>The site is a previously developed site and is accessible to existing village facilities and amenities, including the school, post office, shops, pubs and sports/recreational facilities. The site is also, due to its relative proximity to Worthing, accessible to the range of services, facilities and amenities located in the nearby south coast conurbation.</p> <p>The site is not constrained by historic environment or biodiversity considerations and the site is not located within an area at risk of fluvial, surface water or groundwater flooding.</p>												
<b>AR046 Soldiers Field Stables, Findon</b>	?						+	+	+	+	-	+
<p>The site has Medium Landscape sensitivity, and is located on a greenfield site with no existing screening. As such there is the potential for landscape character impacts from new development at this location.</p> <p>The site is not constrained by historic environment or biodiversity considerations and the site is not located within an area at risk of fluvial, surface water or groundwater flooding.</p> <p>The site is accessible to existing village facilities and amenities, including the school, post office,</p>												

<b>Site (including SHLAA reference)</b>	Landscape	Climate Change Adaptation	Biodiversity	Cultural Heritage	Cultural Activity	Health and Wellbeing	Vitality of Communities	Accessibility	Sustainable Transport	Housing	Climate Change Mitigation	Local Economy
shops, pubs and sports/recreational facilities. The site is also, due to its relative proximity to Worthing, accessible to the range of services, facilities and amenities located in the nearby south coast conurbation.												
<b>LE014, Land to the South of Wellgreen Lane, Kingston near Lewes</b>	?					+	+	?	+			+
<p>The site has some landscape sensitivity, and development at this location would have impacts on the existing villagescape of Kingston near Lewes. The site is not constrained by historic environment or biodiversity considerations and the site is not located within an area at risk of fluvial, surface water or groundwater flooding.</p> <p>The site is accessible to existing village facilities and amenities, including the primary school, village hall, pub and sports/recreational facilities. The site is also, due to its relative proximity to Lewes, accessible to the range of services, facilities and amenities located in the town, though bus links are poor.</p>												

This process has led to 38 sites being allocated in the Local Plan as housing, employment or mixed use sites. The site allocation policies have been discussed and assessed in **section 4.2 and Appendix E** of this SA Report.

*Consideration of flood risk through site selection*

A further element to note with regards to site selection relates to flood risk. The development of the Local Plan has been informed and influenced by Strategic Flood Risk Assessments (SFRA). A Level 1 SFRA and Water Cycle Study was commissioned in 2015. An update to this and a Level 2 SFRA was undertaken in 2017. This combined report has assessed all allocated sites in the Local Plan that are at risk from fluvial and tidal flooding; surface water flooding and groundwater flooding. The study also includes information on the effects of climate change and how this might further increase the risk of flooding across the National Park area.

Whilst the sites where significant and irreconcilable flood risk issues have not been taken forward for the purposes of the Local Plan, the SFRA process has highlighted that some sites with the potential to be taken forward through the Local Plan have more limited flood risk issues. This included sites with the possibility of development taking place within small areas of fluvial/tidal, surface water and groundwater flood risk without avoidance and mitigation measures.

The identification of such issues on a site has not however precluded an allocation being taken forward through the Local Plan. This is given the provisions of the NPPF, which enables such development to be taken forward through the application of the Sequential Test (and if necessary, applying the Exception Test) and safeguarding land from development that is required for current and future flood management. As such, any development which is being taken forward through the Local Plan on sites with areas of potential flood risk will be informed by the findings of the Level 2 SFRA and its recommendations.

Flood risk on the sites taken forward by the Local Plan has been evaluated in conjunction with the findings of the Level 2 SFRA (**section 4.2 and Appendix E**) and proposed avoidance and mitigation measures.

## 2.3 Appraisal of options for the Shoreham Cement Works site

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

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

In light of the opportunities provided by the site, the 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 have been considered for the site through the SA process, linked to different uses for the site relating to Land Use Classes<sup>15</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 following table present appraisal findings in relation to the four options introduced above. These are organised by the twelve sustainability themes.

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

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<sup>15</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)

**Table 2.10: Appraisal of options for the Shoreham Cement Works site**

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

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

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

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

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

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

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

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SA theme	Discussion of potential effects and relative merits of options	Rank of preference, options			
		1a	1b	2	3
Biodiversity	<p>A range of biodiversity constraints are present on and in the vicinity of the site. The site itself is a Regionally Important Geological Site, comprises a range of BAP Priority Habitats (including good quality semi-improved grassland, deciduous woodland and lowland calcareous grassland) and is home to protected bird species.</p> <p>The Beeding Hill to Newtimber Hill SSSI, is immediately adjacent to the site on its northern boundary. The SSSI is on the scarp slope of the South Downs and is a site of both geological and biological importance. Three nationally uncommon habitats are represented: south-east chalk grassland, juniper scrub and calcareous pedunculate oak-ashbeech woodland. The SSSI supports a rich community of invertebrates, especially harvestmen and has some uncommon butterflies and moths.<sup>16</sup> The SSSI has been evaluated to be in a 'favourable' condition.</p> <p>The site is also located within the SSSI's 'Impact Risk Zone' for 'all planning applications- except householder applications'. As such, strategic scale development of all types (i.e. under each of the options) raises the possibility of adverse effects on the SSSI without avoidance and mitigation measures. The cement works site also comprises a range of BAP Priority Habitats, including.</p> <p>The site is located within the Brighton and Lewes Downs Biosphere Reserve, which is part of a global network of Biosphere Reserves recognised by UNESCO as 'special places for testing interdisciplinary approaches to understanding and managing changes and interactions between social and ecological systems, including conflict prevention and management of biodiversity'.</p> <p>In this context each option has the potential to lead to significant impacts on habitats and species without appropriate design and layout and the integration of infrastructure which supports ecological networks in the area. In terms of differentiating between the options, Option 1a potentially proposes a smaller scale of development in land take terms than the other options however, both housing options have a greater impact from recreational disturbance (caused by people and pets).</p> <p>It is recognised that a smaller scale of development may limit the scope for larger scale green infrastructure enhancements on site which support habitats, species and ecological networks. As such, whilst all of the options have the potential to lead to effects on biodiversity, the significance of effects depends on the integration of measures to protection and enhance biodiversity on the site.</p>	1	1	1	1

<sup>16</sup> Beeding Hill to Newtimber Hill SSSI citation: [http://www.sssi.naturalengland.org.uk/citation/citation\\_photo/1000374.pdf](http://www.sssi.naturalengland.org.uk/citation/citation_photo/1000374.pdf)



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

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

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

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

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

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

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

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

## 2.4 Appraisal of alternative approaches to delivering affordable housing

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

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

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

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

These are as follows:

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

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

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

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

**Table 2.71: Appraisal of affordable housing options**

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

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

SA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt 1	Opt 2
Landscape	Impacts under either option is possible, and depends on the design and layout of new development, the location of development in relation to key viewpoints the area, and the integration of high quality green infrastructure provision.  However, if all housing provision- including affordable housing- is appropriately located, and design and layout is sensitive to landscape character, then there should be no difference between the two options in terms of landscape impacts.	?	?
Climate Change Adaptation	In relation to flood risk, it is not possible to differentiate between the options given this depends on the location of development and the incorporation of mitigation measures such as sustainable urban drainage systems (SuDS). It is also considered that the provisions of the NPPF and national policy will help guide development away from flood risk areas and ensure that appropriate mitigation measures are implemented. In terms of the wider elements relating to climate change, this also depends on the provision of appropriate infrastructure alongside new housing, such as GI provision, and appropriate design and layout.	?	?
Biodiversity	The significance of effects depends on the design and layout of new development and the integration of infrastructure which supports ecological networks in the area. As such, if all housing provision- including affordable housing- seeks to integrate these elements, then there should be no difference between the options in terms of impacts on biodiversity and ecological networks.	?	?
Cultural Heritage	It is not possible to differentiate the options in terms of potential effects on the historic environment. Effects depend on the design and layout of new development, the retention of distinct features contributing to local character, the location of development in relation to key viewpoints in the area, and the integration of high quality green infrastructure provision.  If all housing provision- including affordable housing- is appropriately located, and design and layout is sensitive to local character, then there should be no difference between the two options in terms of impacts on the historic environment.	?	?

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

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

SA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt 1	Opt 2
Cultural Activity	<p>The implementation of a more consolidated approach to affordable housing provision through Option 2 has the potential to have particular benefits for affordable housing provision in smaller settlements, where available sites tend to be of a more limited size.</p> <p>As such, Option 2, through facilitating an increased level of affordable housing provision in smaller settlements in the National Park, has increased potential to support the vitality of these settlements by facilitating the provision of housing for a broader range of groups and ages. This will support cultural activities in these settlements.</p>	2	1
Health and Wellbeing	<p>Option 2, through enabling an increased number of residents to find affordable housing and remain locally, will reduce the need to travel for existing employment and amenities. The option will also support community cohesion through helping to meet local housing needs and reinforcing existing social networks.</p> <p>Through these benefits, the option therefore has increased potential to support the physical and mental health and wellbeing of existing residents.</p>	2	1
Vitality of Communities	<p>Option 2 has the potential to have particular benefits for affordable housing provision in smaller settlements, where available sites tend to be of a more limited size.</p> <p>This will support the vitality of smaller settlements by facilitating the provision of housing for a broader range of groups and ages, and supporting community cohesion through helping to meet local housing needs and reinforcing existing social networks.</p>	2	1
Accessibility	<p>Option 2 will enable an increased level of affordable housing provision in the National Park, particularly in smaller settlements and rural areas. This will enable an increased number of existing residents to find affordable housing and remain locally, supporting accessibility to current employment and social networks.</p>	2	1
Sustainable Transport	<p>Option 2 has the potential to facilitate an increased number of affordable houses in smaller settlements, where available sites tend to be of a more limited size. Whilst these settlements tend to be more poorly served by public transport networks, this will also help people live closer to employment and social networks, reducing the need to travel.</p> <p>Overall however there is unlikely to be a significant differentiation between the options in relation to this SA theme.</p>	?	?
Housing	<p>Option 2 will help boost provision of affordable housing on new development sites by increasing the affordable housing requirements for smaller sites. This will help the delivery of affordable housing in the National Park. The option also has the potential to have particular benefits for affordable housing provision in smaller settlements, where available sites tend to be of a more limited size.</p>	2	1
Climate Change Mitigation	<p>The provision of an additional level of affordable housing through Option 2 is unlikely to lead to significant effects on greenhouse gas emissions if energy efficiency measures are integrated within all types of housing provision.</p>	?	?

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

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

SA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt 1	Opt 2
Economy	<p>The implementation of a more far-reaching approach to affordable housing provision through Option 2 has the potential to have particular impacts on affordable housing provision in smaller settlements, where available sites tend to be of a more limited size.</p> <p>This will support the vitality of smaller settlements by facilitating the provision of housing for a broader range of groups and ages, with benefits for the rural economy.</p> <p>Through encouraging an increased provision of affordable housing in smaller settlements, Option 2 will also support the availability of the rural workforce in key sectors such as agriculture, forestry and leisure/recreation.</p>	2	1
<b>Summary</b>	<p>Option 2, will, in comparison to Option 1, increase the level of affordable housing provision in the smaller settlements of the National Park where available sites tend to be of a more limited size. This will support the vitality of smaller settlements and rural areas through facilitating the provision of housing for a broader range of groups and ages. The option will also support the quality of life of existing residents through enhanced affordable housing provision and enabling them to remain locally, supporting accessibility to current employment and social networks. Option 2 will also do more to support the rural economy by enhancing the availability of the rural workforce in key sectors such as agriculture, forestry and leisure/recreation.</p> <p>In terms of landscape character, the historic environment, climate change adaptation and mitigation and biodiversity, it is not possible to differentiate between the options.</p>		



### 3. Development of the planning policies for the South Downs Local Plan

The planning policies for the Local Plan have been developed in line with Government policy, particularly the National Planning Policy Framework (2012) and the Vision and Circular on English National Parks and the Broads (2010), building upon the Partnership Management Plan and the State of the Park Report, evidence base studies, the appraisal of reasonable alternatives undertaken through the SA process and to reflect consultation responses on plan-making to date. This includes the Issues and Options consultation undertaken for the Local Plan in 2014, consultation on the *Local Plan: Preferred Options* undertaken in September 2015, and consultation on the *Pre-Submission South Downs Local Plan* undertaken in September 2017.

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>17</sup>. At this stage, the SA Report set out a number of recommendations designed to enhance the sustainability performance of the Local Plan policies, as follows:

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

The policies and site allocations in the Local Plan were then revisited in 2016, 2017 and 2018 to reflect comments received on the Preferred Options consultation and Pre-Submission consultation, the findings of new and updated evidence base studies and the findings and recommendations of the SA process.

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

- Core Policy SD1: Sustainable Development
- Core Policy SD2: Ecosystems Services
- Core Policy SD3: Major Development

<sup>17</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)

- Strategic Policy SD4: Landscape Character
- Strategic Policy SD5: Design
- Strategic Policy SD6: Safeguarding Views
- Strategic Policy SD7: Relative Tranquillity
- Strategic Policy SD8: Dark Night Skies
- Strategic Policy SD9: Biodiversity and Geodiversity
- Strategic Policy SD10: International Sites
- Development Management Policy SD11: Trees, Woodland and Hedgerows
- Strategic Policy SD12: Historic Environment
- Development Management Policy SD13: Listed Buildings
- Development Management Policy SD14: Climate Change Mitigation and Adaptation of Historic Buildings
- Development Management Policy SD15: Conservation Areas
- Development Management Policy SD16: Archaeology
- Strategic Policy SD17: Protection of the Water Environment
- Development Management Policy SD18: The Open Coast
- Strategic Policy SD19: Transport and Accessibility
- Strategic Policy SD20: Walking, Cycling and Equestrian Routes
- Development Management Policy SD21: Public Realm, Highway Design and Public Art
- Development Management Policy SD22: Parking Provision
- Strategic Policy SD23: Sustainable Tourism
- Development Management Policy SD24: Equestrian Uses
- Strategic Policy SD25: Development Strategy
- Strategic Policy SD26: Supply of Homes
- Strategic Policy SD27: Mix of Homes
- Strategic Policy SD28: Affordable Homes
- Strategic Policy SD29: Rural Exception Sites
- Development Management Policy SD30: Replacement Dwellings
- Development Management Policy SD31: Extensions to existing dwellings, and provision of annexes and outbuildings
- Development Management Policy SD32: New Agricultural and Forestry Workers Dwellings
- Strategic Policy SD33: Gypsies and Travellers and Travelling Showpeople
- Strategic Policy SD34: Sustaining the Local Economy
- Strategic Policy SD35: Employment Land

- Strategic Policy SD36: Town and Village Centres
- Development Management Policy SD37: Development in Town and Village Centres
- Development Management Policy SD38: Shops outside Centres
- Development Management Policy SD39: Agriculture and Forestry
- Development Management Policy SD40: Farm Diversification
- Development Management Policy SD41: Conversion of Redundant Agricultural or Forestry Buildings
- Strategic Policy SD42: Infrastructure
- Development Management Policy SD43: New and Existing Community Facilities
- Development Management Policy SD44: Telecommunications and Utilities Infrastructure
- Strategic Policy SD45: Green Infrastructure
- Development Management Policy SD46: Provision and Protection of Open Space, Sport and Recreational Facilities and burial grounds/cemeteries
- Development Management Policy SD47: Local Green Spaces
- Strategic Policy SD48: Climate Change and Sustainable Use of Resources
- Strategic Policy SD49: Flood Risk Management
- Development Management Policy SD50: Sustainable Drainage
- Development Management Policy SD51: Renewable Energy
- Development Management Policy SD52: Shop Fronts
- Development Management Policy SD53: Adverts
- Development Management Policy SD54: Pollution and Air Quality
- Development Management Policy SD55: Contaminated Land
- Strategic Site Policy SD56: Shoreham Cement Works
- Strategic Site Policy SD57: North Street Quarter and adjacent Eastgate area, Lewes
- Allocation Policy SD58: Former Allotments, Alfriston
- Allocation Policy SD59: Kings Ride, Alfriston
- Allocation Policy SD60: Land at Clements Close, Binsted
- Allocation Policy SD61: New Barn Stables, The Street, Binsted
- Allocation Policy SD62: Land at Greenway Lane, Buriton
- Allocation Policy SD63: Land South of the A272 at Hinton Marsh, Cheriton
- Allocation Policy SD64: Land South of London Road, Coldwaltham
- Allocation Policy SD65: Land East of Warnford Road, Corhampton
- Allocation Policy SD66: Land at Park Lane, Droxford
- Allocation Policy SD67: Cowdray Works Yard, Easebourne

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

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

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

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

### 4.1 Purpose of this chapter

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

### 4.2 Appraisal of policies for site allocations

#### 4.2.1 Approach to the appraisal of the strategic sites and site allocations

The Submission version of the Local Plan allocates 38 sites for housing and employment.

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

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

**Table 4.1: Summary of the appraisal of site allocations proposed through the Submission Local Plan**

Site	Landscape	Climate Change Adaptation	Biodiversity	Cultural Heritage	Cultural Activity	Health and Wellbeing	Vitality of Communities	Accessibility	Sustainable Transport	Housing	Climate Change Mitigation	Local Economy	Significant effects?
SD56: Shoreham Cement Works	+	+	+	+	+	+		?	+		-	+	Y
SD57: North Street Quarter and adjacent Eastgate area, Lewes	+	+	?	+	+	+	+	+	+	+	-	+	Y
SD58: Former Allotments, Alfriston	?	?	?	?		?	+	+	?	+	-	+	N
SD59: Kings Ride, Alfriston	?		+				+	+	?	+	-	+	N
SD60: Land at Clements Close, Binsted			?				+	?	?	+	-	+	Y
SD61: New Barn Stables, The Street, Binsted			?					?	-	+	-		N
SD62: Land at Greenway Lane, Buriton	?						+	+	+	+	-	+	N
SD63: Land South of the A272 at Hinton Marsh, Cheriton	?	?	?				+	+	?	+	-	+	N
SD64: Land South of London Road, Coldwaltham	-		?				+	?	?	+	-	+	Y
SD66: Land at Park Lane, Droxford	?	?		?			+	?	?	+	-	+	N

Site	Landscape	Climate Change Adaptation	Biodiversity	Cultural Heritage	Cultural Activity	Health and Wellbeing	Vitality of Communities	Accessibility	Sustainable Transport	Housing	Climate Change Mitigation	Local Economy	Significant effects?
SD67: Cowdray Works Yard, Easebourne	?	?	+	?	+		+	+	+	+	-	+	N
SD68: Land at Egmont Road, Easebourne	?	?		?		+	+	+	+	+	-	+	N
SD69: Former Easebourne School, Easebourne	?	?	+	?			+	+	+	+	-	+	N
SD71: Land at Elm Rise, Findon	?		+				+	+	+	+	-	+	N
SD72: Soldiers Field House, Findon	?	?	+				+	+	+	+	-	+	N
SD73: Land at Petersfield Road, Greatham	?		?	?			+	+	?	+	-	+	N
SD74: Land at Fern Farm, Greatham	?		?					+	?	+	-		N
SD75: Half Acre, Hawkley	?	?	+					-	?	+	-		N
SD76: Land at Itchen Abbas House, Itchen Abbas	?		?			?	+	+	+	+	-	+	N
SD77: Land at Castelmer Fruit Farm, Kingston near Lewes	?	?	?			+	+	+	?	+	-	+	N
SD78: The Pump House, Kingston			?					?	?	+	-		N
SD79: Land at Old Malling Farm, Lewes	-	?	?	-		+	+	?	?	+	-	-	Y
SD80: Malling Brooks, Lewes	<i>Site has gained planning consent so not appraised</i>												
SD81: West Sussex County Council Depot, Midhurst			+	+			+	+	?	+	-		N
SD82: Holmbush Caravan Park, Midhurst	?	?	?				+	+	+	+	-		N
SD83: Land at the Fairway, Midhurst			?	+			+	+	?	+	-		N
SD84: Land at Lamberts Lane, Midhurst	?			?		?	+	+	+	+	-		N
SD85: Land at Park Crescent, Midhurst	?			?			+	+	+	+	-	+	N
SD86: Offham Barns, Offham	?	?						+	+	+	-		N
SD88: Land at Ketchers Field, Selborne	?		?	?			+	+	?	+	-	+	N
SD89: Land at Pullens Lane, Sheet	?		?	?		+	+	?	?	+	-	+	N
SD90: Land at Loppers Ash, South Harting	?			?			+	+	?	+	-	+	N
SD91: Land North of the Forge, South Harting	?	?		?			+	+	?	+	-	+	N
SD92: Stedham Sawmill, Stedham	+		?	?			+	+	?	+	-	+	N

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

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

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

**Strategic Site Policy SD56: Shoreham Cement Works**

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

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

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

**Policy SD60: Land at Clements Close, Binsted**

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

**Policy SD64: Land South of London Road, Coldwaltham**

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

## 4.3 Appraisal of the Submission Local Plan Policies

### 4.3.1 Approach to the appraisal

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

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

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

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

Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of many policies in the *Local Plan*. The ability to predict effects accurately is also affected by the limitations of the baseline data. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure assumptions are

explained in full.<sup>18</sup> In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) of policies in more general terms.

### 4.3.2 Landscape

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

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

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

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

Core Policy SD2 (Ecosystems Services) will directly and indirectly support landscape character in the SDNP. Through increasing the resilience of the National Park's natural environment to change, and seeking to supporting services, provisioning services, regulating services and cultural services, the policy will support a landscape-scale approach to environmental protection and enhancement. This will enable landscape character both to be protected and evolve in a way which will enhance its capacity to support the Special Qualities of the National Park. This will also help the landscape of the National Park adapt to the likely impacts of climate change and extreme weather events over the longer term through promoting a landscape-level ecological approach.

<sup>18</sup> As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pagelid=156210>): "Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."

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

**Table 4.2: Likely significant effects: Landscape**

<i>Likely significant effect</i>	<i>Effect dimensions</i>	<i>Recommendations / mitigation</i>
<p>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.</p>		

### 4.3.3 Climate Change Adaptation

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

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

Policy SD49 (Flood Risk Management) sets out the Local Plan’s approach to flood risk. Broadly in line with national policy, this seeks to limit flood risk through requiring flood risk assessments for all development on sites where identified by the Environment Agency and the outcomes of the SFRA and directing development to areas within Flood Zone 1 wherever possible. It also states that ‘Proposed flood protection, mitigation and adaptation measures should be supported with a management schedule, the identification of the body responsible for maintenance, and evidence of funding and maintenance in perpetuity.’ This is supported by Policy SD50 (Sustainable Drainage), which further supports this through seeking to ensure development proposals give priority to suitable sustainable drainage systems where required by the Lead Local Flood Authority. However, it is considered that this approach is broadly in line with the NPPF and as such is not likely to have significant effects beyond the baseline (i.e. in addition to the NPPF).

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

**Table 4.3: Likely significant effects: Climate change adaptation**

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

#### 4.3.4 Biodiversity

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

Policy SD9 (Biodiversity and Geodiversity) sets out a hierarchy of sites of biodiversity value and a policy approach for each. This is broadly in line with the NPPF and other planning / conservation legislation. However, the policy does widen the scope to consider non-designated sites and habitats, including 'irreplaceable habitats'. It also seeks to enhance ecological connections and priority habitats, supports the provisions of Biodiversity Action Plans (including targets) and the aims of Biodiversity Opportunity Areas, seeks to promote native species, and support the mitigation hierarchy. A key element of the policy is also to realise opportunities in the National Park for achieving biodiversity net gain. This reflects a central focus of the recently introduced 25 Year Environment Plan<sup>19</sup>. Supporting the provisions of SD9, Policy, SD10 (International Sites) provides a robust approach to the protection of internationally designated sites in the National Park. This has been reflected by the findings of the Habitats Regulations Assessment (HRA) undertaken to date for the Local Plan.

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

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

<sup>19</sup> HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment

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

**Table 4.4: Likely significant effects: Biodiversity**

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

### 4.3.5 Cultural Heritage

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

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

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

In relation to the National Park's rich archaeological resource, Policy SD16: Archaeology sets out a number of provisions for development proposals affecting heritage assets with archaeological and historic interest. This includes provisions for ensuring Heritage Statements are undertaken where

appropriate, the preservation of scheduled monuments takes place in situ, and where loss of archaeological features are unavoidable (following the provisions set out by the policy), preservation by record secured through an agreed Written Scheme of Archaeological Investigation will be required. This is supported by the site allocations policies, which, where relevant, have a focus on undertaking appropriate archaeological surveys to accompany new development proposals, and which seek to ensure the archaeological interest of the site is fully considered during new development activities.

A range of other policies also directly or indirectly contribute positively to this theme. This includes SD14 (Climate Change Mitigation and Adaptation of Historic Buildings), which supports the protection of heritage assets when upgrading the energy performance of these buildings, and SD39 (Agriculture and Forestry), which seeks to protect the heritage value of agricultural and forestry buildings during their conversion and facilitate their reuse. Policy SD41 (Conversion of Redundant Agricultural or Forestry Buildings) also seeks to support the heritage value of converted agricultural or forestry buildings through seeking to conserve and enhance the architectural and historic significance and setting of these types of heritage assets. Further key policies include policy SD7 (Safeguarding Views), which has a close focus on protecting the ‘visual integrity, identity scenic quality’ of National Park and protecting ‘specific features relevant to the National Park and its special qualities, such as heritage assets (either in view or the view from)...’, and SD18 (Open Coast), which seeks to conserve and enhance the character of the Heritage Coast and undeveloped coastline. Policy SD20 (Walking, Cycling and Pedestrian Routes) is also relevant as it safeguards disused railway line routes for future use as non-motorised transport corridors, potentially allowing increased access to and enjoyment of such historic assets, and SD19 (Transport and Accessibility) supports development which seeks to initiate measures to ‘restrict the impact of heavy goods vehicles and other traffic on historic streets’.

**Table 4.5: Likely significant effects: Cultural Heritage**

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

### 4.3.6 Cultural Activity

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

The National Park is a major resource for recreation and tourism, which plays a significant role in the local economy. There are number of policies within the Local Plan which will encourage increased engagement in cultural activity by the community and promote sustainable tourism. For example, protection of landscape character (SD4), the historic environment (SD12-15), biodiversity and geodiversity (policy SD9), views (SD6) and tranquillity (SD7) will conserve and enhance key National

Park assets (including special qualities) that draw tourists to the area, while improvements to public transport will indirectly facilitate engagement in cultural activity through increasing accessibility (SD18 and 19).

Other policies seek to provide for the necessary infrastructure to support sustainable tourism as well as discouraging negative impacts such as increased traffic congestion. Policy SD23 (Sustainable Tourism) sets out criteria relating to the development of visitor accommodation and visitor attractions and policy SD24 (Recreation) does similar for recreation facilities. This will be further supported by the proposals for Shoreham Cement Works, which has a close focus on supporting sustainable tourism / visitor based recreation activities and leisure development directly related to the understanding and enjoyment of the National Park. All three refer to the need to balance development and support for tourism and recreation activities with the need to protect the quiet enjoyment of the National Park and manage wider impacts. There will be a need to carefully manage such impacts, particularly the cumulative impacts of development in tourist 'hot-spots', as well as a need to consider if it is possible to define in advance a 'tipping point' when further tourism development in an area is considered unsustainable.

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

**Table 4.6: Likely significant effects: Cultural Activity**

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

### 4.3.7 Health and Wellbeing

The Local Plan does not seek to facilitate large scale housing and employment growth in the National Park, and does not seek to meet OAN. As such, the Local Plan will facilitate the retention of large areas

of undeveloped land within the National Park. This approach will help encourage and promote the use of the National Park as a place for healthy outdoor activity and relaxation and support the various ecosystems services provided by the National Park. Given the benefits provided by the National Park extend to the wider South East of England and beyond, and the role of the National Park as a 'green heart' of the sub-region, the proposed development strategy for the Local Plan will have regional benefits for health and wellbeing.

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

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

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

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

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

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



**Table 4.7: Likely significant effects: Health and Wellbeing**

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

**4.3.8 Vitality of Communities**

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

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

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

**Table 4.8: Likely significant effects: Vitality of Communities**

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

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

### 4.3.9 Accessibility

Good accessibility to services and facilities is important to sustaining vital communities (see above) and to health and wellbeing (see section 4.3.7) as well as for reducing air pollution, carbon emissions and traffic congestion related to heavy dependence on car travel. However accessibility to services and facilities is limited in many parts of the National Park due to the dispersed nature of settlements and limited public transport provision.

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

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

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

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

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

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

**Table 4.9: Likely significant effects: Accessibility**

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

**4.3.10 Sustainable Transport**

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

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

Policy SD19 (Transport and Accessibility) is anticipated to have a direct positive impact on the proportion of travel by sustainable modes by ensuring that new development is in locations such as

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

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

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

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

**Table 4.10: Likely significant effects: Sustainable Transport**

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

### 4.3.11 Housing

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

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

Key housing challenges in the SDNP include housing affordability and the provision of traveller sites. The distribution of housing across the National Park will need to be in accordance with the Development Strategy (Strategic Policy SD25). Policy SD26 (Supply of Homes) sets out housing provision figures for housing and overall housing including the expected levels of housing growth by

settlement. Policy 27 (Mix of Homes) seeks to 'achieve a 'balanced mix of housing to meet projected future household needs for the local area'. The policy seeks to achieve this through setting out the proportion of 1, 2, 3, 4 and 4+ bedroom dwellings which should be delivered in i) affordable housing provision and ii) market housing.

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

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

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

**Table 4.11: Likely significant effects: Housing**

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

### 4.3.12 Climate Change Mitigation

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

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

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

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

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

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

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

**Table 4.12: Likely significant effects: Climate Change Mitigation**

<i>Likely significant effect</i>	<i>Effect dimensions</i>	<i>Recommendations / mitigation</i>
Carbon sequestration and provision of woodfuel through extension of wood planting.	Direct, long-term, permanent and positive.	Level of significance uncertain at this stage. Woodland creation and the links to biomass/biofuel use should be given greater policy prominence, perhaps as part of policy SD11, Trees, Woodland and Hedgerows.

### 4.3.13 Economy

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

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

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

The policy approaches proposed through the Submission version of the Local Plan address transport and accessibility in the SDNP and generally promotes development that reduces the need to travel (section 4.3.10). Given the reliance on private vehicles for transport around much of the National Park, and the lack of public transport services the general intent of the policy has the potential to cause tension. The policy does recognise that larger scale development is more likely to be located close to larger centres. Specific requirements in the form of a design and access statement and/or a transport assessment are required for development outside the main centres of Lewes and Petersfield. While this does impose a further development cost on some rural development, the additional cost is considered negligible and appropriate, given the overall Purposes and Duty of the National Park and the potential for the special qualities to be adversely affected by additional traffic. The policy also promotes the restoration of the former Lewes-Uckfield railway line and the Wey and Arun canal. Restoration of these routes would be expected to make a positive contribution to the values of the South Downs National Park and enhance its role and function as a visitor destination which would be to the benefit of the rural economy in the area. This will be further supported by the proposals for

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

Shoreham Cement Works, which has a close focus on supporting sustainable tourism / visitor based recreation activities and leisure development directly related to the understanding and enjoyment of the National Park. Policy SD23 (Sustainable Tourism) also aims to ensure that the National Park contains appropriate infrastructure to support tourism (while ensuring that supporting infrastructure does not adversely affect the National Park's special qualities). This would be expected to have a positive effect on the economy.

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

**Table 4.13: Likely significant effects: Economy**

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

## 4.4 Cumulative effects

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

In the context of SA/SEA, cumulative effects can arise as a result of the in-combination and synergistic effects of a plan's policies and proposals. Comprising 'intra-plan' effects, these interactions have been discussed above in Sections 4.3.2 to 4.3.13, which evaluate the in-combination and synergistic<sup>21</sup> effects of the various policies of the Local Plan.

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

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

- Winchester;
- Eastleigh;
- Fareham;
- Havant;
- Portsmouth;
- East Hampshire;
- Chichester;
- Arun;

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



- Horsham;
- Worthing/Adur;
- Mid Sussex;
- Brighton and Hove;
- Lewes;
- Wealden;
- Eastbourne; and
- Waverley.

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

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

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

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

- Increases in traffic flows and congestion from the in-combination effects of development and an increase in visitor numbers, with potential impacts on air and noise quality and landscape character. However the in-combination effects of proposals on enhancing public transport and pedestrian and cycle infrastructure may help limit potential negative effects and secure positive effects in this regard.
- Incremental erosion of the setting of the National Park as a result of the need to deliver objectively assessed need sub-regionally, and associated cumulative impacts on landscape character from new development. This includes views from the National Park. However the Local Plan provides a strong context for protecting and enhancing landscape character of the National Park.
- Cumulative impacts on ecological networks. This is from the in-combination effects of new development and associated infrastructure on habitats and biodiversity corridors. However, enhancements to green infrastructure provision facilitated through Local Plan proposals and other projects in the area have significant potential to support local, sub-regional and regional ecological networks.

- Impacts on regional housing demand from the in-combination effects of the South Downs Local Plan and other Local Plans in the sub-region not meeting local housing need.
- Impacts on flood risk from the in-combination effects of new development, including relating to surface water and fluvial flooding. However, the provisions of the NPPF and measures and policy approaches implemented through the relevant plans and proposals will limit the significance of effects.
- Changes in land uses resulting from the UK leaving the European Union, including associated with the replacement of schemes such the Common Agricultural Policy with new agricultural subsidy regimes.
- Improvements to accessibility resulting from the in-combination effects of enhancements to public transport and walking and cycling networks.

As highlighted above, for many potential cumulative effects, the policy approaches proposed by the 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.

## 5. Monitoring programme for the SA

### 5.1 Monitoring in SA

The SEA Directive states that '*member states shall monitor the significant environmental effects of the implementation of plans and programmes.....in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action*' (Article 10.1). In addition, the Environmental Report (or SA Report) should provide information on a '*description of the measures envisaged concerning monitoring*' (Annex I (i)). To limit the potential burdens related to monitoring associated with the SA process, monitoring should be undertaken smartly. For this reason, the proposed monitoring framework should focus on those aspects of the environment that are likely to be negatively impacted upon, where the impact is uncertain or where particular opportunities for improvement might arise.

### 5.2 Proposed monitoring programme

Table 5.1 outlines suggestions for a monitoring programme for measuring the Local Plan's implementation in relation to the areas where the SA has identified significant opportunities for an improvement in sustainability performance to arise. It also seeks to monitor where uncertainties relating to the appraisal findings arose and suggests where monitoring is required to help ensure that the benefits of the Local Plan are achieved through the planning process.

The purpose of monitoring is to measure the significant sustainability effects of a plan, as well as to measure success against the plan's objectives. It is therefore beneficial if the monitoring strategy builds on monitoring systems which are already in place. To this end, the indicators of progress chosen for the SA require data that is already being routinely collected at a National Park level by the SDNPA and its partner organisations, or whose collection is already planned. It should also be noted that monitoring can provide useful information for future plans and programmes, including a forthcoming review of the Local Plan.

**Table 5.1: Proposed monitoring programme for the SA of the Local Plan**

<i>Area to be monitored</i>	<i>Indicator</i>	<i>Data source</i>	<i>Frequency of monitoring</i>
Car use	<ul style="list-style-type: none"> <li>Proportion of visits to the National Park by transport mode</li> <li>Gross increase in non-motorised multi-user routes (km)</li> </ul>	South Downs National Park Authority	Annual
Effect of housing, employment and infrastructure on greenhouse gas emissions.	<ul style="list-style-type: none"> <li>Gross increase in non-motorised multi-user routes (km)</li> </ul>	South Downs National Park Authority	Annual
Local and strategic green infrastructure provision	<ul style="list-style-type: none"> <li>Developments granted planning permission for new Green Infrastructure assets</li> <li>Developments granted planning permission within Local Green Space</li> <li>Quality of Green Infrastructure in new developments</li> </ul>	South Downs National Park Authority	Annual
Population and distribution of key biodiversity species	<ul style="list-style-type: none"> <li>Area, condition and connectivity of target priority habitats</li> <li>Population and distribution of priority species</li> <li>Developments granted planning permission within designated wildlife sites or ancient woodland or overlapping veteran trees</li> </ul>	South Downs National Park Authority	Annual
Impact on landscape character	<ul style="list-style-type: none"> <li>Applications permitted, or refused on design grounds, contrary to the advice of the Design Review Panel and SDNPA Design Officers</li> <li>Quality of design in new developments</li> <li>Percentage of the National Park that is relatively tranquil for its area</li> <li>Planning applications granted for loss of TPO trees without replacement</li> <li>Developments granted planning permission within the Sussex Heritage Coast and 'Undeveloped Coastal Zone'</li> </ul>	South Downs National Park Authority	When LCA undertaken
Flood risk	<ul style="list-style-type: none"> <li>Developments granted planning permission contrary to the advice of the Environment Agency in Flood Risk Zones 2 and 3</li> </ul>	South Downs National Park Authority	Annual
Affordable housing delivery	<ul style="list-style-type: none"> <li>Number of affordable dwellings completed (net), broken down by tenure and type of site</li> </ul>	South Downs National Park Authority	Annual
Employment in traditional sectors of South Downs National Park economy	<ul style="list-style-type: none"> <li>Agricultural and forestry workers' dwellings granted planning permission and lost</li> <li>Developments granted planning permission for agricultural developments in the reporting year</li> <li>Employment and housing completions resulting from conversion of agricultural or forestry buildings</li> </ul>	South Downs National Park Authority	Annual

<i>Area to be monitored</i>	<i>Indicator</i>	<i>Data source</i>	<i>Frequency of monitoring</i>
Contribution of the visitor economy to employment	<ul style="list-style-type: none"> <li>• Visitor enjoyment levels</li> <li>• CIL funds spent, by type of project (leisure and recreational projects connected with the National Park's Special Qualities)</li> <li>• Developments granted planning permission for visitor accommodation facilities</li> <li>• Developments granted planning permission for community, culture, leisure and recreation facilities</li> <li>• Average length of visitor stay and spend per visitor per day</li> </ul>	South Downs National Park Authority	Annual
Employment in emerging sectors of South Downs National Park economy	<ul style="list-style-type: none"> <li>• Change in land use by category</li> <li>• Number of planning permissions for renewable energy development</li> </ul>	South Downs National Park Authority	Annual

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**Part 3:**  
**What are the next steps?**

## 6. Next Steps

### 6.1 Next steps for plan making / SA process

This SA Report accompanies the submission version of the Local Plan (*South Downs Local Plan Submission*). The Local Plan will be submitted to the Secretary of State in April 2018 and alongside this SA Report, will undergo an Independent Examination in Public later in 2018.

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

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

